

Kildare County Council
Naas Local Area Plan 2021-2027
SEA Statement

Ref/1

Issue | 26 November 2021

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Job number 278388




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Job title		Naas Local Area Plan 2021-2027		Job number	
				278388	
Document title		SEA Statement		File reference	
Document ref		Ref/1			
Revision	Date	Filename	Naas LAP 2021-2027- SEA Statement_Issue 1.docx		
Issue 1	17 Nov 2021	Description	Issue		
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Issue Document verification with document



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1 Introduction

1.1 The Purpose of the SEA Statement

This Statement forms part of the Strategic Environmental Assessment (SEA) of the adopted Naas Local Area Plan (LAP) 2021 - 2027 ('The Plan'). SEA is a systematic, on-going process for evaluating (at the earliest possible stage) the quantity and consequences of implementing certain plans and programmes on the environment. This SEA Statement is the final stage of the SEA process and it is required under the European Communities Regulations 2004¹ (EU SEA Regulations) and national legislation² (SEA Regulations).

The purpose of the SEA Statement is to provide information on the decision-making process, and to document environmental considerations, the views of stakeholders and outline how recommendations arising from the SEA have been taken into account in the Plan. The four key requirements of this SEA Statement are to highlight:

- The incorporation of environmental considerations;
- Stakeholder involvement;
- Alterations considered; and
- Monitoring

The SEA Statement is chronological in nature and includes the following:

- An outline of the methodology for undertaking a SEA;
- Scoping - an overview of the scoping process and summary of how the submissions received from stakeholders have been taken into account;
- Environmental Assessment- description of how environmental considerations have been integrated into the SEA;
- Alternatives - an outline of the reasons for choosing the plan to be adopted, in light of the other reasonable alternatives considered;
- Monitoring - an overview of the measures to monitor the plan going forward; and
- Final Appraisal - evaluation of the effectiveness of the SEA.

This SEA Statement will accompany the adopted Naas Local Area Plan 2021 - 2027 and be made available to the public.

¹ European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations, as amended by European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2004

² Planning and Development (Strategic Environmental Assessment) Regulations, as amended by the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations

1.2 Statement of the SEA Process for the adopted Naas Local Area Plan 2021 - 2027

The adopted Naas LAP 2021 - 2027 is a statutory document containing guidelines as to how Naas should develop over the plan period. The adopted Naas LAP provides the overall strategy for the proposed planning and sustainable development within the plan area in the context of the Kildare County Development Plan 2017 – 2023 (as varied) and the Regional Spatial and Economic Strategy for the Eastern and Midlands Region (2019-2031). It represents the main public statements of planning policies and objectives for the plan area.

The policies and objectives are critical in determining the appropriate location and form of different types of development as the Naas LAP is the primary statutory land use policy framework against which planning applications are assessed. The objectives also guide Kildare County Council's activities and indicate priority areas or action and investment such as focusing on attracting employment into town, improving infrastructure or enhancing the town as a centre for sustainable tourism.

Current planning legislation identifies mandatory objectives which a plan must address including land use zoning and provision of services and infrastructure, the integration of social, community and cultural requirements, sustainable development and protection of the environment amongst others. In addition to these mandatory objectives, the Naas LAP also includes a section which details the plan's compliance with the Core Strategy contained in Kildare County Development Plan 2017-2023 (as varied) and sets out medium to longer term quantitative targets for the plan area. The Core Strategy sets out the overall population projection for the county and the extent of population growth to be accommodated in the towns, villages and rural areas and demonstrates that the Naas LAP and its objectives are consistent with the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midlands Region (2019-2031).

A broad SEA was carried out using an objective led approach to assess likely significant impact. The assessment was mostly qualitative in nature, with some assessment based on expert judgement. This qualitative assessment compared the likely impacts against the SEA objectives, targets and indicators to see which policies and objectives meet these and which, if any, contradict these.

A matrix system was developed to facilitate the assessment and to highlight potential impacts under a number of environmental headings namely biodiversity, population and human health, soil, water, air and climate factors, cultural heritage, landscape and material assets.

2 SEA Methodology

2.1 Overview

This section describes how the SEA was undertaken in accordance with legislative requirements including EU’s Council Directive 2001/42/EC (the SEA Directive), national legislation and associated regulations. The SEA was undertaken iteratively to facilitate discussions with Kildare County Council in order to implement mitigation where possible at the earliest possible stage.

The methodology for the SEA is based on legislative requirements and guidance from the Environmental Protection Agency (EPA) thus ensuring compliance with the SEA Directive and associated national legislation. The EPA’s SEA Pack (Version 18/02/2020) was also used as a source of information during the scoping process. The key stages outlined in Figure 2.1 were identified and are discussed in the following sections.

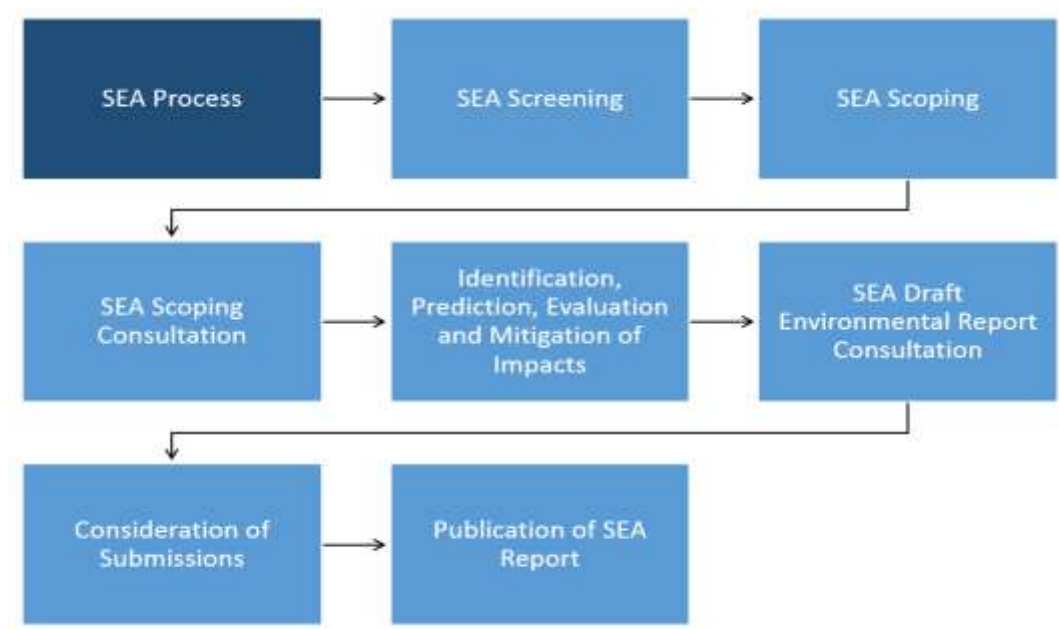


Figure 2.1: Key Stages of the SEA Process

2.2 Screening

Screening is the process for deciding whether a particular plan would warrant SEA. A screening assessment was undertaken as part of this SEA process to determine if the adopted Naas LAP required a SEA. This assessment concluded that a SEA was required due to the population within the plan area.

2.3 Scoping

Scoping is the process for establishing the range of environmental issues to be covered in the SEA and the level of detail that the assessment will investigate.

Scoping also allows input from the environmental authorities and stakeholders to be incorporated. Essentially, responses submitted as part of the scoping process provide greater focus on the evolution of the adopted Naas LAP.

The considerations addressed during the scoping process for the Draft LAP are as follows:

- The key elements of the Draft LAP to be assessed;
- The environmental aspects to be assessed as part of the SEA;
- Identification of relevant international, national and local plans, objectives and environmental standards that may influence or impact on the Draft LAP;
- Development of draft environmental objectives, indicators and targets to allow the evaluation of impacts as part of the SEA; and
- Identification of any reasonable alternative means or scenarios for achieving the strategic goals of the Draft LAP.

A scoping report for this SEA was prepared on behalf of Kildare County Council which asked key questions of stakeholders.

2.4 Baseline Assessment

Gathering relevant information that describes the current environment within the plan area is an integral part of the SEA process. The SEA Directive requires that certain information on the existing environment is presented to help assess the implementation of the Naas LAP, as well as helping establish how the environment would change if the Naas LAP is not implemented.

Baseline information has been collected from readily available sources, and a Geographical Information System (GIS) was used to graphically present and analyse relevant information. The baseline of the plan area, i.e. the area to which the adopted Naas LAP applies, is reported in Section 4 of the Environmental Report ('Current State of the Environment').

2.5 Environmental Assessment

The environmental assessment ran in parallel to the development of the adopted Naas LAP. The process is described in detail in Section 4 of this SEA Statement.

The environmental assessment process was undertaken in accordance with best practice SEA principals and guidance. This included review of baseline information, specialist investigation into the likely impacts associated with both the Naas LAP and its material alterations, and recommendations for suitable mitigation measures.

An appraisal matrix was developed to facilitate the assessment of the policies and objectives outlined in the adopted Naas LAP and its material alterations. The matrix-led assessment provided a holistic, integrated and interactive approach to the formation of the policies and objectives in the adopted Naas LAP.

The assessment also considered the findings of the Strategic Flood Risk Assessment (SFRA) and Appropriate Assessment (AA).

2.6 Consideration of Alternatives

The SEA Directive requires that reasonable alternatives to the plan be assessed in order to demonstrate how the preferred strategy performs against all other forms of action. Alternatives must be developed, described and assessed within the SEA process, with the results presented in the Environmental Report. This is examined in more detail in Section 4.

2.7 Flood Risk

An SFRA was prepared on behalf of Kildare County Council to provide information on the areas of flood risk and enable informed strategic land use planning decisions. This is examined in more detail in Section 4.

2.8 Appropriate Assessment

Stage 1 AA (Screening) was undertaken by Kildare County Council to identify if the potential for effects of implementing the adopted Naas LAP on the conservation status of designated Natura 2000 sites within the sphere of influence of the plan (or project). It was determined as part of this screening that the Draft LAP did not give rise to any potential significant effects and/or in-combination effects on European sites.

2.9 Consultation

There were multiple phases of statutory consultation undertaken during the preparation of the Naas LAP in relation to SEA.

The SEA Scoping Report was published in October 2020 for review and comment by defined statutory bodies and environmental authorities. This represents the first phase of statutory consultation and further information on this process is provided in Section 3.

A period of public, statutory consultation process took place during 9th March and 21st April 2021 to gather feedback on the Draft Naas LAP and supporting SEA Environmental Report.

A third and final statutory consultation process took place from Friday 23rd July to Monday 23rd August 2021, to gather feedback on the proposed material alterations to the LAP (and accompanying SEA addendum).

The content of submissions and comments received during each consultation period were considered by Arup and Kildare County Council, and amendments were made in response to those consultation inputs, where considered appropriate.

2.10 Technical Difficulties Encountered

No major technical difficulties were encountered during any stage of the SEA process.

3 SEA Scoping

3.1 Scoping Process

Scoping Process

The SEA Scoping was a key part of the assessment process as it set out the extent of the SEA and AA and provided information to allow consultation with defined statutory bodies and environmental authorities on the scope and level of detail to be considered and incorporated at an early stage in the assessment.

The scoping report for this SEA was published in October 2020 and outlined that the SEA would assess the following aspects:

- Population and Human Health;
- Biodiversity (including Flora and Fauna);
- Soil;
- Water Resources;
- Air, Noise and Climate Factors;
- Archaeology, Architectural and Cultural Heritage;
- Landscape and Visual; and
- Material Assets

The report summarised the key environmental issues and outlined relevant plans and programmes that were likely to affect or be affected by the Naas LAP.

This information was then used to set out a series of draft SEA objectives, indicators and associated targets. The objectives and targets established aims and thresholds which would be taken into consideration to effectively assess the impact of the Naas LAP on the environment. Indicators were used to track the achievements of objectives and targets, describe the baseline situation, monitor the impact on the environment and predict impacts.

Essentially, any issues/comments submitted as part of the scoping provides greater focus on the development of aspects of the Naas LAP. The issues addressed as part of the Scoping Report were:

- The key elements of the Naas LAP to be assessed;
- The key environmental issues to be assessed;
- Research of the relevant international, national and local plans, objectives and environmental standards that may influence or impact on the Naas LAP;
- Development of draft environmental objectives, indicators and targets to allow the evaluation of impacts; and
- Identification of reasonable alternatives means of achieving the strategic goals of the Naas LAP.

3.2 Scoping Consultation

The SEA Scoping Report was published in October 2020 for review and comment by defined statutory bodies and environmental authorities.

During the SEA Scoping Report consultation period, two submissions were received, one from the Environmental Protection Agency EPA and one from the Department of Communications, Climate Action & Environment on behalf of Inland Fisheries Ireland (IFI).

All comments, observations and submissions contained therein were considered and incorporated into the assessment process, as considered relevant. Appendix A of this report contains a summary of the submissions received on the SEA Scoping Report, and how they were responded to.

4 Environmental Assessment

As outlined in Section 2.5, the environmental assessment comprised a review of the baseline data, identification of likely impacts and development of appropriate mitigation measures for the Naas LAP. The environmental assessment was undertaken by way of the appraisal matrix and recorded in the Draft SEA Environmental Report which went out for public consultation on 9th March 2021 seeking feedback from stakeholders.

The Naas LAP was updated to reflect input from the public, statutory and non-statutory bodies and local representatives provided during the period of public consultation. The SEA team and Kildare County Council worked together on this, continuing the iterative process to optimise outcomes arising from the Naas LAP. Each time a revision of wording was considered, the appraisal matrix and associated Environmental Report were also adjusted as required.

Advice was provided to Kildare County Council regarding the options for mitigation that could be incorporated to optimise benefits and lessen adverse environmental impacts arising from the Naas LAP.

Appendix B (Table B2) contains a summary of the submissions received during public consultation (as they relate to the SEA only), and how they were responded to.

4.1 Establishment of the Baseline

The SEA requires the assessment of the likely impacts of the Naas LAP against the current environmental conditions, i.e. the baseline. The establishment of the baseline was cognisant of the local nature of the Naas LAP and considered existing conditions within the plan area as well as pressures, inter-relationships and factors of relevance for the following environmental aspects:

- Population and Human Health;
- Biodiversity (including Flora and Fauna);
- Land and Soils
- Water Resources;
- Air, Noise and Climate Factors;
- Archaeological, Architectural and Cultural Heritage;
- Landscape and Visual; and
- Material Assets.

4.2 Objectives, Indicators and Targets

The objectives, indicators and targets are the aspects for which the Naas LAP is assessed against. The policies and recommendations in the Naas LAP are assessed against a range of environmental objectives and targets established for the purpose of the SEA. Further, indicators that are recommended in the SEA are utilised over the lifetime of the Naas LAP to quantify the level of impact that the proposed plan may have on the environment. It is then possible to establish whether Kildare County Council were successful in promoting the sustainable development of the plan area.

