

# APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

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FOR THE

## DUBLIN REGIONAL TOURISM DEVELOPMENT STRATEGY 2023 - 2027

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# Section 1 Introduction and Background

## 1.1 Introduction

This is the Appropriate Assessment (AA) Conclusion Statement for the Dublin Regional Tourism Development Strategy 2023-2027. 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, inter alia, the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. 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 any European site in view of its conservation objectives. This AA Conclusion Statement should be read in conjunction with the Strategy and associated documents including the AA Natura Impact Statement (NIS).

## 1.2 Legislative Requirements in relation to AA

In carrying out the AA for the Strategy, Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), as amended, requires, inter alia, that Fáilte Ireland considers the matters arrayed in the first column on Table 1.1 below. The second column identifies how these issues have been addressed.

**Table 1.1 Matters taken into account by the AA**

Matter specified by the Regulations	How addressed by AA
(a) the Natura Impact Statement	An AA NIS accompanies this AA Conclusion Statement and the Plan
(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	Throughout the AA NIS, particularly Sections 3.4, 4 and 6 and Appendix II of the NIS.
(c) any supplemental information furnished in relation to any such report or statement	This AA Conclusion Statement supplements the NIS that provides additional detail on European Sites.
(d) if appropriate, any additional information sought by the authority and furnished by the applicant in relation to a Natura Impact Report	Submissions made during the Plan preparation/AA process that was relevant to the AA. The AA process has taken into account these submissions – see Section 2 of this Statement.
(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 require that Fáilte Ireland makes available for inspection a determination regarding the outcome of the assessment with respect to whether or not the Strategy would adversely affect the integrity of a European site (a copy of this determination is provided at Section 4).

## 1.3 AA Conclusion Statement

Non-Statutory AA guidance (Department of Environment, Heritage and Local Government, 2009) 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 Conclusion Statement:

- Summary of how the findings of the AA were factored into the Strategy (see Section 2);
- Reasons for choosing the Strategy as adopted, in the light of other reasonable alternatives considered as part of the AA process (see Section 3);
- A declaration that the Strategy as adopted will not have an adverse effect on the integrity of European sites (provided at Section 4); and
- The NIS (the AA NIS is accompanied by this AA Conclusion Statement and has informed the AA Determination – see Section 4).

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

## Section 2 How the findings of the AA were factored into the Strategy

The SEA and AA team worked with the Strategy-preparation team at Fáilte Ireland in order to integrate requirements for ecological protection and environmental management into the Strategy. As a result, various Guiding Principles for Sustainable and Responsible Tourism have been integrated into the Strategy, as detailed in Table 2.1 below – which displays a full list of the mitigation measures incorporated into the Strategy, and the associated appendices of the Strategy itself.

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

In addition to the above guiding principles, 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 compliance<sup>1</sup> with measures relating to sustainable development, ecological protection and environmental management contained within detailed mitigation measures, including the production of Visitor management strategies (where required) or a Construction Environmental management Plan (CEMP) (details in Table 2.1) and further Site Maintenance Guidelines. These are supplied in Appendices 2 through 8 accompanying AA NIS and the Strategy. These appendices outline the process by which this material will be assessed by Fáilte Ireland to ensure that Fáilte Ireland does not promote activities which may be harmful to European sites – or sites which promote access to European sites which are already under threat by visitor movement patterns. Furthermore, the long-term management of European sites is not within Fáilte Ireland's remit.

Furthermore, preventing adverse ecological effects to European sites will be aided through monitoring, which will be bolstered by the requirement to consider the following guidance documents and procedures:

- A2: Site Maintenance Guidelines (appended to AA NIS and to the Strategy);
- A3: Visitor Management Guidelines (appended to AA NIS and to the Strategy);
- A4: Environmental Management for Local Authorities and Others (appended to AA NIS and to the Strategy);
- A5: Environmental Damage Resolution (appended to AA NIS and to the Strategy);
- A6: Greenway Visitor Experience & Interpretation Toolkit (appended to AA NIS and to the Strategy);
- A7: Environmentally Responsible Tourism Promotion & Campaign Statement (appended to AA NIS and to the Strategy); and
- A8: Blueway Management & Development Guide (appended to AA NIS and to the Strategy).

