

SEA ENVIRONMENTAL REPORT

APPENDIX III – NON-TECHNICAL SUMMARY

FOR THE

INISHOWEN PENINSULA DESTINATION EXPERIENCE DEVELOPMENT PLAN

for: Fáilte Ireland

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Section 1 Introduction and Terms of Reference

This is the Non-Technical Summary of the Environmental Report for SEA Environmental Report for the Inishowen Peninsula Destination Experience Development Plan (hereafter referred to as 'the Plan' or 'DEDP'). The purpose of the Environmental Report is to provide a clear understanding of the likely environmental consequences of decisions regarding the adoption and implementation of the Plan. The Environmental Report has been prepared as part of a Strategic Environmental Assessment (SEA) process that is being undertaken by CAAS Ltd. on behalf of Fáilte Ireland.

What is an SEA?

SEA is a systematic process of predicting and evaluating the likely environmental effects of implementing a proposed 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, social and other considerations.

Why is it needed?

The SEA is being carried out in order to comply with the provisions of the Planning and Development (SEA) Regulations, as amended, and in order to contribute towards sustainable development and environmental protection and management. The output of the process is an Environmental Report that should be read in conjunction with the Plan.

How does it work?

All of the main environmental issues in the area were assembled and considered by the team who prepared the Plan. This helped them to devise a Plan that contributes towards the protection and management of environmental sensitivities. It also helped to identify wherever potential conflicts between the Plan and the environment exist and enabled these conflicts to be mitigated.

The SEA was scoped in consultation with designated environmental authorities.

What is included in the Environmental Report that accompanies the Plan?

The Environmental Report contains the following information:

- A description of the environment and the key environmental issues;
- A description and assessment of alternatives for the Plan;
- An assessment of the provisions of the Plan; and,
- Mitigation measures, which will avoid/reduce the environmental effects of implementing the Plan and will contribute towards compliance with important environmental protection legislation.

Difficulties Encountered during the SEA process

No significant difficulties were encountered in undertaking the assessment.

What happens at the end of the process?

An SEA Statement is prepared which summarises, inter alia, how environmental considerations have been integrated into the Plan.

Section 2 The Plan

2.1 Overview

The Inishowen Peninsula DEDP is a five-year plan designed to be a roadmap for enhancing the existing Inishowen Peninsula¹ visitor proposition to achieve the objectives of addressing seasonality, increasing visitor numbers and spend, and increasing dwell time and visitor dispersion across the destination.

The challenge is to deliver enough memorable moments that will inspire visitors to share their experience and also encourage them to return, while providing the tourism industry with a central focus for experience development. The focus of this Plan is ultimately on encouraging visitors to stay longer and spend more, and to develop a new appreciation for the unique values of Inishowen and its people.

The Plan's **Vision Statement** highlights the significant eco-cultural heritage of Inishowen: *"A destination recognised for our internationally significant marine ecosystem, our distinctive maritime and military heritage, our creative story, and the opportunity it offers to pursue adventure, health, and well-being year-round."*

Elevating this distinctive identity lies at the core of this DEDP and work towards achieving the vision will require a collaborative approach that brings the diverse community of interests together including agency representatives, community groups with ecological and cultural heritage aspirations, and businesses. This approach has the potential to play a pivotal role in the ongoing development and promotion of Inishowen Peninsula as a unique bio-cultural region on the Wild Atlantic Way.

The purpose of the Plan is to present the destination development themes organised into an experience development framework to be adopted as a destination action plan for the next five years. This framework will provide the context for tourism operators and stakeholders to work in partnership, create new and improve existing visitor experiences, and communicate coherent and unified stories to the visitor.

The **Plan Goals** are:

- To enrich communities through sustainably growing and spreading the benefits of tourism across the peninsula year-round.
- To adopt new ways of working collaboratively to differentiate Inishowen and deliver compelling HERO experiences.
- To add value to our sense of place and to ensure that the integrity of our ecosystems, landscapes and traditions are respected.

The **Key Objectives** of the Plan are to develop compelling experiences for this stretch of the Wild Atlantic Way that will:

- Position Inishowen 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;
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; and
- **Protect the natural heritage and special environmental character of the region.**

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.

¹ Focused on the area stretching from the waters of the Atlantic Ocean to the north, Lough Foyle to the east and Lough Swilly to the west.

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 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).

2.2 Relationship with other relevant Plans and Programmes

The Plan sits within 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 documents 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 (RSESs) and lower-tier Development Plans and Local Area Plans. The RSES for the Northern and Western Region (that includes the area to which the Plan 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 RSES provides a framework for 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 Inishowen Peninsula DEDP 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 Inishowen Peninsula DEDP (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 Inishowen Peninsula DEDP is not part and does not contribute towards.

² Demonstration of compliance may be supported by monitoring undertaken by the beneficiary.
CAAS for Fáilte Ireland

Section 3 The Environmental Baseline

3.1 Introduction

The summary of the environmental baseline of the Plan area is described in this section. This baseline together with the Strategic Environmental Objectives, which are identified in Section 3.11, is used in order to identify, describe and evaluate the likely significant environmental effects of implementing the Plan and in order to determine appropriate monitoring measures.

The area to which the Plan relates shares a border with Northern Ireland and the potential for likely significant transboundary environmental effects is considered by the SEA. For this purpose, environmental baseline information at and across the border in Northern Ireland relating to each of the environmental components have been considered, the summary of which is described in this section. For more detail refer to SEA Environmental Report.

3.2 Likely Evolution of the Environment in the Absence of the Plan

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

3.3 Biodiversity and Flora and Fauna

Key ecological sensitivities across the area to which the Plan relates include those relating to:

- Rare species and habitats protected in the designated Special Protection Areas (SPAs) and Special Areas of Conservation (SACs);
- Peatlands associated mainly with upland and coastal locations;
- Aquatic and riverine ecology associated with the various lakes, streams, rivers, and estuaries; and
- Coastal areas and marine waters and associated aquatic ecology downstream of the area to which the Plan relates.

Land cover types for the Inishowen Peninsula DEDP area is shown on Figure 3.2.

European sites occur along the waterways, marine and coastal areas and within and downstream of the area to which the Plan relates. These European sites comprise:

- Special Areas of Conservation³ (SACs); and
- Special Protection Areas⁴ (SPAs).

The SEA uses the same zone of influence cited in the Appropriate Assessment (AA); a 15 km buffer around the area to which the Plan relates. European sites designated within and within 15 km buffer of the area to which the Plan relates are mapped on Figure 3.1. For more detail on European sites refer to the SEA Environmental Report and AA document that accompanies the Plan.

Other ecological designations occur within and adjacent to the Plan area and these are detailed in the main SEA Environmental Report.

Existing Fáilte Ireland Environmental Monitoring

Fáilte Ireland regularly engages with environmental research that is used to make informed management decisions and produce robust guidelines to facilitate the protection of the environment. From its inception

³ SACs have been selected for protection under the European Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) due to their conservation value for habitats and species of importance in the European Union. The Habitats Directive seeks to establish Natura 2000, a network of protected areas throughout the EU. It is the responsibility of each member state to designate SACs to protect habitats and species, which, together with the SPAs designated under the 1979 Birds Directive, form Natura 2000. The European Communities (Birds and Natural Habitats) Regulations 2011 consolidate the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and Natural Habitats)(Control of Recreational Activities) Regulations 2010.

