Local Authority Own Housing Development at Station Road, Kildare
Biodiversity Statement

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Ecological Resilience
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Contents

1 Introduction

Kildare County Council (KCC) proposes to develop new housing at An Tríantán, Station Road, Kildare.

This report comprises a biodiversity statement prepared in support of the proposed development. It has been prepared by Namrata Kaile, Ecologist and Environmental Consultant with Brady Shipman Martin. She holds a Bachelor's Degree (BSc) in Life Sciences from University of Delhi and a Master's Degree (MSc) with distinction in Environmental Sciences from Trinity College Dublin. She is a full member of Chartered Institute of Ecology and Environmental Management (MCIEEM) and has been working professionally in the field of environmental consultancy for the last five years. Namrata is experienced in drafting and reviewing EIA Screening Reports, AA Screening Reports as well as in coordination of EIARs.

A technical review of this document has been completed by Senior Ecologist and Associate, Matthew Hague BSc MSc Adv. Dip. Plan. & Env. Law CEnv MCIEEM. Matthew is a highly experienced and qualified ecologist, with a master's degree in Ecosystem Conservation and Landscape Management. He has over 20 years of experience in ecological and environmental consultancy, across a wide range of sectors. Matthew is a Chartered Environmentalist (CEnv) and a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM). Matthew has also completed an Advanced Diploma in Planning and Environmental Law, at King's Inns and is a member of the Irish Environmental Law Association (IELA).

A bat survey report has also been prepared in support of the proposed development, by Wildlife Surveys Ireland. This Biodiversity Statement refers, where appropriate, to the bat survey report.

1.1 Site Location

The subject site of approximately 0.495ha is located at Station Road (R415), in Kildare town, Co. Kildare. It is located between Melitta Road (R413) to the north, Station Road (R415) to the west, Campion Crescent to the east and Dara Park Road to the south. Existing residential development adjoins almost all sides of the proposed development. Refer to **Figure 1.1.**

At present the subject site is characterised as a vacant, unmanaged site, with an existing terrace of unoccupied single-storey cottages and associated outbuildings which front Station Road. A telecoms mast and associated shed area are also located within the site boundary. Boundary conditions vary across the site, comprising stone walls, blockwork walls, embankments, wire mesh fencing, timber fencing, planted boundaries and metal fencing.

Under the Kildare Town Local Area Plan 2023-2029, the site is zoned as '*Existing Residential/ Infill'- To protect and enhance the amenity of established residential communities and promote sustainable intensification.* The surrounding area is also largely zoned as residential with pockets of open space & amenity.

Figure 1.1 The location of the proposed development site at Station Road, Kildare Town, Co.Kildare

1.2 Development Description

The proposed development (see **Figure 1.2**) will comprise the following:

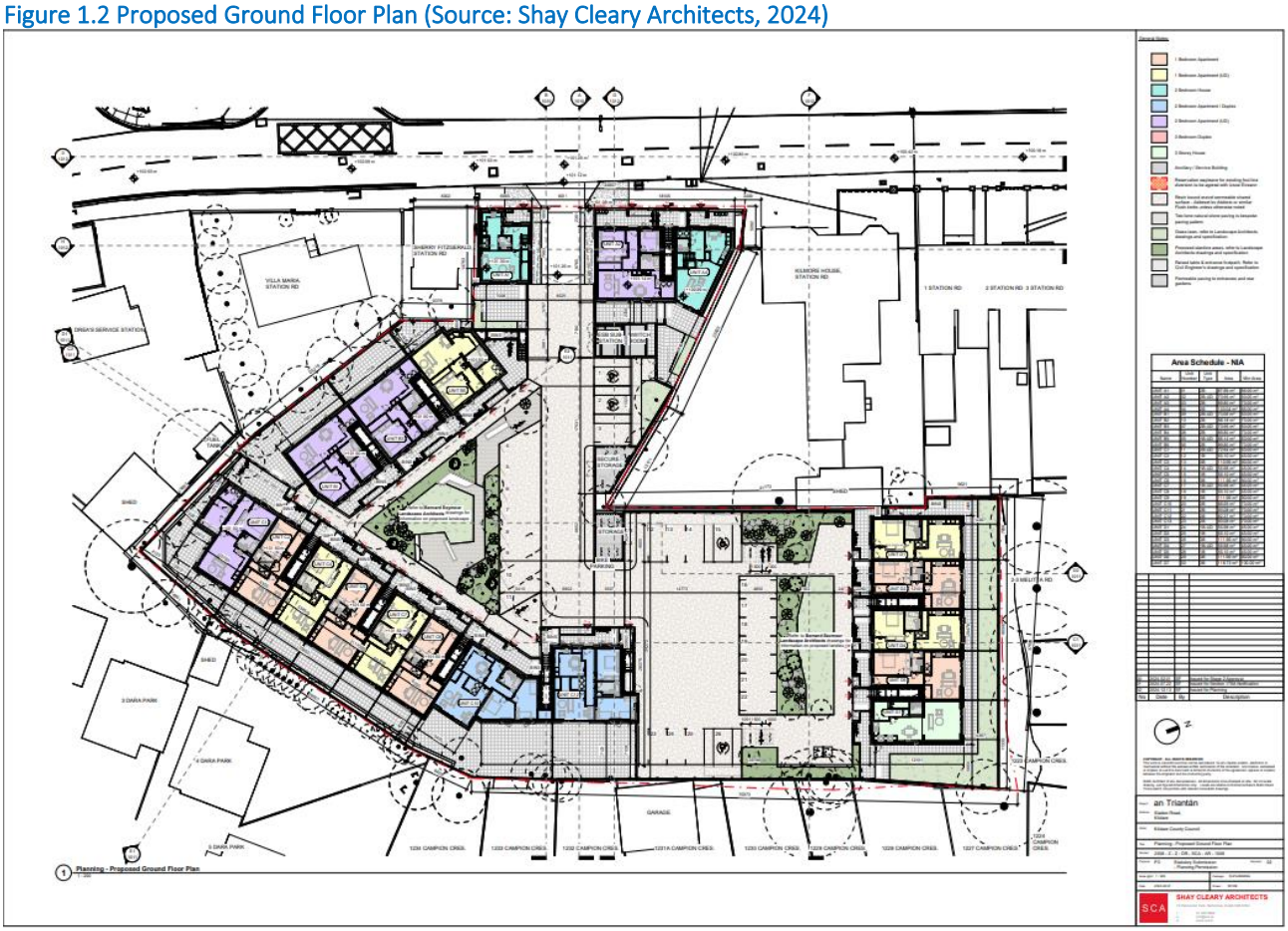
The proposed development consists of:

- The construction of 30 social housing units to include:
  - 5no. 3 bedroom two storey duplex apartments;
  - 1no. 3 bedroom three storey house;
  - 2no. 2 bedroom two storey houses;
  - 2no. 2 bedroom single storey apartments;
  - 4no. 2 bedroom 3 person single storey apartments;
  - 6no. 2 bedroom two storey duplex apartments;
  - 10no. 1 bedroom single storey apartments;
- The construction of ancillary structures to include:
  - ESB substation;
  - Switchroom;
  - Secure cycle storage rooms;
- Associated site works to include:
  - Demolition of 2no. existing cottages and associated ancillary structures on Station Road;
  - Erection of new boundary treatment to south, east and north boundaries;
  - New vehicular and pedestrian entrance from Station Road;
- Provision of:

- 26no. vehicle parking spaces, of which 6no. provided with EV charging points
- 54 no. residents bicycle parking spaces of which 4no. suitable for adapted cycles / cargo bikes
- 16no. visitor bicycle parking spaces of which 4no. suitable for adapted cycles / cargo bikes

New landscaping, internal vehicular and pedestrian shared surface route, public lighting, site drainage works, ancillary site services and development works above and below ground.

Figure 1.2 Proposed Ground Floor Plan (Source: Shay Cleary Architects, 2024)



2 Biodiversity appraisal of the site

2.1 Baseline Data Collection and Field Visits

A desk-based assessment was undertaken in June and July 2024, updated in December 2024 of the site at Station Road and in the wider area. The appraisal focused on habitats and species that are listed as Qualifying Interests (QI) (in the case of SACs) and Special Conservation Interests (SCI) (in the case of SPAs) in the designations for European sites.

In order to provide comprehensive baseline information on the local ecological environment, biodiversity surveys were undertaken at the proposed development site by Brady Shipman Martin on 15 November 2023. The surveys undertaken comprised habitat, invasive species, rare and/or protected species, mammals, birds and day-time bat survey.