This list will be updated over the life of the Strategy as and when further guidance and procedures may be developed over the lifetime of the Strategy; however, the conclusions of the assessments and the mitigation of effects is not dependent upon the development of such documents. Although several of these documents were prepared initially for the Wild Atlantic Way, they include general mitigation that can be applicable to each Regional Tourism Strategy, for example in areas such as visitor management (Table 2.2) clarifies which parts of each of the below stated appendices apply to the Dublin region).

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

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<sup>1</sup> Demonstration of compliance may be supported by monitoring undertaken by the beneficiary.

**Table 2.1 Mitigation measures for the protection of European Sites**

Environmental component requiring mitigation	Requirement for Local Authorities and Others in order receive funding
<p><b>Natura 2000 network</b></p>	<p><b>Regulatory framework for environmental protection and management</b>                      cumulatively contribute towards – in combination with other users and bodies – the achievement of the objectives of the regulatory framework for environmental protection and management and will ensure that plans, programmes and projects comply with EU Directives – including the Habitats Directive (92/43/EEC), the Birds Directive (2009/147/EC), the Environmental Impact Assessment Directive (2011/92/EU, as amended by 2014/52/EC) and the Strategic Environmental Assessment Directive (2001/42/EC) – and relevant transposing Regulations.</p> <p><b>Protection of Natura 2000 Sites</b>                      No plans or projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) 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 Strategy (either individually or in combination with other plans or projects)<sup>2, 3</sup>.</p> <p><b>Appropriate Assessment</b>                      All projects and plans arising from this Strategy 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 subsequent Appropriate Assessment where necessary, that:</p> <ul style="list-style-type: none"> <li>• The Plan or project will not give rise to adverse direct, indirect or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or</li> <li>• 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 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</li> <li>• 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.</li> </ul> <p><b>NPWS &amp; Integrated Management Plans</b></p>

<sup>2</sup> 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 project to proceed; and c) Adequate compensatory measures in place.

<sup>3</sup> Various other measures, such as "Corridor and Route Selection Process", will contribute towards the protection of European sites. Mitigation measures relevant to the protection of European sites are identified in the AA Natura Impact Statement.

<b>Environmental component requiring mitigation</b>	<b>Requirement for Local Authorities and Others in order receive funding</b>
	<p>Article 6(1) of the Habitats Directive requires that Member States establish the necessary conservation measures for European sites 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 European 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 Strategy 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, including those of local communities.</p>
<b>Natura 2000 network and supporting habitats and species</b>	<p><b>Information to be considered by local authorities and others at lower levels of decision making and environmental assessment</b></p> <p>Lower levels of decision making, and environmental assessment should consider the environmental sensitivities identified in Section 4 of the SEA Environmental Report, including the following (and corresponding Northern Ireland sensitivities, as relevant):</p> <ul style="list-style-type: none"> <li>• Special Areas of Conservation and Special Protection Areas;</li> <li>• Features of the landscape that provide linkages/connectivity to designated sites (e.g., watercourses and areas of semi-natural habitat, such as linear woodlands);</li> <li>• Salmonid Waters;</li> <li>• Shellfish Waters;</li> <li>• Freshwater Pearl Mussel catchments;</li> <li>• Nature Reserves;</li> <li>• Natural Heritage Areas and proposed Natural Heritage Areas;</li> <li>• Areas likely to contain a habitat listed in Annex 1 of the Habitats Directive;</li> <li>• Entries to the Record of Monuments and Places and Zones of Archaeological Potential;</li> <li>• Entries to the Record of Protected Structures;</li> <li>• Un-designated sites of importance to wintering or breeding bird species of conservation concern;</li> <li>• The National Biodiversity Action Plan;</li> <li>• Architectural Conservation Areas; and</li> <li>• Relevant landscape designations.</li> </ul> <p>Where developments, arising from this Strategy, do not require Environmental Impact Assessment, impacts to biodiversity the preparation of a non-statutory Ecological Impact Assessment (EcIA) may be required.</p>
<b>Biodiversity, flora and fauna</b>	<ul style="list-style-type: none"> <li>• Protection of Biodiversity including Natura 2000 Network</li> <li>• Contribute, as appropriate, towards the protection of designated ecological sites including Special Areas of Conservation (SACs) 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 and species; Wildlife sites (including Nature Reserves); 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).</li> </ul>

