

SEA ENVIRONMENTAL REPORT

APPENDIX III – NON-TECHNICAL SUMMARY

FOR THE

BURREN AND CLIFFS OF MOHER VISITOR EXPERIENCE DEVELOPMENT PLAN

for: Fáilte Ireland
88-95 Amiens Street
Dublin 1



by: CAAS Ltd.
1st Floor
24-26 Ormond Quay Upper
Dublin 7



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Section 1 Introduction and Terms of Reference

This is the Non-Technical Summary of the Environmental Report for the Burren and Cliffs of Moher Visitor 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 has been 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 Visitor Experience Development Plan's (VEDP's) **vision** is to: *'Increase dwell time and inspire visitors and the next generation to become custodians of the Burren and Cliffs of Moher'*.

The **key objectives** of the Burren and Cliffs of Moher VEDP are to develop hero, supporting and ancillary experiences for the region that will:

- Motivate visitors to stay longer and spend more;
- Extend the length of the season;
- Align to relevant brand, target markets and segments;
- Sustain and increase job creation in the local area; and
- Protect the special environmental character of the region.

Central to the VEDP is the **Action Plan** that arranges various **recommendations** (including nine **Catalyst Projects** and **other Actions**) under seven **Hero Experiences** and four **Enablers of Success**.

Catalyst Projects recommended are as follows:

1. Develop and implement an Integrated Traffic and Transport Strategy for the Burren and Cliffs of Moher.
2. Upgrade 2km of the Cliff Walk (1km either side of the Cliffs of Moher Visitor Centre) through a partnership with land owners and National Parks to develop a management plan and future funding model that supports the land owners and allows for reinvestment and a sustainable walking infrastructure.
3. Develop a winter Burren Music, Dance & Story Trail connecting visitors with music, dance, stories and traditions of the place – people and villages.
4. Create a 'Wellness the Wild Atlantic Way' programme and dedicated section on the Fáilte Ireland website that looks at the broader definition of 'wellness' including connection, time in nature, and the need to sleep well, as well as the traditional, relaxation, healthy food and exercise elements.
5. Develop the Burren Discover Trail to assist in dispersing independent travellers eastward to the Burren Lowlands and provide interpretive content to interpret the landscape and reveal the underlying stories.
6. Support farmers keen to diversify their business to include tourism with a business support programme and guidance on insurance and planning requirements and investment in sustainable tourism experiences.
7. Be a Custodian for a day - join the Geopark to experience what is involved in managing a Global Geopark.
8. Facilitate workshop(s) to assist in further developing and promoting a series of cultural events that encourage year-round visitation through dedicated timely funding.
9. Encourage the establishment of new eco-friendly, responsible adventure experiences such as new cycling experiences along the green roads including mountain-biking and the 'edge' experience.

Hero Experiences are as follows:

1. Walk on the Edge of the World along the Cliffs of Moher.
2. Adventure On and Under in the Burren: diving, surfing, caving – 'the Edge'.
3. Walk the Burren Way through the Living Landscape shaped by 360 million years of water and Thousands of Years of Farming Traditions.
4. See Life shaped by the Ancient Farming Landscape of the Burren to see the Ancient Traditions Continue.
5. Experience Wellness the Wild Atlantic Way through Immersion of the Senses
6. Savour the Unique Local Flavours of the Burren.
7. Immerse yourself in the Music and Dance of the Burren and see the Lineage of Stories, Songs & Sounds of the Sea.

Enablers of Success recommended are as follows:

1. Visitor Management and Dispersal.
2. Better Collaboration Between Groups.
3. Inspire and Create Confidence in Sharing Stories.
4. Effective Marketing and Promotion.

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 compliance¹ 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 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 for the next 22 years. The NPF is to be implemented through Regional Spatial and Economic Strategies (RSESs) and lower tier Development Plans and Local Area Plans. The RSESs for the Southern Region and the Northern and Western Region set 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. When adopted, the RSESs will inform the review of existing, assessed 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 Plan shall be consistent with and conform with the NPF, RSESs 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 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.

¹ 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 Burren and Cliffs of Moher² 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 comprise:

- Rare limestone habitats including orchid-rich calcareous grasslands (supporting a high diversity of plants and animals)³;
- Extensive network of wetlands and associated aquatic and riverine ecology;
- Coastal areas and associated marine and ecology; and
- Habitats associated with geological features, including bare rock pavements, cliffed and terraced hills and caves.

The most dominant CORINE land cover types for the Burren and Cliffs of Moher area are pastures, agricultural lands and peat bogs.

A significant portion of the area to which the Plan relates, its coastline and its surrounding waters are designated as European Sites (mapped on Figure 3.1). European Sites in the area to which the Plan relates occur in the greatest concentrations along the coastline and in upland areas. European Sites comprise:

- Special Areas of Conservation⁴ (SACs), including candidate SACs; and
- Special Protection Areas⁵ (SPAs).

There are number of SACs designated within and adjacent to the Burren and Cliffs of Moher area including Black Head-Poulsallagh Complex SAC , Moneen Mountain SAC , Inagh River Estuary SAC , Galway Bay Complex SAC , East Burren Complex SAC , Ballyvaughan Turlough SAC , Ballyteige (Clare) SAC .There are number of SPAs designated within and adjacent to the area to the Burren and Cliffs of Moher area including Inner Galway Bay SPA , Cliffs of Moher SPA , Corofin Wetlands SPA , Coole-Garryland SPA and Mid-Clare Coast SPA .

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

² The area to which the Plan relates covers part of the Burren and Cliffs of Moher area in County Clare and County Galway.

³ 7 of the 9 bat species and 28 of Ireland's 30 butterfly species are found in the Burren, and over 70 species of land snails - (<http://www.burrengeopark.ie/learn-engage/geology-of-the-burren/flora-and-fauna/>).

⁴ 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. The Regulations have been prepared to address several judgments of the Court of Justice of the European Union (CJEU) against Ireland, notably cases C-418/04 and C-183/05, in respect of failure to transpose elements of the Birds Directive and the Habitats Directive into Irish law.

⁵ 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.

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. To date the surveys have covered 43 sites and monitored the activities and effects of over 20,000 visitors to WAW discovery points.

This extensive database demonstrates that over 85% of visitors observed at WAW discovery points are having low or no effects on the ecological features or processes at these sites.

3.4 Population and Human Health

Using the 2016 Census data, the population of the Electoral Divisions in the Burren and Cliffs of Moher and surrounding areas was estimated to be 15,572 persons⁶. The population of the biggest settlements in the Burren and Cliffs of Moher area was: 1,045 persons in Ennistymon; 829 persons in Lisdoonvarna; 734 in Kinvarra; and 638 in Lahinch.

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. Both Counties Clare and Galway include a number of High Radon Area, as identified by the EPA – High Radon Areas are identified by the EPA within most counties across the country.

