

## **Independent Review of Aquaculture Licensing**

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**P85 TX47**

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A Chara,

Further to the advertisement seeking submissions in relation to the **review of the aquaculture licencing process** from pre-application stage to the determination of a licence, please find below a submission on behalf of Fáilte Ireland. It sets out strategic considerations which we believe should be reflected in the review of the process and associated legal framework, to protect and support the growing tourism sector and which would complement Fáilte Ireland's work with relevant stakeholders throughout the Country.

### **Tourism and the Economy**

Tourism is a significant component of the Irish Economy– as a revenue generator and economic driver, and also because it makes a special contribution to the Ireland's sense of place and unique character. Overseas visitors contributed some €4.6 billion to the national economy in 2015. Domestic tourism expenditure amounted to €1.7 billion, making tourism a €7.7 billion industry<sup>1</sup>. This total out-of-state and domestic tourism expenditure of €7.7 billion in 2015 represented 4.0% of GNP in revenue terms.

Over the last number of years, Fáilte Ireland has worked closely with Local Authorities and Government Departments throughout Ireland to promote the spatial management of tourism. This move away from the traditional objective-based approach has seen tourism increasingly thought of as a 'land-use' – one which must be considered and planned for in the context of a whole range of other uses all of which compete for resources, space and priority. Similarly,

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<sup>1</sup> Fáilte Ireland: Tourism Facts 2015

these principles must be applied to Marine based activities, in particular those which are intrinsically linked to onshore activities and uses.

Ireland has made a significant move towards integrated spatial planning for marine as well as land resources in recent years. The publication of *Harnessing Our Ocean Wealth* in 2012, established Ireland's first commitment to integrated marine planning. This document set out a roadmap for the Government's vision, high-level goals and integrated actions across policy, governance and business to enable Ireland's marine potential to be realised. Similar to the Integrated Maritime Policy for the EU, Ireland has put in place a range of integrated actions across all relevant policy areas related to the seas; including transport, environment, offshore renewable energy, enterprise, employment, research, seafood and external relations.

Fáilte Ireland recognises the value of Ireland's aquaculture industry, both nationally and globally. Agriculture, fisheries and aquaculture are central to providing opportunities to increase food security for a growing world population estimated to reach nine billion by 2050 and to meeting the challenge of alleviating poverty and addressing hunger especially prevalent in many developing countries of the world. Foods derived from aquatic resources have a significant role to play across the food supply and value chain, linking ecosystems, economic development and human well-being.

Planning for tourism critically requires an understanding of the local market and then an appreciation of the physical needs of the sector to meet those market needs, while balancing these in the wider context of sustainable planning and development. Aquaculture licencing and the associated legal framework must consider tourism as thoroughly as it would other Marine environmental topics. While the Authority is supportive of the development of the aquaculture industry and is supportive of the significant economic benefits associated with its development, the environmental and other impacts (including those on tourism) must be considered, particularly in relation to the impacts of developments and their cumulative impact in relation to the carrying capacity of bays.

The development of initiatives such as the *Wild Atlantic Way* has recaptured the attraction of Ireland's Atlantic coast for visitors and reinforced the need to protect this valuable environmental and tourism resource (*Appendix A*). Fáilte Ireland itself is committed to protecting Ireland's Atlantic coast and carries out its own environmental monitoring programme along the route of the Wild Atlantic Way.

### **Aquaculture in Ireland**

Aquaculture by its very nature takes place primarily in coastal areas but also occurs inland in freshwater and in land-based recirculation systems. Similar to tourism, it is recognised that the sector provides a vital source of employment and economic activity and contributes to the

reservation of viable rural communities. The Government's *Harnessing Our Ocean Wealth* plan proposes increasing aquaculture volume production by 78% by 2020. An increase of this magnitude, will undoubtedly give rise to a number of potential impacts, both positive and negative.

Areas of Ireland that have the highest concentrations of aquaculture include Co. Donegal, West Cork, Co. Kerry, Co. Galway, Co. Mayo, Carlingford Lough, Co. Wexford, and Co. Waterford. Significantly for Fáilte Ireland, these counties (particularly the Atlantic west coast counties) are some of the most popular locations within Ireland for the tourism industry and many are located along *Wild Atlantic Way*.

