

APPROPRIATE ASSESSMENT

CONCLUSION STATEMENT

FOR THE

INISHOWEN PENINSULA DESTINATION EXPERIENCE DEVELOPMENT PLAN

for: **Fáilte Ireland**
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Section 1 Introduction and Background

1.1 Introduction

This is the Appropriate Assessment (AA) Conclusion Statement for the Inishowen Peninsula Destination Experience Development Plan. The obligation to undertake AA derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC as transposed into Irish legislation by, inter alia, the European Communities (Birds and Natural Habitats) Regulations 2011, as amended. AA is a focused and detailed impact assessment of the implications of a strategic action (such as a plan or programme) or project, alone and in combination with other strategic actions and projects, on the integrity of any European site in view of its conservation objectives. This AA Conclusion Statement should be read in conjunction with the Plan and associated documents including the AA Natura Impact Statement (NIS).

1.2 Legislative Requirements in relation to AA

In carrying out the AA for the Plan, Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), as amended, requires, inter alia, that Fáilte Ireland considers the matters arrayed in the first column on Table 1.1 below. The second column identifies how these issues have been addressed.

Table 1.1 Matters taken into account by the AA

Matter specified by the Regulations	How addressed by AA
(a) the Natura Impact Statement	An AA NIS accompanies this AA Conclusion Statement and the Plan
(b) any other plans or projects that may, in combination with the plan or project under consideration, adversely affect the integrity of a European Site	Throughout the AA NIS, particularly Sections 3.4, 4 and 6 and Appendix II of the NIS.
(c) any supplemental information furnished in relation to any such report or statement	This AA Conclusion Statement supplements the NIS that provides additional detail on European Sites.
(d) if appropriate, any additional information sought by the authority and furnished by the applicant in relation to a Natura Impact Report	Submissions made during the Plan preparation/AA process that was relevant to the AA. The AA process has taken into account these submissions – see Section 2 of this Statement.
(e) any information or advice obtained by the public authority	
(f) if appropriate, any written submissions or observations made to the public authority in relation to the application for consent for proposed plan or project	
(g) any other relevant information	

In addition to the above, the Regulations require that Fáilte Ireland makes available for inspection a determination regarding the outcome of the assessment with respect to whether or not the Plan would adversely affect the integrity of a European site (a copy of this determination is provided at Section 4).

1.3 AA Conclusion Statement

Non-Statutory AA guidance (Department of Environment, Heritage and Local Government, 2009) states that (Section 4.14) it *"is recommended that planning authorities include a clear and discrete AA Conclusion Statement as a distinct section in the written statement of the plan separate to the SEA statement."* This guidance recommends that the following issues are addressed by the AA Conclusion Statement:

- Summary of how the findings of the AA were factored into the Plan (see Section 2);
- Reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered as part of the AA process (see Section 3);
- A declaration that the Plan as adopted will not have an adverse effect on the integrity of European sites (provided at Section 4); and
- The NIS (the AA NIS is accompanied by this AA Conclusion Statement and has informed the AA Determination – see Section 4).

As recommended, this AA Conclusion Statement addresses the above issues.

Section 2 How the findings of the AA were factored 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 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).

In order to be realised, projects included in the Inishowen Peninsula 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 Inishowen Peninsula DEDP is not part and does not contribute towards. Such legislation, policies, plans and programmes include:

- Requirements for lower-tier environmental assessment, including EIA and AA;
- Statutory land use plans that form part of the statutory decision-making and consent-granting framework (e.g. Development Plans, such as the existing Donegal County Development Plan 2018-2024 (as varied and Seven Strategic Towns Local Area Plan 2018-2024) that have undergone environmental assessment, as appropriate, including various provisions relating to sustainable development, environmental protection and environmental management²; and
- The Climate Action Plan 2021 and the National Climate Change Adaptation Framework (2018 and any subsequent versions)³.

Infrastructure Capacity⁴

With respect to infrastructural capacity (including drinking water, wastewater, waste and transport) the potential impact on existing infrastructure as well as the potential environmental effects of a likely increase in tourism-related traffic volumes along any routes resulting from the relevant initiative shall be considered and mitigated as appropriate, where relevant. This consideration and associated mitigation shall take into account the need to provide for climate resilience. The promotion of developing visitor-friendly infrastructure where it is required will also be encouraged.

Visitor Management⁵

Those receiving funding shall seek to manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant effects including loss of habitat and disturbance, including ensuring that new projects are a suitable distance from ecological sensitivities. This will include the preparation of Visitor Management Plans, including for Catalyst Projects, where relevant.

