

# SEA STATEMENT

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FOR THE

## **WILD ATLANTIC WAY OPERATIONAL PROGRAMME 2015-2019**

### **STRATEGIC ENVIRONMENTAL ASSESSMENT**

**for: Fáilte Ireland**

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# Section 1 Introduction

## 1.1 Introduction and Legislative Context

This is the SEA Statement for the Wild Atlantic Way Operational Programme 2015-2019.

SEA is a systematic process of predicting and evaluating the likely environmental effects of implementing a 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 and social considerations.

Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27<sup>th</sup> June 2001, on the Assessment of the Effects of Certain Plans and Programmes on the Environment, referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including tourism. The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 and the Planning and Development (Strategic Environmental Assessment) Regulations 2004. The Regulations have been amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 and the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011.

## 1.2 Content of the SEA Statement

Where SEA is undertaken, the Regulations require that a Statement available to the public and the competent environmental authorities after the finalisation of the Programme. This Statement is referred to as an SEA Statement.

The SEA Statement is required to include information summarising:

- a) how environmental considerations have been integrated into the Programme;

- b) how the following have been taken into account during the preparation of the Programme:
  - the environmental report,
  - submissions and observations made to the planning authority on the Draft Programme and Environmental Report, and
  - any transboundary consultations.
- c) the reasons for choosing the Programme in the light of the other reasonable alternatives dealt with; and
- d) the measures decided upon to monitor the significant environmental effects of implementation of the Programme.

## 1.3 Implications of SEA for the Programme

Stage 2 Appropriate Assessment<sup>1</sup> is required to be undertaken on the Programme – this necessitates the undertaking of SEA as per the requirements of the SEA Directive.

SEA has been undertaken and the findings of the SEA are expressed in an Environmental Report, the first published version of which accompanied the Draft Operational Programme on public display. The Environmental Report was updated in order to take account of:

- Recommendations contained in submissions; and
- Changes to the Draft Programme which were made on foot of submissions.

Fáilte Ireland have taken into account the findings of all relevant SEA output during their consideration of the Draft Operational Programme and before the Programme was adopted.

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<sup>1</sup> The obligation to undertake Appropriate Assessment derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC. 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 a Natura 2000 site in view of its conservation objectives.

## **Section 2 How Environmental Considerations were integrated into the Programme**

### **2.1 Introduction**

Tourism is one of many sectors operating in the west of Ireland. Fáilte Ireland is co-ordinating future Wild Atlantic Way works relating to the Discovery Points through the Operational Programme, but not developing any of these works – they will be developed by the relevant local authorities (Part 8 requirements as set out in the Planning and Development Act as amended still apply) and others.

With regard to interactions between tourism and the environment, the Operational Programme is expected to facilitate improvements in environmental management and protection along the western seaboard. This facilitation has come about as a result of the following<sup>2</sup>:

### **2.2 Engagement by Fáilte Ireland**

- Engagement on the need to facilitate environmental management and protection by Senior Management in Fáilte Ireland responsible for the Wild Atlantic Way from the very beginning of the Wild Atlantic Way concept;
  - SEA and AA team were assembled and involved during the inception of the concept.
  - This is the first time a plan/programme for the tourism sector in Ireland has undergone SEA and AA.
  - It is thought that this is the first time globally that the inception of a plan/programme for a long distance touring route has been informed from the beginning by SEA and AA processes.

### **2.3 Consultation with Environmental Authorities**

- Early and ongoing consultation with environmental authorities on SEA and AA related legislation;
  - The EPA and DAHG made themselves available for numerous meetings from an early stage in the process and an SEA Scoping Workshop was attended by representatives from the DAHG, DCENR and EPA. Written submissions and recommendations made at the various meetings, at the Workshop and while the Draft Operational Programme was on public display helped in the development and refinement of the Operational Programme and the scope of the SEA and AA.

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<sup>2</sup> It is noted that a Stage 2 Appropriate Assessment (AA) was also undertaken alongside the preparation of the Programme. The requirement for AA is provided under the EU Habitats Directive (Directive 1992/43/EEC). The AA concluded that the Programme will not affect the integrity of the Natura 2000 network (except as provided for in Section 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). The preparation of the Programme, SEA and AA has taken place concurrently and the findings of the AA have informed both the Programme and the SEA. All recommendations made by the AA were integrated into the Programme.

## 2.4 Early Consideration of Alternatives

- Early consideration of and integration of environmental considerations into alternatives and ultimately into the Operational Programme:
  - This included ongoing feedback on the environmental implications of various levels of alternatives including at route identification and delivery of the candidate Discovery Points.
  - When the consideration of alternatives determined that the initiative would be for a Single, Continuous Route (Option 3c), a number of criteria were taken into account through a Route Identification process, the findings of which were included in a “WAW (Initial) Route Identification Report” (2013, Hogarts on behalf of Fáilte Ireland). Road capacity and safety were key criteria: roads had to already have the capacity to take two-way car, camper van and minibus traffic, and separate sections of the route were identified for coaches, as appropriate. By using existing roads and having more than one route in places, to cater for coaches, the Route Identification process avoided the need to develop new roads or upgrade or widen existing roads thereby avoiding potential adverse effects.
  - The identification of candidate Discovery Points was done over various iterations and took into account a variety of considerations including those relating to the environment. A number of prospective sites were removed from the candidate list for a variety of reasons including: for not being existing laybys or viewing points; they were not compatible with environmental sensitivities present; and land ownership issues.

## 2.5 Iterative Approach to Preparation of the Operational Programme

Various environmental sensitivities and issues were communicated to the Fáilte Ireland and integrated into the Operational Programme through the SEA and AA processes.

The drafting of the Operational Programme was done in an iterative manner whereby Fáilte Ireland prepared the first draft of the Programme which was provided to CAAS who made suggestions for integration into the Programme. Fáilte Ireland then reviewed the Programme to take account of the SEA/AA suggestions and sent the following revision back to CAAS for comment. Multiple revisions of the Programme were prepared before the Draft Programme was arrived at for public display. The Draft Programme and associated SEA and AA documents were updated to take account of various issues raised in submissions made during public display.

Key aspects of the Operational Programme where environmental input was integrated include:

- Visitor Management
  - With a route extending along the entire western seaboard, the Programme facilitates contributions towards improvements in environmental management and protection by allowing for both: the management of visitors at a macro spatial level (in terms of what sections of the western seaboard could accommodate increases in visitors); and the management of visitors at a micro spatial level (in terms of what areas adjacent to viewing points, lay-bys etc. should be avoided).
  - The Programme also facilitates the management of visitors across the tourist season so that growth can be sought in times outside of the summer peak.

- Focus on Paid Bednights rather than Visitors
  - The objective of growing length of stay (paid bednights) rather than number of visitors has less potential to result in adverse environmental effects.
  - Increased length of stay in the context of the touring route is likely to lead to a better geographic distribution of visitors – which will reduce environmental and infrastructural stresses and associated effects in popular areas.
  - The Programme facilitates for a better seasonal spread of bednights – which can reduce environmental and infrastructural stresses and associated effects during peak months.
- Environmental Management and Sustainability Strategy
  - The Programme’s Environmental Management and Sustainability Strategy which requires all emerging developments and activities to continue to comply with all relevant environmental and planning requirements – as well as with Fáilte Ireland Wild Atlantic Way Guidelines for the consideration, design, management and monitoring of new and existing visitor initiatives.
  - The Programme includes an ‘Environmental Management for Local Authorities and Others’ Appendix comprising various provisions which will be complied with by local authorities and others at lower levels of decision making in order to get funding. These measures are reproduced at Table 2.1 below.
- Detailed Monitoring Strategy and Guidelines for Local Authorities
  - See Section 2.6 below.

## **2.6 Monitoring Strategy and Guidelines for Local Authorities**

- The development of a detailed Monitoring Strategy which is currently being implemented and will produce various data<sup>3</sup> including an indication of the types of impacting activities at Signature Discovery Points and control sites (and the extent of ecological effect zones, if present) and the type of mitigation responses which may be required.
- The route and the candidate Discovery Points may change if the environmental monitoring strategy in particular locations produces results that show that visitor activity and/or visitor intensification is predicted or observed to result in a negative impact on the environment. For this reason, a mid-term review of the route and the candidate Discovery Points has been built into the Operational Programme. The Monitoring Strategy is included as an Appendix to the Operational Programme.
- Findings from the Environmental Monitoring will be used to inform Local Authorities, through the publication of a set of guidelines, on the nature and extent of any proposed interventions at candidate Discovery Points and candidate Signature Discovery Points in order to improve visitor management at these sites, where appropriate. The guidelines will be prepared in consultation with the Environmental Authorities.
- Central to the monitoring of the Operational Programme will be the establishment of a Monitoring Group. This establishment is provided for by the Operational Programme on foot of submissions from various environmental authorities including the National Parks and Wildlife Service and the Environmental Protection Agency. The establishment of the Monitoring Group is to ensure that

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<sup>3</sup> The programme of indicators and targets for monitoring the effects of implementing the Operational Programme included in this SEA Statement (see Section 5) will be further refined when the findings of the Monitoring Strategy emerge.

robust systems are in place, in appropriate existing authorities, to ensure that all key commitments made at the Programme level will be delivered effectively (including at the appropriate time), and to ensure that no adverse effects on the integrity of the environment will result.

