Dublin Mountains Destination & Experience Development Plan

SEA Environmental Report Non-Technical Summary

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Strategic Assessment

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Glossary

Appropriate Assessment

The obligation to undertake Appropriate Assessment derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC. AA is a focused and detailed impact assessment of the implications of a strategic action or project, alone and in combination with other strategic actions and projects, on the integrity of a Natura 2000 site in view of its conservation objectives.

Biodiversity and Flora and Fauna

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

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

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

Environmental Problems

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

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

Environmental Vectors

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

Mitigation Measures

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

Protected Structure

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

Recorded Monument

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

SEA (Strategic Environmental Assessment)

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

SEA Scoping

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

Strategic Actions

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

Strategic Environmental Objective (SEO)

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

1 Introduction

1.1 Overview

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

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

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

1.2 Destination & Experience Development Plans

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

The Plan has identified a range of key initiatives that are designed to raise awareness of the destination, increase the length of stay in the area, expand the range and quality of visitor experiences, strengthen the value of tourism to local communities and protect the quality, character and distinctiveness of the local environment, heritage and culture. Fáilte Ireland's corporate strategy 2026-2029, the Tourism Policy Framework 2025-2030, and the Department of Enterprise, Tourism and Employment's *A New Era for Irish Tourism: National Tourism Policy Statement* together provide an overarching strategic framework for the Dublin Mountains DEDP.

1.3 Strategic Environmental Assessment

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

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

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

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

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

1. S.I. No. 435 of 2004 The European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, as amended by S.I. No. 200 of 2011 The European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011; and
2. S.I. No. 456 of 2025 European Union (Land Use Planning – Strategic Environmental Assessment) Regulations 2025.

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

The latter regulations (S.I. No. 456 of 2025) relate to SEA as it applies to plans or programmes where the context requires, *"a regional spatial and economic strategy, a development plan, or a planning scheme"*, and are not applicable to the Dublin Mountains DEDP.

1.4 The Requirement for Strategic Environmental Assessment of the Plan

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

a) *which are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use and which set the framework for future development consent of projects listed in Annexes I and II to* the EIA Directive[2], or

b) *which, in view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of the 92/43/EEC* (Habitats Directive)[3] i.e. requires that SEA is undertaken where Stage 2 Appropriate Assessment is being undertaken on the plan or programme.

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

The Plan does, however, fall under the definition of a "plan" contained within the *Birds and Natural Habitats Regulations 2011 (as amended)* and therefore, must be screened for the requirement to undertake Appropriate Assessment (AA) in accordance with Article 6(3) of the Habitats Directive (92/43/EC). The Screening for AA (BSM, 2026) has found that the Plan has the potential, if unmitigated, to affect the ecological integrity of European sites and that measures to ensure that potential effects

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

[3] Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora

are avoided are required. Therefore, in accordance with Article 3(2)(b) above and guidance provided in SEA Circular Letter SEA 1/08 & NPWS 1/08[4], a SEA of the Dublin Mountains DEDP has been undertaken.

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

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

2 Outline Description of the Plan

2.1 Introduction

The Dublin Mountains Destination and Experience Development Plan (DEDP) is a five-year sustainable tourism plan for south County Dublin. The plan is centred on the Dublin Mountains and builds upon the Dublin Regional Tourism Development Strategy 2023-2027.

The Dublin Mountains area is at the southernmost end of County Dublin on the boarder of County Wicklow. The Dublin Mountains are just north of the Wicklow Mountains.

Given the rocky landscape, the area is predominantly rural with key excursions and activities throughout the region. The Plan aims to improve the overall awareness of the experiences available.

The region is a sprawling combination of woodlands, hills, mountains and pastures. It builds on predominantly outdoor experiences including orienteering, mountain biking, running, walking and hiking.

The Dublin Mountains region is current managed under the *Dublin Mountain Partnership's Strategic Plan 2022-2026* launched by the Dublin Mountains Partnership (DMP). The DMP is a multidisciplinary management group with members from Coillte, South Dublin County Council, Dún Laoghaire-Rathdown County Council, Dublin City Council, National Parks and Wildlife Service, the Dublin Mountains Initiative and Fáilte Ireland. The principal purpose of the partnership is to *'improving the recreational experience for users of the Dublin Mountains, whilst recognising the objectives and constraints of the various landowners.'*

The area contains a range of recreational sites including the Hell Fire Club, Massy's Estate, Glenasmole, Rathmichael Wood and Ticknock among others, which lends itself well to slow adventure activities and sports tourism, in particular mountain biking and walking trails. Key attractions in the area include the Dublin Mountain Way, mountain biking trails and the Glencullen Adventure Park.

The National Tourism Policy Statement (December 2025) introduced five strategic pillars for tourism development which have shaped the Dublin Mountains DEDP;

1. Delivering the Best Visitor Experiences
2. Promoting a Vibrant and Creative Tourism Enterprise Sector
3. Empowering Communities
4. Growing a Sustainable Future
5. Implementing and Data

The Dublin *Regional Tourism Development Strategy 2023-2027* sets a 5-year strategy for tourism development that will increase the commercial potential of Dublin and cater to visitors while conserving the natural environment and improving the lives of locals. In the context of an evolving global focus on sustainability and climate action, a regenerative approach to tourism ensures community and place are at the centre of the tourism model, collectively working towards delivering a net positive benefit for all stakeholders – Visitor, Industry, Community and the Environment. A regenerative approach encourages tourism to give back more than it takes through engaging the visitor and industry in protecting and enhancing nature and its habitats, the host communities and local places. Nature will be central to destination development with the environment and sustainability front of mind in all future decision making.

2.2 Vision

The vision for the Dublin Mountain Destination and Experience Development Plan sets a vision for 2036:

> *"The Dublin Mountains invite visitors to experience Dublin from above, where spectacular views, rich heritage, signature trails and unforgettable outdoor adventures combine to offer a city break with a difference, revealing a side of Dublin found nowhere else.*
>
> *As a distinctive part of Dublin's City, Coast and Mountains proposition, the Dublin Mountains broaden the appeal of the destination, encouraging visitors to stay longer, explore further, connect with nature and discover experiences beyond the traditional city break. Easy access and stronger connections between Dublin City, local communities and the mountains benefit residents and visitors alike, making it easier to experience, access and enjoy more of the destination, while a growing range of unique accommodation encourages deeper engagement with its landscapes and communities.*
>
> *Through a shared commitment to stewardship, the natural, cultural and archaeological assets that make the Dublin Mountains unique are protected, celebrated and enhanced for future generations."*

2.3 Strategic Objectives

The Plan is structured around the following strategic objectives and are closely aligned to the Strategic Objectives that are set out for the wider Dublin region in the *Regional Tourism Development Strategy 2023-2027*:

Strategic Objective 1: Dublin Mountains Destination
Establish the Dublin Mountains as a Leading Outdoor Destination within Dublin's City, Coast and Mountains Proposition. **Goal:** The Dublin Mountains is established as a recognised and accessible part of Dublin's city, coast and mountains proposition, supported by improved visitor access, stronger gateway hubs, enhanced visitor orientation and a growing range of overnight accommodation options.
Strategic Objective 2: Inspiring Dublin Mountains Experiences
Develop the Dublin Mountains experience base through product investment that delivers memorable outdoor experiences and epic views over the city and coast. **Goal:** The Dublin Mountains offers a distinctive portfolio of signature visitor experiences, anchored by the Dublin Mountains Way, the Dublin Mountains Visitor Centre, landmark viewpoints and outdoor adventure experiences, encouraging visitors to explore more of the destination and engage more deeply with its landscapes, heritage and culture.
Strategic Objective 3: Dublin Mountains Tourism Businesses
Support new and existing tourism businesses in the development of experiences that inspire visitors to explore the Dublin Mountains. **Goal:** A strong and collaborative tourism industry supports a growing range of bookable experiences, strengthens local enterprise development and increases the economic and community benefits generated through tourism across the Dublin Mountains destination.
Strategic Objective 4: Dublin Mountains Stewardship & Environment

Implement a sustainable tourism development approach that is compatible with the conservation of the Dublin Mountains diverse natural, heritage, archaeological and cultural resources.

Goal: A shared approach to destination stewardship is in place, supported by visitor capacity assessments, environmental monitoring and sustainable business practices that safeguard the biodiversity, heritage and landscape quality of the Dublin Mountains.

2.4 Destination Catalyst Overview

To achieve the above strategic objectives, the Dublin Mountains DEDP focuses on a number of 'catalyst projects' and 'supporting projects'. The progress of the DEDP will be measured against the specified 'target outcomes', the catalyst projects and their aims are as follows:

Transport and Access

The research and consultation consistently identified access as one of the most significant barriers to tourism growth within the Dublin Mountains. While the destination benefits from its position within Dublin's wider visitor offering, access to many of its key visitor experiences remains heavily dependent on private vehicles and connectivity between gateway hubs, recreation sites and visitor experiences can be challenging. Addressing these issues represents one of the most important opportunities within the DEDP. Improving sustainable transport, visitor mobility and active travel connections will help strengthen the role of the Dublin Mountains within Dublin's City, Coast and Mountains proposition while supporting greater visitor dispersal and more sustainable visitor movement throughout the destination.

