

# SEA ENVIRONMENTAL REPORT

## APPENDIX III – NON-TECHNICAL SUMMARY

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FOR THE

### DRAFT KILLARNEY DESTINATION EXPERIENCE DEVELOPMENT PLAN

**for:**

**Fáilte Ireland**

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**Fáilte Ireland**  
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## **Section 1 Introduction and Terms of Reference**

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

### **What is an SEA?**

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

### **Why is it needed?**

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

### **How does it work?**

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

The SEA was scoped in consultation with designated environmental authorities.

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

The Environmental Report contains the following information:

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

### **Difficulties Encountered during the SEA process**

No significant difficulties were encountered in undertaking the assessment.

### **What happens at the end of the process?**

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

## Section 2 The Draft Plan

### 2.1 Overview

The Draft Killarney Destination Experience Development Plan (KDEDP) is a five-year plan designed to guide tourism through a roadmap of key projects adopted by all stakeholders in the pursuit of sustained tourism growth and to build on a new collective vision for tourism in Killarney.

The approach of the Plan is based on enhancing the way, in which visitors experience the town while maximising its role as the principal exploration base for the wider Kerry tourism economy. Central to the development theme will be the adoption of a responsible approach to how the town integrates with its natural assets in creating new and motivational town experiences for visitors.

The plan will build upon and extend the existing culture and heritage of Killarney through the creation of cultural quarters. It will create defined linkages between areas of historic and cultural significance while blending Killarney National Park into the core town experience.

The challenge is to deliver enough memorable moments that will inspire visitors to share their experience and also encourage them to return, while providing the tourism industry with a central focus for experience development.

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

The Plan objectives are to:

- Deliver the vision for Killarney in becoming a world class destination strongly differentiated through the integration of its stunning natural environment with a quality urban experience.
- Provide a short, medium to long term focus for post COVID-19 recovery while building resilience in the long term through a new strategic destination development approach.
- Develop a coherent destination brand approach communicating the Killarney visitor experience, building on the essence of the place, its people and status as a base and access point to the Wild Atlantic Way.
- Grow the economic impact of tourism activity through season extension and extending the length of stay in Killarney.
- Leverage the visitor potential of Killarney National Park and the uniqueness of the urban and outdoor experience proposition as a key USP for domestic and international visitors.
- Develop a coherent visitor experience pathway that aligns all members of the tourism industry to deliver great Killarney experiences and ensuring consistency across the destination.
- Maximise the Wild Atlantic Way opportunity for Killarney and the positioning of the town as a key exploration base for the wider Kerry visitor experience.
- Promote tourism vibrancy throughout the town through enhanced visitor flow and orientation throughout the town, its facilities and surrounding amenities.
- Address the challenges of evening economy provision while increasing the range of things to do during the day.
- Maximise the capacity of the town as a leading business tourism/MICE destination.
- Develop the opportunity for the destination through the hosting of leisure and business events.
- Work with the tourism industry to improve their capacity to deliver new and enhanced experiences and product/experience knowledge within the destination.
- Protect, sustain and enhance the natural environment of the Plan area.
- Develop Killarney as a tourism destination that is "accessible for all".
- Contribute to sustainable destination development through the adoption of the VICE model as international best practice proactively embraced by all stakeholders.

Implementing the Plan will involve Fáilte Ireland helping to facilitate, promote, support and coordinate stakeholders (including local authorities, other government agencies, tourism operators, communities and visitors) in their activities in a way that is consistent with existing and emerging plans that have been subject to environmental assessment. The Plan does not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent.

The Plan is situated alongside a hierarchy of statutory documents setting out public policy for, among other things, land use development, tourism, infrastructure, sustainable development, environmental protection and environmental management.

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

In order to achieve funding (including promotion) for land use or infrastructural development or land use activities from Fáilte Ireland, Fáilte Ireland's stakeholders shall be required to demonstrate compliance<sup>1</sup> with measures relating to sustainable development, environmental protection and environmental management contained within the following Fáilte Ireland published documents:

- Wild Atlantic Way Operational Programme Appendix 5 "Site Maintenance Guidelines" and other relevant measures from the Fáilte Ireland visitor and habitat management guidelines series (and any subsequent replacements); and
- Wild Atlantic Way Operational Programme Appendix 6 "Environmental Management for Local Authorities and Others" (and any subsequent replacements).

## 2.2 Relationship with other relevant Plans and Programmes

The Draft Plan sits within a hierarchy of statutory documents setting out public policy for, among other things, land use development, tourism, infrastructure, sustainable development, environmental protection and environmental management. These documents have been subject to their own environmental assessment processes, as relevant, and form the decision-making and consent-granting framework.

The National Planning Framework (NPF) sets out Ireland's planning policy direction up to 2040. The NPF is to be implemented through Regional Spatial and Economic Strategies (RSESs) and lower tier Development Plans and Local Area Plans. The RSES for the Southern Region (that includes the area to which the Killarney DEDP relates) sets out objectives relating tourism development, that have been subject to environmental assessment, including those relating to: enhancing provision of tourism and leisure amenity; promoting tourism activity; developing a road network and public transport services, facilitating improved visitor access and longer dwell times; developing walking and cycling trails, opening greater accessibility to the marine and countryside environment by sustainable modes; and facilitating appropriate tourism development, including that relating to greenways, blueways and peatlands. The RSES provides a framework for the review of existing, assessed lower-tier Development Plans and Local Area Plans, which already include various provisions relating to land use, tourism and infrastructure. Such reviews will also be subject to environmental assessments.

Implementation of the Killarney DEDP shall be consistent with and conform with the NPF, RSES and lower-tier land use plans, including provisions relating to sustainable development, environmental protection and environmental management that have been integrated into these documents including through SEA and AA processes. In order to be realised, projects included in the Killarney DEDP (in a similar way to other projects from any other sector) will have to comply, as relevant, with various legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licencing requirements as appropriate) that form the statutory decision-making and consent-granting framework, of which the Killarney DEDP is not part and does not contribute towards.

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

## Section 3 The Environmental Baseline

### 3.1 Introduction

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

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

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

### 3.3 Biodiversity and Flora and Fauna

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

- **Rare species and habitats** protected in the designated Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) located within the wider Killarney area to which the Plan relates;
- **The Killarney National Park** and its extensive network of native woodlands and blanket bog habitats with many species of rare and protected plants and animals; and
- **Aquatic and riverine ecology** associated with the various streams, rivers and lakes including the Lough Leane, Muckross Lake, Upper Lake and the Rivers Laune, Deenagh and Flesk.

**Land cover** types for the Killarney DEDP area is shown on Figure 3.2.

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

- Special Areas of Conservation<sup>2</sup> (SACs); and
- Special Protection Areas<sup>3</sup> (SPAs).

European sites designated within and adjacent to the area to which the Plan relates (**Sheheree (Ardagh) Bog SAC; Castlemaine Harbour SAC; Killarney National Park, Macgillycuddy's Reeks and Caragh River Catchment SAC; Old Domestic Building Curraglass Wood SAC; Erik Bog SPA; and Killarney National Park SPA**), are mapped on Figure 3.1.

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

#### Existing Fáilte Ireland Environmental Monitoring

Fáilte Ireland regularly engages with environmental research that is used to make informed management decisions and produce robust guidelines to facilitate the protection of the environment. From its inception in 2014, the Wild Atlantic Way (WAW) Operational Programme Monitoring Programme (undertaken to date by CAAS on behalf of Fáilte Ireland guided by relevant stakeholders) has been conducting research into the impacts of tourism on the receiving environment. On site observational surveys and ecological assessments have covered 57 locations and monitored the activities and effects of over 26,000 visitors.

<sup>2</sup> SACs have been selected for protection under the European Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) due to their conservation value for habitats and species of importance in the European Union. The Habitats Directive seeks to establish Natura 2000, a network of protected areas throughout the EU. It is the responsibility of each member state to designate SACs to protect habitats and species, which, together with the SPAs designated under the 1979 Birds Directive, form Natura 2000. The European Communities (Birds and Natural Habitats) Regulations 2011 consolidate the European Communities (Natural Habitats) Regulations 1997 to 2005 and the European Communities (Birds and Natural Habitats)(Control of Recreational Activities) Regulations 2010.

<sup>3</sup> SPAs have been selected for protection under the 1979 European Council Directive on the Conservation of Wild Birds (79/409/EEC) - referred to as the Birds Directive - due to their conservation value for birds of importance in the EU.

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

### 3.4 Population and Human Health

The 2016 Census data identifies the population of the biggest settlement in the area to which the Plan relates, the Killarney Town, as being 14,504 persons<sup>4</sup>.