Shellfish farming, in particular the Pacific Oyster, has become a substantial element of the Irish aquaculture industry with a lucrative export trade. Oyster farm sites are primarily located along Ireland's Atlantic coast and in some cases, there are particular locations where large areas of the foreshore are given over to this activity. The sites chosen for the Pacific oyster farms are typically in sheltered bays around the coast and are located in the inter-tidal zone between the mean high water spring mark and the mean low water spring mark. As oyster stocks are reared in plastic mesh bags secured to steel trestles, these farms are visible from the land in many instances, particularly at low tide.

### **Aquaculture and Tourism – Opportunities and Constraints**

Aquaculture presents significant opportunities for marine tourism. There is opportunity to improve public knowledge of the industry and for farmers to become involved in developing creative ways of diversifying and supplementing their farm income. The coastal nature of aquaculture also complements the tourism products promoted through the Wild Atlantic Way strategy.

The synergies between aquaculture and tourism are also evident in the success of numerous seafood festivals throughout the country. The Galway International Oyster and Seafood Festival for example has been running for 63 years and one of the main attractions for visitors has been experiencing the Irish farmed oysters from numerous bays around the country. Other festivals include; the Connemara Mussel Festival; the Carlingford Oyster Festival and the Clarenbridge Oyster Festival.

Fáilte Ireland and BIM have further captured the synergy between aquaculture and tourism through *Taste the Atlantic – A Seafood Journey* where tourists can experience the Wild Atlantic Way through aquaculture producers from Erris, Co. Mayo to Galway Bay. Tourists can visit mussel and oyster farms and can also learn about the production of Irish organic salmon and experience the smoking of this much sought after product.

While there are undoubtedly many opportunities presented by the development of aquaculture, the sustainable development of aquaculture must be in keeping with other development objectives for the area. In essence, any aquaculture development must ensure that local habitats, flora, fauna and avifauna are not adversely impacted.

The marine environment is a fragile ecosystem where irreversible changes can occur if practices employed are not environmentally sensitive. Negative impacts through the accumulation of waste under fish farm cages, changes in benthic communities, alteration of nutrient balance within the system, reduction in gene pool strength due to escaping aquaculture stock mating with wild populations and transmission of diseases to wild stocks can occur in areas where there is a large amount of aquaculture. In bays where there are too many aquaculture projects operating, it is likely that there will be detrimental effects on the yields of the different aquaculture businesses, the marine environment and important recreational industries such as angling and ecotourism.

### **Guiding Principles for the Sustainable Development of Tourism**

Fáilte Ireland is committed to the sustainable development of tourism while ensuring that the necessary measures are taken to achieve and maintain good environmental status in the marine environment. The Authority has developed five principles of sustainable tourism designed to encapsulate the need to achieve a balance between appropriate tourism development and economic, environmental and social sustainability. These principles were written with onshore development in mind, but can equally be applied to developments in the marine environment. The five principles are included as *Appendix B* to this submission.

### **Tourism and the Environment**

There are two interactions between tourism and the environment - impacts *caused by* tourism projects and impacts *affecting* tourism. With regard to aquaculture developments it is anticipated that the majority of the interactions would occur as impacts affecting tourism. Considering the significance of tourism to the Irish economy, it is recommended that guidance is provided to facilitate the systematic evaluation, in any accompanying EIS, of effects of aquaculture on tourism as a specialist subsection of the topic 'Population and Human Health'.

Fáilte Ireland previously published *Guidelines on the treatment of tourism in an Environmental Impact Statement, 2011* (attached *Appendix C*). These guidelines were written with a focus on onshore developments. The principles may however, be applied to developments offshore or on the foreshore in the marine environment.