A summary of the objectives, in indicators and targets is included in Table 4.2

Table 4.2: Objectives, Indicators and Targets

Objectives	Targets	Indicators
SEO 1 Biodiversity		
<p>SEO 1.1 Protect, conserve, enhance where possible and avoid loss of diversity and integrity of the broad range of habitats, species and wildlife corridors.</p> <p>SEO 1.2 To support achievement of the conservation objectives of European Sites (SACs and SPAs) and other sites of nature conservation.</p> <p>SEO 1.3 Conserve and protect other sites of nature conservation including NHAs, pNHAs, National Parks, Nature Reserves, Wildfowl Sanctuaries as well as protected species outside these areas as covered by the Wildlife Act.</p> <p>SEO 1.4 To minimise and, where possible, eliminate threats to biodiversity including invasive species.</p>	<p>SET 1.1 Siting of development of infrastructure installation on non-sensitive sites.</p> <p>SET 1.2 Maintenance of favourable conservation status for all habitats and species protected under the Habitat Directive.</p> <p>SET 1.3 No loss of protected habitats and species during the lifetime of the Plan.</p> <p>SET 1.4 No significant ecological networks or parts thereof which provide functional connectivity for SAC/SPAs to be lost without remediation resulting from development provided for by the LAP.</p>	<ul style="list-style-type: none"> • SEI 1.1 Number and extent of designated Sites; • SEI 1.2 Achievement of favourable conservation status of designated sites; • SEI 1.3 Population and range of Designated Species; and • SEI 1.4 Achievement of the Objectives of Biodiversity Plans and County Development Plans.
SEO 2 Population and Human Health		
<p>SEO 2.1 Protect, enhance and improve people's quality of life through energy provision.</p> <p>SEO 2.2 Protect human health from hazards or nuisances arising from incompatible development.</p> <p>SEO 2.3 Provide all of the energy services required to sustainably meet future housing demands.</p> <p>SEO 2.4 To minimise the proximity of development to concentrations of population and to mitigate potential effect of development in order to reduce actual and perceived environmental effects.</p>	<p>SET 2.1 Minimise population exposure to high levels of noise, vibration and air pollution.</p> <p>SET 2.2 No significant deterioration in human health as a result of environmental factors.</p> <p>SET 2.3 No spatial concentrations of health problems arising from environmental factors.</p> <p>SET 2.4 Maintenance of gas supply to meet the energy needs of the population, while commencing a shift towards renewable energy use.</p>	<ul style="list-style-type: none"> • SEI 2.1 Census population data; • SEI 2.2 % increase in housing (number and type); and • SEI 2.3 Changes in trends in perceived health status.
SEO 3 Land & Soil		
<p>SEO 3.1 Conserve, protect and avoid loss of diversity and integrity of designated habitats, geological features, species or their sustaining resources in designated ecological sites.</p>	<p>SET 3.1 Prevent pollution of soil through adoption of appropriate environmental protection procedures during construction, installation and maintenance works on site.</p> <p>SET 3.2 No incidences of soil contamination.</p> <p>SET 3.3 Ensure appropriate management of existing contaminated soil in accordance with the requirements of current waste legislation.</p>	<ul style="list-style-type: none"> • SEI 3.1 Incidences of soil contamination; • SEI 3.2 Rates of re-use/recycling of construction waste; • SEI 3.3 Rates of brownfield site and contaminated land reuse and development; and • SEI 3.4 Rates of greenfield development.

Objectives	Targets	Indicators
SEO 4 Water		
<p>SEO 4.1 Maintain or improve the quality of surface water and groundwater (including estuarine) to status objectives as set out in the Water Framework Directive (WFD).</p> <p>SEO 4.2 Support achievement of the requirements of the Water Framework Directive and implementation of the National River Basin Management Plan'</p>	<p>SET 4.1 Support the achievement of “good” ecological and chemical status/potential of waterbodies by 2015 in accordance with the Water Framework Directive³.</p> <p>SET 4.2 Not to cause deterioration in the status of any surface or ground water or affect the ability of any surface or groundwater to maintain or achieve ‘good’ status.</p>	<ul style="list-style-type: none"> • SEI 4.1 Compliance of surface and ground waters with national and international standards; • SEI 4.2 Achievement of the Objectives of the River Basin Management Plan;
SEO 5 Air & Noise		
<p>SEO 5.1 To support the protection of ambient environment through the implementation of European, national and regional policy and legislation relating to air quality, greenhouse gases, climate change, light pollution noise pollution and waste management.</p>	<p>SET 5.1 Maintain ambient air quality.</p> <p>SET 5.2 Minimise air and noise emissions during construction and operation of new developments.</p>	<ul style="list-style-type: none"> • SEI 5.1 Air quality indicators- National and region-specific emission data; and • SEI 5.2 Compliance with national standards.
SEO 6 Climate and Resilience		
<p>SEO 6.1 Comply with relevant national climate change targets e.g. Ireland’s Climate Action and Low Carbon Development Act 2015⁴, the and EU 2030 and 2050 Emissions and Renewable Energy Targets and the Paris Agreement Targets.</p> <p>SEO 6.2 To support implementation of the National Climate Action Plan 2019⁵</p>	<p>SET 6.1 Achieve a reduction in greenhouse gas emissions.</p> <p>SET 6.2 Increase the amount of gas from renewable sources that is introduced to the network.</p> <p>SET 6.3 Growth in the level of fuel switching from high-carbon fuels to gas, in both heating and transport.</p> <p>SET 6.4 Promote minimisation of greenhouse gas emissions to the atmosphere.</p> <p>SET 6.5 To achieve a 30% reduction on GHG emission levels (compared with 2005 levels) by 2030⁶.</p>	<ul style="list-style-type: none"> • SEI 6.1 Levels of greenhouse gas emissions; • SEI 6.2 Number of energy/renewable energy production facilities; and • SEI 6.3 Rates of energy/renewable energy consumption.

³ River Basin Management Plans (RBMPs) are prepared and reviewed every six years. The first RBMPs covered the period 2010 to 2015. The second cycle plan covers the period 2018-2021 and was published by the government on 17 April 2018.

⁴ As amended by the Climate Action and Low Carbon Development (Amendment) Act 2021

⁵ Superseded by Climate Action Plan 2021

⁶ Climate Action and Low Carbon Development (Amendment) Act 2021 includes for a reduction of 51% in GHG emissions by end of 2030 relative to 2018 levels

Objectives	Targets	Indicators
SEO 7 Archaeological, Architectural and Cultural Heritage		
<p>SEO 7.1 Promote the protection and conservation of archaeological, architectural and cultural heritage, specifically those buildings identified on the Record of Protected Structures, and Recorded Monuments in Ireland.</p>	<p>SET 7.1 Maintenance and enhancement of archaeological heritage- including entries to the Record of Monuments and Places and unknown archaeology- and the context of the above within the surrounding landscape where relevant.</p> <p>SET 7.2 Maintenance and enhancement of entries to the Record of Protected Structures and/or their context within the surrounding landscape where relevant.</p>	<ul style="list-style-type: none"> • SEI 7.1 Achieving the objectives of development plans regarding heritage protection; and • SEI 7.2 full or partial loss to entries to the RPSs/NIAHs
SEO 8 Landscape and Visual		
<p>SEO 8.1 Ensure no significant disruption of historic/cultural landscapes and features.</p> <p>SEO 8.2 Ensure no significant visual impact from developments/installations.</p> <p>SEO 8.3 Ensure no significant disruption of high landscape values.</p> <p>SEO 8.4 To support achievement of the objectives of the National Landscape Strategy</p>	<p>SET 8.1 No avoidable significant impacts on the landscape resulting from development provided for by the LAP.</p> <p>SET 8.2 Ensure development and infrastructure installations are sensitive to its surroundings.</p> <p>SET 8.3 Ensure no significant disruption of historic/cultural landscapes and features.</p>	<ul style="list-style-type: none"> • SEI 8.1 Range and extent of Amenity Landscapes; • SEI 8.2 Rates of development within designated landscapes; • SEI 8.3 Rates of urban expansion; and • SEI 8.4 % change of land use from rural to urban.
SEO 9 Material Assets		
<p>SEO 9.1 Make best use of existing infrastructure and phase the significant future growth of Ireland in line with the capacity and delivery of the sustainable development of new physical infrastructure.</p> <p>SEO 9.2 Promote use of renewable energy sources and support energy conservation initiatives including the development of low carbon business practices and buildings.</p> <p>SEO 9.3 Minimise effects upon the existing and planned infrastructure.</p>	<p>SET 9.1 High levels of energy demand growth are accommodated.</p> <p>SET 9.2 Secure and competitive supplied of gas and are maintained.</p> <p>SET 9.3 Increase in renewable energy developments.</p> <p>SET 9.4 To achieve a 30% reduction on GHG emission levels (compared with 2005 levels) by 2030⁶.</p> <p>SET 9.5 Improve efficiencies of energy infrastructure.</p>	<ul style="list-style-type: none"> • SEI 9.1 Location/level of infrastructure; • SEI 9.2 Achievement of development plan objectives; and • SEI 9.3 No. of renewable energy developments granted planning permission.

4.3 Consideration of Alternatives

This first stage of the SEA involved an environmental assessment of the alternative scenarios considered for the Naas LAP. The alternatives considered are summarised below:

Alternative Scenario 1- Northwest Quadrant Expansion. This scenario includes:

- Development of employment and residential land-uses, and provision of ancillary services to facilitate new neighbourhood quarter;
- The provision of infrastructural links back to the town centre and around the town centre;
- Development in close proximity to planned strategic infrastructural improvements – N7/M7 upgrade and Sallins Train Station.

Alternative Scenario 2- Eastern Expansion and Town Centre Consolidation. This scenario includes:

- Focused on greenfield lands to the east of the town while seeking to consolidate the town centre by development of vacant or underutilised sites;
- The zoning of former agricultural lands for new residential development and provision of new and upgraded infrastructural links.

Alternative Scenario 3- Southwest Expansion. This scenario includes:

- Growth of employment and residential development to the south west, to merge with the Killashee and Jigginstown areas;
- Focuses on the development of new residential and employment uses in the environs of the town centre, in proximity to the M7 Motorway.

Alternative Scenario 4- Town Centre Regeneration, Northwest Quadrant Expansion plus the development of extants. This scenario includes:

- Regeneration and appropriate development of vacant and under-utilised sites in the town.
- Accommodate many employments uses. This could be clustered with Kerry group and surrounding industries around the northwest sector of the ring road.

The SEA team determined that based on the assessment findings, the emerging preferred scenario was Alternative Scenario 4. This development scenario involves the consolidation of the existing town centre by encouraging the regeneration and appropriate development of vacant and under-utilised sites in the town.

Urban regeneration and redevelopment can substantially contribute to the sustainable development of urban areas and are likely to result in an overall positive impact on the environment.

Much of the town centre of Naas is already zoned for development, so by focusing on the re-development and regeneration of these zonings rather than zoning new greenfield land for development on the periphery, additional environmental impacts can be avoided. Similarly, by focusing on the sequential development of already zoned residential and employment lands in the Northwest Quadrant, the Council can seek to meet the demands of the growing population of the LAP area, without having to develop on greenfield lands.

These initiatives will both work towards reducing the onset of urban sprawl in Naas. Urban sprawl and the prevalence of low-density development on the periphery of urban centres work to exacerbate problems of over-consumption of greenfield land, dependence on private transport and long commuting distances.

Thus, consolidation of the town will likely result in a positive impact on air, noise and climate. A positive impact on population and human health is also envisaged, through the provision of residential and commercial opportunities. A high population density in the Town Centre of Naas could however put a strain on utilities and services, and it should be ensured that there is sufficient water and wastewater capacity to facilitate any residential development.

It is not possible to fully ascertain the potential impact on heritage, as a large portion of the town is designated as an Architectural Conservation Area. Any development in this area could negatively impact on sites or buildings of historical or architectural significance.

High density housing can also result in a landscape and visual impact if residential units are too intrusive- the scale or density of the development proposed under this scenario is not known.

For the purpose of this assessment, it is assumed that this scenario relates to land that is predominantly already zoned for employment and residential development in the Northwest Quadrant and does not generally relate to greenfield development. As such, an overall neutral impact on the environment in general is predicted. A positive impact on population and human health is likely to occur through the provision of a new neighbourhood centre and indeed the fulfilment of new residential and employment opportunities.

4.4 Assessment Stage 1 - Initial Draft Plan

The first stage of the SEA assessment process comprised the first draft of the appraisal matrix that was completed by the SEA team based on the initial draft of the Naas Local Area Plan and provided to Kildare County Council for their consideration.

This objectives-led assessment compared the likely impacts of each policy and objective in the initial Draft Naas LAP against the strategic environmental objectives (as described in Section 4.2) with respect to the baseline information. Particular reference was made to the potential for cumulative effects in association with other relevant plan and programmes within Kildare County Council and the Eastern and Midlands Region.

The assessment process categorised environmental impacts using the ratings outlined in **Table 4.3** which is based on the impact assessment criteria defined by the EPA for environmental impact assessment.

Table 4.3: Impact Ratings

Significance of Impact	
	Positive
	Neutral
	Negative
	Uncertain

The assessment also considered the cumulative effects of policies on each other to determine if certain policies working in combination could have an environmental impact.

Upon completion of the first appraisal matrix, a number of recommendations were made which were then reviewed in detail by Kildare County Council and where appropriate, incorporated into the Draft Naas LAP.

4.5 Assessment Stage 2 - Final Draft Plan

The next stage of the assessment comprised the revision of the appraisal matrix to take on board comments received from Kildare County Council on the initial draft plan and the associated first draft appraisal matrix.

This appraisal matrix was incorporated into the SEA Draft Environmental Report that accompanied the Draft Naas LAP that went out for public consultation on 9th March 2021. The principle environmental effects, as per the assessment matrix, identified are summarised below.

Biodiversity

The land use zonings and objectives of the Draft LAP will primarily result in a neutral or positive impact on Biodiversity. Development will be largely consolidated within existing zoned or developed lands, with a large portion of development within the existing urban centre of the LAP area.

Uncertainties exist where the precise nature and extent of development is unknown. This is particularly relevant to the various green infrastructure objectives- where it is difficult to ascertain if the proposals relate to natural features, such as parks and hedgerows, or man-made features, such as cycle paths. Most natural green infrastructure features are likely to result in a positive impact on biodiversity, through species and habitat provision, while often man-made features such as greenways can result in a negative impact on the existing biodiversity through increased human interaction.

There is the potential for negative impacts to occur where greenfield lands have been zoned for development- such as the land at the north-east of the plan area, which has the potential, even with the provision of mitigation, to impact on habitats and species.

Similarly, potential negative effects on biodiversity are identified where large-scale infrastructure is proposed such as the Sustainable Travel Bridge over the M7, new road schemes or the electrification of the DART line and expanded Park and Ride facility at Sallins railway station⁷.

Population and Human Health

The potential impacts for Population and Human Health are predominantly positive with regards the provision of residential, economic and sustainable transport opportunities in the LAP area.

It is proposed to consolidate the town centre through the regeneration and redevelopment of vacant and under-utilised sites. This will likely result in a positive impact on population and human health, as it discourages urban sprawl, reduces traffic movements, enhances the public realm and encourages more sustainable transport methods.

Policies and objectives relating to improvements to the public realm and accessibility of the town centre will also positively impact the population of Naas.

It is proposed to provide a new residential development Key Development Area at the Devoy Barracks, along with lands zoned for new residential development and the Core Regeneration Area sites in the town centre. This will seek to ensure that the longer-term development of Naas is provided for.

The promotion of enterprise and employment development in the Northwest Quadrant will also result in a positive impact on the population on Naas, through increased job opportunities.

Positive impacts will also occur where new transport infrastructure is provided for, or existing infrastructure is upgraded through the provision of improved access through the LAP area. This is particularly true in considering new sustainable transport infrastructure/opportunities.

Land and Soils

The majority of potential impacts for Land and Soils are neutral or positive as development will primarily be consolidated within existing zoned or developed lands.

Uncertainties will occur where the precise nature and extent of proposed new development is unknown.

There is the potential for negative impact to occur where greenfield lands have been zoned for development- such as the land at the north-east of the plan area, as well as where new roads are proposed.

⁷ Notwithstanding objectives MTO2.5 and MTO2.6 of the Plan, it is noted the rail line and station are located outside of the LAP boundary.

Water Resources

The land use zonings and objectives of the Draft LAP will primarily result in a neutral impact on Water as development will largely take place within existing zoned or developed lands.

There is the potential for negative impacts to occur where greenfield lands have been zoned for development- such as the land at the north-east of the plan area. Similarly, potential negative effects on water are identified where large-scale infrastructure is proposed such as the Sustainable Travel Bridge over the M7, new road schemes or the electrification of the DART line and expanded Park and Ride facility at Sallins railway station⁸.

A Strategic Flood Risk Assessment (SFRA) has been carried out in support of the LAP. The SFRA has recommended a number of flood risk management objectives for specific areas, ensuring planning applications, where applicable, will require a FRA of appropriate detail. The level of detail within the FRA will depend on the risks identified and the proposed land use.

Air, Noise and Climate Factors

The potential impacts on Air, Noise and Climate are predominantly positive or neutral as the proposals to consolidate the town centre will likely result in a reduction in traffic movements.

The plan also promotes sustainable travel modes while making provisions for improved pedestrian and cycle routes in, and around the town centre. Such measures will have a positive effect on air, noise and climate.

This Draft Plan comprises a range of climate change adaptation objectives relating to the promotion of renewable energies, sustainable transport, energy reduction etc. These objectives will likely result in a positive impact on air quality and climate change mitigation.

Uncertainties will occur where the precise nature and extent of proposed new development is unknown. There is the potential for negative impacts to occur where new roads objectives are proposed.

Proposed new road schemes are likely to result in a negative air quality, noise and climate impacts due to both the materials used in construction, but also by means of the encouragement of private vehicle use.

Heritage

The land use zonings and objectives of the Draft LAP will primarily result in a positive or neutral impact on Heritage as development will largely take place within existing zoned or developed lands.

