

SEA STATEMENT

FOR THE

THREE PENINSULAS VISITOR EXPERIENCE DEVELOPMENT PLAN

STRATEGIC ENVIRONMENTAL ASSESSMENT

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Section 1 Introduction

1.1 Introduction and Legislative Context

This is the Strategic Environmental Assessment (SEA) Statement for the Three Peninsulas Visitor Experience Development Plan.

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 (SI No. 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI 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 (SI No. 200 of 2011) and the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (SI 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 VEDP 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 VEDP does not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent.**

The VEDP 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 for the next 22 years. The NPF is to be implemented through Regional Spatial and Economic Strategies (RSEs) and lower tier Development Plans and Local Area Plans. The RSE for the Southern Region (that includes the area to which the VEDP relates) sets out objectives relating to 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 RSE is informing 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 VEDP shall be consistent with and conform with the NPF, RSE 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 VEDP (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 VEDP is not part and does not contribute towards.

Figure 2.1 provides a schematic of the relationship between Visitor Experience Development Plans 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 identified by the SEA and considered by the Team preparing the Plan included those relating to:

- 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 Plan¹

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

Guiding Principles for Sustainable & Responsible Tourism identified by the Plan as being key to the success of integrated into the Plan include:

- Increase and promote environmental protection and enhancement when progressing actions derived from this plan;
- Fáilte Ireland will follow national planning framework guidelines and liaise with relevant planning authorities to ensure any proposed developments are adequately provided for in terms of critical service infrastructure; and
- Advocate for the protection of key environmental and tourism assets.

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

¹ These requirements include those that have arisen through the SEA and/or AA processes.

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 compliance² 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 VEDP (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 framework³, of which the VEDP 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;
- The Kerry and Cork County Development Plans, including various provisions relating to sustainable development, environmental protection and environmental management; and
- The Climate Action Plan 2019, the National Climate Change Adaptation Framework (2018 and any subsequent versions) and the National Mitigation Plan (2017 and any subsequent versions).

² Demonstration of compliance may be supported by monitoring undertaken by the beneficiary.

³ This framework includes various environmental requirements.

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.

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.