3.5 Soil

Very shallow soils are found over much of the area, especially where the geology is exposed. Much of the Burren and Cliffs of Moher and surrounding areas comprises bare limestone pavement with some soil in the valleys of the area and in enclosed depressions in the karst geology.

Geological heritage is significant across the Burren and Cliffs of Moher area, which was designated United Nations Educational, Scientific and Cultural Organisation (UNESCO) Global Geopark in 2011. UNESCO Global Geoparks are single, unified geographical areas where sites and landscapes of international geological significance, managed with a holistic concept of protection, education and sustainable development.

There are number of County Geological Sites across the area to which the Plan relates. The greatest concentrations of County Geological Sites across the Burren and Cliffs of Moher area occur in upland and coastal areas and almost all of them occur within UNESCO Global Geopark (mapped on Figure 3.2).

There are several locations identified within the Burren and Cliffs of Moher area with a history of multiple landslide events. These events occur in upland and coastal areas and include Doonagore (2011) and Ballaghline (1990). The GSI have identified various upland and coastal areas across the area of Burren and Cliffs of Moher that are of high and moderately high levels of landslide susceptibility.

⁶ Total population was estimated using the interactive Census 2016 mapping tool for Small Area Population Statistics (SAPMAP) for the following Electoral Divisions: Abbey, Carran, Noughaval/Castletown, Derreen, Drumcreehy, Gleninagh, Lisdoonvarna, Mountelva, Oughmama, Rathborney, Glenoroe/Ballyeigher, Boston, Corrofin, Killinaboy, Kiltoragh, Rath, Ballagh, Ballyea, Ballysteen, Cloghaun, Clooney, Ennistimon, Kilfenora, Killaspuglonane, Killilagh, Kilshanny, Lisacannor, Lurraga, Magherareagh, Moy, Smithstown, Doorus, Killinny and Kinavara.

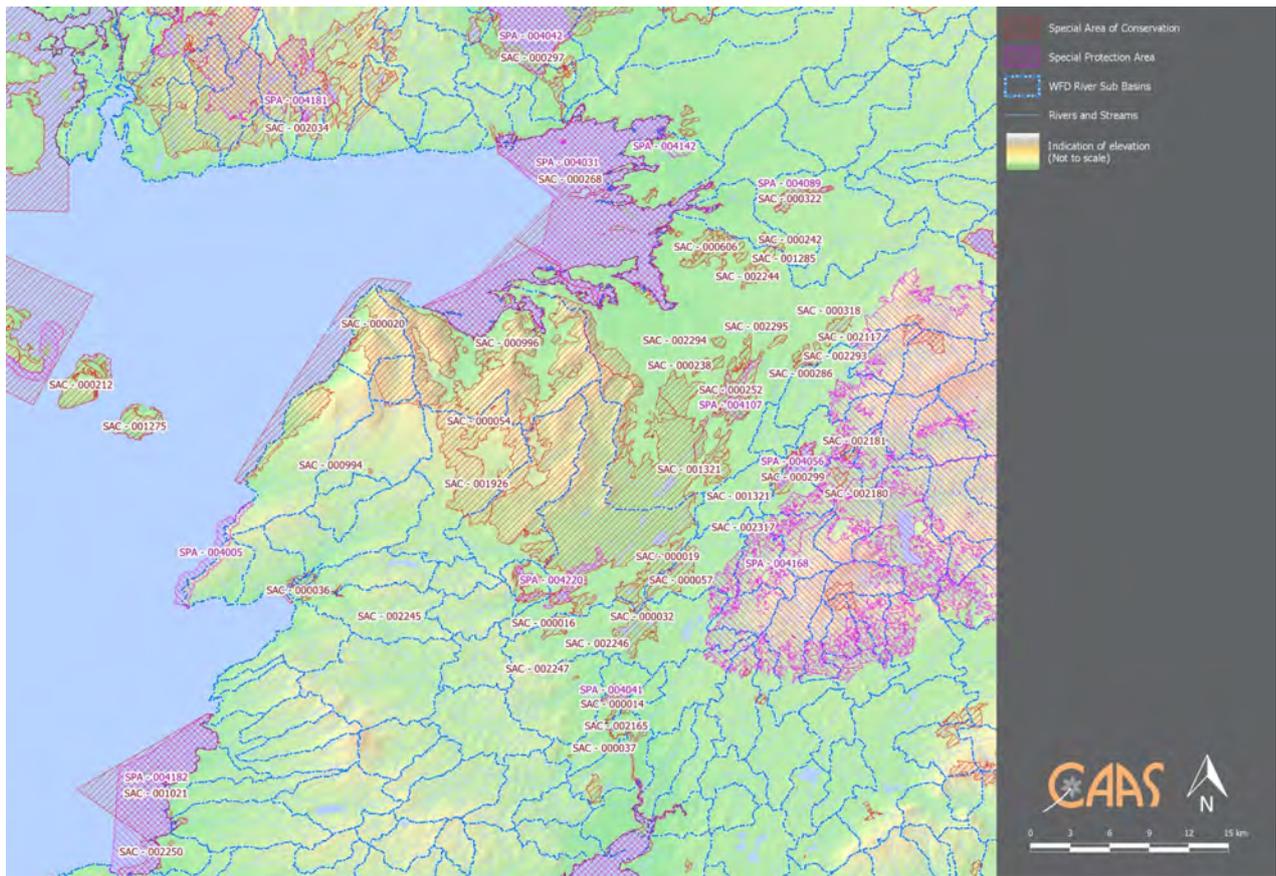


Figure 3.1 European Sites within and adjacent to the area to which the Plan relates

