Prepared by

Roughan & O'Donovan Arena House, Arena Road, Sandyford Dublin 18, D18 V8P6 Tel +353 1 294 0800 | Email info@rod.ie | www.rod.ie











# Strategic Environmental Assessment SEA Statement

## of the Waterford Destination and Experience Development Plan

March 2025

## ACRONYMS

AA	Appropriate Assessment	
AACH	Architectural, Archaeological and Cultural Heritage (AACH)	
ABP	An Bord Pleanála	
AQ	Air Quality	
BFF	Biodiversity Flora and Fauna	
С	Climate	
CAP	Climate Action Plan	
DAFM	Department of the Agriculture, Food & Marine	
DAU	Development Applications Unit	
DECC	Department of Environment, Climate and Communications	
DEDP	Destination and Experience Development Plan	
DHLGH	Department of Housing, Local Government and Heritage [formerly Department of Housing, Planning and Local Government (DHPLG)]	
DTCAGSM	Department of Tourism, Culture, Arts, Gaeltacht, Sport & Media	
EC	European Commission	
EIA	Environmental Impact Assessment	
EPA	Environmental Protection Agency	
EPO	Environmental Protection Objective	
ER	Environmental Report	
EU	European Union	
FI	Fáilte Ireland	
GHG	Greenhouse Gas	
GSI	Geological Survey of Ireland	
L	Landscape	
LA	Local Authority	
L&S	Land and Soils	
МА	Material Assets	
NATURA 2000	Network of SPAs and SACs	
NHA / pNHA	Natural Heritage Area / proposed Natural Heritage Area (designated by EU Habitats Directive)	
NIAH	National Inventory of Architectural Heritage	
NIS	Natura Impact Statement	
NPF	National Planning Framework	
PHH	Population and Human Health	
RMP	Record of Monuments and Places	
ROD	Roughan & O'Donovan	
RPS	Record of Protected Structure	
SAC (cSAC)	Special Area of Conservation (candidate Special Area of Conservation)	
SEO	Strategic Environmental Objective	
SO	Strategic Objectives	

SPA	Creative Distruction Area	
SPA	Special Protection Area	
SEA	Strategic Environmental Assessment	
SEAI	Sustainable Energy Authority of Ireland	
SFRA	Strategic Flood Risk Assessment	
S.I.	Statutory Instrument	
SMR	Sites and Monuments Record	
SRRSESs	Southern Region Regional Spatial and Economic Strategy 2020-2032	
SSFRA	Site-Specific Flood Risk Assessment	
UNESCO	United Nations Educational, Scientific and Cultural Organisation	
W	Water	
WCCC	Waterford City and County Council	
WDEDP	Waterford Destination and Experience Development Plan	
WFD	Water Framework Directive	

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## 1. INTRODUCTION

This Strategic Environmental Assessment (SEA) Statement has been prepared by Roughan & O'Donovan (ROD) on behalf of Fáilte Ireland (FI) as part of the SEA process of the Waterford Destination and Experience Development Plan (WDEDP), referred to hereafter as "the Plan".

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

The purpose of this SEA Statement is to document how the SEA process has influenced the Plan including:

- How environmental considerations have been integrated into the Plan;
- How consultation has influenced the Plan and SEA process;
- The reasons for choosing the Plan in light of the other reasonable alternatives considered; and
- The measures decided upon to monitor the significant environmental effects of the implementation of the Plan.

This SEA Statement should be read in conjunction with the Plan.

#### 1.1 Legislative Context

Under the SEA Directive (2001/42/EC), of the European Parliament and of the Council, on the assessment of the effects of certain plans and programmes on the environment, referred to hereafter as the "SEA Directive", introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including tourism.

Article 9 of the SEA Directive requires a report on how the findings of the SEA and the results of the associated consultation have been integrated into the plan/programme.

The Planning and Development Regulations, 2001, as amended, form the relevant legislation for SEA of tourism plans. Section 13(I) requires that after the making of a plan, the plan or programme making authority is required to make a Statement available to the public and the prescribed environmental authorities.

This SEA Statement must be made available when the plan/programme is formally adopted.

This SEA Statement has been prepared with reference to relevant guidance including, but not limited to:

- Guidance on SEA Statements and Monitoring (EPA, 2023)
- SEA Guidelines for Regional Assemblies and Planning Authorities (2022) Department of Housing, Local Government and Heritage;
- Good practice guidance on SEA for the Tourism Sector (2023) Environmental Protection Agency; and
- Good practice guidance on Strategic Environmental Assessment (SEA) and Landscape (EPA, 2023).

## 2. SUMMMARY OF THE PLAN

The WDEDP is a five-year sustainable tourism plan prepared for Waterford City and County. The Plan represents a multi-stakeholder operational approach focusing on new product and experience development opportunities. It builds on existing tourism projects ensuring a connected destination approach between all tourism related investment activity. This includes projects currently underway, projects featuring in existing plans and new concepts designed to grow tourism across Waterford City and County.

It is a non-statutory tourism plan, it does not provide consent, and/ or establishes a framework for granting consent. The Plan sits within a hierarchy of statutory plans from national, regional to local level but does not influence decision-making of either plans or projects.

The Plan has been informed by and is situated within a hierarchy of higher level public policy plans for land use development, tourism, infrastructure, sustainable development, environmental protection and environmental management. These plans and policies include the National Planning Framework (NPF), Climate Action Plan (CAP), the Southern Region Regional Spatial and Economic Strategy 2020-2032 (SRRSESs), and lower tier Waterford City and County Development Plan 2022-2028 and local area plans in the county.

The target outputs from the Plan are to grow the value of tourism as a key economic sector in Waterford, growing tourism employment, disperse visitors across the destination and increase the length of stay. The key target is to achieve sustained revenue growth and return to 2019 levels of tourism income by 2026. Equally, the development focus within the Plan is to ensure Waterford, as a destination, plays an integral role in growing the regional share of the market. The strategic objectives of the Plan are:

- Motivate the domestic and international consumer to visit Waterford and Ireland's Ancient East.
- Provide the visitor with more reasons to stay, increasing the economic impact of tourism in Waterford.
- Ensure the destination is easy to access, navigate and consume.
- Enable and assist the industry to grow its capacity and capability to ensure that it can thrive and create sustainable jobs in local communities.
- Build committed stakeholder and industry partnerships to guide sustainable destination development.

The Plan provides an opportunity to ensure that all existing and future tourism projects and initiatives within the Plan area are planned, developed and managed in a sustainable and integrated manner. The V.I.C.E. (Visitor, Industry, Community and Environment) Model for Sustainable Tourism is the approach the Plan is developed from and strives to implement.

The Plan concentrates on developing three spatial categories namely: Waterford City, Coastal Communities, and Rural Waterford experiences and how these each integrate with each other to enhance the Waterford Visitor Experience.

Fáilte Ireland recognise the need to integrate environmental considerations into the Plan in a way that responds to the sensitivities and requirements of the wider natural environment. Environmental considerations including inland and coastal water quality

and amenity, climate change, traffic, biodiversity, built and cultural heritage, landscape, critical infrastructure and communities, all play a vital part in a sustainable tourism sector. The protection, enhancement and promotion of the most important tourism asset – the natural environment, has been an integral part of the formation of the Plan which was also supported by this SEA process.

Implementing the Plan will involve Fáilte Ireland, who will facilitate, promote, support and coordinate stakeholders (including local authorities, other government agencies, tourism operators, communities and visitors) in their activities in a way that is consistent with existing and emerging plans.

The implementation of the Plan is based on stakeholder commitment to project delivery over the course of the five-year plan. However, the final delivery of these projects after the timeframe of this Plan will be key contributors to the ten-year vision for Waterford and Ireland's Ancient East. A steering group will be formed to implement the Plan with key stakeholders responsible for project ownership and/ or partnering in the delivery of the agreed actions within the Plan.

## 3. SUMMARY OF SEA PROCESS AND WORK TO DATE

A summary of the key stages of the SEA process with relevance to the development of the Plan is presented in the table below and identifies where we are in the process.

SEA Stage	Role within the SEA Process	Relevance to WDEPD
Screening	Determines whether there would likely be significant environmental effects and if an SEA is required to be undertaken. In accordance with the requirements of the SEA Directive and transposing Regulations S.I. 435/2004 (as amended), Fáilte Ireland undertook an SEA Screening having regard to the criteria in Schedule 1 "Criteria for determining whether a plan is likely to have significant effects on the environment".	Fáilte Ireland undertook an SEA screening in March 2024 and determined that an SEA is required and to proceed directly to Scoping stage.
Scoping & Consultation	The purpose of Scoping is to scope the SEA environmental factors that will be assessed in the SEA Environmental Report (ER). It also provides any opportunity to consult with the relevant environmental authorities to draw an opinion on the scope and level of detail of the environmental information to be included in the ER. The scoping consultation feedback will inform the preparation of the ER and the Draft Plan, as appropriate.	A Scoping Notice/ Letter was issued by Fáilte Ireland on 11 <sup>th</sup> June 2024 for a period of 4 weeks to the statutory consultative bodies.
Environmental Assessment and Preparation of Environmental Report	The purpose of this stage is to identify, describe and evaluate the likely significant effects on the environment as a result of the implementation of the Draft Plan as well as the consideration of alternatives. The ER records this assessment and is published with the Draft Plan for public consultation.	The SEA ER and Non- Technical Summary was prepared through an iterative process involving the SEA, AA and the Plan teams. The ER incorporated feedback from the scoping consultation, which informed both the assessment and the development of the Draft Plan.
Consultation	The Draft Plan and the SEA ER, Non- Technical Summary (NTS) are issued for public consultation for a period of no less than 4 weeks.	The Draft Plan and SEA ER & NTS were published for public consultation on 17 <sup>th</sup> December 2024 to 24 <sup>th</sup> January 2025.
SEA Statement & Monitoring	The purpose of this stage is to identify how environmental considerations and consultation feedback has been taken into account in finalising the Plan. This stage also includes screening any changes for significant environmental effects, if required Finalisation of the monitoring programme is also undertaken. The output of this stage is the SEA Statement.	Current stage in the process. The Plan was finalised by Fáilte Ireland on 12 <sup>th</sup> of March 2025. This SEA Statement is published alongside the finalisation of the Plan.

