



# Appropriate Assessment

## Conclusion Statement

# KILTIERNAN-GLENAMUCK LOCAL AREA PLAN 2025

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## Appropriate Assessment Conclusion Statement

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**Prepared for:**

Dún Laoghaire-Rathdown County Council



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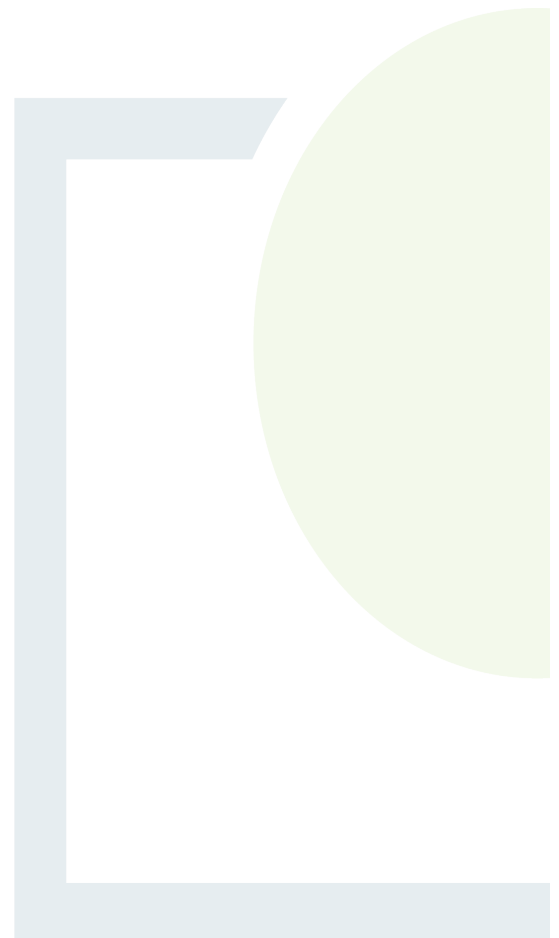
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## Appropriate Assessment Conclusion Statement for the Kiltiernan-Glenamuck Local Area Plan 2025

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

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**Abstract:** Fehily Timoney and Company is pleased to submit this Appropriate Assessment Conclusion Statement to Dún Laoghaire-Rathdown County Council for the Kiltiernan-Glenamuck Local Area Plan 2025.

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## 1. INTRODUCTION

### 1.1 Background

This is the Appropriate Assessment (AA) Conclusion Statement for the Kiltiernan-Glenamuck Local Area Plan 2025 (herein referred to as the 'Plan' or the 'LAP'). AA is required by the Habitats Directive, as transposed into Irish legislation by the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and the Planning and Development Act (as amended). Section 177V of the Planning and Development Act (as amended) requires that a statement is produced which summarises, inter alia, how environmental considerations have been integrated into the plan or programme subject to AA in order to avoid and prevent adverse effects on the integrity of European sites.

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

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

### 1.2 Requirements in relation to AA Conclusion Statements

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

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



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

### 2.1 Integrated Biodiversity Assessment Approach

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

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

### 2.2 Mitigation through Integration of Environmental Considerations into the Plan

The Plan development process was carried out in parallel with the SEA and AA processes. Regular communication and interaction took place between the environmental assessment team and the Plan development team. Environmental considerations that came to light during the SEA and AA processes, including consultation processes, were regularly communicated to the Plan-making team.

A strong level of embedded environmental mitigation was present in early drafts of the Plan to mitigate potential adverse effects on European sites. Environmental mitigation measures applicable to the area of Kiltiernan-Glenamuck were also already defined in the higher-order CDP. The 'embedded' mitigation in the Plan, and the relevant mitigatory policy/objectives defined in the CDP serve to prevent and minimize potential adverse effects to European sites that may occur during Plan implementation. These measures also have the potential also maximise potential environmental benefits and co-benefits associated with the Plan.

Where necessary, additional environmental mitigation, in the form of policy/text additions, were integrated into the Plan to further mitigate the potential adverse effects. This process was carried out in an iterative manner to ensure optimal Plan-making and environmental outcomes. Environmental considerations were also integrated into the Plan so as to facilitate maximising identified positive environmental effects of the Plan.

Environmental mitigation measures embedded in early iterations the LAP to mitigate adverse effects on European sites are presented in Table 2-1.