An assessment of habitat suitability for species with links to European sites was also undertaken, in order to appraise the potential for *ex-situ* effects on European sites (also refer to the accompanying AA Screening Report, prepared by Brady Shipman Martin, 2024).

Dedicated bat surveys were carried out by Wildlife Surveys Ireland in August and September 2024. The bat survey report is submitted separately as part of the overall application. In addition to the bat surveys undertaken, an examination of available information from Bat Conservation Ireland (BCI), previous data from neighbouring sites was also undertaken to compile a list of most likely species in the overall area in addition to the evaluation of the habitat for bats. There are no bat species listed as Qualifying Interests in any European sites within the Zone of Influence. However, Article 12 of the Habitats Directive requires Member States to take requisite measures to establish a system of strict protection of animal species listed in Annex IV(a) in their natural range.

In addition to the ecological surveys undertaken by the authors and other specialist ecologists, specialist tree survey has been carried out, by arborists Arbor Care Ltd. The Arboriculture Report is presented separately.

2.2 Biodiversity Baseline

The proposed development site is not under any wildlife or conservation designation. The NPWS and NBDC databases were consulted with regard to rare species (Curtis & McGough, 1988) and species protected under the *Flora Protection Order* (2022). There are no records of any protected species protected under the *Flora Protection Order* (2022) within the 2km grid square (N71G) that covers the site, and no protected or rare plants were recorded during the surveys undertaken at the site. The 2 km grid square takes in a significantly wider area than the subject site, and the presence of a species in the grid square is not necessarily indicative of its presence on the subject site.

According to the NBDC database there is record of Japanese knotweed (*Reynoutria japonica*) and fringed water-lily (*Nymphoides peltata*) which are invasive alien plant species listed on the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended), within the 2km grid square (N71G) that covers the site.

Fringed water-lily is not present on or near the site (and the site is not suitable for the species, however a stand (c.700 m^2) of Japanese knotweed was recorded on the western side of the site. This has been subject to a formal treatment regime since the autumn of 2022. The treatment will continue until it is certain that the plant has been entirely eradicated from the site, refer to **Figure 2.1** below.

Figure 2.1 Location of Japanese knotweed within the site area, which is being treated (Source: Invasive Plant Company, February 2024)

The site is dominated by scrub and unmanaged grassland with some trees present along the perimeter including a short row of Leyland cypress (*Cupressus x leylandii*) along the northern boundary, and sycamore (*Acer pseudoplatanus*) along the eastern boundary, in notably poor condition. There is also a short line of sycamore and hawthorn (*Crataegus monogyna*) in the centre of the site.

No rare habitats or habitats of any ecological value (i.e. International, National or County Importance, or Local Importance) are present.

The bat surveys undertaken in 2024 concluded that *the site is of importance to bat feeding, However, bats are not using the site for roosting despite the moderate to high bat roost potential of some of the trees onsite.*

Limited evidence of foxes was noted and no evidence of any protected species such as badger, otter (like bats, otters are protected under Article 12 of the Habitats Directive), amphibians or reptiles, or rare or protected plants was recorded during the survey carried out, and the habitats present are entirely unsuitable for such species. The site, in its current state, is of some local value for nesting birds.

There is no habitat on the site suitable for use, even on a very occasional basis, by any overwintering birds, such as pale-bellied Brent goose, or any other protected bird species listed as a Special Conservation Interest (SCI) in any European site within the Zone of Influence.

None of the habitats or features present on the site are Qualifying Interests/Special Conservation Interests in any European site within the Zone of Influence and none of these Qualifying Interests/Special Conservation Interests present on the site. No evidence of any habitats or species with links to European sites was recorded during either the field surveys or desk study undertaken and no 'reservoir' type habitats (habitats which have the potential to support Qualifying Interest/Special Conservation Interest species in any European site) are present.

A review of the Environmental Protection Agency (EPA) web-tool (confirmed during the site visit) indicates that there are no surface water features present on the site or in the immediate vicinity. The nearest mapped

watercourse is the Tully stream c. 1.5km (linear distance) to the south on the other side of the M7 motorway. There is no surface water pathway to the Tully stream from the subject site. The Cloncumber stream flows c. 4.4km to the north-east and the Grand Canal Miltown Feeder is c. 5.2km to the north-east. There is no pathway to either of these water features from the subject site.