**Table 2.1 Provisions contained in Operational Programme Appendix 'Environmental Management for Local Authorities and Others'**

Topic <sup>4</sup>	Requirement <sup>5</sup>
<b>All</b>	<p><b>Regulatory framework for environmental protection and management</b></p> <p>Local authorities and others shall cumulatively contribute towards – in combination with other users and bodies – the achievement of the objectives of the regulatory framework for environmental protection and management. Local authorities and others will demonstrate, as appropriate, that plans, programmes and projects comply with EU Directives - including the Habitats Directive (92/43/EEC, as amended), the Birds Directive (2009/147/EC), the Environmental Impact Assessment Directive (85/337/EEC, as amended) and the Strategic Environmental Assessment Directive (2001/42/EC) – and relevant transposing Regulations.</p>
<b>All</b>	<p><b>Information to be considered by local authorities and others at lower levels of decision making and environmental assessment</b></p> <p>Lower levels of decision making and environmental assessment by local authorities and others, as relevant, should consider the sensitivities identified in Section 4 of the SEA Environmental Report, including the following:</p> <ul style="list-style-type: none"> <li>• Candidate Special Areas of Conservation and Special Protection Areas;</li> <li>• Features of the landscape that provide linkages/connectivity to designated sites (e.g. watercourses, areas of semi-natural habitat such as linear woodlands etc)</li> <li>• Salmonid Waters;</li> <li>• Shellfish Waters;</li> <li>• Freshwater Pearl Mussel catchments;</li> <li>• Nature Reserves;</li> <li>• Natural Heritage Areas and proposed Natural Heritage Areas;</li> <li>• Areas likely to contain a habitat listed in annex 1 of the Habitats Directive;</li> <li>• Entries to the Record of Monuments and Places and Zones of Archaeological Potential;</li> <li>• Entries to the Record of Protected Structures;</li> <li>• Un-designated sites of importance to wintering or breeding bird species of conservation concern;</li> <li>• Architectural Conservation Areas; and</li> <li>• Relevant landscape designations.</li> </ul>
<b>All</b>	<p><b>Construction and Environmental Management Plan</b></p> <p>Construction Environment Management Plans (CEMPs) shall be prepared in advance of the construction of larger projects and implemented throughout. Such plans shall incorporate relevant mitigation measures indicated in this Appendix to the Operational Programme and any lower tier Environmental Impact Statement or Appropriate Assessment. CEMPs typically provide details of intended construction practice for the proposed development, including:</p> <ol style="list-style-type: none"> <li>a. location of the sites and materials compound(s) including area(s) identified for the storage of construction refuse,</li> <li>b. location of areas for construction site offices and staff facilities,</li> <li>c. details of site security fencing and hoardings,</li> <li>d. details of on-site car parking facilities for site workers during the course of construction,</li> <li>e. details of the timing and routing of construction traffic to and from the construction site and associated directional signage,</li> <li>f. measures to obviate queuing of construction traffic on the adjoining road network,</li> <li>g. measures to prevent the spillage or deposit of clay, rubble or other debris,</li> <li>h. alternative arrangements to be put in place for pedestrians and vehicles in the case of the closure of any public right of way during the course of site development works,</li> <li>i. details of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels,</li> <li>j. containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained; such bunds shall be roofed to exclude rainwater,</li> <li>k. disposal of construction/demolition waste and details of how it is proposed to manage excavated soil,</li> <li>l. a water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains,</li> <li>m. details of a water quality monitoring and sampling plan.</li> <li>n. if peat is encountered - a peat storage, handling and reinstatement management plan.</li> <li>o. measures adopted during construction to prevent the spread of invasive species (such as Japanese Knotweed).</li> <li>p. appointment of an ecological clerk of works at site investigation, preparation and construction phases.</li> </ol>

<sup>4</sup> The SEA Directive identifies a number of environmental topics which must be considered in the assessments being undertaken for plans and programmes. These topics are listed in this column and comprise biodiversity and flora and fauna, population and human health, soil, water, air and climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape.

<sup>5</sup> The provisions listed under this column are the requirements which the local authorities and others will have to comply with in order to get funding.

<b>All</b>	<p><b>Maintenance Plan</b> Lower tier assessments should examine the need for Maintenance Plans informed by environmental considerations to be prepared and implemented.</p>
<b>Biodiversity and flora and fauna</b>	<p><b>Protection of Biodiversity including Natura 2000 Network</b> Local authorities and others shall contribute, as appropriate, towards the protection of designated ecological sites including candidate Special Areas of Conservation (cSACs) and Special Protection Areas (SPAs); UNESCO World Heritage and UNESCO Biosphere sites; Ramsar Sites; Salmonid Waters; Shellfish Waters; Freshwater Pearl Mussel catchments; Flora Protection Order sites; Wildlife Sites (including Nature Reserves); Certain entries to the Water Framework Directive Register of Protected Areas; Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs); Wildfowl Sanctuaries (see S.I. 192 of 1979) ; and Tree Preservation Orders (TPOs). Local authorities and others shall demonstrate compliance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including the following and any updated/superseding documents):</p> <ul style="list-style-type: none"> <li>• EU Directives, including the Habitats Directive (92/43/EEC, as amended)<sup>6</sup>, the Birds Directive (2009/147/EC)<sup>7</sup>, the Environmental Liability Directive (2004/35/EC)<sup>8</sup>, the Environmental Impact Assessment Directive (85/337/EEC, as amended), the Water Framework Directive (2000/60/EC) and the Strategic Environmental Assessment Directive (2001/42/EC).</li> <li>• National legislation, including the Wildlife Act 1976<sup>9</sup>, the European Communities (Environmental Impact Assessment) Regulations 1989 (SI No. 349 of 1989) (as amended), the Wildlife (Amendment) Act 2000, the European Union (Water Policy) Regulations 2003 (as amended), the Planning and Development Act 2000 (as amended), the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011), the European Communities (Environmental Liability) Regulations 2008<sup>10</sup> and the Flora Protection Order 1999.</li> <li>• National policy guidelines (including any clarifying Circulars or superseding versions of same), including the Landscape and Landscape Assessment Draft Guidelines 2000, the Environmental Impact Assessment Sub-Threshold Development Guidelines 2003, Strategic Environmental Assessment Guidelines 2004 and the Appropriate Assessment Guidance 2010.</li> <li>• Catchment and water resource management Plans, including River Basin District Management Plans 2009-2015 (including any superseding versions of same).</li> <li>• Biodiversity Plans and guidelines, including Actions for Biodiversity 2011-2016: Ireland's 2<sup>nd</sup> National Biodiversity Plan (including any superseding version of same).</li> <li>• Ireland's Environment 2014 (EPA, 2014, including any superseding versions of same), and to make provision where appropriate to address the report's goals and challenges.</li> </ul> <p><b>Appropriate Assessment</b> All projects and plans arising from this programme will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. A plan or project will only be authorised after the competent authority has ascertained, based on scientific evidence, Screening for Appropriate Assessment, and a Stage 2 Appropriate Assessment where necessary, that:</p> <ol style="list-style-type: none"> <li>1. The Plan or project will not give rise to significant adverse direct, indirect or secondary effects on the integrity of any European site (either individually or in combination with other plans or projects); or</li> <li>2. The Plan or project will have significant adverse effects on the integrity of any European site (that does not host a priority natural habitat type/and or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000; or</li> <li>3. The Plan or project will have a significant adverse effect on the integrity of any European site (that hosts a natural habitat type and/or a priority species) but there are no alternative solutions and the plan or project must nevertheless be carried out for imperative reasons for overriding public interest, restricted to reasons of human health or public safety, to beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest. In this case, it will be a requirement to follow procedures set out in legislation and agree and undertake all compensatory measures necessary to ensure the protection of the overall coherence of Natura 2000.</li> </ol> <p><b>Protection of Natura 2000 Sites</b> No projects giving rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this programme (either individually or in combination with other plans or projects<sup>11</sup>).</p>

<sup>6</sup> Including Annex I habitats, Annex II species and their habitats and Annex IV species and their breeding sites and resting places (wherever they occur). Note that the NPWS provide sensitive areas mapping for Freshwater Pearl Mussels which are listed under Annex II of the Directive.