Environmental mitigation measures defined in the DLR CDP that will serve to mitigate adverse effects on European sites due to implementation of the Plan are presented in Table 2-2.

Additional text clarifying environmental protection related obligations and environmental enhancement opportunities has been attached to various previously defined policies/objectives in the Plan. These text additions are itemised and presented in Table 2-3. This text has been shaped to ensure that environmental considerations are appropriately taken into account during Plan implementation and will also serve to prevent adverse effects on European sites.

All recommendations have been fully integrated into the Plan, as necessary.



Due to the inter-relationship between various environmental components, environmental mitigation measures defined for one component can also serve to benefit other environmental components.

**Table 2-1: Embedded Environmental Mitigation**

Policy / Objective References	Policy/Objective
KGLAP6	It is Policy to facilitate Uisce Éireann in ensuring that all wastewater generated is collected, treated and discharged after treatment in a safe and sustainable manner, having regard to the standards and requirements set out in EU and national legislation and guidance.
KGLAP7	It is Policy to facilitate compliance with the requirements of the EU Water Framework Directive and any relevant legislation. In this regard, the Council will facilitate compliance with the relevant objectives and measures set out in the ongoing 'River Basin Management Plan' (2022- 2028) and associated Programme of Measures, where relevant. Applications for development under the Plan must demonstrate that the proposal for development would not adversely affect a water body's ability to meet its objectives under the Water Framework Directive, individually as a result of the proposed development or cumulatively, in combination with other developments.
KGLAP8	It is Policy to ensure the protection of groundwater resources within the KGLAP area and associated habitats and species in accordance with the EU Groundwater Directive. All new planning applications within the LAP boundary shall have regard to the likely impacts the proposed development may have on groundwater resources.
KGLAP9	It is Policy to implement the main elements of the DLR GI strategy in relation to water management including: <ul style="list-style-type: none"> <li>•Reducing the rate, volume, and improve the quality of surface water runoff.</li> <li>•Managing runoff at source through the use of infiltration systems.</li> <li>• Promoting local sustainable urban drainage systems (SuDS), 'Green Streets' and green roofs.</li> <li>• Enabling SuDS to be located in the public realm.</li> </ul>
KGLAP10	It is Policy to ensure that Sustainable Drainage Systems (SuDS) is applied to any development in the KGLAP area and that site specific solutions to surface water drainage systems are developed which meet the requirements of the Water Framework Directive and associated River Basin Management Plan. SuDS measures may include green roofs, permeable paving, detention basins, infiltration systems etc.
KGLAP11	It is Policy to ensure the implementation of the surface water legislation 'Environmental Objectives (Surface Waters) Regulations 2009' to ensure that development permitted would not have an unacceptable impact on water quality including surface waters, ground water, river corridors, estuarine waters, bathing waters, coastal and transitional waters. Development within the LAP area shall comply with the Policies and Objectives of the County Development Plan relating to protection of existing water and drainage infrastructure.
KGLAP12	It is policy to ensure that planning applications take into account any existing groundwater protection schemes and groundwater source protection zones and/or the likely impacts that the development may have on groundwater.
KGLAP13	It is policy to ensure the implementation of the EU Water Framework Directive and the EU Groundwater Directive to encourage protection of the groundwater resources and associated habitats and species in and around the LAP.
KGLAP14	It is Policy to manage flood risk in the KGLAP area in accordance with the requirements of The Planning System and Flood Risk Management Guidelines for Planning Authorities, DECLG and