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

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

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

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

### 3.5 Soil

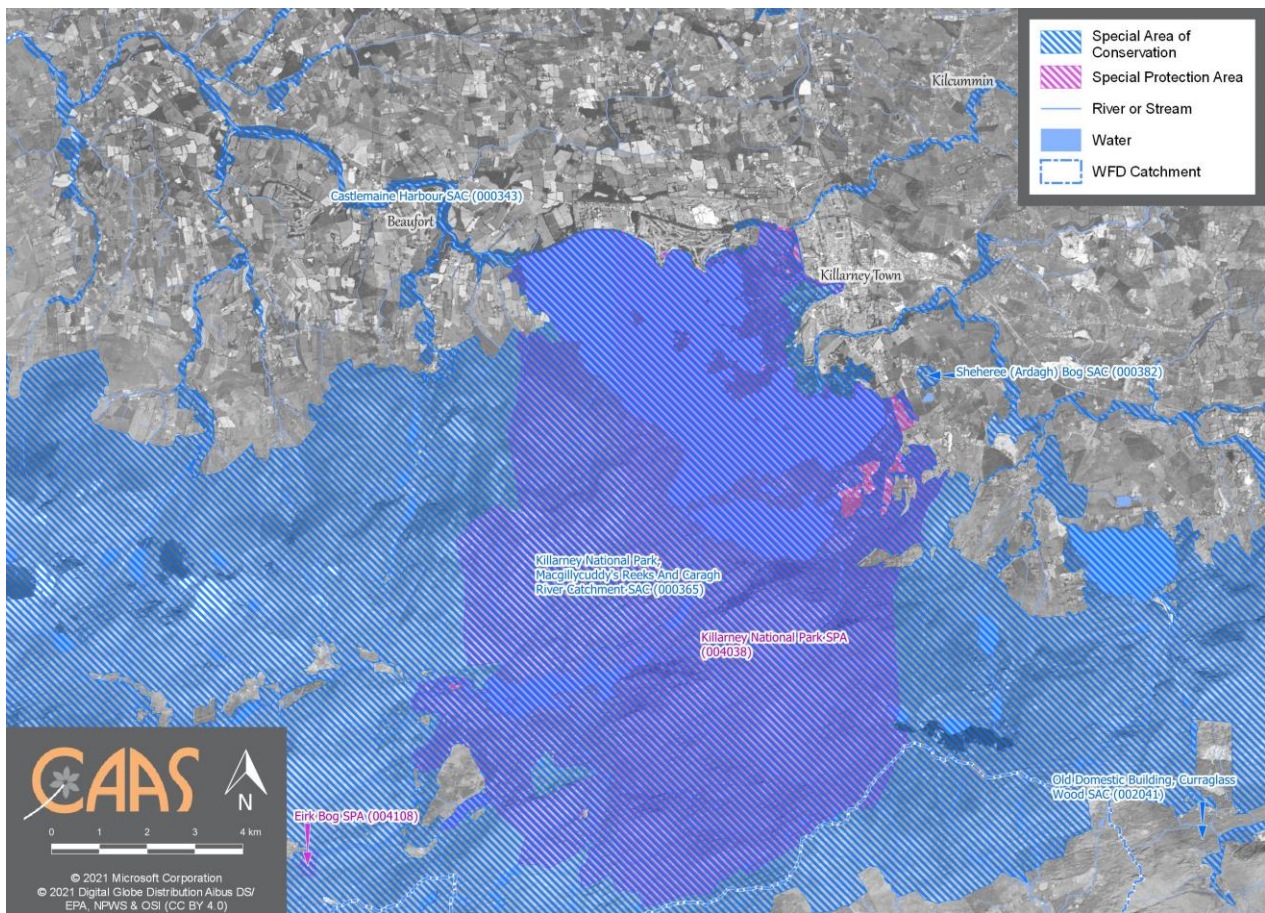
Brown earths, surface water gleys and peat soils make up most of the area to which the Plan relates. The urban areas within the area to which the Plan relates, including Killarney Town are largely made up of man-made soils, surrounded by brown earths and alluvial soils.

Geological Survey of Ireland coordinates the Irish Geological Heritage Programme, which seeks to identify and select sites of geological interest within each county across the country. The audit of County Geological Sites in County Kerry has not yet been completed. There are a number of potential County Geological Sites across the area to which the Plan relates. The highest concentration of these sites occurs in the south, south-east and south-west of the area to which the Plan relates.

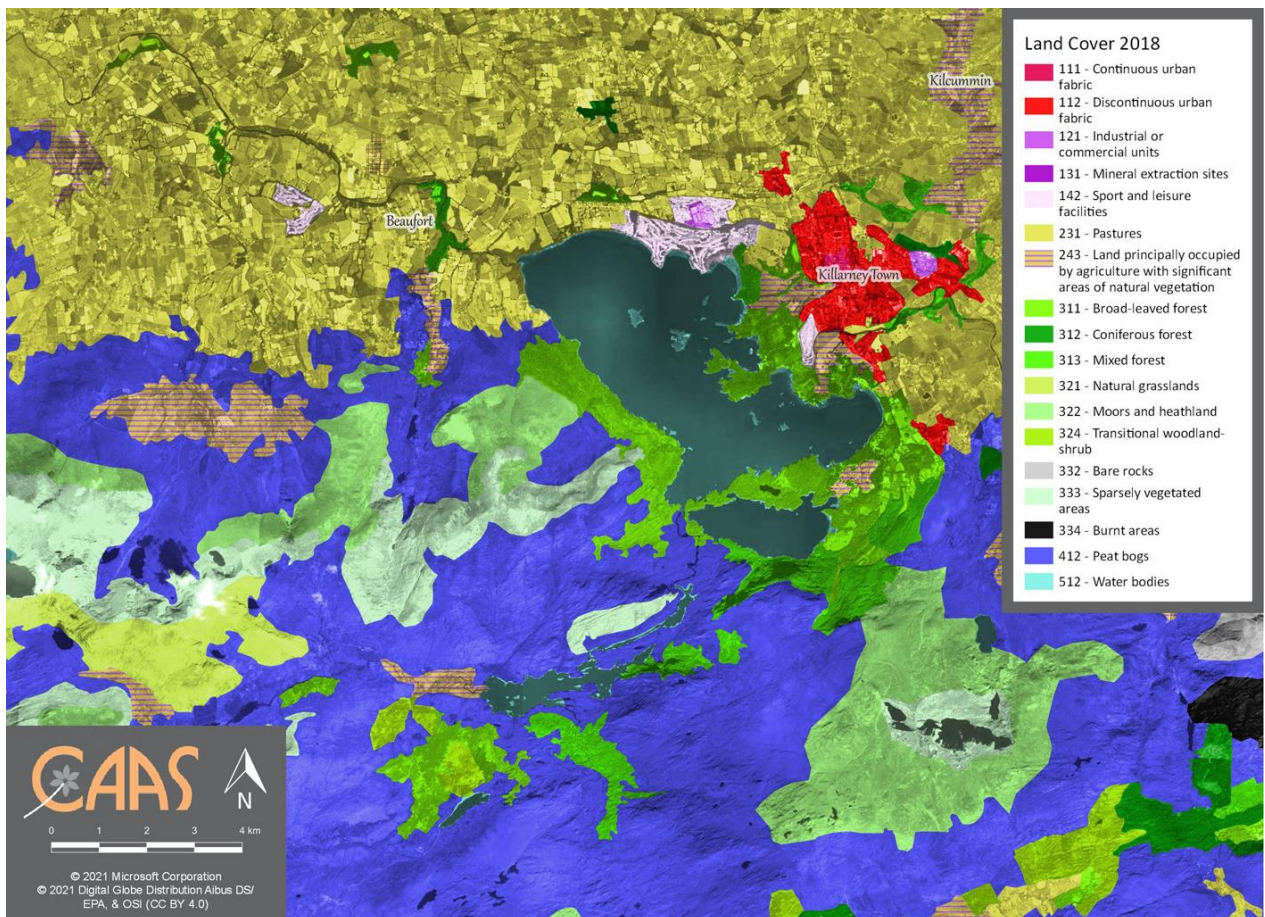
The area to which the Plan relates has several locations with a history of landslide events, associated with the upland, peatland areas. The GSI have identified the area to which the Plan relates as having low levels of landslide susceptibility with some areas of moderately high and high levels of landslide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

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<sup>4</sup> Information on the population for the surrounding areas within the area to which the Plan relates can be accessed from the CSO – Census 2016 Small Area Population Statistics mapping:  
<https://cso.maps.arcgis.com/apps/webappviewer/index.html?id=4d19cf7b1251408c99ccde18859ff739>



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



**Figure 3.2 CORINE Land Cover Mapping 2018**



## 3.6 Water

### Surface and Ground Water Status

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

The WFD surface water status (2013-2018) for rivers and lakes, within and surrounding the area to which the Plan relates is shown on Figure 3.3. The main waterbodies in the area to which the Plan relates include: Lough Leane; Lough Muckcross; Lough Guitane; River Deenagh; and River Flesk.

