



Good practice guidance on Strategic Environmental Assessment (SEA) for the Tourism Sector



Good practice guidance on Strategic Environmental Assessment (SEA) for the Tourism Sector

This guidance note has been prepared by CAAS Consultants on behalf of the EPA.

Published June 2023

ISBN 978-1-80009-097-2

Acknowledgements

This guidance note has been prepared by CAAS Consultants, on behalf of the EPA.

Special thanks to Cian O'Mahony, Suzanne Wylde and Tadhg O'Mahony from the EPA's SEA Team, for their valuable contributions in helping to finalise this guidance document.

The Front cover image is provided courtesy of Dr Jonathan Derham.

© Environmental Protection Agency 2023

Although every effort has been made to ensure the accuracy of the material contained in this publication, complete accuracy cannot be guaranteed.

Neither the Environmental Protection Agency nor the author(s) accepts any responsibility whatsoever for loss or damage occasioned, or claimed to have been occasioned, in part or in full as a consequence of any person acting or refraining from acting, as a result of a matter contained in this publication. All or part of this publication may be reproduced without further permission, provided the source is acknowledged.

Contents

Abbreviations	5
1. Introduction	6
2. General Principles	13
3. Scoping	15
4. Outline of the Contents and Main Objectives of the Plan	22
5. Public Consultation/Stakeholder Participation	26
6. Relationship with Other Relevant Plans and Programmes	29
7. Relevant Aspects of the Current State of the Environment and the Likely Evolution Thereof, Without Implementation of the Plan	32
8. Environmental Characteristics of Areas Likely to be Significantly Affected	41
9. Existing Environmental Problems	43
10. SEA Framework	47
11. Alternatives	51
12. Likely Significant Environmental Effects	63
13. Mitigation Measures	79
14. Monitoring Measures	89
15. Finishing the Environmental Report	94
16. Post-Adoption SEA Statement (Information on the Decision) and Monitoring	97
Glossary	103
References	105

List of Boxes

Box 4.1 <i>Example:</i> Summary of plan content	23
Box 4.2 <i>Example:</i> Scope of application and implementation	24
Box 7.1 <i>Example:</i> Description of likely evolution of the environment without the plan (National Monuments Service)	37
Box 7.2 <i>Example:</i> Description of likely evolution of the environment without the plan (Failte Ireland - West Cork DEDP)	39
Box 9.1 <i>Example:</i> Environmental problems relating to a tourism plan area	46
Box 11.1 <i>Example:</i> Visitor number and other alternatives	54
Box 11.2 <i>Example:</i> Alternatives relating to 'need or demand' and 'mode or process' for a plan	55
Box 11.3 <i>Example:</i> Alternatives relating to 'mode or process' for a plan with spatial elements	57
Box 11.4 <i>Example:</i> Part of the assessment of alternatives	61
Box 12.1 <i>Example:</i> Cumulative effects	77
Box 12.2 <i>Example:</i> Documenting the consideration of transboundary effects	78
Box 14.1 <i>Example:</i> SEA monitoring programme for Fáilte Ireland's Wild Atlantic Way operational programme	90
Box 15.1 <i>Example:</i> Difficulties encountered (Waterways Ireland)	95
Box 15.2 <i>Example:</i> Difficulties encountered (Failte Ireland)	95
Box 16.1 <i>Example:</i> Summary of consultations throughout the plan preparation/SEA process	99

List of Figures

Figure 1.1 Overall SEA process stages	8
Figure 1.2 Flowchart of the SEA process	11
Figure 1.3 Example: SEA process and outputs flowchart	12
Figure 3.1 SEA Directive considerations relating to the level of detail of the SEA	16
Figure 4.2 <i>Example:</i> Plan development process	25
Figure 5.1 <i>Example:</i> Documenting public consultation responses	28
Figure 6.1 <i>Example:</i> How selected tourism plans relate to other plans, programmes and projects	31
Figure 7.1 <i>Example:</i> Description of current state of cultural heritage	36
Figure 7.2 <i>Example:</i> Environmental sensitivity mapping	37
Figure 8.1 <i>Example:</i> Environmental characteristics of particular areas	42
Figure 10.1 <i>Examples:</i> Sets of significance criteria	49
Figure 11.1 <i>Example:</i> Decision tree showing process of choosing selected alternative	62
Figure 12.1 <i>Example:</i> Regional assessment	68
Figure 12.2 <i>Example:</i> Site-specific assessment	69
Figure 12.3 <i>Example:</i> The Iterative process	72
Figure 13.1 'Hierarchy of mitigation measures' for tourism plans	80
Figure 13.2 <i>Example:</i> Strategic visitor management	84
Figure 13.3 <i>Suggestion:</i> Strategic Visitor management in busy coastal zones	85
Figure 13.4 <i>Examples:</i> Techniques for infrastructure	86

List of Tables

Table 1.1	SEA Directive requirements and where they are discussed in this guidance note	10
Table 2.1	Does your SEA fulfil these criteria?	13
Table 3.1	<i>Example:</i> Documenting SEA scoping consultation responses	18
Table 3.2	Documenting SEA scoping in and out of issues	19
Table 3.3	Considering tourism attribution in the context of SEA scoping for a tourism plan	21
Table 4.1	<i>Example:</i> Identification of plan objectives	23
Table 9.1	<i>Suggestion:</i> How existing environmental problems might be documented	44
Table 9.2	<i>Example:</i> Environmental problems relating to particular European sites	45
Table 10.1	<i>Example:</i> Strategic environmental objectives, indicators and targets	48
Table 11.1	'Hierarchy of mitigation alternatives' for tourism plans	52
Table 11.2	<i>Example:</i> Part of the assessment of alternatives (Clare County Council)	58
Table 11.3	<i>Example:</i> Part of the assessment of alternatives (Failte Ireland)	59
Table 12.1	<i>Example:</i> Plan policy assessment using SEA framework	73
Table 12.2	<i>Example:</i> Cumulative effects – biodiversity and flora and fauna	75
Table 12.3	<i>Example:</i> Cumulative Effects – Water	76
Table 13.1	<i>Example:</i> Selection of strategic mitigation measures	81
Table 13.2	<i>Example:</i> Linking effects to mitigation	88
Table 14.1	<i>Example:</i> Part of SEA monitoring programme	93
Table 16.1	Information required by Article 9 of the SEA Directive	97
Table 16.2	<i>Example:</i> Documenting how written submissions were taken into account	101
Table 16.3	<i>Example:</i> Integration of environmental considerations – updated and new actions	101

Abbreviations

AA	Appropriate Assessment
DECC	Department of the Environment, Climate and Communications
DHLGH	Department of Housing, Local Government and Heritage
EC	European Commission
EIA	Environmental Impact Assessment
EPA	Environmental Protection Agency
EU	European Union
GIS	Geographical Information Systems
IAIA	International Association for Impact Assessment
LAP	Local Area Plan
NPF	National Planning Framework
NPWS	National Parks and Wildlife Service
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SEO	Strategic Environmental Objective
SEPA	Scottish Environment Protection Agency
SI No.	Statutory Instrument Number
SPA	Special Protection Area
UK	United Kingdom

1. Introduction

1.1 Purpose of this document

This note aims to provide good practice guidance and suggestions on how to carry out Strategic Environmental Assessments (SEAs) of tourism plans in Ireland. It responds to a recommendation by the Second Review of the Effectiveness of SEA in Ireland (EPA, 2020a). The focus of the guidance is SEA and tourism, rather than trying to simplify the entire tourism planning process.

This note is not stand-alone guidance: rather it supplements other EPA guidance on SEA, including guidance on SEA screening, SEA and alternatives, SEA and climate, SEA statements and monitoring and SEA and cumulative effects. Other resources include the SEA pack and SEA process checklist.

Permission for the use of all case study material in this document has been provided by each relevant competent authority.

1.2 History of tourism and its promotion in Ireland

'Tourism' is loosely used to describe a spectrum of activities ranging from the use of local amenities and recreational facilities through to places and experiences that are enjoyed by the whole population, local and national as well as international. Amenities such as beaches and coastal walks are just as likely to be used by year-round local residents as by international tourists. Similarly, recreational facilities, such as golf courses or facilities for water sports, adventure, equestrian activities or yachting, are equally likely to be used by locals and Irish weekenders as by international visitors. A very small number of very specific locations and projects are used exclusively, or almost exclusively, by international visitors.

Tourism and its promotion are long-established activities in Ireland. Many existing tourism destinations, attractions, routes, etc. are subject to both recent and long-established promotion activities. Thus the destinations, attractions and routes, their promotion and the intensity of their use are not new.

There is a long-established pattern of tourism promotion in Ireland. The first promotion of Irish tourism is generally credited to Thomas Browne, 4th Viscount Kenmare, who began to promote Killarney and its environs in the 1750s. Touring guides to Ireland date from the late 18th century (Young, 1897) and large-scale touring in Ireland dates back to the latter part of the 19th century. At that time railways and associated large hotels offered access to areas that had hitherto been remote and inaccessible. The 1914 edition of the *Michelin Guide to the British Isles* identified routes and viewing points across Ireland, which have featured in various travel guides since then.

By the beginning of the 20th century, tourism was being actively branded and promoted on a national scale, initially by the Irish Tourism Association and since 1955 by Bord Fáilte,¹ which has continually and consistently promoted Ireland as a tourist destination – both as a country and as specific local/ iconic destinations.

1.3 Tourism management and planning in Ireland

By international standards, Ireland has a high level of tourism management, planning and research. There is overwhelming evidence from Fáilte Ireland's environmental surveying and monitoring of the Wild Atlantic Way Operational Programme that international tourists in rural locations give rise to very low levels of environmental impacts. Most Irish tourism is now urban and structured. Fáilte Ireland's Wild Atlantic Way Monitoring Programme has confirmed that the majority of high-visibility/high-impact visitor effects arise from local recreational use, as levels of visitor impacts have shown no evidence of reduction throughout the Covid period. Most of the impacts from tourism are indistinguishable from the recreational, occupational and betterment effects² generated by local and national populations.

Stand-alone, tourism-specific plans (or policies, programmes, strategies, etc.) are not required to be prepared by legislation. Tourism is, however, already provided for by various statutory documents setting out public policy for, among other things, land use development and activities, infrastructure, sustainable development, environmental protection and environmental management. These plans provide the accommodation, movement and hospitality facilities that are the fundamentals on which the tourism sector is based. All of these documents will have been subject to their own environmental assessment processes, as relevant, and form part of the decision-making and consent-granting framework.

To date, tourism plans in Ireland have generally elaborated on what is already provided for by the existing decision-making and consent-granting framework. They facilitate, promote, support and coordinate stakeholders (including local authorities, other government agencies, tourism operators, communities and visitors) in their activities in a way that is consistent with plans that have been subject to SEA and other assessments. They do not provide consent, establish a framework for granting consent or tend to contribute towards a framework for granting consent. They often provide mechanisms under which funding can be provided for projects (developments or activities), which must comply, as relevant, with various legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licensing requirements as appropriate) that form the statutory decision-making and consent-granting framework.

1 Replaced by Fáilte Ireland in 2003.

2 'Occupational and betterment effects' refers to:

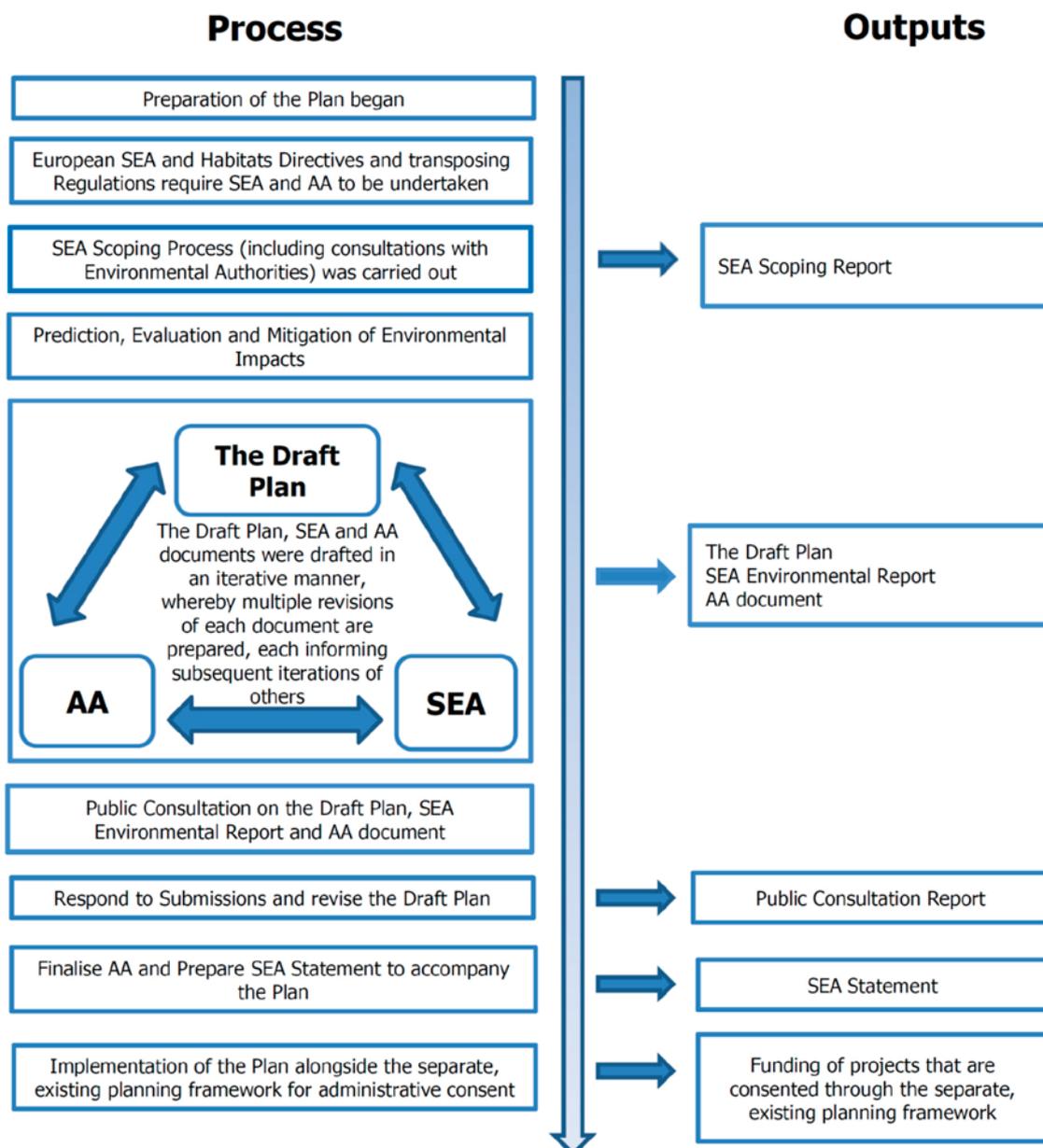
- ongoing improvements in terms of a lack of exploitative behaviours as well as improvements in standards of employment and pay as a result of national wage agreements, employee rights, and health and safety at work;
- ongoing public and private investment to improve ('better') infrastructure (transport, energy, water, sanitation and amenities).

The competent authority for a tourism plan (the body preparing and implementing the plan) may be, for example, a government department, Fáilte Ireland (the National Tourism Development Authority, whose role is to support long-term sustainable growth in the economic, social, cultural and environmental contribution of tourism to Ireland), Tourism Ireland (responsible for marketing the island of Ireland overseas as a leading holiday destination) or planning authorities.

1.4 Strategic environmental assessment (SEA)

SEA aims to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development: as such, this report focuses on ensuring that SEA is a proactive tool for improving a plan, rather than providing a passive ‘snapshot’ of a plan’s impacts.

Figure 1.1 Example: SEA process and outputs flowchart (Fáilte Ireland, 2020b)



Annex I (h) of the SEA Directive requires the environmental report to describe 'how the assessment was undertaken'. Figure 1.1 shows how the SEA process and its outputs can be described.

This chapter of the SEA report can also document the links between the SEA process and the appropriate assessment/Habitats Directive Assessment process, as is also shown on Figure 1.1. Other assessments that may be required for certain plans and programmes include Strategic Flood Risk Assessment and Water Framework Directive related assessment.

The SEA is procedural in nature. Figure 1.2 sets out the overall stages involved in the process, while Figure 1.3 provides a flowchart of the SEA process.

Tourism is one of the specified sectors falling under the remit of the SEA Directive. The national SEA regulations applicable to tourism-related plans are provided by European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI No. 435 of 2004), amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (SI No. 200 of 2011). Screening for SEA may be required in certain instances in order to determine whether SEA is required. The EPA's (2021a) 'Good Practice Guidance on SEA Screening' and the Department of Housing, Local Government and Heritage's (2022) 'Strategic Environmental Assessment: Guidelines for Regional Assemblies and Planning Authorities' may be useful for those undertaking screening for SEA.

The EPA's SEA screening guidance states that 'SEA is directly linked to Appropriate Assessment under the EU Habitats Directive through Article 3.2b. In circumstances where screening for SEA is pointing toward screening out (i.e. SEA is determined not to be required), this determination cannot be concluded until such time as screening for Appropriate Assessment (AA) has been concluded.' Furthermore, certain plans and programmes that require Stage 2 Appropriate Assessment under the Habitats Directive automatically require SEA under the SEA Directive (SEA Directive article 3.2b).

When modifications to plans and programmes involve the use of small areas at local level or are considered to be minor modifications to the plan or programme, they shall require an environmental assessment only where it is determined that they are likely to have significant effects on the environment (SEA Directive article 3.3).

For plans and programmes that require SEA, Table 1.1 presents the requirements of the SEA Directive and shows where they are discussed in this guidance.

Table 1.1 SEA Directive requirements and where they are discussed in this guidance note

SEA Directive requirement	Section(s) of this guidance note
<p>Preparing an environmental report in which the likely significant effects on the environment of implementing the plan, and reasonable alternatives taking into account the objectives and geographical scope of the plan, are identified, described and evaluated. The following information needs to be provided (as set out in Article 5 and Annex I):</p>	
<p>a) An outline of the contents, main objectives of the plan, and relationship with other relevant plans and programmes;</p>	4 and 6
<p>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan;</p>	7
<p>c) The environmental characteristics of areas likely to be significantly affected;</p>	8
<p>d) Any existing environmental problems that are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;</p>	9
<p>e) The environmental protection objectives, established at international, community or national level, that are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;</p>	10
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (These effects should include secondary, cumulative, synergistic, short-, medium- and long-term permanent and temporary, positive and negative effects);</p>	12
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;</p>	13
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	11
<p>i) a description of measures envisaged concerning monitoring in accordance with Article 10;</p>	14 and 16
<p>j) a non-technical summary of the information provided under the above headings.</p>	15
<p>The report must include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Article 5.2).</p>	

SEA Directive requirement	Section(s) of this guidance note
<p>Consulting:</p> <ul style="list-style-type: none"> ■ authorities with environmental responsibilities, when deciding on the scope and level of detail of the information that must be included in the environmental report (Article 5.4); ■ authorities with environmental responsibilities and the public, to give them an early and effective opportunity within appropriate time frames to express their opinion on the draft plan and the accompanying environmental report before the adoption of the plan (Article 6.1, 6.2); ■ other EU Member States, where the implementation of the plan is likely to have significant effects on the environment in these countries (Article 7). 	5 and 16
Taking the environmental report and the results of the consultations into account in decision-making (Article 8).	
<p>Providing information on the decision (often referred to as the 'SEA Statement'). Article 9 (Information on the decision) requires that:</p> <ul style="list-style-type: none"> ■ When the plan is adopted, the public and any countries consulted under Article 7 must be informed and the following made available to those so informed: <ul style="list-style-type: none"> ● the plan as adopted; ● a statement summarising how environmental considerations have been integrated into the plan and how the environmental report of Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with; and ● the measures decided concerning monitoring (in accordance with Article 10). 	16
Monitoring the significant environmental effects of the plan's implementation (Article 10)	14 and 16

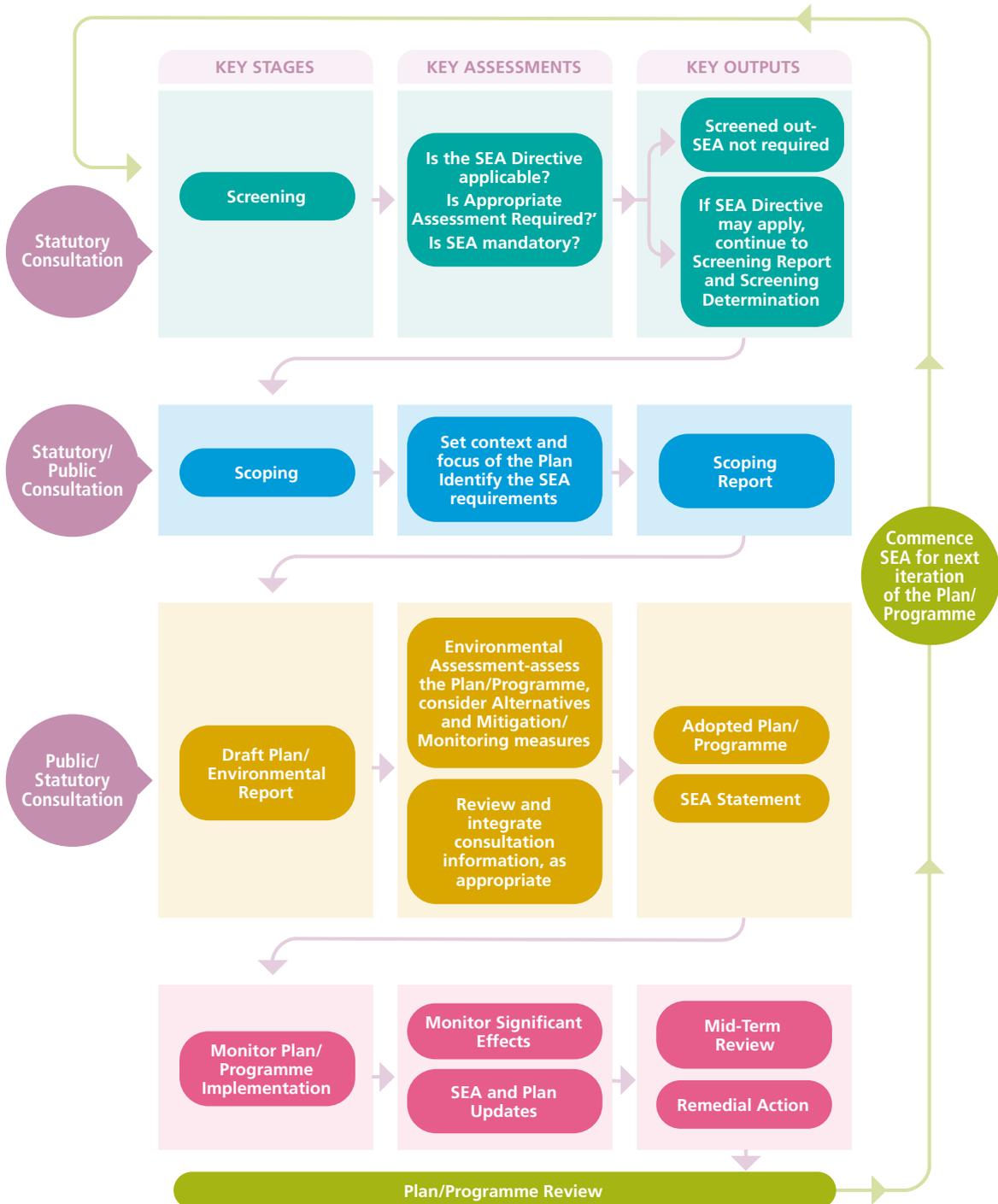
Figure 1.2 Overall SEA process stages



Figure 1.3 Flowchart of the SEA process

STRATEGIC ENVIRONMENTAL ASSESSMENT Process Overview

Strategic Environmental Assessment (SEA) is a systematic process for identifying, reporting, proposing mitigation measures and monitoring environmental effects of plans, programmes and strategies. It aims to ensure that environmental issues are taken into account at every stage in the preparation, implementation, monitoring and review of plans, programmes and strategies of a public nature.



2. General Principles

Key points:

- SEA is a proactive problem-solving process. It provides for structured review of the plan with the aim of making it more environmentally sustainable.
- SEA should foster the participation of statutory environmental authorities and the public in the plan-making process.
- The SEA process should start early in plan-making and be integrated throughout the plan-making process.

The overall aim set out in Article 1 of the SEA Directive (2001/42/EC) is to provide for a high level of environmental protection and to contribute to the integration of environmental considerations into the preparation of plans and programmes, with a view to promoting sustainable development. In short, the SEA should seek to minimise a plan or programme’s potential environmental impacts.

Reviews of SEA effectiveness in Ireland (EPA, 2012, 2020a) have recommended that the SEA process commence early in the plan-making process and be integrated throughout the plan-making process.

The International Association for Impact Assessment (IAIA) has established a set of SEA performance criteria, and several studies on SEA effectiveness and efficiency recommend ways in which these criteria can be achieved: see Table 2.1.

Table 2.1 Does your SEA fulfil these criteria?

IAIA SEA performance criteria (based on IAIA, 2002)	Practical tips for achieving the criteria (developed from EC, 2009; SEPA, 2011)
<p>SEA is integrated</p> <ul style="list-style-type: none"> ■ Ensures assessment of all strategic decisions relevant to the achievement of sustainable development ■ Addresses the interrelationships of biophysical, social and economic aspects ■ Is tiered to policies in relevant sectors and (transboundary) regions and, where appropriate, to project EIA and decision-making 	<ul style="list-style-type: none"> ■ Start the SEA early in the plan-making process ■ Integrate the SEA process with the plan-making process ■ Integrate the early, evidence-gathering stages of the plan-making and SEA processes
<p>SEA is sustainability-led</p> <ul style="list-style-type: none"> ■ Facilitates identification of development options and alternative proposals that are more sustainable 	<ul style="list-style-type: none"> ■ Focus on improving the plan, rather than providing a ‘snapshot’ of the plan’s impacts

IAIA SEA performance criteria (based on IAIA, 2002)	Practical tips for achieving the criteria (developed from EC, 2009; SEPA, 2011)
<p>SEA is focused</p> <ul style="list-style-type: none"> ■ Provides sufficient, reliable and usable information for development planning and decision-making ■ Concentrates on key issues of sustainable development ■ Is customised to the characteristics of the decision-making process ■ Is cost- and time-effective 	<p>Be spatially specific where possible:</p> <ul style="list-style-type: none"> ■ The level of detail of the SEA should reflect the level of detail of the plan. Where the plan is spatially specific, the SEA should be too ■ Map key constraints such as designations and areas prone to flooding to help inform the plan, e.g. using GIS ■ The scope of the SEA should reflect the alternatives being considered ■ ‘Scope out’ impacts that are not likely to be significant, as long as good reasons are provided for this
<p>SEA is accountable</p> <ul style="list-style-type: none"> ■ Is the responsibility of the leading agencies for the strategic decision to be taken ■ Is carried out with professionalism, rigour, fairness, impartiality and balance ■ Is subject to independent checks and verifications ■ Documents and justifies how sustainability issues were taken into account in decision-making 	<ul style="list-style-type: none"> ■ The SEA should provide plan-makers with explicit recommendations to which they can respond ■ If the SEA is carried out in-house, it can be useful for a colleague to critically review the environmental report and/or the overall SEA process ■ Document changes made to the plan as a result of the SEA process ■ Document how consultation comments on the SEA and the plan were taken into account in plan-making
<p>SEA is participative</p> <ul style="list-style-type: none"> ■ Informs and involves interested and affected public and government bodies throughout the decision-making process ■ Explicitly addresses their inputs and concerns in documentation and decision-making ■ Has clear, easily understood information requirements and ensures sufficient access to all relevant information 	<ul style="list-style-type: none"> ■ Actively engage the public on the plan and SEA, e.g. through the use of stakeholder events/workshops focused on options
<p>SEA is iterative</p> <ul style="list-style-type: none"> ■ Ensures availability of the assessment results early enough to influence the decision-making process and inspire future planning ■ Provides sufficient information on the actual impacts of implementing a strategic decision to judge whether this decision should be amended and to provide a basis for future decisions 	<ul style="list-style-type: none"> ■ Focus on improving the plan, rather than providing a ‘snapshot’ of the plan’s impacts ■ Identify and evaluate impacts with reference to the baseline situation (‘how will things be different without the plan?’) rather than with reference to SEA objectives (‘does the plan help to achieve environmental objectives?’) ■ Consider the extent to which environmental provisions will be effectively delivered on the ground

3. Scoping

Key points:

- Scoping aims to get agreement on the scope and level of detail of the Environmental Report.
- Scoping aims to focus the SEA on key significant issues relevant to the plan. This makes the SEA process more efficient and the Environmental Report more readable

3.1 What is scoping?

Once it has been established that SEA is required, scoping should take place. The purpose of scoping is to ensure that the key environmental issues are identified, and the level of detail to which they should be assessed is agreed by the plan-making team, so that they can be given the necessary emphasis in the environmental assessment.