Policy / Objective References	Policy/Objective
	<p>OPW (2009) and Circular PL02/2014 (August 2014), and to require all proposed developments to carry out a Site-Specific Flood Risk Assessment that shall demonstrate compliance with:</p> <ul style="list-style-type: none"> <li>• The Planning System and Flood Risk Management, Guidelines for Planning Authorities (DEHLG/OPW, 2009), as may be revised and/or updated.</li> <li>• The prevailing Dún Laoghaire-Rathdown County Development Plan.</li> <li>• The SSFRA which shall pay particular emphasis to site specific mitigation measures and any necessary management measures per Appendix B4 of the above-mentioned 2009 National Guidelines.</li> </ul>
KGLAP42	It is a policy that all multi-unit residential schemes and commercial developments demonstrate at pre planning and application stage how biodiversity has informed the layout and overall site framework for development.
KGLAP43	It is policy that at pre planning stage applicant are encouraged, where appropriate, to pilot the Biodiversity Net Gain Approach (BNG) for development.
KGLAP44	It is policy to acknowledge and respect areas of ecological importance, local topography, watercourses, hedgerows, woodlands, mature trees and views when providing open space and to ensure the protection of ecological linkages when providing open space within the Plan area.
KGLAP45	<p>It is Policy to:</p> <ul style="list-style-type: none"> <li>• Conserve Protected Areas and other high-quality habitats and species thereby ensuring a rich and diverse environment within the Plan area.</li> <li>• Ensure biodiversity is factored into nature-based solutions when developing proposals within the KGLAP area.</li> <li>• Conserve and restore biodiversity in line with the key theme of the dlr County Biodiversity Action Plan 2021 – 2025.</li> </ul>
KGLAP47	It is policy to acknowledge the important protection role played by agricultural and high amenity lands both within and adjoining the plan lands. The agricultural and high amenity land use zoning objective provide for a transition area between the built-up area of Kiltiernan-Glenamuck and the more sensitive rural upland areas.
GI1	It is an Objective to protect and maintain important hedgerows/tree lines, where appropriate, within the LAP lands (including those identified in the 'DLR Biodiversity Action Plan, 2021-2025' and the dlr Hedgerow review and evaluation (2021) and any hedgerows which form part of townland boundaries) and promote native hedgerow enhancement and planting.
GI6	It is an objective that the design of lighting within the LAP area should seek to minimise light pollution and adverse effects on bat species.
GI7	It is an objective that where development sites adjoin an ecologically sensitive area adequate buffer areas shall be provided. In accordance with the County Development Plan ecological and hedgerow assessment shall be carried out for such developments.



**Table 2-2: Environmental Mitigation defined in the CDP**

Policy / Objective Reference	Policy / Objective
CS10	It is a Policy Objective to implement a programme for the preparation of Local Area Plans and to prioritise areas in accordance with the overarching strategic objectives of the Core Strategy including those areas which are experiencing and/or likely to experience large scale development or regeneration.
PHP24	It is a Policy Objective to protect the green belt areas and restrict residential development.
T23	It is a Policy Objective, in conjunction and co-operation with other transport bodies and authorities such as the TII and the NTA, to secure improvements to the County road network – including improved pedestrian and cycle facilities, subject to the outcome of environmental assessment (SEA, EIA and AA), flood risk assessment and the planning process (RPO 8.10, RPO 8.16)
T25	It is a Policy Objective that where projects for new roads, identified under Section 5.8, are not already provided for by existing plans/ programme or are not already permitted, that the feasibility of progressing these projects shall be examined, taking into account environmental sensitivities as identified in the SEA Environmental Report (including greenhouse gas emissions and other emissions to air) and the objectives of the Plan relating to sustainable mobility. A Corridor and Route Selection Process will be undertaken where appropriate, for relevant new road infrastructure in two stages: Stage 1 – Route Corridor Identification, Evaluation and Selection and Stage 2 – Route Identification, Evaluation and Selection. In implementing this Objective, the Council will comply with any national policy or guidelines issued relating to the assessment of greenhouse gas emissions and other emissions to air for new transport projects.
T27	It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines.
E20	It is a Policy Objective to support the transition to a low carbon economy.
GIB4	It is Policy Objective to conserve and enhance existing High Amenity Zones and to seek to manage these and other areas to absorb further recreational uses and activity without damaging their unique character
GIB12	It is a Policy Objective to promote, protect and enhance sustainable and appropriate access to the natural heritage of the County, where practicable, in a balanced way while protecting the natural heritage of the County.
GIB18	It is a Policy Objective to protect and conserve the environment including, in particular, the natural heritage of the County and to conserve and manage Nationally and Internationally important and EU designated sites - such as Special Protection Areas (SPAs), Special Areas of Conservations (SACs), proposed Natural Heritage Areas (pNHAs) and Ramsar sites (wetlands) - as well as non-designated areas of high nature conservation value known as locally important areas which also serve as 'Stepping Stones' for the purposes of Article 10 of the Habitats Directive.
GIB19	It is a Policy Objective to ensure the protection of natural heritage and biodiversity, including European Sites that form part of the Natura 2000 network, in accordance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines.
GIB21	It is a Policy Objective to protect and preserve areas designated as proposed Natural Heritage Areas, Special Areas of Conservation, and Special Protection Areas. It is Council policy to promote the maintenance and as appropriate, delivery of 'favourable' conservation status of habitats and species within these areas.