There are a number of *unassigned*<sup>5</sup> waterbodies within and surrounding the area to which the Plan relates. The WFD status of the surface waters in the area to which the Plan relates is classified as *high*, *good* and *moderate* however, sections<sup>6</sup> of rivers Deenagh, Caragh and Gweestin are identified as being of *poor* due to unsatisfactory ecological/biological and/or physio-chemical status. The status of lakes within the area to which the Plan relates ranges from *high* (including Lough Muckcross) to *good* (including lakes Guitane and Leane) and *moderate* (including Ross Bay and Upper KY).

The WFD groundwater status (2013-2018) of all groundwater underlying the area to which the Plan relates is identified as being of *good* status, meeting the objectives of the WFD.

### Aquifer Vulnerability

Aquifer vulnerability refers to the ease with which pollutants of various kinds can enter into groundwater. The aquifers underlying most the Plan area are generally classified as being of *High*, *Moderate* or *Low vulnerability*. Extreme vulnerability and extreme (rock at or near surface or karst) mainly in the south and south-west of the area to which the Plan relates.

### Flooding

Certain areas across the area to which the Plan relates are at risk from pluvial<sup>7</sup> and fluvial<sup>8</sup> flooding. Historical flooding is documented at a number of locations, including along the River Deenagh and River Flesk in the centre of the area to which the Plan relates.

Predictive flood risk mapping is available from the Office of Public Works (OPW) for rivers and lakes across the area to which the Plan relates<sup>9</sup>. A number of settlements in County Kerry are identified by this mapping as being at elevated risk of flooding, including Killarney Town.

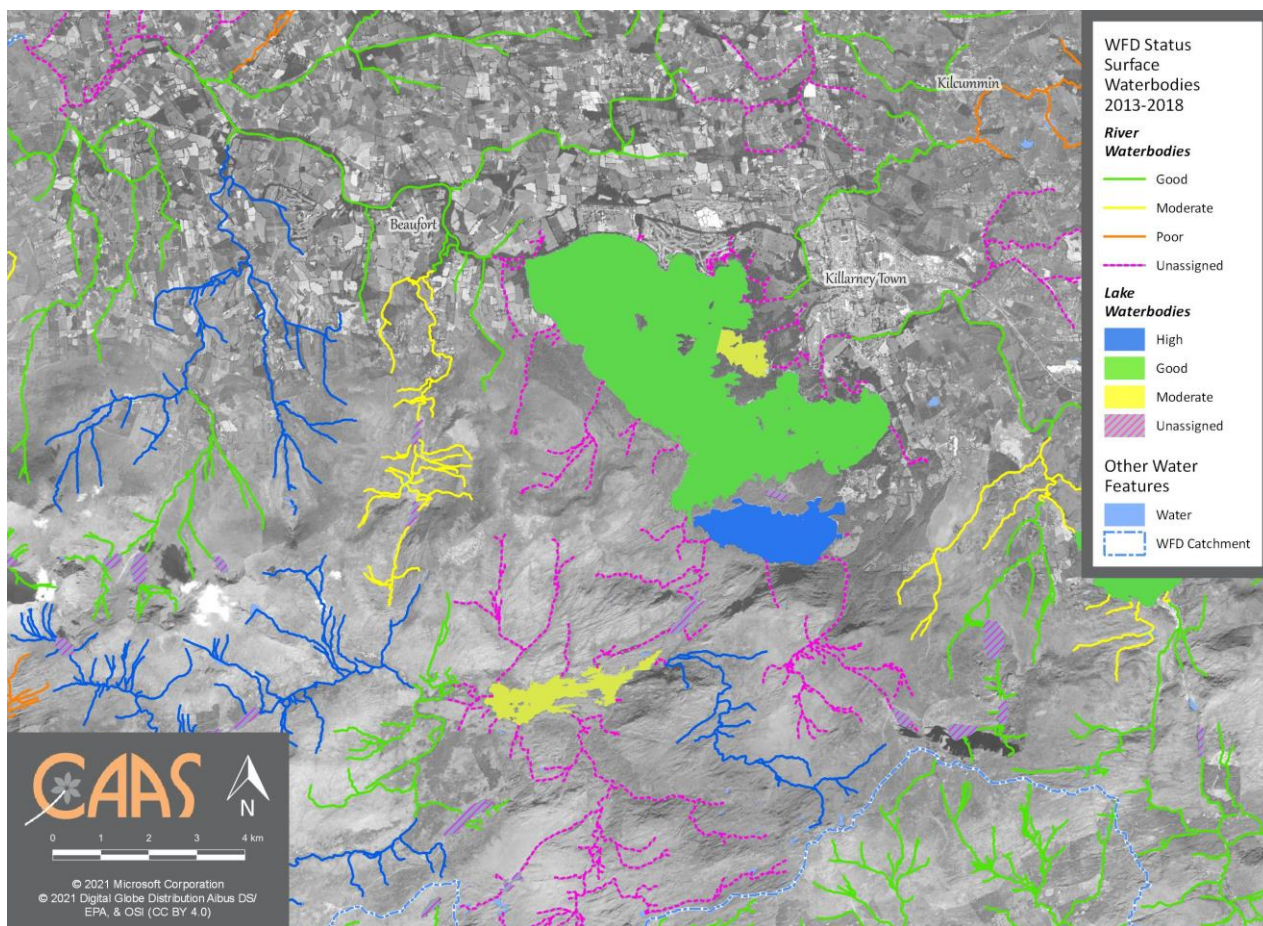
<sup>5</sup> There is a data gap relating to WFD surface water status data. Overall status is currently not assigned and the term "*unassigned status*" applies in respect of these waterbodies.

<sup>6</sup> As per EPA classification system (gis.epa.ie/EPAMaps).

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

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

<sup>9</sup> www.floodinfo.ie



**Figure 3.3 Surface Water Status (2013-2018)**

### 3.7 Air and Climatic Factors

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

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

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

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

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

In order to apply with European Directives relating to air quality, the EPA manages the National Ambient Air Quality Network and measures the levels of a number of atmospheric pollutants at locations across the country. The current<sup>10</sup> air quality in Killarney area is identified by the EPA as being *good*.

<sup>10</sup> 05/11/2021 (<http://www.epa.ie/air/quality/>)  
CAAS for Fáilte Ireland

## 3.8 Material Assets

### Wastewater

The most recent Irish Water compliance report for the Killarney WWTP (Licence No. D0037-01) serving the area to which the Plan relates, shows that facility's operation and environmental performance are satisfactory and in compliance with the discharge licence limit values<sup>11</sup>.

Irish Water, working in partnership with Kerry County Council, are proposing to survey over 20 km of sewers and over 1,000 manholes to undertake essential upgrade works to wastewater treatment plants in towns and villages across County Kerry. These surveys will provide the basis to assess the capacity, condition and performance level of the sewer networks in the county.<sup>12</sup>

### Water Supply

Drinking water supply in the area to which the Plan relates is provided by domestic water wells, private and public water supply schemes, including the Central Regional Lough Guitane PWS.

Under Section 58 of the Environmental Protection Agency Act 1992, the EPA is required to collect and verify monitoring results for all water supplies in Ireland covered by the European Communities (Drinking Water) Regulations, 2000. The EPA publishes their results in annual reports that are supported by Remedial Action Lists (RALs). The RAL identifies water supplies that are not in compliance with the Regulations mentioned above. The Central Regional Lough Guitane PWS is not listed on the most recent EPA Remedial Action List (Q2 of 2021).

### Public Assets and Infrastructure

Killarney Town is the largest settlement in the area to which the Plan relates, designated a "Key Town" by the Regional Spatial and Economic Strategy for the Southern Region. Key Towns are strategically located urban centres with accessibility and significant influence in a sub-regional context. Killarney Town is described as a key national tourism town, having significant sub-regional role, being a part of the Kerry Hub Knowledge Triangle (with Tralee and Killorglin) and on the strategic road network linking with the Atlantic Economic Corridor.

The area to which the Plan relates is served by rail (connectivity to Tralee, Cork, Dublin, and Limerick via Mallow) bus, cycle network, regional and strategic roads and Kerry International Airport, c.18 km from Killarney with flights or services to Dublin, UK and Europe. The area to which the Plan relates provides with access to Wild Atlantic Way, natural environment, Killarney National Park, Ring of Kerry, Ross Castle, Torc Waterfall and other significant cultural, tourism, recreation and sports assets including access to lakes, forests and mountains.

Public assets and infrastructure that have the potential to be impacted upon by the development of tourism related infrastructure, if unmitigated, include resources such as public open spaces, parks and recreational areas; public buildings and services; utility infrastructure (electricity, gas, telecommunications, water supply, wastewater infrastructure etc.). These resources are generally located within the immediate outskirts of urban/suburban areas. Various provisions relating to material assets have been integrated into the Plan, compliance with which will need to be demonstrated by those seeking or maintaining funding from Fáilte Ireland.

