

SEA STATEMENT

The Lough Derg VEDP (2020-2024)

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1.0 Introduction

This is the Strategic Environmental Assessment (SEA) Statement for the Lough Derg Visitor Experience Development Plan (VEDP) prepared by Tipperary County Council.

Lough Derg is set in beautiful countryside, encompassing an attractive blend of mountain and lakeshore, woodlands and farms. It is bookended by Portumna in the north and Killaloe-Ballina in the south, each offering a range accommodation, activities and visitor services. Covering 32,000 acres of waterway, Lough Derg is ideal for all kinds of water sports, cruising and angling, as well as excellent walking and cycling facilities, supported by visitor services in villages such as Terryglass, Dromineer, Garrykennedy, Mountshannon, Killaloe and Ballina.

The Lower Shannon, incorporating Lough Derg, is one of three “Discovery Zones” in the recently adopted Tourism Masterplan for the Shannon Region. The Lough Derg region also includes the long distance Beara Breifne Way which is one of Ireland’s Hidden Heartlands’ “transformational signature products of scale”. This strongly positions Lough Derg within a context of emerging national strategies and significant long-distance trails and greenways connecting Lough Derg to the whole Shannon region. ‘Ireland’s Hidden Heartlands’ promises to bring to life the Midlands’ rich natural assets including its many lakes, walkways and blueways, leveraging a growing tourism trend for outdoor activities by encouraging visitors to be ‘active in nature’. At present the region has just a 3% share of overnight stays by overseas visitors to Ireland and a 3% share of overnight stays by domestic visitors. Fáilte Ireland’s projected growth of future visitor numbers of c. 1.19 million to the Ireland’s Hidden Heartlands region by 2030 will result in an additional 304,000 additional visitors to the region.

This VEDP continues the integrated approach to destination development forged by the 2014-2017 Lough Derg Road Map. The cross-agency approach to co-ordinated investment in the area has positioned the Lough Derg region to fulfil a key role in the new Ireland’s Hidden Heartlands national brand experience. The core focus of this VEDP is Lough Derg itself - the waters, islands, lakeshore and lakeside settlements. The success of the lake region, however, depends on a connected network of visitor experiences across a geography stretching from Limerick in the south to Nenagh and Cloughjordan in the east, as far as Meelick and Banagher to the north and including East Clare and the Slieve Aughty mountains.

1.1 SEA Definition

Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme before the decision is made to adopt the plan or programme. The purpose 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*”¹

1.2 Legislative Context

European Parliament Directive 2001/42/EC, and European Council decision 27th June 2001, hereafter known as the SEA Directive was introduced a requirement for SEA to be carried out on all Plans and Programmes across multiple sectors, including tourism. The SEA Directive is to assess the effects of these Plans and Programmes on the environment.

The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (S.I. No. 435 of 2004). These statutory instruments have been in operation since 21st July 2004. Further amendments to these statutory

¹ EU, Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment, Article 1

instruments have occurred through the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (SI No. 200 of 2011).

The SEA Directive and the statutory instruments that transpose it into Irish Law require that upon the completion of a Plan, the competent authority must make a Statement available to both the public and all competent environmental authorities. This statement is known as the SEA Statement.

In relation to information on the decision, Article 16 of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (S.I. No. 435 of 2004) states that

16. (1) As soon as practicable after the adoption of a plan or programme, or modification to a plan or programme, the competent authority shall—

(a) send notice of adoption of, and a copy of, the plan or programme, or modification to a plan or programme, and a copy of the statement referred to in sub-article (2)(b) to the environmental authorities specified in article 9(5), as appropriate, and

(b) publish notice of the adoption of the plan or programme, or modification to a plan or programme, in at least one newspaper with a sufficiently large circulation in the area covered by the plan or programme, or modification to a plan or programme.

(2) A notice under sub-article (1)(b) shall state that

(a) a copy of the plan or programme, or modification to a plan or programme, is available for inspection at a stated place or places and at stated times and a copy shall be kept available for inspection accordingly, and

(b) a statement is also available for inspection which summarises—

(i) how environmental considerations have been integrated into the plan or programme, or modification to a plan or programme,

(ii) how

(I) the environmental report prepared pursuant to article 12,

(II) submissions and observations made to the competent authority in response to a notice under article 13, and

(III) any consultations under article 14, have been taken into account during the preparation of the plan or programme, or modification to a plan or programme,

(iii) the reasons for choosing the plan or programme, or modification to a plan or programme, in the light of the other reasonable alternatives dealt with, and

(iv) the measures decided upon to monitor, in accordance with article 17, the significant environmental effects of implementation of the plan or programme, or modification to a plan or programme.

1.3 Content of the SEA Statement

The SEA Statement must include information on how the environmental report prepared pursuant to article 12, the submissions and observations made to the competent authority in response to a notice under article 13, and any consultations under article 14, have been taken into account during the preparation of the plan or programme, or modification to a plan or programme.

It must also give the reasons for choosing the plan or programme, or modification to a plan or programme, in the light of the other reasonable alternatives dealt with, and the measures decided upon to monitor, in

accordance with article 17, the significant environmental effects of implementation of the plan or programme, or modification to a plan or programme.

1.4 How environmental considerations have been integrated into the Lough Derg VEDP

The SEA process is comprised of the following principle steps:

1. **Stage 1 Screening:** Decision on whether or not an SEA is required;
2. **Stage 2 Scoping** Consultation with the defined statutory bodies on the scope and level of detail to be considered in the assessment;
3. **Stage 3 Environmental Assessment** An assessment of the likely significant impacts on the environment as a result of the Lough Derg VEDP, leading to the production of an Environmental Report;
4. **Stage 4 Consultation** on the Draft Lough Derg VEDP and associated Environmental Report;
5. **Stage 5 Evaluation of the submissions and observations** made on the Draft Lough Derg VEDP for the Shannon Region and Environmental Report prior to finalising the Lough Derg VEDP;
6. **Stage 6** Issuance of an **SEA Statement** identifying how environmental considerations and consultation have been integrated into the Lough Derg VEDP.

Environmental Considerations were integrated throughout the VEDP at all stages and particularly as a result of

- **Stage 2** Scoping Consultations with environmental authorities under Article 13;
- **Stage 3** Communications of environmental considerations with the VEDP team and the integration of environmental considerations into the VEDP.
- **Stage 4** Public consultation under article 14.

1.5 Stage 2, Scoping Consultation with Environmental Authorities under Article 13

A scoping letter was prepared in February 2020 in order to advise statutory consultees that the Lough Derg VEDP was being prepared and that SEA would be carried out. It also invited submissions or observations in relation to the scope and level of detail of the information to be included in the environmental report. The purpose of the scoping stage is to ensure the identification of relevant environmental issues, so they could be addressed appropriately in the Environmental Report. The scoping stage also helped to establish the level of detail necessary for the SEA of the VEDP.

A significant level of consultation was also undertaken with key stakeholders, local authorities, statutory authorities, tourism sector representatives and interested parties was carried out prior to preparing the Draft VEDP. This consultation is summarised at the outset of the VEDP.

1.5.1 Statutory Consultees for SEA

The SEA Directive 2001/42/EC was transposed into Irish Law through S.I. 435/2004. In Article 9 (5) of SI 435/2004, a list of statutory consultees is given:

- (a) The Environmental Protection Agency
- (b) Minister of the Environment, Heritage and Local Government
- (c) Minister of Communications, Marine and Natural Resources

Department names have changed since the transposition of the SEA directive into Irish Law, therefore the statutory consultees for the SEA as of 2019 are:

- Environmental Protection Agency
- Minister for Communications, Climate Action and Environment
- Minister for Housing, Planning and Local Government
- Minister for Agriculture, Food and the Marine)
- Minister for Culture Heritage and the Gaeltacht.

Feedback from these statutory consultees is provided below.

Table 1: Record of Scoping Submissions Received

Agency	Interest	Issues Raised
Environmental Protection Agency	Statutory Environmental Agency	Issues raised include Infrastructure, transport, climate change resilience, biodiversity, ecosystem services and green infrastructure, water quality, invasive alien species control and management, landscape, assessment of likely significant effects.
Department of Communications, Climate Action and Environment (Geological Survey Ireland)	Government Department (the national earth science agency)	Overarching concerns include Geoheritage, Groundwater, Geohazards, Geothermal Energy, Natural Resources (Minerals/Aggregates).