Scoping is a mandatory requirement and requires consultation with the relevant statutory environmental authorities.

Scoping focuses the SEA on key significant issues relevant to the plan, making the SEA process more efficient and communication more effective.

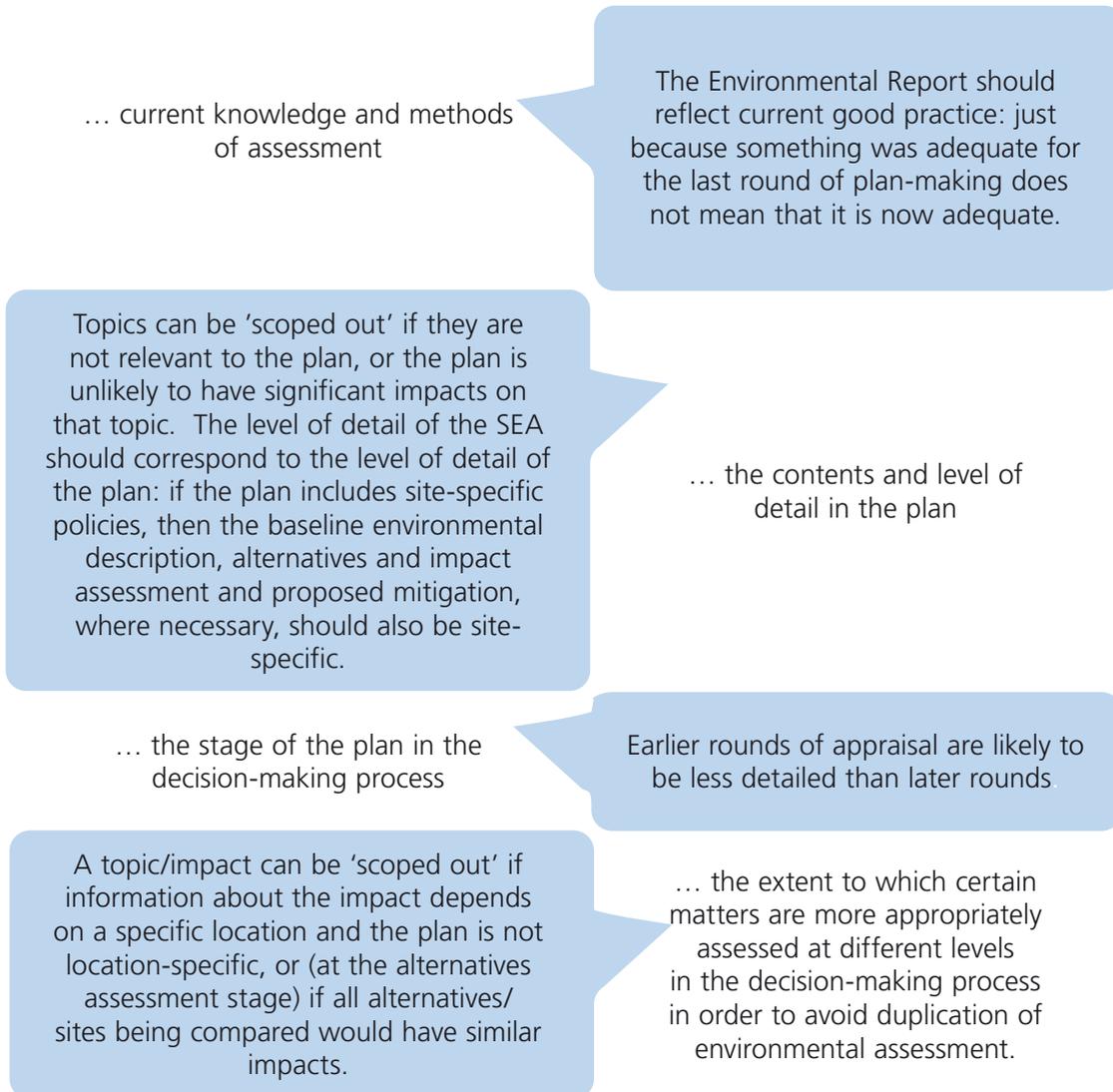
The scope of the environmental report refers to:

- Its geographical scope: the area over which the plan is likely to have significant environmental effects, i.e. the zone of influence of the plan. This may well go beyond the administrative boundaries of the competent authority, and indeed for some plans may go beyond the border of Ireland and lead to transboundary impacts.
- The temporal scope: the time period that the SEA covers. This is typically the time period of the plan.
- The level of detail of the assessment. This will be influenced by the level of detail of the plan: the more detailed the plan, the more detailed the assessment can be.
- The environmental topics to be covered by the SEA (see Section 3.3 below).

The SEA Directive requires that the level of detail of the SEA should take into account the considerations outlined on Figure 3.1.

Figure 3.1 SEA Directive considerations relating to the level of detail of the SEA (EPA, 2019b)

SEA guidance on blue background. SEA Directive text on white background



More general scoping guidance can be found in the 'Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities' (Department of Housing, Local Government and Heritage, 2022), which have informed this section of the guidance document.

3.2 Scoping process and report

The usual approach to SEA scoping is for the plan-making authority to: carry out preliminary environmental baseline data collection and interpretation; prepare an 'SEA Scoping Report'; and send this to the relevant environmental authorities for consultation.

Scoping can begin the process of collating currently available, relevant environmental data that will ultimately inform the environmental report. It generally does not require major new research (refer also to Section 7.2 below, 'Identifying and presenting the data'). The plan preparation and SEA scoping process may be informed by sources of both tourism, such as spatially specific visitor data from Fáilte Ireland, and environmental information, such as that on water services demand and capacity from Irish Water or the EPA's Environmental Sensitivity Mapping (ESM) Webtool³ that allows users to create area-specific environmental sensitivity maps. The identification of relevant environmental and development issues should also be informed by the results of monitoring the significant environmental effects of previous plans (refer also to Section 14 below, 'Monitoring Measures').

The Department of Housing, Local Government and Heritage's website⁴ provides the most up-to-date contact details for the environmental authorities that must be consulted during various stages of the SEA (including scoping), taking account of transfers of functions between Ministers since the SEA Regulations first identified the environmental authorities. The statutory environmental authorities for the purposes of plans falling under SI 435 of 2004 as amended currently are:

- Environmental Protection Agency;
- Department of Environment, Climate and Communications;
- Department of Housing, Local Government and Heritage;
- Department of Agriculture, Food and the Marine.

The public, adjacent authorities and other countries ('transboundary consultation'; see also Section 5.2 below, 'Consultation') can also be consulted at this stage if the plan could significantly affect them.

Table 3.1 shows how consultation responses, in this instance submissions on the scope of an SEA, and actions taken in response to the consultation can be documented.

The content and nature of the SEA Scoping Report is not prescribed in legislation. However, in order to facilitate consultation with the relevant environmental and planning authorities, it is recommended that such a report should give an outline of:

- the geographic area involved (a map can be included);
- the nature of the plan, and its intended lifespan;
- the likely scale, nature and location of development within the area during the life of the plan (in broad terms);
- the methodology to be applied in the assessment, including draft Environmental Objectives;

3 Available at <https://enviromap.ie/>

4 <https://www.gov.ie/en/publication/3539d-strategic-environmental-assessment-sea/>

- in broad terms and where possible, the plan’s predicted significant environmental impacts;
- the scope and level of detail expected of the environmental report;
- including focused questions in the scoping report will help inform feedback from the SEA statutory authorities.

Table 3.1 *Example: Documenting SEA scoping consultation responses (Inis Cealtra Visitor Management and Sustainable Tourism Plan, Clare County Council, 2017a)*

Consultee	Key Issue Raised	SEA Response
Environmental Protection Agency		
	<p>The SEA ER should consider assessing the potential additional pressures, including seasonal pressures, on existing critical service infrastructure (drinking water/wastewater/waste) and transport related infrastructure.</p> <p>The Plan should include commitments for relevant infrastructure and any necessary associated upgrades/maintenance of existing infrastructure.</p> <p>Any priority commitments should where necessary be reflected in at LAP/Development Plan Level also.</p>	<p>Noted, pressures and capacity of existing critical services are described and assessed in this SEA ER. Please see Chapter Four, Environmental Baseline.</p> <p>Recommendations in relation to same are also included in this SEA ER. Please see Chapter Eight, Mitigation Measures.</p>
	<p>The SEA ER should ensure that the potential environmental effects of a likely increase in traffic volumes in the wider Mountshannon area resulting from implementation of the plan, is assessed and mitigated for where appropriate. The needs for additional parking during peak season should also be considered and assessed.</p>	<p>Noted, detailed traffic and transport studies were not undertaken as part of the plan preparation; however, existing transport provision and potential environmental effects are discussed in Chapter Four and Seven respectively in this SEA ER.</p>
	<p>Key additional plans/programmes are provided and attached in the submission; these include:</p> <ul style="list-style-type: none"> ● National Landscape Strategy ● National Biodiversity Plan ● National Planning Framework (under preparation) ● Regional Spatial and Economic Strategies (to commence) ● Water Framework Directive River Basin Management Plans (2nd cycle in preparation) ● Shannon Catchment and Flood Risk Assessment and Management Study ● National Mitigation Plan (in preparation) 	<p>Noted and are included in Chapter Three of this SEA ER.</p>

3.3 Tourism attribution and scoping in and out

The SEA should consider each of the environmental components listed in the SEA Directive: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; landscape; and the interrelationships between these factors.

If the plan is likely to have minimal or no impact on any environmental topic, then this component can be ‘scoped out’, with an explanation given for why it is being scoped out. Otherwise, the assumption is that the SEA will cover all the environmental components.

Where a plan is very unlikely to have significant impacts on a certain environmental component, where information about the impact depends on a specific location and the plan is not location-specific, or where all alternatives being compared would have similar impacts, it may make sense to ‘scope out’ impacts from analysis, with an explanation of why. Any scoping out of impacts should be documented, e.g. ‘the environmental component of landscape is being screened out as the tourism plan is not providing for any new built development, only activities, and relates to an urban destination that has no landscape designations’.

Table 3.2 provides guidance as to how SEA exclusions – issues that are scoped out of the SEA – can be documented.

Tourism plans in Ireland, to date, tend to facilitate and coordinate stakeholders (including local authorities, other government agencies, tourism operators, communities and visitors) in their activities in a way that is consistent with plans that have been subject to SEA and other assessments.

Understanding the hierarchy of statutory documents within which a tourism plan is positioned will be essential in identifying which developments and activities can reasonably be assigned to the plan being considered and which are already provided for and assessed by the existing planning framework, including provision of infrastructure and amenities for the general population.

Table 3.2 Documenting SEA scoping in and out of issues

Inside the scope of the SEA	Outside the scope of the SEA
Potential environmental effects will be identified and assessed at a strategic level.	Effects will not be assessed at a project-specific level. The SEA does not replace the need for project EIAs to be carried out where relevant.
The SEA will provide baseline information pertinent to the strategic issues associated with the potential development of tourism.	The SEA will not replace the need for developers to collect detailed project specific baseline data.
The SEA will inform the development and implementation of the tourism plan.	The SEA will not specifically address issues of land use or infrastructure planning policy, including that relating to consent procedures, but will cross-refer to other policies, plans and programmes where relevant.
The SEA will help identify areas where there may be opportunities for, or environmental constraints against, development.	The SEA will not demarcate specific sites or areas for development or avoidance but will identify the technical issues leading to constraints or opportunities.

Although the SEA Directive seeks to avoid duplication of assessment (it mentions this a number of times), it does require that cumulative effects (when the effects of the implementation of a plan occur in combination with those of other plans, programmes, etc.) are taken into account (see also Section 12.5 below, 'Cumulative effects'). Certain strategic planning issues may already have been determined – and their impacts assessed – at a national, regional or county level, whereas other more detailed issues will more appropriately be left for consideration at a local area plan level or even at the detailed project EIA level. The scoping process should seek to identify what supporting infrastructure and services (e.g. waste water, drinking water, transport, waste management, amenities) and other specific projects (such as signage programmes, visitor centres or car parks) are already provided for by the existing and previously assessed hierarchy of plans. These projects should be taken into account by the SEA in the consideration of cumulative in-combination effects. Additional advice on how best to ensure that tiering takes place effectively can be found in the EPA's Guidance on Strategic Environmental Assessment–Environmental Impact Assessment Tiering (EPA, 2021b).

Where the tourism plan introduces a new development or activity that has not been provided for or assessed elsewhere, or where the tourism plan introduces new detail, including that which may diverge from what is provided and assessed elsewhere, such initiatives should provide a focus for the assessment of direct effects attributable to the plan. Where these are proposed after a tourism plan is adopted, they should be subject to SEA screening and a determination made with respect to the potential for likely significant effects, where appropriate and relevant.

In scoping the environmental assessment for plans, therefore, it is important at the outset to identify the issues that are best dealt with at the scale and level of that plan, and the issues that are better dealt with at the level of other plans and projects elsewhere in the hierarchy. It is important to try to eliminate the potential for consideration of certain issues to be passed down to lower levels, unless necessary, as many important choices (for example, development standards) may have implications for the environment and may be better considered at higher, more strategic levels.

Table 3.3 provides guidance on how to consider tourism attribution in the context of an SEA for a tourism plan.

Table 3.3 Considering tourism attribution in the context of SEA scoping for a tourism plan

Issue being considered by SEA scoping	Should provide a focus in the SEA for direct effects attributable to the plan	Should provide a focus in the SEA for cumulative effects, in combination with the wider planning framework
Supporting infrastructure and services (e.g. waste water, drinking water, transport, waste management, amenities) and other specific projects (such as signage programmes, visitor centres or car parks) that are already provided for by the existing planning framework and that have already been subject to environmental assessment		✓
New supporting infrastructure and services or new other specific projects (such as signage programmes, visitor centres or car parks) that are being introduced by the tourism plan and have not been provided for and assessed elsewhere	✓	
New detail, including that which may diverge, around developments or activities that are already provided for and assessed elsewhere, that is being introduced by the tourism plan	✓	

4. Outline of the Contents and Main Objectives of the Plan

Key points:

- The environmental report needs to describe the contents and main objectives of the plan.
- It can also give information on the more technical aspects of the plan.

Annex I (a) of the SEA Directive requires the environmental report to include 'an outline of the contents and main objectives of the plan'. As such, one of the first chapters of the environmental report should briefly describe the plan and its context in the planning process.

This should include a description of:

- who is preparing the plan and why;
- the plan area;
- the area over which the plan could have impacts (often referred to as 'the zone of influence of the plan', which may be wider than the plan area);
- the time period over which the plan will apply;
- the plan objectives.

It can also include a description of the process used to develop the plan, and a summary of the tourism-related uses and activities covered by the plan.

4.1 Plan contents

Box 4.1 provides an example of how plan provisions could be summarised in a focused way. Table 4.1 shows how a plan's objectives could be presented. Not all of this information will be available early in the SEA process, but it should be included in the environmental report.

Box 4.1 *Example: Summary of plan content* (Tourism Masterplan for the Shannon Region, Waterways Ireland, 2020a)

2.2.1 Key elements of the masterplan

Waterways Ireland is the Competent Authority for the management of the navigable waterways on the island of Ireland, as outlined in Section 1.0, and is responsible for carrying out the Tourism Masterplan for the Shannon Region. The key aims of this masterplan are to:

1. Identify **Products and Themes** with the most potential and offering a unique differentiator
2. **Destination Vision** – establish a shared view of the destination’s desired qualities (and profile) in the long-term, including land-based activities and attractions that will complement the water-based activities, and suggest best options to deliver on this.
3. Make **recommendations on other influencing factors** that will stimulate a varied product offering and quality experience e.g. Policy changes (Bye laws), innovative programmes to support private sector (tax incentives) or investment in infrastructure.

In implementing the Masterplan for the Shannon navigation, the objectives are to:

- Increase the distinctiveness and visitor appeal of the area and diversify the offer;
- Attract new visitors;
- Encourage repeat visits
- Increase dwell time
- Drive economic and social benefit;
- Deliver authentic experiences;
- Be of scale;
- Protect environmental sensitivities; and
- Provide for sustainable development.

Table 4.1 *Example: Identification of plan objectives* (Sceilg Mhichil World Heritage Property Management Plan, National Monuments Service, 2021a)

2.2 Objectives of the Plan

The outline Management Objectives of the Plan are presented in Table 2-1 below.

Table 2-1 Plan Objectives

Objectives	
1	To have in place an effective management framework to protect the Outstanding Universal Value of Sceilg Mhichíl.
2	To improve liaison with local interest groups and other relevant parties.
3	To preserve the cultural heritage of the island and sustain its’ Outstanding Universal Value.
4	To identify and conserve the natural heritage of the island.
5	To further promote the importance of the WHS to ensure continued coordination by government departments, agencies and other statutory bodies with responsibilities for making and implementing national policies and undertaking activities that may impact on Sceilg Mhichíl and its environs.
6	To manage visitors to Sceilg Mhichíl effectively.
7	To maintain an appropriate standard of safe, regulated visitor access system that supports conservation aims.
8	To increase understanding of and appreciation for Sceilg Mhichíl and its environs.
9	To maintain and enhance the landscape setting of Sceilg Mhichíl.
10	To monitor those factors with the potential to impact on the built and natural environment of Sceilg Mhichíl.
11	To establish a research framework for Sceilg Mhichíl.

4.2 Scope of application and implementation

Stand-alone tourism-specific plans (or policies, programmes, strategies, etc.) are not required to be prepared by legislation. Tourism is, however, already provided for by various statutory documents setting out public policy for, among other things, land use development and activities, infrastructure, sustainable development, environmental protection and environmental management. These plans provide the accommodation, movement and hospitality facilities that are the fundamentals on which the tourism sector is based. All these documents will have been subject to their own environmental assessment processes, as relevant, and form part of the decision-making and consent-granting framework. It is therefore important for tourism plans, and associated SEAs, to explain their scope of application and how they will be implemented – including identifying collaborators, funding mechanisms and whether the plan is part of the framework for granting consent. Box 4.2 provides an example of how this has been done. Section 6, ‘Relationship with Other Relevant Plans and Programmes’, and Section 3.3, ‘Tourism attribution and scoping in and out’, should also be referred to.

Box 4.2 *Example: Scope of application and implementation* (Clew Bay Destination Experience Development Plan, Fáilte Ireland, 2021a)

Implementing the Plan will involve Fáilte Ireland helping to facilitate, promote, support and coordinate stakeholders (including local authorities, other government agencies, tourism operators, communities and visitors) in their activities in a way that is consistent with existing and emerging plans that have been subject to environmental assessment. The Plan does not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent.

Fáilte Ireland provides funding for sustainable tourism projects that emerge as part of specific, competitive, themed and time-bound grant schemes or as part of wider strategic partnerships. These include projects relating to land use, infrastructural development and land use activities and attractions. Reference made to such projects included in the Plan does not guarantee funding. While funding is provided to certain projects, Fáilte Ireland is not the developer.

In order to achieve funding (including promotion) for land use or infrastructural development or land use activities from Fáilte Ireland, Fáilte Ireland’s stakeholders shall be required to demonstrate compliance with measures relating to sustainable development, environmental protection and environmental management contained within the following Fáilte Ireland published documents:

- Wild Atlantic Way Operational Programme Appendix 5 ‘Site Maintenance Guidelines’ and other relevant measures from the Fáilte Ireland visitor and habitat management guidelines series (and any subsequent replacements); and
- Wild Atlantic Way Operational Programme Appendix 6 ‘Environmental Management for Local Authorities and Others’ (and any subsequent replacements).

In order to be realised, projects included in the Plan (in a similar way to other projects from any other sector) will have to comply, as relevant, with various legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licencing requirements as appropriate) that form the statutory decision-making and consent-granting framework, of which the Plan is not part and does not contribute towards.

4.3 Plan development process

This early chapter in the environmental report can also explain the process by which the plan is being developed. Questions relating to this process of ‘who’, ‘why’, ‘what’, ‘where’ and ‘how’ are likely to be of interest. Tourism plans are prepared and implemented by a wide range of bodies and organisations. Those involved can include Government Departments, Fáilte Ireland (the National Tourism Development Authority, whose role is to support long-term sustainable growth in the economic, social, cultural and environmental contribution of tourism to Ireland), Tourism Ireland (responsible for marketing the island of Ireland overseas as a leading holiday destination), planning authorities, communities, representative groups and industry.

Figure 4.2 provides an example of the type of background information that might be included in the development of a plan.

Figure 4.2 *Example: Plan development process* (Lough Derg Destination Development Plan, Tipperary County Council, 2020a)



5. Public Consultation/Stakeholder Participation

Key points:

- Consultation with, and participation of, the public, environmental authorities and key stakeholders is a core element of good plan-making.
- It is a requirement of the SEA process under the SEA Regulations.

5.1 Consultation

Consultation with, and participation of, the public, statutory environmental authorities and key stakeholders is a core element of good plan-making and a requirement of the SEA process.

The statutory environmental authorities must be consulted when screening⁵ for the need to undertake SEA and, when undertaking SEA, early in the SEA process on the scope and level of detail of the information that must be included in the environmental report.

The Department of Housing, Local Government and Heritage's website⁶ provides the most up-to-date contact details for the statutory environmental authorities that must be consulted as part of SEA screening, taking account of transfers of functions between Ministers since the SEA Regulations first identified the statutory environmental authorities. The statutory environmental authorities for the purposes of plans falling under SI 435 of 2004, as amended, currently are:

- Environmental Protection Agency;
- Department of Environment, Climate and Communications;
- Department of Housing, Local Government and Heritage;
- Department of Agriculture, Food and the Marine.

5 There is separate EPA Good Practice Guidance on SEA Screening (2021a) that should be consulted when screening for the need to undertake SEA is being undertaken.

6 <https://www.gov.ie/en/publication/3539d-strategic-environmental-assessment-sea/>

Scoping consultations can be done very early in the SEA process (see also Section 3, 'Scoping').

- It is good practice to consult more widely at this stage and throughout the plan-making/SEA process, for instance on the identification of issues and alternatives, and on an early version of the plan.
- The public, statutory environmental authorities and relevant other Member States⁷ must be consulted on the draft plan and environmental report.
- A copy of the adopted plan and the 'SEA statement' (see Section 16), including environmental monitoring arrangements that will be carried out during plan implementation, should be sent to the statutory environmental authorities. The competent authority should also publish notice of the preparation of the draft plan and for adoption of the plan and make the plan and associated SEA documents publicly available, on the competent authority's website and in its offices.

It is useful to explain what consultation has been carried out so far, and how the consultation comments have been taken into account. It can also be useful to include questions in the scoping report to prompt feedback on specific areas of interest.

Table 3.1 in Section 3, 'Scoping', shows how consultation responses, in this instance submissions on the scope of an SEA, and actions taken in response to the consultation can be documented. Figure 5.1 shows how public consultation responses, including those in relation to environmental protection and sustainable development, have been documented, setting a direction for the plan in question.

The information on how comments have been taken into account by the planning team not only shows that the planning team is responsive to comments but will also be helpful when preparing the 'SEA statement' discussed at Section 16 of this guidance note (which provides further details regarding how submissions from the public and stakeholders should be taken into account by the process).

7 Article 7 of the SEA Directive requires transboundary consultation where transboundary impacts are likely. As identified in the Department of Housing, Local Government and Heritage's 2022 'Strategic Environmental Assessment – Guidelines for Regional Assemblies and Planning Authorities', prior to the departure of the UK from the European Union in 2020, the most likely occurrence of transboundary consultations by Ireland pursuant to the SEA Directive was with authorities in Northern Ireland in the context of the preparation of plans that were considered likely to have significant cross-border environmental effects. However, since the UK has left the European Union, any transboundary consultations can no longer be formally undertaken with Northern Ireland under the auspices of the EU SEA Directive but may, in the future, be subject to specific UK and/or Irish legislation, for example, legislation implementing the SEA (Kiev) Protocol to the UNECE's Convention on Environmental Impact Assessment in a Transboundary Context (the Espoo Convention). In the interim, it is noted that Article 393 of the UK/EU's Trade and Cooperation Agreement, agreed on Christmas Eve 2020, reaffirms the UK and EU's commitments to procedures for evaluating the likely impact of a proposed activity on the environment and, where specified projects, plans and programmes are likely to have significant environmental, including health, effects, this includes an environmental impact assessment or a strategic environmental assessment, as appropriate. It is therefore recommended that the competent authority for the relevant tourism plan continue to engage as normal with Northern Ireland's authorities. Competent authorities should offer the opportunity for Northern Ireland authorities to hold transboundary consultations on relevant plans of Irish authorities, in compliance with general principles of transboundary consultation in the SEA Directive and in the context of consultation, cooperation and action within the island of Ireland on matters of mutual interest, North and South, through the North–South Ministerial Council. Technical guidance on arrangements for transboundary consultations with Northern Ireland concerning SEA of plans and programmes will be updated in due course.

Figure 5.1 *Example: Documenting public consultation responses* (Lough Derg Destination Development Plan, Tipperary County Council, 2020b)



Key local insights

Ideas for developing the destination were discussed at the workshops and in follow on conversations with stakeholders, these are summarised below:

- Take a **hub and spoke** approach – offer visitors a great place to stay with plenty to do nearby – creative curation of clusters of existing experiences can bring quick results
- We need to make the experiences **easy to consume**
- The southern half of the lake is already well on the way to positioning itself as a key regional hub within Ireland’s Hidden Heartlands for **high adrenaline activities on and off the water**
- Developing **Portumna as a destination town** would be a game changer – its geography positions it at the junction of the **two strategic spines of the Ireland’s Hidden Heartlands** brand experience
- The ongoing work to present **Holy Island** in new ways to visitors can have knock on benefits for the **whole central region of the lake** on both the Clare and Tipperary sides if easy ways for visitors to cross the lake are progressed
- **The environment is the asset**
- **Off-road connections beyond the immediate lake context** are important – south to Limerick and north to Meelick and Clonmacnoise – with potential for developing experiences along the way which reveal the interaction of people and water through history such as the Pilgrimage journey and the harnessing of the river’s power at Ardnacrusha
- The comprehensive existing audits of heritage and natural assets provide a **strong basis for curating experiences** for visitors, along trails, and within easily understood geographies
- **Lakeshore forests** in state ownership have a key role to play in deepening visitor experiences in key locations around the lake
- **Digital is everything** and business websites are the shop window for the destination
- **Blueway enterprise activation and support** is crucial
- Pick a few things and **do them well**
- We need to ensure visitors **understand distances** within the destination and the **options for moving around** the intricate land and water geography
- The current use of existing visitor infrastructure is **unbalanced**
- **Rural depopulation** is happening – particularly in the northern and north western areas
- Different parts of the lake are at **varying stages of destination development**
- There is still much **scope for new businesses** to take advantage of the opportunities provided by new infrastructure development

6. Relationship with Other Relevant Plans and Programmes

Key points:

- The aim of this section, and that on environmental protection objectives, is to put the plan into context: what other plans, programmes and objectives affect the plan, and how are other plans etc. affected by the plan?
- Focus on *key relevant* other plans, programmes and environmental objectives, rather than trying to be comprehensive.

