

# Cliff Coast Draft Destination and Experience Development Plan SEA Environmental Report Non- Technical Summary

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## Glossary

### Appropriate Assessment

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 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.

### Biodiversity and Flora and Fauna

Biodiversity is the variability among living organisms from all sources including inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species and of ecosystems' (United Nations Convention on Biological Diversity 1992).

Flora is all of the plants found in a given area.

Fauna is all of the animals found in a given area.

### Environmental Problems

Annex I of Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27th June 2001, on the assessment of the effects of certain Plans and programmes on the environment (the Strategic Environmental Assessment Directive) requires that information is provided on 'any existing environmental problems which are relevant to the plan or programme', thus, helping to ensure that the proposed strategic action does not make existing environmental problems worse.

Environmental problems arise where there is a conflict between current environmental conditions and ideal targets. If environmental problems are identified at the outset they can help focus attention on important issues and geographical areas where environmental effects of the plan or programme may be likely.

### Environmental Vectors

Environmental vectors are environmental components, such as air, water or soil, through which contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings.

### Mitigation Measures

Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing a human action, be it a plan, programme or project. Mitigation involves ameliorating significant negative effects. Where there are significant negative effects, consideration should be given in the first instance to preventing such effects or, where this is not possible, to lessening or offsetting those effects.

### Protected Structure

Protected Structure is the term used in the Planning and Development Act and Regulations (as amended) to define a structure included by a planning authority in its Record of Protected Structures. Such a structure shall not be altered or demolished in whole or part without obtaining planning permission or confirmation from the planning authority that the part of the structure to be altered is not protected.

#### **Recorded Monument**

A monument included in the list and marked on the map which comprises the Record of Monuments and Places that is set out County by County under Section 12 of the National Monuments (Amendment) Act, 1994 by the Archaeological Survey of Ireland. The definition includes Zones of Archaeological Potential in towns and all other monuments of archaeological interest which have so far been identified. Any works at or in relation to a recorded monument requires two months' notice to the former Department of the Environment, Heritage and Local Government (now Department of Arts, Heritage and the Gaeltacht) under Section 12 of the National Monuments (Amendment) Act, 1994.

#### **SEA (Strategic Environmental Assessment)**

Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt it.

#### **SEA Scoping**

Scoping is the process of determining what issues are to be addressed, and setting out a methodology in which to address them in a structured manner appropriate to the plan or programme. SEA coping is carried out in consultation with appropriate environmental authorities.

#### **Strategic Actions**

Strategic actions include: Policies / Strategies, which may be considered as inspiration and guidance for action and which set the framework for Plans and programmes; Plans, sets of coordinated and timed objectives for the implementation of the policy; and Programmes, sets of projects in a particular area.

#### **Strategic Environmental Objective (SEO)**

Strategic Environmental Objectives (SEOs) are methodological measures developed from policies which generally govern environmental protection objectives established at international, Community or Member State level and are used as standards against which the provisions of the Masterplan and the alternatives can be evaluated in order to help identify which provisions would be likely to result in significant environmental effects and where such effects would be likely to occur, if - in the case of adverse effects – unmitigated

## 1 Introduction

### 1.1 Overview

An Environmental Report of the Strategic Environmental Assessment (SEA) for the Draft Cliff Coast Destination & Experience Development Plan (hereafter referred to the 'Plan' or the 'CCDEDP') has been prepared to comply with the provisions of Article 12 of S.I. 435 of 2004 – European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations – as amended by S.I. 200 of 2011 – European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011.

This document is a non-technical summary (NTS) of the SEA Environmental Report (ER). It shall endeavour, insofar as possible, to present a condensed summary of the ER, using non-technical terms, but without omitting or understating any environmental effects of note.

The Environmental Report and NTS, which should be read in conjunction with the CCDEDP, has been prepared by Brady Shipman Martin, environmental, planning and landscape consultants, on behalf of Fáilte Ireland, the National Tourism Development Authority.

### 1.2 Destination & Experience Development Plans

A Destination & Experience Development Plan (DEDP) is a five year commercial destination and experience development plan prepared for an area.

The CCDEDP is focused on an area extending from Tralee across North Kerry to Loop Head Peninsula and Spanish Point in West Clare. The CCDEDP has been developed through a programme of research and consultation incorporating the views of visitors, the tourism industry, local community and a programme of international benchmarking. The objective of the CCDEDP is to achieve growth in revenue to return to 2019 levels of tourism income by 2026.

### 1.3 Strategic Environmental Assessment

Strategic Environmental Assessment (SEA) stems from *Directive 2001/42/EC*<sup>1</sup> (the 'SEA Directive') of the *European Parliament and of the Council of Ministers on the assessment of the effects of certain plans and programmes on the environment*. Article 1 of the Directive states that:

*“The objective of this directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.”*

In effect, SEA comprises a systematic assessment process of predicting and evaluating the 'likely significant environmental effects' of implementing a proposed plan or programme, before a decision is made to adopt the plan or programme. The overall aim of SEA is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development.

The SEA Directive was transposed into Irish law through two Statutory Instruments (S.I.):

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<sup>1</sup>SEA Directive: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN>

- S.I. No. 435 of 2004 *The European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004*, as amended by S.I. No. 200 of 2011 *The European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011*; and
- S.I. No. 436 of 2004 *Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2004*, as amended by S.I. No. 201 of 2011 *The Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011*.

The former regulations, (S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011), relate to SEA as it applies to plans or programmes prepared for “agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism and town and country planning or land use”, and these provisions are applicable to the CCDEDP as a tourism sector plan.

The latter regulations (S.I. No. 436 of 2004 as amended by S.I. No. 201 of 2011) relate to SEA as it applies to plans or programmes where the context requires, “a development plan, a variation of a development plan, a local area plan (or an amendment thereto), regional planning guidelines or a planning scheme”, and are not applicable to the CCDEDP.

#### 1.4 The Requirement for Strategic Environmental Assessment of the Plan

Article 3(2) of the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes:

- a) *which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use and which set the framework for future development consent of projects listed in Annexes I and II to the EIA Directive<sup>2</sup>, or*
- b) *which, in view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of the 92/43/EEC (Habitats Directive)<sup>3</sup> i.e. requires that SEA is undertaken where Stage 2 Appropriate Assessment is being undertaken on the plan or programme.*

The Cliff Coast Destination and Experience Development Plan is a non-statutory tourism sector plan that does not set the framework for future development consent of projects listed in Annexes I and II to the EIA Directive and does not contain provisions or define rules that must be complied with when consent of other projects is being granted. Therefore, SEA of the CCDEDP is not required under Article 3(2)(a) above of the SEA Directive.

The Draft Plan does, however, fall under the definition of a “plan” contained within the *Birds and Natural Habitats Regulations 2011 (as amended)* and therefore, must be screened for the requirement to undertake Appropriate Assessment (AA) in accordance with Article 6(3) of the Habitats Directive (92/43/EC). The Screening for AA (BSM, 2024) has found that the Plan has the potential, if unmitigated, to affect the ecological integrity of European sites and that measures to ensure that potential effects

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<sup>2</sup> Directive 2011/92/EU, as amended by Directive 2014/52/EU of the European Parliament and of the Council, *on the assessment of the effects of certain public and private projects on the environment*

<sup>3</sup> Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora



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are avoided are required. Therefore, in accordance with Article 3(2)(b) above and guidance provided in SEA Circular Letter SEA 1/08 & NPWS 1/08<sup>4</sup>, a SEA of the CCDEDP has been undertaken.

The Environmental Report provides the findings of the SEA and takes account of recommendations contained in submissions from the Environmental Authorities. On finalisation of the Plan, an SEA Statement will be prepared, summarising, *inter alia*, how environmental considerations have been integrated into the Plan.

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<sup>4</sup> <https://www.npws.ie/sites/default/files/general/circular-sea-01-08.pdf>

## 2 Outline Description of the Plan

### 2.1 Introduction

The Cliff Coast Destination and Experience Development Plan (CCDEDP) is a five-year sustainable tourism development plan for North Kerry and West Clare. It is focused on an area extending from Tralee across North Kerry to Loop Head Peninsula and Spanish Point in West Clare. The CCDEDP focuses on sustainability and responsible tourism. Over the term of the plan, it will grow the number of experiences available to visitors through a number of destination projects designed to create long term destination differentiation for the Cliff Coast.

The Plan provides an opportunity to ensure that all existing and future tourism projects and initiatives within the Cliff Coast Destination and Experience Development Plan area are planned, developed and managed in a sustainable and integrated manner. The VICE (Visitor, Industry, Community and Environment) Model for Sustainable Tourism is the approach the CCDEDP is developed from and strives to implement.

The framework for the CCDEDP has identified two unifying ideas that link a series of projects to generate a more significant economic impact for North Kerry and West Clare. The destination development themes of 'Bays and Ways of Adventure' (expanding the activity base) and 'Responsible Innovation' (sustainability at the core of all experiences) will build on investment in current and future outdoor infrastructure through sustainable tourism innovation and the area's coastal and rural built and natural heritage, tourism assets and trails. The green and blue spaces of the Cliff Coast provide the focus for tourism enterprise and experience development. The CCDEDP approach will capitalise on the opportunities provided by recent and future product investment while increasing the supply of saleable experiences for the visitor to engage with.

The CCDEDP was developed through a programme of stakeholder consultation and research, reflecting the views of visitors, the local tourism industry and the wider community. In assessing the international destination opportunity for the Cliff Coast, a programme of international benchmarking was also conducted.

The key objectives of the plan are:

- *Ensure local experiences are brought to life through the development of the optimal mix of hero and ancillary tourism products that attract visitors and retain them for longer in the destination.*
- *Unlock the economic growth potential of an area by progressing a range of key initiatives that will motivate tourists to explore the wider destination.*
- *Develop a sustainable basis for commercial tourism development centred on creating strong signature, supporting and ancillary experiences that are commoditised through the creation of saleable experiences that excite consumers and buyers alike.*
- *Create the conditions to attract leisure visitors on a year-round basis to North Kerry and West Clare to immerse themselves actively in the community, interacting with local people.*
- *Strengthen the value of tourism to the local community by providing sustainable employment opportunities.*

Furthermore, four strategic development outcomes have been identified to influence the tourism industry's product and experience development in the CCDEDP. These four development outcomes will ensure a coordinated approach to destination experience development aligned with the opportunities identified through the plan and future product investment and experience priorities. The four outcomes are as follows:

- *Navigating Adventure - Sustainable engagement with the outdoor environment through activities and slow adventure on water and land.*
- *Coastal Heritage - Guiding Lights - Access the unique maritime heritage of the Cliff Coast, conquests and journeys across its coastline and the mouth of the estuary.*
- *Immersive Sustainability - Develop visitor experiences that exceed new expectations around responsible travel by embracing sustainability as the basis for destination and experience innovation.*
- *Restorative Tourism - Develop a distinctive form of Irish wellbeing across the Cliff Coast through sustainable rural, restorative and nature based experiences.*

## 2.2 Vision

The Destination Vision for CCDEDP 2033 is:

*“The Cliff Coast is recognised as a leader in sustainable tourism where visitors clearly understand their role in contributing to community wellbeing and responsible tourism. The striking coastline is renowned for its cliff top walks and soul stirring views of a cliff coast brought alive through its vibrant communities and the opportunity to sample the best of local culture and traditional music. It is a leading family destination where the visitor has access to great indoor attractions and outdoor activities. The quality of the outdoor activity product and coastal tourism adventure encourages slow adventure exploration with greenways acting as the link between the land and water adventure clusters in Tralee Bay and West Clare. Visitors have access to world class coastal tourism and marine experiences from dolphin watching to water activities linking our islands and coastal communities.”*

## 2.3 Strategic Objectives

The Plan is structured around the following strategic objectives:

- RTDS Strategic Objective 1: Grow the year-round appeal of the Wild Atlantic Way domestically and internationally ensuring we attract and disperse high value visitors into and throughout the region
- RTDS Strategic Objective 2: Raise the international profile of the Northern half of the Wild Atlantic Way to increase visitation and revenue.
- RTDS Strategic Objective 3: Increase tourism revenue, visitor dispersion and season extension across the Southern half of the Wild Atlantic Way
- RTDS Strategic Objective 4: Protect the authenticity and “wildness” of the Wild Atlantic Way
- RTDS Strategic Objective 5: Enable and assist the industry to grow its capacity and capability so that it can thrive over the period of this strategy
- RTDS Strategic Objective 6: Foster strong coalitions of industry and stakeholders with a common purpose in creating flourishing destinations and thriving communities.

The accompanying strategic objectives of the CCDEDP are set out in **Table 8.1** of this report.

## 2.4 Destination Catalyst Projects Overview

Nine projects have been identified as key destination development projects. They link areas and experiences within the destination, expand the range of things to do and see and encourage visitors to explore the wider area. They each contribute to achieving the destination transformation goals for the Cliff Coast i.e. Bays & Ways of Adventure (increase the activity base) and Responsible Innovation (sustainable tourism experience development). These destination development projects will be supported through additional projects necessary to ensure the tourism industry and local communities can avail of emerging opportunities.

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The catalyst projects and their objectives are as follows:

**Project 1 Cliff Coast Water Adventure Hub** - *A co-ordinated approach to developing the Cliff Coast as a water adventure and coastal activity hub of scale.*

**Project 2 Greenways** – *Maximise the investment in Greenways in North Kerry and West Clare for local communities and identify future Greenway projects to strengthen the network of trails that motivate visitors to explore new communities and local experiences.*

**Project 3 Visitor Hubs – Developing Key Towns** – *Develop the capacity of key destination towns to retain visitors in the area for longer by increasing the range of things to do and see during the day and evening time.*

**Project 4 Beach Management & Facilities** - *Employ a sustainable approach to the future management of beaches supported by the delivery of the visitor facilities that will support the outdoor activity and sustainability ambition of West Clare and North Kerry.*

**Project 5 Developing the Trails Network** - *Grow the network of coastal and rural trails through a sustainable development approach to create a national and international destination profile for the uniqueness of Cliff Coast trails and associated local experiences.*

**Project 6 Developing the Attractions Base** – *Loop Head Lighthouse, Vandeleur Walled Gardens, Scattery Island and Blennerville Heritage & Activity Centre - Maximise the capacity of existing attractions to attract and disperse visitors across the Cliff Coast through a new product and experience development approach for Loop Head Lighthouse, Vandeleur Walled Gardens, Scattery Island and the Blennerville Heritage and Activity Centre.*

**Project 7 Developing Digital Capacity** - *Develop the online and digital skills capacity of the Cliff Coast tourism industry.*

**Project 8 Accommodation Growth** - *Grow the accommodation base across West Clare and North Kerry.*

**Project 9 Transport Connectivity** - *Grow the sustainable transport options to attract visitors into and around the Cliff Coast destination.*

Underpinning these destination projects will be number of destination supporting projects (enablers) that will support the development of the tourism industry, local communities and other stakeholders. These are projects and supports that will enhance the destination's capacity to recover and achieve future growth. They also address the gaps that can strengthen the destination's ability to work towards achieving year-round visitor footfall. The destination supporting projects include improving industry capabilities, a focus on the family market, developing clusters and building on the rich culture of the region and its unique programme of festivals and events.