<sup>7</sup> Including Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur).

<sup>8</sup> Including protected species and natural habitats.

<sup>9</sup> Including species of flora and fauna and their key habitats.

<sup>10</sup> Including protected species and natural habitats.

<sup>11</sup> Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:



	<p><b>NPWS &amp; Integrated Management Plans</b> Regarding, integrated management plans, Article 6(1) of the Habitats Directive requires that Member States establish the necessary conservation measures for Special Area of Conservation involving, if need be, appropriate management plans specifically designed for the sites or integrated into other development plans. The NPWS's current priority is to identify site specific conservation objectives; management plans may be considered after this is done. Where Integrated Management Plans are being prepared for a Natura sites (or parts thereof), Fáilte Ireland and local authorities shall engage with the National Parks and Wildlife Service in order to ensure that plans are fully integrated with the Operational Programme and other plans and programmes, with the intention that such plans are practical, achievable and sustainable and have regard to all relevant ecological, cultural, social and economic considerations and with special regard to local communities.</p> <p><b>Coastal Zone Management</b> Local authorities and others shall demonstrate that works will be undertaken in accordance with best practice and local authorities and others shall, as appropriate: support measures to protect the coast, the coastal edge and coastal habitats; and facilitate an Integrated Coastal Zone Management approach to ensure the conservation, management and projection of man-made and natural resources of the coastal zone.</p> <p><b>Biodiversity and Ecological Networks</b> Local authorities and others shall demonstrate, as appropriate, protection and enhancement of biodiversity and ecological connectivity, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, geological and geo-morphological systems, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones in the context of Article 10 of the Habitats Directive.</p> <p><b>Protection of Riparian Zone and Waterbodies and Watercourses</b> Local authorities and others shall demonstrate that waterbodies and watercourses are protected from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. This will include protection buffers in riverine, wetland and coastal areas, as appropriate.</p> <p><b>Non-Designated Sites</b> Local authorities and others shall demonstrate the appropriate protection of non-designated habitats and landscapes and to conserve the biological diversity.</p> <p><b>Non-native invasive species</b> Local authorities and others shall support, as appropriate, the National Parks and Wildlife Service's efforts to seek to control the spread of non-native invasive species on land and water.</p>
<p><b>Population and human health</b></p>	<p><b>Human Health</b> Local authorities and others shall assess proposals for development in terms of, inter alia, potential impact on existing adjacent developments, existing land uses and/or the surrounding landscape. Where proposed developments would be likely to have a significant adverse effect on the amenities of the area through pollution by noise, fumes, odours, dust, grit or vibration, or cause pollution of air, water and/or soil, local authorities and others shall ensure the introduction of mitigation measures in order to eliminate adverse environmental impacts or reduce them to an acceptable operating level.</p>
<p><b>Soil</b></p>	<p><b>Soil Protection and Contamination</b> Local authorities and others shall ensure that adequate soil protection measures are undertaken where appropriate. Adequate and appropriate investigations shall be carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work, where brownfield development is proposed.</p> <p><b>Areas of geological interest</b> Local authorities and others shall demonstrate protection and maintenance of the character, integrity and conservation value of features or areas of geological interest.</p>
<p><b>Water</b></p>	<p><b>Water Framework Directive and associated legislation</b> Local authorities and others shall contribute towards, as appropriate, the protection of existing and potential water resources, and their use by humans and wildlife, including rivers, streams, wetlands, groundwater, coastal waters and associated habitats and species in accordance with the requirements and guidance in the EU Water Framework Directive 2000 (2000/60/EC), the European Union (Water Policy) Regulations 2003 (as amended), the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (SI No. 272 of 2009), the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (groundwater) Regulations, 2010 (S.I. No. 9 of 2010) and other relevant EU Directives, including associated national legislation and policy guidance (including any superseding versions of same). Local authorities and others shall support the application and implementation of a catchment planning and management approach to development and conservation, including the implementation of Sustainable Drainage System techniques for new development.</p> <p><b>River Basin Management Plan</b> Local authorities and others shall support the implementation of the relevant recommendations and measures as outlined in the various River Basin Management Plans 2009 – 2015, and associated Programmes of Measures, or any such plans that may supersede same during the lifetime of the Operational Programme, as well as relevant recommendations contained in the Water Quality in Ireland 2007 – 2009 (EPA, 2011, and any updated/superseding document). Local authorities and others shall demonstrate that proposals for development would not have an unacceptable impact on the water environment, including surface waters, groundwater quality and quantity, river corridors and associated woodlands and coastal</p>

- a) no alternative solution available,
- b) imperative reasons of overriding public interest for the project to proceed; and
- c) Adequate compensatory measures in place.

	<p>waters. Also local authorities and others shall have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Document No. 20 which provides guidance on exemptions to the environmental objectives of the Water Framework Directive.</p> <p><b>Bathing Water</b> Local authorities and others shall contribute towards the achievement of the requirements of the EU Bathing Water Directive and transposing Bathing Water Quality Regulations (SI No. 79 of 2008) and EU Mandatory Values, as a minimum, and EU Guide Values, where possible.</p> <p><b>Flood Risk Management Guidelines</b> Local authorities and others shall support, as appropriate, in co-operation with the OPW, the implementation of the EU Flood Risk Directive (2007/60/EC), the Flood Risk Regulations (SI No. 122 of 2010), the DEHLG/OPW publication <i>The Planning System and Flood Risk Management Guidelines</i> (2009) (including any clarifying Circulars or superseding versions of same) and relevant outputs of the Catchment and Flood Risk Assessment and Management Studies (CFRAMS).</p> <p><b>Surface Water Drainage and Sustainable Drainage Systems (SuDs)</b> Local authorities and others shall ensure that new development is adequately serviced with surface water drainage infrastructure and promote the use of Sustainable Drainage Systems as appropriate.</p>
<b>Air and Climatic Factors</b>	<p><b>Infrastructure for Walking, Cycling and Water-based activities</b> Local Authorities and others shall work with Fáilte Ireland, the National Trails Office, Coillte, the Department of the Environment, Heritage and Local Government and the Department of Transport, Tourism and Sport, and other relevant stakeholders, to improve on the existing level of infrastructure and facilities for walking, cycling and water-based activities along the Wild Atlantic Way.</p>
<b>Material Assets</b>	<p><b>Construction Waste</b> Local authorities and others shall demonstrate that all waste arising during construction phase will be managed and disposed of in a way that ensures the provisions of the Waste Management Acts and regulations and Regional Waste Management Plans. Construction Waste Management Plans will be implemented by local authorities and others to minimise waste and ensure correct handling and disposal of construction waste streams in accordance with the Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects, Department of the Environment, July 2006.</p> <p><b>Waste Creation</b> Local authorities and others shall support the minimisation of waste creation and promote a practice of reduce, reuse and recycle where possible.</p> <p><b>Waste Disposal</b> Local authorities and others shall safeguard the environment by seeking to ensure that residual waste is disposed of appropriately.</p> <p><b>Irish Water</b> Local authorities and others shall co-operate with and support, as relevant and appropriate, Irish Water in its new role as the lead authority for water services.</p>
<b>Cultural Heritage</b>	<p><b>Archaeological Heritage</b> Local authorities and others shall contribute, as appropriate, towards the protection and sympathetic enhancement of archaeological heritage, in particular by implementing the relevant provisions of the Planning and Development Act 2000 (as amended) and the National Monuments Act, 1930 (as amended).</p> <p><b>Protection of Archaeological Sites</b> Local authorities and others shall contribute, as appropriate, towards the protection of archaeological sites and monuments and their settings, archaeological objects and underwater archaeological sites that are listed in the Record of Monuments and Places, in the ownership/guardianship of the State, or that are subject of Preservation Orders or have been registered in the Register of Historic Monuments. Contribute, as appropriate, towards the protection and preservation of archaeological sites, which have been identified subsequent to the publication of the Record of Monuments and Places.</p> <p><b>Consultation</b> Local authorities and others shall consult with the National Monuments Service of the Department of Arts Heritage and the Gaeltacht in relation to proposed developments adjoining archaeological sites.</p> <p><b>Underwater Archaeological Sites</b> Local authorities and others shall contribute, as appropriate, towards the protection and preservation of underwater archaeological sites in riverine, intertidal and sub-tidal locations.</p> <p><b>Architectural Heritage</b> Local authorities and others shall help to ensure the appropriate protection of architectural heritage by complying, as appropriate, with the legislative provisions of the Planning and Development Act 2000 (as amended) in relation to architectural heritage and the policy guidance contained in the Architectural Heritage Protection Guidelines 2011 (and any updated/superseding document).</p>
<b>Landscape</b>	<p><b>Landscape Designations</b> Local authorities and others shall contribute, as appropriate, towards the protection of county and local level landscape designations from incompatible developments. Proposals for development that have the potential to significantly adversely impact upon these designations shall be accompanied by an assessment of the potential landscape character and visual impacts of the proposed development - demonstrating that landscape impacts have been anticipated and avoided to a level consistent with the sensitivity of the landscape and the nature of the designation. Such assessments should be prepared having regard to the relevant aspects of the Guidelines for Landscape and Visual Impact Assessment (2013 Landscape Institute).</p> <p><b>Coastal Areas and Seascapes</b> Local authorities and others shall protect the character and visual potential of the coast and conserve the character and quality of seascapes.</p>

## Section 3 Environmental Report and Submissions/Observations

### 3.1 Introduction

This section details how both the Environmental Report and submissions and observations made to Fáilte Ireland on the Environmental Report and SEA process have been taken into account during the preparation of the Operational Programme.

