

DUBLIN CITY COUNCIL

SCREENING TO DETERMINE THE NEED FOR STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) OF:

DUBLIN CITY COUNCIL STRATEGIC HERITAGE PLAN 2023 – 2028 (DRAFT)

Pursuant to the European Union Directive 2001/42/EC, and,
European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435/2004 as amended by S.I. No. 200/2011).

1.0 Legislative Background and Guidance Documents

The purpose of this screening report is to determine, in accordance with the European Union Strategic Environmental Assessment (SEA) Directive (2001/42/EC), whether or not the proposed Dublin City Strategic Heritage Plan 2023 - 2028 (hereinafter referred to as the Heritage Plan) would result in significant environmental effects and would require a Strategic Environmental Assessment taking into account the relevant criteria set out in Annex II of the Directive 2001/42/EC.

Dublin City Council is preparing a city wide non-statutory heritage plan. The plan will set out Dublin City Council's heritage (archaeology, built heritage and cultural heritage) values and strategic goals in the city up to 2028, along with strategic objectives and outcomes and projects.

SEA involves assessment of the environmental effects of plans and programmes at a strategic level. The EU Directive (2001/42/EC) requires that environmental assessment be carried out for all plans and programmes (P/P's) that are prepared for certain specified sectors and land use plans. Screening for SEA is required for other plans that fall below the specified thresholds.

The Heritage Plan is a non- statutory plan and potentially a land use plan. In line with the EPA document 'Good Practice Guidance on SEA Screening', 2021, where there is uncertainty as to whether the SEA Directive may apply it is appropriate to proceed to Stage 2 Screening.

2.0 Layout of Report

Section 3.0 below describes the characteristics of the proposed Heritage Plan. Section 4.0 references the parallel assessment under Article 6(3) of the EU Habitats Directive. Section 5.0 screens the Plan to ascertain if it is likely to have significant effects on the environment in accordance with the requirements of SEA under the Directive and Regulations. Section 6.0 sets out the Council's proposed determination and Section 7.0 lists the environmental authorities consulted on the proposed determination and summarises their submissions and give responses to same. Section 8.0 sets out the final determination by the Council.

3.0 The Proposed Dublin City Strategic Heritage Plan 2023 - 2028

In keeping with the Council's ongoing commitment to investing in the city's heritage, in all its diversity, the new Dublin City Strategic Heritage Plan 2023-2028 will adopt a broad remit - embracing cultural heritage in all of its aspects; tangible, intangible and digital.

The plan will guide the work of the Heritage Officer in collaboration with other Council departments and external partners and collaborators. While the Strategic Heritage Plan will be delivered by Dublin City Council, in partnership with the Heritage Council and other key partners, it will support the work of other organisations in different areas of Dublin city's heritage.

The Heritage Plan establishes a framework for heritage work by DCC up to 2028. This Heritage Plan is based around the values of:

1. Diversity and Inclusion
2. Creative Collaboration
3. Promoting Best Practice
4. A Broader Definition of Heritage (A Holistic Approach)

Six **key strategic goals** have been developed and each strategic goal is supported by **Strategic Objectives** to progress the goal, and **Outcomes**, to measure success. The strategic goals and objectives are outlined below:

Key Strategic Goals:

COMMUNITY-LED AND LOCALLY-FOCUSED

Strategic Objectives:

- 1) Produce a toolkit for the development of local heritage projects in partnership with area offices, including information on how to access existing council-produced resources and interpretative materials.
- 2) Support heritage participation and engagement through the development of community-led local heritage plans, co-created and implemented with local community groups and supported by the City Council.
- 3) Develop an annual local heritage grant scheme to support cultural heritage activities identified in local heritage plans.
- 4) Support community-led projects (from communities of place and of interest) and work collaboratively with existing community organisations, building on and learning from the important work that they are already doing.
- 5) Support capacity building projects and events within communities of place and interest, and facilitate the sharing of knowledge and experience between communities.

MAKING ROOM FOR DIVERSE VOICES

Strategic Objectives

- 1) Develop thematic and multidisciplinary heritage projects that include intangible cultural heritage as an integral component. Support thematic projects that explore concepts and practices that are common to all traditions.
- 2) Work with partner organisations to support community-led heritage projects from historically marginalised communities.
- 3) Support projects that view existing heritage resources in a new light or from a previously unexplored perspective. Allow for projects that challenge existing heritage narratives.
- 4) Support projects that explore the heritage of communities of interest and community-based action.
- 5) Support projects that explore the long history of inward and outward migration to/from Dublin.