¹ Demonstration of compliance may be supported by monitoring undertaken by the beneficiary.

² For more information please refer to Appendix II of this report or the website of the relevant public authority.

³ For more information please refer to Section 4.10 and/or Appendix II of this report or the website of the relevant public authority.

⁴ This requirement has arisen through the SEA and/or AA processes.

⁵ This requirement has arisen through the SEA and/or AA processes.

Extensive research by Fáilte Ireland has shown improved environmental outcomes (including improved attainment of conservation objectives) in areas with visitor management strategies. Where available, this research will continue to be used as part of a feedback loop to inform ongoing review of Fáilte Ireland activities, including within the Inishowen Peninsula DEDP area.

Visitor management strategies will be required for proposed plans, programmes and projects that are to receive funding as relevant and appropriate.

Green Infrastructure and Ecosystem Services⁶

Those receiving funding shall contribute towards the maintenance of existing green infrastructure and its ecosystem services, taking into account the output of the Mapping and Assessment of Ecosystem Services project being undertaken by the NPWS. Proposals for the development of any green infrastructure should demonstrate the synergies that can be achieved with regard to the: provision of open space amenities; sustainable management of water; protection and management of biodiversity; protection of cultural heritage; and protection of protected landscape sensitivities.

Climate Change

Various provisions relating to climate change 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 mitigation and adaptation**, taking into account a wide range of detailed measures including those relating to resilience.

These measures have been integrated into the Plan under **FI Strategic Pillar 'Reducing Carbon Footprint'**, including:

- *Action 1.5: "Work with partners to develop **safe active travel options, and public transportation** particularly from Bunrana to Fort Dunree, **that will assist in reducing car travel.**"*
- *Action 2.1: "[...] Develop the proposed one-way shuttle service with a series of hop on, hop-off stops at sites of interest and business outlets **to assist in dispersing the visitor and reducing vehicular traffic** [...] Continue to assess the road network in relation to **cycling opportunities** [...]."*
- *Action 3.5: "[...] **encourage the improvement of cycling infrastructure** within hub communities, particularly Bunrana and Carndonagh [...]."*
- *Action 16.3: "[...] **Work towards minimising the environmental impact of public transportation through electrification of buses or the use of alternative fuels, and ensure adequate electrical charging points for private vehicles** [...]."*
- *Action 23.8: "Promote the Inishowen Uplands European Innovation Partnership project which is a new initiative that is looking at **sustainable farming practices** in the uplands [...] a range of **sustainable measures** designed to enhance productivity while **lowering carbon emissions and improving biodiversity and water quality** [...] Develop a customised extended stay itinerary that looks at other aspects of **sustainability and ecotourism on the peninsula** [...]."*

⁶ This requirement has arisen through the SEA and/or AA processes.

Section 3 Consideration of Alternatives

3.1 Description of Alternatives

Current Situation (Alternative 1: Business as Usual)

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

- Ireland's most northerly point.
- Strong thematic story of time.
- Diversity of coastlines – from the wildness of Malin Head to estuaries and Blue Flag sandy beaches.
- Biodiversity – rich marine wildlife, and migratory and resident birdlife.
- Heritage of early Christianity.
- Diverse maritime and military heritage – strong physical assets – Grianán of Aileach, O'Doherty, castles, Fort Dunree, Malin Head, wealth of ship wrecks.
- Exceptional stories associated with the peninsula's creative heritage.
- Experiences and stories that highlight resilience: Famine Village, emigration story.
- New successful product and internationally acclaimed golf.
- Strong contemporary artisan sector.
- Significant strengths in music.
- Amazing Grace story.
- Land and marine-based hard and soft adventure.
- Community festivals.
- Growing culinary strengths.

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

- High level of seasonality and low length of stay.
- Low dwell time at key attractions.
- Peninsula is too easy to pass by.
- Weak linkages between agencies.
- Fragmented offering – appears to lack critical mass and cohesion – lack of coordination.
- Arts and craft sector lacks a clear market identity.
- Large number of local efforts that have limited visibility as tourism products.
- Weak domestic market prior to COVID-19.
- Examples of tired product and interpretive signage.
- Challenges with potential trails development.
- Concern over growing congestion at Malin Head.
- Weak evening economy.
- Lower international ratings on visual appearance and things to do.
- Low awareness of value of tourism.

