

SEA STATEMENT

FOR THE

LIMERICK DESTINATION EXPERIENCE DEVELOPMENT PLAN

STRATEGIC ENVIRONMENTAL ASSESSMENT

for: Fáilte Ireland
88-95 Amiens Street
Dublin 1



by: CAAS Ltd.
1st Floor
24-26 Ormond Quay Upper
Dublin 7



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Section 1 Introduction

1.1 Introduction and Legislative Context

This is the Strategic Environmental Assessment (SEA) Statement for the SEA Statement for the Limerick Destination Experience Development Plan (hereafter referred to as 'the Plan' or 'DEDP').

SEA is a systematic process of predicting and evaluating the likely environmental effects of implementing a plan, or other strategic action, in order to ensure that these effects are appropriately addressed at the earliest appropriate stage of decision-making on a par with economic and social 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 that 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 Plan (referred to as an SEA Statement).

The SEA Statement is required to include information summarising:

- a) how environmental considerations have been integrated into the Plan;
- b) how the following have been taken into account during the preparation of the Plan:
 - the environmental report,
 - submissions and observations made on the Draft Plan and Environmental Report, and
 - any transboundary consultations.
- c) the reasons for choosing the Plan in the light of the other reasonable alternatives dealt with; and
- d) the measures decided upon to monitor the significant environmental effects of implementation of the Plan.

1.3 Implications of SEA for the Plan

SEA has been undertaken on the Plan and the findings of the SEA are expressed in an Environmental Report, the first published version of which accompanied the Draft Plan on public display. The Environmental Report was updated in order to take account of non-material changes that were made to the original Draft Plan on foot of submissions following public display.

Fáilte Ireland have taken into account the findings of the SEA Environmental Report and other related SEA output during their consideration of the Draft Plan and before its adoption. This SEA Statement, summarising how environmental considerations have been integrated into the Plan, has been prepared at the end of the process.

Section 2 How Environmental Considerations were integrated into the Plan

2.1 Introduction

Environmental considerations were integrated into the Plan through:

1. Establishing the status of the Plan 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 Plan.

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

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

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

The Plan 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 to be implemented through Regional Spatial and Economic Strategies (RSEs) and lower tier Development Plans and Local Area Plans. The RSEs for the Southern Region (the area to which the Plan relates is located within this Region) sets out objectives relating tourism development, that have been subject to environmental assessment, including those relating to: enhancing provision of tourism and leisure amenity; promoting tourism activity; developing a road network and public transport services, facilitating improved visitor access and longer dwell times; developing walking and cycling trails, opening greater accessibility to the marine and countryside environment by sustainable modes; and facilitating appropriate tourism development, including that relating to greenways, blueways and peatlands. The RSEs will inform the review of existing, assessed lower-tier Development Plans and Local Area Plans, which already include various provisions relating to land use, tourism and infrastructure. Such reviews will also be subject to environmental assessments.

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

Figure 2.1 provides a schematic of the relationship between the Plan and the existing Statutory Decision-Making and Consent-Granting Framework. Also indicated is the hierarchy of accompanying environmental assessment in force.

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 Plan 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 Plan-preparation/SEA process, Fáilte Ireland considered three alternatives for the Plan. 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 Plan before it was placed on public display. Individual sensitivities which were

mapped by the SEA and considered by the Team preparing the Plan included the following:

- European sites
- Other ecological designations
- WFD surface water status
- Groundwater vulnerability
- WFD Register of Protected Areas
- Land cover mapping
- Infrastructure capacity
- Green infrastructure and ecosystem services
- Archaeological and architectural heritage
- Landscape designations

2.5.2 Appropriate Assessment

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

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

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

2.6 Integrating Requirements for Environmental Protection and Management into the Plan

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

In order to achieve funding (including promotion) for land use or infrastructural development or land use activities from Fáilte Ireland, Fáilte Ireland's stakeholders shall be

required to demonstrate compliance¹ with measures relating to sustainable development, environmental protection and environmental management contained within the following Fáilte Ireland published documents:

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

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

- Requirements for lower-tier environmental assessment, including EIA and AA;
- Statutory land use plans that form part of the statutory decision-making and consent-granting framework (e.g. Development Plans, such as Limerick Development Plan 2022-2028) and that have undergone environmental assessment, as appropriate, including various provisions relating to sustainable development, environmental protection and environmental management²; and
- The Climate Action Plan 2023 and the National Climate Change Adaptation Framework (2018 and any subsequent versions)³.