⁴ SPAs have been selected for protection under the 1979 European Council Directive on the Conservation of Wild Birds (79/409/EEC) - referred to as the Birds Directive - due to their conservation value for birds of importance in the EU.

in 2014, the Wild Atlantic Way (WAW) Operational Programme Monitoring Programme (undertaken to date by CAAS on behalf of Fáilte Ireland guided by relevant stakeholders) has been conducting research into the impacts of tourism on the receiving environment. On site observational surveys and ecological assessments have covered 57 locations and monitored the activities and effects of over 26,000 visitors.

From the monitoring work it was seen that 75% of all visitor observations resulted in no identifiable effects; which highlights the feasibility of 'no impact tourism' being an achievable target.

3.4 Population and Human Health

Using the 2016 Census data, the population of the area to which the Plan relates was identified as being located within/partially within the Inishowen Local Electoral Area⁵.

Population has the potential to interact with various environmental components. Potential interactions include:

- Recreational and development pressure on habitats and landscapes;
- Contribution towards increase in demand for wastewater treatment at the municipal level;
- Contribution towards increase in demand for water supply and associated potential impact of water abstraction;
- Potential interactions in flood-sensitive areas; and
- Potential effects on water quality.

Human health has the potential to be impacted upon by environmental vectors (i.e. environmental components such as air, water or soil through which contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings). Hazards or nuisances to human health can arise as a result of exposure to these vectors arising from incompatible adjacent land uses for example. These factors have been considered with regard to the description of: the baseline of each environmental component; and the identification and evaluation of the likely significant environmental effects of implementing the Plan.

The greatest health risk from radiation in Ireland is caused by radon. The presence of radon gas, a naturally occurring radioactive gas that originates from the decay of uranium in rocks and soils, occurs across the country. The number of homes within the area to which the Plan relates with radon levels above the reference level is within the normal range experienced in other locations across the country.

3.5 Soil

Active blanket bogs and active raised bogs are considered to be priority habitats, listed on Annex I of the EU Habitats Directive. Ombrotrophic (rain-fed) and minerotrophic (groundwater fed) peat soils are often indicative of areas that are the most sensitive to development due to ecological sensitivities and impeded drainage issues. Many of these peat areas are also subject to ecological designations. Ombrotrophic peat bogs are a dominant soil type occurring extensively within the area to which the Plan relates. Other soil types identified across the area to which the Plan relates include: brown podzolics; brown earths; alluvial soils; lithosol soils; and surface water and groundwater gleys. Areas of tidal marsh occur along estuaries surrounding the area to which the Plan relates and blown sand and dunes occur in the north of the area to which the Plan relates. These areas are often very sensitive to development due to ecological sensitivities. Outcropping rock is found mainly in the coastal and upland areas.

Geological Survey Ireland coordinates the Irish Geological Heritage Programme, which seeks to identify and select sites of geological interest within each county across the country. The audit report of geological sites in County Donegal was published in 2020. There are a number of County Geological Sites across the area to which the Plan relates with the highest concentration of these sites occurring within coastal and upland locations.

The area to which the Plan relates has a small number of locations with a history of landslide events, associated with the upland, peatland areas. The GSI have identified the area to which the Plan relates as having mainly low levels of landslide susceptibility with some areas of moderately high and high levels of landslide susceptibility mainly in the upland and coastal parts of the area to which the Plan relates.

⁵ Detailed information on the population for the area to which the Plan relates can be accessed from the *CSO – Census 2016 Small Area Population Statistics* mapping: <https://cso.maps.arcgis.com>.

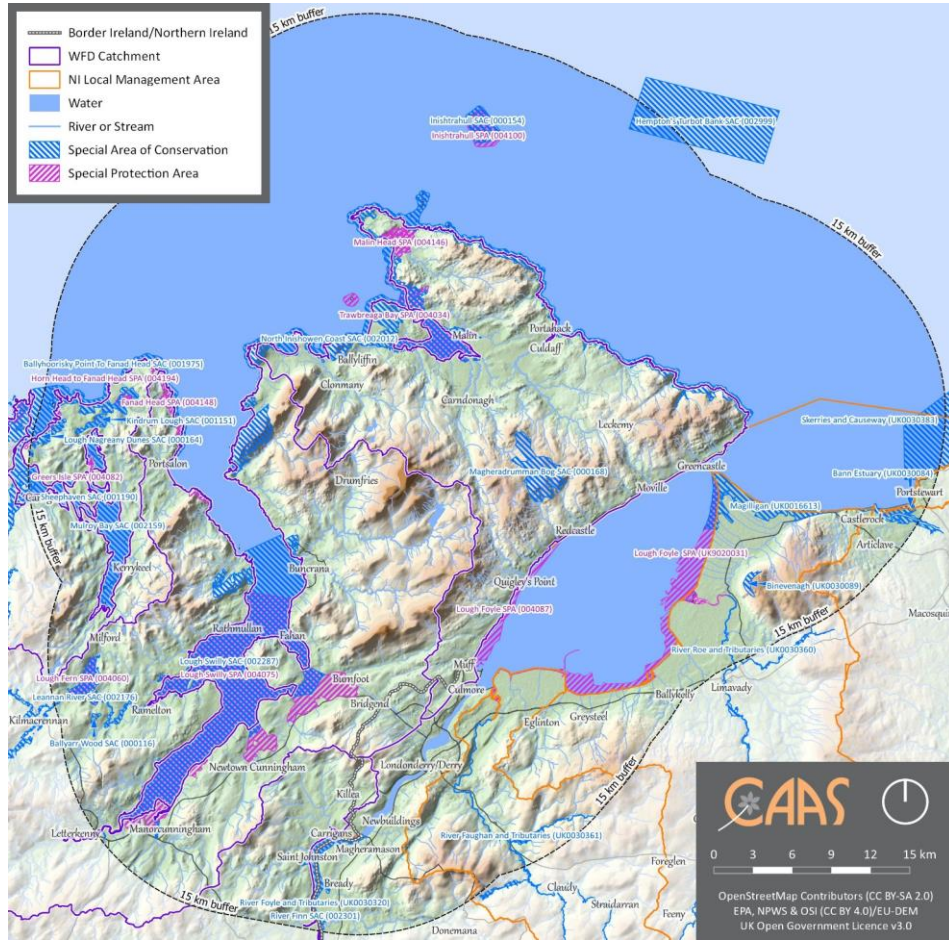


Figure 3.1 European sites within and adjacent to the area to which the Plan relates

