

**SEA STATEMENT**

***Visitor Experience & Management Masterplan for Glendalough  
and Wicklow Mountains National Park***

**STRATEGIC ENVIRONMENTAL ASSESSMENT**

**Prepared for Fáilte Ireland**

**2023**



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## 1.0 Introduction

- 1.1. This is the Strategic Environmental Assessment (SEA) Statement for the *Visitor Experience and Management Masterplan (VEMMP) for Glendalough and Wicklow Mountains National Park*. The competent authority for completion of the Strategic Environmental Assessment and adoption of the VEMMP is Fáilte Ireland.
- 1.2. The *Visitor Experience and Management Masterplan (VEMMP) for Glendalough and Wicklow Mountains National Park* is a non-statutory, medium range plan (up to ten years) intended to provide for the visitor experience within the setting of Glendalough and the Wicklow Mountains National Park, whilst protecting the heritage of the area, built and natural. It includes establishment of key objectives to support local communities, against which future projects will be assessed. It is intended that the VEMMP will set a roadmap for future constituent individual projects, which will be subject to the development consent procedures set down in law, principally the Planning and Development Act, 2000 (as amended) or any successor thereto. The development consent procedures for individual projects will require further assessment of the environmental effects of such future projects.
- 1.3. The VEMMP has been compiled by a multi-disciplinary team on behalf of the commissioning authorities, Fáilte Ireland in partnership with National Parks and Wildlife Service (NPWS), the Office of Public Works (OPW), the National Monuments Service (NMS), Wicklow County Council and Coillte. The multi-disciplinary team was led by *Consarc Design Group* and included *Outdoor Recreation Northern Ireland (ORNI)*, *The Paul Hogarth Company*, *Kevin McShane Ltd*, *Tandem Design* and *Cogent Management Consulting*. The Natura Impact Report was by *Faith Wilson*, Ecological Consultant and the SEA Environmental Report was by *Doyle Kent Planning Partnership Ltd*.
- 1.4. The Environmental Report and SEA Statement have been prepared by Doyle Kent Planning Partnership Ltd on behalf of Fáilte Ireland, The National Tourism Development Authority (the *competent authority*). The *Strategic Environmental Assessment : Guidelines for Regional Assemblies and Planning Authorities* (Department of Housing, Local Government and Heritage, March 2022) and the EPA document, *Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring, 2023*, informed compilation of the Statement.

## 2.0. Legislative Background

2.1. EU Directive 2001/42/EC: *On the assessment of the effects of certain plans and programmes on the environment*, is the legal instrument whereby Strategic Environmental Assessment was brought into EU law. The Directive has been transposed into Irish domestic law by regulation: SI 435/2004: *European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations, 2004*, as amended by SI 200/2011: *European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations, 2011*.

2.2. Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme, such as the *Visitor Experience & Management Masterplan (VEMMP) for Glendalough and Wicklow Mountains National Park*, before a decision is made to adopt the plan or programme. SEA aims to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development.

2.3. As stipulated in Article 16 of SI 435/2004, following completion of the Strategic Environmental Assessment and adoption by the competent authority of the relevant plan or programme, the information to be provided by the competent authority to the relevant environmental authorities and the public is to include an *SEA Statement*.

2.4. The Statement is to summarise:

- (i) how environmental considerations have been integrated into the plan or programme, or modification to a plan or programme;
- (ii) how
  - (I) the environmental report prepared in relation to the plan or programme,
  - (II) the submissions and observations made by the environmental authorities or the public to the competent authority in relation to the draft plan or programme and environmental report, and
  - (III) any consultations with other Member States of the EU,have been taken into account during the preparation of the plan or programme, or modification to a plan or programme;
- (iii) the reasons for choosing the plan or programme, or modification to a plan or programme, in the light of the other reasonable alternatives dealt with, and
- (iv) the measures decided upon to monitor the significant environmental effects of implementation of the plan or programme, or modification to a plan or programme.

2.5. The Strategic Environmental Assessment was completed by Fáilte Ireland, in accordance with the requirements of the Directive and Regulations.

### 3.0. SEA Process

3.1. The steps in the SEA process, as described in the Ministerial guidance: *Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities 2022*, are:

Stages in SEA Process	
1. Screening	Screen plans to decide if SEA is necessary
2. Scoping	Scope the contents of the Environmental Report
3. The Environmental Report	Collect baseline environmental data, consider planning alternatives, assess impacts, propose mitigation measures
4. The Environmental Report	Prepare the Environmental Report
5. Consultations on Plan and Environmental Report	Consultations with relevant environmental authorities, the public, and (if necessary) adjacent States (carried out at several stages in the SEA process)
6. Amendments to the draft Plan, adoption of Plan and preparation of the <b>SEA Statement</b>	Provide specified information on the Plan and the SEA process to the public, relevant environmental authorities and any transboundary States, following adoption of the plan.
7. Monitoring	Monitor the significant environmental effects of implementing the plan

3.2. A Strategic Environmental Assessment (SEA) of the *Visitor Experience & Management Masterplan (VEMMP) for Glendalough and Wicklow Mountains National Park* was undertaken. The relevant SEA considerations are set out in the *Environmental Report* which was placed on public display along with the *draft VEMMP* and the *Natura Impact Report* (Habitats Directive requirement) in late 2022.