CREATING KNOWLEDGE

Strategic Objectives

- 1) Build on the success of the previous heritage plan to progress existing built, archaeological and cultural heritage research projects and to identify new ones.
- 2) Continue to identify and collect baseline built, archaeological and cultural heritage data (basic research, thematic surveys and reports) and to archive this data according to best practice guidance.
- 3) Collaborate with strategic partners to: carry out reviews of existing data and research, to identify gaps and emerging themes; put research strategies in place for individual subject areas; and to review funding opportunities for built, archaeological and cultural heritage-focused research, at national and international level.
- 4) Support and develop projects that allow for the collection of oral histories, social memory and personal or family artefacts.
- 5) Support and develop projects that illustrate the contribution that built, archaeological and cultural heritage can make to sustainability, including the UN Sustainable Development Goals, and to addressing the impacts of climate change.

ACCESS TO HERITAGE

Strategic Objectives

- 1) Build on projects implemented under the previous Heritage Plan to continue to make heritage data available as an online resource. Work with existing and new geospatial platforms as required to map published and unpublished heritage data.
- 2) Ensure that access and issues relating to access are fully considered in all built, archaeological and cultural heritage projects carried out under the remit of the Strategic Heritage Plan.
- 3) Collaborate with groups and individuals who have experienced barriers to accessing or celebrating heritage to identify ways in which improved access can be achieved. Work with groups and individuals to develop tailored opportunities and supports.
- 4) Develop and support projects and initiatives that value and embrace intangible cultural heritage, including the heritage of living practices.

HERITAGE MANAGEMENT

Strategic Objectives

- 1) Promote best practice in built, archaeological and cultural heritage in Dublin City, through guidance, and CPD-accredited training initiatives.
- 2) Continue to resource the review and ongoing implementation of existing conservation (management) plans and put funding in place to undertake and implement new plans for built, archaeological and cultural heritage places and sites in Dublin City. As part of this objective:
 - a. Encourage the use of the conservation (management) plan process by both the private and community sectors for places and sites not in state ownership.
 - b. Identify and record places or building typologies of particular interest or vulnerability in Dublin City, in both public and private ownership, that would benefit from the conservation plan process.
- 3) Identify threats to Dublin's built, archaeological and cultural heritage as a result of climate change and as a result of climate adaptation measures. Provide guidance on the management of vulnerable heritage resources and advice on appropriate mitigation measures.
- 4) Encourage the participation of community groups in actively managing Dublin's built, archaeological and cultural heritage, including participation in national community heritage schemes.

COMMUNICATING HERITAGE

Strategic Objectives

- 1) Develop a dedicated Dublin heritage website to provide access to heritage information and data and to updates on the work of the Dublin City Strategic Heritage Plan.
- 2) Continue to disseminate high-quality information on Dublin's built, archaeological, and cultural heritage through different means and media including exhibitions, pamphlets, publications, lectures and training.
- 3) Collaborate with strategic partners to develop quality approaches to the interpretation of local and national built, archaeological and cultural heritage, based on sound research.
- 4) Collaborate with strategic partners to produce and disseminate information that highlights the value of heritage to economic development, social wellbeing and environmental sustainability.
- 5) Support the development and interpretation of collections that are representative of Dublin's artistic, built, archaeological and cultural heritage.

In order to implement the strategic objectives set out in the heritage plan, actions are to be identified. These actions will be achieved by means of a Heritage Forum (to be set up) and an annual Heritage Action Plan (to be prepared by the Heritage Forum each year).

The proposed heritage plan identifies potential heritage projects and these heritage projects will be concerned with: recording, collecting / dissemination, interpretation, coordination / management / monitoring, promotion, education, communication, best practice, access, experience, participation, engagement, sustainability / adaptation (climate) and funding.

The projects to be developed, will be carried out through programmes, publishing, mapping, digitising (information) / archiving, collaboration, plans / guidelines, studies / surveys / audits, conservation management plans (e.g. bridges / public sculpture), public engagement / events, strategies (reuse), courses / initiatives.

4.0 Appropriate Assessment

An assessment under Article 6(3) of the EU Habitats Directive has also been undertaken in conjunction with this SEA Screening report and should be read in tandem with this report and the Heritage Plan (draft). A finding of no likely significant effects on the conservation management objectives of European Sites has been concluded.

5.0 Criteria for determining whether the proposed DCC Strategic Heritage Plan is likely to have significant effects on the environment.