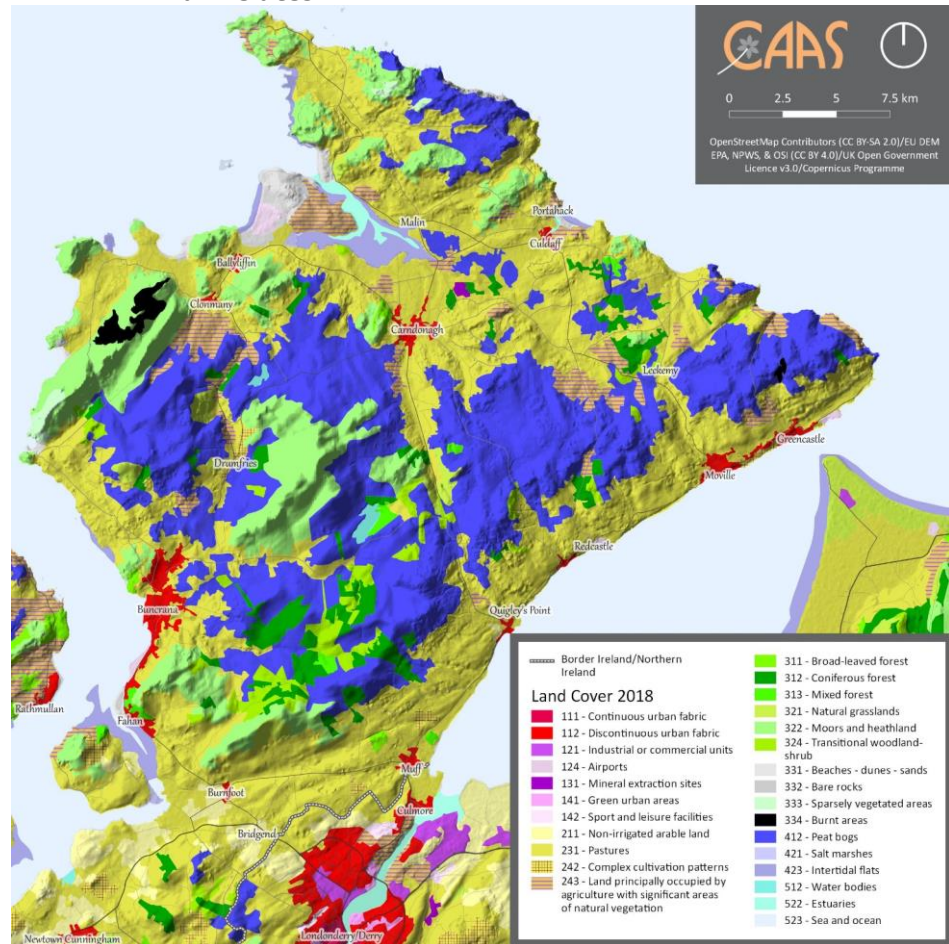


Figure 3.2 CORINE Land Cover Mapping 2018

3.6 Water

Surface and Ground Water Status

Since 2000, Water Management in the EU has been directed by the Water Framework Directive 2000/60/EC (WFD). The WFD requires that all Member States implement the necessary measures to prevent deterioration of the status of all waters - surface, ground, estuarine and coastal - and protect, enhance and restore all waters with the aim of achieving *good status*.

The main waterbodies in the area to which the Plan relates include: Lough Swilly; Lough Foyle; Lough Fad; Trawbrea Bay; Northern Atlantic Seaboard; River Crana; and the River Donagh.

The WFD surface water status (2013-2018) for rivers and lakes within and surrounding the area to which the Plan relates, including a number of unassigned, waterbodies is shown on Figure 3.3.

The WFD status of the rivers and lakes within the area to which the Plan relates is classified as *high, good* and *moderate* however, sections of rivers and streams (including: Aghaweel; Ardagh; Ballycrams; Ballyhallan; Bredagh; Burnfoot; Carrigans; Carrowen; Carrowhugh; Cashelnacor; Clonmany; Cloontagh; Crana; Culdaff; Donagh; Drumbrinet Stream; Glennagannon; Greencastle; Long Glen; Malin Stream; Mill; Owenboy; Owenerk; Portaleen; Roosky; and Skeoge) are identified as being of *poor* due to unsatisfactory ecological/biological and/or physio-chemical status.

The status of transitional and coastal waterbodies within and adjacent to the area to which the Plan relates ranges from *moderate* to *high* and *good*, however Blanket Nook Lough is identified as being of *poor* due to unsatisfactory ecological/biological and/or physio-chemical status.

The most recent available data from the EPA for 2021⁶ shows that locations of designated bathing waters (shown on Figure 3.3) are classified as *poor* at Lady's Bay in Bunrana, *good* at Lisfannon and *excellent* at Culdaff and Stroove.

The WFD status of river and coastal waterbodies in Northern Ireland (2018) adjacent to the area to which the Plan relates is also shown on Figure 3.3.

Aquifer Vulnerability

Aquifer vulnerability refers to the ease with which pollutants of various kinds can enter into groundwater. The aquifers underlying most the Plan area are generally classified as being of *High, Moderate or Low vulnerability*. Extreme vulnerability and extreme (rock at or near surface or karst) is found mainly throughout within and along coastal and upland locations within the area to which the Plan relates.

Flooding

Certain areas across the area to which the Plan relates are at risk from pluvial⁷, fluvial⁸ and coastal⁹ flooding. Historical flooding is documented at a number of locations within the area to which the Plan relates.

Predictive OPW Preliminary Flood Risk Assessment mapping, OPW Catchment Flood Risk Assessment Mapping and OPW National Indicative Fluvial Mapping indicate areas likely to be at most risk of flooding across the country, including the area to which the Plan relates. A number of settlements within the area to which the Plan relates are identified by this mapping as being at elevated risk of flooding.¹⁰

Strategic Flood Risk Assessment (SFRA) as required by the 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (OPW and DEHLG, 2009) is relevant to project planning and development and associated environmental assessment and administrative consent of projects.

⁶ EPA (2022) Report: *Bathing Water Quality in Ireland 2021*

⁷ Resulting from high intensity rainfall events where run-off volume exceeds capacity of surface water network.

⁸ Watercourse capacity is exceeded or the channel is blocked and excess water spills from the channel onto adjacent floodplains.

⁹ Resulting from higher sea levels than normal causing the sea to overflow onto land. Such flooding is influenced by high tide level, storm surges and wave action.