### 4.0. Evolution of the VEMMP

4.1. Formulation of the *Visitor Experience & Management Masterplan (VEMMP) for Glendalough and Wicklow Mountains National Park* commenced in August 2020. The multi-disciplinary team, under the leadership of Consarc, began information collation employing relevant data bases and a Geographic Information System (GIS). The task was directed through a working group under the guidance of a Steering Group, which was composed of representatives from the sponsoring organisations, Fáilte Ireland (the competent authority) in partnership with the National Parks and Wildlife Service (NPWS), the Office of Public Works (OPW), the National Monuments Service (NMS), Wicklow County Council and Coillte. The conduct of the work was affected by the Covid emergency over the period 2020-2021, which limited travel and the arrangement of face to face meetings for a considerable time.

4.2. Key issues were identified in relation to each segment of the plan, including transportation and traffic, biodiversity and communication and related environmental effects. Consultations were held with elected members of the Wicklow County Council, members of the public and other interested parties, such as the Laragh and Glendalough Community groups, and owners of



relevant lands. An initial, non-statutory public consultation was held during February and March of 2021, primarily remotely.

- 4.3. The environmental authorities specified in the Regulations were notified of the proposed *VEMMP* and invited to make submissions regarding the scope of the Environmental Report and three responses received. A draft Scoping Report was drawn up in consultation with the Steering Group to inform the SEA process. An SEA sub-group with representation from the sponsoring organisations was formed to provide direct input into the Environmental Report. This resulted in a number of detailed issues being addressed among which were built heritage impact and flood risk assessments focused on Glendalough/Laragh.
- 4.4. The draft *VEMMP* together with appendices, the Natura Impact Report and the Environmental Report were subject of statutory consultation with the environmental authorities and the public from 11th November 2022 until 18th January 2023.
- 4.5. Following receipt of submissions from the environmental authorities and from members of the public, in response to the said public display, some adjustments to the original *draft VEMMP* were made and the Environmental Report was updated in order to take account of the adjustments. These were screened with respect to the environmental effects and were determined to be not significant.
- 4.6. The Environmental Report concluded that Implementation of the *VEMMP* will bring about positive environmental effects, by addressing the excessive concentration of visitors in certain locations, notably Glendalough and at the main attractors for walkers within the National Park. The *VEMMP* will also bring material benefit to parts of Wicklow other than Glendalough. Although the *VEMMP* has potential to also cause negative environmental impacts, with appropriate mitigation, any negative impacts will not be significant.
- 4.7. The Natura Impact Report was also updated and concluded that the *VEMMP* would not affect the integrity of any European Site, subject to certain mitigations.
- 4.8. Fáilte Ireland, having taken into account the findings of the SEA Environmental Report and other related SEA output, completed the Environmental Assessment before adoption of the *VEMMP*.
- 4.9. This SEA Statement, summarising how environmental considerations have been integrated into the Plan, has been prepared at the end of the process.

## 5.0. Environmental Commitments

- 5.1. The *VEMMP* is designed to provide a phased roadmap to protect and enhance the setting of Glendalough and the Wicklow Mountains National Park and to establish key sustainability objectives against which future projects will be assessed.
- 5.2. The commitment to sustainability is clearly expressed at Section 3.5 in the *VEMMP* Summary Document, which states that the *VEMMP* provides an opportunity to ensure that all existing and future tourism projects and initiatives within the scope of the *VEMMP* are planned, developed and managed in a sustainable and integrated manner. The protection, enhancement and promotion of the natural environment has been an integral part of the formation of the *VEMMP* as is evidenced by:
- A firm commitment to ensuring sustainable and responsible tourism principles are practised
  - Environmental assessments and resulting measuring and monitoring
  - Integration of requirements for environmental protection and management
- 5.3. Environmental assessment of the *VEMMP* has been carried out at a plan level, through Strategic Environmental Assessment and Appropriate Assessment (Habitats Directive Assessment). Potential environmental effects, both negative and positive, and appropriate mitigations were identified. Relevant monitoring measures were outlined in the Environmental Report and the Natura Impact Report. The SEA and AA team worked with the plan-preparation team to integrate requirements for environmental protection and management into the *VEMMP*. Guiding Principles for Environmental Protection and Environmental Management, together with related actions, (see below) are set out in the Environmental Report and are reflected in the main *VEMMP* documents.
- 5.4. Integration of environmental considerations is addressed in further detail at Sections 3.6 and 6.1 of the *VEMMP* Summary Document. Referenced environmental considerations include inland and coastal water quality and amenity, climate change, traffic, biodiversity, built and cultural heritage, landscape, critical infrastructure and communities. A *Masterplan Implementation Group* will be formed as part of the *VEMMP* and all objectives and actions coming from the Masterplan will require to be agreed and governed by this group.
- 5.5. Implementation of the *VEMMP* will lead to the development of related individual projects, with potential impacts on the environment. The *VEMMP* documentation, Environmental Report and Natura Impact Report set out appropriate mitigation measures to ensure accordance with the sustainability objectives. Partners and stakeholders responsible for projects coming from the *VEMMP* will be required to demonstrate compliance with measures relating to sustainable development, environmental protection and environmental management, in particular as set out in Appendix D2 of the *VEMMP*. This is likely to include further survey work, production of Visitor Management Plans and detailed Construction Environmental Management Plans (CEMP) as appropriate, at project development consent stage.
- 5.6. Fáilte Ireland and other Project Partners, with governance from the *Masterplan Implementation Group*, will provide funding and support for sustainable tourism projects that emerge as part of

the *VEMMP*. To ensure full protection of the Natura 2000 Network and wider natural environment, the *Masterplan Implementation Group* will be tasked with governance in this regard.

