

# SEA ENVIRONMENTAL REPORT

## APPENDIX III – NON-TECHNICAL SUMMARY

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FOR THE

### LIMERICK DESTINATION EXPERIENCE DEVELOPMENT PLAN

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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 Limerick Destination Experience Development Plan (hereafter referred to as "DEDP" or "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 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 Plan

### 2.1 Overview

The Limerick DEDP provides a five-year focus to deliver a collective ambition to transform Limerick into a compelling visitor destination and a base for exploring the Wild Atlantic Way. The Plan reflects a new destination focus required in the short and medium term to address the 'new normal' operational environment and how domestic and overseas visitors are welcomed back to the destination after the COVID-19 pandemic.

It will combine the Limerick City experience with the rich countywide experiences to support short-term tourism recovery and growth. By adopting this co-ordinated approach, Limerick will increase the range of day and evening experience options for visitors, delivered in a continuously improving visitor environment. It will promote continuous tourism innovation aligned with the city's new 'Atlantic Edge, European Embrace' destination brand, supported by its resilient character that has propelled the city into becoming an acclaimed, international economic destination.

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.

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).

A Vision for Limerick DEDP is: *"It's 2025 and Limerick, a Wild Atlantic Way Gateway City has established itself as a leisure tourism destination. The choice of things to see and do by day or night has developed the city's reputation as an excellent base for touring the Wild Atlantic Way. Limerick has become a regional hub for exploration, with visitors attracted by the range of Limerick experiences, quality accommodation and the ease of access to an edgy and dynamic university city."*

The Plan's objectives are:

- Establish Limerick as a key destination in the leisure tourism market for domestic and international visitors.
- Provide a short to medium-term focus for post COVID-19 recovery while building resilience in the long-term through a new strategic destination development approach.
- Create the tourism structures for long-term tourism success from the 'Limerick Destination Experience Development Implementation Group' that will leverage future tourism opportunities for the City working with the county-wide tourism base.
- Assess opportunities for Limerick to develop a major international tourism attraction that will become a tourism catalyst/hero project for the city, potentially aligned to the city and third level partners' association with the science, tech and engineering sectors.
- Maximise the potential of existing hero attractions, assessing and developing their capacity to grow visitor numbers and improve the overall visitor experience. e.g. King John's Castle, St. Mary's Cathedral, The Hunt Museum, Limerick Civic Trust attractions and Limerick Museum.
- Examine how the potential of key city assets can be maximised to develop new visitor experiences that reflect global urban tourism trends, such as the Limerick Milk Market as a key focal point for City experiences such as food, culture and arts.

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

- Develop the range and quality of the Limerick Festivals and Events portfolio to attract new domestic and international audiences to Limerick.
- Enhance and market existing saleable experiences while establishing new tourism experiences to attract visitors to Limerick.
- Contribute to sustainable destination development through adopting the Visitor, Industry, Community and Environment (VICE) model as international best practice to develop tourism in a responsible way in Limerick.
- Maximise the opportunity provided by the creation of a coherent destination approach for Limerick, communicating the essence of the place, its people and highlighting its designation as a Wild Atlantic Way Gateway City.
- Enhance visitor flow and orientation into the city and throughout its City Districts.
- Work with all stakeholders to improve the aesthetic appearance of the city, fostering community and stakeholder ownership and improving the presentation of Limerick City for visitors.
- Improve the variety and quality of the current evening offering and address existing gaps such as accessibility to attractions, retail outlets, restaurants and live music, particularly traditional Irish music.
- Prepare for the hosting of the 2027 Ryder Cup in Adare to maximise the destination opportunity and associated legacy benefits that major events can deliver.
- Development of a strong city tourism destination that will support increased levels of international air access through Shannon International Airport while growing air connectivity directly to the Wild Atlantic Way.

