

SEA STATEMENT

FOR THE

DUBLIN REGIONAL TOURISM DEVELOPMENT STRATEGY 2023-2027

STRATEGIC ENVIRONMENTAL ASSESSMENT

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Section 1 Introduction

1.1 Introduction and Legislative Context

This is the Strategic Environmental Assessment (SEA) Environmental Report for the Dublin Regional Tourism Development Strategy 2023-2027 (hereafter referred to as 'the Strategy'). It has been undertaken by CAAS Ltd. on behalf of Fáilte Ireland.

SEA is a systematic process of predicting and evaluating the likely significant environmental effects of implementing a proposed plan or programme, in order to ensure that these effects are adequately addressed at the earliest appropriate stages of decision-making in tandem with economic, social and other considerations.

Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27th June 2001, on the Assessment of the Effects of Certain Plans and Programmes on the Environment, referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including tourism.

The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (S.I. No. 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004). Both sets of Regulations became operational on 21st July 2004. The Regulations have been amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (S.I. No. 200 of 2011) and the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (S.I. No. 201 of 2011).

1.2 Content of the SEA Statement

Where SEA is undertaken, the Regulations require that "information on the decision" is made available to the public and the competent environmental authorities after the finalisation of the Strategy (referred to as an SEA Statement).

The SEA Statement is required to include information summarising:

- How environmental considerations have been integrated into the Strategy, highlighting the main changes to the Strategy that resulted from the SEA process;
- How the SEA Environmental Report and consultations have been taken into account, summarising the key issues raised in consultations and in the Environmental Report indicating what action was taken in response;
- The reasons for choosing the Strategy in the light of the other alternatives, identifying the other alternatives considered, commenting on their potential effects and explaining why the Strategy as adopted was selected; and
- The measures decided upon to monitor the significant environmental effects of implementing of the Strategy.

1.3 Implications for the Strategy

Article 3 para. 2 of the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes, or modifications to these:

- a) which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use and which set the framework for future development consent of projects listed in Annexes I and II to the EIA Directive¹, or
- b) which, in view of the likely effect on sites, have been determined to require

¹ Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011, on the assessment of the effects of certain public and private projects on the environment (codification)

an assessment pursuant to Article 6 or 7 of the Habitats Directive² i.e., the Directive requires that SEA is undertaken where Stage 2 Appropriate Assessment (AA)³ is being undertaken on plans, programmes etc.

The tourism sector Strategy does not contribute towards the framework for future development consent of projects listed in Annexes I and II to the EIA Directive and does not contain provisions or define rules that must be complied with when administrative consent of other projects is being granted.

The Strategy does, however, fall under the definition of a "plan" contained within the Birds and Natural Habitats Regulations 2011 (as amended) and therefore must be screened for the need to undertake AA. The Screening for AA has found that the Strategy has the potential, if unmitigated, to affect the ecological integrity of European sites and that measures to ensure that potential effects are avoided are required. Taking into account the requirements of the Habitats Directive and recent case law (including, European Court of Justice Judgement C323-17), Stage 2 AA was therefore carried out for the Strategy. As Stage 2 AA was undertaken on the Strategy, SEA was also undertaken -see requirement at b) above.

SEA identifies the likely significant environmental effects of implementing the Strategy. This SEA Environmental Report provides the findings of the SEA and should be read in conjunction with the Strategy. The findings of the SEA are expressed in this Environmental Report, an earlier version of which accompanied the Draft Strategy on public display and has been updated following consultation, and identifies how environmental considerations were integrated into the Strategy and how alternatives for the Strategy were considered.

² Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora

³ AA is provided for by the Habitats Directive and is a focused and detailed impact assessment of the implications of a strategic action or project, alone and in combination with other strategic actions and projects, on the integrity of a European site in view of its conservation objectives.

Section 2 How Environmental Considerations were integrated into the Strategy

2.1 Introduction

Environmental considerations were integrated into the Plan through:

1. Establishing the status of the Strategy and its interrelationship with the Statutory Decision-Making and Consent-Granting Framework;
2. Consultations;
3. Consideration of alternatives;
4. Communication of environmental sensitivities throughout the SEA process;
5. Integrating Requirements for Environmental Protection and Management into the Strategy.

2.2 Establishing the status of the Strategy and its interrelationship with the Statutory Decision-Making and Consent-Granting Framework

The SEA team worked with the Strategy-preparation team at Fáilte Ireland in order to help establish the status of the Strategy and its interrelationship with the Statutory Decision-Making and Consent-Granting Framework.

Implementing the Strategy 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 Strategy does not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent.**

The Strategy is 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. have been subject to their own environmental assessment processes, as relevant, and form the decision-making and consent-granting framework.

The National Planning Framework (NPF) sets out Ireland's planning policy direction up to 2040. The NPF is being implemented through Regional Spatial and Economic Strategies (RSEs) and lower tier Development Plans and Local Area Plans. The RSEs set out various objectives relating tourism development and activities that have been subject to environmental assessment. The RSEs have informed, and continue to inform, the preparation of lower-tier Development Plans and Local Area Plans, which also set out various objectives relating tourism development and activities that have been subject to environmental assessment.

Implementation of the Strategy shall be consistent with and conform with the NPF, 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 the Strategy (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 Strategy is not part and does not contribute towards.

2.3 Consultations

Relevant environmental authorities identified under the European Communities (Environmental Assessment of Certain Plans and Programmes), as amended, were sent SEA scoping notices by Fáilte Ireland indicating that submissions or observations in relation to the scope and level of detail of the information to be

included in the environmental report could be made.

Further detail on submissions made on foot of the SEA scoping notice is provided under Section 3.2.

Furthermore, submissions were made on the Draft Strategy and SEA Environmental Report while they were on public display and these resulted in updates being made to the SEA documents (see Section 3.3).

2.4 Consideration of alternatives

As part of the Strategy-preparation/SEA process, Fáilte Ireland considered three alternatives for the Strategy. Taking into account, inter alia, the environmental effects identified by the SEA, Fáilte Ireland proceeded with one of the alternatives (see Section 4 of this SEA Statement).

2.5 Communication of environmental sensitivities throughout the SEA process

2.5.1 Individual Environmental Sensitivities

Environmental considerations were integrated into the Draft Strategy before it was placed on public display. Individual sensitivities which were mapped by the SEA and considered by the Team preparing the Strategy included the following:

- European sites
- Other ecological designations
- Population density
- Geological heritage
- Landslide susceptibility and previous landslide events
- WFD surface waterbodies status
- WFD Register of Protected Areas
- Potential land cover mapping
- Infrastructure capacity
- Green infrastructure and ecosystem services
- Archaeological and architectural heritage
- Landscape designations
- Potential water sensitivity
- Overall potential environmental sensitivity
- Overall potential environmental opportunities

2.5.2 Appropriate Assessment

Stage 2 Appropriate Assessment (AA) has been undertaken alongside preparation of the Strategy. The requirement for AA is provided under the EU Habitats Directive (Directive 1992/43/EEC).

The conclusion of the AA is that the Strategy will not affect the integrity of the European sites, alone or in combination with other plans or projects.⁴

The preparation of the Strategy, SEA and AA has taken place concurrently and the findings of the AA have informed the SEA. Various content has been integrated into the Strategy through the SEA and AA processes.

2.6 Integrating Requirements for Environmental Protection and Management into the Strategy⁵

The SEA and AA team worked with the Strategy-preparation team at Fáilte Ireland in order to integrate requirements for environmental protection and management into the Strategy.

The Strategy provides a new context for how all existing and future tourism projects and initiatives are planned, developed and managed in a sustainable and integrated manner. The VICE (Visitor, Industry, Community and Environment) Model for Sustainable Tourism is the framework that has guided the content of the Strategy.

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 Strategy does not guarantee funding. While funding is provided to

⁴ Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the plan to proceed; and c) Adequate compensatory measures in place.

⁵ These requirements include those that have arisen through the SEA and/or AA processes.

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 compliance⁶ with measures relating to sustainable development, environmental protection and environmental management contained within the following Fáilte Ireland published documents, where available:

- Site Maintenance Guidelines (appended to the SEA ER and to the Strategy);
- Visitor Management Guidelines (appended to the SEA ER and to the Strategy);
- Environmental Management for Local Authorities and Others (appended to this SEA ER and to the Strategy);
- Environmental Damage Resolution (appended to the SEA ER and to the Strategy);
- Greenway Visitor Experience & Interpretation Toolkit (appended to the SEA ER and to the Strategy);
- Environmentally Responsible Tourism Promotion & Campaign Statement (appended to the SEA ER and to the Strategy);
- Blueway Management & Development Guide (appended to the SEA ER and to the Strategy) and
- Sustainable Recreational Trail Development & Operation (in preparation).

Even where Fáilte Ireland is not the entity funding a project or controlling the funding for a project, it will seek to ensure the integration of sustainable tourism development into all of its activities and strategic partnerships. This will include taking into account the various mitigation measures integrated into the Strategy that are described in this section of the SEA Environmental Report.

In order to be realised, projects included in the Strategy (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 Strategy is not part and does not contribute towards. Such

⁶ Demonstration of compliance may be supported by monitoring undertaken by the beneficiary.

legislation, policies, plans and programmes include:

- Requirements for lower-tier environmental assessment, including EIA and AA;
- Relevant land use plans (including the Regional Spatial and Economic Strategies and lower-tier Development Plans and Local Area Plans) and other sectoral plans that form part of the statutory decision-making and consent-granting framework, including various provisions relating to sustainable development, environmental protection and environmental management⁷; and
- The most up-to-date Climate Action Plan, National Climate Change Adaptation Framework and National Mitigation Plan⁸.

Examples of key requirements that have been highlighted by environmental authorities and which Fáilte Ireland has integrated into the Strategy through the SEA/AA/Strategy preparation processes are included on the table below.

⁷ For more information, please refer to Appendix II of the SEA Environmental Report on the website of the relevant public authority.

⁸ For more information, please refer to Section 4.10 and/or Appendix II of the SEA Environmental Report or the website of the relevant public authority.

Table 2.1 Examples of Key Requirements that have been integrated into the Strategy, including its Appendices⁹

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. This consideration and associated mitigation shall take into account the need to provide for climate resilience. • Close collaboration will also be undertaken with the relevant stakeholders, such as Local Authorities and Irish Water, to ensure that any proposed tourism developments align with the capacity of the supporting critical service infrastructure. • Fáilte Ireland will encourage site owners and operators to consider environmentally sustainable solutions and ensure compliance with the Water Framework Directive.¹⁰
Visitor Management	<ul style="list-style-type: none"> • In contributing towards outcomes under the Strategy, 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 Strategy, as relevant and appropriate. • Visitor management strategies will be required for proposed plans, programmes and projects that are to receive funding 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.
Environmental Damage 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 Strategy is not envisaged as being likely to directly result in any such instances of environmental perturbation, it forms part of a hierarchy of tourism initiatives, including lower-tier DEDPs, and the wider Statutory planning framework. The Environmental Damage Resolution procedure provides for a consistent approach in responding to such issues and is available for integration at DEDP and site-specific levels.
Environmentally Responsible Tourism Promotion & Campaign Statement	<ul style="list-style-type: none"> • Environmental considerations will be integrated into promotional processes and environmentally responsible tourism campaigns will be required. Such campaigns will garner environmental stewardship that will help to ensure environmental protection and management. Promotional processes will 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.
Climate Action	<ul style="list-style-type: none"> • Comply with the most up-to-date Climate Action Plan, National Climate Change Adaptation Framework and National Mitigation Plan, including contributing towards efforts to decarbonize the tourism sector, improve low carbon travel, such as walking and cycling, and the circular economy. • Various actions under the Climate Action Plan are relevant to Fáilte Ireland as a Lead or Key Stakeholder (No. 31, 47, 88, 89, 90, 97, 98, 178, 179 and 232)¹¹. • Fáilte Ireland's 2023 Corporate Strategy will identify progress in relation to these actions and the meeting of national and sectoral commitments relating to emission targets.

⁹ including "Environmental Management for Local Authorities and Others"

¹⁰ In addition to contributing towards compliance with the Water Framework Directive, implementation of the Strategy will be undertaken in compliance with the Marine Strategy Framework Directive, including on issues such as marine litter where they may arise.

¹¹ Climate Action Plan 2021

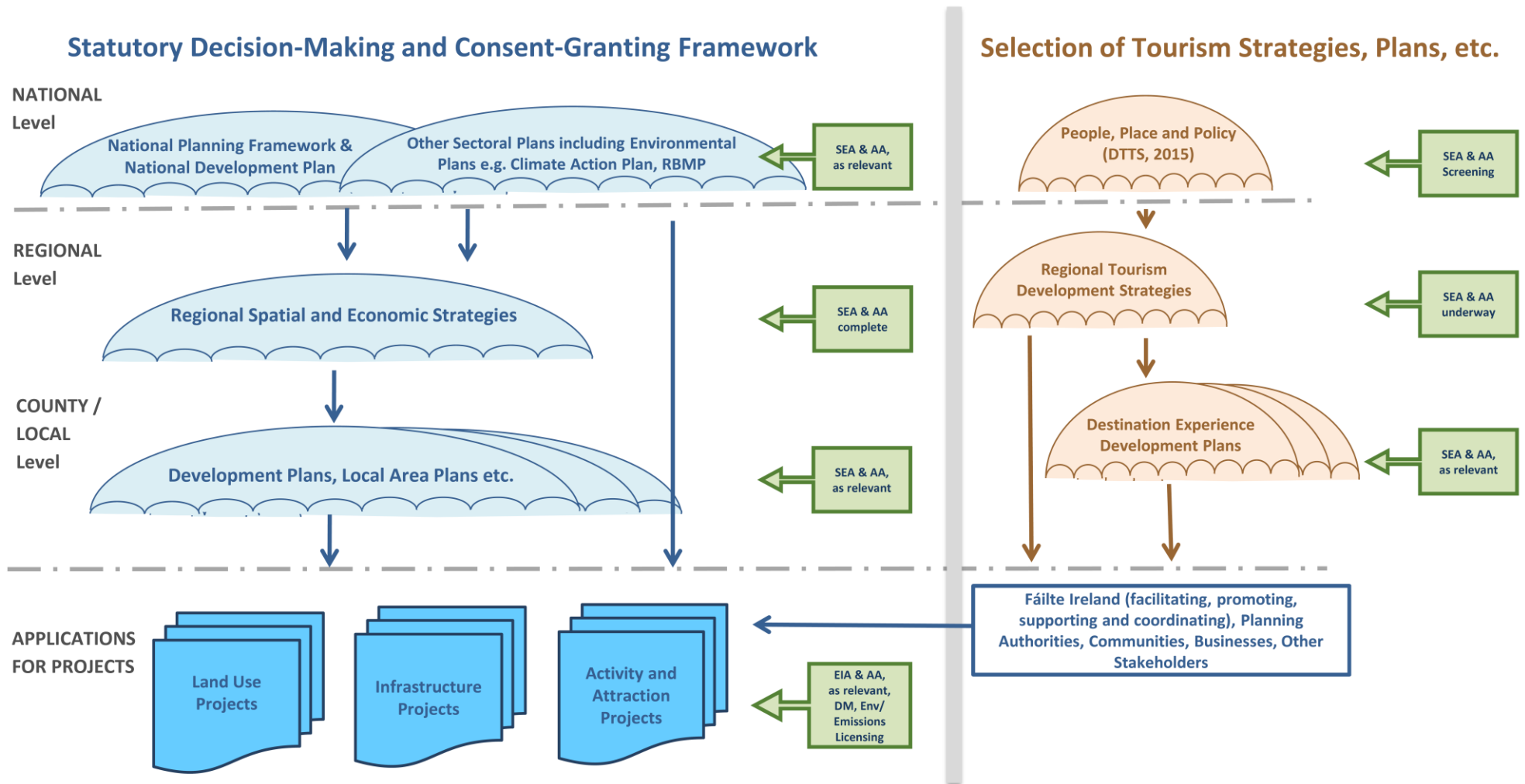


Figure 2.1 Statutory Decision-Making and Consent-Granting Framework, Tourism Plans Regional Tourism Development Strategies and Environmental Assessment Requirements

Section 3 Environmental Report and Submissions/ Observations

3.1 Introduction

This section details how both the Environmental Report and submissions and observations made to Fáilte Ireland on the Environmental Report and SEA process have been taken into account during the preparation of the Strategy and the SEA.