#### 3.1 Extent to Which Certain Matters are More Appropriately Assessed

There is a recognition as part of the SEA process that certain strategic planning issues have and/ or will be determined at a national level, whereas more detailed/ site-specific issues will be left for consideration at regional and/ or county/ local level as part of the appropriate (plan and/ or project level) decision-making process. The SEA process is concerned with the likely significant and strategic effects that the Plan is likely to have on the environment as a result of its implementation.

When more detailed information is available for the specific plan or project, it will be possible to determine with more precision the likely significant environmental impacts as part of those statutory processes. For example, after the implementation of the Plan:

- At plan level, this could include undertaking the relevant stages of the SEA and AA and/ or SFRA, as required.
- At project level, it will involve any necessary project level assessments for example this could include undertaking Environmental Impact Assessments (EIA), Appropriate Assessment (AA), and/ or site-specific Flood Risk Assessments (SSFRA) or other assessment required as part of the planning or consent process.

# 4. INTEGRATING ENVIRONMENTAL CONSIDERATIONS INTO THE PLAN

This section presents a summary of how the Plan was prepared and the integration of environmental considerations into the preparation of the Plan.

Legislation and guidance relating to SEA recommends that the process of plan preparation, SEA, and Appropriate Assessment (AA) should be integrated and prepared in an iterative process to facilitate ongoing assessment and evaluation of environmental considerations during the preparation of a Plan. In this regard, a multidisciplinary team fed into the preparation of the Plan. The SEA process was also informed by the AA processes.

#### 4.1 Pre-Plan Work Undertaken

The Draft Plan was developed through a programme of stakeholder consultation and research process, reflecting the views of visitors, local tourism industry and the wider community. A programme of international benchmarking was also conducted to assess Waterford City and County against a number of comparable international tourism destinations which has informed the development of the Plan.

Fáilte Ireland undertook a pre-plan consultation which invited pre-draft submissions and observations regarding the development of the Plan.

The stakeholder consultation was developed around the VICE model for sustainable tourism, gathering views and input from the tourism industry, local community and visitors to the area. The consultation process undertaken included:

- Hosting an online workshop providing an opportunity for initial input from communities, tourism industry and local tourism networks.
- Hosting an online survey with input received from tourism businesses, networks and public representatives.
- One-to-one consultation with businesses, community groups, local tourism networks and public representatives.
- One-to-one consultations with senior management and tourism staff from Waterford City and County Council.
- One-to-one interviews undertaken with visitors during their visit to the area.

#### 4.2 SEA Screening

Screening determines whether there it is likely for significant environmental effects on the environment to occur as a result of the implementation of a Plan or programme, and if SEA is required to be undertaken.

In accordance with the requirements of the SEA Directive and transposing Regulations S.I. 435/2004 (as amended), Fáilte Ireland undertook SEA screening and determined that an SEA is required and to proceed directly to Scoping stage.

While the Waterford DEDP is a non-statutory plan and does not form a framework for future development consent the Plan does, fall under the definition of a "plan" contained within the Birds and Natural Habitats Regulations 2011 (as amended) and therefore has been screened for the need to undertake AA. Department Circular Letter SEA 1/08 and NPWS 1/08 require that plans which require an Appropriate Assessment (AA) under Article 6(3) of the Habitats Directive (92/43/EEC) must also undergo SEA.

Taking the above into account and in order to ensure environmental considerations are integrated into the Draft Plan it was determined that SEA was required.

#### 4.3 Scoping Consultation

Under Article 6 of the SEA Directive, the competent authority preparing the Plan, in this case Fáilte Ireland, is required to consult with specific environmental authorities on the scope and level of detail of information to be included in the ER. Under S.I. 436 of 2004 Planning and Development (Strategic Environmental Assessment) Regulations 2004 as amended by S.I. 201 of 2011, the statutory consultees are:

- Environmental Protection Agency (EPA)
- Minister for Housing, Local Government & Heritage (DHLGH) Development Application Units
- Minister for Agriculture, Food and the Marine (DAFM).

Other bodies consulted:

- Department for Environment, Climate and Communications (DECC). Department of Culture, Heritage and the Gaeltacht
- Department of Tourism, Culture, Arts Gaeltacht, Sport & Media (DTCAGSM)

A Scoping Notice was prepared and issued to the environmental authorities and other bodies on the 11<sup>th</sup> of June 2024 for 4-week consultation period. (ending on the to the 9<sup>th</sup> of July 2024). The environmental authorities were invited to provide submissions or observations related to the level of detail and scope that should be included in the SEA Environmental Report (SEA ER).

A total of three responses were received from the environmental authorities consulted, namely:

- Department of Housing, Local Government and Heritage Development Applications Unit (DAU);
- The Department of the Environment, Climate and Communications (DECC) -The Planning Advisory Division and Geological Survey Ireland (GSI) Division and;
- Environmental Protection Agency (EPA).

The submissions received by the environmental authorities were incorporated into the preparation of the Draft Plan and informed the scope and level of detail of the information to be included in the SEA ER. A summary of the submissions received and the responses/ action taken and/ or changes that resulted to the Plan, SEA and AA, is detailed in the Table 4-1 below.

#### Table 4-1Summary of Scoping Submissions and Effect on the Plan and ER

Environmental Authority		Summary of Submission Received	Fáilte Ireland (FI) Response	
Development A	Development Applications Unit (DAU) received on 9 <sup>th</sup> August 2024			
J,	of Ical and -	The DAU have no comments at present.	The project team thank the DAU for their submission. No action was required.	

Environmental Authority	Summary of Submission Received	Fáilte Ireland (FI) Response
Applications Unit (DAU)		
Department of the I 2024	Environment, Climate and Communications (DE	CC) received on 9 <sup>th</sup> July
Department of the Environment, Climate and Communications (DECC) - The Planning Advisory Division	<b>Planning Advisory Division</b> The department asserts the critical importance of using the latest climate and environmental figures for quantitative data and analysis to ensure the Plan appropriately supports the State's climate goals and legally binding targets.	FI acknowledge receipt of and note the contents of DECC's submission and guidance. The ER considers the latest quantitative data and analysis which is contained in Section 5-6 Climate of the ER.
	<ul> <li>A list of national and sectoral policy, plans and strategies are provided for reference while preparing the SEA. These sources could also to be used as baseline data sources for the ER, where applicable. The following documents are listed for these purposes.</li> <li>EPA's report on Ireland's Provisional Greenhouse Gas Emissions 1990-2022</li> <li>SEAI's report on the National Energy Projections 2023 and associated article</li> <li>Ireland's Integrated National Energy and Climate Plan 2021-2030</li> <li>Sectoral Emissions Ceilings</li> <li>The National Adaptation Framework (NAF) 2024</li> <li>Sectoral Adaption Plans made under the NAF</li> <li>The outputs from the National Dialogue on Climate Action (NDCA)</li> <li>EPA's report on Climate Change in the Irish Minds (CCIM)</li> <li>The Clean Air Strategy</li> <li>The Climate Action Plan 2024</li> </ul>	These documents listed have informed the preparation of the relevant baseline sections contained in the ER. Appendix A of the SEA ER contains a review of the plans and programmes which have informed the preparation of this SEA and the Plan.
	The division suggests that the impacts of Plan on the projections of the above reports should be assessed to underpin how the Plan contributes to or works against national climate objectives and policy.	The SEA team have considered climate policy and targets during the assessment of the Plan, as appropriate.
	<ul> <li>The division recommend referring to the following EU Legislation:</li> <li>Directive (EU) 2023/2413;</li> <li>Council Regulation (EU) 2022/2577;</li> <li>the EIA Directive 2014/52/EU; and</li> <li>the Public Participation Directive 2003/35/EC.</li> </ul>	The SEA team have considered the recommended legislation, as appropriate. These are included in Appendix A of the SEA ER.
The Geological Survey of Ireland	GSI Division	The Geological Survey of Ireland's submission is