Policy / Objective Reference	Policy / Objective
GIB22	It is a Policy Objective to protect and promote the conservation of biodiversity in areas of natural heritage importance outside Designated Areas and to ensure that notable sites, habitats and features of biodiversity importance - including species protected under the Wildlife Acts 1976 and 2000, the Birds Directive 1979, the Habitats Directive 1992, Birds and Habitats Regulations 2011, Flora (Protection) Order, 2015, Annex I habitats, local important areas, wildlife corridors and rare species - are adequately protected. Ecological assessments will be carried out for all developments in areas that support, or have potential to support, features of biodiversity importance or rare and protected species and appropriate mitigation/avoidance measures will be implemented. In implementing this policy, regard shall be had to the Ecological Network, including the forthcoming DLR Wildlife Corridor Plan, and the recommendations and objectives of the Green City Guidelines (2008) and 'Ecological Guidance Notes for Local Authorities and Developers' (Dún Laoghaire-Rathdown Version 2014).
GIB23	It is a Policy Objective to protect the Ecological Network which will be integrated into the updated Green Infrastructure Strategy and will align with the DLR County Biodiversity Action Plan. Creating this network throughout the County will also improve the ecological coherence of the Natura 2000 network in accordance with Article 10 of the Habitats Directive. The network will also include non-designated sites.
GIB24	It is a Policy Objective to maintain and protect the natural character and ecological value of the river and stream corridors in the County and where possible to enhance existing channels and to encourage diversity of habitat and nature-based solutions that incorporate biodiversity features. It is also policy (subject to the sensitivity of the riverside habitat), to provide public access to riparian corridors, to promote improved passive recreational activities.
GIB25	It is a Policy Objective to retain and protect hedgerows in the County from development, which would impact adversely upon them. In addition, the Council will promote the protection of existing site boundary hedgerows and where feasible require the retention of these when considering a grant of planning permission for all developments. The Council will promote the County's hedgerows by increasing coverage, where possible, using locally native species and to develop an appropriate code of practice for road hedgerow maintenance. The Council will promote the protection of existing hedgerows when considering a grant of planning permission for all developments.
GIB28	It is a Policy Objective to prepare an 'Invasive Alien Species Action Plan' for the County which will include actions in relation to Invasive Alien Species (IAS) surveys, management and treatment and to also ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applicants will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011 (S.I. 477/2011).
EI3	It is a Policy Objective that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, either directly or indirectly. It is a Policy Objective to promote the changeover from septic tanks to collection networks where this is feasible and to strongly discourage the provision of individual septic tanks and domestic wastewater treatment systems in order to minimise the risk of groundwater and surface water pollution. It is a Policy Objective to prohibit multiple dwelling units discharging to communal wastewater treatment systems.



Policy / Objective Reference	Policy / Objective
EI4	It is a Policy Objective to require all development proposals to provide a separate foul and surface water drainage system – where practicable. (Consistent with RPO 10.12)
EI5	It is a Policy Objective: To ensure the delivery of the relevant policies and objectives of the River Basin Management Plan for Ireland 2018 – 2021 and any subsequent plan, including those relating to protection of water status, improvement of water status, prevention of deterioration and meeting objectives for designated protected sites. To support Irish Water in its implementation of Water Quality Management Plans for ground, surface, coastal and estuarine waters as part of the implementation of the EU Water Framework Directive. To support Irish Water in the development of Drinking Water Protection Plans.
EI7	It is a Policy Objective to require that all developments relating to water supply and wastewater treatment are subject to screening for Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any European sites and that the requirements of Article 6 of the EU Habitats Directive are met. (Consistent with RPO 10.7 of the RSES).
EI8	It is a Policy Objective to ensure the protection of the groundwater resources in and around the County and associated habitats and species in accordance with the Groundwater Directive 2006/118/EC and the European Communities Environmental Objectives (Groundwater) Regulations, 2010. In this regard, the Council will support the implementation of Irish Water's Water Safety Plans to protect sources of public water supply and their contributing catchment.
EI10	It is a Policy Objective to work alongside Irish Water to minimise the number and frequency of storm overflows of sewage to watercourses and to establish, in co-operation with the adjoining Local Authorities and Irish Water, a consistent approach to the design, improvement and management of these intermittent discharges to ensure that the needs of the Region's receiving waters are met in a cost effective manner.
EI14	It is a Policy Objective: To implement the provisions of national and EU Directives on air and noise pollution and other relevant legislative requirements in conjunction with other agencies as appropriate. (Consistent with RPO 10.10 of the RSES) To maintain and manage a Dublin County ambient air quality monitoring network in conjunction with the EPA and TII and to make available to the public the resulting air quality measurements via the EPA website <a href="http://www.epa.ie/air/quality">www.epa.ie/air/quality</a> . To support the implementation of objectives of the 'Dublin Agglomeration Environmental Noise Action Plan 2018-2023'.
EI15	It is a Policy Objective to ensure that the design of external lighting schemes minimise the incidence of light spillage or pollution in the immediate surrounding environment and has due regard to the residential amenity of surrounding areas.
EI16	It is a Policy Objective to implement the provisions of water pollution abatement measures in accordance with national and EU Directives and other legislative requirements in conjunction with other agencies as appropriate.