Accommodation

The accommodation profile of the Dublin Mountains presents both a challenge and a significant opportunity. While the Core Experience Zone currently contains only a limited number of registered tourism bed places, substantial accommodation capacity already exists within adjoining visitor gateway hubs. The opportunity is not simply to increase accommodation supply, but to create more compelling overnight reasons to stay within and around the Dublin Mountains through alternative outdoor accommodation, farm diversification initiatives and stronger connections between accommodation providers and visitor experiences. Increasing overnight engagement will be critical to strengthening the economic contribution of tourism within the destination.

Dublin Mountains Visitor Centre: Hellfire Club & Massy's Estate Project

The Dublin Mountains Visitor Centre represents one of the most significant opportunities to enhance the overall visitor experience and create a gateway to the destination. It will provide a place of orientation and interpretation, helping visitors understand the geography, archaeology, history and heritage of Montpelier Hill, Massy's Wood, the Hell Fire Club and the wider Dublin Mountains region. By providing a café, shop, toilets, walkers' lounge, interpretive exhibition and education facilities, the Visitor Centre will significantly enhance the experience of walkers, visitors and local communities. It will showcase the natural, cultural and built heritage of the Dublin Mountains in a way that can be appreciated and protected for future generations. The wider project includes preservation works to the Hellfire Club building, improved access, enhanced walking trails and a tree-top walkway into Massy's Wood. Together, these elements have the potential to create a compelling gateway experience that encourages visitors to explore more of the Dublin Mountains and engage more deeply with its landscapes, heritage and stories.

Core Experience Zone Development

The Dublin Mountains already contains a significant concentration of trails, forests, recreation sites, heritage assets and viewpoints. However, visitors often experience these assets as individual locations

rather than as part of a connected destination. The Core Experience Zone provides a framework for improving connectivity, visitor orientation, interpretation and experience development, helping create a more coherent visitor journey and a stronger sense of destination.

Dublin Mountains Way

Walking is already one of the most popular ways visitors experience the Dublin Mountains, and the Dublin Mountains Way provides an opportunity to link many of the destination's landscapes, heritage assets, communities and outdoor experiences. The original vision for the trail identified opportunities to strengthen its appeal through enhanced infrastructure, accessibility, interpretation and visitor engagement. As a route that traverses and connects much of the destination, the Dublin Mountains Way can play an important role in creating a more connected visitor experience and strengthening the overall identity of the destination.

Monumental Mountain Viewpoints

Scenic views consistently emerged as one of the most memorable aspects of the Dublin Mountains visitor experience. The dramatic panoramas across Dublin City, Dublin Bay and the surrounding landscape are among the destination's most distinctive assets. Creating opportunities for visitors to engage more deeply with these views and the stories connected to them can transform an existing strength into a defining feature of the Dublin Mountains visitor proposition.

World-Class Mountain Biking Destination

Mountain biking is already one of the Dublin Mountains' strongest outdoor recreation assets and a key differentiator within the wider Dublin region. Building on this established reputation presents an opportunity to increase visitor engagement, strengthen the destination's adventure appeal and create stronger links with the wider Wicklow mountain biking proposition. Continued enhancement of trail quality, visitor facilities, connectivity and trail sustainability will help maintain the destination's reputation as a leading mountain biking location.

Experience Development & Market Readiness Programme

While the Dublin Mountains benefits from a strong outdoor recreation offer and growing visitor interest, there remains a limited number of visitor experiences that can be booked, promoted and sold as part of the Dublin Mountains visitor proposition. Supporting businesses to develop and package visitor experiences presents an opportunity to create more reasons to visit the destination, encourage longer stays and increase visitor spend across the area.

Dublin Mountains Stewardship Programme

The Dublin Mountains is a valued recreation landscape enjoyed by local communities, recreation users and visitors alike. Balancing increasing levels of recreation and tourism activity with the protection of its landscapes, biodiversity, heritage and community wellbeing represents one of the key long-term stewardship challenges for the destination. Through visitor management assessments, visitor monitoring and collaborative stewardship initiatives, this project will provide a coordinated framework for the sustainable management of the destination while helping safeguard the assets that underpin its long-term appeal.

The catalyst initiatives detailed above will be supported through a significant number of supporting projects and progress will be assessed using the target outcomes, which are individually listed in the DEDP Action Plan (Appendix 1).

The complete list of catalyst projects, supporting projects and target outcomes are provided and are assessed in **Appendix 1**.

3 Strategic Environmental Assessment

3.1 Introduction

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

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

Article 1 of the SEA Directive states that:

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

The SEA Directive was transposed into Irish law through:

- Statutory Instrument (S.I.) No. 435 of 2004 (the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004), as amended by S.I. No. 200 of 2011 (the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011); and
- S.I. No. 456 of 2025 European Union (Land Use Planning – Strategic Environmental Assessment) Regulations 2025.

S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011, relates to SEA as it applies to plans or programmes prepared for *"agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism and town and country planning or land use, and which set the framework for future development consent of projects listed in Annexes I and II to the Environmental Impact Assessment Directive."*[6].

S.I. No. 456 of 2025, relates to SEA as it applies to plans or programmes where the context requires, *"a regional spatial and economic strategy, a development plan, or a planning scheme"*[7].

Given the nature of the Plan, the SEA for the Dublin Mountains DEDP is being prepared under the requirements of S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011.

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

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

[5] SEA Directive: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN
[6] See Section 9(1)(a)
[7] Section 5(c)

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

> *"…the preparation of an environmental report, the carrying out of consultations, the taking into account of the environmental report and the results of the consultations in decision-making and the provision of information on the decision…"*[8]

3.2 SEA Stages and Process

The key focus of SEA is to take environmental issues, and in particular '*likely significant environmental effects*' of a P / P, into consideration during the plan or programme making process. The key stages in the SEA process as they relate to the Dublin Mountains DEDP are outlined in Table 3.1 below.

Table 3.1 Outline of the SEA Process

Stage	Description	Status
1. Screening	The requirement to undertake a SEA is mandatory for certain Plan / Programme (P / P). Where SEA is not a mandatory requirement, the P / Ps is subject to a 'Screening process', to consider if it is *likely to have significant effects* on the environment, and therefore, if SEA is required. The preparation of the *Draft Dublin Mountains DEDP* has been screened for Appropriate Assessment (AA) and it has been concluded that potential for effects on the integrity of European sites cannot be excluded beyond all reasonable scientific doubt and is required to undergo Appropriate Assessment. Therefore, in accordance with *Circular Letter SEA 1/08 & NPWS 1/08* the *Draft Dublin Mountains DEDP* was also required to undergo a Strategic Environmental Assessment (SEA) in accordance with *Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment* (known as the SEA Directive).	Completed ✓
2. Scoping	Preparation of a SEA Scoping Report highlighting that the Environmental Report is required to include: - methods of assessment; - contents and level of detail in the Plan / Programme; - the stage in the Plan or Programme-making process; and - the extent to which certain matters are more appropriately assessed at different levels in the decision-making process in order to avoid duplication of environmental assessment. Scoping provides for consultation with the Environmental Authorities specified in Article 13 of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011, and the process allows for incorporation of the views of the environmental authorities within the P / P and the SEA Environmental Report.	Completed ✓

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

Stage	Description	Status
3. Environmental Report	Preparation of a systemic identification and evaluation of alternatives and assessment of the *likely significant environmental effects* of implementing the P / P. The findings of the assessment, which is carried out at various stages in the P / P making (*e.g.* Draft, Amended Draft *etc.*), are provided in the SEA Environmental Report in accordance with Article 12 (including Schedule 2) of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011. The output from this stage is an Environmental Report which accompanied the draft P / P required on public display.	Completed ✓
4. SEA Statement	Completion / adoption of the Final Dublin Mountains DEDP, taking account of *likely significant environmental effects*, any submissions or observations received from consultations and integration of mitigation and monitoring measures within the Plan. The Environmental Report is concluded and an SEA Statement is prepared in accordance with Article 16(2)(b) of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011, summarising: ▪ how environmental considerations have been integrated into the Plan / Programme; ▪ how the environmental report, and any submissions /observations or consultations have been taken into account in the preparation of the Plan / Programme; ▪ the reasons for choosing the Plan / Programme in light of the other reasonable alternatives dealt with; and ▪ the measures decided for monitoring the significant environmental effects of implementation of the Plan / Programme.	Current Stage

3.3 SEA Screening and Requirement for SEA

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

Screening for the purposes of SEA is defined as "*the determination of whether implementation of a P / P [Plan or Programme] would be likely to have significant environmental effects on the environment. The process of deciding whether a P / P [Plan or Programme] requires SEA.*"[9] The criteria for screening, i.e. determining whether a particular plan is likely to have significant environmental effects are set out in Annex II of the SEA Directive. These criteria are reproduced in Schedule 1 of S.I. No. 435 of 2004, as amended by S.I. No. 200 of 2011. The criteria are set out under two principal headings, each of which have a number of sub-criteria:

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

[9] EPA: http://www.epa.ie/pubs/advice/ea/SEA%20Pack%202018.pdf

It is also noted that in accordance with Circular Letter SEA 1/08 & NPWS 1/08[10], SEA for a P / P is also a mandatory requirement where the P / P requires Appropriate Assessment (AA) under Article 6(3) of the Habitats Directive (92/43/EEC).