¹⁰ www.floodinfo.ie

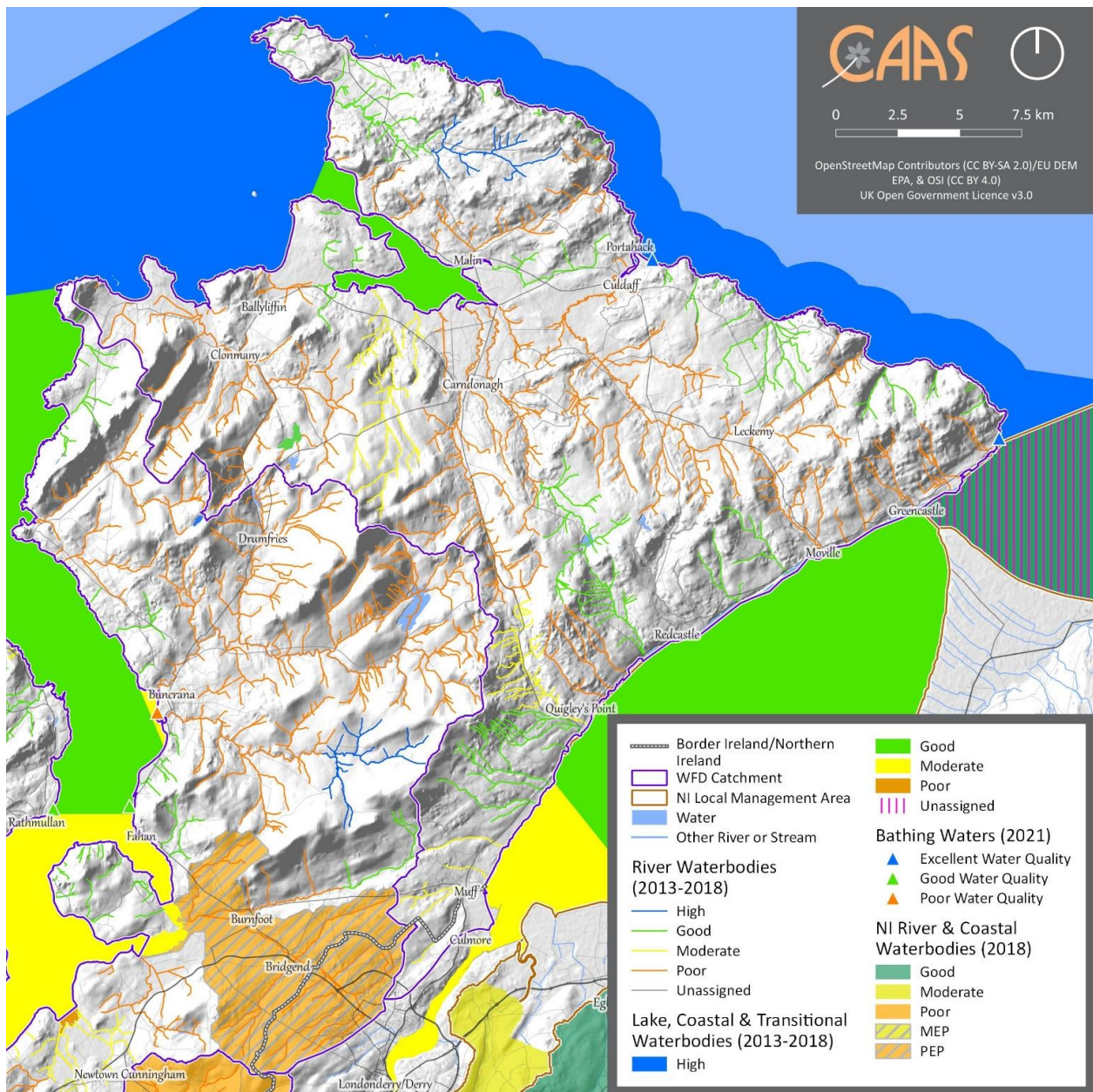


Figure 3.3 Surface Water Status (2013-2018) NI WFD River and Coastal Waterbodies Status (2018) and Bathing Water Status (2021)

3.7 Air and Climatic Factors

Various provisions relating to climatic factors have been integrated into the Plan, compliance with which will need to be demonstrated by those seeking or maintaining funding from Fáilte Ireland. Such measures include those relating to:

- Walking and cycling; and
- Contribution towards European and national objectives for climate adaptation and mitigation, taking into account a wide range of detailed measures including those relating to resilience.

Interactions with climatic factors are also present with other environmental components including water/flooding (see Section 3.6).

Total emissions of greenhouse gases by humans come from various sectors including transport, agriculture, energy industries, manufacturing combustion, industrial processes, residential developments, commercial services developments, waste management processes and fluorinated gases equipment (such as refrigeration and fire protection systems).

The revised National Climate Action Plan 2021 is an all of Government plan to tackle climate change and bring about a step change in Ireland's climate ambition over the coming years. The plan sets out an ambitious course of action over the coming years to address the diverse and wide-ranging impacts climate disruption is having on Ireland's environment, society, economic and natural resources. The Climate Action Plan 2021 provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting us on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.

In order to apply with European Directives relating to air quality, the EPA manages the National Ambient Air Quality Network and measures the levels of a number of atmospheric pollutants at locations across the country. The current¹¹ air quality in the area to which the Plan relates is identified by the EPA as being *good*.

3.8 Material Assets

Wastewater

Based on the EPA's assessment of monitoring information provided by Irish Water and the enforcement activities carried out by the EPA, this report identifies urban areas with the most important environmental issues that must be addressed. There are currently¹² 14 Wastewater Treatment Plants (WWTP) in County Donegal listed as priority areas¹³, where improvements are required to resolve urgent environmental issues, including Merville, Bunrana, Bridgend and Burnfoot located within the area to which the Plan relates.

The area to which the Plan relates is served by combined sewer networks, including septic tanks and sewerage treatment schemes serving agglomerations under 500 P.E. and urban WWTPs. Irish Water in collaboration with Donegal County Council has developed and prioritised a major programme of work which will address deficiencies that exist across the wastewater infrastructure in the county. Settlements within the area to which the Plan relates with proposed wastewater infrastructure and capacity upgrades identified by Donegal County Council include Bunrana, Ballyliffin, Bridgend, Greencastle and Merville.¹⁴

Water Supply

Drinking water supply in the area to which the Plan relates is provided by private and public water supply schemes¹⁵, including the Inishowen Regional Water Supply serving Carndonagh, south of Bunrana¹⁶, Ballyliffin, Greencastle, Malin and Merville, smaller villages and rural hinterlands. The plant sources water from the Eddie Fullerton Pollan Dam¹⁷.

Irish Water in collaboration with Donegal County Council has developed and prioritised a major programme of work, which will address deficiencies that exist across the water supply network and infrastructure. Settlements within the area to which the Plan relates with proposed drinking water infrastructure and capacity upgrades identified by Donegal County Council include Greencastle and Carndonagh.¹⁸ Irish Water is currently preparing a National Water Resources Plan (NWRP)¹⁹ to address urgent issues with the supply and demand for drinking water in Ireland over the short, medium and long term.

Under Section 58 of the Environmental Protection Agency Act 1992, the EPA is required to collect and verify monitoring results for all water supplies in Ireland covered by the European Communities (Drinking Water) Regulations, 2000. The EPA publishes their results in annual reports that are supported by Remedial Action Lists (RALs). The RAL identifies water supplies that are not in compliance with the

¹¹ 17/06/2022 <https://gis.epa.ie/EPAMaps/>

¹² Updated list of priority urban areas (EPA, August 2022)

¹³ Including: Ballintra; Bridgend; Bunrana; Burnfoot; Burtonport; Coolatee; Falcarragh; Kerrykeel; Kilcar; Kilmacreehan; Milford; Merville; Ramelton; and Rathmullan.

¹⁴ Donegal CDP 2018-2024 (as varied)

¹⁵ In rural areas, individual wells are used to serve farms and single houses.

¹⁶ Bunrana's water supply is sourced from Lough Doo and supplied via the Slavery water treatment plant. Water is supplied to the south of the town from the Eddie Fullerton Dam.

¹⁷ Donegal CDP 2018-2024 (as varied)

¹⁸ Donegal CDP 2018-2024 (as varied)

¹⁹ The preparation of the NWRP has been divided into two phases, the combination of which will become the final NWRP. The NWRP Framework Plan (Phase 1) has now been adopted. Phase 2 of the NWRP (four Regional Water Resources Plans), currently in preparation, will address the needs across the 535 individual water supplies and identify the solutions to address these needs. <https://www.water.ie/projects/strategic-plans/national-water-resources/>

Regulations mentioned above. None of the public water supply schemes serving the area to which the Plan relates are listed on the most recent EPA Remedial Action List (Q2 of 2022).

Public Assets and Infrastructure

Settlements across the area to which the Plan relates include Carndonagh, Clonmany, Ballyliffin, Bunrana, Greencastle, Malin and Moville.

The area to which the Plan relates is served by bus, cycle network, regional and strategic roads. The ports and harbours located across the area to which the Plan relates have many functions including transport, fishing, marine leisure and tourism. Ferry routes include Greencastle to Magilligan, Northern Ireland and Bunrana to Rathmullan.

The area to which the Plan relates provides with access to Wild Atlantic Way, the natural environment, Malin Head and other significant cultural, tourism, recreation and sports assets including access to lakes, forests and mountains.