Infrastructure Capacity⁴

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.

Visitor Management⁵

Those receiving funding 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 will be required for proposed plans, programmes and projects that are to receive funding as relevant and appropriate.

Green Infrastructure and Ecosystem Services⁶

Those receiving funding 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.

¹ Demonstration of compliance may be supported by monitoring undertaken by the beneficiary.

² For more information please refer to Appendix II of this report or the website of the relevant public authority.

³ For more information please refer to Section 4.10 and/or Appendix II of this report or the website of the relevant public authority.

⁴ This requirement has arisen through the SEA and/or AA processes.

⁵ This requirement has arisen through the SEA and/or AA processes.

⁶ This requirement has arisen through the SEA and/or AA processes.

Statutory Decision-Making and Consent-Granting Framework

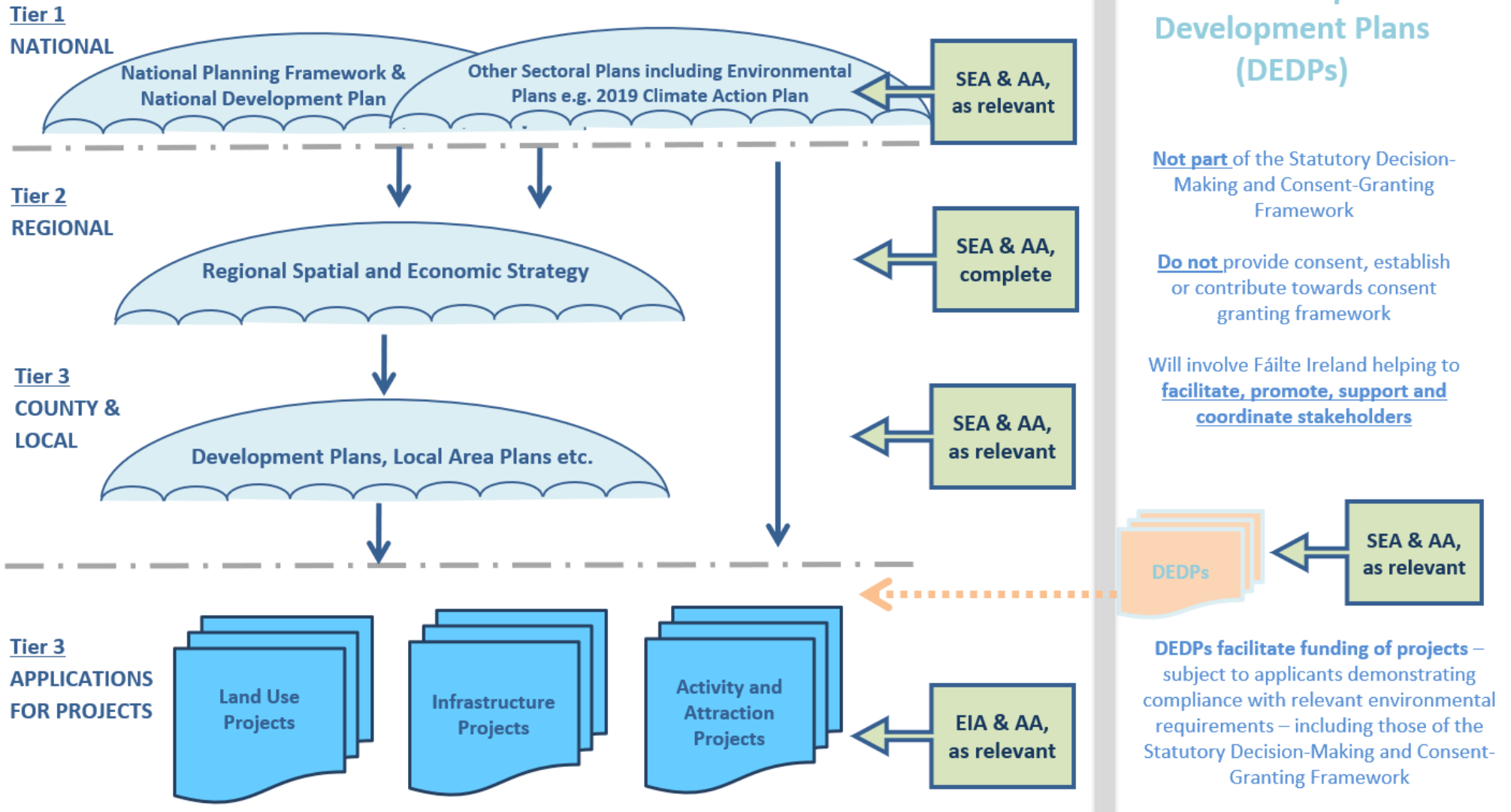


Figure 2.1 Statutory Decision-Making and Consent-Granting Framework, Limerick DEDP and Environmental Assessment Requirements

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 Plan and the SEA.

3.2 SEA Scoping Submissions

Submissions from the following environmental authorities were made during the SEA Scoping process: Environmental Protection Agency; Department of Communication, Climate Action and Environment; and Department of Culture, Heritage and the Gaeltacht.

The EPA's submission provided information under the headings below that were addressed in the SEA/AA and/or the Plan, including:

- Sustainable Development Goals & Key Actions for Ireland
- Scope of the SEA
- Data and Knowledge Gaps
- Community Engagement
- Climate Action
- Traffic Management
- Water Quality
- Infrastructure-related Considerations
- Biodiversity
- Ecosystem Services and Green Infrastructure
- Invasive Alien Species Control and Management
- Landscape
- Assessment of Environmental Effects
- Alternatives
- Monitoring, Review and Reporting
- Integration with other key Plans and Programmes
- Available Guidance & Resources
- Environmental Sensitivity Mapping (ESM) Webtool
- EPA SEA WebGIS Tool
- EPA WFD Application
- EPA AA GeoTool
- State of the Environment Report – Ireland's Environment 2016
- Environmental Authorities

The Department of Communication, Climate Action and Environment's submission provided information under the headings below that were addressed in the SEA/AA and/or the Plan, including:

- Geoheritage

- Geotourism