Environmental component requiring mitigation	Requirement for Local Authorities and Others in order receive funding
	<ul style="list-style-type: none"> <li>• Contribute towards compliance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including the following and any updated/superseding documents):               <ul style="list-style-type: none"> <li>○ EU Directives, including the Habitats Directive (92/43/EEC, as amended), the Birds Directive (2009/147/EC), the Environmental Liability Directive (2004/35/EC), the Environmental Impact Assessment Directive (2011/92/EU, as amended by 2014/52/EC), the Water Framework Directive (2000/60/EC) and the Strategic Environmental Assessment Directive (2001/42/EC).</li> <li>○ National legislation, including the Wildlife Acts 1976 and 2010 (as amended), the Planning and Development Act 2000 (as amended) and associated Regulations, Environmental Impact Assessment Regulations, the European Union (Water Policy) Regulations 2003 (as amended), the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), the European Communities (Environmental Liability) Regulations 2008 (as amended) and the Flora Protection Order 2015.</li> <li>○ 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.</li> <li>○ Catchment and water resource management Plans, including the relevant River Basin Management Plan and Flood Risk Management Plan (including any superseding versions of same).</li> <li>○ Biodiversity Plans and guidelines, including the 3rd National Biodiversity Plan 2017-2023 (including its measures relating to ecological corridors and any superseding version of same) and the All-Ireland Pollinator Plan.</li> <li>○ Freshwater Pearl Mussel Regulations (S.I. 296 of 2009) (including any associated designated areas or management plans).</li> <li>○ Ireland's Environment 2020 - An Assessment (EPA, 2020, including any superseding versions of same), and to make provision where appropriate to address the report's goals and challenges.</li> </ul> </li> </ul> <p>Where developments, arising from this Strategy, do not require Environmental Impact Assessment, a non-statutory Ecological Impact Assessment may be required to assess potential impacts on biodiversity.</p>
<b>Ecological Networks and Connectivity</b>	<ul style="list-style-type: none"> <li>• Contribute towards the 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, natural lighting conditions, 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.</li> </ul>
<b>General ecological features / non-designated biodiversity</b>	<ul style="list-style-type: none"> <li>• Ensure the undertaking of appropriately detailed surveying and assessment at project/EIA/EIAR level and minimisation of loss of biodiversity, including old trees or tree lines or areas of vegetation, as a result of the development of new or widened infrastructure.</li> <li>• Help to ensure the appropriate protection of non-designated habitat features, landscapes and biological diversity. Where possible, to strive to achieve no net loss of these features as a result of new development granted permission under the Plan.</li> <li>• Contribute towards the protection and management of fisheries<sup>4</sup> as appropriate and take into account Inland Fisheries Ireland's "Planning for Watercourses in the Urban Environments" (2020) for developments along watercourses.</li> </ul>

<sup>4</sup> Including with regard to water quality, surface water hydrology, fish spawning and nursery areas, passage of migratory fish, ecosystem structure and functioning and sport and commercial fishing and angling resources.

