



CONSULTANTS IN ENGINEERING,  
ENVIRONMENTAL SCIENCE &  
PLANNING

# LOCAL AUTHORITY CLIMATE ACTION PLAN

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## Appropriate Assessment Conclusion Statement

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**Prepared for:**  
Kildare County Council



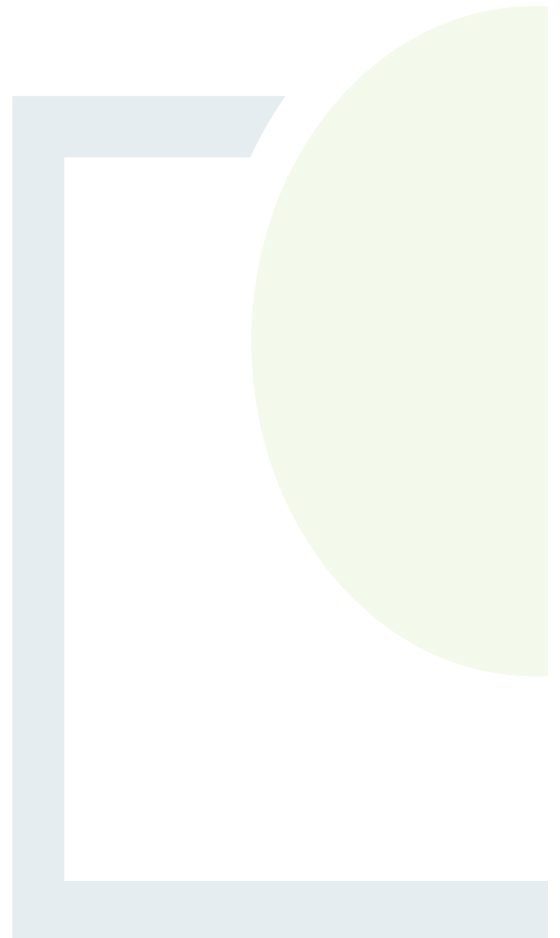
Kildare County Council  
Comhairle Contae Chill Dara

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Core House, Pouladuff Road, Cork, T12 D773, Ireland  
T: +353 21 496 4133 | E: [info@ftco.ie](mailto:info@ftco.ie)

**CORK | DUBLIN | CARLOW**

[www.fehilytimoney.ie](http://www.fehilytimoney.ie)



## APPROPRIATE ASSESSMENT CONCLUSION STATEMENT

### REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

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**Abstract:** Fehily Timoney and Company is pleased to submit this Appropriate Assessment Conclusion Statement for the Kildare Local Authority Climate Action Plan to Kildare County Council for publication alongside the Plan.

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## 1. INTRODUCTION

### 1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Kildare Local Authority Climate Action Plan (LACAP) 2024 - 2029. The obligation to undertake AA derives from Article 6(3) and 6(4) of the Habitats Directive 92/43/EEC as transposed into Irish legislation by the European Communities (Birds and Natural Habitats) Regulations 2011 and the Planning and Development Act 2000, as amended.

AA is a focused and detailed impact assessment of the implications of a strategic action (such as a plan or programme) or project, alone and in combination with other strategic actions and projects, on the integrity of any European Site in view of its conservation objectives.

AA was undertaken for the LACAP. This AA Conclusion Statement documents the AA process applied during the preparation of the LACAP and should be read in conjunction with the LACAP and associated documents including the Natura Impact Report (NIR) for the Plan.

### 1.2 Requirements in relation to AA Conclusion Statements

Guidelines entitled 'Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities' (2009) published by the then named Department of Environment, Heritage and Local Government recommend that plan-making competent authorities 'include a clear and discrete AA Conclusion Statement as a distinct section in the written statement of the plan separate to the SEA statement.' These guidelines recommend that the following information is included in an AA Conclusion Statement:

- Summary of how the findings of the AA were factored into the plan (provided in Section 2 of this document);
- Reasons for choosing the plan as adopted, in the light of other reasonable alternatives considered as part of the AA process (provided in Section 3 of this document); and,
- A declaration that the plan as adopted will not have an adverse effect on the integrity of a Natura 2000 site or sites (provided in Section 4 of this document).
- Copy of NIR (the NIR was published alongside the AA Conclusion Statement and is available for review).<sup>1</sup>

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<sup>1</sup> This NIR provides the following information:

- Sufficient detail of the LACAP to make clear its size, scale and objectives.
- A description of baseline conditions, conservation objectives, and relevant ecological and environmental issues in relation to relevant European sites that be affected by plan implementation (in the absence of mitigation).
- Potential adverse impacts of the Plan on the relevant European sites.
- How those environmental effects will be avoided and prevented through mitigation.



## 2. HOW THE FINDINGS OF THE AA WERE INTEGRATED INTO THE LACAP

### 2.1 Integrated Biodiversity Assessment Approach

The environmental assessment for the Plan undertaken was carried out in accordance with an Integrated Biodiversity Impact Assessment based methodology in accordance with EPA's guidance document entitled '*Final Report: Integrated Biodiversity Impact Assessment, Streamlining AA, SEA and EIA Processes. Best Practice Guidance.*' (2012).

The methodology employed facilitated the integration of SEA and AA processes relating to biodiversity impact assessment to ensure the effective and streamlined assessment of biodiversity impacts. The plan-making, SEA and AA processes - including scoping, baseline evaluation, impact assessment and mitigation/monitoring measure development processes - were carried out concurrently to facilitate holistic and complete assessment of biodiversity impacts. The effective communication and integration of scientific knowledge and analysis between assessments took place. The SEA was suitably informed by the analysis and conclusions in AA.