Assessments in the Marine environment can require specialised expertise for EIA. Many of the issues relating to tourism can be assessed under seascape and visual impact. The seascape can be defined as *'the visual and physical conjunction of land and sea which combines maritime, coastal and hinterland character'*. Seascape and landscape visual impact assessment primarily consists of an assessment of the effects upon; the character of the seascape and landscape and its sensitivity (maritime, coastal, edge, intertidal zones and hinterland); and particular views and visual amenities (from both land and sea). Interactions with other environmental considerations (e.g. tourism and marine leisure) need to be an integral part of the assessment and the in-combination and cumulative effects of developments need to be assessed.

Fáilte Ireland carries out regular visitor attitude surveys. Fáilte Ireland's Port Survey of Overseas Holiday makers 2015, identifies the following, in order of priority, as the reasons tourists visit and enjoy Ireland:

- Friendly, hospitable people (96%)
- **Beautiful scenery (92%)**
- Safe and secure destination (92%)
- **Good range of natural attractions (87%)**
- Interesting history and culture (86%)
- **Natural unspoilt environment (86%)**
- Attractive cities and towns (83%)
- Easy, relaxed pace of life (75%)
- Suitable for touring (74%)

It is noteworthy that beautiful scenery, natural attractions and natural unspoilt environment all score highly as reasons for visiting Ireland. These factors are environmental and relate particularly to the areas where potential aquaculture developments may take place. The following describes how these factors should be considered within an EIS and how they interact with tourism.

- Beautiful scenery – This is generally covered in the *'Seascape and Landscape'* Section. Particular attention needs to be paid to effects on views from existing purpose built tourism facilities, as well as views from touring routes and walking trails. Initiatives such as the Wild Atlantic Way have the potential to be particularly affected by aquaculture developments which are located within viewing distance from the coast. These attitudes are dependent upon the scale and sighting of individual and cumulative developments however.
- Natural attractions – This is principally covered in the *'Biodiversity, Flora and Fauna'* Section and to a lesser extent *'Seascape and Landscape'*, *'Water'* and *'Cultural and Archaeological Heritage'* Sections. It is important to avoid any effects that may reduce

the health or extent of the marine habitats. This can occur either directly, by impinging on the site, or indirectly, the accumulation of waste, alteration of the nutrient balance within the system, transmission of disease to wild stocks, or alteration of the gene pool strengths on which the habitat depends.

- Natural Unspoilt Environment - This is covered in sections dealing with '*Seascape and Landscape*', '*Biodiversity, Flora and Fauna*' and '*Water*'. Tourism programmes, such as the Wild Atlantic Way, are based upon the visitor exploring the rugged, natural, unspoilt Atlantic coast of Ireland. It is important that any future developments do not have a negative impact on this natural environmental asset.
- It is imperative that an objective, legally robust and accurate assessment of the environment impacts associated with this industry is achieved through the licencing process.

It is also recommended that Fáilte Ireland's *Guidelines on the treatment* of tourism in an Environmental Impact Statement, 2011 are considered in this review of the licencing process.

### **Aquaculture Licencing Process and Associated Legal Framework:**

#### **Recommendations**

The Vision for 2020, set out in the *National Strategic Plan for Sustainable Aquaculture Development* aims to achieve "A sustainable and competitive aquaculture sector, where production will grow according to market and consumer demands and in balance with nature and society".

It is imperative that in an effort to increase production and to improve and expedite the licencing process, that the aquaculture industry minimises any potential damage to the environment and to other industries, such as tourism, which are directly and indirectly affected both positively and negatively, by its operation. There are a number of considerations which Fáilte Ireland recommend be taken on board in this review of the licencing process, which may assist in expediting the process, providing increased clarity for developers and decision makers, ensuring that decisions are legally robust and in compliance with the relevant national and EU legislation, ensuring a sustainable environmental approach and providing increased protection for the aquaculture and associated industries.

### 1. The Precautionary Principle

The precautionary principle is an approach to human activity that attempts to minimise potential damage to the environment. In the present context, the precautionary principle is particularly relevant with regard to the lack of scientific certainty, in some cases, regarding the individual and cumulative impacts of aquaculture. It is considered that precautionary principle should be applied to ensure that an aquaculture project is not permitted unless adverse impacts of the project, individually and in combination with other activities in the area, can be excluded. The onus should be on aquaculture developers to demonstrate beyond reasonable scientific doubt that there will not be such adverse impacts.