- Dimension Stone/Stone Built Ireland

The Department of Culture, Heritage and the Gaeltacht's submission provided information under the heading "Underwater Archaeology" that was addressed in the SEA/AA and/or the Plan.

3.3 Submissions on the Environmental Report and Draft Plan

Various submissions were made on the Draft Plan 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 Plan and consequently did not necessitate further, detailed SEA consideration.

Updates to the Draft Plan did not provide for any uses, works or activities additional to those already provided for by the original Draft Plan that would present additional sources. Consequently, they did not require further, detailed SEA or AA consideration.

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

- Under the environmental chapter in the Plan: "Content of this chapter has been integrated through the SEA, AA and the Plan preparation process. Recommendations integrated include those under the headings of: "Sustainable and Responsible Tourism"; "Implementation and Consent"; and "Integrating Requirements for Environmental Protection and Management".
- Under the environmental chapter in the Plan: "The above principles will be implemented through progression of the Plan including the action plan set out in Section 5.4 and monitored through the proposed SEA monitoring programme."
- Under the environmental chapter in the Plan: "Develop effective management, protection & promotion of the environment, including natural, cultural and heritage assets through the following: SEA Environmental Monitoring Programme (reference Chapter 10 of SEA Environmental Report); Guiding Principles for Sustainable & Responsible Tourism (refer to Section 5.3)".

- Addition of references in the Plan to National Planning Framework, Southern Regional Spatial and Economic Strategy and the Shannon Integrated Framework Plan (SIFP) and to also including Figure 4.1 of the SEA ER in the Plan and inclusion of clarification/definition on reference to "MICE".
- Including Table 10.1 from the SEA ER under the environmental considerations chapter in the Plan.
- Under the environmental considerations chapter in the Plan replacing the existing paragraph with the following text:

"Environmental Assessment

Consideration has been given to the requirement to undertake environmental assessment of this Plan in order to ensure full legal compliance and to further integrate protection, enhancement and promotion of the environment in developing and implementing the Plan. The following sets out the two types of environmental assessments that were considered.