3.2 SEA Scoping Submissions

Relevant environmental authorities¹² identified under the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations, as amended, were sent SEA scoping notices by Fáilte Ireland indicating that submissions or observations in relation to the scope and level of detail of the information to be included in the environmental report could be made to Fáilte Ireland. Furthermore, Northern Ireland Department for Communities and Department of Agriculture, Environment and Rural Affairs also made submissions during the scoping process. Submissions were made by all environmental authorities consulted with and these have been taken into account in undertaking the assessments and preparing the Draft Strategy. Refer to Appendix I for more detail on the content of these submissions and how these submissions have been taken into account during the preparation of the Strategy and the SEA process.

As the Strategy is not likely to have significant effects on the environment in another Member State, transboundary consultations as provided for by Article 7 of the SEA Directive are not required. Notwithstanding this, Northern Ireland Department for Communities and Department of Agriculture, Environment and Rural Affairs have been consulted with during scoping and have

¹² The following authorities were notified: Environmental Protection Agency; Department of Environment, Climate and Communications; Department of Agriculture, Food and the Marine; and Department of Housing, Local Government and Heritage.

been given an opportunity to enter consultations on the Strategy.¹³

3.3 Submissions on the Environmental Report and Draft Strategy

Various submissions were made on the Draft Strategy and/or associated environmental assessment documents while these documents were on public display.

Updates to the SEA and AA documents did not materially change the Strategy and consequently did not necessitate further, detailed SEA consideration.

Updates to the Draft Strategy did not provide for any uses, works or activities additional to those already provided for by the original Draft Strategy that would present additional sources.

¹³ 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 in 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, co-operation 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.

Where there is potential for a likely significant environmental effect on Northern Ireland at project level, Fáilte Ireland will seek to ensure that appropriate consultations with the relevant bodies are undertaken, including through existing systems and methods as normal, and that all legislation is complied with in this regard.

Consequently, they did not require further, detailed SEA or AA consideration.

Additional text/non-material changes added to the Strategy on foot of submissions includes the following:

- **Add the following sentence to page 75 of the Strategy cross-referencing to SEA and AA documents for details of biodiversity considerations taken into account in the SEA/AA and Strategy preparation process:**

"The SEA and AA documents provide a comprehensive description of the environmental baseline including natural heritage, ecosystem services, designated sites and protected species within and beyond the Strategy area. The findings of SEA and AA should be read in conjunction with the Strategy."

- **Insert the following reference to 'Green Procurement Procedure' on page 75 the Strategy (new text in bold):**

*"In order to be realised, projects included in this strategy (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, **green procurement procedures** as appropriate)."*

The SEA Environmental Report was updated with the following on foot of submissions:

- **Add an additional bullet point in Section 4.14.2 SEA ER: "Seascapes".**
- **Add an additional footnote at the end of the last paragraph in Section 4.14.2 in SEA Environmental Report:**

"The Regional Seascape Character Assessment Final Report will be available for consideration in any tourism-related infrastructure considerations in coastal areas, where relevant."

- **Insert the following text into Section 10 "Monitoring Measures" of the SEA Environmental Report:**

"The EPA's Guidance on SEA Monitoring has informed the preparation of the Monitoring Programme. Results of the Monitoring Programme should inform any review of the Strategy, as relevant."

- **Update the targets on Table 10.1 in SEA Environmental Report as follows (new text in bold):**

- *"Require all lower-tier Fáilte Ireland plans to include ecosystem services and green/blue*

*infrastructure provisions and, as a minimum, to **comply as relevant with** ~~have regard to~~ the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species."*

- *"Require all lower-tier Fáilte Ireland plans to include ecosystem services and green/blue infrastructure provisions and, as a minimum, to **comply as relevant with** ~~have regard to~~ the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species."*

- **Replace references to NIEA in relation to the Historic Monuments and Archaeological Objects (NI) Order 1995 with Department for Communities (DfC) Historic Environment Division (HED), where relevant in SEA Environmental Report Appendix III.**

- **Add a footnote at the end of paragraph in Section 4.13.2 in SEA Environmental Report:**

"With regard to 'designated' heritage assets, only a small percentage of recorded industrial and defence heritage assets are formally designated, but as assets of local importance, are afforded protection through relevant regional and local planning policy."

- **Add the following sentence under Section 4.12 "Cultural Heritage" of the SEA Environmental Report:**

"There are various intangible aspects of cultural heritage, i.e., folklore, customs, beliefs, traditions and local knowledge, which are associated with tangible aspects of cultural heritage, such as those sites and structures designated for protection."

- **Add the following text as a footnote to the text at the end of Section 3.4 "Scoping" in the SEA Environmental Report:**

"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 in 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, co-operation 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.

Where there is potential for a likely significant environmental effect on Northern Ireland at project level, Fáilte Ireland will seek to ensure that appropriate consultations with the relevant bodies are undertaken, including through existing systems and methods as normal, and that all legislation is complied with in this regard."

- **Add the following text in Section 9 "Mitigation Measures" of the SEA Environmental Report:**

"Where there is potential for a likely significant environmental effect on Northern Ireland at project level, Fáilte Ireland will seek to ensure that appropriate consultations with the relevant bodies are undertaken, including through existing systems and methods as normal, and that all legislation is complied with in this regard."

- **Add the following text to Section 9 "Mitigation Measures" of the SEA Environmental Report:**

"In addition to contributing towards compliance with the Water Framework Directive, implementation of the Strategy will be undertaken in compliance with the Marine Strategy Framework Directive, including on issues such as marine litter where they may arise."

- **Identify on Table 8.4 in SEA Environmental Report ("Potential for Interrelationships between Environmental Components") that there is a potential interaction between 'Cultural Heritage' and 'Biodiversity, Flora and Fauna'.**
- **Add the following footnote in the SEA Environmental Report to the 'Potential Significant Adverse Effects, if unmitigated' associated with biodiversity and flora and fauna:**

"This includes potential impacts from recreational disturbance (including from dog walking) that can lead to the avoidance of certain areas by birds (including ground-nesting species), which can then impact on breeding success and survival.

This also includes potential impacts on overwintering wildfowl and waders arising from the seasonal use of Dublin Bay and also inland sites. Key tourism sites such as Phoenix Park, St Anne's Park, Bull Island and other public open spaces used for tourism and recreation are also important feeding and roosting sites for a range of species. Several of these bird species, particularly light-bellied Brent geese, oystercatcher and bar-tailed godwit are special conservation interests for the purposes behind the designation of areas on Dublin Bay as Special Protection Areas."

In addition, all recommended references to legislation, policies and plans, as well as reports and publications cited in SEA Environmental Report have been added/or updated, where relevant.

3.4 SEA documents including the SEA Environmental Report

The Draft Strategy and accompanying documents (including SEA Environmental Report and AA Natura Impact Statement) were placed on public display, having integrated all recommendations arising from the SEA and AA processes.

The SEA Environmental Report was updated in order to take account of non-material changes to the Draft Strategy that were made on foot of submissions.

Fáilte Ireland have taken into account the findings of all relevant SEA output during their consideration of the Draft Strategy and before the Strategy was adopted.

Section 4 Reasons for choosing the selected alternative in light of other alternatives considered

As per the requirements of the SEA Directive, this SEA considers reasonable alternatives, which are capable of being implemented for the Strategy, taking into account the objectives and the geographical scope of the Strategy.

4.1 Description of Alternatives

Current Situation (Alternative 1: Business as Usual)

Dublin is the key access point for the island of Ireland and as such it is often the first and/or last experience visitors have of the country. Its traditionally strong air access has also made it the key city break destination in Ireland. Indeed, for many overseas consumers, it is their only experience of Ireland. This strong access, combined with good conference facilities, has also seen Dublin enjoy sustained growth in the high value Meetings, Incentive, Conference and Events (MICE) business. Equally, the city's sporting and events infrastructure enables it to attract many domestic visitors. Not surprisingly therefore, the tourism economy and associated visitor numbers for Dublin were impressive prior to COVID 19. Nationally Dublin accounts for over two thirds of all overseas tourists to Ireland. Tourism revenue pre pandemic was €2.6bn, over 80% of this coming from international tourists. Tourism is also important in terms of employment, with the industry supporting just under 70,000 jobs in 2019.

Forecasting is very difficult in the current economic environment as the global economy recovers from the impact of Brexit, Covid-19 and the Russian-Ukraine conflict. Given Ireland (and indeed Dublin's) high reliance on overseas tourists for earning, real recovery to pre-pandemic levels will only be possible when international tourism returns. The overseas market is likely to recover more slowly as connectivity returns, with demand back to 2019 levels by 2025 or 2026. In the early days of international travel re-opening, overseas tourists are more likely to return to the traditional destinations in Ireland first, before exploring the lesser-known areas, which means Dublin is well placed to benefit in the initial phase of the recovery.

There are various policies and plans that are already in place relating to the development of tourism, including:

- The Government's Tourism Strategy, People, Place and Policy: Growing Tourism to 2025;
- Fáilte Ireland's Corporate Strategy 2021-2023; and
- The wider statutory planning framework, including the National Planning Framework, the Regional Spatial and Economic Strategy and the various Development Plans and Local Area Plans in force across the country.

This current situation presents **Alternative 1 (Business as Usual)** to be considered by the SEA. Overtime, the numbers of visitors would be expected to restore to pre-pandemic levels under this scenario.

Prepare a Strategy (Alternatives 2A and 2B: Prepare a Strategy)

Alternatives 2A and 2B both involve preparing a Strategy that would seek to continue to evolve and activate a relevant and motivating City Destination that will attract both high-yield international and domestic visitors by effectively mobilising and aligning stakeholders behind a singular coherent vision and visitor experience offering that extends stay all year round.

The ten-year Vision for such a Strategy would see Dublin ranking in the top 3 of its competitive set (Amsterdam, Belfast, Berlin, Copenhagen, Edinburgh and Prague) with tourists choosing to visit because of its uniqueness as a vibrant city centre nestled between mountains and a UNESCO bay, and because it's a recognised global leader for sustainable business events. Both domestic and international tourists would be staying longer and spending more, enjoying experiences that surprise

and delight, from distinct “urban villages” across the city, each with a unique experience to offer, to an easily accessible mountain offering overlooking the city scape, and a bay peppered with characterful coastal villages, built heritage and water adventures. There would be lots to see and do, both day and night, with iconic attractions, best in class experiences, world class food, live music and events, internationally renowned festivals and unrivalled nightlife. Locals would be at the heart of the authentic visitor experience, as they share their stories and their city in an engaging and inherently Dublin way. Visitors would be able to navigate their way seamlessly across the region using ticketless public transport and wayfinding that is accessible in their own language.

Under the heading of Alternative 2 there are two separate alternatives:

Alternative 2A: A Strategy 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 including those relating to:

- Site Maintenance;
- Visitor Management;
- Environmental Management for Local Authorities and Others;
- Environmental Damage Resolution;
- Environmentally Responsible Tourism Promotion and Campaigns;
- Blueway Management and Development;
- Sustainable Recreational Trail Development and Operation;
- Infrastructure capacity; and
- Ecosystem services.

Alternative 2A would also integrate focus on visitor management, including the pursuit of value over volume and through lower-tier Destination and Experience Development Plans.

Alternative 2B: A Strategy 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.

4.2 Detailed Consideration of Alternatives

Alternative 1: Business as Usual

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 in SEA Environmental Report).

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 in SEA Environmental Report) would continue to be mitigated through that process.

In the absence of a Strategy, overtime, a restoration of tourist numbers back to pre-pandemic levels would be expected. An increase in visitors would increase potential adverse effects on all environmental components (arising from increased levels of land use development and activities).

Potential increases in travel related greenhouse gas and other emissions to air, including from aviation, would occur as a result of increases in visitors; however, emission reduction measures contained within the Climate Action Plan would be likely to increasing take effect, more so towards the end of the Strategy period (2027). The increase in visitors and associated emissions would be likely to be less under **Alternative 1**. Additional mitigatory provisions contained within the **Alternative 2A** Strategy, including those relating to low-carbon travel, such as walking and cycling, and the circular economy would not be provided for.

There would be one layer of mitigation under **Alternative 1**; the existing statutory planning and consent framework. 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 in SEA Environmental Report) would continue be mitigated through that process.

Alternatives 2A and 2B: Prepare a Strategy

Alternatives 2A 'A Strategy with Additional Requirements for Environmental Protection and Management' and **2B** 'A Strategy without Additional Requirements for Environmental Protection and Management' both involve preparing a Strategy that that would seek to continue to evolve and activate a relevant and motivating City Destination that will attract both high-yield international and domestic visitors by effectively mobilising and aligning stakeholders behind a singular coherent vision and visitor experience offering that extends stay all year round.

Therefore, **Alternatives 2A** and **2B** would be likely to result in a greater increase in tourism levels – and associated development and activity requirements and loadings – than would be the case under **Alternative 1** ('Business as Usual').