Where urban regeneration or redevelopment is proposed in the town centre, it is not possible to fully ascertain if this is likely to result in a negative impact on heritage, as much of the town comprises an ACA.

⁸ It is noted the rail line and station are located outside of the LAP boundary.

There are certain implications for development within an ACA - protection generally relates to the external appearance of structures and features of the streetscape. Generally, any works that may have a potential impact on the exterior would require planning permission, such as changes to the original roofing material, windows, boundary walls etc. The aim of ACA designation is not to prevent development, rather to guide sensitive, good quality development, which will enhance both the historical character of the area and the amenity of those who enjoy it.

Other uncertainties will occur where the precise nature and extent of proposed new development is unknown and where the discovery of heritage features cannot be ruled out.

The plan does however place a significant emphasis on the retention, protection and enhancement of existing heritage features within the LAP area.

There is the potential for negative impacts to occur where greenfield lands have been zoned for development- such as the land at southwest of the plan area, as this has the potential to impact on archaeology.

Landscape and Visual

The majority of potential impacts for Landscape and Visual are neutral.

A number of positive impacts on the townscape of Naas will likely result from the range of regeneration and urban realm proposals included in the Draft Plan.

Uncertainties exist where the precise nature, extent or scale of proposed development is unknown.

There is the potential for negative impacts to occur where greenfield lands have been zoned for development- such as the land at such as the land at southwest of the plan area, or where new roads objectives are proposed. This is particularly relevant with regards the proposed new road schemes.

Material Assets

In general, the potential impacts on Material Assets are largely considered as positive or neutral. This is because development will occur in a manner that is balanced and self-sustaining occurring in tandem with physical and social infrastructure.

The proposed consolidation of development in the town centre of Naas has however the potential to result in a negative impact on material assets. A high population density could put a strain on material assets, and it should be ensured that there is sufficient water and wastewater capacity to facilitate any residential development. However, the recent upgrade to Osberstown WWTP should accommodate all development proposed under the plan.

Interactions and Interrelationships

In accordance with the SEA Directive, the inter-relationship between environmental aspects must be taken into account.

The interaction and inter-relationships of relevance for the environmental baseline aspects was an important consideration for the environmental assessment.

Table 4.1 outlines the identifiable inter-relationships that were taken into account during the environmental assessment. It is noted that all environmental aspects interact with each other to some extent, however only significant relationships were considered.

Table 4.1: Key inter-relationships between environmental aspects.

	Biodiversity	Population and Human	Land and Soil	Water	Air, Noise, Climate	Heritage	Landscape & Visual	Material Assets
Biodiversity								
Population and Human Health	No							
Land and Soil	Yes	Yes						
Water	Yes	Yes	Yes					
Air, Noise, Climate	Yes	Yes	No	No				
Heritage	No	No	Yes	No	No			
Landscape & Visual	Yes	Yes	No	No	No	Yes		
Material Assets	Yes	Yes	Yes	Yes	Yes	Yes	Yes	

4.5.1 SEA Environmental Report- Consultation

As outlined in Section 2.9, the SEA Environmental Report was subject to a period of statutory consultation to gather feedback in accordance with legislative requirements. The documents were sent to statutory stakeholders and made available for public viewing at Kildare County Council's dedicated online public consultation portal and a public notice in the Leinster Leader.

Upon completion of the consultation period, a Chief Executive's Report on the 915 No. submissions received was prepared to take into consideration the comments and observations made.

Submissions were also reviewed to consider any comments received in relation to the SEA. As previously stated, Appendix B, Table B2, contains a summary of the submissions received (as they relate to the SEA only), and how they were responded to.

4.6 Assessment Stage 3 - Material Alterations

In accordance with Section 20 of the Planning and Development Act 2000 (as amended), it was resolved by the Members at a Special Meeting of Kildare County Council on the 5th July 2021 to amend the Draft Naas LAP, and that these modifications constituted a material alteration to the Draft LAP.

The 76 No. amendments related to a change in the plan area as well as modifications to some objectives and the provision of additional objectives.

A screening exercise was undertaken, and 2 No. of the proposed material alterations were deemed to have the potential for environmental effects and were brought forward for full Strategic Environmental Assessment. An appraisal matrix was developed to facilitate the assessment of these proposed material alterations. The screening exercise identified that two of the proposed material alterations (No.21 and 61) has the potential to give rise to negative environmental effects.

The findings of this assessment were set out in the addendum which was prepared to support the Draft SEA Environmental Report.

4.6.1 Proposed Material Alterations -Consultation

This addendum and the amended Naas LAP were subject to a four-week period of consultation from 23rd July to 23rd August 2021 inclusive.

Some 160 No. submissions were received in relation to the material amendments and/or the SEA addendum, including one from Office of the Planning Regulator and 11 from other prescribed authorities. Upon completion of the consultation period, the Chief Executive's Report on submissions was prepared to take into account comments received.

Appendix C (Table C1) contains a list of the 160 No. submissions received on the proposed Material Alterations. Table C1 provides a summary of the submissions which related to the SEA and how they were responded to.

5 Mitigation

Mitigation measures are measures envisaged and designed to prevent, reduce and as fully as possible, offset any significant adverse effects on the environment of implementing the Naas LAP. All mitigation measures have been developed and agreed with KCC as part of the SEA iterative process.

The primary mitigation measure is to ensure the sustainable and appropriate development of Naas and its environs without compromising the integrity of the natural and built environment. All new development that requires an Environmental Impact Assessment (EIA) in accordance with EIA legislation will address the range of environmental objectives, indicators and targets and associated environmental mitigation measures and incorporate them into the project specific mitigation measures. **Table 5.1** summarises the proposed mitigation measures

Table 5.1: Proposed Mitigation Measures

Aspect	Mitigation measures
Biodiversity	To afford the highest level of protection to all designated European sites and species in accordance with the relevant legislation
	To require all planning applications for development that may have (or cannot rule out) likely significant effects on European Sites in view of the site's Conservation Objectives, either in isolation or in combination with other plans or projects, to submit a Natura Impact Statement in accordance with the requirements of the EU Habitats Directive and the Planning and Development Act, 2000 (as amended)
	To recognise and afford appropriate protection to any existing, new, or modified SPAs or SACs that are identified during the lifetime of the LAP
	To implement Article 6(3) and where necessary 6(4) of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s)
	To have regard to Appropriate Assessment of Plans and Projects in Ireland – Guidelines for Planning Authorities 2009 or any updated version.
	To actively promote the conservation and protection of areas designated as an NHA (including proposed sites) and to only consider proposals for development within or affecting an NHA where it can be clearly demonstrated that the proposed development will not have a significant adverse effect on the NHA or pNHA;
	To identify and afford appropriate protection to any new, proposed or modified NHAs identified during the lifetime of this plan.
	To ensure the protection and conservation of areas, sites, species and ecological networks/corridors of biodiversity value outside of designated sites throughout the country and to require an ecological assessment to accompany development proposals likely to impact on such areas or species.

Aspect	Mitigation measures
	<p>To implement the EIA Directive, ensuring that all elements/stages or components of the project are included in one overall assessment and all reasonable alternatives are taken into consideration in choosing the option with the least environmental impact.</p> <p>To have regard to “Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessments (2013)’ when considering proposals for which an EIA is required;</p> <p>To protect and promote the sustainable management of the natural heritage, flora and fauna of the county through the promotion of biodiversity, the conservation of natural habitats and the enhancement of new and existing habitats</p> <p>To promote the conservation of biodiversity through the protection of sites of biodiversity importance and wildlife corridors, both within and between the designated sites and the wider Plan area;</p> <p>To ensure that development proposals support and enhance the connectivity and integrity of habitats in the plan area by incorporating natural features into the design of development proposals.</p> <p>To raise awareness of the threat of alien invasive species and take all necessary steps to prevent the spread of non-native invasive species and noxious weeds in the plan area, including requiring landowners, developers and boat operators to adhere to best practice guidance in relation to their control;</p> <p>To implement the requirements of EU Regulations 1143/2014 on the Prevention and Management of the Introduction and Spread of Invasive Alien Species.</p> <p>The development of new infrastructure should be subject to site options assessment and environmental assessment, where required.</p>
Population and Human Health	<p>Ensure that access to adequate health and education facilities to meet the demand of the current and projected populace are included in development plans.</p> <p>To consult with and have regard to the technical advice of the Health and Safety Authority and assessing planning applications where the Major Accidents Directive and any associated regulations are relevant</p> <p>Encourage the further development of regional sustainable and public transport infrastructure including rail and bus corridors.</p>
Land and Soil	<p>To ensure that contaminated soil is disposed of in accordance with the Waste Management Regulations (S.I.821 of 2007)</p> <p>Perform a survey of obsolete urban renewal areas and facilitate and promote the reuse and regeneration of brownfield sites, derelict land and buildings in and around urban centres.</p> <p>To recognise the importance of Geological Heritage Sites and to protect the character and integrity of these sites</p> <p>To work with the GSI and relevant stakeholders to undertake a review of Geological Heritage Sites in the county during the lifetime of this Plan.</p>
Water Resources	<p>To work with all relevant stakeholders to protect and manage inland waters, river corridors and their floodplains, turloughs, lakes, fens and other water bodies from degradation and damage, and to recognise and promote them as natural assets and key elements in the green infrastructure network in the county;</p> <p>To facilitate the implementation of the relevant River Basin Management Plan for ground, surface, estuarine, coastal and transitional waters in the plan area as part of the implementation of the EU Water Framework Directive;</p>

Aspect	Mitigation measures
	<p>To protect groundwater resources in accordance with the statutory requirements and specific measures as set out in the relevant River Basin Management Plan</p> <p>To consider proposals for development where it can be clearly demonstrated that the development will meet the requirements of the relevant River Basin Management Plan.</p> <p>To ensure that developments that would have an unacceptable impact on water resources, including surface water and groundwater quality and quantity, designated sources protection areas, estuarine, coastal transitional waters, river corridors and associated wetlands will not be permitted;</p> <p>In areas of potable groundwater resources or over vulnerable aquifer areas, development proposals will only be considered if the applicant can clearly demonstrate that the proposed development will not pose a risk to the quality of the underlying groundwater;</p> <p>Prevent the alteration of natural drainage systems and in the case of development works require the provision of acceptable mitigation measures in order to minimise the risk of flooding and negative impacts on water quality.</p> <p>Comply with the objectives and policies of the Eastern Catchment Flood Risk Assessment Management Study.</p> <p>Promote SUDS principles for all drainage including the integration of storm water attenuation facilities for new developments and existing catchment areas.</p> <p>Ensure that any new development does not present an inappropriate risk of flooding or does not cause or exacerbate such a risk at other locations.</p> <p>Comply with the DoECLG/OPW guidance on development and flood risk through the control of development in any flood plain so that new and existing developments are not exposed to increased risk of flooding and that any loss of flood storage is compensated for elsewhere in the river catchment.</p>
Air Noise and Climate	<p>Ensure that the objectives and policies of EU Air Quality legislation are incorporated into plans and programmes upon implementation into Irish law.</p> <p>Promote the reduction of emissions of Greenhouse Gases and facilitate measures which seek to reduce emissions of greenhouse gases to ensure Ireland's compliance with our Emission Targets.</p> <p>Facilitate sustainable transport modes and the use of walking, cycling and public transport.</p> <p>Consideration of existing noise policy in County Kildare for example noise mapping and noise action plans produced by the Local Authority.</p> <p>Consideration of likely noise impacts/effects associated with new developments. This includes being cognisant of proximity to sensitive receptors when siting new developments and consideration of existing noise sources when zoning lands for residential development.</p> <p>To support the implementation of the Climate Change policy documents and legislation outlined in the ER.</p> <p>To ensure that developments do not give rise to negative effects on air quality, during both construction and operation.</p>

Aspect	Mitigation measures
Heritage	To ensure the protection of the architectural heritage through the identification of Protected Structures, the designation of Architectural Conservation Areas, the safeguarding historic gardens, and the recognition of structures and elements that contribute positively to vernacular and industrial heritage
	To protect, as set out in the Record of Protected Structures, all structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest
	To review the Record of Protected Structures periodically and add structures of special interest as appropriate, including significant elements of industrial, maritime or vernacular heritage and any twentieth century structures of merit.
	To ensure that new developments within or adjacent to an ACA respect the established character context of the area and contribute positively to the ACA in terms of design, scale, setting and material finishes;
	To protect existing buildings, structures, groups of structures, sites, landscapes and features such as street furniture and paving, which are considered to be intrinsic elements of the special character of the ACA, from demolition or removal and non-sympathetic alterations;
	To ensure that all new signage, lighting, advertising and utilities to buildings within an ACA are designed, constructed and located in a manner that does not detract from is complementary to the character of the ACA;
	To safeguard sites, features and objects of archaeological interest generally;
	To secure the preservation (i.e. preservation in situ or in exceptional cases preservation by record) of all archaeological monuments included in the Record of Monuments and Places as established under Section 12 of the National Monuments (Amendment) Act, 1994, and of sites, features and objects of archaeological and historical interest generally;
	To have regard to the government publication Framework and Principles for the Protection of the Archaeological Heritage 1999 in relation to protecting sites, features and objects of archaeological interest
	To protect and preserve archaeological sites discovered since the publication of the Record of Monuments and Places.
	To protect the Zones of Archaeological Potential located within both urban and rural areas as identified in the Record of Monuments and Places.
	To have regard to archaeological concerns when considering proposed service schemes located in close proximity to Recorded Monuments and Places and the Zones of Archaeological Potential.
Landscape and Visual	Ensure that all new plans and programmes incorporate the findings of the County Landscape Character Assessments.
	To require that all proposed developments in Heritage Landscapes demonstrate that every effort has been made to reduce visual impact. This must be demonstrated for all aspects of the proposal- from site selection through to details of siting and design. All other relevant provisions of the development plan must be complied with.
	Protect and enhance the streetscape of Naas' Main Street through the appropriate control of alterations to existing buildings and the development of new structures; in particular building and roof lines and heights which diverge from the established form will require to be justified.

Aspect	Mitigation measures
	<p>To protect sensitive areas from inappropriate development while providing for development and change that will benefit the rural community.</p> <p>To ensure that proposed developments take into consideration their effects on views from the public road towards scenic features or areas and are designed and located to minimise their impact.</p> <p>To ensure that appropriate standards of location, siting, design, finishing, and landscaping are achieved.</p>
Material Assets	<p>Promote the implementation of the Waste Management Plan together with any future National or Regional Waste Management Plans. Additionally, ensure national policies and regulations regarding waste are adhered to.</p> <p>Encourage waste prevention, minimisation, reuse, recycling and recovery as methods of managing waste.</p> <p>Promote the development of sufficient energy resources to meet the needs of the plan area and promote the use of renewable energies to meet those needs.</p> <p>Protect the hydrological environment from adverse effects of the wastewater discharges by ensuring that there is suitable wastewater treatment to meet demands before discharge to the environment.</p> <p>Promote the development of sustainable transportation infrastructure where considered feasible.</p>

6 Monitoring

Article 10 of the SEA Directive requires that monitoring should be carried out in order to identify at an early stage any unforeseen adverse impacts associated with the implementation of the Naas LAP 2021-2027.

A monitoring programme has been developed based on the indicators (noted in Section 4.2) in order to track progress towards achieving strategic environmental objectives and reaching targets, enabling positive and negative impacts on the environment to be measured.

The indicators have been developed to illustrate changes that would be attributable to the implementation of the Naas LAP 2021-2027. The monitoring programme is presented in Table 6.1.

Kildare County Council is responsible for collating existing relevant monitored data, the preparation of preliminary and final monitoring evaluation reports, the evaluation reports, the publication of these reports and, if necessary, the carrying out of corrective action.