Environmental component requiring mitigation	Requirement for Local Authorities and Others in order receive funding
<b>Non-native invasive species<sup>5</sup></b>	<ul style="list-style-type: none"> <li>Support, as appropriate, the National Parks and Wildlife Service's efforts to seek to control and manage the spread of non-native invasive species on land and water. Where the presence of non-native invasive species is identified at the site of any proposed development or where the proposed activity has an elevated risk of resulting in the presence of these species, details of how these species will be managed and controlled will be required.</li> </ul>
<b>Habitat or species fragmentation and/or disturbance - due to the development or extension of trails and walkways for the purposes of tourism</b>	<p><b>Corridor and Route Selection Process</b></p> <p>The following Corridor and Route Selection Process will be undertaken for relevant infrastructure:</p> <p>Stage 1 – Route Corridor Identification, Evaluation and Selection</p> <ul style="list-style-type: none"> <li>Environmental constraints (including those identified in Section 4 of the SEA Environmental Report) and opportunities (such as existing linear infrastructure) will assist in the identification of possible route corridor options;</li> <li>Potentially feasible corridors within which infrastructure could be accommodated will be identified and these corridors assessed. The selection of the preferred route corridor will avoid constraints and meet opportunities to the optimum extent, as advised by relevant specialists; and</li> <li>In addition to the constraints identified above, site-specific field data may be required to identify the most appropriate corridors.</li> </ul> <p>Stage 2 – Route Identification, Evaluation and Selection</p> <ul style="list-style-type: none"> <li>Potentially feasible routes within the preferred corridor will be identified and assessed. The selection of preferred routes will avoid constraints and meet opportunities to the optimum extent, as advised by relevant specialists, taking into account project level information and potential mitigation measures that are readily achievable;</li> <li>In addition to the constraints identified above, site-specific field data may be required to identify the most appropriate routes; and</li> <li>In addition to environmental considerations, the identification of route corridors and the refinement of the route lines is likely to be informed by other considerations.</li> <li>European sites may be vulnerable to greenway/cycleway developments due to their location. As outlined in Appendix I to the AA Natura Impact Statement, amenity and leisure activities are already posing an existing level of threat and pressure to various European sites. Some of these sites are in close proximity to a number of already proposed greenways.</li> <li>Screening for AA, and subsequent stages of AA as relevant, will be required for all greenway/cycleway developments when implementing the Strategy.</li> </ul> <p>The feasibility and determination of any route is subject to presenting no significant adverse effect(s) to the integrity of European sites, alone or in combination with other plans or projects, where projects do not meet the strict criteria for imperative reasons of overriding public interest and/or where alternative routes are identified.</p> <p><b>Green Infrastructure and Ecosystem Services</b></p> <ul style="list-style-type: none"> <li>In contributing towards outcomes under the Strategies, partners and stakeholders shall contribute towards the maintenance of existing green infrastructure and its ecosystem services, taking into account the output of the Mapping and Assessment of Ecosystem Services project being undertaken by the NPWS. Proposals for the development of any green infrastructure should demonstrate the synergies that can be achieved with regard to the: provision of open space amenities; sustainable management of water; protection and management of biodiversity; protection of cultural heritage; and protection of protected landscape sensitivities.</li> </ul>

<sup>5</sup> It is noted that the management and prevention of spread of non-native species is not the sole responsibility of the National Parks and Wildlife Service, but also of a variety of public and private bodies that may be involved in this overall objective upon implementation of the Strategy. Invasive species can spread from long distances during the construction of linear routes and consideration of the TII 2020 publication "The Management of Invasive Alien Plant Species on National Roads – Technical Guidance" may be useful in this regard. Any measures intended to manage and prevent the spread of non-native invasive species will have regard to the EU Regulation (1143/2014), i.e., invasive species of Union concern.