Under both **Alternatives 2A** and **2B**, 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 in SEA Environmental Report) would continue be mitigated through that process.

Potential increases in travel related greenhouse gas and other emissions to air, including from aviation, would occur as a result of increases in visitors; however, emission reduction measures contained within the Climate Action Plan would be likely to increasing take effect, more so towards the end of the Strategy period (2027). The increase in visitors and associated emissions would be likely to be more under **Alternatives 2A** and **2B** when compared with **Alternative 1**. The **Alternative 2A** Strategy would provide additional measures relating to emissions reduction, including those relating to low-carbon travel, such as walking and cycling, and the circular economy.

A Strategy would 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 this, there would be one layer of mitigation under **Alternative 2B**, through the existing statutory planning and consent framework. **Alternative 2A** would provide additional requirements for environmental protection and management, including those relating to:

- Site Maintenance;
- Visitor Management;
- Environmental Management for Local Authorities and Others;
- Environmental Damage Resolution;
- Environmentally Responsible Tourism Promotion and Campaigns;
- Blueway Management and Development;
- Sustainable Recreational Trail Development and Operation;
- Infrastructure capacity; and
- Ecosystem services.

Alternative 2A would also integrate focus on visitor management, including the pursuit of value over volume and through lower-tier Destination and Experience Development Plans.

4.3 Reasons for choosing the selected alternative in light of other alternatives considered

Taking into account the environmental effects detailed above and the strengths and potential present for tourism across the Dublin Region, Fáilte Ireland have proceeded with Alternative 2A "A Strategy with Additional Requirements for Environmental Protection and Management".

For more detail refer to SEA Environmental Report.

Section 5 Monitoring Measures

5.1 Introduction

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This section details the measures that have been selected in order to monitor the likely significant effects of implementing relevant Fáilte Ireland Plans, Programmes, etc.

The monitoring programme is flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It monitors all potential effects, including positive and negative ones (including cumulative effects – refer also to Section 7.3 in SEA Environmental Report). Monitoring can demonstrate the positive effects facilitated by the Strategy and can enable, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action.

The occurrence of persistent significant adverse environmental effects which are directly attributable to tourism would necessitate consideration of the effects in the context of the Strategy and a possible review of the part(s) of the Strategy.

5.2 Indicators and Targets

Monitoring is based around indicators that allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives identified in Section 5 in SEA Environmental Report and used in the evaluation. Each indicator to be monitored is accompanied by the target(s) that were identified with regard to the relevant strategic actions.

Given the relationship of the Tourism Strategy and lower-tier tourism related projects with the statutory decision-making and consent-granting framework (see Section 9.2 in SEA Environmental Report), the measures identified in RSES and lower tier Development Plan SEAs have been used – as they are or having been slightly modified – in many instances. This consistency across the

hierarchy of planning will improve the efficiency and effectiveness of future monitoring.

Table 5.1 overleaf shows the current indicators and targets that have been selected for monitoring the likely significant environmental effects of implementing relevant Fáilte Ireland Plans, Programmes, etc. These monitoring measures are updated on an ongoing basis.

Monitoring is an ongoing process and the programme allows for flexibility and further refinement of indicators and targets.

5.3 Sources

The Strategy is 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. have been subject to their own environmental assessment processes, as relevant, and form the decision-making and consent-granting framework. In implementing the Monitoring Programme Fáilte Ireland will take into account this hierarchy of planning and environmental monitoring. Furthermore, environmental monitoring for the strategy and other existing/future Fáilte Ireland plans, programmes, etc. may be undertaken and reported on at the same time.

Confirmation of compliance with relevant environmental measures (see Section 9 in SEA Environmental Report) will be a source of information for the Monitoring Programme. This documentation may include monitoring undertaken by beneficiaries to demonstrate compliance with the environmental requirements.

Other existing monitoring sources will be used, including:

- Information gathered through existing and new Fáilte Ireland environmental monitoring programmes (including the National Environmental Monitoring Programme 2021-2026) in order to monitor any effects of visitors

(see Section 4.6.2 in SEA Environmental Report);

- Sources maintained by local authorities within the Dublin Region (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; and
- Lower-tier environmental assessment and decision making – including a review of project approvals granted and associated documents – will also be utilised as part of the Monitoring Programme.

The EPA's Guidance on SEA Monitoring has informed the preparation of the Monitoring Programme. Results of the Monitoring Programme should inform any review of the Strategy, as relevant.

5.4 Reporting and Responsibility

Reporting on environmental monitoring will address the indicators set out below. Fáilte Ireland is responsible for the ongoing review of indicators and targets, collating existing relevant monitored data, the preparation of monitoring evaluation report(s), the publication of these reports and, if necessary, the carrying out of corrective action, in combination with the relevant authorities.

Environmental monitoring for the Strategy and other existing/future Fáilte Ireland plans, programmes, etc. may be undertaken and reported on at the same time. The findings of monitoring will be reported on periodically with frequencies to be determined during implementation.

Table 5.1 Selected Indicators, Targets and Monitoring Sources

Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action ¹⁴
Biodiversity, Flora and Fauna	BFF	<ul style="list-style-type: none"> Compliance of funding approvals with Strategy measures providing for the protection of biodiversity and flora and fauna – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy 	<ul style="list-style-type: none"> For funding only to be provided when applications demonstrate that they comply with all Plan measures providing for the protection of biodiversity and flora and fauna – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy 	<ul style="list-style-type: none"> Internal review of grants of funding, including compliance with Strategy’s mitigation – see Section 9 SEA ER Environmental assessment and decision making by local authorities SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) Input from any other existing, new or replacement Fáilte Ireland monitoring programmes DHLGH report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every 6 years)¹⁵ DHLGH National Birds Directive Monitoring Report for the under Article 12 (every 3 years)¹⁶ Consultations with the NPWS (see Section 10.4 SEA ER)¹⁷ Review of all lower-tier Fáilte Ireland plans For Water - see below 	<ul style="list-style-type: none"> Review internal systems and, if necessary, the Strategy Where impacts are identified these will be investigated as per the Environmental Damage Resolution procedure Environmentally Responsible Tourism Promotion and Campaign Procedure will be available to assist in remedial action, where relevant, at a future date For Water – see below
		<ul style="list-style-type: none"> Condition of European sites 	<ul style="list-style-type: none"> Implement the provisions of the Strategy providing for the protection and management of biodiversity and flora and fauna Require all lower-tier Fáilte Ireland plans to include ecosystem services and green/blue infrastructure provisions and, as a minimum, to comply as relevant with the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species 		
		<ul style="list-style-type: none"> Number of lower-tier Fáilte Ireland plans that have included ecosystem services content, mapping and policy to protect ecosystem services 	<ul style="list-style-type: none"> Require all lower-tier Fáilte Ireland plans to include ecosystem services and green/blue infrastructure provisions and, as a minimum, to comply as relevant with the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species 		
		<ul style="list-style-type: none"> SEAs and AAs as relevant for new Fáilte Ireland policies, plans, programmes etc. 	<ul style="list-style-type: none"> Screen for and undertake SEA and AA as relevant for new Fáilte Ireland policies, plans, programmes etc. 		
		<ul style="list-style-type: none"> Status of water quality in water bodies 	<ul style="list-style-type: none"> Included under Water below 		
Population	PHH	<ul style="list-style-type: none"> Compliance of funding approvals with 	<ul style="list-style-type: none"> For funding only to be provided when 	<ul style="list-style-type: none"> Internal review of grants of funding, including 	<ul style="list-style-type: none"> Review internal systems

¹⁴ The occurrence of persistent significant adverse environmental effects that are directly attributable to tourism would necessitate consideration of the effects in the context of the Strategy and a possible review of part(s) of the Strategy. Examples of where consultation with local authorities and others and the possible coordination of remedial action may be required include: complaints received from statutory consultees regarding avoidable impacts on any environmental components resulting from development which is funded under the Strategy; court cases taken by the Government Departments regarding impacts upon archaeological heritage from development which is granted permission under the Strategy; failure to meet bathing water Mandatory Values directly attributable to tourism; fish kills directly attributable to tourism; and boil notices on drinking water directly attributable to tourism.

¹⁵ Including confirmation with development management that the following impacts have been considered and including use of monitoring data, where available: biodiversity/habitat loss; nitrogen deposition impacts on Natura 2000 sites; recreational disturbance resulting from implementation of tourism and recreation policies and objectives particularly in riparian areas; biodiversity enhancement; and disturbance /visitor pressure impacts of recreation, amenity and tourism development.

¹⁶ Including confirmation with development management that the following impacts have been considered and including use of monitoring data, where available: biodiversity/habitat loss; nitrogen deposition impacts on Natura 2000 sites; recreational disturbance resulting from implementation of tourism and recreation policies and objectives particularly in riparian areas; biodiversity enhancement; and disturbance /visitor pressure impacts of recreation, amenity and tourism development.

¹⁷ Including confirmation with development management that the following impacts have been considered and including use of monitoring data, where available: biodiversity/habitat loss; nitrogen deposition impacts on Natura 2000 sites; recreational disturbance resulting implementation of tourism and recreation policies and objectives particularly in riparian areas; biodiversity enhancement; and disturbance /visitor pressure impacts of recreation, amenity and tourism development.

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Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action ¹⁴
and Human Health		Strategy measures providing for: the protection of population and human health; and the development of sustainable tourism, accompanied by public infrastructure and services – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy	applications demonstrate that they comply with all Strategy measures providing for: the protection of population and human health; and the development of sustainable tourism, accompanied by public infrastructure and services – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy	compliance with Strategy’s mitigation – see Section 9 SEA ER	and, if necessary, the Strategy
		<ul style="list-style-type: none"> Number of spatial concentrations of health problems arising from environmental factors resulting from development funded under the Strategy 	<ul style="list-style-type: none"> No spatial concentrations of health problems arising from environmental factors as a result of funding under the Strategy 	<ul style="list-style-type: none"> Environmental assessment and decision making by local authorities SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) Input from any other existing, new or replacement Fáilte Ireland monitoring programmes Consultations with the Health Service Executive and EPA 	
Soil (and Land)	S	Compliance of funding approvals with Strategy measures providing for the protection of soil – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy	For funding only to be provided when applications demonstrate that they comply with all Strategy measures providing for the protection of soil – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy	Internal review of grants of funding, including compliance with Strategy’s mitigation – see Section 9 SEA ER	<ul style="list-style-type: none"> Review internal systems and, if necessary, the Strategy Consultations with the EPA and review of internal systems Where impacts are identified these will be investigated as per the Environmental Damage Resolution procedure Environmentally Responsible Tourism Promotion and Campaign Procedure will be available to assist in remedial action, where relevant, at a future date
		Instances where contaminated material must be disposed of	Dispose of contaminated material in compliance with EPA guidance and waste management requirements	<ul style="list-style-type: none"> Environmental assessment and decision making by local authorities SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) Input from any other existing, new or replacement Fáilte Ireland monitoring programmes 	
		Percentage of designated geological sites protected from adverse effects resulting from development which is funded under the Strategy	Protect designated geological sites from adverse effects resulting from development which is funded under the Strategy		
Water	W	Compliance of funding approvals with Strategy measures providing for the protection of water – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy	For funding only to be provided when applications demonstrate that they comply with all Strategy measures providing for the protection of water – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy	Internal review of grants of funding, including compliance with Strategy’s mitigation – see Section 9 SEA ER	<ul style="list-style-type: none"> Review internal systems and, if necessary, the Strategy Where impacts are identified these will be investigated as per the Environmental Damage Resolution procedure Environmentally Responsible Tourism Promotion and Campaign Procedure will be available to assist in remedial action, where relevant, at a future date
		Status of water bodies as reported by the EPA Water Monitoring Programme for the WFD	<ul style="list-style-type: none"> Not to cause deterioration in the status of any surface water or affect the ability of any surface water to achieve ‘good status’ Implementation of the objectives of the River Basin Management Plan 	<ul style="list-style-type: none"> Environmental assessment and decision making by local authorities SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) Input from any other existing, new or replacement Fáilte Ireland monitoring programmes 	
		Number of incompatible developments funded within flood risk areas	Minimise developments funded on lands which pose - or are likely to pose in the future - a	<ul style="list-style-type: none"> EPA Monitoring Programme for WFD 	

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Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action ¹⁴
			significant flood risk	compliance	remedial action, where relevant, at a future date
Material Assets	MA	<ul style="list-style-type: none"> Compliance of funding approvals with Strategy measures providing for the protection of material assets – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy Programmed delivery of Irish Water infrastructure for all key growth towns in line with Irish Water Investment Plan and prioritisation programme to ensure sustainable growth can be accommodated Number of new developments funded which can be adequately and appropriately served with waste water treatment and drinking water Fulfilment of Climate Action Plan measures, including those related to energy, where Fáilte Ireland is Lead or Key Stakeholder 	<ul style="list-style-type: none"> For funding only to be provided when applications demonstrate that they comply with all Strategy measures providing for the protection of material assets – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy New developments funded to be connected to and adequately and appropriately served by waste water treatment over the lifetime of the Strategy Where individual on-site wastewater treatment systems are proposed, for developments only to be funded when applications demonstrate that the outfall from the individual on-site wastewater treatment system will not – in combination with other septic tanks – contribute towards any surface or ground water body not meeting the objective of good status under the Water Framework Directive Facilitate, as appropriate, Irish Water in developing water and wastewater infrastructure Maximise fulfilment of Climate Action Plan measures, including those related to energy, where Fáilte Ireland is Lead or Key Stakeholder Implement the provisions of the Strategy providing for the protection and management of material assets 	<ul style="list-style-type: none"> Internal review of grants of funding, including compliance with Strategy's mitigation – see Section 9 SEA ER Environmental assessment and decision making by local authorities SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) Input from any other existing, new or replacement Fáilte Ireland monitoring programmes Consultations with EPA and Irish Water Internal review of progress with Climate Action Plan measures Monitoring relating to energy use by tourists where available 	<ul style="list-style-type: none"> Review internal systems and, if necessary, the Strategy Where impacts are identified these will be investigated as per the Environmental Damage Resolution procedure Environmentally Responsible Tourism Promotion and Campaign Procedure will be available to assist in remedial action, where relevant, at a future date Environmentally Responsible Tourism Promotion and Campaign Procedure will be available to assist in remedial action, where relevant, at a future date
Air	A	<ul style="list-style-type: none"> Compliance of funding approvals with Strategy measures providing for the protection of air and noise – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy Fulfilment of Climate Action Plan measures where Fáilte Ireland is Lead or Key Stakeholder Proportion of journeys made by private fossil fuel-based car compared to 2016 National Travel Survey levels of 74% NO_x, SO_x, PM10 and PM2.5 as part of Ambient Air Quality Monitoring 	<ul style="list-style-type: none"> For funding only to be provided when applications demonstrate that they comply with all Strategy measures providing for the protection of air and noise – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy Maximise fulfilment of Climate Action Plan measures where Fáilte Ireland is Lead or Key Stakeholder Decrease in proportion of journeys made by private fossil fuel-based car compared to 2016 National Travel Survey levels Improvement in Air Quality trends, particularly in relation to transport related emissions of NO_x and particulate matter 	<ul style="list-style-type: none"> Internal review of grants of funding, including compliance with Strategy's mitigation – see Section 9 SEA ER Environmental assessment and decision making by local authorities SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) Input from any other existing, new or replacement Fáilte Ireland monitoring programmes Internal review of progress with Climate Action Plan measures CSO data Data from the National Travel Survey EPA Air Quality Monitoring 	<ul style="list-style-type: none"> Review internal systems and, if necessary, the Strategy Where impacts are identified these will be investigated as per the Environmental Damage Resolution procedure Environmentally Responsible Tourism Promotion and Campaign Procedure will be available to assist in remedial action, where relevant, at a future date