The table below presents the SEA screening assessment of the Heritage Plan against the criteria provided in Annex II of the SEA Directive and Schedule 1 of S.I. No. 435 of 2004. This provides the basis for determining whether a plan or programme is likely to have significant effects on the environment.

Table 1: Relevant criteria set out in Annex II of the Directive 2001/42/EC and Schedule 1 of S.I. No. 435 of 2004

1. THE CHARACTERISTICS OF THE PLAN HAVING REGARD IN PARTICULAR TO:

The degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions, or by allocating resources;

The proposed DCC Strategic Heritage Plan is a strategic plan, the purpose of which is to set out a framework for coordinated heritage conservation and management (archaeology, built heritage and cultural heritage) in the city up to 2028, in collaboration with other agencies / partners / citizens in the context of specific strategic goals, objectives and projects.

The heritage plan is not a statutory plan. It will not direct development, it does not have direct land use implications and it will not set a framework for projects with a land use effect such as location, nature, size or operating conditions. Similarly the plan does not set a framework for future development consents.

Aside from identifying the need for conservation management plans for the City Walls, River Liffey Bridges and historic public sculpture on O'Connell Street and College Green, the plan does not specify locations for projects.

Projects arising from the Plan must comply with relevant legislation, policies, plans and programmes that form the statutory decision-making and consent granting framework.

The degree to which the plan influences other plans, including those in a hierarchy.

The proposed heritage plan sits under Heritage Ireland 2030 in a hierarchy.

Heritage Ireland 2030 identifies local heritage plans as one mechanism for the delivery of national heritage policy.

According to Heritage Ireland 2030, a local heritage plan is a five-year strategic action plan for the identification, conservation, management, promotion and interpretation of heritage.

Action 148 of Heritage Ireland 2030 seeks to:

'Continue the preparation and implementation of County/City Heritage Plans and resource their implementation with a view to maximising their effectiveness and assistance in the delivery of Heritage Ireland 2030'.

The DCC Heritage Plan is at city scale but is a non-statutory local / city heritage plan. The plan has been written in the context of national and regional statutory and non-statutory plans and strategies, and international charters and conventions. The proposed Heritage Plan represents a strategic

approach to the management of heritage in the city that is underpinned by both National and local heritage policy.

The Heritage Plan does not set a consenting framework for lower levels plans or projects.

The relevance of the plan for the integration of environmental considerations, in particular with a view to promoting sustainable development.

The overall aim of the heritage plan is to provide a framework for coordinated and inclusive heritage (archaeology, built heritage and cultural heritage) conservation and management.

It seeks to guide DCC heritage related activities and it sets out a framework for heritage activity in the community and for state agencies with a role in DCC heritage. The plans' values, strategic goals and objectives and consequent projects are positive in relation to environmental receptors such as cultural heritage, population and human health, and landscape as they seek to identify, conserve, manage, promote and interpret the city's heritage .

The plan also seeks to focus on the impacts of climate change on heritage resources and the contribution of heritages resources can make to mitigating the effects of climate change.

The heritage plan is therefore positive in relation to these SEA parameters / environmental receptors and relevant in relation to contributing to and promoting sustainable development.

Environmental problems relevant to the plan.

Existing issues, pressure and threats affecting the cultural heritage resource in Dublin City include development and climate change (i.e. damage due to severe weather events).

Archaeology and Built Heritage is largely subject to or protected by legislation / statutory land use plans. The city's cultural heritage is addressed under the Dublin City Development Plan 2016 – 2022 / Dublin City Council Development Plan 2022-2028.

In terms of climate change the plan states that projects delivered under the plan will be undertaken in accordance with:

- Dublin City Council Climate Change Action Plan 2019-2024.
- Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage.
- Climate Action and Low Carbon Development (Amendment) Act 2021.

Other Environmental problems in the city related to biodiversity, population, human health, soil, water, air, material assets, etc are not relevant to this plan.

The relevance of the plan for the implementation of Community European Union legislation on the environment (e.g. plans linked to waste management or water protection).

The Heritage Plan will focus on archaeology / built heritage and cultural heritage. The plan is not directly relevant to any European Union legislation on the environment and will not assist in the roll out of other environmental legislation e.g. RBMP or RWMP.

2. CHARACTERISTICS OF THE EFFECTS AND OF THE AREA LIKELY TO BE AFFECTED, HAVING REGARD, IN PARTICULAR, TO:

The probability, duration, frequency and reversibility of the effects.