Public assets and infrastructure that have the potential to be impacted upon by the development of tourism related infrastructure, if unmitigated, include resources such as public open spaces, parks and recreational areas; public buildings and services; utility infrastructure (electricity, gas, telecommunications, water supply, wastewater infrastructure etc.). These resources are generally located within the immediate outskirts of urban/suburban areas.

Various provisions relating to material assets have been integrated into the Plan, compliance with which will need to be demonstrated by those seeking or maintaining funding from Fáilte Ireland.

Green Infrastructure

Parks and open space promote health and well-being, provide recreational facilities and range of habitats for various species. Green infrastructure is also a crucial component in building resilient communities capable of adapting to the consequences of climate change with trees, woodlands and wetlands providing carbon capture and slowing water flows while improving air quality.

Forestry

Some parts of the area to which the Plan relates are covered by forestry. Woodlands provide recreational opportunities in addition to their heritage and economic benefits. They are a valuable resource in terms of biodiversity, recreation and tourism, and also important as links in the county's green infrastructure network.

Peatlands

Many parts of the area to which the Plan relates are covered by peatlands. Peatlands provide a valuable natural and archaeological resource. Peatlands are also important controllers of water levels in river catchments, providing a source of water in dry conditions and soaking up excess water during wetter periods; they actively capture and hold carbon and are an important natural resource in combatting climate change. Cutaway bogs have the potential to facilitate land uses such as employment, renewable energy generation, waste management, industrial, and tourism and recreation. Peat soils, such as those found in some parts of the area to which the Plan relates, are often indicative of areas that are the most sensitive to development due to ecological sensitivities and impeded drainage issues. Some of the peatland areas are subject to ecological designations.

Coastline

The coastline and coastal erosion are topics with relevance to various environmental components. Coastlines can be amongst the most sensitive and valuable resources, in terms of natural and cultural heritage, scenic beauty and recreation. The coast is also an important economic resource - particularly for the fishing, aquaculture, leisure and tourism industries. Some of the settlements within the area to which the Plan relates have developed along or near the coast.

Waste Management

Waste management across the area to which the Plan relates is guided by the Connacht-Ulster Region Waste Management Plan 2015-2021. The Connacht Ulster Region comprises: Cavan County Council; Donegal County Council; Galway City Council; Galway County Council; Leitrim County Council; Mayo County Council; Mayo County Council; Monaghan County Council; and Roscommon County Council. The Plan provides a framework for the prevention and management of waste in a sustainable manner.

3.9 Cultural Heritage

Archaeological Heritage

Archaeological heritage is protected under the National Monuments Acts (1930-2004), Natural Cultural Institutions Act 1997 and the Planning Acts. The Record of Monuments and Places (RMP) is an inventory, put on a statutory basis by amendment to the National Monuments Act 1994, of sites and areas of archaeological significance, numbered and mapped.

Various archaeological monuments, including entries to the SMR and RMP, are located within the area to which the Plan relates. Figure 3.4 shows the spatial distribution of recorded monuments and associated SMR Zones of Notification within and surrounding the area to which the Plan relates. Clusters of archaeological heritage are concentrated around the towns and villages across the area to which the Plan relates, including examples of medieval sites such as Celtic crosses, forts and the ruins of several castles. The Inishowen Peninsula, including the area to which the Plan relates, has an important record of archaeological monuments such as: Fort Dunree; Morton God Dolmen; Northburgh Castle; Cooley Cross and Skull House; Carrowmore High Cross; Cloncha High Cross; Temple of Deen; Wee House of Malin; Donagh Cross; Carrickbraghy Castle; St. Columba's Church Straid; O'Doherty's Keep; St. Mura's Cross; and An Grianán of Aileach. These archaeological monuments also include a number of National Monuments in State Care.

Lakes, rivers, estuaries, coastal and transitional waters within and surrounding the area to which the Plan relates, may contain many features and finds associated with maritime/riverine heritage such as shipwrecks, piers, quay walls, fords, stepping stones and associated archaeological objects and features.

Relevant archaeological heritage designations in Northern Ireland include Scheduled Historic Monuments and entries to the Northern Ireland Sites and Monuments Record.

Architectural Heritage

Records of Protected Structures are legislated for under Section 12 and Section 51 of the Planning and Development Act 2000 as amended. Protected structures are defined in the Planning and Development Act 2000 as amended as structures, or parts of structures that are of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view.

Similar to the general spatial spread of archaeological heritage, clusters of architectural heritage are indicated within the area to which the Plan relates, as shown on Figure 3.5. Examples of Protected Structures within the area to which the Plan relates include: churches; houses; railway stations; castles; lighthouses; watch towers; monuments and bridges. Notable structures include: Dunagree Point Lighthouse; Fort Dunree; Bunrana Castle; The Old Fort Inn; Glengannon Bridge; and Kilderry House.

In addition to Protected Structures, the Planning and Development Act, 2000 provides the legislative basis for the protection of Architectural Conservation Areas (ACAs). The ACA designation requires that planning permission must be obtained before significant works can be carried out to the exterior of a structure in the ACA that might alter the character of the structure or the ACA. There are no ACAs designated across the area to which the Plan relates.

Relevant architectural heritage designations in Northern Ireland include Listed Buildings, Defence Heritage and entries to the Industrial Heritage Record.

3.10 Landscape

The area to which the Plan relates covers Inishowen Peninsula, with a diverse and varied landscape from upland mountainous areas to sandy and rocky coastlines. The west of the Peninsula is mountainous with Urris Hills, Minitaghgs and Slieve Sneacht dominating the area. The coastline of the west of the Peninsula is defined by a long stretch of sandy coastline. The north-west coastline varies from sandy beaches to rocky coastal edges and sea cliffs. The north of the Peninsula is almost completely defined by a coastal edge with low-lying land with bog either side and generally following a geological fault line. The east of the Peninsula is also an upland, mountainous landscape dissected by broad and narrow river valleys. The uplands are predominantly peat and bogland. The south of the Peninsula is uphill, with the Scalp Mountain and the Grianan Slopes and gently slopes downwards to lower agricultural lowlands.

The different landscapes found across the area to which the Plan relates have varying visual and amenity values, topography, exposure levels and contain a variety of habitats. Each landscape type has varying capacity to absorb development related to its overall sensitivity.

County Donegal also shares a large area of Seascape with Northern Ireland along the tidal estuary of Lough Foyle (partially located within an area to which the Plan relates) that contains part of the international border.

The Donegal Landscape Character Assessment identified Scenic Amenity areas and Viewpoints. An area to which the Plan relates is characterised into three landscape values, including 'Especially High Scenic Amenity', 'High Scenic Amenity' and 'Moderate Scenic Amenity'. The classifications range from sublime natural landscapes of the highest quality to unique, rural and generally agricultural quality. Areas of "High" and "Especially High" Scenic Amenity are identified mainly around coastal and upland areas. The area to which the Plan relates also contains viewpoints - sites, areas and vantage points from which views over areas of great natural beauty, local landmarks, historic landscapes, may be obtained. The landscape designations provided for by the County Development Plan in force in the area to which the Plan relates must be considered when assessing planning applications.

The area to which the Plan relates in County Donegal borders County Derry in Northern Ireland to the east. Relevant landscape designations in Northern Ireland include an Area of Outstanding Natural Beauty.