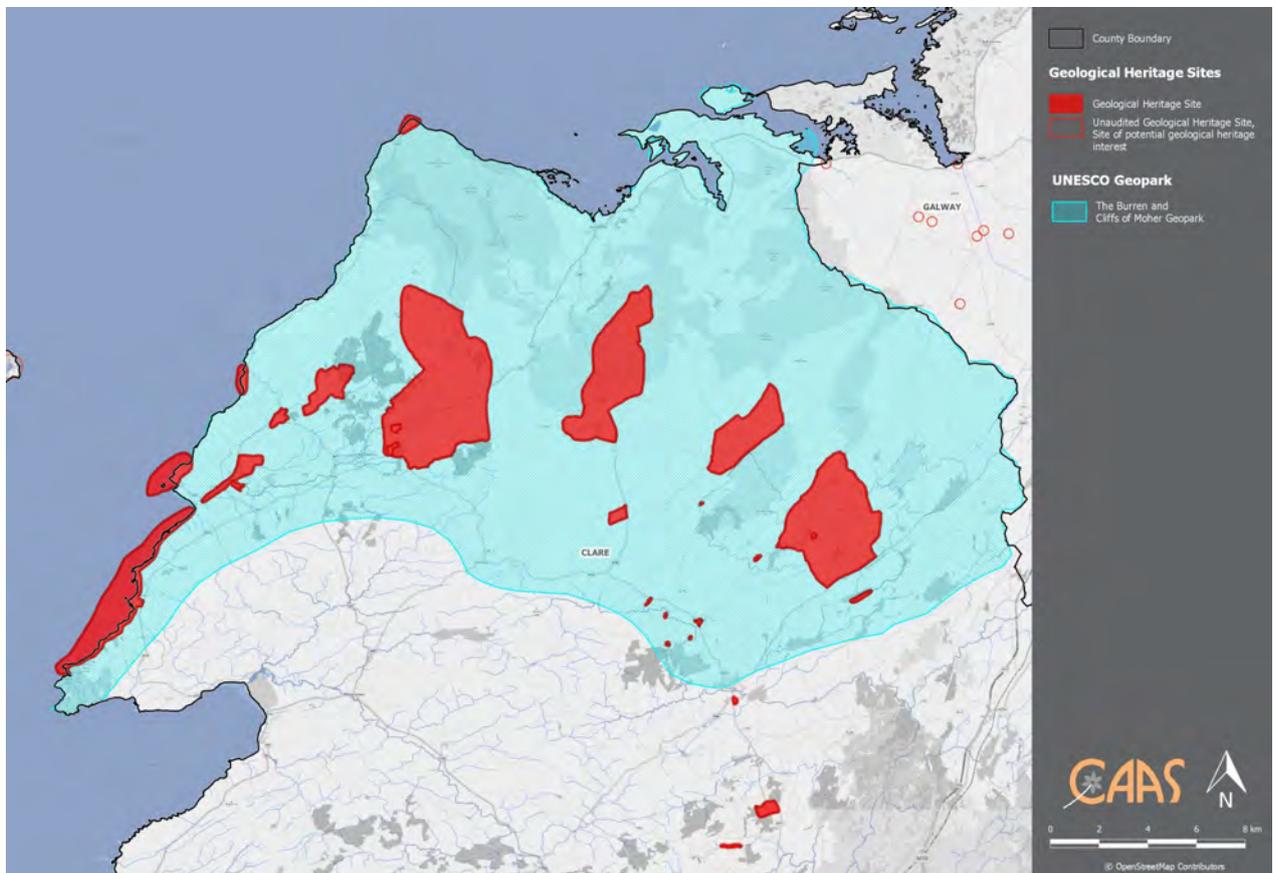


Figure 3.2 Geological Heritage

3.6 Water

Surfacewater Status

The main rivers in the area are the Fergus River, Caher River, Ailee River, Cooleen River, Kilchrest River, Moyree River, Delagh River and Gleninagh South River. The surface water from the area to which the Plan relates drains into three catchments (shown on Figure 3.3): Mal Bay to the west of the area; Shannon Estuary North to the east; and Galway Bay South East to the north. Rivers and their tributaries are generally identified as being of *good* (Caher, upstream Fergus, Delagh, Kilmore North) or *moderate* (Aille, Cooleen, Moyree, downstream Fergus) status. However, the rivers Clooneen, Ballymacravan and upstream Aille are identified as being of *poor* status. Lakes are mostly identified as being of *high* (Muckanagh) and *good* (Cullaun, Bunny, Dromore) status. However, lakes Inchiquin and Atedaun are identified as being of *moderate* status and lake Licken (in the south of the Burren and Cliffs of Moher area) is identified as being of *bad* status. In addition, there are a number of *unassigned*⁷ rivers and lakes across the Burren and Cliffs of Moher area. There are number of significant pressures affecting status of the rivers and lakes in the Burren and Cliffs of Moher area, with agriculture being the most dominant.⁸ The status of coastal waters adjacent to the Burren and Cliffs of Moher to the west is currently *unassigned*, while the status of the coastal waters in Outer Galway Bay to the north-west of the area is identified as *high*. Transitional waters in Kinavarra Bay are identified as *moderate*. The WFD surface water status (2010-2015) of rivers, lakes, coastal and transitional waters, within and surrounding the area to which the Plan relates is shown on Figure 3.3 overleaf.

Groundwater Status

The WFD status (2010-2015) of all groundwater underlying the area to which the Plan relates is identified as being of *good status*, meeting the objectives of the WFD. There is an area of *poor* groundwater status located to the west of the Burren area at Caherglassaun Turlough.

Aquifer Vulnerability and Productivity

The Burren area is underlain by a regionally important karstified bedrock aquifer, while the Cliffs of Moher area is underlain by locally important bedrock aquifer (moderately productive only in local zones). The aquifers underlying most the Plan area are generally classified as being of *high vulnerability* and *extreme vulnerability* and *rock at or near surface or Karst*.

Bathing Waters

The most recent available data from the EPA⁹ shows that all bathing waters within the Burren and Cliffs of Moher reported on are of *excellent* water quality. The Burren and Cliffs of Moher bathing locations at Lahinch and Fanore were awarded with the Blue Flag in 2019.

Flooding

Certain areas across the Burren and Cliffs of Moher area are at risk from coastal, fluvial and groundwater flooding. Historical flooding is documented at locations including at Doolin, Lahinch, Killeany, Muckinish Lough, Kinvarra, Knocknagroach and Ballyvaughan.

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).

⁷ 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.

⁸ Other significant pressures include: domestic waste water, forestry, hydromorphology and diffuse urban.