### 2. Cumulative Impacts

Ireland currently implements a disjointed 'project-by-project, permit-by-permit' approach to aquaculture development. It is recommended that Environmental Impact Assessments should be carried out to assess the in-combination effects of all aquaculture activities within each bay area, rather than assessing licences on an individual basis. It is important to note that while a single development may not, in itself cause a significant impact on the receiving environment, a combination of projects within a localised area may. Therefore, when assessing the possible effects of a project, the cumulative impacts of a number of aquaculture developments or licence applications must be taken into consideration.

Annex III of EIA Directive 2011/92/EU refers to the characteristics of projects that must be considered for an EIA. Paragraph 1(b) of Annex III refers to the cumulation with other projects, indicating that cumulative impacts of aquaculture operations are an important factor for EIA purposes. EIA's should take into account the potential impacts of the aquaculture facility over its entire lifecycle, including the construction, operation and decommissioning phases of the facility.

The cumulative impacts of the multiple environmental pressures within a bay should be assessed in conjunction – i.e. the cumulative impacts from one sector should not be viewed in isolation from other environmental impacts.

### 3. Carrying Capacity

Carrying capacity is a term used to describe the maximum average number of organisms that can be sustained so that they can survive and reproduce in the long term, without degrading the surrounding environment. It is necessary to ascertain the carrying capacity of the bay for which an aquaculture licence or licences are being sought. The extent of aquaculture should not exceed what an area can naturally sustain and assimilate to ensure no environmental degradation.

Management Plans for whole bay areas should be developed for bays supporting aquaculture in order to ensure that the level of aquaculture does not exceed the carrying capacity of the bay. Management plans should set out the need for rigorous and independently informed cumulative impact assessment as part of the EIA consent process for aquaculture, together with an independent and regular monitoring system.

#### 4. Aquaculture Siting

Aquaculture operations should be appropriately sited to ensure minimal impacts. Locations should be selected not only on the basis of growing conditions, availability and accessibility, but also on the basis of environmental impacts, visual impacts and economic impacts. The EIA process should act as a catalyst for better research into the suitability of locations for aquaculture activities within the marine environment. When carrying out an assessment of topic for the EIS, adequate scoping is essential. This is a key stage in identifying existing data sets, data gaps and the requirement for survey information.

The process should also ensure the collection of baseline information which will help in terms of measuring and assessing any changes over time.

In addition to potential environmental impacts, aquaculture operations, by their very nature and location have the potential to have significant impacts on the tourism environment. It is important that tourism is considered when identifying the potential receptors that may be affected by a particular aquaculture development.

It is recommended that more stringent enforcement procedures are also required in order to ensure the removal of structures and the rehabilitation of sites upon the cessation of aquaculture activities. This is important in order to ensure that environmental and visual impacts in particular are removed.

#### 5. Application Procedure

It appears to be difficult to access information on current applications, previous decisions, the location and cumulative impact of applications, etc. It is suggested that there is an apparent need for a map based, co-ordinated aquaculture management system, which makes it easier to view applications, identify sites where applications have been made and to see whether a particular licence application was granted or refused.

#### 6. EU Habitats and Birds Directives

In addition to the need to consider any potential effects of aquaculture on European Sites (i.e. SACs under the Habitats Directive and SPAs under the Birds Directive), the aquaculture licensing process and subsequent monitoring processes should take account of the continuing legal obligation to avoid, in such sites, the deterioration of habitat quality as well as effects such



as disturbance on species for which the areas have been designated. Effects should be considered alone and in-combination with other Plans and Projects that are likely to lead to significant effects on the conservation objectives of any European Site.

### **Concluding Remarks**

We trust that the above may provide the independent review group with some additional ideas that could be captured in the revised licencing procedure. Please do not hesitate to contact us if you have any further queries or questions.

We thank you for your time and consideration of our submission.