### 2.2 Mitigation through integration of environmental considerations into the LACAP

The plan making process was carried out in parallel with the SEA and AA processes. Regular communication and interaction took place between the environmental assessment team and the plan making team. Environmental considerations that came to light during the SEA and AA processes, including consultation processes, were regularly communicated to the plan making team during the plan making process. As necessary, environmental mitigation measures to ameliorate the potential negative environmental effects of implementing the LACAP were developed and then integrated into the LACAP. Much of the environmental mitigation was embedded in the plan early on in the process as a result of this. This process was carried out in an iterative manner to ensure optimal plan making and environmental outcomes. Environmental considerations were also integrated into the plan so as to facilitate maximizing identified positive environmental effects of the LACAP.

Mitigation measures were suggested that maximize the co-benefits of climate action for other environmental components such local air quality, human health, biodiversity, water quality and other interrelated areas (i.e., win-win solutions).

Additional text clarifying environmental protection related obligations and environmental enhancement opportunities has been attached to a variety of defined actions in the plan. This text has been shaped to ensure that environmental considerations are appropriately taken into account during plan implementation. This text has also been shaped to ensure plan implementation generates the minimum level of negative environmental effects and the maximum level of positive environmental effects. These text additions are presented in Table 2-1.

Several environmental governance principles were established to ensure plan implementation generates the minimum level of negative environmental effects and the maximum level of positive environmental effects. These environmental governance principles shall underpin and guide plan implementation and shall apply to and be integrated into all actions/activities which result due to the implementation of the plan. These principles are defined in Table 2-2. The principles were incorporated into the plan itself.

These environmental mitigation measures were integrated into the LACAP and will prevent negative effects and maximize positive effects associated with the LACAP.



The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the European sites have been addressed by the inclusion of these mitigation measures

**Table 2-1: Proposed Environmental Mitigation Measures - Additional text included in Plan actions relating to environmental protection related obligations and environmental enhancement opportunities**

Draft LACAP Action Reference <sup>2</sup>	LACAP Action	Mitigation Measure
1.10	Prepare and apply a protocol to enable and require a pre-set standard for 'Climate Proofing' including energy efficient, accessible and water sensitive urban design of all local authority led capital plans, purchases and investment for example; projects funded under the Outdoor Recreation Scheme, Active Travel Scheme, Urban Regeneration and Development Fund etc.	Attach the following text to the action: ensuring the protocol has appropriate regard to environmental protection requirements, environmental sensitivities such as European Sites, biodiversity and opportunities for promoting climate action co-benefits.
1.11	Update the Kildare County Council Major Emergency Plan to ensure that all climate change risks to the human, natural and built environment (including heritage) are suitably addressed and a resilient response is available.	Attach the following text to the action: having due regard to environmental sensitivities such as European Sites and biodiversity.
2.2	Promote the Midlands Retrofit Programme to ensure that existing council-owned houses are retrofitted to a minimum Building Energy Rating of B2 (or to a cost-optimal level).	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, protected species associated with such buildings, European sites and biodiversity; and the need to appropriately protect and conserve protected structures, during any retrofitting works.
2.3	Promote the National Retrofitting Scheme to private householders to highlight the package of supports to make it easier and more affordable for homeowners to undertake home energy upgrades.	Attach the following text to the action: whilst advocating and exerting influence to ensure due regard is had to environmental sensitivities such as local human receptors, protected species associated with such buildings, European sites and biodiversity; and the need to appropriately protect and conserve protected structures, during any retrofitting works.
2.4	Communicate details of case studies and guidance on the upgrade of traditional building to promote as exemplar.	Attach the following text to the action: ensuring appropriate guidance is provided on the protection of architectural and heritage value and protected species associated with such buildings during upgrade works.
2.5	Develop projects to promote adaptive reuse of historic structures - using exemplar retrofitting projects and carbon budgets to demonstrate climate value and publish relevant case studies.	Attach the following text to the action: having appropriate regard to the need to protect and conserve the architectural or cultural heritage value that may be associated with such buildings, and protected species that may be present in such buildings.

<sup>2</sup> For clarity, this reference was the reference assigned to the Action in a draft version of the LACAP which was published during prescribed consultation.