⁹ EPA Report on *Bathing Water Quality in Ireland 2018*

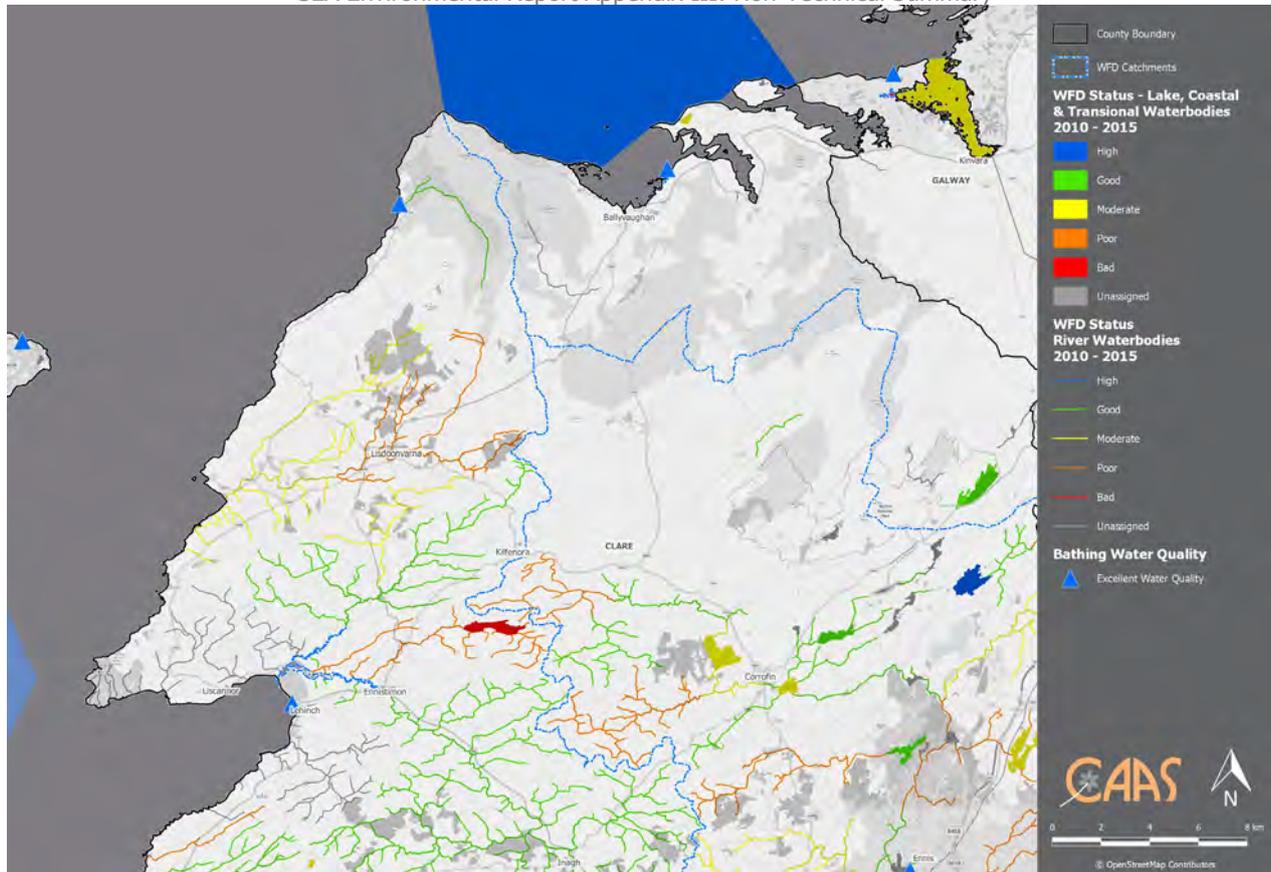


Figure 3.3 Surface Water Status (2010-2015)

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). Ireland's National Policy position is to reduce CO₂ emissions in 2050 by 80% on 1990 levels across the Energy Generation, Built Environment and Transport sectors, with a goal of Climate neutrality in the Agriculture and Land-Use sector. The 2016 emissions for all of these sectors are rising, making achievement of long-term goals more difficult.

The National Mitigation Plan (Department of Communications, Climate Action and Environment, 2017), represents an initial step to set Ireland on a pathway to achieve the level of decarbonisation required. It is a whole-of-Government Plan, reflecting in particular the central roles of the key Ministers responsible for the sectors covered by the Plan – Electricity Generation, the Built Environment, Transport and Agriculture, as well as drawing on the perspectives and responsibilities of a range of other Government Departments. The National Adaptation Framework (Department of Communications, Climate Action and Environment, 2018), sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. The National Adaptation Framework outlines a whole of government and society approach to climate adaptation. Under the Framework, a number of Government Departments will be required to prepare sectoral adaptation plans in relation to a priority area that they are responsible for.

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 current¹⁰ air quality in the Rural West Air Quality Region is identified by the EPA as being *good*.

3.8 Material Assets

Waste Water

There are nine urban areas in County Clare and ten urban areas in County Galway listed currently as priority areas where improvements are required to resolve urgent environmental issues.

¹⁰ 27/08/2019 (<http://www.epa.ie/air/quality/>)
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The area to which the Plan relates is served by a number of Urban Waste Water Treatment Plants located at: Lisdoonvarna, Ballyvaughan, Kinavara, Corofin, Ennistymon, Lahinch and Liscannor. The most recent EPA reports on Waste Water Discharge Licence Audits show that most of these facilities have satisfactory operational and environmental performance and are in compliance with the discharge licence limit values.

Some of the Waste Water Treatment Plants serving the area to which the Plan relates (at Ballyvaughan, Lahinch and Liscannor) are currently listed as priority areas, where improvements are required to resolve urgent environmental issues. Settlements and rural areas across the Burren and Cliffs of Moher are served by a combined sewer network, including septic tanks and sewerage treatment schemes serving agglomerations under 500 P.E.

Since 2015, Irish Water, working in partnership with Clare County Council and Galway County Council, to upgrade the waste water treatment plants. There are number of projects currently planned to be undertaken including at the priority areas of Ballyvaughan and Liscannor. Capacity improvements will help to support new development in these areas, including tourism related development.

Water Supply

Drinking water supply in the area to which the Plan relates is provided by domestic water wells and private/public water supply schemes. The most recent EPA Remedial Action List (Q2 of 2019) identifies three drinking water supplies in County Clare that supply the area to which the Plan relates: West Clare RWS with high levels of Trihalomethanes, which are a by-product of the disinfection process; and two with treatments and management issues identified by the EPA.

Public Assets and Infrastructure

Settlements within the Burren and Cliffs of Moher area include Ennistymon and Lahinch, which are designated by the Clare County Development Plan as service towns (large settlements that provide a range of services to the towns, villages and rural areas in their catchments). Shannon International Airport (located to the south of the Burren and Cliffs of Moher area) is a key hub both for national and international air travel. The Wild Atlantic Way touring route traverses coastal areas along the west of the Plan area.

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 Waste Region comprises the 10 local authority areas of Carlow, Clare, Cork County, Cork City, Limerick City and County, Kerry, Kilkenny, Tipperary, Waterford City and County and Wexford. The Plan provides a framework for the prevention and management of waste in a sustainable manner.

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.

Some parts of the Burren have remained relatively unchanged since the impact of the first farmers some 6,000 years ago. Many of archaeological sites in the Burren area are of international importance, with 300 of recorded Fulacht Fiadh (early cooking places) and 450 ring forts¹¹.

The Burren area contains 80 wedge tombs and represents the densest concentration of this type of megalithic tomb in Ireland. Poul nabrone Dolmen (located south of Ballyvaughan), a portal tomb from the Neolithic period situated on bare upland limestone, is one of Ireland's most important archaeological monuments, designated a National Monument in State Care. These monuments are mapped on Figure 3.4.

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

¹¹ Clare County Council (<https://www.clarecoco.ie/services/planning/architectural-conservation/archaeology/>)
CAAS for Fáilte Ireland

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. Clusters of architectural heritage across the Burren and Cliffs of Moher area are concentrated within already developed villages, urban and suburban areas. The architectural heritage of the area includes: great stone forts and cahers (such as Caherballykinvarga, Cahercommaun, Cahermore, Caherconaille); early church sites (such as Oughtmama, Killinaboy and Kilfenora); tower houses (such as Gleninagh, Ballynalackan, Newton and Donnagore); and the Cistercian abbey of Corcomroe. Protected structures designated across the Burren and Cliffs of Moher are mapped on Figure 3.4.