The relationship with other relevant plans and programmes, as well as the identification of relevant environmental protection objectives, helps to put the tourism plan into context: what other plans, programmes and objectives affect the plan, and how other plans, programmes and projects are affected by the plan. These effects may occur over a range of environmental criteria, such as land use planning, biodiversity, water services, transport, air quality, water quality and climate action.

Identifying key plans, programmes and environmental objectives relevant to the plan and at the appropriate level in the hierarchy (a county plan may be more relevant than a national plan to a local plan, for example) being assessed in the main body of the environmental report, rather than trying to be comprehensive, can help focus attention on the most important relationships. Other, less important plans, programmes and environmental objectives can be identified in appendices for completeness.

6.1 Hierarchy of plans, programmes projects and environmental assessment

Tourism plans will sit alongside or within a hierarchy of statutory documents setting out public policy for, among other things, tourism, land use development and activities, infrastructure, sustainable development, environmental protection and environmental management. These plans provide the accommodation, movement and hospitality facilities that are the fundamentals on which the tourism sector is based. All these documents will have been subject to their own environmental assessment processes, as relevant, and form the decision-making and consent-granting framework. The particular hierarchy may change depending on the characteristics of the relevant tourism plan.

The National Planning Framework (NPF) sets out Ireland's planning policy direction up to 2040. The NPF is implemented through Regional Spatial and Economic Strategies (RSEs) and through lower tier Development Plans and Local Area Plans. The RSEs set out objectives relating to tourism development that have been subject to environmental assessment, including those relating to, for example: enhancing provision of tourism and leisure amenity; promoting tourism activity; developing a road network and public transport services, facilitating improved visitor access and longer dwell times; developing walking and cycling trails, opening greater accessibility to the marine and countryside environment by sustainable modes; and facilitating appropriate tourism development, including that relating to greenways, blueways and peatlands. The RSEs have provided a framework for the assessment and review of existing local

authority development plans and local area plans, which already include various provisions relating to land use, tourism and infrastructure. These Development Plans and Local Area Plans have been, are being or will be reviewed and prepared to be consistent with the RSEs and they are likely to elaborate on the framework for tourism development provided for by the RSEs. Such reviews are also subject to environmental assessments.

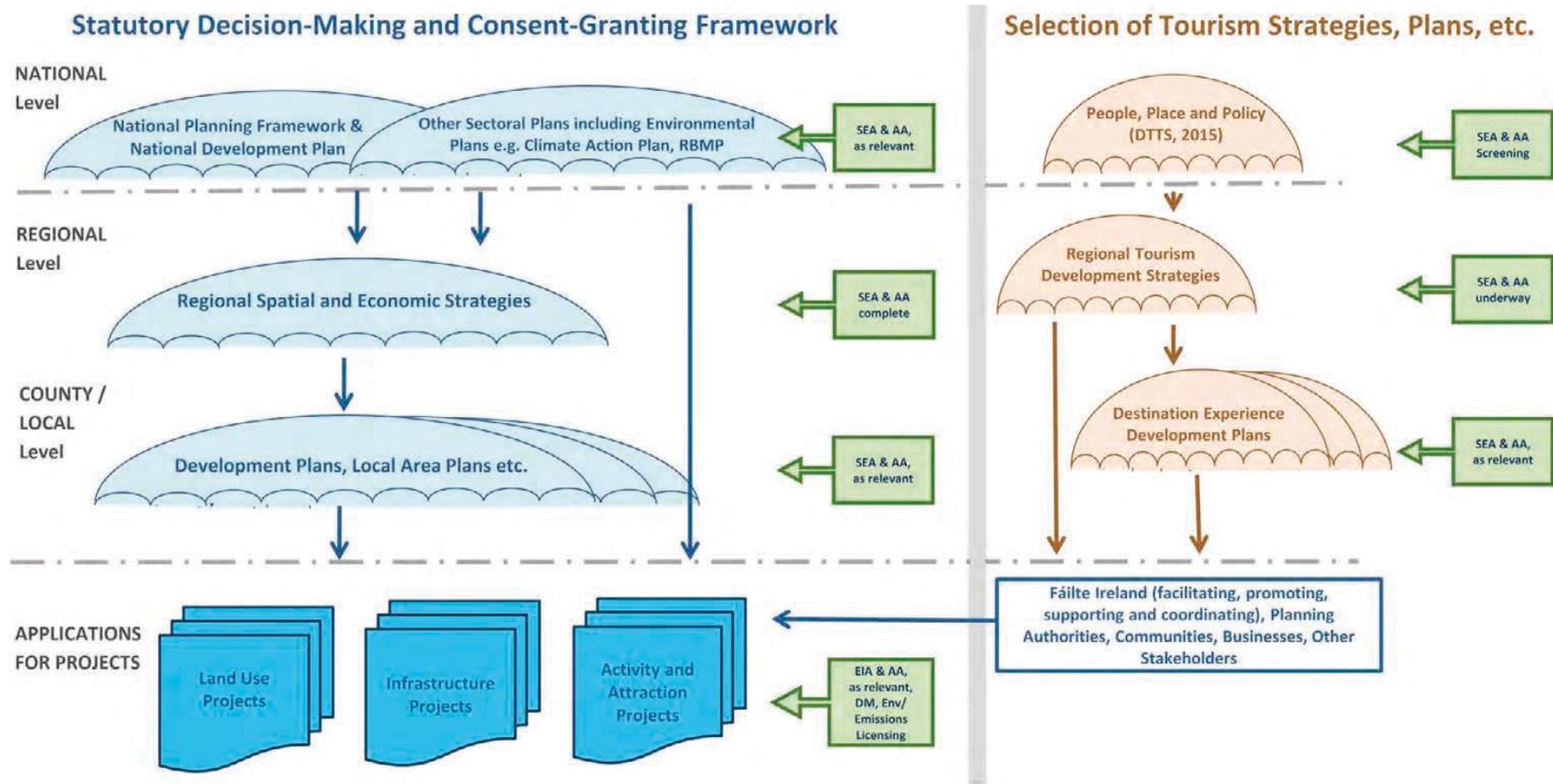
'People, Place and Policy – Growing Tourism to 2025' is a Department of Tourism policy statement that aims to ensure that the tourism sector continues to grow in a sustainable manner. It represents a key national policy document for the tourism sector. Although the policy is centred on Ireland achieving its full potential as a destination for overseas tourism, it acknowledges that the domestic tourism market underpins the range of visitor accommodation and services that provide competitive advantage to Ireland in the international market; therefore, many of the policy statement's measures will also benefit the domestic tourism sector. Tourism plans should consider and align with, as relevant and appropriate, the policy statement.

Implementation of tourism plans needs to be consistent with and conform with the NPF, the RSEs and lower-tier land use plans, including provisions relating to sustainable development, environmental protection and environmental management that have been integrated into these documents including through SEA and AA processes. In order to be realised, projects included in tourism plans (in a similar way to projects from any other sector) will have to comply, as relevant, with various legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessments and Environmental Impact Assessment, as appropriate) that form the statutory decision-making and consent-granting framework.

Figure 6.1 provides an example that shows how a selection of tourism plans relate to other plans and programmes that form part of a statutory decision-making and consent-granting framework. This example also identifies requirements relating to environmental assessment and where applications at project level fit. The figure identifies, in **grey** colour, different spatial decision-making levels (national, regional county/local and applications for projects). To these levels, the figure aligns both examples of associated plans, programmes, strategies and projects from the statutory decision-making and consent-granting framework in **blue**, and examples of a selection of tourism policy, plans and strategies in **brown**. The **green** boxes indicate a selection of applicable environmental assessment requirements. With dividing lines between the different levels and arrows connecting the examples, the figure indicates linkages between the levels and examples. The text in the bottom right-hand corner of the figure – 'Fáilte Ireland (facilitating, promoting, supporting and coordinating), Planning Authorities, Communities, Businesses, Other Stakeholders' – indicates the role of the competent authority (Fáilte Ireland) and other stakeholders in implementing the Tourism Plans through progressing applications for development under the statutory decision-making and consent-granting framework.

Understanding this hierarchy, including the relationships between the different policies, plans, strategies, etc., the scope of application of the tourism plan in question and how it will be implemented, is essential in identifying: which developments and activities can reasonably be assigned to the plan being considered; and which are already provided for and assessed by the existing planning framework, including as infrastructure and amenities for the general population (refer also to Section 3.3, 'Tourism attribution and scoping in and out').

Figure 6.1 Example: How selected tourism plans relate to other plans, programmes and projects (includes Environmental Assessment requirements) (Fáilte Ireland, 2022c)



7. Relevant Aspects of the Current State of the Environment and the Likely Evolution Thereof, Without Implementation of the Plan

Key points:

- The baseline description should discuss the likely future without the plan as well as current conditions.
- Environmental issues can be 'scoped out' if they are not relevant to the plan, provided that an explanation is given of why they are scoped out.
- Full use should be made of information that would anyway be gathered as part of the plan-making process.

The description of the current state of the environment is a key part of SEA, as it sets a baseline against which the plan's impacts can be assessed and monitored, helps to identify existing environmental problems, and allows data gaps to be identified and, if necessary and where possible, filled.

Annex I (b) of the SEA Directive requires the environmental report to include a description of:

- 'relevant aspects' of the current state of the environment – this implies that some aspects may not be relevant and can be 'scoped out';
- likely evolution of the environment without implementation of the plan;
- any existing environmental problems relevant to the plan.

The 'relevant aspects' of the current state of the environment will be informed by the SEA Scoping process described under Section 3, 'Scoping'.

Only 'relevant aspects' of the current state of the environment need to be included in the environmental report, and more generally the environmental report only needs to include 'information that may reasonably be required taking into account':

- current knowledge and methods of assessment;
- the contents and level of detail in the plan or programme;
- the stage of the plan or programme in the decision-making process;
- the extent to which certain matters are more appropriately assessed at different levels in the decision-making process to avoid duplication of assessment. (Article 5.2 of the SEA Directive and transposing Regulations, as amended, including Article 11(2) of SI 435 of 2004, as amended)

7.1 Current state of the environment

The description of the current state of the environment should cover the components listed in the SEA Directive – biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and

the interrelationship between the above factors – unless a good reason is given for why certain issues should be ‘scoped out’. It is worth noting that the wording in the Directive (Annex I(f) related to this is ‘including on issues **such as** biodiversity, population’ (emphasis added). This can be interpreted as suggesting that there may be other topics also.

Tourism plans are prepared for a variety of areas (national, regional and destination, for example).

The current state of the environment should describe, for example:

- the spatial and seasonal spread of existing levels of tourism across the relevant region/area/destination, including visitor levels, trends, relevant activities and developments;
- how the following existing infrastructure within the area to which the plan relates, and beyond where relevant, currently services tourism, including details on capacities and trends:
 - transport (to and within the region/area/destination);
 - water services – waste water and drinking water;
 - waste management;
 - telecommunications;
 - energy transmission.
- how use of this infrastructure currently interacts with the environment, for example:
 - generation or minimisation of transport emissions to air;
 - conveyance of visitors to/through ecologically sensitive areas;
 - generation or minimisation of waste water emissions to water;
 - interaction between drinking water usage and source water bodies/wider environment and population;
 - generation or minimisation of litter in sensitive areas;
 - minimisation of carbon footprint.
- the environmental components that may be affected by the plan/programme, which are prepared for areas that are environmentally sensitive (such sensitivities are often sustaining resources for tourism, for example, natural/semi-natural habitats, valued landscapes and cultural heritage). Other environmental issues, such as those relating to infrastructural capacity, may not be the primary attractors of visitors, but may be adversely affected by increases in tourism – potentially impacting on future tourism potential of areas.

Where possible, when describing the current state of the environment, consider utilising the available data for the scale at which the plan is being prepared. In other words, a national level tourism plan would be informed by national level environmental baseline information. Lower down the hierarchy, more regionally and locally specific information should, where available, be taken into account.

7.2 Identifying and presenting the data

The EPA's State of the Environment report series *Ireland's Environment – An Integrated Assessment* can be a good starting point for baseline data collection and for recognising the overall environmental challenges facing Ireland. Plans at all levels in the planning hierarchy (tourism in this case) should consider how these challenges can be addressed.

During engagement with various bodies including the statutory environmental authorities, asking questions regarding additional data sources can help further refine the scope of the assessment.

For cyclical plans, the monitoring data from the previous plan and SEA will, where available, also be useful. The EPA has published 'Good Practice Guidance on SEA Statements and Monitoring' (EPA, 2020b), which can be a useful reference document when preparing monitoring measures and SEA Statements.

Existing project-level EIAs may also provide useful site-level data where the plan is spatially specific. EPA Guidance on Strategic Environmental Assessment–Environmental Impact Assessment Tiering (EPA, 2021b) might also be useful to consider.

This chapter of the environmental report can also document the location of any Special Protection Areas and Special Areas of Conservation, for example, that might be affected by the plan, why they have been designated, and the kinds of impacts that they are vulnerable to, as a link to the appropriate assessment/Habitats Directive Assessment process.

The description of baseline can be in the form of text, mapping, tables and graphs or a combination (see example at Figure 7.1).

Mapped data can be helpful in facilitating the direction of development towards robust, well-serviced and well-connected areas – thereby facilitating the general avoidance of incompatible areas in the most sensitive, least well-serviced and least well-connected areas. Where environmental sensitivities occur, there is an increased likelihood that development will conflict with these sensitivities and cause environmental deterioration. The EPA–OSI funded Environmental Sensitivity Mapping Webtool⁸ can help identify what environmental sensitivities are within the study area, to inform the SEA and the plan/programme/strategy being prepared. However, the occurrence of environmental sensitivities does not preclude development; rather it flags at a strategic level that, if tourism-related development or activities are to be provided for, mitigation measures will need to be integrated into the relevant plan in order to ensure that implementation of the plan contributes to the protection of the environmental sensitivities in question.

8 <https://enviromap.ie/>

The EPA's Geoportal site (<http://gis.epa.ie/>) provides spatial environmental data, and www.enviromap.ie is a web-tool focused specifically on environmental sensitivity mapping for SEA. The EPA's manuals on GIS for SEA and Environmental Sensitivity Mapping provide further guidance on GIS and mapping techniques. Weighting can also be applied in a GIS system, such as the ESM Webtool, to illustrate the relative importance and significance of relevant datasets: different datasets can be assigned different weights (e.g. more weight for internationally important than locally important biodiversity sites) and overlaid. This allows for the generation of map(s) illustrating cumulative vulnerability/constraints, such as that shown by the environmental sensitivity mapping at Figure 7.2. This also can help to identify sensitive areas where development should be avoided or mitigated.

7.3 Likely evolution without the plan

Annex I (b) of the SEA Directive specifies that the baseline description should also include a description of 'the likely evolution [of the current state of the environment] without implementation of the plan'. The plan or programme's impacts can then be determined as the difference in environmental conditions with and without the plan. Generally, this means a 'business as usual' scenario where the current plan continues into the future, rather than a 'no plan at all' scenario; and typically, it means looking forward for the length of time of the new plan (say 20 years).

Under a 'business as usual' scenario, the situation in 20 years may be quite different than the current situation: for instance, air pollution levels may have fallen as a result of tightening European legislation, but biodiversity may have worsened. Boxes 7.1 and 7.2 provide examples of how the likely evolution of the environment without implementation of the plan has been described.

Figure 7.1 *Example:* Description of current state of cultural heritage (Sceilg Mhichil World Heritage Property Management Plan, National Monuments Service, 2021a)

Cultural Assets Overview

Sceilg Mhichíl (Great Skellig) is one of two rocky islands—the other being Little Skellig— known as the Skellig Rocks, situated in the Atlantic Ocean off the coast of the Iveragh Peninsula, Co. Kerry. Geologically, these islands are formed of Old Red Sandstone and are part of the same formations as the Macgillycuddy’s Reeks and the Caha mountains. Sea level rise separated the Skelligs from the mainland making them islands, though both clearly maintain their mountainous form, projecting from the sea. Sceilg Mhichíl, the larger of the two islands is 218m above sea level and is 21.9 hectares in extent. The location and natural setting of Sceilg Mhichíl is spectacular in itself; but it is its remaining cultural heritage remains that provide it with its Outstanding Universal Value. It is arguably the most spectacularly situated early medieval island monastic site in Ireland and globally and ‘It represents a unique cultural achievement, illustrating a significant period of history and civilisation that has disappeared’ (NMS, 2020). Its location at the western edge of the Europe which was then thought as the edge of the known world, Sceilg Mhichíl was the chosen destination for a small group of ascetic monks who, in their pursuit of greater union with God, withdrew from civilisation on the mainland to this remote and precipitous rock. Sometime between the sixth and eight centuries, a monastery was founded there producing one of the most dramatic examples of the extremes of Christian monasticism. The religious community left for the mainland sometime in the thirteenth century but Sceilg Mhichíl continued as a place of pilgrimage. Due to its setting and cultural heritage remains and traditions there is no comparable archaeological monument to Sceilg Mhichíl currently known.

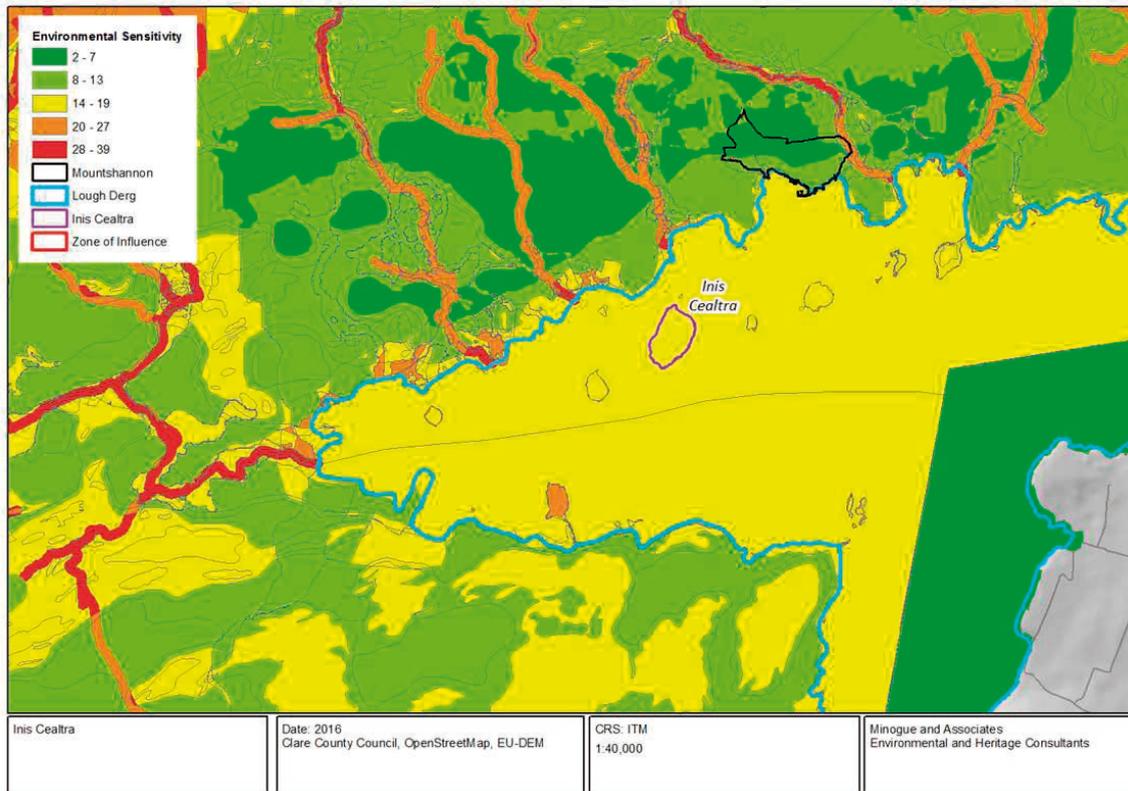
In addition, Sceilg Mhichíl has important nineteenth-century evidence for the early establishment and history of lighthouses on the Irish coast (Taylor, 2006; O’Reilly, 2018). Two separate lighthouses were constructed on the island. Both were particularly challenging building projects due to the location and remoteness of the island. A rock-cut road was also constructed to connect the two lighthouses to the pier at the eastern end of the island. This pier remains the primary landing place for island visitors today,

Sceilg Mhichíl (Great Skellig) island is a National Monument in State ownership, No. 61.⁸ In 1996 UNESCO inscribed the island onto the World Heritage List in recognition of its Outstanding Universal Value.⁹ The island is located in the barony of Iveragh and the civil parish of Killemlagh. It comprises a single townland of Sceilg Mhichíl or Skellig Rock Great and its name derives from the Irish translated as ‘the steep rock of Michael’; Michael being the Archangel Saint Michael.¹⁰



Recorded archaeological monuments (indicated by red dots)

Figure 7.2 Example: Environmental sensitivity mapping (Inis Cealtra Visitor Management and Sustainable Tourism Plan, Clare County Council, 2017b)



Box 7.1 Example: Description of likely evolution of the environment without the plan (National Monuments Service, 2021a)

The likely future changes to Sceilg Mhichíl and the surrounding area in relation to the relevant SEA topics are described below:

Biodiversity, flora and fauna

- Resident cliff nesting bird populations on the Skellig islands are likely to remain at similar levels as the present day. Burrowing bird species such as Atlantic puffin, Manx shearwater and European storm petrel may however be subject to increased disturbance through deteriorating physical conditions of the site and increased numbers of visitors.
- Disturbance of cetaceans and pinniped species in the waters surrounding Sceilg Mhichíl could potentially increase due to an increased number of vessels circulating around the island.
- Bird populations could be at severe risk from potential introduction of predatory mammalian.
- Increased disturbance to nesting bird species during the breeding season, leading to reduction in breeding success and population declines, should helicopter tours and use of drones increase.

Climatic factors

- Current and predicted changes to the local weather conditions, such as change in dominant wind direction and increased severity of winter storm events, will continue into the future.

Cultural, architectural & archaeological heritage

- Boats and visitor numbers to island and 'off island' may increase without monitoring and cause erosion to monuments and underlying deposits, effects including rockfalls, soil erosion, degradation of monuments and features such as steps, as well as negative impacts on the location's spiritual integrity.
- The lack of a future interpretative base/centre that would clearly show the international significance of the site may lead to a lack of awareness of the reasoning behind Sceilg Mhichíl's World Heritage Status inscription, its historic integrity and its spiritual significance may wane. Should this occur it may be difficult to re-establish spiritual significance and historic integrity.
- Lack of monitoring of the consolidated monuments and structures may lead to their deterioration and ultimately their destruction due to lack of mitigation in relation to, for example, climate impact.
- Ongoing research on the island's cultural heritage, both material and intangible, may be stunted.
- Loss of World Heritage Status and loss of recognition of Sceilg Mhichíl as a place of Outstanding Universal Value.

Soil

- Due to increasing frequency and severity of extreme weather conditions in the vicinity of Sceilg Mhichíl, erosion and rockfall events are likely to occur with increasing frequency on Sceilg Mhichíl.

Landscape and visual amenity

- The present landscape and seascape, through deterioration of the site due to the effects of climate change, may be negatively impacted in the long-term.

Material assets and infrastructure

- Necessary renovations of the existing lower lighthouse complex may not proceed, leading to deterioration of the structures and inability for their use by workers and visitors to the island.

Population and human health

- No further safety structures and procedures may be implemented on the site, potentially leading to more hazardous conditions for both workers and visitors on the island.
- The current permit system for commercial boats to take visitors to Sceilg Mhichíl would likely remain in its current iteration, with 15 operators competing in a commercial tender on a 3-year basis.

Box 7.2 *Example: Description of likely evolution of the environment without the plan*
(West Cork Destination Experience Development Plan, Fáilte Ireland, 2020c)

The likely evolution of the environment in the absence of a plan would resemble the environmental effects that are described for Alternative 1 (Business as Usual):

As identified in the Plan, there are various strengths associated with the current tourism development situation include:

- Diversity of coastal landscapes and ecosystems.
- Unique and welcoming small towns in close proximity to each other.
- Array of opportunities to build 'slow' tourism.
- Sense of intimacy balanced with a 'cosmopolitan' feel.
- Energy and commitment to sustainability and maintaining local traditions and values.
- Quality of the food, diversity of local artisan food producers – highest numbers in Ireland.
- Well established recognition for local foods and food specialisms such as Clonakilty black pudding.
- Rich depth and colour in local stories – layers of history.
- Distinctive and vibrant maritime heritage.

However, there are a number of weaknesses associated with this situation, including:

- Seasonality.
- Limited public transport.
- Reduction of sea routes.
- No traffic management systems in place.
- Roads not suited to high volumes/signage to towns.
- Insufficient focus on the strengths of the area – its potential for 'slow' travel.
- Insufficient marine infrastructure for visiting boating vessels.
- Accommodation – varied needs - to include parking for camper vans near amenities.
- No significant markers for start or end of Wild Atlantic Way.
- Insufficient experiences, particularly in non-peak periods.
- Staff shortages and issues relating to affordable housing for staff.
- Marketing and positioning of West Cork experiences.

Sustainable development, environmental management and environmental protection under Alternative 1 is provided through the existing statutory planning and consent framework. These measures would contribute towards positive effects on the protection and management of all environmental components (see Table 7.3).

Tourism related development would continue to be planned for and consented through the existing statutory planning and consent framework. Potential adverse effects (see Table 7.3) would continue to be mitigated through that process.

In the absence of a Plan, there would continue to be an increase in tourist numbers – consistent with the development of tourism over many decades. The most popular locations in the West Cork Coast area would see the largest increases in visitors, which would occur during the peak season. This would give rise to greater concentration of tourists during peak seasons and in the most popular locations thereby increasing potential environmental effects on all components and peak load additions on various infrastructure in particular locations/at particular times.

Contributions towards an increase in travel related greenhouse gas and other emissions to air, including from aviation, would not occur as a result of a Plan that seeks to lengthen dwell time and grow visitor numbers, however increases in tourist numbers would occur. Similarly, the positive mitigatory effects as a result of provisions of a Plan, such as those relating to sustainable mobility, traffic management and compliance with climate adaptation and management plans/strategies would not be provided for.

There would be one layer of mitigation under Alternative 1, through the existing statutory planning and consent framework.

8. Environmental Characteristics of Areas Likely to be Significantly Affected

Key points:

- The level of detail of the SEA should correspond to the level of detail of the plan.
- Overlay maps are particularly useful for site-level assessments.

Annex I (c) of the SEA Directive requires the environmental report to describe 'the environmental characteristics of areas likely to be significantly affected' by the plan. This is a 'zoom down' to areas where the plan proposes significant change. This is particularly relevant for plans that propose areas or sites for development or that are looking to expand significantly tourism-related activities over the lifetime of a particular plan. Environmental conditions in those areas might be different from the overall plan area, requiring location-specific mitigation measures.

The siting of these types of developments needs to take account of the environmental sensitivities within and adjacent to the plan area, in addition to ensuring that the environment in that area can absorb further development (tourism in this case).

Aspects such as holiday homes can add to ribbon development if not carefully planned, sited and developed, for example.

The description of these environmental characteristics will be guided by the scope of the SEA (see Section 3, including 3.3 'Tourism attribution and scoping in and out').

The level of detail (and summary of the environmental characteristics) of the SEA should correspond to the level of detail of the plan/programme.

Combining constraints on a single map, such as those used in environmental sensitivity mapping, can be useful to inform site-level assessments.

Figure 8.1 provides an example of this 'zoom down' to areas within a region, with characteristics, sensitivities, effects and mitigation all identified.