### Waste Management

Waste management across the area to which the Plan relates is guided by the Southern Region Waste Management Plan 2015-2021. The Southern Region comprises: Limerick City and County Council; Tipperary County Council; Wexford County Council; Carlow County Council; Kilkenny County Council; Waterford City and County Council; Cork City Council; Cork County Council; Kerry County Council; and Clare County Council. The Plan provides a framework for the prevention and management of waste in a sustainable manner.

<sup>11</sup> Irish Water (2019) *Annual Environmental Reports (AERs)*

<sup>12</sup><https://www.water.ie/projects/local-projects/kerry-sewer-surveys/>

## 3.9 Cultural Heritage

### Archaeological Heritage

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

Various archaeological monuments, including entries to the SMR and RMP, are located within the area to which the Plan relates.

Figure 3.4 shows the spatial distribution of recorded monuments within and surrounding the area to which the Plan relates. The Killarney region, including the area to which the Plan relates, has an important record of prehistoric monuments such as: the stone circle at Lissyviggeen; the copper mine at Ross Island; and many Early Medieval structures. Clusters of archaeological heritage are concentrated around Killarney Town and within other settlements in the area to which the Plan relates. These archaeological monuments include a number of National Monuments in State Care.

### Architectural Heritage

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

Similar to the general spatial spread of archaeological heritage, clusters of architectural heritage are indicated within Killarney Town and other settlement within the area to which the Plan relates, as shown on

Figure 3.4. Examples of Protected Structures within the area to which the Plan relates include: churches; townhouses; squares; castles; and bridges. Notable structures include: St. Mary's Cathedral; Bishop's Palace/St. Mary's Presbytery; Deenagh Lodge; and the Golden Gates.

In addition to Protected Structures, the Planning and Development Act, 2000 provides the legislative basis for the protection of Architectural Conservation Areas (ACAs). The ACA designation requires that planning permission must be obtained before significant works can be carried out to the exterior of a structure in the ACA that might alter the character of the structure or the ACA. There are no ACAs currently designated across the area to which the Plan relates<sup>13</sup>.

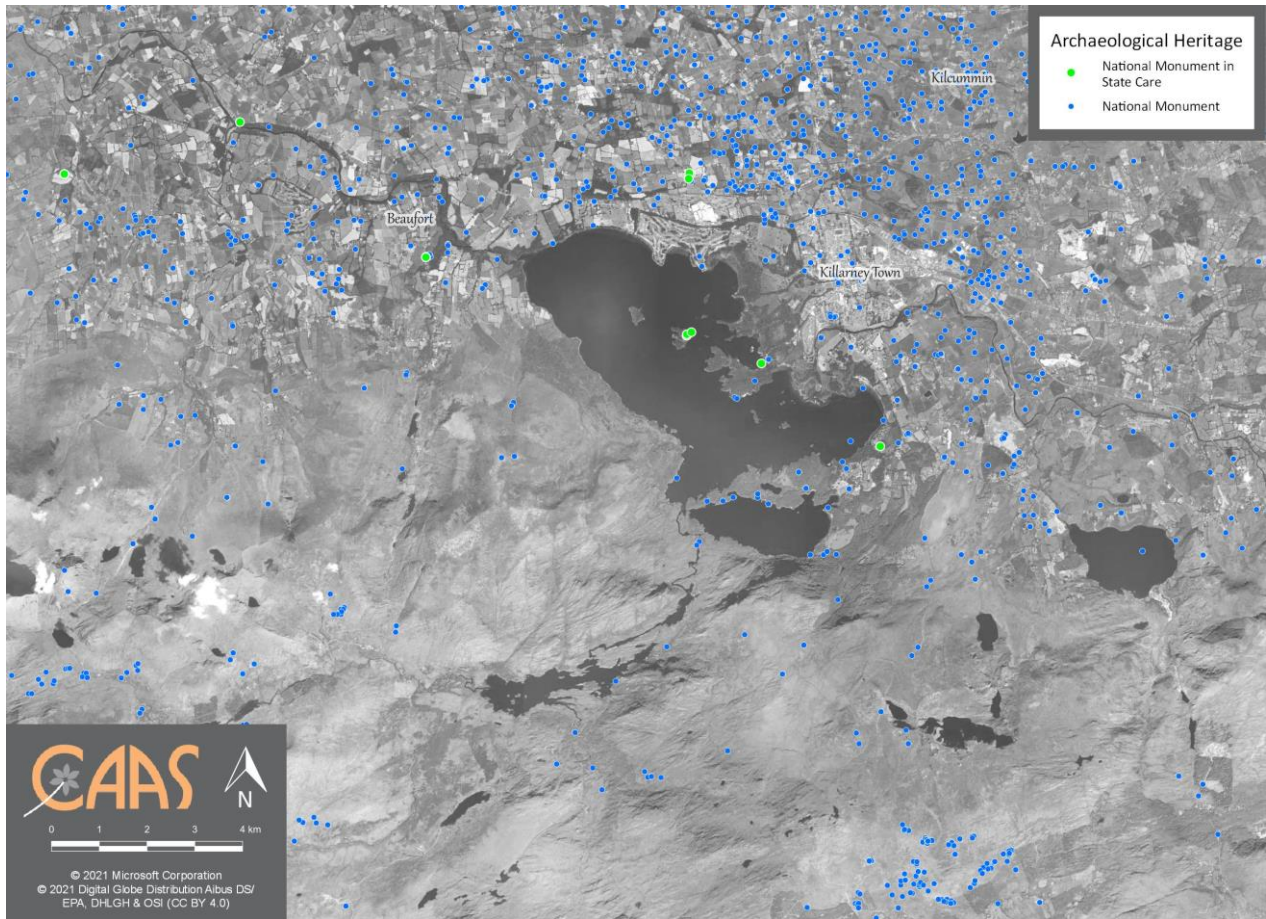
## 3.10 Landscape

The area to which the Plan relates comprises a variety of scenic landscapes situated within the Killarney National Park and Kerry UNESCO Biosphere Reserve with its combination of mountains, lakes and island, waterfalls, boglands, heatlands, extensive woodlands and a historic settlement of the Killarney town. The area encompasses the MacGillycuddys Reeks (Ireland's highest mountain range) and Killarney lakelands with Lough Leane and Lough Muckcross occupying the central parts of the area to which the Plan relates.

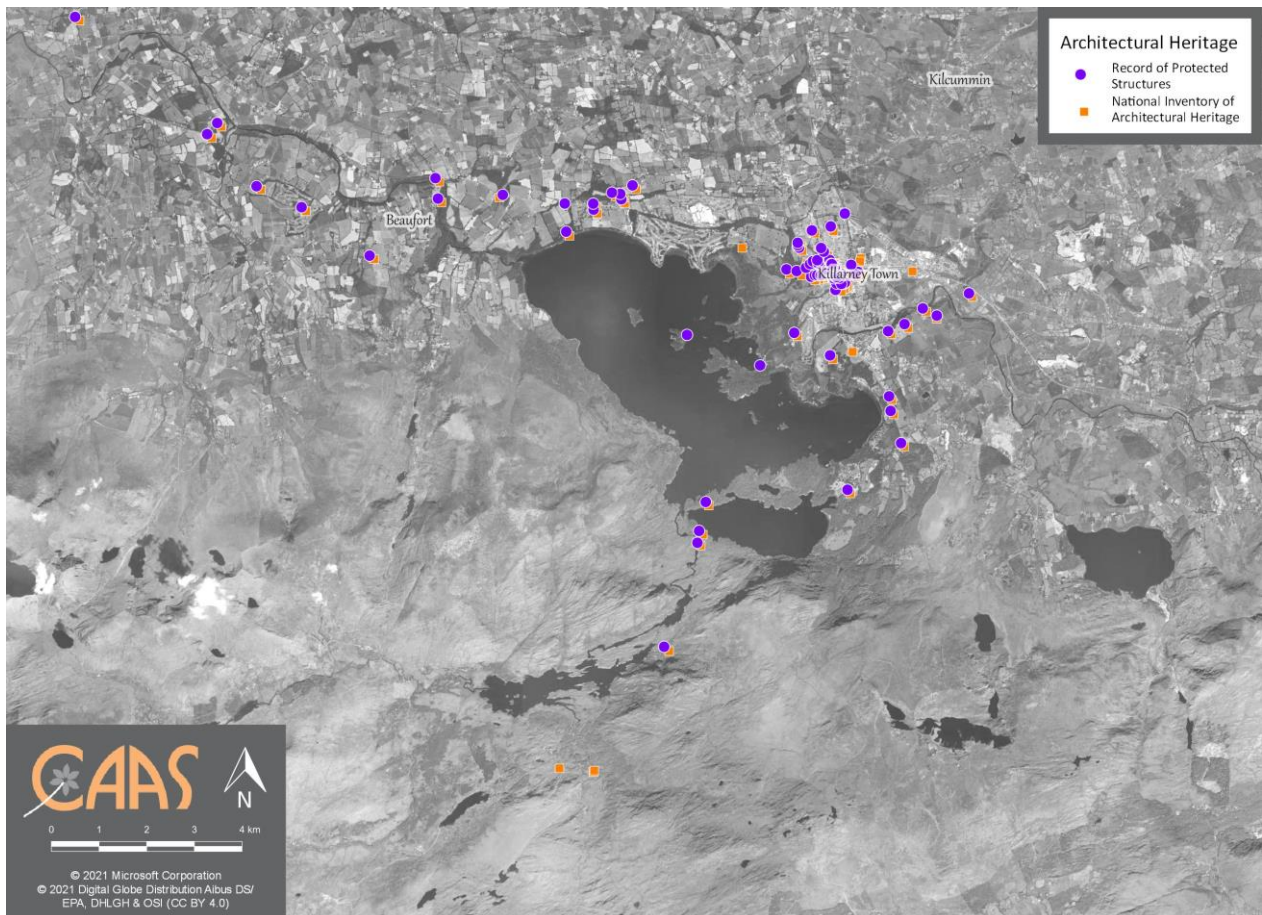
The different landscapes found across the area to which the Plan relates have varying visual and amenity values, topography, exposure levels and contain a variety of habitats. Each landscape type has varying capacity to absorb development related to its overall sensitivity.

