

Appendix A15.1

Inventory of Archaeological and Cultural Heritage Sites

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Appendix A15.1: Inventory of Archaeological and Cultural Heritage Sites

1. Archaeological Heritage (AH) Sites

1.1 Introduction

The following is an inventory of AH sites identified along each section of the Proposed Scheme during the course of this assessment.

Unless stated otherwise in the entry, ITM locations are given for the centre point of each AH site.

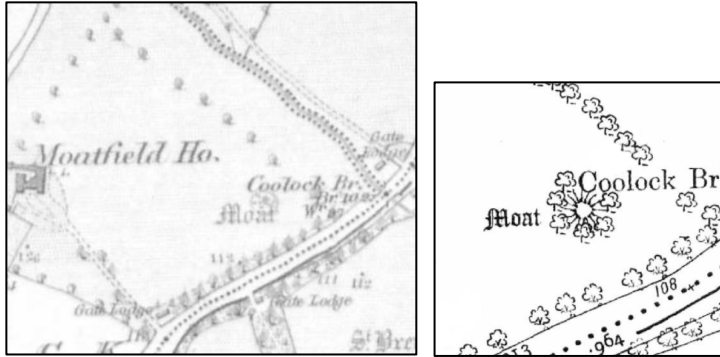

The locations of the AH sites are represented on the accompanying mapping (Figure 15.1 in Volume 3 of this EIAR). Where sites do not already have a designated number (e.g. Record of Monuments and Places (RMP), Sites and Monuments Record (SMR), Dublin City Industrial Heritage Record (DCIHR)), they are identified using the Proposed Scheme name (CBC0001) followed by an AH identification number (e.g. CBC0001AH001, CBC0001AH002, etc.).

'Approximate distance' in each entry is measured from the AH site to the red line boundary for the Proposed Scheme. Where an AH site is located immediately adjacent to the Proposed Scheme, but outside of it, a distance of 0m is given.


1.2 Inventory of Sites

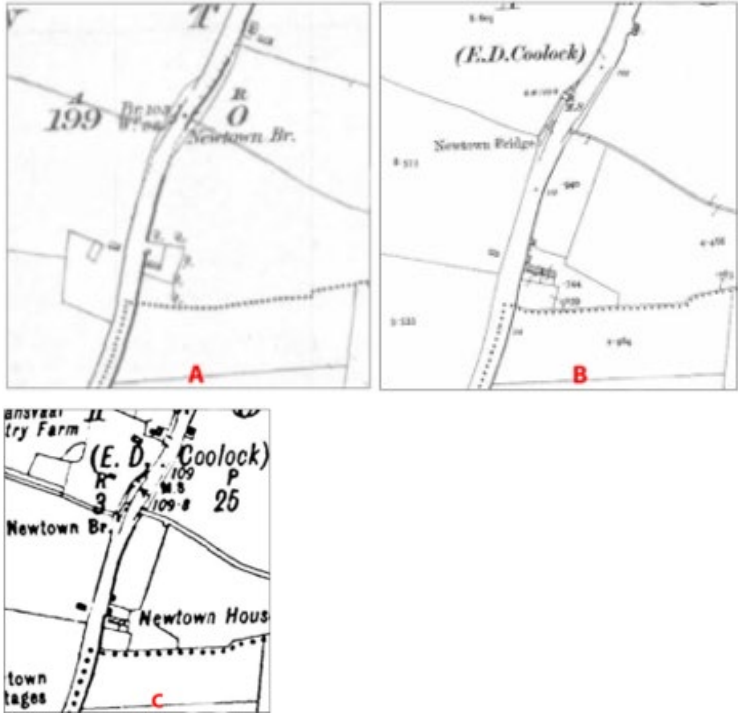
1.2.1 Mayne River Avenue to Gracefield Road - Malahide Road

Identification No.	DU015-074
Legal Status	RMP
Townland / Street Address	Grounds of Cadbury's Factory, Old Malahide Rd, Coolock
Site Type	Mound
ITM	719918, 739388
Description	<p>The ZAP for the RMP site is contained within the factory grounds, which are bounded by the Old Malahide Road. The tree-covered mound is located c. 30m north-west of the boundary railings and the edge of the Proposed Scheme. The mound was labelled 'Moat' on the first edition OS six-inch map (1843), suggesting it was thought to be an Anglo-Norman motte. At that time, and on the subsequent 25-inch OS map of 1906-09, it was set within the grounds of Moatfield House. Its small size makes the prospect of it being an Anglo-Norman motte unlikely and may instead indicate a prehistoric burial mound. Stanley (2011) suggests that this may be a Linkardstown-type burial, similar to those found elsewhere in Dublin (e.g. one excavated at Drimnagh in 1938 and another discovered in the Phoenix Park in 1838).</p> <p>Previous archaeological investigations in the vicinity of the mound, within the grounds of the factory have identified no archaeological material (Section 15.3.2.4 of Chapter 15). The Proposed Scheme runs immediately adjacent to the ZAP for the mound. It will not affect the setting of the recorded monument, which is well screened in its immediate setting within the Cadbury's Factory grounds. There is, however, the slight potential that associated or previously unknown archaeological deposits, features, or sites may be present below ground within the Proposed Scheme, where it runs past the mound. Ground-breaking works at the location for the proposed pocket park will impact on any archaeological features that may be present. The RMP site has a medium sensitivity value and the magnitude of impact is low, resulting in a slight impact.</p>