Is mise le meas,



**Mary Stack**

**Environment & Planning, Fáilte Ireland**

## **Appendix A– *Wild Atlantic Way***

### **Wild Atlantic Way**

The Wild Atlantic Way is the longest defined coastal touring route in the world stretching 2,500km from the Inishowen Peninsula in Donegal to Kinsale in West Cork. The geography of the Wild Atlantic Way encompasses the coastline and hinterland of the nine coastal counties of the West of Ireland. The immediate catchment of the Wild Atlantic Way is the area surrounding the spine of the route itself, the landmass to the west of the route as far as the coast (and the islands) and immediate landmass to the east of the route. The route itself is a magnet or calling card to gain the attention of the international visitor and acts as a device to

entice people to the West of Ireland. Once there, visitors are encouraged to further explore and engage with tourism experiences and communities in the wider geographical area.

The overall objective of the Wild Atlantic Way project is to grow the economic contribution of tourism to the nine coastal counties of the West of Ireland by increasing international bed-nights and revenue and by sustaining and creating employment in the geography. A key element of the project is the identification of Discovery Points and Embarkation Points which have been identified as 'must see' destinations. A total of 188 such locations have been identified along the route and these locations are being enhanced to improve the visitor experience.

## Appendix B – Fáilte Ireland's Guidance on Sustainable Tourism

**NOTE:** *These principles were developed with tourism development in mind. The principles however can be utilised in the assessment of aquaculture developments and the likely impacts that they may have on tourism activities. [\*In particular principles 2, 3 & 4]*

Fáilte Ireland has developed five key principles that ensure developments achieve a balance between appropriate tourism development and economic, environmental and social sustainability. It is recommended that developments are assessed having regard to compliance with these and associated policies.

**Principle 1:** Tourism, when it is well managed and properly located, should be recognised as a positive activity which has potential to benefit the host community, the place itself and the visitor alike. Sustainable tourism planning requires a balance to be struck between the needs of the visitor, the place and the host community.

**Principle 2:** Our landscapes, our cultural heritage, our environment and our linguistic heritage all have an intrinsic value which outweighs their value simply as a tourism asset. However, sustainable tourism planning makes sure that they can continue to be enjoyed and cherished by future generations and not prejudiced simply by short term considerations. \*

**Principle 3:** Built development and other activities associated with tourism should in all respects be appropriate to the character of the place in which they are situated. This applies to the scale, design and nature of the place as well as to the particular land use, economic and social requirements of the place and its surroundings. \*

**Principle 4:** Strategic tourism assets – including special landscapes, important views, the setting of historic building and monuments, areas of cultural significance and access points to the open countryside, should be safeguarded from encroachment by inappropriate development. \*

**Principle 5:** Visitor accommodation, interpretation centres and commercial / retail facilities serving the tourism sector should generally be located within established settlements thereby fostering strong links to a whole range of other economic and commercial sectors and sustaining the host communities. Sustainable tourism facilities, when properly located and managed can, especially if accessible by a range of transport modes, encourage longer visitor stays, help to extend the tourism season and add to the vitality of settlements throughout the year.

Underlying these principles for Sustainable Tourism, the definitions of economic, environmental and social sustainability against which any tourism project assessed are defined as follows:

**Economic Sustainability** must be considered to ensure that the tourism sector is managed. The key strengths of the County include landscape, heritage, natural environment, lifestyle and amenity pursuits. The sector is highly affected by seasonality and there are extremes in visitor numbers at key attractions contrasted with smaller attractions which struggle to maintain visitor numbers. These ‘peaks and troughs’ should be carefully managed to ensure the protection of natural resources. Tourism innovation should also be encouraged – particularly where it brings about environmental benefits. Finally, for projects to be economically sustainable they should meet the needs of the permanent and also visitor population alike, so the preparation of robust business plans for all such development will ensure proposals are viable and sustainable.

**Environmental Sustainability** will be central to the development and protection of a viable tourism sector and this is a key consideration in the County where tourism attractions are located in environmentally sensitive areas and close to historic areas where the quality of the built heritage and environment must be protected from inappropriate development – whether tourism related or not. The ‘mainstreaming’ of policy guidance tools such as the Strategic Environmental Assessment (SEA) will undoubtedly address any deficits in relation to many of these key policy areas.

