

STRATEGIC ENVIRONMENT ASSESSMENT (SEA)

SCREENING REPORT

Proposed Variation (No. 28) of Dublin City Development Plan 2016-2022;

To amend objective MT031 (from Chapter 8: Movement and Transport) to include for a pedestrian/cycle bridge across the River Liffey, from the Irish National War Memorial Gardens (INWMG) / Islandbridge to the Chapelizod Road (the R109)

1. Preliminary:

The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (SI No. 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004). Both sets of Regulations became operational on 21st July 2004. The Regulations have been amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (SI No. 200 of 2011) and the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (SI No. 201 of 2011).

2. Purpose of Report:

The purpose of this report is to consider whether the proposed draft variation of the Dublin City Development Plan 2016-2022 requires a SEA. The assessment is based on the criteria set down in Schedule 2A of the Planning and Development Regulations 2001, as amended, the DoEH&LG SEA Guidelines and Annex II of Directive 2001/42/EC.

3. Proposal:

It is proposed to vary the Dublin City Development Plan 2016-2022, Written Statement, Volume 1, by amending objective MT031 (from Chapter 8: Movement and Transport) to include for a pedestrian/cycle bridge across the River Liffey, from the Irish National War Memorial Gardens (INWMG)/Islandbridge to the Chapelizod Road (the R109).

From:

To:

MTO31: To initiate and/or implement the following road improvement schemes and bridges within the six year period of the development plan, subject to the availability of funding and environmental requirements and compliance with the 'Principles of Road Development' set out in the NTA Transport Strategy.

Roads

- River Road
- Richmond Road
- Malahide Road/R107 (including North Fringe Improvements)
- Blackhorse Avenue (commenced)
- Clonshaugh Road Industrial Estate
- Ballymun (improved town centre linkage)
- Kilmainham/South Circular Road
- Link from Military Road to Conyngham Road
- East Wall Road/Sheriff Street to North Quays
- Cappagh Road.

Bridges

- Dodder Bridge
- Liffey Valley Park pedestrian/cycle bridge
- Cycle/pedestrian bridges that emerge as part of the evolving Strategic
- Cycle Network and Strategic Green Infrastructure Network
- Three new bridges proposed as part of the North Lotts and Grand Canal Dock SDZ.

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This proposed draft variation is depicted on the attached map, an extract from Map E, Volume 3 of the Dublin City Development Plan 2016 – 2022, with three dots bridging the River Liffey from Office Public Works (OPW) lands at the Irish War Memorial Gardens (south of the River Liffey) to OPW lands located to the (north of the River Liffey) along the Chapelizod Road (the R109).