Draft LACAP Action Reference <sup>2</sup>	LACAP Action	Mitigation Measure
2.6	Build climate resilience and improve energy performance of architectural and archaeological heritage in public and private ownership through schemes such as the Built Heritage Investment Scheme, Historic Structure Fund, Historic Towns Initiative, Irish Walled Towns Network and Community Monuments Fund.	Attach the following text to the action:  having appropriate regard to the need to protect and conserve the architectural or cultural heritage value that may be associated with such buildings, and protected species that may be present in such buildings.
2.7	Prepare and implement a programme of measures for Council Buildings/Facilities to assist in achieving a 51% reduction in non-electrical related greenhouse gas (GHG) emissions by 2030 and to improve adaptation to climate change. This will be assisted by Building Information Modelling (BIM) and adhere to the Capital Works Management Framework (CWMF) requirements.	Attach the following text to the action:  Prepare and implement a programme of measures for Council Buildings/Facilities to assist in achieving a 51% reduction in non-electrical related greenhouse gas (GHG) emissions by 2030 and to improve adaptation to climate change; having due regard to environmental sensitivities such as local human receptors, protected species that may be present in such buildings, European sites and biodiversity, and the need to appropriately protect and conserve protected structures. This will be assisted by Building Information Modelling (BIM) and adhere to the Capital Works Management Framework (CWMF) requirements.
2.10	Ensure all developments including car parks are designed in such a manner as to support EV charging, promote carbon sequestration, green infrastructure, and nature-based surface water drainage solutions. Work with relevant bodies to identify optimum locations and provide suitable EV charging points for Public Transport Vehicles in town centres and key points on inter rural bus routes.	Attach the following text to the action:  Advocate and exert influence and control, as appropriate, to ensure such development promotes climate action co-benefits and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.
2.12	Identify roads and streets within the County that are suitable for road space reallocation. Prioritise roads and streets currently or likely to be used by public potential town bus services. Work towards ensuring network options are developed between active travel options and public transport routes.	Attach the following text to the action:  Identify roads and streets within the County that are suitable for road space reallocation, having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage. Prioritise roads and streets currently or likely to be used by public potential town bus services. Work towards ensuring network options are developed between active travel options and public transport routes.
2.13	National Sustainable Mobility Policy to increase provision of park and ride/share at transport interchanges and community hubs and support the development of Town Bus Services and park and ride/share locations to maximise connectivity for the highest number of residents.	Attach the following text to the action:  Ensure such development promotes climate action co-benefits, including SuDS and nature based solutions, and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.
2.15	Develop and publish a cycle network plan [LK3] for the County. Where possible, ensure the cycle network is planned on the principle of 'origin and destination' that prioritises connectivity to places of education, employment and public. Develop secure bike / mobility parking options that aligns to route options and trip attractor locations.	Attach the following text to the action:  Ensure the cycle network is planned in a manner that has due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.





Draft LACAP Action Reference <sup>2</sup>	LACAP Action	Mitigation Measure
2.16	Expand the greenway network in the County establishing linkages with towns and villages in line with the strategic national cycle network and avoid locating greenways in sensitive natural/biodiversity areas.	Attach the following text to the action: Ensure greenway infrastructure is planned and developed in a manner that has due regard to environmental sensitivities such as the receiving water environment, local air quality, biodiversity, European sites and cultural heritage.
2.18	Deliver the Pathfinder Projects identified for County Kildare under the National Sustainable Mobility Policy such as the Naas Mobility Network Integration and Energy Performance and Building Directive initiatives.	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity; and the need to appropriately protect and conserve protected structures, during any retrofitting works.
2.21	Develop an Electric Vehicle Network Plan to identify charging points including high powered charging hubs across the County.	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, and cultural heritage.
2.22	Promote and implement the Safe Routes to School Programme to create safer walking and cycling routes within communities, alleviate congestion at the school gates and increase the number of students who walk or cycle to school by providing safe infrastructure.	Attach the following text to the action: Ensure supported active travel development is carried out in a manner that has due regard to environmental sensitivities such as local human receptors, Biodiversity, European sites, water quality and hydrology, existing traffic and transport conditions and amenity value.
2.24	Establish a comprehensive and integrated network of remote working hubs throughout the County to support remote working and reduce commuter travel in line with the National Remote Work Strategy and Kildare Hub Strategy.	Attach the following text to the action: ensuring such hubs are located and planned in a manner that does not cause unintended, negative local traffic and transport related impacts.
3.1	Develop Green Infrastructure Plan (as defined by the EU as 'A strategically planned network of natural and semi-natural areas with other environmental features, designed and managed to deliver a wide range of ecosystem services, while also enhancing biodiversity') including a green infrastructure network for the County that incorporates climate change mitigation and adaptation to increase climate resilience.	Attach the following text to the action: climate action co-benefits and environmental protection requirements.
3.3	Introduce and implement a policy in relation to how Council owned spaces are managed to improve biodiversity and water quality levels in keeping with the 'All Ireland Pollinator Plan' and as part of this to develop and implement pesticide reduction policy for lands and areas managed by the Council.	Attach the following text to the action: ensuring these substances are only used to a degree that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.
3.4	Prepare a guidance document and training on the importance of, quality rating and sustainable management of the hedgerows and riparian areas, for Council staff and external stakeholders including farmers/landowners.	Attach the following text to the action: having due regard to hedgerow and riparian area conservation requirements and the need to avoid habitat fragmentation.



Draft LACAP Action Reference <sup>2</sup>	LACAP Action	Mitigation Measure
3.6	Commission the 'Local Authority County Wetland Survey', develop a Wetland Restoration Plan, this shall identify priority areas for habitat restoration, carbon capture and water and biodiversity benefits, along with phasing for restoration.	Attach the following text to the action:  This plan shall be developed by a competent ecology team, and shall have due regard to the need to appropriately protect, conserve and enhance important habitats and species and European sites, and support the maintenance and improvement of water quality in line with the aims of the Water Framework Directive.
3.7	The Council will seek to prioritise the delivery of Catchment Flood Risk Assessment and Management Programme identified flood schemes in the county and promote nature-based solutions and integral to these schemes.	Attach the following text to the action:  having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
3.8	Develop integrated programme to address Invasive Alien Species.	Attach the following text to the action:  This programme shall be developed by a competent ecology team, and shall have due regard to the need to appropriately manage and prevent the spread of invasive species.
3.9	Develop a plan of action to protect, conserve and enhance the wetlands identified in the County Kildare Wetland Survey 2012-2014.	Attach the following text to the action:  This plan shall be developed by a competent ecology team, and shall have due regard to the need to appropriately protect, conserve and enhance important habitats and species and European sites, and support the maintenance and improvement of water quality in line with the aims of the Water Framework Directive.
3.10	Prepare guidance document and training on quality rating and management prescription of hedgerows in open space for Council staff and developers.	Attach the following text to the action:  having due regard to hedgerow and riparian area conservation requirements and the need to avoid habitat fragmentation.
3.14	Devise a county tree management plan which seeks to retain existing trees, support the planting of trees and identify sites for large scale native and mixed woodland planting. Set targets to maintain existing and plant new native trees in urban and rural areas, to enhance carbon storage, biodiversity and landscape, air quality, and urban heat island mitigation. Increase range of edible native provenance locally sourced fruits, flowers and vegetables in Council Parks, rooftops and open spaces.	Attach the following text to the action:  Devise a county native tree management plan which seeks to retain existing native trees, support the planting of native trees and identify sites for large scale native and mixed woodland planting. Set targets to maintain existing and plant new native trees in urban and rural areas, to enhance carbon storage, biodiversity and landscape, air quality, and urban heat island mitigation. Increase range of edible native provenance locally sourced fruits, flowers and vegetables in Council Parks, rooftops and open spaces.
3.15	Deliver the enhanced rehabilitation of former industrial peatlands within the County in line with Irelands National Recovery and Resilience Plan.	Attach the following text to the action:  whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.