5.7. A suite of good practice guidelines has been formulated by Fáilte Ireland, which will guide *VEMMP* related projects. Among these are:

- Site Maintenance Guidelines
- Visitor Management Guidelines
- Environmental Management for Local Authorities and Others
- Environmental Damage Resolution
- Greenway Visitor Experience & Interpretation Toolkit
- Environmentally Responsible Tourism Promotion & Campaign Statement
- Blueway Management & Development Guide).

5.8. Extensive research by Fáilte Ireland has shown improved environmental outcomes in areas with active visitor management. Promoters of *VEMMP* related projects, where funded by Fáilte Ireland, will be required to manage any increase in visitor numbers or change in visitor behaviour to avoid significant adverse environmental effects, such as loss of natural habitat and disturbance of species. Where relevant, this will include a requirement for a *Visitor Management Plan*, incorporating monitoring. Infrastructural capacity at project level, including green infrastructure, will be considered by the *Masterplan Implementation Group* as projects resulting from the *VEMMMP* arise. Developers of such projects will be encouraged to consider environmentally sustainable solutions for any infrastructure requirements, including contributing towards the maintenance of existing green infrastructure. Fáilte Ireland's *Environmental Damage Resolution* procedure provides for a consistent approach in recognising and where required responding to perceived or actual environmental damage. This procedure will be relevant in the implementation of the *VEMMP*.

5.9. Appendix D2 to the *VEMMP* is titled *Ecological Requirements for Successful Funding and Support of Projects Resulting from the Masterplan*. The Appendix sets out further, detailed environmental requirements for *VEMMP* related projects.

5.10. Fáilte Ireland is in the process of developing an approach to awareness, guidance and support in the integration of environmental considerations with the tourism industry. The intention will be that such an approach can be considered and applied by all relevant tourism promotion bodies. This will be applicable to the outputs of this Masterplan and the various projects that come from it.

5.11. In addition to the foregoing and as required by law, projects arising from the *VEMMP* will be subject to statutory development consent procedures, principally in accordance with *the Planning and Development Acts, 2000-2022* (or any successor legislation). These procedures will include detailed assessment of the environmental effects of such future projects, including, as relevant, under the provisions of the Habitats Directive 92/43/EEC, the Birds Directive 2009/147/EC, the Floods Directive 2007/60/EC and the Environmental Impact Assessment Directive (2011/92/EU, as amended by 2014/52/EU). Public participation will be provided for in

decision making on applications for development consent, as provided for ultimately in the Aarhus Convention [UNECE: *Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters*].

Guiding Principles for Environmental Protection and Environmental Management	Actions
<p><b>Environmental protection</b></p>	<ul style="list-style-type: none"> <li>• The sustainability principle to be followed in all VEMMP related projects.</li> <li>• Net biodiversity gain to be incorporated into VEMMP related projects where possible</li> <li>• Development consent procedures to be strictly followed, as relevant, in respect of VEMMP related projects.</li> <li>• VEMMP related projects to be tested for effects in relation to environmental topics, as per Appendix D2 to <i>Draft VEMMP</i>.</li> <li>• VEMMP related projects proponents to have regard to appropriate guidance contained in:             <ul style="list-style-type: none"> <li>○ <i>Managing Natura 2000 Sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC</i> (EU updated 2019).</li> <li>○ <i>Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC</i>, EU Commission 2021.</li> <li>○ <i>Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities</i>. (Department of Environment, Heritage and Local Government, 2010 revision).</li> <li>○ <i>Office of the Planning Regulator Practice Note PN01 - Appropriate Assessment Screening for Development Management</i> (OPR, 2021).</li> <li>○ <i>Office of the Planning Regulator Practice Note PN02 – Environmental Impact Assessment Screening</i> (OPR 2021).</li> <li>○ <i>Interpretation of definitions of project categories of annex I and II of the EIA Directive</i> - EU Commission 2015</li> <li>○ <i>Guidelines on the information to be contained in Environmental Impact Assessment Reports</i> – EPA, 2022.</li> <li>○ <i>The Planning System and Flood Risk Management</i>- (Department of Environment,</li> </ul> </li> </ul>

	<p>Heritage and Local Government, 2009).</p> <ul style="list-style-type: none"> <li>○ <i>Framework And Principles for the Protection of the Archaeological Heritage</i> - Department of Arts, Heritage, Gaeltacht and the Islands, 1999.</li> <li>○ <i>Wicklow County Development Plan 2022-2028</i></li> </ul>
<b>Environmental management</b>	<ul style="list-style-type: none"> <li>• Mitigation measures will be implemented at plan level and at project level, as appropriate including per Appendix D2.</li> <li>• Monitoring will be carried out as provided for in the VEMMP and will be required in respect of VEMMP related projects.</li> <li>• Fáilte Ireland guidance</li> <li>• Environmental considerations to be integrated into promotional processes and environmentally responsible tourism campaigns associated with this Plan. Fáilte Ireland is in the process of developing an approach to awareness, guidance and support in integrating such considerations.</li> </ul>
<b>Funding</b>	<ul style="list-style-type: none"> <li>• Funding of VEMMP related projects will be conditional on adherence to the provisions for good practice set out in guidance such as the Fáilte Ireland '<i>Environmental Management for Local Authorities and Others</i>' (part of the Wild Atlantic Way suite of documents)</li> </ul>
<b>Public participation</b>	<ul style="list-style-type: none"> <li>• In respect of all VEMMP projects the Aarhus Convention in respect of public participation in decision making to be adhered to (<i>UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters</i>).</li> </ul>