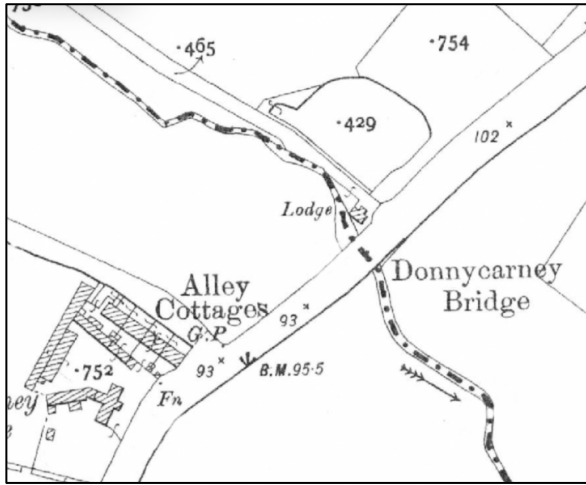
Sources	<p>NMS 2020. Stanley 2011. OSI 2020.</p>  <p>OS first edition six-inch map (1843), left, and OS 25-inch map (1906-09), right, showing mound at Cadbury's Factory (OSI 2020)</p>
Impact	Negative, Slight, Permanent
Proposed mitigation	Archaeological monitoring
Approx. distance	c. 30m north-west of the Proposed Scheme
Photography	 <p>Mound viewed from the Old Malahide Road, facing north-west</p>

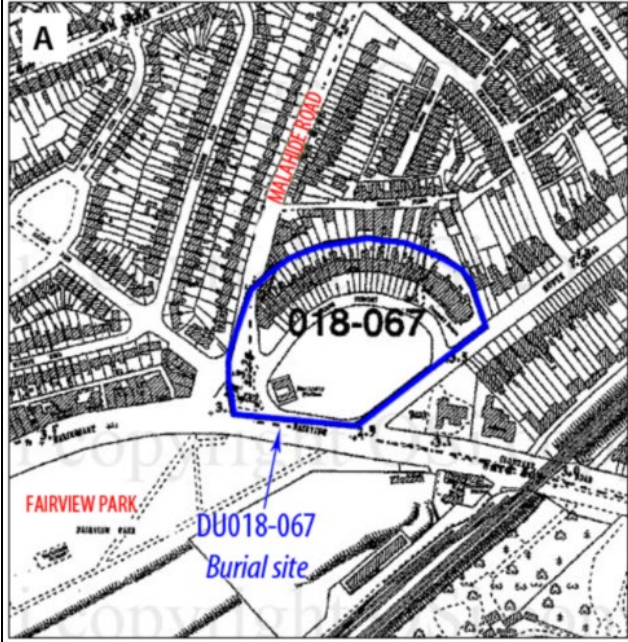

Identification No.	DU015-084
Legal Status	RMP
Townland / Street Address	Coolock Village
Site Type	Chapel
ITM	719697, 739096
Description	Appleyard (1985) mentions a chapel in Coolock village c. 1710 on the site of the former St Brendan's R.C. Church. The green triangular patch at the junction of Oldtown lane with Coolock Lane (where Beechpark Avenue joins Oscar Traynor Road was known as 'The Chapel Bank'. There are no visible remains at ground level.
Sources	Appleyard 1985, NMS 2020
Impact	No impact
Proposed mitigation	None required
Approx. distance	c. 65m north-west of Proposed Scheme
Photography	n/a

Identification No.	DCIHR 15-13-009
Legal Status	None
Townland / Street Address	Malahide Road
Site Type	Bridge
ITM	718560, 737678
Description	<p>According to the Dublin City Industrial Heritage Record (DCIHR) survey, the bulk of this bridge was replaced during widening of the road with only the west elevation appearing to survive (Dublin City Council (DCC) 2003-2009). This comprised a random rubble wall indicating a double-arch bridge with concrete cutwaters and modern metal gates to the arches. The low random rubble parapet wall to west side of roadway is surmounted by modern railings, forming part of the boundary wall to the grounds of Cadbury's factory. Though only a portion this bridge appears to survive, the remaining west elevation is of continued importance within the infrastructural history of the locality. There is every possibility that further fabric from the bridge survives beneath the ground surface on the Old Malahide Road and Malahide Road. The surviving elevation will not be impacted. Ground-breaking works at this location will impact on any remains that survive below ground. The bridge site has a low sensitivity value and the magnitude of impact is medium, resulting in a slight impact.</p>
Sources	Field survey. DCC 2003-2009.
Impact	Negative, Slight, Permanent
Proposed mitigation	Archaeological monitoring
Approx. distance	Within Proposed Scheme
Photography	 <p>Surviving parapet wall within the grounds of Cadbury's (DCIHR 2008)</p>