1. Strategic Environmental Assessment (SEA)

The Plan was examined for the need to undertake Strategic Environmental Assessment (SEA). On initial examination of the Plan it was determined that full SEA would be required. The assessment process was completed having full regard to SEA Directive 2001/42/EU and to Statutory Instrument No. 435/2004 as amended. The outcome of this process can be referenced in the relevant environmental documents that accompany this Plan.

2. Appropriate Assessment (AA)

The Plan was examined for the need to undertake Appropriate Assessment (AA). On initial examination of the Plan and in completing screening for AA, it was determined that Stage 2 AA would be required. The assessment process was undertaken having full regard to the Habitats Directive 92/43/EEC and to Statutory Instrument No. 477/2011. The output and outcome of this process can be referenced in the relevant environmental documents that accompany this Plan.

Key findings of the SEA and AA Process for the Plan.

Having completed full SEA and AA on the Limerick DEDP it is evident that these processes have had a positive influence on the evolution of the Plan and will also continue to have a positive environmental influence as the Plan enters its implementation phase. The outcome of completing the above environmental assessments has resulted in the following;

- *Identifying and mitigating where relevant potential environmental impacts resulting from the Plan.*
- *Identifying relevant positive environmental impacts arising from the Plan and ensuring the implementation of actions that result in environmental protection, enhancement and promotion e. g. visitor management actions, environmental and sustainable education.*
- *Developing a suite of mitigatory actions to ensure that any negative environmental impacts are reduced or eliminated at Plan implementation stage.*

This suite of mitigatory actions includes:

- *The requirement to establish the status of the Plan and its interrelationship with Statutory*

Decision making and consent-granting frameworks,

- *Integrating the requirements for Environmental Compliance into the Plan. Particular emphasis is placed on the following:*
 - *Requirements for lower-tier environmental assessment,*
 - *The Limerick Development Plan 2022-2028*
 - *The Climate Action Plan 2023*
 - *Visitor management*
 - *Consideration for infrastructural capacity and green infrastructure, and*
 - *Eco-system services*

Development and execution of an Environmental Monitoring Programme for the Plan during implementation and operation.

- *The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. Section A5a details the measures that have been selected in order to monitor the likely significant effects of implementing this Plan.*
- *Monitoring can demonstrate the positive effects facilitated by the Plan 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 Plan and a possible review of part(s) of the Plan.*
- *Environmental monitoring will be based around indicators that allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives.*
- *A variety of sources of information will be used to run the programme.*

Environmental Monitoring will be executed by Fáilte Ireland and will run concurrent with the implementation phase of the Plan itself. It will be reported on to the Strategies implementation group on an annual basis where relevant information sources allow, and the findings of the monitoring will influence the actions of the Plan as it progresses. The monitoring will be linked directly to the Plan KPI's, including monitoring of visitor numbers where relevant.

Environmental monitoring for the Plan and other existing/future Fáilte Ireland plans, programmes, etc. may be undertaken and reported on at the same time."

The SEA Environmental Report was updated by:

- Under "Appendix II Relationship with Legislation and Other Plans and Programmes":
 - Updating the reference to the "Planning, Land Use and Transport Outlook 2040" to reflect its new title "The National Investment Framework for Transport in Ireland".
 - Updating the reference to the "National Hazardous Waste Management Plan

- 2014-2020” to reflect the next iteration of this plan.
- Replacing reference to the “Food Harvest 2020” with “Food Wise 2025” and the “Agri-Food Strategy 2030”.
- Updating the reference to the “River Basin Management Plan” to reflect the latest (3rd) cycle of the River Basin Management Plan.
- Adding a new reference to the “Tourism Masterplan for the Shannon (Waterways Ireland)”.
- Adding a new reference to the “Climate Action and Low Carbon Development (Amendment) Bill 2021”.
- Adding a new reference to the “National Marine Planning Framework”.
- Updating the SEO in Section 8, Table 8.1 as follows (new text **in bold**): “AC1: To contribute towards: climate adaptation and mitigation; **and air quality and noise and management objectives.**”
- Removing references to “Peninsula” in Section 7, Table 7.4.

3.4 SEA documents including the SEA Environmental Report

The Draft Plan 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 Plan 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 Plan and before the Plan was adopted.

