

AA CONCLUSION STATEMENT

IN SUPPORT OF THE
APPROPRIATE ASSESSMENT
OF THE
**WILD ATLANTIC WAY OPERATIONAL PROGRAMME
2015-2019**

IN ACCORDANCE WITH THE REQUIREMENTS OF
ARTICLE 6(3) OF THE EU HABITATS DIRECTIVE

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August 2015

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Section 1 Introduction and Background

1.1 Introduction

This is the Appropriate Assessment (AA) Conclusion Statement for the Fáilte Ireland Wild Atlantic Way Operational Programme.

The obligation to undertake AA derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC as transposed into Irish legislation by the European Communities (Birds and Natural Habitats) Regulations 2011. AA is a focused and detailed impact assessment of the implications of a strategic action (such as a plan or programme) or project, alone and in combination with other strategic actions and projects, on the integrity of a Natura 2000 site in view of its conservation objectives.

This AA Conclusion Statement should be read in conjunction with the following documents:

- Wild Atlantic Way Operational Programme;
- Natura Impact Report (NIR), including Appendix I 'Further Detail on Designated Sites'; and
- Strategic Environmental Assessment (SEA) Environmental Report, including Appendix I 'Report on Submissions'.

1.2 Legislative Requirements in relation to AA

In carrying out the AA for the Operational Programme, the European Communities (Birds and Natural Habitats) Regulations 2011 require, inter alia, that Fáilte Ireland take into account the matters arrayed in the first column on Table 1 below. The second column identifies how these issues have been addressed.

Table 1: Matters taken into account by the AA

Matter specified by the Regulations	How addressed by AA
(a) the NIR	A NIR accompanies this AA Conclusion Statement and the Operational Programme
(b) any other plans or projects that may, in combination with the plan or project under consideration, adversely affect the integrity of a European Site (see Section 2)	See Section 2.6 of the NIR
(c) any supplemental information furnished in relation to any such report or statement	This AA Conclusion Statement supplements the NIR which is also accompanied by an Appendix (NIR Appendix I) which provides additional detail on Natura 2000 sites
(d) if appropriate, any additional information sought by the authority and furnished by the applicant in relation to a Natura Impact Statement	The Natura Impact Report has taken into account submissions received during the Operational Programme/AA preparation process – see Report on Submissions (Strategic Environmental Assessment Appendix I)
(e) any information or advice obtained by the public authority	
(f) if appropriate, any written submissions or observations made to the public authority in relation to the application for consent for proposed plan or project	
(g) any other relevant information	

In addition to the above, the regulations requires that Fáilte Ireland makes available for inspection a determination regarding the outcome of the assessment with respect to effects on the integrity of European sites (such a determination is provided at Section 5 'Conclusion' of the Natura Impact Report and Section 1 of this document).

1.3 AA Conclusion Statement

The Department of Arts, Heritage and the Gaeltacht's Non-Statutory AA guidance states that (Section 4.14) it *"is recommended that planning authorities include a clear and discrete AA Conclusion Statement as a distinct section in the written statement of the plan separate to the SEA statement."*

This guidance recommends that the following issues are addressed by the AA:

- Summary of how the findings of the AA were factored into the plan
- Reasons for choosing the plan as adopted, in the light of other reasonable alternatives considered as part of the AA process;
- A declaration that the plan as adopted will not have an adverse effect on the integrity of a Natura 2000 site or sites; and
- The Natura Impact Statement (the Natura Impact Report).

As recommended, this AA Conclusion Statement addresses the above issues.

Section 2 How the findings of the AA were factored into the Operational Programme

2.1 Overview

The findings of the AA were factored into the Operational Programme by:

- Early and ongoing consultation with environmental authorities on AA issues. The EPA and DAHG made themselves available for numerous meetings from an early stage in the process. Written submissions and recommendations made at various meetings and while the Draft Operational Programme and associated documents were on public display helped in the development and refinement of the Operational Programme and the scope of the AA.
- Early consideration of and integration of AA findings into alternatives and ultimately into the Operational Programme.
- Following an iterative Approach to Preparation of the Operational Programme whereby AA findings were communicated to the Fáilte Ireland and integrated into the Operational Programme through the AA processes. The drafting of the Operational Programme was done in an iterative manner whereby Fáilte Ireland prepared the first draft of the Programme which was provided to CAAS who made suggestions for integration into the Programme. Fáilte Ireland then reviewed the Programme to take account of the AA (and SEA) suggestions and sent the following revision back to CAAS for comment. Multiple revisions of the Programme were prepared before the Draft Programme was arrived at for public display. The Draft Programme and associated AA (and SEA) documents were updated to take account of various issues raised in submissions made during public display.