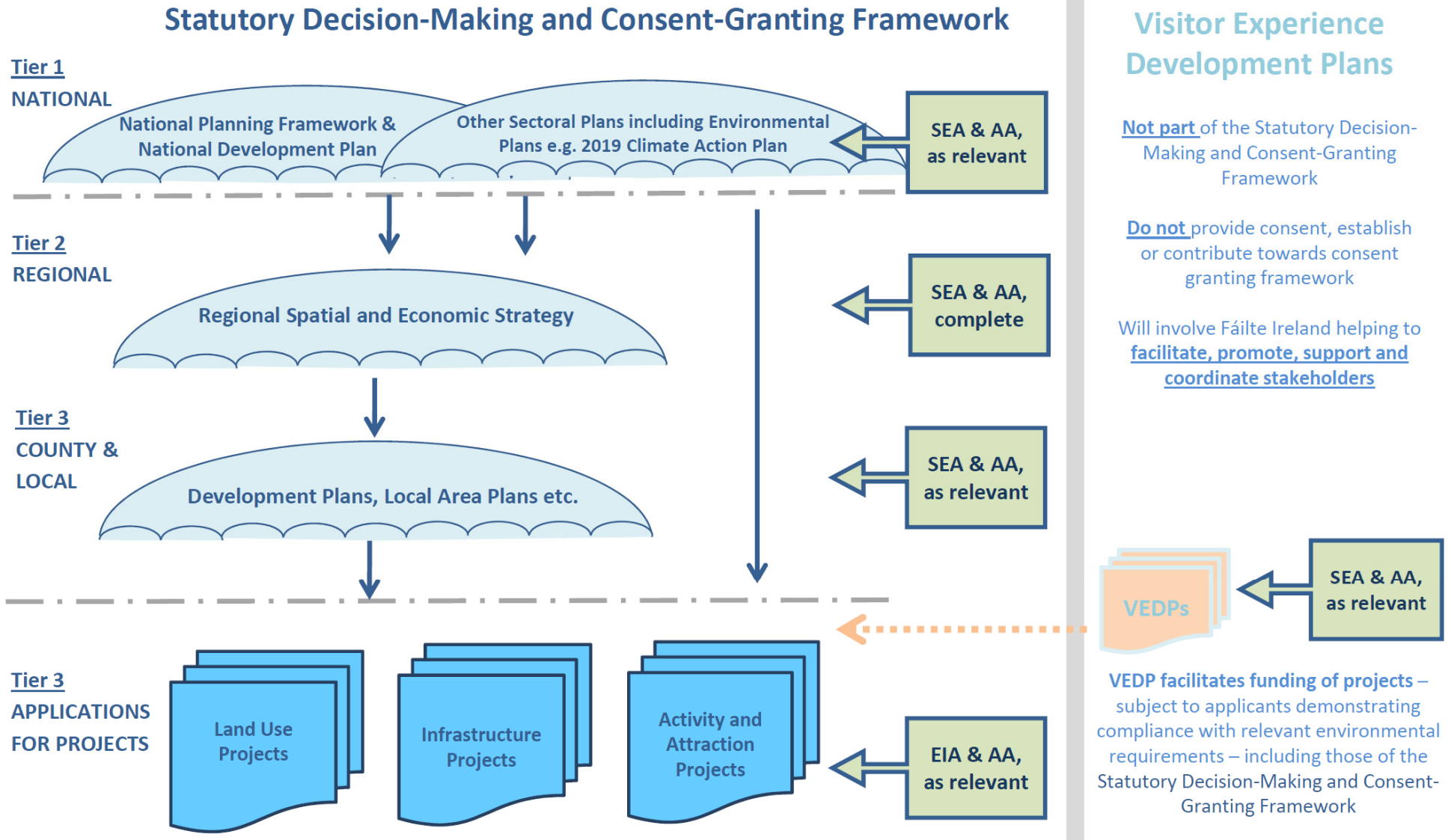


Figure 2.1 Statutory Decision-Making and Consent-Granting Framework, VEDPs and Environmental Assessment Requirements

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 Agriculture, Food and Marine; Department of Communication, Climate Action and Environment; and Department of Culture, Heritage and the Gaeltacht.

These submissions were taken into account during preparation of the SEA and informed the various SEA recommendations that have been integrated into the Plan.

Responses to these submissions and how they have been taken into account during preparation of the SEA is provided at Appendix I "SEA Scoping Submissions and Responses" to this SEA Statement.

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.

This Environmental Report has been updated in order to take account of recommendations contained in submissions and in order to take account of non-material changes that were made to the original, Draft Plan that was placed on public display.

The SEA Environmental Report was updated by:

- Providing reference to and a description of the Non-Technical Summary in Section 1 of the SEA Environmental Report;
- Including reference to subsection 7.3 Cumulative Effects in Section 10 of the SEA Environmental Report.

Updates made to the Plan on foot of submissions include the following:

- Adding "high nature value farming" to Action 6.2 page 30 of the VEDP;
- Adding "in a responsible and sustainable manner alongside commercial fishing" to Action 6.4;
- Providing a greater commitment to environmental protection under Enabler 8.1; and
- Adding "Fáilte Ireland will follow national planning framework guidelines and liaise with relevant planning authorities to ensure any proposed developments are adequately provided for in terms of critical service infrastructure" to the Plan's Guiding Principles.

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 Plan, taking into account the objectives and the geographical scope of the Plan.

4.1 Description of Alternatives

Alternative 1: Business as Usual

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

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

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

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

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

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

- Position the peninsulas as a 'must do' destination and motivate visitors to stay overnight and spend more;
- Extend the length of the season;
- Improve the overall economy of communities through strengthening individual businesses, creating new entrepreneurial opportunities sustaining and increasing job creation and increasing the attractiveness of the area for other forms of economic growth;
- Align to the Wild Atlantic Way brand and target markets;
- Support community values and aspirations, and strengthen community appreciation of local culture and intangible heritage;
- Support sense of place enhancement; and

- Promote collaboration and partnership, support engagement of businesses, and build lasting links between national and regional partners, local agencies and associations, and local tourism experiences.

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 Summary of Evaluation 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 to be mitigated through that process.

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

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

There would be one layer of mitigation under Alternative, 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 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 Three Peninsulas. 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 provisions that have been integrated into the Plan, including those relating to sustainable mobility and compliance with the Climate Action Plan 2019, the National Climate Change Adaptation Framework (2018 and any subsequent versions) and the National Mitigation Plan (2017 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

Certain 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 – Alternative 2A would provide this also. Seasonality and regionality provide a greater spread of tourists throughout the year and across the Three Peninsulas 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 Three Peninsulas. 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 Strategic Environmental Objectives (SEOs)⁷.

Table 4.1 Comparative Evaluation of Alternatives against SEOs

	Likely to Improve status of SEO			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	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 Three Peninsulas, Fáilte Ireland have proceeded with Alternative 2A “A Plan with Additional Requirements for Environmental Protection and Management”.

⁷ Strategic Environmental Objectives (SEOs) are methodological measures developed from policies that generally govern environmental protection objectives established at international, Community or Member State level e.g. the environmental protection objectives of various European Directives that have been transposed into Irish law and that are required to be implemented.

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 VEDP area in order to monitor any effects of visitors;
- Sources maintained by Kerry and Cork County Councils (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 VEDP 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 ⁸	<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) Department of Culture, Heritage and the Gaeltacht report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every 6 years) Department of Culture, Heritage and the Gaeltacht's 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 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 B3ii: Number of significant impacts on the protection of listed species	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: 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 (SI 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) EPA <i>The Quality of Bathing Water in Ireland</i> reports 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
	W1ii: Mandatory and Guide values as set by the EU Bathing Water Directive and transposing Bathing Water Quality Regulations (SI No. 79 of 2008)	W1ii: No deterioration in the value of bathing waters or adverse effect upon the ability of any bathing water to achieve Mandatory values and, where possible, Guide values as a result of the Plan	
	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	

⁸ 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) Input from any other existing or replacement Fáilte Ireland monitoring programmes
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, Irish Water and/or Cork/Kerry County Councils Input from any other existing or replacement Fáilte Ireland monitoring programmes
	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) Input from any other existing or replacement Fáilte Ireland monitoring programmes
	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 land use plans of Cork and Kerry County Councils	L1: No unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in the land use plans of Cork and Kerry County Councils	<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) Input from any other existing or replacement Fáilte Ireland monitoring programmes

Appendix I SEA Scoping Submissions and Responses

SEA Scoping submissions received from the following environmental authorities are responded to below: Environmental Protection Agency; Department of Agriculture, Food and Marine; Department of Communication, Climate Action and Environment; and Department of Culture, Heritage and the Gaeltacht.