### 3.2 SEA Scoping Submissions

#### 3.2.1 Introduction

As part of the scoping process, environmental authorities<sup>12</sup> (as well as the relevant transboundary authority in Northern Ireland, the Northern Ireland Environment Agency) were notified that a submission or observation in relation to the scope and level of detail of the information to be included in the environmental report could be made to Fáilte Ireland.

Submissions were made by the following environmental authorities:

1. Department of Arts, Heritage and the Gaeltacht (DAHG)
2. Department of Agriculture, Food and Marine (DAFF)
3. Department of Communications, Energy and Natural Resources (DCENR)
4. Environmental Protection Agency (EPA)
5. Northern Ireland Environment Agency (Department of the Environment Northern Ireland)

The EPA and DAHG made themselves available for numerous meetings from an early stage in the process and an SEA Scoping Workshop was attended by representatives from the DAHG, DCENR and EPA. Key actions arising from the

scoping meeting for the Operational Programme and SEA included the following:

- Operational Programme to consider the opportunity for responsible awareness raising that the initiative offers.
- SEA to make reference to range of routes to the WAW.
- SEA to provide regional assessment of environmental sensitivities. Assessment to provide details of environmental sensitivities, threats, and responses on a regional level.
- SEA to identify that lower tiers of decision making will be subject to the strategic mitigation measures arising from the SEA and AA.
- SEA to clarify that part 8 requirements still apply.
- SEA to consider benefits of concentrating and managing visitors at specific sites.
- Implementation of Operational Programme to allow for interactions with plans for environmental components e.g. ecology, archaeological heritage.
- SEA to consider interactions and linkages with other plans and programmes
- SEA to capture both changes to the OP and to Fáilte Ireland's practices since the beginning of the process.
- Include decision tree illustrating selection of preferred alternative.

The written submissions and the recommendations made at the various meetings and the SEA Scoping Workshop helped in the development and refinement of the Operational Programme and the scope of the SEA and AA.

### 3.3 Submissions on the Environmental Report

Furthermore, various submissions were made on the Draft Programme and SEA Environmental Report while they were on public display and these resulted in updates being made to both the Programme and SEA documents. These

<sup>12</sup> The following authorities were notified: Environmental Protection Agency, Department of Communications, Energy and Natural Resources, Department of Agriculture, Fisheries and Food, Department of the Environment, Community and Local Government and the Department of Arts, Heritage and the Gaeltacht.

updates are detailed in Appendix I to the SEA Statement "Report on Submissions".

### **3.4 Environmental Report**

The Draft Programme and accompanying documents (including SEA Environmental Report and AA Natura Impact Report) were placed on public display, having integrated all recommendations arising from the SEA and AA processes.

Responses to submissions made on the Environmental Report during the period of public display were integrated into a Report on Submissions and considered by Fáilte Ireland.

The SEA Environmental Report was updated in order to take account of recommendations included in the submissions as well as changes which were made to the original Draft Programme that was placed on public display.

Changes to the original Draft Programme that was placed on public display were examined for the need to undertake SEA and AA. It was determined, taking into account the provisions which were already integrated into the Draft Programme, that the changes would not be likely to result in significant environmental effects nor would they impact upon the Natura 2000 network of sites.

Fáilte Ireland have taken into account the findings of all relevant SEA output during their consideration of the Draft Operational Programme and before the Programme was adopted.

On adoption of the Programme, the original Environmental Report which had been placed on public display alongside the Draft Programme was updated to become a final Environmental Report which is consistent with the adopted Programme.

## **Section 4 Reasons for choosing the selected alternative in light of other alternatives considered**

### **4.1 Description of Alternatives**

#### **4.1.1 Introduction**

As per the requirements of the SEA Directive, the SEA considers reasonable alternatives, which are capable of being implemented for the Wild Atlantic Way Operational Programme, taking into account the objectives and the geographical scope of the Programme.

The alternatives are evaluated in Section 4.2 resulting in the identification of potential effects and informing the development of the Programme. The evaluation of alternatives will inform the decision-making framework for future projects.

#### **4.1.2 Rational**

As the National Tourism Development Authority, Fáilte Ireland needed to respond to the significant decline in international bednights and revenue in the west of Ireland that had occurred between 2007 and 2010 with a marketing initiative that would help to arrest and eventually begin to reverse this decline.

A wide range of options were open to the Authority and all were considered, as detailed below.

#### **4.1.3 Alternatives**

##### **Option 1: Continuation of Uncoordinated Approach**

Option 1 was to continue with a regional approach to tourism development in the west, with each of four regions competing with one another for market share, but all contributing to a large mix of destination brands which have previously struggled for attention in the international marketplace.

In terms of touring routes, over 35 were identified which touched upon the west coast, but only three of which crossed a county boundary.

Any of the existing brands in the west of Ireland lacked the scale and singularity required to be noticed in overseas markets.

##### **Option 2: Further Growth of Popular Centres**

Option 2 was to focus future growth on those centres that are currently popular with visitors and try to grow them further. This option would involve the development of a single attraction of sufficient scale to focus attention on the west coast. Such an attraction would be of a scale similar to that of the recently developed Titanic Visitor Centre in Belfast.

##### **Option 3: Single Overarching Brand - Coastal Touring Routes**

Option 3 was to have a single, overarching brand for the west of Ireland which would equip it with a greater potential to achieve 'cut-through' in target overseas markets by developing the concept of the Wild Atlantic Way as both a brand and a touring route. Comparator experiences such as the Great Ocean Road (Australia), the Garden Route (South Africa) and the Big Sur (North America) were all examined.

The brand was tested and consumer groups responded very positively to it. In order to deliver on the brand proposition, the route identified had to be a coastal route.

### **Option 3a Greenway Route**

As part of this option, the development of a single walking route or greenway (including cycling) was considered. The model for this was the Wales Coast Path which was in development at the time.

### **Option 3b Most Scenic Driving Routes only**

Option 3b was considered as part of the route identification process and involved only including those roads that were most scenic or which had largely unbroken views of the coast. This was the approach taken in identifying the 16 National Touring Routes in Norway.

### **Option 3c Single, Continuous Route**

Option 3c was to identify a single, contiguous route along the entire west coast, from Co. Donegal to Co. Cork. It was deemed that this would create the necessary scale and singularity required for a brand that was to be visible in key overseas markets.

It was decided as part of this option to eventually identify and include a number of loops inland off the main spine within the first five years of operation. The reason why this wasn't done immediately was because it was considered that it would result in a dilution of the brand during the formative years if a large portion of the route was in-land as opposed to predominately coastal and, thereby, not directly 'on-brand'.

One of the key considerations in the route identification process, which included collective stakeholder decision-making and public consultation, was to ensure that the route to be chosen had to have the capacity to take two-way car, camper van and minibus traffic, while separate sections of the route were identified for coaches, as appropriate. This was to avoid the selection of routes in sensitive areas that would require expansion or renewal works. Where roads along the coast with continuous sea-views were deemed to be too narrow, spurs from a wider road which ended in an existing beach car park or viewing point ('Discovery Point') were identified. This meant that even if the chosen route did not closely follow the coast due to capacity issues, the visitor was never very far at any one time from a view of the Atlantic.

Within Option 3c 'Single, Continuous Route' there are three sub-options for the provision of Discovery Points (viewing points and lay-bys) as follow:

#### **3c (i) No Discovery Points, continuation of uncoordinated tourism projects**

The Programme under this alternative does not provide for Discovery Points but allows for the continuation of new, uncoordinated tourism projects along the western seaboard undertaken by a variety of local groups, private landowners and local authorities.

#### **3c (ii) New Discovery Points**

The Programme under this alternative provides for a coordinated set of new Discovery Points.