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Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action ¹⁴
Climatic Factors ¹⁸	C	<ul style="list-style-type: none"> Compliance of funding approvals with Strategy measures relating to climate action – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy 	<ul style="list-style-type: none"> For funding only to be provided when applications demonstrate that they comply with all Strategy measures relating to climate action – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy 	<ul style="list-style-type: none"> Internal review of grants of funding, including compliance with Strategy's mitigation – see Section 9 SEA ER Environmental assessment and decision making by local authorities SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) Input from any other existing, new or replacement Fáilte Ireland monitoring programmes Internal review of progress with Climate Action Plan measures EPA Annual National Greenhouse Gas Emissions Inventory reporting Climate Action Regional Office Consultations with DECC Monitoring relating to transport use by tourists where available 	<ul style="list-style-type: none"> Review internal systems and, if necessary, the Strategy Where impacts are identified these will be investigated as per the Environmental Damage Resolution procedure Environmentally Responsible Tourism Promotion and Campaign Procedure will be available to assist in remedial action, where relevant, at a future date
		<ul style="list-style-type: none"> Fulfilment of Climate Action Plan measures where Fáilte Ireland is Lead or Key Stakeholder 	<ul style="list-style-type: none"> Maximise fulfilment of Climate Action Plan measures where Fáilte Ireland is Lead or Key Stakeholder 		
		<ul style="list-style-type: none"> A competitive, low-carbon, climate-resilient and environmentally sustainable economy 	<ul style="list-style-type: none"> Contribute towards transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050 		
		<ul style="list-style-type: none"> Share of renewable energy in transport 	<ul style="list-style-type: none"> Contribute towards the targets of the Renewable Energy Directive (2009/28/EC), for all Member States to reach: a 16% share of renewable energy in Gross Final Consumption (GFC); and a 10% share of renewable energy in transport, by facilitating the development of electricity charging and transmission infrastructure in compliance with the provisions of the Strategy. 		
		<ul style="list-style-type: none"> Greenhouse gas emissions across related sectors 	<ul style="list-style-type: none"> Contribute towards greenhouse gas emission reduction targets across related sectors including electricity (75%), transport (50%), buildings (commercial and public) (45%), buildings (residential) (40%), industry (35%), agriculture (25%) and other (gases, petroleum refining and waste) (50%) 		
		<ul style="list-style-type: none"> Energy consumption, the uptake of renewable options and solid fuels for residential heating 	<ul style="list-style-type: none"> To promote reduced energy consumption and support the uptake of renewable options and a move away from solid fuels for residential heating 		
		<ul style="list-style-type: none"> Proportion of journeys made by low carbon transport modes 	<ul style="list-style-type: none"> Increase in the proportion of journeys made by low carbon transport modes, where survey information is available 		
Cultural Heritage	CH	<ul style="list-style-type: none"> Compliance of funding approvals with Strategy measures providing for the protection of cultural heritage – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy 	<ul style="list-style-type: none"> For funding only to be provided when applications demonstrate that they comply with all Strategy measures providing for the protection of cultural heritage – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy 	<ul style="list-style-type: none"> Internal review of grants of funding, including compliance with Strategy's mitigation – see Section 9 SEA ER Environmental assessment and decision making by local authorities SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) Input from any other existing, new or 	<ul style="list-style-type: none"> Review internal systems and, if necessary, the Strategy Where impacts are identified these will be investigated as per the Environmental Damage Resolution procedure Environmentally Responsible Tourism
		<ul style="list-style-type: none"> Percentage of entries to the Record of Monuments and Places, and the context these entries within the surrounding landscape where relevant, protected from 	<ul style="list-style-type: none"> Protect entries to the Record of Monuments and Places, and the context of these entries within the surrounding landscape where relevant, from significant adverse effects 		

¹⁸ Please also refer to relevant legislation and requirements under Section 4.10, Section 8, Section 9 and Appendices III and IV. Targets under the national Climate Action Plan are reviewed and updated periodically and include those under the headings of Electricity, Built Environment, Transport, Agriculture, Forestry and Land Use and Enterprise.

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Environmental Component	SEO Code	Indicators	Targets	Sources	Remedial Action ¹⁴
		<p>significant adverse effects resulting from development that is funded under the Strategy</p> <ul style="list-style-type: none"> Percentage of entries to the Record of Protected Structures and Architectural Conservation Areas and their context protected from significant adverse effects resulting from development that is funded under the Strategy 	<p>resulting from development that is funded under the Strategy</p> <ul style="list-style-type: none"> Protect entries to the Record of Protected Structures and Architectural Conservation Areas and their context from significant adverse effects resulting from development that is funded under the Strategy 	<p>replacement Fáilte Ireland monitoring programmes</p>	<p>Promotion and Campaign Procedure will be available to assist in remedial action, where relevant, at a future date</p>
Landscape	L	<ul style="list-style-type: none"> Compliance of funding approvals with Strategy measures providing for the protection of the landscape – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy Number of developments funded that result in avoidable adverse visual impacts on the landscape, especially with regard to landscape designations, resulting from development that is funded under the Strategy 	<ul style="list-style-type: none"> For funding only to be provided when applications demonstrate that they comply with all Strategy measures providing for the protection of the landscape – Section 9 of the SEA Environmental Report identifies a selection of such measures from the Strategy No developments funded that result in avoidable adverse visual impacts on the landscape, especially with regard to landscape designations, resulting from development that is funded under the Strategy 	<ul style="list-style-type: none"> Internal review of grants of funding, including compliance with Strategy’s mitigation – see Section 9 SEA ER Environmental assessment and decision making by local authorities SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) Input from any other existing, new or replacement Fáilte Ireland monitoring programmes 	<ul style="list-style-type: none"> Review internal systems and, if necessary, the Strategy Where impacts are identified these will be investigated as per the Environmental Damage Resolution procedure Environmentally Responsible Tourism Promotion and Campaign Procedure will be available to assist in remedial action, where relevant, at a future date

Appendix I SEA Scoping Submissions and Responses

Draft Dublin Regional Tourism Development Strategy 2023-2027		
No.	Submission Text	SEA Response
Submission from the Environmental Protection Agency		
1	<p>We acknowledge your notice, dated 8th March 2022, in relation to the Draft Dublin Regional Tourism Strategy 2022-2026 (the 'Strategy').</p> <p>The EPA is a designated statutory environmental authority under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Strategy and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the Strategy. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.</p> <p>Where we provide specific comments on plans and programmes, our comments will focus on the EPA's remit and areas of expertise (in particular water, air, climate change, waste, resource efficiency, noise, radon and the inter-relationships between these and other relevant topics e.g. biodiversity), as appropriate and relevant to the particular plan or programme.</p>	Noted.
2	<p>We attach our 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' document which sets out recommendations to integrate environmental considerations into Local Authority land use plans. Given that the broad principles and many of the issues addressed in this document also apply to tourism, we suggest that you consider this guidance document, where relevant and appropriate, in preparing the Strategy and in undertaking the SEA.</p>	Noted. The key environmental issues will be considered by the SEA, as appropriate and relevant to the Plan.
3	<p>State of the Environment & Key Actions for Ireland</p> <p>In developing the Strategy and integrating the findings of the SEA into the Strategy, the relevant recommendations, key issues and challenges described in our State of the Environment Report <i>Ireland's Environment – An Integrated Assessment 2020</i> (EPA, 2020) should be taken into account.</p> <p>The relevant objectives and policy commitments of the National Planning Framework and the Regional Spatial and Economic Strategies should be aligned with the Strategy and considered, as appropriate.</p>	<p>This report has been considered in the preparation of this SEA Scoping Report and will be kept on file for reference throughout the SEA process, as relevant and appropriate to the Strategy.</p> <p>The relevant objectives and policy commitments of the National Planning Framework and the Regional Spatial and Economic Strategies will be considered throughout the SEA process, as relevant and appropriate to the Strategy.</p>
4	<p>Transition to a low carbon climate resilient economy and society</p> <p>You should ensure that the Strategy aligns with national commitments on climate change mitigation and adaptation, as well as any relevant sectoral, regional and local adaptation plans.</p>	Noted. The SEA will seek to ensure that the Strategy contributes towards climate mitigation and adaptation, as well as any relevant sectoral, regional and local adaptation plans.
5	<p>Appendix I – Comments on the SEA Process</p> <p>The EPA may provide additional comments upon receipt of the SEA Environmental Report and Draft Plan at the next stage of the SEA process.</p> <p>Scope of the SEA</p> <p>The Strategy should clearly set out the scope, remit and implementation related elements. These will have implications for the SEA, in terms of guiding the level of assessment applicable at the appropriate level for the Strategy. Where it is envisaged that measures proposed in the Strategy will be implemented via other plans, which themselves have been or will be subject to SEA, this should be explained in the Environmental Report and taken into account in the assessment.</p> <p>Where specific measures will be implemented directly, further detail should be provided in the Environmental Report and the Strategy on the relevant environmental assessments to be carried out at the project stage and relevant mitigation measures to be applied, as appropriate. There may be merit in exploring this issue further with the relevant Environmental Authorities during the Strategy-preparation and SEA processes.</p>	<p>Noted. The provisions of the Strategy will be subject to SEA.</p> <p>Implementing the Strategy will involve Fáilte Ireland helping to facilitate, promote, support and coordinate stakeholders (including local authorities, other government agencies, tourism operators, stakeholders and visitors) in their activities in a way that is consistent with existing and emerging plans that have been subject to environmental assessment. The Strategy will not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent.</p> <p>The Strategy is 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</p>

		<p>management. These other existing policies, plans etc. have been subject to their own environmental assessment processes, as relevant, and form the decision-making and consent-granting framework.</p> <p>Implementation of the Strategy shall be consistent with and conform with the NPF, 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 the Strategy (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 Strategy is not part and does not contribute towards.</p> <p>Any additional, future comments from the EPA will be taken into account.</p>
6	<p>Assessment of Environmental Effects</p> <p>The assessment should identify and focus on the key relevant environmental aspects of the Strategy. The methodology applied to assess the likely significant effects of implementing the Strategy should be described, along with any assumptions made. Where possible and practical, quantitative assessments should be undertaken.</p> <p>In developing the SEA assessment framework/methodology, you should ensure that the environmental objectives/targets /indicators selected are relevant and specific to the scope, context and remit of the Strategy. You should assess and document the full range of significant environmental effects of implementing the Strategy (secondary, cumulative, synergistic, short, medium and long term, permanent, temporary, positive and negative).</p> <p>The assessment should consider the potential for cumulative effects associated with the implementation of the Strategy in association with other relevant plans/programmes and projects within and adjacent to the Strategy area.</p>	<p>The relevant aspects of the current state of the environment and the Strategic Environmental Objectives will be used in the assessment of the Strategy.</p> <p>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.</p>
7	<p>Infrastructure-related Considerations</p> <p>The SEA should assess the potential additional pressures (including seasonal variations) on existing critical infrastructure (drinking water, wastewater, waste, transport) servicing areas associated with any projected increased visitor numbers. An increase in visitor numbers, for example, may have the potential to result in pressures on both surface waters and groundwaters, due to increased demands on water supply and increased loadings to existing wastewater treatment facilities. This would provide a better indication of the nature and possible scale of impacts that could be expected. There is merit in recommending the need for close collaboration with the relevant stakeholders, such as local authorities and Irish Water, to ensure that proposed tourism development aligns with the capacity of the supporting critical service infrastructure.</p>	<p>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. The promotion of developing visitor-friendly infrastructure where it is required will also be encouraged.</p> <p>Close collaboration with the relevant stakeholders, such as local authorities and Irish Water, to ensure that proposed tourism development aligns with the capacity of the supporting critical service infrastructure will be recommended in the SEA process.</p>
8	<p>Traffic Management</p> <p>The SEA should promote the need to work with the relevant stakeholders to avoid, reduce and mitigate the potential environmental effects of a likely increase in tourism-related traffic volumes, along any routes resulting from implementation of the Strategy. The need for additional parking during peak season and any required road improvements / road maintenance associated with increased traffic volumes should be assessed in collaboration with the relevant stakeholders. Possible alternative traffic management scenarios should also be considered. The</p>	<p>Noted. The provisions of the Strategy related to traffic management will be subject to SEA.</p> <p>With respect to infrastructural capacity (including transport and traffic management), the potential impact on existing infrastructure as well as the potential environmental effects of a</p>