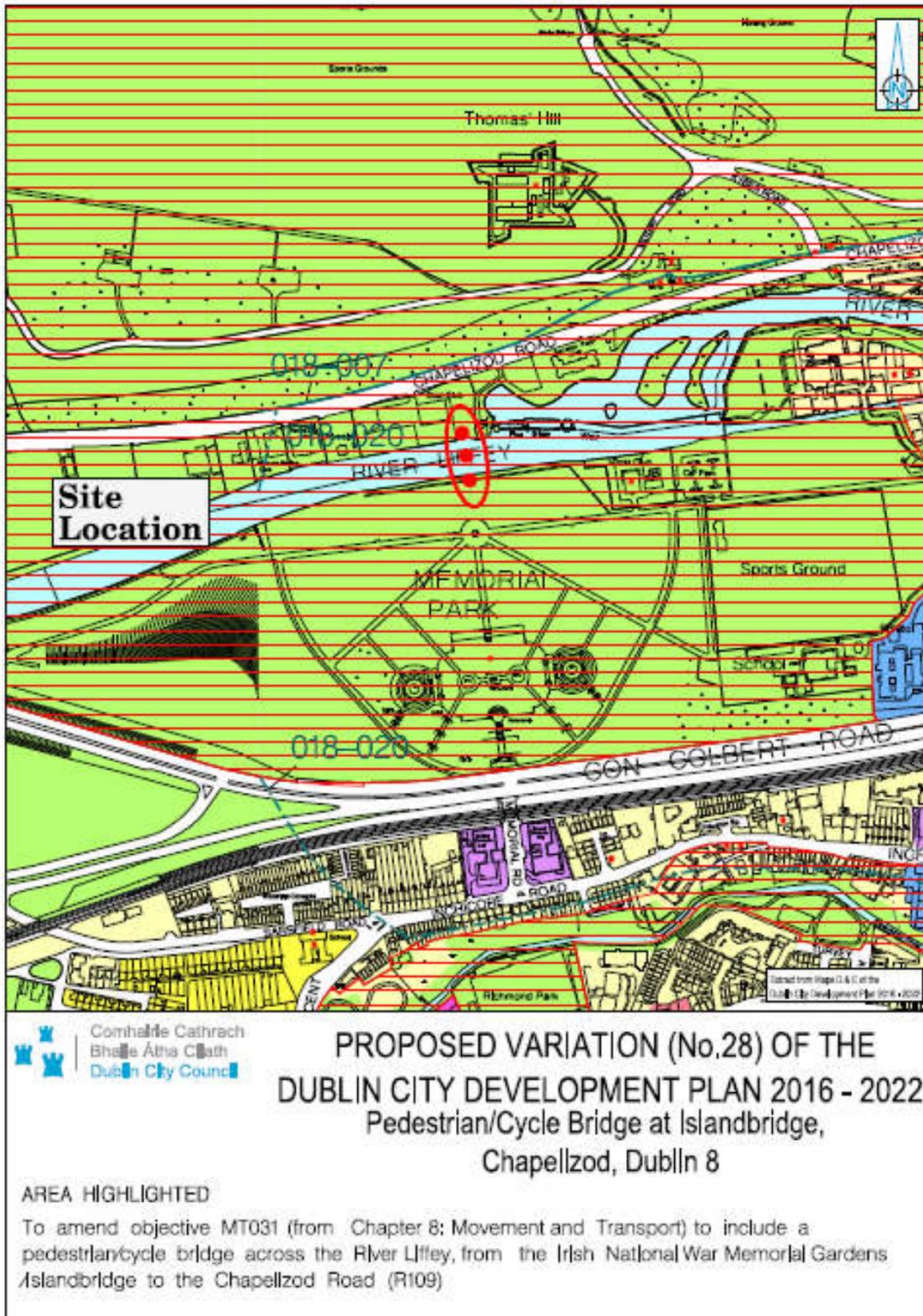


Fig. 1: Location of Proposed Variation (No. 28) to Dublin City Development Plan 2016-2022, Islandbridge, Dublin 8.

4 Further Detail on the Proposal:

The Irish National War Memorial Gardens (INWMG) are located on the south bank of the River Liffey at Islandbridge, approximately 6km west of Dublin city centre. The INWMG are located in the general vicinity of where the River Liffey becomes non-tidal at Islandbridge Weir. The Phoenix Park runs along the opposing, north bank of the

river. The Chapelizod Road (R 109) separates the north bank of the River Liffey from the Phoenix Park.

A palisade type metal fence currently forms the boundary between the OPW site on the north side of the River Liffey and the public pavement on Chapelizod Road. It is a strip of land that has been retained by the OPW for the purposes of bridging the River Liffey to connect, as far as is practicable, two significant OPW parkland sites, namely the Phoenix Park and the Irish National War Memorial Gardens. Several rowing clubs including Trinity College Boat Club (on the south side) and the University College Dublin (UCD) Boat Club (on the northside) are located within the vicinity of the INWVG.

Within the cityscape of Dublin, the INWVG are considered a “hidden gem”. Therefore, a principal objective of the proposed bridge will be to improve awareness of the INWVG. The proposed formal entrance at the Chapelizod Road will serve to act as a distinct access and egress point to the site. The proposed pedestrian/cycle bridge comprises:

- A new pedestrian and cycle bridge which will span the River Liffey and connect to an existing cycleway;
- A formal entrance at Chapelizod Road;
- An open plaza linking the entrance and bridge,

to be located at the INWVG and at lands to north of River Liffey, Chapelizod Road, Islandbridge, Dublin 8. In order to ensure the safe passage of pedestrians and cyclists across the Chapelizod Road to and from the proposed open plaza, a new pedestrian crossing will be required.