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

Therefore, in accordance with *Circular Letter SEA 1/08 & NPWS 1/08*[11] the Draft Dublin Mountains DEDP was also required to undergo Strategic Environmental Assessment (SEA) in accordance with *Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment*[12] (the *SEA Directive*).

This Environmental Report has been prepared as the Dublin Mountains DEDP is subject to requirements of SEA.

3.4 SEA Scoping

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

The consultation was undertaken with the following Environmental Authorities specified in Article 9(5) of S.I. No. 435 of 2004, as amended, on 18th June 2025:

- Environmental Protection Agency (EPA);
- The Minister for Housing, Local Government and Heritage;
- Department of Enterprise, Tourism & Employment;
- Department of Climate, Energy and Environment;
- The Manager of the Development Applications Unit;
- The Department of Agriculture, Food and the Marine.

Submissions / observations on the scoping of the Environmental Report were received from the environmental authorities and comments have been incorporated into the Plan and Environmental Report as set out in Table 3.2.

[10] https://www.npws.ie/sites/default/files/general/circular-sea-01-08.pdf
[11] https://www.npws.ie/sites/default/files/general/circular-sea-01-08.pdf

[12] DIRECTIVE 2001/42/EC: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN

Table 3.1 SEA Scoping Submissions / Observation from Environmental Authorities

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
Environmental Protection Agency (EPA)	The submission from EPA includes the following comments and recommendations: Governance and implementation – The Plan should set out the implementation arrangements and governance structures including lines of responsibility for implementation, delivery, interim review and progress reporting. The Plan should address the relationship with the National Planning Framework, Regional Spatial and Economic Strategies, existing Local Authority plans/ programmes.	The information provided has informed the preparation of the Plan and the Environmental Report.
	Synergies with key national plan – EPA recommends that the Plan documents the synergies with the key national plans and programmes. The relevant actions of the Climate Action Plan 2025 (and Climate Action Plan 2026 under preparation) and the objectives and policy commitments of the National Planning Framework, River Basin Management Plan, and the Eastern & Midland Regional Spatial and Economic Strategy should be aligned with and considered, as appropriate.	
	Integration of the SEA and the Plan – EPA highlights that the integration of the SEA process into the Plan should reflect the overall objective of the SEA Directive. It is essential for SEA to address climate and biodiversity issues and take account of the Ireland's climate crisis and biodiversity emergency. Recommendations from the SEA & AA including mitigation measures and monitoring proposals should be integrated into the Plan. SEA Environmental Report and the Plan should include a chapter on how the recommendations and mitigation measures have been incorporated into the Plan.	
	EPA recommend that the SEA Environmental Report includes summary tables outlining the key findings of the SEA and linking the significant environmental effects identified to the proposed mitigation measures, monitoring programme and Plan policies/measures.	
	EPA highlight their recently published guidance note to help provide guidance and ideas on how to carry out strategic environmental assessments (SEA) of tourism sectoral plans and	

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
	programmes in Ireland - 'Good Practice Guidance on Strategic Environmental Assessment (SEA) for the Tourism Sector' (EPA, 2023). Consideration should also be given to the Hen Harrier Threat Response Plan 2024-2028 (EPA 2024).	
	The submission describes the key findings and chapters of the 'State of the Environment Report- Ireland's Environment An Integrated Assessment 2020'. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies.	
	EPA highlights the requirement under the SEA Regulations to consult with Environmental Authorities (EPA, Minister of Housing, Local Government & Heritage, Department of Environment, Climate & Communications, Minister of Agriculture, Food and the Marine)	
	Appendix I to the EPA submission includes comments on the SEA Scoping Report - scope of the SEA, data and knowledge gaps, range of effects, monitoring, implementation & reporting, SEA statement, integration with other key Plans and Programmes, available guidance & resources, webtools.	
Development Applications Unit (DAU)	The DAU notes that the DEDP must make reference to local development plans to ensure the protection of archaeological heritage.	The information provided has informed the preparation of the Plan, AA and the Environmental Report.
	DAU highlights the significant overlap of the Dubin Mountains with European sites, including the Wicklow Mountains Special Area of Conservation (SAC) and the Wicklow Mountains Special Protection Area (SPA). It is required for the SEA and AA to evaluate the potential impact on QI's of these sites, and propose mitigation to reduce adverse effects including erosion caused by hikers, mountain bikers and the illegal use of motor bikes (especially on the mountain ridge to the west of Glenasmole), disturbance of ground nesting birds by humans and especially dogs and the burning of heath and blanket bog habitats by illegally set fires.	

Environmental Authority	Outline of Nature of the Submission	Response to consideration of nature of submission
Department of Climate, Energy and Environment (DCEE)	DCEE encourages the use of CAP25, the National Adaption Framework, Ireland's 4th National Biodiversity Action Plan 2023-2030, the Clean Air Strategy for Ireland and the Water Action Plan 2024 to assist with the preparation of the SEA materials.	The information provided has informed the preparation of the Plan, AA and the Environmental Report.
	DCEE includes relevant EU legislation to include in the assessment of the plan.	

3.5 SEA Environmental Report

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

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

The Draft Dublin Mountains DEDP, together with the SEA Environmental Report and Natura Impact Statement (NIS) will be placed on public display during which period submissions can be made on the Draft DEDP and on the environmental reports. Any such submissions will be taken into consideration in the finalisation of the DEDP and associated reports.

Consultation will also be undertaken with the Environmental Authorities as specified in Article 13 of S.I. No. 435 of 2004, as amended by Regulations S.I. No. 200 of 2011 for incorporation of the views of the Environmental Authorities within the Plan or Programme and the SEA Environmental Report.

3.6 SEA Statement

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

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

3.7 SEA Guidance

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

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

- Directive 2001/42/EC on the assessment of certain plans and programmes on the environment.
- S.I. No. 435 of 2004 – European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004.
- S.I. No. 200 of 2011 -Environmental Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011.

- Planning and Development Regulations 2001, as amended.
- Guidance on Implementation of Directive 2001/42/EC, European Commission, 2004, at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf
- SEA of Local Authority Land Use Plans - EPA Recommendations and Resources. EPA, 2026.
- SEA Pack. EPA, 2024.
- SEA Spatial Information Sources Inventory. EPA, 2026.
- SEA Resource Manual for Local and Regional Planning Authorities. EPA, 2015.
- Good Practice Guidance on Strategic Environmental Assessment (SEA) for the Tourism Sector. EPA, 2023.
- Good Practice Guidance on Strategic Environmental Assessment (SEA) and Landscape. EPA, 2023.
- Guidance on Strategic Environmental Assessment (SEA) Statements and Monitoring. EPA, 2023.
- Guidance on Strategic Environmental Assessment - Environmental Impact Assessment Tiering, EPA, 2021.
- Local Authority Climate Action Plan Guidelines. Department of the Environment, Climate and Communications, 2023.
- EPA Mapping. Environmental Mapping / Geographical Information System (GIS) tools are available at: http://gis.epa.ie/SeeMaps
- EPA Water and Air Quality Reports at: https://www.epa.ie/pubs/legislation/air/quality/
- EPA Ireland's State of the Environment Report 2024, https://www.epa.ie/publications/monitoring--assessment/assessment/state-of-the-environment/irelands-state-of-the-environment-report-2024.php
- EPA Ireland's Environment – An Integrated Assessment 2020 at: https://www.epa.ie/our-services/monitoring--assessment/assessment/irelands-environment/state-of-environment-report-/#
- SEA (EPA) Spatial Information Sources at: http://www.epa.ie/pubs/advice/ea/
- Developing and Assessing Alternatives in Strategic Environmental Assessment, EPA 2015 at: https://www.epa.ie/publications/research/biodiversity/EPA-157_web.pdf
- Integrating Climate Change into Strategic Environmental Assessment in Ireland - A Guidance Note. EPA, 2019.
- Climate Action Plan 2025. Department of Environment, Climate and Communications, 2025.
- Circular Letter PL 9/2013: Article 8 (Decision Making) of EU Directives 2001/42/EC on Strategic Environmental Assessment (SEA) as amended. Department of Environment, Community and Local Government, 2013.
- Circular Letter PSSP 6/2011: Further Transposition of EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA). Department of Environment, Community and Local Government, 2011.
- Circular Letter SEA 1/08 & NPWS 1/08: Appropriate Assessment of Land Use Plans. Department of Environment, Heritage and Local Government, 2008.
- Integrated Biodiversity Impact Assessment - Streamlining AA, SEA and EIA Processes: Practitioner's Manual. Strive Report Series No. 106. Department of Environment, Community and Local Government, 2013.
- Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment. European Commission 2013.
- Managing Natura 2000 Sites - The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. European Commission, 2000, at:

http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/provision_of_art6_en.pdf

- Assessment of plans and projects significantly affecting Natura 2000 sites - Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC. European Commission, 2002, at: http://ec.europa.eu/environment/nature/natura2000/management/docs/art6/natura_2000_asses s_en.pdf
- Appropriate Assessment of Plans and Projects in Ireland. National Parks and Wildlife Service, 2009, at: http://www.npws.ie/publications/archive/NPWS_2009_AA_Guidance.pdf

3.8 Appropriate Assessment

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

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

As set out in Department Circular Letter SEA 1/08 & NPWS 1/08[13] (15 February 2008), Screening for AA is of relevance to SEA screening in that *"where following screening, it is found that the draft plan or amendment may have an impact on the conservation status of a Natura 2000 site or that such an impact cannot be ruled out, adopting the precautionary approach:*

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

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

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

The AA has concluded that the Dublin Mountains DEDP will not affect the integrity of the Natura 2000 network.