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

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

4.1 Description of Alternatives

Alternative 1: Current Situation (Business as Usual)

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

- Quality of built heritage throughout the City.
- Riverside position and quality of riverside public realm.
- Existence of strong city districts that bring visitors through the Limerick historical journey e.g. King's Island and Georgian District.
- Connected and compact nature of the core of the City.
- Depth of County wide tourism experiences from unique heritage and cultural to best in class outdoor experiences.
- International City profiling through sports event hosting.
- International success as location for foreign direct investment and quality economic destination.
- Development of new destination brand model.
- Range of cultural provision from visual to performing arts.
- Internationally acclaimed art events and home to international School of Art and Design.
- Quality of food offerings, food heritage and diversity of dining options.
- Range of established festivals and events.
- Uniqueness of City centre sites e.g. Milk Market and capacity for multi-purpose use.
- Third level colleges, student vibrancy and new UL City centre location.
- Range and quality of accommodation base in the City.
- Proven capacity to attract and host major events and conferences.

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

- Lack of cooperative approach to achieve the tourism potential of Limerick City in contrast to other economic sectors.
- Limited access to saleable local experiences that communicate the authenticity and uniqueness of Limerick City.
- Quality of current visitor orientation, signage and wayfinding for visitors to the City is poor.
- Dominance of business tourism in current occupancy levels achieved by city accommodation providers i.e. occupancy dominated midweek by the business sector.
- Limerick not perceived as a leisure tourism destination.
- Lack of programming by international tour operators.
- City centre retail experience is being challenged by city suburb shopping outlets reducing footfall and city centre vibrancy.
- Limited evening economy provision and lack of non-alcoholic entertainment options in the evening and current scale of evening economy provision.
- Limited focus on fostering tourism entrepreneurs and small businesses with tourism appeal.
- Absence of significant levels of footfall in the City centre outside of peak business period.
- Limited number of businesses open in the City centre in the evening that will generate footfall.
- City centre and other districts are not leveraging the existing visitor attraction numbers to King's Island to disperse visitors throughout the City.
- No sustained inputting to a centralised Limerick calendar of events to communicate to potential visitors.
- Limited access to artisan produce telling the Limerick story.
- Lack of a co-ordinated destination narrative being communicated on a sustained basis.
- Strong cultural themes such as arts not being maximised to allow the visitor engage in a variety of art experiences despite the existence of the internationally acclaimed School of Art and Design.
- Industry collaboration to co-create experiences that will increase destination dwell time.
- Urban adventure activities limited around the use of the river.
- Recognition among wider ancillary services of opportunity tourism provides e.g. retail, food and beverage.
- Limerick hotels are largely programmed by tour operators for only one night stays.

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

- Fáilte Ireland Strategic Plan
- People, Place and Policy: Growing Tourism to 2025 Department of Transport, Tourism and Sport
- Limerick 2030 – An Economic and Spatial Plan for Limerick
- Limerick Tourism Development Strategy and Action Plan 2019 – 2023
- Limerick Development Plan 2022-2028
- Limerick City and County Heritage Plan 2017 – 2030
- National Planning Framework
- Southern Regional Spatial and Economic Strategy
- Wild Atlantic Way Regional Tourism Development Strategy

This current situation presents **Alternative 1 (Business as Usual)** to be considered by the SEA. Overtime, numbers of visitors would continue to increase under this scenario – consistent with the development of tourism over many decades.

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

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

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

Under Alternative 2 there are two separate alternatives:

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

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

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

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

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

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

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

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.

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

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

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

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

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

In addition to the measures relating to sustainable development, environmental protection, environmental management (and associated effects), which are provided under all alternatives, and measures relating to seasonality and regionality, provided for by this alternative and Alternative 2B, this alternative would provide additional requirements for environmental protection and management, including those taken from the Wild Atlantic Way Operational Programme and those relating to infrastructure capacity, visitor management and green infrastructure and ecosystem services. In order to be realised, projects included in the Plan (in a similar way to other projects from any other sector) would have to demonstrate compliance, as relevant, with various provisions of legislation, policies, plans and programmes that form the statutory decision-making and consent-granting framework, of which the Plan is not part and does not contribute towards.