1.5.2 How Comments were integrated into the Draft VEDP

Table 2 Summary of Scoping Consultation Responses

	Respondee	Concerns	Detail	Recommendations
1	Environmental Protection Agency	Infrastructure	The SEA should assess the potential additional pressures (including seasonal variations) on existing critical infrastructure (drinking water, wastewater, waste, transport) servicing areas associated with any projected increased visitor numbers. An increase in visitor numbers may have the potential to result in pressures on both surface waters and groundwaters due to increased demands on water supply and increased loadings to existing wastewater treatment facilities.	Should there be a need to construct additional ancillary developments, this should also be captured in the SEA. This would provide a better indication of the nature and possible scale of impacts that could be expected.
		Transport	The SEA should assess, and in turn seek to avoid, reduce and mitigate where necessary, the potential environmental effects of a likely increase in tourism-related traffic volumes along any routes resulting from implementation of the Plan. The need for additional parking during peak season and any required road improvements / road maintenance associated with increased traffic volumes, should be assessed in collaboration with the relevant stakeholders.	Possible alternative traffic management scenarios should also be considered. The Plan should promote proper and sustainable tourism related developments and ensure that the requirements of relevant environmental legislation are reflected, as relevant and appropriate, in any plans/projects that may arise in implementing the Plan.

	Respondee	Concerns	Detail	Recommendations
			<p>The provision of charging infrastructure for electric vehicles in designated parking spots should be prioritised, in collaboration with the relevant stakeholders. It would be useful to describe the range of works likely to be involved in implementing the Plan, including aspects such as the provision of signage, discovery point information (e.g. installation of interpretative panels), etc.</p>	
		<p>Climate change resilience</p>	<p>You should ensure that the Plan is aligned with national commitments on climate change mitigation and adaptation, as well as relevant sectoral, regional and local adaptation and mitigation plans. Specific climate-related actions or objectives should be included in a specific chapter/section in the Plan.</p> <p>The SEA should consider how resilient the various elements of the Plan (and associated infrastructure) are to the effects of climate change, including impacts arising from prolonged dry/wet spells, increased storm conditions, flooding, soil erosion, etc.</p>	<p>The SEA should could consider the following guidance documents: <i>Local Authority Adaptation Strategy Development Guideline</i>, EPA Research, Report No. 164; <i>Integrating Climate Factors into the Strategic Environmental Assessment Process in Ireland</i>, EPA; and <i>Sectoral Planning Guidelines for Climate Change Adaptation</i>, Department of Communications, Climate Action and the Environment.</p> <p>The Plan should include clear actions/measures which will contribute to the sector reducing its overall carbon footprint. Consideration could be given to the development of relevant initiatives to achieve this within the Plan.</p>

	Respondee	Concerns	Detail	Recommendations
		Biodiversity	The Plan should include a specific action / objectives and commitments to protect designated habitats and protected species (and associated ecological corridors/linkages) within and adjacent to the Plan area.	The SEA should consider the following guiding document: <i>Integrated Biodiversity Impact Assessment Streamlining AA, SEA and EIA Processes Best Practice Guidance</i> , EPA, Strive Report, No.90.
		Ecosystem Services and Green Infrastructure	<p>There is merit in considering adopting an ecosystem services approach to the relevant aspects of the SEA. The Plan area supports a significant ecological resource, with associated ecosystem services, that can benefit local communities and the local economy, while also protecting environmental sensitivities and vulnerabilities.</p> <p>In implementing the Plan, tourism-related development and associated activities should be managed in a manner that avoids or minimises the potential for significant disturbance to habitats and species. This could also be strengthened by highlighting the need for a “green infrastructure first” approach and provision of guiding advice on how to implement green infrastructure as part of development plans.</p>	<p>The Plan should include a section that recognises the ecosystem services in the Plan area.</p> <p>The Plan should consider a commitment to mapping the services within the key destination sites and associated catchment zones/usage areas within and in the zone of influence of the destination areas/sites.</p> <p>Refer to guidance detailed in <i>Ireland’s Environment, An Assessment 2016</i>, EPA.</p>

	Respondee	Concerns	Detail	Recommendations
			<p>High-quality green and blue spaces are important not just for nature but for peoples' health & wellbeing, particularly in the context of an increasingly urban society and increasing settlement densities.</p>	
		Water Quality	<p>Protection of surface and ground water resources is of vital importance both for human health and ecosystems. In this context, the Plan should provide clear commitments to protect both surface water (including rivers, lakes and estuaries), groundwater and their associated habitats and species, including fisheries, within and adjacent to the Plan area.</p> <p>The Plan should also ensure that any specific relevant objectives and measures for individual water bodies within the Plan area, (and the subsequent third cycle RBMP), are considered, when considering tourism (and ancillary) related developments, to ensure water quality is protected/improved/maintained.</p> <p>An assessment should be undertaken to determine whether any proposals and associated development could be potentially in conflict with the overall</p>	<p>Refer to <i>Water Quality in Ireland 2010 – 2015</i>, EPA; <i>Lower Shannon (Lough Derg) Catchment Assessment 2010 - 2015, Version 3</i>, Catchment Science and Management Unit, EPA; and <i>River Basin Management Plan for Ireland 2018 - 2021</i>, Government of Ireland.</p>

	Respondee	Concerns	Detail	Recommendations
			<p>Water Framework Directive River Basin Management Plan Principal Actions including the Areas for Action. Any proposals which are identified to be in potential conflict with the River Basin Management Plan and WFD objectives, should be re-examined with a view to ensuring the conflicts are removed through a suitable strategy of avoidance and/or mitigation as appropriate.</p>	
		<p>Invasive Alien Species Control and Management</p>	<p>Control and management of invasive alien species should be taken into account in the planning, construction, and carrying out of maintenance activities (e.g. hedgerow cutting, road or development works) associated with implementing the Plan.</p>	<p>A commitment should be included to ensure that implementation of the Plan minimises the risk of the spread of invasive species.</p>
		<p>Landscape</p>	<p>The Plan should consider available Local Authority landscape character assessments, and available habitat mapping of the Plan area.</p>	<p>In preparing the Plan and SEA, landscape sensitivity should be considered.</p>
		<p>Assessment of Likely significant effects</p>	<p>The assessment should identify and focus on the key relevant environmental aspects of the Plan. The full range of environmental effects (secondary, cumulative, synergistic, short, medium and long term, permanent, temporary, positive and negative) should also be considered in the SEA.</p>	<p>Refer to <i>Good Practice Guidance on Cumulative Effects Assessment in Strategic Environmental Assessment</i>, EPA. The methodology applied in the assessment of the preferred alternative, along with any assumptions made, should be described. Where possible and practical, quantitative assessments</p>

	Respondee	Concerns	Detail	Recommendations
			The potential for cumulative effects associated with the implementation of the Plan should be considered, in association with other relevant Plans / Programmes and projects within and adjacent to the Plan area.	should be undertaken of the assessment of the preferred alternative/ combination of alternatives.
		Additional plans/programmes		Have regard to: Draft National Marine Planning Framework; National Greenways Strategy; National Rural Development Programme; Regional Spatial and Economic Strategies; Regional and Metropolitan Area Transport Strategies; Sectoral and Local Authority Climate Adaptation Plans; Catchment Flood Risk Management Plans and associated flood risk mapping.
2	Department of Communications Climate Action and Environment	Geo Heritage	GSI's records show that there are multiple County Geological Sites (CGSs) in the vicinity of the Lough Derg Visitor Experience Development Plan region within counties Tipperary, Galway and Clare.	Attention should be paid to these CGS sites which have been afforded protection and promotion in the respective County Council Development Plans and more specifically for Tipperary as stated in the Policy AEH6 and HER30

	Respondee	Concerns	Detail	Recommendations
	(Geological Survey Ireland)			of South and North Tipperary County Development Plans, respectively.
Groundwater		Groundwater is important as a source of drinking water, and it supports river flows, lake levels and ecosystems. It contains natural substances dissolved from the soils and rocks that it flows through, and can also be contaminated by human actions on the land surface. As a clean, but vulnerable, resource, groundwater needs to be understood, managed and protected.	Environmental Report to refer to GSI Groundwater Programme, regarding groundwater quality, quantity and distribution. Geological Survey Ireland monitors groundwater nationwide by characterising aquifers, investigating karst landscapes and landforms and by helping to protect public and group scheme water supplies. With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands. Refer to GSI's National Aquifer and Recharge maps on the Map viewer to this end.	
Geohazards		Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides are the most prevalent of these hazards. It is recommended that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.	Refer to GSI's Map Viewer which has information available on past landslides for viewing as a layer.	