Table 6.1: Proposed Monitoring Measures

Objectives	Targets	Indicators	Monitoring Source	Monitoring Frequency and Responsibility
SEO 1 Biodiversity				
<p>SEO 1.1 Protect, conserve, enhance where possible and avoid loss of diversity and integrity of the broad range of habitats, species and wildlife corridors.</p> <p>SEO 1.2 To support achievement of the conservation objectives of European Sites (SACs and SPAs) and other sites of nature conservation.</p> <p>SEO 1.3 Conserve and protect other sites of nature conservation including NHAs, pNHAs, National Parks, Nature Reserves, Wildfowl Sanctuaries as well as protected species outside these areas as covered by the Wildlife Act.</p> <p>SEO 1.4 To minimise and, where possible, eliminate threats to biodiversity including invasive species.</p>	<p>SET 1.1 Siting of development of infrastructure installation on non-sensitive sites.</p> <p>SET 1.2 Maintenance of favourable conservation status for all habitats and species protected under the Habitat Directive.</p> <p>SET 1.3 No loss of protected habitats and species during the lifetime of the Plan.</p> <p>SET 1.4 No significant ecological networks or parts thereof which provide functional connectivity for SAC/SPAs to be lost without remediation resulting from development provided for by the LAP.</p>	<p>SEI 1.1 Number and extent of Designated Sites.</p> <p>SEI 1.2 Achievement of favourable conservation status of designated sites.</p> <p>SEI 1.3 Population and range of Designated Species.</p> <p>SEI 1.4 Achievement of the Objectives of Biodiversity Plans and County Development Plans.</p>	<ol style="list-style-type: none"> Monitoring of the effects of capital investment project development required under separate processes (EIA, AA) Department of Arts, Heritage and the Gaeltacht report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive The Status of EU Protected Habitats and Species in Ireland Report (Department of Culture, Heritage and the Gaeltacht) Monitoring related to other relevant Local Area Plans and County/City Development Plans EPA State of the Environment Report 	<ol style="list-style-type: none"> In accordance with the monitoring provisions of EIA/AA Department of Arts, Heritage and the Gaeltacht- every 6 years Department of Culture, Heritage and the Gaeltacht. Every 6 years. In accordance with the monitoring provisions of the lower level plans EPA. Every 4 years.
SEO 2 Population and Human Health				
<p>SEO 2.1 Protect, enhance and improve people's quality of life through energy provision.</p>	<p>SET 2.1 Minimise population exposure to high levels of noise, vibration and air pollution.</p>	<p>SEI 2.1 Census population data;</p> <p>SEI 2.2 % increase in housing (number and type).</p> <p>SEI 2.3 Changes in trends in perceived health status.</p>	<ol style="list-style-type: none"> Monitoring of the effects of capital investment project development required under separate processes (EIA, AA) 	<ol style="list-style-type: none"> In accordance with the monitoring provisions of EIA/AA CSO, results published every new Census year (6 years)

Objectives	Targets	Indicators	Monitoring Source	Monitoring Frequency and Responsibility
<p>SEO 2.2 Protect human health from hazards or nuisances arising from incompatible development.</p> <p>SEO 2.3 Provide all of the energy services required to sustainably meet future housing demands.</p> <p>SEO 2.4 To minimise the proximity of development to concentrations of population and to mitigate potential effect of development in order to reduce actual and perceived environmental effects.</p>	<p>SET 2.2 No significant deterioration in human health as a result of environmental factors.</p> <p>SET 2.3 No spatial concentrations of health problems arising from environmental factors.</p> <p>SET 2.4 Maintenance of gas supply to meet the energy needs of the population, while commencing a shift towards renewable energy use.</p>		<p>2. CSO Population and Gas Consumption Data</p> <p>3. Monitoring related to other relevant Local Area Plans and County/City Development Plans or RSEs</p>	<p>3. In accordance with the monitoring provisions of the lower-level plans.</p>
SEO 3 Land & Soil				
<p>SEO 3.1 Conserve, protect and avoid loss of diversity and integrity of designated habitats, geological features, species or their sustaining resources in designated ecological sites.</p>	<p>SET 3.1 Prevent pollution of soil through adoption of appropriate environmental protection procedures during construction, installation and maintenance works on site.</p> <p>SET 3.2 No incidences of soil contamination.</p> <p>SET 3.3 Ensure appropriate management of existing contaminated soil in accordance with the requirements of current waste legislation.</p>	<p>SEI 3.1 Incidences of soil contamination.</p> <p>SEI 3.2 Rates of re-use/recycling of construction waste.</p> <p>SEI 3.3 Rates of brownfield site and contaminated land reuse and development.</p> <p>SEI 3.4 Rates of greenfield development.</p>	<p>1. Monitoring of the effects of capital investment project development required under separate processes (EIA, AA)</p> <p>2. CORINE mapping resurvey</p> <p>3. EPA State of the Environment Report.</p> <p>4. EPA National Waste Statistics</p> <p>5. Monitoring related to relevant Local Area Plans and County/City Development Plans or RSEs</p>	<p>1. In accordance with the monitoring provisions of EIA/AA.</p> <p>2. European Community (EC) Varies.</p> <p>3. EPA, every 4 years.</p> <p>4. EPA, varies.</p> <p>5. In accordance with the monitoring provisions of the lower-level plans.</p>
SEO 4 Water				
<p>SEO 4.1 Maintain or improve the quality of surface water and groundwater (including estuarine)</p>	<p>SET 4.1 Support the achievement of “good” ecological and chemical status/potential of waterbodies by</p>	<p>SEI 4.1 Compliance of surface and ground waters with national and international standards.</p>	<p>1. Monitoring of the effects of capital investment project</p>	<p>1. In accordance with the monitoring provisions of EIA/AA</p>

Objectives	Targets	Indicators	Monitoring Source	Monitoring Frequency and Responsibility
to status objectives as set out in the Water Framework Directive (WFD). SEO 4.2 Support achievement of the requirements of the Water Framework Directive and implementation of the National River Basin Management Plan'	2015 in accordance with the Water Framework Directive. SET 4.5 Not to cause deterioration in the status of any surface or ground water or affect the ability of any surface or ground water to maintain or achieve 'good' status.	SEI 4.2 Achievement of the Objectives of the River Basin Management Plan.	development required under separate processes (EIA, AA) 2. EPA Water Quality Status for surface and ground water 3. EPA Risk Status for surface and ground water 4. EPA water quality monitoring	2. EPA, varies 3. EPA, varies 4. EPA, continuous
SEO 5 Air & Noise				
SEO 5.1 To support the protection of ambient environment through the implementation of European, national and regional policy and legislation relating to air quality, greenhouse gases, climate change, light pollution noise pollution and waste management.	SET 5.1 Maintain ambient air quality. SET 5.2 Minimise air and noise emissions during construction and operation of new developments.	SEI 5.1 Air quality indicators- National and region-specific emission data. SEI 5.2 Compliance with national standards.	1. Monitoring of the effects of capital investment project development required under separate processes (EIA, AA) 2. EPA Air Quality Monitoring 3. EPA State of the Environment Report 4. EPA Air Quality in Ireland Report 5. Monitoring related to other relevant Local Area Plans and County/City Development Plans or RSEs – such as noise action plans	1. In accordance with the monitoring provisions of EIA/ AA 2. EPA, continuous 3. EPA, every 4 years 4. EPA, annually 5. In accordance with the monitoring provisions of the lower-level plans
SEO 6 Climate and Resilience				
SEO 6.1 Comply with relevant national climate change targets e.g. Ireland's Climate Action and Low Carbon Development Act 2015, the and EU 2030 and 2050 Emissions and Renewable Energy Targets and the Paris Agreement Targets.	SET 6.1 Achieve a reduction in greenhouse gas emissions. SET 6.2 Increase the amount of gas from renewable sources that is introduced to the network. SET 6.3 Growth in the level of fuel switching from high-carbon	SEI 6.1 Levels of greenhouse gas emissions. SEI 6.2 Number of energy/renewable energy production facilities. SEI 6.3 Rates of energy/renewable energy consumption.	1. Monitoring of the effects of capital investment project development required under separate processes (EIA, AA) 2. EPA State of the Environment Report 3. Monitoring related to other relevant Local Area Plans and County/City Development Plans or RSEs	1. In accordance with the monitoring provisions of EIA/ AA 2. EPA, every 4 years 3. In accordance with the monitoring provisions of the lower level plans 4. EPA, varies 5. EPA, varies

Objectives	Targets	Indicators	Monitoring Source	Monitoring Frequency and Responsibility
SEO 6.2 To support implementation of the National Climate Action Plan 2019	fuels to gas, in both heating and transport. SET 6.4 Promote minimisation of greenhouse gas emissions to the atmosphere. SET 6.5 To achieve a 30% reduction on GHG emission levels (compared with 2005 levels) by 2030.		4. EPA climate change projections 5. EPA Greenhouse Gas emissions data 6. Monitoring related to Climate Adaptation or Mitigation plans 7. Monitoring of groundwater levels by GSI under the GWClimate project	6. In accordance with the monitoring provisions of these plans 7. GSI, continuous
SEO 7 Archaeological, Architectural and Cultural Heritage				
SEO 7.1 Promote the protection and conservation of archaeological, architectural and cultural heritage, specifically those buildings identified on the Record of Protected Structures, and Recorded Monuments in Ireland.	SET 7.1 Maintenance and enhancement of archaeological heritage- including entries to the Record of Monuments and Places and unknown archaeology- and the context of the above within the surrounding landscape where relevant. SET 7.2 Maintenance and enhancement of entries to the Record of Protected Structures and/or their context within the surrounding landscape where relevant.	SEI 7.1 Achieving the objectives of development plans regarding heritage protection. SEI 7.2 full or partial loss to entries to the RPSs/NIAHs	1. Monitoring of the effects of capital investment project development required under separate processes (EIA, AA) 2. Monitoring related to other relevant Local Area Plans and County/City Development Plans or RSEs	1. In accordance with the monitoring provisions of EIA/AA 2. In accordance with the monitoring provisions of the lower-level plans
SEO 8 Landscape and Visual				
SEO 8.1 Ensure no significant disruption of historic/cultural landscapes and features. SEO 8.2 Ensure no significant visual impact from developments/installations.	SET 8.1 No avoidable significant impacts on the landscape resulting from development provided for by the LAP.	SEI 8.1 Range and extent of Amenity Landscapes. SEI 8.2 Rates of development within designated landscapes. SEI 8.3 Rates of urban expansion.	1. Monitoring of the effects of capital investment project development required under separate processes (EIA, AA). 2. Monitoring related to other relevant Local Area Plans and	3. In accordance with the monitoring provisions of EIA/AA 4. In accordance with the monitoring provisions of the lower-level plans

Objectives	Targets	Indicators	Monitoring Source	Monitoring Frequency and Responsibility
<p>SEO 8.3 Ensure no significant disruption of high landscape values.</p> <p>SEO 8.4 To support achievement of the objectives of the National Landscape Strategy</p>	<p>SET 8.2 Ensure development and infrastructure installations are sensitive to its surroundings.</p> <p>SET 8.3 Ensure no significant disruption of historic/cultural landscapes and features.</p>	<p>SEI 8.4 % change of land use from rural to urban.</p>	<p>County/City Development Plans or RSEs.</p> <p>3. CORINE mapping resurvey</p>	<p>5. European Communities (EC), varies</p>
SEO 9 Material Assets				
<p>SEO 9.1 Make best use of existing infrastructure and phase the significant future growth of Ireland in line with the capacity and delivery of the sustainable development of new physical infrastructure.</p> <p>SEO 9.2 Promote use of renewable energy sources and support energy conservation initiatives including the development of low carbon business practices and buildings.</p> <p>SEO 9.3 Minimise effects upon the existing and planned infrastructure.</p>	<p>SET 9.1 High levels of energy demand growth are accommodated.</p> <p>SET 9.2 Secure and competitive supplies of gas and are maintained.</p> <p>SET 9.3 Increase in renewable energy developments.</p> <p>SET 9.4 To achieve a 30% reduction on GHG emission levels (compared with 2005 levels) by 2030.</p> <p>SET 9.5 Improve efficiencies of energy infrastructure.</p>	<p>SEI 9.1 Location/level of infrastructure.</p> <p>SEI 9.2 Achievement of development plan objectives.</p> <p>SEI 9.3 No. of renewable energy developments granted planning permission.</p>	<p>1. Monitoring of the effects of capital investment project development required under separate processes (EIA, AA).</p> <p>2. Monitoring related to other relevant Local Area Plans and County/City Development Plans or RSEs.</p> <p>3. CSO Population and Gas Consumption Data</p>	<p>1. In accordance with the monitoring provisions of EIA/AA</p> <p>2. In accordance with the monitoring provisions of the lower-level plans</p> <p>3. CSO, every 6 years</p>

7 Final Appraisal: How Environmental Considerations were integrated into the Adopted LAP

This Section summarises how environmental considerations were integrated into the adopted Naas LAP, throughout the SEA process.

Identification of environmental constraints

As described in Section 4.1, the SEA team undertook an assessment of baseline environmental conditions of the LAP area, with reference to biodiversity, population and human health, land and soil, water, air and climate, heritage, landscape and material assets. This information was used to focus the SEA objectives, develop alternatives and assess positive and negative impacts associated with the implementation of the proposed LAP. An Environmental Sensitivity Map was prepared to enable this assessment and to influence alternatives discussions and assessment of policies.

SEA Scoping

As described in Section 3, the SEA Scoping was a key part of the assessment process as it provided information to allow consultation with defined statutory bodies and environmental authorities on the scope and level of detail to be considered and incorporated at an early stage in the assessment.

Assessment of alternatives

The environmental baseline and objectives were used to identify key sensitivities and inform development of the alternatives and ultimately the assessment of the preferred alternative.

Assessment of Plan Provisions

As outlined in Section 4.5, a detailed environmental assessment was carried out of the plan provisions in order to determine, and illustrate to KCC, the potential for significant negative effects as a result of implementing the plan, as it was then proposed.

Proposed mitigation measures

Mitigation measures were proposed to address negative environmental impacts identified during the assessment process. These included amendments to the wording of policies and objectives in the Naas LAP.

Required environmental monitoring programme

A monitoring programme has been developed based on the indicators (noted in Section 6) in order to track progress towards achieving strategic environmental objectives and reaching targets, enabling positive and negative impacts on the environment to be measured.

The indicators have been developed to illustrate changes that would be attributable to the implementation of the Naas LAP 2021-2027.

Consultation

Further to the SEA Scoping consultation, the SEA Environmental Report, the Report for the purposes of AA Screening the Draft Naas LAP, and the proposed material alterations to the Draft LAP were put on wider display on the Kildare County Council website. All changes to policies and actions have been screened by the SEA and AA teams to determine if they would result in significant effects, and all submissions and objections received were reviewed

Appendix A

SEA Scoping Report- Submission Responses

Table A1: SEA Scoping Report- Response to Submissions

Consultee/ Stakeholder	SEA Scoping Response	SEA Action
Department of Communications, Climate Action & Environment on behalf of Inland Fisheries Ireland (IFI)	<ol style="list-style-type: none"> 1. IFI should be contacted in relation to all works that may have an impact on surface waters, at formal planning stage. 2. Recommended to recognise in planning systems (local area planning, town planning, individual application assessment etc.) surface waters and their riparian areas as key natural habitats inherently supporting significant floral and faunal biodiversity 3. Recommended that County Development Plan, Town Plan and Local Area Plan objectives include retention of open and natural channels 4. Development potentially impacting aquatic habitats should be strictly controlled to ensure ecological protection and enhancement. 5. The council should seek to establish riparian corridors free from development along all significant watercourses. 6. IFI advocates at least a 10m buffer zone between river channel and the line of maximum extent of development. 7. The implementation of a SUDS design for surface water disposal in any areas of increased urbanisation is a positive indicator of the Council's intention for the sustainable development of the area and should, in conjunction with good management of the site, aid in flooding and pollution management. Policies and recommendations made under the Greater Dublin Strategic Drainage Study (GSDSDS) should be applied in development of a drainage strategy for the County. 8. IFI's policy is to maintain watercourses in their natural open state in order to prevent habitat loss, maintain or enhance biological diversity value and aid in pollution detection. However, when culverts have been installed it must be highlighted that ongoing maintenance is essential to keep these structures debris-free which in turn allows for the free movement of salmonid species as is required under the Fisheries Acts. 9. While Osberstown WWTP has recently been upgraded to final treatment capacity of 130,000 PE, it is important to note that sufficient treatment capacity must be available both within the receiving sewerage system locally and downstream at Osberstown WWTP over the full duration of the plan in order that the ecological integrity of the ultimate receiving water (River Liffey) is protected. 10. IFI would highlight the 'at risk' status of most surface waters in the Naas area under the WFD characterisation process and would stress the availability of IFI's full cooperation in order to protect and enhance water and habitat quality in all surface waters within the broad WFD context. 11. Consideration of protected, vulnerable and sensitive (such as Brown trout) aquatic species should be a priority when formulating the new LAP it is vital to note that salmonid waters constraints apply to any development in the catchment areas surrounding Naas (The River Liffey and local watercourses). 	<ul style="list-style-type: none"> • The consideration of aquatic ecology has formed a key part of the impact assessment process. • The implementation of SUDS is highlighted in the SEA ER by means of an objective. • The protection of all habitats/species within, and outside designated areas of the Plan is a key consideration taken into account in the preparation of the SEA ER. • The issue of climate change is a key concern considered in the preparation of the SEA ER.