The destination supporting projects / enablers and their objectives are as follows:

**Enabler 1 Family Adventures** - *A destination wide approach to developing the Cliff Coast as Ireland's family destination.*

**Enabler 2 Industry Development** - *Increase the capacity of the tourism industry and local communities to attract visitors to the Cliff Coast through new levels of collaboration and experience development.*

**Enabler 3 Unique Events** - *Build on the portfolio of niche events across the Cliff Coast to create unique year round reasons to visit.*

**Enabler 4 Community Tourism** - *Provide the visitor with the opportunity to engage with our local communities by developing authentic heritage, cultural and local experiences to grow the value of tourism for the Cliff Coast communities as part of a sustainable tourism development approach.*

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**Enabler 5 Tourism Clusters** - *Develop a number of clusters within the Cliff Coast linked together by themes such as outdoor activity, heritage and culture or food and drink.*

The complete list of catalyst project and actions are provided and assessed in **Appendix 1** of the SEA Environmental Report .

### 3 Strategic Environmental Assessment

#### 3.1 Introduction

SEA is a process for evaluating, at the earliest appropriate stage, the environmental quality and consequences of Plans or Programmes (P/Ps). The purpose is to ensure that the environmental consequences of P/Ps are assessed both during their preparation and prior to their adoption. The SEA process also gives specified environmental authorities, interested parties and the general public, an opportunity to comment on the environmental impacts of the proposed P/P and to be kept informed during the decision-making process.

*Directive 2001/42/EC<sup>5</sup> on the assessment of the effects of certain plans and programmes on the environment* (the ‘SEA Directive’) requires EU Member States to assess the ‘likely significant environmental effects’ of plans and programmes prior to their adoption. This provides for the assessment of strategic environmental considerations at an early stage in the decision-making process.

The SEA process is designed to ensure that significant environmental effects arising from plans are:

- Properly identified and assessed;
- Subject to public participation;
- Taken into account by decision makers; and
- Regularly monitored.


The SEA Directive and SEA Regulations require that competent authorities determine whether the implementation of plans or programmes, or modifications thereof, will be likely to have significant effects on the environment. This determination process is referred to as an Environmental Assessment and defined as:

*“...the preparation of an environmental report, the carrying out of consultations, the taking into account of the environmental report and the results of the consultations in decision-making and the provision of information on the decision...”<sup>6</sup>*

#### 3.2 SEA Stages and Process

The key focus of SEA is to take environmental issues, and in particular ‘likely significant environmental effects’ of a P / P, into consideration during the plan or programme making process. The key stages in the SEA process as they relate to the CCDEDP are outlined in **Table 2.1** below.

**Table 2.1 Outline of the SEA Process**


Stage	Description	Status
1. Screening	<p>The requirement to undertake a SEA is mandatory for certain Plan / Programme (P / P). Where SEA is not a mandatory requirement, the P / Ps is subject to a ‘Screening process’, to consider if it is <i>likely to have significant effects</i> on the environment, and therefore, if SEA is required.</p> <p>The preparation of the <i>Draft CCDEDP</i> has been screened for Appropriate Assessment (AA) and it has been concluded that potential for effects on the integrity of European sites cannot be</p>	<p>Completed</p> 

<sup>5</sup> SEA Directive: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN>

<sup>6</sup> Article 2(b) of Directive 2001/42/EC, European Union, Article 2 (3) of EC (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 S.I No. 435 of 2004

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Stage	Description	Status
	<p>excluded beyond all reasonable scientific doubt and is required to undergo Appropriate Assessment.</p> <p>Therefore, in accordance with <i>Circular Letter SEA 1/08 &amp; NPWS 1/08</i> the <i>Draft CCDEDP</i> is also required to undergo a Strategic Environmental Assessment (SEA) in accordance with <i>Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment</i> (known as the SEA Directive).</p>	
2. Scoping	<p>Preparation of a SEA Scoping Report highlighting that the Environmental Report is required to include:</p> <ul style="list-style-type: none"> <li>■ methods of assessment;</li> <li>■ contents and level of detail in the Plan / Programme;</li> <li>■ the stage in the Plan or Programme-making process; and</li> <li>■ the extent to which certain matters are more appropriately assessed at different levels in the decision-making process in order to avoid duplication of environmental assessment.</li> </ul> <p>Scoping provides for consultation with the Environmental Authorities specified in Article 13 of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011, and the process allows for incorporation of the views of the environmental authorities within the P / P and the SEA Environmental Report.</p>	<p>Completed</p> 
3. Environmental Report	<p>Preparation of a systemic identification and evaluation of alternatives and assessment of the <i>likely significant environmental effects</i> of implementing the P / P.</p> <p>The findings of the assessment, which is carried out at various stages in the P / P making (<i>e.g.</i> Draft, Amended Draft <i>etc.</i>), are provided in the SEA Environmental Report in accordance with Article 12 (including Schedule 2) of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011.</p> <p>The output from this stage is an Environmental Report which accompanies the draft P / P required on public display.</p>	<p>Current Stage</p>
4. SEA Statement	<p>Completion / adoption of the Final CCDEDP, taking account of <i>likely significant environmental effects</i>, any submissions or observations received from consultations and integration of mitigation and monitoring measures within the Plan.</p> <p>The Environmental Report is concluded and an SEA Statement is prepared in accordance with Article 16(2)(b) of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011, summarising:</p> <ul style="list-style-type: none"> <li>■ how environmental considerations have been integrated into the Plan / Programme;</li> <li>■ how the environmental report, and any submissions /observations or consultations have been taken into account in the preparation of the Plan / Programme;</li> <li>■ the reasons for choosing the Plan / Programme in light of the other reasonable alternatives dealt with; and</li> <li>■ the measures decided for monitoring the significant environmental effects of implementation of the Plan / Programme.</li> </ul>	<p>Final (Future) Stage</p>

### 3.3 SEA Screening and Requirement for SEA

The requirement to undertake a SEA is mandatory for certain P / Ps that are above specified thresholds. Where SEA is not a mandatory requirement, the P / P is subject to a 'Screening process', (Stage 1) to consider if it is likely to have significant effects on the environment, and therefore, if SEA is required.

Screening for the purposes of SEA is defined as “*the determination of whether implementation of a P / P [Plan or Programme] would be likely to have significant environmental effects on the environment. The process of deciding whether a P / P [Plan or Programme] requires SEA.*”<sup>7</sup> The criteria for screening, i.e. determining whether a particular plan is likely to have significant environmental effects are set out in Annex II of the SEA Directive. These criteria are reproduced in Schedule 1 of S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011. The criteria are set out under two principal headings, each of which have a number of sub-criteria:

- Characteristics of a Plan / Programme; and
- Characteristics of the effects and of the area likely to be affected.

It is also noted that in accordance with Circular Letter SEA 1/08 & NPWS 1/08<sup>8</sup>, SEA for a P / P is also a mandatory requirement where the P / P requires Appropriate Assessment (AA) under Article 6(3) of the Habitats Directive (92/43/EEC).

The *Draft CCDEDP* has been screened for Appropriate Assessment (AA) in accordance with Article 6(3) of the *Habitats Directive* (92/43/EEC) and Regulation 42 of the *European Communities (Birds and Natural Habitats) Regulations 2011*, as amended. The AA Screening has concluded that potential for effects on the integrity of European sites cannot be excluded beyond all reasonable scientific doubt and therefore appropriate assessment and the preparation of a Natura Impact Statement (NIS) is required.

Therefore, in accordance with *Circular Letter SEA 1/08 & NPWS 1/08*<sup>9</sup> the Draft CCDEDP was also required to undergo Strategic Environmental Assessment (SEA) in accordance with *Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment*<sup>10</sup> (the *SEA Directive*).

### 3.4 SEA Scoping

Scoping allowed for consultation with the Environmental Authorities specified in Article 9(5) of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011 and for incorporation of the views of the Environmental Authorities within the Plan or Programme and the SEA Environmental Report.

The consultation was undertaken with the following Environmental Authorities specified in Article 9(5) of S.I. No. 435 of 2004, as amended, on 07 November 2023:

- Environmental Protection Agency (EPA);
- The Minister for Housing, Local Government and Heritage;
- The Minister for the Environment, Climate and Communications;
- The Minister for Agriculture, Food and the Marine; and
- Department of Tourim, Culture, Arts, Gaeltacht, Sport and Media.

<sup>7</sup> EPA: <http://www.epa.ie/pubs/advice/ea/SEA%20Pack%202018.pdf>

<sup>8</sup> <https://www.npws.ie/sites/default/files/general/circular-sea-01-08.pdf>

<sup>9</sup> <https://www.npws.ie/sites/default/files/general/circular-sea-01-08.pdf>

<sup>10</sup> DIRECTIVE 2001/42/EC: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN>



## Cliff Coast Draft Destination and Experience Development Plan

### SEA Environmental Report Non-Technical Summary

Submissions / observations on the scoping of the Environmental Report were received from the environmental authorities and comments have been incorporated into the Plan and Environmental Report as set out in **Table 3.1**.

Table 3.1 SEA Scoping Submissions / Observation from Environmental Authorities

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
<p><b>Department of Housing, Local Government and Heritage – Development Applications Unit (DAU)</b></p>	<p>The submission from DAU outlined heritage related observations and recommendations.</p> <p><u>Archaeology-</u></p> <p>The submissions notes that within the study area there are many recorded archaeological monuments, including national monuments of national significance. The range of archaeological monuments covered by the study area of the SEA may include:</p> <ul style="list-style-type: none"> <li>a) Sites and monuments included in the Sites and Monuments Record (SMR) as maintained by the National Monuments Service (NMS).</li> <li>b) Monuments and places included in the Record of Monuments and Places (RMP) as established under section 12 of the National Monuments (Amendment) Act 1994.</li> <li>c) Historic monuments and archaeological areas included in the Register of Historic Monuments as established under section 5 of the National Monuments (Amendment) Act 1987.</li> <li>d) National monuments subject to Preservation Orders under the National Monuments Acts 1930 to 2014 and national monuments which are in the ownership or guardianship of the Minister for Housing, Local Government and Heritage or a Local Authority.</li> <li>e) Archaeological objects within the meaning of the National Monuments Acts.</li> <li>f) Wrecks protected under the National Monuments Acts 1930 to 2014 or otherwise included in the Wreck Viewer maintained by the National Monuments Service.</li> <li>g) Archaeological features not as yet identified but which may be impacted on by any development.</li> </ul> <p><u>Protection of the Archaeological/Cultural Heritage-</u></p> <p>The submission suggests to consult the archaeological/cultural heritage addressed both in the Kerry County Development Plan 2022–2028 (Chapter 8), and Clare County Development Plan 2017–2023 (as extended, Chapter 15). It is advised to take full account of national policy on the protection of the archaeological heritage as set out in the <i>Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999)</i>.</p>	<p>The information and datasets provided have informed the preparation of the Draft Plan and the Environmental Report.</p>

Cliff Coast Draft Destination and Experience Development Plan

SEA Environmental Report Non-Technical Summary

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
	<p>The archaeological and cultural heritage of the study area shall be protected through ensuring preservation in-situ or preservation by record, as appropriate, with preservation in-situ being the first option to be considered being presumed to be the preferred option. If preservation in-situ cannot be achieved, or can only be achieved in-part, then preservation by record of the archaeological heritage will be required — this will require the full archaeological excavation and recording of the monument/site, according to best professional practice. Where excavation is required this shall also include the preparation of appropriate reports, post-excavation analyses and publications. Archaeological policies encompassing the forgoing are:</p> <ul style="list-style-type: none"> <li>- <i>To ensure that archaeological assessment is carried out in accordance with relevant policies and standards, in particular those set out in the Framework and Principles for the Protection of the Archaeological Heritage (Government of Ireland 1999) and the Policy and Guidelines on Archaeological Excavation (Government of Ireland 1999) and the advice in particular cases of the Department of Housing, Local Government and Heritage, with all relevant techniques (including documentary research, aerial photographic research, geophysical survey and archaeological test excavation) being required as appropriate. This will also include, in appropriate cases, the carrying out of building surveys and assessments of upstanding structures to determine the extent to which they are, or contain within them, structures of medieval or early modern date. Features of early modern date are also considered cultural heritage and it is noted that there are several World War II features in-and-around the Shannon Estuary which lies within the study area as outlined.</i></li> <li>- <i>To ensure that all such assessments are carried out by professionally qualified and experienced personnel.</i></li> </ul> <p><u>Climate Change Policies and Objectives for Archaeological Heritage-</u></p> <p>Archaeological monuments along the Atlantic seaboard within the study area are in particular risk of climate change and this should be referred to in any SEA. In this regard see Built &amp; Archaeological Heritage Climate Change Sectoral Adaptation on Plan Prepared under the National Adaptation Framework (Government of Ireland 2019).</p>	

## Cliff Coast Draft Destination and Experience Development Plan

### SEA Environmental Report Non-Technical Summary

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
	<p><u>Policy Context-</u></p> <p>The submission highlights that there are a number of key national policy documents pertaining to archaeology and built heritage, including Heritage Ireland 2030, the Built Vernacular Strategy (2021) and the National Policy on Architecture (pending). The Department also notes the symbiotic relationship between cultural heritage and biodiversity provides opportunities to build capacity as per the National Biodiversity plan 2017–2021 actions and to focus not just on protection but also on the conservation/restoration of diminishing or under threat cultural assets i.e. the archaeological and built heritage. Department notes the importance of new areas of interest including our built vernacular architecture and its setting both rural and urban, and the protection and potential of planned and designed landscapes for recreational and amenity purposes.</p> <p>The Department supports the opportunity for making cultural heritage more accessible and better integrated with wider tourism and recreational opportunities of the county. This will enhance and spread the tourism capacity through the county’s heritage sites and historic towns. The Department supports the integration and communication of multiple strands of cultural and natural heritage, particularly through the implementation of blue and green infrastructural projects that deal with all aspects of archaeological, built and natural heritage.</p> <p><u>Nature Conservation-</u></p> <p>North Kerry contains a number of designated sites for wildlife. These include the national designation of Natural Heritage Areas (NHAs) and areas under European legislation known as Special Areas of Conservation (SAC) (species other than birds and habitats) and Special Protected Areas (SPA) (birds). These are conservation areas important for wildlife and the habitats in which they occur, both at national and European level. The legal basis on which SACs are selected and designated is the EU Habitats Directive 92/43/EEC and the EU Birds Directive 2009/147/EC.</p> <p>Preserving the ecological heritage of an area is of paramount importance and should be protected in line with national and European policy.</p>	

## Cliff Coast Draft Destination and Experience Development Plan

### SEA Environmental Report Non-Technical Summary

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
	<p>Designated sites which occur in the north Kerry component of the Cliff Coast Destination and Experience Development Plan (CCDEDP) are diverse in nature and comprise areas of raised bog to offshore reefs and shoals. The coastal dune and salt marsh habitats are of particular sensitivity and regularly experience high visitor pressure under the current situation. The submissions highlights that any plans to increase visitor levels, or expanding those pressures into a longer 'tourist season' will need to be cognisant of the potential for negative ecological impacts on those habitats and species they support, with actions taken to ensure those negative impacts are avoided.</p> <p>The submission further lists the designated sites within North Kerry and includes NHAs, SACs, SPAs and Annex IV species,</p>	
<p><b>Department of Environment, Climate &amp; Communications - Geological Survey of Ireland (GSI)</b></p>	<p>GSI encourage use of and reference to their datasets attached to their submission. These include geoheritage (county geological sites), culture and tourism (geoparks), dimension stone/stone built Ireland, groundwater, geological mapping, geohazards, natural resources (minerals / aggregates), marine and coastal unit.</p> <p>GSI also includes a list of publicly available datasets relevant to planning, EIA &amp; SEA processes.</p> <p>It is noted that County Geological Site audit for Co. Kerry has not yet been completed. The sites are listed in the 'indicative list' of unaudited sites, created by theme-specific panels of experts, and are presented on Geological Survey Ireland's Map Viewer as sites with buffer zones but no specific site boundary. There are numerous unaudited CGSs in the vicinity of the Cliff Coast DEDP. We recommend that these be included in the SEA report when being compiled and in the DEDP itself. The audit for Co. Clare was completed in 2005.</p>	<p>The information and datasets provided have informed the preparation of the Environmental Report.</p>
<p><b>Department of Agriculture, Food &amp; Marine (DAFM)</b></p>	<p>The submission from DAFM Fisheries Division advises that commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. The evaluation of potential impacts on any commercial sea fishing activities needs to be given consideration as part of any planning/proposal process and during the development process itself. The submission advises that it is imperative that engagement should be sought with the fishing industry and other relevant stakeholders at as early a stage as possible to discuss any changes that may affect them to afford a chance for their input and to avoid, minimise, and mitigate</p>	<p>The response has been noted and the information provided has informed the preparation of the Environmental Report.</p>