5 Explanation

The Planning Authority considers that it is appropriate to amend objective MTO31 (Chapter 8: Movement and Transport) to include a pedestrian/cycle bridge at the Irish National War Memorial Gardens/Islandbridge for the following reasons:

- The current Dublin City Development Plan promotes walking and cycling as healthy and sustainable forms of transport that can lead to improved levels of health in the community. In this regard, it is an Objective of Dublin City Council to:

*‘GIO4 in Chapter 10: Green Infrastructure, Open Space & Recreation
Improve pedestrian and cycle access routes to strategic level amenities while ensuring that ecosystem functions and existing amenity uses are not compromised and existing biodiversity and heritage is protected and enhanced.’*

- The Planning Authority recognises that investing in open spaces and recreational areas in urban areas creates a greater sense of community and helps combat social exclusion and isolation. Green infrastructure creates opportunities to connect urban areas and to provide appealing places to live and work. In this regard, it is an Objective of Dublin City Council to:

*'GIO14 (ii) in Chapter 10: Green Infrastructure, Open Space & Recreation
Protect and conserve the historic landscape of the Phoenix Park and its archaeological, architectural and natural heritage whilst facilitating visitor access, education and interpretation, facilitating the sustainable use of the park's resources for recreation and other appropriate activities, encouraging research and maintaining its sense of peace and tranquillity.'*

- Fig. 18 'Main Cultural Attractions' of the current Dublin City Development Plan identifies the INWMG as one of the city's key cultural attractions. It considers that the proposed bridge will contribute positively to the INWMG's tourism / cultural attraction status. The Bridge will act as pivot point with the potential to link recognised walking, cycling and military trails, connecting Kilmainham across the Liffey, on to the Phoenix Park and beyond.

Since the adoption of the Dublin City Development Plan in 2016, the OPW's ***The Irish National War Memorial Gardens Conservation Management Plan, 2018*** has been published. The Planning Authority has given consideration to the issue of access, as raised in the Management Plan for the Gardens. This proposed variation supports a more visible and high profile pedestrian and cyclist access point to the Gardens.

6 Requirements

In terms of the Regulations it is mandatory to undertake the screening process to determine whether or not to carry out a strategic environmental assessment as set out in Article 13K of the Regulations. An assessment of the proposed variation in terms of the criteria set out in Schedule 2A of the Regulations is set out below.

7 Assessment in terms of Schedule 2A of the Planning and Development (Strategic Environmental Assessment) Regulations 2004-2011

<p>THE CHARACTERISTICS OF THE PLAN HAVING REGARD IN PARTICULAR TO:</p>
<p>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;</p> <p>This is a proposed variation to Dublin City Development Plan 2016-2022. The variation is to amend objective MT031 to provide for a bridge crossing the River Liffey.</p> <p>The variation will set a framework for one minor infrastructural project (pedestrian/cycling bridge) and future activities (walking/ cycling etc).</p>
<p>The degree to which the plan influences other plans, including those in a hierarchy.</p> <p>As a variation to the City Development Plan, the variation is compatible and complementary with the strategies, policies and objectives of the development plan relating to the delivery of connected green spaces that support sustainable modes of transport and provide greater linkages between existing significant parkland areas</p>

such as the Phoenix Park and the Irish National War Memorial Gardens.

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

As a variation to the City Development Plan, the variation is being prepared under the Planning and Development Act 2000 (as amended) and therefore must adhere to the principles of proper planning and sustainable development.

The central ethos of the Plan is to provide for sustainable development including sustainable modes of travel in well-connected locations.

The variation will enable the provision of a minor piece of infrastructure that will enable a pedestrian/ cycling mode of transport connecting the north side of the River Liffey with the south side of the River Liffey providing access to two significant historical parklands identified as part of Dublin City Council's green routes and tourist trails.

Environmental problems relevant to the plan.

The main objective of the variation is to provide the policy context to enable a minor piece of infrastructure (pedestrian/cycle bridge) to connect two large areas of Z9 (open space) zoned lands. It is not considered that there will be any significant environmental problems generated by the variation (the 'plan').

The relevance of the plan for the implementation of European Union legislation on the environment (e.g. plans linked to waste management or water protection). These plans and programmes are considered under the City Development Plan 2016-2022. The proposed variation would only have relevance at local scale (if any) to the implementation of European Union legislation on the environment.

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.

It is considered that the characteristics of the effects of the proposed variation will be minimal and will largely be positive.

The cumulative nature of the effects.

It is considered that there will be minimal cumulative effect.

The transboundary nature of the effects. The variation site is located entirely within Dublin City Council. The proposed variation to the Development Plan will have no national, regional or inter-county transboundary effects.

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

proposed variation will not result in any risks to human health.

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

The variation site affects a limited area – a bridge span across the River Liffey at Island bridge. The proposed variation will provide the policy context to facilitate an OPW pedestrian/cyclist bridge connecting the Irish National War Memorials Gardens and the Phoenix Park. Effects of the variation on the subject site and in the wider environs will be minimal.