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 six ACAs designated in the area of the Burren and Cliffs of Moher, as shown on: Ballyvaughan Village Centre; Ballyvaughan Auxiliary Workhouse; Corofin; Lidoonvarna; Kilfenora; and Ennistymon.

3.10 Landscape

UNESCO Global Geopark

The Burren and Cliffs of Moher area was designated a UNESCO Global Geopark in 2011. The geological landscape of the Burren and Cliffs of Moher is one of glacially smoothed Carboniferous fossil-rich limestone hills; dramatic sea cliffs; seasonal lakes; and vast networks of subterranean caves. This physical landscape hosts rare natural habitats and unique floral assemblages not found anywhere else on Earth, as well as abundant legacies of human settlement dating back over 6,000 years.

Topography

The Burren and Cliffs of Moher are located on the west coast of Ireland, bounded by Atlantic coastal cliffs (10 - 200 m high) to the west, the Gort lowlands to the east and by low hilly terrain to the south. Much of the land is at an elevation of 100 - 200 m above sea level; the highest point is Slieve Elva at 344 m.

Wild Atlantic Way

The Wild Atlantic Way touring route traverses coastal areas along the west of the Plan area and the Cliffs of Moher is one of seventeen 'Signature Discovery Points'¹² on this route.

Landscape Character Assessment

Most of the area to which the Plan relates is situated within County Clare. A smaller area that includes the town of Kinvarra is situated in County Galway. The Landscape Character Assessment of County Clare identifies 21 Landscape Character Areas (LCAs). The area to which the Plan relates within County Clare is located across five of these areas as mapped on Figure 3.5: LCA 1: Burren Uplands; LCA 2: Low Burren; LCA 3: Cliffs of Moher and Lahinch; LCA 4: Fergus Loughlands; and LCA 15: Kilnamona High Drumlin Farmland.

There are two Heritage Landscapes designated within/partially within these LCAs, 'The Burren' and 'The Coast' – these Heritage Landscapes are mapped on Heritage Landscapes are areas, identified by the Clare County Development Plan, where natural and cultural heritage are given priority and where development is not precluded but happens more slowly and carefully. Heritage Landscapes contain significant concentrations of National Monuments. The Clare County Development Plan also identifies two types of Working Landscapes, areas with pockets of concentrated development or a unique natural resource. The area to which the Plan relates is partially located within the Western Corridor Working Landscape.

The Landscape Character Assessment of County Galway identifies 25 LCAs. The area to which the Plan relates is located across two of these areas as mapped on Figure 3.5 and listed below:

- LCA 8: Lower Burren (County Galway portion); and
- LCA 13: East Galway Bay (Oranmore to Kinvarra Bay and inland to N18 road).

The Landscape Character Assessment for County Galway also classifies landscapes according to their sensitivity (their ability to accommodate change or intervention without suffering unacceptable effects to character and values). The landscape in the area to which the Plan relates in County Galway is classified as being of 'Unique' (Lower Burren LCA) and 'High' (East Galway Bay LCA) sensitivity.

¹² Signature Discovery Points have been identified as the most scenic and high-amenity areas along the route.
CAAS for Fáilte Ireland

Protected Views and Prospects

The Clare County Development Plan identifies a number of valuable views and prospects within the Designated Scenic Routes, as shown on Figure 3.5. The Galway County Development Plan also identifies many important focal points from which views and vistas of great natural beauty may be viewed.