**Social sustainability** is arguably more difficult to assess. Many of the potentially negative impacts of tourism development can however be addressed through careful consideration of the social and cultural nature of the receiving environment. The impacts that large-scale developments can have on existing local communities' policies can be assessed having regard to the impact of visitor numbers on local quality of life, culture and heritage – with a particular emphasis placed on unique areas such as culturally sensitive areas where small impacts over time may have a significant cumulative effect.

## ***Appendix C– Fáilte Ireland's Guidelines on the Treatment of Tourism in an Environmental Impact Statement, 2011***

### **Guidelines on the treatment of tourism in an Environmental Impact Statement**

#### **1. Introduction**

Tourism is a significant component of the Irish Economy – estimated to employ approximately 205,000 people – and contributing €6.6 billion in spending to the economy in 2014. The environment is one of the main resources upon which this activity depends – so it is important that the EIS evaluates whether and how the interacting impacts of a project are likely to affect tourism resources.

The purpose of this short note is to provide guidance on how these impacts can be assessed through the existing EIA process. Undertaking an EIA is governed by the EIA Advice Notes published by the EPA. These Advice Notes contain detailed guidance on how to describe and evaluate the effects arising from a range of projects, including tourism projects.

These guidelines were written with the assistance of Conor Skehan, Head of Department of Environment and Planning, Dublin Institute of Technology.

#### **2. Tourism and the Environment**

There are two interactions between tourism and the environment.

1. Impacts caused by Tourism Projects
2. Impacts affecting Tourism (e.g. the quality of a destination or a tourism activity)

### **Impacts caused by Tourism Projects**

Tourism projects can give rise to effects on the environment. These are specifically dealt with under a number of Project Types in the Advice Notes, specifically:

#### **12 TOURISM AND LEISURE**

- a. Ski-runs, ski-lifts and cable-cars where the length would exceed 500 metres and associated developments. Project Type 20
- b. Sea water marinas where the number of berths would exceed 300 and fresh water marinas where the number of berths would exceed 100. Project Type 10
- c. Holiday villages which would consist of more than 100 holiday homes outside built-up areas; hotel complexes outside built-up areas which would have an area of 20 hectares or more or an accommodation capacity exceeding 300 bedrooms. Project Type 28
- d. Permanent camp sites and caravan sites where the number of pitches would be greater than 100. Project Type 28
- e. Theme parks occupying an area greater than 5 hectares. Project Type 29

**Figure 1 The Advice Notes contain detailed descriptions on how to describe and evaluate the effects arising from a range of tourism projects.**

### **Impacts affecting Tourism**

Environmental effects of other projects on tourism are not specifically addressed in the Advice Notes. Taking account of the significance of tourism to the Irish economy a specialist topic of 'Tourism' has been prepared to facilitate a systematic evaluation of effects on this sector within the format laid down for other parts of the Environmental Impact Statement.

It is not intended that the assessment of effects on tourism should become a separate section of the Impact Statement, instead it is intended to become a specialist sub-section of the topic 'Human Beings' which is currently described in Section 2 of the Advice Notes

### **3. Tourism in the Existing Environment**

#### **Introduction**

Visitor attitude surveys reveal that the following factors – in order of priority – are the reasons that tourists visit and enjoy Ireland:

- Beautiful scenery
- Friendly & hospitable people
- Safe & Secure
- Easy, relaxed pace of life
- Unspoilt environment
- Nature, wildlife, flora
- Interesting history & culture
- Plenty of things to see and do
- Good range of natural attractions

It is noteworthy that over half of the factors listed are environmental and that all others are related to the way of life of the people. The following describes how these factors are considered within an EIS, set out under EIA topic headings, and how they interact with tourism.

#### *Beautiful scenery*

This is covered in the '*Landscape*' Section. Particular attention needs to be paid to effects on views from existing purpose-built tourism facilities, especially hotels, as well as views from touring routes and walking trails. It is important to note that there appears to be evidence that the visitor's expectations of 'beautiful' scenery does not exclude an admiration of new modern developments – such as windfarms – which appear to be seen as indicative of a modern, informed and responsible attitude to the environment.