Key aspects of the Operational Programme where AA findings were factored into the Operational Programme include:

- Visitor management;
- A focus on paid bednights rather than visitors;
- The Programme's Environmental Management and Sustainability Strategy; and
- The Programme's detailed Monitoring Strategy and Guidelines for Local Authorities.

2.2 Monitoring Strategy and Guidelines for Local Authorities

- The development of a detailed Monitoring Strategy which is currently being implemented and will produce various data including an indication of the types of impacting activities at Signature Discovery Points and control sites (and the extent of existing or potential ecological effect zones, if present) and the type of mitigation responses which may be required.
- The route and the candidate Discovery Points may change if the environmental monitoring strategy in particular locations produces results that show that visitor activity and/or visitor intensification is predicted or observed to result in a negative impact on the environment as a result of the Wild Atlantic Way. For this reason, a mid-term review of the route and the candidate Discovery Points has been built into the Operational Programme. The Monitoring Strategy is included as an Appendix to the Operational Programme.
- Findings from the Environmental Monitoring will be used to inform Local Authorities, through the publication of a set of guidelines, on the nature and extent of any proposed interventions at candidate Discovery Points and candidate Signature Discovery Points in order to improve visitor

management at these sites, where appropriate. The guidelines will be prepared in consultation with the Environmental Authorities.

- Central to the monitoring of the Operational Programme will be the establishment of a Monitoring Group. This establishment is provided for by the Operational Programme on foot of submissions from various environmental authorities including the National Parks and Wildlife Service and the Environmental Protection Agency. The establishment of the Monitoring Group is to ensure that robust systems are in place, in appropriate existing authorities, to ensure that all key commitments made at the Programme level will be delivered effectively (including at the appropriate time), and to ensure that no adverse effects on the integrity of the environment will result.
- Findings for the Environmental Monitoring will be used to identify, assess and inform relevant environmental authorities about existing and emerging environmental effects that should be addressed to improve conformity with Fáilte Ireland's brand promise of experiencing a 'Wild' Ireland. This will also contribute towards the meeting of other planning and environmental requirements.

2.3 AA Natura Impact Report

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

Responses to submissions made on the Natura Impact Report during the period of public display were integrated into a Report on Submissions and considered by Fáilte Ireland.

The Natura Impact Report was updated in order to take account of recommendations included in the submissions as well as changes which were made to the original Draft Programme that was placed on public display.

Changes to the original Draft Programme that was placed on public display were examined for the need to undertake AA. It was determined that the changes would not impact upon the Natura 2000 network of sites.

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

The AA Natura Impact Report accompanies the Operational Programme and this AA Conclusion Statement.

Table 2: Provisions arising from AA (and SEA) findings contained in Operational Programme Appendix 'Environmental Management for Local Authorities and Others'