## Cliff Coast Draft Destination and Experience Development Plan

### SEA Environmental Report Non-Technical Summary

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
	impacts on fishing. Fishers’ interests and livelihoods must be fully recognised, supported, and taken into account.	
<p><b>Environmental Protection Agency (EPA)</b></p>	<p>The submission from EPA includes the following comments and recommendations:</p> <p>EPA highlights several key environmental issues to consider in preparing the Plan and SEA. The submission includes specific comments on the SEA Scoping Report in Appendix I and some high-level plans to consider are listed in Appendix II.</p> <p>Governance and Implementation – The submissions recommends to set out the implementation arrangements and governance structures, including lines of responsibility for implementation and delivery as well as provisions for interim review and progress reporting. The relationship between the Plan and the National Planning Framework, Regional Spatial and Economic Strategies and the implications of the Plan in the context of existing Local Authority Plans should be set out.</p> <p>Synergies with key national plans - The relevant actions of the Climate Action Plan 2023 and the objectives and policy commitments of the National Planning Framework, River Basin Management Plan, and the Regional Spatial and Economic Strategy for the Southern should be aligned with and considered, as appropriate.</p> <p>Integration of the SEA and the Plan - The integration of the SEA process into the Plan should reflect the overall objective of the SEA Directive “<i>to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes</i>”.</p> <p>The submission advises that the SEA should address the complex and cross cutting nature of climate and biodiversity issues and include targets and measures where relevant and appropriate.</p> <p>Recommendations from the SEA &amp; AA including mitigation measures and monitoring proposals should be integrated into the Plan. SEA Environmental Report and the Plan should</p>	<p>The information provided has informed the preparation of the Draft Plan and the Environmental Report.</p>

## Cliff Coast Draft Destination and Experience Development Plan

### SEA Environmental Report Non-Technical Summary

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
	<p>include a chapter on how the recommendations and mitigation measures have been incorporated into the Plan.</p>	
	<p>EPA recommend that the Plan includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and Plan policies/measures.</p>	
	<p>EPA recommend that the SEA Environmental Report should include summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and, where relevant, Plan policies/measures.</p>	
	<p>The submission describes the key findings and chapters of the 'State of the Environment Report- Ireland's Environment An Integrated Assessment 2020'. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies.</p>	
	<p>EPA highlights the requirement under the SEA Regulations to consult with Environmental Authorities (EPA, Minister of Housing, Local Government &amp; Heritage, Minister for Environment, Climate &amp; Communications, Minister for Agriculture, Food and the Marine)</p>	
	<p>Appendix I to the EPA submission includes comments on the SEA Scoping Report - scope of the SEA, data and knowledge gaps, range of effects, consultation, transboundary consultation, monitoring, implementation &amp; reporting, SEA statement, integration with other key Plans and Programmes, available guidance &amp; resources, webtools.</p>	

### 3.5 SEA Environmental Report

The current stage of the SEA process (Stage 3) involves the preparation of the Environmental Report for the identification, description, evaluation and mitigation of the potential environmental impacts associated with the CCDEDP and the alternatives taking account of the geographical scope of the Plan.

Article 5(1) and Annex I of the *SEA Directive* provides detail on the information to be included in an Environmental Report.

### 3.6 SEA Statement

Following approval of the Cliff Coast Destination & Experience Development Plan, an SEA Statement (Stage 4) will be prepared which includes information on:

- How environmental considerations have been integrated into the CCDEDP, highlighting the main changes to the CCDEDP which resulted from the SEA process;
- How the SEA Environmental Report and consultations have been taken into account, summarising the key issues raised in consultations and in the Environmental Report indicating what action was taken in response;
- The reasons for choosing the CCDEDP in the light of the other alternatives, identifying the other alternatives considered, commenting on their potential effects and explaining why the CCDEDP, as adopted, was selected; and
- The measures decided upon to monitor the significant environmental effects of implementing the CCDEDP.

### 3.7 SEA Guidance

The SEA Environmental Report reflects the requirements of *Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment* (the *SEA Directive*) and the national implementing Regulations S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011, and by the PDR 2001, as amended.

The following principal sources of guidance were used in the SEA process including in the preparation of this Environmental Report:

- Directive 2001/42/EC on the assessment of certain plans and programmes on the environment.
- S.I. No. 435 of 2004 – European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004.
- S.I. No. 200 of 2011 -European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011.
- Planning and Development Regulations 2001, as amended.
- Guidance on Implementation of Directive 2001/42/EC, European Commission, 2004, at:  
■ [http://ec.europa.eu/environment/archives/eia/pdf/030923\\_sea\\_guidance.pdf](http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf)
- SEA of Local Authority Land Use Plans - EPA Recommendations and Resources. EPA, Updated January 2023.
- SEA Pack. EPA, Updated January 2022.
- SEA Spatial Information Sources Inventory. EPA, Updated July 2023.
- SEA Resource Manual for Local and Regional Planning Authorities. EPA, 2015.
- Good Practice Guidance on Strategic Environmental Assessment (SEA) for the Tourism Sector. EPA, June 2023.



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- Good Practice Guidance on Strategic Environmental Assessment (SEA) and Landscape. EPA, December 2023.
- Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring. EPA, March 2023.
- Guidance on Strategic Environmental Assessment - Environmental Impact Assessment Tiering, EPA, 2021.
- Local Authority Climate Action Plan Guidelines. Department of the Environment, Climate and Communications, March 2023.
- EPA Mapping. Environmental Mapping / Geographical Information System (GIS) tools are available at: <http://gis.epa.ie/SeeMaps>
- EPA Water and Air Quality Reports at: <https://www.epa.ie/pubs/legislation/air/quality/>
- EPA Ireland's Environment – An Integrated Assessment 2020 at: <https://www.epa.ie/our-services/monitoring--assessment/assessment/irelands-environment/state-of-environment-report-/#>
- SEA (EPA) Spatial Information Sources at: <http://www.epa.ie/pubs/advice/ea/>
- Developing and Assessing Alternatives in Strategic Environmental Assessment, EPA 2015 at: [https://www.epa.ie/publications/research/biodiversity/EPA-157\\_web.pdf](https://www.epa.ie/publications/research/biodiversity/EPA-157_web.pdf)
- Integrating Climate Change into Strategic Environmental Assessment in Ireland - A Guidance Note. EPA, 2015.
- Climate Action Plan 2023, Changing Ireland for the Better. Department of Environment, Climate and Communications, 2023.
- Circular Letter PL 9/2013: Article 8 (Decision Making) of EU Directives 2001/42/EC on Strategic Environmental Assessment (SEA) as amended. Department of Environment, Community and Local Government, 2013.
- Circular Letter PSSP 6/2011: Further Transposition of EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA). Department of Environment, Community and Local Government, 2011.
- Circular Letter SEA 1/08 & NPWS 1/08: Appropriate Assessment of Land Use Plans. Department of Environment, Heritage and Local Government, 2008.
- Integrated Biodiversity Impact Assessment - Streamlining AA, SEA and EIA Processes: Practitioner's Manual. Strive Report Series No. 106. Department of Environment, Community and Local Government, 2013.
- Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment. European Commission 2013.
- Managing Natura 2000 Sites - The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. European Commission, 2000, at: [http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision\\_of\\_art6\\_en.pdf](http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision_of_art6_en.pdf)
- Assessment of plans and projects significantly affecting Natura 2000 sites - Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission, 2002, at: [http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura\\_2000\\_asses\\_en.pdf](http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_asses_en.pdf)
- Appropriate Assessment of Plans and Projects in Ireland. National Parks and Wildlife Service, 2009, at: [http://www.npws.ie/publications/archive/NPWS\\_2009\\_AA\\_Guidance.pdf](http://www.npws.ie/publications/archive/NPWS_2009_AA_Guidance.pdf)

### 3.8 Appropriate Assessment

The EU Habitats Directive (92/43/EEC) requires an Appropriate Assessment (AA) to be carried out where a plan or project is *likely to have a significant impact* on a Natura 2000 site. Natura 2000 sites include Special Areas of Conservation (SAC) and Special Protection Areas (SPA).

Stage 1 is to establish whether AA is required for the particular plan or project. This stage is referred to as 'screening for the requirement for AA', and its purpose is to determine, on the basis of a preliminary assessment and objective criteria, whether a plan or project, alone or in combination with other plans or projects, could have significant effects on a Natura 2000 site, in view of the site's conservation objectives.

As set out in Department Circular Letter SEA 1/08 & NPWS 1/08<sup>11</sup> (15 February 2008), Screening for AA is of relevance to SEA screening in that *"where following screening, it is found that the draft plan or amendment may have an impact on the conservation status of a Natura 2000 site or that such an impact cannot be ruled out, adopting the precautionary approach:*

- An AA of the plan must be carried out, and
- In any case where SEA would not otherwise be required, it must also be carried out."

Hence, where a plan requires AA, it shall also require SEA.

A Stage 2 Appropriate Assessment (AA) and the preparation of a Natura Impact Statement (NIS) has been undertaken alongside the preparation of the CCDEDP and the SEA Environmental Report.

The AA has concluded that the CCDEDP will not affect the integrity of the Natura 2000 network.

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<sup>11</sup> NPWS SEA letter: <https://www.npws.ie/sites/default/files/general/circular-sea-01-08.pdf>

## 4 Relationship with Plans and Programmes

Fáilte Ireland has prepared the Cliff Coast Destination and Experience Development Plan to enhance the visitor experience, promote tourism and support economic growth. The plan is designed to build on the ambition of the Wild Atlantic Way Regional Tourism Development Strategy. Regional Tourism Development Plans, 2023- 2027 (RTDS) have been developed for each of Fáilte Ireland’s four Regional Experience Brands (Ireland’s Ancient East, Wild Atlantic Way, Dublin and Ireland’s Hidden Heartlands). These plans provide the strategic framework for other tourism development strategies, most notably, Destination and Experience Development Plans (DEDPs) and County Tourism Strategies. The CCDEDP has been developed to contribute to the overarching regional objectives for the Wild Atlantic Way.

As part of the SEA process, it is necessary to consider the environmental protection objectives, established at the international; European and national level which are relevant to the CCDEDP and how they have been taken into account during the preparation of the Plan. In its making, the CCDEDP sits at the lower level of the hierarchy and must comply with relevant higher-level strategic actions / plans. These documents include plans and programmes, which have also been subject to their own environmental assessment processes, as relevant, are detailed below.

There is a legislative framework for the protection of the environment and our natural resources relevant to the CCDEDP. **Table 4.1** below provides a list of the principle legislative framework.

**Table 4.2** and **Table 4.3** below provide a working list of the principal plans and programmes influencing the formulation of the CCDEDP and the Environmental Report, either directly or through European, National and / or County level policy. The relationship with other plans and programmes is discussed, as appropriate, under the Current State of the Environment in **Section 5** of this Report.

**Table 4.1 Legislative Framework**

Legislative Framework	
Planning and Development Act 2000, as amended	Environmental Noise Directive (2002/49/EC)
Planning and Development Regulations 2001, as amended	Environmental Liability Directive (2004/35/EC)
Strategic Environmental Assessment (SEA) Directive (2001/42/EEC)	Fourth Daughter Directive (2004/107/EC)
Environmental Impact Assessment Directive (2011/92/EU) as amended by (2014/52/EU)	Renewable Energy Directive (2018/2001/EU) as amended by (EU/2023/2413)
Habitats Directive (92/43/EEC)	European Communities (Birds and Natural Habitats Regulations) 2011 (S.I. No. 477 of 2011) (as amended)
Birds Directive (2009/147/EC) on the Conservation of Wild Birds, 1979	Renewable Energies in the 21 <sup>st</sup> Century: Building a More Sustainable Future
Water Framework Directive (WFD) (2000/60/EC)	EU 2020 climate and energy package
Groundwater Directive (2006/118/EC)	EU Renewable Energy Road Map
Flood Directive (2007/60/EC)	European Landscape Convention 2000
Bathing Water Directive (2006/7/EC)	Wildlife Acts 1976-2023
Shellfish Waters Directive (2006/113/EC)	The Water Services Act (2007 – 2017)
Marine Strategy Framework Directive (2008/56/EC)	Foreshore Act 1933-2022

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Legislative Framework	
Urban Wastewater Directive (91/271/EEC)	Aquaculture Act 1997-2006
Drinking Water Directive (98/83/EC)	Sea Fisheries & Maritime Jurisdiction Act 2006
Waste Framework Directive (2008/98/EC)	The National Monuments Act 1930-2014
EU Landfill Directive (1999/31/EC)	Roads Act 1993, as amended
Air Quality Directive (2008/50/EC)	European Union (Birds and Natural Habitats) (Sea Fisheries) Regulations 2013

Table 4.2 Relevant National & Regional Plans and Programmes

National & Regional Plans and Programmes	
Project Ireland 2040 - National Planning Framework (NPF)	National Policy Position on Climate Action and Low Carbon Development
National Development Plan (NDP) 2021-2030	Climate Action Roadmap 2023
Regional Planning Guidelines for the South-East Region 2010-2022	National Sustainable Mobility Policy (2022)
Regional Spatial and Economic Strategy (RSES) for the Southern Region	Spatial Planning and National Roads Guidelines (2012)
Ireland's Environment - An Integrated Assessment 2020	The Traffic and Transport Assessment Guidelines (2014)
National Mitigation Plan 2017	Transport Strategy for the Greater Dublin Area 2022-2042
Our Sustainable Future - A Framework for Sustainable Development for Ireland (2012)	Design Manual for Urban Roads and Streets (2019)
Housing for All – A New Housing Plan for Ireland (2021)	Ireland's First National Cycle Policy Framework 2009
Sustainable Urban Housing: Design Standards for New Apartments (2023)	National Waste Management Plan for a Circular Economy 2024 - 2030
4 <sup>th</sup> Biodiversity Action Plan 2023-2030	The National Renewable Energy Action Plan
Harnessing Our Ocean Wealth An Integrated Marine Plan for Ireland 2012	National Energy Efficiency Action Plan 2017-2020
National Strategic Plan for Aquaculture Development 2014- 2020	Strategy for the Future Development of National and Regional Greenways 2018
Draft National Strategic Plan for Aquaculture Development 2030	The National Broadband Plan 2020
National CFRAMS Programme	National Landscape Strategy for Ireland 2015-2025
River Basin Management Plan for Ireland 2018-2021	Architectural Heritage Protection Guidelines for Planning Authorities (2011)
Draft River Basin Management Plan 2022-2027	Heritage Ireland 2030
The Planning System and Flood Risk Management (2009)	Food Harvest 2020

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National & Regional Plans and Programmes	
South Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study	National Adaptation Framework Planning for a Climate Resilient Ireland 2018 and Review of the National Adaptation Framework 2022
People, Place and Policy Growing Tourism to 2025	Climate Action Plan 2024
Fáilte Ireland Corporate Plan	Water Services Strategic Plan / Capital Investment Programme (Uisce Éireann)
Tourism Action Plan 2019 – 2021	Regional Tourism Development Strategies (2023-2027) & Ireland Ancient East Regional Tourism Development Strategy 2023 - 2027
Strategy for the Future Development of National and Regional Greenways	Our Rural Future: Rural Development Policy 2021 – 2025
National Physical Activity Plan 2013 – 2025	Actions to Promote Sustainable Tourism Practices 2021 - 2023

Table 4.3 Relevant Local Plans and Programmes

Local Plans and Programmes	
Clare County Development Plan 2023-2027	County Clare Tourism Strategy 2030
Kerry County Development Plan 2022-2028	County Kerry Tourism Strategy & Action Plan 2016-2022
Loop Head Tourism Development Strategy 2020-2030	Kerry County Council Greenway Strategy
North Kerry Blueway and Marine Activity Study 2018, North East West Kerry Development	Kilrush Tourism Destination Development Strategy, Kilrush Town Team
Developing Tourism in Tralee – Action Plan to 2025, Tralee Chamber Alliance	

## 5 Current State of the Receiving Environment (Environmental Baseline)

### 5.1 Introduction

The SEA Directive requires that the information on the baseline environment is focused upon the relevant aspects of the environmental characteristics of areas likely to be significantly affected and the likely evolution of the current environment in the absence of the CCDEDP. Being consistent with the strategic provisions of the CCDEDP, this section provides a strategic description of aspects of environmental components which have the greatest potential to be affected by implementation of the CCDEDP, if unmitigated.