The proposed development site is located within the Barrow catchment (14), Barrow_SC_060 (14_18) subcatchments and Tully Stream_010 river sub-basins. As per the WFD 2016-2021 status, the Tully Stream (IE_EA_14T020200) is of 'Poor' status and are 'At risk' for river waterbodies risk. As per the WFD 2016-2021 status, the Cloncumber stream (IE_SE_14C170200) is 'moderate' and the risk status is 'At risk'.

There are no Key Ecological Receptors at the proposed development site and overall the site of the proposed development is of no more than **Local (lower Value) importance**, as defined by the ecological resource valuations presented in the National Roads Authority/Transport Infrastructure Ireland *Guidelines for Assessment of Ecological Impacts of National Road Schemes* (NRA/TII, 2009 (Rev. 2)).

2.3 European Sites and Appropriate Assessment Screening

As set out in detail in the accompanying AA Screening report, prepared by Brady Shipman Martin, no sites designated for nature conservation under the EU Habitats Directive are present on the site. No significant effects on European sites will arise as a result of the development, and it will not be necessary to undertake Appropriate Assessment, which would require the preparation of a Natura Impact Statement (NIS). The AA Screening Report conclusions are as follows:

> *In view of best scientific knowledge this report concludes that the proposed residential development at Station Road, Kildare town, Co. Kildare (An Triantán) individually or in combination with another plan or project, will not have a significant effect on any European sites. This conclusion was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.*
>
> *It is considered that this report provides sufficient relevant information to allow the Competent Authority (Kildare County Council) to carry out an AA Screening under Section 177U of the Planning Acts, and reach a determination that the proposed development will not have any likely significant effects on European sites under in light of their conservation objectives.*

2.4 Habitat loss and disturbance within the site

The development will require site clearance and the replacement of the existing features with new buildings, hard standing and associated landscaping. The existing habitats are of no significant ecological value and their replacement with new development including landscaping and green roofs is not considered a significant ecological impact.

The landscape design, which will incorporate the recommendations of the All-Ireland Pollinator Plan 2021 – 2025, will include a significant amount of new planting, which has been designed with a view to maximising the new biodiversity resource at the proposed development site. The planting proposed for the development will, wherever possible, comprise an appropriate mixture of native trees and shrubs, preferably of local provenance

These measures will ensure that there will be no residual impact from the loss of habitat on the site – in fact overall biodiversity on the site is expected to improve.

As noted in the Bat Survey Report (Wildlife Surveys Ireland) the bat surveys indicate that the site is of local importance for bat feeding, However, bats are not using the site for roosting despite the moderate to high bat roost potential of some of the trees onsite. According to the report, in the absence of listed mitigation measures there is the potential for loss of feeding and commuting habitat for bats on the site, loss of roosting habitat and light pollution, as a result of the proposed development,

No significant impacts are expected on nesting birds, given the limited ecological value of the site. There will be no impacts on otters, badgers or other large mammals, amphibians, reptiles, lepidoptera or any other species groups as a result of the proposed development.

A strand of Japanese knotweed was recorded on the western side of the site. This has been subject to a formal treatment regime since the autumn of 2022. The treatment will continue until it is certain that the plant has been entirely eradicated from the site. The invasive species management plan prepared by LK Group (2024) recommends undertaking a controlled excavation of the material within the development area and exporting the soils to a suitable landfill prior to the redevelopment of the site into residential dwellings. Excavation will take place to remove all evidence of Japanese Knotweed and its Rhizomes up to the boundary wall. Further a C3 Dendro Scott root barrier will be placed on the dig area and extend just beyond the dig areas. The membrane will be lapped with a minimum of 1,000mm overlap on each joint and finished 100mm above proposed finished ground level.

There will be no transfer of invasive plant material during the construction phase that could potentially lead to species such as giant hogweed becoming established in the area. No invasive species will be introduced, either deliberately or inadvertently, to the site. The implementation of biosecurity measures will ensure that no transfer of invasive plant material takes place during the construction phase.

There will, similarly, be no impacts on watercourses or the water environment as a result of the proposed development, either during construction or operation. The drainage design for the proposed development will be in full compliance with the requirements of Kildare Couty Council and the Greater Dublin Strategic Drainage Study (GDSDS).

3 Mitigation measures

3.1 Designated conservation areas

No designated conservation areas will be impacted in any way by the proposed development and no specific mitigation measures are required for the protection of such sites, including European sites. Full details in relation to European sites are provided in a separate Appropriate Assessment Screening Report that is submitted with the planning application.