#### *Friendly & hospitable people*

This is not an environmental factor though it is indirectly covered under the '*Human Beings*' section of the EIS. The principal factor is the ratio of visitors to residents. This is of less significance in areas with long-established patterns of tourism.

### *Safe & Secure*

This is not an environmental issue – though some of the factors that are sometimes covered under the heading of ‘*Human Beings*’ – such as social inclusion or poverty – can point to likely effects and interactions.

### *Easy, relaxed pace of life*

This is not an environmental issue though it is partially covered under ‘*Human Beings*’ – see comments above.

### *Unspoilt environment*

This is covered under the sections dealing with ‘*Landscape*’, ‘*Flora*’ and ‘*Fauna*’ and to a lesser extent under emissions to ‘*Water*’ and ‘*Air*’. In some instances traffic congestion, especially in rural areas, can be an issue, this is usually covered within ‘*Material Assets*’.

### *Nature, wildlife, flora*

This is principally covered under the headings of ‘*Flora*’ and ‘*Fauna*’ and to a lesser extent by ‘*Landscape*’, ‘*Water*’ and ‘*Air*’. The principal issues being to avoid any effects that might reduce the health or extent of the habitats. This can occur either directly, by impinging on the site, or indirectly, through emission, that can affect the natural resources, like clean water, which the habitat depends on. It also considers effect on physical access to and visibility of these sites. Occasionally there are concerns about the disturbance or wear and tear of visitor numbers to such sites.

### *Interesting history & culture*

This is principally covered under ‘*Cultural Heritage*’ and, to a lesser extent, under ‘*Human Beings*’. The principal issues being to avoid damage to sites and structures of cultural, historical, archaeological or architectural significance – and to their contexts or settings. It also considers effect on physical access to and visibility of these sites. Occasionally there are concerns about the wear and tear of visitor numbers to such sites.

### *Plenty of things to see and do.*

This is not an environmental issue though it is partially covered by the ‘*Human Beings*’ section, where the tourism resources of an area are described and assessed.

### *Good range of natural attractions*

This is covered by the ‘*Landscape*’, ‘*Flora*’, ‘*Fauna*’, and ‘*Cultural Heritage*’ sections of the EIS.

## 4. Project factors affecting Tourism

### Introduction

Tourism can be affected both by the structures or emissions of new developments as well as by interactions between new activities and tourism activities – for example the effects of high volumes of heavy goods vehicles passing through hitherto quiet, scenic, rural areas. Tourism can be affected by a number of the characteristics of the new project such as:

- New Developments
  - Social Considerations
  - Land-uses and Activities
- 
- *New Developments* - will the development stimulate or suppress demand for additional tourism development in the area? If so, what type, how much and where? Marinas, golf courses, other major sporting facilities as well as theme parks and larger conference facilities can all stimulate the emergence of new accommodation, catering and leisure facilities often within an extensive area around a new primary visitor facility. Extensive urbanisation and large scale infrastructure as well as certain processing and extractive industries all have the potential to suppress demand for additional tourism – but usually only in the immediate locality of the new development. It should be noted however, that some types of new or improved large scale infrastructure – such as roads – can improve the visitor experience – by increasing safety and comfort or can convey a sense of environmental responsibility – such as wind turbines.
  - *Social Consideration* - will the development change patterns and types of activity and land use? Will it affect the demographics, economy or social dynamics of the locality?
  - *Land-use* - will there be severance, loss of rights of way or amenities, conflicts, or other changes likely to ultimately alter the character and use of the tourism resources in the surrounding area?

### Existing Tourism

In the area likely to be affected by the proposed development, the following attributes of tourism, or the resources that sustain tourism, should be described under the following headings.



Note that the detailed description and analysis will usually be covered in the section dealing with the relevant environmental topic – such as ‘*Landscape*’. Only the relevant finding as to the likely significance to, or effect on, tourism needs to be summarised in this section.