The area to which the Plan relates contains many sites, areas and vantage points from which views over areas of great natural beauty, local landmarks, historic landscapes, may be obtained. In addition to scenic views, the County also contains important prospects i.e. prominent landscapes or areas of special amenity value or special interest that are visible from the surrounding area. Other landscape designations relevant to the area to which the Plan relates also include Prime Special Amenity Area and Secondary Special Amenity Area.

<sup>13</sup> Kerry County Development Plan 2015-2021  
CAAS for Fáilte Ireland



**Figure 3.4 Archaeological Heritage**



**Figure 3.5 Architectural Heritage**

### 3.11 Strategic Environmental Objectives

Strategic Environmental Objectives (SEOs) are methodological measures developed from policies that generally govern environmental protection objectives established at international, Community or Member State level e.g. the environmental protection objectives of various European Directives that have been transposed into Irish law and that are required to be implemented. The SEOs are set out under a range of topics and are used as standards against which the provisions of the Draft Plan and the alternatives are evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if - in the case of adverse effects - unmitigated.

**Table 3.1 Strategic Environmental Objectives**

<b>Environmental Component</b>	<b>Code</b>	<b>Strategic Environmental Objectives</b>
<b>Biodiversity, Flora and Fauna</b>	<b>B1</b>	To contribute towards compliance with the Habitats and Birds Directives with regard to the protection of European sites and Annexed habitats and species <sup>14</sup>
	<b>B2</b>	To contribute towards compliance with Article 10 of the Habitats Directive with regard to the management of features of the landscape which - by virtue of their linear and continuous structure or their function act as stepping stones (designated or not) - are of major importance for wild fauna and flora and essential for the migration, dispersal and genetic exchange of wild species
	<b>B3</b>	To contribute towards avoidance of significant impacts on relevant habitats, species, environmental features or other sustaining resources in designated sites including Wildlife Sites <sup>15</sup> and to ensure compliance with the Wildlife Acts 1976-2010 with regard to the protection of species listed on Schedule 5 of the principal Act
<b>Population and Human Health</b>	<b>PHH1</b>	To contribute towards the protection of populations and human health from exposure to incompatible landuses
<b>Soil</b>	<b>S1</b>	To minimise land take and loss to extent of soil resource
<b>Water</b>	<b>W1</b>	To contribute towards the maintenance and improvement, where possible, of the quality and status of surface waters
	<b>W2</b>	To contribute towards maintaining and improving, where possible, the chemical and quantitative status of groundwaters
	<b>W3</b>	To contribute towards compliance with the provisions of the Flood Risk Management Guidelines
<b>Air and Climatic Factors</b>	<b>AC1</b>	To contribute towards climate adaptation and mitigation
<b>Material Assets</b>	<b>M1</b>	For development to be served with adequate and appropriate critical infrastructure with sufficient capacity (drinking water, wastewater, waste and transport) that does not present a danger to human health
	<b>M2</b>	To contribute towards the protection of public assets and infrastructure, including that relating to recreation and leisure, transport, utilities and fisheries
	<b>M3</b>	To reduce waste volumes, minimise waste to landfill and increase recycling and reuse
<b>Cultural Heritage</b>	<b>CH1</b>	To contribute towards the protection of archaeological heritage including entries to the Record of Monuments and Places and/or their context
	<b>CH2</b>	To contribute towards the protection of architectural heritage including entries to the Records of Protected Structures and Architectural Conservation Areas and their context
<b>Landscape</b>	<b>L1</b>	To avoid conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in the Development Plans and other statutory land-use plans

<sup>14</sup> 'Annexed habitats and species' refer to those listed under Annex I, II & IV of the EU Habitats Directive and Annex I of the EU Birds Directive.

<sup>15</sup> The definition of a 'wildlife site' provided by the Planning and Development Act 2000, as amended, includes Natural Heritage Areas (NHAs) and proposed NHAs.

## Section 4 Alternatives

### 4.1 Description of Alternatives

#### Alternative 1: Business as Usual

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

- Historical capital of Irish tourism association and international positioning as must visit destination.
- Uniqueness of urban setting adjacent to a National Park, 'the Town with a National Park' and proximity to stunning natural environment.
- Portfolio of built and natural heritage assets from Muckcross House to Killarney House set in the National Park.
- Quality of tourism industry professionals across all industry segments.
- Quality and diversity of accommodation stock.
- Internationally recognised visitor destination and "must visit" destination.
- Capacity to cater for all levels and volumes of business tourism.
- Reputation as a lively and vibrant evening destination.
- Quality of leisure product mix e.g. outdoor activity and adventure base.
- Accessibility of Killarney to all other major destinations and Wild Atlantic Way as a hub for touring and exploration.
- Quality of relationships with tour operators and level of international programming of Killarney.
- Long established appeal of Killarney to domestic and overseas visitors.
- Ability of Killarney to cater for all visitor segments of all ages and stages.
- Culture of industry collaboration across the destination.
- Quality of festivals and events delivered throughout the year.
- Proximity to international airports.
- Capacity to cater for outdoor activity demand based on experience and expertise.
- Accessibility to iconic outdoor experiences, walks, Killarney Lakes, Carrauntoohil, Torc Waterfalls.
- The embrace of tourism by the community and community pride in its national tourism positioning.

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

- Market perception of the current Killarney brand e.g. perceived as a USA visitor centric destination to possible exclusion of other source markets.
- The need to adapt and address the changing nature of tourism, visitor preferences and the motivations for younger markets i.e. millennials.
- No coherent destination brand adopted by the tourism industry.
- No strong call out of the National Park proposition linked to the town experience and limited integration of the urban and natural environment experience.
- Limited night time economy offering outside of focus on entertainment provided in licenced premises.
- The requirement to address current UK and other European market targeting, with Killarney not currently featuring as a destination option in certain key markets.
- Market perception around Killarney as not being a price competitive destination and offering low value for money.
- Lack of an indoor product of scale that is motivational for visitors across peak and shoulder seasons and supporting the evening economy.
- Limited accessibility to programmed cultural events throughout the season.
- Limited range of retail outlets and lack of diversity among existing retailers.
- Challenge of the market perception that Killarney is always too busy.
- Destination challenge of issues such as seasonality and staffing.
- Lack of a sense of place or definition around the story of Killarney through linking and integration of natural assets, public realm, open spaces.
- Quality of visitor orientation and ability to link town and natural environment experiences.
- Addressing the day time economy to develop business for Killarney between 12pm and 4.00pm.
- Lack of a consistent and cohesive communications approach adopted by the local tourism industry.
- Limited access to unique food experiences in Killarney and high end dining.
- Challenge of traffic management and negative perception associated with traffic issues.
- Accessibility to destination is perceived as challenging through existing regional road infrastructure and rail options directly to the town.
- Position versus Dublin market in developing MICE sector.
- Lack of a gala dining venue for the MICE market.
- Industry training around product and experience knowledge to share with visitors.

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

- Fáilte Ireland Strategic Plan
- People, Place and Policy: Growing Tourism to 2025 Department of Transport, Tourism and Sport
- Kerry Tourism Strategy (2016-2022), Kerry County Council
- Experiencing the Wild Heart of Ireland - A Tourism Interpretative Master Plan for
- Ireland's National Parks (2018), National Parks and Wildlife Service

- Kerry Convention Bureau Roadmap for Growth – 2019-2023
- TEIR One, (2018), Killarney Chamber & Tourism Council

This current situation presents **Alternative 1 (Business as Usual)** to be considered by the SEA. Overtime, numbers of visitors would continue to increase under this scenario – consistent with the development of tourism over many decades.