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

- People, Place and Policy: Growing Tourism to 2025 Department of Transport, Tourism and Sport
- Tourism Development and Innovation – A Strategy for Investment 2016-2022, Fáilte Ireland
- Wild Atlantic Way Operational Programme 2015-2019, Fáilte Ireland
- Donegal County Development Plan 2018-2024 (as varied)
- Seven Strategic Towns LAP 2018-2024

This current situation presents **Alternative 1 (Business as Usual)** to be considered by the SEA. Overtime, the 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 Inishowen Peninsula 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:

- Position Inishowen as a 'must do' destination and motivate visitors to stay overnight and spend more;
- Extend the length of the season;
- Improve the overall economy of communities through strengthening individual businesses, creating new entrepreneurial opportunities, sustaining and increasing job creation, and increasing the attractiveness of the area for other forms of economic growth;
- Align to the Wild Atlantic Way brand and target markets;
- Support community values and aspirations, and strengthen community appreciation of local culture and intangible heritage;
- Support sense of place enhancement;
- Promote collaboration and partnership, support engagement of businesses, and build lasting links between national and regional partners, local agencies and associations, and local tourism experiences; and
- Protect the natural heritage and special environmental character of the region.

Fáilte Ireland will track progress through a series of performance indicators that will be monitored annually. The existence of compelling and saleable visitor experiences is the vehicle for:

- Increase bed-nights by 2% year over year ahead of national average from year 3 of implementation of this Destination and Experience Development Plan.
- Increase revenue to attractions by 2% ahead of the national average from implementation.
- Increase length of stay.
- Increase in the saleable product (5 new saleable experiences), improved experiences and better distribution.
- Season extension: extend opening hours annually by 5% annually.
- Increased visitor satisfaction – benchmarked through measures such as Net Promoter Score.

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.

3.2 Detailed Consideration of Alternatives

Alternative 1: Business as Usual

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

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

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

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

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

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

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

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

Although a Plan would help to improve the seasonal and geographic spread of visitors, a Plan's objective would be to increase the number of visitors to the Inishowen Peninsula area. Although this would be likely to happen without a Plan, a Plan would have the potential to increase numbers of tourists – and associated potential adverse effects – to a greater degree than would be the case if there was no Plan. This would be likely to contribute towards an increase in travel-related greenhouse gas and other emissions to air, including from aviation. These increases will be mitigated by provisions that have been integrated into the Plan, including those relating to sustainable mobility and compliance with the Climate Action Plan 2021, the National Climate Change Adaptation Framework (2018 and any subsequent versions).

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

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

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

In addition to the measures relating to sustainable development, environmental management and environmental protection, which are provided under all alternatives, this Alternative (2B) would provide measures to improve seasonality and regionality. Seasonality and regionality would provide a greater spread of tourists throughout the year and across the Inishowen Peninsula 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 Inishowen Peninsula 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 3.1 below provides a comparative evaluation of alternatives against SEOs.

Table 3.1 Comparative Evaluation of Alternatives against SEOs

	Likely to Improve status of SEOs			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 a 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		✓			✓	

3.3 Selected Alternative for the Plan

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

Section 4 AA Determination

**Appropriate Assessment Determination under the
European Communities (Birds and Natural Habitats) Regulations, 2011 (as amended)
for the
Inishowen Peninsula Destination Experience Development Plan (DEDP)**

An Appropriate Assessment (AA) Determination, pursuant to Article 6(3) of the Habitats Directive, as to whether a plan or project would adversely affect the integrity of a European site, and Regulation 42 (11) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), is being made by Fáilte Ireland.

In carrying out this AA, Fáilte Ireland is taking into account the relevant matters specified under Regulation 42 (12) of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended). The AA Natura Impact Statement (which considers other plans and projects) has been carefully considered and its reasoning and conclusion agreed with and adopted. All other documents prepared and submitted during the preparation process for the Inishowen Peninsula DEDP were also considered in making this determination, including the Plan to be finalised and written submissions made on the Draft Plan and associated documents while they were on public display.

It is determined that the risks to the safeguarding and integrity of the qualifying interests and conservation objectives of the Natura 2000 network have been addressed by the inclusion of achievable mitigation measures that will prioritise the avoidance of impacts in the first place and reliably mitigate these impacts where they cannot be avoided. Furthermore, in order to be realised, projects included in the Plan will have to comply, as relevant, with the various provisions of legislation, policies, plans and programmes (including requirements for lower-tier AA) that form the statutory decision-making and consent-granting framework, of which the Plan is not part and does not contribute towards.

Having incorporated these mitigation commitments, it is determined that implementation of the Inishowen Peninsula DEDP will not have a significant adverse effect on the ecological integrity of any European site, either individually or in combination with any other plan or project¹. Therefore, no further assessment is required.

Date: 27.10.21

Signed:  _____
Signatory Approved Officer

¹ 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 plan to proceed; and
c) Adequate compensatory measures in place.