Requirement including ¹	Means by which requirement addresses potential impacts on European sites
<p>Regulatory framework for environmental protection and management Local authorities and others shall cumulatively contribute towards – in combination with other users and bodies – the achievement of the objectives of the regulatory framework for environmental protection and management. Local authorities and others will demonstrate, as appropriate, that plans, programmes and projects comply with EU Directives - including the Habitats Directive (92/43/EEC, as amended), the Birds Directive (2009/147/EC), the Environmental Impact Assessment Directive (85/337/EEC, as amended) and the Strategic Environmental Assessment Directive (2001/42/EC) – and relevant transposing Regulations.</p>	<p>Contribution toward these directives and regulations will further contribute to the protection of designated European sites potentially affected by the Operational Programme.</p>
<p>Information to be considered by local authorities and others at lower levels of decision making and environmental assessment Lower levels of decision making and environmental assessment by local authorities and others, as relevant, should consider the sensitivities identified in Section 4 of the SEA Environmental Report, including the following:</p> <ul style="list-style-type: none"> • Candidate Special Areas of Conservation and Special Protection Areas; • Features of the landscape that provide linkages/connectivity to designated sites (e.g. watercourses, areas of semi-natural habitat such as linear woodlands etc) • Salmonid Waters; • Shellfish Waters; • Freshwater Pearl Mussel catchments; • Nature Reserves; • Natural Heritage Areas and proposed Natural Heritage Areas; • Areas likely to contain a habitat listed in annex 1 of the Habitats Directive; • Entries to the Record of Monuments and Places and Zones of Archaeological Potential; • Entries to the Record of Protected Structures; • Un-designated sites of importance to wintering or breeding bird species of conservation concern; • Architectural Conservation Areas; and • Relevant landscape designations. 	<p>The identification of existing infrastructure corridors would assist in determining those areas that are likely to be least sensitive to ecological impacts.</p>
<p>Construction and Environmental Management Plan Construction Environment Management Plans (CEMPs) shall be prepared in advance of the construction of larger projects and implemented throughout. Such plans shall incorporate relevant mitigation measures indicated in this Appendix to the Operational Programme and any lower tier Environmental Impact Statement or Appropriate Assessment. CEMPs typically provide details of intended construction practice for the proposed development, including:</p> <ol style="list-style-type: none"> a. location of the sites and materials compound(s) including area(s) identified for the storage of construction refuse, b. location of areas for construction site offices and staff facilities, c. details of site security fencing and hoardings, d. details of on-site car parking facilities for site workers during the course of construction, e. details of the timing and routing of construction traffic to and from the construction site and associated directional signage, f. measures to obviate queuing of construction traffic on the adjoining road network, g. measures to prevent the spillage or deposit of clay, rubble or other debris, h. alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public right of way during the course of site development works, i. details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels, j. containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained; such bunds shall be roofed to exclude rainwater, k. disposal of construction/demolition waste and details of how it is proposed to manage excavated soil, l. a water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains, m. details of a water quality monitoring and sampling plan. n. if peat is encountered - a peat storage, handling and reinstatement management plan. o. measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed). p. appointment of an ecological clerk of works at site investigation, preparation and construction phases. 	<p>The development of a CEMP will ensure that relevant mitigation measures from lower level SEA and AA will be adhered to during the development and operational phases. The CEMP will also ensure that best practice construction methods are adopted throughout the development of the Plan.</p> <p>The inclusion of a CEMP will safeguard the integrity of the Natura 2000 network of sites by minimising the potential for habitat loss, disturbance of species and potential adverse impacts on water quality/quantity dependant sites.</p>

¹ The provisions listed under this column are the requirements which the local authorities and others will have to comply with in order to get funding.