### **Prepare a Plan (Alternatives 2A and 2B: Prepare a Plan)**

The weaknesses presented by the current situation establish a potential need for a plan that seeks to better manage tourism in the Killarney area; facilitating, promoting, supporting and coordinating stakeholders (including local authorities, other government agencies, tourism operators, communities and visitors) in their activities in a way that is consistent with existing and emerging plans that have been subject to environmental assessment. Such a Plan would not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent (such frameworks fall under the remit of other public authorities). Any projects would continue to be required to comply, as relevant, with the various provisions of documents that form the statutory decision-making and consent-granting framework.

Features of such a Plan (in combination with the wider and extensive policy and wider and extensive policy and planning framework planning framework) would include:

- Addressing issues of **seasonality** and **regionality** while realising increased socio-economic benefits;
- Increase bednights in Killarney by 2% YoY ahead of national average from year 3 of implementation of the Killarney DEDP.
- Increase in visitor numbers in off peak season.
- Increase the value of visitors to Killarney over volume.
- Increased visitor satisfaction.
- Increase Saleable Products (five new or improved saleable experiences) and a tailor made distribution plan for the City.
- Season Extension: Extend opening hours annually by 5% annually.

Under Alternative 2 there are two separate alternatives:

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

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

- Wild Atlantic Way Operational Programme Appendix 5 "Site Maintenance Guidelines" and other relevant measures from the Fáilte Ireland visitor and habitat management guidelines series (and any subsequent replacements); and
- Wild Atlantic Way Operational Programme Appendix 6 "Environmental Management for Local Authorities and Others" (and any subsequent replacements).

In order to be realised, projects included in the Plan (in a similar way to other projects from any other sector) would have to demonstrate compliance, as relevant, with various provisions of legislation, policies, plans and programmes that form the statutory decision-making and consent-granting framework, of which the **Plan is not part and does not contribute towards**.

**Further environmental requirements would be integrated into the Plan under Alternative 2A, relating to infrastructure capacity, visitor management and green infrastructure and ecosystem services.**



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

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

## **4.2 Detailed Consideration of Alternatives**

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

Sustainable development, environmental management and environmental protection under Alternative 1 is provided through the existing statutory planning and consent framework. These measures would contribute towards positive effects on the protection and management of all environmental components.

Tourism related development would continue to be planned for and consented through the existing statutory planning and consent framework. Potential adverse effects would continue to be mitigated through that process.

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

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

There would be one layer of mitigation under Alternative 1, through the existing statutory planning and consent framework.

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

In addition to the measures relating to sustainable development, environmental protection, environmental management which are provided under all alternatives, and measures relating to seasonality and regionality, provided for by this alternative and Alternative 2B, this alternative would provide additional requirements for environmental protection and management, including those taken from the Wild Atlantic Way Operational Programme and those relating to infrastructure capacity, visitor management and green infrastructure and ecosystem services. In order to be realised, projects included in the Plan (in a similar way to other projects from any other sector) would have to demonstrate compliance, as relevant, with various provisions of legislation, policies, plans and programmes that form the statutory decision-making and consent-granting framework, of which the Plan is not part and does not contribute towards.

Tourism related development would continue to be planned for and consented through the existing statutory planning and consent framework. Potential adverse effects would continue to be mitigated through that process.

Although a Plan would help to improve the seasonal and geographic spread of visitors, a Plan's objective would be to increase the number of visitors to the Killarney area. Although this would be likely to happen without a Plan, a Plan would have the potential to increase numbers of tourists – and associated potential adverse effects – to a greater degree than would be the case if there was no Plan. This would be likely to contribute towards an increase in travel related greenhouse gas and

other emissions to air, including from aviation. These increases will be mitigated by provisions that have been integrated into the Plan, including those relating to sustainable mobility and compliance with the Climate Action Plan 2021, the National Climate Change Adaptation Framework (2018 and any subsequent versions).

A Plan would also help to promote new experiences – including those relating to land use activities and developments. These would also have the potential to increase adverse effects. Notwithstanding this, there would be three layers of mitigation, through:

- The existing statutory planning and consent framework;
- Visitor management strategies; and
- Additional environmental requirements for environmental protection and management, under this alternative.

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

In addition to the measures relating to sustainable development, environmental management and environmental protection, which are provided under all alternatives, this Alternative (2B) would provide measures to improve seasonality and regionality. Seasonality and regionality would provide a greater spread of tourists throughout the year and across the Killarney area thereby reducing potential environmental effects and peak load additions on various infrastructure in particular locations/at particular times.

Tourism related development would continue to be planned for and consented through the existing statutory planning and consent framework. Potential adverse effects would continue be mitigated through that process.

Although a Plan would help to improve the seasonal and geographic spread of visitors, a Plan’s objective would be to increase the number of visitors to the Killarney area. Although this would be likely to happen without a Plan, a Plan would have the potential to increase numbers of tourists – and associated potential adverse effects – to a greater degree than would be the case if there was no Plan.

This would be likely to contribute towards in an increase in travel related greenhouse gas and other emissions to air, including from aviation. These increases would be mitigated by the wider planning framework.

A Plan would also help to promote new experiences – including those relating to land use activities and developments. These would also have the potential to increase adverse effects. Notwithstanding this, there would be one layer of mitigation, through the existing statutory planning and consent framework.

Table 4.1 below provides a comparative evaluation of alternatives against SEOs (for detailed SEOs please refer to Table 3.1).

**Table 4.1 Comparative Evaluation of Alternatives against SEOs**

	Likely to <b>Improve</b> status of SEO			<b>Potential Conflict</b> with status of SEOs - likely to be mitigated by complying with other measures included within the Plan		<b>Probable Conflict</b> with status of SEOs- unlikely to be fully mitigated
	to the <b>Greatest</b> degree	to <b>Moderate</b> degree	to a <b>Lesser</b> degree	to a <b>Moderate</b> degree	to a <b>Greater</b> degree	
Alternative 1: Business as Usual			✓		✓	
Alternative 2A: A Plan with Additional Requirements for Environmental Protection and Management	✓			✓		
Alternative 2B: A Plan without Additional Requirements for Environmental Protection and Management		✓			✓	

### **4.3 Selected Alternative for the Plan**

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

## Section 5 Summary of Effects arising from Plan

**Table 5.1 Overall Findings – Environmental Effects arising from Draft Plan Provisions**

Environmental Component	Environmental Effects, in combination with the existing statutory planning/decision-making and consent-granting framework <sup>16</sup>		
	<b>Significant Positive Effect, likely to occur</b>	<b>Potential Significant Adverse Effect, if unmitigated</b>	<b>Residual Adverse Non-Significant Effects</b>
<b>Biodiversity and flora and fauna</b>	<ul style="list-style-type: none"> <li>• Contribution towards the protection and management of biodiversity and flora and fauna (in designated sites, including European sites and Wildlife Sites, and Annexed habitats and species, listed species, ecological connectivity and non-designated habitats) including through:               <ul style="list-style-type: none"> <li>○ Visitor management strategies; and</li> <li>○ Plan requirements for environmental protection and management.</li> </ul> </li> <li>• Contributes towards the maintenance of existing green infrastructure and its ecosystem services.</li> <li>• Contribution towards protection of biodiversity and flora and fauna as a result of contributing towards the protection of environmental vectors, air, water and soil.</li> </ul>	<p>Arising from both construction and operation of tourism related development/activities:</p> <ul style="list-style-type: none"> <li>• Loss of/damage to biodiversity in designated sites (including European sites and Wildlife Sites) and Annexed habitats and species, listed species, ecological connectivity and non-designated habitats; and disturbance to biodiversity and flora and fauna;</li> <li>• Habitat loss, fragmentation and deterioration, including patch size and edge effects; and</li> <li>• Disturbance (e.g. due to noise and lighting along transport corridors) - and displacement of protected species such as birds and bats.</li> </ul>	<ul style="list-style-type: none"> <li>• Loss of an extent of non-protected habitats and species arising from the replacement of semi-natural land covers with artificial surfaces arising from projects consented through the statutory planning/consent-granting framework.</li> <li>• Losses or damage to ecology (these would be: in compliance with relevant legislation; and mitigated as projects would demonstrate compliance with various environmental protection and management measures)</li> </ul>
<b>Population and human health</b>	<ul style="list-style-type: none"> <li>• Contribution towards the protection of human health including through Plan requirements for environmental protection and management.</li> <li>• Contribution towards the protection of human health as a result of not directing additional tourists towards specific locations in instances where significant problems with critical infrastructure (drinking water, wastewater, waste and transport) have been identified.</li> <li>• Contribution towards the protection amenity usage and access.</li> <li>• Contribution towards the sustainable growth of tourism and associated sustenance and growth of communities in the Killarney area.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential interactions if effects upon environmental vectors such as water are not mitigated.</li> <li>• Potential interactions if additional tourists are directed towards specific locations in instances where significant problems with critical infrastructure (drinking water, wastewater, waste and transport) have been identified.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential interactions with residual effects on environmental vectors. This has been mitigated by provisions that have been integrated into the Plan, including those relating to sustainable development, environmental protection and environmental management.</li> </ul>

<sup>16</sup> Effects include in-combination effects – those arising from services, infrastructure and other development (to service development, including tourism) that are planned for and consented through the statutory framework including the NPF, RSES and lower-tier land use plans. Examples may include developments/operation of developments relating to water services, transport, access or accommodation. Mitigation includes that which has been integrated into the Plan – please refer to Section 9 of this report.