### **Context**

Indicate the location of sensitive neighbouring tourism resources that are likely to be directly affected, and other premises which although located elsewhere, may be the subject of secondary impacts such as alteration of traffic flows or increased urban development. The following should be noted in particular:

- Hotels, conference centres, holiday accommodation – including holiday villages, holiday homes, and caravan parks.
- Visitor centres, Interpretive centres and theme parks
- Golf courses, adventure sport centres and other visitor sporting facilities
- Marinas and boating facilities
- Angling facilities
- Equestrian facilities
- Tourism-related specialist retailers and visitor facilities
- Historic and Cultural Sites
- Pedestrian, cycling, equestrian, vehicular and coach touring routes

Indicate the numbers of premises and visitors likely to be directly affected directly and indirectly.

Identify and quantify, where possible, their potential receptors of impacts, noting in particular transient populations, such as drivers, walkers, seasonal and other non-resident groups.

Describe any significant trends evident in the overall growth or decline of these numbers, or of any changes in the proportion of one type of activity relative to any other.

Indicate any commercial tourism activity which likely to be directly affected, with resultant environmental impacts.

### **Character**

Indicate the occupations, activities or interests of principal types of tourism in the area. – Where relevant, describe the specific environmental resources or attributes in the existing

environment which each group uses or values; where relevant, indicate the time, duration or seasonality of any of those activities. For example describe the number of guides, boats and anglers who use a salmon fishery and the duration of the salmon season as well as the quantity and type of local accommodation that is believed to be used by the anglers.

### **Significance**

Indicate the significance of the principal tourism assets or activities likely to be affected. Refer to any existing formal or published designation or recognition of such significance. Where possible provide an estimate of the contribution of such tourism activities to the local economy. For instance refer to the number of annual visitors to a tourism attraction or to the grading of a hotel.

### **Sensitivity**

Describe any significant concerns, fears or opposition to the development known to exist among tourism interests. Identify, where possible, the particular aspect of the development which is of concern, together with the part of the existing tourism resource which may be threatened. For instance describe the extent of a potential visual intrusion onto a site of historic significance which is the main local tourist attraction.

## **5. Impacts on Tourism**

### **"Do Nothing" Impact;**

Describe how trends evident in the existing environment will continue and how these trends will affect tourism.

### **Predicted impact;**

- Describe the location, type, significance, magnitude/extent of the tourism activities or assets that are likely to be affected.
  
- Describe how the new development will affect the balance between long-established and new dwellers in an area and its effect on the cultural or linguistic distinctiveness of an area. For example describe the effect of a new multi-national population required for an international call-centre located in a Gaeltacht area.

- Describe how changes in patterns of employment, land use and economic activity arising from the proposed development will affect tourism, for example, illustrating how a new industrial development will diversify local employment opportunities thereby reducing the area's unsustainable over-reliance on seasonal tourism.
- Describe the consequences of change, referring to indirect, secondary and cumulative impacts on tourism; Examples can include describing how the new development may lead to a reduced assimilative capacity for traffic or water during the peak of the tourism season or how new urbanism combined with existing patterns of tourism may lead to unsustainable levels of pedestrian traffic through a sensitive habitat.
- Describe the potential for interaction between changes induced in tourism and other uses that may affect the environment – for instance increasing new tourism-related housing affecting water resources or structures
- Describe the worst case for tourism if all mitigation measures fail.

## 6. Mitigating adverse impact on Tourism

Describe the mitigation measures proposed to:

- *avoid* sensitive tourism resources – such as views, access, and amenity areas including habitats as well as historical or cultural sites and structures.
- *reduce* the exposure of sensitive resources to excessive environmental burdens arising from the development's emissions or volumes of traffic [pedestrian and vehicular], and/or losses of amenity arising from visually conspicuous elements of the development – for example by prioritizing visual screening of views from a hotel towards a quarry.
- *reduce* the adverse effects to tourism land uses and patterns of activities – especially through interactions arising from significant changes in the intensity of use or contrasts of character or appearance – for example by separating traffic routes for industrial and tourism traffic.
- *remedy* any unavoidable significant residual adverse effects on tourism resources or activities, for example by providing alternative access to tourism amenities – such as waterways or monuments.