3.2 Fauna and Habitats

All site clearance and landscaping works will comply with current legislative requirements and best practice.

Where feasible and practicable, and should it be necessary, the removal of vegetation suitable for use by nesting birds will be undertaken outside the bird nesting season (avoiding the period 1 March to 31 August, unless otherwise agreed with the planning authority). Should the construction programme require vegetation clearance between March and August bird nesting surveys will be undertaken by suitably experienced ecologists. If no active nests are recorded, vegetation clearance will take place within 24 hours. In the event that active nests are observed, an appropriately sized buffer zone will be maintained around the nest until such time as all the eggs have hatched and the birds have fledged – a period that may be three weeks from the date of the survey. Once it is confirmed that the birds have fledged and no further nests have been built or occupied, vegetation clearance may take place immediately.

The planting proposed will incorporate a range of species that will attract feeding invertebrates, including moths, butterflies and bees. As noted in Section 2.4, the landscape design will take account of and implement the relevant objectives of the All-Ireland Pollinator Plan 2021 – 2025. Green roofs will also be provided as part of the development.

All planting plans and landscaping proposals will further ensure that no new invasive species are introduced, either deliberately or inadvertently, to the site.

It is recommended that swift boxes be included in the development, the location and number of such features will be confirmed by agreement between the design team and ecologist at the detailed design stage. Swift boxes are not required for ecological mitigation, but will enhance the overall biodiversity value of the completed development.

Mitigation measures for bats (refer to the accompanying report) include a requirement that buildings are to be checked by a bat specialist for the presence of bats prior to major repair or demolition. Mature and/or ivy-covered trees must similarly be checked prior to felling, and a total of six bat boxes (Schwegler 2F, or 2R or similar) must be installed on site.

3.3 Lighting

Lighting can affect different species to varying degrees and within species there is also a range of responses to introduced light ranging from minimal effects to complete avoidance.

The proposed lighting for the proposed development shall be designed in accordance with the following guidelines:

- Bats and Lighting – Guidance Notes for Planners, Engineers, Architects and Developers (Bat Conservation Ireland, 2010)[1];
- Bats and Artificial Lighting at Night, Institute of Lighting Professionals, 2023[2];
- Guidance Notes for the Reduction of Obtrusive Light GN01-21 (Institute of Lighting Professionals, 2021)[3];
- Dark Sky Ireland's Environmentally Friendly Lighting Guide[4].

The proposed lighting will have the following characteristics:

- The minimum level of lighting will be provided within the developed areas, within the lux level criteria required by Kildare County Council (KCC).
- The light temperature of all fittings will comply with the specifications required by KCC.
- No flood lighting will be provided within the proposed development and all light fittings will be LED and are designed to shine downwards and will avoid sky glow and light spill.
- A warm white spectrum shall be adopted to reduce blue light component.
- Luminaires shall feature peak wavelengths higher than 550 nm.
- Lighting will be directed onto the roadways and paths – and away from the open space network.

4 Conclusion

The proposed development will result in the removal of habitats of limited ecological value. A new residential development and associated high-quality landscaping and green roofs will be provided. There will be no long-term residual impact on any ecological receptors, either within or in the vicinity of the site, or associated with any site designated for nature conservation as a result of the proposed development.

It is a predicted impact that there will be a slight negative impact on bat activity due to the loss of tree cover and feeding spaces coupled with the increased lighting required for housing. Although none of the trees were seen to be used as roosts during either night of bat survey, the potential for bat roosting meant they could potentially be used by roosting bats in the future. The inclusion of bat boxes will therefore provide continued opportunities for bat roosting at the site.

Finally planting will aim to compensate for some of the lost vegetation from development, however this will take a number of years for trees and shrubs to reach maturity, meaning in the interim there will be a slight negative impact on bat life.

[1] https://www.batconservationireland.org/wp-content/uploads/2013/09/BCIrelandGuidelines_Lighting.pdf
[2] https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/
[3] https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/
[4] https://www.darksky.ie/lighting-documents/#guidelines

Plates

Plate 1 – View of existing habitats on the site (open area)

Plate 2 – Area of treated Japanese knotweed on the western portion of the site

Plate 3 – Internal view of the derelict cottage (exposed to the elements)

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