**Table 2-3: Amendments to Pre-existing Plan Objectives/Policies**

Policy / Objective Reference	Policies/Objectives	Amendment
SDF6-1	<p>It is an Objective that a Masterplan for the entire site shall be prepared and accompany all planning applications for significant development on the site. The Masterplan shall accord with the Objectives set out in this Site Development Framework accompanied by a 'Consistency Statement' detailing how each of the Guiding Principles and objectives in this SDF will be delivered.</p> <p>The Masterplan shall include details of details of how development and infrastructure will be phased including the provision of different uses and services that will serve an emerging community.</p>	<p>It is an Objective that a Masterplan for the entire site shall be prepared and accompany all planning applications for significant development on the site. The Masterplan shall accord with the Guiding Principles and Objectives set out in this Site Development Framework accompanied by a 'Consistency Statement' detailing how each of the Guiding Principles and objectives in this SDF will be delivered.</p> <p>The Masterplan shall include details of details of how development and infrastructure will be phased including the provision of different uses and services that will serve an emerging community. <b>It must also be informed and guided by all relevant environmental considerations, including the need to manage and mitigate (where necessary) the potential effects development in this area may have on sensitive environmental receptors.</b></p>
SDF6-8	<p>Require a street planting strategy with suitable trees and planting along Enniskerry Road.</p> <p>Provide a green pedestrian/cycle link from Enniskerry Road across to the central green area and beyond. Development shall be designed to ensure passive surveillance of this link. Along this route as many of the key landscape features as possible must be retained and celebrated in order to respect and enhance the uniqueness of the place. Wherever possible, stands of trees should be retained and strengthened. The potential for these spaces to assist wildlife movement, a wide range of walking and cycling circuits and for providing open and play spaces should be explored.</p> <p>Ensure protection and retention of the double tree line/hedgerow which runs north-south and east-west across the lands.</p>	<p>Require a street planting strategy with suitable <b>native</b> trees and planting along Enniskerry Road.</p> <p>Provide a green pedestrian/cycle link from Enniskerry Road across to the central green area and beyond. Development shall be designed to ensure passive surveillance of this link. Along this route as many of the key landscape features as possible must be retained and celebrated in order to respect and enhance the uniqueness of the place. Wherever possible, stands of trees should be retained and strengthened. The potential for these spaces to assist wildlife movement, a wide range of walking and cycling circuits and for providing open and play spaces should be explored.</p> <p>Ensure protection and retention of the double tree line/hedgerow which runs north-south and east-west across the lands.</p>
KGLAP 39	<p>It is Policy to provide attractive, high-quality inclusive and connected walking and cycling networks with direct routes to local destinations and public transport hubs.</p>	<p>It is Policy to provide attractive, high-quality inclusive and connected walking and cycling networks with direct routes to local destinations and public transport hubs <b>and to ensure that such networks do not result in habitat fragmentation and reduced ecological connectivity.</b></p>