Figure 8.1 Example: Environmental characteristics of particular areas (Wild Atlantic Way Operational Programme, Fáilte Ireland, 2015)



Natural Heritage

Zone Characteristic Features

- A.** Mountains, bogs, rocky coasts, islands and scattered farming [Western lowland blanket bog, wet heaths, permanent lowland wet meadows, lowland grasslands and coastal communities]
- B.** Coastal farming, Mixed sandy and rocky coasts, mountains, bogs [Lowland Grasslands, wet heaths, permanent lowland wet meadows and coastal communities and western lowland blanket bog]
- C.** Mountains, bogs, rocky coasts, islands and scattered settlements [Western lowland blanket bog, wet heaths, permanent lowland wet meadows and coastal communities]
- D.** Coastal farming Rocky Coasts, Bogs [Lowland and marginal grasslands and wetlands and wet heaths]
- E.** Mountains, bogs, rocky coasts, islands and scattered farming [Western lowland blanket bog, dry heather, wet heaths and heathy grassland, lowland grasslands]

Regional Natural Heritage Assessment				
Zone	Character	Sensitivity	WAW Effects	Mitigation
A	Donegal Peninsular Mountains, bogs, rocky coasts and scattered farming with scattered settlements. Contains extensive areas of designated habitats, species and features.	Generally high sensitivity both to new development and activities associated with maintenance and renewal of existing developments. Sensitivity is highest outside of established settlements and existing road network.	Developments or use of an inappropriate scale or intensity – even of a small scale – can have disproportionately extensive effects.	None required if use and development conform with existing regulatory requirements and FI Guidelines
B	Sligo Coastal Plain Coastal farming, Mixed sandy and rocky coasts, mountains, bogs – this zone is characterised by many types of different habitats and species in very close proximity	Generally robust with locally high sensitivity – often with transitions between significantly different habitats over very short distances.	Developments within working landscapes and established settlements will have little discernible effect – care required in the vicinity of individual sites.	None required if use and development conform with existing regulatory requirements and FI Guidelines
C	Mayo/Galway Peninsular Mountains, bogs, rocky coasts and scattered farming with scattered settlements. Contains extensive areas of designated habitats, species and features.	Generally high sensitivity both to new development and activities associated with maintenance and renewal of existing developments. Sensitivity is highest outside of established settlements and existing road network.	Developments or use of an inappropriate scale or intensity – even of a small scale – can have disproportionately extensive effects.	None required if use and development conform with existing regulatory requirements and FI Guidelines
D	Clare / North Kerry Coastal Plain Coastal farming, Mixed sandy and rocky coasts, mountains, bogs – this zone contains large-scale areas of designated habitats, species and features	Generally robust with locally high sensitivity in the unique Burren landscapes and nearby large-scale coastal sea-cliff complexes.	Developments within working landscapes and established settlements will have little discernible effect – care required in the vicinity of individual sites.	None required if use and development conform with existing regulatory requirements and FI Guidelines
E	South Kerry/ West Cork Peninsular Mountains, bogs, rocky coasts and scattered farming with scattered settlements. Contains extensive areas of designated habitats, species and features.	Generally high sensitivity both to new development and activities associated with maintenance and renewal of existing developments. Sensitivity is highest outside of established settlements and existing road network.	Developments or use of an inappropriate scale or intensity – even of a small scale – can have disproportionately extensive effects.	None required if use and development conform with existing regulatory requirements and FI Guidelines

9. Existing Environmental Problems

Key points:

- Existing problems are helpful for identifying issues that the plan should focus on.
- They must include any problems related to the integrity of Special Protection Areas and Special Areas of Conservation.

Annex I (d) of the SEA Directive requires a description of 'existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC'. Areas designated pursuant to Directive 79/409/EEC are Special Protection Areas (SPAs) for birds. Areas designated subject to Directive 92/43/EEC are Special Areas of Conservation (SACs) for habitats and species.

Existing environmental problems can be identified from the policy analysis (Section 6) and baseline environmental description (Sections 7 and 8). Are any standards being exceeded? Are targets not being met? Are trends going in the wrong direction? Examples of potential existing environmental problems that should be taken into account include:

- European sites (SPAs and SACs) where tourism-related activities or developments are identified by the National Parks and Wildlife Service as a threat or pressure on the relevant sites;
- areas where capacities in infrastructure – transport or water services, for example – are exceeded on an ongoing basis or at particular times of the year;
- areas where water quality does not achieve European Water Framework Directive standards;
- areas where air quality does not meet European air quality standards;
- protected habitats and species whose status is inadequate or bad.

A good starting point for this section is to consider the environmental monitoring results from the previous iteration of the plan, if one exists, as recommended by the EPA (2020b) 'Guidance on SEA statements and monitoring'. That will give an indication of the effectiveness of previous mitigation measures and whether environmental problems are increasing or abating. Monitoring is dealt with at Section 14 of this guidance note.

Once the existing environmental problems are identified, it would be worth considering why they arose and what is contributing to them. This can help to inform the plan, so that it can help to reduce the causes of the problems. The SEA should seek to ensure that the tourism plan does not make any existing problem worse and it should examine whether the plan could contribute towards the improvement of any existing problem.

Where infrastructural or assimilative capacity in particular locations is being exceeded at particular times, for example, an examination of factors such as demand from local populations and normal local/regional visitors, demand from additional tourism, environmental/seasonal conditions (such as heavy rainfall, drought, low flow periods) or temporary loss of capacity due to improvement/maintenance works could allow for an identification of how much of the pressure is due to additional tourism. Where pressures are identified on ecological resources, monitoring and surveys at particular locations could allow for an identification of which proportion of the pressure is due to normal local/regional recreational and amenity use and which proportion is due to additional tourism.

Table 9.1 suggests how environmental problems might be documented by the SEA. Table 9.2 provides an example of how environmental problems relating to European sites have been identified, while Box 9.1 identifies how environmental problems relating to a plan area have been identified.

Table 9.1 Suggestion: How existing environmental problems might be documented

Problem	Evidence	Cause
Infrastructure project supported by the previous iteration of the tourism plan will increase the future loadings on the existing waste water treatment plant, which is over capacity.	The annual reports from the local waste water treatment plant identify that there are annual exceedances.	Annual exceedances correlate with the tourism peak season, therefore the issues associated with capacity limits are identified as likely to be directly attributable to tourism.
Trail promoted by the previous iteration of the tourism plan has resulted in damage to protected habitats.	Special Area of Conservation database, specifically the site-specific conservation objectives or standard data, identifying trampling as a known threat or pressure for the SAC.	Visitor numbers through the habitat have exceeded the natural resilience of the habitat type and no management interventions have been implemented at the site to address the issue.
Activities promoted within the previous iteration of the tourism plan, such as kayaking, increase accessibility of lake islands, resulting in a potential conflict with breeding birds and/or winter waders.	Survey X in 2021 by organisation Y.	Land-based recreational disturbances are known to cause effects to winter waders. This is particularly relevant with respect to islands, as the species that nest there are likely to be particularly sensitive to disturbance.

Table 9.2 Example: Environmental problems relating to particular European sites (Burren and Cliffs of Moher Visitor Experience Development Plan, amended from Fáilte Ireland, 2020a)

Site code	Site name	Distance (km)	Qualifying features (qualifying Interests and Special Conservation Interests)	Potential effects (refer also to Sections 3.3.2 and 3.3.3 above)	Pathway for significant effects	Potential for in-combination effects
004005	Cliffs of Moher SPA	Within (study area)	Fulmar (<i>Fulmarus glacialis</i>) Kittiwake (<i>Rissa tridactyla</i>) Guillemot (<i>Uria aalge</i>) Razorbill (<i>Alca torda</i>) Puffin (<i>Fratercula arctica</i>) Chough (<i>Pyrrhocorax pyrrhocorax</i>)	The SCIs for the SPA are sensitive to potential effects such as direct disturbance and noise pollution issues. Sources for effects that could impact upon the SCIs include: <ul style="list-style-type: none"> ■ Disturbance of wildlife; ■ Heavy littering or dumping quantities of waste; ■ Addition/alteration of site features, transient emissions, noise; ■ Removal and throwing of large rocks; and ■ Unrestricted dogs causing disturbances to wildlife. 	Yes	Yes
004031	Inner Galway Bay SPA	Within (study area)	Great Northern Diver (<i>Gavia immer</i>) Cormorant (<i>Phalacrocorax carbo</i>) Grey Heron (<i>Ardea cinerea</i>) Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) Wigeon (<i>Anas penelope</i>) Teal (<i>Anas crecca</i>) Shoveler (<i>Anas clypeata</i>) Red-breasted Merganser (<i>Mergus serrator</i>) Ringed Plover (<i>Charadrius hiaticula</i>) Golden Plover (<i>Pluvialis apricaria</i>) Lapwing (<i>Vanellus vanellus</i>) Dunlin (<i>Calidris alpina</i>) Bar-tailed Godwit (<i>Limosa lapponica</i>) Curlew (<i>Numenius arquata</i>) Redshank (<i>Tringa totanus</i>) Turnstone (<i>Arenaria interpres</i>) Black-headed Gull (<i>Chroicocephalus ridibundus</i>) Common Gull (<i>Larus canus</i>) Sandwich Tern (<i>Sterna sandvicensis</i>) Common Tern (<i>Sterna hirundo</i>) Wetland and Waterbirds	The SCIs for the SPA are sensitive to potential effects such as direct disturbance and noise pollution issues. Sources for effects that could impact upon the SCIs include: <ul style="list-style-type: none"> ■ Disturbance of wildlife; ■ Heavy littering or dumping quantities of waste; ■ Addition/alteration of site features, transient emissions, noise; ■ Removal and throwing of large rocks; and ■ Unrestricted dogs causing disturbances to wildlife. 	Yes	Yes

Box 9.1 *Example: Environmental problems relating to a tourism plan area* (Sceilg Mhichil World Heritage Property Management Plan, National Monuments Service, 2021)

The environmental baseline identified a number of environmental problems that have been deemed relevant for Sceilg Mhichíl including:

- Potential for the introduction of invasive non-native species (INNS);
- Current conservation status of Atlantic puffin, Manx shearwater and European storm petrel on Sceilg Mhichíl is unknown;
- Pressure from increasing visitor numbers to Sceilg Mhichíl on the resident seabird population;
- Disturbance of nesting seabird species and damage to their habitat; and
- Increasing frequency and intensity of storm events in the region leading to rockfall incidents.

10. SEA Framework

Key points:

- SEA frameworks are not legally required but can help to structure the impact assessment and mitigation process.
- The framework should be linked to existing thresholds and targets (e.g. European Directives).

While there is no legal requirement for an environmental report to include a formal framework by which to assess the impacts of the plan objectives, alternatives, policies and/or sites, it makes sense to develop such an 'SEA framework', as is described below.

10.1 Strategic environmental objectives, indicators and targets

The SEA framework can comprise:

- a simple list of topics or themes that will be considered during the assessment (e.g. the status of surface waters);
- strategic environmental objectives that state the direction in which the plan should be going. These may be developed from policies that generally govern environmental protection objectives established at international, Community or Member State level (e.g. to contribute towards the maintenance and improvement, where possible, of the quality and status of surface waters);
- indicators that measure the impacts that the plan is likely to have (e.g. classification of Overall Status of Water Bodies, comprising ecological and chemical status, under the European Communities Environmental Objectives (Surface Waters) Regulations 2009);
- targets that the plan should achieve (e.g. no deterioration in the status of any surface water or adverse effect on the ability of any surface water to achieve 'good status' as a result of the plan);
- responses to any problems identified through monitoring (e.g. if the status of waters declines as a result of implementation of the tourism plan, the competent authority will seek to investigate the issue in consultation with the DHLGH Water Section, the EPA Catchment Unit, Irish Water and the relevant planning authority or authorities), as appropriate, and implement a tailored response.

Any/all of these are acceptable as long as they help to identify the plan's impacts and possible mitigation measures.

Table 10.1 shows examples of SEA objectives, targets and indicators for two environmental components. A typical SEA framework might have between eight and 15 SEA objectives, focused on the characteristics of the plan in question. When using SEA objectives as a basis, the assessor asks, for each plan provision, 'will this provision help to achieve the SEA objective?'. Where a plan is likely to have impacts on other countries, this could be added as a separate SEA criterion or information from that country's policy framework could be integrated into relevant strategic environmental objectives, indicators and targets.

Table 10.1 *Example:* Strategic environmental objectives, indicators and targets (Fáilte Ireland, 2021a)

Environmental component	Strategic environmental objectives	Indicators	Targets
Air and climatic factors	AC1: To contribute towards climate adaptation and mitigation	AC1: Demonstration of compliance with provisions relating to climate adaptation and mitigation have been integrated into the Plan	C1: To maximise the amount of measures relating to climate adaptation and mitigation being implemented
Material assets	M1: For development to be served with adequate and appropriate critical infrastructure with sufficient capacity (drinking water, wastewater, waste and transport) that does not present a danger to human health	M1: Number of instances whereby additional tourists are directed by beneficiaries of funding towards areas in the Plan area where adequate and appropriate critical infrastructure with sufficient capacity is unavailable	M1: No instances whereby additional tourists are directed by beneficiaries of funding towards areas in the Plan area where adequate and appropriate critical infrastructure with sufficient capacity that does not present a danger to human health are unavailable
	M2: To contribute towards the protection of public assets and infrastructure, including that relating to recreation and leisure, transport, utilities and marine areas and fisheries	M2: Number of significant adverse effects on the use of or access to public assets and infrastructure	M2: No significant adverse effects on the use of or access to public assets and infrastructure
	M3: To reduce waste volumes, minimise waste to landfill and increase recycling and reuse	M3: Preparation and implementation of construction and environmental management plans	M3: For construction and environmental management plans to be prepared and implemented for relevant projects

10.2 Significance criteria

The SEA frameworks should be accompanied by criteria for determining whether an impact is likely to be significant. Impact significance will depend on factors such as the type and magnitude of impact, duration, probability, sensitivity of the receiving environment, and cumulative impacts, and will ultimately be a matter for expert judgement. An example of a framework of such criteria is shown at Figure 10.1.

Figure 10.1 *Examples: Sets of Significance Criteria*

(Green box below: National Monuments Service, 2021a)

(Blue box below: Fáilte Ireland, 2022d)

The assessment of significant environmental effects was undertaken using a matrix to consider the Plan Objectives and Actions against a set of defined SEA Objectives. Table C-2 – C-12 provide the detailed findings of the assessment. In addition to the text, scoring symbols have been used to denote the effect on the SEA Objectives, the key for which is found in Table C-1 below.

Table C-1 Significance criteria for assessment

Significance of effect	Description of effect significance
Substantially supports SEA objective 	Is considered significant, e.g. beneficial impacts are substantial, substantially accelerate an improving trend, substantially decelerate a declining trend, substantially support delivery of a declared objective.
Support SEA objective 	Supports SEA objective but not to a significant extent, e.g. beneficial impacts are not substantial, do not substantially accelerate an improving trend, do not substantially decelerate a declining trend, do not substantially support from delivery of a declared objective.
Neutral contribution to SEA objective 	Either no impacts or on balance (taking account of positive and negative impacts) a neutral contribution.
Detracts from SEA objective 	Detracts from SEA objective but not to a significant extent, e.g. adverse impacts are not substantial, do not substantially decelerate an improving trend, do not substantially accelerate a declining trend, do not substantially detract from delivery of a declared objective.
Substantially detracts from SEA objective 	Is considered significant, e.g. adverse impacts are substantial, substantially decelerate an improving trend, substantially accelerate a declining trend, substantially detract from delivery of a declared objective.

The relevant aspects of the current state of the environment (see Section 4) and the Strategic Environmental Objectives (SEOs, see Section 5 and Table 7.1) are used in the evaluation of Strategy provisions. This methodology is also used in the assessment of alternatives, the findings of which are provided in Section 7 of this report.

The Strategy provisions (and, in Section 7, the alternatives) are evaluated using compatibility criteria (see Table 7.2 below) in order to determine how they would be likely to affect the status of the existing environment and the SEOs. The SEOs and the Strategy provisions (and, in Section 7, the alternatives) are arrayed against each other in order to demonstrate which interactions would cause effects on specific components of the environment. Where the appraisal identifies an interaction with the status of an SEO the relevant SEO code is entered into the relevant column.

The interactions identified are reflective of likely significant environmental effects:

- Interactions that would be *likely to improve the status* of a particular SEO would be likely to contribute towards a significant positive effect on the environmental component to which the SEO relates, including in-combination with the existing statutory planning/decision-making and consent-granting framework.
- Interactions that would *potentially conflict with the status of an SEO and would be likely to be mitigated* would be likely to result in potential significant negative effects; however, these effects will be mitigated by measures which have been integrated into the Strategy and residual effects would not be significant (see Table 8.3 of this report).
- Interactions that would probably *conflict with the status of an SEO and would be unlikely to be mitigated* would be likely to result in a significant residual negative effect on the environmental component to which the SEO relates.

These effects include secondary, cumulative (see also Section 7.3), synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

The degree to which effects can be fully determined at this level of decision-making is limited, as the Strategy will be implemented alongside planning and project development and associated environmental assessments and administrative consent of projects. More detailed environmental measures may emanate from such assessments, further facilitating the mitigation of adverse effects.

11. Alternatives

Key points:

- The consideration of alternatives is at the heart of the SEA process. Poor consideration of alternatives has led to successful legal challenges.
- The environmental report should present a clear 'storyline' of why, of all the possible ways that the final plan could look, it looks the way that it does.
- The plan-maker can choose any of the alternatives considered as the final preferred alternative(s), even if the SEA shows it to be problematic, but the environmental report must clearly explain the reasons for the choice.

Article 5 of the SEA Directive requires the environmental report to identify, describe and evaluate 'the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme'. Annex I (h) of the Directive requires the report to provide 'an outline of the reasons for selecting the alternatives dealt with'. In practice, this suggests a three-part process:

1. identifying reasonable alternatives;
2. assessing and comparing these alternatives on a consistent basis;
3. explaining the choice of preferred alternatives.

The consideration of alternatives is a key part of the SEA process, as this is where the SEA can provide the most useful information to facilitate the integration of environmental considerations into decision-making and potentially steering the plan towards a more environmentally sensitive and/or sustainable approach. The competent authority can choose any final option, even if the SEA shows it to be problematic, but it must clearly explain the reasons for its choice. It is worth noting that the least favoured option will need particular emphasis on relevant mitigation measures and still needs to comply with any relevant environmental legislation.

11.1 Identifying reasonable alternatives

The identification of 'reasonable alternatives' (also called options or scenarios) is the aspect of SEA that has been subject to the most legal challenges to date.⁹ Further information on SEA-related legal challenges is discussed in the EPA's Developing and Assessing Alternatives in Strategic Environmental Assessment (EPA, 2015) guidance note.

⁹ For example, in Northern Ireland in 2007 in relation to the 'Northern Area Plan' and 'Magherafelt Area Plan' SEAs, and in England in 2009 in relation to the 'East of England plan – The revision to the regional spatial strategy for the East of England' SEA.

Different types of plans will have different potential alternatives. The EPA has published Developing and Assessing Alternatives in Strategic Environmental Assessment (EPA, 2015), which can be a useful reference document when considering alternatives as part of the plan preparation and SEA processes.

It may be helpful to consider a 'hierarchy of alternatives' (e.g. Table 11.1¹⁰), with alternatives higher up the hierarchy typically having more potential to consider more strategic alternatives, such as those relating to need or demand, than those lower down in the hierarchy.

Table 11.1 'Hierarchy of mitigation alternatives' for tourism plans

Types of alternative	Examples
<p>Need or demand:</p> <ul style="list-style-type: none"> ■ Is the plan needed? ■ Should increases/decreases in levels of tourism, tourism development and/or related tourism activities be provided for? 	<ul style="list-style-type: none"> ■ Do not prepare a plan (business as usual) or prepare a plan. ■ Alternatives that provide for different increases and reductions in levels of tourism, tourism development and/or related tourism activities.
	
<p>Mode or process:</p> <ul style="list-style-type: none"> ■ To what extent should a new plan manage tourism, tourism development and/or related tourism activities? ■ Alternatives around tourist spend and bed-nights. ■ Consolidation and improvement versus development of new. 	<ul style="list-style-type: none"> ■ Prepare a plan with additional requirements for environmental protection and management or prepare a plan without additional requirements for environmental protection and management. ■ Alternatives around the amount of money to be spent by tourists. In considering alternatives around spend, the plan could evolve in a way that provides for increases in income from tourists without increasing the number of tourists. ■ Alternatives around the time to be spent by tourists in a destination. In considering alternatives around bed nights per tourist, the plan could evolve in a way that provides for increases in bed nights and income from tourists without increasing the number of tourists travelling to and from a destination. ■ Consolidation and improvement to existing tourism infrastructure, visitor attractions and experiences versus development of major new visitor attractions and experiences – for example, taking account of context-specific considerations based on existing loadings and issues, alternatives might comprise: (a) concentrating loadings to one area; (b) dispersing loadings to satellite areas; (c) creating new areas to ensure existing pressures are not confounded.

¹⁰ Table 11.1 has been prepared for this guidance document taking account of the approach suggested in the EPA's Good Practice Note on SEA for the Energy Sector (2021c).

Types of alternative	Examples
<p>Seasonality, regionality and locations:</p> <ul style="list-style-type: none"> ■ When tourist activity and associated peaks occur will influence the plan's effects. ■ The regional spread of tourism development and activities will influence the plan's effects. ■ Plans can specify locations for new tourism development or new/intensified tourism activities, or provide guidance or criteria for how such locations can be chosen. 	<ul style="list-style-type: none"> ■ Alternatives around the degree to which seasonality is provided for. In considering alternatives around the spread of tourists across various seasons or the clustering of tourists within a peak period, the plan could evolve in a way that provides a greater spread of tourists throughout the year, thereby reducing peak load additions on infrastructure at particular times and other potential environmental effects. ■ Alternatives around the degree to which regionality is provided for. In considering alternatives around the spread of tourists across various locations or the clustering of tourists within particular locations, the plan could evolve in a way that provides a greater spatial spread of tourists throughout the year and/or to less sensitive locations, thereby reducing peak load additions on infrastructure at particular locations and other potential environmental effects. ■ One large or several small projects. ■ Choice of location A, B or C for a particular tourism development or activity and/or supporting infrastructure. ■ Choice of activity X, Y or Z at a particular location.
<p>Timing and implementation:</p> <p>These alternatives can include different timetables (including phasing), and different requirements for implementation such as further studies or mitigation requirements</p>	<ul style="list-style-type: none"> ■ Different phasing. ■ Timetable for implementation of milestones. ■ Criteria for choosing future sites or required mitigation. ■ Requirements for future impact assessments etc.

Public and/or statutory consultee input, by the way of scoping/alternatives workshops, on the identification and assessment of alternatives may identify further alternatives, allow the identified alternatives to be refined, and facilitate an extensive consideration of plan alternatives. Some alternatives – for instance, those suggested by a stakeholder – may not be reasonable because they conflict with national legislation, national guidelines or national policy, are not technically feasible, are exorbitantly expensive, etc. It is good practice to include a brief statement to explain why such alternatives are not taken forward for further assessment.

Boxes 11.1, 11.2 and 11.3 provide examples of different alternatives that have been identified as part of SEA/tourism plan-preparation processes.

Box 11.1 *Example: Visitor number and other alternatives* (Inis Cealtra Visitor Management and Sustainable Tourism Plan, Clare County Council, 2017a)

Low, Medium and High Visitor Number Alternatives ('Need or demand' on Table 11.1's hierarchy)

Period	Low	Medium	High
Year 1	15,000	21,000 (23,500)	33,000
Year 2-3	27,000	33,000 (35,500)	45,000
Year 4-5	39,000	45,000 (47,500)	69,000

Other alternatives considered as part of this SEA included those under the headings of:

- The requirement for a visitor centre or not
- Potential locations for a visitor centre
- Content of visitor centre
- Traffic and transport
- Access to the island
- Crossing to and from the island
- Departure location
- Arrival/Landing locations
- Landing type – pier options
- Ferry operator
- Unscheduled landing
- Protection of built heritage
- Protecting ecology
- Managing meadows
- On-island facilities
- Paths and routes
- Public furniture
- Guide/Emergency room
- Toilet facilities
- Waste management
- Displaying small finds
- Electricity and phone
- Storm shelter
- Signage
- Guiding/Tours
- Community drop-in
- Camping/Picnics etc
- Funerals (historic family plots)
- Graves
- Marketing and promotion times and seasons
- Identity, branding etc.
- Illumination
- Implementation

Box 11.2 *Example: Alternatives relating to ‘need or demand’ and ‘mode or process’¹¹ for a plan*
(Three Peninsulas West Cork and Kerry Visitor Experience Development Plan, Fáilte Ireland, 2021b)

Alternatives 1 and 2 relate to ‘Need or demand’ on Table 11.1’s hierarchy

Alternative 1 (Business as Usual)

Strengths in the arts, a strong food culture and a rich cultural heritage are experienced by tourists to the Three Peninsulas. There are a number of existing challenges to the tourism product (and associated value of tourism to the local economy) in the Three Peninsulas area including:

- Increase in visitor numbers with potential to disturb or damage the natural environment;
- High level of seasonality;
- Visitors are primarily day trippers;
- Few experiences designed to promote overnight stays;
- New accommodation options required to better service the more rural areas and long-distance trails;
- Preservation of key heritage sites such as Dunboy Castle;
- Lack of cohesive approach; and
- Lack of resources to coordinate and develop experiences and events.

This current situation presents Alternative 1 (Business as Usual). Numbers of visitors (and associated day-trip journeys) would be likely to continue to increase under this scenario – consistent with the development of tourism over many decades.

Alternatives 2A and 2B: Prepare a Plan

The challenges posed by the current situation establish a potential need for a plan that seeks to strengthen the value of tourism to the local economy and better manage tourism in the area that relates to the Plan; facilitating, promoting, supporting and coordinating stakeholders (including local authorities, other government agencies, tourism operators, communities and visitors) in their activities in a way that is consistent with existing and emerging plans that have been subject to environmental assessment. Such a plan would not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent (such frameworks fall under the remit of other public authorities). Any projects would continue to be required to comply, as relevant, with the various provisions of documents that form the statutory decision-making and consent-granting framework.

Features of such a Plan (in combination with the wider and extensive policy and planning framework) would include:

- Position the peninsulas as a ‘must do’ destination and motivate visitors to stay overnight and spend more;
- Extend the length of the season;
- Improve the overall economy of communities through strengthening individual businesses, creating new entrepreneurial opportunities sustaining and increasing job creation and increasing the attractiveness of the area for other forms of economic growth;
- Align to the Wild Atlantic Way brand and target markets;
- Support community values and aspirations, and strengthen community appreciation of local culture and intangible heritage;
- Support sense of place enhancement; and
- Promote collaboration and partnership, support engagement of businesses, and build lasting links between national and regional partners, local agencies and associations, and local tourism experiences.

11 Refer to Table 11.1.

Alternatives 2A and 2B relate to 'Mode or Process' on Table 11.1's hierarchy

Under Alternative 2, there are two separate alternatives:

Alternative 2A: A Plan with Additional Requirements for Environmental Protection and Management

Fáilte Ireland provides funding sustainable tourism projects including land use and infrastructural development and land use activities. In order to achieve funding (including promotion) for land use or infrastructural development or land use activities from Fáilte Ireland, **Alternative 2A** would require Fáilte Ireland's stakeholders to demonstrate compliance with measures relating to sustainable development, environmental protection and environmental management contained within the following Fáilte Ireland published documents:

- Wild Atlantic Way Operational Programme Appendix 5 'Site Maintenance Guidelines' and other relevant measures from the Fáilte Ireland visitor and habitat management guidelines series (and any subsequent replacements); and
- Wild Atlantic Way Operational Programme Appendix 6 'Environmental Management for Local Authorities and Others' (and any subsequent replacements).

In order to be realised, projects included in the Plan (in a similar way to other projects from any other sector) would have to demonstrate compliance, as relevant, with various provisions of legislation, policies, plans and programmes that form the statutory decision-making and consent-granting framework, of which the Plan is not part and does not contribute towards.

Further environmental requirements would be integrated into the Plan under Alternative 2A, relating to infrastructure capacity, visitor management and green infrastructure and ecosystem services.

Alternative 2B: A Plan without Additional Requirements for Environmental Protection and Management

Alternative 2B would not include the requirements for environmental protection and management described under Alternative 2A. Projects would continue to be required to comply, as relevant, with the various provisions of documents that form the statutory decision-making and consent-granting framework.