No.	Submission Text	SEA Response
Submission from the Environmental Protection Agency		
1	The EPA is one of five statutory environmental authorities 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 Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the Plan.	Noted.
2	Our submission includes comments and recommendations to consider in undertaking the SEA and preparing the Plan. Our comments focus in particular on the EPA's remit and areas of expertise including water, air, climate change waste and noise aspects. In the context of the limited information provided to date on the scope and detail of the Plan, we may provide further comments at the next stage of the SEA process.	Noted.
3	We also attach our ' <i>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</i> ' which sets out our key recommendations for integrating 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 recommend that you take this guidance document into account, where relevant and appropriate, in preparing the Plan and undertaking the SEA.	Noted. This document 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 Plan.
4	Specific Comments on the Plan <i>Infrastructure Related Considerations</i> 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 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 waste water treatment facilities. Should there be a need to construct additional ancillary developments, this should also be captured in the SEA. This would provide a better indication of the nature and possible scale of impacts that could be expected.	Noted. The SEA will consider implications of the potential additional pressures on existing critical infrastructure. The SEA will also consider effects arising from the construction of any ancillary developments.
5	<i>Transport</i> The SEA should assess, and in turn seek to avoid, reduce and mitigate where necessary, the potential environmental effects of a likely increase in tourism-related traffic volumes along any routes resulting from implementation of the Plan. 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 Plan should promote proper and sustainable tourism related developments and ensure that the requirements of relevant environmental legislation are reflected, as relevant and appropriate, in any plans/projects that may arise in implementing the Plan. The 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 Plan, including aspects such as the provision of signage, discovery point information (e.g. installation of interpretative panels) etc.	The SEA process will assess and in turn seek to avoid, reduce and mitigate where necessary, the potential environmental effects of any increase in tourism-related traffic volumes along any routes resulting from implementation of the Plan.
6	<i>Climate Change Resilience</i> You should ensure that the Plan is aligned with national commitments on climate change mitigation and adaptation, as well as relevant sectoral, regional and local adaptation and mitigation plans. Specific climate-related actions or objectives should be included in a specific chapter/section in the Plan. The SEA should consider how resilient the various elements of the Plan (and associated infrastructure) are to the effects of climate change, including impacts arising from prolonged dry / wet spells, increased storm conditions, flooding, soil erosion etc. The EPA has published <i>Local Authority Adaptation Guideline Research Report 164</i> (EPA, 2016), and guidance on the <i>Integration of Climate Change into SEA</i> is also available at http://www.epa.ie/pubs/advice/ea/ . DCCAE climate adaptation guidance is also available at: https://dcae.gov.ie/en-ie/climate-action/publications/Pages/Sectoral-Planning-Guidelines-for-Climate-Change-Adaptation.aspx The Plan should include clear actions/measures which will contribute to the sector reducing its overall carbon footprint. Consideration could be given to the development of relevant initiatives to achieve this within the Plan.	Noted. The SEA will seek to ensure that the Plan contributes towards climate mitigation and adaptation.
7	<i>Biodiversity</i> The Plan should include a specific action / objectives and commitments to protect designated habitats and protected species (and associated ecological corridors/linkages) within and adjacent to the Plan area. In 2012, the EPA published guidance on Integrated Biodiversity Impact Assessment - Streamlining AA, SEA and EIA Processes. Best Practice Guidance. The aim is to inform practitioners, plan / project proponents and consent authorities on integrating SEA, EIA and AA processes and requirements to streamline biodiversity considerations. This may be useful to consider in preparing the Plan and SEA.	Provisions contributing towards the protection of European Sites, habitats and species will be integrated into the Plan. The cited guidance has been considered in the preparation of the SEA Scoping Report and will be considered throughout the SEA process.
8	<i>Ecosystem Services & Green Infrastructure</i> There is merit in considering adopting an ecosystem services approach to the relevant aspects of the SEA. The Plan 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 Plan should include a section that recognises the ecosystem services in the Plan area. The Plan 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. In implementing the Plan, tourism-related development and associated activities should be	The SEA will seek to ensure that the Plan contributes towards provisions related to the protection of habitats and species. The Plan is expected to contribute towards provisions relating to green infrastructure. The value of ecosystems services will be recognised in the Plan and SEA.