[13] NPWS SEA letter: https://www.npws.ie/sites/default/files/general/circular-sea-01-08.pdf

4 Relationship with Plans and Programmes

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

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

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

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

Table 4.1 Legislative Framework

Legislative Framework	
Planning and Development Act 2000, as amended	Environmental Noise Directive (2002/49/EC)
Planning and Development Regulations 2001, as amended	Environmental Liability Directive (2004/35/EC)
Strategic Environmental Assessment (SEA) Directive (2001/42/EEC)	Fourth Daughter Directive (2004/107/EC)
Environmental Impact Assessment Directive (2011/92/EU) as amended by (2014/52/EU)	Renewable Energy Directive (2018/2001/EU) as amended by (EU/2023/2413)
Habitats Directive (92/43/EEC)	European Communities (Birds and Natural Habitats Regulations) 2011 (S.I. No. 477 of 2011) (as amended)
Birds Directive (2009/147/EC) on the Conservation of Wild Birds, 1979	Renewable Energies in the 21st Century: Building a More Sustainable Future
Water Framework Directive (WFD) (2000/60/EC)	EU 2020 climate and energy package
Groundwater Directive (2006/118/EC)	EU Renewable Energy Road Map
Flood Directive (2007/60/EC)	European Landscape Convention 2000
Bathing Water Directive (2006/7/EC)	Wildlife Acts 1976-2024

Legislative Framework	
Shellfish Waters Directive (2006/113/EC)	The Water Services Act (2007 – 2017)
Marine Strategy Framework Directive (2008/56/EC)	Foreshore Act 1933-2024
Urban Wastewater Directive (91/271/EEC)	Aquaculture Act 1997-2006
Drinking Water Directive (98/83/EC)	Sea Fisheries & Maritime Jurisdiction Act 2006
Waste Framework Directive (2008/98/EC)	The National Monuments Act 1930-2014
EU Landfill Directive (1999/31/EC)	Roads Act 1993, as amended
Air Quality Directive (2008/50/EC)	European Union (Birds and Natural Habitats) (Sea Fisheries) Regulations 2013, as amended
Directive (EU) 2024/2881 of the European Parliament and of the Council of 23 October 2024 on ambient air quality and cleaner air for Europe	Historic and Archaeological Heritage and Miscellaneous Provisions Act 2023

Table 4.2 Relevant National & Regional Plans and Programmes

National & Regional Plans and Programmes	
Project Ireland 2040 - National Planning Framework (NPF)	National Policy Position on Climate Action and Low Carbon Development
Updated Draft Revised National Planning Framework (November 2024)	Climate Action Plan 2024
National Development Plan (NDP) 2021-2030	National Sustainable Mobility Policy (2022)
Regional Planning Guidelines for the South-East Region 2010-2022	Spatial Planning and National Roads Guidelines (2012)
Regional Spatial and Economic Strategy (RSES) for the Northern and Western Region	The Traffic and Transport Assessment Guidelines (2014)
Ireland's Environment - An Integrated Assessment 2020	Transport Strategy for the Greater Dublin Area 2022-2042
National Mitigation Plan 2017	Design Manual for Urban Roads and Streets (2019)
Our Sustainable Future - A Framework for Sustainable Development for Ireland (2012)	Ireland's First National Cycle Policy Framework 2009
Housing for All – A New Housing Plan for Ireland (2021)	National Waste Management Plan for a Circular Economy 2024 - 2030
Sustainable Urban Housing: Design Standards for New Apartments (2023)	The National Renewable Energy Action Plan
Rebuilding Ireland: Action Plan for Housing and Homelessness - 2016	National Energy Efficiency Action Plan 2017-2020
National 4th Biodiversity Action Plan 2023-2030	Strategy for the Future Development of National and Regional Greenways 2018
Harnessing Our Ocean Wealth An Integrated Marine Plan for Ireland 2012	The National Broadband Plan 2020
National Strategic Plan for Aquaculture Development 2014- 2020	National Landscape Strategy for Ireland 2015-2025

National & Regional Plans and Programmes	
Draft National Strategic Plan for Aquaculture Development 2030	Architectural Heritage Protection Guidelines for Planning Authorities (2011)
National CFRAMS Programme	Heritage Ireland 2030
River Basin Management Plan for Ireland 2018-2021	Food Harvest 2020
River Basin Management Plan 2022-2027	National Adaptation Framework Planning for a Climate Resilient Ireland 2018 and Review of the National Adaptation Framework 2022
The Planning System and Flood Risk Management (2009)	Climate Action Plan 2024
South Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study	Water Services Strategic Plan / Capital Investment Programme (Uisce Éireann)
People, Place and Policy Growing Tourism to 2025	Regional Tourism Development Strategies (2023-2027) & Ireland's Hidden Heartlands Tourism Development Strategy 2023 - 2027
Fáilte Ireland Corporate Plan	Our Rural Future: Rural Development Policy 2021 – 2025
Tourism Action Plan 2019 – 2021	Actions to Promote Sustainable Tourism Practices 2021 - 2023
Strategy for the Future Development of National and Regional Greenways	The Shannon, Mighty River of Ireland, A Tourism Masterplan for the Shannon 2020 – 2030
National Physical Activity Plan 2013 – 2025	Ireland's State of the Environment Report 2024

Table 4.3 Relevant Local Plans and Programmes

Local Plans and Programmes	
South Dublin Development Plan 2022-2028	Dún Laoghaire-Rathdown Development Plan 2022-2028

5 Current State of the Receiving Environment (Environmental Baseline)

5.1 Introduction

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

5.2 Likely Evolution of the Environment in the Absence of the Dublin Mountains Destination & Experience Development Plan

The development plans for South Dublin and Dún Laoghaire-Rathdown promote the development and strengthening of the overall value of tourism in this region as stated below.

The South Dublin Development Plan 2022-2028 states that;

> ***Policy EDE19:*** *Support the development of a sustainable tourism industry that recognises the recreational and tourism potential of the County, building on the actions in the South Dublin County Tourism Strategy, 2015 or any superseding strategy.*

The Dún Laoghaire-Rathdown Development Plan 2022-2028 states that:

> ***Policy Objective E17****: It is a Policy Objective to co-operate with the appropriate agencies in promoting sustainable tourism and securing the development of tourist and recreation orientated facilities in the County. Furthermore, the Council will promote the implementation of the Dún Laoghaire-Rathdown Tourism Strategy & marketing Plan 2017-2022 and any subsequent update thereof.*

In the absence of the Dublin Mountains DEDP it is envisaged that the baseline environment would primarily evolve in line with the policies and objectives of the South Dublin Development Plan 2022-2028 and Dún Laoghaire-Rathdown Development Plan 2022-2028 (CDPs) and Local Area Plans (LAPs) for the Counties. The CDPs detail policies and objectives specific to tourism, however, the standalone Dublin Mountains DEDP provides significant opportunities for specific set of tourism-related mitigation measures and the associated likely positive environmental effects.

The Dublin Mountains DEDP will play an important role in promoting and developing tourism in the Dublin Mountains region help to attract visitors to the counties, enhance the visitor experience and support the growth and sustainability of the tourism industry.

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

5.3 Description of the Environmental Baseline

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

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

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

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

5.3.1 Biodiversity

Biodiversity plays a significant role in the provision of clean air, water, healthy soils and food as well as visually contributing to a plan area with its natural beauty and heritage.

The biodiversity within the study area underpins important economic sectors such as agriculture, tourism and recreation and is a core component of the green infrastructure. A number of areas in study area have been identified as being of exceptional importance for biodiversity at a national and/or international level and are protected through national and European legislation.

