

SEA STATEMENT

STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) BEARA BREIFNE WAY TRAIL PLAN 2023

This Strategic Environmental Assessment (SEA) Statement for the Beara Breifne Way Trail Plan 2023, is prepared by Braniff Associates Planning & Environmental Consultants. It is submitted on behalf of Fáilte Ireland, as the competent authority, which commissioned the preparation of the Trail Plan.

This SEA Statement has been prepared in accordance with Regulation 16 of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, S.I. No. 435/2004. It stipulates that the Statement should outline the following:

- (i) How environmental considerations have been integrated into the Plan;
- (ii) How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- (iii) The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and
- (iv) The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

In general, the purpose of the SEA Statement is to provide written evidence of how environmental considerations yielded by the SEA and consultation process have been taken on board by the Trail Plan. Each of the above considerations listed (i) to (iv) is addressed below.

(i) How environmental considerations have been integrated into the Plan

Environmental considerations have been integrated into the Plan in the following ways:

- At the outset, the formulation of the Trail Plan was assisted by the preparation of an Environmental Sensitivities and Opportunities Report (ESOR). It was prepared concurrently with the Trail Plan by Woodrow APEM Group Ecological Consultants. It sought to advise on the preferred route of the Trail in terms of avoiding impact on highly sensitive environmental locations. Recommendations ranged from avoiding specific habitats and applying appropriate trail surfaces.
- The Trail Plan reinforces the requirement for compliance with environmental legislation and providing guidance for the coherent, sustainable development of the Trail along its entire length. In this regard the Trail Plan complements the

environmental protection and sustainable development objectives embodied within the existing statutory planning and consent framework.

- Importantly, it should be noted that in order to achieve funding (including promotion) from Fáilte Ireland for land use or infrastructural development or activities related to this Trail Plan, stakeholders will be required to demonstrate compliance with legislative requirements relating to sustainable development, environmental protection and environmental management.

(ii) How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan

The Trail Plan has a dedicated section (S 2.7) underlining the necessity to take into account the findings of the SEA, as well as the Appropriate Assessment and ESOR. It also stipulates that the Trail proposals will be subject to the results of detailed environmental surveys.

Three consultations were received from statutory consultees in response to the draft Trail Plan and SEA, namely the Environmental Protection Agency (EPA), Geological Survey Ireland and the Department of Agriculture Environment and Rural Affairs (DAERA) NI. The comments received and the responses to them in respect of the SEA and Trail Plan are tabulated below.

Table 1

Topic	EPA Comments on SEA	Response
Environmental Baseline Consideration	SEA should acknowledge that the capacity of critical infrastructure to absorb increased tourism numbers will be important for the development of the Trail.	This has been incorporated into Section 3.2 of the SEA.
SEA Monitoring	It recommends incorporating SEA-related monitoring into any Plan implementation monitoring/review proposed over the lifetime of the Plan, so that the environmental performance of the Plan can be evaluated.	This has been incorporated into Section 4.1 of the SEA.

Table 2

Topic	DAERA Comments on SEA	Response
Transboundary consultation	There should be a solid commitment within the SEA Environmental Report and the Natura Impact Assessment to consult with the relevant authorities in NI at project level should transboundary effects be identified or are likely.	This has been incorporated into Section 5.112 of the SEA.

Table 3

Topic	Geological Survey Ireland comments on SEA	Response
Geoheritage	It notes that works are proposed in County Geological Sites (CGIs) and highlights the need for mitigation and recording of exposures. Also offers to assist in devising educational signage.	This is duly noted

Table 4

Topic	EPA Comments on Trail Plan	Response
Planning context	Trail Plan does not state that it will be aligned to the National Planning Framework (NPF) or Regional Spatial Economic Strategies (RSES).	Paragraphs have been inserted into Trail Plan (S 2.7) underlining the importance of aligning the Trail Plan with objectives of the NPF and RSES's
Environmentally Sustainable Tourism	Trail Plan needs to incorporate a commitment to regularly monitor visitor numbers	Commitment to such monitoring is included in S2.7.2
Critical Infrastructure Provision	Trail Plan needs to recognise requirement for adequate wastewater treatment, waste and drinking water services.	This is incorporated into the Trail Plan accordingly in a separate section numbered S 2.7.5
Tourism related transport	Trail Plan should acknowledge the need for effective transport planning to take account of impact on air quality and noise levels	Text is inserted in 2.7.5 of the Trail Plan to highlight this.
Built Infrastructure	Particular care should be applied to boardwalk construction, in terms of conserving the ecology and hydrology of bogs. Impact of footbridges and culverts on aquatic life also warrants special attention.	This is inherently acknowledged throughout the Trail Plan
Integration of the environmental assessments into the Plan	Explicit reference should be made to the sensitive environments associated with this Trail and how these will be respected.	Text inserted accordingly in S 2.7
Stakeholder engagement	Trail Plan activities should be carefully considered, in coordination with the relevant national, regional and local stakeholders	This is duly noted
Plan Implementation, monitoring and review	The Plan implementation, monitoring and reporting should be aligned with the environmental monitoring as set out in the SEA Environmental Report.	This is duly noted
Green Procurement Considerations	Include a recommendation in the Plan to promote sustainable and green project level procurement practices for tourism related projects arising out of implementing the Plan.	This is incorporated into the Trail Plan

(iii) The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with

As noted in response to (i) above the ESOR assisted in choosing the route in the adopted Plan. Furthermore, refinements to the route and the type of surface intervention proposed may be subject to change at the local level, once detailed environmental investigations are completed.

Having stated the above it must be acknowledged that there are limitations to the consideration of preferred alternative trail routes from an environmental perspective. These include the necessity to accord weight to the following considerations:

- the historic route of O’Sullivan Beare;
- the observation that 80% of the trail accords with the original route;
- the fact that there are 12 walking sections to this trail that are predominantly waymarked; and
- the extensive nature of the designations and environmentally sensitive areas along the route which ensures that their transection is unavoidable and options to bypass them are limited.

(iv) The measures decided upon to monitor the significant environmental effects of implementation of the Plan

For the most part, monitoring effects on the environment is conducted at the national level by the NPWS (habitats & bird reports), EPA (water quality and river biology testing), Inland Fisheries Ireland (assessment of fish stocks) and the Department of Housing, Local Government and Heritage (archaeology & architectural heritage recording).

At the Council level, monitoring will be particularly required to evaluate the condition of the trail, traffic/parking capacity and litter management.

As noted in the consultation responses SEA-related monitoring will apply both to Plan implementation and any review proposed over the lifetime of the Plan, so that the environmental performance of the Plan can be evaluated.