Requirement including ¹	Means by which requirement addresses potential impacts on European sites
<p>Maintenance Plan Lower tier assessments should examine the need for Maintenance Plans informed by environmental considerations to be prepared and implemented.</p>	<p>The development of Maintenance Plans will ensure that works/developments to be undertaken will comply with relevant environmental legislation and that works will be carried out in an ecologically sensitive manner.</p>
<p>Protection of Biodiversity including Natura 2000 Network Local authorities and others shall contribute, as appropriate, towards the protection of designated ecological sites including candidate Special Areas of Conservation (cSACs) and Special Protection Areas (SPAs); UNESCO World Heritage and UNESCO Biosphere sites; Ramsar Sites; Salmonid Waters; Shellfish Waters; Freshwater Pearl Mussel catchments; Flora Protection Order sites; Wildlife Sites (including Nature Reserves); Certain entries to the Water Framework Directive Register of Protected Areas; Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs); Wildfowl Sanctuaries (see S.I. 192 of 1979) ; and Tree Preservation Orders (TPOs). Local authorities and others shall demonstrate compliance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including the following and any updated/superseding documents):</p> <ul style="list-style-type: none"> • EU Directives, including the Habitats Directive (92/43/EEC, as amended)², the Birds Directive (2009/147/EC)³, the Environmental Liability Directive (2004/35/EC)⁴, the Environmental Impact Assessment Directive (85/337/EEC, as amended), the Water Framework Directive (2000/60/EC) and the Strategic Environmental Assessment Directive (2001/42/EC). • National legislation, including the Wildlife Act 1976⁵, the European Communities (Environmental Impact Assessment) Regulations 1989 (SI No. 349 of 1989) (as amended), the Wildlife (Amendment) Act 2000, the European Union (Water Policy) Regulations 2003 (as amended), the Planning and Development Act 2000 (as amended), the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011), the European Communities (Environmental Liability) Regulations 2008⁶ and the Flora Protection Order 1999. • National policy guidelines (including any clarifying Circulars or superseding versions of same), including the Landscape and Landscape Assessment Draft Guidelines 2000, the Environmental Impact Assessment Sub-Threshold Development Guidelines 2003, Strategic Environmental Assessment Guidelines 2004 and the Appropriate Assessment Guidance 2010. • Catchment and water resource management Plans, including River Basin District Management Plans 2009-2015 (including any superseding versions of same). • Biodiversity Plans and guidelines, including Actions for Biodiversity 2011-2016: Ireland's 2nd National Biodiversity Plan (including any superseding version of same). • Ireland's Environment 2014 (EPA, 2014, including any superseding versions of same), and to make provision where appropriate to address the report's goals and challenges. 	<p>Contribution towards these Directives and Regulations will further contribute to the protection of European sites potentially affected by the Operational Programme.</p>
<p>Appropriate Assessment All projects and plans arising from this programme will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and a Stage 2 Appropriate Assessment where necessary, that:</p> <ol style="list-style-type: none"> 1. The Plan or project will not give rise to significant adverse direct, indirect or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or 2. The Plan or project will have significant adverse effects on the integrity of any European site (that does not host a priority natural habitat type/and or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement 	<p>The need for appropriate assessment at project level will minimise potential impacts on European sites and will ensure that no projects giving rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites which may lead to adverse effects shall be permitted on the basis of this Programme (either individually or in combination with other plans or projects).</p>

² Including Annex I habitats, Annex II species and their habitats and Annex IV species and their breeding sites and resting places (wherever they occur). Note that the NPWS provide sensitive areas mapping for Freshwater Pearl Mussels which are listed under Annex II of the Directive.

³ Including Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur).

⁴ Including protected species and natural habitats.

⁵ Including species of flora and fauna and their key habitats.

⁶ Including protected species and natural habitats.

Requirement including ¹	Means by which requirement addresses potential impacts on European sites
<p>to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or</p> <p>3. The Plan or project will have a significant adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000.</p>	
<p>Protection of Natura 2000 Sites No projects giving rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this programme (either individually or in combination with other plans or projects⁷).</p>	<p>This provision will ensure the protection of European sites during project level development.</p>
<p>NPWS & Integrated Management Plans Regarding, integrated management plans, Article 6(1) of the Habitats Directive requires that Member States establish the necessary conservation measures for Special Area of Conservation involving, if need be, appropriate management plans specifically designed for the sites or integrated into other development plans. The NPWS's current priority is to identify site specific conservation objectives; management plans may be considered after this is done.</p> <p>Where Integrated Management Plans are being prepared for all Natura sites (or parts thereof), Fáilte Ireland and local authorities shall engage with the National Parks and Wildlife Service in order to ensure that plans are fully integrated with the Operational Programme and other plans and programmes, with the intention that such plans are practical, achievable and sustainable and have regard to all relevant ecological, cultural, social and economic considerations and with special regard to local communities.</p>	<p>The integration of Natura 2000 site management plans will further contribute to the safeguarding of the Natura 2000 network of sites during the Programmes implementation.</p>
<p>Coastal Zone Management Local authorities and others shall demonstrate that works will be undertaken in accordance with best practice and local authorities and others shall, as appropriate: support measures to protect the coast, the coastal edge and coastal habitats; and facilitate an Integrated Coastal Zone Management approach to ensure the conservation, management and projection of man-made and natural resources of the coastal zone.</p>	<p>Coastal Zone Management will ensure the protection of sensitive coastal habitats which occur along the stretch of the route.</p>
<p>Biodiversity and Ecological Networks Local authorities and others shall demonstrate, as appropriate, protection and enhancement of biodiversity and ecological connectivity, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, geological and geo-morphological systems, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones in the context of Article 10 of the Habitats Directive.</p>	<p>The inclusion of this provision will mitigate against fragmentation resulting from the implementation of the Programme.</p>
<p>Protection of Riparian Zone and Waterbodies and Watercourses Local authorities and others shall demonstrate that waterbodies and watercourses are protected from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. This will include protection buffers in riverine, wetland and coastal areas, as appropriate.</p>	<p>The inclusion of this provision will safeguard European sites against habitat loss, fragmentation, disturbance to key species, and impacts on water dependant habitats and species.</p>
<p>Non-Designated Sites Local authorities and others shall demonstrate the appropriate protection of non-designated habitats and landscapes and to conserve the biological diversity.</p>	<p>The inclusion of this provision will safeguard European sites against fragmentation.</p>
<p>Non-native invasive species Local authorities and others shall support, as appropriate, the National Parks and Wildlife Service's efforts to seek to control the spread of non-native invasive species on land and water.</p>	<p>The control of invasive species will safeguard European sites against habitat loss and impacts on water dependant habitats and species.</p>
<p>Water Framework Directive and associated legislation</p>	<p>Contribution towards these</p>