### 5.2 Likely Evolution of the Environment in the Absence of the Draft Cliff Coast Destination & Experience Development Plan

The development plan for Kerry and Clare promote the development and strengthening of the overall value of tourism in this region as stated below.

The *Kerry County Development Plan 2022-2028* states that:

*KCDP 10-9 Facilitate and support the implementation of the Wild Atlantic Way Tourism Plans Fáilte Ireland Visitor /Destination Experience Development Plans, Heritage Town and Destination Town Plans and to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these tourism plans.*

The *Clare County Development Plan 2023-2029* state that:

*CDP 9.6 It is an objective of Clare County Council:*

*i) To work with Fáilte Ireland and other tourism stakeholders to support the successful implementation and delivery of Wild Atlantic Way Tourism Plans.*

It is a requirement of the SEA Directive to consider – ‘the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.’ In the absence of the CCDEDP it is envisaged that the baseline environment would primarily evolve in line with the policies and objectives of the Kerry County Development Plan 2022-2028, Clare County Development Plan 2023-2029 and Local Area Plans (LAPs) for the County. The County Development Plans detail policies and objectives specific to tourism, however, the standalone CCDEDP provides significant opportunities for specific set of tourism-related mitigation measures and the associated likely positive environmental effects.

The CCDEDP is focused on an area extending from Tralee across North Kerry to Loop Head Peninsula and Spanish Point in West Clare. The CCDEDP will play a key role in how other DEDPs impact on visitor flow, dispersion into and around the destination and increase dwell time along the Wild Atlantic Way. It will serve as an important link to the Burren DEDP and connect North Kerry with the Dingle Peninsula and Killarney DEDP’s. Additional opportunities are presented through the connectivity with the Limerick Gateway Plan and how visitors will consider exploring North Kerry and West Clare from their Limerick City accommodation base.

The CCDEDP approach will capitalise on the opportunities provided by recent and future product investment while increasing the supply of saleable experiences for the visitor to engage with. Changing visitor perspectives on sustainability have accelerated the demand for sustainable tourism activity at a

pace comparable to the digitalisation of businesses. This presents the destination with new opportunities to facilitate the visitor in achieving their personal sustainable goals while contributing to sustainable tourism destinations and communities.

Therefore while higher level environmental protection objectives – such as those of *County Development Plans* and various EU Directives and transposing Irish Regulations – would still apply, the absence of the CCDEDP would mean that new development would be less coordinated and controlled. Less coordinated and controlled development would be less certain to result in the positive effects provided for by the CCDEDP.

### 5.3 Description of the Environmental Baseline

The baseline data helps to assess the current state of the environment, facilitate the identification, evaluation and subsequent monitoring of the effects of the Plan. Thus, this information creates a platform whereby existing issues relevant to the study area can be quantified, where possible, or qualified thereby ensuring that the implementation of CCDEDP does not exacerbate identifiable problems.

Baseline data collection is a first step in the process of evaluating the sensitivity of the environment. The *SEA Directive* requires that information is provided on ‘*any existing environmental problems which are relevant to the Plan or programme...*’. Information is therefore provided on existing environmental problems which are relevant to the Plan, thus helping to ensure that the Plan does not exacerbate any existing environmental problems in the study area.

The environmental aspects are described in line with the legislative requirements, under the following headings:

- Biodiversity (including Flora & Fauna);
- Population and Human Health;
- Land, Soils and Geology;
- Water Quality;
- Air Quality, Noise and Climate;
- Cultural Heritage;
- Landscape & Visual;
- Material Assets;
- Interaction of the foregoing; and
- Cumulative Impacts.

The Regional Tourism Development Strategies 2023-2027 published by Fáilte Ireland provide a framework for sustainable tourism development across Ireland and include Regional Tourism Strategies for Ireland’s Ancient East, Wild Atlantic Way, Ireland’s Hidden Heartlands and Dublin. The Regional Tourism Development Strategies will be activated across every region through a series of local area action plans, referred to as Destination and Experience Development Plans (DEDPs). Under the Wild Atlantic Way Regional Tourism Development Strategy 2023-2027, there is a requirement to prepare DEDP for the Cliff Coast (North Kerry & West Clare).

#### 5.3.1 Biodiversity

Within the study area, there are a number of areas designated for protection under the Natura 2000 network. Special Areas of Conservation (SACs) are legally protected under the EU Habitats Directive (92/43/EEC) and are selected for the conservation of Annex I habitats and Annex II species. Special

Protection Areas are protected under the European Union Directive on the Conservation of Wild Birds 2009/147/EC.

There are 14no. SACs and 9no. SPA within the study area. There are a further 7no. SPAs and 24no. SACs within the Zol of the CCDEDP. Conservation objectives for SACs and SPAs have been set for the habitats and species for which the sites have been selected. Site specific detailed conservation objectives are available on the NPWS website<sup>12</sup>. Any potential for impact on European Sites have been fully addressed in the NIS that accompanies the CCDEDP and SEA Environment Report.

Nationally Designated Sites include *Natural Heritage Areas* (NHAs) and *Proposed Natural Heritage Areas* (pNHAs) located in the study area and within the zone of influence of the County boundary are detailed in the SEA ER.

Under the requirements of the *Water Framework Directive* (WFD) a number of waterbodies (or parts of) must have extra controls on their quality by virtue of how their waters are used by people and by wildlife have been listed on Registers of Protected Areas (RPAs). A number of these protected areas are present within the study area and these are as follows:

- WFD RPA Nutrient Sensitive Areas (Lake, Coastal & Transitional waterbodies) – Cashen / Feale Estuary (IE\_SH\_060\_0100), Feale Estuary Upper (IE\_SH\_060\_0200).
- WFD RPA Nutrient Sensitive Areas (Rivers) – none within study area.
- WFD RPA Shellfish Areas – West Shannon Poulmasherry Bay (IE\_SH\_060\_0000), West Shannon Carrigaholt (IE\_SH\_060\_0000), West Shannon Rinevella (IE\_SH\_060\_0000), West Shannon Ballylongford (IE\_SH\_060\_0000), Tralee Bay (IE\_SH\_050\_0000), Inner Bay Maharees (IE\_SH\_040\_0000).
- Salmonid Rivers – Feale (IE\_SH\_23F010200), Brown Flesk (IE\_SW\_22B030250), Blackwater [Munster] (IE\_SW\_18B020075).

The *EU Shellfish Waters Directive* (2006/113/EC) aims to protect and improve shellfish waters in order to support shellfish life and growth. There are six areas of Shellfish waters within the study area - West Shannon Poulmasherry Bay (IE\_SH\_060\_0000), West Shannon Carrigaholt (IE\_SH\_060\_0000), West Shannon Rinevella (IE\_SH\_060\_0000), West Shannon Ballylongford (IE\_SH\_060\_0000), Tralee Bay (IE\_SH\_050\_0000), Inner Bay Maharees (IE\_SH\_040\_0000).

#### 5.3.1.1 Biodiversity Issues

Existing biodiversity issues / pressures and threats on Ireland's habitats and species, which are also relevant to the study area, include:

- Direct habitat loss within European Sites e.g. developments occurring on undeveloped sites, recreational activity works.
- Indirect effects on the ecological networks supporting European Sites e.g. linear developments forming barriers to movements of mobile species or loss of sites that support an overall population of species.
- Construction and use of commercial and recreational infrastructure and areas. For example development within watercourses.
- Indirect threat to water quality including changes to surface and groundwater quality and volumes.
- Direct / indirect disturbance of sensitive habitats / species e.g. recreation at harbour or coastal sites, riverside walkways, pressure from increased visitor numbers etc.
- Direct / indirect threats to European Sites by invasive species.
- Direct / indirect threats to native flora and fauna from pathogens / diseases.

<sup>12</sup> NPWS website 2019: <https://www.npws.ie/protected-sites/conservation-management-planning/conservation-objectives>



- Invasive Species and problematic species - continued control and management of invasive species. For example the loss of biodiversity as native species are shaded out, but also diseases and pathogens.

### 5.3.2 Population and Human Health

The study area includes North Kerry and West Clare. These counties are surrounded by County Cork to the south and south-east, Limerick to east and County Galway and County Tipperary to the east and north-east and Southwestern Atlantic Seaboard to the west. The *National Planning Framework* (NPF) outlines that by 2040 there will be roughly an extra one million people living in Ireland.

The 2022 Census results showed that the percentage in population change for County Kerry was 5.9%, and for County Clare was 7.7%. There has been an increase in the population of the Counties from 2016 to 2022.

The tourism industry has long been recognised as an important economic driver for the economy of the State. Tourism is particularly important in that it can assist in providing business and employment opportunities across regions and leads to jobs across the spectrum of skills requirements. The quality and diversity of tourism in the study area is particularly strong in relation to its rich heritage, quality rural landscape and many towns and villages, meaning the study area has a lot to offer as a tourist destination. The development plan for Kerry and Clare promotes the development and strengthening of the overall value of tourism in this region as previously stated. The counties have an objective to enhance the potential for economic development in the tourism sector.

#### 5.3.2.1 Existing Population and Human Health Issues

Existing population and human health issues / pressures on the population of the study area, include:

- Health and Well-being - continue the development of recreation and leisure facilities.
- Support cycle and walking tourism initiatives, in tandem with the development of greenways and blueways in the study area.
- Radon - Radon risk map levels in the study area have been collated from the EPA Radon Risk Map of Ireland, refer to SEA ER.
- Flooding - Over the past number of years there have been significant instances where flooding has occurred in areas of the County causing damage to homes and businesses. Refer to SEA ER.
- Information on the status of drinking water, wastewater and climate change are provided in other sections of this Report.

### 5.3.3 Land, Soils & Geology

Woodlands provide recreational opportunities in addition to their heritage and economic benefits. They are also important as links in the county's green infrastructure network. Coillte<sup>13</sup> have provided access to many of their forests and support the use of the forests for recreational uses and provide access to the following forests in the study area – Glanteenassig, Lyreacrompane and Ballygamboon.

The study area contains a range of soils that support various habitats and land uses and provide valuable mineral resource potential, which are described in detail in the SEA ER. These soils can be impacted upon by development, land use changes and water quality.

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<sup>13</sup> <https://www.coillte.ie/our-forests/recreation-map/>

The *Seveso III Directive* (European Directive 2012/18/EU) and the *European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations, 2000* (S.I. No. 476 of 2000) apply to companies where dangerous substances are present in quantities equal to or above specified thresholds. At present the Upper Tier Seveso (Control of Major Accident Hazards Involving Dangerous Substances) (Revocation) Regulations 2015 (S.I. No. 208 of 2015) sites in the study area include – The National Oil Reserves Agency Ltd. , Mainland Tankfarm, Tarbert Demesne, Tarbert, Co. Kerry and ESB Moneypoint, Carrowdotia, Killimer, Kilrush, Co.Clare. The Lower Tier Seveso Sites in the study area include- West Cork Distillers Limited, Bioatlantis, Clash Industrial Estate, Tralee, Co. Kerry.

According to Geological Survey, Ireland landslide susceptibility mapping, the vast majority of the county has been rated as having ‘low’ landslide susceptibility, with the risk rising to ‘moderately low’ to ‘moderately high’ in isolated patches throughout the study area, especially towards the south-west of the study area.

#### 5.3.3.1 Existing Land, Soils, Geology & Hydrogeology Issues

Existing land, soil and geology issues / pressures with environmental considerations include:

- Soil - the loss / damage of soil from the construction of greenfield sites for development.
- Land Management - conversion of land / sites can release CO<sub>2</sub> into the atmosphere and further reduce areas of ‘carbon sinks’.
- Land- management of woodlands for recreational purposes.
- Geological Heritage - the protection of sites of geological importance within the study area.

#### 5.3.4 Water Quality (including Flooding)

The *EU Water Framework Directive* (WFD) (2000/60/EC) establishes a framework for the protection of both surface water and groundwater waterbodies. The monitoring programme, as part of the WFD, assesses water quality but also water trends of rivers in relation to ecological and physio-chemical quality. The WFD status of rivers ranges from ‘high’ to ‘bad’. The EPA also undertakes water quality surveys for transitional and coastal waterbodies.

The latest *Water Quality in Ireland* report 2016-2021 was published by the EPA in 2022. The status of the **river waterbodies** in the study area range from ‘bad’ to ‘high’, however the majority of the major river waterbodies range from ‘poor’ to ‘good’. The status of the **lake waterbodies** within the study area ranges from ‘moderate’ to ‘high’. The WFD monitored lakes within the study area include – Keagh (IE\_SH\_28\_64 – Moderate), Doo CE (IE\_S\_28\_82 – Moderate), Gill KY (IE\_SH\_23\_72 – Moderate), Cam KY (IE\_SH\_23\_74 – Moderate), Acummeen (IE\_SH\_23\_59 – High). The status of coastal WFD waterbodies within the study area ranges between ‘good’ and ‘high’. The status of transitional WFD waterbodies within the study area ranges from ‘poor’ to ‘good’. Groundwater Quality Status between 2016 and 2021 was generally ‘good’<sup>14</sup> across the groundwater bodies within the study area. The groundwater vulnerability within the study area ranges from ‘low’ to ‘extreme’. The study area is underlain with both regionally important and locally important bedrock aquifer and locally important gravel aquifer.

As part of the Clare County Development Plan 2022-2028 and Kerry County Development Plan 2023-2027, Strategic Flood Risk Assessment (SFRA) has been prepared.