Policy / Objective Reference	Policies/Objectives	Amendment
GI3	It is an Objective to: • Allow the relevant wildlife corridor – Fernhill to Brides Glen corridor and Brides Glen corridor - as set out in the dlr County Biodiversity Action Plan 2021 - 2025 to inform decision making within the KGLAP area. • Identify opportunities to enhance and restore the Fernhill to Brides Glen corridor and Brides Glen corridor within the LAP lands.	It is an Objective to: • Allow the relevant wildlife corridor – Fernhill to Brides Glen corridor and Brides Glen corridor - as set out in the dlr County Biodiversity Action Plan 2021 - 2025 to inform decision making within the KGLAP area. • Identify opportunities to enhance and restore the Fernhill to Brides Glen corridor and Brides Glen corridor within the LAP lands <b>using best practice under the supervision of suitably competent professionals as deemed appropriate by the Planning Authority.</b>
GI4	It is an Objective to support the development and implementation of re-wilding projects on appropriate sites within the LAP and to promote the use of these sites for the enhancement and preservation of Biodiversity.	It is an Objective to support the development and implementation of re-wilding projects, <b>using best practice under the supervision of suitably competent professionals as deemed appropriate by the Planning Authority</b> , on appropriate sites within the LAP and to promote the use of these sites for the enhancement and preservation of Biodiversity.
GI5	It is an objective to support the community led sustainable recreation and rewilding project on lands to the north and northwest of Chapel Hill.	It is an objective to support the community led sustainable recreation and rewilding project on lands to the north and northwest of Chapel Hill <b>promoting best practice and the use of native species.</b>
OS2	It is an objective to develop sustainable and active travel connections to existing and planned open space and recreational facilities that whilst falling outside the KGLAP area can play a role in serving the current and future population including future Jamestown Park, Samuel Beckett Centre, Stepside sports facility –at the 8-acre field, Ticknick Park and Fernhill Park.	It is an objective to develop sustainable and active travel connections to existing and planned open space and recreational facilities that whilst falling outside the KGLAP area can play a role in serving the current and future population including future Jamestown Park, Samuel Beckett Centre, Stepside sports facility –at the 8-acre field, Ticknick Park and Fernhill Park. <b>The potential for habitat fragmentation as a result of the development of linear connection routes and the need to ensure ecological connectivity within and surrounding the Plan area shall be taken into consideration in the development of any connections.</b>
KGLAP51	It is Policy to support appropriate development that has regard to Kiltiernan-Glenamuck's historical past character while contributing new elements to add to its visual landscape.	It is Policy to support appropriate development that has regard to Kiltiernan-Glenamuck's historical past character while contributing <b>new built form</b> adding to its visual amenity.



### 3. CONSIDERATION OF ALTERNATIVES

#### 3.1 Introduction

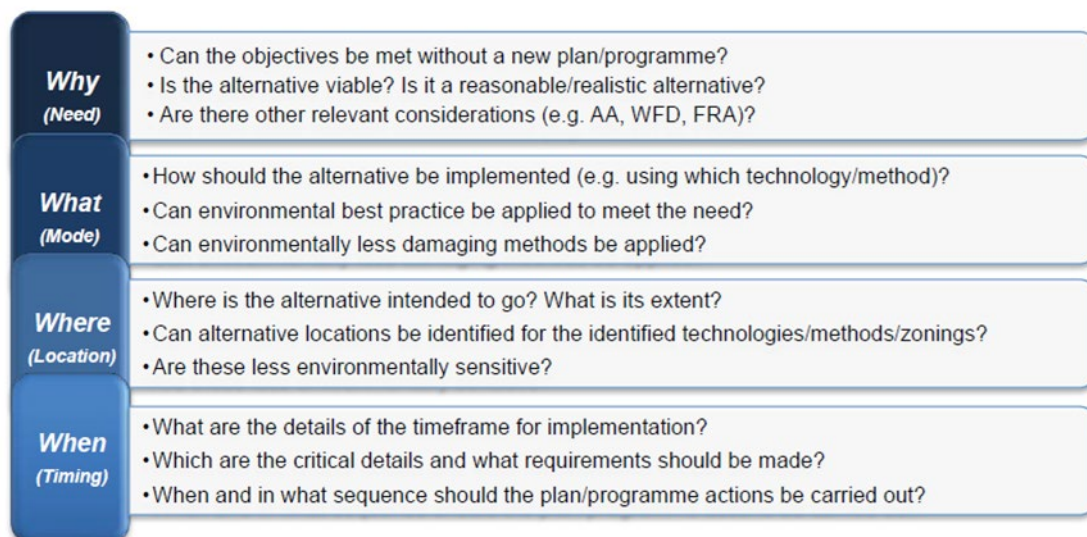
This section provides an overview of reasonable Plan alternatives considered during the plan-making processes. The environmental effects of reasonable alternative, including effects on biodiversity and European sites, were considered when choosing the preferred Plan.