The heritage plan will set out strategic goals, strategic objectives and outcomes and strategic projects to coordinate heritage management and conservation up to 2028.

There are no specific land use effects identified through the plan's strategic goals, objectives, outcomes and projects, with all of them likely generating non-significant, positive, long-term and synergistic effects across a range of SEA parameters, particularly for cultural heritage.

It is not considered that there will be negative effects associated with the implementation of the plan.

Should conflicts arise from the Heritage Plan, these will be subject to full planning and environmental assessment consent and consistent with environmental protective legislation.

The cumulative nature of the effects.

It is considered that the effects of the heritage plan will be non-significant, positive, long-term and cumulative in nature.

Projects arising from the Heritage Plan will be subject to more detailed project level assessment and in compliance with the statutory planning and environmental consenting regime. At this strategic, city scale no potential for adverse cumulative effects is identified as a result.

The transboundary nature of the effects.

At this strategic, city scale no potential for transboundary effects are identified for the Plan.

The risks to human health or the environment (e.g. due to accidents).

There is no likelihood of any significant impacts to human health or the environment as a result of the implementation of the Plan. Actions relating to the public are positive in relation to human health and wellbeing as it aims to create public awareness regarding the city's heritage and within some projects, aims to engage with the community.

The magnitude and spatial extent of the effects (geographical area and size of population likely to be affected).

The Heritage Plan is at city scale and it will focus on city wide archaeology / built heritage and cultural heritage. Implementation and achievement of the plan's strategic objectives and proposed projects in the Heritage Plan are identified to create positive, in combination effects in particular for cultural heritage.

The plan's strategic objectives and projects do not provide any geographic specificity regarding their scope of application. This fact and the nature of the proposed objectives and projects types would support a conclusion that there would not be likely significant effects on the environment.

Should detailed projects arise from the plan these would be subject to planning and environmental consent as appropriate.

**The value, and vulnerability of the area likely to be affected due to:
(a) special natural characteristics or cultural heritage;**

The Plan aims to raise awareness of and build capacity across the heritage sector. As it does not have any direct land use implications, the Plan does not directly impact any Natura 2000 sites, pNHAs or locally important biodiversity sites but aims to broadly improve the status of archaeological or built heritage and the city's cultural heritage.

A screening statement in support of Appropriate Assessment has also been prepared for this plan in line with Article 6(3) of the EU Habitats Directive (92/43/EEC). A finding of no likely significant effects has been concluded as part of this screening statement in support of Appropriate Assessment.

(b) exceeded environmental quality standards or limit values;

Not applicable - the plan should be beneficial for the city's heritage (archaeology, built and cultural heritage).

(c) intensive land use

No specific areas are identified for land use effects or development activities in the plan. A number of proposed projects in the Heritage Plan that have cultural heritage implications aim to record and manage cultural heritage city wide. Such projects are positive in relation to planning and conserving heritage.

The effects on areas or landscapes which have a recognised national, European Union or international protection status.

A screening statement in support of Appropriate Assessment has been prepared in tandem with this SEA Screening. This concludes that the Plan is not likely, alone or in-combination with other plans or projects, to have a significant effect on any European Sites in view of their Conservation Objectives.

6.0 Proposed Determination

It is considered that the proposed heritage plan as detailed in Section 3.0 above is not likely to have significant effects on the environment for the reasons outlined in Section 5.0 of this report. In view of the above it is concluded that the proposed Strategic Heritage Plan would not be likely to have significant effects on the environment and therefore that a strategic environmental assessment is not required.

7.0 Statutory Consultation

In line with SI 435 of 2004/2011, as amended, a SEA Screening Report and proposed determination was issued (25th November 2022) to the specified environmental authorities listed below for consultation over a four week period.

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage
- Minister for Environment, Climate and Communications; and
- Minister for Agriculture, Food and the Marine.
- Adjacent Local Authorities

Table 2 below summarises the submissions and responses to same.