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No.	Submission Text	SEA Response
	<p>managed in a manner that avoids or minimises the potential for significant disturbance to habitats and species. Habitat mapping and related ecosystem services mapping, where available, should be incorporated into the Plan. 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 current <i>State of the Environment Report</i> (2016) 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.</p>	
9	<p><i>Water Quality</i> Protection of surface and ground water resources is of vital importance both for human health and ecosystems. In this context, the Plan should provide 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 Plan area. Where specific recommendations/concerns for water bodies within the Plan area are identified in EPA water quality reports, including the 'Water Quality in Ireland 2010 –2015' (EPA, 2017), or displayed on www.catchments.ie, these should also be considered at an appropriate level in the Plan. The Plan should also ensure that any specific relevant objectives and measures for individual water bodies within the Plan area, as set out in the River Basin Management Plan 2018-2021 (and the subsequent third cycle RBMP), are considered, when considering tourism (and ancillary) related developments, to ensure water quality is protected/improved/maintained. An assessment should be undertaken to determine whether any proposals and associated development could be potentially in conflict with the overall Water Framework Directive River Basin Management Plan Principal Actions including the Areas for Action. Any proposals which are identified to be in potential conflict with the River Basin Management Plan and 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. Our WFD App provides a single point of access to water quality and catchment data from the national WFD monitoring programme. The Application is accessed through EDEN https://wfd.edenireland.ie/ and is available to public agencies. Publicly available data can be accessed via the www.catchments.ie website also.</p>	<p>The Environmental Report will use available information on water services and will identify areas that are in need of improvement. The River Basin Management Plan will also be considered.</p>
10	<p><i>Invasive Alien Species Control and Management</i> Control and management of invasive alien species should be taken into account in the planning, construction, and carrying out of maintenance activities (e.g. hedgerow cutting, road or development works) associated with implementing the Plan. A commitment should be included to ensure that implementation of the Plan minimises the risk of the spread of invasive species.</p>	<p>Control and management of invasive alien species will also be considered in preparing the SEA.</p>
11	<p><i>Landscape</i> In preparing the Plan and SEA, landscape sensitivity should be considered. The Plan should consider available Local Authority landscape character assessments, and available habitat mapping of the Plan area.</p>	<p>Landscape sensitivity, landscape character assessments, and available habitat mapping for the area to which the Plan relates will be considered in preparing the SEA.</p>
12	<p><i>Assessment of likely significant effects</i> The assessment should identify and focus on the key relevant environmental aspects of the Plan. The full range of environmental effects (secondary, cumulative, synergistic, short, medium and long term, permanent, temporary, positive and negative) should also be considered in the SEA. The potential for cumulative effects associated with the implementation of the Plan should be considered, in association with other relevant Plans / Programmes and projects within and adjacent to the Plan area. The methodology applied in the assessment of the preferred alternative, along with any assumptions made, should be described. Where possible and practical, quantitative assessments should be undertaken of the assessment of the preferred alternative/ combination of alternatives.</p>	<p>The full range of environmental effects potential for cumulative effects on the environment to arise as a result of implementing the Plan will be assessed and other relevant plans and programmes will be taken into account.</p>
13	<p><i>Additional Plans and Programmes</i> Additional plans to consider include, where relevant: - National Planning Framework - National Greenways Strategy - National Rural Development Programme - Regional Spatial and Economic Strategies - Regional and Metropolitan Area Transport Strategies - Sectoral and Local Authority Climate Adaptation Plans - Catchment Flood Risk Management Plans and associated flood risk mapping - Local Authority Development Plans - Local Authority Heritage/ Biodiversity Plans - Local Authority Tourism Strategies</p>	<p>These plans and programmes will be considered as part of the preparation of the Strategy and associated environmental assessments.</p>
14	<p><i>Alternatives</i> The development of alternatives should be clearly described, as well as the methodology applied in the assessment of alternatives along with any assumptions made. The Agency has published an EPA Guidance document <i>Developing and Assessing Alternatives in Strategic Environmental Assessment - Good Practice Guidance (EPA, 2015)</i>, which should be considered. Key impacts arising from the Plan may be related to increased tourist numbers and associated traffic movements and the associated demands/pressures on critical water and transport related infrastructure. This should be reflected in the assessment of and consideration of alternatives. In considering and assessing alternatives, the alternatives proposed should be reasonable and realistic and should be set at the appropriate strategic level at which the Plan will be implemented operating within the national 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.</p>	<p>Alternatives will be clearly described and the available guidance will be considered.</p>
15	<p><i>Monitoring</i> The Plan should include a commitment to monitoring visitor numbers and to incorporate this into the Plan-implementation and SEA-related monitoring and associated activities, with a view to assessing the potential environmental effects which may occur with increased tourism numbers. It may also assist in determining the capacity of sensitive areas to accommodate visitor numbers at a given time, and during sensitive seasons. The Plan should be subject to the relevant aspects, both established and evolving, for the Wild Atlantic Way Environmental Monitoring Programme.</p>	<p>The SEA ER will include measures for monitoring the likely significant environmental effects of implementing the Plan. The SEA Environmental Report will refer to any relevant monitoring on the impacts of relevant tourism initiatives.</p>