	<p>provision of charging infrastructure for electric vehicles in designated parking spots should be prioritised, in collaboration with the relevant stakeholders. It would be useful to describe the range of works likely to be involved in implementing the Strategy, including aspects such as the provision of signage, discovery point information etc. The relevant recommendations in Chapter 11 – Environment and Transport of our State of the Environment Report would be important to consider, as appropriate and where relevant to the Strategy.</p>	<p>likely increase in tourism-related traffic volumes along any routes resulting from the relevant initiative shall be considered and mitigated as appropriate, where relevant. The promotion of developing visitor-friendly infrastructure where it is required will also be encouraged.</p> <p>Close collaboration with the relevant stakeholders, such as local authorities, to ensure that proposed tourism development aligns with the capacity of the supporting critical service infrastructure will be recommended in the SEA process</p>
9	<p>Water Quality</p> <p>The Strategy should include clear commitments to protect both surface water (including rivers, lakes and estuaries), groundwater and their associated habitats and species, including fisheries, within and adjacent to the Strategy area. Where specific recommendations/concerns for water bodies within the Strategy area are identified in EPA water quality reports, including the Water Quality in Ireland 2020 – An Indicators Report (EPA, 2021) and the Bathing Water Quality in Ireland - 2020 (EPA, 2021), or www.catchments.ie, these should also be considered at an appropriate level in the Strategy. Water quality reports are prepared by the EPA on an annual basis and once published, the relevant reports for 2021, should be considered, where appropriate and where relevant.</p> <p>The Strategy should consider any relevant objectives and measures for individual water bodies within the Strategy area, as set out in the River Basin Management Plan (RBMP) 2018-2021 (and in the subsequent third cycle RBMP, currently being prepared and undergoing SEA). This is important, in the context of ensuring that tourism developments arising from implementing the Strategy support the need to protect and where possible improve water quality status.</p> <p>An assessment should be undertaken to determine whether any proposals and associated development could be potentially in conflict with the overall RBMP including the Areas for Action. Any proposals which are identified to be in potential conflict with the RBMP and Water Framework Directive (WFD) objectives, should be re-examined with a view to ensuring the conflicts are removed through a suitable strategy of avoidance and/or mitigation as appropriate. It is worth noting that the DHLGH are preparing guidelines to incorporate the WFD into the planning system. There is merit in including a commitment, that once published, these will be incorporated as appropriate into any relevant tourism developments.</p>	<p>The SEA will use information from the EPA regarding surface water status, including that contained within Integrated Water Quality Reports. The SEA will also include information on groundwater status.</p> <p>Relevant objectives and measures for individual water bodies within the Strategy area, as set out in the River Basin Management Plan (RBMP) 2018-2021 River Basin Management Plan (RBMP) 2018-2021 (and the subsequent versions) will be considered in the SEA. The SEA will seek to ensure the integration of appropriate provisions relating to the WFD and River Basin Management Plan into the Strategy.</p>
10	<p>Biodiversity</p> <p>The Strategy should include specific commitments to protect designated habitats and protected species (and associated ecological corridors/linkages) within and adjacent to the Strategy area. The findings of the Appropriate Assessment (AA) should be reflected in the relevant sections of the SEA. You should consult with the National Parks and Wildlife Service (NPWS) regarding any existing or proposed new conservation management plans and where relevant, these should be integrated into the Strategy and its implementation.</p> <p>The EPA published guidance on Integrated Biodiversity Impact Assessment - Streamlining AA, SEA and EIA Processes. Good Practice Guidance (EPA, 2013) may be useful to consider in preparing the Strategy and SEA.</p>	<p>The cited guidance will be considered as part of the preparation of the Strategy and associated environmental assessments. The SEA will seek to ensure that the Strategy, which will include specific actions/objectives and commitments to protect designated habitats and protected species (and associated ecological corridors/linkages) within, and adjacent to, the Strategy area.</p>
11	<p>Ecosystem Services & Green Infrastructure</p> <p>There is merit in considering adopting an ecosystem services approach to the relevant aspects of the SEA. The Strategy area supports a significant ecological resource, with associated ecosystem services, that can benefit local communities and the local economy, while also protecting environmental sensitivities and vulnerabilities. The Strategy should include a section that recognises the ecosystem services in the Strategy area. The Strategy should consider a commitment to mapping the services within the key destination sites and associated catchment zones/usage areas within and in the zone of influence of the destination areas/sites.</p> <p>The EPA funded Irish Natural Capital Accounting for Sustainable Environments (INCASE) research project outputs might be useful. (https://www.incaseproject.com/). In particular, one of the case studies (the Dargle) is in the Strategy area. It may assist in considering any relevant natural capital accounting aspects.</p> <p>In implementing the Strategy, tourism-related development and associated activities should be managed in a manner that avoids or minimises the potential for significant disturbance to habitats and species. Habitat mapping</p>	<p>The ecosystem services approach will be considered and integrated with the relevant aspects of the SEA. In recognition of the need to manage natural capital, provisions will be integrated into the Strategy that will contribute towards the management of air quality, noise pollution, light pollution, pollination, flood risk, water bodies and river basins and natural resources supporting energy production and recreation - this will include a section that recognises the ecosystem services in the Strategy area. The SEA will examine the availability of existing sources of baseline data and include and/or reference relevant datasets.</p>

	and related ecosystem services mapping, where available, should be incorporated into the Strategy. This could also be strengthened by highlighting the need for a “green infrastructure first” approach and provision of guiding advice on how to implement green infrastructure as part of development plans. Our State of the Environment Report Ireland’s Environment – An Integrated Assessment 2020 (EPA, 2020) also highlights that high-quality green and blue spaces are important not just for nature but for peoples’ health & wellbeing, particularly in the context of an increasingly urban society and increasing settlement densities.	
12	<i>Invasive Alien Species Control and Management</i> Control and management of invasive alien species should be considered in the planning, construction, and carrying out of maintenance activities (e.g. hedgerow cutting, road or development works) associated with implementing the Strategy. A commitment should be included to ensure that implementation of the Strategy minimises the risk of spreading invasive species, both aquatic and terrestrial.	The SEA will seek to ensure the integration of appropriate provisions relating to the control and management of invasive alien species is integrated into the Strategy.
13	<i>Landscape Considerations</i> In preparing the Strategy and SEA, landscape sensitivity should be considered. The Strategy should consider available Local Authority landscape character assessments, and available habitat mapping within the Strategy area.	Local Authority Landscape Character Assessments, including landscape sensitivity and habitat mapping, will be considered in the preparation of the Strategy and SEA, where available.
14	<i>Consideration of Alternatives</i> The development of alternatives and methodology applied in the assessment of alternatives, along with any assumptions made, should be clearly described. Our guidance on Developing and Assessing Alternatives in Strategic Environmental Assessment (EPA, 2015) may be useful in this regard. Key impacts arising from the Strategy may be related to increased tourist numbers/traffic movements and associated pressures on critical water and transport infrastructure. This should be reflected in the assessment of and consideration of alternatives. In developing and assessing alternatives, the alternatives proposed should be reasonable and realistic and should be set at the appropriate level of the Strategy within the tourism planning hierarchy. They should be assessed against the relevant environmental objectives established for the key environmental aspects of the environment likely to be significantly affected. Clear justification should be provided for the selection of the preferred alternative/ combination of alternatives.	The SEA will examine different reasonable alternatives/options for the Strategy, taking into account the objectives and the geographical scope of the Strategy, and pressures on critical water and transport infrastructure will be considered.
15	<i>Integration of SEA into the Strategy</i> All recommendations from the SEA and AA processes, including mitigation measures, should be integrated in the Strategy. We recommend that the Strategy includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and Strategy policies/measures. Providing a chapter in the Strategy, that summarises the findings of the environmental assessments carried out, would be beneficial. It would clearly establish the link between the Strategy and SEA preparation processes and show how environmental considerations identified have been reflected in the Strategy.	The SEA and AA team will work with the Strategy-preparation team at Fáilte Ireland in order to integrate requirements for environmental protection and management into the Strategy. Potentially significant adverse environmental effects arising from the Strategy, will be mitigated by various provisions integrated into the Strategy including those that have arisen through the SEA and AA processes.
16	<i>Monitoring, Review & Reporting</i> We acknowledge that the scoping report identifies that the monitoring programme will “collate and interpret existing national environmental indicator data, compiling the results into annual Macro-Monitoring Reports.” This is welcomed and will help ensure that environmentally sustainable tourism will be monitored and promoted over the lifetime of the Strategy. We suggest including a separate section on ‘Monitoring, Review and Reporting’ in the Strategy, setting out the provisions for monitoring and reporting on the implementation of the Strategy and periodic reviews. There may be merits in aligning the periodic reviews of the Strategy with existing cyclical reporting e.g. State of the Environment reports, National Planning Framework, Water Framework Directive, Marine Strategy Framework Directive etc. We recommend aligning the Strategy implementation monitoring/reporting with the environmental monitoring required under the SEA legislation. Doing so would enable the environmental performance of the Strategy to be evaluated and would also provide for increased transparency during implementation. The SEA-related monitoring should address positive, negative and cumulative effects where they are likely to occur and should include provision for on-going review to facilitate an early response to any environmental issues that may	The SEA ER will include measures for monitoring the likely significant environmental effects of implementing the Strategy. The SEA Environmental Report will refer to any relevant monitoring, review and reporting on the impacts of relevant tourism initiatives.

	arise. The Environmental Report should specify the monitoring frequency and responsibilities and include provisions for reporting on the monitoring. To avoid duplication in data collection, the same indicators should be used for the Strategy -related and SEA-related monitoring where possible.	
17	<p>Data & Knowledge Gaps</p> <p>The Strategy should identify any significant data and knowledge gaps, include commitments to help address these on a priority basis during the implementation phase of the Strategy. This is with a view to strengthening the evidence base for future reviews and iterations of the Strategy.</p> <p>The EPA may provide additional comments upon receipt of the SEA Environmental Report and Draft Strategy at the next stage of the SEA process.</p>	Any significant data and knowledge gaps will be identified and include commitments to help address these on a priority basis during the implementation phase of the Strategy.
18	<p>Available Guidance & Resources</p> <p>Our website contains various SEA resources and guidance, including:</p> <ul style="list-style-type: none"> - SEA process guidance and checklists - Inventory of spatial datasets relevant to SEA - topic specific SEA guidance (including Good practice note on Cumulative Effects Assessment (EPA, 2020), Guidance on SEA Statements and Monitoring (EPA, 2020), Integrating climatic factors into SEA (EPA, 2019), Developing and Assessing Alternatives in SEA (EPA, 2015), and Integrated Biodiversity Impact Assessment (EPA, 2012)) <p>You can access these guidance notes and other resources at: https://www.epa.ie/our-services/monitoring--assessment/assessment/strategic-environmental-assessment/sea-topic-and-sector-specific-guidance/</p> <p>You should also consider and take into account the updated national SEA Guidelines: Strategic Environmental Assessment: Guidelines for Regional Assemblies and Planning Authorities (DHLGH, 2022).</p>	This guidance has been considered in the preparation of this SEA Scoping Report and will be kept on file for reference throughout the SEA process.
19	<p>Environmental Sensitivity Mapping (ESM) Webtool</p> <p>The ESM Webtool is a decision support tool to assist SEA and planning processes in Ireland. The tool brings together over 100 datasets and allows users to explore environmental considerations within a particular area and create plan-specific environmental sensitivity maps. These maps can help planners anticipate potential land-use conflicts and help identify suitable development locations, while also protecting the environment. The ESM Webtool is available at www.enviromap.ie.</p>	The Environmental Sensitivity Mapping (ESM) WebTool has been considered in the preparation of this report and will be considered throughout the SEA process.
20	<p>EPA SEA WebGIS Tool</p> <p>Our SEA WebGIS Tool is available at https://gis.epa.ie/EPAMaps/SEA. It allows users to produce an indicative report on key aspects of the environment in a specific geographic area. It is intended to assist public authorities in SEA screening and scoping exercises.</p>	EPA SEA tool has been considered in the preparation of this report and will be considered throughout the SEA process.
21	<p>EPA WFD Application</p> <p>Our WFD Application provides a single point of access to water quality and catchment data from the national WFD monitoring programme. The Application is publicly available via www.catchments.ie.</p>	EPA WFD data has been considered in the preparation of this report and will be considered throughout the SEA process.
22	<p>EPA Appropriate Assessment GeoTool</p> <p>Our AA GeoTool application has been developed in partnership with the NPWS. It allows users to select a location, specify a search area and gather available information for each European Site within the area. It is available at: https://gis.epa.ie/EPAMaps/AAGeoTool.</p>	This source of information will be considered by the AA and SEA where appropriate.
23	<p>Environmental Authorities</p> <p>Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Environment, Climate and Communications; • Minister for Agriculture, Food and the Marine. 	Notice has also been given to relevant environmental authorities as part of the SEA scoping process.
24	<p>Appendix II – Comments on the Scoping Report</p> <p>Some suggested key plans and programmes are provided below, that should be considered, where relevant and as appropriate in preparing the SEA and the Draft Strategy. We recommend including schematics in the Strategy and SEA Environmental Report, showing the links and key inter-relationships with other key relevant national, regional, sectoral and environmental plans.</p> <p>Key Plans and Programmes</p> <p><i>Spatial Planning</i></p>	These plans and programmes (and any new, subsequent versions) will be considered as part of the preparation of the Strategy and associated environmental assessments, as relevant.

	<ul style="list-style-type: none"> - National Planning Framework - Regional Spatial and Economic Strategies - Local Authority Land use Plans <i>Sustainable Development</i> - National Implementation Plan for the Sustainable Development Goals <i>Tourism</i> - National Greenways Strategy - Local authority tourism strategies - Visitor Experience Development Plans and Visitor Management Plans <i>Climate</i> - Relevant sectoral, regional and local authority climate adaptation and mitigation plans/strategies – including the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (DHLGH, 2019). - Relevant OPW Flood Risk Managements Plans and associated flood risk mapping - National Climate Action Plan 2021 - National Adaptation Framework <i>Biodiversity</i> - National Biodiversity Action Plan - All Island Pollinator Plan - Local authority biodiversity/heritage plans and habitat mapping <i>Water & Water Services</i> - River Basin Management Plan for Ireland 2018-2021, and the Draft River Basin Management Plan 2022-2027 (DHLGH, draft) - Water Services Strategic Plan / Capital Investment Programme and National Water Resources Plan (Irish Water). The Regional Water Resource plans (Irish Water, in preparation) should also be considered over the lifetime of the Strategy. <i>Transport</i> - Greater Dublin Area Transport Strategy 2016-2035(NTA) - National Investment Framework for Transport Investment (DTTAS) 10 - National Cycle Plan (TII, in preparation) <i>Air & Noise</i> - National Clean Air Strategy (DCCAE, in prep) - National Air Pollution Control Programme (DCCAE, 2021) - Local Authority Noise Action Plans - Noise Action Plan for Dublin Airport – 2019-2023 <i>Waste</i> - National Circular Economy Strategy (DECC) 	
Submission from the Department of Communications, Climate Action and Environment (Environmental Protection and Circular Economy – Materials Management Divisions)		
1	In respect of waste in the within documentation, we would be obliged if the Local Authority would consult directly with their respective Regional Waste Management Planning Office regarding development of the final plans.	Noted. Additional issues/comments submitted during the public consultation stage will be considered by the assessments where appropriate.
Submission from the Department of Communications, Climate Action and Environment (Geological Survey Ireland Division)		
1	<p>Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our website for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.</p> <p>With reference to your email received on the 08 March 2022, concerning the SEA Scoping for Fáilte Ireland's Dublin Regional Tourism Strategy 2022-2026, Geological Survey Ireland would encourage use of and reference to our</p>	The GSI map viewer and other available GSI datasets has been considered in the preparation of this report and will be considered throughout the SEA process.