Draft LACAP Action Reference <sup>2</sup>	LACAP Action	Mitigation Measure
3.16	Engage with Bord na Móna to explore the appropriate and sensitive diversification of former cutaway peatlands and development of alternative uses such as rewetting and recreational facilities under the brown to green agenda under the National Strategy on Outdoor Recreation.	Attach the following text to the action:  whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
3.17	Engage with Bord na Móna to develop a Green Infrastructure Masterplan to inform the delineation of core areas, steppingstones and corridors to support the development of the Bog of Allen Nature Reserve, Special Amenity Area Order and/or National Peatlands Park.	Attach the following text to the action:  whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
3.22	Provide technical supports to farming enterprises in the development of biomethane from Anaerobic Digestion.	Attach the following text to the action:  including guidance on planning and environmental protection requirements.
3.24	Develop pesticide use policy for the City or County Council.	Attach the following text to the action:  ensuring these substances are only used to a degree that does not cause significant effects on the receiving environment, such as the receiving water environment, biodiversity or European sites.
4.8	Ensure the continued incorporation of Flood Risk Management and Climate Change Sectoral Adaptation Plans into the spatial planning of the County to meet the requirements of the EU Floods Directive and the EU Water Framework Directive and to promote a climate resilient County.	Attach the following text to the action:  having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
4.9	Implement all Area Specific Recommendations presented in the Strategic Flood Risk Assessment for the Kildare County Development Plan 2023-2029.	Attach the following text to the action:  having due regard to the need to promote nature based solutions and Sustainable Drainage Systems, and environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
4.12	Resolve local flooding issues utilising OPW and Department of Transport funding (Drainage programme, Climate Adaptation and Resilience Works, OPW Minor Works Scheme) incorporating Sustainable Urban Drainage Systems.	Attach the following text to the action:  having due regard to the need to promote Sustainable Drainage Systems, and environmental sensitivities at these locations, including water quality, biodiversity, European sites, riparian corridors and aquatic ecology, visual amenity and recreation and amenity value.
4.13	Support and inform a climate proofing programme for natural water resources, and to better manage flooding at the catchment level, the Council will identify a sub-catchment where water quality objectives are not being met, and where there is an established flood risk.	Reword to the following:  Support and inform a climate proofing programme for natural water resources. To better manage flooding at the catchment level, the Council will identify a sub-catchment where water quality objectives are not being met, and where there is an established flood risk.



Draft LACAP Action Reference <sup>2</sup>	LACAP Action	Mitigation Measure
4.14	To carry out a feasibility assessment to determine if it is possible to identify waterbodies that are both particularly vulnerable to extreme water events associated with climate change, and at risk of not meeting the requirements of the EU Water Framework Directive.	Attach the following text to the action: Depending on the outcome of the assessment, implement any protective and remediation measures for waterbodies that may be identified.
4.18	Implement the Local Just Transition Plan for West Kildare to support and advance sustainable social, economic, and environmental development in the transition to a low carbon future in the West Kildare region.	Attach the following text to the action: having due regard to environmental sensitivities in the area such as European Sites, noise, landscape and visual amenity, cultural heritage and biodiversity related sensitivities.
4.19	Support the programme for a free energy report for householders in the Just Transition area to provide advice on options for retrofit and free support for accessing grants such as the 'better energy communities' and 'national retrofit' grants.	Attach the following text to the action: whilst advocating and exerting influence to ensure appropriate regard is had to the need to protect and conserve biodiversity, air and water quality, European Sites, and protected structures during retrofitting.
4.20	Support Just Transition projects with a climate focus, such as the Midlands Bioenergy Development Project within the County.	Attach the following text to the action: whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
4.22	Explore the creation of local authority apprenticeship programme in use of traditional materials and skills to assist in carrying out conservation of traditional structures to increase their climate resilience and raise awareness of the importance of traditional skills and materials.	Attach the following text to the action: whilst incorporating appropriate training to mitigate against any environmental and biodiversity impacts that may arise on sites.
5.1	Prepare and implement an overall Renewable Energy Strategy for the County that is informed by the national Renewable Electricity Spatial Policy Framework to support sustainable development of onshore wind and solar within the County.	Attach the following text to the action: whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
5.2	Implement the Kildare County Council Wind Energy Strategy.	Attach the following text to the action: whilst advocating and exerting influence to ensure such projects promote climate action co-benefits and do not contravene relevant environmental protection criteria or cause significant negative environmental effects.
5.3	Support local community-based renewable energy projects and new micro-generation and small-scale generation renewable energy projects.	Attach the following text to the action: where it is confirmed through appropriate environmental assessment that associated renewable energy development will not have any significant environmental effect.
5.4	Support ongoing expansion and improvements to the electricity grid infrastructure within the County to support renewable generation and supply.	Attach the following text to the action: having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, water and air quality.