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<sup>14</sup> EPA Groundwater Quality Data - <https://gis.epa.ie/EPAMaps/>

#### 5.3.4.1 Existing Hydrogeology and Water Quality Issues

The Plan must comply with the requirements of the WFD and the Groundwater Directive and aim to drive improvement to water quality in both the short and long-term. Existing water quality issues / pressures with environmental considerations include:

- Water - the surface waterbodies within the study area need to be improved to achieve 'good' ecological status in waterbodies by 2027.
- Water - pressure on water sources include excessive nutrient enrichment which leads to eutrophication.
- Water - pressure on water sources also comes from land-use changes, water-based recreational sports, erosion, industry and urbanisation.
- Sustainable management of waterways and water-based recreation activities to ensure a balance between tourism development and conservation of natural resources and heritage areas.
- Water - water contamination arising through poor working practices, leakages or accidental spillage of materials if efficient pollution control measures are not fully implemented and maintained.
- Surface, ground, transitional & coastal waters - are at risk of pollution from septic tanks and wastewater treatment systems in the vicinity of waterbodies, potential pressures and impacts on water body status, water usage and flood risk from the construction projects i.e. increased sedimentation, groundwater recharge and accidental spillages. There is growing pressures from increasing population and increasing and sometimes conflicting social, economic and recreational uses.
- Flooding - flood risk to be considered as a key environmental criteria.

#### 5.3.5 Air Quality, Noise & Climate

The current trends in air quality in Ireland are reported in the EPA publication '*2022 Annual Report on Air Quality in Ireland*' which is currently the most up to date analysis of air quality data for Ireland. The study area is located within Zone C and Zone D, where Tralee is within Zone C while the remainder of the study area is located in Zone D. The air quality monitoring sites within the study area are located in Abbeyfeale (LK7) and Tralee (KY3).

Air Quality Map show whether air quality is 'good', 'fair', 'poor' or 'very poor' in each region. The current air quality across the study area is 'good'. Monitoring is done using continuous monitors for ozone and nitrogen oxides in various locations around Ireland. The pollutants of most concern are those whose main source is traffic such as Particulate Matter (PM) and Nitrogen dioxide (NO<sub>2</sub>).

In accordance with *Environmental Noise Regulations (S.I. No. 140 of 2006)*, a *Noise Action Plan 2018* was prepared by Clare County Council and also a *Noise Action Plan 2019* was prepared by Kerry County Council. For these counties the major noise source for the purpose of this plan is road traffic noise.

The recent *Climate Action and Low Carbon Development (Amendment) Act 2021* was established to provide for the approval of plans by the Government in relation to climate change. This aims at pursuing the transition to a climate resilient, biodiversity rich and climate neutral economy by no later than the end of the year 2050. Ireland's *Climate Action Plan 2023* sets out Ireland's national and sectoral targets in this regard. The IPCC Working Group II Report, published in February 2022, states that economic damage from climate change has been detected in climate-exposed sectors, with regional effects on agriculture, forestry, fishing, energy, and tourism<sup>38</sup>. The Action Plan supports the further development of sustainable tourism and sustainable destination management and provides for various measures that will contribute to climate mitigation, such as those relating to sustainable mobility, carbon pricing, electricity, agriculture and the built environment.

#### 5.3.5.1 Existing Issues

In urban areas, concern has clearly shifted to a range of pollutants associated with road traffic which may be considered relatively new in the context of air quality control. The most important of these pollutants are NO<sub>2</sub>, particulate matter less than 10 microns in diameter (PM<sub>10</sub>), carbon monoxide (CO) and a wide variety of Volatile Organic Compounds (VOCs), including carcinogens such as benzene. Therefore, it is important that a good quality road infrastructure is provided and alternatives to the private car are encouraged as much as possible.

Tourists contribute to greenhouse gas emissions across the same sources/sectors as local and national populations, e.g. transport, heating and electricity, agriculture/food production and waste generation.

The potential effects of climate change resulting in an increase in the frequency and severity of weather events, including flooding, storms, heavy snowfall, and variation in temperature. Severe rainfall events, or very cold events with or without snowfall could adversely impact upon towns and people in the study area leading to water shortages, residential flooding and disruption to infrastructure and to movement. Therefore, it will be important to improve resilience of existing and planned critical infrastructure, systems and procedures to the effects and variability of climate change.

#### 5.3.6 Material Assets

The latest *Drinking Water Quality in Public Supplies 2022*<sup>15</sup> was published by the EPA in 2023. The report provides a summary of assessment of drinking water quality in public supplies and public group water schemes in Ireland during 2022. There are currently 21 public wastewater treatment plants (WWTPs) in the study area. Irish Water and County Councils are continually progressing sewer rehabilitation activities, capital maintenance activities, etc, and the Council will continue to work with Irish Water to monitor the performance of the networks and to advance and realise capital expansions and upgrades of wastewater infrastructure for the continued sustainable growth of the Counties.

EU and National waste management policy can be summarised by the waste hierarchy of prevention, recycling, energy recovery and disposal. For the purposes of waste management planning, Ireland is now divided into three regions: Southern, Eastern-Midlands and Connacht-Ulster. The study area is located within the Southern Region. The Regional Waste Management Planning Offices have issued the National Waste Management Plan for a Circular Economy (NWMPCE) 2024 - 2030 in March 2024, which supersedes the Regional waste management plan. The NWMPCE does not however dissolve the three regional waste areas. The NWMPCE sets the ambition of the plan to have a 0% total waste growth per person over the life of the Plan with an emphasis on non-household wastes including waste from commercial activities and the construction and demolition sector.

The European Commission's Circular Economy Action Plan: A New Circular Economy Action Plan for a Cleaner More Competitive Europe, March 2020, forms one of the main blocks of the European Green Deal. A Waste Action Plan for a Circular Economy<sup>16</sup> was published in 2020 and outlines Ireland's National Waste Policy for 2020-2025.

The '*National Sustainable Mobility Policy Action Plan 2022-2025*' is a national document which seeks to achieve a shift to more sustainable means of transport by setting actions and timeline for Modal Change. The area to which the Strategy relates is served by rail, bus, cycle network, regional and strategic roads. Public transport to Wild Atlantic Way from Dublin and Galway Cities is strong with regular train and bus services operating. Public transport to facilitate circulation within the region,

<sup>15</sup> EPA Drinking Water Quality - <https://www.epa.ie/publications/compliance--enforcement/drinking-water/annual-drinking-water-reports/drinking-water-quality-in-public-supplies-2022.php>

<sup>16</sup> DCCA (2020).

however, is weaker with relatively poor linkages between towns and the principal visitor attractions. It is very difficult for a visitor to tour the region by public transport. Some Local Link services are currently expanding their routes during the summer months to provide access to key visitor attractions from some towns.

The improved provision of alternatives to the private car should bring about a reduction in demand for private car journeys and a commensurate increase in public transport, walking and cycling. Providing public transport and a network of safe, well-lit and convenient footpaths and cycleways within local neighbourhood centres, public transport stops and workplaces will encourage walking and cycling.

The development of public transport is critical in achieving more sustainable travel patterns and a reduced reliance on the car. Bus Éireann and a number of private operators operate services throughout the study area.

Air travel is essential for industrial, commercial and tourism development. The study area is served by the Kerry Airport.

ESB Networks and EirGrid are the utility providers responsible for the electricity distribution and transmission systems. Gas Networks Ireland (GNI) are the utility provider responsible for the supply, transmission and distribution of natural gas.

#### **5.3.6.1 Existing Material Asset Issues**

The increased tourism will result in increasing demand for water, wastewater treatment, waste management, transport infrastructure / links and energy and telecommunications services at the Country level.

Existing material assets issues / pressures within the study area, include:

- Water Supply and Wastewater Services - increased tourist numbers will generate pressure on existing water and wastewater sources to meet demands. Inadequate infrastructure, including inadequate capacity, contribute to the contamination of receiving surface water and groundwater waterbodies.
- Transport - the movement of people is key to the success of new development and areas, where adequate transport infrastructure (i.e. road, rail, cycle and pedestrian routes) to these developments and accessibility throughout the development / area (safe footpath and cycle paths) is fundamental to the development of tourism in the study area. Sustainable development of blueways and greenways is essential to promote recreation and tourism.
- Waste - increased tourist numbers will pose challenge in providing sustainable recycling infrastructure and will put pressure on the local authorities to provide better waste management and access to waste services.
- Light Pollution - can arise when external lighting is not properly designed or managed which can in turn lead to inappropriate or excessive light spillage.
- Utilities - provide, protect and maintain adequate utilities to support existing and envisaged development.

#### **5.3.7 Cultural Heritage**

The archaeological heritage of an area includes structures, constructions, groups of buildings, developed sites, moveable objects, monuments of other types as well as their context, whether situated on or under land or water.

The *National Monuments Acts 1930-2014* provide for the protection of archaeological heritage. The *Record of Monuments and Places (RMP)* was established under *Section 12* of the *National Monuments (Amendment) Act 1994* and structures, features, objects or sites listed in this Record are known as Recorded Monuments.

The record of protected structures within the study area are presented in SEA ER,

#### **5.3.7.1 Cultural Heritage Issues**

Increased tourist activities have the potential for direct negative impacts on heritage features and their setting. Development of infrastructure, in addition to development resulting from economic growth and increasing population, can potentially impact on the integrity of sites or features of architectural, archaeological or cultural heritage interest. This could directly impact upon the cultural amenity resource and tourism potential of the study area.

Existing cultural heritage issues / pressures include:

- Development of infrastructure -increased visitor numbers can potentially impact on the integrity of sites or features and their views to / from architectural, archaeological or cultural heritage interest.
- Development in close proximity to sites and areas of cultural heritage may adversely impact upon the cultural landscape setting.
- Development has the potential to impact archaeological heritage which is sub-surface. This includes the insertion of services (e.g. cycleways), landscaping works, ground levelling and tree planting.
- Architecture - impact on heritage streetscapes of regional and local importance.
- Archaeology - impact on archaeological monuments and their settings including undiscovered sites / features.
- Risk - protection of built and archaeological heritage to identify the heritage assets at risk.

#### **5.3.8 Landscape & Visual**

A National Landscape Strategy for Ireland 2015-2025<sup>17</sup> was published, in line with Ireland's obligations under the European Landscape Convention. The key objectives of this Strategy are the recognition of landscape in law and the provision of a policy framework to put measures in place for the management and protection of landscape, the production of a national Landscape Character Assessment (LCA) through data gathering and an evidence based description of character assessment, raising awareness and public consultation.

The landscape character areas and values are detailed in the SEA ER.

There is a need to protect and conserve views and prospects adjoining public roads and river valleys throughout the county where these views are of high amenity value. Landscape objectives of the current Development Plans aims to preserve the views and prospects and to protect views from development which would interfere unduly with the visual amenity and character of the landscape, so far as practically possible.

Many of these views are associated with heritage and tourism sites and provide vantage points over high quality landscapes. These scenic views are of an amenity and tourism value and contribute to our quality of life.

The protected views and prospects with the study area are detailed in the SEA ER.

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<sup>17</sup> National Landscape Strategy: <https://www.chg.gov.ie/app/uploads/2015/07/N-Landscape-Strategy-english-Web.pdf>

#### 5.3.8.1 Existing Problems

Landscape can be considered a dynamic rather than static asset. It is constantly changing, and its changes are driven by nature itself, by direct human intervention, and indirectly through the consequences of human activity, notably Climate Change. All physical development undertaken by human impacts on the landscape.

Areas of a highly sensitive landscape have a low capacity to absorb new development and this can be a challenge to locate new development in these areas without it becoming unduly obtrusive.

Existing landscape and visual issues / pressures include:

- New development having adverse and visual impacts on the landscape and seascape.
- Green Infrastructure - protecting the existing green infrastructure network from fragmentation and loss due to pressures of urban development within and adjoining the network.
- Ecosystem Services - recognising and promoting the value of ecosystem services that the green infrastructure network provides to the study area.
- Protected views – development has potential to obstruct protected views and scenic routes.

## 6 Strategic Environmental Objectives

The SEA Directive requires that ‘the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.’ Given the position of the CCDEDP beneath the Kerry County Development Plan 2022-2028, Clare County Development Plan 2023-2029 in the land use planning hierarchy, the measures identified in the SEA for the Development Plans have also been considered in this assessment, with some modification where appropriate.

A series of Strategic Environmental Objectives (SEOs) have been prepared in line with current guidance and also with specific reference to the SEA for the CCDEDP (refer to **Table 6.1**). The SEOs provide a basis for the assessment of the environmental effects of the CCDEDP and are framed in such a manner as to enable the CCDEDP to be fully assessed in environmental terms.

SEOs are distinct from the strategic objectives within the CCDEDP, although they often overlap and are developed from international, national and regional policies which generally govern environmental protection objectives. These high-level SEOs are paired with specific targets which can be monitored using indicators.

**Table 6.1 Strategic Environmental Objectives (SEOs) for Draft CCDEDP**

Theme	SEO Code	Strategic Environmental Objective
Biodiversity (Flora & Fauna) (B)	B_1	Ensure compliance with the Habitats and Birds Directives with regard to the protection of Natura 2000 Sites and Annex habitats and species <sup>18</sup> and no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function.
	B_2	Preserve, protect, maintain and where appropriate enhance the terrestrial, aquatic and soil biodiversity, including internationally, EU and nationally designated sites, habitats and protected species.
	B_3	Ensure CCDEDP does not contradict biodiversity protection, restoration and rehabilitation objectives in the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029.
Population & Human Health (PHH)	PHH_1	Promote sustainable high quality tourism within the Counties that supports economic development and maximises potential for employment and investment.
	PHH_2	Improve health and wellbeing by provision of recreational and tourism-related activities.
Land, Soils & Geology (LSG)	LSG_1	Minimise green field development and protect land and soil resources from pollution and degradation.
Water Quality (WQ)	WQ_1	Protect, maintain and where necessary improve water quality and the management of watercourses, groundwater and the marine environment, in compliance with the requirements of the WFD objectives and measures.

<sup>18</sup> ‘Annexed habitats and species’ refer to those listed under Annex I, II & IV of the EU Habitats Directive and Annex I of the EU Birds Directive.



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Theme	SEO Code	Strategic Environmental Objective
	WQ_2	Implement and comply with the provisions of the Flood Risk Management and Sustainable Drainage Systems Guidelines to avoid inappropriate development in areas at risk of flooding.
Air Quality, Noise & Climate (ANC)	ANC_1	Maintain and promote continuing improvement in air quality and noise emissions through the reduction of emissions.
	ANC_2	Contribute towards climate adaptation and mitigation and reduction of greenhouse gas emissions in line with National targets, including Ireland's commitment to realising a climate neutral economy by 2050.
Material Assets (MA)	MA_1	To contribute towards the protection of public assets and infrastructure, ensure new developments are served with adequate and appropriate critical infrastructure with sufficient capacity (drinking water, wastewater, waste and transport) that does not present a danger to human health.
	MA_2	Promote sustainable waste management, minimisation and recovery.
	MA_3	Promote sustainable transportation including increased use of public transport and active travel measures.
Cultural Heritage (CH)	CH_1	Protect and avoid impact on places, features and landscapes of cultural and archaeological importance, including entries to the Record of Monuments and Places (RMP).
	CH_2	Protect and avoid impact on places, features, buildings and landscapes of architectural heritage, (including entries to the Record of Protected Structures (RPS) and National Inventory of Architectural Heritage (NIAHs)).
Landscape & Visual (LV)	LV_1	To protect landscape character, minimise the loss of historic landscape features such as mature trees and hedgerows and scenic views.
	LV_2	Avoid impacts on the statutory landscape & visual designations as identified in the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029.