Consultee/ Stakeholder	SEA Scoping Response	SEA Action
	<p>12. The issue of climate change should be comprehensively considered and integrated into the final Naas Local Area Plan.</p> <p>13. IFI’s key concern in relation to abstractions is that the sourcing of water supplies from groundwater or surface water resources must not result in a negative impact on the ecology. The Development Plan must address the need to meet WFD objectives for all surface waters in the region. All resulting policies should be informed by fisheries and other relevant legislation.</p> <p>14. The protection of habitats outside designated areas and a Council commitment to reject proposals that would interfere with natural floodplains would greatly benefit both aquatic and riparian features in the surrounding areas. IFI is strongly opposed to any development on natural floodplain lands.</p>	
EPA	<ol style="list-style-type: none"> 1. In considering additional zoning/development and growth of settlements within the Plan area, it is critical that development be closely linked to the ability to provide a safe and secure supply of drinking water and related critical service infrastructure. It is recommended to include a commitment to collaborate with Irish Water and other relevant stakeholders in the Plan, to provide an adequate and appropriate drinking water supply. 2. An Objective/Policy promoting the need for the conservation of water resources and also the need for detection/mitigation of infrastructural leakages should be included with consideration to developing a Water Conservation Strategy. 3. The need to provide and maintain adequate and appropriate wastewater treatment infrastructure to service zoned lands and developments over the lifetime of the Plan. 4. Issues of poorly performing treatment plants, and measures to ensure that combined storm water overflows, sewers and trade effluent in the area covered by the Plan is also managed properly should be included as appropriate. 5. Clear commitments should be provided in the Plan to protect surface water, groundwater and coastal/estuarine resources and their associated habitats and species, including fisheries within and adjacent to the Plan area. 6. Clear objectives supporting the quality of water in individual water bodies, within the Plan area as set out in the existing relevant Water Framework Directive and River Basin Management Plan, is protected/improved and maintained. 7. A clear Policy / Objective should be included for the protection of groundwater resources and associated habitats and species integrating any existing Groundwater Protection Schemes and Groundwater Source Protection Zones, as relevant and appropriate within the Plan area, and a commitment to comply with the European Communities Environmental Objectives (Groundwater) Regulations 2010 (S.I. No. 9 of 2010). 8. An obligation to protect bathing waters within (and adjacent to) the Plan area should be reflected. 9. Any sites of significant biodiversity value within or adjacent to the Plan area listed on the Water Framework Directive Register of Protected Areas, (such as Fresh Water Pearl Mussel Catchments, designated Salmonid waters, fisheries / shellfisheries), should be protected in preparing the Plan. 	<ul style="list-style-type: none"> • Issues of water resources, water/wastewater treatment, and surface and groundwaters are taken into consideration in the SEA. This includes the improvement of existing water resources and infrastructure with consideration given to the protection of biodiversity in the plan area. • The River Basin Management Plan for Ireland 2018-2021 and Water Framework directive (WFD) have been taken into account in the preparation of the SEA and integrated into this Environmental Report. • The SEA ER has been prepared with reference to the European Communities Environmental Objectives (Groundwater) Regulations 2010 (S.I. No. 9 of 2010). • The SEA ER has been prepared in compliance with The Planning System and Flood Risk Management – Guidelines

Consultee/ Stakeholder	SEA Scoping Response	SEA Action
	<p>10. The Plan and SEA should be in full compliance with The Planning System and Flood Risk Management – Guidelines for Planning Authorities (OPW/DEHLG, 2009) and ensure that development within the Plan area is appropriate to the risk of flooding identified and that vulnerable land uses are avoided in flood zone A/B areas where possible</p> <p>11. The Plan should promote appropriate flood risk assessments to be undertaken, where development / zoning is being proposed in the Plan area where there is significant risk of flooding and consider, where appropriate, adaptation measures to account for the likely increased risk of flooding due to climate change within the Plan area, including implementation of adequate and appropriate Sustainable Urban Drainage Systems. Additionally, the Plan should provide for protection, management, and as appropriate, enhancement of existing wetland habitats where flood protection/management measures are necessary. Integrated Coastal Zone Management should also be considered as relevant and appropriate.</p> <p>12. Climate change adaptation and mitigation measures should be included in the Plan as appropriate and the Plan should be consistent with the National Policy Position on Climate Action and Low Carbon Development1, the National Climate Action Plan 2019, the National Mitigation Plan and the National Adaptation Framework, as well as relevant sectoral, regional and local adaption plans.</p> <p>13. Reflect the need to reduce greenhouse gas emissions and to protect, maintain and enhance carbon stocks. Relevant actions in The National Mitigation Plan (NMP) should be integrated into the Plan as appropriate</p> <p>14. The Plan should include appropriate climate change adaptation measures that can be implemented either directly or through relevant land use plans and/or specific plans e.g. Flood Risk Management Plans, Integrated Coastal Zone Management Plans etc.</p> <p>15. The Plan and SEA should consider monitoring for both climate mitigation and climate adaptation monitoring aspects, where relevant and appropriate.</p> <p>16. Air quality legislation in Ireland highlights the need “to avoid, prevent or reduce harmful effects on human health and the environment as a whole”. In addition, it requires that Local Authorities where appropriate “shall promote the preservation of best ambient air quality compatible with sustainable development.”. These requirements should be incorporated by means of a specific plan objective / policy. The pollutants of most concern are those whose main source is traffic such as Particulate Matter and Nitrogen Dioxide should to be taken into account.</p> <p>17. The objectives of EU and Irish noise legislation is “to avoid, prevent or reduce harmful effects on human health and the environment as a whole”, and this includes noise nuisance, this requirement should be complied with. Consideration should also be given to protect, where relevant, any designated quiet areas in open country.</p> <p>18. The Plan should promote the integration of land use zoning and development to existing and planned availability of waste infrastructure and capacity. The Plan should also refer to and incorporate the relevant aspects of the relevant Regional Waste Management Plan, and relevant EPA reports.</p>	<p>for Planning Authorities (OPW/DEHLG, 2009)</p> <ul style="list-style-type: none"> • The SEA ER has been prepared with consideration given to the National Policy Position on Climate Action and Low Carbon Development, the National Climate Action Plan 2019 and the National Adaptation Framework. • Climate change mitigation and monitoring measures are considered in the SEA. • Air and noise pollution are addressed in the SEA. • The SEA has been prepared with particular consideration of pollutants such as Particulate Matter, Nitrogen Dioxide, and Radon • Waste infrastructure and capacity is addressed in the SEA with regard to the relevant aspects of the Eastern-Midlands Regional Waste Management Plan, and relevant EPA reports • Considerations for the protection of ecological resources and all aspects of biodiversity is a key aspect considered in the SEA • The Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change

Consultee/ Stakeholder	SEA Scoping Response	SEA Action
	<p>19. Where significant concentrations of radon occur within the Plan area, these should be taken into account in the Plan or associated development control measures.</p> <p>20. The protection of ecological resources is a key consideration which needs to be addressed. While also promoting the need to protect wider aspects of biodiversity including ecological corridors / linkages / green infrastructure, areas of important local biodiversity, the provision of buffer zones between developments and areas of significant biodiversity and ensuring appropriate control and management measures for invasive species.</p> <p>21. When considering energy conservation / renewable energy aspects of the Plan, where relevant, the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (DHPCLG, 2017) should be taken into account.</p> <p>22. The relevant renewable energy / energy conservation actions in the National Mitigation Plan should be integrated. Additionally, the Plan should, where relevant, include a commitment to prepare and implement an ‘Energy Conservation Strategy’ and associated awareness campaign within the lifetime of the Plan where feasible.</p> <p>23. Promote the need for energy conservation measures to be incorporated into buildings.</p> <p>24. Considerations for the protection of designated scenic landscapes, scenic views, scenic routes and landscape features of national, regional, county and local value. The Plan should also take into account the landscape character adjoining the Plan area.</p> <p>25. The Plan should protect any designated Geological and Geomorphological NHAs/pNHAs, which may be present/designated within or adjacent to the Plan area in consultation with the Geological Survey of Ireland.</p> <p>26. The Plan should ensure provision of adequate and appropriate infrastructure and to serve both the existing community and likely future predicted increases in population within the Plan area</p> <p>27. The Plan should promote and as appropriate, provide for the provision of sustainable modes of transport</p> <p>28. Where zoning/rezoning of lands and the introduction of new development is being proposed within the Plan area, consideration should be given to the need for an integrated planning approach to service any development proposed and authorised during the lifetime of the Plan in collaboration with key stakeholders, while supporting and promoting the provision of adequate and appropriate critical service infrastructure, surface and storm water drainage, public transport, waste management, community services and amenities etc. on a planned and phased basis.</p> <p>29. It should be highlighted that, under the EIA and Planning & Development Regulations, certain projects arising during the implementation of the Plan may require an EIA.</p>	<p>(DHPCLG, 2017) have been taken into account where relevant in the SEA.</p> <ul style="list-style-type: none"> • Energy conservation and renewable energy are key considerations taken into account in preparation of the SEA. • Objectives to protect designated Geological and Geomorphological NHAs/pNHA are incorporated in the SEA. • Adequate infrastructure and sustainable transport for existing and future use are assessed in the SEA. • The requirement of an Environmental Impact Assessment for certain projects arising over the lifetime of this plan is considered in the SEA.

Appendix B

SEA Environmental Report- Response to Submissions on the Draft Plan

Note - Appendix B Table B2 contains a summary of those submissions received which relate to the SEA only. Some 883 No. submissions were received in total on the Draft Plan, as listed in Table B1.

Table B1: Submissions Received on Draft LAP and SEA Environmental Report

No.	Name	No.	Name/Organisation
1	Environmental Protection Agency	48	Kevin Phelan
2	Department of Environment, Climate and Communications - WasteManagement Unit	49	Letitia Foley
3	Transport Infrastructure Ireland	50	Ann Crowley
4	Department of Transport	51	Harry McAdam
5	Eastern & Midland Regional Assembly	52	Genevieve McAdam
6	Health Service Executive -Environmental Health	53	Yvonne Mooney
7	Office of Public Works	54	Raymond Keaney
8	National Transport Authority	55	John Dowling
9	Office of the Planning Regulator	56	Karen McCarthy
10	Irish Water	57	Deirdre Vallely
11	Department of Education	58	Liam & Angela O'Brien
12	Department of Tourism, Culture, Arts, Gaeltacht, Sport & Media	59	Christopher Butler
13	M Murphy	60	Siobhan Boran
14	Brian McAdam	61	Aimee O'Beirne
15	Ross McCarthy	62	Seamus MacGabhann
16	Joanne Pender	63	Paul Murphy
17	R Burke	64	Ciara MacGabhann
18	Noel Geary	65	Deirdre Vallely
19	Diarmuid Moran	66	Brian Byrne
20	Ross McCarthy	67	Libera Kavanagh
21	Jacqueline Howley	68	Grainne McGee
22	Riognagh Bracken	69	Michael Corrigan
23	Dwayne O'Connor	70	Frances O'Loughlin
24	Brian Young	71	John Hughes
25	Diarmuid Moran	72	Catherine Corrigan
26	Anthony McAllister	73	Carol Frost
27	Bill Enright	74	Ciaran O'Loughlin
28	Maria Grogan	75	Eddie Lenehan
29	Ronan Joyce	76	Sheelagh Pentony
30	James Donnell	77	Dermot Ryan

No.	Name	No.	Name/Organisation
31	Joseph O'Beirgín	78	James Foley
32	David Egan	79	Deirdre Vallely
33	Bryong Egan	80	Yvonne Codd
34	John Coyne	81	Mark Domican
35	Bernadette Coyne	82	Joseph Byrne
36	R Downey	83	Sheila Byrne
37	Libera Kavanagh	84	Claudia Stone
38	Luke Freeley	85	Avril Lysiak
39	Paul Farrell	86	Simon Sparrow
40	Fiona Maguire	87	Colin Burke
41	R. Downey	88	Deirdre Curtin
42	Gerald Kehoe	89	Mill Lane Residents Association
43	Alistair Conway	90	Ronan Quinlan
44	Frank Butler	91	Moira Walsh
45	Barry McCarthy	92	Fitzpatricks Garage
46	Deirdre O'Neill	93	Gerard Donegan
47	Brendan Kelly	94	Fergus Barry
95	Kathleen Moran	143	Tom Gallagher
96	John Kehoe	144	Ronan Elliffe
97	Marian Stapleton	145	Helena Hearne
98	Nicola Gardiner	146	Chris Bergin
99	Pat Breen	147	Granis McElligott
100	Bogdan Stef	148	Kevin O'Neill
101	E O'Loughlin	149	Yvonne Colclough
102	Niall Purcell	150	Anne Cosgrave
103	Aine Kilduff	151	Andrew McCudden
104	Sean Roche	152	Joan Finn
105	Aidas Cereska	153	Ailbhe Gallagher
106	Leanne Bright	154	Carmel Gallagher
107	Philip Bonner	155	Miriam Cushen
108	Zuzanna Ekiert	156	Jackie Ronan
109	Orlath Cahalan	157	Geraldine Fitzpatrick
110	Ruth Loughlin	158	Vincent Kearns
111	Bill McGrath	159	Craddockstown Way, Rise and Park Residents Association
112	Mark McDaid	160	Ruth Neylon
113	Stephen Ryan	161	Lisa Murphy
114	Liz O'Toole	162	Willi Curran

No.	Name	No.	Name/Organisation
115	Maria Hutchin	163	Edmund Murphy
116	Aisling & Anthony McCormack	164	Mark Neylon
117	Tom Coyle	165	Burke Family
118	John Kinchella	166	Reid Family
119	Rinske Wassenaar	167	John McNally
120	Keith Proctor	168	Jane Durkan
121	Marina Trishschenko	169	David Boyse
122	Marzena Kelleher	170	Vincent Byrne
123	Shane Blake	171	M Gleeson
124	Mike O'Halloran	172	Sinead Prout
125	C E Mooney	173	Orla Mather
126	Brid Ryan O'Malley	174	Norma Fitzpatrick
127	David Proctor	175	Thornbrook Residents Association
128	Joan Proctor	176	Yvonne Clarke
129	Mary Byrne	177	Andy Ellard
130	Darragh Mulligan	178	Michelle O Rafferty
131	Meath County Council	179	Niall Andrews
132	Claire O'Shea	180	Yvonne McCormick
133	Ursula Ellard	181	Joanne Finnegan
134	Stephen Power	182	Roisin Stewart
135	Niamh Floyd	183	Breda Andrews
136	Cormac Ahern	184	Sonya Hillis
137	Orla Ahern	185	Kevin Greene
138	Mary Garrick	186	Daniel McTiernan
139	Christopher Foley	187	Kevin Greene
140	Greg Hanlon	188	Annette Fadian
141	Gillian Quinn	189	Alan Stewart
142	Kingsfurze Avenue Residents	190	Emma Fadian
191	Sarah Fadian	239	John Murray
192	Aisling Byrne	240	Joanna O'Byrne
193	Aoife Byrne	241	Paula Edgeworth
194	Carol Byrne	242	Ellen Creighton
195	Lynn Sparrow	243	Lidon Group
196	Olivia Allen	244	Brian Clohessy
197	Hugo Devine	245	Lidon Group
198	Steven Fadian	246	Tanya Sweeney
199	Peter & Janet Conran	247	Alessandra Cesari

No.	Name	No.	Name/Organisation
200	Robert Kennedy	248	Sean O'Connor
201	Frank Fogarty	249	Michael Meehan
202	Adrian Travers	250	Liz Melia
203	Ian d'Alton	251	Thomas Size
204	Fiona Masterson	252	Lena Lenehan
205	Carmel Geissel	253	Joe McWilliams
206	Adrian Geissel	254	Liz Dempsey
207	Sundays Well Res Assc	255	Frank Butler
208	Rathasker Heights Res Assc	256	Joan O'Dwyer
209	Paula Laffan	257	Meadbh Gallagher
210	Lidon Group	258	Hollywood Projects Ltd
211	Gerard Madden	259	Louise Donnelly
212	Brian Kavanagh	260	Castlekeel Ltd.
213	Fiona & Cathal Carville	261	Jim O'Sullivan
214	Céire Walsh	262	Lorraine Benson
215	Tony Maher	263	Ruth & John Moloney
216	Gavin McDermott	264	Inland Waterways Association
217	Simon Thomas	265	Gerard Burns
218	Andrew Shirley	266	Mary Taaffe
219	Doris Whelehan	267	Patrick Murphy
220	Karen Donoghue	268	Majella O'Keeffe
221	Alan Byrne	269	Rebecca Francis
222	Paddy Travers	270	John Walsh
223	Linda McDonald	271	Jim Gallagher
224	Emily O'Reilly	272	Donal Higgins
225	Niall Gallagher	273	Colm Reid
226	Valerie Lemoisson Amand	274	James Finn
227	Elizabeth Urell	275	Fergal Gordon
228	David Muldoon	276	Mary Gordon
229	Rachel McDonald	277	James Byrne
230	Brendan Kenny	278	Donal Bergin
231	Liam C	279	John Kelly
232	Mark Noonan	280	Aoife O'Donoghue
233	Anthony Gallagher	281	Naas GAA
234	Sarah Flynn	282	David Martin
235	Camilla Foley	283	Amy Behan
236	Christine O'Sullivan	284	Sarah Freeley