In achieving the Plan's objectives guided through the **Destination Enablers**, each contains a number of **Destination Projects**, as follows:

#### **Tourism City**

- Project 1 – Quarters Model
- Project 2 – Public Realm & Visitor Orientation
- Project 3 – City Trails
- Project 4 – Festivals and Events
- Project 5 – Tourism Opportunity Sites

#### **The Limerick Experience**

- Project 6 – Limerick Experiences Network
- Project 7 – Urban Adventure
- Project 8 – Limerick Food and Drink Experience

#### **Industry Innovators**

- Project 9 – Industry Capacity & Knowledge
- Project 10 – Evening Economy
- Project 11 – Sustainable Tourism Destination
- Project 12 – Smart Tourism City

#### **Destination Competitiveness**

- Project 13 – Business Tourism
- Project 14 – Destination Brand and Communications
- Project 15 – Limerick for Tourism

These are developed under the themes of **Distinctive Districts** and **Urban Edge**, aligned with the uniqueness of the various urban districts within the city and the ability of visitors to access the new Limerick saleable, visitor experiences.

The following **Catalyst Projects** are designed to to deliver destination change and create the platform for tourism growth:

- Limerick Districts
- City Trials
- King's Island
- Urban Adventure
- Limerick for Tourism

## **2.2 Relationship with other relevant Plans and Programmes**

The Limerick DEDP 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. These other existing policies, plans etc. 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 RSESs set out various objectives relating tourism development and activities that have been subject to environmental assessment. The RSESs have informed, and continue to inform, the preparation of lower-tier Development Plans and Local Area Plans, which also set out various

objectives relating to tourism development and activities that have been subject to environmental assessment.

Implementation of the Limerick 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 Limerick 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 Limerick DEDP is not part and does not contribute towards.

## 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 Plan and in order to determine appropriate monitoring measures.

### 3.2 Likely Evolution of the Environment in the Absence of the 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 Limerick City area to which the Plan relates; and
- **Aquatic and riverine ecology** associated with the various streams rivers and estuaries including the River Shannon, the River Fergus and their estuaries.

Land cover types for the Plan area 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 (**Lower River Shannon SAC and River Fergus Estuaries SPA**), 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. 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.

<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.

### 3.4 Population and Human Health

The 2022 Census data identifies the population of the Limerick City and Suburbs, including the area to which the Plan relates, as being 102,287 persons.

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.