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

Although a Plan would help to improve the seasonal and geographic spread of visitors, a Plan's objective would be to increase the number of visitors to the Limerick City area. Although this would be likely to happen without a Plan, a Plan would have the potential to increase numbers of tourists – and associated potential adverse effects – to a greater degree than would be the case if there was no Plan. This would be likely to contribute towards in an increase in travel related greenhouse gas and other emissions to air, including from aviation. These increases will be mitigated by provisions that have been integrated into the Plan, including those relating to sustainable mobility and compliance with the Climate Action Plan 2023, the National Climate Change Adaptation Framework (2018 and any subsequent versions).

A Plan would also help to promote new experiences – including those relating to land use activities and developments. These would also have the potential to increase adverse effects. Notwithstanding this, there would be three layers of mitigation, through:

- The existing statutory planning and consent framework;
- Visitor management strategies; and
- Additional environmental requirements for environmental protection and management, under this alternative.

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

In addition to the measures relating to sustainable development, environmental management and environmental protection (and associated effects), which are provided under all alternatives, this Alternative (2B) would provide measures to improve seasonality and regionality. Seasonality and regionality would provide a greater spread of tourists throughout the year and across the Limerick City area thereby reducing potential environmental effects and peak load additions on various infrastructure in particular locations/at particular times.

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

Although a Plan would help to improve the seasonal and geographic spread of visitors, a Plan’s objective would be to increase the number of visitors to the Limerick City area. Although this would be likely to happen without a Plan, a Plan would have the potential to increase numbers of tourists – and associated potential adverse effects – to a greater degree than would be the case if there was no Plan.

This would be likely to contribute towards an increase in travel related greenhouse gas and other emissions to air, including from aviation. These increases would be mitigated by the wider planning framework.

A Plan would also help to promote new experiences – including those relating to land use activities and developments. These would also have the potential to increase adverse effects. Notwithstanding this, there would be one layer of mitigation, through the existing statutory planning and consent framework.

Table 4.1 below provides a comparative evaluation of alternatives against SEOs.

Table 4.1 Comparative Evaluation of Alternatives against SEOs

	Likely to Improve status of SEOs			Potential Conflict with status of SEOs - likely to be mitigated by complying with other measures included within the Plan		Probable Conflict with status of SEOs- unlikely to be fully mitigated
	to the Greatest degree	to Moderate degree ^a	to a Lesser degree	to a Moderate degree	to a Greater degree	
Alternative 1: Business as Usual			✓		✓	
Alternative 2A: A Plan with Additional Requirements for Environmental Protection and Management	✓			✓		
Alternative 2B: A Plan without Additional Requirements for Environmental Protection and Management		✓			✓	

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

Taking into account the environmental effects detailed above and the challenges and opportunities present for tourism across the Limerick City area, Fáilte Ireland have proceeded with Alternative 2A "A Plan with Additional Requirements for Environmental Protection and Management".

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). Monitoring can demonstrate the positive effects facilitated by the Plan 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 Plan and a possible review of part(s) of the Plan.

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 the 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.

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

Confirmation of compliance with relevant environmental measures integrated into the Plan 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 Fáilte Ireland environmental monitoring programmes (and any subsequent replacements), including the Monitoring Programme for the Wild Atlantic Way, a sub-programme of which will be extended to/reported on for the **Limerick – DEDP** area in order to monitor any effects of visitors (see Section 4.6.3);
- Sources maintained by **Limerick City and County Council** (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.