Environmental Authority	Summary of Submission Received	Fáilte Ireland (FI) Response
(GSI) Division of the Department of the Environment, Climate and Communications (DECC)	GSI encourages the promotion of geological value of popular tourist destinations and offer their assistance with any geological tourism initiatives. The Copper Coast UNESCO Global Geopark which falls within the area covered by this Plan is highlighted by the GSI.	noted. The GSI's capacity for input into geological tourism initiatives is also acknowledged.
	<ul> <li>The division recommends the consultation of publicly available datasets prepared by GSI that are relevant to SEA processes, and provides links to such datasets including:</li> <li>Geological heritage;</li> <li>Culture and tourism;</li> <li>Dimension Stone/Stone Built Ireland;</li> <li>Groundwater;</li> <li>Geological mapping;</li> <li>Geohazards;</li> <li>Historic mines;</li> <li>Marine and coastal unit;</li> <li>National coastal change assessments; and</li> <li>Physiographic units</li> </ul>	The publicly available GSI datasets and maps have informed the preparation of various chapters of the ER baseline, as appropriate.
Environmental Prot	ection Agency received on 31 <sup>st</sup> July 2024	
Environmental Protection Agency	<ul> <li>The EPA notes the Plan should clearly set out the implementation arrangements and governance structures, including relationships between the Plan and existing national, regional and local plans/programmes and authorities.</li> <li>Any synergies between the Plan and key national policies such as the Climate Action Plan 2024, National Planning Frameworks, etc. should be documented, as appropriate.</li> </ul>	The SEA team acknowledges the EPA's submission and guidance. The ER has been prepared in accordance with relevant and most recent planning policy on national, regional and local levels. Appendix A of the SEA ER contains a review of the plans and programmes which have informed the preparation of this SEA. The synergies between these plans and policies and the Plan have been identified and documented in section 4 of the SEA ER.
	The integration of the SEA process into the Plan should be clearly explained. The EPA recommends using summary tables in the ER and the Plan to highlight links between the identified environmental impacts and monitoring/mitigation measures proposed as a result of the SEA process.	The SEA team have included in section 7 of the ER, summary tables linking impacts of the Plan and their respective mitigation and monitoring measures in the ER as appropriate.
	The EPA provided general guidance on the SEA process from scoping to SEA Statement, and	The guidance in the EPA's good practice guidelines has informed the SEA

Environmental Authority	Summary of Submission Received	Fáilte Ireland (FI) Response
	links to online resources relevant to the preparation of the Plan and ER.	team's development of the ER, as appropriate.
	The EPA states that the SEA ER should incorporate and consider as appropriate, the findings of the EPA's State of the Environment Report 2024.	The findings of the EPA's State of the Environment Report 2024 have been incorporated by the SEA team as appropriate in the development of the ER
	EPA notes requirements to contact statutory environmental authorities.	The SEA team confirms that all relevant statutory environmental authorities have been contacted, as per SEA requirements.
	The EPA requests confirmation of receipt of their scoping feedback submission.	The SEA team will send confirmation of receipt of this submission.

#### 4.4 **Preparation of the Environmental Report**

An Environmental Report (ER) is required to include the information that may reasonably be required taking into account:

- Current knowledge and methods of assessment;
- The contents and level of detail in the Draft Plan;
- The stage of the Draft Plan in the decision-making process; and
- The extent to which certain matters are more appropriately assessed at different levels in the decision-making process in order to avoid duplication of environmental assessment.

The preparation of the SEA ER included gathering baseline data, identifying the pressures and threats on environmental receptors, integrating consultation received from environmental authorities during the scoping stage and setting the Strategic Environmental Objectives (SEOs) for which the provisions of the Draft Plan would be assessed.

This ER details the assessment of the likely significant effects of the Draft Plan and proposes mitigation or monitoring as appropriate.

It also included identification and assessment of alternatives to the Plan. The likely significant environmental effects of implementing the Plan were identified and communicated with the plan-making team. The identification of these potential effects informed the plan-making team in the development of provisions as part of the policy-making process.

The SEA team worked with the plan-preparation team at Fáilte Ireland to inform the preparation of the Plan. While significant work was already completed on the Plan before the SEA and AA teams were commissioned, the teams worked together to review the Plan and integrate requirements for environmental protection and management. This iterative process included recommending change to the text in the Plan before it went to public consultation. The projects assessed relate to land use,

infrastructure development, land use activities, capacity building and/ or developing improved communication and co-ordination between attractions.

#### 4.4.1 Strategic Environmental Objectives

The SEOs are methodological measures which have been developed for environmental protection which future environmental effects of the Plan can be measured. The environmental assessment is a qualitative assessment and uses GIS mapping to support the assessment, as appropriate.

In accordance with best practice methodology, the assessment of the likely significant effects on the environment of implementing the Plan was carried out using an accepted and commonly used methodology of creating an assessment matrix. The SEOs detailed in Table 4-2 are used as standards against which the provisions of the Plan and alternatives were evaluated in order to help identify areas in which likely significant positive and/ or adverse impacts are likely to occur on that SEO.

#### Table 4-2 Strategic Environmental Objectives

Environmental Factor	Strategic Environmental Objectives (SEO)
Biodiversity, Flora and Fauna (BFF)	Protect, actively conserve, prevent damage and, where possible, restore biodiversity, particularly European designated sites, other nature conservation sites, protected and threatened habitats and species (including transboundary priority habitats and species), and support ecological corridors (including riparian zones and coastal areas), green and blue infrastructure.
Population and Human Health (PHH)	Protect, support and sustainably manage resources and tourism development, for the benefit of the society and the environment, and contribute towards the economic development of the population supporting positive health outcomes.
Water (W)	Protect, maintain and, where possible, improve water quality including surface water, groundwater, transitional and coastal waters and any wetlands, while preventing deterioration, supporting the achievement of good water quality status of all water bodies as required by the EU and national legislation, and increasing the resilience and adaptation of tourism sites/ activities to the effects of climate change including flood risk and coastal erosion.
Air quality (AQ)	Contribute to the reduction of air pollution and improvement in air quality resulting from the effective operation and management of sustainable tourism activities
Climate (C)	Support and promote the reduction in greenhouse gas emissions from tourism activities and the development of a climate resilient and adaptive tourism sector.
Land and Soils (L&S)	Safeguard existing land and soil resources, protect and improve soil quality, conserve soil, and prevent soil contamination and erosion.
Material Assets (MA)	Sustainably manage, maintain and develop the necessary tourism supporting infrastructure (including water, wastewater, energy supplies, transportation and internet connectivity and associated capacities) and support the development of the circular economy.
Architectural, Archaeological, and Cultural Heritage (AACH)	Avoid, protect and/ or minimise impacts to designated archaeological, architectural, and cultural heritage resources, including their setting and enhance and conserve heritage assets.

Environmental Factor	Strategic Environmental Objectives (SEO)
Landscape (L)	Avoid conflicts with the protection of designated and sensitive features of note in landscapes and sensitively manage landscape change through sustainable planning

#### 4.4.2 Assessing the Draft Plan

The assessment of the likely significant effects on the environment of implementing the Draft Plan was carried out using the SEOs which are used to test the actions and/ or projects proposed in the Draft Plan. The assessment is undertaken using an assessment matrix with a commentary provided under the assessment to aid the reader in understanding the rationale for assigning the rating of potential positive or negative effects. This approach allows the assessment team to explicitly test the likely significant effects against the SEOs to identify which projects support the SEO and which, if any, contradict them. It can also identify uncertain, neutral and/ or not significant effects. Where likely significant effects on the environment are identified as part of the iterative process, additional mitigation measures are recommended in the form of changes to the plan text to be incorporated into the Plan, where necessary. Changes are also recommended to promote or further embedded sustainability into the provisions of the Plan.

Fáilte Ireland and the plan team reviewed these recommendations, proposed edits, and decided whether to incorporate them into the Plan. The changes made to the plan are at this stage is known as embedded mitigation, the Plan text is then reassessed, and the assessment updated accordingly.

This process is detailed in the SEA ER (Section 9) and summarised in Section 6 of this Report illustrating the influence the SEA process had on the Plan.

Prior to finalising the Plan for public consultation, the plan team presented the Draft Plan to senior management and tourism officials at Waterford City and County Council. Fáilte Ireland engaged further with stakeholders to obtain sign-off on projects.

#### 4.5 Integration between the SEA and AA Process

The SEA legislation and associated SEA guidelines indicate that there should be complete integration between the preparation of policy making or in this case the Plan and other environmental assessments that might be required. Figure 4-1 illustrates the key stages in the SEA, AA and the plan development processes highlighting the integration between the processes including key stages of consultation feedback as part of the preparation of the Plan.



Figure 4-1 Integration of the preparation of the Plan with the key stages of the SEA and AA processes.

An AA Screening was undertaken by ROD on behalf of Fáilte Ireland and found that while the Plan is not directly connected with or necessary to the management of a European Site, tourism development and associated activities identified in the Plan have the potential, if unmitigated, to affect the integrity of European Sites in view of their Conservation Objectives, either individually or in combination with other plans or projects.

Therefore, the Plan was subject to a Stage 2 Appropriate Assessment, including the preparation of a Natura Impact Statement (NIS), providing Fáilte Ireland, as the competent authority, with the information upon which it will base its AA. Stage 2 of the AA considers whether the Plan, in-combination with other plans and projects, will adversely affect the integrity of one or more European site, and includes any mitigation measures to avoid or reduce negative impacts on the habitats and/ or species for which the Natura 2000 sites "screened in" for at Stage 1.