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No.	Submission Text	SEA Response
	The Environmental Report should refer to any relevant monitoring carried out on the impacts of initiatives such as the Wild Atlantic Way and Northern Ireland Causeway Coastal Route or other similar tourism routes. This would provide an opportunity to learn from and incorporate useful approaches to consider in monitoring the effectiveness and environmental performance of the Plan.	
16	<p><i>Appropriate Assessment Considerations</i></p> <p>The Appropriate Assessment (AA) should consider hydrological connections between Natura 2000 sites and potential impacts of the Plan. Features of interest and conservation objectives should be taken into account when assessing the potential impacts of the Plan. The findings of the AA should be reflected in the relevant sections of the SEA. The AA should identify the sensitivities of SPAs/SACs whose integrity could be affected either by the Plan on its own or cumulatively/in combination with other plans and programmes.</p> <p>You should consult with the National Parks and Wildlife Service regarding any existing or proposed new conservation management plans or conservation management plans that may be prepared over the lifetime of the Plan. Where relevant, these should be integrated into the Plan and its implementation. Available conservation management plans can be consulted at: www.npws.ie/protectedsites/conservationmanagementplanning/conservationplans/</p>	The AA will identify any SPAs/SACs whose integrity could be affected either by the Plan itself or cumulatively/in combination with other plans and programmes.
17	<p><i>State of the Environment Report – Ireland’s Environment 2016</i></p> <p>In preparing the Plan and SEA, the recommendations, key issues and challenges described within our most recent State of the Environment Report Ireland’s Environment – An Assessment 2016 (EPA, 2016) should be considered, as relevant and appropriate to the Plan. Addressing and implementing the 7 key actions identified in the report, which are also linked to a number of the UN’s Sustainable Development Goals, will be important in delivering environmental protection and promoting sustainable development in Ireland in the years ahead. Integrating these into the Plan will ensure that future tourism-related development is planned and managed within the context of the wider environmental protection and sustainable development agenda.</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 Plan.
18	<p><i>Sustainable Development Goals</i></p> <p>The Plan should be consistent with, and contribute to achieving, relevant UN Sustainable Development Goals (SDGs). Relevant targets and actions in Ireland’s SDG Implementation Plan (DCCAIE, 2018) should be integrated as appropriate into the Plan, with a view to ensuring that future tourism-related development is planned and managed within the context of the wider sustainable development agenda.</p>	The UN Sustainable Development Goals (SDGs) and relevant targets and actions in Ireland’s SDG Implementation Plan (DCCAIE, 2018) 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 Plan.
19	<p><i>Community Engagement</i></p> <p>One of the key messages from our most recent State of the Environment Report (EPA, 2016) is the importance and value of Community Engagement. In preparing the Plan and carrying out the SEA (including developing alternatives), the need to proactively engage local communities should be a core consideration.</p>	The extensive consultations and workshops with local communities have been carried out by the Fáilte Ireland during the Plan preparation process. The public (including the local community) will be provided with an opportunity to make a submission on the Draft Plan and associated environmental documents during public display.
20	<p>Available Guidance & Resources</p> <p>Our website contains SEA resources and guidance, including:</p> <ul style="list-style-type: none"> - SEA process guidance and checklists - list of relevant spatial datasets - topic specific SEA guidance, such as how to integrate climate change into SEA or consideration of alternatives in SEA. <p>You can access these resources at: http://www.epa.ie/pubs/advice/ea/</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.
21	<p><i>EPA SEA Search and Reporting Tool</i></p> <p>This tool allows public authorities to explore, interrogate and produce high level environmental summary reports. It is intended to assist in screening and scoping exercises. The tool is available through EDEN www.edenireland.ie</p>	EPA maps have been considered in the preparation of this report and will be considered throughout the SEA process.
22	<p><i>EPA WFD Application</i></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 accessed through EDEN https://wfd.edenireland.ie/ and is available to public agencies. Publicly available data can be accessed via the Catchments.ie website.</p>	EPA WFD data has been considered in the preparation of this report and will be considered throughout the SEA process.
23	<p><i>NBDC-National Biodiversity Data Centre</i></p> <p>www.biodiversityireland.ie</p>	This source of information will be considered by the AA and SEA where appropriate.
24	<p><i>Environmental Authorities</i></p> <p>Under the SEA Regulations, you should also consult with:</p> <ul style="list-style-type: none"> • The Minister for Housing, Planning and Local Government • Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment • where it appears that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, the Minister for Culture, Heritage and the Gaeltacht. 	Notice has also been given to relevant environmental authorities as part of the SEA scoping process.
Submission from the Department of Communications, Climate Action and Environment		
1	Geological Survey Ireland provides information on all aspects of the geology of Ireland on our Map Viewer available on the GSI website www.gsi.ie . There are multiple layers of data available including Geology, Groundwater, Quaternary, Landslides, and Geological Heritage. Our newest map is the Physiographic Units map and this is especially designed to give information on land use. We would encourage the use of our Map Viewer when creating the SEA.	Noted.