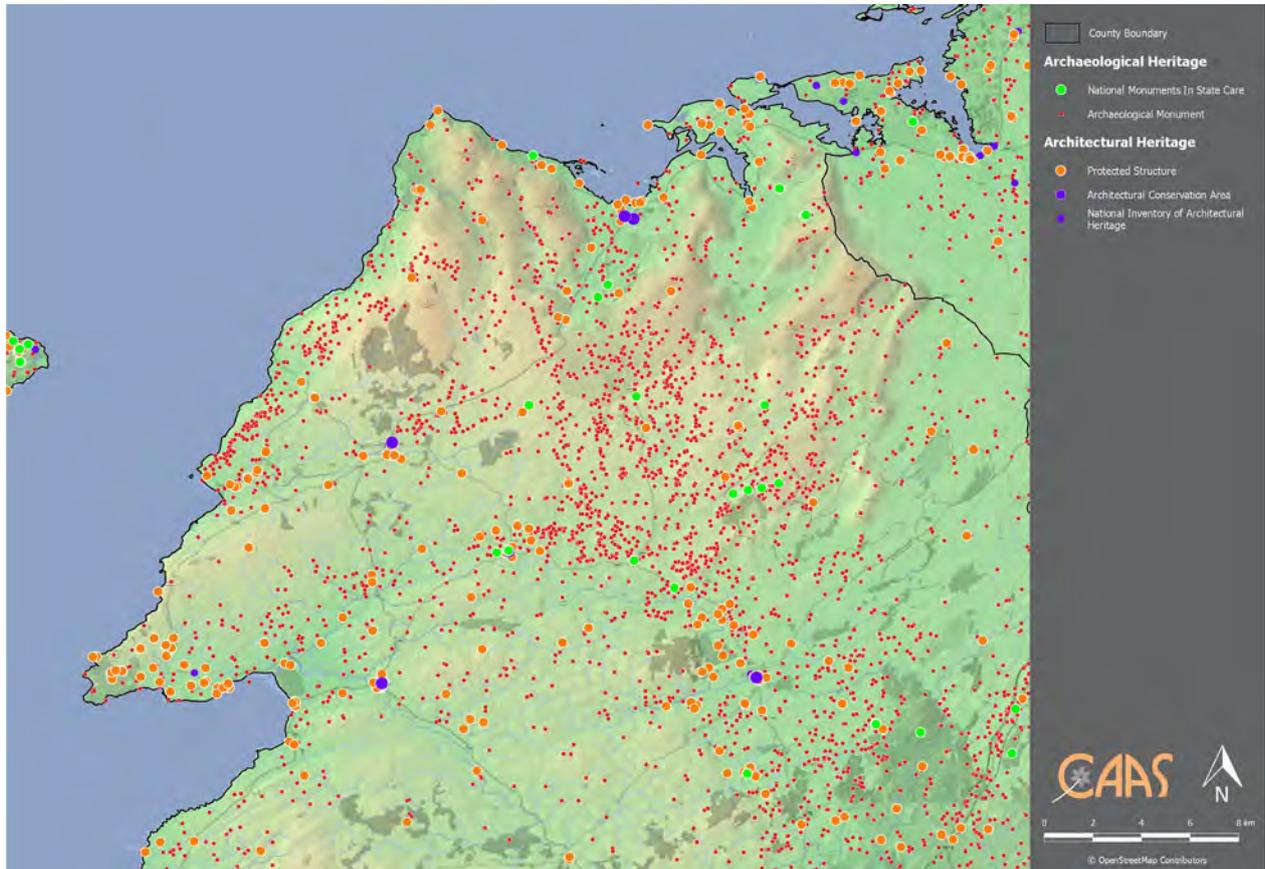


Figure 3.4 Archaeological and Architectural Heritage

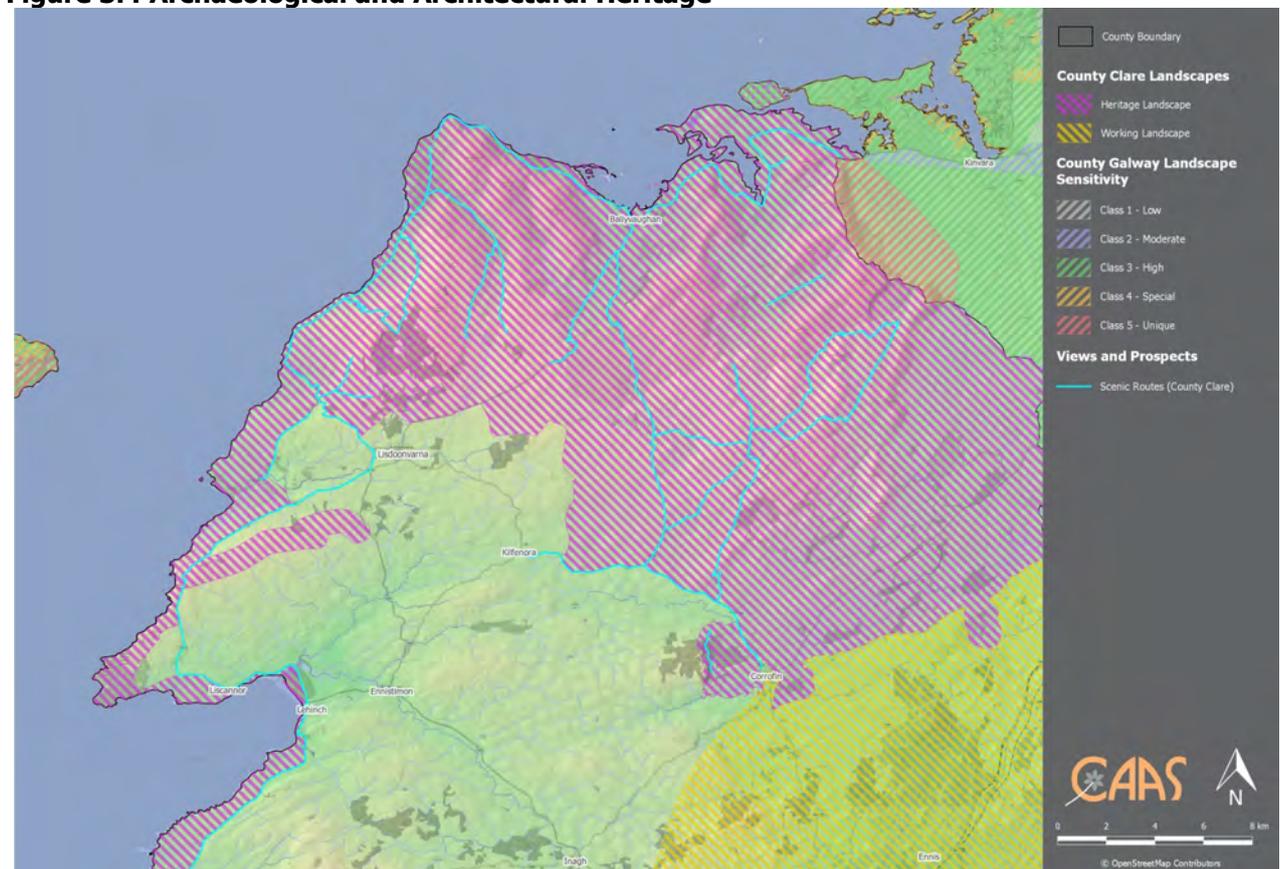


Figure 3.5 Landscape Designations

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, Indicators and Targets

Environmental Component	Strategic Environmental Objectives
Biodiversity, Flora and Fauna	BFF1: To contribute towards compliance with the Habitats and Birds Directives with regard to the protection of European Sites and Annexed habitats and species ¹³
	B2: 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
	B3: To contribute towards avoidance of significant impacts on relevant habitats, species, environmental features or other sustaining resources in designated sites including Wildlife Sites ¹⁴ 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
Population and Human Health	PHH1: To contribute towards the protection of populations and human health from exposure to incompatible landuses
Soil	S1: To minimise land take and loss to extent of soil resource
Water	W1: To contribute towards the maintenance and improvement, where possible, of the quality and status of surface waters
	W2: To contribute towards maintaining and improving, where possible, the chemical and quantitative status of groundwaters
	W3: To contribute towards compliance with the provisions of the Flood Risk Management Guidelines
Air and Climatic Factors	AC1: To contribute towards climate adaptation and mitigation
Material Assets	M1: For development to be served with adequate and appropriate critical infrastructure with sufficient capacity (drinking water, waste water, waste and transport) that does not present a danger to human health
	M2: To contribute towards the protection of public assets and infrastructure, including that relating to recreation and leisure, transport, utilities and marine areas and fisheries
	M3: To reduce waste volumes, minimise waste to landfill and increase recycling and reuse
Cultural Heritage	CH1: To contribute towards the protection of archaeological heritage including entries to the Record of Monuments and Places and/or their context
	CH2: To contribute towards the protection of architectural heritage including entries to the Records of Protected Structures and Architectural Conservation Areas and their context
Landscape	L1: To avoid conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in the land use plans of Clare and Galway County Councils

¹³ '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.

¹⁴ 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

Current Situation (Alternative 1: Business as Usual)

The Cliffs of Moher is Ireland's second top fee-paying attraction, with over 1.5 m visitors. The pace of growth in day visitation, with the accompanying visitor management concerns, and the overall low visitor spend in the area arising from the nature of visitation are the key challenges underlying this VEDP. The area is of outstanding beauty and international significance, which provides a strong basis to address the issues and realise new opportunities.

Challenges to the sustainable development of tourism in the area include:

- One of the lowest spend returns from international visitors – very large number based in for the Cliffs of Moher without further engagement in the area – over reliance on day visitors;
- Traffic management issues and visitor management concerns – high concentration of visitors and need for dispersal;
- Promotional activities limited overseas;
- Few online packages;
- Limited accommodation capacity in destination;
- Fragmented communication in region between local groups and links with Clare Tourism fragmented;
- Infrastructure and lack of visitor services; and
- Traffic concerns for cyclists – potential to undermine the experience.