In view of best scientific knowledge and in view of the Conservation Objectives of the relevant Natura 2000 sites, the NIS for the Plan has determined that, given the full and proper implementation of the mitigation prescribed therein, that the Plan, either individually or in combination with other plans or projects, will not adversely affect the integrity of any European site.

#### 4.6 Consultation on the Draft Plan, SEA ER and AA

The Draft Plan was placed on public display from 17<sup>th</sup> of December 2024 to 24<sup>th</sup> of January 2025. It was accompanied by the associated environmental assessments including the SEA ER and Non-Technical Summary (NTS) and the Natura Impact

Statement(NIS). The statutory environmental authorities (listed in Section 4 of this report) were notified and the environmental reports issued to them for consultation.

#### 4.6.1 Submissions on the Draft Plan and Environmental Report

There was one submission from one of the statutory environmental authorities namely the EPA. The submission is summarised in the Table 4-3 with a response identifying the resulting changes to the Final Plan, SEA and/or AA as appropriate. There were no other submissions received during the consultation phase.

Table 4-3	Environmental Protection Agency
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Summary of submission - Environmental Protection Agency (EPA)	Response and any change to the Plan that resulted
Key overall comments Given that many of the proposed projects relate to experiencing and exploring the natural and cultural landscapes of the area	Noted.
covered by the Plan, it will be important that these are carefully assessed, developed, monitored and maintained.	No changes to the Plan, SEA or AA.
1. Visitor Numbers We note that central to the Plan is the aim of increasing visitor numbers. This increase has the potential to disturb or damage the natural environment, if not carefully managed. Where the expected increase in tourist numbers materialises, there may be a need for additional or expanded tourism and tourism-related developments. Such developments may have implications for changes to land use, loss of green field sites, disturbance to natural or cultural heritage (including designated sites and protected species, etc.). It is important that tourism offerings are developed at suitable locations and in an environmentally sustainable manner, which minimises potential adverse environmental impacts.	Noted. This is a non-statutory tourism plan, it does not provide consent, and/ or establish a framework for granting consent. All projects are required to comply with all relevant planning and environmental legislation and policy as part of the statutory decision-making process and/ or consent process including the requirement to undertake the required environmental assessments.
	No changes to the Plan, SEA or AA.
2. Critical Infrastructure Provision In the context of increased visitor numbers and any potential development, the Plan should recognise the need for adequate and appropriate wastewater and drinking water services to be put in place to service any infrastructural development associated with Plan-related projects, in the interests of protecting both the environment and public health. In this context, Fáilte Ireland should liaise with Úisce Éireann in terms of future needs for provision of adequate critical services.	Noted. No changes to the Plan, SEA or AA.
<ul> <li>Appendix I - Specific comments on the Draft Plan</li> <li>Biodiversity Considerations</li> <li>The Plan could include a map outlining the environmental sensitivities in the plan area, that should be protected in implementing the Plan and in any developments arising out of the Plan. It is important that the various important ecosystem services and designated sites / protected species within the Plan area are afforded significant protection. The aim should be to ensure that any additional tourism developments are sited, designed, operated and maintained in an appropriate manner. In seeking to enhance tourism developments, the need to maintain and protect the significant environmental resources of the area should also</li> </ul>	The mapping has not been included in the Plan; however, text has been added to Appendix 1 of the Plan, referencing the mapping of key environmental sensitivities that are presented in the SEA ER and NIS.

Summary of submission - Environmental Protection Agency (EPA)	Response and any change to the Plan that resulted
be a clear objective. We welcome that that in Appendix 1 of the Plan, that the environmental considerations associated with the Plan are included. We suggest that a map is included, showing the key elements of environmental sensitivity in the area that the Plan needs to take account of.	
<ul> <li>Appendix II – Comments on the SEA Environmental Report</li> <li>4. We note the commitment to working closely with stakeholders in delivering many of the projects included in the Plan. Those projects should take into account the requirements of the EIA, Birds and Habitats Directives, as appropriate. The potential for cumulative effects that may arise from multiple tourism initiatives needs to be a key consideration also. It will be important that environmental management plans are prepared as appropriate, to ensure that important environmental and cultural resources are afforded significant protection.</li> </ul>	Noted. This is a non-statutory tourism plan, it does not provide consent, and/ or establish a framework for granting consent. All projects are required to comply with all relevant planning and environmental legislation and policy as part of the statutory decision-making process and/ or consent process including the requirement to undertake cumulative assessment.
	No changes to the Plan, SEA or AA.
5. EPA Guidance We welcome the reference to the <i>Good practice guidance on SEA</i> <i>for the tourism sector</i> (EPA, 2023). Our <i>Good practice guidance</i> <i>on SEA and landscape</i> (EPA, 2023) may also be useful to you in finalising the SEA, and in implementing the Plan.	These Guidelines have informed the SEA team's development of the SEA process as appropriate.
6. Environmental Baseline	Noted.
Ireland's <i>Climate Change Assessment</i> (ICCA) has been published in 2024. It provides a comprehensive report on climate change and on the challenges is poses and response options available.	
7. Monitoring The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities. If the monitoring identifies adverse impacts during the implementation of the Plan, Fáilte Ireland should ensure that suitable and effective remedial action is taken.	Noted.
<ul> <li>8. State of the Environment Report – Ireland's Environment 2024</li> <li>In October 2024, the EPA published the latest iteration of our 4-yearly State of the Environment Report. This report should be considered and integrated as appropriate, in implementing the Plan over its lifetime to promote environmental sustainable tourism. It is available at: https://www.epa.ie/ourservices/monitoring-assessment/assessment/state-of-environment-report-/.</li> </ul>	The findings of the EPA's State of the Environment Report 2024 have been incorporated by the SEA team as appropriate in the development of the ER.
Future Amendments to the Plan	Noted.

Summary of submission - Environmental Protection Agency (EPA)	Response and any change to the Plan that resulted
9. You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan.	
SEA Statement – "Information on the Decision"	Noted and addressed in this
10. Once the Plan is adopted, you should prepare an SEA Statement that summarises:	SEA Statement.
<ul> <li>How environmental considerations have been integrated into the Plan;</li> </ul>	
<ul> <li>How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;</li> </ul>	
<ul> <li>The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,</li> </ul>	
<ul> <li>The measures decided upon to monitor the significant environmental effects of implementation of the Plan.</li> </ul>	
<ol> <li>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</li> <li>Guidance on preparing SEA Statements is available on the EPA website at the following link: 06695-EPA-SEA- Statements-and-Monitoring-Report.pdf.</li> </ol>	Noted.
Environmental Authorities	The named environmental
12. Under the SEA Regulations, you should consult with:	authorities have been consulted
<ul> <li>Environmental Protection Agency;</li> </ul>	as part of the SEA process.
<ul> <li>Minister for Housing, Local Government and Heritage;</li> </ul>	
<ul> <li>Minister for Environment, Climate and Communications; and</li> </ul>	
<ul> <li>Minister for Agriculture, Food and the Marine.</li> </ul>	

#### 4.7 SEA Statement

The SEA Statement provides information on the decision-making process and documents how environmental considerations have been taken into account in the Plan. The SEA Statement is required to report on:

- How environmental considerations have been integrated into the Plan highlighting the main changes to the Plan from the SEA process;
- How the ER and consultations have been taken into account summarising the key issues raised in consultations and indicating what action, if any, was taken in response; and
- The reasons for choosing the Plan in light of other reasonable alternatives.

If any material modifications to the Plan are made after the consultation period, these are required to be screened for significant environmental effects by the SEA and AA teams. There was no material changes made to the Plan at Final Plan stage, therefore, SEA and AA screening was not required.

## 5. ASSESSMENT OF ALTERNATIVES

In accordance with Schedule 2 of S.I.435 of 2004 (as amended), the SEA is required to provide: "an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information." This section presents the reasons for choosing the Plan in light of the other reasonable alternatives considered.

#### 5.1 Description of Alternatives

Alternatives are required to be reasonable, realistic and capable of implementation. They must also be set at the appropriate level at which the Plan will be implemented, operating within the planning hierarchy i.e., the higher the level, the more strategic the options are likely to be. Reasonable alternatives were considered by WCCC taking into account the objectives and geographic scope of the Draft Plan.

The alternatives considered by Fáilte Ireland are:

- (1) Alternative 1: Do-nothing Continue without the development of a plan.
- (2) Alternative 2A: Do-something Prepare a plan without environmental consideration.
- (3) Alternative 2B: Do-something Prepare a plan with environmental consideration.

#### 5.1.1 Alternative 1: Do-Nothing

The Do-Nothing nothing option is to continue without the development of a plan. To date, tourism development has developed in Waterford City and coastal/ beach areas as the key destinations in the southeast with some direction and guidance provided under the local authority development plan process. This current direction of development is likely to continue in the absence of a specific destination tourism plan.

Tourism related development would continue with planning and consent obtained through existing statutory planning and consent framework. Potential negative effects would continue to be mitigated through that process.