Box 11.3 *Example: Alternatives relating to ‘mode or process’¹² for a plan with spatial elements*
(Lough Derg Destination Development Plan, Tipperary County Council, 2020b)

Alternative 1: Consolidation and improvement to existing tourism infrastructure, visitor attractions and experiences and to provide new attractions in existing settlements

Traditionally Lough Derg has been a popular destination for both overseas and domestic visitors and the height of its popularity coincided with popularity in angling and emergence of the all island boat hire industry which acted as the cornerstone of Ireland’s tourism product in the 1990s. The area and the popularity of this product in particular has since declined, leaving behind a variety of underused hotels, jetties, harbours and boats. A key issue of the VEDP is the need to address the fall off in visitor number and regenerate the visitor infrastructure, services and towns that depend on the tourism industry as a basis for their economy.

Alternative 2: Develop major new visitor attractions on or alongside the water/river

Lough Derg is located within a predominantly rural area which means that visitor infrastructure in terms of attractions, accommodation and associated activity is also low. Generally, speaking, the study area lacks any attractions of scale. The development of new attractions of scale will be required to invigorate the visitor offer and experience. Several locations for new attractions were identified and considered during the preparation of the VEDP; however, these would require the development of green field sites.

Alternative 3: Do nothing

The do nothing scenario was considered prior to the commissioning of the VEDP. With the emergence of Ireland’s Hidden Heartlands brand, a requirement for a planned and coordinated approach was established. Without a masterplan in place, a number of potential disbenefits and environmental impacts would accrue.

11.2 Assessing and comparing the alternatives

The reasonable alternatives are then assessed and compared using the SEA framework developed in Section 10. The alternatives are assessed to the same level of detail and against the same set of criteria. Where relevant, site alternatives can be mapped onto constraints or sensitivity maps. Weighted multi-criteria analysis can be utilised to help identify preferred alternatives, particularly locational options.

Tables 11.2 and 11.3 and Box 11.4 show examples of such comparisons. The assessment process is discussed further at Section 12.

12 Refer to Table 11.1.

Table 11.2 Example: Part of the assessment of alternatives (Inis Cealtra Visitor Management and Sustainable Tourism Plan, Clare County Council, 2017a)

Note that this is only an excerpt of the assessment table from the environmental report. The Strategic Environmental Objectives (SEOs; indicated through codes, e.g. B1, B2, B3) are assessed against compatibility/significance criteria, explained below. More information on such SEOs and criteria are provided in Section 10 of this guidance note, 'SEA Framework'.

No likely interaction with/insignificant impact with SEOs 0 Potential conflict with SEOs – likely to be mitigated ⇅
 Likely to improve status of SEOs ↑ Uncertain interactions with SEOs ? Probable conflict with SEOs – unlikely to be mitigated ↓

Alternative	0	↑	↓	⇅	?	Comment
Cable Car	CH3 S1 WS1, WS2 WW1,		CH1, CH2 L1, L2 B2 P3	L3 B1,B3- B5,B6 S2,S3 W1-7 P1-2 T1,	CC1	Depending on which crossing point was selected, this option is identified as giving rise to a number of environmental effects, whilst several could be mitigated; significant and long term negative impacts are identified for cultural heritage, landscape and population.
Causeway	CH3 S1 WS1, WS2 WW1,		L1 to L3 CH1 P3 B1 to B6 W1, W2,W 6,CC1	All other SEOS		This option represents a substantial physical intervention to provide access and would generate a range of short to long term impacts particularly for water, biodiversity, population, landscape and cultural heritage.
Boats	S1,S2, S3 WA1, WS1, WS2 WW1	Ch1, Ch2 P3 L1, L2, L3 T1 P1, P2 CC1		Bio 1 to 6 S4 W1 to W7		This option represents the continued transport means to the island and is consistent with the historical access route to this island; it requires the most minimal physical intervention of the three options.

Table 11.3 *Example: Part of the assessment of alternatives* (Three Peninsulas West Cork and Kerry Visitor Experience Development Plan, Fáilte Ireland, 2021b)

Note that this table is accompanied by more detailed text in the environmental report. The SEOs (indicated through codes, e.g. B1, B2, B3) are assessed against compatibility/significance criteria, explained across the first two rows in the table. More information on such SEOs and criteria are provided in Section 10 of this guidance note, ‘SEA Framework’.

	Likely to Improve status of SEOs			Potential Conflict with status of SEOs - likely to be mitigated by complying with other measures included within the Plan		Probable Conflict with status of SEOs- unlikely to be fully mitigated
	to the Greatest degree	to a Moderate degree	to a Lesser degree	to a Moderate degree	to a Greater degree	
Alternative 1: Business as Usual			B1 B2 B3 PHH1 S1 W1 W2 W3 AC1 M1 M2 M3 CH1 CH2 L1 Sustainable development, environmental management and environmental protection is provided through the existing statutory planning and consent framework. These measures would contribute towards positive effects on the protection and management of all environmental components (see Table 7.3).		B1 B2 B3 PHH1 S1 W1 W2 W3 AC1 M1 M2 M3 CH1 CH2 L1 Tourism related development would continue to be planned for and consented through the existing statutory planning and consent framework. Potential adverse effects (see Table 7.3) would continue to be mitigated through that process. B1 B2 B3 PHH1 S1 W1 W2 W3 AC1 M1 M2 M3 CH1 CH2 L1 In the absence of a Plan, there would likely to be a continuing increase in tourist numbers – consistent with the development of tourism over many decades. The most popular locations in the Clew Bay area would be likely to see the largest increases in visitors, which would be likely to occur during the peak season. This would be likely to give rise to greater concentration of tourists during peak seasons and in the most popular locations thereby increasing potential environmental effects on all components and peak load additions on various infrastructure in particular locations/at particular times.	
Alternative 2A: A Plan with Additional Requirements for Environmental Protection and Management	B1 B2 B3 PHH1 S1 W1 W2 W3 AC1 M1 M2 M3 CH1 CH2 L1 In addition to the measures relating to sustainable development, environmental protection, environmental management (and associated effects - see Table 7.3) and measures relating to seasonality, regionality and visitor management strategies , provided for by this alternative and Alternative 2B, this Alternative (2A) would provide additional requirements for environmental protection and management.			B1 B2 B3 PHH1 S1 W1 W2 W3 AC1 M1 M2 M3 CH1 CH2 L1 Tourism related development would continue to be planned for and consented through the existing statutory planning and consent framework. Potential adverse effects (see Table 7.3) would continue to be mitigated through that process. B1 B2 B3 PHH1 S1 W1 W2 W3 AC1 M1 M2 M3 CH1 CH2 L1 Although a Plan would help to improve the seasonal and geographic spread of visitors, a Plan’s objective would be to increase the number of visitors in the Clew Bay area. Although this would be likely to happen without a Plan, a Plan would have the potential to increase numbers of tourists – and associated potential adverse effects – to a greater degree. A Plan would also help to promote new experiences – including those relating to land use activities and developments. These would also have the potential to increase adverse effects. Notwithstanding these issues, there would be three layers of mitigation, through: <ul style="list-style-type: none"> • The existing statutory planning and consent framework; • Visitor management strategies; and • Additional environmental requirements for environmental protection and management, under this alternative. 		

Good practice guidance on Strategic Environmental Assessment (SEA) for the Tourism Sector

	Likely to Improve status of SEOs			Potential Conflict with status of SEOs - likely to be mitigated by complying with other measures included within the Plan		Probable Conflict with status of SEOs- unlikely to be fully mitigated
	to the Greatest degree	to a Moderate degree	to a Lesser degree	to a Moderate degree	to a Greater degree	
Alternative 2B: A Plan without Additional Requirements for Environmental Protection and Management		<p>B1 B2 B3 PHH1 S1 W1 W2 W3 AC1 M1 M2 M3 CH1 CH2 L1</p> <p>In addition to the measures relating to sustainable development, environmental management and environmental protection (and associated effects - see Table 7.3), this alternative would provide measures relating to seasonality and regionality – such measures would also be provided for by Alternative 2A.</p>			<p>B1 B2 B3 PHH1 S1 W1 W2 W3 AC1 M1 M2 M3 CH1 CH2 L1</p> <p>Tourism related development would continue to be planned for and consented through the existing statutory planning and consent framework. Potential adverse effects (see Table 7.3) would continue to be mitigated through that process.</p> <p>B1 B2 B3 PHH1 S1 W1 W2 W3 AC1 M1 M2 M3 CH1 CH2 L1</p> <p>Although a Plan would help to improve the seasonal and geographic spread of visitors, a Plan’s objective would be to increase the number of visitors to the Clew Bay area. Although this would be likely to happen without a Plan, a Plan would have the potential to increase numbers of tourists – and associated potential adverse effects – to a greater degree.</p> <p>A Plan would also help to promote new experiences – including those relating to land use activities and developments. These would also have the potential to increase adverse effects.</p> <p>Notwithstanding this, there would be two layers of mitigation, through:</p> <ul style="list-style-type: none"> • The existing statutory planning and consent framework; and • Visitor management strategies. 	

Box 11.4 *Example:* Part of the assessment of alternatives (Lough Derg Destination Development Plan, Tipperary County Council, 2020b)

Note that this table is accompanied by more detailed consideration against Strategic Environmental Objectives in the environmental report.

Alternative 1: Consolidation and improvement to existing tourism infrastructure, visitor attractions and experiences and to provide new attractions in existing settlements

The central environmental benefit of this alternative is associated with its focus on the re-use and regeneration of existing tourism facilities and infrastructure and the regeneration of town centres. Whilst in some cases increased visitor numbers will mean that upgrades to existing infrastructure may be required it is generally considered that the environmental impacts on air, water will be captured using these specific infrastructure upgrades and therefore minimised in this scenario. Indeed, the socio-economic benefits are likely to be greatest under alternative 1 as the economic benefits will accrue in areas where the existing population is highest.

Alternative 2: Develop major new visitor attractions on or alongside the water/river

The environmental impacts associated with developing wholly new visitor attractions within the VEDP area are dependent on the nature, scale and location of the development and are potentially wide ranging.

Alternative 3: Do nothing

The do nothing and business as usual approach was not considered appropriate on the basis that it would result in poor value for money in terms of any future investment as well as a potentially greater scale of environmental impacts associated with significant levels of unplanned and uncoordinated development. Without a plan led approach, the opportunity to test and consult on the strategy in accordance with the requirements of the Strategic Environmental Assessment Directive would also be missed.

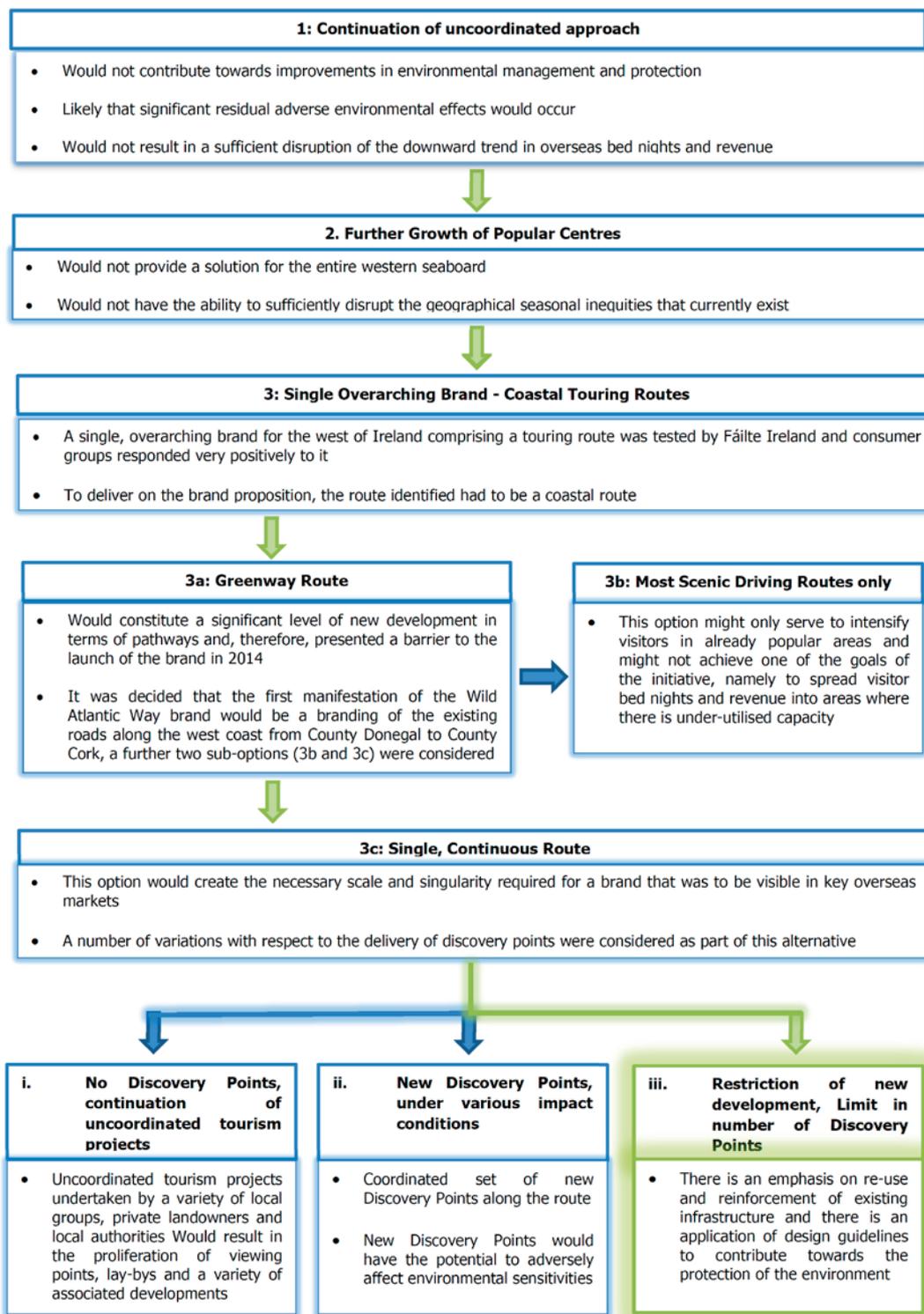
11.3 Explaining the choice of preferred alternatives

The preferred alternative(s) should be viable legally, technically, financially, environmentally and socially and should be resilient and able to cope with a range of scenarios and shocks. A key role of the SEA is to 'tell the story' of how the plan developed: to explain how environmental factors were taken into account in the decision-making process, including the selection of preferred alternatives. Reasons should be given for the rejection of alternatives that are not preferred and/or for the choice of the preferred alternative(s).

Figure 11.1 provides an example of telling the story of how a particular alternative was selected for a tourism plan.

Figure 11.1 Example: Decision tree showing process of choosing selected alternative
(Wild Atlantic Way Operational Programme, Fáilte Ireland, 2015)

As the National Tourism Development Authority, Fáilte Ireland needed to respond to the significant decline in international bednights and revenue in the west of Ireland that had occurred between 2007 and 2010 with a marketing initiative that would help to arrest and eventually begin to reverse this decline. A wide range of options were open to the Authority (Option 1, 2 and Option 3; Option 3a, 3b and 3c; and Option 3ci, 3cii and 3ciii) and all were considered, as indicated on the decision tree for the selected alternative below.)



12. Likely Significant Environmental Effects

Key points:

- This impact prediction stage should be inextricably linked with the next, mitigation, stage: mitigation should be considered for any significant negative impacts identified.
- The level of detail of the analysis should be proportional to the level of detail of the plan and the significance of the effects.
- The impact assessment should consider not only direct, short-term impacts but also secondary, cumulative, etc. impacts.

This is the stage where the impacts of a draft plan and its alternatives are identified.

12.1 Range and type of effects

The SEA Directive does not require any particular form of analysis, but it does require that a particular range of effects be considered. Annex I (f) of the SEA Directive requires that the environmental report should describe 'the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, landscape and their interrelationship ... These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.' In practice, assessments are normally made using the SEA framework from Section 10.

Section 3.3 of this document provides guidance on 'Tourism attribution and scoping in and out' and should be referred to when considering which effects should be considered in the SEA.

Types of tourism effects can arise from the developments and/or activities, including those relating to:

- mobility, such as effects relating to:
 - emissions – including noise and greenhouse gas emissions;
 - energy;
 - transport infrastructure/traffic management;
- accommodation and hospitality, such as effects relating to:
 - land-take;
 - water services infrastructure¹³ – there is significant seasonality in capacity (assimilative and flow) and demand;

¹³ There is a need for close collaboration with the relevant stakeholders, such as local authorities and Irish Water, to ensure that any proposals within the tourism plan align with the capacity of the supporting critical service infrastructure.

- emissions – which may interact with the status of waters and aquatic life; also including noise and greenhouse gas emissions;
- energy;
- displacement;
- other tourism-related products (developments and activities), such as effects relating to:
 - ecology;
 - heritage;
 - water services infrastructure¹⁴ – there is significant seasonality in capacity (assimilative and flow) and demand;
 - landscape;
 - land-take;
 - emissions – which may interact with the status of waters and aquatic life; also including noise and greenhouse gas emissions;
 - energy;
 - displacement.

More detail on frequently identified potential significant environmental effects is provided under a number of headings below.

Transportation, water services and land development

The main impacts from tourism arise from effects on transportation, water services and land development. Tourism is already provided for by various statutory documents setting out public policy for, among other things, land use development and activities, infrastructure, sustainable development, environmental protection and environmental management. These policy documents provide the accommodation, movement and hospitality facilities that are the fundamentals on which the tourism sector is based. All these documents will have been subject to their own environmental assessment processes, as relevant, and form the decision-making and consent-granting framework. Tourism plans, which are the subject of SEAs that this note provides guidance on, are likely to facilitate, promote, support and coordinate stakeholders in their activities in a way that is consistent with these documents that have been subject to SEA and other assessments. Supporting infrastructure and services and other specific projects (such as signage programmes, visitor centres or car parks) that are already provided for by the existing planning framework and that have already been subject to environmental assessment should provide a focus in the SEA for consideration of cumulative, in-combination effects.

¹⁴ There is a need for close collaboration with the relevant stakeholders, such as local authorities and Uisce Éireann, to ensure that any proposals within the tourism plan align with the capacity of the supporting critical service infrastructure.

Ecology

By international standards, Ireland has a high level of tourism management, planning and research with effects that are well understood, especially when it comes to ecology (see case study at Box 14.1 of this guidance note, for example). There is significant evidence from Fáilte Ireland's environmental surveying and monitoring of the Wild Atlantic Way Operational Programme that international tourists in rural locations give rise to very low levels of impacts. Most Irish tourism is now urban and structured. Covid evidence has confirmed that most high-visibility/high-impact visitor effects arise from local recreational use. Most of the impacts from tourism are indistinguishable from the recreational, occupational and betterment effects generated by local and national populations.

Potential effects on ecology, if these effects are not mitigated (Section 13 of this guidance note covers mitigation), are:

- destruction of structures, vegetation or fauna;
- trampling of herbaceous vegetation;
- disturbance of wildlife;
- heavy littering or dumping of quantities of waste;
- addition/alteration of site features, transient emissions, noise;
- harvesting of large quantities of shells from beach sites;
- fishing activities;
- removal of large rocks;
- unrestricted dogs causing disturbances to wildlife.

Effects arising from greenways, blueways, etc.

The development of new and existing greenways, blueways, peatways, trails and walking and cycling routes, including those within and between existing destinations, has the potential to contribute to sustainable mobility and a better management of movements in sensitive areas, thereby benefiting various environmental components including habitats at certain locations.

The development of these projects, however, presents a variety of potentially adverse environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. These types of infrastructure are often located in ecologically and visually sensitive areas adjacent to the banks of rivers and streams or along the coast. Potential adverse effects can be mitigated using established techniques, such as minimising the crossing of water bodies and setting infrastructure a suitable distance away, e.g. a field's width from the bank of the waterbody. Such projects are likely to be subject to normal planning and environmental assessment processes.

Creating new routes can introduce invasive alien species. These routes also need to be sensitively designed and maintained to protect habitats and species along the routes (considering, for example, lighting, drainage and maintenance practices for weed control). Efforts should be made to control and monitor invasive species and provide where appropriate the relevant biosecurity-related awareness and measures as necessary.

Parking/disembarking facilities need to be sensitively designed also to cater for numbers while reducing adverse impacts such as congestion, noise and littering.

The development of green infrastructure can achieve synergies with regard to the provision of open space amenities, sustainable mobility, the sustainable management of water, the protection and management of biodiversity, the protection of cultural heritage and the protection of designated landscape sensitivities.

Visitor management

Most tourism and recreational issues arise from management, not development, and management is generally not subject to planning, permitting or licensing. Tourism plans offer an opportunity to provide for mitigation measures relating to management, and a number of examples of this are provided at Section 13, 'Mitigation Measures', of this guidance note.

Greenhouse gas emissions and the Climate Action Plan

Tourists contribute to greenhouse gas emissions across the same sources/sectors as local and national populations, e.g. transport, heating and electricity, agriculture/food production and waste generation. Measures within tourism plans that encourage low-carbon travel, such as walking and cycling, low-carbon activities and the circular economy, can help to minimise any increases in and reduce emissions.

The Government's National Climate Action Plan 2023 provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting us on a path to reach net-zero emissions by no later than 2050. The Action Plan lists the actions needed to deliver on climate targets and sets indicative ranges of emissions reductions for each sector of the economy. It will be updated annually, to ensure alignment with legally binding economy-wide carbon budgets and sectoral ceilings. The Action Plan supports the further development of sustainable tourism and sustainable destination management and provides for various measures that will contribute to climate mitigation, such as those relating to sustainable mobility, carbon pricing, electricity, agriculture and the built environment.

With regard to Non-Road Transport Activities, the Action Plan recognises that action is being taken at EU and international levels to address emissions from the aviation and maritime sectors, including through market-based measures such as the Emissions Trading Scheme and sustainable fuel mandating initiatives (through ReFuel EU Aviation, Fuel EU Maritime and the Alternative Fuel Infrastructure Regulation, which will all include binding targets once adopted). The Action Plan commits to supporting such measures.

12.2 Level of detail

The level of detail and the level of analysis should be proportional to the level of detail of the plan and the environmental sensitivity within the plan area. Where the plan is site-specific, appropriate levels of site-specific assessment should be carried out.

The higher the level of the plan in the tourism hierarchy, e.g. a national or a regional plan, the more strategic and less detailed the plan provisions and the environmental assessment (including, for example, baseline description, alternatives considerations and mitigation and monitoring measures) are likely to be. The lower the level of the tourism plan, e.g. a town or a destination plan, the more detailed the plan provisions are likely to be and the environmental assessment should be.

The baseline environmental description should already include information about characteristics of area(s) that are likely to be significantly affected (see Section 8 of this guidance note). This will provide the basis for the environmental assessment. Information on the level of detail proposed (and sensitivity of the area) could also be provided at the scoping stage of the process.

Figure 12.1 summarises a regional assessment taking account of accommodation, tourism facilities and associated water and waste infrastructure, which uses the baseline information that was included earlier in the environmental report.

Figure 12.2 provides an example of a site-specific assessment.

Figure 12.1 *Example:* Regional assessment (Wild Atlantic Way Operation Programme, Fáilte Ireland, 2015)

This section attempts to provide a holistic evaluation of the overall potential for regional environmental effects.

It has been observed that the evaluation of potential effects relies on existing Strategic Environmental Assessment of Regional, City, Town and Local Area Plans and that these principally address either zoned lands or high-level developmental policy. It is also challenging to adequately assess effects from activities which are highly mobile, which straddle many administrative boundaries – such as tourism – and which take place in both urban and rural areas.

All of these factors give rise to the potential to overlook a consideration of the entire environment which accommodates other unregulated activities – such as agriculture, unstructured and passive recreation, transportation as well as tourism.

To address this issue this section attempts to provide an overview of the environments that contain the Wild Atlantic Way – and its associated effects. The purpose is to identify if there are any general environmental characteristics that are evident and can be more effectively assessed at a regional scale.

Previous sections provided mapped regional summary of the three environmental resources that are most likely to be affected by the Wild Atlantic Way – Cultural Heritage, Natural Heritage and Landscape – in order to establish whether any regional pattern of common characteristics could be determined.

These are combined – see Figure 8.1 – to identify boundaries between five areas of broadly shared characteristics. These areas are examined in turn to determine whether there is existing broad regional capacity to ensure that likely effects can be managed and absorbed.

This mapping indicates that each generalised region is served at the boundary and internally by at least one major gateway town. These all have regionally significant existing capacity in terms of accommodation, tourism facilities and associated water and waste infrastructure. All of these gateways also have transportation capacity of regional and national scaled capacity – including six airports, and 7 intercity rail terminals.

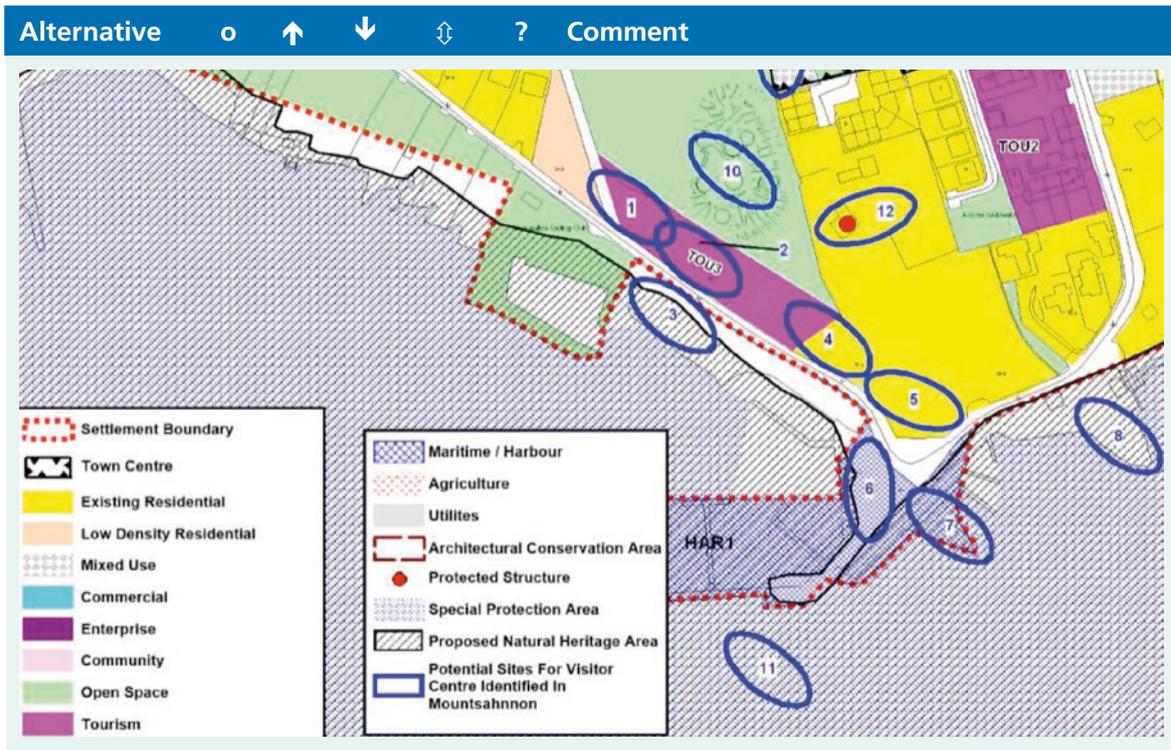


Figure 8.1 Assessment of Regional Assimilative Capacity

Figure 12.2 *Example: Site-specific assessment* (Inis Cealtra Visitor Management and Sustainable Tourism Plan, Clare County Council, 2017a)

Below is part of a site-specific assessment provided for potential locations for a proposed visitor centre. Potential sites were identified, as can be seen on the map. The tabulated assessment for four of these sites is provided beneath the map – refer to the environmental report for full assessment. Strategic Environmental Objectives (SEOs) (indicated through codes, e.g. L1, P1, P3) are assessed against compatibility/significance criteria, explained below. More information on such SEOs and criteria are provided in Section 9 of this guidance note.