Draft LACAP Action Reference <sup>2</sup>	LACAP Action	Mitigation Measure
5.6	Undertake a feasibility study on integrating solar photovoltaic at Kildare County Council owned car parks and on the roof tops of publicly owned buildings throughout the County.	Attach the following text to the action: ensuring the study has appropriate regard to planning and environmental considerations. If considered feasible, the project should have appropriate regard to relevant planning and environmental protection criteria.
5.7	Support Bord na Móna with the redevelopment of the headquarters at Newbridge with a view to promoting the area as a Green Energy Hub.	Attach the following text to the action: having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, water and air quality.
5.8	Require data centres to include strong energy efficiency measures (including demand management, energy efficiency or auto generation) to reduce operational carbon footprints through the use of sustainable sources of energy generation in the first instance and then the use of renewable sources of energy to power operations.	Attach the following text to the action: where it is confirmed through appropriate environmental assessment that associated renewable energy development will not have any significant environmental effect.
5.9	As part of the operational maintenance of all public lighting in the County, Kildare County Council shall develop and implement the phased introduction of energy-efficient lighting systems on all public lighting while having due regard for the impact on protected species such as bats.	Reword to the following: As part of the operational maintenance of all public lighting in the County, Kildare County Council shall develop and implement the phased introduction of energy-efficient lighting systems on all public lighting while having due regard for the impact the spectrum of light used will have on nocturnal species such as bats.
5.11	Implement a wider roll out of segregated brown bin collection systems across the County to capture this resource for treatment in Anaerobic Digestion plants for recovery of biomethane in line with the National Waste Management Plan for a Circular Economy.	Attach the following text to the action: whilst having due regard to environmental sensitivities such as European sites, biodiversity and amenity value, water and air quality.
5.12	Support the circular initiatives such as prevention, reuse, repair and recycling of resources to minimise waste treatment at waste to energy plants or landfills. Undertake a feasibility study to create a 'Bring/Take' centre within a key hub in the County.	Attach the following text to the action: ensuring the study has appropriate regard to planning, waste management and environmental requirements, considerations and constraints.
<b>Maynooth DZ</b>		
1.7	Collaborate with Maynooth University to align climate action initiatives within the town.	Attach the following text to the action: having due regard to opportunities to promote climate action co-benefits and environmental protection requirements.
2.3	Engage with educational premises to promote the Climate Action Fund to provide photovoltaic panels (up to 6kW output) in all schools.	Attach the following text to the action: where it is confirmed through a glint and glare assessment that such solar development will not have any potential glint and glare impact on sensitive receptors, or otherwise, where it is confirmed that such solar development constitutes exempted development under the Planning and Development Regulations by virtue of its size or location outside a Solar Safeguarding Zone, and having due regard to all other environmental sensitivities that could be impacted by such development.



Draft LACAP Action Reference <sup>2</sup>	LACAP Action	Mitigation Measure
2.4	Deliver the retrofit of all social housing in the town to achieve a Building Energy Rating B2.	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
2.5	Promote retrofit to Building Energy Rating B2 or Nearly Zero Energy Buildings for private properties in the commercial and community sector.	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
2.6	Support Maynooth University in the introduction of new-zero energy student accommodation within walking/cycling distance of the campus.	Attach the following text to the action: having due regard to environmental sensitivities such as local human receptors, European sites and biodiversity, and the need to appropriately protect and conserve protected structures in accordance with relevant protected structures regulations.
2.7	Support remote working through the development of office hubs and co-working spaces in Maynooth to aid in reduced daily commuter travel outside the town.	Attach the following text to the action: ensuring such hubs are located and planned in a manner that does not cause unintended, negative local traffic and transport related impacts.
2.8	Prioritise transport policy in Maynooth to support safe active travel (pedestrians and cyclists) and public transport and to discourage private car use within the town (e.g., through car parking charges or car free days).	Attach the following text to the action: ensuring policy has appropriate regard to all planning and environmental protection requirements, including the need to protect biodiversity, flora, fauna, important habitats and European sites.
2.9	Promote active travel initiatives in the town to enable greater uptake of walking and cycling with a focus on strategic hubs such as the train station, the university and the town centre. Link with 2.10	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, cultural heritage.
2.10	Enable enhanced access to Maynooth train station, such as through improved footpaths, safe cycle lanes, local bus services, Park and Ride, etc., to maximise the modal shift potential of the local rail network.	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, cultural heritage.
2.11	Engage with bus companies to enhance the local bus services through delivery of an appropriately designated bus terminal in the town as well as associated infrastructure for improved bus services both in the town for linkages to other urban centres.	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving water environment, biodiversity, European sites local air quality, cultural heritage.
2.12	Support the development of electric vehicle charging points at strategic points in the town and supercharge points and incentives for electric vehicle users.	Attach the following text to the action: having due regard to ensuring disabled access to EV charging, and environmental sensitivities such as the receiving water environment, biodiversity, European sites, local air quality, cultural heritage.