⁷ Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:

- a) no alternative solution available,
- b) imperative reasons of overriding public interest for the project to proceed; and
- c) Adequate compensatory measures in place.

Requirement including ¹	Means by which requirement addresses potential impacts on European sites
<p>Local authorities and others shall contribute towards, as appropriate, the protection of existing and potential water resources, and their use by humans and wildlife, including rivers, streams, wetlands, groundwater, coastal waters and associated habitats and species in accordance with the requirements and guidance in the EU Water Framework Directive 2000 (2000/60/EC), the European Union (Water Policy) Regulations 2003 (as amended), the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (SI No. 272 of 2009), the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (groundwater) Regulations, 2010 (S.I. No. 9 of 2010) and other relevant EU Directives, including associated national legislation and policy guidance (including any superseding versions of same). Local authorities and others shall support the application and implementation of a catchment planning and management approach to development and conservation, including the implementation of Sustainable Drainage System techniques for new development.</p>	<p>Directives and Regulations will further contribute to the protection of European sites potentially affected by the Operational Programme.</p>
<p>River Basin Management Plan Local authorities and others shall support the implementation of the relevant recommendations and measures as outlined in the various River Basin Management Plans 2009 – 2015, and associated Programmes of Measures, or any such plans that may supersede same during the lifetime of the Operational Programme, as well as relevant recommendations contained in the Water Quality in Ireland 2007 – 2009 (EPA, 2011, and any updated/superseding document). Local authorities and others shall demonstrate that proposals for development would not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands and coastal waters. Also local authorities and others shall have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Document No. 20 which provides guidance on exemptions to the environmental objectives of the Water Framework Directive.</p>	<p>Contribution towards this Plan will further contribute to the protection of European sites potentially affected by the Operational Programme.</p>
<p>Flood Risk Management Guidelines Local authorities and others shall support, as appropriate, in co-operation with the OPW, the implementation of the EU Flood Risk Directive (2007/60/EC), the Flood Risk Regulations (SI No. 122 of 2010), the DEHLG/OPW publication <i>The Planning System and Flood Risk Management Guidelines</i> (2009) (including any clarifying Circulars or superseding versions of same) and relevant outputs of the Catchment and Flood Risk Assessment and Management Studies (CFRAMS). Surface Water Drainage and Sustainable Drainage Systems (SuDs) Local authorities and others shall ensure that new development is adequately serviced with surface water drainage infrastructure and promote the use of Sustainable Drainage Systems as appropriate.</p>	<p>These measures will further contribute to the protection of European sites potentially affected by the Operational Programme.</p>
<p>Infrastructure for Walking, Cycling and Water-based activities Local Authorities and others shall work with Fáilte Ireland, the National Trails Office, Coillte, the Department of the Environment, Heritage and Local Government and the Department of Transport, Tourism and Sport, and other relevant stakeholders, to improve on the existing level of infrastructure and facilities for walking, cycling and water-based activities along the Wild Atlantic Way.</p>	<p>Improvements to the existing level of infrastructure along the route may potentially lead to adverse impacts on European sites. The provision to work with the relevant environmental stakeholders will ensure that infrastructural developments are developed in an ecologically sensitive manner, therefore safeguarding the integrity of the Natura 2000 network.</p>
<p>Construction Waste Local authorities and others shall demonstrate that all waste arising during construction phase will be managed and disposed of in a way that ensures the provisions of the Waste Management Acts and regulations and Regional Waste Management Plans. Construction Waste Management Plans will be implemented by local authorities and others to minimise waste and ensure correct handling and disposal of construction waste streams in accordance with the Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects, Department of the Environment, July 2006. Waste Creation Local authorities and others shall support the minimisation of waste creation and promote a practice of reduce, reuse and recycle where possible. Waste Disposal Local authorities and others shall safeguard the environment by seeking to ensure that residual waste is disposed of appropriately.</p>	<p>Competent waste management will further contribute to the protection of European sites potentially affected by the Operational Programme.</p>