No.	Name	No.	Name/Organisation
237	Claire Meehan	285	Jigginstown Green Residents Association
238	Paddocks Residents Association	286	Darren Lynch
287	Eoghan Redmond	335	Alan Cunniffe
288	Padraig Redmond	336	Eva Walsh
289	CM Redmond	337	Evan Travers
290	Michelle Blake	338	Claire Walsh
291	Ivan Codd	339	Diarmuid Moran
292	Gerald Kehoe	340	John Johnson
293	Yvonne Codd	341	Brian O'Reilly
294	Louise Lynch	342	Davida Hulse
295	Donal Bergin	343	Emma Little
296	Cill Dara Le Gaeilge	344	James Fleming
297	Leo Clancy	345	Marion Rackard
298	Origin Enterprises PLC	346	DSV
299	Michael O'Brien	347	Phoebe Dillane
300	Dee Scallan	348	Brian O'Reilly
301	Annmarie Johnson	349	Peter Kelly
302	Anthony McAllister	350	Tracy Dwyer
303	Sheila Kavanagh	351	Aonghus Dillane
304	Kay McKenna	352	Birdwatch Ireland (Kildare Branch)
305	Ger Prenderville	353	Spring Gardens Residents' Association
306	Mark Graham	354	Liz Donohue
307	Geraldine Faherty	355	Liebherr Construction Equipment Ltd.
308	Fiona Maguire	356	Eimear Freeley
309	St. David's Church (Rev. Heak)	357	Colivet Family
310	Ruth Brennan	358	Colin O'Rafferty
311	Diarmuid Parker	359	Cllr Bill Clear
312	S. Clancy	360	Treacy Group
313	Matthew Kelly	361	Sanctuary Landscapes Limited
314	Maire Greevey	362	Alan Byrne
315	Stephanie McClintock	363	Brendan Kenny
316	A Hennessy	364	Fiona Duigan
317	County Kildare Chamber	365	Joanna O'Byrne
318	Diarmuid Parker	366	John Callaghan
319	Alan Devine	367	Cormac Ahern
320	Roche Group	368	Helen O'Leary
321	Swans on the Green	369	Yvonne Masters

No.	Name	No.	Name/Organisation
322	Caitriona Callaghan	370	Anne Lawlor
323	Pat McCabe	371	Evelyn Hainsworth
324	H O'Connor	372	Desmond Murray
325	Leo Moore	373	John Byrne
326	Tony Gavin	374	Mishna Kowalczyk
327	Louise Hyland	375	Robert Finn
328	Aliyah Akano	376	Helen Coe
329	Kevin Greene	377	Mark Barrett
330	Mitu Rashid	378	Grace Keevans
331	Elma Flanagan	379	Enda Walsh
332	Ray O'Halloran	380	John Mulligan
333	Mary O'Halloran	381	Abbey Bridge and Canal Residents'
334	J Murphy	382	Oak Park Resident's Committee
383	John Kavanagh	431	Eamon Sinnott
384	John Collins	432	Landon Park Owners Management Company
385	Carraig O'scair Residents' Association	433	Liz Denieffe
386	Sheila Barrett	434	Roisin Leavey
387	Barbara Crawford	435	Rhonda Willoughby
388	Barbara Crawford	436	Alistair Conway
389	Corey Murphy	437	Mary Roche
390	Bridget Armstrong	438	Audrey Leavey
391	Maura Lam	439	Kings Court Residents Association
392	Tricia Deegan	440	Joan Moran
393	Paul Crawford	441	Catherine Barry
394	Mary Phelan	442	Marie O'Neill
395	June Galligan	443	Sult na Sollan
396	Dave Shanahan	444	Social Democrats
397	Sharon Plant	445	Linda Doyle
398	Rosemarie Sheehan	446	Belmont Data Centres
399	John Lennon	447	Liam Grogan
400	Anthony Cross	448	Clyde Doyle
401	Orla Coleman	449	Marc Rogers
402	Christine Murray	450	Helen Coe
403	CJ Cullen	451	Jennifer Murphy
404	Fiona Lennon	452	Conor Winchcombe
405	Gail Mooney Collins	453	Declan Hayden
406	Daragh McKevitt	454	Mary Roche

No.	Name	No.	Name/Organisation
407	Richard Bridge	455	Brid Ryan O'Malley
408	Gráinne Duffy	456	Queally Group
409	Trevor Cowdell	457	Sherry Fitzgerald O'Reilly
410	John Lennon	458	Niamh Cowdell
411	Conor Ó Mathúna	459	Fiona Uyema
412	Anne-Marie Freeley	460	Ian Folan
413	Declan McCormack	461	PJ McLoughlin
414	Derek O'Reilly	462	Alan Hyland
415	Elaine NiEochaidh	431	Eamon Sinnott
416	Ruairí Ó hAilín	432	Landon Park Owners Management Company
417	Paula Somers-Kennedy	433	Liz Denieffe
418	Marie Daly	434	Roisin Leavey
419	Derek O'Reilly	435	Rhonda Willoughby
420	Ed Behan	436	Alistair Conway
421	Steven Laverty	437	Mary Roche
422	Michael Carroll	438	Audrey Leavey
423	Colm Byrne	439	Kings Court Residents Association
424	Anne Marie Murray	440	Joan Moran
425	Robert Harrington	441	Catherine Barry
426	Hillside Drive Residents Association	442	Marie O'Neill
427	Kevin Greene	443	Sult na Sollan
428	Suzanne Murphy	444	Social Democrats
429	Kevin Maher	445	Linda Doyle
446	Belmont Data Centres	494	Alan Hyland
447	Liam Grogan	495	Shane Colclough
448	Clyde Doyle	496	Niamh Cowdell
449	Marc Rogers	497	Apple Green Service Areas Limited
450	Helen Coe	498	Venturis Investment Group
451	Jennifer Murphy	499	Niamh Parlon
452	Conor Winchcombe	500	Deirdre Parlon
453	Declan Hayden	501	Cllr Bill Clear
454	Mary Roche	502	Cllr Carmel Kelly
455	Brid Ryan O'Malley	503	Irene O'Neill
456	Queally Group	504	Millenium Properties Partnership Limited
457	Sherry Fitzgerald O'Reilly	505	Eamon Sinnott
458	Niamh Cowdell	506	Crylock Developments LTD

No.	Name	No.	Name/Organisation
459	Fiona Uyema	507	Megan Victory
460	Ian Folan	508	Glenveagh Properties PLC
461	PJ McLoughlin	509	Elaine Haskins
462	Alan Hyland	510	Eithne Ní Fhlathartaigh
463	Andrew Murphy	511	James Lawless TD
464	Dominic Mullaney	512	M Fogarty
465	Mary Wren	513	Bernadette Mooney
466	Ali Asghar Ismail	514	Deirdre Desmond
467	Cairn PLC	515	Vonnie Murray
468	Caroline Holden	516	Emma Fitzgerald
469	Dawn Holden Walford Holden Walford	517	Claire Mahon
470	Elmwood Residents' Committee	518	Christine Murray
471	Liz Dunbar	519	Inland Waterways Association of Ireland
472	Caroline Holden	520	Ciaran Kelleher
473	Joseph O'Loughlin	521	Pamela Victory
474	Chris Conway	522	Tricia Madden
475	Dawn Holden Walford Holden Walford	523	Christine Murray
476	Sharyn McMenamin	524	Westar Group
477	David Buckley	525	Vincent Kelly
478	Michael Faherty	526	Kyran Hurley
479	Lynda Behan	527	Joan Branhall
480	Helen Coe	528	Bob Quinn
481	Tom McParland	529	Susan McGrath
482	Larchfield Park Nursing Home -Sara Dillon	530	Naas Access Group
483	Kyran Hurley	531	Una Murphy
484	Deirdre Parlon	532	David Monaghan
485	Naas Sports Group Management	533	Liam Greene
486	Novi-Welltel Group	534	Joseph O'Loughlin
487	Ann Gallagher	535	Gerard Byrne
488	Naas Town Team	536	Naas Tidy Towns
489	An Post	537	Gerry Madden
538	Thomas James Kinlogh	587	Niall O'Dowda
539	Joan Bramhall	588	Breffni Carpenter
540	Niamh Skelton	589	North Kildare Branch of Social
541	Margaret Greene	590	Rathasker Heights Residents Association

No.	Name	No.	Name/Organisation
542	Michael Skelton	591	Thomas James Kinlough
543	Kate McCoy	592	John Miley
544	Yvonne Gill	593	Sean Cunnie
545	Emer Hynan	594	Richard Godsil RPS
546	Evie Sammon	595	Alan Duncan
547	Jackie Madden	596	Brendan Colivet
548	Ballymore Group	597	North Kildare Branch Social Democrats
549	Geraldine Faherty	598	O'Reilly Family
550	Sean Murray	599	Edel Stewart
551	Colm Kenny	600	Christinah Jocklin
552	Conlon New Homes	601	Michael McElgunn
553	Declan Hayden	602	Anne and Larry Breen
554	Ben Doyle	603	Megan Breen
555	Ailbhe Greene	604	Michaela Piare
556	Tesco Ireland	605	Clr Anne Breen
557	IWAI Dublin	606	Francis & Stephanie Carolan
558	David McElroy	607	Hector Ritchie
559	Reada Cronin TD	608	John Ward
560	Elaine McHale	609	Declan Curry
561	Donal Corcoran	610	Jim & Rosemary Burse
562	Paul Sheridan	611	Kevin K Conroy
563	Ciara Hilliard	612	Mairin O'Malley Conroy
564	Gerard Victory	613	Caragh Court residents Association
565	Anthony Egan	614	Joseph Leonard
566	Brian Smyth	615	John Kehoe
567	Kate Victory	616	Pat and Mary Courtney
568	Donal Knight	617	Kevin G. Conroy
569	Jacinta Gale	618	Deirdre O'Connell
570	Joseph o'Loughlin	619	John O'Connell
571	Bernie Lardner	620	Kathleen Ward
572	Elaine Devine	621	Charles Carri
573	Naas Rugby Football Club	622	Ruby Gould
574	Conor Clavin	623	Lorna and Mark Walsh
575	Ciara Breen	624	James and Mary Geraghty
576	Debby Bernadette	625	Cormac O'Donovan
577	Thomas James Kinlough	626	Joe O'Donovan
578	Noel Skelton	627	Maureen Boylan

No.	Name	No.	Name/Organisation
579	Liam Kenny	628	Orla Breen
580	Aidan McGovern	629	Cormac Breen
581	Cliona O'Brien	630	Mary Reid
582	Kuba Szydal	631	H. McAllister
583	Kildare Climate Action Linkage Group	632	Chris Glennan
584	Joseph O'Loughlin	633	Oilfield Solutions LTD.
585	Andrina Faherty	634	Elma Flanagan
586	Rioghnaigh Bracken	635	David and Barbara O'Brien
636	John and Catherine Looby	685	Catherine Corrigan
637	Seamus Aldridge	686	Colivet Family
638	Norah and Liam Kennedy	687	Mary Byrne
639	Ruby Hanley	688	Julie Byrne
640	Pat McCarthy	689	Alan Byrne
641	Barbara Hennessy	690	Ellen Byrne
642	Oliver Hennessy	691	Moya O'Donoghue
643	Aine Hennessy	692	O'Brien Fine Foods
644	Sean O'Keeffe	693	Carmel O'Connor
645	Fiona O'Keeffe	694	Michael & Mary Nolan
646	Springwood Limited	695	Mark & Fiona McCormack
647	C Carroll	696	Anthony, Miriam & Philip Lawlor
648	Mary Gallagher	697	Larry Breen
649	Stephen Concannon	698	Cllr Anne Breen
650	Mary Concannon	699	Ines McCormack
651	Fidelma and Des O'Brien	700	Brian O'Mullaney
652	Gabriel and Ann Horan	701	Cllr Fintan Brett
653	Catherine Murphy T.D	702	Cllr Seamie Moore
654	M and R O'Leary	703	Supervalu Sallins
655	VEI Global	704	Tom O'Donovan
656	Joan Purcell	705	Patricia Gammell
657	Fergus Phelan	706	Kieron Gammell
658	Glengolden Builders Limited	707	Dolores Macken
659	Mae Leonard	708	Martin Waters
660	Mary Doyle	709	Nina Waters
661	Flannan Garry	710	Philip Cawley
662	D McNulty & E Doyle	711	A. Cawley
663	Mary Doyle	712	Margaret Mooney
664	Jim Doyle	713	Kathy Hannon

No.	Name	No.	Name/Organisation
665	Declan McGovern	714	Teresa O'Neill
666	Naas Racecourse PLC	715	Emma Hannon
667	Joe, David and Robert Osborne	716	Justin Garvey
668	Jimmy Kelly	717	Cathal Ruane
669	Geraldine Fox	718	Sinead Ruane
670	Oisin Gill	719	Colm Byrne
671	Mary Gill	720	Isabela Gjoreuolw
672	Martin Gill	721	Dr. Keith Gardiner
673	Moira O'Connell	722	Lisa Gardiner
674	James McNamara	723	Niamh Greaney
675	Springwood Limited	724	Darren Greaney
676	Dorothy Kinirons	725	Nikolai Potapov
677	SL & P O'Brien	726	Anastasiia Nadezhina
678	Graeme and Margaret Beere	727	Niamh Scanlan
679	Clare Cleary and Family	728	David & Daniel Scanlan
680	Edevale Property Limited	729	Blathnaid Harney
681	Conor Prasad	730	Colm Dolan
682	Munoo Prasad	731	Robbie Parsons
683	Ravi Prasad	732	Angela Free
684	Claire Prasad	733	Glen Blom
734	Lindy Blom	782	Matthew McKeon
735	Louise Reynolds	783	Bernadette Devine
736	Mark Dillon	784	Gemma Byrne
737	Ken Allen	785	William Dillane
738	Laura Allen	786	Joan Butler
739	Sinead Shannon	787	Eithne O'Reilly Higgins
740	Ruairi Hasson	788	James Higgins
741	Graham N. Armstrong	789	Ann O'Beirne
742	Taram Davis	790	Eamon O'Brien
743	Sinead Davis	791	Michael McCarthy
744	Sharon Mc Eleney	792	Lorna McCarthy
745	Sean Mc Eleney	793	Paul Drennan
746	Mark Bernard	794	Aine McDermott
747	Gillian Cassidy	795	Jana Drennan
748	Fiona Cashin & David Kiely	796	Grainne MacGlinchey
749	Dr. Gillian Lavelle	797	Etienne Du Plessis
750	Cian Butler	798	Emma McGrane

No.	Name	No.	Name/Organisation
751	Ricardo Paco	799	Paul McGrane
752	Patricia Fernandes	800	Mark Hendrick
753	Ana Carolina Marcelino	801	Aislinn De Debra
754	Arom Rodrigues	802	Michael Quinn
755	Derek Halvey	803	Marie Quinn
756	Emily Spain	804	Shaun Malone
757	Paul Fitzpatrick	805	Francis Farrell
758	Frankie Fitzpatrick	806	Anne Farrell
759	Sheena Breen & Peter Flanagan	807	Teresa Behan
760	Maximiliano De Aluzido Carvalho	808	N/A (duplicate)
761	Cristhiane Oliveria Laima	809	Imelda Behan
762	Caroline & Herbert Croeza	810	Les Harris
763	Seamus Dolan	811	Sean Harris
764	Linda Ryan	812	Rhona Harris
765	Sanjay Murthy	813	Benjamin Harris
766	Neha Redy	814	Bridget Geary
767	Vinicius Peres	815	Antoinette Doorey
768	Thais Almedia	816	L Doorey
769	Nessa Hughes	817	Kate Doorey
770	Pedro Innece	818	Tara Doorey
771	Brendan Thereon	819	Patrick Twomey
772	Fran Thereon	820	Aisling Twomey
773	Chloe Connolly	821	Molly Finnegan
774	Sean Connolly	822	Mark Finnegan
775	Gavin Haberlin	823	Laura Deasy
776	Katrina Haberlin	824	C. Deasy
777	Svetlana Mullaney	825	Aoife Mason
778	Derek Leahy	826	Neill Mason
779	Bernadette Bradley	827	Niall Hynan
780	Kevin Bonner	828	Grace Clancy Hynan
781	Siobhan Hennelly	829	A. Behan
830	J. K. Spring	857	Jane McCoy
831	Marcella Sheehan	858	Elizabeth Whelan
832	Brian Flood	859	Niamh Mahon
833	Bryan Flood	860	Michael Mathimoe
834	Megan Flood	861	Teresa Halloran
835	Joseph Keogh	862	Siobhan & Noel O'Loughlin