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 Plan 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	Indicators	Targets	Source and (where available) Frequency
Biodiversity, Flora and Fauna	B1: Conservation status of habitats and species as assessed under Article 17 of the Habitats Directive	B1: Maintenance of favourable conservation status for all habitats and species protected under National and International legislation to be unaffected by implementation of the Plan ⁷	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" • Lower tier 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) • Government report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every 6 years) • Government National Monitoring Report for the Birds Directive under Article 12 (every 3 years) • Consultations with the NPWS • CORINE mapping resurvey (every c. 5 years) • Input from any other existing or replacement Fáilte Ireland monitoring programmes
	B2: Percentage loss of functional connectivity without remediation resulting from the Plan	B2: No significant ecological networks or parts thereof which provide functional connectivity to be lost without remediation resulting from the Plan	
	B3i: Number of significant impacts on relevant habitats, species, environmental features or other sustaining resources in designated sites including Wildlife Sites resulting from the Plan	B3i: Avoid significant impacts on relevant habitats, species, environmental features or other sustaining resources in designated sites including Wildlife Sites resulting from the Plan	
	B3ii: Number of significant impacts on the protection of listed species	B3ii: No significant impacts on the protection of listed species resulting from the Plan	
Population and Human Health	PHH1: Occurrence (any) of a spatially concentrated deterioration in human health arising from environmental factors resulting from the Plan, as identified by the Health Service Executive and Environmental Protection Agency	PHH1: No spatial concentrations of health problems arising from environmental factors as a result the Plan	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" • Lower tier 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) • Consultations with the HSE and EPA • Input from any other existing or replacement Fáilte Ireland monitoring programmes
Soil	S1: Artificial surfaces land cover extent	S1: Contribute towards the target of the National Planning Framework's SEA (2018) to "Maintain built surface cover nationally to below the EU average of 4%."	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" • Lower tier 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) • CORINE mapping resurvey (every c. 5 years) • Input from any other existing or replacement Fáilte Ireland monitoring programmes
Water	W1i: Classification of Overall Status (comprised of ecological and chemical status) under the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272 of 2009)	W1i: No deterioration in the status of any surface water or adverse effect upon the ability of any surface water to achieve 'good status' as a result of the Plan	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" • Lower tier environmental assessment and decision making by local authorities • Data issued under the Water Framework Directive Monitoring Programme for Ireland (multi-annual) • 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 or replacement Fáilte Ireland monitoring programmes
	W2: Interactions with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC resulting from development adhering to the Plan	W2: Not to affect the ability of groundwaters to comply with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC, subject to exemptions provided for by Article 4 of the WFD	
	W3: Compliance of relevant lower tier assessments and decision making with the Flood Risk Management Guidelines	W3: For lower tier assessments and decision making to comply with the Flood Risk Management Guidelines	

⁷ 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 programme to proceed; and (c) Adequate compensatory measures in place.

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Environmental Component	Indicators	Targets	Source and (where available) Frequency
Air and Climatic Factors	AC1: Demonstration of compliance with provisions relating to climate adaptation and mitigation have been integrated into the Plan	C1: To maximise the amount of measures relating to climate adaptation and mitigation being implemented	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" • Lower tier 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) • <u>Input from any other existing or replacement Fáilte Ireland monitoring programmes</u>
Material Assets	M1: Number of instances whereby additional tourists are directed by beneficiaries of funding towards areas in the Plan area where adequate and appropriate critical infrastructure with sufficient capacity is unavailable	M1: No instances whereby additional tourists are directed by beneficiaries of funding towards areas in the Plan area where adequate and appropriate critical infrastructure with sufficient capacity that does not present a danger to human health are unavailable	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" • Lower tier 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) • Consultations with the partners such as the EPA, Uisce Éireann and/or Limerick City and County Council • <u>Input from any other existing or replacement Fáilte Ireland monitoring programmes</u>
	M2: Number of significant adverse effects on the use of or access to public assets and infrastructure	M2: No significant adverse effects on the use of or access to public assets and infrastructure	
	M3: Preparation and implementation of construction and environmental management plans	M3: For construction and environmental management plans to be prepared and implemented for relevant projects	
Cultural Heritage	CH1: Percentage of entries to the Record of Monuments and Places protected from significant adverse effects arising from the Plan	CH1: No unauthorised adverse effects on archaeological heritage resulting from implementation of the Plan	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" • Lower tier 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) • <u>Input from any other existing or replacement Fáilte Ireland monitoring programmes</u>
	CH2: Percentage of entries to the Records of Protected Structures and Architectural Conservation Areas and their context protected from significant adverse effects arising from the Plan	CH2: No unauthorised adverse effects on architectural heritage resulting from implementation of the Plan	
Landscape	L1: Number of unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in the Development Plans and other statutory land-use plans	L1: No unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in the Development Plans and other statutory land-use plans	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" • Lower tier 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) • <u>Input from any other existing or replacement Fáilte Ireland monitoring programmes</u>