There are 4no. SACs and 1no. SPA within the study area. There are a further 16no. SACs and 10no. SPAs within the ZoI of the Dublin Mountains DEDP. Conservation objectives for SACs and SPAs have been set for the habitats and species for which the sites have been selected. Site specific detailed conservation objectives are available on the NPWS website[14]. Any potential for impact on European Sites have been fully addressed in the NIS that accompanies the Dublin Mountains DEDP and SEA Environment Report.

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

Under the requirements of the *Water Framework Directive* (WFD) a number of waterbodies (or parts of) must have extra controls on their quality by virtue of how their waters are used by people and by

[14] NPWS website 2019: https://www.npws.ie/protected-sites/conservation-management-planning/conservation-objectives

wildlife have been listed on Registers of Protected Areas (RPAs). A number of these protected areas are present within the study area and these are as follows:

- The entire ground waterbody beneath the study area is included on the Drinking Water - Ground Waterbody.
- Drinking Water – River. There are two designated drinking water rivers in the Plan area; the Dodder_020 and the Shanganagh_010.
-

Additionally, there is one designated Salmonid Water under the EU Freshwater Fish Directive on the border of the Plan area near Bray, the Dargle River (IE_EA_10D10010). The *Salmonid Regulations* (S.I. No. 293 of 1988) designate the waters capable of supporting salmon (Salmo *salar*), trout (*Salmo trutta*), char *(Salvelinus*) and whitefish (*Coregonus*) as protected. The Knocksink Wood Nature Reserve is also located on the border of the Dublin Mountains DEDP area, and is protected under Ministerial order.

5.3.1.1 Biodiversity Issues

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

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

5.3.2 Population and Human Health

The study area includes parts of South Dublin and Dún Laoghaire-Rathdown Local Authorities. The study area is surrounded by Dublin City and Fingal to the north, Kildare to the west, and Wicklow, Carlow and Wexford to the south. The *National Planning Framework* (NPF) outlines that by 2040 there will be roughly an extra one million people living in Ireland.

The 2022 Census results showed that the percentage in population change for South Dublin was 8.0% and Dún Laoghaire-Rathdown was 7.3%. There has been an increase in the population of the Counties from 2016 to 2022.

The tourism industry has long been recognised as an important economic driver for the economy of the State. Tourism is particularly important in that it can assist in providing business and employment opportunities across regions and leads to jobs across the spectrum of skills requirements. The quality and diversity of tourism in the study area is particularly strong in relation to its rich heritage, quality

rural landscape and many towns and villages, meaning the study area has a lot to offer as a tourist destination. The development plan promotes the development and strengthening of the overall value of tourism in the Dublin Mountains region as previously stated. The local authorities have an objective to enhance the potential for economic development in the tourism sector.

Visitor experience in the Dublin Mountains has been managed by the Dublin Mountain Partnership (DMP) since 2008. The DMP has representation from Coillte, South Dublin County Council, Dún Laoghaire-Rathdown County Council, Dublin City Council, National Parks and Wildlife Service and the Dublin Mountains Initiative, and Failte Ireland.

The current Dublin Mountains Destination Experience Development Plan builds on previous plans, focusing on regenerative tourism and economic growth that centres environmental conservation and community-benefit.

5.3.2.1 Existing Population and Human Health Issues

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

- Health and Well-being - continue the development of recreation and leisure facilities.
- Support cycle and walking tourism initiatives, in tandem with the development of greenways and blueways in the study area.
- This area is predominantly rural and increased tourism may have a negative impact on the population if unmanaged.
- Radon - Radon risk map levels in the study area have been collated from the EPA Radon Risk Map of Ireland.
- Information on the status of drinking water, wastewater and climate change are provided in other sections of this Report.

5.3.3 Land, Soils & Geology

Woodlands provide recreational opportunities in addition to their heritage and economic benefits. They are also important as links in the green infrastructure network. Coillte[15] have provided access to many of their forests and support the use of the forests for recreational uses, and provide access to the following forests in the study area – Barnaslingan Wood, Carrickgollogan, Kilmashogue, Ticknock, Tribadden Wood (Pine Forest), Cruagh Wood, Hell Fire Club, Massy's Estate and Cloon/Curtlestown.

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

According to Geological Survey, Ireland landslide susceptibility mapping, the vast majority of the study area has been rated as having 'High' to 'Moderate' landslide susceptibility, with the risk ranging from to 'Low' and to 'High' across the area. The landslide susceptibility is greater than the national average due to the location of the DEDP area within the Dublin Mountains. There are 53no. previous landslide events in the DEDP area.

5.3.3.1 Existing Land, Soils, Geology & Hydrogeology Issues

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

- Soil - the loss / damage of soil from the construction of greenfield sites for development.

[15] https://www.coillte.ie/our-forests/recreation-map/

- Land Management - conversion of land / sites can release CO_2 into the atmosphere and further reduce areas of 'carbon sinks'.
- Land - management of woodlands for recreational purposes.
- Presence of mountains and corresponding landslide susceptibility.
- Geological Heritage - the protection of sites of geological importance within the study area.

5.3.4 Water Quality (including Flooding)

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

The latest *Water Quality in Ireland* report 2016-2021 was published by the EPA in 2022. The status of the river waterbodies within the study area ranges from '*poor*' to '*high*'. The status of the lake waterbody within the study area is *'poor'*, and the two lake waterbodies within the DEDP area, the Glenasmole Lower (EPA named IE_EA_09_68) and the Glenasmole Upper (EPA named IE_EA_09_70) of *'poor'* and *'good'* quality respectively. There are no canal, coastal or transitional waterbodies within the study area. Groundwater Quality Status between 2016 and 2021 was generally '*good*'[16] across the groundwater bodies within the study area. The groundwater vulnerability of study area ranges from *'low'* to *'extreme'*.

As part of the South Dublin County Development Plan 2022-2028 and Dún Laoghaire-Rathdown County Development Plan 2022-2028, Strategic Flood Risk Assessments (SFRAs) have been prepared.

5.3.4.1 Existing Hydrogeology and Water Quality Issues

The principal threat to water is pollution which can adversely impact on all parts of the water cycle from groundwater to rivers, lakes, estuaries and coastal waters. The Plan must comply with the requirements of the WFD and the Groundwater Directive and aim to drive improvement to water quality in both the short and long-term. Existing water quality issues / pressures with environmental considerations include:

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

[16] EPA Groundwater Quality Data - https://gis.epa.ie/EPAMaps/

sedimentation, groundwater recharge and accidental spillages. There is growing pressures from increasing population and increasing and sometimes conflicting social, economic and recreational uses.

- Anthropogenic pressures from increased tourism, notably water sports including angling.

5.3.5 Air Quality, Noise & Climate

The current trends in air quality in Ireland are reported in the EPA publication '*2022 Annual Report on Air Quality in Ireland*' which is currently the most up to date analysis of air quality data for Ireland. The study area is located within Zone A, within the 'Dublin Conurbation' zone. The designated zones have been defined to meet the criteria for air quality monitoring, assessment and management as defined in the aforementioned regulations. The proposed Plan is unlikely to impact the air quality in Zone A, however there is still a need to protect the air quality near the border of County Wicklow. There are two air quality monitoring station within the study area, Tallaght (Station Code D15) and Knocklyon (Station Code D12).

Air Quality Map show whether air quality is 'good', 'fair', 'poor' or 'very poor' in each region. The current air quality across the study area is *'good'.* Monitoring is done using continuous monitors for ozone and nitrogen oxides in various locations around Ireland. The pollutants of most concern are those whose main source is traffic such as Particulate Matter (PM) and Nitrogen dioxide (NO_2).

The Noise Directive - Environmental Noise Directive (END) 2002/49/EC relating to the assessment and management of environmental noise - is part of an EU strategy setting out to reduce the number of people affected by noise in the longer term and to provide a framework for developing existing community policy on noise reduction from source. During the implementation of the Dublin Mountains DEDP, consideration should be given to protect, where relevant, any designated quiet areas in open country. Baseline noise in the Plan area is mainly sourced from regional roads, there is also some noise overflow from the M50 and railway that spreads into the Plan area.

The recent *Climate Action and Low Carbon Development (Amendment) Act 2021* was established to provide for the approval of plans by the Government in relation to climate change. This aims at pursuing the transition to a climate resilient, biodiversity rich and climate neutral economy by no later than the end of the year 2050. Ireland's *Climate Action Plan 2025* builds on national and sectoral targets by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings in this regard. The purpose of the Climate Action Plan is to lay out a roadmap of actions which will ultimately lead us to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022.[17]

5.3.5.1 Existing Issues

In urban areas, concern has clearly shifted to a range of pollutants associated with road traffic which may be considered relatively new in the context of air quality control. The most important of these pollutants are NO_2, particulate matter less than 10 microns in diameter (PM_{10}), carbon monoxide (CO) and a wide variety of Volatile Organic Compounds (VOCs), including carcinogens such as benzene. Therefore, it is important that a good quality road infrastructure is provided and alternatives to the private car are encouraged as much as possible. At present, much of the Dublin Mountain DEDP is only

[17] Climate Action Plan 2024- https://www.gov.ie/en/publication/79659-climate-action-plan-2024/

accessible via car with public transport and active travel routes limited further away from Dublin's urbanised areas.