	datasets. This data can add to the content and robustness of the SEA process. With this in mind please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment.	
2	In Section 3.5 'Soil', of the draft SEA Report, we welcome that "The SEA will reference datasets available from GSI that may be useful to lower-tier project planning, including those relating to Bedrock Geology, Quaternary Geology, Mineral deposits and Aggregate Potential". The remainder of this letter and following sections provide more detail and updated information on some of these datasets.	Noted. Relevant geological heritage will be considered in the preparation of the SEA Environmental Report.
3	<p>Geoheritage</p> <p>In Section 3.5 'Soil', of the draft SEA Report, we note reference to "relevant geological heritage (including County Geological Sites)..... will be taken into account and will be considered by the SEA".</p> <p>The Geological Heritage audits for local authority areas within the Dublin Regional Tourism Strategy can be found at:</p> <ul style="list-style-type: none"> • The Geological Heritage of Dublin City (published in 2014) • The Geological Heritage of Fingal (published in 2007) • The Geological Heritage of South Dublin (published in 2014) • The Geological Heritage of Dún Laoghaire-Rathdown (published in 2014) <p>Geological Survey Ireland is in partnership with the National Parks and Wildlife Service (NPWS) in the Department of Culture, Heritage and the Gaeltacht to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Geoheritage Programme in Geological Survey Ireland, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme were rigorously selected by a panel of theme experts.</p> <p>CGSs have been adopted in the National Heritage Plan, and will form a major strand of geological nature conservation to complement the various ecological and cultural conservation measures. It is important to note however, that management issues for the majority of geological heritage sites may differ from ecological sites. County Geological Sites are the optimal way of addressing the responsibility of each authority under the Planning and Development Act 2000 and its amendments, to protect sites of geological interest.</p> <p>As always we are available if you require any further information, please feel free to contact Clare Glanville (Clare.Glanville@gsi.ie).</p>	Noted. This information and recommendations will be considered throughout the SEA process.
4	<p>Culture and Tourism</p> <p>A report on the Irish Geoheritage Sector carried out in 2016 by INDECON for Geological Survey Ireland showed that tourism in sites of geological value contributed €240 million to the Irish economy that year. While not all tourists were aware of the geological value of the sites of beauty they visited, it is undeniable that our geology, landscape, soils and weather formed the raw materials of Fáilte Ireland's brands of the Wild Atlantic Way and Ireland's Hidden Heartlands. Geological Survey Ireland supports Ireland's three UNESCO Global Geoparks (Copper Coast, Burren and Cliffs of Moher, Cuilcagh Lakelands), and one aspiring geopark on the Co Galway/Co Mayo border (Joyce Country and Western Lakes).</p> <p>We would encourage Fáilte Ireland to continue this trend of promotion of geological value of the sites tourists visit. We would encourage geology to be a significant part of any tourism initiative including DEDPs and VEDPs that may be introduced and happy to assist with this process. The existing information on the county geological sites could be incorporated into relevant DEDP/VEDP themes as they are developed. Geological Survey Ireland would welcome the opportunity to partner with Fáilte Ireland or any regional tourism initiative in the development of geological or geological heritage interpretation in the form of walks, signage or information sites. For example, recent Draft County Development Plans within the area covered by this strategy document include plans to implement nature signage, and enhancing existing rights of way to ensure access to amenities; we would encourage coordinated efforts with the local authorities in these areas. The 175th anniversary of the Geological Survey in Ireland was marked in 2020 and the Survey holds the original maps and associated artwork from the first geological mapping of Ireland. We also have information on historical mine sites.</p>	Noted – such issues will be taken into account when preparing SEA recommendations relating to cultural heritage.
5	<p>Dimension Stone/Stone Built Ireland</p> <p>Geological Survey Ireland has considerable databases on Dimension Stone and have an ongoing research</p>	Noted. This information and recommendations will be considered throughout the SEA process.

	<p>collaboration agreement with, TCD & OPW, to run for a 2 year period with the aim of documenting building and decorative stone in Ireland to inform government agencies, building owners and conservationists of the sources for suitable replacement stone in restoration work and to develop a greater awareness among the general public. In addition to promoting citizen science and awareness of local materials, the inventory will aid the public in complying with part 4 of the Planning and Development Act 2000, which requires owners to conserve protected structures. It will also assist local authorities in issuing Section 57 Declarations, which outline 'the type of works which it considers would or would not materially affect the character of the structure or any element of the structure'. This project will build on work already completed funded by the Irish Research Council (March 2019 - September 2020) that carried on primary research on the topic and developed a simple database and web-based platform as well as hosting various heritage displays at venues.</p> <p>The 'Stone Built Ireland' project may assist in particular in developing projects for Fáilte Ireland's Regional Tourism Strategies and could be covered under a theme such as Architectural Heritage or similar.</p>	
<p>6</p>	<p>Groundwater Geological Survey Ireland's Groundwater and Geothermal Unit, provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems.</p> <p>Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our Map viewer which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.</p> <p>Geological Survey Ireland has completed Groundwater Protection Schemes (GWPSs) in partnership with Local Authorities, and there is now national coverage of GWPS mapping. A Groundwater Protection Scheme provides guidelines for the planning and licensing authorities in carrying out their functions, and a framework to assist in decision-making on the location, nature and control of developments and activities in order to protect groundwater. The Groundwater Protection Response overview and link to the main reports is here: https://www.gsi.ie/en-ie/programmes-and-projects/groundwater/projects/protecting-drinking-water/what-is-drinking-water-protection/county-groundwater-protection-schemes/Pages/default.aspx.</p> <p>GWClimate is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Maps and data are available on the Map viewer.</p>	<p>Impacts on groundwater will be considered by the SEA.</p> <p>Aquifer productivity and vulnerability mapping will be included in the SEA Environmental Report.</p> <p>The SEA Environmental Report will reference datasets available from GSI that may be useful to lower-tier project planning, including those relating to Aquifer Productivity, Aquifer Vulnerability, Bedrock Geology, Quaternary Geology, Mineral deposits, Aggregate Potential, Groundwater Resources, and Geohazards, such as Landslide Events and Landslide Susceptibility Mapping, Physiographic Units Mapping, Geochemistry data, Geophysical data of soils and rocks and GSI Marine and Coastal Unit data.</p> <p>Regarding geothermal energy, SEA considers the environmental effects of Plan policies and objectives – including any providing for geothermal energy. Potential environmental effects arising from geothermal energy may include contributions towards greenhouse gas emission targets and effects on water quality, ecology, soil stability. Inclusion of Geothermal Suitability mapping is not within the scope of the SEA, however where it forms part of Plan policies/objectives, it would be considered by the SEA.</p>
	<p>Geological Mapping Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found here, in your future assessments.</p> <p>Our 3D models can help stakeholders visualize, understand and characterise geology, for deposit and resource mapping, for flooding and for urban geology applications including basement impact assessment, Sustainable Drainage Systems (SuDS), and subsurface management. Our 3D models offer a key element of geotechnical risk management by identifying areas requiring further site investigation.</p> <p>Further information on the bedrock and Quaternary 3D models of Dublin is available here.</p>	<p>Mineral resources will be recognised as a material asset by the SEA.</p>
	<p>Geohazards Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.</p> <p>Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated Map Viewer. Associated guidance documentation relating to the National Landslide Susceptibility Map is also available.</p>	

	<p>Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.</p> <p>Coastal Vulnerability while seen as a potential geohazard, is discussed in more detail under our marine and coastal unit information below.</p>	
	<p><u>Historic Mines</u></p> <p>The EPA, Geological Survey Ireland and the former Exploration & Mining Division undertook a joint project entitled "Historic Mine Site - Inventory and Risk Characterisation (HMS - IRC)". This project carried out detailed site investigations and characterisation on priority historic mine sites in the country.</p> <p>A risk ranking methodology was developed which categorised the sites according to the risks posed to human and animal health and the environment. The project commenced in January 2006 and was completed in December 2008. A final report and a GIS geodatabase was produced on completion of the project. Reports and maps available here and here. The project provides an understanding of the impacts of historic mining sites in Ireland and their status at the time of the study.</p>	
	<p><u>Natural Resources (Minerals/Aggregates)</u></p> <p>Geological Survey Ireland is of the view that the sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required. Geological Survey Ireland highlights the consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process.</p> <p>Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our Minerals section of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our Map Viewer.</p> <p>We would recommend use of the Aggregate Potential Mapping viewer to identify areas of High to Very High source aggregate potential within the area. In keeping with a sustainable approach we would recommend use of our data and mapping viewers to identify and ensure that natural resources used any proposed tourism developments are sustainably sourced from properly recognised and licensed facilities, and that consideration of future resource sterilization is considered.</p>	
	<p><u>Marine and Coastal Unit</u></p> <p>Our marine environment is hugely important to our bio-economy, transport, tourism and recreational sectors. It is also an important indicator of the health of our planet. Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national marine mapping programme; providing key baseline data for Ireland's marine sector. The programme delivers a wide range of benefits to multi-sectoral end-users across the national blue economy with an emphasis on enabling our stakeholders. Demonstrated applications for the use of INFOMAR's suite of mapping products include Shipping & Navigation, Fisheries Management, Aquaculture, Off-shore Renewable Energies, Marine Leisure & Tourism and Coastal Behaviour.</p> <p>Of particular interest to tourism is the extensive database of shipwrecks mapped by the INFOMAR programme, many lost close to the coast and with engaging human interest stories associated with them https://www.infomar.ie/maps/story-maps/shipwrecks.</p> <p>INFOMAR also produces a wide variety of seabed mapping products that enable public and stakeholders to visualize Ireland's seafloor environment https://www.infomar.ie/maps/downloadable-maps/maps. Story maps have also been developed providing a different perspective of some of the bays and harbors of the Irish coastline. We would therefore recommend use of our Marine and Coastal Unit datasets available on our website and Map Viewer.</p> <p>The Marine and Coastal Unit also participate in coastal change projects such as CHERISH (Climate, Heritage and Environments of Reefs, Islands, and Headlands) and are undertaking mapping in areas such as coastal vulnerability and coastal erosion. Further information on these projects can be found at here.</p>	
	<p><u>Coastal Vulnerability Index</u></p> <p>Geological Survey Ireland is undertaking a new coastal vulnerability mapping initiative. Maps produced by this project will provide an insight into the relative susceptibility of the Irish coast to adverse impacts of sea-level rise through the use of a Coastal Vulnerability Index (CVI). Currently the project is being carried out on the east coast</p>	

	and will be rolled out nationally, detailed information and maps are available here. These index-based maps will offer a simple, easy visual representation of sensitive areas based on robust methods and conceptualised metrics from latest research, adapted to the Irish context. This will enable coastal managers to prioritize or concentrate efforts on adaptation.	
	<p>Physiographic Units</p> <p>Physiographic Units are cartographic representations of the broad-scale physical landscape of a region. They delineate physical regions showing internal uniformity with respect to one or more environmental attributes that can be clearly differentiated from neighbouring regions. They are valuable for regional land-use planning, and in studies of the influence of physical landscape on the ecological environment. This map is produced in support of the actions to be implemented in National Landscape Strategy for Ireland 2015 – 2025. Physiographic Units map data can be viewed online under the Physiographic Units tab on the online Map Viewer.</p>	
Submission from the Department of Agriculture, Food and the Marine		
1	Commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. It is essential that any negative impacts on fisheries are avoided. The evaluation of potential impacts on any commercial sea fishing activities needs to be given consideration as part of any planning/proposal process and during the development process itself. It is imperative that engagement should be sought with the fishing industry and other relevant stakeholders at as early a stage as possible to discuss any changes that may affect them to afford a chance for their input. Fishers' interests and livelihoods must be fully recognised, supported, and taken into account. We recognise and welcome the inclusion of fisheries as a material asset.	Noted. These issues will be considered by the assessment where relevant.
Submission from the Department for Communities (from the Historic Environment Division)		
1	<p>HISTORIC ENVIRONMENT DIVISION COMMENTS RE: FAILTE IRELAND REGIONAL TOURISM STRATEGIES SEA SCOPING REPORT</p> <p>DfC Historic Environment Division (HED) operate via a Service Level Agreement with colleagues in DAERA in relation to SEA, whereby, we provide authoritative comment and advice in relation to matters of Cultural Heritage including archaeological and architectural heritage. We make the following comments in respect of the documentation received by our office on 21/02/2022.</p>	Noted.
2	<p>HED welcomes that cultural heritage issues have been scoped in for assessment within the SEA for the Failte Ireland Regional Tourism Strategies. A large number of heritage assets predate the border itself and transboundary qualities such as the inter - relationships of sites, buildings and places and the potential effects with regard to impacts on their setting and the understanding and the experience of them, should be considered in the development of the four regional tourism strategies.</p> <p>Relevant Northern Ireland legislation and national plans should be referenced in the SEA Environmental report to facilitate appropriate consideration of the NI context, when considering the potential transboundary effects of the strategies on cultural heritage.</p> <p>National Legislation</p> <ul style="list-style-type: none"> • Planning Act (Northern Ireland) 2011 • Historic Monuments and Archaeological Objects (Northern Ireland) Order 1995 • Protection of Wrecks Act 1973 <p>National/Plans Programmes –</p> <ul style="list-style-type: none"> • Regional Development Strategy 2035 (infrastructure-ni.gov.uk) - Spatial strategy for Northern Ireland • Archaeology 2030 - A Strategic Approach for Northern Ireland.pdf (niheritagedelivers.org) • The Strategic Planning Policy Statement , Paragraphs 6.1-6.30 outlines the strategic planning policy around heritage assets in Northern Ireland 	Relevant Northern Ireland legislation and national plans will be referenced in the SEA Environmental report to facilitate appropriate consideration of the NI context, when considering the potential transboundary effects of the strategies on cultural heritage.
3	We welcome the acknowledgement in paragraphs 3.9.1 & 3.9.2 that the SEA report will provide available information on archaeological and architectural heritage in Northern Ireland. Baseline data should include datasets held in relation to Northern Ireland's Historic Environment, maintained by the Department for Communities. These datasets include recorded designated and non-designated heritage assets and may aid spatial understanding of the historic environment context and the heritage assets which enrich the NI tourism industry. https://www.communities-	Relevant Northern Ireland datasets and sources of information will be referenced in the SEA Environmental report to facilitate appropriate consideration of the NI context, when considering the potential transboundary effects of the strategies on cultural heritage.