	Respondee	Concerns	Detail	Recommendations
		Geothermal Energy	Geothermal energy harnesses the heat beneath the surface of the Earth for heating applications and electricity generation, and has proven to be secure, environmentally sustainable and cost effective over long time periods. Geothermal applications can range in depth from a few metres below the surface to several kilometres. Ireland has widespread shallow geothermal resources for small and medium-scale heating applications, which can be explored online.	Refer to GSI’s Geothermal Suitability maps for both domestic and commercial use. It is recommend that these maps determine the most suitable type of ground source heat collector for use with heat pump technologies. Ireland also has recognised potential for deep geothermal resources. GSI currently supports and funds research into this national energy resource.
		Natural Resources (Minerals/Aggregates)	GSI is of the view that the sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required. GSI highlights the consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process. Aggregates are an essential natural resource for the construction industry and with the Government of Ireland “Building Ireland 2040” plan, understanding of aggregate source and supply will be important.	It is encouraged to reference to aggregate quality and quantity in relation to the projected public developments, such as roads, infrastructure etc. for the Development Plan. GSI provides data, maps, interpretations and advice on matters related to minerals, their use and their development found within the Minerals section of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on the Map Viewer.

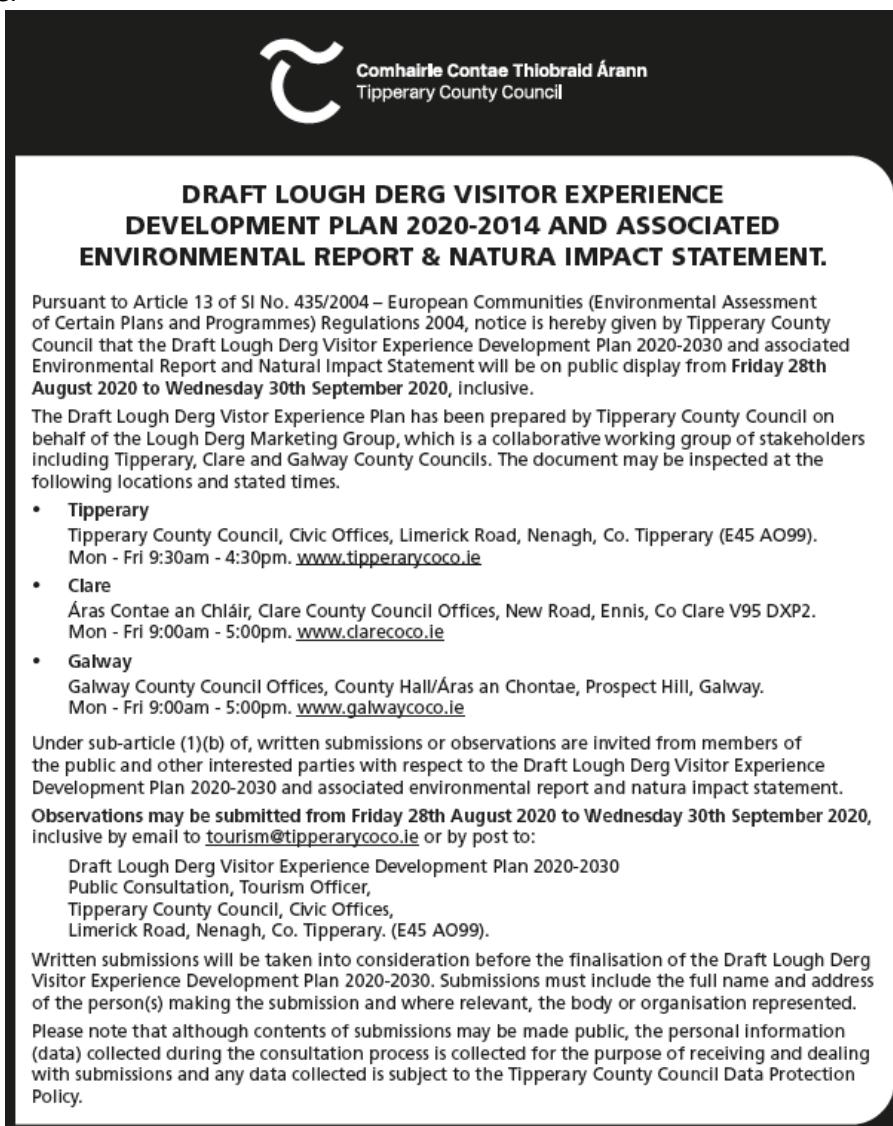
1.6 Stage 4, Consultation on the Draft VEDP and Environmental Report under Article 14


An Environmental Report in compliance with the European Union SEA Directive (2001/42/EC) and related government guidelines was prepared and placed on public display with the draft Draft Lough Derg VEDP. The purpose of this report was to provide information on any existing environmental problems in the study area, to set out the likely significant effects of the VEDP on the environment and possible mitigation measures with a view to improving the environmental performance of the VEDP.

The findings of the SEA are presented in an Environmental Report which accompanied the Draft Lough Derg VEDP.

1.7 Submissions and Observations on the Draft VEDP 2020- 2024 and Environmental Report

The *Draft Lough Derg VEDP 2020 -2024* and associated an Environmental Report and an Appropriate Assessment pursuant to Article 6 of the Habitats Directive 92/43/EEC went on public display from Friday 28th August 2020 to Wednesday 30th September 2020. The following public notice was published in the *Clare Champion* and the *Connacht Tribune*.



 **Comhairle Contae Thiobraid Árann**
Tipperary County Council

DRAFT LOUGH DERG VISITOR EXPERIENCE DEVELOPMENT PLAN 2020-2030 AND ASSOCIATED ENVIRONMENTAL REPORT & NATURA IMPACT STATEMENT.

Pursuant to Article 13 of SI No. 435/2004 – European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, notice is hereby given by Tipperary County Council that the Draft Lough Derg Visitor Experience Development Plan 2020-2030 and associated Environmental Report and Natural Impact Statement will be on public display from **Friday 28th August 2020 to Wednesday 30th September 2020, inclusive.**

The Draft Lough Derg Visitor Experience Plan has been prepared by Tipperary County Council on behalf of the Lough Derg Marketing Group, which is a collaborative working group of stakeholders including Tipperary, Clare and Galway County Councils. The document may be inspected at the following locations and stated times.

- **Tipperary**
Tipperary County Council, Civic Offices, Limerick Road, Nenagh, Co. Tipperary (E45 AO99).
Mon - Fri 9:30am - 4:30pm. www.tipperarycoco.ie
- **Clare**
Áras Contae an Chláir, Clare County Council Offices, New Road, Ennis, Co Clare V95 DXP2.
Mon - Fri 9:00am - 5:00pm. www.clarecoco.ie
- **Galway**
Galway County Council Offices, County Hall/Áras an Chontae, Prospect Hill, Galway.
Mon - Fri 9:00am - 5:00pm. www.galwaycoco.ie

Under sub-article (1)(b) of, written submissions or observations are invited from members of the public and other interested parties with respect to the Draft Lough Derg Visitor Experience Development Plan 2020-2030 and associated environmental report and natura impact statement. **Observations may be submitted from Friday 28th August 2020 to Wednesday 30th September 2020, inclusive by email to tourism@tipperarycoco.ie or by post to:**

Draft Lough Derg Visitor Experience Development Plan 2020-2030
Public Consultation, Tourism Officer,
Tipperary County Council, Civic Offices,
Limerick Road, Nenagh, Co. Tipperary. (E45 AO99).