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No.	Submission Text	SEA Response
2	<p>Geoheritage</p> <p>Geological Survey Ireland (GSI) is in partnership with the National Parks and Wildlife Service (NPWS, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) 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 Irish Geoheritage Programme (IGH) of GSI, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.</p>	Noted.
3	<p>County Geological Sites (CGS), as adopted under the National Heritage Plan, include additional sites that may also be of national importance but which were not selected as the very best examples for NHA designation. All geological heritage sites identified by GSI are categorised as CGS pending any further NHA designation by NPWS. CGS are now routinely included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system.</p> <p>County Geological Sites in audited and unaudited counties can now be viewed online under the Geological Heritage tab on the Geological Survey Public Data Online Viewer at: Geological Survey's Online Viewer or via a direct link at: Geoheritage Online Viewer.</p>	Relevant County Geological Sites have been considered in the preparation of this report and will be considered throughout the SEA process.
4	<p>There are multiple CGSs located within the proposed area. The County Audit for Cork has not been completed yet and all data provided should be considered preliminary.</p> <ul style="list-style-type: none"> • Mizen Head - Barley Cove, Co Cork. (Central ITM: 76000, 25000). Registered under IGH 13 Coastal Geomorphology theme. High cliffs, folded Old Red Sandstone, curving sandy beach and dunes, a tidal lagoon, low hummocky sandy terrain. High cliffs of very hard grey strongly-folded Old Red Sandstone. Barley Cove, to the east, is a long bay backed by a sandy beach and dunes. The dunes are of calcareous sand, which forms backing low hummocky sandy terrain. • Dhurode Mine, Co Cork. (Central ITM: 78100, 30800). Registered under IGH 6 Mineralogy theme. Copper minerals/antimony; arsenopyrite large crystals; connelite. Cu & Sb mins; Asp - to 3cm (Cornelite); antimony; connelite; arsenopyrite large crystals; paper by Ven. • Crookhaven and Brow Head, Co Cork. (Central ITM: 81200, 25530). Registered under IGH 15 Economic geology. Green bed copper in red beds. Strata bound & vein mineralisation well exposed in accessible old workings. Crookhaven copper mines driven on the Champion and Gozin lodes. Lodes trend NE in green slates and grits. Champion lode 15 metres of quartz, unmineralized. • Dunmanus Castle Northwards, Co Cork. (Central ITM: 84600, 33200). Registered under IGH 10 Devonian theme. <p>These sites should be considered when working on the development plans, as they may enhance the plan due to their geotourism potential. Geological Survey Ireland supports community-driven geotourism and we are available to advise further on this if required. As these are sites of geological significance that could attract attention from visitors, they have the potential for public information on the interpretation of the landscape or the geological history of the area. GSI will be happy to consult on any possible interpretation plans and will provide data and maps were necessary. Please contact Siobhán Power at Siobhan.Power@gsi.ie for further information.</p>	Relevant County Geological Sites have been considered in the preparation of this report and will be considered throughout the SEA process.
5	<p>Geological Survey Ireland is the national earth science agency and has datasets on Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources and the Irish Seabed. These comprise maps, reports and extensive databases that include mineral occurrences, bedrock/mineral exploration groundwater/site investigation boreholes, karst features, wells and springs. Please see our website for data availability.</p>	Noted.
No.	Submission Text	SEA Response
Submission from the Department of Agriculture, Food and the Marine		
1	<p>Where SEA scoping indicates potential impacts on sea-fisheries and the marine environment, the following information should be taken into account in the SEA.</p> <p>Relevant Legislation, Plans and Policies</p> <ul style="list-style-type: none"> • Foreshore Acts 1933 to 2011 • Aquaculture Acts 1997 to 2006 (Fisheries (Amendment) Act 1997 and amendments) • Sea Fisheries and Maritime Jurisdiction Act 2006 & Sea-Fisheries Regulations • Fisheries Natura Plans & Declarations made under European Union (Birds and Natural Habitats) (Sea-fisheries) Regulations 2013 (online at http://www.fishingnet.ie/sea-fisheriesinnaturaareas/natura2000sitesundermanagement/) • National Seafood Operational Programme (EMFF requirement) & National Strategic Plan for Aquaculture (CFP requirement) currently under preparation for 2014 – 2020 • Food Wise 2025 • Harnessing Our Ocean Wealth – the national integrated marine plan for Ireland • Implementation of pollution reduction programmes for designated shellfish waters (Shellfish Waters Directive 2006/113/EC) • Classified Shellfish Production areas (classified for food safety and consumer protection purposes under Regulation (EC) No 854/2004) • National Climate Change Adaptation Framework – particularly sector adaptation plans (including marine) 	These plans and programmes will be taken into account by the SEA process, as relevant.
2	<p>Issues for consideration</p> <p>In the development of any Plans or Programmes due consideration should be given to:</p> <ul style="list-style-type: none"> • Potential impacts, both positive and negative, on marine environmental quality including potential impacts on designated Shellfish Growing Waters. Examples include, but are not limited to the following: increased sedimentation; re-suspension of contaminants; discharge of contaminants; and introduction of non-native or invasive species. • Potential impacts, both positive and negative, on the microbiological quality of shellfish in Classified Shellfish Production areas • Potential impacts on human health resulting from the placing on the market of microbiologically contaminated shellfish • Potential impacts on commercially important fish and shellfish stocks, licensed aquaculture sites and areas of importance for fish / shellfish and fisheries e.g. spawning grounds, nursery areas • Potential impacts on freshwater aquaculture operations including the requirement for water abstraction and capacity of the receiving waters to assimilate discharges 	The SEA will consider potential issues relating to the marine environment as relevant.