- No likely interaction with/insignificant impact with SEOs 0
- Potential conflict with SEOs – likely to be mitigated ⇅
- Likely to improve status of SEOs ↑
- Uncertain interactions with SEOs ?
- Probable conflict with SEOs – unlikely to be mitigated ↓

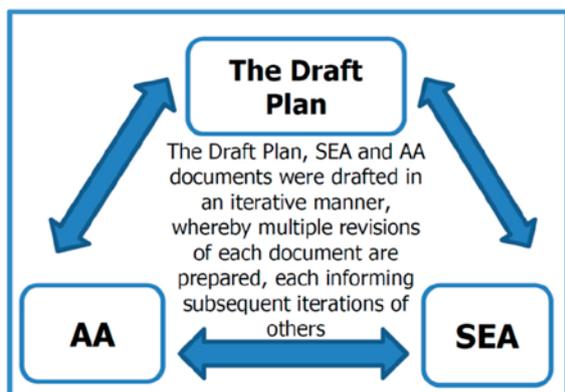


Alternative	o	↑	↓	↕	?	Comment
1. North west stretch of southern boundary (lower road) of Aistear Park		L1 P1 P3 T1 Ch1		All other SEOs		<p>Site 1 is located at the southern boundary of the existing Aistear Park. It can provide for a view to the island which is a key design consideration for the visitor centre; this option also allows for a direct access to embarkation to the island. This site can accommodate a visitor centre within its footprint.</p> <p>Positive effects on SEOs include population and human health, landscape and a number of material assets most notably transport as it can facilitate access from the main street and onto the embarkation point. This location would allow pedestrian movement from the main street through the park and onto access to this island, which also generates positive effects for population and human health. Its location allows for a circulation of pedestrians and, if necessary, coaches around the village. There is also existing footpath provision along the Aistear Park, main street and down to the harbour so would not require additional footpaths in this scenario. Some removal and/or thinning of trees may be required in this scenario although it would depend on the final detailed design and a key aim should be to minimise removal of mature trees where possible.</p> <p>In this instance, existing mitigation measures developed for the plan as well as objectives of the Clare CDP 2017–2023 would apply. This location is also zoned as ‘TOU’ – Tourism under the Clare CDP 2017–2023, and a visitor centre would be consistent with this land use zoning. This site is located within Flood Zone C and a flood risk assessment undertaken for this site has also found that it is consistent with the flood risk assessment guidelines (2009).</p>
2. Middle of southern boundary (lower road) of Aistear Park		L1 P1 P3 T1 Ch1		All other SEOs		<p>Site 2 is located adjacent to Site 1, slightly further to the east and closer to the harbour. Impacts are similar to those outlined for Site 1, i.e. positive effects on Population and Human Health and Transport SEOs in particular. This option also allows for pedestrian movement, utilisation of existing footpaths, access to the harbour and views to the island.</p> <p>This location is also zoned as ‘TOU’ Tourism under the Clare CDP 2017–2023, and a visitor centre would be consistent with this land use zoning. This site is located within Flood Zone C and a flood risk assessment undertaken for this site has also found that it is consistent with the flood risk assessment guidelines (2009).</p>

Alternative	○	↑	↓	↕	?	Comment
3. Public open space to lake side of lower road (south east of sailing club)			W6	All other SEOs		<p>Site 3 is on the current open space southeast of the sailing club on the lake front. It has the advantage of being on the lake front but this positive is somewhat offset by any visitor centre here having a slightly inferior view to the island. This site is identified as giving rise to adverse effects on a number of SEOs namely landscape, population and human health, biodiversity, transport and flood risk. Its location reduces connectivity between the village and a visitor centre in this site, it would require more physical interventions in terms of safe pedestrian access and transport movement around the site. The key environmental constraint for this location is that the site is located in Flood Zone A as identified in the strategic flood risk assessment and developing a new building on this land is not in compliance with the sequential approach to development as detailed in the Flood Risk Assessment Guidelines (2009).</p> <p>Finally, Site 3 is situated within the proposed Natural Heritage Area (site code 000011) and has no land use zoning in the Clare CDP 2017–2023.</p> <p>For all these reasons the option gives rise to a number of potential adverse effects on SEOs and has been excluded from further consideration.</p>
4. Boundary between Aistear Park and the Rectory (along lower road)		L1 P1 P3 Ch1		All other SEOs		<p>Sites 4 and 5 are both similar to Sites 1 and 2 in that they are located in the same area close to the harbour and present similar positive effects for a number of SEOs, namely landscape, material assets (transport) and population and human health.</p> <p>Site 4 is located in both Tourism and Existing Residential land use zonings so a visitor centre would be partly compatible with this location (under the Tourism zoning).</p> <p>The site is also outside a flood zone A or B.</p> <p>The main environmental constraint associated with Site 4 relates to accessibility from the main street and there may also be constraints about accessing this location via the Aistear Park as such access may not be as easily facilitated to this location. In turn, this may result in the requirement for additional physical interventions such as additional footpaths through the Aistear or a new footpath between the Aistear and adjacent lands to the west. This could give rise to adverse effects on biodiversity, landscape, material assets and population and human health SEOs. This option was therefore excluded.</p>

12.3 Iterative process

Figure 12.3 Example: The iterative process (Fáilte Ireland, 2020b)



Several rounds of impact assessment and mitigation may be needed alongside the preparation of a given tourism plan. The assessment should be communicated to the plan-preparation team on an ongoing basis from the outset in order to enable the full integration of key environmental considerations into the plan. The assessment should ideally be undertaken in an iterative manner whereby multiple revisions of SEA and corresponding emerging plan documents are prepared, each informing subsequent iterations of the other. This iterative process can help to integrate mitigation into the plan and steer the plan towards contributing to sustainable development and environmental protection and management.

The prediction of likely significant environmental effects should be linked with mitigation (see Section 13 of this guidance note); mitigation should be considered for any significant adverse effects identified.

12.4 Carrying out the impact assessment; SEA Framework and source-pathway-receptor

Impact assessments typically use the SEA framework as a structure, and are often presented in the form of tables (e.g. Table 12.1), with the plan components on one axis and the environmental components on the other axis, or maps.

The identification of potential significant environmental effects and associated environmental assessments should be conducted following a standard source-pathway-receptor¹⁵ model, where, in order for an effect to be established all three elements of this mechanism must be in place. The absence or removal of one of the elements of the model is sufficient to conclude that the significant effect is not likely.

A source is any identifiable element of the plan provision that is known to interact with environmental components, for example increased levels of treated or untreated wastewater. Receptors are the environmental features that are sensitive to impacts, for example sensitive aquatic habitats and species. Pathways are any connections or links between the source and the receptor, for example a stream downstream of a discharge and upstream of a sensitive river system.

¹⁵ Source(s) – e.g. increased levels of waste water; Pathway(s) – e.g. stream connecting to nearby river system; and Receptor(s) – sensitive aquatic habitats and species.

There is a degree of uncertainty associated with impact prediction for tourism at this level. This relates to factors such as the strategic nature of the interventions being considered, which can be regional and county level rather than site-specific; elements of independent, self-directed tourism that is not determined by established touring groups or guides, so the specific routes and times of movement may not be readily predictable; and changes in visitor patterns that may occur due to changes in weather, seasons, products and promotion. The promotion of places, activities and products is an integral part of tourism, and tourism promotion and marketing campaigns are one of the primary drivers of tourism numbers. Environmentally responsible promotion and marketing can be used in visitor management techniques that can help to mitigate adverse effects – see Section 13, ‘Mitigation Measures’. Data from surveys and monitoring (see Section 14, ‘Monitoring Measures’) can be used to reduce uncertainties in visitor movements and inform responses in promotion.

Table 12.1 Example: Plan policy assessment using SEA framework (Wild Atlantic Way Operational Programme, Fáilte Ireland, 2015)

	Likely to Improve status of SEOs	Probable Conflict with status of SEOs - unlikely to be mitigated	Potential Conflict with status of SEOs- likely to be mitigated	No Likely interaction with status of SEOs
Objective To use seasonal and site-specific visitor management measures to anticipate and avoid increases in environmental loadings due to changing visitor numbers. To influence Local Authorities to take steps to avoid unwanted traffic congestion in local areas.	B1 B2 B3 PHH1 S1 W1 W2 M1 M2 CH1 CH2 L1 C1			M4 W3 M3
Commentary: <i>Anticipation and avoidance of increases in environmental loadings would benefit the protection and management of various environmental components. The objective is consistent with the other parts of the Programme, allowing for visitor management:</i> <ul style="list-style-type: none"> • <i>At a macro spatial level in terms of what sections of the western seaboard can accommodate increases in visitors;</i> • <i>At a micro spatial level in terms of what areas adjacent to viewing points, lay-bys etc. should be avoided; and</i> • <i>In terms of time; growth can be sought in times outside of the summer peak.</i> 				
Strategy To target areas where there is under-utilised capacity and encourage greater levels of travel during the shoulder season by using sales and marketing initiatives. To work with Local Authorities to ensure that unsustainable environmental loading (such as traffic congestion, water loading or habitat pressure) are identified in advance and action taken to avoid the issue or reduce its impact locally. To ensure that visitor activities are managed to avoid and reduce additional pressures at sensitive sites.	M4 B1 B2 B3 PHH1 S1 W1 W2 M1 M2 CH1 CH2 L1 C1		B1 B2 B3 PHH1 S1 W1 W2 W3 M1 M2 M3 CH1 CH2 L1 C1	
Commentary: <i>Encouraging greater levels of travel, the evaluation provided for this Strategy is generally consistent with that provided for the selected alternative under Section 7 including at Table 7.5. Avoiding or reducing traffic congestion would help to reduce travel related emissions to air. By contributing towards the spread of visitors over the season and focusing on the off-peak months this Strategy would help to minimise potential stresses and avoid increases in infrastructural demand during the summer peak season thereby improving the protection and management of environmental components. The Strategy also provides for the anticipation and avoidance of increases in environmental loadings and site specific visitor management – both of which would benefit the protection and management of environmental components.</i>				

12.5 Cumulative effects

Cumulative effects are the total impacts of the plan, in combination with the environmental effects of other past, current and foreseeable plans, projects and trends.

Cumulative effects can be grouped into:

- Intra-plan cumulative effects – these arise from the interactions between different types of potential environmental effects resulting from a plan, programme, etc. Where there are elevated levels of environmental sensitivities, future development could result in environmental conflicts and lead to a deterioration in environmental integrity. Interrelationships between environmental components help determine these potential effects, e.g. interrelationships between: human health and water quality; human health and air quality; human health and flood risk; and ecology and water quality.
- Inter-plan cumulative effects – these arise when the effects of the implementation of one plan occur in combination with those of other plans, programmes, developments, etc.

Climate change, habitat fragmentation, soil erosion and deterioration of water quality can all be examples of cumulative effects. Whereas the rest of the impact assessment process focuses on the impacts of the plan, cumulative effects consider the impacts on environmental receptors. Overall cumulative effects must stay within environmental limits, otherwise the plan/programme will not be sustainable in the long term.

By the time likely significant environmental effects are being assessed, the SEA scoping process will have been largely completed, although scoping continues throughout the process. This process should have identified which developments and activities can reasonably be assigned to the tourism plan being considered and which are already provided for and assessed by the existing planning hierarchy, including as infrastructure and amenities for the general population (refer also to Section 3.3, 'Tourism attribution and scoping in and out', and Section 6, 'Relationship with Other Relevant Plans and Programmes').

Although the SEA Directive seeks to avoid duplication of assessment,¹⁶ it does require that cumulative effects (when the effects of the implementation of a plan occur in combination with those of other plans, programmes, etc.) are assessed. Supporting infrastructure and services (waste water, drinking water, transport, waste management, amenities, for example) and tourism-specific projects (such as signage programmes, visitor centres, ferry services or car parks) that are already provided for by the existing planning hierarchy and may have been subject to environmental assessment should provide a focus in the SEA for cumulative, in-combination effects.

¹⁶ Article 5 (2) The environmental report prepared pursuant to paragraph 1 shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

Most of the impacts from tourism are indistinguishable from the recreational, occupational and betterment effects generated by local and national populations. Where infrastructural or assimilative capacity in particular locations is being exceeded at particular times, an examination of factors such as demand from local populations and normal local/regional visitors, demand from additional tourism, environmental/seasonal conditions (such as heavy rainfall, drought, low flow periods) or temporary loss of capacity due to improvement/maintenance works could allow for an identification of how much of the pressure is due to additional tourism. Ideally, where environmental pressures are identified, additional targeted monitoring and surveying of these areas may identify which proportion of the pressure is due to normal local/regional recreational and amenity use and which proportion is due to additional tourism.

The EPA (2020a) Good Practice Guidance on Cumulative Effects Assessment in Strategic Environmental Assessment is a useful starting point for considering cumulative effects.

Tables 12.2 and 12.3 and Box 12.1 provide examples of how cumulative effects have been assessed.

Table 12.2 Example: Cumulative effects – biodiversity and flora and fauna (Tourism masterplan for the Shannon Region, Waterways Ireland, 2020a)

Biodiversity Flora and Fauna: Cumulative effects in this regard is often a gradual erosion of open and wild spaces and squeezing of buffer areas particularly along rivers and coasts and deterioration of ecological condition e.g. water or air quality. Cumulative effects will arise from increased human activity leading to increased disturbance of animal and bird species and their habitat.

Plan / Project	Summary of Relevant Policies/ Project	Potential Cumulative effect
Government of Ireland. Outdoor Recreation Plan for Public Lands and Waters in Ireland 2017-2021	Developed by five public landowning organisations as ‘creating step change’ in delivery of outdoor recreation opportunities on public lands and waters, comprising 15% of Ireland’s land surface.	Further recreational development in natural areas
Lough Ree & Environs - UNESCO Biosphere Designation	UNESCO Biosphere Designation for Lough Ree and its environs, will enhance the environmental status and create opportunities for low impact, nature-based tourism experiences.	Enhance habitat management
Beara Briefne Way	Redevelopment of existing walking route	Further recreational development / disturbance in natural areas

Table 12.3 *Example: Cumulative effects – water* (Lough Derg Destination Development Plan, Tipperary County Council, 2020b)

Water: Due to the projected visitor numbers, there may be negative impacts due to additional demand on water supply and wastewater services which are at or are approaching capacity in some areas or have limited or no treatment. Water and wastewater services must be delivered on a phased basis to match projected demand.

The re-development of harbours and waterways could have negative cumulative impacts in terms of the resultant increase in boating, which will increase the number of sources of pollution e.g. emissions to air, wastewater and litter.

Plan / Project	Summary of Relevant Policies/ Project	Potential Cumulative effect
River Basin Management Plan for Ireland 2018-2021	The Plan sets out the actions that Ireland will take to improve water quality and achieve 'good' ecological status in water bodies (rivers, lakes, estuaries and coastal waters) by 2027. An enhanced evidence base has been developed to guide national policies and the targeting of local measures. Technical assessments of 4,829 water bodies have been carried out, examining their status (quality) and whether they are 'at risk' of not meeting status objectives in the future. Using this information, the River Basin Management Plan sets out national policies and regional prioritised measures.	Improved water quality
Irish Water Capital Investment Plan 2017 to 2021	Irish Water's Investment Plan set out the capital projects and programmes that it plans to progress and deliver during the plan period. They include proposed costs and timelines and the outputs and outcomes that will be delivered for the investment. The Investment Plans allow Irish Water to maintain, upgrade and build new treatment plants, sewers, pipes and so on. This allows Irish Water to improve the quality of water and wastewater treatment, to provide better service to homes and businesses, and, to help facilitate social and economic growth. Irish Water's Investment Plans contain a mix of projects, national programmes and capital maintenance programmes including projects deliver new and upgraded assets at specific locations e.g. a new treatment plant.	Improved water quality

Box 12.1 *Example: Cumulative effects* (Three Peninsulas West Cork and Kerry Visitor Experience Development Plan, Fáilte Ireland, 2021b)

Cumulative effects that have been considered include those resulting from the Plan in-combination with the following:

- Land use policy, plans and programmes (e.g. the National Planning Framework, the Regional Spatial and Economic Strategy, Development Plans and Local Area Plans);
- Water services, waste management, transport and energy infrastructure plans (e.g. Irish Water's Water Services Strategic Plan and associated Capital Investment Plan, Regional Waste Management Plans, Transportation Policies and Strategies, Grid25 and associated Implementation Programme) and the Local Economic and Community Plans; and
- Environmental protection and management plans (e.g. River Basin Management Plans, National Climate Action Plan, National Adaptation Framework, and Flood Risk Management Plans).

Potential cumulative effects include the following arising from the alternatives in combination with the plans etc. detailed above (note that potential adverse cumulative effects will be mitigated by provisions that have been integrated into the Plan - see Section 9):

- Contribution towards sustainable development, environmental protection and environmental management – various provisions for which are provided for in the aforementioned plans (**Alternatives 1, 2A and 2B**).
- Need for and use of services, infrastructure and other development (to service development, including tourism), including those related to water services, transport, access or accommodation, that are planned for and consented through the statutory framework – and associated potential adverse environmental effects on various environmental components including biodiversity and flora and fauna, the status of waters, human health, soil, emissions, cultural heritage and landscape (**Alternatives 1, 2A and 2B**).
- Contribution towards climate adaptation and mitigation through measures such as those relating to walking and cycling, charging infrastructure, flood risk management and resilience (**Alternatives 1, 2A and 2B**).
- Contribution towards travel related greenhouse gas and other emissions to air as a result of increases in tourist numbers (**Alternatives 1, 2A and 2B**).
- Helps to minimise likelihood of exceeding capacity in material assets as a result of not directing additional tourists towards specific locations in instances where significant problems with critical infrastructure (drinking water, wastewater, waste and transport) have been identified (**Alternative 2A**). This would positively impact upon the protection and management of environmental components such as human health, water, soil, air and climatic factors.
- Contribution towards the protection and management of biodiversity and flora and fauna (in designated sites, including European Sites and Wildlife Sites, and Annexed habitats and species, listed species, ecological connectivity and non-designated habitats) through visitor management strategies, as relevant and appropriate (**Alternative 2A**).
- In combination with plans and programmes from all sectors potential adverse effects on all environmental components arising from all development in greenfield and brownfield areas (e.g. infrastructural, residential, accommodation, economic, forestry, agricultural etc.). The type of these effects are consistent with those described on Table 7.3. These plans and programmes from other sectors undergo SEA and comply with environmental legislation while projects are subject to EIA and AA, as relevant (**Alternatives 1, 2A and 2B**).

12.6 Secondary and transboundary impacts

Secondary impacts are impacts that are not a direct result of the project, often produced away from the plan area/project site or because of a complex pathway. For example, the development of a tourist experience in the west of Ireland would have the potential to contribute to potentially adverse environmental effects in cities such as Dublin. The experience could attract visitors to Ireland who consist of day-trippers from major cities. This results in the need to provide bed-nights in the cities, contributing to an increased demand for constructed accommodation and associated services – all of which present potentially adverse effects on environmental components such as water, infrastructure and cultural heritage.

Transboundary impacts are those that affect other Member States (see also Section 5.2 'Consultation'). Transboundary impacts could be systematically identified through the SEA framework (see Section 10), or they could be identified at the end of the assessment process and described in a separate section. Refer to Section 5.2 for details on the procedure associated with consultations where there are likely to be transboundary effects.

Box 12.2 provides an example of how the consideration transboundary effects might be documented in an SEA where no likely significant environmental effects are predicted.

Box 12.2 *Example: Documenting the consideration of transboundary effects*
(Ireland's Ancient East Regional Tourism Strategy, Fáilte Ireland, 2022b)

The scope of the assessment (including description of baseline, the relationship to other plans and programmes and the evaluation of effects) has considered the environment of both Ireland and Northern Ireland. Taking into account, inter alia, the detailed mitigation which has been integrated into the Plan and the status of the Plan (the Plan does not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent), it has been determined that significant residual adverse environmental effects will not occur in either Ireland or Northern Ireland.

13. Mitigation Measures

Key points:

- Where a negative impact is identified in the impact assessment stage, mitigation measures for that impact should be considered at this stage.
- Avoiding impacts is better than minimising them, which in turn is better than compensating for impacts.

Where a potentially significant adverse environmental effect likely to arise from implementation of a plan is identified during the assessment, Annex I (g) of the SEA Directive requires mitigation measures to be provided.

13.1 Hierarchy of mitigation

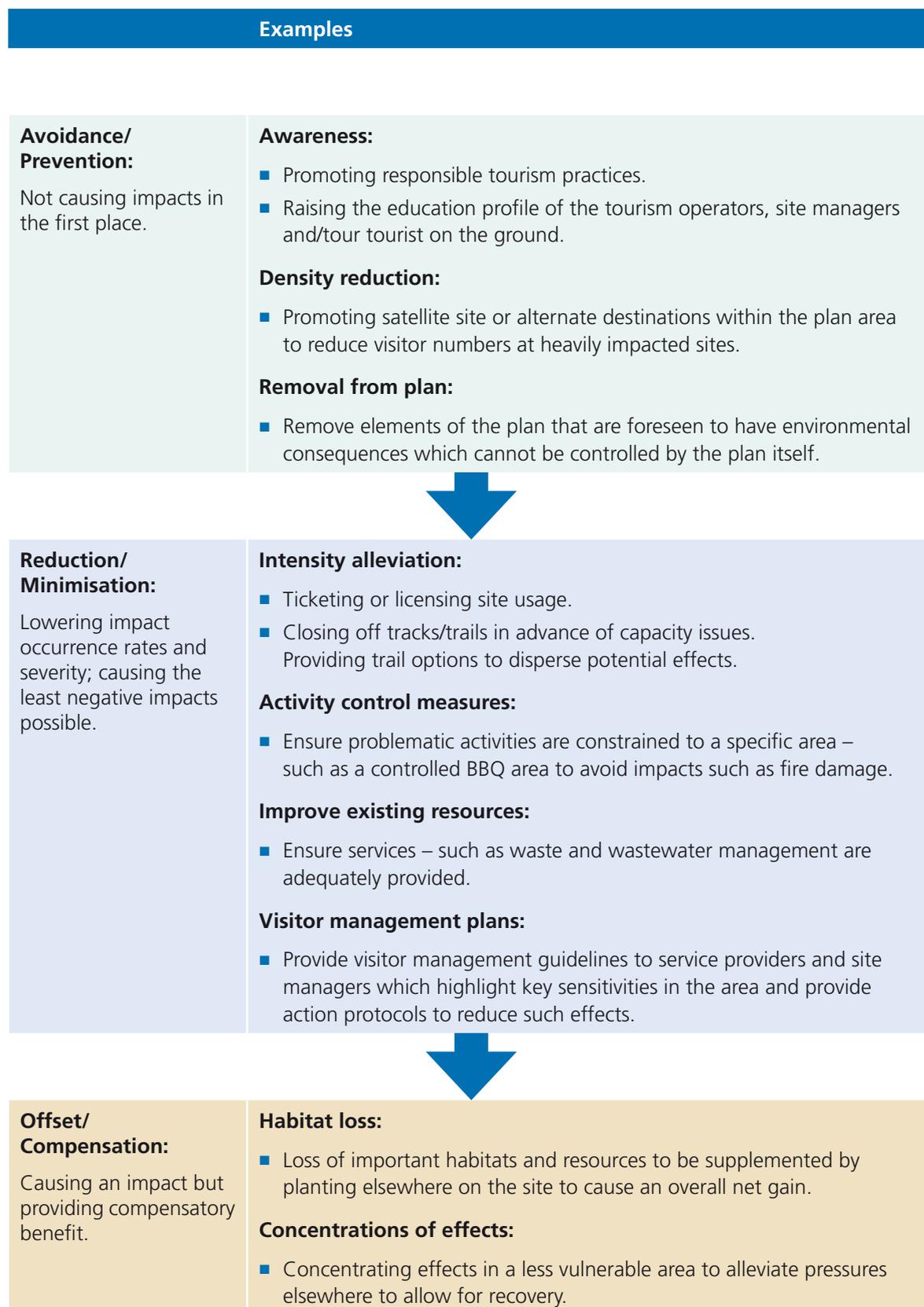
Measures to prevent/avoid, reduce/minimise and offset adverse impacts are called 'mitigation measures'. Within them is a hierarchy: avoidance is generally considered better than reduction, which in turn is generally considered better than offsetting/compensating:

- Prevention/avoidance (e.g. avoiding European site(s) for which tourism is identified as an existing threat or pressure) is generally considered better than
- reduction/minimisation (e.g. reducing the number of visitors in areas that are threatened by visitors), which is considered better than
- compensation/offset (e.g. provide compensatory habitat for habitat lost to a tourism development or activity).

Using this hierarchy, different types of mitigation are suggested in Figure 13.1.

Enhancement should also be considered, for instance supplementary planting or alteration to existing management practices to promote increased biodiversity at a site, which can in turn improve perceived experience of tourism. An example of altering existing management practices would be to replace mowing regimes with low-intensity cattle grazing regimes in coastal grasslands, thereby increasing floral diversity, improving both habitat value and the perceived experience of visitors.

Figure 13.1 'Hierarchy of mitigation measures' for tourism plans



13.2 Strategic mitigation

Table 13.1 shows examples of strategic mitigation. These measures have been used effectively across various Fáilte Ireland SEAs to ensure that mitigation is achieved across the following topics:

- infrastructure capacity, including drinking water, wastewater, waste, transport, traffic volumes and the Water Framework Directive;
- visitor management;
- green infrastructure and ecosystem services;¹⁷
- conflict resolution;
- environmentally responsible promotion;¹⁸
- site management.

Table 13.1 *Example: Selection of strategic mitigation measures* (environmental report for Ireland’s Hidden Heartlands Regional Tourism Strategy, Fáilte Ireland, 2022)

Topic	Requirement
Infrastructure capacity	<ul style="list-style-type: none"> ■ With respect to infrastructural capacity (including drinking water, wastewater, waste and transport) the potential impact on existing infrastructure as well as the potential environmental effects of a likely increase in tourism-related traffic volumes along any routes resulting from the relevant initiative shall be considered and mitigated as appropriate, where relevant. ■ Fáilte Ireland will follow national planning framework guidelines and liaise with relevant planning authorities to ensure any proposed developments are adequately provided for in terms of critical service infrastructure. ■ The promotion of developing visitor friendly infrastructure where it is required will also be encouraged. ■ Any proposed site management and maintenance guidelines produced by Fáilte Ireland will encourage site owners and operators to consider environmentally sustainable solutions and compliance with the Water Framework Directive.

¹⁷ Includes requirement relating to ‘Connecting with nature for health and wellbeing’ (EPA, 2020c).

¹⁸ Environmentally responsible promotion and marketing can be used in visitor management techniques that can help to mitigate adverse effects. Data from surveys and monitoring (see Section 13, ‘Monitoring Measures’) can be used to reduce uncertainties in visitor movements and inform responses in promotion. Environmentally responsible promotion can involve stakeholders, including operators, communities and visitors, thereby enhancing awareness of capacities and facilitating effective interventions where necessary.