## 7 Assessment of Alternatives

### 7.1 Introduction

Article 5(1) of the SEA Directive requires the Environmental Report to consider reasonable alternatives taking into account the objectives and geographical scope of the plan or programme and the significant environmental effects of the alternatives selected.

Alternatives put forward should be reasonable, realistic and capable of implementation. They should also be in line with the appropriate strategic level at which the plan will be implemented within the national planning hierarchy. As preparation of the Cliff Coast Destination Experience Development Plan is a non-statutory plan, the 'do-nothing' or 'do-minimum' scenarios are viable alternatives, as is the 'do-something' scenario.

### 7.2 Alternative 1: Do-nothing / Do-Minimum

Tourism operations in North Kerry and West Clare would continue to operate as at present outside of a plan, whose objective is to facilitate, promote, support and coordinate the various stakeholders involved in tourism activities and interest.

### 7.3 Do-something (Alternatives 2A and 2B: Prepare a Plan)

The do-something scenario sees the preparation of a Plan that seeks to better manage tourism in North Kerry and West Clare. The Plan will facilitate, promote, support and coordinate the various stakeholders (including local authorities, other government agencies, tourism operators, communities and visitors) in their activities in a manner that is consistent with existing and emerging plans that have been subject to environmental assessment.

While the Plan would co-ordinate activities and stakeholders in the tourism area, it would not provide consent, establish a framework for granting consent or contribute towards a framework for granting consent (such frameworks fall under the remit of other public authorities). Therefore, any projects arising from the Plan would be required to comply, as relevant, with the various provisions of documents that form the statutory decision-making and consent-granting framework.

In essence the Plan would present a five-year sustainable tourism development plan for the Cliff Coast. The key objectives of the Plan would be:

- *Ensure local experiences are brought to life through the development of the optimal mix of hero and ancillary tourism products that attract visitors and retain them for longer in the destination.*
- *Unlock the economic growth potential of an area by progressing a range of key initiatives that will motivate tourists to explore the wider destination.*
- *Develop a sustainable basis for commercial tourism development centred on creating strong signature, supporting and ancillary experiences that are commoditised through the creation of saleable experiences that excite consumers and buyers alike.*
- *Create the conditions to attract leisure visitors on a year-round basis to North Kerry and West Clare to immerse themselves actively in the community, interacting with local people.*
- *Strengthen the value of tourism to the local community by providing sustainable employment opportunities.*

There are two separate alternatives under the 'do-something' (prepare a Plan) scenario.

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

Fáilte Ireland provides funding for sustainable tourism projects including land use and infrastructural development and land use activities. In order to achieve funding (including promotion) for land use or infrastructural development or land use activities, Alternative 2A would require stakeholders to demonstrate compliance with measures relating to sustainable development, environmental protection and environmental management contained within the relevant Fáilte Ireland published guidance and documents.

In order to be realised, projects included in the Plan (in a similar way to other projects from any other sector) would have to demonstrate compliance, as relevant, with various provisions of legislation, policies, plans and programmes that form the statutory decision-making and consent-granting framework, of which the Plan is not part and does not contribute towards.

Further environmental requirements would be integrated into the Plan under Alternative 2A, relating to infrastructure capacity, visitor management and green infrastructure and ecosystem services.

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

Alternative 2B would not include the requirements for environmental protection and management described under Alternative 2A. Projects would continue to be required to comply, as relevant, with the various provisions of documents that form the statutory decision-making and consent-granting framework.

## **7.4 Assessment of Alternatives**

The potential effects of the reasonable alternatives on the SEOs categorised as follows:

- Potential Positive Environmental Impact (indicated by '+')
- Potential Negative Environmental Impact (indicated by '-')
- Potential Positive and Negative Environmental Impacts (indicated by '+/-').
- Uncertain Environmental Impact ((indicated by '?').
- Neutral, No or Insignificant Environmental Impact (indicated by '0')

## **7.5 Reasoning for Selection of the Preferred Alternative**

Whilst unlikely to have negative environmental effects, Alternative 1 does not deliver positive benefits for tourism in North Kerry and West Clare.

Alternative 2A will deliver effective benefit and response for tourism in North Kerry and West Clare, whilst at the same providing for sustainable development and environmental protection.

Alternative 2B will deliver effective benefit and response for tourism in North Kerry and West Clare, but without ensuring environmental protection.

Given the tourism and environmental benefits, Alternative 2A is selected as the preferred approach.

## 8 Assessment of Effects of the Cliff Coast Draft Destination Experience Development Plan

### 8.1 Introduction

The CCDEDP has been subject to an assessment for potential effects arising from the implementation of the Plan on the baseline environment as characterised and described in **Section 5** of this Report. The assessment is carried out having regard to the Strategic Environmental Objectives (SEOs) established for the aspects of the baseline environment which have potential to be impacted by the CCDEDP. These Strategic Environmental Objectives (SEOs) are detailed in **Section 6** of this Report.

The Clare County Development Plan 2023-2029 states that-

*'CDP9.25 – It is an Objective of Clare County Council:*

*k.) To work with Fáilte Ireland in the preparation and implementation of the Cliff Coast Destination Experience Development Plan.'*

The Kerry County Development Plan 2022-2028, states that-

*'KCDP 10-9 - Facilitate and support the implementation of the Wild Atlantic Way Tourism Plans Fáilte Ireland Visitor /Destination Experience Development Plans, Heritage Town and Destination Town Plans and to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these tourism plans.'*

It is noted that during its preparation the Clare County Development Plan 2023-2029<sup>19</sup> and Kerry County Development Plan 2022-2028<sup>20</sup>, was subject to full SEA, Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The environmental assessment of the 'Strategic Objectives and Initiatives' and of the 'Catalyst Projects and Destination Supporting Projects/Enablers' of the CCDEDP are set out separately in the following sections of this Report. The SEA Directive requires the Environmental Report to include information on the likely significant effects on the environment, including on issues such as biodiversity, fauna, flora, population, human health, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.

### 8.2 Environmental Assessment of the Strategic Goals and Strategic Objectives of the Cliff Coast Draft Destination Experience Development Plan

The finding of the environmental assessment of the overall Vision, Strategic Objectives & Strategic Initiatives of the Draft CCDEDP is presented in **Table 8.1**.

<sup>19</sup> Clare County Development Plan 2023-2029- <https://clarecdp2023-2029.clarecoco.ie/stage3-amendments/adoption/>

<sup>20</sup> Kerry County Development Plan 2022-2028 - <https://cdp.kerrycoco.ie/>

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**Table 8.1 Environmental Assessment of Strategic Objectives of the CCDEDP**

(SEO Key: B – Biodiversity, PHH – Population & Human Health, LSG – Land, Soils & Geology, WQ – Water Quality, ANC – Air Quality, Noise & Climate Change, MA – Material Assets, CH – Cultural Heritage, LV – Landscape & Visual)

Strategic Objectives and Initiatives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required? Yes / No
<p><b>Vision</b></p> <p>The Destination Vision (10 year vision) for CCDEDP is:</p> <p><i>“The Cliff Coast is recognised as a leader in sustainable tourism where visitors clearly understand their role in contributing to community wellbeing and responsible tourism. The striking coastline is renowned for its cliff top walks and soul stirring views of a cliff coast brought alive through its vibrant communities and the opportunity to sample the best of local culture and traditional music. It is a leading family destination where the visitor has access to great indoor attractions and outdoor activities. The quality of the outdoor activity product and</i></p>	<p>This vision statement sets an overall context for destination experience and tourism in North Kerry and West Clare. This will support and underpin the local tourism economy, sustainable tourism and the quality of tourism. No specific projects are associated with the statement, and therefore the effect on the remaining environmental themes and SEOs will be neutral.</p>	<p><b>PHH</b> (PHH1, PHH2)</p>			<p><b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2), <b>LV</b> (LV_1, LV2)</p>	<p><b>No</b></p>

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Strategic Objectives and Initiatives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required ? Yes / No
<p><i>coastal tourism adventure encourages slow adventure exploration with greenways acting as the link between the land and water adventure clusters in Tralee Bay and West Clare. Visitors have access to world class coastal tourism and marine experiences from dolphin watching to water activities linking our islands and coastal communities."</i></p>						
<p><b>RTDS Strategic Objective 1: Grow the year-round appeal of the Wild Atlantic Way domestically and internationally ensuring we attract and disperse high value visitors into and throughout the region.</b></p>						
<p>1.1 Address the challenge of the area perceived as a transient destination in the international marketplace located between more mature tourism destinations.</p>	<p>This initiative will result in positive effects on population and human health by provision of enhanced visitor experience.</p> <p>However, in the absence of mitigation, development of any new and existing developments/ projects to address the challenge, might result in negative environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. These types of infrastructure</p>	<p><b>PHH</b> (PHH1, PHH2)</p>	<p><b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>MA</b> (MA1, MA2, MA3), <b>LV</b> (LV_1, LV2)</p>	<p><b>CH</b> (CH1, CH2), <b>ANC</b> (ANC1, ANC2),</p>		<p><b>Yes</b></p>

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Strategic Objectives and Initiatives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required ? Yes / No
	<p>have potential to be located in ecologically and visually sensitive areas adjacent to the banks of rivers and streams or along the coastal/transitional waters. Increased tourism in these locations would also require provision of welfare facilities, wastewater and waste management</p>					
<p>1.2 Develop the Cliff Coast as an activity destination providing visitors with access to great land and water based experiences.</p>	<p>This initiative will result in positive effects on population and human health by provision of enhanced visitor experience.</p> <p>However, in the absence of mitigation, this initiative could have the potential to result in negative or uncertain environmental effect on biodiversity, water quality, cultural heritage, land &amp; soils, landscape and visual, material assets and air &amp; noise. The development of new and existing land and water based activities might result in negative environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. These types of infrastructure have potential to be located in ecologically and visually sensitive areas adjacent to the banks of rivers and streams or along the coast/transitional waters. These works can</p>	<p><b>PHH</b> (PHH1, PHH2)</p>	<p><b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>MA</b> (MA1, MA2, MA3), <b>LV</b> (LV_1, LV2)</p>	<p><b>CH</b> (CH1, CH2), <b>ANC</b> (ANC1, ANC2)</p>		<p><b>Yes</b></p>

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Strategic Objectives and Initiatives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required ? Yes / No
	also potentially result in the spread of invasive species. Increased tourism in these locations would also require provision of welfare facilities, wastewater and waste management.					
1.3 Maximise the potential of Tralee as a destination day and accommodation hub for the Cliff Coast.	<p>This initiative will enhance tourism opportunities and will have positive effect on population and human health.</p> <p>However, the development of existing and new accommodation infrastructure presents potential uncertain environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. This would also require provision of welfare facilities, wastewater and waste management which has potential to effect the receiving environment.</p>	<b>PHH</b> (PHH1, PHH2)		<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)		<b>Yes</b>
1.4 Create destination clusters for water adventure activities building on the existing potential of Tralee Bay and West Clare.	<p>This initiative will result in positive effects on population and human health by provision of enhanced visitor experience.</p> <p>However, in the absence of mitigation, this initiative could have the potential to result in negative or uncertain environmental effect on biodiversity, water quality, cultural</p>	<b>PHH</b> (PHH1, PHH2)		<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>MA</b> (MA1, MA2, MA3), <b>LV</b> (LV_1, LV2) <b>ANC</b> (ANC1, ANC2), <b>CH</b> (CH1, CH2)		<b>Yes</b>



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Strategic Objectives and Initiatives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required ? Yes / No
	<p>heritage, land &amp; soils, landscape and visual, material assets and air &amp; noise. The development of new and existing water based activities might result in negative environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. These types of infrastructure have potential to be located in ecologically and visually sensitive areas adjacent to the banks of rivers and streams or along the coast/transitional waters. These works can also potentially result in the spread of invasive species. Increased tourism in these locations would also require provision of welfare facilities, wastewater and waste management.</p>					
<p>1.5 Develop cliffs and coastal trails experiences to disperse visitors across the Cliff Coast and prepare for the future development of the Wild Atlantic Way Coastal Walk.</p>	<p>The development of new and existing greenways, trails and walking routes, has the potential to contribute to sustainable mobility, reduction in emissions and a better management of movements in sensitive areas, thereby benefiting various environmental components including habitats at certain locations.</p>	<p><b>PHH</b> (PHH1, PHH2)</p>		<p><b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>MA</b> (MA1, MA2), <b>CH</b> (CH1, CH2), <b>ANC</b> (ANC1, ANC2)</p>		<p><b>Yes</b></p>

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Strategic Objectives and Initiatives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required ? Yes / No
	<p>The development of these projects, however, may result in uncertain environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. These types of infrastructure have potential to be located in ecologically and visually sensitive areas adjacent to the banks of rivers and streams or along the coast.</p>					
<p>1.6 Examine how the destination will grow its volume of available accommodation stock to attract and retain visitors and ensure local economic impact from tourism.</p>	<p>This initiative will enhance tourism and result in positive effects on population.</p> <p>However, the new accomodation development presents potential uncertain environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure.</p>	<p><b>PHH</b> (PHH1, PHH2)</p>		<p><b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)</p>		<p><b>Yes</b></p>
<p>1.7 Develop the opportunity for the Cliff Coast to be recognised internationally for the quality and diversity of its marine tourism activities. Leveraging unique destination</p>	<p>This initiative will result in positive effects on population and human health by provision of enhanced visitor experience.</p> <p>However, in the absence of mitigation, the initiative could have the potential to result in negative or uncertain environmental effect on biodiversity, water quality, cultural</p>	<p><b>PHH</b> (PHH1, PHH2)</p>		<p><b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>MA</b> (MA1, MA2, MA3), <b>LV</b> (LV_1, LV2) <b>ANC</b> (ANC1, ANC2), <b>CH</b> (CH1, CH2)</p>		<p><b>Yes</b></p>

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opportunities such as Dolphin Watching.	heritage, land & soils, landscape and visual, material assets and air & noise. The development of new and existing marine tourism activities might result in negative environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. These types of infrastructure potentially will be located in ecologically and visually sensitive marine areas. These works can also potentially result in the spread of invasive species.					
<p><b>RTDS Strategic Objective 2: Raise the international profile of the Northern half of the Wild Atlantic Way to increase visitation and revenue.</b></p>	<p>This initiative will result in positive effects on population and human health by provision of enhanced visitor experience.</p> <p>However, in the absence of mitigation, the objective could have the potential to result in negative or uncertain environmental effect on biodiversity, water quality, cultural heritage, land &amp; soils, landscape and visual, material assets and air &amp; noise. Increased visitation could also result in increased visitor numbers and pressure in sensitive areas. Increased tourism in these locations would also require provision of welfare facilities, wastewater and waste management.</p>	<p><b>PHH</b> (PHH1, PHH2)</p>		<p><b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>MA</b> (MA1, MA2, MA3), <b>LV</b> (LV_1, LV2) <b>ANC</b> (ANC1, ANC2), <b>CH</b> (CH1, CH2)</p>		<p><b>Yes</b></p>