Environmental Component	Environmental Effects, in combination with the existing statutory planning/decision-making and consent-granting framework <sup>16</sup>		
	Significant Positive Effect, likely to occur	Potential Significant Adverse Effect, if unmitigated	Residual Adverse Non-Significant Effects
<b>Soil</b>	<ul style="list-style-type: none"> <li>• Various provisions (e.g. relating to maintaining the wildness of areas that have not yet been developed) help to minimise land-take and loss of extent of soil resource.</li> <li>• Contribution towards the protection of the environment from contamination.</li> <li>• Contributes towards protection of designated sites of geological heritage.</li> </ul>	<ul style="list-style-type: none"> <li>• Adverse impacts upon the hydrogeological and ecological function of the soil resource.</li> <li>• Adverse effects on designated geological heritage sites.</li> <li>• Potential for increase in river bank erosion.</li> </ul>	<ul style="list-style-type: none"> <li>• Loss of an extent of soil function arising from the replacement of semi-natural land covers with artificial surfaces.</li> </ul>
<b>Water</b>	<ul style="list-style-type: none"> <li>• Contribution towards the protection of water resources (including the status of surface and groundwaters) and water based designations including through integrating requirements for environmental protection and management into the Plan.</li> <li>• Contribution towards flood risk management and appropriate drainage.</li> </ul>	<ul style="list-style-type: none"> <li>• Adverse impacts upon the status of water bodies and entries to the WFD Register of Protected Areas (ecological and human value), arising from changes in quality, flow and/or morphology.</li> <li>• Increase in flood risk.</li> </ul>	<ul style="list-style-type: none"> <li>• Increased loadings as a result of development to comply with River Basin Management Plan.</li> <li>• Flood related risks remain due to uncertainty with regard to extreme weather events – however such risks will be mitigated by: measures that have been integrated into the Plan; and the statutory planning/consent-granting framework.</li> </ul>
<b>Air and climatic factors</b>	<ul style="list-style-type: none"> <li>• Contribution towards climate adaptation and mitigation through measures relating to: <ul style="list-style-type: none"> <li>◦ Walking and cycling; and</li> <li>◦ Contribution towards European and national objectives for climate adaptation and mitigation, taking into account a wide range of detailed measures including those relating to resilience.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Potential conflict, in combination with plans and programmes from all sectors including transport and land use planning, between increases in visitors (which is likely to result in an increase in greenhouse gas emissions and other emissions to air, including from aviation, with associated interactions with climatic factors) and local, national and European objectives to reduce carbon emissions.</li> <li>• Potential conflicts between transport movements, including car movements, and air quality.</li> </ul>	<ul style="list-style-type: none"> <li>• An increase in travel related greenhouse gas and other emissions to air, including from aviation. This has been mitigated by provisions that have been integrated into the Plan, including those relating to sustainable mobility and compliance with the Climate Action Plan 2019, the National Climate Change Adaptation Framework (2018 and any subsequent versions).</li> <li>• Risks remain due to uncertainty with regard to climate and interactions with issues including flooding and material assets.</li> </ul>
<b>Material Assets</b>	<ul style="list-style-type: none"> <li>• Contributes towards protection and allows for continued use of public assets and infrastructure.</li> <li>• Contains clear objectives around seasonality and regionality which look not only to spread the benefits of tourism but also the potential impacts/ load associated with tourism.</li> <li>• Helps to minimise likelihood of exceeding capacity in material assets as a result of not directing additional tourists towards specific locations in instances where significant problems with critical infrastructure (drinking water, wastewater, waste and transport) have been identified.</li> </ul>	<ul style="list-style-type: none"> <li>• Increased number of visitors have the potential to increase traffic levels.</li> <li>• The need to provide adequate and appropriate water services (it is the function of Irish Water to provide for such needs).</li> <li>• Increases in waste levels and residual wastes from visitors and construction of developments.</li> <li>• Potential impacts upon public assets and infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>• Residual wastes to be disposed of in line with higher level waste management policies.</li> <li>• Increased loading on critical infrastructure (drinking water, wastewater, waste and transport) where no significant problems have been identified with this infrastructure.</li> <li>• Exceedance of capacity in critical infrastructure risks remain due to uncertainty with regard to climate – however such risks will be mitigated by: measures that have been integrated into the Plan; and the statutory planning/consent-granting framework.</li> </ul>

Environmental Component	Environmental Effects, in combination with the existing statutory planning/decision-making and consent-granting framework <sup>16</sup>		
	Significant Positive Effect, likely to occur	Potential Significant Adverse Effect, if unmitigated	Residual Adverse Non-Significant Effects
	<ul style="list-style-type: none"> <li>Contribution towards compliance with national and regional water services and waste management policies.</li> </ul>		<ul style="list-style-type: none"> <li>Any impacts upon public assets and infrastructure to comply with statutory planning/consent-granting framework.</li> </ul>
<b>Cultural Heritage</b>	<ul style="list-style-type: none"> <li>Contribution towards the long-term protection of archaeological and architectural heritage by encouraging greater levels of awareness and appreciation through, use, interpretation and access, in line with the requirements relating to the protection of cultural heritage including: entries to the Record of Monuments and Places and/or their context; and entries to the Records of Protected Structures and Architectural Conservation Areas and their context.</li> </ul>	<ul style="list-style-type: none"> <li>Potential effects on designated and unknown archaeological heritage.</li> <li>Potential effects on architectural heritage.</li> </ul>	<ul style="list-style-type: none"> <li>Potential alteration to the context and setting of architectural heritage however, these will occur in compliance with legislation.</li> <li>Potential alteration to the context and setting of archaeological heritage however, this will occur in compliance with legislation.</li> <li>Potential loss of unknown archaeology however, this loss will be mitigated by measures integrated into the Plan.</li> </ul>
<b>Landscape</b>	<ul style="list-style-type: none"> <li>Contribution towards the protection of landscape designations as a result of: facilitating compliance with relevant plans; and maintaining the wildness of areas that have not yet been developed.</li> </ul>	<ul style="list-style-type: none"> <li>Occurrence of adverse visual impacts, especially in marine, island and ridge areas where, and conflicts with the appropriate protection of statutory designations relating to the landscape.</li> <li>Changes in the appearance of the landscape.</li> </ul>	<ul style="list-style-type: none"> <li>Residual visual effects (these would comply with landscape designation provisions).</li> </ul>

## Section 6 Mitigation and Monitoring Measures

### 6.1 Mitigation

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

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

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

Mitigation was achieved through the following:

- Establishing the status of the Plan and its interrelationship with the Statutory Decision-Making and Consent-Granting Framework<sup>17</sup>; and
- Integrating Requirements for Environmental Compliance into the Plan<sup>18</sup>.

The SEA team worked with the Plan-preparation team at Fáilte Ireland in order to help establish the status of the Plan and its interrelationship with the Statutory Decision-Making and Consent-Granting Framework.

Implementing the Killarney Destination Experience Development Plan will involve Fáilte Ireland helping to facilitate, promote, support and coordinate stakeholders (including local authorities, other government agencies, tourism operators, communities and visitors) in their activities in a way that is consistent with existing and emerging plans that have been subject to environmental assessment. **The Killarney Destination Experience Development Plan does not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent.**

In order to achieve funding (including promotion) for land use or infrastructural development or land use activities from Fáilte Ireland, Fáilte Ireland's stakeholders shall be required to demonstrate compliance<sup>19</sup> with measures relating to sustainable development, environmental protection and environmental management contained within the following Fáilte Ireland published documents:

- Wild Atlantic Way Operational Programme Appendix 5 "*Site Maintenance Guidelines*" and other relevant measures from the Fáilte Ireland visitor and habitat management guidelines series (and any subsequent replacements); and
- Wild Atlantic Way Operational Programme Appendix 6 "*Environmental Management for Local Authorities and Others*" (and any subsequent replacements).

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

- Requirements for lower-tier environmental assessment, including EIA and AA;
- Statutory land use plans that form part of the statutory decision-making and consent-granting framework (e.g. Development Plans, such as the existing Kerry County Development Plan 2015-2021 and the emerging Kerry County Development Plan 2022-2028 and Killarney Municipal District Local Area Plan 2018-2024) and that have undergone environmental assessment, as appropriate, including various provisions relating to sustainable development, environmental protection and environmental management<sup>20</sup>; and

<sup>17</sup> This framework includes various environmental requirements.