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No.	Submission Text	SEA Response
	<ul style="list-style-type: none"> • Future designations of areas of importance to the Aquaculture & Fisheries Sector • Relevant EU Directives and National Legislation in the area of Marine Spatial Planning 	
3	<p>Potential Impacts on Sea-Fisheries & Aquaculture Major land-use changes can significantly impact the quality of the marine (particularly coastal) environment (e.g. sedimentation, hydrographic change, impacts on benthic eco-system, etc). All aspects of the seafood sector rely on safe high quality water and assessment of potential impacts on water quality should include the seafood sector. To guarantee food safety the growing waters must attain certain standards. This is of relevance to the fishing and aquaculture sectors. In freshwater aquaculture (on land) a continuity of supply is important to ensure animal welfare and quality. Water supplies in this instance are sourced from rivers, wells and occasionally from mains supplies. The seafood processing sector also requires a safe and reliable water supply to support its operations. Designated shellfish waters are very important to the shellfish sector in Ireland working to maintain standards in product safety and quality and enabling sale for direct consumption from many areas, reducing production costs and contributing to the good international reputation of the products. The role of filter-feeding shellfish as a nutrient sink thus helping to reduce eutrophication potential and improve water quality is also important to consider in assessments.</p>	<p>The SEA will consider potential issues relating to Sea Fisheries and Aquaculture including those related to water quality and supply.</p>
4	<p>Sources of Marine Data Details of designated shellfish growing areas which are protected by law (2006/113/EC) are available at: http://www.environ.ie/en/Environment/Water/WaterQuality/ShellfishWaterDirective/ Details of Classified Shellfish Production areas (classified for food safety and consumer protection purposes under Regulation (EC) No 854/2004) are available on the Sea-Fisheries Protection Authority website: http://www.sfpa.ie/ The Marine Institute publishes a range of corporate reports, scientific and technical reports, peer reviewed articles and conference papers which are relevant to the SEA process. These can be found on the Marine Institute website: http://www.marine.ie/home/Publications/ or Marine Institute Open Access Repository. Relevant reports and on line GIS include: Shellfish Stocks and Fisheries Review 2011: An Assessment of Selected Stocks Atlas of Commercial Fisheries Around Ireland Atlas of Commercial Discarding Ireland's Marine Atlas Information on the Initial Assessment of Ireland's marine waters, required under the Marine Strategy Framework Directive, is available at http://www.environ.ie/en/Environment/Water/WaterQuality/Marine/</p>	<p>These information sources will be utilised by the SEA process as relevant.</p>
5	<p>Who to Consult With DAFM – Policies, plans and legislation concerning sea-fisheries & aquaculture SFPA – Competent Authority for Seafood Safety (classifications, monitoring & sanitary surveys) & Sea-fisheries Control Marine Institute – Fisheries & Marine Environment BIM – Seafood Development Agency Consideration should also be given to consulting directly with the seafood sector. This may include regional inshore fisheries forums, Fisheries Local Action Groups, fisheries representative bodies, including producer organisations, local advisory committees, associations, co-operatives; seafood processors; aquaculture representative bodies, etc.</p>	<p>Designated environmental authorities have been consulted with as part of the SEA Scoping process. Submissions on the Draft Plan and associated environmental assessments documents will be allowed during public consultation period.</p>
Submission (Built Heritage) from the Department of Culture, Heritage and the Gaeltacht		
1	<p>This Department welcomes being consulted in regard to the proposed SEA for the Three Heads Visitor experience. The plan will encompass a diverse coastal area that includes greenfield sites, watercourses and marine environments that are rich in cultural heritage. Dunlough or Three Castles Head is a unique landscape, with its frontier castle and other recorded archaeological sites that date from prehistoric times to the late- and post-medieval periods; all of which are afforded statutory protection under the National Monuments Acts 1930-2014. But this is a maritime landscape, with the sea integral to the sighting of the castle and other sites within the area and therefore any visitor experience should include the connectivity between land and sea. Ships sailed the immediate waters and were lost in view of the sites there, access was possible to and from the land and the inter-visibility and connectivity between the two should not be ignored. The Department requests that the SEA and any other associated assessments shall take account of this maritime context and shall include the following observations and recommendations of the Department of Culture, Heritage and the Gaeltacht.</p>	<p>The information provided will be integrated into the SEA ER as appropriate.</p> <p>The SEA will consider potential impacts in relation to known and unknown archaeology, including the underwater archaeological heritage of the Three Heads.</p>
2	<p>The SEA should contain a detailed Cultural Heritage Section that looks to assess all aspects of the Three Heads/Mizen Head area and its Environs (both for terrestrial and underwater cultural heritage). This in turn will provide a comprehensive archaeological assessment as part of a strategic assessment process to inform the Visitor Experience Development Plan and cover potential developments or works that may not be subject to the normal planning process. There is a potential for previously unrecorded archaeology, including that from an underwater environment, with the lake a key element within the context of the castle of Dunlough. Associated archaeology in the form of residual bawn walls, small craft that utilised the lake, artefactual evidence, access to the sea (e.g. via rock but steps, slipways, etc.) may all form part of the maritime cultural landscape and should be considered in any Visitor Experience Plan. Ships and wrecks that lie off the coastal cliffs at Three Castles Head should also be included as they are the link between the environments in which any visitor finds themselves with the wider Atlantic world.</p> <p>The Department therefore recommends that the SEA include assessment of the known and potential cultural heritage in all areas to be covered by the proposed visitor plan. This shall include the known and potential terrestrial and underwater archaeological heritage in areas that may be the subject of proposed developments in the future, including lacustrine locations, etc.</p> <p>An Archaeological Impact Assessment (AIA)/Underwater Archaeological Impact Assessment (UAIA) can be desk based in the first instance, with the more detailed fieldwork or underwater assessments carried out as part of the statutory planning process. The Department recommends that the AIA/UAIA be undertaken by a suitably qualified and suitably experienced archaeologist (with underwater/maritime experience regarding the Underwater Cultural Heritage), that shall ensure an informed assessment is carried out that will fully inform the Visitor Experience but will</p>	<p>Effects on cultural heritage (terrestrial and underwater, known and unknown) will be assessed as required by the SEA Directive. Various dedicated parts of the SEA Environmental Report will relate to cultural heritage. As is normal practice, more detailed archaeological assessment will be undertaken at project level.</p>