#### **3c (iii) Restriction of new development, Limit in number of Discovery Points**

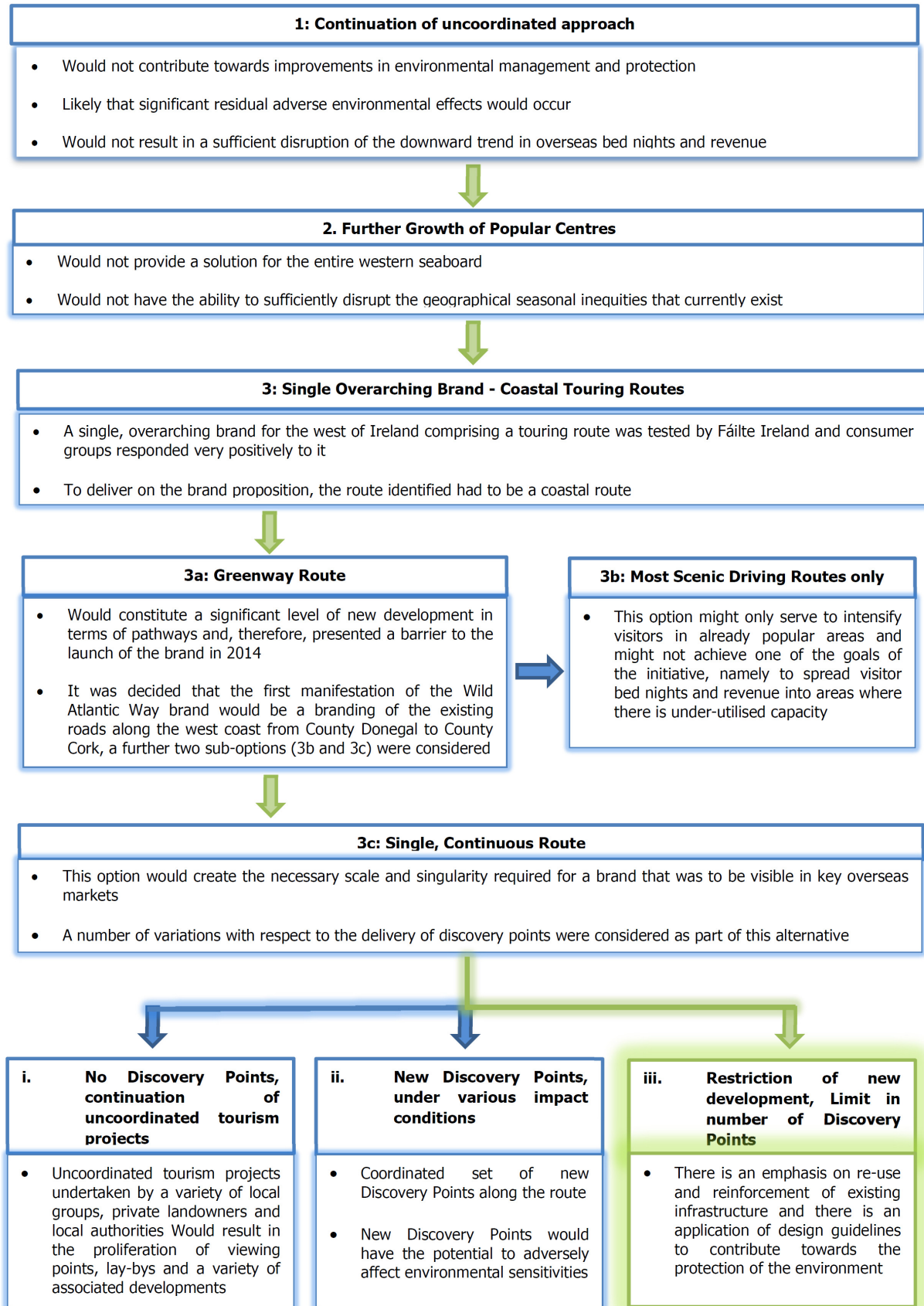
The Programme under this alternative facilitates a restriction of new development and limits the number of Discovery Points. There is an emphasis on re-use and reinforcement of existing infrastructure and there is an application of design guidelines to contribute towards the protection of the environment.

## **4.2 Evaluation of Alternatives**

### **4.2.1 Overview**

A schematic decision tree for the process of arriving at the selected alternative (which has been informed by the evaluation of environmental effects) is provided at Figure 4.1 overleaf.

Further detail on the evaluation of environmental effects is provided on subsequent pages.



**Figure 4.1 Decision Tree for Selected Alternative**

## **4.2.2 Effects as a result of Development and Needs External to the Route**

Effects as a result of development and needs external to the route taken by tourists along the western sea board arising from implementation of the Programme are influenced by the extent of growth in visitor numbers. Higher growth does not necessarily result in a greater number and extent of potential effects – some of the options have the ability to accommodate growth by spreading it over various locations and away from the traditional summer peak visitor time.

The Programme will comprise one of many factors which could attract visitors to the west coast.

All alternatives would contribute towards travel related emissions to air as a result of visitors getting to Ireland and to the west coast. Although transport policy is currently not the subject of SEA in Ireland, the Monitoring Strategy that is being implemented will provide information relating to journeys by visitors to Ireland by air – this information will be made available to transport planning and associated environmental assessments. Traffic issues are dealt with by county/regional assessment of land use plans – there are currently no SEA provisions for air, port and rail traffic. Site management is only an SEA issue at site level – traffic management on public roads is a matter for local authorities and Gardaí and its growth is a part of management and planning at county level – which already includes tourism traffic – and is subject to its own assessment.

Each of the alternatives could, in combination with land use plans (which provide for the needs associated with tourism e.g. accommodation, infrastructural capacity) and other sectoral plans (which take account of fluctuations in population due to tourism e.g. plans for water services which are the responsibility of Irish Water) result in various potential adverse effects on all parts of the environment.

With regard to built development, such as that relating to accommodation, bars or restaurants, these are planned and permitted through land use plans including Regional, County and Local Plans which are required to take into account fluctuating needs, such as those that may arise as a result of existing and future numbers of residents and tourists. These land use plans are required to undergo SEA and comply with environmental legislation.

With regard to infrastructure and services, such as those relating to water services, these are planned and permitted through specific processes which are informed by, inter alia, the needs of land use plans including Regional, County and Local Plans which are required to take into account fluctuating needs, such as those that may arise as a result of existing and future numbers of residents and tourists. These land use plans and plans from other sectors are required to undergo SEA and comply with environmental legislation.

## **4.2.3 Option 1: Continuation of Uncoordinated Approach**

This option would involve continued uncoordinated maintenance, repair and development of tourism projects over 35 touring routes.

This option would not contribute towards improvements in environmental management and protection and would be the most likely option whereby significant residual adverse environmental effects would occur.

Works would be undertaken by a variety of local groups, private landowners and local authorities outside of a framework resulting in the proliferation of viewing points and associated developments – potentially including new and improved access roads – along the entirety of the route. Impacts and mitigation along the western seaboard would not be considered as a whole, only on a case by case basis where works are part of formal consenting procedures.



There would be little or no management of visitors:

- At a macro spatial level in terms of what sections of the western seaboard could accommodate increases in visitors;
- At a micro spatial level in terms of what areas adjacent to viewing points, lay-bys etc. should be avoided; and
- In terms of time; it is likely that the summer peak would be accentuated.

This lack of coherent planning and management would have the potential to contribute towards increasing stresses on sensitive environments (including ecology, water resources, landscapes and cultural heritage) and infrastructure.

In addition to the above, Fáilte Ireland considered that pursuing this option would not result in a sufficient disruption of the downward trend in overseas bed nights and revenue that was the case at the time. It was this 'status quo' option that had been in force when the decline occurred so there is no evidence to suggest that it would have the ability to arrest or reverse the decline.

#### **4.2.4 Option 2: Further Growth of Popular Centres**

This option would: focus growth currently popular centres with the objective of making them more popular; and involve the development of a single attraction of sufficient scale to focus attention on the west coast.

The Programme for this option would theoretically present an opportunity to contribute towards improvements in environmental management and protection; however this opportunity would be severely constrained by the main objective of the Programme, focusing visitors into currently popular locations. It is unlikely that real improvements in environmental management and protection would be achieved.

Visitors would be directed to the most popular locations along the most popular sections of the western seaboard. This would lead to the need to develop clusters of new viewing points and associated developments – potentially including new and improved access roads. The construction of these new developments would present potential adverse environmental effects which would be concentrated in the most popular locations. Significant increases in pressure upon sensitive environments (including ecology, water resources, landscapes and cultural heritage) and increases in demand on infrastructure could lead to direct, indirect and cumulative environmental effects in these locations.

The Programme could mitigate impacts by managing visitors across the tourist season so that growth is sought in times outside of the summer peak; the extent to which this would be successful is uncertain due to the focus on a small number of already popular locations as well as a single attraction of sufficient scale to focus attention on the west coast.