Table 2 Submissions from Environmental Authorities and Response

Environmental Authority	Submission	Comment
EPA Submission received 6 th December 2022	<p>Submission noted the role of the EPA as one of the Environmental Authorities and provided a list of recommended guidance and resources including:</p> <ul style="list-style-type: none"> ▪ Environmental Sensitivity Mapping (ESM) Webtool. Available at: www.enviromap.ie ▪ EPA SEA Web GIS Tool. Available at: https://gis.epa.ie/EPAMaps/SEA ▪ EPA WFD Application. Available at: https://wfd.edenireland.ie/ and www.catchments.ie ▪ EPA AA Geo Tool. Available at: http://www.epa.ie/terminalfour/AppropAssess/index.jsp and https://gis.epa.ie/EPAMaps/AAGeoTool ▪ SEA of Local Authority Land Use Plans - EPA Recommendations and Resources'. 2022 Version 1.18. 	Guidelines & resources, where relevant are considered within the assessment

	<p>Future amendments to the plan should be screened and the final SEA determination should be put on public display and sent to the environmental authorities.</p>	<p>Noted.</p>
<p>Geological Survey Ireland (GSI) Under DECC Submissions received 20th December 2022</p>	<p>GSI recommends the use of various GIS data sets (as listed in the submission), when conducting the EIAR, SEA, planning and scoping processes. In addition it makes the following comments:</p> <p>Geoheritage</p> <p>GSI have identified important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). These have been adopted in the National Heritage Plan. 12 individual sites are identified for Dublin City. GIS encourage Dublin City to include these sites as 'natural heritage' within the Strategic Heritage Plan.</p> <p>Culture and Tourism</p> <p>GIS would encourage Dublin City Council to promote the geological value of the sites tourists visit. Geological Survey Ireland would welcome the opportunity to partner with Dublin City Council in the development of geological or geological heritage interpretation in the form of walks, signage or information sites.</p> <p>Dimension Stone/Stone Built Ireland</p> <p>Geological Survey Ireland has considerable databases on Dimension Stone and the sources for suitable replacement stone in restoration work. The 'Stone Built Ireland' project may assist in particular in developing projects for Dublin City Council's Tourism Strategies and could be covered under a theme such as Architectural Heritage or similar.</p> <p>Marine and Coastal Unit</p> <p>Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national marine mapping programme which provides key baseline data for Ireland's marine sector. The programme delivers a wide range of benefits to multi-sectoral end-users across the national blue economy. A</p>	<p>The City Development Plan 2022 – 2028 lists & recognises the importance of City Geological Sites and seeks to protect the character and integrity of these sites' features (Objective GIO12).</p> <p>Comments on Culture and Tourism / Dimension Stone and the Marine and Coastal Unit are noted and DCC would welcome submissions on these aspects of Geological heritage as part of the public consultation exercise on the proposed</p>

	<p>suite of mapping products, a database of shipwrecks relevant to the city, seabed mapping products and storymaps are available on the GIS website and Map Viewer. GIS is also involved in mapping coastal erosion and vulnerability and is developing a Coastal Vulnerability Index (CVI) to aid climate adaptation.</p>	<p>Heritage Plan.</p>
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8.0 Final Determination

Screening for Strategic Environmental Assessment (SEA) Determination under SEA Directive 2001/42/EC and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 /2011.

CONCERNING DUBLIN CITY COUNCIL'S PROPOSED STRATEGIC HERITAGE PLAN

This determination has been made by Dublin City Council relating to the potential for the Dublin City Council's proposed Strategic Heritage Plan to have likely significant effects on the environment.

This determination has been made following consideration of the information contained in the SEA Screening Report (as set out above), criteria set out in Schedule 1 to S.I. 435 of 2004, as amended, consideration of the Appropriate Assessment (AA) Screening Conclusion (attached to this determination) and to the consultation responses received from the Environmental Protection Agency and Geological Survey Ireland (part of the Department of Environment, Climate and Communications), and finally to the proposed Strategic Heritage Plan. The responses received did not recommend that an SEA should be undertaken.

Following an analysis and evaluation of the relevant information, including the nature of the proposed plan and its potential for effects on the environment that could result from the implementation of the plan, it is considered that that the proposed Strategic Heritage Plan would not be likely to have significant effects on the environment.

I hereby recommend that a determination for the need for a Strategic Environmental Assessment be made for the purposes of the SEA Directive 2001/42/EC and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 /2011, that SEA is not required for the Proposed Dublin City Council Strategic Heritage Plan.



City Planner

Order: Having considered the information above and the conclusion of the City Planner, I agree with the reasoning and conclusion presented and recommend that it is determined for the purposes of the SEA Directive 2001/42/EC and the Planning and Development (Strategic Environmental Assessment) Regulations 2004/ 2011, that SEA is not required for the Proposed Dublin City Council Strategic Heritage Plan.



Assistant Chief Executive



Date

To whom the appropriate powers have been delegated by order of the Chief Executive Dublin City Council dated 2nd February 2023.