Section 3 Reasons for choosing the plan as adopted, in the light of other reasonable alternatives considered as part of the AA process

3.1 Option 1: Continuation of Uncoordinated Approach

Various alternatives for the Programme were considered as summarised below. The AA process informed this consideration of alternatives which was mainly communicated through the Strategic Environmental Assessment process.

3.2 Option 1: Continuation of Uncoordinated Approach

This option would involve continued uncoordinated maintenance, repair and development of tourism projects over 35 touring routes.

This option would not contribute towards improvements in environmental management and protection – including protection and management of Natura 2000 sites – and would be the most likely option whereby significant residual adverse environmental effects would occur, including on Natura 2000 sites.

There would be little or no management of visitors:

- At a macro spatial level in terms of what sections of the western seaboard could accommodate increases in visitors;
- At a micro spatial level in terms of what areas adjacent to viewing points, lay-bys etc. should be avoided; and
- In terms of time; it is likely that the summer peak would be accentuated.

This lack of coherent planning and management would have the potential to contribute towards increasing stresses on sensitive environments (including ecology and Natura 2000 sites) and infrastructure.

In addition to the above, Fáilte Ireland considered that pursuing this option would not result in a sufficient disruption of the downward trend in overseas bed nights and revenue that was the case at the time. It was this 'status quo' option that had been in force when the decline occurred so there is no evidence to suggest that it would have the ability to arrest or reverse the decline.

3.3 Option 2: Further Growth of Popular Centres

This option would: focus growth currently popular centres with the objective of making them more popular; and involve the development of a single attraction of sufficient scale to focus attention on the west coast.

The Programme for this option would theoretically present an opportunity to contribute towards improvements in environmental management and protection, including protection and management of Natura 2000 sites; however this opportunity would be severely constrained by the main objective of the Programme, focusing visitors into currently popular locations. It is unlikely that real improvements in environmental management and protection would be achieved.

Visitors would be directed to the most popular locations along the most popular sections of the western seaboard. This would lead to the need to develop clusters of new viewing points and associated

developments – potentially including new and improved access roads. The construction of these new developments would present potential adverse environmental effects (including ecology and Natura 2000 sites) which would be concentrated in the most popular locations. Significant increases in pressure upon sensitive environments (including ecology and Natura 2000 sites) and increases in demand on infrastructure could lead to direct, indirect and cumulative environmental effects in these locations.

The Programme could mitigate impacts by managing visitors across the tourist season so that growth is sought in times outside of the summer peak; the extent to which this would be successful is uncertain due to the focus on a small number of already popular locations as well as a single attraction of sufficient scale to focus attention on the west coast.

In addition to the above, Fáilte Ireland considered such an approach would not provide a solution for the entire western seaboard and would not have the ability to sufficiently disrupt the geographical seasonal inequities that currently exist along the west coast. It was also considered that it would be more appropriate as part of a tourism development strategy for a large urban centre, as the Titanic Visitor Centre was for Belfast.

3.4 Option 3: Single Overarching Brand - Coastal Touring Routes

Options 3a, 3b and 3c provide for a single, overarching brand for the west of Ireland comprising a touring route.

Option 3a: Greenway Route

By providing for the development of a single walking route or greenway (including cycling), this route would contribute towards increases in sustainable mobility and reductions in travel related emissions to air.

The Programme for this option would present an opportunity to contribute towards improvements in environmental management and protection – including protection and management of Natura 2000 sites – by allowing for both: the management of visitors at a macro spatial level (in terms of what sections of the western seaboard could accommodate increases in visitors); and the management of visitors at a micro spatial level (in terms of what areas adjacent to viewing points, lay-bys etc. should be avoided). This option would also allow for the management of visitors across the tourist season so that growth could be sought in times outside of the summer peak. There would be potential for success in this regard due to the wide extent of the route.