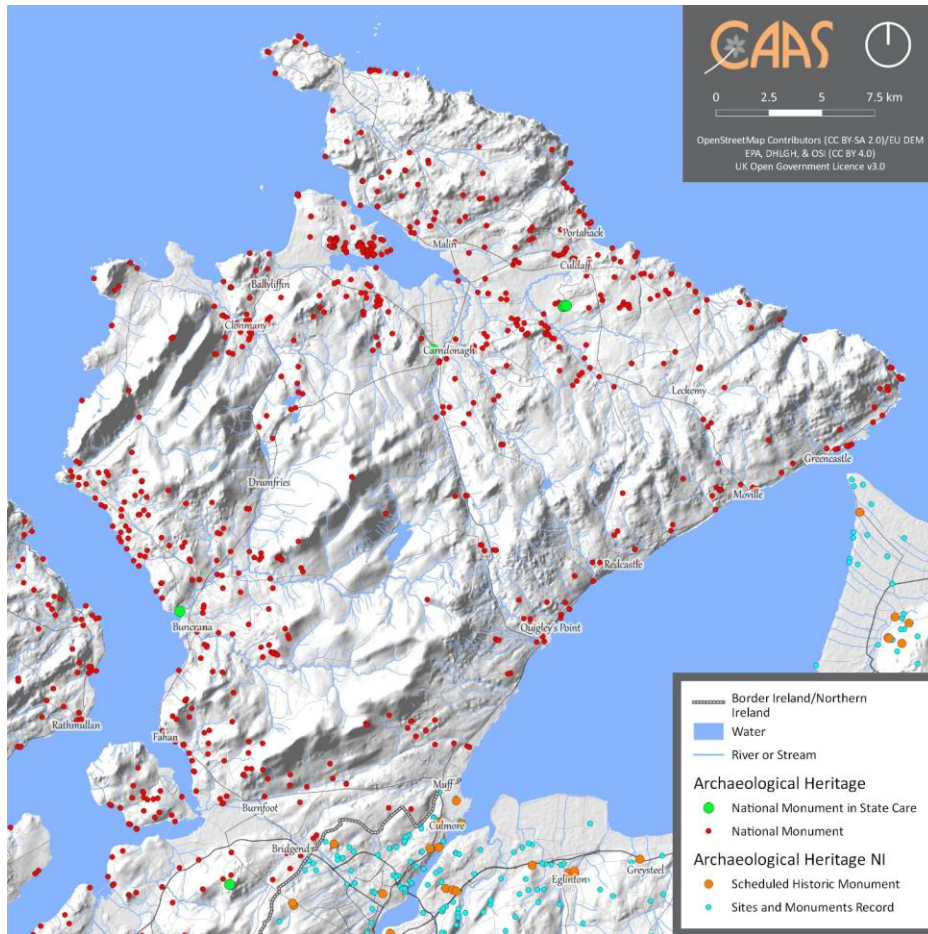


Figure 3.4 Archaeological Heritage

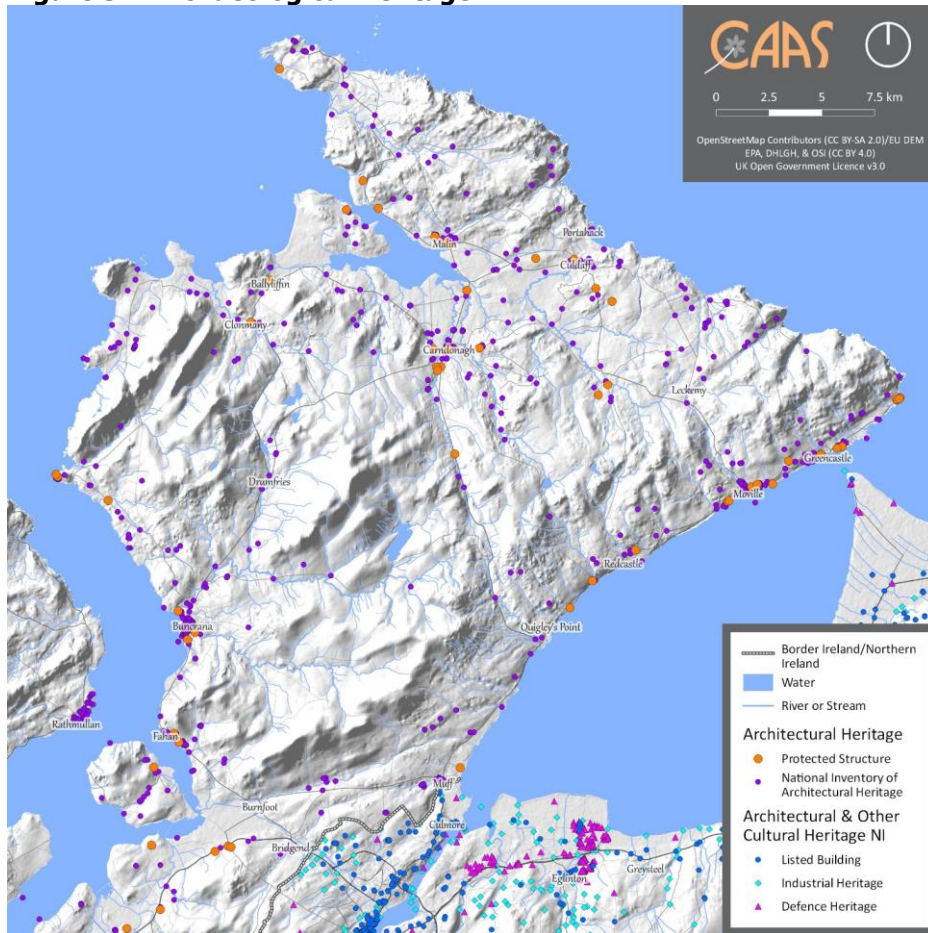


Figure 3.5 Architectural Heritage

3.11 Strategic Environmental Objectives

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. The SEOs are set out under a range of topics and are used as standards against which the provisions of the Plan and the alternatives are evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if - in the case of adverse effects - unmitigated.

Table 3.1 Strategic Environmental Objectives

Environmental Component	Code	Strategic Environmental Objectives
Biodiversity, Flora and Fauna	B1	To contribute towards compliance with the Habitats and Birds Directives with regard to the protection of European sites and Annexed habitats and species ²⁰
	B2	To contribute towards compliance with Article 10 of the Habitats Directive with regard to the management of features of the landscape which - by virtue of their linear and continuous structure or their function act as stepping stones (designated or not) - are of major importance for wild fauna and flora and essential for the migration, dispersal and genetic exchange of wild species
	B3	To contribute towards avoidance of significant impacts on relevant habitats, species, environmental features or other sustaining resources in designated sites including Wildlife Sites ²¹ and to ensure compliance with the Wildlife Acts 1976-2010 with regard to the protection of species listed on Schedule 5 of the principal Act
Population and Human Health	PHH1	To contribute towards the protection of populations and human health from exposure to incompatible landuses
Soil	S1	To minimise land take and loss to extent of soil resource
Water	W1	To contribute towards the maintenance and improvement, where possible, of the quality and status of surface waters
	W2	To contribute towards maintaining and improving, where possible, the chemical and quantitative status of groundwaters
	W3	To contribute towards compliance with the provisions of the Flood Risk Management Guidelines
Air and Climatic Factors	AC1	To contribute towards climate adaptation and mitigation, air quality and noise management objectives.
Material Assets	M1	For development to be served with adequate and appropriate critical infrastructure with sufficient capacity (drinking water, wastewater, waste and transport) that does not present a danger to human health
	M2	To contribute towards the protection of public assets and infrastructure, including that relating to recreation and leisure, transport, utilities and fisheries
	M3	To reduce waste volumes, minimise waste to landfill and increase recycling and reuse
Cultural Heritage	CH1	To contribute towards the protection of archaeological heritage including entries to the Record of Monuments and Places and/or their context
	CH2	To contribute towards the protection of architectural heritage including entries to the Records of Protected Structures and Architectural Conservation Areas and their context
Landscape	L1	To avoid 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

²⁰ 'Annexed habitats and species' refer to those listed under Annex I, II & IV of the EU Habitats Directive and Annex I of the EU Birds Directive.