No.	Name	No.	Name/Organisation
836	M Mahoney	863	Dan & Olivia Byrne
837	Vincent Walsh	864	Christine Trundle
838	Alasdair Sheridan	865	Danny Trundle
839	Damien Breen	866	Y Trundle
840	Robert Sheridan	867	Ava Trundle
841	Oliver Leavy	868	Debbie Trundle
842	John Reynolds	869	Mark Trundle
843	Jenny Reynolds	870	Daniel Trundle
844	Margaret Reynolds	871	Anthony Leavy
845	Liz Donohue	872	Phil Leary
846	Angela & Padraic Doyle	873	Joan Colfer
847	CA Hanrahan	874	Patricia Goodwin
848	Rita Byrne	875	Rita Garvey
849	L Jones	876	Angela Kavanagh
850	Maureen Daley	877	Paul Kavanagh
851	Sheila & Michael Moore	878	Angela Kelly
852	William Glennon	879	Bryan J May & Adrienne Thomas
853	Breda McElroy	880	Kate Solon
854	Tom Kiernan	881	Patrick Solon
855	Sinead Leahy	882	Margarita Solon
856	Michael Grogan	883	Gertrude Glennon

Table B2: Response to Submissions, as they relate to the SEA

Submission No.	Summary of Submission/Observation	Response	Update of SEA ER required?
1	The Environmental Protection Agency (EPA) outlines a number of items that should be contained in an SEA Environmental Report. A guidance document titled SEA of Local Authority Land Use Plans – EPA Recommendations and Resources was also submitted as part of the submission.	Reviewed and SEA ER cross-checked. No changes needed.	No
116	It does not appear that the SEA has adequately assessed the environmental implications of the proposed new 'P' – Data Centre zoning to the south of the R409, in contrast to the previous industrial zonings, and	Table 8.3 <i>Site Specific Zoning Assessment</i> of the SEA Environmental Report considers the zoning of the data centre lands south of the R409:	No

Submission No.	Summary of Submission/Observation	Response	Update of SEA ER required?
	why the new zoning was considered preferable from an environmental perspective, particularly the impact on residential properties.	Referred to as the following change: <i>“Amend the LAP boundary to include: ‘P: Data Centre Warehouse’ to the east of the LAP.”</i> The assessment found that <i>“Where land which was previously not zoned for development has been zoned under the Naas LAP 2021-2027, an overall negative environmental effect is predicted- particularly where that land-use zoning has the potential to give rise to development. A positive impact is predicted for population and human health with the introduction of further employment opportunities, an increase in educational facilities and further residential areas.”</i>	
138	Not acceptable that SEA information only available when LAP adopted.	The SEA Environmental Report was published and put on public display alongside the Draft Plan.	No
545	Racecourse Gate does not appear in the environmental reports, except at the introduction.	The SEA Environmental Report considers and assesses any Policy/Objectives relating to Racecourse Gate.	No

Appendix C

Proposed Material Alterations to LAP- Responses to Submissions

Table C1: Submissions Received on Material Alterations

Submission	Author
KCC-C37-1	N/A (Test)
KCC-C37-2	Environmental Protection Agency
KCC-C37-3	David Monaghan
KCC-C37-4	Emmet Kelly
KCC-C37-5	Joanne Pender
KCC-C37-6	Department of Environment, Climate and Communications
KCC-C37-7	Meath County Council
KCC-C37-8	Caroline McLoughlin
KCC-C37-9	Transport Infrastructure Ireland
KCC-C37-10	Claudia Stone
KCC-C37-11	Department of Transport
KCC-C37-12	Roisin Stewart
KCC-C37-13	Riognagh Bracken
KCC-C37-14	Riognagh Bracken
KCC-C37-15	Transport Infrastructure Ireland
KCC-C37-16	HSE Environmental Health
KCC-C37-17	Eddie Lenehan
KCC-C37-18	Mountain View Residents' Association
KCC-C37-19	National Transport Authority
KCC-C37-20	Lena Lenehan
KCC-C37-21	Pat Breen
KCC-C37-22	Kathleen Moran
KCC-C37-23	Carole Frost
KCC-C37-24	Kevin Greene
KCC-C37-25	Kevin Greene
KCC-C37-26	Kevin Greene
KCC-C37-27	Mark Noonan
KCC-C37-28	John Kehoe
KCC-C37-29	Cairn PLC
KCC-C37-30	Applegreen Service Areas Ltd
KCC-C37-31	Barry Redmond
KCC-C37-32	C.M. Redmond
KCC-C37-33	Eoghan Redmond
KCC-C37-34	Padraig Redmond
KCC-C37-35	Keith Proctor
KCC-C37-36	Naas Combined Residents Group
KCC-C37-37	Louise Donnelly
KCC-C37-38	Yvonne Codd
KCC-C37-39	Carol Byrne
KCC-C37-40	Janice McGrath
KCC-C37-41	Aidan Doorey
KCC-C37-42	Antoinette Doorey
KCC-C37-43	Dave Caffrey
KCC-C37-44	Cormac Ahern

Submission	Author
KCC-C37-45	Maria Hutchin
KCC-C37-46	Brian McAdam
KCC-C37-47	Kingsfurze Avenue Residents Association
KCC-C37-48	Robert Kennedy
KCC-C37-49	Colm Kenny on behalf of Kildare Green Party Branch
KCC-C37-50	Pat Breen
KCC-C37-51	Kevin Mullaney
KCC-C37-52	R Burke
KCC-C37-53	Fiona & Cathal Carville
KCC-C37-54	Debby Bernadette
KCC-C37-55	Orla Ahern
KCC-C37-56	Fiona Masterson
KCC-C37-57	Gilmar Uyema
KCC-C37-58	Donal Higgins
KCC-C37-59	Donal Higgins
KCC-C37-60	Niall Purcell
KCC-C37-61	Karen English
KCC-C37-62	Sunday's Well Resident's Association
KCC-C37-63	Carmel Geissel
KCC-C37-64	Carmel Geissel
KCC-C37-65	Carmel Geissel
KCC-C37-66	John Lennon
KCC-C37-67	John Lennon
KCC-C37-68	Joy Herron
KCC-C37-69	Miriam Colleran
KCC-C37-70	Brendan Kenny
KCC-C37-71	Conor Prasad
KCC-C37-72	Margharita Solon
KCC-C37-73	Ravi Prasad
KCC-C37-74	Karen McCarthy
KCC-C37-75	Colm Byrne
KCC-C37-76	Zachary McCann
KCC-C37-77	Edmund Murphy
KCC-C37-78	Ian d'Alton
KCC-C37-79	Irish Water
KCC-C37-80	Teresa Behan
KCC-C37-81	An Post
KCC-C37-82	Mary Taaffe
KCC-C37-83	Ricardo Paco
KCC-C37-84	Gerard Byrne
KCC-C37-85	Cormac O'Donovan
KCC-C37-86	Office of Public Works
KCC-C37-87	Gavin McDermott
KCC-C37-88	Gavin McDermott
KCC-C37-89	Aisling Twomey
KCC-C37-90	Ballymore Group

Submission	Author
KCC-C37-91	Aisling McCormack
KCC-C37-92	Stephen O'Brien
KCC-C37-93	Edelvale Property Ltd
KCC-C37-94	Westar Group
KCC-C37-95	Bridget Armstrong
KCC-C37-96	James Lawless TD
KCC-C37-97	Pádraig McEvoy
KCC-C37-98	John Collins
KCC-C37-99	Kings Court Residents' Association
KCC-C37-100	Maureen Boylan
KCC-C37-101	Patrick Solon
KCC-C37-102	Derek Leahy
KCC-C37-103	Abbey Bridge and Canal Residents Group
KCC-C37-104	Les Kelly
KCC-C37-105	Noel Geary
KCC-C37-106	Gail Mooney Collins
KCC-C37-107	Majella O'Keefe
KCC-C37-108	Claire Prasad
KCC-C37-109	Ian Baker
KCC-C37-110	Mark Hendrick
KCC-C37-111	Bob Quinn
KCC-C37-112	Padraig O'Brien
KCC-C37-113	Venturis Investments
KCC-C37-114	Queally Group
KCC-C37-115	Una & Seamus O'Brien
KCC-C37-116	Linda Ryan for Seamus and Linda Dolan
KCC-C37-117	Corcom for Charlton and Leeson Families
KCC-C37-118	Phoebe Dillane
KCC-C37-119	Etienne duPlessis
KCC-C37-120	Audrey Barlow
KCC-C37-121	Ivan Codd
KCC-C37-122	John Walsh
KCC-C37-123	Letitia Foley
KCC-C37-124	Brendan Colivet
KCC-C37-125	Dermot Burke
KCC-C37-126	Christine Murray
KCC-C37-127	Graham Armstrong
KCC-C37-128	Carraig O'scáir Residents Association
KCC-C37-129	Gerard Madden
KCC-C37-130	Pierce Greaney
KCC-C37-131	Christine Murray
KCC-C37-132	Office of the Planning Regulator
KCC-C37-133	Michael O'Brien
KCC-C37-134	Declan McCormack
KCC-C37-135	Munoo Prasad
KCC-C37-136	Department of Education

Submission	Author
KCC-C37-137	Fiona Duigan
KCC-C37-138	Kate O’Riordan
KCC-C37-139	Aonghus Dillane
KCC-C37-140	Adrian Geissel
KCC-C37-141	Adrian Geissel
KCC-C37-142	Diarmuid Parker
KCC-C37-143	Aaron Mac Hale
KCC-C37-144	Aine McDermott
KCC-C37-145	Ciara Breen
KCC-C37-146	Cllr. Anne Breen
KCC-C37-147	Cllr. Seamie Moore
KCC-C37-148	Cormac & Orla Breen
KCC-C37-149	Geological Survey Ireland
KCC-C37-150	Helena Hearne
KCC-C37-151	Hester McAllister
KCC-C37-152	James Dowling
KCC-C37-153	Larry Breen
KCC-C37-154	Mae Leonard
KCC-C37-155	Michaela Piare
KCC-C37-156	Springwood Ltd.
KCC-C37-157	St. Mary's College
KCC-C37-158	The Educena Foundation
KCC-C37-159	Tom McParland
KCC-C37-160	Patricia Gammell
KCC-C37-161	Kieron Gammell
KCC-C37-131	Christine Murray
KCC-C37-132	Office of the Planning Regulator
KCC-C37-133	Michael O'Brien
KCC-C37-134	Declan McCormack
KCC-C37-135	Munoo Prasad
KCC-C37-136	Department of Education
KCC-C37-137	Fiona Duigan
KCC-C37-138	Kate O’Riordan
KCC-C37-139	Aonghus Dillane
KCC-C37-140	Adrian Geissel
KCC-C37-141	Adrian Geissel
KCC-C37-142	Diarmuid Parker
KCC-C37-143	Aaron Mac Hale
KCC-C37-144	Aine McDermott
KCC-C37-145	Ciara Breen
KCC-C37-146	Cllr. Anne Breen
KCC-C37-147	Cllr. Seamie Moore
KCC-C37-148	Cormac & Orla Breen
KCC-C37-149	Geological Survey Ireland
KCC-C37-150	Helena Hearne
KCC-C37-151	Hester McAllister

Submission	Author
KCC-C37-152	James Dowling
KCC-C37-153	Larry Breen
KCC-C37-154	Mae Leonard
KCC-C37-155	Michaela Piare
KCC-C37-156	Springwood Ltd.
KCC-C37-157	St. Mary's College
KCC-C37-158	The Educena Foundation
KCC-C37-159	Tom McParland
KCC-C37-160	Patricia Gammell
KCC-C37-161	Kieron Gammell

Table C1: Proposed Material Alterations- Responses to Submissions

Submission No.	Summary of Submission/Observation	Response
KCC- C37-25	Notes that in the SEA Addendum report (paragraph 23) the Council specifically states that “the proposed material alteration focuses on the investigation for feasibility and does not specify that the development of the road will be completed within the lifetime of the plan.”) The submission states its intention to seek otherwise.	Noted.
OPR	An SEA Non-technical Summary is required to be prepared	An SEA Non-Technical Summary has been prepared and is appended to this SEA Statement as Appendix D
EPA	<p>The submission from the EPA notes the determination regarding the need for Strategic Environmental Assessment (SEA) of the Alterations.</p> <p>The submission also sets out a summary of what should be contained in the contents of a SEA statement once the Plan has been made, a copy of which should be sent to any environmental authority consulted during the process.</p> <p>Environmental Authorities – The submission outlines the bodies that should be consulted under the SEA Regulations.</p>	An assessment of all of the Material Alterations was carried out and detailed in the SEA Addendum which went on public display alongside the proposed Material Alterations.

Appendix D

SEA Non-Technical Summary

Kildare County Council

Naas Local Area Plan 2021-2027

Strategic Environmental Assessment
Non-Technical Summary

Issue | 26 November 2021

This report takes into account the particular instructions and requirements of our client.

It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 278388


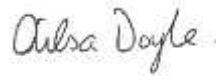

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Document Verification

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Job title		Naas Local Area Plan 2021-2027		Job number	
				278388	
Document title		Strategic Environmental Assessment Non-Technical Summary		File reference	
Document ref					
Revision	Date	Filename	278388_2021_11_17_Naas LAP Non Technical Summary.docx		
Draft 1	4 Nov 2021	Description	First draft		
			Prepared by	Checked by	Approved by
		Name	Almudena Rodero	Ailsa Doyle	Sinead Whyte
		Signature			
Final	10 Nov 2021	Filename	278388_2021_11_17_Naas LAP Non Technical Summary.docx		
		Description	For Issue		
			Prepared by	Checked by	Approved by
		Name	Almudena Rodero	Ailsa Doyle	Sinead Whyte
		Signature			
Issue	15 Nov 2021	Filename	Naas LAP- SEA Non Technical Summary_Issue.docx		
		Description	For Issue		
			Prepared by	Checked by	Approved by
		Name	Almudena Rodero	Ailsa Doyle	Sinead Whyte
		Signature			
		Filename			
		Description			
			Prepared by	Checked by	Approved by
		Name			
		Signature			
Issue Document Verification with Document					
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Content

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Non-Technical Summary	1

Non-Technical Summary

NTS1: Introduction

This is a non-technical summary of the Environmental Report that has been prepared as part of the Strategic Environmental Assessment (SEA) of the Naas Local Area Plan (referred to hereinafter as the ‘Plan’ or the ‘LAP’) for the period 2021-2027. The document has been prepared in accordance with national and EU legislation. It draws attention to the most important issues and provides information on other significant topics.

Any topic which causes concern can be followed in greater detail in the main Environmental Report. The relevant planning legislation comprises the Planning and Development Act 2000, as amended and the Planning and Development Regulations 2001, as amended. Key planning documents reviewed as part of the assessment included:

- Project Ireland 2040: National Planning Framework;
- Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region 2019-2031;
- Kildare County Development Plan 2017-2023 (as varied).

Cognisance was also given to a wide range of legislation, plans and programmes at international, national, regional and local level for relevance to the LAP.

NTS2: Naas Local Area Plan 2021-2027

The Naas LAP provides the main public statement of planning policies and objectives for Naas for the duration of the Plan period (2021-2027) and will replace the existing land-use plan the Naas Town Development Plan 2011-2017.

The policies and objectives are critical in determining the appropriate location and form of different types of development in the study area, as the LAP is the primary statutory land use policy framework against which planning applications are assessed.

The objectives of the LAP will also be used by Kildare County Council (KCC) to guide their activities and to indicate priority areas for action and investment by the Council such as focusing on attracting employment into the district or enhancing the district as a centre for tourism.