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<b>RTDS Strategic Objective 3: Increase tourism revenue, visitor dispersion and season extension across the Southern half of the Wild Atlantic Way</b>						
<p>3.1. Prepare the tourism industry and local communities for future opportunities provided by the capital investment in Greenways.</p>	<p>This goal will provide enhanced visitor experience and have positive effect to population and human health.</p> <p>However, in the absence of mitigation, the development of new and existing infrastructure presents a variety of potentially uncertain environmental effects to arise from both the construction and operation of such developments and/or their ancillary infrastructure. These types of infrastructure have potential to be located in ecologically and visually sensitive areas adjacent to the banks of rivers and streams or along the coast. This could also result in increased visitor numbers and pressure in sensitive areas.</p>	<p><b>PHH</b> (PHH1, PHH2)</p>		<p><b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)</p>		<p><b>Yes</b></p>
<p>3.2 Examine the enhancement of existing walking and cycling trails and regenerate them to become refreshed trails experiences that enable the visitor explore the destination.</p>	<p>The development of new and existing greenways, trails and walking and cycling routes, including those within and between existing destinations, has the potential to contribute to sustainable mobility, reduction in emissions and a better management of movements in sensitive areas, thereby benefiting various environmental</p>	<p><b>PHH</b> (PHH1, PHH2), <b>MA</b> (MA3)</p>		<p><b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>MA</b> (MA1, MA2), <b>CH</b> (CH1, CH2), <b>ANC</b> (ANC1, ANC2)</p>		<p><b>Yes</b></p>

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	<p>components including habitats at certain locations.</p> <p>The development of these projects, however, may result in uncertain environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. These types of infrastructure have potential to be located in ecologically and visually sensitive areas adjacent to the banks of rivers and streams or along the coast. This could also result in increased visitor numbers and pressure in sensitive areas.</p>					
<p>3.3 Develop the capacity of existing attractions to attract and disperse visitors across the Cliff Coast through enhancement of the visitor experience and repurposing of key sites to act as a catalyst for destination development.</p>	<p>This initiative will result in positive effects on population.</p> <p>However, in the absence of mitigation, the increase in capacity presents a variety of potentially uncertain environmental effects to arise from the use of these spaces and/or provision of ancillary infrastructure. This would also result in increased visitor numbers and pressure.</p>	<p><b>PHH</b> (PHH1, PHH2)</p>		<p><b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)</p>		<p><b>Yes</b></p>
<p>3.4 Build on thematic and product linkages between North Kerry and West Clare to</p>	<p>This initiative will enhance tourism opportunities for the county and have</p>	<p><b>PHH</b> (PHH1, PHH2)</p>		<p><b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1,</p>		<p><b>Yes</b></p>

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Strategic Objectives and Initiatives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required ? Yes / No
grow the number of saleable day time experiences available through the destination e.g. maritime, rural, food, culture and activities.	positive effect on population and human health.  However, the new experience development presents potential uncertain environmental effects that have the potential to arise from both the construction and operation of such experiences and/or their ancillary infrastructure.			LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)		
3.5 Grow the number of saleable visitor experiences (B2B and B2C) accessible across the destination supported by new approaches to packaging.	This initiative will enhance tourism opportunities for the county and have positive effect on population and human health.  However, the new experience development presents potential uncertain environmental effects that have the potential to arise from both the construction and operation of such experiences and/or their ancillary infrastructure.	<b>PHH</b> (PHH1, PHH2)		<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)		<b>Yes</b>
3.6 Examine how to develop authentic local community experiences to disperse visitors across the destination and meet local people through culture and heritage experiences.	This initiative will result in positive effects on population and human health by provision of enhanced visitor experience. However, in the absence of mitigation, the objective could have the potential to result in uncertain environmental effect on cultural heritage. The effect on the remaining environmental themes and SEOs will be neutral.	<b>PHH</b> (PHH1, PHH2)		<b>CH</b> (CH1, CH2)	<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>LV</b> (LV_1, LV2)	<b>Yes</b>

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<b>RTDS Strategic Objective 4: Protect the authenticity and “wildness” of the Wild Atlantic Way</b>						
4.1 Protect, sustain and enhance the natural environment of the CCDEDP area through the creation of new sustainable visitor experiences.	This initiative will result in positive effects across the majority of SEOs for environmental factors.  No negative or uncertain environmental effects arise.	<b>B</b> (B1, B2, B3), <b>PHH</b> (PHH1, PHH2), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>LV</b> (LV_1, LV2), <b>CH</b> (CH1, CH2)				<b>No</b>
4.2 Develop the international profile of the destination through its credibility as a responsible tourism area and the potential for ‘green’ experience innovation immersing visitors in responsible tourism experiences.	This initiative will support in raising awareness regarding sustainable tourism opportunities in North Kerry and West Clare.  No negative or uncertain environmental effects arise.	<b>PHH</b> (PHH1, PHH2)			<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>LV</b> (LV_1, LV2), <b>CH</b> (CH1, CH2)	<b>No</b>
4.3 Examine new opportunities throughout the Cliff Coast to build on world class sustainability and marine bio	This initiative will result in positive effects on population and human health by provision of enhanced visitor experience.	<b>PHH</b> (PHH1, PHH2)		<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>MA</b> (MA1, MA2, MA3), <b>LV</b>		<b>Yes</b>

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experiences e.g. dolphin watching.	However, in the absence of mitigation, the initiative could have the potential to result in negative or uncertain environmental effect on biodiversity, water quality, cultural heritage, land & soils, landscape and visual, material assets and air & noise. The development of new and existing marine tourism activities might result in negative environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. These types of infrastructure potentially will be located in ecologically and visually sensitive marine areas. These works can also potentially result in the spread of invasive species.			(LV_1, LV2) <b>ANC</b> (ANC1, ANC2), <b>CH</b> (CH1, CH2)		
<b>RTDS Strategic Objective 5: Enable and assist the industry to grow its capacity and capability so that it can thrive over the period of this strategy</b>						
5.1 Develop the capacity of the tourism industry to develop its online presence and commercial approach to online activity.	This initiative would result in positive effects for tourism industry and will not result in adverse environmental consequences.	<b>PHH</b> (PHH1, PHH2)			<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>LV</b> (LV_1, LV2), <b>CH</b> (CH1, CH2)	<b>No</b>



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5.2 Develop a new tourism clusters approach building on established networks and creating new tourism networks where none exist.	The development of new and existing tourism clusters might give rise to uncertain environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure.	<b>PHH</b> (PHH1, PHH2)		<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)		<b>Yes</b>
5.3 Build on the association of North Kerry as a family destination and develop the profile to attract domestic and international visitors.	This initiative will enhance tourism opportunities for families and will have positive effect on population and human health.  However, the new future development presents potential uncertain environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure.	<b>PHH</b> (PHH1, PHH2)		<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)		<b>Yes</b>
5.4 Work with the tourism industry to improve its capacity to deliver new and enhanced experiences aligned with the destination vision.	This initiative will provide enhanced visitor experience and have positive effect to population and human health.  However, in the absence of mitigation, the development of new and existing infrastructure presents a variety of potentially uncertain environmental effects to arise from both the construction and operation of such developments and/or their	<b>PHH</b> (PHH1, PHH2)		<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)		<b>Yes</b>

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Strategic Objectives and Initiatives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required ? Yes / No
	ancillary infrastructure. This could also result in increased visitor numbers and pressure.					
5.5 Develop the cultural opportunity across the Cliff Coast to create vibrant evening economy hubs for visitors.	<p>This initiative will enhance tourism opportunities for the county and have positive effect on population and human health.</p> <p>However, the new development presents potential uncertain environmental effects that have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure.</p>	<b>PHH</b> (PHH1, PHH2)		<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)		<b>Yes</b>
<b>RTDS Strategic Objective 6: Foster strong coalitions of industry and stakeholders with a common purpose in creating flourishing destinations and thriving communities.</b>						
6.1 Work with the OPW to enhance the visitor experience at key sites within the Cliff Coast.	<p>This objective will promote collaboration with OPW, support efficient delivery of tourism experiences across a range of sites and have positive effect on population and human health.</p> <p>No specific projects are associated with the statement, and therefore the effect on the remaining environmental themes and SEOs will be neutral.</p>	<b>PHH</b> (PHH1, PHH2)			<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>LV</b> (LV_1, LV2), <b>CH</b> (CH1, CH2)	<b>No</b>
6.2 Ensure tourism is integrated as a key element of	This initiative will enhance tourism opportunities for the counties and have	<b>PHH</b> (PHH1, PHH2)			<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b>	<b>No</b>

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Strategic Objectives and Initiatives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required ? Yes / No
future strategic development sites across North Kerry and West Clare to include future urban and rural regeneration activity.	positive effect on population and human health.  No negative or uncertain environmental effects arise.				(WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)	
6.3 Grow the number of tourism enterprises operating in the destination supported by an environment that encourages new levels of tourism entrepreneurship.	This goal will enhance tourism opportunities for the county and have positive effect on population and human health.  No negative or uncertain environmental effects arise.	<b>PHH</b> (PHH1, PHH2)			<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)	<b>No</b>
6.4 Develop sustainable transport options to engage with the Cliff Coast and new approaches to visitor management with sustainability at the core.	This initiative will enhance connectivity and have positive effect to population and human health.  However, in the absence of mitigation, the development of new and existing transport links, presents a variety of potentially uncertain environmental effects to arise from both the construction and operation of such developments and/or their ancillary infrastructure.	<b>PHH</b> (PHH1, PHH2)		<b>B</b> (B1, B2, B3), <b>LSG</b> (LSG1), <b>WQ</b> (WQ1, WQ2), <b>LV</b> (LV_1, LV2), <b>ANC</b> (ANC1, ANC2), <b>MA</b> (MA1, MA2, MA3), <b>CH</b> (CH1, CH2)		<b>Yes</b>

### 8.3 Environmental Assessment of the Catalyst Projects listed within the Draft Cliff Coast Destination & Experience Development Plan

The CCDEDP includes a list of catalyst projects and actions which will be delivered to support the above strategic objectives and initiatives of the DEDP. The environmental assessment of the effects of the catalyst projects and destination enablers is detailed in Appendix 1 of the SEA ER.

The projects/actions where there is a requirement for development of existing and new infrastructure might also give rise to uncertain environmental effects on other environmental themes and SEOs that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. Refer to Table 8.1 in Appendix 1 of the SEA ER for the detailed assessment of effects of the catalyst projects and actions.

### 8.4 The Interrelationship between Environmental Factors

An overview of the key and minor / no interaction between environmental factors with potential for effects arising from the CCDEDP are set out in the matrix in **Table 8.2**.

Actions within the Plan that give rise to positive or negative environmental effects for one environmental component also have the potential to generate positive or negative environmental effects for inter-related environmental components – e.g. negative effect on soils can have a negative effect on biodiversity, water, and / or landscape. Likewise, actions supporting the delivery of SuDS will improve water quality, which in turn can have a positive effect on aquatic ecology.

An assessment of impact inter-relationships and interactions is already embedded in the evaluation of environmental effects that has been carried out in this environmental report. This ensures that there is adequate coverage of all potential environmental effects associated with the implementation of plan actions. In addition the mitigation measures set out in **Section 9.0** of this Report.

**Table 8.2 Significant Interrelationships between Environmental Factors**

Component \ Effect	Biodiversity	Population & Human Health	Land, Soils & Geology	Water Quality	Air Quality, Noise and Climate	Material Assets	Cultural Heritage	Landscape & Visual
Biodiversity		☑	☑	☑	☑	☑	☒	☑
Population & Human Health	☑		☑	☑	☑	☑	☑	☑
Land, Soils & Geology	☑	☑		☑	☒	☑	☑	☑
Water Quality	☑	☑	☑		☒	☑	☒	☑
Air Quality, Noise and Climate	☑	☑	☒	☒		☑	☑	☒
Material Assets	☒	☑	☑	☑	☑		☒	☒
Cultural Heritage	☒	☑	☑	☒	☑	☑		☑
Landscape & Visual	☑	☑	☑	☑	☑	☑	☑	

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Component \ Effect	Biodiversity	Population & Human Health	Land, Soils & Geology	Water Quality	Air Quality, Noise and Climate	Material Assets	Cultural Heritage	Landscape & Visual
<b>Legend:</b> Key Interaction <input checked="" type="checkbox"/> Minor/No Interaction <input type="checkbox"/>								

### 8.5 Potential Cumulative Effects

Cumulative effects can be described as the addition of many small impacts to create one larger, more significant, impact.

There are 2 types of potential cumulative effects that have been considered, namely:

- Potential intra-Plan cumulative effects - these arise from the interactions between different types of potential environmental effects resulting from a plan, programme, etc. The interrelationships between environmental factors that help determine these potential effects are identified on **Table 8.2**.
- Potential inter-Plan cumulative effects - these arise when the effects of the implementation of one plan occur in combination with those of other plans, programmes, projects, etc.

The CCDEDP could have a relationship with other plans and programmes. However, these plans and programmes have also been subject to environmental assessment, including SEA and AA, for the purpose of preventing and mitigating potential negative environmental effects. **Table 8.3** lists the relevant plans and programmes that have potential for cumulative effects with the CCDEDP.

The assessment of cumulative effects above focused on national, regional and local plans, programmes, strategy and policy documents that have the potential to affect the same receiving environment that could be affected by the CCDEDP.

The Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029 sets out policies and objectives for land use, settlement strategy, sustainable development, transport, infrastructure, environmental protection, and management, cultural heritage, climate change, etc. for the study area. Other higher-level international, national and regional plans are integrated within the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029 and have been assessed as such. The CCDEDP will comply with the provisions set within the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029 which itself has been subject to standalone environmental assessment (SEA, NIR, etc.).

The assessment of cumulative effects concludes that the implementation of the CCDEDP will not result in direct, indirect or cumulative impacts which would have the potential to adversely affect the environment. Indeed the implementation of the CCDEDP has the potential for positive cumulative interactions in delivering on policies and objectives of higher level plans in relation to increased economic activity and employment and greater appreciation and understanding of natural heritage, cultural heritage and landscape.