In the absence of a plan, tourism numbers are expected to increase during peak seasons, concentrated in existing popular locations within the county, including Tramore, Dungarvan and Waterford City.

This alternative continues to support the broad planning and development objectives set in the Waterford City and Council Development Plan however, tourism development would continue in an uncoordinated and ad-hoc basis. The strategic environmental effects resulting from the lack of a tourism plan could impact the Donothing option due to the lack of provision of additional or specialised training and guidance for the development of tourism in Waterford.

#### 5.1.2 Alternative 2A: Do-Something

The Do-something option involves the - prepare a Plan without Environmental Consideration. The preparation of a plan without specific environmental considerations, involves implementing some changes to tourism planning in Waterford. This alternative would result in the development of a tourism plan involving coordination with various stakeholders including local authorities, government agencies, tourism operators, communities and visitors to better manage and plan for tourism in the county.

The Plan would explore and propose solutions to the following development challenges:

- Unequal spread of tourists across County Waterford;
- Unifying Waterford's tourism destinations to create a multi-destination story (i.e., linking City, coastal and rural communities); and
- Support on-going tourism by planning for year-round attractions.

A plan would help to promote new experiences relieving some pressure from existing sites but leading to land use changes as a result of such developments which would not be strategically assessed in advance of being proposed. Notwithstanding this, the existing statutory planning and consent framework would address this issue however, the promotion of tourism experiences without adequately considering the environment in advance of the planning consent process could lead to delays in projects.

Alternative 2A details plans for the development of tourism across the county and towards the objectives of the Plan without specific inclusion of environmental mitigation as part of the plan making process. Alternative 2A would therefore not offer any environmental mitigation strategies outside of consent-granting framework requirements.

#### 5.1.3 Alternative 2B: Do-something

Alternative 2B Do-something involves the preparation of a Plan with environmental considerations. This includes considering environmental mitigation as part of the Plan. Under this option, Fáilte Ireland would require stakeholder compliance with environmental protection, environmental management and sustainable tourism development. Environmental requirements may include assessment of environmental pressures, threats and developing strategies specific to each project. This may entail ensuring projects are developed with appropriate infrastructure, visitor management, development of green infrastructure and ecosystem services.

This alternative has a more robust procedure for plan development and projects will follow to ensure adequate environmental considerations with mitigation where necessary, including those outside of the planning system. These include:

- Embedded mitigation (changes to the plan itself).
- Development of Visitor Management Strategies.

#### 5.2 Alternatives Assessment Methodology

The assessment of the alternatives is undertaken with regard to all of the SEOs detailed in Table 4-2. The assessment identifies and compares the likely significant effects on the environment of implementing each alternative. It identifies which alternative has the greatest potential to have negative impacts and potential positive impacts on the environment, while also achieving the Plan objectives.

The assessment considers that the implementation of each alternative is undertaken alongside the necessary environmental assessments and consent applications for relevant plans and projects, limiting the degree to which impacts can be predicted at this stage The environmental assessment of the alternatives is undertaken for all SEOs.

#### 5.3 Reason for choosing the Plan

When comparing the alternatives, Alternative 1 is likely to have a blend of some positive and negative environmental impacts. However, as there is no plan, it is

assumed tourism growth will continue in the current ad-hoc pattern and expand, primarily in areas of high tourism, increasing pressure in existing tourism sites and pressure on supporting infrastructure in these areas leading to potential for negative impacts on the environment.

The development of a tourism plan presented by Alternates 2A and 2B will result in a more co-ordinated approach to tourism development. Alternative 2A without the additional environmental mitigation and management is likely to deliver on the Plan objectives by promoting tourism development and economic growth, but as it does not explicitly consider environmental protection or management it has the potential to result in more significant negative effects on the environment than the other alternatives and/ or lead to delays in the implementation phase or the delivery of the plan itself at planning stage.

Alternative 2B is likely to deliver a more effective and sustainable tourism development approach in County Waterford, providing both the necessary economic growth and environmental protection. On that basis, Alternative 2B has been selected as the preferred option. Alternative 2B meets the Plan objectives, contains the most environmental mitigation opportunities and is likely to result in more significant positive effects and fewer negative effects than Alternatives 1 and 2A.

Alternative	Description	Environmental Assessment of All SEOs	Environmental Evaluation
Alternative 1: Do-nothing	No plan is developed, tourism development would continue business as usual. Tourism development would follow the WCCC Development Plan.	+/-	This alternative would lead to uncoordinated tourism development across the county. With no plan, the objectives of the plan and the full economic potential for tourism across the county and throughout the year would likely not be realised. Furthermore, the potential environmental effects of this alternative are expected to result in more negative environmental effects than positive.
Alternative 2A: Prepare a plan without Environmental Considerations	Tourism in Waterford City & County will be actioned through the preparation of a plan, without environmental considerations.	+/- ?	Alternative 2A will deliver on many aspects of the Plan objectives, especially those related to expanding regional tourism, creating new experiences and opportunities for visitors and encouraging longer stays. This alternative may also give rise to unexpected environmental effects, uncertainty, positive or negative effects from a lack of consideration to the environmental effects. It is likely there will be more negative effects on the environment than the other alternatives and/ or result in delays to new proposals in areas that may not be suitable or prepared for development without mitigation.

#### Table 6-1Assessment of Alternatives

Alternative	Description	Environmental Assessment of All SEOs	Environmental Evaluation
Alternative 2B: Prepare a plan with Environmental Considerations	Tourism in Waterford City & County will be actioned through the preparation of a plan, with environmental considerations.	+/-	Alternative 2B supports the objectives of the Plan by encouraging the sustainable growth of tourism and economic potential of Waterford. It is anticipated that Alternative 2B will result in more positive than negative environmental effects. This is due to the considerations of environmental effects as part of the preparation of the Plan and opportunity for mitigation and monitoring of any negative effects. Alternative 2B is the preferred option from an environmental perspective and delivery of the Plan objectives.

### 6. CHANGES TO THE PLAN AS A RESULT OF THE SEA PROCESS

The SEA is an iterative process and included suggested amendments and/ or recommended additions to the text of the Draft Plan, resulting in the Plan being updated. After the text in the Draft Plan was updated, the text was reassessed and assessment in the SEA Matrix revised to identify any new or residual effects. In many instances, the assessment of the revised text resulted in the avoidance of potential negative effects and/or strengthened or supported sustainability or likely beneficial effects across the SEOs.

While not all suggested edits and recommendations were included in the Final Plan by the plan team overall it has resulted in integration of environmental protection and sustainability into the Plan. The key changes as a result of the SEA process and how it influenced the final Plan include:

- Changes to text of projects or addition of new projects including environmental protection;
- General changes to the text in the plan to improve legibility of the plan;
- General changes to embed sustainability considerations, and;
- Inclusion of the environmental monitoring programme in the plan to monitor significant environmental effects as part of the next stage in the process.

Some of the key changes to projects in the Plan are summarised in the bullet points below:

- Under the 'Key Destination Catalyst Projects' 'Catalyst Project 1: The development of an 'Attraction of Scale' was proposed at the North Quays of Waterford City. ROD recommended the insertion of the following text as part of this Project "in accordance with the NQ SDZ Planning Scheme and associated SEA, NIS and SFRA" this additional text ensures that any future project is developed in compliance with the relevant SDZ Planning Scheme and associated environmental assessments.
- 2. Under Destination Enabling Projects, specifically for Destination Enabling 2: Waterford Outdoors. ROD recommended separating projects to facilitate a more effective assessment, implementation and monitoring. As a result, the Spur to Helvick project was separated from the Dungarvan to Youghal Link project, additional text was also recommended, as identified in green text, as follows, "Examine the inclusion of a spur to Helvick as part of the link to the Waterford Greenway"
- 3. Under 'Destination Enabling 7: Climate Action / Sustainable Tourism', to address potential transport related carbon emissions resulting from the Plan ROD recommended three new projects under this enabling project. Only one of the projects were incorporated as part of the final plan as identified in green text below. The development of a sustainable tourist transport strategy/plan will facilitate tourists to use sustainable modes of transport where feasible.

Develop a sustainable tourist transport strategy/ plan to aid visitors to plan their trips using sustainable modes of
 transport.

#### 4. Requirements for environmental protection

A summary of the considerations and requirements for environmental protection are listed in the Appendix 1 of the Plan. (These are also replicated in Section 7 of this report as they form part of the key embedded mitigation measures).

#### 5. Environmental Mitigation and monitoring

Inclusion of the SEA Environmental Monitoring Programme is included in Appendix 1 of the Plan. The inclusion of the monitoring programme is in line with best practice and SEA guidance. The environmental monitoring programme will ensure monitoring of significant environmental effects is undertaken as part of the implementation phase of the Plan. The final monitoring programme is replicated in Section 7.5 of this report.

#### 6.1 General Text Amendments to the Plan

ROD provided feedback to the plan team to include general recommendations, these included feedback on formatting, minor text edits some of which were actioned by the plan team. Key amendments included:

- Use of consistent terminology throughout the Plan, for example,
  - Projects are now consistently referred to as "*Destination Enabling Projects*" rather than 'enabler projects or other references
  - *"Strategic Objectives"* are identified in the plan as opposed to key 'objectives or such terms.