The above management of visitors would have the potential to both: contribute towards the protection of sensitive environments (including ecology and Natura 2000 sites) by minimising potential stresses; and avoid increases in infrastructural demand during the summer peak season.

The development of pathways and cycleways under this option would result in potential adverse environmental effects with respect to various environmental components (including ecology and Natura 2000 sites); careful route selection and legislative compliance would be required in order to ensure that effects are mitigated. Under this option existing and planned walkways and greenways of local authorities could be integrated into the route.

In addition to the above, Fáilte Ireland identified that this option would constitute a significant level of new development in terms of cycleways and, therefore, presented a barrier to the launch of the brand in 2014 (on-road cycling routes would not satisfy the needs or expectations of Ireland's core overseas markets). Other issues identified included land ownership and the possible requirement to seek planning permission, neither of which were insurmountable in principal, but not within the timescale allowed. It is noted that the Operational Programme supports improvements by local authorities and others to the existing level of infrastructure and facilities for walking, cycling and water-based activities along the Wild Atlantic Way.

Once it was decided that the first manifestation of the Wild Atlantic Way brand would be a branding of the existing roads along the west coast from County Donegal to County Cork, a further two sub-options (3b and 3c) were considered.

Option 3b: Most Scenic Driving Routes only

By only including roads that are most scenic or which have largely unbroken views of the coast this option would contribute towards the intensification of visitors in already popular areas.

The Programme for this option would present an opportunity to contribute towards improvements in environmental management and protection – including protection and management of Natura 2000 sites; however this opportunity would be constrained to some degree by focusing visitors into already popular areas where the roads are most scenic or have unbroken coastal views. Some management of visitors would be possible at a macro spatial level (in terms of what areas and roads could accommodate increases in visitors) and at a micro spatial level (in terms of what areas adjacent to viewing points, lay-bys etc. should be avoided). This option would allow for some management of visitors across the tourist season so that growth could be sought in times outside of the summer peak.

The above management of visitors would have the potential to both: contribute towards the protection of sensitive environments (including ecology and Natura 2000 sites) by reducing potential stresses in some areas; and reduce increases in infrastructural demand during the summer peak season.

Visitors would be directed to roads that are most scenic or which have largely unbroken views of the coast (in already popular areas). This may lead to the need to develop viewing points and associated developments – potentially including new and improved access roads. The construction of these new developments would present potential adverse environmental effects. Focusing growth could result in significant increases in pressure upon sensitive environments (including ecology and Natura 2000 sites) and increases in demand on infrastructure, leading to direct, indirect and cumulative environmental effects in these locations.

In addition to the above, Fáilte Ireland identified that this option might only serve to intensify visitors in already popular areas and might not achieve one of the goals of the initiative, namely to spread visitor bed nights and revenue into areas where there is under-utilised capacity.

Option 3c: Single, Continuous Route⁸

This option maximises the use existing infrastructure as the route would be aligned to existing roads only.

With a route extending along the entire western seaboard (and with the prospect of including a number of loops inland off the main spine within the first five years of operation), the Programme for this option would present an opportunity to contribute towards improvements in environmental management and protection – including protection and management of Natura 2000 sites – by allowing for both: the management of visitors at a macro spatial level (in terms of what sections of the western seaboard could accommodate increases in visitors); and the management of visitors at a micro spatial level (in terms of what areas adjacent to viewing points, lay-bys etc. should be avoided). This option would also allow for the management of visitors across the tourist season so that growth could be sought in times outside of

⁸ The delineation of the Wild Atlantic Way Route under this alternative was informed by a Route Identification process, the findings of which were included in a “WAW (Initial) Route Identification Report” (2013, Hogarts on behalf of Fáilte Ireland). Road capacity and safety were key criteria considered in the identification of the Route. The following lists the groups of criteria taken into account in the identification of the route:

1. Accessibility and Capacity of the Route
2. Scenic Quality of the Route
3. Points of Interest along the Route
4. Human Influences
5. Culture
6. Sports and Activities

the summer peak. There would be potential for success in this regard due to the wide extent of the route.

The above management of visitors would have the potential to both: contribute towards the protection of sensitive environments (including ecology and Natura 2000 sites) by minimising potential stresses; and avoid increases in infrastructural demand during the summer peak season.