This current situation presents **Alternative 1 (Business as Usual)** to be considered by the SEA. Numbers of visitors would be likely to continue to increase under this scenario – consistent with the development of tourism over many decades. The most popular locations in the Burren and Cliffs of Moher area would be likely to see the largest increases in visitors, which would occur during the peak season.

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

The challenges posed by the current situation establish a potential need for a plan that seeks to better manage tourism in the Burren and Cliffs of Moher 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.

The way forward for the Burren and Cliffs of Moher would be through partnerships, connectivity of products, development of new experiences and a focus on getting the story to the customer – inspiring them to travel off-season, stay longer and enjoy the essence of the Burren and Cliffs of Moher.

Opportunities to be considered in the preparation of such a Plan (in combination with the wider and extensive policy and wider and extensive policy and planning framework planning framework) would be:

- Introduction of a Visitor Management Plan to disperse visitors throughout the area and greater use of capacity management principles;
- Redesigning and managing the Cliffs of Moher Coastal Walk to become a walk of Global significance with managed access and extended value;
- Amplifying recognition of the Burren as an internationally significant landscape recognised by UNESCO;
- Promoting exceptional experiences relating to Burren adventure, wellness and education;

- Creating all year round visitor experiences to capture Great Escapers and winter travellers from Germany, France, UK, US, Australia and New Zealand, extending the season and sustaining employment;
- Strengthening the partnerships between local organisations and creating a stronger coordinated proactive marketing alliance;
- Improving accommodation options; and
- Creating premier niche eco-experiences.

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 likely to be a continuing increase in tourist numbers – consistent with the development of tourism over many decades. The most popular locations in the Burren and Cliffs of Moher area would be likely to see the largest increases in visitors, most of which would be likely to occur during the peak season. This would be likely to 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 of seeking 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 (and associated effects) which are provided under all alternatives, and measures relating to seasonality (all year round visitor experiences) and regionality (dispersal of visitors throughout the area, 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 Burren and Cliffs of Moher 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 2019, the National Climate Change Adaptation Framework (2018 and any subsequent versions) and the National Mitigation Plan (2017 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 (all year round visitor experiences) and regionality (dispersal of visitors throughout the area and greater use of capacity management principles) – Alternative 2A would provide this also. Seasonality and regionality provide a greater spread of tourists throughout the year and across the Burren and Cliffs of Moher area thereby reducing potential environmental effects and peak load additions on various infrastructure in particular locations/at particular times. Alternative 2B would also contribute towards the protection

and management of biodiversity and flora and fauna through a degree of visitor management, although not as much as Alternative 2A.

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 Burren and Cliffs of Moher 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 two layers of mitigation, through:

- The existing statutory planning and consent framework; and
- A degree of visitor management.

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 Improve status of SEO			Potential Conflict with status of SEOs - likely to be mitigated by complying with other measures included within the Plan		Probable Conflict with status of SEOs- unlikely to be fully mitigated
	to the Greatest degree	to Moderate degree	to a Lesser degree	to a Moderate degree	to a Greater 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 Burren and Cliffs of Moher 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 ¹⁵		
	Significant Positive Effect, likely to occur	Potential Significant Adverse Effect, if unmitigated	Residual Adverse Non-Significant Effects
Biodiversity and flora and fauna	<ul style="list-style-type: none"> 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"> Visitor management strategies; and VEDP requirements for environmental protection and management. Contributes towards the maintenance of existing green infrastructure and its ecosystem services. Contribution towards protection of biodiversity and flora and fauna as a result of contributing towards the protection of environmental vectors, air, water and soil. 	<p>Arising from both construction and operation of tourism related development/activities:</p> <ul style="list-style-type: none"> 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; Habitat loss, fragmentation and deterioration, including patch size and edge effects; and Disturbance (e.g. due to noise and lighting along transport corridors) and displacement of protected species such as birds and bats. 	<ul style="list-style-type: none"> 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. 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)
Population and human health	<ul style="list-style-type: none"> Contribution towards the protection of human health including through VEDP requirements for environmental protection and management. 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, waste water, waste and transport) have been identified. Contribution towards the protection amenity usage and access. Contribution towards the sustainable growth of tourism and associated sustenance and growth of communities in the Burren and Cliffs of Moher area. 	<ul style="list-style-type: none"> Potential interactions if effects upon environmental vectors such as water are not mitigated. Potential interactions if additional tourists are directed towards specific locations in instances where significant problems with critical infrastructure (drinking water, waste water, waste and transport) have been identified. 	<ul style="list-style-type: none"> 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.
Soil	<ul style="list-style-type: none"> 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 Contribution towards the protection of the environment from contamination. Contributes towards protection of designated sites of geological heritage. 	<ul style="list-style-type: none"> Adverse impacts upon the hydrogeological and ecological function of the soil resource. Adverse effects on designated geological heritage sites. Potential for increase in coastal /river bank erosion. 	<ul style="list-style-type: none"> Loss of an extent of soil function arising from the replacement of semi-natural land covers with artificial surfaces and from sea level rise/coastal erosion.

¹⁵ 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 the main SEA Environmental Report.

Environmental Component	Environmental Effects, in combination with the existing statutory planning/decision-making and consent-granting framework ¹⁵		
	Significant Positive Effect, likely to occur	Potential Significant Adverse Effect, if unmitigated	Residual Adverse Non-Significant Effects
Water	<ul style="list-style-type: none"> Contribution towards the protection of water resources (including the status of surface and groundwaters), bathing water quality and water based designations including through integrating requirements for environmental protection and management into the Plan. Contribution towards flood risk management and appropriate drainage. 	<ul style="list-style-type: none"> 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. Increase in flood risk. 	<ul style="list-style-type: none"> Increased loadings as a result of development to comply with River Basin Management Plan. 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.
Air and climatic factors	<ul style="list-style-type: none"> Contribution towards climate adaptation and mitigation through measures relating to: <ul style="list-style-type: none"> Walking and cycling; The provision of charging infrastructure; 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. 	<ul style="list-style-type: none"> 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. Potential conflicts between transport movements, including car movements, and air quality. 	<ul style="list-style-type: none"> 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. Risks remain due to uncertainty with regard to climate and interactions with issues including flooding and material assets.
Material Assets	<ul style="list-style-type: none"> Contributes towards protection and allows for continued use of public assets and infrastructure. 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. 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, waste water, waste and transport) have been identified. Contribution towards compliance with national and regional water services and waste management policies. 	<ul style="list-style-type: none"> Increased number of visitors have the potential to increase traffic levels. The need to provide adequate and appropriate water services (it is the function of Irish Water to provide for such needs). Increases in waste levels and residual wastes from visitors and construction of developments. Potential impacts upon public assets and infrastructure. 	<ul style="list-style-type: none"> Residual wastes to be disposed of in line with higher level waste management policies. Increased loading on critical infrastructure (drinking water, waste water, waste and transport) where no significant problems have been identified with this infrastructure. 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. Any impacts upon public assets and infrastructure to comply with statutory planning/consent-granting framework.
Cultural Heritage	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> Potential effects on designated and unknown archaeological heritage. Potential effects on architectural heritage. 	<ul style="list-style-type: none"> Potential alteration to the context and setting of architectural heritage however, these will occur in compliance with legislation. Potential alteration to the context and setting of archaeological heritage however, this will occur in compliance with legislation. Potential loss of unknown archaeology however, this loss will be mitigated by measures integrated into the Plan.
Landscape	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> 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. Changes in the appearance of the landscape. 	<ul style="list-style-type: none"> Residual visual effects (these would comply with landscape designation provisions).