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

The potential effects of climate change resulting in an increase in the frequency and severity of weather events, including flooding, storms, heavy snowfall, and variation in temperature. Severe rainfall events, or very cold events with or with snowfall could adversely impact upon town's and people in the Plan area leading to water shortages, residential flooding and disruption to infrastructure and to movement. Therefore, it will be important to improve resilience of existing and planned critical infrastructure, systems and procedures to the effects and variability of climate change.

5.3.6 Material Assets

The latest *Drinking Water Quality in Public Supplies 2023*[18] was published by the EPA in 2024. The report provides a summary of assessment of drinking water quality in public supplies and public group water schemes in Ireland during 2023.

Practical water conservation measures including active leakage detection, demand management and pressure management played and will continue to play a major role in reducing the demand for potable water, thus facilitating additional development and improving the level of service to existing consumers in the study area through the existing watermain networks.

There is one public wastewater treatment plant in the Plan area, Shanganagh-Bray (Reg. CD D0038). Uisce Éireann and County Councils are continually progressing sewer rehabilitation activities, capital maintenance activities, etc, and the Councils will continue to work with Uisce Éireann to monitor the performance of the networks and to advance and realise capital expansions and upgrades of wastewater infrastructure for the continued sustainable growth of the Plan area.

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

The European Commission's Circular Economy Action Plan: A New Circular Economy Action Plan for a Cleaner More Competitive Europe, March 2020, forms one of the main blocks of the European Green Deal. A Waste Action Plan for a Circular Economy[19] was published in 2020 and outlines Ireland's National Waste Policy for 2020-2025.

The '*National Sustainable Mobility Policy Action Plan 2022-2025'* is a national document which seeks to achieve a shift to more sustainable means of transport by setting actions and timeline for Modal

[18] EPA Drinking Water Quality - https://www.epa.ie/publications/compliance--enforcement/drinking-water/annual-drinking-water-reports/
[19] DCCAE (2020).

Change. The area to which the Strategy relates is served by rail, bus, cycle network, regional and strategic roads.

The area to which the Plan relates is served by rail, bus, cycle network, regional and strategic roads. There is existing public transport serving surrounding areas such as Tallaght, Sandyford or Kilternan. However, once in the Dublin Mountains region, connectivity is weak with poor linkages between towns and the principal visitor attractions. It is very difficult for a visitor to tour the region by public transport.

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

5.3.6.1 Existing Material Asset Issues

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

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

- Water Supply and Wastewater Services - increased tourist numbers will generate pressure on existing water and wastewater sources to meet demands. Inadequate infrastructure, including inadequate capacity, contribute to the contamination of receiving surface water and groundwater waterbodies.
- Energy - there is a need to phase out the reliance on fossil fuels, with a shift to renewable energy resources. Identifying and enabling indigenous renewable energy will also support Ireland's energy security. New developments require excellent energy and power services which create direct and indirect emissions, particularly CO_2, methane and dioxins.
- Transport - the movement of people is key to the success of new development and areas, where adequate transport infrastructure (i.e. road, rail, cycle and pedestrian routes) to these developments and accessibility throughout the development / area (safe footpath and cycle paths) is fundamental to development. Sustainable development of active travel routes and local link buses are essential to promote recreation and tourism.
- Waste - increased tourist numbers will pose challenge in providing sustainable recycling infrastructure and will put pressure on the local authorities to provide better waste management and access to waste services.
- Light Pollution - can arise when external lighting is not properly designed or managed which can in turn lead to inappropriate or excessive light spillage.
- Utilities - provide, protect and maintain adequate utilities to support existing and envisaged development.

5.3.7 Cultural Heritage

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

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

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

5.3.7.1 Cultural Heritage Issues

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

Existing cultural heritage issues / pressures include:

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

5.3.8 Landscape & Visual

A National Landscape Strategy for Ireland 2015-2025[20] was published, in line with Ireland's obligations under the European Landscape Convention. The key objectives of this Strategy are the recognition of landscape in law and the provision of a policy framework to put measures in place for the management and protection of landscape, the production of a national Landscape Character Assessment (LCA) through data gathering and an evidence based description of character assessment, raising awareness and public consultation.

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

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

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

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

5.3.8.1 Existing Problems

L Landscape can be considered a dynamic rather than static asset. It is constantly changing, and its changes are driven by nature itself, by direct human intervention, and indirectly through the

[20] National Landscape Strategy: https://www.chg.gov.ie/app/uploads/2015/07/N-Landscape-Strategy-english-Web.pdf

consequences of human activity, notably Climate Change. All physical development undertaken by human impacts on the landscape.

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

Existing landscape and visual issues / pressures include:

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

6 Strategic Environmental Objectives

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

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

SEOs are distinct from the strategic objectives within the Dublin Mountains DEDP, although they often overlap and are developed from international, national and regional policies which generally govern environmental protection objectives. These high-level SEOs are paired with specific targets which can be monitored using indicators (see Section 10 of this Report).

Table 6.1 Strategic Environmental Objectives (SEOs) for the Dublin Mountains DEDP

Theme	SEO Code	Strategic Environmental Objective
Biodiversity (Flora & Fauna) (B)	B_1	Ensure compliance with the Habitats and Birds Directives with regard to the protection of Natura 2000 Sites and Annex habitats and species[21] and no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function.
	B_2	Preserve, protect, maintain and where appropriate enhance the terrestrial, aquatic and soil biodiversity, including internationally, EU and nationally designated sites, habitats and protected species.
	B_3	Ensure the Dublin Mountains DEDP does not contradict biodiversity protection, restoration and rehabilitation objectives in the *South Dublin County Development Plan 2022-2028* and *Dún Laghoaire-Rathdown County Development Plan 2022-2028*.
Population & Human Health (PHH)	PHH_1	Promote sustainable high-quality tourism within the area that supports economic development and maximises potential for employment and investment.
	PHH_2	Improve health and wellbeing by provision of recreational and tourism-related activities.
Land, Soils & Geology (LSG)	LSG_1	Minimise green field development and protect land and soil resources from pollution and degradation.
Water Quality (WQ)	WQ_1	Protect, maintain and where necessary improve water quality and the management of watercourses, groundwater and the marine environment, in compliance with the requirements of the WFD objectives and measures.

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

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

7 Assessment of Alternatives

7.1 Introduction

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

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

7.2 Alternative 1: Do-nothing / Do-Minimum

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

Tourism in the Dublin Mountains will continue to progress under the Dublin Mountains Partnership's Strategic Plan 2022-2026, whose objectives are to provide for recreation, protect the environment and raise awareness of the multiple benefits the Dublin Mountains. The development of the Dublin Mountains will also be guided by the development plans for South Dublin County Development Plan 2022-2028 and Dún Laoghaire-Rathdown County Development Plan 2022-2028.

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

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

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

In essence the Plan would present a five-year sustainable tourism development plan for the Dublin Mountains. The key opportunities to consider for the Plan would be:

- *The Dublin Mountains offer a distinctive combination of outdoor adventure, heritage, nature and dramatic views over the city and coast. Signature assets such as the Dublin Mountains Way, mountain biking experiences and iconic viewpoints provide strong foundations for a differentiated visitor proposition that compliments the wider Dublin experience.*
- *Few capital cities can offer visitors the opportunity to experience a vibrant city, dramatic coastline and mountain landscape within a single destination. The Dublin Mountains provides a distinctive outdoor dimension to this proposition and has the potential to encourage visitors to stay longer, explore more widely and engage with a broader range of experiences across the region.*
- *The proximity of the Dublin Mountains to Dublin City, the Dublin Coast and County Wicklow provides an opportunity to create a connected destination experience. Strengthening the role of visitor*

gateway hubs and improving sustainable transport connections can encourage visitors to explore more widely and stay longer within the region.