Written submissions will be taken into consideration before the finalisation of the Draft Lough Derg Visitor Experience Development Plan 2020-2030. Submissions must include the full name and address of the person(s) making the submission and where relevant, the body or organisation represented. Please note that although contents of submissions may be made public, the personal information (data) collected during the consultation process is collected for the purpose of receiving and dealing with submissions and any data collected is subject to the Tipperary County Council Data Protection Policy.

Table 3 Summary of Submissions at the Draft Stage of the Lough Derg VEDP

NO	RESPONDENT	Submission Summary:	Consideration
1	EPA	<p>The following points were raised in the submission:</p> <ol style="list-style-type: none"> 1) The EPA is one of five statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans. 2) Tipperary County Council should also ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Regional Spatial and Economic Strategy. 3) Biodiversity Considerations: While welcoming the application of the VICE model for sustainable tourism development, the natural heritage of the Plan area could be recognised to a greater extent in the Plan. Highlighting the various references and commitments to sustainable practices and environmental protection under a dedicated environmental chapter or subchapter would benefit the Plan. The important ecosystem services and designated sites / protected species within the Plan area can be harnessed in an appropriate manner to enhance eco-tourism. It is also important to raise awareness of the need for tourism and related activities to maintain and protect the significant environmental resources of the area. 4) Traffic Management: We note the various references to proposed traffic management upgrades in urban areas within the Plan and the promotion of walking and cycling initiatives. The Plan should consider the need for effective traffic management as a whole within the Plan area and examine the feasibility of a traffic management plan in this regard. There is merit in promoting greater use of electronic vehicles for tourism related travel and support efforts to increase available charging infrastructure. 5) Non-Technical Summary. There is merit in including selected relevant tables and figures from the SEA Environmental Report in the NTS. In particular, the inclusion of Figure 1 	<ol style="list-style-type: none"> 1) Integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed. 2) Policy consistency - complete 3) Natural heritage of the Plan area could be recognised to a greater extent in the Plan. Included on page 11, a dedicated environmental chapter or subchapter will be included in recommending chapter 7 measuring success. 4) Traffic management as a whole within the Plan area and examine the feasibility of a traffic management plan in this regard. There is merit in

NO	RESPONDENT	Submission Summary:	Consideration
		<p>Lough Derg VEDP Area, Figure 3 VEDP Environmental Constraints and Table 15 Indicative Monitoring Framework, could be considered.</p> <p>6) Critical Infrastructure Provision. We note the references to future upgrade works required to existing critical service infrastructure within the Plan area. The Plan should recognise the need for adequate and appropriate wastewater and drinking water infrastructure to be put in place to service any infrastructural development associated with Plan-related projects, in the interests of protecting both the environment and public health.</p> <p>7) Monitoring. The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. If the monitoring identifies adverse impacts during the implementation of the Plan, Tipperary County Council should ensure that suitable and effective remedial action is taken. The Plan should include a commitment to publishing monitoring reports (e.g. annually/mid-term) during the lifetime of the Plan, to support effective evaluation of the Plan’s environmental performance. A commitment to monitoring visitor numbers and to incorporate this into the Plan-implementation and SEA-related monitoring and associated activities, with a view to assessing the potential environmental effects which may occur with increased tourism numbers, should also be considered. While we note the proposed monitoring framework outlined in Table 15 Indicative Monitoring Framework,. Along with the various data sources, we suggest that the Framework should also include information on monitoring frequencies, where possible.</p> <p>8) Mitigation Measures. A clear commitment should be included in the Plan to fully implement the findings, recommendations and mitigation measures arising from the SEA and Appropriate Assessment (AA), in implementing the Plan. The Plan, and any projects arising out of the Plan, should be aligned with the high-level environmental commitments contained in the National Planning Framework and Regional Spatial and Economic Strategies, as relevant and appropriate to the Plan.</p> <p>9) Climate Change/Climate Action. We note the numerous references to Climate Change/Climate Action in the context of other Plans and Programmes which were assessed. Consideration could be given to including greater detail on the relevant</p>	<p>promoting greater use of electronic vehicles for tourism related travel and support efforts to increase available charging infrastructure.</p> <p>Mitigation added in Chapter 07.</p> <p>5) Non technical summary. selected relevant tables and figures from the SEA Environmental Report</p> <p>6) Noted and included</p> <p>7) Monitoring report – regularity of monitoring to be agreed.</p> <p>8) Mitigation measure included in chapter 07 of the VEDP</p> <p>9) Climate change reference included in chapter 07 of the VEDP.</p> <p>10) Identify key issues and challenges described in the EPAs most recent State of the Environment report - included in finalised ER</p>

NO	RESPONDENT	Submission Summary:	Consideration
		<p>initiatives which might contribute to the sector reducing its overall carbon footprint in the context of the Lough Derg Plan.</p> <p>10) State of the Environment Report – Ireland’s Environment 2016. In finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in our most recent State of the Environment Report Ireland’s Environment – An Assessment 2016 (EPA, 2016) should be considered, as relevant and appropriate.</p> <p>11) Future Amendments to the Plan: You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan.</p> <p>12) SEA Statement – “Information on the Decision”. Once the Plan is adopted, you should prepare an SEA Statement that summarises:</p>	<p>11) Screening table to be included in finalised ER</p> <p>12) SEA Statement completed.</p>
2	Coillte	<p>As a stakeholder in the preparation of the Plan, Coillte welcomes the opportunity to make this submission to Tipperary County Council, in response to the publication of the draft Lough Derg Visitor Experience Development Plan 2020 – 2024, published on 28th August 2020.</p> <p>Coillte welcomes the publication of this draft Plan, which sets out a collaborative cross agency approach, to guide visitor experience and investment opportunities of the natural assets in the Lough Derg region, in the context of Ireland’s Hidden Heartlands tourism strategy and the Tourism Masterplan for the Shannon Region 2020-2030, prepared by Waterways Ireland.</p> <p>Coillte has a strong tradition of working with communities and stakeholders and is committed to continuing to work closely with the Councils, supporting the development of Portumna as a Destination Hub to “Uncover Irish history through a connected network of woodland, water and mountain trails, extending from Portumna’s historic core to nearby villages and monastic settlements.” (Visitor Experience Objective 3.3).</p> <p>Coillte supports the sustainable tourism model utilised within the Plan, which identifies the target market to inform a “distinctive and high quality visitor experience”, whilst also seeking to ensure the delivery of sustainable employment growth, benefits to local communities, and the protection and enhancement of the environment of Lough Derg as the principal asset in the region. It is considered that a key part of this high quality visitor experience will be in outdoor</p>	<p>1. No change recommended as there is higher level support throughout the document for this project. Further support could be provided via Galway County Council for inclusion in the Tourism Strategy and/or Galway County Development plan.</p>

NO	RESPONDENT	Submission Summary:	Consideration
		<p>recreation and forest-based activities, which drives economic activity while supporting job creation and sustaining local communities.</p> <p>Coillte supports the identification of Portumna as a Destination Hub for Lough Derg in the Plan, given its strategic location and range of natural and built assets, making it an ideal base for water based activities, navigating the Shannon, and for exploring the range of walking trails extending from the town, including the Beara Breifne Way.</p> <p>Portumna Forest Park is identified in the Plan “as a strategically important lakeshore forest for tourism”. A key opportunity identified is to provide improved pedestrian and cyclist links in Portumna, particularly linking Portumna Castle, the main street and Portumna Forest Park. Coillte will continue to work collaboratively with the Councils in improving these linkages as appropriate, within the Coillte estate, supporting the development of Portumna Forest Park “as an amenity with significant growth potential” as set out in the Northern and Western Regional Assembly Regional Spatial and Economic Strategy 2020-2032.</p> <p>A further key opportunity and objective identified in the Plan is to provide holiday accommodation in Portumna seeking to “Enable a Choice of Accommodation” and to “support the development of a variety of unique accommodation options to meet visitor needs” (Area Action Objective 2.2), identifying that,</p> <p>“Opportunities exist to provide more by way of alternative accommodation, offering visitors active days and cozy evenings. Activity friendly accommodation will be important for destination development including rentals that include bikes or boats. The feasibility of low impact accommodation options in some lakeside forests close to settlements can be explored.”</p> <p>Coillte welcomes this opportunity to explore the provision of forest based holiday accommodation at appropriate locations, including within Portumna Forest Park, with the local authorities. It is considered that the provision of low impact holiday accommodation within Portumna Forest Park could provide essential “visitor services and activity friendly accommodation”, complementing the range of assets in the town and supporting the Vision for Portumna as a Destination Hub at the centre of the “connected cluster of experiences” within this part of Lough Derg.</p>	
3	Woodford	This submission proposed a Woodford Village, South East Galway Corridor for the Greenway	1. No change recommended as there is higher level