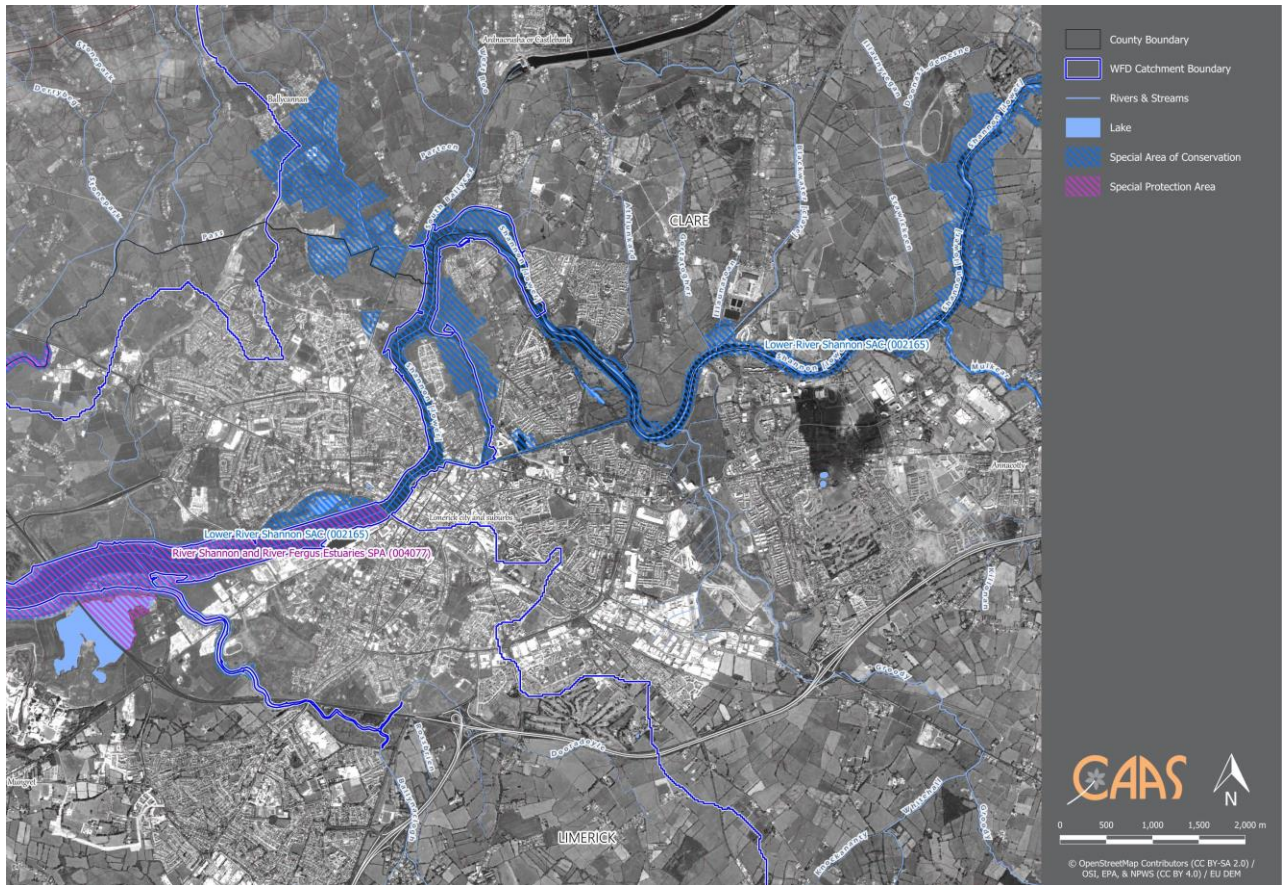
### 3.5 Soil

Urban and man-made soils make up most of the area to which the Plan relates.

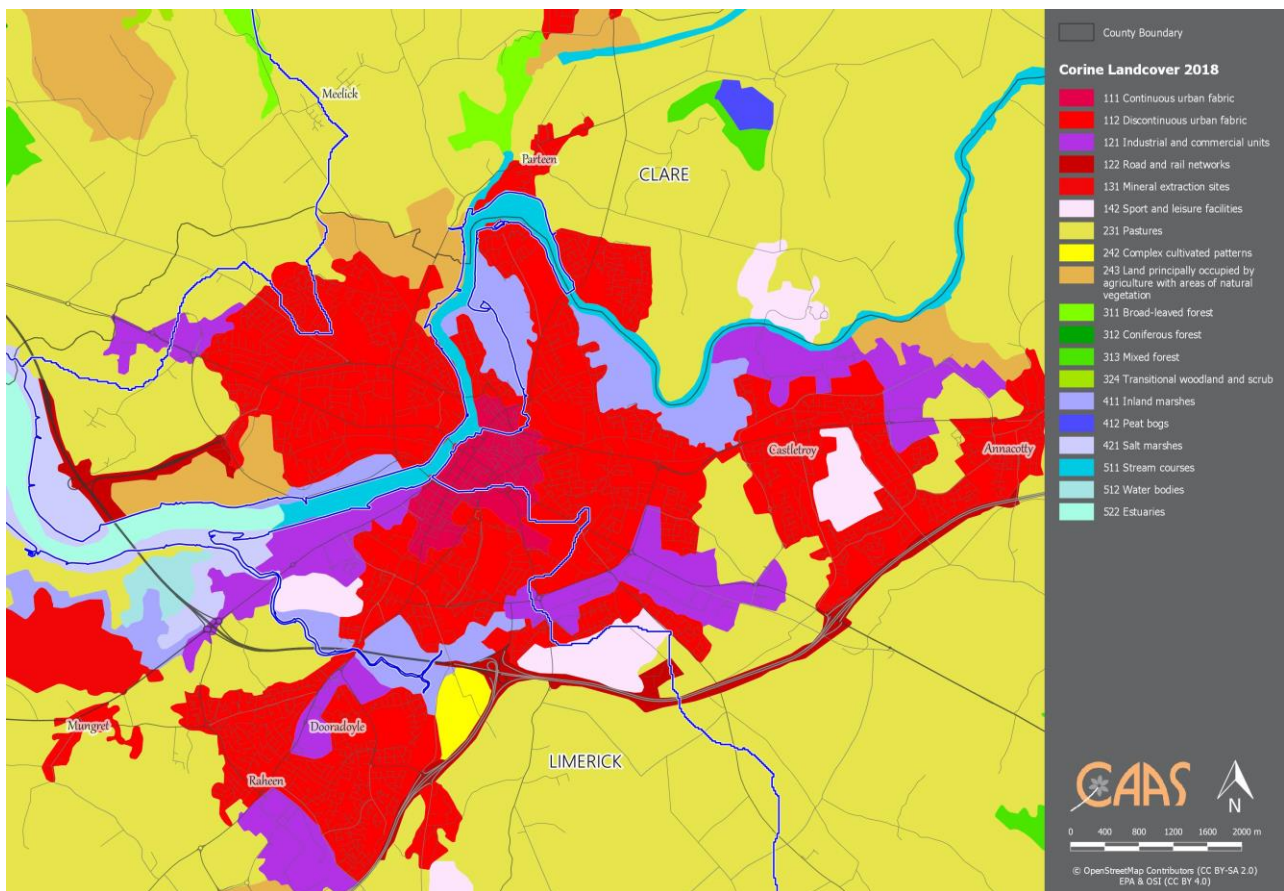
Geological Survey of Ireland coordinates the Irish Geological Heritage Programme, which seeks to identify and select sites of geological interest within each county across the country. The audit of County Geological Sites in County Limerick was completed in 2021 and identified two CGSs (Mungret Quarry and N18 Road Cut Ballykeeffee) as located in the south-western parts of the area to which the Plan relates.