Table 8.3 Potential Cumulative Effects with other Plans and Programmes

Plan, Programme etc.	Potential Cumulative effect	Likely Cumulative Effect
<p>National Planning Framework (NPF) Project 2040</p> <p>National Development Plan (NDP) 2021-2030 (<i>As part of Project Ireland 2040 the National Development Plan sets out the Government’s over-arching investment strategy and budget for the period 2021-2030</i>)</p>	<p>The SEA and AA processes carried out during the preparation of the National Planning Framework have ensured that the potential significant environmental impacts associated with implementation of the plan have been identified and that these impacts have been given appropriate consideration.</p>	<p>No</p>
<p>Southern Regional Spatial and Economic Strategy</p>	<p>The SEA and AA processes carried out during the preparation of the RSES have ensured that the potential significant environmental impacts associated with implementation of the RSES have been identified and that these impacts have been given appropriate consideration.</p>	<p>No</p>
<p>National CFRAMS Programme</p> <p>South- eastern Catchment Flood Risk Assessment and Management (CFRAM) Study</p>	<p>Catchment-based Flood Risk Assessment and Management (CFRAM) Studies and their product – Flood Risk Management Plans (FRMPs) – are at the core of national policy for flood risk management and the strategy for its implementation. These studies are required by The Floods Directive [2007/60/EC], which is being implemented in Ireland through the European Communities (Assessment and Management of Flood Risks) Regulations 2010 [S.I.122/2010]. Each FRMP is accompanied by an associated SEA Environmental Report and Natura Impact Statement. The SEA and AA processes carried out during the preparation of the FRMP have ensured that the potential significant environmental impacts associated with implementation of the FRMP have been identified and that these impacts have been given appropriate consideration.</p>	<p>No</p>
<p>National 4<sup>th</sup> Biodiversity Action Plan 2023-2030</p>	<p>The Biodiversity Action notes the requirements and purposes of AA and SEA and the vision of the plan to conserve and restored for the benefit of all sectors of society.</p>	<p>No</p>
<p>National Sustainable Mobility Policy (2022)</p>	<p>The policy sets a strategic framework to 2030 for active travel and public transport to support Ireland’s overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade. The projects which will be implemented as a result of this national policy will be subject to their individual environmental impact assessment and appropriate assessment processes (as appropriate) and hence there would be no potential adverse effects on the overall receiving environment.</p>	<p>No</p>

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Plan, Programme etc.	Potential Cumulative effect	Likely Cumulative Effect
River Basin Management Plan (RBMP) for Ireland 2022-2027	The SEA and AA processes carried out during the preparation of the RBMP have ensured that the potential significant environmental impacts associated with implementation of the Plan have been identified and that these impacts have been given appropriate consideration.	No
County Development Plans (Limerick Development Plan 2022-2028, Cork County Development Plan 2022-2028, Galway County Development Plan 2022-2028, Tipperary County Development Plan 2022-2028)	The County Development Plan (CDP) provides the principal planning strategy document for the development of a local authority area over the statutory time period of the plan. Each of the CDP within the Zone of Influence of the study area has been subject to SEA and AA processes to ensure that the potential significant environmental impacts associated with implementation of the Plan have been identified and that these impacts have been given appropriate consideration.	No
Regional Tourism Development Strategies 2023-2027 – Wild Atlantic Way Regional Tourism Development Strategy 2023-2027	The SEA and AA processes carried out during the preparation of the Strategy have ensured that the potential significant environmental impacts associated with implementation of the Strategy have been identified and that these impacts have been given appropriate consideration.	No

## 9 Mitigation Measures

### 9.1 Overview

The finding of the environmental assessment in **Section 8.0** (and Appendix 1) of this Environmental Report is that, if unmitigated, a number of the actions of the Cliff Coast Destination and Experience Development Plan have potential for uncertain or negative effects on aspects of the environment. These potential negative and / or uncertain effects, which derive from potential works resulting from the relevant action, focus primarily on biodiversity, water, cultural heritage, material assets and landscape. This section of the Environmental Report identifies measures for the mitigation and avoidance of potential uncertain or negative environmental effects.

### 9.2 Mitigation Measures

This Plan sits at the lower level of the hierarchy and must comply with relevant higher-level strategic actions / plans. These documents include plans and programmes, which have also been subject to their own environmental assessment processes, as relevant.

The projects included in this Plan will have to comply, as relevant, with the various provisions of legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licencing requirements as appropriate) that form the statutory decision-making and consent-granting framework, of which this Plan is not part and does not contribute towards. The Plan includes requirements for environmental protection and

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management including the ones set out in the *Regional Tourism Development Strategies 2023-2027* especially the *Wild Atlantic Way Regional Tourism Development Strategy*.

The majority of the mitigation measures are achieved through the detailed environmental protective policies and objectives as set out in the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029. The Development Plans provide for sustainable planning and management control of all development in North Kerry and West Clare – including the delivery of Destination Experience Development Plans through continued collaboration with Fáilte Ireland.

Proposals for development within the CCDEDP area must comply as appropriate with the relevant provisions included within the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029. Given that the CCDEDP sits within and at a lower level in the planning hierarchy, the measures contained to the Development Plans, and in their Natura Impact Report (NIR), SEA Environmental Report / SEA Statement and Strategic Flood Risk Assessment (SFRA) are applicable to the CCDEDP.

Therefore, the key environmental protection measures included in the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029, provide for appropriate and detailed mitigation of potential uncertain environmental effects of the CCDEDP.

These measures are detailed in the accompanying SEA ER.



## 10 Monitoring

### 10.1 Introduction

Monitoring of the CCDEDP and its implications on the environment is important to ensure that the environment is not adversely affected through the implementation of the Plan. In accordance with Article 10 of the SEA Directive, monitoring must be carried out of the significant environmental effects directly related to the implementation of the Plan *“in order to, inter alia, identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action.”*

Monitoring is based around indicators which allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives (**Section 6**) used in the assessment. Each indicator to be monitored is accompanied by the targets. The monitoring programme may be updated to deal with specific environmental issues - including unforeseen effects - as they arise. Such issues may be identified by the Council or identified to the Council by other agencies.

Fáilte Ireland is responsible for monitoring and the preparation of monitoring evaluation report(s), the publication of these reports and, if necessary, clear resolution plan will be produced with assigned responsibilities, timelines and monitoring to address environmental damage and cause of the same. It is recommended that the monitoring for the CCDEDP is undertaken utilising the outputs of monitoring and reviews of the Kerry and Clare Development Plans for efficiency and given that similar data sets will be used to measure the progress of each plan.

Environmental indicator assessment during monitoring can show positive / neutral impacts or negative impacts on the environment. Where an indicator value highlights a positive / neutral impact on the environment, it is likely that the objectives of the CCDEDP are well-defined with regard to the environment. Conversely where the objectives of the CCDEDP have a negative impact on the environment, it may be necessary to review the objectives of the CCDEDP or to take some other form of intervention. For example, if an objective is having a significant adverse impact, an amendment may be considered during the lifetime of the CCDEDP.

Refer to **Table 10.1** below for the monitoring programme set for the SEA which includes details on the indicators, targets and data sources to monitor the progress of the CCDEDP.

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Table 10.1 Environmental Monitoring Programme

SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
<b>Biodiversity (Flora &amp; Fauna) (B)</b>				
<b>B1</b>	Ensure compliance with the Habitats and Birds Directives with regard to the protection of Natura 2000 Sites and Annex habitats and species <sup>21</sup> and no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function.	Conservation status of habitats and species protected under European and International legislation.	Maintenance of favourable conservation status for habitats and species protected under European and International legislation to be unaffected by implementation of the Plan.	<p>Department of Culture, Heritage and the Gaeltacht's National Monitoring Report for the Birds Directive under Article 12 (every 3 years)</p> <p>Department of Culture, Heritage and the Gaeltacht report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every 6 years)</p> <p>Irish Wetland Bird Survey (I-WeBS) data.</p> <p>EPA State of the Environment reporting.</p> <p>Input from any other relevant Fáilte Ireland monitoring programmes.</p> <p>Lower tier environmental assessment and decision making by local authorities.</p>
<b>B2</b>	Preserve, protect, maintain and where appropriate enhance the terrestrial, aquatic and soil biodiversity, including internationally, EU and nationally designated sites, habitats and protected species.	Conservation status of habitats and species protected under International and National legislation.	Maintenance of favourable conservation status for all habitats and species protected under International and National legislation to be unaffected by implementation of the Plan.	<p>EPA State of the Environment reporting.</p> <p>Input from any other relevant Fáilte Ireland monitoring programmes.</p>

<sup>21</sup> 'Annexed habitats and species' refer to those listed under Annex I, II & IV of the EU Habitats Directive and Annex I of the EU Birds Directive.

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SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
<b>B3</b>	Ensure CCDEDP does not contradict biodiversity protection, restoration and rehabilitation objectives in the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029.	To comply with the biodiversity policies and objectives of the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029.	No contravention of the biodiversity policies and objectives of the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029.	Kerry & Clare County Council monitoring for likely significant environmental effects of the developments and compliance with policies and objectives of the CDP.
<b>Population &amp; Human Health (PHH)</b>				
<b>PHH1</b>	Promote sustainable high quality tourism within the County that supports economic development and maximises potential for employment and investment.	To comply with the tourism and economic development policies and objectives of the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029.	No contravention of the tourism and economic development policies and objectives of the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029.	Central Statistics Office (CSO) census data.  Lower tier environmental assessment and decision making by local authorities.  Input from any other relevant Fáilte Ireland monitoring programmes.
<b>PHH2</b>	Improve health and wellbeing by provision of recreational and tourism-related activities.	Occurrence of a spatially concentrated deterioration in human health arising from environmental factors resulting from the CCDEDP, as identified by the Health Service Executive (HSE) and / or Environmental Protection Agency (EPA).	No spatial concentrations of health problems arising from environmental factors as a result of the CCDEDP.	Publicly available data from HSE and EPA to be reviewed.  EPA State of the Environment reporting.  Lower tier environmental assessment and decision making by local authorities.  Input from any other relevant Fáilte Ireland monitoring programmes.
<b>Land, Soils &amp; Geology (LSG)</b>				

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SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
<b>LSG1</b>	Promote urban infill / brownfield development and protect land and soil resources from pollution and degradation.	Extent of conversion of land cover / green field to developed / artificial surfaces.	Contribute towards the target of the SEA for the National Planning Framework's (2018) to <i>"Maintain built surface cover nationally to below the EU average of 4%."</i>	CORINE mapping surveys (every 5 years). EPA State of the Environment reporting. Input from any other relevant Fáilte Ireland monitoring programmes.
<b>Water Quality (WQ)</b>				
<b>WQ1</b>	Protect, maintain and where necessary improve water quality and the management of watercourses, groundwater and the marine environment, in compliance with the requirements of the WFD objectives and measures.	<p>Classification of Overall Status (comprised of ecological and chemical status) under the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (S.I. No. 272 of 2009).</p> <p>Groundwater compliance with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC, subject to exemptions provided for by Article 4 of the WFD.</p> <p>Reference to EPA WFD Monitoring programme and status of surface waterbodies, groundwater bodies reported.</p>	No deterioration in the status of any groundwater or surface water, or adverse effect upon the ability of any groundwater or surface water to achieve 'good status' as a result of the CCDEDP.	<p>Information issued under the Water Framework Directive Monitoring Programme for Ireland (multi-annual).</p> <p>Review of WFD status of Bathing Waters, green flag / blue flag for beaches.</p> <p>EPA State of the Environment reporting.</p> <p>Input from any other relevant Fáilte Ireland monitoring programmes.</p>
<b>WQ2</b>	Implement and comply with the provisions of the Flood Risk Management and Sustainable Drainage Systems Guidelines to	Flood-related incidences related to the CCDEDP.	Compliance with the Flood Risk Management Guidelines and to ensure that any new	Lower tier environmental assessment and decision making by local authorities.

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SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
	avoid inappropriate development in areas at risk of flooding.		developments granted planning permissions are on appropriately zoned lands.	Input from any other relevant Fáilte Ireland monitoring programmes.  Review of planning applications for any new infrastructure to be accompanied by standalone flood risk assessment report in sensitive areas.
<b>Air Quality, Noise &amp; Climate (ANC)</b>				
<b>ANC1</b>	Maintain and promote continuing improvement in air quality and noise emissions through the reduction of emissions.	Demonstration of compliance with air quality and noise provisions.  Number of exceedances of ambient air quality standards in the County, as monitored under the EPA's National Ambient Air Quality Monitoring Network.	To maximise the amount of measures relating to air quality and noise minimisation being implemented.	EPA State of the Environment reporting.  Input from any other relevant Fáilte Ireland monitoring programmes.  Review of Kerry and Clare Air Quality Dashboard for air quality monitoring data results and EPA data for air quality monitoring.
<b>ANC2</b>	Contribute towards climate adaptation and mitigation and reduction of greenhouse gas emissions in line with National targets, including Ireland's commitment to realising a climate neutral economy by 2050.	Demonstration of compliance with provisions relating to climate adaptation and mitigation.	To maximise the amount of measures relating to climate adaptation and mitigation being implemented.	EPA State of the Environment reporting.  Input from any other relevant Fáilte Ireland monitoring programmes.
<b>Material Assets (MA)</b>				
<b>MA1</b>	To contribute towards the protection of public assets and infrastructure, ensure new developments are served with adequate and appropriate critical infrastructure with sufficient capacity (drinking water, wastewater, waste and	Number of incompatible developments (supported by the plan) adversely affecting existing or planned infrastructure, including water supply, wastewater	No incompatible development (supported by the plan) adversely affecting existing or planned material assets infrastructure.	Review of Annual Environmental Reports prepared by Uisce Éireann.  Review of publicly available data from EPA monitoring.  EPA State of the Environment reporting.

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SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
	transport) that does not present a danger to human health.	management, energy and transport infrastructure.		Input from any other relevant Fáilte Ireland monitoring programmes.
<b>MA2</b>	Promote sustainable waste management, minimisation and recovery.	<p>Tonnes of hazardous waste received at Council Waste Management Facilities annually.</p> <p>Tonnes of W.E.E.E. waste received at Council Waste Management Facilities annually.</p> <p>Tonnes of Bulky waste received at Council Waste Management Facilities annually.</p> <p>Tonnes of garden waste received at Council Waste Management Facilities annually.</p>	<p>Increase waste recycling in the County.</p> <p>Reduce waste generation in the County.</p>	<p>EPA State of the Environment reporting.</p> <p>Input from any other relevant Fáilte Ireland monitoring programmes.</p>
<b>MA3</b>	Promote sustainable transportation including increased use of public transport and active travel measures.	<p>% change in modal split.</p> <p>Kilometres of permanent segregated cycling network.</p> <p>Kilometres of permanent integrated cycling network.</p> <p>Number of Electric Vehicle charging points in the county.</p> <p>Total Area of road reallocated for sustainable alternatives.</p>	<p>Percentage increase in the number of public transport users in the Counties</p> <p>Increase kilometres of permanent segregated cycling network.</p> <p>Increase kilometres of permanent segregated cycling network.</p> <p>Increase number of Electric Vehicle charging points in the county. Increase Total Area of</p>	<p>Review delivery of sustainable transport projects via Kerry &amp; Clare County Council / NTA.</p> <p>Lower tier environmental assessment and decision making by local authorities.</p> <p>Input from any other relevant Fáilte Ireland monitoring programmes.</p>

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SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
			road reallocated for sustainable alternatives	
<b>Cultural Heritage (CH)</b>				
CH1	Protect and avoid impact on places, features and landscapes of cultural and archaeological importance, including entries to the Record of Monuments and Places (RMP).	Percentage of entries to the Record of Monuments and Places protected from significant adverse effects arising from the Plan.	No adverse effects on archaeological or cultural heritage resulting from implementation of the Plan.	Review of data available from National Monuments Section of Department of Housing, Local Government and Heritage.  Input from any other relevant Fáilte Ireland monitoring programmes.
CH2	Protect and avoid impact on places, features, buildings and landscapes of architectural heritage, (including entries to the Record of Protected Structures (RPS) and National Inventory of Architectural Heritage (NIAHs)).	Percentage of entries to the Records of Protected Structures and Architectural Conservation Areas and their context protected from significant adverse effects arising from the Plan.	No adverse effects on architectural heritage resulting from implementation of the Plan.	Lower tier environmental assessment and decision making by local authorities.
<b>Landscape &amp; Visual (LV)</b>				
LV1	To protect landscape character, minimise the loss of historic landscape features such as mature trees and hedgerows and scenic views.	Number of unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in Development Plans and other statutory land-use plans.	No unmitigated conflicts with the appropriate protection of statutory designations relating to the landscape, including those included in Development Plans and other statutory land-use plans.	Input from any other relevant Fáilte Ireland monitoring programmes.
LV2	Avoid impacts on the statutory landscape & visual designations as identified in the Kerry County Development Plan 2022-2028 and Clare County Development Plan 2023-2029.	Status of High Amenity Zones and Views and Prospects.  Number of developments permitted that result in	All action and development proposals supported by the plan must comply with policy objectives relating to the protection of High Amenity Zone	Input from any other relevant Fáilte Ireland monitoring programmes.

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SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
		avoidable adverse impacts on High Amenity Zones and Views and Prospects.	and Views and Prospects defined in the Development Plans. No development supported by the plan should have an adverse impact on High Amenity Zones and Views and Prospects.	Lower tier environmental assessment and decision making by local authorities.



## 11 References

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