NO	RESPONDENT	Submission Summary:	Consideration
	Parish Development	<p>A Greenway offers so much to the patron, whether local; national; or international visitors when considering the quality and quantity of amenities and beautiful vistas the route offers. Woodford can offer an excellent route choice with stunning outdoor family friendly experiences where exploration, adventure and exercise combine.</p> <p>The Route</p> <p>Part 1: Following the Shannon banks from Shannonbridge or Ballinasloe to Portumna through the lands retained by the ESB on either side of the river and along the Hymany way.</p> <p>Part 2: The suggested route from travels towards the Special areas of conservation, the bogs of Cloonmoylan and Barroughter on the western shores of Lough Derg – the Shannonside way.</p> <p>Part 3: From here we propose travelling from Looscaun Church through the Millennium forest at Derrygill towards the village of Woodford, and on to Moyglass</p> <p>Part 4: Moyglass to Kylebrack. This is the only part of the route thus far where private land may be required to continue the Greenway. We have identified the small number of landowners involved and are willing to consult with them should this route be successful.</p> <p>Part 5: Kylebrack to Kilcreest. This route begins at Kylebrack through Coillte Forestry along routes already established which could be widens to accommodate a greenway.</p> <p>Part 6: We are currently in consultation with the community groups in Kilchreest to develop the greenway further and will revise this document when we have a route established. From here it is possible to link to Kilbeacanty and onto Gort, perhaps to Kinvara and on to Ballindereen (on a cycleway alongside the main road which is already planned).</p>	<p>support throughout the document for this project. Further support could be provided via Galway County Council for inclusion in the Tourism Strategy and/or Galway County Development plan.</p>

2.0 How environmental considerations have been integrated into the Plan

2.1 Alternatives and the Plan

One of the critical roles of the SEA is to facilitate an evaluation of the likely environmental consequences of a range of alternative scenarios for the future development of the plan area. In preparing this Draft Lough Derg VEDP, the following three alternatives were considered, each focusing on a different spatial approach to the development of visitor experiences and associated tourism services and infrastructure:

- Alternative 1: Consolidation and Improvement to existing Tourism Infrastructure and Visitor Experiences and to provide new attractions in existing settlements;
- Alternative 2: Develop major new visitor attractions on or alongside the water/river; or
- Alternative 3: Do nothing.

2.2 Evaluation of Alternative Scenarios

This section evaluates the Alternative Scenarios VEDP Scenarios.

2.2.1 Alternative 1

Consolidation and Improvement to existing Tourism Infrastructure, Visitor Attractions and Experiences and to provide new attractions in existing settlements

Traditionally Lough Derg been a popular destination for both overseas and domestic visitors and the height of its popularity coincided with popularity in angling and emergence of the all island boat hire industry which acted as the cornerstone of Ireland's tourism product in the 1990. The area and the popularity of this product in particular has since declined, leaving behind a variety of underused hotels, jetties, harbours and boats. A key issue of the VEDP is the need to address the fall off in visitor number and regenerate the visitor infrastructure, services and towns that depend on the tourism industry as a basis for their economy.

Environmental impacts

The central environmental benefit of this alternative is associated with its focus on the re use and regeneration of existing tourism facilities and infrastructure and the regeneration of town centres. Whilst in some cases increased visitor numbers will mean that upgrades to existing infrastructure maybe required it is generally considered that the environmental impacts on air, water will be captured using these specific infrastructure upgrades and therefore minimised in this scenario. Indeed, the socio-economic benefits are likely to be greatest under alternative 1 as the economic benefits will accrue in areas where the existing population is highest.

2.2.2 Alternative 2

Develop major new visitor attractions on or alongside the water/river.

Lough Derg is located within a predominantly rural area which means that visitor infrastructure in terms of attractions, accommodation and associated activity is also low. Generally, speaking, the study area lacks any attractions of scale. The development of new attractions of scale will be required to invigorate the visitor offer and experience. Several locations for new attractions were identified and considered during the preparation of the VEDP however these would require the development of green field sites.

Environmental impacts

The environmental impacts associated with developing wholly new visitor attractions within the VEDP area are dependent on the nature, scale and location of the development and are potentially wide ranging.

2.2.3 Alternative 3:

Do nothing

The do nothing scenario was considered prior to the commissioning of the VEDP. With the emergence of Ireland's Hidden Heartlands brand, a requirement for a planned and coordinated approach was established. Without a VEDP in place, a number of potential disbenefits and environmental impacts would accrue.

Environmental impacts

The do nothing and business as usual approach was not considered appropriate on the basis that it would result in poor value for money in terms of any future investment as well as a potentially greater scale of environmental impacts associated with significant levels of unplanned and uncoordinated development. Without a plan led approach, the opportunity to test and consult on the strategy in accordance with the requirements of the Strategic Environmental Assessment Directive would also be missed.

2.2.4 Selection of Preferred Alternative

The preferred alternative which emerged from the evaluation process is **Alternative 1** which is the consolidation of and improvement to existing tourism infrastructure, visitor attractions and experiences and the provision of new attractions in existing settlements within the VEDP area. This has the fewest potentially negative impacts on the SEA objectives set out in Section 6.

This scenario contributes towards the protection of the environment and conforms to high level planning objectives around the prioritisation of development around existing infrastructure and settlements.

By applying appropriate mitigation measures - including those which already have been integrated into the VEDP - potential adverse environmental effects which could arise as a result of implementing this scenario are likely to be avoided, reduced or offset.

2.3 Communication of Environmental Considerations and Integration into the VEDP

Mitigation measures have been recommended where potential negative impacts from development in the VEDP area on environmental topic areas have been identified. These mitigation measures have been proposed with the aim of preventing, reducing and offsetting any significant adverse effects on the environment as a result of implementing the plan.

In developing the mitigation measures set out below, it is acknowledged that the implementation of the VEDP shall be consistent with the policies and objectives set out within the statutory planning framework provided by the National Planning Framework, the Regional Economic and Spatial Strategy for the Southern Region and the relevant County Development Plans. This statutory planning context provides the framework under which any new proposals associated with the VEDP will be assessed. Implementation will also have to comply with the all relevant legislation, policies, plans and programmes, particularly with respect to the provisions of the EIA and Habitats Directive.

2.4 Mitigation Measures incorporated into the Draft VEDP

Mitigation involves avoiding and /or reducing significant negative effects of the Draft VEDP. Where an environmental assessment identifies significant adverse effects, consideration is given in the first instance to preventing such impacts i.e. avoidance. Where this is not possible, reducing the magnitude or extent, probability and/or severity of effects is proposed.

Strategic Environmental Assessment is an iterative process and should be fully integrated into each stage of VEDP preparation. This section outlines the general mitigation measures currently integrated into the Draft VEDP that will prevent, reduce, and offset as much as possible any significant adverse effects on the environment resulting from the implementation of the VEDP.