Environmental component requiring mitigation	Requirement for Local Authorities and Others in order receive funding
	<ul style="list-style-type: none"> <li>Where possible, extension of existing greenways and future development of new greenways and blueways should complement and integrate rather than replace existing green infrastructure. Stakeholders considering the development of greenways and blueways should have regard to the Fáilte Ireland publication "Greenway - Visitor Experience &amp; Interpretation Toolkit" and, "Connecting with nature for health and wellbeing" EPA Research Report 2020.</li> </ul>
<p><b>Appropriate and tailored site management, which responds to ongoing monitoring results, to reduce direct impacts of tourism (such as trampling, dog walking, littering, disturbance) to sensitive ecological receptors</b></p>	<p><b>Site and Visitor Management</b> Fáilte Ireland's extensive monitoring of the effects of tourism to date has shown predictors of impact occurrence to include: site type; group type; the number of activities; activity intensity; and the interaction between activity intensity and abundance. Site management must consider these factors in seeking to reduce the potential for impacts to occur and to remove impacts.</p> <p><b>Visitor Management</b></p> <ul style="list-style-type: none"> <li>In contributing towards outcomes under the Strategies, partners and stakeholders shall seek to manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant effects including loss of habitat and disturbance, including ensuring that new projects are a suitable distance from ecological sensitivities.</li> <li>Extensive research by Fáilte Ireland has shown improved environmental outcomes (including improved attainment of conservation objectives) in areas with visitor management strategies. Visitor management strategies may be required from partners and stakeholders who are contributing towards outcomes under the Strategies, as relevant and appropriate.</li> <li>Visitor management strategies will be required for proposed plans, programmes and projects that are to receive funding as relevant and appropriate.</li> </ul>
<p><b>Protection of Riparian Zone, Waterbodies, Watercourses and Peatlands</b></p>	<ul style="list-style-type: none"> <li>Help to ensure that waterbodies and watercourses are protected from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. This will include the preservation habitat features/structure, such as treeline density, and protection buffers in riverine, wetland and coastal areas, as appropriate.</li> <li>Support, as appropriate, any relevant recommendations contained in the National Peatlands Strategy 2015.</li> <li>Water Framework Directive and associated legislation.</li> <li>Support the implementation of the relevant recommendations and measures as outlined in the most up to date River Basin Management Plan, and associated Programme of Measures. Proposed plans, programmes and projects shall not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands. Also, to have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.</li> </ul>
<p><b>Coastal Zone Management</b></p>	<p>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><b>Flood Risk Management</b></p>	<p>Comply with the Planning System and Flood Risk Management Guidelines (2009, DEHLG/OPW) (including any clarifying Circulars or superseding versions of same) and relevant outputs of the Catchment and Flood Risk Assessment and Management Studies.</p>

Environmental component requiring mitigation	Requirement for Local Authorities and Others in order receive funding
<b>Water quality<sup>6</sup></b>	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). To 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.
<b>Soil</b>	Ensure that adequate soil protection measures are undertaken where appropriate. Adequate and appropriate investigations shall be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work, where brownfield development is proposed.
<b>Geology</b>	<ul style="list-style-type: none"> <li>• Areas of geological interest and GSI Datasets.</li> <li>• Contribute towards the appropriate protection and maintenance of the character, integrity and conservation value of features or areas of geological interest. Take GSI datasets into account as appropriate, including those relating to geoheritage, groundwater, geohazards, natural resources and coastal vulnerability.</li> </ul>
<b>Climate</b>	<ul style="list-style-type: none"> <li>• Comply with the most up to date Climate Action Plan, National Climate Change Adaptation Framework and National Mitigation Plan, including contributing towards efforts to decarbonise the tourism sector, improve low carbon travel, such as walking and cycling, and the circular economy.</li> <li>• Improve resilience and adaptation to climate change by taking into account issues including the following in the siting and design of projects: <ul style="list-style-type: none"> <li>○ Extreme precipitation and risk of high river flows and associated implications including those relating to pluvial and fluvial flooding, bridge scour, soil erosion and landslides;</li> <li>○ Sea level rise and storm surge and associated implications including those relating to coastal erosion and coastal flooding; and,</li> <li>○ Extreme temperatures and associated implications including those relating to the operation of transport and ancillary infrastructure and services.</li> </ul> </li> </ul>
<b>Built Environment and Infrastructure<sup>7</sup></b>	<ul style="list-style-type: none"> <li>• With respect to infrastructural capacity (including drinking water, wastewater, waste and transport) the potential impact on existing infrastructure as well as the potential environmental effects of a likely increase in tourism-related traffic volumes along any routes resulting from the relevant initiative shall be considered and mitigated as appropriate, where relevant. This consideration and associated mitigation shall take into account the need to provide for climate resilience.</li> <li>• Close collaboration will also be undertaken with the relevant stakeholders, such as Local Authorities and Irish Water, to ensure that any proposed tourism developments align with the capacity of the supporting critical service infrastructure.</li> <li>• Fáilte Ireland will encourage site owners and operators to consider environmentally sustainable solutions and ensure compliance with the Water Framework Directive.</li> <li>• There is a need for close collaboration with Irish Water, to ensure that proposals align with the capacity of the supporting critical water services infrastructure. Local authorities and others shall seek the support of Irish Water, as relevant and appropriate, in its role as the lead authority for water services. Fáilte Ireland will encourage site owners and operators to consider environmentally sustainable solutions and ensure compliance with the Water Framework Directive.</li> </ul>