*Principles in relation to Environmental Protection and Management (per Environmental Report)*

## **6.0. Mitigation**

- 6.1. The *VEMMP* is a non-statutory plan intended to provide a phased roadmap to protect and enhance the setting of Glendalough and the Wicklow Mountains National Park, and to establish key sustainability objectives against which future projects will be assessed. The area encompassed by the Masterplan is of considerable environmental sensitivity.
- 6.2. In order to achieve funding and/or promotion by Fáilte Ireland of individual tourism related land use or infrastructural projects, stakeholders will be required to demonstrate compliance with sustainable development criteria, including relevant mitigation measures. Partners and stakeholders will be required 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, ensuring that new projects are a suitable distance from ecological sensitivities. Visitor management strategies will be required for proposed *VEMMP* related programmes and projects that are to receive funding as relevant and appropriate.
- 6.3. Where it is established, by monitoring, that the carrying capacity of the receiving environment in environmentally sensitive sites is being exceeded in terms of visitor numbers or visitor impacts, measures may be implemented to address this matter, including temporary removal from the list of advertised attractions to allow for recovery.
- 6.4. The SEA and Ecology team, in consultation with the *VEMMP* team, have put forward measures to mitigate any negative environmental effects resulting from the *VEMMP*. These measures are designed to influence the manner in which projects resulting from the plan are developed and executed. The overriding principle in respect of such projects is that they be sustainable in environmental terms. Mitigation measures, as set out in the Environmental Report, are set out in the table below:

TOPIC	Potential adverse impact	Mitigation
<p><b>Biodiversity, flora, fauna</b></p>	<p>Excessive concentration of visitor activity at certain locations and the construction and operation of VEMMP projects causing:</p> <ol style="list-style-type: none"> <li>a. Loss or damage to habitats and species in European Sites, Natural Heritage Areas and Wildlife Sites</li> <li>b. Habitat fragmentation</li> <li>c. Habitat loss in non-designated areas</li> <li>d. Disturbance or displacement of species</li> <li>e. Time related impacts such as disturbance during breeding season</li> </ol>	<p>Facilitate dispersal of visitors from Glendalough and key recreational sites (e.g. Sugarloaf/Loughs Bray/Djouce) to alternative destinations and fostering a wider range of activities.</p> <p>Monitoring visitor behaviour and interaction with the natural environment enables site managers and owners to identify and develop appropriate interventions and management plans where required, including the protection and enhancement of Natura 2000 sites.</p> <p>At a plan level, the outputs and lessons from Fáilte Ireland's Wild Atlantic Way Environmental Programme 2015-2019 and its recent National Environmental Monitoring Programme 2021-2025 have been consulted. These include monitoring a range of typical tourism sites - the results and recommendation for mitigation can be taken and will be applied to VEMMP sites as appropriate. Typical types of monitoring, at project level, may include monitoring of ground nesting birds, sensitive indicators of disturbance, at Discovery Walk sites.</p> <p>Support implementation of the policies of Wicklow County Development Plan in respect of natural heritage and biodiversity.</p> <p>Support the programme of footpath repair and maintenance for upland trails.</p> <p>Require visitor/habitat management plans for VEMMP projects as relevant and appropriate.</p> <p>Ensure the potential environmental effects of a likely increase in tourists/tourism-related volumes in particular locations/along particular trails shall be considered at route selection/project design stage and mitigated as appropriate.</p> <p>Support restoration of habitats including:  Habitat restoration in the valley in Laragh/ Glendalough  Upland trail restoration to mitigate trampling etc.</p> <p>Require VEMMP projects include biodiversity enhancement proposals and control of invasive species as appropriate per Appendix D2 to <i>Draft VEMMP</i>.</p> <p>Where it is established by monitoring that habitats or species within the WMNP or other designated/protected sites are being adversely affected by visitor activity, consideration to be given to further mitigation measures will be adapted or reprogrammed or additional mitigation measures employed, as appropriate. Fáilte Irelands Environmental Damage Resolution procedure provides for a consistent approach in responding to such issues.</p>