²¹ The definition of a 'wildlife site' provided by the Planning and Development Act 2000, as amended, includes Natural Heritage Areas (NHAs) and proposed NHAs.

Section 4 Alternatives

4.1 Description of Alternatives

Alternative 1: Business as Usual

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

- Ireland's most northerly point.
- Strong thematic story of time.
- Diversity of coastlines – from the wildness of Malin Head to estuaries and Blue Flag sandy beaches.
- Biodiversity – rich marine wildlife, and migratory and resident birdlife.
- Heritage of early Christianity.
- Diverse maritime and military heritage – strong physical assets – Grianán of Aileach, O'Doherty, castles, Fort Dunree, Malin Head, wealth of ship wrecks.
- Exceptional stories associated with the peninsula's creative heritage.
- Experiences and stories that highlight resilience: Famine Village, emigration story.
- New successful product and internationally acclaimed golf.
- Strong contemporary artisan sector.
- Significant strengths in music.
- Amazing Grace story.
- Land and marine-based hard and soft adventure.
- Community festivals.
- Growing culinary strengths.

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

- High level of seasonality and low length of stay.
- Low dwell time at key attractions.
- Peninsula is too easy to pass by.
- Weak linkages between agencies.
- Fragmented offering – appears to lack critical mass and cohesion – lack of coordination.
- Arts and craft sector lacks a clear market identity.
- Large number of local efforts that have limited visibility as tourism products.
- Weak domestic market prior to COVID-19.
- Examples of tired product and interpretive signage.
- Challenges with potential trails development.
- Concern over growing congestion at Malin Head.
- Weak evening economy.
- Lower international ratings on visual appearance and things to do.
- Low awareness of value of tourism.

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 Inishowen Peninsula 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:

- Position Inishowen 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;
- 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; and
- Protect the natural heritage and special environmental character of the region.

Fáilte Ireland will track progress through a series of performance indicators that will be monitored annually. The existence of compelling and saleable visitor experiences is the vehicle for:

- Increase bed-nights by 2% year over year ahead of national average from year 3 of implementation of this Destination and Experience Development Plan.
- Increase revenue to attractions by 2% ahead of the national average from implementation.
- Increase length of stay.
- Increase in the saleable product (5 new saleable experiences), improved experiences and better distribution.
- Season extension: extend opening hours annually by 5% annually.
- Increased visitor satisfaction – benchmarked through measures such as Net Promoter Score.

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 to be mitigated through that process.

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

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

There would be one layer of mitigation under Alternative, 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 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 Inishowen Peninsula 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 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 2021, 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, 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 Inishowen Peninsula 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 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 Inishowen Peninsula 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 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 (for detailed SEOs please refer to Table 3.1).

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 Selected Alternative for the Plan

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

Section 5 Summary of Effects arising from Plan (including Transboundary)

Table 5.1 Overall Findings – Environmental Effects arising from Plan Provisions

Environmental Component	Environmental Effects, in combination with the existing statutory planning/decision-making and consent-granting framework ²²		
	Significant Positive Effect, likely to occur	Potential Significant Adverse Effect, if unmitigated	Residual Adverse Non-Significant Effects
Biodiversity and flora and fauna	<ul style="list-style-type: none"> • Contribution towards the protection and management of biodiversity and flora and fauna (in designated sites, including European sites and Wildlife Sites, and Annexed habitats and species, listed species, ecological connectivity and non-designated habitats) including through: <ul style="list-style-type: none"> ○ Visitor management strategies; and ○ Plan requirements for environmental protection and management. • Contributes towards the maintenance of existing green infrastructure and its ecosystem services. • Contribution towards protection of biodiversity and flora and fauna as a result of contributing towards the protection of environmental vectors, air, water and soil. 	<p>Arising from both construction and operation of tourism related development/activities:</p> <ul style="list-style-type: none"> • Loss of/damage to biodiversity in designated sites (including European sites and Wildlife Sites) and Annexed habitats and species, listed species, ecological connectivity and non-designated habitats; and disturbance to biodiversity and flora and fauna; • Habitat loss, fragmentation and deterioration, including patch size and edge effects; and • Disturbance (e.g. due to noise and lighting along transport corridors) - and displacement of protected species such as birds and bats. 	<ul style="list-style-type: none"> • Loss of an extent of non-protected habitats and species arising from the replacement of semi-natural land covers with artificial surfaces arising from projects consented through the statutory planning/consent-granting framework. • Losses or damage to ecology (these would be: in compliance with relevant legislation; and mitigated as projects would demonstrate compliance with various environmental protection and management measures)
Population and human health	<ul style="list-style-type: none"> • Contribution towards the protection of human health including through Plan requirements for environmental protection and management. • Contribution towards the protection of human health as a result of not directing additional tourists towards specific locations in instances where significant problems with critical infrastructure (drinking water, wastewater, waste and transport) have been identified. • Contribution towards the protection amenity usage and access. • Contribution towards the sustainable growth of tourism and associated sustenance and growth of communities in the Inishowen Peninsula area. 	<ul style="list-style-type: none"> • Potential interactions if effects upon environmental vectors such as water are not mitigated. • Potential interactions if additional tourists are directed towards specific locations in instances where significant problems with critical infrastructure (drinking water, wastewater, waste and transport) have been identified. 	<ul style="list-style-type: none"> • Potential interactions with residual effects on environmental vectors. This has been mitigated by provisions that have been integrated into the Plan, including those relating to sustainable development, environmental protection and environmental management.

²² Effects include in-combination effects – those arising from services, infrastructure and other development (to service development, including tourism) that are planned for and consented through the statutory framework including the NPF, RSES and lower-tier land use plans. Examples may include developments/operation of developments relating to water services, transport, access or accommodation. Mitigation includes that which has been integrated into the Plan – please refer to Section 9 of this report.