<sup>6</sup> Also see measures under the headings of Soil; Construction, lighting, noise and air pollution; and, Built Environment and Infrastructure, in this Table for additional measures relating to water quality.

<sup>7</sup> Also see measures under the heading of Soil; Construction, lighting, noise and air pollution in this Table for additional measures relating to Built Environment.

Environmental component requiring mitigation	Requirement for Local Authorities and Others in order receive funding
	<ul style="list-style-type: none"> <li>Ensure that new development is adequately serviced with surface water drainage infrastructure and promote the use of Sustainable Drainage Systems as appropriate.</li> </ul>
<p><b>Construction, lighting, noise and air pollution</b></p>	<p><b>Construction and Environmental Management Plan</b>            Construction Environment Management Plans (CEMPs) shall be prepared in advance of the construction of relevant projects and implemented throughout. Such plans shall incorporate relevant mitigation measures which have been integrated into the Strategy 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"> <li>location of the sites and materials compound(s) including area(s) identified for the storage of construction refuse,</li> <li>location of areas for construction site offices and staff facilities,</li> <li>details of site security fencing and hoardings,</li> <li>details of on-site car parking facilities for site workers during the course of construction,</li> <li>details of the timing and routing of construction traffic to and from the construction site and associated directional signage,</li> <li>measures to obviate queuing of construction traffic on the adjoining road network,</li> <li>measures to prevent the spillage or deposit of clay, rubble or other debris,</li> <li>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,</li> <li>details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels,</li> <li>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,</li> <li>disposal of construction/demolition waste and details of how it is proposed to manage excavated soil,</li> <li>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,</li> <li>details of a water quality monitoring and sampling plan.</li> <li>if peat is encountered - a peat storage, handling and reinstatement management plan.</li> <li>measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed).</li> <li>appointment of an ecological clerk of works at site investigation, preparation and construction phases.</li> <li>details of appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity and ecological functioning.</li> </ol> <p><b>Lighting</b>            Lighting fixtures should provide only the amount of light necessary for personal safety and should be designed so as to avoid creating glare or emitting light above a horizontal plane. Lighting fixtures should have minimum environmental impact, thereby contributing towards the protection of amenity and the protection of light sensitive species such as bats.</p> <p><b>Noise &amp; Air</b></p>

Environmental component requiring mitigation	Requirement for Local Authorities and Others in order receive funding
	Contribute towards: compliance and consistency with air quality legislation; greenhouse gas emission targets; management of noise levels, including taking into account available noise maps and Noise Action Plans in force within the Strategy area (including provisions relating to the preservation of Quiet Areas); and reductions in energy usage.
<b>Waste</b>	<ul style="list-style-type: none"> <li>• 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 any of the relevant Local Authorities Waste Management Plans. Construction Waste Management Plans will be implemented 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.</li> <li>• Support the minimisation of waste creation and promote a practice of reduce, reuse and recycle where possible.</li> <li>• Safeguard the environment by seeking to ensure that residual waste is disposed of appropriately.</li> </ul>