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 Plan¹⁶, 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; and
- Integrating Requirements for Environmental Compliance into the Plan.

The SEA and AA team worked with the Plan-preparation team at Fáilte Ireland in order to integrate requirements for environmental protection and management into the Plan.

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 compliance¹⁷ 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 VEDP (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 VEDP 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;
- The Clare and Galway County Development Plans, including various provisions relating to sustainable development, environmental protection and environmental management; and
- The Climate Action Plan 2019, the National Climate Change Adaptation Framework (2018 and any subsequent versions) and the National Mitigation Plan (2017 and any subsequent versions).

¹⁶ All recommendations made by the SEA and AA processes have been integrated into the Plan.

¹⁷ Demonstration of compliance may be supported by monitoring undertaken by the beneficiary.

Further measures relating to infrastructure capacity, visitor management, 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 Burren and Cliffs of Moher VEDP area¹⁸ in order to monitor any effects of visitors;
- Sources maintained by Clare and Galway County Councils (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 VEDP 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.

Environmental monitoring for the VEDP 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.

¹⁸ This sub-programme will include locations along the Burren Discovery Trail.
CAAS for Fáilte Ireland

Table 6.1 Selected Indicators, Targets and Monitoring Sources

Environmental Component	Indicators	Targets	Source and (where available) Frequency
Biodiversity, Flora and Fauna	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 ¹⁹	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" – see summary provided under Section 6.1 • Lower tier environmental assessment and decision making by local authorities • SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) • Department of Culture, Heritage and the Gaeltacht report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every 6 years) • Department of Culture, Heritage and the Gaeltacht's National Monitoring Report for the Birds Directive under Article 12 (every 3 years) • Consultations with the NPWS • CORINE mapping resurvey (every c. 5 years) • Input from any other existing or replacement Fáilte Ireland monitoring programmes
	B2: Percentage loss of functional connectivity without remediation resulting from 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	
Population and Human Health	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"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" – see summary provided under Section 6.1 • Lower tier environmental assessment and decision making by local authorities • SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) • Consultations with the HSE and EPA • Input from any other existing or replacement Fáilte Ireland monitoring programmes
Soil	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"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" – see summary provided under Section 6.1 • Lower tier environmental assessment and decision making by local authorities • SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) • CORINE mapping resurvey (every c. 5 years) • Input from any other existing or replacement Fáilte Ireland monitoring programmes

¹⁹ 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
Water	<p>W1i: Classification of Overall Status (comprised of ecological and chemical status) under the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (SI No. 272 of 2009)</p> <p>W1ii: Mandatory and Guide values as set by the EU Bathing Water Directive and transposing Bathing Water Quality Regulations (SI No. 79 of 2008)</p> <p>W2: Interactions with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC resulting from development adhering to the Plan</p> <p>W3: Compliance of relevant lower tier assessments and decision making with the Flood Risk Management Guidelines</p>	<p>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</p> <p>W1ii: No deterioration in the value of bathing waters or adverse effect upon the ability of any bathing water to achieve Mandatory values and, where possible, Guide values as a result of the Plan</p> <p>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</p> <p>W3: For lower tier assessments and decision making to comply with the Flood Risk Management Guidelines</p>	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" – see summary provided under Section 6.1 • Lower tier environmental assessment and decision making by local authorities • Data issued under the Water Framework Directive Monitoring Programme for Ireland (multi-annual) • EPA <i>The Quality of Bathing Water in Ireland</i> reports • SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) • Input from any other existing or replacement Fáilte Ireland monitoring programmes
Air and Climatic Factors	<p>AC1: Demonstration of compliance with provisions relating to climate adaptation and mitigation have been integrated into the Plan.</p>	<p>C1: To maximise the amount of measures relating to climate adaptation and mitigation being implemented</p>	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" – see summary provided under Section 6.1 • Lower tier environmental assessment and decision making by local authorities • SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) • Input from any other existing or replacement Fáilte Ireland monitoring programmes
Material Assets	<p>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</p> <p>M2: Number of significant adverse effects on the use of or access to public assets and infrastructure</p> <p>M3: Preparation and implementation of construction and environmental management plans</p>	<p>M1: No instances whereby additional tourists are directed by beneficiaries of funding towards specific locations in instances where significant problems with critical infrastructure have been identified (drinking water, wastewater, waste, transport), by stakeholders such as the EPA, Irish Water, Clare County Council and/or Galway County Council.</p> <p>M2: No significant adverse effects on the use of or access to public assets and infrastructure</p> <p>M3: For construction and environmental management plans to be prepared and implemented for relevant projects</p>	<ul style="list-style-type: none"> • Documentation demonstrating compliance with "Requirements for Environmental Protection and Management" – see summary provided under Section 6.1 • Lower tier environmental assessment and decision making by local authorities • SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) • Consultations with the partners such as the EPA, Irish Water, Clare County Council and/or Galway County Council • Input from any other existing or replacement Fáilte Ireland monitoring programmes

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Environmental Component	Indicators	Targets	Source and (where available) Frequency
Cultural Heritage	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"> • Documentation demonstrating compliance with “Requirements for Environmental Protection and Management” – see summary provided under Section 6.1 • Lower tier environmental assessment and decision making by local authorities • SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) • Input from any other existing or replacement Fáilte Ireland monitoring programmes
	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	<ul style="list-style-type: none"> • Documentation demonstrating compliance with “Requirements for Environmental Protection and Management” – see summary provided under Section 6.1 • Lower tier environmental assessment and decision making by local authorities • SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) • Input from any other existing or replacement Fáilte Ireland monitoring programmes
Landscape	L1: Number of unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in the land use plans of Clare and Galway County Councils	L1: No unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in the land use plans of Clare and Galway County Councils	<ul style="list-style-type: none"> • Documentation demonstrating compliance with “Requirements for Environmental Protection and Management” – see summary provided under Section 6.1 • Lower tier environmental assessment and decision making by local authorities • SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies) • Input from any other existing or replacement Fáilte Ireland monitoring programmes