

Ms Maeve Walsh
Fáilte Ireland
88-95 Amiens Street
Dublin 1

11th December 2017

Our Ref: SCP171103.1

Re: SEA Scoping for a 5-Year Strategy for Fáilte Ireland to support the development of Tourism in Ireland from 2018 to 2022

Dear Ms. Walsh,

I refer to and acknowledge your correspondence, dated 10th November 2017, in relation to the Strategic Environmental Assessment (SEA) Scoping for the proposed 5-Year Strategy for Fáilte Ireland to support the development of Tourism in Ireland from 2018 to 2022 (the Strategy).

EPA State of the Environment Report 2016

The link between environment and health/well-being is clearly highlighted in the EPA's most recent State of Environment Report *Ireland's Environment – An Assessment 2016* (EPA, 2016) - www.epa.ie/ebooks/soe2016/. That report acknowledges the important role of the environment and access to green and blue spaces in promoting health, wellbeing and quality of life, particularly in the context of an increasingly urbanised society. The proposed Strategy provides an opportunity to ensure that future tourism initiatives are planned, developed and managed in a sustainable and integrated manner that protects and enhances our natural heritage and maximises the co-benefits for society, the economy and the environment. This report can be consulted at: <http://www.epa.ie/irelandsenvironment/stateoftheenvironmentreport/>

Specific Comments

Key aspects to be considered are outlined below and should be considered in preparing the draft Strategy and SEA.

Potential environmental effects to consider include:

- **Water:** Increased visitor numbers may result in pressures on surface and ground waters due to increased demands on water supply and increased loadings to existing waste water treatment facilities. The environmental report should assess existing critical service infrastructure adequacy and capacity, to determine the level to which tourist numbers can be sustainably catered for.
- **Climate change:** The Strategy should be consistent with national commitments to reduce greenhouse gas emissions as outlined in Ireland's National Mitigation Plan. Cycling and walking initiatives (such as for example the Waterford, Great Western and Ulster Canal Greenways) should be promoted to encourage longer duration stays while offering non-fossil fuel based transport alternatives. With regards to climate adaptation, the Strategy should take into consideration the predicted impacts of climate change and be consistent with the National Adaptation Framework and relevant sectoral, regional and local adaptation plans.
- **Traffic:** With potential increases in tourism-related traffic associated with the Strategy, the Strategy should consider potential impacts on existing tourism corridors to determine whether road improvements and more frequent maintenance regimes may be required. We recommend that the Strategy should support the use of non-fossil fuel based modes of transport and public transport where feasible and support initiatives to encourage electrifying existing transport infrastructure to offer tourists more sustainable transport alternatives.

- **Communities and Settlements:** The Strategy has the potential to impact on existing settlements due to increased traffic and visitor numbers but it also has potential to offer opportunities for rural communities to benefit from tourism. We recommend that the Strategy should promote and support environmentally sustainable rural tourism.
- **Biodiversity** – Eco-tourism initiatives should be provided for within the Strategy. Other aspects such as biosecurity, invasive species management and control (particularly from boating/water-based tourism initiatives), possible degradation of wild areas from littering, or damage to protected habitats or geological heritage (Burren for example) etc. should also be considered in preparing the Strategy and SEA.
- **Existing green and blue infrastructure and ecological corridors** should be protected and where possible enhanced in any initiatives that may arise out the Strategy, to ensure there are no adverse impacts on natural heritage.
- **The appropriate assessment** should identify any SPAs/SACs whose integrity could be affected either by the Strategy itself or cumulatively/in combination with other plans and programmes. Potential transboundary impacts should also be considered in consultation with the relevant authorities.

Environmental Baseline

- The attached SEA Scoping Guidance document contains useful updated environmental resources to consider as appropriate and relevant to the Strategy.

Relationship with other plans and programmes

Some significant plans to consider include:

- Draft National Planning Framework (DHPLG)
- Regional Spatial and Economic Strategies (in preparation)
- Water Services Strategic Plan, Capital Investment Plan and Draft National Water Resources Plan (in preparation) (Irish Water)
- National Mitigation Plan (DCCAIE)
- Draft National Adaptation Framework (DCCAIE)
- Draft National River Basin Management Plan for Ireland (DHPLG)
- National Landscape Strategy (DCHG)
- National Biodiversity Action Plan (DCHG)
- Proposed National Greenways Strategy (DTTAS)
- Rural Development Programme (DAFM)

Other key national / regional plans to consider are included in Appendix II of the attached SEA scoping guidance document.

Monitoring Considerations

The SEA Environmental Report should refer to any relevant monitoring on the impacts of tourism initiatives currently underway, such as the Wild Atlantic Way or any relevant cross-border tourism initiatives.

Scoping Process Guidance

Guidance on the SEA Scoping Process, including regularly updated environmental Integration Guidance, an SEA Checklist, list of SEA Spatial Information Sources, an SEA Pack and guidance on *Integrating Climate Change into SEA* (EPA, 2015), is available on the EPA website and should be considered in the preparation of the SEA. This can be consulted at the following address: www.epa.ie/pubs/advice/ea/

Guidance on *Developing and Assessing Alternatives in SEA* (EPA, 2015) is also available at: www.epa.ie/pubs/advice/ea/developingandassessingalternativesinsea.html

The EPA recently published the findings of a project ‘*Demand for Water-Based Leisure Activity: The Benefits of Good Water Quality*’, to determine how water based recreational activities in Ireland are affected by differences in water quality across recreational sites. This research identifies how recreational water users are impacted by water quality and puts a value on the recreational benefits of water amenities. It may be useful to consider in preparing the Draft Strategy and the SEA Environmental Report. It can be consulted at:

www.epa.ie/pubs/reports/research/water/research232.html

Environmental Authorities

Under the SEA Regulations (S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011), notice should be given to the following:

- The Minister for Housing, Planning and Local Government
- Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears to the competent authority that the plan or programme, or modification to the plan or programme, might have significant effects on fisheries or the marine environment
- where it appears to the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, the Minister for Culture, Heritage and the Gaeltacht.

We will provide additional comments upon receipt of the Draft Environmental Report and Strategy and associated documents during the next statutory consultation phase of the SEA Process.

Should you have any queries or require further information in relation to the above, please contact the undersigned. I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours Sincerely,



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