The LAP is a key document for setting out a vision for how Naas should develop over the years 2021-2027 and beyond.

NTS3: SEA Methodology

The objective of the SEA 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 ... with a view to promoting sustainable development’* (Article 1 SEA Directive).

It is a systematic, on-going process for evaluating, at the earliest possible stage, the environmental quality and consequences of implementing certain plans and programmes on the environment.

The SEA methodology is based on legislative requirements and Department of Environment, Community and Local Government (DoECLG) / Environmental Protection Agency (EPA) guidance and will ensure compliance with the SEA Directive and associated legislation. The EPA's SEA Pack (Version 21/02/2020) was also used as a source of information during the SEA process.

NTS4: Current State of the Environment

The assessment of the plan with respect to the current Environmental Baseline is the principal task of the SEA process. Consequently, this baseline description must be cognisant of the local level nature of the LAP and the pressures and interrelationships between environmental topics.

The environmental baseline provides an overview of the existing conditions in the LAP area relevant to the plan and covers the following environmental topics:

- Population and Human Health.
- Biodiversity including Flora & Fauna.
- Land and Soils.
- Water Resources.
- Air, Noise and Climate.
- Archaeological, Architectural and Cultural Heritage.
- Landscape and Visual.
- Material Assets.
- Sensitivity Mapping.

The Naas LAP area is located in the eastern part of County Kildare, near its borders with County Wicklow and Dublin.

The plan area is located in the Liffey and Dublin Bay Catchment. The River Liffey rises in the Wicklow Mountains, about 32km southwest of Dublin, and flows in a generally north-westerly direction from its source to the Lackan Reservoir. The river then runs westward in the Kildare lowland and gradually turns north-westward to Newbridge and northeast to Celbridge and Leixlip. It then flows eastward through the city of Dublin, in which it is extensively canalized and bordered with quays. It empties into Dublin Bay, an arm of the Irish Sea, after a course of 80 km.

Over recent decades, Naas has rapidly expanded with the population doubling since the early 1990s, leading to the spread of housing estates across the urban area, particularly to the north-east and south-east of Naas Town Centre. This rapid expansion has increased pressure on the town's amenities, transport infrastructure and parking supply.

According to the EPA's State of the Environment Report, 2020¹, Ireland has not reached targets in a number of environmental directives. This includes not meeting reduction targets set for greenhouse gas emissions. The water quality in our rivers especially has deteriorated over the past four years, and estuaries now have the lowest water quality ranking overall when compared with the targets. Biodiversity is at risk because of habitat loss and damage. Unspoilt areas are being squeezed out, Irelands pristine waters are being lost and the habitats that provide vital spaces for biodiversity are diminishing. Not enough of Irelands seas have been designated as marine protected areas. For climate, nature and water quality, the objective to deliver on people's expectations to live in a healthy and protected environment will not be met in the short or medium term (2030), unless there is an acceleration and full implementation of the measures needed to address these issues. For air and waste, while Ireland is meeting most of its current objectives, it will be challenging to achieve the more stringent measures coming on stream in the future. Radiological risks in Irelands homes and workplaces that are associated with natural geology or our technologies need to be understood and acted upon.

In the EPA's 2020 Vision document it is noted that pressures on the Irish environment increased significantly as a result of a decade of rapid and unprecedented economic growth. Unfortunately, these pressures have accelerated at a rate that far exceeds that observed in other EU countries.

NTS5: Objectives, Targets and Indicators

The SEA is designed to assess the potential environmental impact of the LAP and its associated policies and objectives against the environmental baselines established.

The LAP policies and objectives are assessed against a range of established environmental objectives and targets.

Indicators that are recommended in the SEA are utilised over the lifetime of the LAP to quantify the potential level of impact that the policies and objectives are likely to have on the environment. This enables the measurement of the success of the policies in promoting the sustainable development of the area.

NTS6: Consideration of Alternatives

Alternative development scenarios were considered in the preparation of the Draft LAP. The plan is based on the principles of sustainable development which means that development will be promoted in accordance with the appropriate international, national, regional and county guidelines.

The development of scenarios has been informed by the National Planning Framework and the requirements in regard to compact growth and the requirement for 30% of a town/settlements growth to be located within or contiguous to the existing built-up area.

¹ Note that the Draft LAP and associated SEA superseded the publication of the 2020 State of the Environment Report and thus the 2016 report is referred to in the SEA Documentation.

Four alternative plan scenarios were considered as part of the SEA process:

- Scenario 1: Northwest Quadrant Expansion.
- Scenario 2: Eastern Expansion and Town Centre Consolidation.
- Scenario 3: Southwest Expansion, and
- Scenario 4: Town Centre Regeneration, North West Quadrant Expansion plus the development of extents.

Scenario 1: Northwest Quadrant Expansion

This scenario involves the development of employment and residential land in the Northwest quadrant of the town, and the provision of ancillary services within the quarter to facilitate this development. Development will be concentrated in close proximity to planned strategic infrastructural improvements- particularly the N7/M7 upgrade and Sallins Train Station.

For the purpose of this assessment, it is assumed that this scenario relates to land that is predominantly already zoned for employment and residential development in the Northwest Quadrant and does not generally relate to greenfield development. As such, an overall neutral impact on the environment in general is predicted. A positive impact on population and human health is likely to occur through the provision of a new neighbourhood centre and indeed the fulfilment of new residential and employment opportunities.

The stipulation that the development would occur in close proximity to strategic infrastructural improvements- such as the Sallins Train station or the N7/M7 motorways is however a new consideration. For the purpose of this assessment, it is assumed that this relates to greenfield land. Thus, a negative impact on the environment in general is anticipated.

A positive impact on population and human health and air, noise and climate is predicted here in that development in close proximity to strategic infrastructure would reduce dependence on private transport and long commuting distances.

As part of this development scenario, it is proposed that infrastructural links would be provided back to, and around the town centre, including public transport, pedestrian, and cycle links. Improved links to the railway station are also proposed.

Scenario 2: Eastern Expansion and Town Centre Consolidation

This Scenario involves greenfield development on lands to the east of the town while at the same time seeking to consolidate the town centre by seeking development of vacant or underutilised sites.

Greenfield development has the potential to result in a significant negative impact on the environment, in general, and is not considered a desirable development scenario. It is not possible to classify the predicted impact on population and human health as a result of this development scenario as both a positive and negative impact on the same could be considered. It is likely that a positive impact on population and human health will occur through the provision of residential opportunities, and the consolidation of the urban core.

However, the loss of open space in the LAP area as a result of the proposed greenfield development is also likely to result in a negative impact on the same environmental factors.

This scenario also provides for the zoning of former agricultural lands for new residential development regardless of conformity with planning guidelines, infrastructure capacity or environmental constraints. This has the potential to result in a significant negative impact on the environment and is not considered a desirable development scenario for the LAP.

In addition, this scenario provides for new and upgraded infrastructural links to serve the expanded area. For the purpose of this assessment, it is assumed that this relates to New Roads Objective. Any new roads development has the potential to result in a negative impact on the environment, in general. However, a positive impact on population and human health is envisaged through enhanced transport opportunities.

Scenario 3: Southwest Expansion

This scenario relates to the growth of employment and residential development to the south west of the town, to merge with the Killashee and Jigginstown areas. It focuses on the development of new residential and employment uses in the environs of the town centre, in proximity to the M7 Motorway. For the purposes of this assessment, it is assumed that lands currently greenfield. As such, a negative impact on the environment in general is predicted.

The focus on development of low density residential and employment uses in the environs of the town centre is likely to result in a negative impact the environment, where development takes place away from the town centre.

Scenario 4: Town Centre Regeneration, Northwest Quadrant Expansion plus the development of extants.

This development scenario involves the consolidation of the existing town centre by encouraging the regeneration and appropriate development of vacant and under-utilised sites in the town. Urban regeneration and redevelopment can substantially contribute to the sustainable development of urban areas and are likely to result in an overall positive impact on the environment.

Much of the town centre of Naas is already zoned for development, so by focusing on the re-development and regeneration of these zonings rather than zoning new greenfield land for development on the periphery, additional environmental impacts can be avoided. Similarly, by focusing on the sequential development of already zoned residential and employment lands in the Northwest Quadrant, the Council can seek to meet the demands of the growing population of the LAP area, without having to develop on greenfield lands.

These initiatives will both work towards reducing the onset of urban sprawl in Naas. Urban sprawl and the prevalence of low-density development on the periphery of urban centres work to exacerbate problems of over-consumption of greenfield land, dependence on private transport and long commuting distances.

Thus, consolidation of the town will likely result in a positive impact on air, noise and climate. A positive impact on population and human health is also envisaged, through the provision of residential and commercial opportunities. A high population density in the town centre of Naas could however put a strain on utilities and services, and it should be ensured that there is sufficient water and wastewater capacity to facilitate any residential development.

Conclusion of Alternatives Assessment

The emerging preferred development scenario for the Naas LAP from an environmental perspective is Scenario 4: Town Centre Regeneration, Northwest Quadrant Expansion plus the development of extants.

Each scenario was assessed against the environmental aspects and a preferred scenario from an environmental perspective determined.

NTS7: Assessment of Likely Significant Effects

The environmental impacts of the LAP policies and objectives were assessed with respect to the existing environmental baseline and environmental objectives.

As the policies included in the LAP have been designed to promote sustainability and to protect the environment, the majority of policies are expected to have positive impacts when assessed against the environmental objectives. A matrix was prepared to examine these potential impacts. A summary is provided below of the key environmental effects identified.

Population and Human Health

The potential impacts for Population and Human Health are predominantly positive with regards the provision of residential, economic and sustainable transport opportunities in the LAP area.

It is proposed to consolidate the town centre through the regeneration and redevelopment of vacant and under-utilised sites. This will likely result in a positive impact on population and human health, as it discourages urban sprawl, reduces traffic movements, enhances the public realm and encourages more sustainable transport methods.

Policies and objectives relating to improvements to the public realm and accessibility of the town centre will also positively impact the population of Naas.

It is proposed to provide a new residential development Key Development Area at Devoy Barracks, along with lands zoned for new residential development and the Core Regeneration Area sites in the town centre. This will seek to ensure that the longer-term development of Naas is provided for.

The promotion of enterprise and employment development in the Northwest Quadrant will also result in a positive impact on the population on Naas, through increased job opportunities.

Positive impacts will also occur where new transport infrastructure is provided for, or existing infrastructure is upgraded through the provision of improved access through the LAP area. This is particularly true in considering new sustainable transport infrastructure/opportunities.

Biodiversity

The land use zonings and objectives of the LAP will primarily result in a neutral or positive impact on Biodiversity. Development will be largely consolidated within existing zoned or developed lands, with a large portion of development within the existing urban centre of the LAP area.

Uncertainties exist where the precise nature and extent of development is unknown. This is particularly relevant to the various green infrastructure objectives- where it is difficult to ascertain if the proposals relate to natural features, such as parks and hedgerows, or man-made features, such as cycle paths. Most natural green infrastructure features are likely to result in a positive impact on biodiversity, through species and habitat provision, while often man-made features such as greenways can result in a negative impact on the existing biodiversity through increased human interaction.

There is the potential for negative impacts to occur where greenfield lands have been zoned for development- such as the land at the north-east of the plan area, which has the potential, even with the provision of mitigation, to impact on habitats and species. Similarly, potential negative effects on biodiversity are identified where large-scale infrastructure is proposed such as the Sustainable Travel Bridge over the M7, new road schemes or the expanded DART line and new train station, west of Sallins.

Land and Soils

The majority of potential impacts for Land and Soils are neutral or positive as development will primarily be consolidated within existing zoned or developed lands.

Uncertainties will occur where the precise nature and extent of proposed new development is unknown.

There is the potential for negative impact to occur where greenfield lands have been zoned for development- such as the land at the north-east of the plan area, as well as where new roads are proposed.

Water

The land use zonings and objectives of the LAP will primarily result in a neutral impact on Water as development will largely take place with existing zoned or developed lands.

There is the potential for negative impacts to occur where greenfield lands have been zoned for development- such as the land at the north-east of the plan area.

Similarly, potential negative effects on water are identified where large-scale infrastructure is proposed such as the Sustainable Travel Bridge over the M7, new road schemes or the electrification of the DART line and expanded Park and Ride facility at Sallins railway station².

A Strategic Flood Risk Assessment (SFRA) was carried out in support of the LAP.

The SFRA recommended a number of flood risk management objectives for specific areas, ensuring planning applications, where applicable, will require a FRA of appropriate detail. The level of detail within the FRA will depend on the risks identified and the proposed land use.

Air, Noise and Climate

The potential impacts on Air, Noise and Climate are predominantly positive or neutral as the proposals to consolidate the town centre will likely result in a reduction in traffic movements.

The plan also promotes sustainable travel modes while making provisions for improved pedestrian and cycle routes in, and around the town centre. Such measures will have a positive effect on air, noise and climate.

This Plan comprises a range of climate change adaptation objectives relating to the promotion of renewable energies, sustainable transport, energy reduction etc. These objectives will likely result in a positive impact on air quality and climate change mitigation.

Uncertainties will occur where the precise nature and extent of proposed new development is unknown. There is the potential for negative impacts to occur where new roads objectives are proposed.

Proposed new road schemes are likely to result in a negative air quality, noise and climate impacts due to both the materials used in construction, but also by means of the encouragement of private vehicle use.

Heritage

The land use zonings and objectives of the LAP will primarily result in a positive or neutral impact on Heritage as development will largely take place with existing zoned or developed lands.

Where urban regeneration or redevelopment is proposed in the town centre, it is not possible to fully ascertain if this is likely to result in a negative impact on heritage, as much of the town comprises an ACA. There are certain implications for development within an ACA - protection generally relates to the external appearance of structures and features of the streetscape. Generally, any works that may have a potential impact on the exterior would require planning permission, such as changes to the original roofing material, windows, boundary walls etc.

² Notwithstanding objectives MTO2.5 and MTO2.6 of the Plan, it is noted the rail line and station are located outside of the LAP boundary.

The aim of ACA designation is not to prevent development, rather to guide sensitive, good quality development, which will enhance both the historical character of the area and the amenity of those who enjoy it.

Other uncertainties will occur where the precise nature and extent of proposed new development is unknown and where the discovery of heritage features cannot be ruled out.

The plan does however place a significant emphasis on the retention, protection and enhancement of existing heritage features within the LAP area.

There is the potential for negative impacts to occur where greenfield lands have been zoned for development- such as the land at southwest of the plan area, as this has the potential to impact on archaeology.

Landscape and Visual

The majority of potential impacts for Landscape and Visual are neutral.

A number of positive impacts on the townscape of Naas will likely result from the range of regeneration and urban realm proposals included in the Plan.

Uncertainties exist where the precise nature, extent or scale of proposed development is unknown.

There is the potential for negative impacts to occur where greenfield lands have been zoned for development- such as the land southwest of the plan area, or where new roads objectives are proposed. This is particularly relevant with regards the proposed new road schemes.

Material Assets

In general, the potential impacts on Material Assets are largely considered as positive or neutral. This is because development will occur in a manner that is balanced and self-sustaining occurring in tandem with physical and social infrastructure.

The proposed consolidation of development in the town centre of Naas has however the potential to result in a negative impact on material assets. A high population density could put a strain on material assets, and it should be ensured that there is sufficient water and wastewater capacity to facilitate any residential development. However, the recent upgrade to Osberstown WWTP should accommodate all development proposed under the plan.

NTS8: Mitigation Measures

This Environmental Report has highlighted some potential negative environmental impacts that may arise from the implementation of the LAP in relation to new policies, zonings and land use designations. A number of mitigation measures have been identified to prevent, reduce and as fully as possible offset any potential significant adverse impacts on the environment of implementing the LAP.

It is envisaged that all planning applications for new developments in the LAP area will be environmentally assessed and specific mitigation proposed where appropriate.

NTS9: SEA Monitoring

Article 10 of the SEA Directive requires that monitoring should be carried out in order to identify at an early stage any unforeseen adverse impacts associated with the implementation of the LAP.

A monitoring programme was developed based on the indicators selected to track progress towards achieving strategic environmental objectives and reaching targets, enabling positive and negative impacts on the environment to be measured. As previously described, the environmental indicators have been developed to show changes that would be attributable to implementation of the LAP.

The SEA carried out has ensured that any potential significant environmental impacts have been identified and given due consideration.

KCC, as the planning authority, is responsible for collating existing relevant monitored data, the preparation of preliminary and final monitoring evaluation reports, the publication of these reports and, if necessary, the carrying out of corrective action.