In addition to avoiding certain approaches such as dispersal of tourism development in greenfield locations, the following mitigation measures are currently incorporated into the draft Lough Derg VEDP:

- Under Chapter 02 Ambition, reference to the VICE Model of Sustainable Tourism. The VEDP states that ‘We will develop the Lough Derg Destination across four areas of Sustainable Tourism, using the VICE model’. With respect to Environment is also states that ‘Ensuring that the implementation of this Destination Lough Derg Strategy facilitates the protection and enhancement of the environment of Lough Derg and its environs as the fundamental asset that is the basis of tourism in the region, in association with other key stakeholders’.
- This Destination Management Organisation will include as its remit:
 - Managing the developing local visitor economy,
 - Protecting and enhancing the environmental resource on which tourism is based,
 - Local capacity building and working with Fáilte Ireland on rolling out of training and supports across the tourism industry, and
 - Supporting collaborative working between tourism businesses and clustering of experiences within each Destination hub – this would draw on the collective work already underway including the Heartlands Heritage Group, for example, in the northern lake region, the Tipperary Food Producers network, Chambers of Commerce and other groups around the lake.
- In Chapter 07 Measuring Success, the following key performance indicators are identified:
 - Increased visitor numbers using public transport for getting to and around Lough Derg region
 - Adoption of eco-environmental ethos by businesses and community groups
 - Green boating (including electrification of boats and supporting infrastructure, where feasible);
 - Biosecurity measures in place at key harbours/ marinas
 - Number of Local Link or public transport improvements introduced
 - Meeting water quality targets

2.5 Further Mitigation Measures included in the Adopted VEDP

It is recommended that further measures are included in the adopted VEDP to address the potential for environmental effects. It is recommended that the following measures are included in the plan prior to its adoption:

1. An overarching statement and commitment to compliance with existing environmental legislation. This statement will be included in Chapter 02 Ambition.
2. Inclusion of an Environmental Management Section at the end of Chapter 06, Experience Development.
3. Enhanced monitoring arrangements included in Chapter 07, Measuring Success

2.5.1 An overarching statement and commitment to compliance with existing environmental legislation

The VEDP should emphasise that subsequent tourism proposals must be consistent with the environmental commitments contained in the National Planning Framework and Regional Spatial and Economic Strategies as well as the County Development Plans and Local Area Plans of the relevant local authority.

Project proposals and other proposed plans, referred to in this VEDP will also need to consider the requirements of the relevant environmental legislation and associated EU Directives such as SEA, EIA, Birds, Habitats, Floods and Water Framework directives, as appropriate. Further information on environmental sensitivities in the plan area which will help inform the need for these assessments is available from the EPA's Environmental Sensitivity Mapping Webtool (www.enviromap.ie).

2.5.2 Additional Text relating to Environmental Management

The following additional text is proposed:

1. Interpretation text should be developed to reflect environmental sensitivities and specific issues around wildlife disturbance including noise, littering and contamination of habitats. In addition, appropriate wayfinding should be used to guide visitors towards designated routes to create awareness and appreciation of areas of significant environmental quality and/or architectural significance, whilst mitigating the disturbance, erosion, and damage of same.
2. When considering the synergies of the various plans, it is important that the VEDP aligns with conclusions and recommendations arising from related environmental assessments.
3. Event management plans should be prepared to manage the environmental impact of popular festivals, with an attendance of under 5,000 people. This can be facilitated through the assistance and support of Destination Lough Derg and input from relevant statutory authorities such as the NPWS in relation to 'Notifiable Actions'.
4. Ensure that appropriate biosecurity measures are implemented in relation to the Lough Derg Blueway,
5. In relation to discovery points, further consideration should be given to potential impact on heritage assets, sustainable transport and access, water quality and designated sites.
6. In relation to measuring progress, environmental indicators should be developed in order to monitor visitor trends and related environmental impact. Draft monitoring measures are proposed in Section 9.4 and will be finalised on adoption of the VEDP.
7. Advice of the local planning authority should be sought in relation to developments or renovations that facilitate the 'scattered accommodation concept'.
8. Wastewater, surface water drainage and drinking water infrastructure must also be in place prior to development.
9. Support ongoing efforts to comply with COVID 19 guidelines for tourism operators and facilitate achievement of the relevant Q Mark standard where appropriate. Anticipate the future design implications relating to capital projects which may arise from the presence of COVID 19 in the longer term.
10. Seek to ensure that mayor new development incorporates a zero carbon approach
11. Ensure that mayor new development incorporates appropriate traffic management measures and measures to enhance sustainable travel.

2.6 Mitigation by SEA Topic

In the assessment of key environmental considerations, the VEDP was assessed as a single unit, with the opportunities and challenges highlighted within each SEA topic area. A discussion of the key conclusions follows. Table 17, following, provides a full summary of key environmental considerations for the VEDP.

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
Population and Human Health	<p>Opportunities</p> <ul style="list-style-type: none"> Improving recreational infrastructure along Lough Derg; Ensuring tourism potential is linked to economic opportunities in nearby settlements; Improved health and well-being by encouraging physical activity; Better integration of visitor services with existing infrastructure; Strengthening of communities; Inclusion of sustainable transport; and Promotion of natural asset-based economic growth. <p>Challenges</p> <ul style="list-style-type: none"> Increased infrastructural requirements for water and wastewater treatment to service visitor growth; Increase in demand for transport services and associated infrastructure i.e. car parking; Potential risks associated with COVID 19; and 	<ul style="list-style-type: none"> Deterioration of water quality Increase in air emissions. Increase in development that creates unsustainable transport patterns. 	<p>Provide adequate facilities to manage wastewater</p> <p>Support ongoing efforts to comply with COVID 19 guidelines for tourism operators and facilitate achievement of the relevant Q Mark standard where appropriate. Anticipate the future design implications relating to capital projects which may arise from the presence of COVID 19 in the longer term.</p>

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
	<ul style="list-style-type: none"> Increasing car dependency and associated emissions to air with associated health impacts. 		
Biodiversity	<p>Opportunities</p> <ul style="list-style-type: none"> More coherent protection and enhancement of biodiversity on a regional scale; and Consideration of the economic potential of biodiversity, flora and fauna to contribute to economic wellbeing of communities. <p>Challenges</p> <ul style="list-style-type: none"> Potential for interactions with population and human health e.g. access to outdoors and disturbance to wildlife; Balancing tourism growth with protecting wild places and protected areas; Realising amenity-based tourism without causing recreational pressures on sites of biodiversity importance; Potential for effects on protected areas; Potential for habitat loss and fragmentation; Potential introduction / spread of alien species and invasive species; Potential for disturbance of wildlife particularly birds listed as features of SPA sites; 		<p>Biosecurity measures for inland waterways, prepared by organisations such as Waterways Ireland to prevent the inadvertent disruption of the Lough Derg and the Shannon’s natural ecosystems, would be implemented across the VEDP area.</p> <p>The mitigation measures for the effects of the VEDP are set out in detail in the Natura Impact Report but can be broadly summarised as follows:</p> <ul style="list-style-type: none"> Wastewater, surface water drainage and drinking water infrastructure must be in place prior to development. Contractors appointed to undertake any construction works will be expected to provide site specific method statements detailing measures taken to protect the environment during all phases of works. Measures to protect the environment will be incorporated into design of projects to avoid adverse effects on

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
	<ul style="list-style-type: none"> • Deterioration in water quality • Deposition of pollutants on vegetation and to water. 		<p>the integrity of Natura 2000 sites. These will include, but will not be limited to, measures such as those set out in:</p> <ul style="list-style-type: none"> ▪ Guidelines on Protection of Fisheries During Construction Works In and Adjacent to Waters (IFI, 2016) and ▪ Environmental Good Practice on Site Guide (CIRIA, 2015) <ul style="list-style-type: none"> • Irrespective of planning requirements ecological assessment should be carried out for all projects or other means of implementing the objectives of the Visitor Plan. • The design of linkages, paths and cycleways must be prepared with the sensitivities of Natura 2000 sites and the broader ecological environment in mind. Any such proposal must

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
			<p>consider the potential for increased disturbance of species, such as otter and breeding, roosting or foraging birds, due to any increase of human activities. Locating and designing paths and cycleways should be carried out with input from ecologists and planners to ensure there is no risk of adverse effect on Natura 2000 sites.</p> <ul style="list-style-type: none"> • Lighting of buildings and features around Lough Derg and along watercourses will be avoided wherever possible. If lighting is required within the riparian zone or along the banks of a watercourse it should be designed in consultation with an appropriately qualified ecologist. • It must also be noted that the appropriate assessment at plan level does not exempt projects or plans arising from the plan from the

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
			<p>assessment requirements of Article 6(3) at a later stage, when much more details of potential impacts and effects are known. In other words, projects or plans that result from the Visitor Plan are also required to undergo Article 6 assessment before they can proceed or be permitted. The relevant competent authority, such as Tipperary County Council, An Bord Pleanála or other designated public authority, will be responsible for ensuring that projects or plans that result from the Visitor Plan are also required to undergo Article 6 assessment before they can be permitted or proceed.</p>
Soil	<p>Opportunities</p> <ul style="list-style-type: none"> • Encourage sustainable soil management; • Protect soils including prime agricultural land; • Protect soils with high carbon content e.g. peatlands; 	<ul style="list-style-type: none"> • Introduction / spread of invasive aquatic and terrestrial species • Soil erosion/compact ion 	<ul style="list-style-type: none"> • Implement and enforce good biosecurity measures. • Siting of new infrastructure and facilities in town centre locations, focusing on the reuse of existing buildings and the redevelopment of brownfield land to minimise the impact on soil.