The consistent terminology provides clarity to all and assisted the SEA team to assess the Plan. It will also assist in the SEA monitoring as part of the next stage in the process.

#### Appendix 1 Environmental

ROD provided significant input in developing Appendix 1 which summarises the SEA and AA process as part of the plan preparation, including the key findings from the processes, the identification of key mitigation and monitoring measures, and includes the environmental monitoring programme developed and finalised as part of the SEA Statement Stage.

#### Guiding Principles for Sustainable and Responsible Tourism

ROD recommended including the United Nations Sustainable Tourism Principles<sup>1</sup> which are included in the Plan in Appendix 1 detailed below:

- 1. Make optimal use of environmental resources that constitute a key element in tourism development, maintaining essential ecological processes and helping to conserve natural heritage and biodiversity.
- 2. Respect the socio-cultural authenticity of host communities, conserve their built and living cultural heritage and traditional values, and contribute to intercultural understanding and tolerance.
- 3. Ensure viable, long-term economic operations, providing socio-economic benefits to all stakeholders that are fairly distributed, including stable employment and income-earning opportunities and social services to host communities, and contributing to poverty alleviation.

<sup>&</sup>lt;sup>1</sup> <u>Sustainable development</u> (United Nations Tourism)

The SEA process recommended referencing existing sustainable tourism guidance into the Plan so that project promoters can take cognisance of this guidance when developing projects. Some of the key guidance/programmes developed by Fáilte Ireland include :

- Fáilte Ireland Climate Action Programme
- Development Guidelines for Tourism Destination Towns
- Visitor Management Guidelines for the Wild Atlantic Way June 2020
- Wild Atlantic Way Site Maintenance Guidelines
- Tourist Accommodation Quality Assured code of ethics
- Sustainable Festival Guidelines 2023

#### Implementation and Consent

Under the 'Implementation and Consent' section of the Plan. The SEA recommended including a number of key planning and environmental policies with which the Plan (and any projects developed under the Plan) must take cognisance. The text included is summarised below and ensures that all stakeholders are aware of the policy and planning requirements should these be required as part of the implementation phase.

As previously stated, the Plan is a non-statutory tourism plan, it does not provide consent, and/ or establish a framework for granting consent. 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.

The Plan has been informed by and is situated alongside a hierarchy of statutory documents setting out public policy for land use development, tourism, infrastructure, sustainable development, environmental protection and environmental management.

Implementing the Plan will involve Fáilte Ireland working collaboratively to facilitate, promote, support and coordinate stakeholders (including local authorities, other government agencies, tourism operators, communities and visitors) in their activities in a way that is consistent with existing and emerging plans.

In order to be realised, projects included in the Plan will have to comply, as relevant, with the various provisions of legislation, policies, plans and programmes. (including requirements for project level Appropriate Assessment, Environmental Impact Assessment and other licencing requirements as appropriate) that form part of the statutory decision-making and consent-granting framework, of which this Plan is not part and does not contribute towards.

Such legislation, policies, plans and programmes include:

- Compliance with statutory higher-level plans and policies including but not limited to:
  - National Planning Framework (NPF) (and any revisions);
  - Climate Action Plan (CAP) -updated annually
  - Southern Region Regional Spatial and Economic Strategy 2020-2032 (SRRSESs), and
  - Waterford City and County Development Plan 2022-2028 and local area plan in the county.
- Compliance with statutory land use plans that form part of the statutory decision making and consent granting framework and requirement for project level environmental assessment, including EIA, AA & SSFRA, as required.

# Integrating Requirements for Environmental Protection and Management into the Plan

In the Section relating to, 'Integrating Requirements for Environmental Protection and Management into the Plan'. The SEA process recommended including mitigation measures into the Plan relating to sustainably developing the tourism sector and subsequent projects under the plan.

Key considerations for the sustainable development of the tourism sector include:

- Ensuring there is sufficient infrastructure capacity at destination sites;
- Visitor management plans are developed for sites experiencing high demand and future sites; and
- Developers/promoters protect and provide opportunities for the sustainable development of green and blue infrastructure while also delivering ecosystem services.

These elements are further detailed in Section 7 of this report, which addresses the key mitigation measures embedded into the Plan as part of the SEA process.

#### Environmental Monitoring Programme

The Environmental Monitoring Programme (detailed in Section 7.5 of this report) developed under the SEA process has been integrated in to Appendix 1 of the Plan and will be used to monitor environmental effects resulting from the implementation of the Plan.

## 7. MITAGATION AND MONITORING MEASURES

Article 10 of the SEA Directive requires monitoring to be carried out for likely significant environmental effects directly related to the implementation of the Plan *"in order to, inter alia, identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action.*" It is a key part to ensuring the Plan does not negatively impact the receiving environment, and to assess whether current mitigation measures are appropriately compensating any anticipated environmental impacts.

Monitoring of the Plan is focused on monitoring the identified potential significant negative effects on the environment as a result of implementing the Plan.

#### 7.1 Embedded Mitigation

Changes to the plan made during the SEA process are known as embedded mitigation - mitigation that is incorporated into the text of the plan to prevent, reduce, offset and monitor any significant environmental effects. The Plan has benefitted from iterative feedback with stakeholders and the SEA team providing feedback to inform the draft as presented for public consultation. Appendix 1 of the Plan details some of these measures to include:

Having completed the SEA process on the Plan, environmental protection has been integrated into the Plan itself. This was done collaboratively by the SEA and AA team, and the Plan preparation team at Fáilte Ireland. The SEA process helped to identify relevant potential environmental effects and mitigate the effects where possible through alternations to the plan text and inclusion of new projects. This process also highlighted areas of positive environmental effects and built upon those opportunities including through the requirements for projects to develop visitor management plans, project level environmental assessments and sustainable tourism education and training. Other embedded mitigation includes as part of the Plan include:

- Mandatory compliance with all relevant legislation and policy;
- Requirements for environmental assessments at the project/plan level;
- Compliance with the Waterford City and County Development Plan 2022-2028;
- Preparation of Visitor Management Plans;
- Consideration of the critical infrastructure capacity at key tourism sites; and
- Promotion of blue and green infrastructure, and nature-based solutions where appropriate.

#### 7.1.1 Integrating Requirements for Environmental Protection and Management

The Plan includes key considerations for project promoters to consider when developing the projects under the plan, these include compliance with statutory plans and policy and also considerations relating to:

- Infrastructure capacity
- Visitor management; and
- Blue and green infrastructure and integration of ecosystem services.

#### Infrastructure Capacity

With respect to infrastructural capacity (including drinking water, wastewater, waste and transport) the potential environmental impacts associated with increase visitor

numbers and increase pressure on capacities of existing infrastructure (including accommodation) will require careful planning and assessment. The potential environmental effects of the likely increase in tourism volumes resulting from the relevant projects in this plan will need to be considered at project level and mitigated as appropriate. This aspect should be linked to the development of visitor management plans as appropriate. The promotion of developing visitor friendly supporting infrastructure where it is required will also be encouraged.

#### Visitor Management

Partners tasked with progressing actions and projects shall seek to sustainably manage existing and any increase in visitor numbers and/or any change in visitor behaviour to avoid significant effects on the environment including loss of habitat and/or disturbance to sensitive species (including human beings and biodiversity) where relevant. This shall include for example, ensuring that new projects are a suitable distance from ecological sensitivities. Visitor management plans will be required for proposed plans, programmes and projects that are to receive funding as relevant and appropriate.

#### Blue and Green Infrastructure and Ecosystem Services

Those receiving funding shall contribute towards the maintenance and enhancement of existing blue and green infrastructure and its ecosystem services. Proposals for the development of any blue and green infrastructure or activities in these areas 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 protected landscape sensitivities.

#### 7.2 Recommended Additional Mitigation Measures

As a result of undertaking the assessment of the Plan, potential significant negative effects, as a result of implementing the Plan, requiring further mitigation include:

- Reduced availability and affordability of housing accommodation affecting local populations and visitors.
- Increasing international and domestic tourists will likely result in an increase in GHG emissions affecting the ability to meet climate targets.

The existing legislation, plans and policies included in the Development Plan policies and objectives address many of the identified likely and significant environmental effects at project level. It is considered that the Plan and projects stemming from the Plan will need to consider the potential negative effects as a result of the projected increase in tourists and/ or growth of the tourism sector, as appropriate.

The additional recommended mitigation will require a collaborative approach from national to local level at both the policy and project level. The proposed mitigation and monitoring strategies for consideration of Fáilte Ireland are presented below.

#### 7.2.1 Availability of accommodation

As a result of implementing the Plan there is a potential for reduced availability and affordability of housing accommodation affecting local and tourist populations. While the availability of accommodation for tourist and the general public is recognised as a national issue and will be relevant to all tourism plans/strategies it will also need to be addressed at local level as appropriate. The SEA process has identified that additional mitigation is deemed to be required relating to addressing the availability of

accommodation in order for the Plan's objectives to be achieved. The additional measures include:

#### a) Implement and review Fáilte Ireland's Short Term Tourist Letting (STTL) Register for all short term tourist accommodation in Ireland, which will align with the EU regulation for Short Term Rentals.