The value, and vulnerability of the area likely to be affected due to: (a) special natural characteristics or cultural heritage; The site area lies within a conservation area (red hatch). The future development proposal – a pedestrian/ cycling bridge, will be required to have regard to same under any future planning application. It is considered that the variation will facilitate the enhancement of the conservation status of the lands in question.

(b) exceeded environmental quality standards or limit values; It is not expected that any environmental quality standards will be exceeded or that the value of vulnerable areas limited as a result of the proposed variation.

(c) intensive land use The proposed variation provides the policy context for a minor piece of infrastructure (a pedestrian/ cycling bridge) that will connect two large existing historic parklands.

It is likely that there will be more footfall in the area given the connectivity that will be provided by the future bridge at this location. This variation provides the policy context for the proposed pedestrian/ cycling bridge.

The nature of the bridge provides a green mode of sustainable transport and thus in principle, accords with the principles of proper planning and sustainable development.

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

The purpose of this variation (a minor piece of infrastructure - a green mode pedestrian/cycling bridge) is to join two significant historical parklands by means of a River Liffey bridge from the Irish National War Memorial Gardens to the Phoenix Park along the Chapelizod Road at Islandbridge. The OPW have conservation management plans prepared for both parklands. The OPW will be the proposer of the linking bridge. The Irish National War Memorial Gardens are managed as a National Historic Park. This designation was given to highlight the historic elements to the Gardens but does not confer any legal protection.

The Phoenix Park is a historic landscape of international importance and one of the largest designed landscapes in any European city. It was originally established as a Royal deer park in the 17th century. Its status as a National Historic Park raises awareness of its significance but it is not supported by any internationally recognised designation.

8. Consultation

The EPA and the Department of Communications, Climate Action and Environment responded to the SEA Screening Notice on 23rd March 2020 and on 13th March 2020 respectively.

The EPA noted the Planning Authority's proposed determination that SEA will not be required for the proposed Variation and made the following specific comments:

- Recommend taking the EPA's guidance on the SEA process into account in finalising the SEA Screening Determination and incorporating the relevant recommendations as relevant and appropriate to the Variation.
- In proposing and in implementing the Variation, Dublin City Council should ensure that the Variation is consistent with the need for proper planning and sustainable development and adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Variation.
- In considering the Variation, Dublin City Council should take into account the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.
- Dublin City Council should also ensure that the Variation aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.
- In preparing the Variation and associated SEA screening, the recommendations, key issues and challenges described in the EPA's most recent State of the Environment Report Ireland's Environment – An Assessment 2016 (EPA, 2016) should be considered, as relevant and appropriate to the Variation.
- Available guidance and resources include the EPA's website, the Environmental Sensitivity Mapping Webtool, the EPA SEA WebGIS Tool, the EPA WFD Application and the EPA AA GeoTool.
- Ensure that the Variation complies with the requirements of the Habitats Directive where relevant. Where Appropriate Assessment is required, the key findings and recommendations should be incorporated into the SEA and the Variation.
- Under the SEA Regulations, prior to making the SEA determination a number of environmental authorities should also be consulted with including the Minister for Housing Planning and Local Government, the Minister for Agriculture, Food and the Marine and adjoining planning authorities.
- As soon as practicable after making a determination as to whether SEA is required or not, a copy of the decision, including, as appropriate, the reasons for not requiring an environmental assessment should be made available for public inspection in the Council's offices and on the Council 's website and a copy of the determination sent to the relevant environmental authorities consulted.

The Waste Policy and Resources Efficiency Division in the Department of Communications, Climate Action and Environment made the following comment:

- In respect of the issue of waste in the within documentation, the Division would be obliged if the Local Authority would consult directly with their respective Regional Waste Management Planning Office regarding the development of the final plans.

The EPA and the Department of Communications, Climate Action and Environment observations were taken on board by Dublin City Council in the finalisation of the SEA screening report.

9. Conclusion

This proposal has been examined in light of the criteria detailed in Schedule 2A and the City Council is of the view that the proposed variation does not require SEA. This decision is based on the consultation process conducted with the Environmental Authorities under the SEA Regulations and on the magnitude and spatial extent of the likely impact of the proposed variation, which are deemed not to be significant.

The Planning Authority has determined that an SEA is not required for the proposed variation to the Dublin City Development Plan 2016 – 2022.

Recommendation:

SEA procedure is not necessary for this proposed variation of the Dublin City Development Plan 2016 – 2022.

Vera Blake

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