		<p>Faillte Ireland funding of VEMMP projects shall be dependent on detailed assessment of impact on environmental sensitivities and the objectives of the VEMMP relating to sustainable development. In particular, all such projects shall have appropriate regard to:</p> <ul style="list-style-type: none"> <li>• EU Directives, including the Habitats Directive (92/43/EEC, as amended) , the Birds Directive (2009/147/EC) , the Environmental Liability Directive (2004/35/EC) , the Environmental Impact Assessment Directive (2011/92/EU, as amended by 2014/52/EU), the Floods Directive (2007/60/EC), the Water Framework Directive (2000/60/EC), the Groundwater Directive (2006/118/EC) and the Strategic Environmental Assessment Directive (2001/42/EC);</li> <li>• EU 'Guidance on integrating ecosystems and their services into decision- making' (European Commission 2019)</li> <li>• National legislation, including the Planning and Development Act 2000 (as amended), the Wildlife Act 1976 (as amended) , European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011) as amended, the European Union (Water Policy) Regulations 2003 (as amended), the European Communities (Environmental Liability) Regulations 2008 (as amended) and the Flora Protection Order 2022.</li> <li>• Screening VEMMP projects for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.</li> <li>• Relevant ecological impact assessment of any VEMMP project likely to have a significant impact on biodiversity, including on designated nature conservation sites.</li> <li>• Incorporation of appropriate avoidance and mitigation measures into development proposals as part of any ecological impact assessment.</li> <li>• Provision of a Construction Environment Management Plan (CEMP) for VEMMP projects where relevant.</li> </ul>
<p><b>Population and Human Health</b></p>	<p>Potential for adverse impacts from congestion of visitors and vehicles in terms of air, water pollution Potential adverse impacts from flooding</p>	<p>Management of visitors to have regard to <i>Fáilte Ireland Visitor Management Guidelines for the Wild Atlantic Way, 2020</i>.</p> <p>Facilitate dispersal of visitors from Glendalough to alternative destinations and fostering a wider range of activities.</p>



		<p>Design of VEMMP projects to accord with Flood Risk Management Guidelines for Planning Authorities.</p> <p>Work with statutory partners to achieve enhanced coordination of management resources in key destinations, including Glendalough.</p>
<b>Soil</b>	<p>Potential adverse effects on the hydrogeological and ecological function of the soil resource, including as a result of over concentration of visitor numbers at particularly vulnerable locations.</p>	<p>Manage visitor numbers and behaviour to avoid significant environmental effects and support restoration of pathways. Where relevant, detailed design to have regard to Fáilte Ireland guidance <i>Greenway: Experience and Interpretation Toolkit</i>.</p>
<b>Water</b>	<p>Potential adverse effects upon the status of water bodies, arising from changes in quality, flow and/or morphology.</p> <p>Increased risk of flooding with climate change</p>	<p>Check outputs of monitoring activity by others (EPA/Wicklow County Council) to confirm no adverse impacts from VEMMP projects.</p> <p>Design of VEMMP projects to accord with Flood Risk Management Guidelines for Planning Authorities.</p> <p>In relevant VEMMP projects, including in particular in Glendalough-Laragh, inclusion of rainwater management planning at project design stage, incorporating nature based Sustainable Urban Drainage Systems (SuDS), in accordance with Wicklow County Council SuDS Policy and the guidance in <i>'Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, 2022'</i> (Dept. Housing, Local Government and Heritage), to ensure surface water runoff is managed for maximum benefit including mitigation of flood risk. Any new or improved waste water treatment will comply with all EPA / Local Authority environmental criteria.</p>
<b>Air and Climatic Factors</b>	<p>Potential conflict between development under the Plan and policy to reduce carbon emissions in line with local, national and European objectives.</p> <p>Potential conflict between transport emissions, including those from cars, and air quality.</p> <p>Potential conflict with climate adaptation measures including flood risk management.</p>	<p>Support restoration of habitats as above.</p> <p>Support use of electric shuttle bus and the gradual removal of cars from Glendalough Valley area.</p> <p>Combined with subsidised shuttle bus to upland areas.</p> <p>Support mitigation measures in the Climate Action Plan 2021 and its successors.</p>
<b>Material Assets</b>	<p>Inadequate provision of facilities at car parks serving Discovery Walks etc.</p>	<p>Work with partners to bring forward design proposals for upland car parks, in accordance with <i>Fáilte Ireland Site Maintenance Guidelines</i>.</p> <p>Support the programme of upland footpath repair and maintenance.</p>
<b>Cultural Heritage</b>	<p>Potential effects on protected and unknown archaeology and protected architecture arising from construction and operation activities</p>	<ul style="list-style-type: none"> <li>Where relevant, VEMMP projects shall be designed and constructed to ensure protection and enhancement of heritage assets, including Glendalough monastic site and other archaeological sites, historic buildings.</li> <li>Relevant VEMMP projects shall take full account of the need to protect the potential UNESCO World Heritage candidate status of Glendalough monastic site.</li> </ul>

		<ul style="list-style-type: none"> <li>• Archaeological impact assessment to be required for VEMMP projects in Glendalough and other relevant locations, including archaeological monuments in vicinity of VEMMP projects, including those entered on the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological interest generally.</li> <li>• Ensure that no VEMMP project detracts from the setting of any feature or site of cultural heritage significance or which is seriously injurious to its cultural or educational value.</li> <li>• Facilitate access to and appreciation of the Glendalough monastic site, through the development of appropriate signage and heritage interpretation.</li> </ul>
<b>Landscape</b>	Occurrence of adverse visual impacts and conflicts with the appropriate protection of designations relating to the landscape.	Where relevant, VEMMP related projects to include Landscape / Visual Impact Assessment,

*Mitigation Measures*

## 7.0. Consultations

7.1. Consultations in relation to the VEMMP were carried out in two main phases, including an initial, non-statutory public consultation which was held early in 2021, from 22<sup>nd</sup> February to 26<sup>th</sup> March. A second statutory consultation was held from 11<sup>th</sup> November 2022 until 18<sup>th</sup> January 2023.