Topic	Requirement
Visitor management	<ul style="list-style-type: none"> ■ In contributing towards outcomes under the Strategies, partners and stakeholders shall seek to manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant effects including loss of habitat and disturbance, including ensuring that new projects are a suitable distance from ecological sensitivities. ■ Extensive research by Fáilte Ireland has shown improved environmental outcomes (including improved attainment of conservation objectives) in areas with visitor management strategies. Visitor management strategies may be required from partners and stakeholders who are contributing towards outcomes under the Strategies, as relevant and appropriate.
Green infrastructure and ecosystem services	<ul style="list-style-type: none"> ■ In contributing towards outcomes under the Strategies, partners and stakeholders shall contribute towards the maintenance of existing green infrastructure and its ecosystem services, taking into account the output of the Mapping and Assessment of Ecosystem Services project being undertaken by the NPWS. Proposals for the development of any green infrastructure should demonstrate the synergies that can be achieved with regard to the: provision of open space amenities; sustainable management of water; protection and management of biodiversity; protection of cultural heritage; and protection of protected landscape sensitivities. ■ Where possible, extension of existing greenways and future development of new greenways and blueways should complement and integrate rather than replace existing green infrastructure. Stakeholders considering the development of greenways and blueways should have regard to the Fáilte Ireland publication 'Greenway – Visitor Experience & Interpretation Toolkit' and 'Connecting with nature for health and wellbeing' EPA Research Report 2020.
Conflict resolution	<ul style="list-style-type: none"> ■ Action-based responses are essential at site-specific level in response to instances of environmental perturbation. Although the Strategies are not envisaged as being likely to directly result in any such instances of environmental perturbation, they form part of a hierarchy of tourism initiatives, including lower tier DEDPs, and the wider Statutory planning framework. The process outlined in the Appendix provides for a consistent approach in responding to such issues and is available for integration at DEDP and site-specific levels.
Environmentally responsible promotion	<ul style="list-style-type: none"> ■ Fáilte Ireland will integrate environmental considerations into promotional processes and will ensure environmentally responsible tourism campaigns. Such campaigns will garner environmental stewardship that will help to ensure environmental protection and management. Promotional processes must be informed by environmental considerations, including available capacity, at a local level.
Site management	<ul style="list-style-type: none"> ■ Fáilte Ireland's extensive monitoring of the effects of tourism to date has shown predictors of impact occurrence to include: site type; group type; the number of activities; activity intensity; and the interaction between activity intensity and abundance. Site management must consider these factors in seeking to reduce the potential for impacts to occur and to remove impacts.

13.3 Visitor management and techniques for infrastructure

The majority of tourism and recreational issues arise from management, not development, and management is generally not subject to planning, permitting or licensing. Tourism plans offer an opportunity to provide for mitigation measures relating to management.

- Figure 13.2 details a case study as to how strategic visitor management can help to accommodate increasing numbers of visitors while reducing pressure on archaeological monuments.
- Figure 13.3 suggests how strategic visitor management could be applied in busy coastal zones in order to: minimise traffic; facilitate efficient and effective infrastructure and service provision in nearby settlements; benefit the 'wild' appearance of sensitive landscapes; protect sensitive habitats; and maintain and improve the visitor's experience.
- Figure 13.4 provides examples of appropriate and inappropriate techniques from a publication that developers are required to consult when preparing applications for funding under various tourism plans.

Figure 13.2 Example: Strategic visitor management: Brú na Bóinne (CAAS for Fáilte Ireland, 2020)

APPENDIX 2 – CASE STUDIES

The Brú na Bóinne Visitor Management Strategy has successfully implemented the concept of separating visitor attractions from visitor facilities at a strategic level and has now been reproduced in many international locations.

This Appendix looks at this site specifically as a practical example. It aims to illustrate how this concept could be applied to attractions in the coastal zone along the Wild Atlantic Way. It also illustrates how visitor facilities can gradually be moved away from the most sensitive and significant near coastal zones and into more robust near-by areas of managed agricultural lands.

CASE STUDY 1 – STRATEGIC VISITOR MANAGEMENT - BRU NA BOINNE

A cluster of 3 large Neolithic passage tombs – Knowth, Newgrange and Dowth, are one of Ireland's most important archaeological sites. They are protected by a Visitor Management Plan.

Located less than an hour from Dublin, the site annually attracts hundreds of thousands of visitors. These ancient sites have a limited capacity to accommodate visitors without causing wear and tear to the fabric and context of the monuments – or reducing the quality of the visitor experience.

Landowners, local and state agencies have collaborated since 1995 to devise a strategy to manage visitor numbers - with the objective of accommodating ever increasing numbers – yet reducing pressure on the monuments.

At the core of the strategy lay two simple approaches;

1. to spread the load more evenly between the three sites
2. to move parking, shops, cafes and visitor facilities away from the monuments.

The diagrams illustrate how the original overcrowding was reduced by a combination of the removal of direct car access to the monuments and by the provision of new visitor facilities at a site south of the river.

This approach has succeeded in reducing 2017 visitor numbers to the Newgrange monument to levels last experienced in 1988.

This pioneering technique is now being widely adopted.

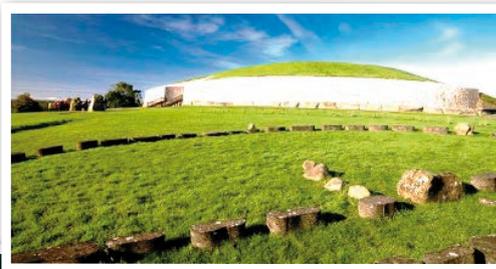
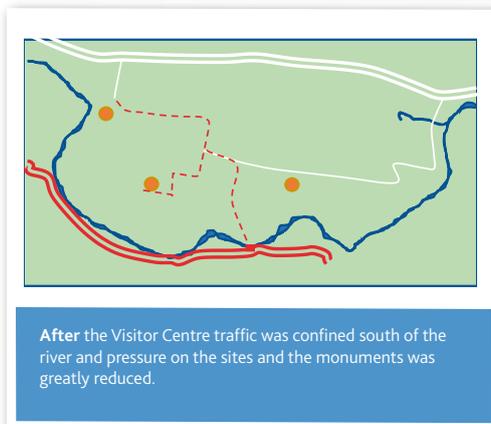
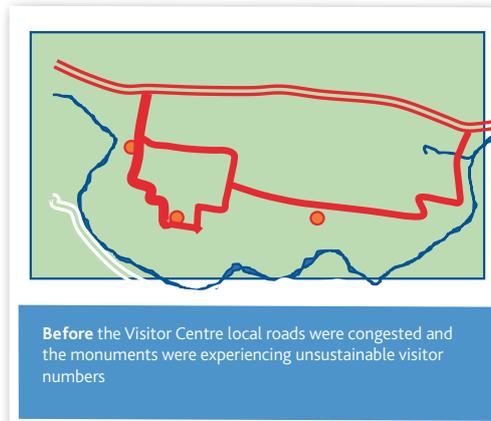


Figure 13.3 *Suggestion: Strategic visitor management in busy coastal zones* (Visitor Management Guidelines for the Wild Atlantic Way, CAAS for Fáilte Ireland, 2020)

CASE STUDY 2 - STRATEGIC VISITOR MANAGEMENT – POTENTIAL FUTURE APPLICATION IN BUSY COSTAL ZONE

It is possible to grow visitor numbers while also increasing the wildness of the more intensively used coastal locations by adopting a strategic approach.

The graphic below illustrates the options that might be available to site owners or operators and how considering the "more wild option" could be realised for an iconic cliff-top viewing point. This may be applicable to recommendations and actions coming from the recently completed Wild Atlantic Way Route Review.

As numbers increase, on-site facilities – such as parking, toilets and shops – can be relocated away from the coast to existing nearby settlements and villages. Here, visitors pay for parking in return for a free minibus to the coastal features. Visitors may also opt to hike or cycle to the coast. The visitor facilities would augment the existing business in the settlements, as well as allowing more mixing with locals.

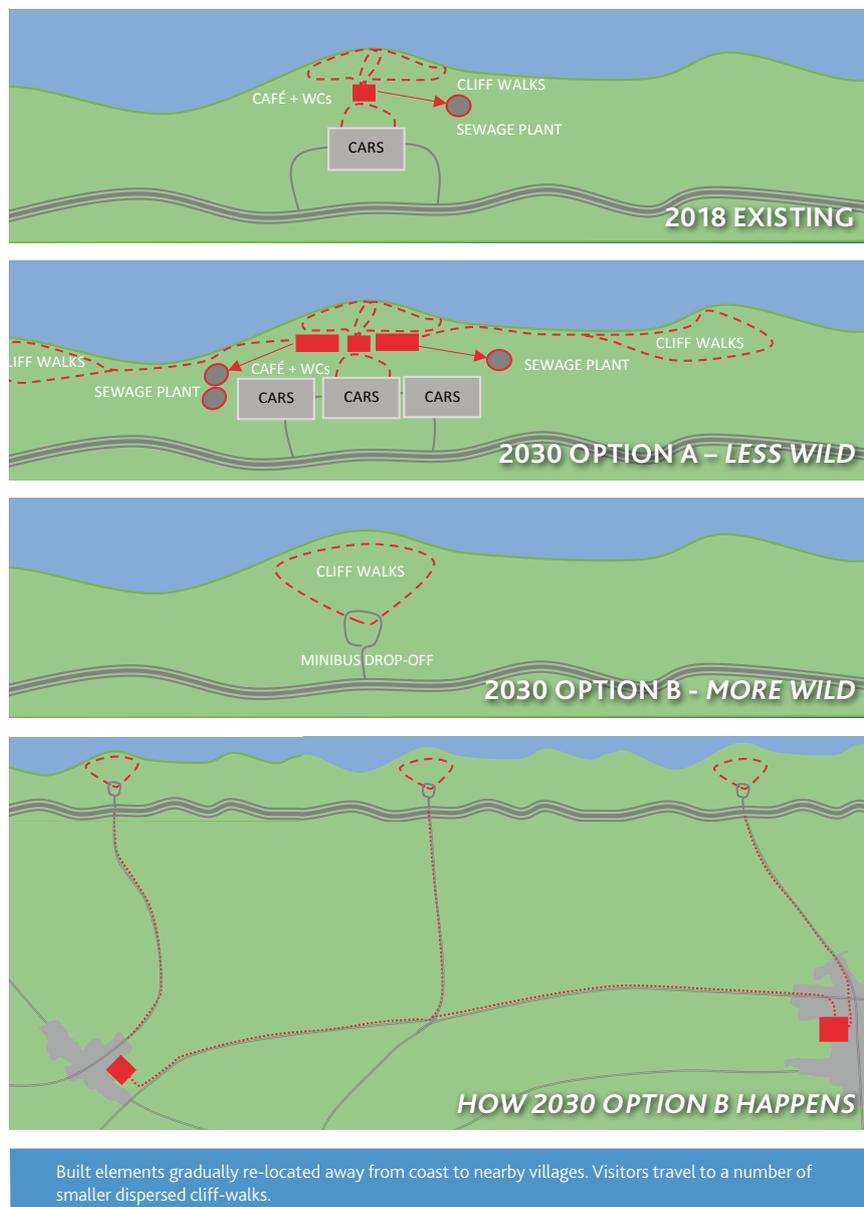


Figure 13.4 Examples: Techniques for infrastructure (Visitor Management Guidelines for the Wild Atlantic Way, CAAS for Fáilte Ireland, 2020)

		EXAMPLES	USE APPROPRIATE TECHNIQUES			EXAMPLES	INAPPROPRIATE TECHNIQUES
LEARNING FROM SUCCESS			Flexible and adaptive structures, such as this partially floating walkway – allow access through sensitive tidal areas – without the requirement for intrusive permanent civil engineering projects.	LEARNING FROM MISTAKES			Good Technique – Wrong Place Boardwalks can be successful in wetland or dune sites – but winter storm waves and surges on exposed beaches can quickly damage them.
			Appropriate Techniques that are most suitable for the receiving environment. This example of a boardwalk is fixed directly onto a sandy, well-drained surface – which permits these attractive flowing lines. These are suitable for areas in the vicinity of dunes.				Good Materials – Wrong Place Stainless steel, insitu concrete and grass sward have very high resistance to extreme weather – but not to the actions of the sheep who roam this visitor attraction.
			Appropriate Applications, such as the construction of this boardwalk involves elevation of the structure above the saturated peats in this example.				Good Design – Poor Management Mown grass paths can be unobtrusive and robust. However, they need to be regularly rotated with due consideration to the resilience of the specific species of the underlying vegetation.
			The supporting timber framework results in a very different appearance – with a defined edge composed of straight segments. These are suitable for areas commonly found near cliff edges and rock shores.				Good Intention – Poor Execution Concerns about controlling erosion, traffic, safety and convenience appear to have squeezed natural features from a number of coastal locations on the coast.
							Good Intentions – Wrong Place Artificial floral displays that are appropriate in parks and urban areas are not compatible with the aim of sustaining the wilderness character of the WAW. They also require levels of care and maintenance that are often unrealistic at more remote coastal sites.

13.4 Climate action

The Government's National Climate Action Plan 2023 supports minimising negative environmental impacts of tourism. It includes actions associated with a just transition plan for the midlands region. These actions relate to supporting regeneration, repurposing and sustainable development of walking and cycling tracks and trails and waterways.

Measures within tourism plans that encourage low-carbon travel, such as walking and cycling, low-carbon activities and the circular economy, can help to minimise any increases in, and reduce, emissions. Issues that can be addressed by the wider planning framework include:

- the relevant policies and objectives of regional and local authority level land use plans;
- Integrated land use/transport planning, including taking into account existing and future demand and capacities and the need to integrate connectivity and accessibility to tourism locations;
- prioritisation of low-carbon options and improving frequency of public transport.

13.5 Documenting the integration of mitigation

The SEA Environmental Report should document what mitigation measures have been recommended, and where relevant whether they have been incorporated into the tourism plan. This chapter of the SEA Environmental Report should also identify which of the mitigation measures resulted from the Appropriate Assessment process. Many mitigation measures will already be part of the plan, or will have been added to the plan as it was developed. This information will also be useful for the post-adoption SEA statement (see Section 16). It can be useful and is recommended to link mitigation measures with likely significant effects, by way of a table. The example at Table 13.2 demonstrates how significant effects identified by the SEA can be linked to specific measures that have been integrated into the tourism plan in order to mitigate these effects.

Table 13.2 *Example: Linking effects to mitigation* (Extract from Inis Cealtra Visitor Management and Sustainable Tourism Plan, Clare County Council, 2017a)

Strategic Environmental Objectives	Potential Significant Effects from plan implementation	Mitigation Measures developed through SEA and AA.
<p>Features and Objects of Archaeological Interest</p> <p>CDP15.10 Development Plan Objective: Zones of Archaeological Protection</p> <p>CDP15.13 Development Plan Objective: Underwater Archaeology</p> <p>CDP 15.14 Development Plan Objective: Cultural Development</p>		
<p>Biodiversity, Flora and Fauna</p>		
<p>B1 – Protect, conserve, enhance where possible and avoid loss of diversity and integrity of the broad range of habitats,</p>	<p>The potential impacts associated with increasing visitor numbers relate to potential disturbance to species and habitats, particularly during seasons when they are more sensitive to disturbance associated with human activity</p>	<p>Visitor Management Mitigation Measures in particular</p>
<p>B2 – To achieve the conservation objectives of European Sites (SACs and SPAs) and other sites of nature conservation. species and wildlife corridors.</p>	<p>Construction activities and potential pollution incidents.</p>	<p>MM1 Seasonality</p> <p>Access and Transport AT2</p> <p>Physical Proposals in particular PP14 to PP18</p>
<p>B3 - Conserve and protect other sites of nature conservation including NHAs, pNHAs, National Parks, Nature Reserves, Wildfowl Sanctuaries as well as protected species outside these areas as covered by the Wildlife Act.</p>	<p>Accidental introduction of alien and invasive species</p>	<p>Shoreline and Pier Proposals SP2, SP6 and SP7</p> <p>Grazing and Woodland Management, in particular GW4, GW5 and GW 17</p> <p>Pathways in particular P5 and P6</p>
<p>B4 - Meet the requirements of the Water Framework Directive and the Shannon River Basin Management Plan/National River Basin Management Plan</p>	<p>Increased footfall could give rise to effects associated with trampling, new informal paths into more sensitive archaeological and ecological areas, subsequent erosion of soil and increase in rank grass species.</p>	<p>Toilet Facilities TF6</p> <p>CDP 14.2 Development Plan Objective: European Sites</p>
<p>B5 – To minimise and, where possible, eliminate threats to bio-diversity including invasive species.</p>	<p>Disturbance to bat species</p>	<p>CDP 14.3 Development Plan Objective: Requirement for Appropriate Assessment under the Habitats Directive</p>
<p>B6 - Promote green infrastructure networks, including riparian zones and wildlife corridors</p>	<p>Loss of habitats or declining quality of habitats.</p>	<p>CDP 14.11 Development Plan Objective:</p>

14. Monitoring Measures

Key points:

- Monitoring provides information on the actual impacts of the plan's implementation. This allows fine-tuning of the plan in response to problems. It also provides valuable information for any next round of plan-making.
- Monitoring should aim to identify not just whether problems occur but why they occur.

Annex I (i) of the SEA Directive requires the environmental report to describe 'the measures envisaged concerning monitoring in accordance with Article 10'. Article 10 of the SEA Directive requires the significant effects of plans and programmes of plans to be monitored, in part so that future rounds of impact predictions can be based on better evidence, and also so that unforeseen adverse effects impacts can be identified at an early stage, and appropriate remedial action can be undertaken.

The EPA has published good practice guidance on SEA statements and monitoring (EPA, 2020b), which can be a useful reference document when preparing monitoring measures and SEA statements. Monitoring frameworks are normally related to the SEA framework (Section 10).

Monitoring can inform future iterations of the tourism plan and/or lower tier plans and programmes, while also ensuring the efficacy of the mitigation measures within the plan. Monitoring can be accompanied by mechanisms and procedures for remedial action that facilitate responses to adverse results.

14.1 Focus of monitoring programmes

Monitoring frameworks should thus focus on:

- significant negative residual (post-mitigation) effects predicted in the SEA;
- ensuring that monitoring is undertaken, by specifying who is responsible for monitoring and how frequently it should take place;
- making the monitoring information publicly available, as a resource to support the ongoing implementation, and review where appropriate, of the plan;
- ensuring that unforeseen adverse impacts identified through monitoring are dealt with in a timely manner.

Box 14.1 details a case study of a monitoring programme that was prepared as part of the SEA of a tourism plan and implemented since adoption of the plan.

Box 14.1 *Example: SEA monitoring programme for Fáilte Ireland's Wild Atlantic Way operational programme 2015-2019* (environmental report for the Wild Atlantic Way Operational Programme 2015-2019, Fáilte Ireland, 2015; 2018 'Visitor Observation Study Results – Environmental Surveying and Monitoring of the Wild Atlantic Way Operational Programme', Fáilte Ireland, 2019)

The Operational Programme for the Wild Atlantic Way [WAW] sets out a strategy for the coordination and linking of a number of existing touring routes stretching approximately 2,500km along the Atlantic coast from Donegal to West Cork. This stretch of the coast is subject to various ecological designations.

Along the route, there are various Discovery Points (existing viewing points and lay-bys). Fáilte Ireland is co-ordinating and funding future WAW works relating to the Discovery Points through the Operational Programme, but not developing any of these works – they will be developed by the relevant local authorities and others. 'Site Maintenance Guidelines' have been integrated into Operational Programme providing environmental requirements in relation to parking surfaces, boundaries, signage, seating, facilities, lighting – as a condition of funding.

A comprehensive and detailed monitoring programme was set out in the SEA ER and SEA Statement for Fáilte Ireland's Wild Atlantic Way Operational Programme 2015–2019.

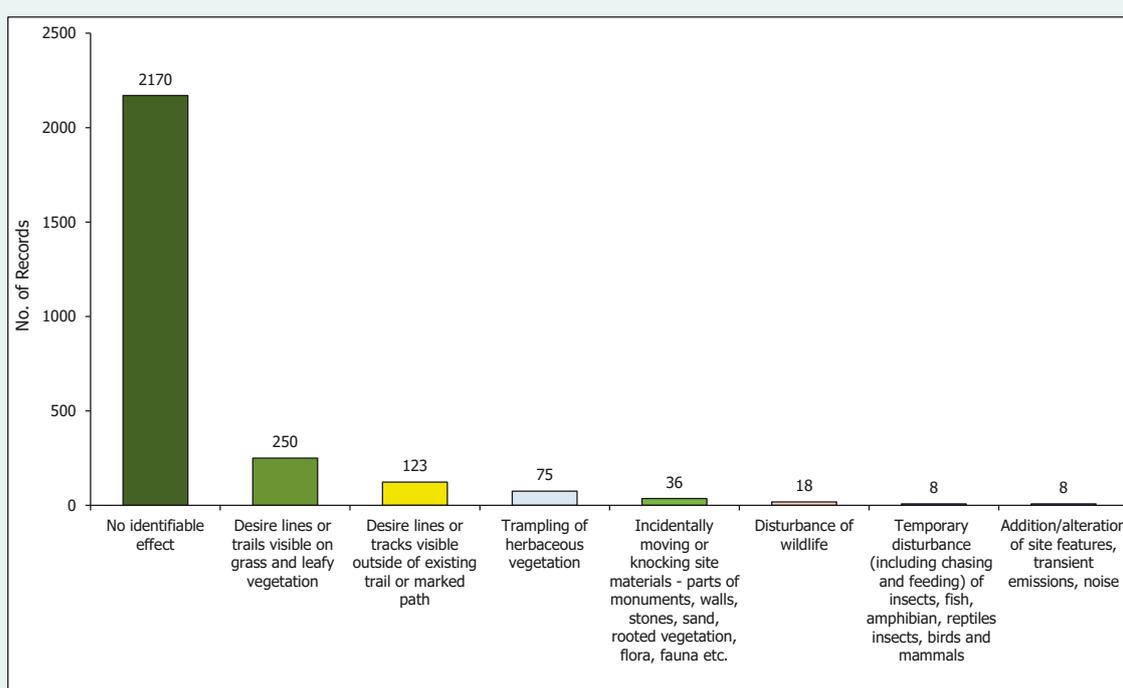
This is being implemented by Fáilte Ireland and includes:

1. Macro monitoring of Regional/County visitor numbers and associated level effects caused by the visitor contributions to loadings on transportation, waste and water infrastructure;
2. Site Surveys of visitor behaviour to describe general activities and associated environmental effects of visitors; and
3. Site Surveys to describe the specific effects on the ecology of areas that were observed to have been used/trafficked by visitors.

A Monitoring Group was established with a wide range of stakeholders that meets a number of times per year. Reporting is done annually.

Thresholds and Corrective Action were also integrated into the Monitoring Programme. The route and the Discovery Points may change if visitor activity and/or visitor intensification is predicted or observed to result in a negative impact on the environment in particular locations. Changes that could be made include the de-marketing of candidate Discovery Points, the removal of signage and the temporary or permanent removal of candidate Discovery Points from the route.

The findings of the Monitoring Programme show that, in general, visitors cause no identifiable effect on habitat or species. Where adverse effects are identified, these feed into visitor management strategies undertaken by Fáilte Ireland.



Range of impacts observed across all sites 2014–2018 (Fáilte Ireland, 2019a)

14.2 Sources of information

As demonstrated on Figure 6.1, tourism plans/programmes will be situated alongside a hierarchy of statutory documents setting out public policy for, among other things, land use development, tourism, infrastructure, sustainable development, environmental protection and environmental management. These other existing policies, plans, etc. will have been subject to their own environmental assessment processes, as relevant, and will form the decision-making and consent-granting framework. In developing monitoring programmes for tourism plans and programmes, the competent authority should take into account this hierarchy of planning and associated environmental monitoring.

Monitoring sources that may be useful include:

- information from existing and new environmental monitoring programmes for other tourism plans/programmes that the competent authority may be responsible for;
- existing sources maintained by local authorities (such as those arising from the SEA of land use plans) and the relevant authorities, e.g. the Environmental Protection Agency, the National Parks and Wildlife Service and the Central Statistics Office;
- emerging new information such as that from the Government's National Climate Action Plan 2023, which includes various measures to improve the evidence base for sustainable tourism.¹⁹

¹⁹ For example, utilise Destination Experience Development Plans to measure environmental impacts at key tourism destinations, commence a process to establish a benchmark CO₂ value for Irish tourism and develop a mechanism that allows industry to report on carbon reduction and offsetting measures.

14.3 Thresholds and remedial actions

Ideally, in order to ensure the effectiveness of monitoring programmes, threshold limits and remedial actions to address any exceedances recorded should be identified alongside organisational procedures for taking action. This will help to facilitate the resolution of all exceedances or issues in an efficient and controlled manner.

Remedial actions may relate to environmentally responsible promotion and marketing, which can be used in visitor management techniques. Data from surveys and monitoring can be used to reduce uncertainties in visitor movements. Environmentally responsible promotion can involve stakeholders, including operators, communities and visitors, thereby enhancing awareness of capacities and facilitating effective interventions where necessary. Other remedial actions may limit activities or change management practices to reduce impacts identified. There is a need to inform relevant stakeholders responsible for providing supporting actions or measures (such as local authorities, Irish Water and the Office of Public Works) of the findings of the monitoring programme and any remedial actions undertaken.

14.4 Integration and reporting

SEA monitoring should be aligned with the ongoing review of the implementation of the subject plan or programme. For instance, the Planning and Development Act requires development plans to be reviewed after six years, and a monitoring report on the implementation of the plan to be prepared two years after adoption: the SEA monitoring information should be included in that monitoring report. Such a procedure could be provided for within tourism plans also.

Table 14.1 shows an example of a monitoring programme, including timescale/frequency of monitoring, that integrates environmental monitoring with monitoring of tourism plan actions.

Table 14.1 Example: Part of SEA monitoring programme (Sceilg Mhichil World Heritage Property Management Plan, National Monuments Service, 2021a)

Management Objective	Applicable Actions	Targets/Indicators	Timescales
Objective 4: To identify and preserve the natural heritage of the island	A4.1: Prepare site-specific conservation objectives for the bird species for which the Skelligs SPA has been designated. Include quantitative conservation objectives attributes and targets.	<ol style="list-style-type: none"> 1. Continue the monitoring of the SCI's of Skelligs SPA to determine species specific issues and population levels (As per Actions 4.5 and 4.6 in the management plan). 2. Available information on the ecological requirements of each of the SCIs of the Skelligs SPA used to select suitable attributes with targets for conservation objective-setting. Available monitoring data used to set targets for each attribute, which will be quantitative where possible. 3. Where necessary, refine quantitative attributes and targets as further monitoring data becomes available. 	<ol style="list-style-type: none"> 1. Ongoing. 2. Within 1 year of Plan's adoption. 3. Within 5 years of Plan's adoption.
	A4.2: Maintain close cooperation between the SMIG, the Property Management Team, the NPWS and the Guide team.	<ol style="list-style-type: none"> 1. Schedule regular meetings between the interested parties. 2. Summary of meetings disseminated within the team and to the interested parties. 	<ol style="list-style-type: none"> 1. Ongoing, quarterly from the Plan's adoption, twice yearly in respect of Guide team. 2. 1 week after meeting is held.
	A4.4: Ensure an ecological assessment is undertaken for any project or activity which might significantly impact on the biodiversity of the island (including Screening for Appropriate Assessment and Appropriate Assessment if necessary, for any plan or project likely to have a significant effect on the species and their habitats for which the SPA has been designated) so that nature conservation issues are considered alongside built heritage.	<ol style="list-style-type: none"> 1. OPW to conduct initial ecological assessment and consult with NPWS/ecological experts as required. 2. Screening for AA and AA undertaken as required for any project where significant effects on the Skelligs SPA are possible. 3. Summary of assessments conducted each year released. 	<ol style="list-style-type: none"> 1. Ongoing as required. 2. Ongoing as required. 3. Annually each January.

15. Finishing the Environmental Report

Key points:

- When you have completed this stage, you may want to go back to Table 2.1 and carry out a self-test before making your Environmental Report public.

When the environmental report is prepared, it may be useful to assess it against the criteria detailed earlier in this guidance note at Table 2.1 in advance of public display.

The EPA's SEA Pack (EPA, 2021d) includes an SEA process checklist that can assist in ensuring the relevant information is included, as appropriate, at the various stages of preparing the SEA and plan/programme.

The environmental report can broadly be structured along the lines of Table 1.1, which is reflected in the table of contents of this note.

Four additional concluding sections need to be added:

1. Non-technical summary – which can be useful to provide at the beginning of the environmental report;
2. Difficulties encountered – which can be included in an earlier section on methodology;
3. Comments made by stakeholders (including the public, where relevant) as part of the SEA scoping process/plan scoping process, and how the SEA/planning team responded to them;
4. Next steps in the SEA process.