Environmental Component	Environmental Effects, in combination with the existing statutory planning/decision-making and consent-granting framework ²²		
	Significant Positive Effect, likely to occur	Potential Significant Adverse Effect, if unmitigated	Residual Adverse Non-Significant Effects
Soil	<ul style="list-style-type: none"> • Various provisions (e.g. relating to maintaining the wildness of areas that have not yet been developed) help to minimise land-take and loss of extent of soil resource. • Contribution towards the protection of the environment from contamination. • Contributes towards protection of designated sites of geological heritage. 	<ul style="list-style-type: none"> • Adverse impacts upon the hydrogeological and ecological function of the soil resource. • Adverse effects on designated geological heritage sites. • Potential for increase in river bank erosion. 	<ul style="list-style-type: none"> • Loss of an extent of soil function arising from the replacement of semi-natural land covers with artificial surfaces.
Water	<ul style="list-style-type: none"> • Contribution towards the protection of water resources (including the status of surface and groundwaters) and water based designations including through integrating requirements for environmental protection and management into the Plan. • Contribution towards flood risk management and appropriate drainage. 	<ul style="list-style-type: none"> • Adverse impacts upon the status of water bodies and entries to the WFD Register of Protected Areas (ecological and human value), arising from changes in quality, flow and/or morphology. • Increase in flood risk. 	<ul style="list-style-type: none"> • Increased loadings as a result of development to comply with River Basin Management Plan. • Flood related risks remain due to uncertainty with regard to extreme weather events – however such risks will be mitigated by: measures that have been integrated into the Plan; and the statutory planning/consent-granting framework.
Air and climatic factors	<ul style="list-style-type: none"> • Contribution towards climate adaptation and mitigation through measures relating to: <ul style="list-style-type: none"> ◦ Walking and cycling; and ◦ Contribution towards European and national objectives for climate adaptation and mitigation, taking into account a wide range of detailed measures including those relating to resilience. 	<ul style="list-style-type: none"> • Potential conflict, in combination with plans and programmes from all sectors including transport and land use planning, between increases in visitors (which is likely to result in an increase in greenhouse gas emissions and other emissions to air, including from aviation, with associated interactions with climatic factors) and local, national and European objectives to reduce carbon emissions. • Potential conflicts between transport movements, including car movements, and air quality. 	<ul style="list-style-type: none"> • An increase in travel related greenhouse gas and other emissions to air, including from aviation. This has been mitigated by provisions that have been integrated into the Plan, including those relating to sustainable mobility and compliance with the Climate Action Plan 2021, the National Climate Change Adaptation Framework (2018 and any subsequent versions). • Risks remain due to uncertainty with regard to climate and interactions with issues including flooding and material assets.
Material Assets	<ul style="list-style-type: none"> • Contributes towards protection and allows for continued use of public assets and infrastructure. • Contains clear objectives around seasonality and regionality which look not only to spread the benefits of tourism but also the potential impacts/ load associated with tourism. • Helps to minimise likelihood of exceeding capacity in material assets as a result of not directing additional tourists towards specific locations in instances where significant problems with critical infrastructure (drinking water, wastewater, waste and transport) have been identified. 	<ul style="list-style-type: none"> • Increased number of visitors have the potential to increase traffic levels. • The need to provide adequate and appropriate water services (it is the function of Irish Water to provide for such needs). • Increases in waste levels and residual wastes from visitors and construction of developments. • Potential impacts upon public assets and infrastructure. 	<ul style="list-style-type: none"> • Residual wastes to be disposed of in line with higher level waste management policies. • Increased loading on critical infrastructure (drinking water, wastewater, waste and transport) where no significant problems have been identified with this infrastructure. • Exceedance of capacity in critical infrastructure risks remain due to uncertainty with regard to climate – however such risks will be mitigated by: measures that have been integrated into the Plan; and the statutory planning/consent-granting framework.

Environmental Component	Environmental Effects, in combination with the existing statutory planning/decision-making and consent-granting framework ²²		
	Significant Positive Effect, likely to occur	Potential Significant Adverse Effect, if unmitigated	Residual Adverse Non-Significant Effects
	<ul style="list-style-type: none"> Contribution towards compliance with national and regional water services and waste management policies. 		<ul style="list-style-type: none"> Any impacts upon public assets and infrastructure to comply with statutory planning/consent-granting framework.
Cultural Heritage	<ul style="list-style-type: none"> Contribution towards the long-term protection of archaeological and architectural heritage by encouraging greater levels of awareness and appreciation through, use, interpretation and access, in line with the requirements relating to the protection of cultural heritage including: entries to the Record of Monuments and Places and/or their context; and entries to the Records of Protected Structures and Architectural Conservation Areas and their context. 	<ul style="list-style-type: none"> Potential effects on designated and unknown archaeological heritage (including terrestrial and underwater archaeological heritage) arising from land use developments (including infrastructural interventions) and activities (including from visitor footfall). Potential effects on architectural heritage. 	<ul style="list-style-type: none"> Potential alteration to the context and setting of architectural heritage however, these will occur in compliance with legislation. Potential alteration to the context and setting of archaeological heritage however, this will occur in compliance with legislation. Potential loss of unknown archaeology however, this loss will be mitigated by measures integrated into the Plan.
Landscape	<ul style="list-style-type: none"> Contribution towards the protection of landscape designations as a result of: facilitating compliance with relevant plans; and maintaining the wildness of areas that have not yet been developed. 	<ul style="list-style-type: none"> Occurrence of adverse visual impacts, especially in marine, island and ridge areas where, and conflicts with the appropriate protection of statutory designations relating to the landscape. Changes in the appearance of the landscape. 	<ul style="list-style-type: none"> Residual visual effects (these would comply with landscape designation provisions).

Section 6 Mitigation and Monitoring Measures

6.1 Mitigation

Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing the Plan. Various environmental sensitivities and issues have been communicated to Fáilte Ireland through the SEA and Appropriate Assessment (AA) processes.

By integrating all SEA and AA recommendations into the Plan, Fáilte Ireland is helping to ensure that:

- The potential significant adverse effects of implementing the Plan, in combination with implementation of other provisions from the Plan and other plans, programmes, etc., are avoided, reduced or offset; and
- The beneficial environmental effects of implementing the Plan, in combination with implementation of other provisions from the Plan and other plans, programmes, etc., are maximised.

Mitigation was achieved through the following:

- Establishing the status of the Plan and its interrelationship with the Statutory Decision-Making and Consent-Granting Framework²³; and
- Integrating Requirements for Environmental Compliance into the Plan²⁴.

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 Inishowen Peninsula Destination Experience Development 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 Inishowen Peninsula Destination Experience Development Plan does not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent.**

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 compliance²⁵ 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 Inishowen Peninsula Destination Experience Development 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 Inishowen Peninsula Destination Experience Development 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 the existing Donegal County Development Plan 2018-2024 (as varied) and the Seven Strategic Towns Local Area Plan 2018-2024) and that have undergone environmental assessment, as appropriate, including various provisions relating to sustainable development, environmental protection and environmental management²⁶; and

²³ This framework includes various environmental requirements.

²⁴ These requirements include those that have arisen through the SEA and/or AA processes.

²⁵ Demonstration of compliance may be supported by monitoring undertaken by the beneficiary.

²⁶ For more information please refer to Appendix II of this report or the website of the relevant public authority.

- The Climate Action Plan 2021 and the National Climate Change Adaptation Framework (2018 and any subsequent versions)²⁷.

Further measures relating to infrastructure capacity, visitor management, green infrastructure, ecosystem services and climate change have been integrated into the Plan.

6.2 Monitoring

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. Monitoring is based around indicators that allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives identified at Table 3.1 and used in the evaluation.

Sources

Confirmation of compliance with relevant environmental measures 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:

- 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 Inishowen Peninsula Destination Experience Development Plan area in order to monitor any effects of visitors;
- Sources maintained by Donegal 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.

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 DEDP 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 6.1 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.

²⁷ For more information please refer to Section 4.10 and/or Appendix II of this report or the website of the relevant public authority.
CAAS for Fáilte Ireland

Table 6.1 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 ²⁸	<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 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 (S.I. No. 272 of 2009) W1ii: Mandatory and Guide values as set by the EU Bathing Water Directive and transposing Bathing Water Quality Regulations (S.I. No. 79 of 2008)	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 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	<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	

²⁸ 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.

SEA Environmental Report Appendix III: Non-Technical Summary

Environmental Component	Indicators	Targets	Source and (where available) Frequency
	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	
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 Donegal County Council • 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 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) • Input from any other existing or replacement Fáilte Ireland monitoring programmes