7.2. Throughout the process, meetings were held with elected members of the Wicklow County Council, members of the public and other interested parties, such as the Laragh and Glendalough Community groups, and owners of relevant lands.

### 7.3. First Phase Consultation – Non-Statutory

7.3.1. The first, non-statutory consultation phase of early 2021 was announced through the local media, including newspaper notices. Covid related restrictions favoured structuring the consultation around electronic communication.

7.3.2. There was a public consultation on the Wicklow County Council website and a ‘Survey Monkey’ questionnaire. There was a leaflet posted to residents in Glendalough and Laragh with an email question option. There were also Zoom ‘drop in’ sessions with the consultation team on three dates in February and March 2021, with places pre-booked. Each of these dates accommodated several sessions per day. The consultation was informed by a series of ‘storyboards’ portraying issues and maps outlining high level options for the VEMMP.

7.3.3. In response to the public consultation, there were 185 submissions to the on-line survey and 42 e-mail submissions. The three ‘drop in’ events were made up of 34 sessions of between 15 and 25 minutes each, facilitating 191 booked individual places.

7.3.4. Specific issues raised in the consultation encompassed a very broad range, some of the more salient being:

- Traffic and parking congestion especially affecting Glendalough / Laragh and the resident community.
- Lack of adequate transportation infrastructure.
- Need for improved visitor facilities.
- Security is a serious issue and car crime in particular.
- Need for more focused and integrated management of Glendalough and the wider National Park.
- Need to balance promotion of the visitor experience with protection of the natural environment.
- The importance of all heritage aspects across the landscape (mines, monastic, social etc) should be recognised.
- Need for better quality information provision including way finding.
- Need to protect natural habitats and address biodiversity, climate change, zero carbon.
- Conservation and nature need to be prioritised in the management plan.
- Poor integration of West Wicklow into the overall tourism scene.

- The existing Wicklow Way is the ideal spine for expanding the tourist offering into West Wicklow to visit the area.
- Need to be cognisant of population increase in Ireland in the coming years putting added pressure on Glendalough and the National Park.

7.3.5. The environmental authorities specified in the SEA Regulations were invited to make submissions regarding the scope of the Environmental Report. Acknowledgements were received on behalf of the Minister for Agriculture, Food and the Marine and the Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media. The EPA recommended certain topics be addressed in the Environmental Report and in the Masterplan.

#### 7.4. Second Phase Consultation - Statutory

7.4.1. The second phase of public consultation was the statutory display of the draft *VEMMP* together with appendices, the Environmental Report and the Natura Impact Report. This formal consultation ran from 11<sup>th</sup> November 2022 until 18<sup>th</sup> January 2023. The documents were also subject of consultation with the environmental authorities, as required under the provisions of the SEA Directive and the Irish SEA Regulations.

7.4.2. The consultation was notified in local and national media and took a broadly similar form to the previous of 2021, whereby there were e-mail submissions, an online survey, consultation ‘drop in’ sessions and one-to-one meetings. Four consultation drop in sessions were hosted on the 29<sup>th</sup> November, 6<sup>th</sup> December, 2022 and on 10<sup>th</sup> January 2023 (2) by Fáilte Ireland and the design team at the *Brockagh Centre* in Laragh. In addition, five “one-to-one” meetings were held via *Zoom* on the 7<sup>th</sup> December 2022.

7.4.3. In response, 13 submissions to the on-line survey and 15 e-mails were received. The meetings and drop in sessions elicited further comments. In summary, whilst there was overall support expressed for the draft *VEMMP*, this was not universal. There was particularly strong support for the concept of a more coordinated and integrated management of the overall National Park.

7.4.4. Transportation facilities and the control and safety of parked vehicles were significant issues for many people, with several seeking more shuttle buses, including in upland areas. Concerns were expressed in relation to some elements of the draft *VEMMP*, including the strategy of locating a new car park in Laragh, in the vicinity of the GAA grounds. There was some opposition to the proposed all ability path from Laragh to Glendalough with respect to impact on ecology and flood risk. There were assertions that individual owners of relevant lands had not been adequately consulted. The existing environment in some upland areas was a particular cause for concern, including environmental degradation, littering and control of dogs. The impact of hill walkers on upland walking routes was raised, whilst some sought improvements to the said routes, including sign posting. There were criticisms that the *VEMMP* placed insufficient emphasis on sustainability including with respect to Ireland’s Climate Change commitments.

7.4.5. The Department of the Environment, Climate and Communications (Geological Survey Ireland - GSI), the Department of Housing, Local Government and Heritage (National Parks and Wildlife Service) and the EPA made detailed submissions.

- 7.4.6. GSI noted there could be a risk to certain County Geological Sites (CGSs) and drew attention to the data sets published by that organisation and recommended these be made use of in the *VEMMP*.
- 7.4.7. The National Parks and Wildlife Service (NPWS) set out a number of concerns in relation to impacts of the *VEMMP* and stated that it is crucial that the *VEMMP* sets objectives and actions which will have no adverse impact on (European) sites to which it is connected. The NPWS sought further assessment of in-combination effects of the *VEMMP* and set out certain points regarding monitoring and mitigation measures. The EPA noted the strong commitment in the *VEMMP* to ecological protection and recommended seeking opportunities to enhance/replace biodiversity, where relevant. If monitoring of the *VEMMP* identifies adverse impacts during the implementation of the Plan, Fáilte Ireland should ensure that suitable and effective remedial action is taken.