- *The area's natural landscapes, the Dublin Mountains Way, mountain biking experiences, heritage and archaeological assets, together with opportunities in food & agritourism, wellness experiences & festivals & events provide a strong platform for the development of memorable visitor experiences.*
- *The Dublin Mountains has strong potential to support a programme of participatory outdoor events centred on walking, trail running, mountain biking, heritage and nature-based activities. Building on existing festivals and outdoor recreation assets can increase destination awareness, extend visitation beyond the peak season, encourage repeat visits and strengthen the local visitor economy.*
- *The Dublin Mountains has an opportunity to increase overnight stays and visitor spend by strengthening the role of visitor gateway hubs and developing distinctive alternative accommodation experiences that reflect the character of the destination. Opportunities also exist to support rural tourism and farm diversification through the development of small-scale outdoor accommodation and agritourism experiences.*
- *A stronger and more connected tourism network can increase the range of visitor experiences available, improve destination competitiveness and maximise the contribution of tourism to local communities. Opportunities exist to support local enterprise development, farm diversification, new tourism experiences and employment opportunities that allow communities to benefit directly from the growth of the visitor economy.*
- *Digital platforms, AI-powered search, online booking systems and social media are increasingly influencing how visitors discover, plan and book travel experiences. The Dublin Mountains has an opportunity to strengthen the competitiveness of tourism businesses, improve the visibility and bookability of visitor experiences, and establish itself as a more connected and discoverable destination. Strengthening destination storytelling, digital capability and online collaboration can help convert existing demand from Dublin visitors into visits, overnight stays and visitor spend.*
- *Creating more accessible trails, viewpoints, interpretation, visitor facilities and digital information can broaden the appeal of the Dublin Mountains and enable a wider range of people to engage with the destination. Improving accessibility supports more inclusive tourism, enhances the visitor experience for all users, and aligns with the ambition to position the Dublin Mountains as a welcoming and sustainable destination. The Digital Audit also identified opportunities to improve website and digital accessibility across a number of tourism businesses, helping visitors more easily discover, plan and book experiences.*
- *The Dublin Mountains Visitor Centre, destination stewardship initiatives and a collective commitment to sustainable tourism provide an opportunity to position the Dublin Mountains as a national exemplar for responsible destination development. The destination has the potential to demonstrate how tourism can support environmental protection while delivering benefits for visitors and communities.*

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

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

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

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

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

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

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

7.4 Assessment of Alternatives

Three reasonable alternatives for the Dublin Mountains DEDP have been identified. The potential effects of the reasonable alternatives on the SEOs categorised as follows:

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

7.5 Reasoning for Selection of the Preferred Alternative

Whilst unlikely to have negative environmental effects, Alternative 1 does not deliver positive benefits for tourism to the Dublin Mountains.

Alternative 2A will deliver effective benefit and response for tourism to the Dublin Mountains, whilst at the same providing for sustainable development and environmental protection.

Alternative 2B will deliver effective benefit and response for tourism to the Dublin Mountains, but without ensuring environmental protection.

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

8 Assessment of Assessment of Effects of the Dublin Mountains Destination & Experience Development Plan

8.1 Introduction

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

South Dublin County Development Plan 2022-2028 and *Dún Laoghaire-Rathdown County Development Plan 2022-2028* together support the delivery of Destination Experience Development Plans through continued collaboration with Fáilte Ireland. It is noted that during its preparation the aforementioned development plans, were subject to full SEA, Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The environmental assessment of the 'Strategic Objectives' and of the 'destination catalyst' and 'destination enabling' initiatives of the Dublin Mountains DEDP are set out separately in the following sections of this Report. The SEA Directive requires the Environmental Report to include information on the likely significant effects on the environment, including on issues such as biodiversity, fauna, flora, population, human health, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.

8.2 Environmental Assessment of the Strategic Objectives of the Dublin Mountains Destination & Experience Development Plan

The finding of the environmental assessment of the overall Vision, Strategic Objectives of the Dublin Mountains DEDP is presented in Table 8.1.

Table 8.1 Environmental Assessment of Strategic Objectives of the Dublin Mountains DEDP

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

Strategic Objectives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required? Yes / No
Vision The vision for the Dublin Mountains DEDP is as follows: *"The Dublin Mountains invite visitors to experience Dublin from above, where spectacular views, rich heritage, signature trails and unforgettable outdoor adventures combine to offer a city break with a difference, revealing a side of Dublin found nowhere else.* *As a distinctive part of Dublin's City, Coast and Mountains proposition, the Dublin Mountains broaden the appeal of the destination, encouraging visitors to stay longer, explore further, connect with nature and discover experiences beyond the traditional city break. Easy access and stronger connections between Dublin City, local communities and the mountains benefit residents and visitors alike, making it easier to experience, access and enjoy more*	This vision statement sets an overall context for destination experience and tourism in the Dublin Mountains area. This will support and underpin the local tourism economy, industry and associated workers. The vision statement encourages the growth of accommodation offerings in the region. The development of new or existing infrastructure presents potential uncertain environmental effects that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure.	**PHH** (PHH_1, PHH_2)		**B** (B_1, B_2, B_3), **LSG** (LSG_1), **WQ** (WQ_1, WQ_2), **ANC** (ANC_1, ANC_2), **MA** (MA_1, MA_2, MA_3), **CH** (CH_1, CH_2), **LV** (LV_1, LV_2)		Yes

Strategic Objectives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required? Yes / No
of the destination, while a growing range of unique accommodation encourages deeper engagement with its landscapes and communities. *Through a shared commitment to stewardship, the natural, cultural and archaeological assets that make the Dublin Mountains unique are protected, celebrated and enhanced for future generations."*						
Strategic Objective 1 – Dublin Mountains Destination Establish the Dublin Mountains as a Leading Outdoor Destination within Dublin's City, Coast and Mountains Proposition	Strategic Objective 1 aims to secure the image of the Dublin Mountains as a key destination for outdoor recreation and tourism. There are no developments proposed in this objective. No negative or uncertain environmental effects arise and therefore, mitigation is not required.	**PHH** (PHH_1, PHH_2)			**B** (B_1, B_2, B_3), **LSG** (LSG_1), **WQ** (WQ_1, WQ_2), **ANC** (ANC_1, ANC_2), **MA** (MA_1, MA_2, MA_3), **CH** (CH_1, CH_2), **LV** (LV_1, LV_2)	**No**
Strategic Objective 2 – Inspiring Dublin Mountains Experiences Develop the Dublin Mountains experience base through product investment that delivers memorable	This objective will improve the visitor experiences available in the Dublin Mountain. There are no developments proposed in this objective. No negative or uncertain	**PHH** (PHH_1, PHH_2)			**B** (B_1, B_2, B_3), **LSG** (LSG_1), **WQ** (WQ_1, WQ_2), **ANC** (ANC_1, ANC_2), **MA** (MA_1, MA_2,	**No**

Strategic Objectives	Potential Environmental Effects	Potential Positive Effects on Environmental Theme & SEO	Potential Negative Effects on Environmental Theme & SEO	Uncertain Effects on Environmental Theme & SEO	No Likely / Neutral Effects on Environmental Theme & SEO	Mitigation Required? Yes / No
outdoor experiences and epic views over the city and coast.	environmental effects arise and therefore, mitigation is not required.				MA_3), **CH** (CH_1, CH_2), **LV** (LV_1, LV_2)	
Strategic Objective 3 – Dublin Mountains Tourism Businesses Support new and existing tourism businesses in the development of experiences that inspire visitors to explore the Dublin Mountains.	This objective will result in positive effects on population and human health, and material assets. However, in the absence of mitigation, both the construction and operation of new experiences could have the potential to result in uncertain environmental effect for biodiversity and Natura 2000 Sites. Increased tourism in these sensitive locations would also require provision of welfare facilities, wastewater and waste management.	**PHH** (PHH_1, PHH_2), **MA** (MA_1, MA_2, MA_3)		**B** (B_1, B_2, B_3), **LSG** (LSG_1), **WQ** (WQ_1, WQ_2), **ANC** (ANC_1, ANC_2), **CH** (CH_1, CH_2), **LV** (LV_1, LV_2)		Yes
Strategic Objective 4 – Dublin Mountains Stewardship & Environment Implement a sustainable tourism development approach that is compatible with the conservation of the Dublin Mountains diverse natural, heritage, archaeological and cultural resources.	This objective will result in positive effects on the population and human health objectives. There are no developments proposed in this objective. No negative or uncertain environmental effects arise and therefore, mitigation is not required.	**PHH** (PHH_1, PHH_2)			**B** (B_1, B_2, B_3), **LSG** (LSG_1), **WQ** (WQ_1, WQ_2), **ANC** (ANC_1, ANC_2), **MA** (MA_1, MA_2, MA_3), **CH** (CH_1, CH_2), **LV** (LV_1, LV_2)	No

8.3 Environmental Assessment of 'Destination Catalyst', 'Supporting Projects' and 'Destination Projects' Initiatives listed within the Dublin Mountains Destination & Experience Development Plan

The Dublin Mountains DEDP includes a list of destination catalysts and supporting projects which will be delivered to support the above strategic objectives of the DEDP. The environmental assessment of the effects of the destination catalysts and supporting projects are detailed in Appendix 1.

There are 19no. destination catalysts initiatives and 22no. supporting projects in total. The projects where there is a requirement for development of existing and new infrastructure might also give rise to uncertain environmental effects on other environmental themes and SEOs that would, if unmitigated, have the potential to arise from both the construction and operation of such developments and/or their ancillary infrastructure. Refer to Table 8.1A in Appendix 1 for the detailed assessment of effects of the catalyst projects, supporting projects and destination projects.

8.4 The Interrelationship between Environmental Factors

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

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

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

Table 8.2 Significant Interrelationships between Environmental Factors

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

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

Legend: Key Interaction ☑ Minor/No Interaction ☒

8.5 Potential Cumulative Effects

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

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

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

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

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

The South Dublin County Development Plan 2022-2028 and Dún Laoghaire-Rathdown County Development Plan 2022-2028 set out policies and objectives for land use, settlement strategy, sustainable development, transport, infrastructure, environmental protection, and management, cultural heritage, climate change, etc. for the counties. Other higher-level international, national and regional plans are integrated within the County Development Plans and have been assessed as such. The Dublin Mountains DEDP will comply with the provisions set within the aforementioned County Development Plans which themselves have been subject to standalone environmental assessment (SEA, NIR, etc.).