The GSI have identified the area to which the Plan relates as having low and low (inferred) levels of landslide susceptibility with some areas of moderately low and moderately high.





**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 (2016-2021) for rivers and transitional waters, within and surrounding the area to which the Plan relates is shown on Figure 3.3. The main river in the area is the River Shannon.

There are a number of *unassigned*<sup>4</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 *good* and *moderate* however, sections<sup>5</sup> of rivers and streams identified by the EPA as "Crompaun (East)\_10", "Whitehall\_10" and transitional waterbodies "Upper Shannon Estuary" and "Limerick Dock" are identified as being of *poor* due to unsatisfactory ecological/biological and/or physio-chemical status.

The WFD groundwater status (2016-2021) 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*.

### Flooding

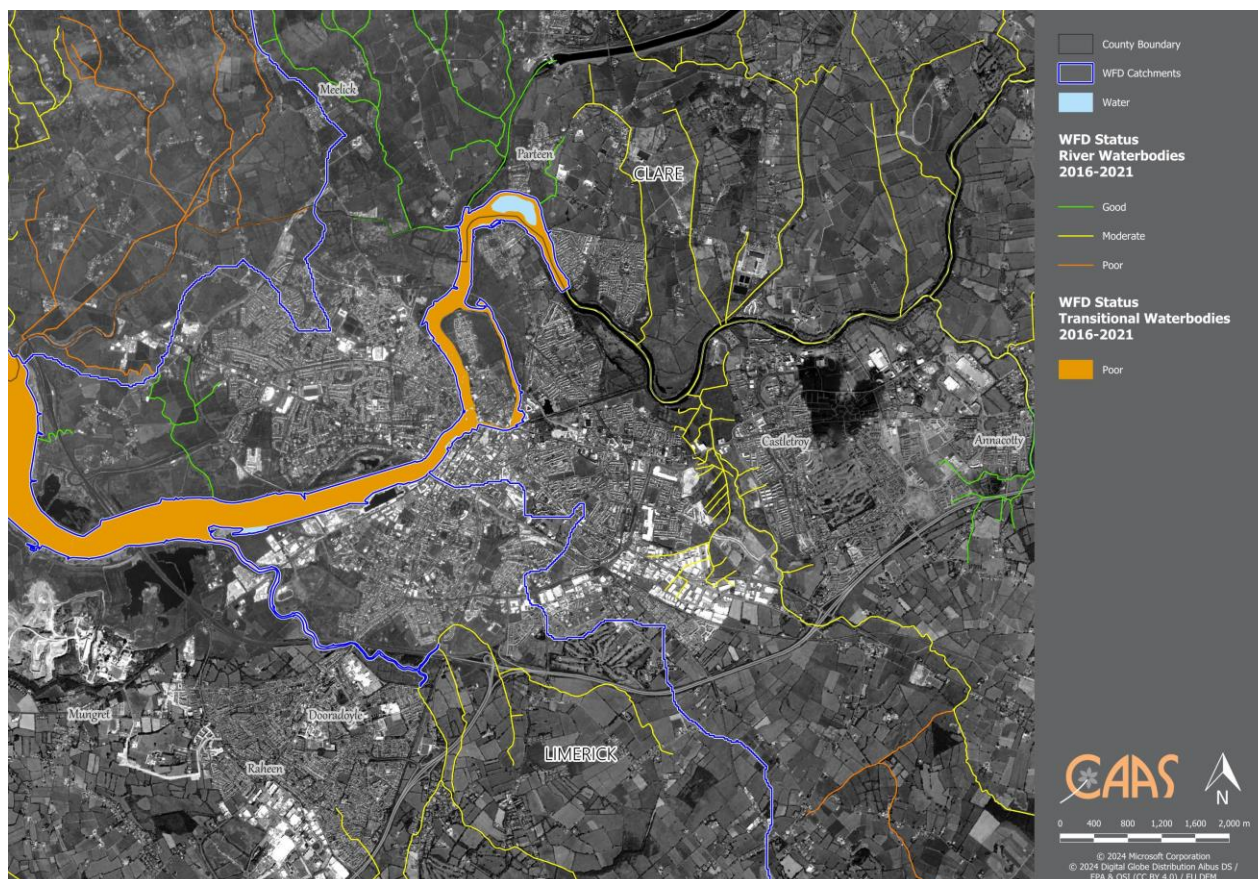
Certain areas across the area to which the Plan relates are at risk from pluvial<sup>6</sup> and fluvial<sup>7</sup> flooding. Historical flooding is documented at a number of locations, including along the River Shannon in the centre of the area to which the Plan relates.

<sup>4</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>5</sup> As per EPA classification system ([gis.epa.ie/EPAMaps](http://gis.epa.ie/EPAMaps)).

<sup>6</sup> Resulting from high intensity rainfall events where run-off volume exceeds capacity of surface water network.

<sup>7</sup> Watercourse capacity is exceeded or the channel is blocked and excess water spills from the channel onto adjacent floodplains.



**Figure 3.3 Surface Water Status (2016-2021)**

### 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 National Climate Action Plan 2023 provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting Ireland on a path to reach net-zero emissions by no later than 2050, as set out in the Climate Act 2021. The Plan lists the actions needed to deliver on climate targets and sets indicative ranges of emissions reductions for each sector of the economy. It will be updated periodically, to ensure alignment with legally binding economy-wide carbon budgets and sectoral ceilings.

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.<sup>8</sup>

<sup>8</sup> For more detail on current daily air quality data for the Plan refer to: <https://gis.epa.ie/EPAMaps/>. CAAS for Fáilte Ireland

## 3.8 Material Assets

### Wastewater

The most recent Uisce Éireann compliance reports for the wastewater treatment plants serving the area to which the Plan relates, provide information on the environmental performance and wastewater discharge licence compliance of the following WWTPs<sup>9</sup>.

Uisce Éireann, working in partnership with Limerick City and County Council, is investing 2.5 million euro to undertake essential upgrade works to wastewater treatment plants in towns and villages across County Limerick. These improvement works include upgrades to the inlet works, storm water management and sludge treatment and storage facilities. Capacity improvements will help to support new development in these areas, including tourism related development.<sup>10</sup>

### Water Supply

Drinking water supply in the area to which the Plan relates is provided by private/public water supply schemes, including the Limerick City Environs 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 Limerick City Environs PWS is currently listed on the most recent EPA Remedial Action List (Q2 of 2023) due to elevated levels of trihalomethanes (THMs) above the standard in the Drinking Water Regulations.

### Public Assets and Infrastructure

Limerick City is the largest settlement in the area to which the Plan relates and is Ireland's third largest city. Limerick-Shannon is designated a Metropolitan Area by the Southern Regional Spatial Economic Strategy and falls under the Limerick-Shannon Metropolitan Area Strategic Plan.