Draft LACAP Action Reference <sup>2</sup>	LACAP Action	Mitigation Measure
2.14	Undertake a feasibility study to assess the potential for a Park and Ride facility outside of the town centre that would support the reduction of road traffic volumes through the town centre and promote active travel or public transport options as an alternative.	Attach the following text to the action: Ensure such development promotes climate action co-benefits, including SuDS and nature based solutions, and does not contravene relevant environmental protection criteria or cause significant negative environmental effects.
3.2	Support green infrastructure projects such as those providing linkages to open spaces for biodiversity such as the Carton Avenue Masterplan, the Harbour Field Improvement Works, the Lyreen River, the Rye River, the Royal Canal Greenway or via the Outer Orbital Route.	Attach the following text to the action: having due regard to environmental sensitivities such as archaeology, European sites, biodiversity and amenity value, and the potential to enhance ecological connectivity.
3.5	Develop a landscaping plan for the town to enable the Council, citizens and businesses to coordinate the enhancement of biodiversity and any future native planting in the town.	Attach the following text to the action: Develop a landscaping plan for the town to enable the Council, citizens and businesses to coordinate the enhancement of biodiversity, ecological connectivity and any future native planting in the town.
3.6	Support carbon sequestration through strategic planting of native species for all new developments, underutilised lands or farms to promote biodiversity gain within Maynooth.	Attach the following text to the action: Support carbon sequestration through strategic planting of native species for all new developments, underutilised lands or farms to promote biodiversity gain and ecological connectivity within Maynooth.
3.7	Enhance green infrastructure in the town to support the development of sustainable urban drainage systems/swales/rain gardens to improve climate resilience.	Attach the following text to the action: Ensure all SuDS related construction works are designed and implemented in a manner that does not result in the occurrence of significant adverse environmental effects and does not result in adverse effects to European sites and biodiversity.
5.1	Enable the replacement of fossil fuel through supports for the development of micro-generation, small-scale and community-owned renewable generation within Maynooth.	Attach the following text to the action: where it is confirmed through appropriate environmental assessment that associated renewable energy development will not have any significant environmental effect.
5.2	Liaise with ESB Networks to ensure prioritisation of the upgrade of the Maynooth electricity grid network to enable the required renewable energy generation capacity in the town.	Attach the following text to the action: having due regard to environmental sensitivities such as the receiving noise, soils and water environment, biodiversity, European sites, local air quality, cultural heritage
5.3	Undertake a feasibility study of the potential for district heating or energy in Maynooth.	Attach the following text to the action: ensuring such a report as appropriate regard to planning and environmental protection considerations.
5.4	Upgrade all public lighting in Maynooth to energy-efficient light-emitting diode (LED) lights or equivalent.	Attach the following text to the action: while ensuring the lumen levels and spectral range are maintained or reduced/controlled to avoid effects to biodiversity.



Draft LACAP Action Reference <sup>2</sup>	LACAP Action	Mitigation Measure
5.6	Promote the concept of a sharing, reuse and repair society including waste resource exchanges for key products (tools, toys, etc).	Attach the following text to the action: ensuring all reuse and repair promotion activities are carried out in accordance with good waste management practices; and accord with, or support the public's accordance with the provisions of the Waste Management Act.
5.8	Support the development of sustainable and circular infrastructure to manage organic wastes such as anaerobic digestion or composting in the town.	Support the development of sustainable and circular infrastructure to manage organic wastes such as anaerobic digestion or composting at an appropriate location in the vicinity of the town; whilst ensuring: 1. Appropriate regard is given to planning and environmental protection constraints and considerations during the development planning process; 2. Such development does not cause unintended, significant, negative environmental effects in the area; and, 3. Such facilities operate in accordance with the provisions of the Waste Management Act.

**Table 2-2: Proposed Environmental Mitigation Measures - Environmental Governance Principles included in the plan**

Promote climate action projects that support and maximize environmental co-benefits, such as biodiversity protection and enhancement; improved air, water or soil quality; or enhanced recreation, amenity and cultural heritage value, to ensure win-win benefits are gained.
Support or facilitate climate action related projects and initiatives which seek to make improvements in soil structure, management and health by increasing soil organic carbon - which will create the environmental co-benefits of improving flood resilience by enhancing water holding capacity of soils and increasing the level of GHG sequestration associated with land use functions.
Ensure all development underpinned or supported by climate action is planned and implemented in a manner that appropriately considers the potential for environmental co-benefits, potential environmental impacts and environmental protection requirements. No climate action related development project that is likely to have significant negative effects on the receiving environment shall be supported.
Flood projects, or related maintenance works, shall be carried out in a manner that promotes climate action-biodiversity related co-benefits, and shall have due regard for the protection and enhancement of rare, protected or important habitats and species.
Ensure climate action related projects are carried out in a manner that promotes climate action-cultural heritage co-benefits, and do not result in unauthorized physical damage to cultural, archaeological or architectural features, or unauthorized or inappropriate alteration of the context of sensitive cultural heritage features.
Ensure climate action related projects are carried out in a manner that promotes climate action water quality co-benefits, and align with the provisions of the Water Framework Directive and relevant River Basin Management Plan.
Promote climate action projects that support protected trees, hedgerows and other habitats such as wetlands, flood zones which contribute to green infrastructure.
Support opportunities to improve ecological connectivity of non-designated habitats and sites to improve overall ecosystem resilience and functioning while supporting climate action within the county.
Ensure all projects supported by the council have taken the necessary precautions to identify and manage invasives species, particularly with regard to Schedule III species. No climate action related development project that is likely to cause the spread of invasives species listed in Schedule III shall be supported.
Support opportunities to support peatland restoration, rehabilitation and maintenance while achieving climate targets through the implementation of the climate actions within the plan.