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

Table 8.3 Potential Cumulative Effects with other Plans and Programmes

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

Plan, Programme etc.	Potential Cumulative effect	Likely Cumulative Effect
River Basin Management Plan (RBMP) for Ireland 2022-2027	The SEA and AA processes carried out during the preparation of the RBMP have ensured that the potential significant environmental impacts associated with implementation of the Plan have been identified and that these impacts have been given appropriate consideration.	No
County Development Plans (Wicklow County Development Plan 2022-2028, Kildare County Development Plan 2023-2029, Meath County Development Plan 2021-2027, Carlow County Development Plan 2022-2028, Wexford County Development Plan 2022-2028, Dublin City Development Plan 2022-2028, and Fingal Development Plan 2023-2029)	The County Development Plan (CDP) provides the principal planning strategy document for the development of a local authority area over the statutory time period of the plan. Each of the CDP with Zone of Influence of the study area has been subject to SEA and AA processes to ensure that the potential significant environmental impacts associated with implementation of the Plan have been identified and that these impacts have been given appropriate consideration.	No
Regional Tourism Development Strategies 2023-2027 – Failte Ireland's Dublin Destination and Experience Development Plans.	The SEA and AA processes carried out during the preparation of the Strategy have ensured that the potential significant environmental impacts associated with implementation of the Strategy have been identified and that these impacts have been given appropriate consideration.	No

9 Mitigation Measures

9.1 Overview

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

9.2 Mitigation Measures

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

The projects included in this Plan will have to comply, as relevant, with the various provisions of legislation, policies, plans and programmes (including requirements for lower-tier Appropriate Assessment, Environmental Impact Assessment and other licencing requirements as appropriate) that form the statutory decision-making and consent-granting framework, of which this Plan is not part and does not contribute towards. The Plan includes requirements for environmental protection and management including the ones set out in the ***Regional Tourism Development Strategies 2023-2027*** especially the ***Dublin Regional Tourism Development Strategy 2023-2027***. As stated in the Dublin Mountains DEDP these include:

- Infrastructure Management - With respect to infrastructure (including drinking water, wastewater, surface water, waste and transport) consideration must be given to the available capacity and the potential impact on existing infrastructure, as well as the potential environmental effects arising from the provision of new infrastructure and / or from a likely increase in tourism-related pressures. Any such environmental effects will be appropriately mitigated. The promotion of developing visitor friendly infrastructure where it is required is encouraged.
- Visitor Management - Those receiving funding will be requested to manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant effects including loss of habitat and disturbance, including ensuring that new projects are located at a suitable setback from ecological sensitivities.

  As mentioned in the DAU submission, the Dublin Mountains are currently experiencing adverse impacts from high visitor numbers on semi-natural habitats and species. Research by Fáilte Ireland has shown improved environmental outcomes (including improved attainment of conservation objectives) in areas operating appropriate visitor management strategies. Visitor management strategies will be required for proposed plans, programmes and projects that are to receive funding as relevant and appropriate.
- Green Infrastructure and Ecosystem Services - Those receiving funding shall contribute towards the maintenance of existing green infrastructure and its ecosystem services, taking into account the output of the Mapping and Assessment of Ecosystem Services project being undertaken by the NPWS. Proposals for the development of any green infrastructure should demonstrate the synergies that can be achieved with regard to the: provision of open space amenities; sustainable management of water; the enhancement, protection and management of biodiversity; protection of cultural heritage; and protection of landscape sensitivities.

The majority of the mitigation measures are achieved through the detailed environmental protective policies and objectives as set out in the South Dublin County Development Plan 2022-2028 and Dún Laoghaire-Rathdown County Development Plan 2022-2028. The Development Plans provides for sustainable planning and management control of all development in the study area– including the delivery of Destination & Experience Development Plans through continued collaboration with Fáilte Ireland.

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

Therefore, the key environmental protection measures included in the ***South Dublin County Development Plan 2022-2028*** and ***Dún Laoghaire-Rathdown County Development Plan 2022-2028*** provide for appropriate and detailed mitigation of potential uncertain environmental effects of the Dublin Mountains DEDP.

These measures are detailed in the accompanying SEA ER.

10 Monitoring

10.1 Introduction

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

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

Fáilte Ireland is responsible for monitoring and the preparation of monitoring evaluation report(s), the publication of these reports and, if necessary, the carrying out of corrective action. It is recommended that the monitoring for the Dublin Mountains DEDP and review is undertaken in parallel with monitoring and review of the *South Dublin Development Plan 2022-2028* and *Dún Laoghaire-Rathdown Development Plan 2022-2028* efficiency and given that similar data sets will be used to measure the progress of each plan.

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

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

Table 10.1 Environmental Monitoring Programme

SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
Biodiversity (Flora & Fauna) (B)				
B1	Ensure compliance with the Habitats and Birds Directives with regard to the protection of Natura 2000 Sites and Annex habitats and species[22] and no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function.	Conservation status of habitats and species protected under European and International legislation.	Maintenance of favourable conservation status for habitats and species protected under European and International legislation to be unaffected by implementation of the Plan.	Department of Culture, Heritage and the Gaeltacht's National Monitoring Report for the Birds Directive under Article 12 (every 3 years) 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) Irish Wetland Bird Survey (I-WeBS) data. EPA State of the Environment reporting. Input from any other relevant Fáilte Ireland monitoring programmes. Lower tier environmental assessment and decision making by local authorities.
B2	Preserve, protect, maintain and where appropriate enhance the terrestrial, aquatic and soil biodiversity, including internationally, EU and nationally designated sites, habitats and protected species.	Conservation status of habitats and species protected under International and National legislation.	Maintenance of favourable conservation status for all habitats and species protected under International and National legislation to be unaffected by implementation of the Plan.	EPA State of the Environment reporting. Input from any other relevant Fáilte Ireland monitoring programmes.

[22] 'Annexed habitats and species' refer to those listed under Annex I, II & IV of the EU Habitats Directive and Annex I of the EU Birds Directive.

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

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

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

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

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

SEO Ref.	SEO Description	Indicators	Targets	Data Sources and Monitoring Frequency
	and Dún Laoghaire-Rathdown Development Plan 2022-2028.	Number of developments permitted that result in avoidable adverse impacts on High Amenity Zones and Views and Prospects.	protection of High Amenity Zone and Views and Prospects defined in the CDPs. No development supported by the plan should have an adverse impact on High Amenity Zones and Views and Prospects.	Lower tier environmental assessment and decision making by local authorities.

11 References

Council Directive Habitats Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

Environment Director General of the European Commission (2003). *Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment*.

EPA (2026a). *SEA of Local Authority Land Use Plans - EPA Recommendations and Resources.*

EPA (2026b). *SEA Spatial Information Sources Inventory*.

EPA (2024a). *Spatial Information Resources Inventory*.

EPA (2024b). *SEA Pack*.

EPA (2023). *Good Practice Guidance on Strategic Environmental Assessment (SEA) for the Tourism Sector.*

EPA (2020). *Ireland's Environment – An Integrated Assessment*.

EPA (2015). *Strategic Environmental Assessment Resource Manual for Planning Authorities – Integration of SEA Legislation with Procedures for Land Use Plans*.

EPA (2013). *Integrated Biodiversity Impact Assessment – Streamlining AA, SEA and EIA Processes: Practitioner's Manual*.

EPA (2023). *SEA Process Checklist* [Consultation Draft 2024].

EPA (2003). *Development of Strategic Environmental Assessment (SEA) Methodologies for Plans and Programmes in Ireland – Synthesis Report*.

Fossitt, J.A. (2000). *A Guide to Habitats in Ireland*.

European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (S.I. No. 200/2011).

European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. No. 435/2004).

European Parliament and Council Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

European Union (Land Use Planning – Strategic Environmental Assessment) Regulations 2025(S.I. No. 456/2025)

Government of Ireland (2018). *Project Ireland 2040 – National Planning Framework*.

Government of Ireland (2004). *Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment – Guidelines for Regional Authorities and Planning Authorities*.

Inland Fisheries Ireland (2020) *Planning for Watercourses in the Urban Environment.*

Inland Fisheries Ireland (2016) *Guidelines on Protection of Fisheries during construction works in and adjacent to Waters.*

Dún Laoghaire-Rathdown County Council (2022). *Dún Laoghaire-Rathdown Development Plan 2022-2028, including environment reports*

South Dublin County Council (2023). *South Dublin Development Plan 2022-2028, including environment reports*

OPW (2009). *The Planning System and Flood Risk Management – Guidelines for Planning Authorities*.

Planning and Development Act 2000, as amended.

Planning and Development Regulations 2024, as amended.

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