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
	<ul style="list-style-type: none"> • Protect lands with ecosystem services e.g. peatlands, wetlands, hedgerows, grasslands; • Utilisation of existing brownfield sites; and • Support the long-term strategy for the transition from peat extraction towards a natural asset-based rural economy. <p>Challenges</p> <ul style="list-style-type: none"> • Identify appropriate locations for tourism development i.e. in existing settlements or brownfield sites. • Avoid the loss of prime agricultural land for development • Erosion of soils; • Soil compaction; • Spread of invasive species; • Soil pollution; • Effects on geomorphology (i.e. landforms and river channels); and • Sealing of soils; and • Increase in extent of built up areas/urbanisation/impermeable surfaces. 		
Water	<p>Opportunities</p> <ul style="list-style-type: none"> • Improve water quality by influencing the location and type of development within all catchments, but particularly those with water quality issues; • Improve water quality by identifying and 	<p>Potential adverse effects of new development on the capacity of existing waste water treatment facilities</p>	<ul style="list-style-type: none"> • Ensure adequate drinking water and wastewater treatment is available to accommodate planned growth and development;

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
	<p>addressing impacts on the water environment; and</p> <ul style="list-style-type: none"> • Improve water infrastructure networks and ensure development is matched with current and future infrastructure capacity. • Ensuring new development does not increase current risk; • Reduce flooding by ensuring new development is not located in areas of high flood risk; • Potential to further develop permeable lands and sustainable drainage systems in urban areas; and • Support the fishing industry and encourage other value-added activities. <p>Challenges</p> <ul style="list-style-type: none"> • Facilitating growth and development without compromising achievement of WFD objectives; • Ensure adequate drinking water and wastewater treatment is available to accommodate planned growth and development; • Protect water dependant ecosystems from pollution; • Prevent the introduction and/ or 		

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
	<p>spread of invasive species;</p> <ul style="list-style-type: none"> • Morphological impacts on water bodies from additional boating infrastructure; • Preparing for and taking account of coastal hazards such as erosion and impacts from climate change such as sea level rises, increased flooding events and extreme weather events; and • Impacts on water bodies from construction of new wastewater treatment facilities and infrastructure. 		
Air Quality	<p>Opportunities</p> <ul style="list-style-type: none"> • Reduce transport related emissions and increase energy efficiency across all transport modes; and • Encourage modal shift amongst visitors. <p>Challenges</p> <ul style="list-style-type: none"> • Visitors are largely car dependant; • Increase in emissions to air due to increase in boat activity and traffic to the site; • Increasing NOx and particulate matter (PM10 and PM2.5) emissions as a result of road transport and increased transport on water; • Modal shift away from road transport; and 	<ul style="list-style-type: none"> • Increase in emissions to air stemming from 	<ul style="list-style-type: none"> • Encourage and support walking, cycling and public transport to reduce emissions to air • Focus infrastructure and amenity areas outside high value biodiversity zones. • Encourage new and refurbished electric powered boats. • Ensure that mayor new development incorporates appropriate traffic management measures and measures to enhance sustainable travel.

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
	<ul style="list-style-type: none"> Reduce transport demand. 		
Climate Change	<p>Opportunities</p> <ul style="list-style-type: none"> Integrate pathways to carbon neutrality across development plan proposals; Increase efficiency and reduce energy demand in new build; Consider opportunities for renewable energy in new build; Encourage modal shift; and Reduce transport related emissions. <p>Challenges</p> <ul style="list-style-type: none"> Car dependency within the visitor economy; Climate adaptation and mitigation; Increased risk of extreme weather events; and Flood risk. 	<ul style="list-style-type: none"> Increased energy demand, particularly from carbon intensive development and car based travel. 	<ul style="list-style-type: none"> Seek to ensure that mayor new development incorporates a zero carbon approach Encourage new and refurbished boats that are electric powered In areas of potential flood risk, a flood risk assessment will be necessary. Vulnerable uses may not be appropriate in areas of high risk. Site specific flood risk assessments will identify the constraints for consideration at the detailed design stage. Further consideration of the potential impact of climate change on all potential sources of flooding will also be provided.
Cultural Heritage	<p>Opportunities</p> <ul style="list-style-type: none"> Support national level policies at regional level to protect and enhance the region's varied archaeological and architectural heritage assets; Integration of cultural heritage into the design of future developments; Promotion of the cultural heritage resource as a source of economic benefit for communities e.g. tourism; 	<p>Developments that do not consider the role, value and opportunity provided by cultural heritage.</p>	<p>Where development involves a protected structure or national monument professional design input and conservation expertise will be required to avoid impacts on the historic fabric of the building.</p>

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
	<ul style="list-style-type: none"> • Promotion of Lough Derg’s unique cultural wealth and assets; and • Cultural contribution to wider social and economic goals e.g. a heritage based approach to renewal and tourism. <p>Challenges</p> <ul style="list-style-type: none"> • To preserve and protect the cultural heritage including architecture, archaeology and cultural heritage; • Impacts on archaeological features and setting; and • Impacts for underwater archaeological features during construction of new infrastructure and/or upgrades. 		
Material Assets	<p>Opportunities</p> <ul style="list-style-type: none"> • Plan to be aligned with required transport, water, energy infrastructure; • Balance competing requirements for land use and natural resources; and • Investment in supporting infrastructure e.g. water infrastructure. <p>Challenges</p> <ul style="list-style-type: none"> • Scale or pace of development not in keeping with level of service provision/adequate capacity e.g. serviced land, water supply and drainage, 	Inadequate infrastructure to facilitate new development	<ul style="list-style-type: none"> • Ensure the proposal meets defined local/market need and avoids displacement of existing facilities. • Encourage event management plans for festivals under 5,000 people

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
	<p>road/ port/ airport capacity;</p> <ul style="list-style-type: none"> • Provision of infrastructure which is adaptable to the impacts of climate change; • Increased in waste generated; and • Increased demands on water supply. 		
Landscape	<p>Opportunities</p> <ul style="list-style-type: none"> • Support policies to protect landscapes; • To integrate landscape considerations into the design of future developments; • To develop requirements for design statements for villages, towns, and key service centres around Lough Derg; and • Develop a coordinated approach to identify scenic routes and associated key attractions coupled with infrastructure provision for the creation of safe, segregated pathways. <p>Challenges</p> <ul style="list-style-type: none"> • Impacts on landscape character; • No national landscape character assessment; and • The lack of coherent landscape designations and LCAs will provide a challenge in the preparation of the Environmental Report 	<ul style="list-style-type: none"> • Poor site selection in relation to new projects • Inappropriate site design, height and massing of new development • Varying approach to design policy 	<ul style="list-style-type: none"> • Siting of new infrastructure and facilities in town centre locations, focusing on the reuse of existing buildings and the redevelopment of brownfield land to minimise the impact on soil.

SEA Topic Areas	Opportunities / challenges	Significant Environmental Effects	Proposed Mitigation
	and SEA assessment, but potential impacts on all existing such designations should be considered.		

3.0 Monitoring Measures

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. Article 17 of SI No. 435/2004 - European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, states that

‘the competent authority shall monitor the significant environmental effects of implementation of the plan or programme, or modification to a plan or programme in order, inter alia, to identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action and, for this purpose, existing monitoring arrangements may be used, if appropriate, with a view to avoiding duplication of monitoring.’