<sup>18</sup> These requirements include those that have arisen through the SEA and/or AA processes.

<sup>19</sup> Demonstration of compliance may be supported by monitoring undertaken by the beneficiary.

<sup>20</sup> For more information please refer to Appendix II of this report or the website of the relevant public authority.

- The Climate Action Plan 2021 and the National Climate Change Adaptation Framework (2018 and any subsequent versions)<sup>21</sup>.

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

## 6.2 Monitoring

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

### Sources

Confirmation of compliance with relevant environmental measures will be a source of information for the Monitoring Programme. This documentation may include monitoring undertaken by beneficiaries to demonstrate compliance with the environmental requirements.

Other existing monitoring sources will be used, including:

- Ireland environmental monitoring programmes (and any subsequent replacements), including the Monitoring Programme for the Wild Atlantic Way, a sub-programme of which will be extended to/reported on for Killarney Destination Experience Development Plan area in order to monitor any effects of visitors;
- Sources maintained by Kerry County Council (such as those arising from the SEA of land use plans) and the relevant authorities e.g. the Environmental Protection Agency, the National Parks and Wildlife Service and the Central Statistics Office; and
- Lower-tier environmental assessment and decision making – including a review of project approvals granted and associated documents – will also be utilised as part of the Monitoring Programme.

### Reporting and Responsibility

Reporting on environmental monitoring will address the indicators set out below. Fáilte Ireland is responsible for the ongoing review of indicators and targets, collating existing relevant monitored data, the preparation of monitoring evaluation report(s), the publication of these reports and, if necessary, the carrying out of corrective action, in combination with the relevant authorities.

Environmental monitoring for the DEDP and other existing/future Fáilte Ireland plans, programmes, etc. may be undertaken and reported on at the same time. The findings of monitoring will be reported on periodically with frequencies to be determined during implementation.

Table 6.1 overleaf shows the current indicators and targets that have been selected for monitoring the likely significant environmental effects of implementing relevant Fáilte Ireland Plans, Programmes, etc. These monitoring measures are updated on an ongoing basis.

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<sup>21</sup> For more information please refer to Section 4.10 and/or Appendix II of this report or the website of the relevant public authority.  
CAAS for Fáilte Ireland



**Table 6.1 Selected Indicators, Targets and Monitoring Sources**

<b>Environmental Component</b>	<b>Indicators</b>	<b>Targets</b>	<b>Source and (where available) Frequency</b>
<b>Biodiversity, Flora and Fauna</b>	B1: Conservation status of habitats and species as assessed under Article 17 of the Habitats Directive	B1: Maintenance of favourable conservation status for all habitats and species protected under National and International legislation to be unaffected by implementation of the Plan <sup>22</sup>	<ul style="list-style-type: none"> <li>• Documentation demonstrating compliance with "Requirements for Environmental Protection and Management"</li> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>• Government report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every 6 years)</li> <li>• Government National Monitoring Report for the Birds Directive under Article 12 (every 3 years)</li> <li>• Consultations with the NPWS</li> <li>• CORINE mapping resurvey (every c. 5 years)</li> <li>• Input from any other existing or replacement Fáilte Ireland monitoring programmes</li> </ul>
	B2: Percentage loss of functional connectivity without remediation resulting from the Plan	B2: No significant ecological networks or parts thereof which provide functional connectivity to be lost without remediation resulting from the Plan	
	B3i: Number of significant impacts on relevant habitats, species, environmental features or other sustaining resources in designated sites including Wildlife Sites resulting from the Plan  B3ii: Number of significant impacts on the protection of listed species	B3i: Avoid significant impacts on relevant habitats, species, environmental features or other sustaining resources in designated sites including Wildlife Sites resulting from the Plan  B3ii: No significant impacts on the protection of listed species resulting from the Plan	
<b>Population and Human Health</b>	PHH1: Occurrence (any) of a spatially concentrated deterioration in human health arising from environmental factors resulting from the Plan, as identified by the Health Service Executive and Environmental Protection Agency	PHH1: No spatial concentrations of health problems arising from environmental factors as a result the Plan	<ul style="list-style-type: none"> <li>• Documentation demonstrating compliance with "Requirements for Environmental Protection and Management"</li> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>• Consultations with the HSE and EPA</li> <li>• Input from any other existing or replacement Fáilte Ireland monitoring programmes</li> </ul>
<b>Soil</b>	S1: Artificial surfaces land cover extent	S1: Contribute towards the target of the National Planning Framework's SEA (2018) to "Maintain built surface cover nationally to below the EU average of 4%."	<ul style="list-style-type: none"> <li>• Documentation demonstrating compliance with "Requirements for Environmental Protection and Management"</li> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>• CORINE mapping resurvey (every c. 5 years)</li> <li>• Input from any other existing or replacement Fáilte Ireland monitoring programmes</li> </ul>
<b>Water</b>	W1i: Classification of Overall Status (comprised of ecological and chemical status) under the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272 of 2009)	W1i: No deterioration in the status of any surface water or adverse effect upon the ability of any surface water to achieve 'good status' as a result of the Plan	<ul style="list-style-type: none"> <li>• Documentation demonstrating compliance with "Requirements for Environmental Protection and Management"</li> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• Data issued under the Water Framework Directive Monitoring Programme for Ireland (multi-annual)</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>• Input from any other existing or replacement Fáilte Ireland monitoring programmes</li> </ul>
	W2: Interactions with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC resulting from development adhering to the Plan	W2: Not to affect the ability of groundwaters to comply with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC, subject to exemptions provided for by Article 4 of the WFD	
	W3: Compliance of relevant lower tier assessments and decision making with the Flood Risk Management Guidelines	W3: For lower tier assessments and decision making to comply with the Flood Risk Management Guidelines	

<sup>22</sup> Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: (a) No alternative solution available; (b) Imperative reasons of overriding public interest for the programme to proceed; and (c) Adequate compensatory measures in place.

SEA Environmental Report Appendix III: Non-Technical Summary

Environmental Component	Indicators	Targets	Source and (where available) Frequency
<b>Air and Climatic Factors</b>	AC1: Demonstration of compliance with provisions relating to climate adaptation and mitigation have been integrated into the Plan	C1: To maximise the amount of measures relating to climate adaptation and mitigation being implemented	<ul style="list-style-type: none"> <li>Documentation demonstrating compliance with "Requirements for Environmental Protection and Management"</li> <li>Lower tier environmental assessment and decision making by local authorities</li> <li>SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>Input from any other existing or replacement Fáilte Ireland monitoring programmes</li> </ul>
<b>Material Assets</b>	M1: Number of instances whereby additional tourists are directed by beneficiaries of funding towards areas in the Plan area where adequate and appropriate critical infrastructure with sufficient capacity is unavailable	M1: No instances whereby additional tourists are directed by beneficiaries of funding towards areas in the Plan area where adequate and appropriate critical infrastructure with sufficient capacity that does not present a danger to human health are unavailable	<ul style="list-style-type: none"> <li>Documentation demonstrating compliance with "Requirements for Environmental Protection and Management"</li> <li>Lower tier environmental assessment and decision making by local authorities</li> <li>SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>Consultations with the partners such as the EPA, Irish Water and/or Kerry County Council</li> <li>Input from any other existing or replacement Fáilte Ireland monitoring programmes</li> </ul>
	M2: Number of significant adverse effects on the use of or access to public assets and infrastructure	M2: No significant adverse effects on the use of or access to public assets and infrastructure	
	M3: Preparation and implementation of construction and environmental management plans	M3: For construction and environmental management plans to be prepared and implemented for relevant projects	
<b>Cultural Heritage</b>	CH1: Percentage of entries to the Record of Monuments and Places protected from significant adverse effects arising from the Plan	CH1: No unauthorised adverse effects on archaeological heritage resulting from implementation of the Plan	<ul style="list-style-type: none"> <li>Documentation demonstrating compliance with "Requirements for Environmental Protection and Management"</li> <li>Lower tier environmental assessment and decision making by local authorities</li> <li>SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>Input from any other existing or replacement Fáilte Ireland monitoring programmes</li> </ul>
	CH2: Percentage of entries to the Records of Protected Structures and Architectural Conservation Areas and their context protected from significant adverse effects arising from the Plan	CH2: No unauthorised adverse effects on architectural heritage resulting from implementation of the Plan	
<b>Landscape</b>	L1: Number of unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in the Development Plans and other statutory land-use plans	L1: No unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in the Development Plans and other statutory land-use plans	<ul style="list-style-type: none"> <li>Documentation demonstrating compliance with "Requirements for Environmental Protection and Management"</li> <li>Lower tier environmental assessment and decision making by local authorities</li> <li>SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>Input from any other existing or replacement Fáilte Ireland monitoring programmes</li> </ul>