**Table 2.2 Application of Appendices to the Strategy**

<b>Strategy Appendix</b>	<b>Purpose</b>	<b>Section(s) applicable to Dublin Regional Tourism Strategy<sup>8</sup></b>
<b>Appendix 2 Site Management Guidelines</b>	These guidelines contain information aimed at assisting Local Authorities to identify and manage repair works that will enhance visitor experience while designing them in such a way that is respectful of the area, considered and sensitive to the sensitivities of local landscape.	All of Document.
<b>Appendix 3 Visitor Management Guidelines</b>	These guidelines offer a set of strategic considerations that can aid Local Authorities in the initial stages of project planning for tourism in sensitive locations – through to project implementation.	All of Document.
<b>Appendix 4 Environmental Management for Local Authorities and Others</b>	This appendix offers a full list of all provisions that each Local Authority must demonstrate compliance with at the lower levels of decision making in order to revive funding.	All of Document.
<b>Appendix 5 Tourism Related Environmental Damage – Failte Ireland Resolution Procedure</b>	This appendix supplies a procedural a flow chart for Local Authorities to follow in identifying, profiling and actioning tourism related damage to sensitive sites.	All of Document.
<b>Appendix 6 Greenway Visitor Experience &amp; Interpretation Toolkit</b>	This toolkit provides a set of considerations for the approach, branding, the design of greenways across Ireland, such as a best practice code for landowner engagement, a model for sustainability, and advice on engagement, maintenance and monitoring for Local Authorities to apply when considering altering existing or creating new greenway projects within or through sensitive locations.	All of Document.
<b>Appendix 7 Environmentally Responsible Tourism Promotion – Failte Ireland Approach</b>	This appendix supplies a statement from Failte Ireland on their approach for responsible tourism promotion across Ireland within their Marketing Directorate.	All of Document.
<b>Appendix 8 Irish Blueway Development Project Phase 3: Blueway Management and Development Guide</b>	These guidelines provide a set of considerations and strategies, and the avenue for receiving Blueway Accreditation, that Local Authorities can utilise for the approach, development and management of blueways across Ireland.	All of Document.

<sup>8</sup> Note: These guidance documents are intended to compliment the Strategy, and the conclusions of the AA assessment and the mitigation of adverse effects is not dependent upon the development of such documents. However, they do include general mitigation that is be applicable to each RTS, irrespective of differences in landscapes, habitats and sensitivities - for example; in areas such as visitor management, site management and tourism promotion.

## Section 3 Consideration of Alternatives

### 3.1 Description of Alternatives

#### Current Situation (Alternative 1: Business as Usual)

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

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

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

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

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

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

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

The ten-year Vision for such a Strategy would see Dublin ranking in the top 3 of its competitive set (Amsterdam, Belfast, Berlin, Copenhagen, Edinburgh and Prague) with tourists choosing to visit because of its uniqueness as a vibrant city centre nestled between mountains and a UNESCO bay, and because it's a recognised global leader for sustainable business events. Both domestic and international tourists would be staying longer and spending more, enjoying experiences that surprise and delight, from distinct "urban villages" across the city, each with a unique experience to offer, to an easily accessible mountain offering overlooking the city scape, and a bay peppered with characterful coastal villages, built heritage and water adventures. There would be lots to see and do, both day and night, with iconic attractions, best in class experiences, world class food, live music and events, internationally renowned festivals and unrivalled nightlife. Locals would be at the heart of the authentic visitor experience, as they share their stories and their city in an engaging and inherently Dublin way. Visitors would be able to navigate their way seamlessly across the region using ticketless public transport and wayfinding that is accessible in their own language.