SEA Statement for the Three Peninsulas Visitor Experience Development Plan

No.	Submission Text	SEA Response
	<p>also ensure that future proposed works that fall under both statutory and non-statutory regulations with regard to the planning process, will be addressed.</p> <p>Terrestrial & Underwater Archaeology: In The Record of Monuments and Places (RMP) recorded archaeological sites are to be found within the areas addressed. These Recorded Monuments are protected under the National Monuments (Amendment) Acts. The RMP is not an exhaustive list of all archaeology in existence, and in this regard the Department would like to draw the applicant's attention to the Department's published policy in relation to the archaeological assessment of large-scale developments on sites where there are no previously recorded monuments (Framework and Principles for the Protection of the Archaeological Heritage – Published by Dúchas The Heritage Service).</p> <p>Similarly, contained within the areas covered are underwater environments, including riverine/lacustrine environments. These may contain known and previously unknown underwater archaeological heritage that should be considered in any appropriate assessment.</p> <p>It is the Department's policy that proposed developments, due to their location, size, or nature, which may have implications for the archaeological heritage, should be subject to archaeological assessment. This should be included in the Visitor Experience Development Plan. Such developments include those that are located at or close to an archaeological monument or site, those that are extensive in terms of area (1/2 hectare or more) or length (1 kilometre or more), those that may impact the underwater environment (marine, intertidal/foreshore, riverine or lacustrine) and developments that require an Environmental Impact Statement. Archaeological heritage includes:</p> <ul style="list-style-type: none"> • National Monuments in the ownership or care of the State or Local Authority; it shall be noted that these will have Consent requirements and will need to be addressed directly with the National Monuments Service in this regard. • Archaeological and Architectural monuments/sites in the Record of Monuments and Places. • Monuments in the Register of Historic Monuments • Zones of Archaeological Potential in Historic Towns • Underwater Archaeological Heritage, including Historic Wrecks • Previously unknown and unrecorded archaeological sites (including subsurface elements with no visible surface remains and potential sites underwater in rivers, lakes or the sea, that can include wharves, jetties, quays, piers, fish traps, anchorages, bridges, fording points, rockcut steps or sea caves) • Potential sites located in the vicinity of large complexes of site or monuments • Present or former wetlands, unenclosed land, rivers or lakes, reclaimed areas, or the inter-tidal zone. 	
3	<p>The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority, in her role as statutory consultee under the Planning and Development Act, 2000, as amended.</p>	<p>These comments and recommendations made by the Department will be considered throughout the SEA process.</p>
<p>Submission (Nature Conservation) from the Department of Culture, Heritage and the Gaeltacht</p>		
	<p>This proposal relates to a potential development which is within the borders of the Three Castle to Mizen Head Special Area of Conservation (SAC) (Site Code 000109) and also the Sheep Head to Toe Head Special Protection Area (SPA) (Site code 004156).</p> <p>Any development with the potential to impact on the qualifying interests of these two designated areas needs to comply with the legislative obligations of the State in relation to Habitats Directive Screening/Appropriate Assessment procedures.</p> <p>The above observations/recommendations are based on the papers submitted to this Department on a pre-planning basis and are made without prejudice to any observations that the Minister may make in the context of any consultation arising on foot of any development application referred to the Minister, by the planning authority, in her role as statutory consultee under the Planning and Development Act, 2000, as amended.</p>	<p>Comments made in the SEA Scoping submission in relation to AA will be taken into account by that process.</p>