The area to which the Plan relates is served by rail, bus, cycle network, and regional and strategic roads. The ports and harbours located adjacent to the west of the area have many functions including transport, fishing, marine leisure and tourism. The Shannon Airport also serves the area to which the Plan relates.

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.

There are three Region Waste Management Plans in Ireland and these will be replaced by a new National Waste Management Plan for a Circular Economy, which will take account of the various measures outlined in A Waste Action Plan for A Circular Economy - Ireland's National Waste Policy 2020-2025.

<sup>9</sup> Uisce Éireann (2022) *Annual Environmental Reports (AERs)*

<sup>10</sup><https://www.water.ie/projects-plans/limerick-wastewater-treat/>

## 3.9 Cultural Heritage

### Archaeological Heritage

Archaeological heritage is protected under the National Monuments Acts (1930-2004), Natural 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 and associated SMR and RMP Zones of Notification within and surrounding the area to which the Plan relates. These include National Monuments in State Care: Kilrush Church; King John's Castle; and Fanning's Castle.

### 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 the historic City of Limerick as shown on Figure 3.4. Notable structures include: St. John's Cathedral (which retains the highest spire in Ireland); Poorman's Kilkee pier and quay; the Masonry Bridge and cast-iron structure (erected in the 1820's to provide a crossing over the Shannon); and the Franciscan Friary. Other significant buildings within the area to which the Plan relates include: Limerick Museum; Limerick City Gallery of Art; the Hunt Museum; and the Milk Market.

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. ACAs designated across the area to which the Plan relates (shown on Figure 3.4), include: South City Centre and Newtown Pery/South Circular Road and New Street/O'Connell Avenue; John's Square; Ballinacurra Road; and Ennis/Shelbourne Road.

## 3.10 Landscape

The area to which the Plan relates comprises a combination of natural and urban environments. The Shannon estuary runs through the centre of the area to which the Plan relates, stretching into the Atlantic Ocean on Ireland's south-west coast. The City centre and surrounding hinterlands are largely urban, containing a variety of heritage sites, public parks, trees and open spaces.

The existing Limerick Development Plan 2022-2028 identifies ten Landscape Character Areas and Views and Prospects within the Council's administrative area. The area to which the Plan relates is identified as being situated adjacent to the Shannon Integrated Coastal Management Zone (ICMZ) and Agricultural Lowlands.

The landscape designations provided for by the Limerick Development Plan 2022-2028 assessing planning applications. These designations include Views and Prospects. View types within the area to which the Plan relates include: Linear Views of Landmark Buildings; the City Walls and City Skyline; River Prospects; and Approach Road Views.

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.