	<p>ni.gov.uk/publications/historic-environment-digital-datasets These GIS datasets are available for download and can also be accessed via our Historic Environment Map Viewer https://www.communities-ni.gov.uk/services/historic-environment-map-viewer. We further advise that additional datasets for Northern Ireland's marine historic environment may be obtained through contacting colin.dunlop@daera-ni.gov.uk Under Para 4.4, bullet point 11, HED advises that the potential significant effects on archaeology and architecture should include impacts on their setting, also considering potential impacts on intangible heritage, i.e. folklore, customs, beliefs, traditions and knowledge. HED also recommends that the SEA report should consider potential effects on non-designated heritage assets, such as vernacular and industrial heritage. The regional tourism strategies provide the opportunity to promote the sustainable reuse of heritage assets, to support the tourism sector, e.g. vernacular or industrial heritage buildings as holiday accommodation or businesses, supporting the wider strategic aims of the corporate strategy 'To reduce the carbon footprint of the tourism sector and make it much more sustainable.'</p>	
Submission from the Department of Agriculture, Environment and Rural Affairs (from the Northern Ireland Environment Agency)		
1	<p>Thank you for your correspondence regarding the SEA Scoping Report for the Draft Regional Tourism Strategies. The Department of Agriculture, Environment and Rural Affairs Northern Ireland (DAERA) and (supported with a service level agreement) DfC Historic Environment Division (HED), has considered the consultation and associated documents and our opinions are set out below and in the additional attachment from HED.</p> <p>DAERA would like the SEA Environmental Report to contain a clear statement indicating the opinion about whether or not the implementation of the of the strategy is likely to have a significant effect on Northern Ireland, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment.</p>	<p>Noted. The SEA Environmental Report will provide information about any transboundary effects resulting from the implementation of the Strategy.</p>
2	<p>Natural Environment Division Comments</p> <p>NIEA Natural Environment Division works to ensure that Northern Ireland's special natural environment, including its flora and fauna and landscapes, is conserved, enhanced and managed for the benefit of this and future generations, thereby contributing to sustainable development.</p> <p>We note and welcome that transboundary issues will be considered as part of the Environmental Report and impacts on NI are mentioned throughout the scoping report, including recognition of NI designations. We would highlight consideration of the following issues including the potential disturbance to/impact on NI/RoI migratory/mobile species such as salmon, for example within the Lough Melvin Special Area of Conservation which lies within both Northern Ireland and the Republic of Ireland. Cross border designated sites, European sites in Northern Ireland adjacent to or with pathways to/from the Republic of Ireland, priority habitats, river basins, and other landscape types also require special attention as ecological functionality and 'views' of landscape cross political boundaries. The SEA should consider all potential impacts including those which may impact Northern Ireland both directly and indirectly. We welcome the recognition of ecological connectivity.</p> <p>NED are content with the overall approach to SEA and the issues that will be addressed including the consideration of how Environmental impacts will be addressed and mitigated, this should include potential impacts on NI.</p> <p>NED are in agreement and welcome the completion of a Habitats Regulations Assessment in parallel to the SEA.</p> <p>We welcome that monitoring will be put in place in due course and look forward to the opportunity to comment further as the process develops.</p>	<p>Cross border designated sites, European sites in Northern Ireland adjacent to or with pathways to/from the Republic of Ireland, priority habitats, river basins, and other landscape types, including the potential disturbance to/impact on NI/RoI migratory/mobile species such as salmon, will be considered by the SEA.</p>
3	<p>It may be worth including in your considerations the following:</p> <ul style="list-style-type: none"> • The Strategic Planning Policy Statement (SPPS) for Northern Ireland • Planning Policy Statements (PPS – in particular PPS2 and PPS18). It should be noted that the PPS's will be superseded by Local Development Plans when they are adopted. • Biodiversity Strategy for NI to 2020 https://www.daera-ni.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0 • Draft Environment Strategy https://www.daera-ni.gov.uk/consultations/esni-public-discussion-document • The Draft NI peatland policy: https://www.daera-ni.gov.uk/consultations/ni-peatland-strategy-consultation. • The Draft Green Growth Strategy Consultation on the draft Green Growth Strategy for Northern Ireland Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk) 	<p>These plans and programmes (and any new, subsequent versions) will be considered as part of the preparation of the Strategy and associated environmental assessments, as relevant.</p>

	<ul style="list-style-type: none"> Northern Ireland Energy Strategy 2050 Northern Ireland Energy Strategy 2050 Department for the Economy (economy-ni.gov.uk) <p>A number of useful information sources that highlight the current state of the environment in Northern Ireland at a regional level and which could be referenced are: Northern Ireland State of the Environment Reports: https://www.daera-ni.gov.uk/publications/state-environment-report-2013 Northern Ireland Environmental Statistics Reports: https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report Other relevant web-links are; Designated Scientific Sites: www.daera-ni.gov.uk/landing-pages/protected-areas Regional Landscape Character Map viewer: https://www.daera-ni.gov.uk/services/regional-landscape-character-areas-map-viewer DAERA have a map browser for NI protected sites and known priority habitat: www.daera-ni.gov.uk/services/natural-environment-map-viewer Our natural environment datasets are available at the link below: www.daera-ni.gov.uk/articles/download-digital-datasets Appropriate Assessments should refer to the status of habitats and species in the relevant reports available on the JNCC website as follows: UK Article 17 report for the Habitats Directive https://jncc.gov.uk/our-work/article-17-habitats-directive-report-2019/ and the UK Article 12 report for the Birds Directive https://jncc.gov.uk/our-work/european-reporting/#birds-directive-reporting Historic Environment Division Digital Datasets https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets Please note following the decision of the United Kingdom to leave the European Union, the collective term of "Natura 2000" sites the network of European protected sites are now known as "National Site Network" sites within the United Kingdom, and is including Northern Ireland.</p>	
4	<p>Climate Change Unit comments</p> <p>Climate Change Mitigation Branch refers Fáilte Ireland National Tourism Development Authority to the requirements laid out within the Climate Change Committee's Sixth Carbon Budget publication. A link for this can be found below. https://www.theccc.org.uk/publication/sixth-carbon-budget/</p> <p>The Climate Change Committee (CCC) recently published its UK Climate Risk Independent Assessment 2021 which identifies the risk and opportunities posed by climate change over the next five years. A summary for Northern Ireland can be found below. https://www.ukclimaterisk.org/independent-assessment-ccra3/national-summaries/</p>	Noted. These issues will be considered by the assessment where relevant.
5	<p>Drinking Water Inspectorate Comments</p> <p>The Drinking Water Inspectorate (DWI) welcome the opportunity to comment on the Fáilte Ireland Strategic Environmental Assessment Draft Scoping Report for the Regional Tourism Strategies 2022-2026. It is noted from reviewing the supplied document that Fáilte Ireland is preparing tourism sector Regional Tourism Strategies 2022-2026 for: Wild Atlantic Way; Ireland's Hidden Heartlands; Ireland's Ancient East; and Dublin. The DWI understand the purpose of this SEA Scoping Report is to define the scope of the environmental issues which are to be dealt with by the SEA process together with the level of detail to which it is intended to address these issues. To assist, the following specific points are provided for consideration in progressing the SEA Report its final form: With respect to Section 1.4.4, it would be beneficial to make specific reference to the transboundary element of the SEA process and the likely contact required with the appropriate Government departments in Northern Ireland. With respect to Sections 3.4 and 3.8.1, we note the SEA Environmental Report will consider information on population trends and density across the area to which the Strategies relate. Specific reference was made to the potential interactions between population trends and density and the contribution towards increased demand for water supply and associated potential impact of water abstraction. DWI would like to see specific detail on how the SEA will address the potential increased demands of a water supply due to an increase in tourism. As well as directing tourists towards areas that have adequate levels of water services, is there any intention to enhance water supply to areas which have high tourist potential but inadequate levels of water services? With respect to Section 3.6, it is</p>	<p>Noted. These issues will be considered by the assessment where relevant.</p> <p>To insert the following text into Section 1.4.4: "The SEA Environmental Report will provide information about any transboundary effects resulting from the implementation of the Strategy. Northern Ireland's Department of Agriculture, Environment and Rural Affairs Northern Ireland will be circulated the Strategy and associated documents and offered an opportunity to comment."</p> <p>The SEA will respond to the detailed provisions contained in the Strategy when prepared and recommend mitigation where appropriate. This outcome of this process will be detailed in the SEA Environmental Report.</p>

	acknowledged that the WFD status of surface and groundwater water bodies will extend to available information on water bodies status in Northern Ireland. For cross border locations, it is suggested that in addition to the considerations given to the WFD, explicit reference should be contained here to directly reference The Water Supply (Water Quality) Regulations (Northern Ireland) 2017 with consideration to how any water supply intended for human consumption will be monitored to ensure compliance with the Regulations.	
6	<p>Water Management Unit Comments</p> <p>Water Management Unit notes and welcomes the recognition of the issue of water management in NI through transboundary consideration. Water Management Unit consider it essential that all transboundary issues for water quality and water resource be considered in the SEA.</p> <p>Cross border river basins require special attention as ecological functionality cross jurisdictional boundaries. The SEA should consider all potential impacts including those which may impact Northern Ireland both directly and indirectly. DAERA has published the Draft River Basin Management Plan for the 3rd cycle period which runs from 2021-2027 which should also be considered as part of the assessment. The draft plan provides an update on the health of Northern Ireland's water environment (the status of water bodies) and sets out our targets (objectives) and actions (programme of measures) on how we want to improve our water environment in the next six years. The draft plan covers the North-Western, Neagh Bann and North Eastern river basin districts (RBD) and includes detailed status updates on each RBD.</p> <p>The documents can be downloaded from the consultation webpage: https://www.daera-ni.gov.uk/consultations/consultation-draft-3rd-cycle-river-basin-management-plan-2021-2027</p> <p>It should be noted that the consultation on the Draft River Basin Management Plan for the 3rd cycle has now closed and the consultation responses are currently being considered. The finalised River Basin Management Plan for the 3rd cycle is due to be published 9th April 2022.</p> <p>A number of useful information sources that highlight the current state of the environment in Northern Ireland at a regional level and which could be referenced are:</p> <p>Northern Ireland Environmental Statistics Reports: https://www.daera-ni.gov.uk/articles/northern-ireland-environmental-statistics-report</p> <p>Northern Ireland Water Framework Directive Statistics 2012 Northern Ireland Water Framework Directive Statistics Report 2021 Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk)</p>	Noted. These issues will be considered by the assessment where relevant.
7	<p>Marine and Fisheries Division Response</p> <p>Marine Plan</p> <p>The Marine Plan Team (MPT) DAERA – Marine & Fisheries Division) welcome the opportunity to comment on the Fáilte Ireland Strategic Environmental Assessment Draft Scoping Report for the Regional Tourism Strategies 2022-2026.</p> <p>It is noted from reviewing the supplied document that Fáilte Ireland is preparing tourism sector Regional Tourism Strategies 2022-2026 for: Wild Atlantic Way; Ireland's Hidden Heartlands; Ireland's Ancient East; and Dublin. It is understood that the purpose of the Strategies is to regionalise Fáilte Ireland's Corporate Strategy, provide a shared vision and strategy for tourism that will help coordinate a wide range of regional and local stakeholders and to provide a strategic framework for local Destination Experience Development Plans (DEDPs) and capital investment. The MPT understand the purpose of this SEA Scoping Report is to communicate and define the scope of the environmental issues which are to be dealt with by the SEA process on the Regional Tourism Strategies 2022-2026, together with the level of detail to which it is intended to address these issues.</p> <p>To assist, the following specific points are provided for consideration in progressing the ER to its final form:</p> <p>1.4.4 Scoping and consultations with environmental authorities</p> <p>It would be beneficial to make specific reference within this section to the transboundary element of the SEA process and the likely contact required with the appropriate Government departments in NI.</p> <p>3.3 Biodiversity and Flora and Fauna</p> <p>While references to marine related NHA's are noted in the footnotes at the top of page 9, it is suggested that specific and explicit reference to the marine environment, its biodiversity and flora and fauna is contained within the main body of text.</p> <p>3.6 Water</p>	<p>Noted. These issues will be considered by the assessment where relevant.</p> <p>To insert the following text into Section 1.4.4: "The SEA Environmental Report will provide information about any transboundary effects resulting from the implementation of the Strategy. Northern Ireland's Department of Agriculture, Environment and Rural Affairs Northern Ireland will be circulated the Strategy and associated documents and offered an opportunity to comment."</p> <p>To identify in the SEA Scoping Report under the relevant sections that the environment encompasses the marine environment.</p> <p>To include reference to seascape.</p> <p>The cited plans/programmes will be used by the assessment and referenced in the SEA Environmental Report.</p>

	<p>As above, it is suggested that further explicit reference should be contained here to directly reference the marine environment. References to WFD are welcome in this section. However, this section should include reference to the UK Marine Strategy and achievement of good environmental status, particularly in relation to those elements of the UK Marine Strategy not covered by WFD, such as, concentrations and effects of contaminants to the wider marine environment.</p> <p>3.8 Material Assets While we note the footnote to clarify water includes transitional and coastal, it is suggested specific reference be made to potential future material assets in the marine environment. This would highlight the future potential for offshore renewable energy development and generation that may likely be required to meet decarbonising targets.</p> <p>3.9.1 Archaeological Heritage The reference to coastal marine archaeology is noted and welcomed.</p> <p>3.10 Landscape This section should include reference to seascape, to make it clear that seascape will be included. We suggest that reference to Seascape Character Areas (SCAs) is also included within the future Baseline.</p> <p>4.3 Relationship with other plans and programmes Given the significant importance of the marine environment to the tourism offer around the coastline of both the ROI and NI, it is suggested that this section should contain a reference to the Marine Act (Northern Ireland) 2013, the UK Marine Policy Statement (MPS) and the draft Marine Plan for Northern Ireland. The UK Marine Policy Statement 2011 and the draft Marine Plan for Northern Ireland published in April 2018 are both available on the DAERA website at: Marine planning Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk). In addition, it is also suggested that consideration should also be given to including the EU Maritime Spatial Planning Directive and the Marine and Coastal Access Act 2009. Reference to the ROI National Marine Planning Framework (NMPPF) which was published last year would also be considered beneficial. We hope the supplied comments are useful to Fáilte Ireland as you seek to progress the SEA process for the Strategic Environmental Assessment Draft Scoping Report for the Regional Tourism Strategies 2022-2026. We would reiterate that by not including relevant marine aspects (as outlined in the UK Marine Policy Statement) within these iterative documents, then it appears that the opportunities for the marine area and potential transboundary issues have not been considered as part of the legislative process.</p>	
8	<p>Marine Conservation and Reporting</p> <p>We note that the SEA Scoping Report does not include the consideration of some important climate change impacts such as coastal erosion, flooding and sea level rise. These issues should be considered in line with local, national and cross boundary policies to ensure plans and projects are future proof. These issues are particularly important when monitoring and assessing the impacts of plans and projects on protected habitats and species.</p> <p>In transboundary areas, the following policy should be considered:</p> <ul style="list-style-type: none"> • The UK Marine Policy Statement (MPS); • The Draft Marine Plan for Northern Ireland; • Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026. <p>Planning decisions (authorisations and enforcement) that affect or might affect the whole or any part of the Northern Ireland marine area, must be made in accordance with marine policy documents, unless relevant considerations indicate otherwise.</p> <p>The marine area includes the sea (below mean high water spring tide); and estuaries, rivers or channels so far as the tide flows at mean high water spring tide (tidal waters).</p> <p>We note that the SEA Scoping Report does not include the consideration of some important climate change impacts such as coastal erosion, flooding and sea level rise. These issues should be considered in line with local, national and cross boundary policies to ensure plans and projects are future proof. These issues are particularly important when monitoring and assessing the impacts of plans and projects on protected habitats and species.</p> <p>In transboundary areas, the following policy should be considered:</p> <ul style="list-style-type: none"> • The UK Marine Policy Statement (MPS); • The Draft Marine Plan for Northern Ireland; 	Noted. These issues will be considered by the assessment where relevant.