#### 7.5. Adjustments to the VEMMP

- 7.5.1. Following receipt of submissions from the environmental authorities and from members of the public, in response to the said public display, some adjustments to the text of the original *draft VEMMP* were made, particularly with reference to sustainability, with an increased emphasis on integrating environmental protection and management.
- 7.5.2. The layout of the *VEMMP* and appendices was modified so that the appendices were more clearly labelled to improve accessibility. Environmental commitments in the *VEMMP* were brought to the fore and a new *Appendix D2* was included setting out certain pre-conditions in respect of ecological protection to be implemented at project level by applicants for funding by Fáilte Ireland of individual projects. (These requirements generally apply to Fáilte Ireland funded proposals).
- 7.5.3. Related changes were made to the Natura Impact Report and the Environmental Report, particularly reflecting the focus on balancing conservation of the natural, built and cultural heritage against the visitor destination aspect. Examination of cumulative effects was expanded in response to comment from the NPWS. Further changes to the *draft VEMMP* included omission of one *Discovery Walk* (Lackan Mass path) and a bus stop at Miners' Way on the proposed shuttle bus route to the Wicklow Gap.
- 7.5.4. Many of the points raised in the public consultation had been otherwise considered in formulation of the *draft VEMMP*. For example, the location of car parking and possible alternatives had been examined in details as had the risk of flooding in Glendalough and along the Glendasan River. The issue of traffic congestion at Glendalough was a particular focus of the *VEMMP* from an early stage. The changes to the layout of the *VEMMP* documents, following the statutory consultation, have enhanced accessibility of the documents.

## **8.0. Reasons for choosing the VEMMP as adopted**

- 8.1. The reasons for choosing the plan as adopted, in the light of other reasonable alternatives considered, include that the *VEMMP* meets the detailed requirements set out in the brief for the Masterplan.
- 8.2. Assessment of the environmental effects of the *draft VEMMP*, including in respect of the Habitats Directive, indicated that with appropriate mitigation, there will be no significant effects on the environment arising from the chosen plan. The *VEMMP* is in general accordance with the policies of the *National Planning Framework* and the *Regional Spatial and Economic Strategy (RSES)* for the Eastern and Midlands Region. There is very close alignment between the *VEMMP* and the provisions of the *Wicklow County Development Plan, 2022-2028*, including the detailed provisions of the *Laragh-Glendalough Land Use and Tourism Plan*, contained in the *County Development Plan*. These statutory plans have all been subject of Strategic Environmental Assessment.
- 8.3. Comparison of the *VEMMP* with the alternatives showed that the chosen plan outperforms the alternatives when assessed against the Strategic Environmental Objectives set out in the SEA Environmental Report. These are goals to be met by the *VEMMP* in relation to the environmental topics cited in the SEA Directive (2001/42/EC). Implementation of the *VEMMP* is likely to bring about positive environmental effects by addressing the excessive concentration of visitors in certain locations, notably Glendalough and at the main attractors for walkers within the National Park. Its implementation is also likely to bring material benefit to parts of Wicklow other than Glendalough, by dispersing tourism more widely.

## 9.0. Monitoring

- 9.1. Successful implementation of the *VEMMP* is predicated on mitigating any significant negative environmental effects likely to arise from the projects in the *VEMMP*. In order to ensure such outcome, monitoring will be required. The *Masterplan Implementation Group* will have a governance role in respect of this.
- 9.2. Monitoring can take the form of both on site inspection and review of relevant indicators compiled by others e.g. EPA or Wicklow County Council. Notably, the Wicklow County Development Plan, 2022-2028, contains extensive provision for environmental monitoring as set out in the Environmental Report for the SEA.
- 9.3. In relation to tourism, a co-ordinated effort to record and monitor visitor traffic across selected attractions and outdoor recreation areas will be required. Monitoring will include both pedestrians and vehicles at key tourism/visitor locations, including Glendalough, and record any adverse effects, such as trail erosion or littering. The results will help build a detailed understanding of visitor behaviour and ongoing trends and ensure that unintended adverse effects can be identified and avoided.
- 9.4. With respect to monitoring the effects on biodiversity and cultural heritage, monitoring will likely be concentrated on environmentally sensitive locations. This will establish a detailed baseline of the existing situation and thereby identify any increased or changed effects arising during implementation of the *VEMMP*. Monitoring can determine categories of damage, erosion, vegetation trampling, vegetation loss, soil erosion and identify likely causes of such damage. Of particular importance will be monitoring of local wildlife to be incorporated into project level design. The classification employed in the monitoring of the *Wild Atlantic Way* provides a useful example.<sup>1</sup>
- 9.5. Monitoring will be on a structured basis and will involve oversight by the *Masterplan Implementation Group*, which will include the parties to the *VEMMP* and other stakeholders. The group will agree a detailed monitoring programme and oversee focused monitoring activity. The monitoring programme will be drawn up in detail by the *Masterplan Implementation Group*.
- 9.6. The Monitoring Programme will be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It will consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects will be considered. The monitoring programme will set out the various data sources, monitoring frequencies and responsibilities.
- 9.7. The table below sets out an initial framework for monitoring but will be subject to further refinement or modification over time by the *Masterplan Implementation Group*.

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<sup>1</sup> Low Impact - No impact or a discernible impact i.e. no significant, lasting damage is identified.