Figure 3.4 Archaeological Heritage

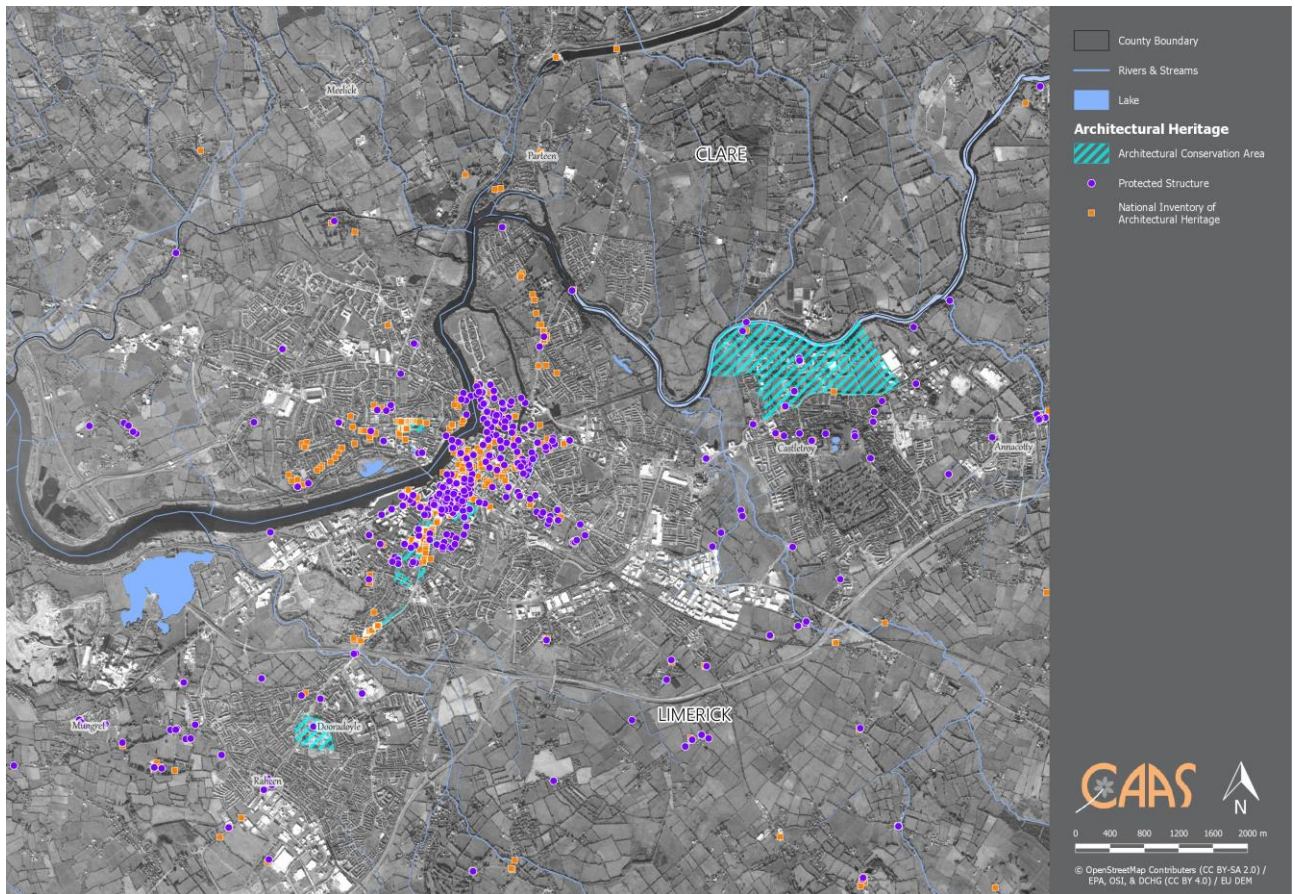


Figure 3.5 Architectural Heritage

### 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 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>11</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>12</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; and air quality and noise and management objectives.
<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>11</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>12</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:

- Quality of built heritage throughout the City.
- Riverside position and quality of riverside public realm.
- Existence of strong city districts that bring visitors through the Limerick historical journey e.g. King's Island and Georgian District.
- Connected and compact nature of the core of the City.
- Depth of County wide tourism experiences from unique heritage and cultural to best in class outdoor experiences.
- International City profiling through sports event hosting.
- International success as location for foreign direct investment and quality economic destination.
- Development of new destination brand model.
- Range of cultural provision from visual to performing arts.
- Internationally acclaimed art events and home to international School of Art and Design.
- Quality of food offerings, food heritage and diversity of dining options.
- Range of established festivals and events.
- Uniqueness of City centre sites e.g. Milk Market and capacity for multi-purpose use.
- Third level colleges, student vibrancy and new UL City centre location.
- Range and quality of accommodation base in the City.
- Proven capacity to attract and host major events and conferences.