The national online registration system will require all proprietors who offer Short Term Tourist Lettings to register their property/properties annually. Fáilte Ireland will be able to provide a picture of all short term tourist accommodation providers across the country, with a view to ensuring that adequate housing accommodation for tourists is balanced with the availability for residential accommodation for the general population.

**Responsibility:** Fáilte Ireland, local authority and the Department.

b) Implement and review Waterford City and County Council Housing Delivery Action Plan and Housing for All, as it relates to the tourism industry.

The Housing for All - a new Housing Plan for Ireland states, it is required to implement revised regulatory controls in this area with a view to ensuring the availability of residential accommodation for the general population, balanced with the needs of the tourism sector, as appropriate.

**Responsibility:** Fáilte Ireland, local authority and the Department.

#### 7.2.2 Climate change effects

As an island nation, there will always be a reliance on aviation and ferry travel for attraction foreign visitors. The Plan looks to increase international visitor to travel to Ireland and increasing domestic tourists which are all heavily reliant on fossil fuel travel. This is likely to result increase in GHG emissions and potentially affecting our ability to meet climate targets. The inclusion of the preparation of a sustainable transport strategy (under the Destination Enabling Project 7) will go some way in addressing this potential impact. Furthermore, the provisions under the Climate Action and Low Carbon Development Act 2015, as amended, will ensure that construction and operational related carbon emissions are considered as far as practicable by competent authorities as part of the consent process.

Additional mitigation includes:

- Implement the actions in the Climate Action Plan (CAP) 2024 and the Local Authority CAP and subsequent updates.
- Improve access and availability of sustainable modes of transport and travel;
- Promote business to reduce carbon emissions by getting involved with Fáilte Ireland Climate Action Programme or other similar initiatives;
- Promote visitors to offset carbon emissions.
- Work with partners to implement the relevant actions in the National Adaptation Framework.
- Implement the relevant actions in the Sectoral Adaptation Plan for the Tourism Sector (once developed).

Furthermore, when developing the **Sustainable Tourist Transport Strategy** project, under the Destination Enabling Project 7 of the Plan, the following should be considered:

• Development of an inventory of the key destination sites in the county together with the available transport infrastructure and services to the sites.

• Developing sustainable travel promotional material for each key destination site and work with stakeholders and partners to provide sustainable modes of transport to the site.

#### 7.3 Monitoring Indicators and Targets

As far as practicable, monitoring is based on existing quantitative measures or indicators that can be recorded over time relating to the various SEOs. Each indicator that is monitored has an accompanying target. The SEA Directive indicates that "existing monitoring arrangements may be used if appropriate, with a view to avoiding duplication of monitoring."

While not a statutory document, the Plan has been prepared to compliment and be consistent with other national, regional and local planning and development plans including, but not limited to, the NPF, the RSES, the Waterford City and County Council Development Plan and Ireland's Ancient East Regional Tourism Development Strategy, all of which have been subject to SEA. Consequently, the SEA monitoring measures identified in those plans have been used as a guide in the development of this monitoring programme, with some being the same or have been modified to reflect the needs of this Plan. This consistency across the hierarchy of planning documents will improve the efficiency and effectiveness of future monitoring.

Indicators and monitoring sources for the Plan were also developed with reference to annual reports by Fáilte Ireland, and Waterford City and County Council, such as the Waterford City and County Climate Action Plan. These sources determine the frequency at which continuous monitoring is possible for the Plan.

Table 7-1 identifies the indicators and targets that have been selected for monitoring the likely significant environmental effects of implementing the Plan. The source of data collection and frequency is also identified. Proposed remedial measures are identified to address any potential negative effects. Monitoring is an ongoing process, and the programme allows for flexibility and further refinement of indicators and targets including additional sources of data, as appropriate.

#### 7.3.1 Reporting and Responsibility

The monitoring process will be undertaken by Fáilte Ireland including preparation of evaluation reports and corrective actions, if required. The steering group that will be formed to implement the Plan (that includes key stakeholders responsible for project ownership and/ or partnering in the delivery of the Plan) will be a key source of monitoring data and any remedial measures, as appropriate. The findings of monitoring will be reported periodically with frequencies to be determined during implementation stage.

#### 7.4 Environmental Monitoring Programme

The draft environmental monitoring programme presented at the ER stage was refined further to include minor amendments and sources of data. The environmental monitoring programme that will be used to monitor the likely significant environmental effects of the Plan is detailed in Table 7-1 below.

## Table 7-1 Environmental Monitoring Programme

Environmental Factor and SEO	Indicator	Target	Source and Frequency	Remedial Measures
Biodiversity, Flora and Fauna (BFF) Protect, actively conserve, prevent damage and, where possible, restore biodiversity, particularly European designated sites, other nature conservation sites, protected and threatened habitats and species (including transboundary priority habitats and species), and support ecological corridors (including riparian zones and coastal areas), green and blue infrastructure.	<ul> <li>BFF1: Compliance with the Habitats and Birds Directives with regard to the protection of Natura 2000 sites and Annex I habitats and species and no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function.</li> <li>BFF2: Decline in habitat (quantity or quality) and/ or loss of functional connectivity without remediation resulting from projects arising from the Plan.</li> </ul>	BFF1: Maintenance of favourable conservation status for all habitats and species protected under National and International legislation to be unaffected by implementation of the Plan. BFF2: No habitats or ecological networks, or parts thereof to be impacted/ lost without remediation resulting from projects arising from the Plan.	<ul> <li>Department of Housing, Local Government and Heritage report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every six years)</li> <li>DHLGH National Monitoring Report for the Birds Directive under Article 12 (every three years).</li> <li>Local authority/ An Bord Pleanála planning application project decisions relating to projects under the plan.</li> <li>Data from any relevant Fáilte Ireland monitoring programme relevant to the project/area.</li> <li>Data from beneficiaries provided in funding applications as required under Mitigation Section 9 of the SEA ER. (Frequency: ongoing - project specific).</li> <li>CORINE mapping resurvey (every five years).</li> <li>Local authority (LA) or An Bord Pleanála (ABP) planning application project environmental assessments &amp; decisions.</li> <li>Data from any relevant Fáilte Ireland monitoring programme relevant to the project/area.</li> <li>Visitor management plan relating to project(s).</li> <li>National Biodiversity Data Centre, The Irish Wetland Bird Survey (I-WeBS)</li> </ul>	<ul> <li>Review internal systems or the Plan and make changes as necessary.</li> <li>Where adverse effects are identified undertake investigation as per the Fáilte Ireland Tourism Related Environmental Damage Resolution Procedure and act on recommendations based on the profiling of the environmental damage.</li> <li>Review or update the visitor management plan to address any ecological loss or degradation caused by tourism activities.</li> </ul>
Population and Human Health (PHH) Protect, support and sustainably manage resources and tourism development, for the benefit of the society and the environment, and contribute towards the	PHH1(a): Percentage increase in visitor number to the site/ area over time. PHH1(b): Development and implementation of visitor management plan from projects arising from the Plan.	<b>PHH1:</b> Sustainably manage visitors to the area.	<ul> <li>Data from beneficiaries provided in funding applications as required under Section 9 of the SEA ER. (Frequency: ongoing).</li> <li>Visitor management plan relating to projects.</li> <li>Fáilte Ireland (annual review): Tourism performance reports, visitor surveys, monitoring programmes, tourism research &amp; reports.</li> <li>Central Statistics Office</li> </ul>	<ul> <li>Review internal systems and, if necessary, the Plan.</li> <li>Promote sustainable tourism practices, at the site through the preparation of site-specific campaigns to assist in remedial action, if necessary.</li> </ul>

Environmental Factor and SEO	Indicator	Target	Source and Frequency	Remedial Measures
economic development of the population supporting positive health outcomes.	<b>PHH1(c):</b> Reduction in safety incidences at sites under the Plan.			
	<b>PHH2:</b> Improved accessibility to recreational areas and public health amenities (e.g., parks, coastal areas, greenways, blueways, other trails).	<b>PHH2:</b> Ensure that visitors have appropriate access to recreational areas and public health amenities.	<ul> <li>Data from beneficiaries provided in funding applications as required under Section 9 of the SEA ER. (Frequency: ongoing).</li> <li>Visitor management plan relating to project(s)</li> <li>Local authority/ ABP planning application decisions relating to projects developed under the plan.</li> <li>Local Authority reports (annual review).</li> </ul>	
Water (W) Protect, maintain and, where possible, improve water quality including surface water, groundwater, transitional and coastal waters and any wetlands, while preventing deterioration, supporting	W1: The change in water quality status of surface water, groundwater, transitional, and coastal waters (i.e. Water Framework Directive (WFD) water quality status).	W1: Objectives of WFD are met for all waterbodies in accordance with the latest River Basin Management Plan and Programme of Measures (POM).	<ul> <li>WFD monitoring data on ecological and chemical status of water bodies (RBMP) (every six years).</li> <li>Irish Water (annual review): Drinking water quality reports.</li> <li>Local Authority (annual review): Monitoring of local water bodies.</li> <li>EPA Remedial Action List (regarding drinking water quality).</li> </ul>	<ul> <li>Review internal systems and, if necessary, the Plan.</li> <li>Promote environmentally responsible tourism practices, and have campaigns prepared to assist remedial action, if necessary.</li> </ul>
the achievement of good water quality status of all water bodies as required by the EU and national legislation, and increasing the resilience and adaptation of tourism sites/ activities to the effects of climate change including flood risk and coastal	W2: Overall trend in the mandatory and guide values as set by the EU Bathing Water Directive and transposing Bathing Water Quality Regulations (SI No. 79 of 2008).	W2: No deterioration in the value of bathing waters or adverse effect upon the ability of any bathing water to achieve mandatory values and, where possible, guide values as a result of the Plan.	<ul> <li>EPA through Local Authority (annual review): Monitoring of local water bodies.</li> <li>EPA Water Quality in Ireland report (annual).</li> </ul>	
erosion.	<b>W3:</b> Compliance with regards to Flood Risk Management Guidelines.	<b>W3</b> : Compliance with statutory plans and decision-making process relating to developments in flood risk zones.	<ul> <li>Local authority/ ABP planning application decisions relating to projects developed under the Plan.</li> </ul>	