Medium Impact - short term, reversible effect that is intermittent but will have no significant, long term impact.

High/Severe Impact - Severe effect that has potential to have a significant, long-term, irreversible or permanent impact.

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<b>Environmental Topic</b>	<b>Strategic Environmental Objective</b>	<b>Target</b>	<b>Monitoring Source</b>
<b>Biodiversity, Flora &amp; Fauna</b>	B1: Contribute toward compliance with EU Habitats and Birds Directives	Implementation of the VEMMP not to adversely affect the integrity of any Natura 2000 Sites	<ul style="list-style-type: none"> <li>SEA monitoring reports (frequency to be determined)</li> <li>Evidence submitted with Fáilte Ireland funding applications</li> <li>Evidence from partner organisations including NPWS and others e.g. Wicklow Uplands Council.</li> <li>Lower tier assessments associated with regulatory system including planning application decisions</li> <li>Article 17 (Habitats Directive) reports at national level by NPWS – 6 year intervals</li> <li>Article 12 (Birds Directive) monitoring reports at national level by NPWS – 6 year intervals</li> </ul>
	B2: Contribute toward environmental reinstatement and protection of Nature Conservation Sites (as defined in the Planning and Development Act)	Maintenance or restoration of favourable conservation status of habitats and species	
	B3: Contribute toward conservation and enhancement of biodiversity	Protection of flora and fauna from disturbance and restoration of selected habitats	
<b>Population and Human Health</b>	P1: Contribute toward minimisation of adverse impacts on local communities arising from excessive concentration of tourism related activity	Reduction of congestion and wider distribution of tourism in the Wicklow area	<ul style="list-style-type: none"> <li>SEA monitoring reports (frequency to be determined)</li> <li>Evidence from partner organisations including Wicklow County Council</li> </ul>
	P2: Contribute toward provision of a positive experience for visitors	Provision of improved information, interpretation and infrastructure	
<b>Soils</b>	S1: Contribute toward maintenance of the integrity and functioning of soils	Minimisation of soil sealing Protection of soil stability	<ul style="list-style-type: none"> <li>SEA monitoring reports (frequency to be determined)</li> <li>Article 17 (Habitats Directive) reports by NPWS – 6 year intervals</li> <li>Lower tier assessments associated with regulatory system including planning application decisions</li> <li>Evidence from partner organisations including Wicklow County Council</li> </ul>
<b>Water</b>	W1: Contribute toward maintenance and improvement of water quality	Maintenance or achievement of good status for surface waters and ground waters in terms of Water Framework Directive (2000/60/EC) Incorporation of nature based water management measures	<ul style="list-style-type: none"> <li>EPA Catchments.ie</li> <li>Water Framework Programme Monitoring reports</li> </ul> Other EPA reports including Quality of Bathing Waters <ul style="list-style-type: none"> <li>Evidence from partner organisations including Wicklow County Council</li> </ul>
	W2: Contribute toward maintenance of bathing water quality	Compliance with the provisions of the Bathing Water Directive (2006/7/EC)	



	W3: Contribute toward minimisation of flood risk	Compliance with Flood Risk Management Guidelines	<ul style="list-style-type: none"> <li>• Lower tier assessments associated with regulatory system including planning application decisions</li> <li>• OPW reports on flooding</li> </ul>
<b>Air and Climate</b>	S1: Contribute toward mitigation of climate change	Incorporation of climate mitigation measures in VEMMP	<ul style="list-style-type: none"> <li>• EPA emissions data</li> <li>• EPA air quality monitoring reports</li> <li>• Lower tier assessments associated with regulatory system including planning application decisions</li> </ul>
<b>Material Assets</b>	M1: Contribute toward provision of appropriately located and designed tourism infrastructure	Provision of improved and additional tourism related infrastructure at key locations	<ul style="list-style-type: none"> <li>• SEA monitoring reports (frequency to be determined)</li> <li>• Evidence from partner organisations including Wicklow County Council</li> <li>• Lower tier assessments associated with regulatory system including planning application decisions</li> </ul>
	M2: Support adequate provision for and control of tourism related traffic	Provision of transportation related infrastructure at key locations	
<b>Cultural Heritage</b>	H1: Contribute toward protection of archaeology and conservation of built heritage assets	No adverse effects on archaeological or architectural heritage arising from implementation of VEMMP	<ul style="list-style-type: none"> <li>• SEA monitoring reports (frequency to be determined)</li> <li>• Evidence from partner organisations including National Monuments, OPW and Wicklow County Council</li> <li>• Lower tier assessments associated with regulatory system including planning application decisions</li> </ul>
	H2: Support the potential of Glendalough for inscription as a World Heritage Property	Protection and enhancement of cultural heritage of Glendalough and its setting	
	H3: Support awareness of cultural heritage of Wicklow, including Glendalough	Provision of improved information and interpretation for the public	
<b>Landscape</b>	L1: Avoid conflicts with protection of landscapes designated for protection in the Development Plan	Avoidance or mitigation of impacts on designated landscapes	<ul style="list-style-type: none"> <li>• SEA monitoring reports (frequency to be determined)</li> <li>• Evidence from partner organisations including National Monuments, OPW and Wicklow County Council</li> <li>• Lower tier assessments associated with planning application decisions</li> </ul>

*Monitoring Framework for VEMMP*