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

- Lack of cooperative approach to achieve the tourism potential of Limerick City in contrast to other economic sectors.
- Limited access to saleable local experiences that communicate the authenticity and uniqueness of Limerick City.
- Quality of current visitor orientation, signage and wayfinding for visitors to the City is poor.
- Dominance of business tourism in current occupancy levels achieved by city accommodation providers i.e. occupancy dominated midweek by the business sector.
- Limerick not perceived as a leisure tourism destination.
- Lack of programming by international tour operators.
- City centre retail experience is being challenged by city suburb shopping outlets reducing footfall and city centre vibrancy.
- Limited evening economy provision and lack of non-alcoholic entertainment options in the evening and current scale of evening economy provision.
- Limited focus on fostering tourism entrepreneurs and small businesses with tourism appeal.
- Absence of significant levels of footfall in the City centre outside of peak business period.
- Limited number of businesses open in the City centre in the evening that will generate footfall.
- City centre and other districts are not leveraging the existing visitor attraction numbers to King's Island to disperse visitors throughout the City.
- No sustained inputting to a centralised Limerick calendar of events to communicate to potential visitors.
- Limited access to artisan produce telling the Limerick story.
- Lack of a co-ordinated destination narrative being communicated on a sustained basis.
- Strong cultural themes such as arts not being maximised to allow the visitor engage in a variety of art experiences despite the existence of the internationally acclaimed School of Art and Design.
- Industry collaboration to co-create experiences that will increase destination dwell time.
- Urban adventure activities limited around the use of the river.
- Recognition among wider ancillary services of opportunity tourism provides e.g. retail, food and beverage.
- Limerick hotels are largely programmed by tour operators for only one night stays.

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
- Limerick 2030 – An Economic and Spatial Plan for Limerick
- Limerick Tourism Development Strategy and Action Plan 2019 – 2023
- Limerick Development Plan 2022-2028
- Limerick City and County Heritage Plan 2017 – 2030
- National Planning Framework
- Southern Regional Spatial and Economic Strategy
- Wild Atlantic Way Regional Tourism Development Strategy



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 Limerick City 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 in leisure visitor numbers (domestic and international) to Limerick by 2% YoY ahead of the national average from year 3 of implementation, measured by occupancy and visitor attraction numbers.
- Increased saleable product (5 new saleable experience per annum) and improved distribution.
- Increased visitor satisfaction – benchmarked through NPS and TripAdvisor
- Opening hour extension – 5% increase 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 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 Limerick City 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 in an increase in travel related greenhouse gas and other emissions to air, including from aviation, would not occur as a result 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, 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 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 Limerick City 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 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 2023, 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 (and associated effects), 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 Limerick City 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 Limerick City 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 Limerick City 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 Plan Provisions**

Environmental Component	Environmental Effects, in combination with the existing statutory planning/decision-making and consent-granting framework <sup>13</sup>		
	Significant Positive Effect, likely to occur	Potential Significant Adverse Effect, if unmitigated	Residual Adverse Non-Significant Effects
<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>The 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 The 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 Limerick City 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>
<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> </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</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</li> </ul>

<sup>13</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.

SEA Environmental Report Appendix III: Non-Technical Summary

Environmental Component	Environmental Effects, in combination with the existing statutory planning/decision-making and consent-granting framework <sup>13</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 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>	<p>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.</p> <ul style="list-style-type: none"> <li>Potential conflicts between transport movements, including car movements, and air quality.</li> </ul>	<p>the Plan, including those relating to sustainable mobility and compliance with the Climate Action Plan 2023, the National Climate Change Adaptation Framework (2018 and any subsequent versions).</p> <ul style="list-style-type: none"> <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> <li>Contribution towards compliance with national and regional water services and waste management policies.</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> <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 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>14</sup>; and
- Integrating Requirements for Environmental Compliance into the Plan<sup>15</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.

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>16</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 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 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 Limerick Development Plan 2022-2028) and that have undergone environmental assessment, as appropriate, including various provisions relating to sustainable development, environmental protection and environmental management<sup>17</sup>; and
- The Climate Action Plan 2023 and the National Climate Change Adaptation Framework (2018 and any subsequent versions)<sup>18</sup>.

<sup>14</sup> This framework includes various environmental requirements.

<sup>15</sup> These requirements include those that have arisen through the SEA and/or AA processes.

<sup>16</sup> Demonstration of compliance may be supported by monitoring undertaken by the beneficiary.

<sup>17</sup> For more information please refer to Appendix II of this report or the website of the relevant public authority.

<sup>18</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.

Further measures relating to infrastructure capacity, visitor management and green infrastructure and ecosystem services 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:

- Information gathered through existing Fáilte 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 the **Limerick DEDP** area in order to monitor any effects of visitors;
- Sources maintained by **Limerick City and 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 Plan 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.

**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>19</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>19</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, Uisce Éireann and/or Limerick City and 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>