## 3. CONSIDERATION OF ALTERNATIVES

### 3.1 Introduction

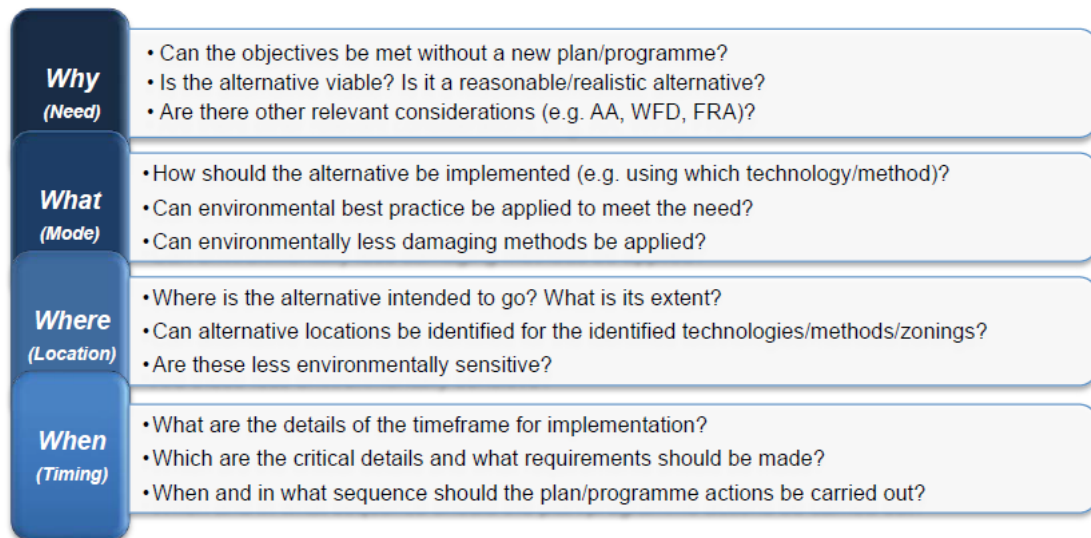
This section provides an overview of reasonable Plan alternatives considered during the plan-making processes. The environmental effects of reasonable alternative, including effects on biodiversity and European sites, were considered when choosing the preferred Plan.

### 3.2 Approach to Developing Reasonable Alternatives

A range of alternatives to the LACAP were considered during the plan-making process. The approach for identifying reasonable alternatives to the LACAP is defined below:

1. Iterative communication was held between the plan-making and environmental assessment teams to identify the various alternative approaches and options being considered to achieve the vision of the plan - the reduction of GHG emissions at Local Authority organizational level and within the Community in support of Climate Action policy. This communication commenced early on during the plan-making process.
2. Reasonable alternatives considered were identified. For an alternative to be considered reasonable, it must be practical/functional, realistic and implementable. An evaluation of whether each alternative was practical/functional, reasonable and implementable took place. This evaluation considered the following factors:
  3. The vision of high-level objectives of the LACAP.
  4. The geographic scope of the LACAP.
  5. The actual powers and functions of the Local Authority.
  6. The climate action merits of the alternative.
  7. The genuine ability of the alternative to achieve the plan vision and high-level objectives.
  8. The technical feasibility of the alternative.
  9. The availability of resources, including financial resources to deliver the plan within the required timeframe.
  10. The policy hierarchy and the parameters placed around the LACAP by higher-level policy.
  11. The legislative context and the parameters placed around the DLACAP by climate action and environmental related legislation.

The toolkit contained in the EPA's guidelines entitled 'Developing and Assessing Alternatives in Strategic Environmental Assessment Good Practice Guidance' (2015) was utilized when identifying reasonable alternatives. The 'Why? What? Where? When?' Model defined in the guidelines were used when framing reasonable alternatives, as shown in Figure 3-1.



**Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives - Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).**

### 3.3 Identification and Description of Reasonable Alternatives

Reasonable alternatives to the LACAP were identified. A description of these reasonable alternatives and the reasons for selecting these reasonable alternatives are presented in Table 3-1.

A 'Do Nothing' or 'Do Minimum' alternative was not a reasonable alternative in this instance as the preparation of an effective LACAP is a statutory requirement under Section 16 of the Climate Act.