#### 3.2 Approach to Developing Reasonable Alternatives

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

1. Iterative communication was held between the Plan-development and environmental assessment teams to identify the various alternative approaches and options being considered to achieve the Strategic Aim and Objectives of the Plan.
2. Reasonable alternatives considered were identified. For an alternative to be considered reasonable, it must be practical/functional, realistic and implementable. An evaluation of whether each alternative was practical/functional, reasonable and implementable took place. This evaluation considered the following factors:
  - The strategic aim and objectives of the Plan.
  - The geographic scope of the Plan.
  - The actual powers and functions of the Local Authority.
  - The genuine ability of the alternative to achieve the Plan aims and objectives.
  - The technical feasibility of the alternative.
  - The availability of resources, including financial resources to deliver the Plan within the required timeframe.
  - The policy hierarchy and the parameters placed around the Plan by higher-level policy.
  - The legislative context and the parameters placed around the Plan by climate action and environmental related legislation.

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



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

### 3.3 Identification and Description of Reasonable Alternatives

Reasonable alternatives to the Plan were identified as the Plan-making process evolved, having regard to the scope, function and strategic aims and main objectives of the Plan. This process facilitated the accurate identification of reasonable alternatives to the Plan and also suitably informed the plan-development process, ensuring optimal environmental outcomes. An evaluation of the potential effects of the reasonable alternatives on the baseline environment was carried out in accordance with the SEA Directive and best practice guidelines. A description of these reasonable alternatives and the reasons for selecting these reasonable alternatives are presented in Tables 3-1 and 3-2.

A 'Do Nothing' or 'Do Minimum' alternative was not a reasonable alternative in this instance as the preparation a County Development Plan is a statutory requirement in this instance under Section 19(1) of the Planning and Development Act 2000 (as amended).





**Table 3-1: Reasonable Alternatives considered during the Plan-making Process**

Theme	Description of Reasonable Alternative
Kiltiernan-Glenamuck Local Area Plan Boundary	Alternative 1: Retain the Kiltiernan-Glenamuck Local Area Plan Boundary defined in the Dun Laoghaire-Rathdown County Development Plan 2022-2028.
	Alternative 2: Extend the Kiltiernan-Glenamuck Local Area Plan Boundary to the south and southeast of the boundary previously defined in the Dun Laoghaire-Rathdown County Development Plan 2022-2028.
Residential Density	Alternative 1: Allow for consideration of residential densities in excess of 80 dwellings per hectare.
	Alternative 2: Don't allow for consideration of residential densities in excess of 80 dwellings per hectare.
Transport Planning	Alternative 1: Implement recommendations of the Area Based Transport Assessment completed for the Kiltiernan-Glenamuck Local Area Plan.
	Alternative 2: Don't implement recommendations of the Area Based Transport Assessment completed for the Kiltiernan-Glenamuck Local Area Plan.
Neighbourhood Centre Land Use	Alternative 1: Expressly provide for an appropriate multifunctional mix of residential/ commercial/ retail/ community service uses in the new neighbourhood centre.
	Alternative 2: Don't expressly provide for an appropriate multifunctional mix of residential/ commercial/ retail/ community service uses in the new neighbourhood centre.

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

An evaluation of the potential effects of the reasonable alternatives on the baseline environment was carried out in accordance with the SEA Directive and best practice guidelines. This evaluation is documented in the SEA Environmental Report for the Plan. AA considerations were taken into account during this evaluation process. A summary of this evaluation and the reason for choosing the preferred Plan is presented in Table 3-2.