In addition to the above, Fáilte Ireland considered such an approach would not provide a solution for the entire western seaboard and would not have the ability to sufficiently disrupt the geographical seasonal inequities that currently exist along the west coast. It was also considered that it would be more appropriate as part of a tourism development strategy for a large urban centre, as the Titanic Visitor Centre was for Belfast.

## 4.2.5 Option 3: Single Overarching Brand - Coastal Touring Routes

Options 3a, 3b and 3c provide for a single, overarching brand for the west of Ireland comprising a touring route.

### **Option 3a: Greenway Route**

By providing for the development of a single walking route or greenway (including cycling), this route would contribute towards increases in sustainable mobility and reductions in travel related emissions to air.

The Programme for this option would present an opportunity to contribute towards improvements in environmental management and protection by allowing for both: the management of visitors at a macro spatial level (in terms of what sections of the western seaboard could accommodate increases in visitors); and the management of visitors at a micro spatial level (in terms of what areas adjacent to viewing points, lay-bys etc. should be avoided). This option would also allow for the management of visitors across the tourist season so that growth could be sought in times outside of the summer peak. There would be potential for success in this regard due to the wide extent of the route.

The above management of visitors would have the potential to both: contribute towards the protection of sensitive environments (including ecology, water resources, landscapes and cultural heritage) by minimising potential stresses; and avoid increases in infrastructural demand during the summer peak season.

The development of pathways and cycleways under this option would result in potential adverse environmental effects with respect to various environmental components (including ecology, soil, cultural heritage, water resources and landscape); careful route selection and legislative compliance would be required in order to ensure that effects are mitigated. Under this option existing and planned walkways and greenways of local authorities could be integrated into the route.

In addition to the above, Fáilte Ireland identified that this option would constitute a significant level of new development in terms of cycleways and, therefore, presented a barrier to the launch of the brand in 2014 (on-road cycling routes would not satisfy the needs or expectations of Ireland's core overseas markets). Other issues identified included land ownership and the possible requirement to seek planning permission, neither of which were insurmountable in principal, but not within the timescale allowed. It is noted that the Operational Programme supports improvements by local authorities and others to the existing level of infrastructure and facilities for walking, cycling and water-based activities along the Wild Atlantic Way.

Once it was decided that the first manifestation of the Wild Atlantic Way brand would be a branding of the existing roads along the west coast from County Donegal to County Cork, a further two sub-options (3b and 3c) were considered.

### **Option 3b: Most Scenic Driving Routes only**

By only including roads that are most scenic or which have largely unbroken views of the coast this option would contribute towards the intensification of visitors in already popular areas.

The Programme for this option would present an opportunity to contribute towards improvements in environmental management and protection; however this opportunity would be constrained to some degree by focusing visitors into already popular areas where the roads are most scenic or have unbroken coastal views. Some management of visitors would be possible at a macro spatial level (in terms of what areas and roads could accommodate increases in visitors) and at a micro spatial level (in terms of what areas adjacent to viewing points, lay-bys etc. should be avoided). This option would allow for some management of visitors across the tourist season so that growth could be sought in times outside of the summer peak.

The above management of visitors would have the potential to both: contribute towards the protection of sensitive environments (including ecology, water resources, landscapes and cultural

heritage) by reducing potential stresses in some areas; and reduce increases in infrastructural demand during the summer peak season.

Visitors would be directed to roads that are most scenic or which have largely unbroken views of the coast (in already popular areas). This may lead to the need to develop viewing points and associated developments – potentially including new and improved access roads. The construction of these new developments would present potential adverse environmental effects. Focusing growth could result in significant increases in pressure upon sensitive environments (including ecology, water resources, landscapes and cultural heritage) and increases in demand on infrastructure, leading to direct, indirect and cumulative environmental effects in these locations.

In addition to the above, Fáilte Ireland identified that this option might only serve to intensify visitors in already popular areas and might not achieve one of the goals of the initiative, namely to spread visitor bed nights and revenue into areas where there is under-utilised capacity.

### **Option 3c: Single, Continuous Route<sup>13</sup>**

This option maximises the use existing infrastructure as the route would be aligned to existing roads only.

With a route extending along the entire western seaboard (and with the prospect of including a number of loops inland off the main spine within the first five years of operation), the Programme for this option would present an opportunity to contribute towards improvements in environmental management and protection by allowing for both: the management of visitors at a macro spatial level (in terms of what sections of the western seaboard could accommodate increases in visitors); and the management of visitors at a micro spatial level (in terms of what areas adjacent to viewing points, lay-bys etc. should be avoided). This option would also allow for the management of visitors across the tourist season so that growth could be sought in times outside of the summer peak. There would be potential for success in this regard due to the wide extent of the route.

The above management of visitors would have the potential to both: contribute towards the protection of sensitive environments (including ecology, water resources, landscapes and cultural heritage) by minimising potential stresses; and avoid increases in infrastructural demand during the summer peak season.

Road capacity and safety were key criteria for this option: roads for this option had to already have the capacity to take two-way car, camper van and minibuss traffic, and separate sections of the route were identified for coaches, as appropriate. By using existing roads for this option which do not need to be upgraded, potential adverse effects would be avoided.

Within Option 3c 'Single, Continuous Route' there are three sub-options for the provision of Discovery Points (viewing points and lay-bys) as follow:

#### **3c (i) No Discovery Points, continuation of uncoordinated tourism projects**

The option allows for the continuation of new, uncoordinated tourism projects along the western seaboard undertaken by a variety of local groups, private landowners and local authorities. This would result in the proliferation of viewing points, lay-bys and a variety of associated developments along the entirety of the route.

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<sup>13</sup> The delineation of the Wild Atlantic Way Route under this alternative was informed by a Route Identification process, the findings of which were included in a "WAW (Initial) Route Identification Report" (2013, Hogarts on behalf of Fáilte Ireland). Road capacity and safety were key criteria considered in the identification of the Route. The following lists the groups of criteria taken into account in the identification of the route:

1. Accessibility and Capacity of the Route
2. Scenic Quality of the Route
3. Points of Interest along the Route
4. Human Influences
5. Culture
6. Sports and Activities

Impacts and mitigation would not be considered for these projects along the western seaboard as a whole, only on a case by case basis where works are part of formal consenting procedures.

This lack of coherent planning and management would have the potential to:

- Contribute towards increasing stresses on sensitive environments (including ecology, water resources, landscapes and cultural heritage); and
- Reduce the effectiveness of visitor management and associated positive effects on the management and protection of the environment.

### **3c (ii) New Discovery Points**

This option facilitates a coordinated set of new Discovery Points along the route.

Impacts and mitigation could be considered along the western seaboard as a whole, through the SEA, as well as at lower tiers of environmental assessment and decision making.

The development of new Discovery Points would have the potential to adversely affect environmental sensitivities such as those relating to ecology, water resources, landscapes and cultural heritage. Such effects could be mitigated through the SEA process.

The coordination would have the potential to maximise the effectiveness of visitor management and associated positive effects on the management and protection of the environment.

### **3c (iii) Restriction of new development, Limit in number of Discovery Points**

This option facilitates a restriction of new development and limits the number of Discovery Points. There is an emphasis on re-use and reinforcement of existing infrastructure and there is an application of design guidelines to contribute towards the protection of the environment.

New works, e.g. reuse and reinforcement, at existing Discovery Points would have the potential to adversely affect environmental sensitivities such as those relating to ecology, water resources, landscapes and cultural heritage. Such effects could be mitigated through the SEA process including the application of design guidelines.

Impacts and mitigation could be considered along the western seaboard as a whole, through the SEA, as well as at lower tiers of environmental assessment and decision making.

The coordination provided for by this option would have the potential to maximise the effectiveness of visitor management and associated positive effects on the management and protection of the environment.

## **4.2.6 The Selected Alternative**

The option selected for the development of the Operational Programme comprises: 3c: Single, Continuous Route; (iii) Restriction of new development, Limit in number of Discovery Points<sup>14</sup>

This alternative is one of the options which would improve the protection and management of the environment, as well as having the least extent of potential adverse effects (see summary on Table 4.1). By complying with appropriate mitigation measures - including those which have been integrated into the Operational Programme – potentially significant adverse environmental effects which could arise as a result of implementing the Programme would be likely to be avoided, reduced or offset. Residual adverse environmental effects would be non-significant.

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<sup>14</sup> It is noted that the objectives at the core of Option 3a will also be implemented over time – these have been assessed in this section and related provisions have been assessed in the main SEA Environmental Report.