Environmental Factor and SEO	Indicator	Target	Source and Frequency	Remedial Measures
Air Quality (AQ) Contribute to the reduction of air pollution and improvement in air quality resulting from the effective operation and management of sustainable tourism activities.	<b>AQ:</b> Trends in emissions from ambient air quality monitoring (NO <sub>x</sub> , SO <sub>x</sub> , PM <sub>10</sub> and PM <sub>2.5</sub> ).	<b>AQ:</b> Maintain air quality.	• EPA air quality monitoring.	• Promote environmentally responsible tourism practices, and have campaigns prepared to assist remedial action, if necessary.
Climate (C) Support and promote the reduction in greenhouse gas emissions from tourism activities and the development of a climate resilient and adaptive tourism sector.	C1(a): Demonstrate compliance with provisions relating to climate resilience, mitigation and adaptation have been integrated into the plan/project, as appropriate. C1(b): Evidence that beneficiaries of funding are working to reduce emissions e.g. promoting energy efficiency, water conservation, sustainable travel options to customers through marketing/ promotional material.	C1: Monitor and reduce emissions associated with tourism activities.	<ul> <li>Data from beneficiaries provided in funding applications as required under Section 9 of the SEA ER. (Frequency: ongoing - project specific).</li> <li>EPA - GHG emissions data and projections.</li> <li>Government Climate Action Plan (annual review).</li> <li>Met Eireann (annual statistics).</li> <li>Transport for Ireland - Local Link network statistics.</li> <li>Local authority/ ABP planning application decisions relating to projects developed under the Plan.</li> </ul>	<ul> <li>Review internal systems and, if necessary, the Plan.</li> <li>Promote environmentally responsible tourism practices, and have campaigns prepared to assist remedial action, if necessary.</li> </ul>
	<b>C2:</b> Number of projects participating in Fáilte Ireland Climate Action Programme (FI CAP) or similar under the Plan.	<b>C2:</b> All tourism activities/ promoters to have a link to FI CAP (or similar) to demonstrate climate change resilience and adaptation.	<ul> <li>FI CAP accreditation (annual review).</li> <li>Waterford City and Council Climate Action Plan 2024-2029.</li> <li>FI Sustainable tourism programmes (annual reviews).</li> </ul>	<ul> <li>Review internal systems and, if necessary, the Plan.</li> </ul>
	<b>C3:</b> Improve provision of public transport links in the region and 'last mile'	<b>C3:</b> Reduction in transport emissions	<ul> <li>Fáilte Ireland – Ireland's Ancient East KPI 5. (Data from National Transport Authority &amp; Local Link a strategic part of visitor orientation)</li> </ul>	• Review internal systems and, if necessary, the Plan.

Environmental Factor and SEO	Indicator	Target	Source and Frequency	Remedial Measures
	transport links in partnership with National Transport Authority together with improved e- car charging infrastructure. <sup>2</sup>	emanating from the tourism sector.	<ul> <li>Waterford City and Council Climate Action Plan 2024-2029.</li> <li>National Transport Authority</li> </ul>	• Promote environmentally responsible tourism practices, and have campaigns prepared to assist remedial action, if necessary.
Land and Soils (S) Safeguard existing land and soil resources, protect and improve soil quality, conserve soil, and prevent soil contamination and erosion.	<b>S1:</b> The area of soil that is sealed or artificialised in square km. <sup>3</sup>	<b>S1:</b> Contribute to NPF target to limit the rate of increase of land that is sealed or artificialised and promote the reversal of this in suitable areas e.g., flood zones, high density areas.	<ul> <li>CORINE land cover mapping (CORINE every 6 years (due 2024).</li> <li>Land use national land cover map (Fáilte Éireann - every five years).</li> </ul>	<ul> <li>Review of the site selection process/ assessment of alternatives (if undertaken) where projects occur in greenfield sites in favour of infill/ brownfield sites.</li> </ul>
	S2: Soil erosion/ degradation, landslides without remediation resulting from projects developed under the plan.	<b>S2:</b> No projects contributing to soil erosion, degradation or landslides.	<ul> <li>Data from beneficiaries provided in funding applications as required under Section 9 of the SEA ER. (Frequency: ongoing - project specific).</li> </ul>	<ul> <li>Review internal systems and, if necessary, the Plan.</li> </ul>
Material Assets (M) Sustainably manage, maintain and develop the necessary tourism supporting infrastructure (including water, wastewater, energy supplies, transportation, internet connectivity and associated capacities) and support the development of the circular economy.	M1: Locations where additional tourists are directed by beneficiaries of funding towards areas where critical infrastructure is adequate to sustainably provide for visitors (e.g. water, wastewater capacity, electricity, transport, carparking, etc.) resulting from projects developed under the Plan.	M1: Locations have adequate critical infrastructure available to sustainably provide for tourists.	<ul> <li>Data from beneficiaries provided in funding applications as required under Section 9 of the SEA ER. (Frequency: ongoing - project specific).</li> <li>Local authority/ ABP planning application decisions relating to projects developed under the Plan.</li> <li>Visitor management plan relating to projects.</li> <li>Fáilte Ireland (annual review): Tourism performance reports, visitor surveys, any relevant monitoring programme.</li> </ul>	<ul> <li>Review internal systems and, if necessary, the Plan.</li> <li>Consult with Irish Water or the local authority regarding water and WWtF.</li> <li>Consult with TII local authority or transport providers regarding sustainable transport infrastructure.</li> </ul>

 <sup>&</sup>lt;sup>2</sup> Note: C3 monitoring indicator is taken from (KPI 5 from Ireland's Ancient East RDS 2023-2027).
 <sup>3</sup> Note S1 indicator and target stems from the Revised & updated National Planning Framework SEA ER Monitoring.

Environmental Factor and SEO	Indicator	Target	Source and Frequency	Remedial Measures
	M2: Incidences of significant negative effects on the use of, or access to, public assets and infrastructure from projects developed under the Plan.	M2: No significant negative effects on the use of or access to public assets and infrastructure from projects developed under the plan.	<ul> <li>Fáilte Ireland (annual review): Tourism performance reports, visitor surveys, any relevant monitoring programme.</li> <li>Local authority reports (annual review).</li> </ul>	<ul> <li>Consult utility and energy providers as appropriate.</li> </ul>
Archaeology, Architecture and Cultural Heritage (AACH) Avoid, protect and/ or minimise impacts to designated archaeological, architectural, and cultural heritage resources, including their setting and enhance and conserve heritage assets.	AACH: Changes to Record of Protected Structures (RPS), and Record of Monuments and Places (RMPs) being protected and/ or negatively impacted resulting from projects developed under the Plan.	<b>AACH:</b> No negative or unauthorised effects on any entities listed on the RPS and RMPs from any projects developed under the Plan.	<ul> <li>Local authority/ ABP planning application decisions relating to projects developed under the Plan.</li> <li>Visitor management plan relating to projects.</li> <li>Fáilte Ireland (annual review): Tourism performance reports, visitor surveys, any relevant monitoring programme.</li> <li>Local Authority Development Plans record of protected structures (RPS) (updated every six years).</li> <li>Record of Monuments and Places.</li> </ul>	<ul> <li>Review internal systems and, if necessary, the Plan.</li> <li>Promote environmentally responsible tourism practices, and have campaigns prepared to assist remedial action, if necessary</li> <li>Project promoter to consult with the Conservation Officer or Heritage Officer for Waterford City and County, if required.</li> </ul>
Landscape (L) Avoid conflicts with the protection of designated and sensitive features of note in landscapes and sensitively manage landscape change through sustainable planning.	L: Number of negative landscape or visual impacts resulting from projects developed under the Plan.	L: Avoid negative landscape and visual impacts on the environment, particularly protected landscapes or protected views.	<ul> <li>Visitor management plan relating to projects.</li> <li>Fáilte Ireland (annual review): Tourism performance reports, visitor surveys, any relevant monitoring programme.</li> <li>Local authority/ ABP planning application decisions relating to projects developed under the Plan.</li> </ul>	<ul> <li>Review internal systems and, if necessary, the Plan.</li> <li>Promote environmentally responsible tourism practices, and have campaigns prepared to assist remedial action, if necessary.</li> </ul>