This section outlines the measures for monitoring the likely significant effects of implementing the Plan. Table 5 overleaf shows the indicators which have been selected for monitoring the likely significant environmental effects of implementing the Plan, if unmitigated. Monitoring of individual indicators will be controlled by the frequency of reporting from other sources. The Monitoring Programme may also be updated to deal with specific environmental issues - including unforeseen effects - as they arise. Such issues may be identified by the Competent Authority or identified to the Competent Authority by other agencies over the course of the VEDP implementation period

Table 4 Proposed Monitoring Framework for the Lough Derg VEDP

Ref	Environmental Objective	Indicator	Topic	International, National policy documents / strategies / guidelines	European, Source of Information
1 BIO	Conserve and enhance habitats and species, with priority protection afforded to sites and species designated under the Habitats Directive	<ol style="list-style-type: none"> 1. Loss of habitats and species 2. Quality and range of statutorily protected areas along the Shannon 	Biodiversity	<p>EU Habitats Directive (92/43/EEC) EU Birds Directive (79/409/EEC) UN Convention on Biological Diversity Actions for Biodiversity 2011- 2016, Ireland’s National Biodiversity Plan (2011) National Wildlife Act 1976-2000</p>	<ol style="list-style-type: none"> 1. 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) 2. Department of Culture, Heritage and the Gaeltacht’s National Monitoring Report for the Birds Directive under Article 12 (every 3 years) / Consultations with the NPWS / CORINE mapping resurvey (every c. 5 years)
2 BIO	Prevent the spread of invasive species	<ol style="list-style-type: none"> 1. Occurrence of invasive species 	Biodiversity	<p>EU Habitats Directive (92/43/EEC) EU Birds Directive (79/409/EEC) UN Convention on Biological Diversity Actions for Biodiversity 2011- 2016, Ireland’s National Biodiversity Plan (2011) National Wildlife Act 1976-2000</p>	<ol style="list-style-type: none"> 2. National Biodiversity Data Centre Examine records of http://invasives.biodiversityireland.ie / Heritage/biodiversity officers of local authorities
3 HEA	Improve health and wellbeing by	<ol style="list-style-type: none"> 1. Numbers participating in walking and cycling 		Ireland 2040 – The National Planning Framework (2018)	<ol style="list-style-type: none"> 1. Waterways Ireland 2. Area Engineers at Local authorities

	improving opportunities safe and sustainable transport	<p>activities – based on data from existing Waterways Ireland Counters</p> <p>2. Issues with traffic flows/congestion during peak visitor periods</p> <p>3. Air Quality</p>	Population and Human Health	<p>People, Place and Policy Growing Tourism to 2025 Directive 2002/49/EC of 25 June 2002 relating to the assessment and management of environmental noise Directive 96/62/EC – Air Quality Framework Directive Ambient Air Quality and Cleaner Air for Europe (CAFE) Directive (2008/50/EC)</p>	3. EPA, air quality monitoring stations
4 WAT	Protect and improve the quality of surface and ground water bodies	WFD water status of surface and groundwaters	Water	<p>European Communities (Natural Habitats) Regulations, 1997 (S.I. No. 94 of 1997 as amended by S.I. No. 233 of 1998 and S.I. 378 of 2005);</p> <p>European Communities Environmental Objectives (Surface Water) Regulations, 2009 (S.I. No. 272 of 2009);</p> <p>European Communities Environmental Objectives (Groundwater) Regulations, 2010 (S.I. No. 9 of 2010), and;</p> <p>European Communities (Good Agricultural Practice for Protection of Waters) Regulations, 2010 (S.I. No. 610 of 2010).</p> <p>EU Water Framework Directive (2000/0/EC)</p>	Environmental Protection Agency

				<p>Bathing Water Quality Regulations (SI No. 79 of 2008)</p> <p>European Communities Environmental Objectives (Surface Waters) Regulations 2009 (SI No. 272 of 2009)</p>	
5 WAT	Protect water levels	WFD water status of surface and groundwaters	Water	<p>European Communities (Natural Habitats) Regulations, 1997 (S.I. No. 94 of 1997 as amended by S.I. No. 233 of 1998 and S.I. 378 of 2005);</p> <p>European Communities Environmental Objectives (Surface Water) Regulations, 2009 (S.I. No. 272 of 2009);</p> <p>European Communities Environmental Objectives (Groundwater) Regulations, 2010 (S.I. No. 9 of 2010), and;</p> <p>European Communities (Good Agricultural Practice for Protection of Waters) Regulations, 2010 (S.I. No. 610 of 2010).</p> <p>EU Water Framework Directive (2000/0/EC)</p> <p>Bathing Water Quality Regulations (SI No. 79 of 2008)</p> <p>European Communities Environmental Objectives</p>	Environmental Protection Agency

				(Surface Waters) Regulations 2009 (SI No. 272 of 2009)	
6 WAT	Minimise development in areas of flood risk, where flood risk compatible development is proposed ensure that flood risk does not increase elsewhere.	Interaction with flood extents / significant planning application within areas of flood risk	Water, material assets	<p>European Communities (Natural Habitats) Regulations, 1997 (S.I. No. 94 of 1997 as amended by S.I. No. 233 of 1998 and S.I. 378 of 2005);</p> <p>European Communities Environmental Objectives (Surface Water) Regulations, 2009 (S.I. No. 272 of 2009);</p> <p>European Communities Environmental Objectives (Groundwater) Regulations, 2010 (S.I. No. 9 of 2010), and;</p> <p>European Communities (Good Agricultural Practice for Protection of Waters) Regulations, 2010 (S.I. No. 610 of 2010).</p> <p>EU Water Framework Directive (2000/60/EC)</p> <p>Bathing Water Quality Regulations (SI No. 79 of 2008)</p> <p>European Communities Environmental Objectives (Surface Waters) Regulations 2009 (SI No. 272 of 2009)</p> <p>EU Directive on the assessment and management of flood risks [2007/60/EC],</p>	Area engineers within local authorities / Assessments carried out at project level CFRAMS / floodmaps.ie

				The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) National Adaptation Framework, Planning for a Climate Resilient Ireland, 2018	
7 CLI	To adapt and mitigate the effects of climate change	<ol style="list-style-type: none"> No of new major zero carbon tourism developments in the VEDP area Electrification of boats and supporting infrastructure / Number of electric vehicles introduced and level of investment in supporting infrastructure (indicator to be confirmed) 	Climate	<p>EU Directive on the assessment and management of flood risks [2007/60/EC], The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) National Adaptation Framework, Planning for a Climate Resilient Ireland, 2018 A 2030 Framework for Climate and Energy Policies [COM (2013) 169] EU 2020 Climate and Energy Package 2013-2020 National Planning Framework 2040 National Mitigation Plan 2017 Climate Act 2015</p>	<ol style="list-style-type: none"> Local authority development management teams Waterways Ireland
8 HER	To protect the integrity and authenticity of cultural heritage	Number of unused historic properties redeveloped or brought back into use	Cultural heritage	<p>National Monuments Act, 2004 Planning and Development Act, 2000 S.I. 229/2005 - National Monuments Act 1930</p>	<ol style="list-style-type: none"> Information on funding under the Structures at Risk Scheme is available from the Department of Culture, Heritage and the Gaeltacht / Local authority development management

				(Section 14B) Regulations 2005 Government Policy on Architecture 2009 – 2015	teams / information from local authorities on number of planning applications referred to the DAHG 2. Lower tier environmental assessment and decision making by local authorities
9 LAN	To protect landscape character, minimise the loss of historic landscape features such as mature trees and hedgerows and scenic views	Number of developments subject to Landscape and Visual impact assessment	Landscape	The European Convention on Landscape, 2000 A National Landscape Strategy for Ireland Strategy Issues paper for consultation (2011)	1. Information from planning departments of local authorities 2. Lower tier environmental assessment and decision making by local authorities
10 SOIL	To protect soil resources and minimise the loss of the high quality agricultural land	Area of cut away bog remediated	Soil, Geology	A Resource Opportunity, Waste Management Policy in Ireland. Department of the Environment, Community and Local Government July 2012	- Bord na Mona / Corine land cover data

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