**Table 3-2: Evaluation of Reasonable Alternatives**

Theme	Description of Reasonable Alternatives	Preferred Alternative	Reasons for Selecting the Preferred Alternative
Kiltiernan-Glenamuck Local Area Plan Boundary	Alternative 1: Retain the Kiltiernan-Glenamuck Local Area Plan Boundary defined in the Dun Laoghaire-Rathdown County Development Plan 2022-2028.	Alternative 2	Expanding the LAP boundary to the south and southeast of the current boundary will allow DLR to define objectives to protect and/or improve amenity of lands in these areas, potentially resulting in a range of positive effects on various environmental components e.g., (Population and Human Health, Biodiversity, Landscape and Visual Amenity etc.)
	Alternative 2: Extend the Kiltiernan-Glenamuck Local Area Plan Boundary to the south and southeast of the boundary previously defined in the Dun Laoghaire-Rathdown County Development Plan 2022-2028.		
Residential Density	Alternative 1: Allow for consideration of residential densities in excess of 80 dwellings per hectare.	Alternative 1	Allowing for residential densities in such cases has the potential to generate a range positive environmental effects by comparison to not allowing for these increased densities. This alternative supports compact growth, has potential to result in better environmental outcomes and considers the potential for future public transport improvements in and around the area.
	Alternative 2: Don't allow for consideration of residential densities in excess of 80 dwellings per hectare.		
Transport Planning	Alternative 1: Implement recommendations of the Area Based Transport Assessment completed for the Kiltiernan-Glenamuck Local Area Plan.	Alternative 1	Integrating the ABTA recommendations into the LAP has the potential to ensure a greater level of positive environmental outcomes – across a number of environmental components and will drive sustainable transportation at local level, potentially resulting in positive effects on climate, population and human health etc.  Implementing the ABTA recommendations will ensure the Draft LAP better aligns with higher order policy supporting sustainable transportation, such as the National Sustainable Mobility Policy and the Sustainable Mobility Policy Action Plan 2022 – 2025.
	Alternative 2: Don't implement recommendations of the Area Based Transport Assessment completed for the Kiltiernan-Glenamuck Local Area Plan.		
Neighbourhood Centre Land Use	Alternative 1: Expressly provide for an appropriate multifunctional mix of residential/ commercial/ retail/ community service uses in the new neighbourhood centre.	Alternative 1	Expressively providing for a suitable multi-functional neighbourhood has the potential to lead to better environmental outcomes, such as the promotion of sustainable transportation, delivery of enhanced traffic and transport conditions, positive effects on climate, local air quality and population and human health etc.
	Alternative 2: Don't expressly provide for an appropriate multifunctional mix of residential/ commercial/ retail/ community service uses in the new centre.		



## 4. AA CONCLUSION

A report to inform AA Screening was previously completed for a draft version of the LAP. The purpose of this report was to identify whether the implementation of the LAP has the potential to have likely, significant effects on the integrity of European sites, alone or in-combination with other plans and projects.

It was concluded that the Draft Plan was likely to have significant effects on 7 no. European sites forming part of the Natura 2000 network (in the absence of mitigation), either alone or in combination with other plans and projects. These European sites are as follows:

Site Code	Site Name
004040	Wicklow Mountains SPA
004024	South Dublin Bay and River Tolka Estuary SPA
003000	Rockabill to Dalkey Island SAC
004172	Dalkey Islands SPA
004006	North Bull Island SPA
004236	North-west Irish Sea SPA
004186	The Murrough SPA

The LAP provides a land use planning framework for the Plan Area and supports various types of development, including housing and transport development. The implementation of LAP policies and objectives, which are supportive of various forms of development, has the potential to result in likely significant effects on European sites from the following: loss/reduction of habitat area; habitat or species fragmentation; disturbance to key species; reduction in species density; changes in key indicators of conservation value (water quality etc.); and climate change.

DLR therefore determined that an AA of the LAP was required and that a Natura Impact Report be prepared for the LAP.

An NIR was produced for the Draft LAP. The NIR considered the potential for the Draft LAP to adversely affect the integrity of European sites, with regard to their Qualifying Interests and Special Conservation Interests. The Draft LAP was informed by the AA and the NIR. Mitigation measures were integrated into the Draft LAP that mitigate its potential effects on any European site. The NIR concluded that the Draft LAP would not give rise to any adverse effects on European sites, alone or in combination with other plans or projects.

Amendments to the Draft LAP were made following a review of the issues raised during a period of prescribed public consultation period for the Draft LAP. A Report to Inform AA Screening was completed for these amendments to the Plan and it was concluded that these Amendments would not be likely to have any significant effect on European sites.



A consolidated NIR was produced for the LAP. This consolidated NIR concluded the following:

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





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