**Table 3-1: Reasonable Alternatives to the LACAP**

Reasonable Alternative	Description of Reasonable Alternative	Reasoning for selecting this Reasonable Alternative
<p>Alternative 1 - The Pareto Approach: Prioritize reducing GHG emissions from largest GHG emitting sectors to mitigate against climate change impacts.</p>	<p>This alternative involved developing a LACAP that primarily focusses on climate mitigation and reducing GHG emissions associated with the largest GHG emitting sectors in the County that a local authority can reasonable influence having regard to the functions of a local authority - the Residential and Transport sectors.</p>	<p>This was a viable alternative that could achieve a significant reduction in GHG emissions by prioritizing and supporting climate mitigation related action for the Residential and Transport sectors. This alternative would be relevant to the county of Kildare. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).</p>
<p>Alternative 2 - The Holistic Approach: Adopt a multi-pronged approach and focus on a range of priority areas to mitigate against and adapt to climate change impacts.</p>	<p>This alternative involved developing a LACAP that has a balanced focus on both climate mitigation and adaptation across several theme areas and all socio-economic sectors.</p>	<p>This was a viable alternative that would have enhanced potential to reduce GHG emissions across multiple sectors, potential to offset GHG emissions, and greater potential to protect the local community and the environment from climate change related risks. Climate mitigation and adaptation actions across a wide breath of theme areas would be supported by the LACAP. This alternative would be relevant to the county of Kildare. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).</p>
<p>Alternative 3 - The Holistic and Participatory Approach (Current LACAP): Adopt a multi-pronged approach - that has a strong community engagement emphasis - and focus on a range of priority areas to mitigate against and adapt to climate change impacts.</p>	<p>This alternative involved developing a LACAP that has a balanced focus on both climate mitigation and adaptation across several theme areas and all socio-economic sectors, and which has a strong community engagement emphasis, which underpins, supports and drives the climate action contained in the plan.</p>	<p>This was a viable alternative that would have enhanced potential to reduce GHG emissions across multiple sectors, potential to offset GHG emissions, and greater potential to protect the local community and the environment from climate change related risks. Climate mitigation and adaptation actions across a wide breath of theme areas would be supported by the LACAP. The range of climate mitigation and adaptation actions defined in the LACAP is likely to have better community level and organizational support given its strong community engagement emphasis. This alternative would be relevant to the county of Kildare. The alternative would cover the period from 2024 to 2029 (the duration of the prospective LACAP).</p>



### 3.4 Evaluation of Reasonable Alternatives and Reasons for Choosing the Preferred Plan

An evaluation of the potential effects of the reasonable alternatives on the baseline environment was carried out in accordance with the SEA Directive and best practice guidelines. This evaluation is documented in the SEA Environmental Report for the LACAP. A summary of this evaluation and the reason for choosing the preferred Plan is presented below.

Alternative 1 - The Pareto Approach - would have led to some positive environmental effects and would have resulted in the reduction of GHG emissions in the sectors that the local authority can control or exert substantial influence on that contribute most in terms of GHG emission in the County - the Residential and Transport sectors. It is less likely that this alternative would have delivered the wide-ranging climate mitigation and offsetting related action required to fully realize GHG emission reduction potential in the County. It is also less likely this alternative would have defined a wide range of climate adaptation measures that would fully protect biodiversity, heritage resources, environmental receptors and people from climate change risks. This alternative approach may have generated several negative environmental effects, which would not be counterbalanced by the positive environmental effects associated with Alternatives 2 and 3.

Alternative 2 - The Holistic Approach - and Alternative 3 - The Holistic and Participatory Approach - would have both broadly delivered suitably wide ranging and effective climate action. These alternatives have the potential to generate multiple positive environmental effects, including a reduction in GHG emissions at organizational, community and sectoral levels, in addition to a variety of other environmental benefits. These alternatives would have placed a balanced emphasis on both climate mitigation and adaptation action, ensuring climate change related environmental risks are adequately understood and managed at community level.

Alternative 3 had the best potential to deliver effective climate action given its holistic, wide encompassing nature; and given its strong community engagement emphasis, which supports better participation in climate action at community level. Alternative 3 had better potential therefore to fully realize potential environmental effects than Alternative 2.

**Reasonable Alternative 3 - The Holistic and Participatory Approach - therefore constituted the preferred alternative or preferred plan.**



## 4. AA CONCLUSION

AA Screening of a draft version of the LACAP (the Draft LACAP) concluded that the Plan was likely to have significant effects on European sites forming part of the Natura 2000 network (in the absence of mitigation), either alone or in combination with other plans and projects.

It was concluded a Natura Impact Report (NIR) should be prepared for the Draft LACAP. Careful considerations were required with regard to the technical wording, focus and scope of the actions contained within the Draft LACAP, such that effects are avoided and/or minimised with regard to European sites and their Qualifying Interests and Special Conservation Interests.

An NIR was produced for the Draft LACAP. The NIR considered the potential for the LACAP to adversely affect the integrity of European sites, with regard to their Qualifying Interests and Special Conservation Interests. The Draft LACAP was informed by the AA and a Natura Impact Report was prepared outlining the likely environmental effects of the Plan on European sites in accordance with the Habitats Directive 92/43/EEC. Measures were integrated into the Draft LACAP that mitigate its potential effects on any European site.

The NIR for the LACAP accompanies this AA Conclusion Statement.

The NIR concluded the following:

- Stage 1 AA Screening and Stage 2 AA of the Kildare Local Authority Climate Action Plan 2024-2029 has been carried out. Implementation of the LACAP has the potential to result in effects to the integrity of any European sites, if unmitigated.
- The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the European sites have been addressed by the inclusion of mitigation measures that will prioritise the avoidance of effects in the first place and mitigate effects where these cannot be avoided. In addition, all lower-level plans and projects arising through the implementation of the LACAP will themselves be subject to AA when further details of design and location are known.
- In-combination effects from interactions with other plans and projects was considered in the assessment and the mitigation measures incorporated into the plan are seen to be robust to ensure there will be no significant adverse effects as a result of the implementation of the LACAP either alone or in-combination with other plans/projects.
- Having incorporated mitigation measures, it is concluded that the Kildare Local Authority Climate Action Plan 2024-2029 is not foreseen to give rise to any significant adverse effects on designated European sites, alone or in combination with other plans or projects. This evaluation is made in view of the conservation objectives of the habitats or species, for which these sites have been designated.

Having regard to the above, the plan as adopted will not have an adverse effect on the integrity of any European site.



**CONSULTANTS IN ENGINEERING,  
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