	<ul style="list-style-type: none"> • Integrated Coastal Zone Management Strategy for Northern Ireland 2006-2026. Planning decisions (authorisations and enforcement) that affect or might affect the whole or any part of the Northern Ireland marine area, must be made in accordance with marine policy documents, unless relevant considerations indicate otherwise. The marine area includes the sea (below mean high water spring tide); and estuaries, rivers or channels so far as the tide flows at mean high water spring tide (tidal waters). 	
Department of Housing, Local Government and Heritage		
1	<p>Nature Conservation</p> <p>This Department very much supports the approach Fáilte Ireland is adopting in undertaking SEA on the Dublin Regional Tourism Strategy 2022-2025 as set in the Draft SEA Draft Scoping Report for Regional Tourism Strategies 2022-2026. In this regard it notes in particular the integration of the preparation of the strategy itself and the SEA and Appropriate Assessment (AA) of the strategy. Also noted and welcomed is that it is intended the SEA will consider the potential effects of the strategy on the entire range of sites protected or proposed for protection because of their ecological significance including European sites, proposed Natural Heritage Areas (pNHAs), Ramsar sites, and Flora Protection Order sites amongst others, as well as 'stepping stones' and wildlife corridors which maintain ecological connections between the various designated sites, and non-designated habitats.</p>	Noted.
2	<p>Dublin City and County are lucky in still possessing many ecologically rich areas, particularly on their coastline, in the Liffey and Dodder Valleys, along the canals and in the Dublin Mountains. The high ecological value of habitats such as the intertidal mudflats and sand dune systems occurring in and around Dublin Bay and the Baldoyle, Malahide and Rogerstown Estuaries, and the large numbers of wildfowl and waders which winter in all these estuaries and the use of Dublin Bay by breeding and passage migrant terns has been recognised by the designation of much of their areas as either Special Areas of Conservation (SACs) and/ or Special Protection Areas (SPAs). Likewise the presence of biodiverse dry heath and vegetated sea cliff habitats on Howth Head and vegetated sea cliffs and perennial vegetation of stony banks on Ireland's Eye and seal breeding colonies on Lambay Island has led to their designation as SACs, and SPAs have been designated to protect nesting seabird colonies on the cliffs of Howth Head and on Ireland's Eye, Lambay and Rockabill and the use of Dalkey Island by migrating terns.</p> <p>The North Bull Island developed on former sand banks in Dublin bay in the 19th century as a result of changed sedimentary patterns in the bay caused by the development of port infrastructure. UNESCO recognised the island's scientific value for our understanding of the development of coastal sand dune systems and their associated plant and animal communities by designating it as a Biosphere Reserve in 1981. More recently this designation was extended in 2015 the greater part of Dublin Bay and surrounding areas from Baldoyle Estuary and Ireland's Eye in the north to Dalkey Island in the south, with the goal that the conservation of the high biodiversity value of the Dublin Bay area while fostering its sustainable economic development for tourism and other purposes would act as an international role model for the management of such an ecologically rich area immediately adjacent to a city. Fáilte Ireland is a member with the National Parks and Wildlife Service (NPWS) of this Department, Dublin City Council, Fingal and Dún Laoghaire-Rathdown County Councils and Dublin Port Company of the Dublin Bay Biosphere Partnership formed to manage the Biosphere Reserve. Fáilte Ireland's participation in this partnership will presumably be referred to in the Dublin Tourism Strategy and therefore should also be taken into account in its SEA.</p> <p>The Dublin Mountains can geographically be considered as forming an extension of the larger Wicklow Mountains area to the south and because of the occurrence of upland heathlands and blanket bogs, and bird species typical of these habitats such as merlin and red grouse, large sections of the Dublin Mountains are included in the Wicklow Uplands SAC and Wicklow Uplands SPA. Some of these areas have long been part of the Wicklow Mountains National Park (WMNP) managed by the NPWS of this Department, while in recent years circa 2,000 ha of the upland commonage in Glenasmole has been purchased and incorporated in the WMNP with the intention of managing their recreational use as preserving flora and fauna. Much of lower Glenasmole around the Dublin City Council managed Bohernabreena Reservoirs has on account of the diverse plant communities, especially those of tufa springs, found there, also been designated as the Glenasmole Valley SAC.</p> <p>The importance of the plant and animal communities of the riparian habitats and ancient woodland areas River Liffey Valley has led to the designation of it as a proposed Natural Heritage Area (pNHA). A large part of the valley is also</p>	<p>Noted. Fáilte Ireland's participation in Dublin Bay Biosphere Partnership will be referenced in the assessment and taken into account by the SEA.</p> <p>The SEA will assess the likely significant environmental effects of implementing Regional Strategy provisions, including those relating to biodiversity and flora and fauna. The AA will consider potential effects on the integrity of European sites. In addition to being considered as part of the SEA Scoping process, this submission will be considered by the ecologists undertaking the AA and preparing ecological monitoring elements.</p> <p>The SEA and AA team will work with the Strategy-preparation team at Fáilte Ireland in order to integrate requirements for environmental protection and management into the Strategy. Potentially significant adverse environmental effects arising from the Strategy will be mitigated by various provisions integrated into the Strategy, including those that have arisen through the SEA and AA processes.</p> <p>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.</p> <p>Implementing the Strategy will involve Fáilte Ireland helping to facilitate, promote, support and coordinate stakeholders (including local authorities, other government agencies, tourism operators, stakeholders and visitors) in their activities in a way that is consistent with existing and emerging plans that have been subject to environmental assessment. The Strategy will not</p>

	<p>the subject a Special Amenity Area Order, and a number of its woods are sites for a plant species, hairy St. John's-wort, protected under the Flora Protection Order. Similarly, the diversity of the aquatic biota of the Grand and Royal Canals and these water bodies' value as wildlife corridors has resulted in their designation as pNHAs.</p> <p>The great majority of the above mentioned coastal, Dublin Mountain, river valley and canal sites are highly used by Dublin residents for recreation, mainly walking, but in addition for angling, swimming and aquatic sports like canoeing, yachting and kite-surfing. Some of them too offer considerable attractions to tourists, and this tourist potential includes their wildlife. Close viewing of guillemots, puffins and gannets is possible at the colonies on Howth Head and Ireland's Eye, species which it is unlikely continental European visitors would be familiar with. Nor are they likely to be familiar with the seals observable in many coastal areas. In the Dublin Mountains too, the red grouse, a race confined to these islands of a species restricted elsewhere in Europe largely to Scandinavia, should be an attraction for continental birders. The Dublin Regional Tourism Strategy should note these tourist opportunities.</p> <p>However, even before the covid pandemic sections of at least one coastal site, the East Mountain and northern cliff-line of Howth Head SAC (partially also a SPA), because of the popularity with both Dubliners and tourists of the 'Cliff Walk' appeared to have reached their carrying capacity to cater for visitors without damaging the heath and vegetated cliff habitats present in the SAC. In addition, anecdotal evidence from managers of other coastal sites would suggest that the greatly increased footfall during covid may have resulted in the damage sensitive habitats such as embryonic dunes through increased erosion effects.</p> <p>In the light of such potential problems arising from recreational usage by tourists and locals of ecologically sensitive coastal and other areas, the extension by Fáilte Ireland of the monitoring program it has maintained of sites along the Wild Atlantic Way to a further 19 sites across Ireland from 2021-2025 referred to in the SEA Draft Scoping Report is welcomed. It is not stated which sites in the Dublin region have been selected for further monitoring, but the observational and ecological assessments proposed could provide further valuable data on the impacts of tourists and other recreational users on ecologically sensitive sites in the Dublin area, such as Howth Head, Ireland's Eye and North Bull Island. If these sites are not included in Fáilte Ireland's extended monitoring program, it is recommended it should be extended further to include them. It is stated in the Draft Scoping Report that the findings of the Monitoring Program on the Wild Atlantic Way are circulated to the relevant local authorities; it would be desirable as well that the results of any Fáilte Ireland monitoring of ecologically sensitive areas were made available to the NPWS.</p>	<p>provide consent, establish a framework for granting consent or contribute towards a framework for granting consent.</p> <p>The Strategy is 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. have been subject to their own environmental assessment processes, as relevant, and form the decision-making and consent-granting framework.</p> <p>Implementation of the Strategy shall be consistent with and conform with the NPF, 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 the Strategy (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 Strategy is not part and does not contribute towards.</p> <p>The previous WAW Monitoring Programme involved an environmental monitoring steering group including the National Parks and Wildlife Service. All monitoring reports from this programme can be viewed at https://www.failteireland.ie/Regional-experience-brands/Wild-Atlantic-Way/The-Wild-Atlantic-Way-Operational-Programme/Environmental-Surveying-and-Monitoring-Programme.aspx</p> <p>Fáilte Ireland are now embarking on a new National Environmental Monitoring Programme involving nineteen sites (including Malahide/Dublin Bay) and will be in contact with stakeholders in due course to disseminate and discuss the results of this work.</p>
3	<p>This Department would also recommend that the guidance Fáilte Ireland is currently preparing in relation to the Wild Atlantic Way championing the concept of 'keeping it wild' should be supplied to managers of European sites and other sites designated for nature conservation frequented by tourists in the Dublin area. Likewise, the guidelines it is preparing to facilitate identification and understanding of habitats present at nature based tourist destinations should be circulated as soon as they become available to site managers in the Dublin region.</p>	<p>Noted. Any mitigating provisions under the Strategy will be made available by Fáilte Ireland to such site managers.</p>
4	<p>In considering the effects of the tourism strategy on, in the terms of Article 10 of the Habitats Directive " Such features which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking field boundaries) or their function as stepping stones are essential for the migration, dispersal and genetic exchange of wild species." in the Dublin region, SEA should take into account the possible effects on wildlife corridors including plants and animals occurring in designated sites, of the network of greenway cycle/ walking routes being rolled out or proposed for the Dodder, Liffey and Tolka River Valleys and smaller streams</p>	<p>Article 10 of the Habitats Directive, ecological corridors and greenways will be issues that will be considered by the Strategy and associated SEA and AA as relevant.</p> <p>The SEA and AA team will work with the Strategy-preparation team at Fáilte Ireland in order to integrate requirements for</p>

	<p>and along the Grand and Royal Canals, a network that is in part being laid out to promote tourism. In practice, to some extent due the insistence by the NTA on generous minimum widths for greenways and the desire by local authorities to install lighting on these routes, but often because the green corridors along rivers and canals are often very narrow, it has proven very difficult to lay out greenways along wildlife corridors such as the Dodder and Tolka Rivers and the Grand and Royal Canals without causing potentially significant detrimental effects on fauna such as rare plant species, bat species or otter. Consideration of the potential effects of greenways on flora and fauna is also required because further such cycle ways/ footpaths are planned to run through ecologically sensitive coastal areas, including for instance the Fingal Coastal Way, which is to run from Malahide to Newbridge House, across the Rogerstown Estuary to Rush, and via Skerries and Balbriggan to the Meath County boundary at Gormanstown.</p>	<p>environmental protection and management into the Strategy. Potentially significant adverse environmental effects arising from the Strategy will be mitigated by various provisions integrated into the Strategy, including those that have arisen through the SEA and AA processes.</p> <p>FI have committed to producing "<i>Sustainable Recreational Trail Development Guidelines</i>" in 2023.</p>
5	<p>With the expansion of the tourist industry in the last decade many 19th and 20th century in central Dublin have been demolished to facilitate the construction of new hotels. Other buildings have been renovated to provide new or upgraded tourist accommodation. Over the same time period swift numbers have declined severely in the same parts of the city, and it is thought this decline is mainly due to the loss of nest sites as a result of the demolition or renovation of buildings, which the swifts because of their faithfulness to old nest sites find it difficult to adapt to. While the tourist industry would only account for a minority of the losses and renovations of older buildings in Dublin in recent years, it is likely it is contributing to the swift's decline, and the issue should therefore be addressed in the SEA. Mitigation measures could include the survey of buildings proposed for removal or renovation for swift nest sites and their preservation where possible, and the installation of swift nest boxes in new hotel buildings.</p> <p>The growth of the tourist and related hospitality industries in Dublin has in addition probably contributed to an increase roof nesting by herring and lesser black-backed gulls, particularly in the central part of the city, because of an associated increased availability of food scraps for the gulls to scavenge. Gull roof nesting is often seen as a public nuisance and the tourist industry's contribution to it should therefore be referred to in a SEA of the new Dublin Regional Tourism Strategy.</p>	<p>Noted. The SEA will assess the likely significant environmental effects of implementing Regional Strategy provisions, including those relating to biodiversity and flora and fauna and human health. The AA will consider potential effects on the integrity of European sites.</p> <p>The SEA and AA team will work with the Strategy-preparation team at Fáilte Ireland in order to integrate requirements for environmental protection and management into the Strategy. Potentially significant adverse environmental effects arising from the Strategy will be mitigated by various provisions integrated into the Strategy, including those that have arisen through the SEA and AA processes.</p>
7	<p>Finally it is noted the Draft SEA Scoping Report does not reference the National Biodiversity Action Plan. We would draw your attention to Objective 1.1.3 of the NDP which is that "All public Authorities and private sector bodies move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure". As the NDP is a national plan we recommend this objective is incorporated into the SEA.</p>	<p>The SEA Scoping Report will be updated with a specific reference to the National Biodiversity Action Plan.</p> <p>Objective 1.1.3 of the NDP will be incorporated into SEA recommendations for integration into the Strategy.</p>