Road capacity and safety were key criteria for this option: roads for this option had to already have the capacity to take two-way car, camper van and minibus traffic, and separate sections of the route were identified for coaches, as appropriate. By using existing roads for this option which do not need to be upgraded, potential adverse effects would be avoided.

Within Option 3c 'Single, Continuous Route' there are three sub-options for the provision of Discovery Points (viewing points and lay-bys) as follow:

3c (i) No Discovery Points, continuation of uncoordinated tourism projects

The option allows for the continuation of new, uncoordinated tourism projects along the western seaboard undertaken by a variety of local groups, private landowners and local authorities. This would result in the proliferation of viewing points, lay-bys and a variety of associated developments along the entirety of the route.

Impacts and mitigation would not be considered for these projects along the western seaboard as a whole, only on a case by case basis where works are part of formal consenting procedures.

This lack of coherent planning and management would have the potential to:

- Contribute towards increasing stresses on sensitive environments (including ecology and Natura 2000 sites); and
- Reduce the effectiveness of visitor management and associated positive effects on the management and protection of the environment – including protection and management of Natura 2000 sites.

3c (ii) New Discovery Points

This option facilitates a coordinated set of new Discovery Points along the route.

Impacts and mitigation could be considered along the western seaboard as a whole, through the SEA, as well as at lower tiers of environmental assessment and decision making.

The development of new Discovery Points would have the potential to adversely affect environmental sensitivities such as those relating to ecology and Natura 2000 sites. Such effects could be mitigated through the SEA process.

The coordination would have the potential to maximise the effectiveness of visitor management and associated positive effects on the management and protection of the environment – including protection and management of Natura 2000 sites.

3c (iii) Restriction of new development, Limit in number of Discovery Points

This option facilitates a restriction of new development and limits the number of Discovery Points. There is an emphasis on re-use and reinforcement of existing infrastructure and there is an application of design guidelines to contribute towards the protection of the environment – including protection of Natura 2000 sites –.

New works, e.g. reuse and reinforcement, at existing Discovery Points would have the potential to adversely affect environmental sensitivities such as those relating to ecology and Natura 2000 sites. Such effects could be mitigated through the SEA process including the application of design guidelines.

Impacts and mitigation could be considered along the western seaboard as a whole, through the SEA, as well as at lower tiers of environmental assessment and decision making.

The coordination provided for by this option would have the potential to maximise the effectiveness of visitor management and associated positive effects on the management and protection of the environment – including protection and management of Natura 2000 sites.

3.5 The Selected Alternative

The option selected for the development of the Operational Programme comprises: 3c: Single, Continuous Route; (iii) Restriction of new development, Limit in number of Discovery Points.

This alternative is one of the options which would improve the protection and management of the environment – including protection and management of Natura 2000 sites –, as well as having the least extent of potential adverse effects (including those relating to ecology and Natura 2000 sites). By complying with appropriate mitigation measures - including those which have been integrated into the Operational Programme – potentially significant adverse environmental effects (including those relating to ecology and Natura 2000 sites) which could arise as a result of implementing the Programme would be likely to be avoided, reduced or offset. Residual adverse environmental effects would be non-significant and having incorporated suggested mitigation measures this alternative will not impact on the Natura 2000 network of sites.

Section 4 Determination

Stage 1 Screening and Stage 2 AA of the WAW Operational Programme have been carried out. The accompanying Natura Impact Report has demonstrated that the implementation of the Operational Programme has the potential to result in adverse impacts to the integrity of the Natura 2000 network of sites, if unmitigated.

The risks to the safeguarding and integrity of the qualifying interests and conservation objectives of the Natura 2000 network have been addressed by the recommended inclusion of mitigation measures to the document that will prioritise the avoidance of impacts in the first place and mitigate impacts where these cannot be avoided. In addition, all lower level plans and projects arising through the implementation of the Operational Programme will themselves be subject to AA when further details of design and location are known.

Having incorporated these suggested mitigation measures; it is considered that the Operational Programme will not impact on the Natura 2000 network of sites⁹.

⁹ Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:
a) no alternative solution available,
b) imperative reasons of overriding public interest for the plan to proceed; and
c) Adequate compensatory measures in place.