**Table 4.1 Summary of Effects of Implementing the Operational Programme**

<b>Environmental Component</b>	<b>Significant Positive Effect Likely to Occur</b>	<b>Potentially Significant Adverse Effect, If unmitigated</b>	<b>Residual Non-Significant Adverse Effect</b>
<b>Biodiversity and flora and fauna</b>	<ul style="list-style-type: none"> <li>Visitor management strategy will contribute positively to advancing the attainment of conservation objectives along and adjacent to the route and existing candidate Discovery Points, thereby benefitting the management of designated sites.</li> <li>Continuation of and further contribution towards the protection of biodiversity and flora and fauna, including ecological connectivity, by: using existing routes, viewing points and lay-bys instead of developing new infrastructure; and contributing towards compliance with environmental legislation by local authorities</li> <li>Providing management material [evidence, monitoring and guidelines] to assist in the implementation of management plans for designated habitats and to assist in achieving the conservation objectives of these relevant management plans for such sites and habitats.</li> </ul>	<ul style="list-style-type: none"> <li>Arising from both construction (including reuse and reinforcement of existing viewing points and lay-bys) and operation: loss of/damage to biodiversity in designated sites, ecological connectivity and non-designated habitats; and disturbance to biodiversity and flora and fauna</li> <li>Habitat loss, fragmentation and deterioration, including patch size and edge effects</li> <li>Disturbance and displacement of protected species and coastal squeeze</li> </ul>	Loss of an extent of non-protected habitats arising from the replacement of semi-natural land covers with artificial surfaces
<b>Population and human health</b>	<ul style="list-style-type: none"> <li>Contribution towards the protection of human health as a result of protection of environmental vectors</li> </ul>	<ul style="list-style-type: none"> <li>Potential interactions if effects upon environmental vectors such as water are not mitigated</li> </ul>	None
<b>Soil</b>	<ul style="list-style-type: none"> <li>Continuation of and further contribution towards the protection of hydrogeological and ecological function of the soil resource by: using existing routes, viewing points and lay-bys instead of developing new infrastructure; and contributing towards compliance with environmental legislation by local authorities</li> </ul>	<ul style="list-style-type: none"> <li>Adverse impacts on the hydrogeological and ecological function of the soil resource</li> </ul>	Loss of an extent of soil function arising from the replacement of semi-natural land covers with artificial surfaces
<b>Water</b>	<ul style="list-style-type: none"> <li>Continuation of and further contribution towards the protection of water resources by: using existing routes, viewing points and lay-bys instead of developing new infrastructure; and contributing towards compliance with environmental legislation by local authorities</li> </ul>	<ul style="list-style-type: none"> <li>Adverse impacts upon the status of water bodies and entries to the WFD Register of Protected Areas, arising from changes in quality, flow and/or morphology</li> </ul>	Flood related risks remain due to uncertainty with regard to extreme weather events
<b>Air and climatic factors</b>	<ul style="list-style-type: none"> <li>None at strategic alternative level however potential improvements in walking and cycling levels in the long-term.</li> </ul>	<ul style="list-style-type: none"> <li>Failure to contribute towards sustainable transport and associated impacts (energy usage and emissions to air including noise and greenhouse gases)</li> </ul>	Increases in greenhouse gas emissions however existing and planned walkways and greenways of local authorities could be integrated into the route overtime
<b>Material Assets</b>	<ul style="list-style-type: none"> <li>Improvement in use of existing routes, viewing points and lay-bys instead of developing new infrastructure</li> <li>Visitor management allows for growth outside of the summer peak (thereby benefitting the provision of water services).</li> </ul>	<ul style="list-style-type: none"> <li>The need to provide adequate and appropriate water services (it is the function of Irish Water to provide for such needs)</li> <li>Increases in waste levels</li> </ul>	Residual wastes to be disposed of in line with higher level waste management policies
<b>Cultural Heritage</b>	<ul style="list-style-type: none"> <li>Continuation of and further contribution towards the protection of cultural heritage by: using existing routes, viewing points and lay-bys instead of developing new infrastructure; and contributing towards compliance with environmental legislation by local authorities</li> </ul>	<ul style="list-style-type: none"> <li>Potential effects on protected and unknown archaeology and protected architecture arising from construction and operation</li> </ul>	Potential alteration to the context and setting of designated architectural and archaeological heritage however these will occur in compliance with legislation. Potential loss of unknown archaeology however this loss will be mitigated by measures integrated into the Programme
<b>Landscape</b>	<ul style="list-style-type: none"> <li>Continuation of and further contribution towards the protection of landscape designations by: using existing routes, viewing points and lay-bys instead of developing new infrastructure; and contributing towards compliance with environmental legislation by local authorities</li> </ul>	<ul style="list-style-type: none"> <li>Occurrence of adverse visual impacts and conflicts with the appropriate protection of statutory designations relating to the landscape</li> </ul>	Minimal residual adverse effects

## Section 5 Monitoring Measures

### 5.1 Introduction

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This section details the measures which will be used in order to monitor the likely significant effects of implementing the Operational Programme.

Monitoring can enable, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action.

Central to the Monitoring Programme will be the establishment of a Monitoring Group. This establishment is provided for by the Operational Programme on foot of submissions from various environmental authorities including the National Parks and Wildlife Service and the Environmental Protection Agency. The establishment of the Monitoring Group is to ensure that robust systems are in place, in appropriate existing authorities, to ensure that all key commitments made at the Programme level will be delivered effectively (including at the appropriate time), and to ensure that no adverse effects on the integrity of the environment will result.

### 5.2 Updating Monitoring Measures

Monitoring is an ongoing process. The measures identified for monitoring in this section will be further refined when the findings of the Monitoring Strategy for Operational Programme candidate Signature Discovery Points emerge. This Monitoring Strategy is included as an Appendix to the Operational Programme.

The Monitoring Strategy contains three elements or levels of monitoring, as follows:

1. Macro monitoring of Regional/County visitor numbers and associated level effects caused by the visitor contributions to loadings on

transportation, waste and water infrastructure;

2. Site Surveys of visitor behaviour to describe general activities and associated environmental effects of visitors (including impacts on wildlife, vegetation, monuments and site features); and
3. Site Surveys to describe the specific effects on the ecology of areas that were observed to have been used/trafficked by visitors.

The Environmental Survey and Monitoring Strategy intends to produce data relating to:

- Movement patterns of visitors at sites along the route;
- Variations in visitor/traffic numbers;
- Water quality effects at tourism settlements along the route;
- Increases in tourism related planning applications;
- Patterns of visitor activity, movement and behaviour at candidate Signature Discovery Points and control sites;
- An indication of types of impacting activities at candidate Signature Discovery Points and control sites;
- An indication of extent of ecological effect zones around candidate Signature Discovery Points and control sites; and
- The need and type mitigation responses.

### 5.3 Indicators and Targets

Monitoring is based around indicators which allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives identified in the SEA Environmental Report and used in the evaluation. Each indicator to be monitored is accompanied by the target(s) which were identified with regard to the relevant strategic actions.

Table 5.1 overleaf shows the indicators and targets which have been selected for monitoring the likely significant environmental

effects of implementing the Programme, if unmitigated.

Monitoring is an ongoing process and targets and indicators will be further refined when the findings of the Monitoring Strategy (see Section 5.2) for Operational Programme candidate Signature Discovery Points emerge. The Monitoring Programme may also be updated to deal with specific environmental issues - including unforeseen effects - as they arise.

Many of the indicators below relate to more than one of the marine, freshwater and terrestrial environments, for example: indicator B1 'Conservation status of habitats and species as assessed under Article 17 of the Habitats Directive' relates to marine, freshwater and terrestrial habitats and species; and indicator W1 'To maintain and improve, where possible, the quality and status of surface waters' relates to coastal and estuarine waters as well as rivers.

## 5.4 Sources

Measurements for indicators generally come from existing monitoring sources. Existing monitoring sources include those maintained by the relevant authorities e.g. local authorities, the Environmental Protection Agency, the National Parks and Wildlife Service and the Central Statistics Office.

Where significant effects - including positive, negative, cumulative and indirect - have the potential to occur upon environmental components as a result of the undertaking of individual projects or multiple individual projects such instances should be identified and recorded by local authorities and others and should feed into the monitoring evaluation.

## 5.5 Reporting

There will be mid-term review of the Operational Programme. A stand-alone Monitoring Report on the significant environmental effects of implementing the Operational Programme will be prepared in advance of this review and in advance of the 5 year review. These reports will address the indicators set out below which may be refined when the findings of the Monitoring Strategy

(see Section 5.2) for Operational Programme candidate Signature Discovery Points emerge.

Fáilte Ireland will coordinate 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. Input will be sought from local authorities and others with respect to lower tier environmental assessment and decision making undertaken.

## 5.6 Thresholds and Corrective Action

The occurrence of persistent significant adverse environmental effects which are directly attributable to tourism would necessitate consideration of the effects in the context of the OP and a possible review of part(s) of the OP.