These are now dealt with in turn.

15.1 Non-technical summary

Annex I (j) of the SEA Directive requires the environmental report to include 'a non-technical summary of the information provided under the above headings'. In other words, the non-technical summary should summarise the information provided in the main report, and not just describe how the main report has been compiled. The non-technical summary should provide a brief discussion of the policy and environmental context, alternatives considered, main impacts of the plan and alternatives, mitigation measures, monitoring arrangements, etc.

The non-technical summary should be concise and should avoid scientific terms. The inclusion of suitable maps and tables can be particularly useful.

15.2 Difficulties encountered

Annex I (h) of the SEA Directive requires the environmental report to include a description of 'any difficulties (such as technical deficiencies or lack of know-how) encountered' in compiling the required information'.

Difficulties encountered could include:

- a plan's strategic, non-spatial and/or non-specific character, making assessment difficult;
- a plan's transboundary and multi-jurisdictional aspects;
- lack of baseline data, for instance about population and human health, the marine environment or past environmental trends;
- data that have not recently been updated;
- challenges in assessing the effects of new technologies due to a lack of data about the impacts of these technologies.

Boxes 15.1 and 15.2 show examples of how difficulties faced can be described.

Box 15.1 *Example: Difficulties encountered* (Tourism Masterplan for the Shannon Region, Waterways Ireland, 2020a)

Difficulties were encountered in the development of the Shannon Masterplan and in the SEA of the Shannon Masterplan due to the transboundary and the multi-jurisdictional aspects of the Masterplan as the length spans 10 administrative boundaries in Ireland, and 1 administrative boundary in Northern Ireland.

There are a number of stakeholders involved in the formation of the Masterplan with differing priorities and amounts/levels of information which must feed into the Shannon Masterplan and the corresponding SEA. Due to these variances, there are difficulties in the creation of an even assessment across the potential alternatives in the Shannon Masterplan as to focus into significant project details in one section which may have more information will not lead to a balanced assessment of alternatives.

Due to these reasons, it was important to determine a strategic level of assessment that is replicable across all alternatives.

Box 15.2 *Example: Difficulties encountered* (Wild Atlantic Way Operational Programme, Fáilte Ireland, 2015 – referring to a centralised database of environmental baseline data sets)

A challenge to the undertaking the SEA and a future challenge for lower tier assessments and decision-making by local authorities is the lack of a centralised database including data (for both Ireland and Northern Ireland) that could make all environmental baseline data readily available and in a consistent format. This challenge is one which is encountered for various plans, programmes and projects and is overcome by investing time resources in assimilating information from various sources. The information used by the assessment and referred to in this report is appropriate for this level of decision-making and environmental assessment.

15.3 Summary of influence of the SEA process

A summary of the influence the SEA process has had on the plan/programme can add transparency and be useful to those reading the plan or the SEA. Such a summary can also be helpful in the preparation of the post-adoption SEA statement.

15.4 Next steps

It can be useful to include a final section in the environmental report to explain what happens next. This will be consultation on the draft plan and environmental report, subsequent amendments to the draft plan and environmental report, and various steps towards plan adoption. Readers should be told when and where they can submit their opinions/observations.

This can be succinct, for instance:

- This environmental report is being published alongside the draft plan for formal consultation. A written submission or observation with respect to the draft plan and associated environmental report may be made to the competent authority within a specified period.
- Feedback received from consultees will be documented and considered in reviewing the proposals for the draft plan. A post-adoption statement (referred to as an SEA statement²⁰) will summarise how the environmental report and the consultation responses have been taken into account and how environmental considerations have been integrated into the final decisions regarding the plan.
- Where the plan is materially amended in response to consultee feedback, these amendments should be screened to determine whether they are likely to have significant environmental effects, and reassessed if they are. A subsequent stage of public consultation may be required where amendments are considered significantly material and/or have been determined as being likely to have significant environmental effects.

20 The EPA has published good practice guidance on SEA Statements and Monitoring (EPA, 2020b), which can be a useful reference document when preparing monitoring measures and SEA Statements.

16. Post-Adoption SEA Statement (Information on the Decision) and Monitoring

Key points:

- After the plan has been adopted, an 'SEA statement' must be prepared that explains how environmental information was taken into account in the plan-making process and how the plan's impacts will be monitored.
- The SEA statement should focus on the changes made to the plan in response to the SEA process.
- It is important to note that *much of this should ideally also be included in the environmental report, to show that the SEA process has influenced the plan-making process.*

16.1 Information required post adoption

Once a plan is adopted, Article 9 of the SEA Directive requires the following information to be made available to the environmental authorities, the public and other Member States (if required).

Table 16.1 Information required by Article 9 of the SEA Directive

Information requirement	Covered in this guidance at:
1. The adopted plan –	–
2. An 'SEA statement' that summarises: <ul style="list-style-type: none"> ■ how environmental considerations have been integrated into the plan and how the environmental report has been taken into account; ■ how the opinions of statutory consultees, the public and any relevant other countries have been taken into account; ■ the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with. 	<p>Figures 5.1 and 5.2, and the rest of this section</p> <p>Section 5.2</p> <p>Section 11.4</p>
3. The measures decided concerning monitoring	Section 14

16.2 SEA statement

The EPA's (2020b) guidance on SEA statements and monitoring provides useful guidance for this section. The SEA statement essentially 'tells the story' of the SEA process, and can give a good indication of whether the process was carried out in a timely and effective manner.

If a good practice SEA process has already been followed, most of the information that an SEA statement must cover will already be available, and can simply be copied from the environmental report/other SEA documents into the SEA statement. The remaining requirement – how environmental considerations have been integrated into the plan – can involve a description of how the SEA was carried out: who was involved, relevant dates, and a flowchart that shows the key links between the stages of plan-making and SEA stages. Figure 5.1 from earlier in this guidance note shows an example of this.

The main findings and recommendations of the SEA process are summarised, as well as changes made to the plan in response to the findings/recommendations.

Box 16.1 provides an example of how consultations throughout the plan-preparation/SEA process could be summarised, while Table 16.1 provides an example of documenting how the opinions provided in written submissions as part of the plan-preparation/SEA process have been taken into account.

Table 16.2 shows how environmental considerations have been integrated into a tourism plan through the plan-preparation/SEA process by showing how, in advance of public display of the draft plan, the wordings of actions were updated and how new actions were added to the plan.

Monitoring measures are also required to be included in the environmental report and these have been covered under Section 14 of this guidance note.

Box 16.1 *Example: Summary of consultations throughout the plan preparation/SEA process*
(Tourism Masterplan for the Shannon Region, Waterways Ireland, 2020b)

Working/ Steering Group

Formal meetings were held throughout the development of the Shannon Masterplan with the project Working Group, comprising representatives of Waterways Ireland and Fáilte Ireland. Additional consultations and feedback were held with the Steering Group, comprising representatives of the Working Group and representatives of the ten Local Authorities that are adjacent to the Shannon and Shannon and Shannon Erne Waterway.

Consultations

A range of key consultations were held with the executive teams (CEO, Directors of Services) of each of the ten counties adjacent to the Shannon in late 2018. Additionally, consultations were held with the various statutory bodies, responsible for aspects of the management of the Shannon and Shannon Erne Waterway, including: Waterways Ireland, Fáilte Ireland, NPWS, EPA, OPW, National Monuments Service and ESB. Electronic communications were held with the Inland Fisheries Ireland, Coillte and Bord na Mona. Additional consultations were held with Irish Boat Rental Association (IBRA), Inland Waterways Association of Ireland and a number of other NGOs.

Consultations were held with tourism and heritage officers in each local authority through workshops. Workshops commenced in November 2018 and continued with tourism trade and SMEs in a series of sub-regional workshops in late January 2019. Community representatives, tourism activity and service providers were consulted through the thematic framework workshops, with follow-on consultations with individuals and groups.

Summary of consultations

All consultations were noted in the course of the Study. These responses were analysed in further detail to provide inputs to the development of the strategic initiatives in the Masterplan (Volume 2).

Thematic Workshop

The Thematic Workshop on the 29th November 2018 attracted 29 people. They represented all parts of the Shannon and a wide range of interests, with tourism, archaeology, wildlife, folklore, history and river-based recreation being particularly well-represented (see Participant Interests document).

During the workshop the participants discussed the special and distinctive qualities of the Shannon in depth. These deliberations focused on six provisional thematic areas that had been derived from discussions with the consultant team and the client Working Group. The goal of the workshop was to test and refine these six themes and, if possible, reduce the number.

The provisional themes were:

- The Living Shannon
- Shannon routes, crossings and meetings
- The Timeless Shannon
- Wellspring of Early Christianity
- People of the River Shannon
- The Shannon, mighty river of Ireland

Review of themes: Stage 1

The workshop tested how far the provisional themes aligned with participants' sense of what was special and distinctive about the Shannon.

This raw data showed:

- an extremely good match – of 200 responses all but three fitted this provisional thematic framework
- all the provisional themes had traction – i.e. they all attracted good numbers of responses

These results were reported to the Project Steering Group on November 30 who responded warmly to the six provisional themes. They said these expressed the Shannon accurately.

Outcome

The conclusion from this stage is that the provisional themes are essentially correct and there is nothing missing. This indicates that they could be refined and streamlined but should not be profoundly altered.

Review of themes: Stage 2

The workshop outputs were scrutinised for overlap and duplication between the themes and the comparative strength of responses. Responses that suggest strong themes are specific to the Shannon, diverse, place-based and/or detailed. Responses that indicate weaker themes are fewer and more generic (e.g. 'culture', 'history', 'nature').

In a group exercise of this type the difference between strong and weak responses can indicate the topics that people are most motivated by i.e. the ones that they are most interested to talk about. This suggests a stronger basis for developing tourism products.

Our analysis of participants' interests suggested that the weaker responses in the workshop were not usually due to under-representation of knowledge areas.

This exercise showed:

Responses for The Timeless Shannon, Shannon routes, crossings and meetings, and the landscape and activity elements of The Living Shannon were particularly strong and substantial.

This suggests these are the strongest themes.

- The Wellspring of Early Christianity is strong, but more limited in scope. Many of the responses here were duplicates from elsewhere. This suggests this is a sub-theme, probably of Shannon routes, crossings and meeting).
- The responses on the nature and biodiversity aspects of The Living Shannon were non-specific. There was wildlife expertise in the room so this suggests that this may not be a strong theme. It would be helpful to talk to a specialist to explore this further.
- Similarly, the responses on People of the Shannon were few and generic e.g. 'craft', 'heritage', 'traditional culture and beliefs'. In this case it could be that people in the room did not know enough about the topic. Alternatively, it may be that this area is not particularly locally distinctive, or that local people do not recognise it or that they do not want to talk about it. A theme that relates directly to contemporary life on the Shannon is vital for the Tourism Masterplan so it will be important to explore this further at the local workshops.
- The importance of the islands and the stories came out strongly and was mentioned in several of themes. This suggests this is an under-told story that participants would like to see highlighted more. We need more information on these stories.
- The scale of the river and its status as the longest in the British Isles was emphasised in several of the themes. This has also been highlighted in many of our conversations. It seems resonant; this scale seems symbolic as well as geographic. This is a core idea around which people unite.

These considerations fed into the re-drafting of the themes.

Parting shots

The workshop concluded with a parting shots exercise. This allows the participants who have spent the previous few hours in tightly structured group conversations to make an individual comment about any aspect of the Tourism Masterplanning. It is an important technique for ascertaining concerns that people may not wish to express in the group. The results are in the Parting Shots Responses document.

The striking thing about the results of this exercise from this group, when compared with many other workshop groups in a wide range of situations, is the consistency of the responses. Over 40% (12 out of 29) of respondents choose to emphasise the importance of sustainable development and the importance of conserving the natural environment of the Shannon. This will inform many aspects of the Masterplan and suggests theming around the value of the natural environment is important.

The other responses from this exercise focused on improved access and infrastructure (8 out of 29 responses) and the need for local people to be involved in the development of tourism and to benefit from it (6 out of 29 responses).

Table 16.2 *Example:* Documenting how written submissions were taken into account (Inis Cealtra Visitor Management and Sustainable Tourism Plan, Clare County Council, 2017b)

Summary of submission	Action/amendment proposed to the Plan documents	SEA and AA Response
Location of interpretative centre -Consider using the Rectory-unoccupied, visual link to island from 1 st floor, adequate land/space for parking, planning not a problem, and likely to be available at a competitive price	Add Rectory as a site no 12 (table 3-1 page 44), and reassess. Add language to Objective 5 to allow Rectory building, or south part of its site be considered (at the time of design of the VMSTDP), should the previously identified site be unfeasible.	The SEA will assess the Rectory site as part of updating the Consideration of Alternatives Section of the SEA ER. The site will be assessed in line with the SEOs prepared for the SEA ER. Objective 5 will be assessed as part of the SEA screening process also upon receipt of additional text.

Table 16.3 *Example:* Integration of environmental considerations – updated and new actions (Sceilg Mhichil World Heritage Property Management Plan, National Monuments Service, 2021b)

Original Action	Updated Action	Justification for Change
Action 4.1: Prepare site-specific conservation objectives for the bird species for which the Skelligs SPA has been designated.	Action 4.1: Prepare site-specific conservation objectives for the bird species for which the Skelligs SPA has been designated. Include quantitative conservation objectives attributes and targets.	The additional wording is recommended to make it clear that the conservation objectives will include attributes and targets so that the status of each species can be clearly assessed against what has been defined as a favourable conservation status. To enable a quantitative assessment, population trends, range and use of area for each species would be required. This will be an output from Action A4.5 which will continue to develop the seabird monitoring programme. Therefore, the timelines for completing this Action would need to be phased.
Action 4.10: Ensure that helicopter flights over and in the vicinity of Skelligs SPA are avoided during the birds' breeding season.	Action 4.10: Exclude recreational and other non-essential helicopter flights from an exclusion zone of 1km surrounding Skelligs SPA.	In the event that helicopter flights over Sceilg Mhichil continue into the future, limitations on the distance they are permitted to fly within should be implemented. This will limit the negative effects of their presence on birds (from noise disturbance, buffeting from the rotors downdraft and bird strikes), as well as noise disturbance to visitors to the site, thus improving the visitor experience.
Action 6.1: Continue to manage the National Monument, Nature Reserve and SPA at Sceilg Mhichil while allowing a system of managed public access	Action 6.1: Continue to balance the need to preserve the integrity of the National Monument, Nature Reserve and SPA at Sceilg Mhichil while allowing a system of managed public access so as to ensure the conservation of the	Wording has been changed to clarify that the WHS taking priority does not mean that the cultural heritage features will take priority over the natural heritage features of the site.

Objective	Proposed Action	Reasoning
<p>Objective 2: To improve liaison with local interest groups and other relevant parties</p>	<p>Action 2.5: Make publicly available existing and future reports on Sceilg Mhichíl via a dedicated website page for Sceilg Mhichíl.</p>	<p>This will provide greater transparency to the decision-making process on Sceilg Mhichíl and the data that underpins these decisions.</p>
<p>Objective 4: To identify and preserve the natural heritage of the island</p>	<p>Action 4.14: Develop guidance for boat operators to follow to reduce potential impacts on wildlife on Sceilg Mhichíl, and in the surrounding waters.</p>	<p>An increase in tours around Sceilg Mhichíl as an alternative to landing, will help reduce some of the pressure to the island from visitor footfall. However, increased numbers and frequencies of vessels circumnavigating the Skelligs have the potential to impact wildlife. This action could be achieved through a public awareness campaign to make the boat operators and public aware of activities which could disturb wildlife such as seals and rafting birds. This information could be displayed at the piers.</p>

Glossary

Appropriate Assessment

The obligation to undertake Appropriate Assessment (AA) derives from Article 6(3) and 6(4) of the European Habitats Directive 92/43/EEC. AA is a focused and detailed impact assessment of the implications of a strategic action (such as a plan or programme) or project, alone and in combination with other strategic actions and projects, on the integrity of a European Site (Special Areas of Conservation or Special Protection Areas) in view of its conservation objectives.

Competent Authority

Competent Authority refers to the plan-making body undertaking the environmental assessment.

Effect

A change resulting from the implementation of a plan, programme or project.

Environmental Impact Assessment

The process of examining the anticipated environmental effects of a proposed project – from consideration of environmental aspects at design stage, through consultation and preparation of an Environmental Impact Assessment Report (EIAR), evaluation of the EIAR by a competent authority, and the subsequent decision as to whether the project should be permitted to proceed, encompassing public response to that decision.

Environmental Problems

Environmental problems arise where there is a conflict between current environmental conditions and ideal targets. If environmental problems are identified at the outset they can help focus attention on important issues and geographical areas where environmental effects of the plan or programme may be likely.

Likely Effect

The effect that is specifically predicted to take place – based on an understanding of the interaction of the proposed plan, programme or project and the receiving environment.

Mitigate

To make or become less severe or harsh.

Mitigation Measures

Measures designed to avoid, prevent or reduce effects. These measures can mitigate effects by: avoidance, when no effect is caused (often through consideration of alternatives); prevention, when a potential effect is prevented by a measure to avoid the possibility of the effect occurring; and/or reduction, when an effect is lessened.

Potential Effect

The effect that would occur without mitigation.

Pathway

The route by which an effect is conveyed between a source and a receptor.

Receptor

Any element in the environment which is subject to effects.

Residual Effect

The final predicted effect remaining after mitigation.

Scoping

The process of determining what issues are to be addressed and setting out a methodology in which to address them in a structured manner appropriate to the plan or programme. Scoping is carried out in consultation with appropriate environmental authorities.

Screening

The process of determining whether SEA is required to be undertaken for certain plans and programmes.

Strategic Environmental Assessment (SEA)

The assessment of the effects of certain plans and programmes on the environment. It presents a structured and participative process containing a set of tools to assist in the integration of environmental considerations and promote informed decision-making at plan/programme level.

Statutory environmental authority

The SEA Regulations (as amended) specify which environmental authorities need to be consulted at different stages of the SEA Process.

SEA framework

An SEA framework can comprise:

- a simple list of topics or themes that will be considered during the assessment;
- strategic environmental objectives that state the direction in which the plan should be going. These may be developed from policies that generally govern environmental protection objectives established at international, Community or Member State level;
- indicators that measure the effects that the plan is likely to have;
- targets that the plan should achieve;
- responses to any problems identified through monitoring.

Source

The activity or place from which an effect originates.

References

- CAAS for Fáilte Ireland (2020) Visitor Management Guidelines for the Wild Atlantic Way
- Clare County Council (2017a) SEA Environmental Report for Inis Cealtra Visitor Management and Sustainable Tourism Plan²¹
- Clare County Council (2017b) SEA statement for Inis Cealtra Visitor Management and Sustainable Tourism Plan
- Department of Housing, Local Government and Heritage (2022) Strategic Environmental Assessment: Guidelines for Regional Assemblies and Planning Authorities²²
- Environmental Protection Agency (2012) Review of SEA Effectiveness in Ireland (2012)²³
- Environmental Protection Agency (2015) Developing and Assessing Alternatives in Strategic Environmental Assessment²⁴
- Environmental Protection Agency (2019) Environmental Sensitivity Mapping (ESM) – User Manual²⁵
- Environmental Protection Agency (2019b) Good Practice Note on Strategic Environmental Assessment for the Forestry Sector²⁶
- Environmental Protection Agency (2020a) Good Practice Guidance on Cumulative Effects Assessment in Strategic Environmental Assessment²⁷
- Environmental Protection Agency (2020b) Good Practice Guidance on SEA Statements and Monitoring²⁸
- Environmental Protection Agency (2020c) NEAR Health, 2020. Nature and Environment to Attain and Restore Health Toolkit. Environmental Protection Agency, Johnstown Castle, Ireland.²⁹
- Environmental Protection Agency (2021a) Good Practice Guidance on SEA Screening³⁰

21 <https://www.clarecoco.ie/services/planning/publications/inishcealtra/inish-cealtra-volume-1-visitor-management-and-sustainable-tourism-development-plan-26763.pdf>

22 <https://www.gov.ie/en/publication/7e1aa-strategic-environmental-assessment-guidelines-for-regional-assemblies-and-planning-authorities/>

23 <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/SEA-EFFECTIVENESS-REVIEW-MAIN-REPORT-2012.pdf>

24 https://www.epa.ie/publications/research/biodiversity/EPA-157_web.pdf

25 <https://www.epa.ie/pubs/advice/ea/ESM%20User%20Manual.pdf>

26 https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/EPA_GoodPractice_SEA_ForestrySector.pdf

27 <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/EPA-Good-Practice-Guidelines-SEA.pdf>

28 <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf>

29 <https://www.epa.ie/publications/research/environment--health/JS---NEAR-Toolkit-FINAL-V1.6-1Oct20.pdf>

30 https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/SEA_Screening_GoodPractice_2021.pdf

Environmental Protection Agency (2021b) Guidance on Strategic Environmental Assessment – Environmental Impact Assessment Tiering³¹

Environmental Protection Agency (2021c) Good Practice Note on SEA for the Energy Sector³²

Environmental Protection Agency (2021d) SEA Pack³³

European Commission (2009) Study concerning the report on the application and effectiveness of the SEA Directive (2001/42/EC)³⁴

Fáilte Ireland (2015) SEA Environmental Report for the Wild Atlantic Way Operational Programme 2015–2019³⁵

Fáilte Ireland (2019a) Visitor Observation Study Results – Environmental Surveying and Monitoring of the Wild Atlantic Way Operational Programme³⁶

Fáilte Ireland (2020a) AA Natura Impact Statement for the Burren and Cliffs of Moher Visitor Experience Development Plan 2020–2025³⁷

Fáilte Ireland (2020b) SEA Environmental Report for the Dingle Visitor Experience Development Plan³⁸

Fáilte Ireland (2020c) SEA Environmental Report for the West Cork Coast Destination Experience Development Plan 2020–2025³⁹

Fáilte Ireland (2021a) SEA Environmental Report for the Clew Bay Destination Experience Development Plan 2021–2026⁴⁰

Fáilte Ireland (2021b) SEA Environmental Report for the Three Peninsulas West Cork and Kerry Visitor Experience Development Plan⁴¹

Fáilte Ireland (2022a) Killarney Destination Experience Development Plan 2022⁴²

31 https://www.epa.ie/publications/research/epa-research-2030-reports/Research_Report_392.pdf

32 <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/good-practice-note-on-sea-for-the-energy-sector.php>

33 <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/SEA-Pack-2022.pdf>

34 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52009DC0469&from=EN>

35 https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/2_Develop_Your_Business/Key%20Projects/Strategic-Environmental-Assessment-Environmental-Report_1.pdf

36 https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/4_Corporate_Documents/Strategy_Operations_Plans/Visitor-Observation-Report-2019.pdf

37 https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/2_Develop_Your_Business/Key%20Projects/Burren-and-Cliffs-of-Moher-VEDP-AA-NIS.pdf

38 <https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/Wild%20Atlantic%20Way/Final-Dingle-VEDP-SEA-ER.pdf>

39 <https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/Wild%20Atlantic%20Way/west-cork-sea-environment-report.pdf>

40 <https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/Wild%20Atlantic%20Way/Clew-Bay-DEDP-SEA-Environmental-Report.pdf>

41 <https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/Wild%20Atlantic%20Way/Clew-Bay-DEDP-SEA-Environmental-Report.pdf>

42 <https://online.flippingbook.com/view/730290738/>

Fáilte Ireland (2022b) SEA Environmental Report for the Ireland's Ancient East Regional Tourism Strategy⁴³

Fáilte Ireland (2022c) SEA Environmental Report for Ireland's Hidden Heartlands Regional Tourism Strategy⁴⁴

Fáilte Ireland (2022d) SEA Environmental Report for the Wild Atlantic Way Regional Tourism Strategy⁴⁵

IAIA (2002) SEA Performance Criteria. Special Publications Series No.1, International Association of Impact Assessment, Fargo, ND.

National Monuments Service (2021a) SEA Environmental Report for the Scelig Mhichíl World Heritage Property Management Plan 2020–2030⁴⁶

National Monuments Service (2021b) SEA Statement for the Scelig Mhichíl World Heritage Property Management Plan 2020–2030⁴⁷

Scottish Environment Protection Agency (2011) The Scottish SEA Review⁴⁸

Tipperary County Council (2020a) Lough Derg Destination Development Plan 2020–2024⁴⁹

Tipperary County Council (2020b) SEA Environmental Report for Lough Derg Destination Development Plan 2020–2024⁵⁰

Waterways Ireland (2020a) SEA Environmental Report for the Tourism Masterplan for the Shannon Region⁵¹

Waterways Ireland (2020b) SEA Statement for the Tourism Masterplan for the Shannon Region⁵²

Young, Arthur (1897) *A Tour in Ireland, 1776–1779* (London: Cassell)

43 [https://www.failteireland.ie/Failtelreland/media/WebsiteStructure/Documents/Irelands%20Ancient%20East/Draft-IAE-Strategy-SEA-Environmental-Report-\(1\).pdf](https://www.failteireland.ie/Failtelreland/media/WebsiteStructure/Documents/Irelands%20Ancient%20East/Draft-IAE-Strategy-SEA-Environmental-Report-(1).pdf)

44 [https://www.failteireland.ie/Failtelreland/media/WebsiteStructure/Documents/Ireland's%20Hidden%20Heartlands/Draft-IHH-Strategy-SEA-Environmental-Report-\(3\).pdf](https://www.failteireland.ie/Failtelreland/media/WebsiteStructure/Documents/Ireland's%20Hidden%20Heartlands/Draft-IHH-Strategy-SEA-Environmental-Report-(3).pdf)

45 <https://www.failteireland.ie/Failtelreland/media/WebsiteStructure/Documents/Wild%20Atlantic%20Way/Draft-WAW-Strategy-SEA-Environmental-Report.pdf>

46 <https://worldheritageireland.ie/wp-content/uploads/2022/08/SMMP-Draft-SEA-Environmental-Report.pdf>

47 https://worldheritageireland.ie/wp-content/uploads/2022/06/P2349_R5366_Rev0_SEA_Statement.pdf

48 https://www.sepa.org.uk/media/27555/sea-review-_main-report_july2011.pdf

49 https://www.tipperarycoco.ie/sites/default/files/2022-07/Lough%20Derg_Action%20Plan%202020_Final%2016%20Dec%202020.pdf

50 https://www.tipperarycoco.ie/sites/default/files/2022-07/Lough%20Derg_Action%20Plan%202020_Final%2016%20Dec%202020.pdf

51 <https://www.waterwaysireland.org/Documents/Consultations/Shannon%20Tourism%20Masterplan%20SEA%20Environmental%20Report.pdf>

52 <https://niopa.qub.ac.uk/bitstream/NIOPA/12237/1/Shannon%20Tourism%20Masterplan%20SEA%20Statement.pdf>



Environmental Protection Agency
An Ghníomhaireacht um Chaomhnú Comhshaoil

Headquarters

**PO Box 3000,
Johnstown Castle Estate
County Wexford, Ireland**

T: +353 53 916 0600

F: +353 53 916 0699

E: info@epa.ie

W: www.epa.ie

LoCall: 1890 33 55 99

Regional Inspectorate

McCumiskey House,
Richview, Clonskeagh Road,
Dublin 14, Ireland

T: +353 1 268 0100

F: +353 1 268 0199

Regional Inspectorate

Inniscarra, County Cork,
Ireland

T: +353 21 487 5540

F: +353 21 487 5545

Regional Inspectorate

Seville Lodge, Callan Road,
Kilkenny, Ireland

T +353 56 779 6700

F +353 56 779 6798

Regional Inspectorate

John Moore Road, Castlebar
County Mayo, Ireland

T +353 94 904 8400

F +353 94 902 1934

Regional Inspectorate

The Glen, Monaghan, Ireland

T +353 47 77600

F +353 47 84987

Regional Offices

The Civic Centre
Church St., Athlone
Co. Westmeath, Ireland
T +353 906 475722

Room 3, Raheen Conference Centre,
Pearse House, Pearse Road
Raheen Business Park, Limerick,
Ireland
T +353 61 224764