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

### **Alternative 2A: A Strategy with Additional Requirements for Environmental Protection and Management**

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

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

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

### **Alternative 2B: A Strategy without Additional Requirements for Environmental Protection and Management**

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

## **3.2 Detailed Consideration of Alternatives**

### **Alternative 1: Business as Usual**

Sustainable development, environmental management and environmental protection under **Alternative 1** is provided through the existing statutory planning and consent framework. These measures would contribute towards positive effects on the protection and management of all environmental components (see Table 7.3 in SEA Environmental Report).

Tourism related development would continue to be planned for and consented through the existing statutory planning and consent framework. Potential adverse effects (see Table 7.3 in SEA Environmental Report) would continue to be mitigated through that process.

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

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

There would be one layer of mitigation under **Alternative 1**; the existing statutory planning and consent framework. Tourism related development would continue to be planned for and consented

through the existing statutory planning and consent framework. Potential adverse effects (see Table 7.3 in SEA Environmental Report) would continue to be mitigated through that process.

### **Alternatives 2A and 2B: Prepare a Strategy**

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

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

Under both **Alternatives 2A** and **2B**, tourism related development would continue to be planned for and consented through the existing statutory planning and consent framework. Potential adverse effects (see Table 7.3 in SEA Environmental Report) would continue to be mitigated through that process.

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

A Strategy would help to promote new experiences – including those relating to land use activities and developments. These would also have the potential to increase adverse effects. Notwithstanding this, there would be one layer of mitigation under **Alternative 2B**, through the existing statutory planning and consent framework. **Alternative 2A** would provide additional requirements for environmental protection and management, including those relating to:

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

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

## **3.3 Selected Alternative for the Strategy**

Taking into account the environmental effects (including those relating to European sites and their sustaining resources) summarised above and the strengths and potential present for tourism across the Dublin Region, Fáilte Ireland have proceeded with Alternative 2A "A Strategy with Additional Requirements for Environmental Protection and Management".

For more detail refer to SEA Environmental Report.



## Section 4 AA Determination

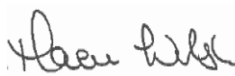
**Appropriate Assessment Determination under the  
European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended)  
for the  
Dublin Regional Tourism Development Strategy 2023-2027**

An Appropriate Assessment (AA) Determination, pursuant to Article 6(3) of the Habitats Directive, as to whether a plan or project would adversely affect the integrity of a European site, and Regulation 42 (11) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), is being made by Fáilte Ireland for the Dublin Regional Tourism Development Strategy 2023-2027.

In carrying out this AA, Fáilte Ireland is taking into account the relevant matters specified under Regulation 42 (12) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended). The AA Natura Impact Statement (which considers other plans and projects) has been carefully considered and its reasoning and conclusion agreed with and adopted. All other documents prepared and submitted during the preparation process for the Dublin Regional Tourism Development Strategy 2023-2027 were also considered in making this determination, including the Strategy to be finalised, and all written submissions made on the Strategy and associated documents while they were on public display.

It is determined that the risks to the safeguarding and integrity of the qualifying interests and conservation objectives of the Natura 2000 network have been addressed by the inclusion of achievable mitigation measures that will prioritise the avoidance of adverse effects in the first place, and reliably mitigate these effects where they cannot be avoided. Furthermore, in order to be realised, projects included in the Strategy will have to comply, as relevant, with the various provisions of legislation, policies, plans and programmes (including requirements for lower-tier AA), that form the statutory decision-making and consent-granting framework, of which the Strategy is not part and does not contribute towards.

Having incorporated these mitigation commitments, it is determined that implementation of the Dublin Regional Tourism Development Strategy 2023-2027 is not foreseen to give rise to any adverse effects on the integrity of any designated European sites, alone or in combination with any other plans or projects<sup>1</sup>. Therefore, no further assessment is required.

Signed:  \_\_\_\_\_  
Signatory  
22<sup>nd</sup> March 2023

<sup>1</sup> Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be:  
a) No alternative solution available,  
b) Imperative reasons of overriding public interest for the plan to proceed; and  
c) Adequate compensatory measures in place.