The route and the candidate Discovery Points may change if the Monitoring Strategy produces results that show that visitor activity and/or visitor intensification is predicted or observed to result in a negative impact on the environment in particular locations. For this reason, a mid-term review of the route and the candidate Discovery Points has been built into the Operational Programme. Changes that could be made include the de-marketing of candidate Discovery Points, the removal of signage and the temporary or permanent removal of candidate Discovery Points from the route.

Examples of where consultation with local authorities and others and the possible coordination of corrective action may be required include:

- Complaints received from statutory consultees regarding avoidable impacts on any environmental components resulting from development which is granted permission under the Programme;
- Court cases taken by the Department of Arts, Heritage and the Gaeltacht regarding impacts upon archaeological heritage from development which is granted permission under the Programme;

- Failure to meet bathing water Mandatory Values directly attributable to tourism;
- Fish kills directly attributable to tourism; and
- Boil notices on drinking water directly attributable to tourism.



**Table 5.1 Selected Indicators, Targets and Monitoring Sources**

<b>Environmental Component</b>	<b>Current Indicators</b> (subject to review of findings from Monitoring Strategy for Operational Programme candidate Signature Discovery Points)	<b>Current Target(s)</b> (subject to review of findings from Monitoring Strategy for Operational Programme candidate Signature Discovery Points)	<b>Source (Frequency)</b>
<b>Biodiversity, Flora and Fauna</b>	B1: Conservation status of habitats and species as assessed under Article 17 of the Habitats Directive	B1: Maintenance of favourable conservation status for all habitats and species protected under National and International legislation to be unaffected by implementation of the Programme <sup>15</sup>	<ul style="list-style-type: none"> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>• Department of Arts, 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)</li> <li>• Department of Arts, Heritage and the Gaeltacht's National Monitoring Report for the Birds Directive under Article 12 (every 3 years)</li> <li>• Consultations with the NPWS (at monitoring evaluation - see Section 5.5)</li> </ul>
	B2: Percentage loss of functional connectivity without remediation resulting from development provided for by the Programme	B2: No significant ecological networks or parts thereof which provide functional connectivity to be lost without remediation resulting from development provided for by the Programme	<ul style="list-style-type: none"> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• Review of permissions granted and the SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>• CORINE mapping resurvey (every c. 5 years)</li> <li>• Review of EPA Ecological Network Mapping (if available)</li> </ul>
	<p>B3i: Number of significant impacts on relevant habitats, species, environmental features or other sustaining resources in designated sites including Wildlife Sites resulting from development provided for by the Programme</p> <p>B3ii: Number of significant impacts on the protection of listed species</p>	<p>B3i: Avoid significant impacts on relevant habitats, species, environmental features or other sustaining resources in designated sites including Wildlife Sites resulting from development provided for by the Programme</p> <p>B3ii: No significant impacts on the protection of listed species</p>	<ul style="list-style-type: none"> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• Review of permissions granted and the SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>• Consultations with the NPWS (at monitoring evaluation - see Section 5.5)</li> </ul>

<sup>15</sup> Except as provided for in Section 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.

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<b>Population and Human Health</b>	PHH1: Occurrence (any) of a spatially concentrated deterioration in human health arising from environmental factors resulting from development provided for by the Programme, 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 of implementing the Programme	<ul style="list-style-type: none"> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• Consultations with EPA and Health Service Executive (at monitoring evaluation - see Section 5.5)</li> </ul>
<b>Soil</b>	S1: Soil extent and hydraulic connectivity	S1: To minimise reductions in soil extent and hydraulic connectivity	<ul style="list-style-type: none"> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• Review of permissions granted and the SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> </ul>
<b>Water</b>	W1i: Classification of Overall Status (comprised of ecological and chemical status) under the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (SI No. 272 of 2009)	W1i: Not to cause deterioration in the status of any surface water or affect the ability of any surface water to achieve 'good status' <sup>16</sup> by 2015	<ul style="list-style-type: none"> <li>• Lower tier environmental assessment and decision making by local authorities.</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>• Data issued under the Water Framework Directive Monitoring Programme for Ireland (multi-annual)</li> <li>• EPA <i>The Quality of Bathing Water in Ireland</i> reports</li> </ul>
	W1ii: Mandatory and Guide values as set by the EU Bathing Water Directive and transposing Bathing Water Quality Regulations (SI No. 79 of 2008)	W1ii: To achieve - as a minimum - Mandatory values and, where possible, to achieve Guide values as set by the EU Bathing Water Directive and transposing Bathing Water Quality Regulations (SI No. 79 of 2008)	
	W2: Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC	W2: Not to affect the ability of groundwaters to comply with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC	<ul style="list-style-type: none"> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>• Data issued under the Water Framework Directive Monitoring Programme for Ireland (multi-annual)</li> </ul>
	Compliance of lower tier assessments and decision making by local authorities with the Flood Risk Management Guidelines	W3: For all lower tier assessments and decision making by local authorities to comply with the Flood Risk Management Guidelines	<ul style="list-style-type: none"> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> </ul>
<b>Air and Climatic Factors</b>	C1: Percentage of population using the Wild Atlantic Way travelling by non-mechanical means	C1: To contribute towards an increase in the percentage of the population using the Wild Atlantic Way travelling by non-mechanical means	<ul style="list-style-type: none"> <li>• Internal Fáilte Ireland monitoring</li> </ul>

<sup>16</sup> Good status as defined by the WFD equates to approximately the following in the current national schemes of classification as set out by the EPA:

- *Q4* in the biological classification of *rivers*;
- *Mesotrophic* in the trophic classification of lakes, as set out by the EPA;
- *Unpolluted status* in the Assessment of Trophic Status of Estuaries and Bays in Ireland (ATSEBI).

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<b>Material Assets</b>	M1: Number of Wild Atlantic Way developments granted permission which can be adequately and appropriately served with waste water treatment, if required	M1: All new Wild Atlantic Way developments granted permission which can be adequately and appropriately served with waste water treatment, if required	<ul style="list-style-type: none"> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> </ul>
	M2: Number of non-compliances with the 48 parameters identified in the European Communities (Drinking Water) Regulations (No. 2) 2007 which present a potential danger to human health as a result of implementing the Programme	M2: No non-compliances with the 48 parameters identified in the European Communities (Drinking Water) Regulations (No. 2) 2007 which present a potential danger to human health as a result of implementing the Programme	<ul style="list-style-type: none"> <li>• EPA The Provision and Quality of Drinking Water in Ireland reports (multi-annual)</li> <li>• EPA Remedial Action List (every quarter)</li> </ul>
	M3: Preparation and implementation of construction and environmental management plans	M3: For construction and environmental management plans to be prepared and implemented for relevant projects	<ul style="list-style-type: none"> <li>• Internal examination of compliance with SEA and lower tier assessment mitigation measures</li> </ul>
	M4: Percentage length of the Wild Atlantic Way route aligned to existing infrastructure	M4: To maximise the length of Wild Atlantic Way route developed along existing infrastructure, taking into account other factors such as environmental protection and planning considerations	<ul style="list-style-type: none"> <li>• Internal identification of percentage length of the Wild Atlantic Way route aligned to existing infrastructure</li> </ul>
<b>Cultural Heritage</b>	CH1: Percentage of entries to the Record of Monuments and Places - including Zones of Archaeological Potential (and the context of the above within the surrounding landscape where relevant) - protected from significant adverse effects arising from development of the Wild Atlantic Way	CH1: Protect entries to the Record of Monuments and Places - including Zones of Archaeological Potential (and their context of the above within the surrounding landscape where relevant) from significant adverse effects arising from development of the Wild Atlantic Way	<ul style="list-style-type: none"> <li>• Review of permissions granted and the Lower tier environmental assessment and decision making by local authorities</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>• Consultation with Department of Arts, Heritage and the Gaeltacht (at monitoring evaluation - see Section 5.5)</li> </ul>
	CH2: Percentage of entries to the Records of Protected Structures and Architectural Conservation Areas and their context protected from significant adverse effects arising from development of the Wild Atlantic Way	CH2: Protect entries to the Records of Protected Structures and Architectural Conservation Areas and their context from significant adverse effects arising from development of the Wild Atlantic Way	<ul style="list-style-type: none"> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> <li>• Consultation with Department of Arts, Heritage and the Gaeltacht (at monitoring evaluation - see Section 5.5)</li> </ul>
<b>Landscape</b>	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 local authorities	L1: No unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in the land use plans of local authorities	<ul style="list-style-type: none"> <li>• Lower tier environmental assessment and decision making by local authorities</li> <li>• SEA Monitoring Programme reports for the land use plans of relevant local authorities (as required, monitoring reports published on various timescales and frequencies)</li> </ul>