Identification No.	CBC0001AH001
Legal Status	None
Townland / Street Address	R107 Malahide Road / Newtown Road
Site Type	18 th / 19 th century structures (site of)
ITM	720449, 739873
Description	<p>On the south side of the petrol station at R107 Malahide Road / Newtown Road, a house and outbuildings occupied part of the site from the 19th century onwards. A review of historic mapping indicates that from at least the early 19th century, a stream flowed across the northern green space, crossing beneath the old Malahide Road via Newtown Bridge, while a house is depicted within the southern green space (as evident on the first edition OS six-inch map of 1843, overlaid onto modern aerial imagery). By the time of 25-inch OS map (1907-0), additional buildings are depicted alongside the house, which is named Newtown House on the revised six-inch OS map (1935-38). The bridge, which lies outside of the Proposed Scheme, is noted in the DCIHR (Ref. 15-09-001) as having no above ground trace, while the watercourse appears to be culverted (DCC 2003-2009). The road to the rear of the petrol station is a surviving section of the old Malahide Road, which was bypassed when the road was realigned during construction of the R107 Malahide Road dual-carriageway. Both areas comprise small, landscaped green space, with some tree planting. The presence of a former watercourse through the proposed location on the north side of the petrol station at Malahide Road / Newtown Road may increase the inherent archaeological potential in this area, as riverine environments have attracted human activity from the prehistoric period onwards. However, both of these locations are relatively small, which may limit the significance of any potential impacts on archaeological heritage.</p> <p>Ground-breaking works will impact any foundation remains of 18th / 19th century buildings that survive below ground. There is also a slight potential that ground-breaking works would uncover previously unknown archaeological features or deposits. CBC001AH001 has a low sensitivity value and the magnitude of impact is medium, resulting in a slight impact.</p>
Sources	<p>DCC 2003-2009, OSI 2020</p>  <p>Historic OS Maps Showing the Stream, Newtown Bridge and Newtown House in 1843 (A), 1907-09 (B) and 1935-38 (C) (OSI 2020)</p>
Impact	Negative, Slight, Permanent
Proposed mitigation	Archaeological monitoring
Approx. distance	Within Proposed Scheme
Photography	None

1.2.2 Gracefield Road to Marino Mart / Fairview - Malahide Road

Identification No.	DU018-006
Legal Status	RMP
Townland / Street Address	Malahide Road
Site Type	Bridge
ITM	718567, 737670
Description	Donnycarney Bridge (1896) which spans the Donnycarney river, replaced an ancient stone structure known as Scurloges Bridge. There are no visible remains at ground level. The river is now culverted. The red-brick parapet wall on the west side of the road marks the site and contains the date plaque of the later, 19th century bridge (DCIHR 18-04-010 in Chapter 16 (Architectural Heritage)). Ground-breaking works along the Malahide Road, at the site of the earlier bridge, will impact on any features that may survive below ground. The RMP site has a medium sensitivity value and the magnitude of impact is medium, resulting in a moderate impact.
Sources	<p>Wren 1983, DCC 2003-2009, NMS 2020, OSI 2020, Ferguson 1998.</p> <div style="display: flex; justify-content: space-around;">   </div> <p>Left: Rocque's map of Dublin county (1760) showing the bridge over the Donnycarney river (Ferguson 1998). Right: OS first edition six-inch map (1843), showing Scurloges Bridge. (OSI 2020)</p>  <p>OS revised edition 25-inch map (1906-09), showing site of Scurloges's Bridge, renamed Donnycarney Bridge. (OSI 2020)</p>
Impact	Negative, Moderate, Permanent
Proposed mitigation	Archaeological monitoring
Approx. distance	Within Proposed Scheme
Photography	n/a

Identification No.	DU018-067
Legal Status	RMP
Townland / Street Address	Marino Crescent
Site Type	Burial
ITM	717935, 736417
Description	<p>Human remains were unearthed during the construction of a crescent of Georgian houses c. 1792 (RMP DU018-067). An account of the discovery is provided in a paper in the <i>Dublin Historical Record</i> by Wren (1983):</p> <p><i>'Marino Crescent at the bottom of Malahide Road, with the tall Georgian houses and which has been described as the Bath of Ireland, was built around 1792 by Charles Ffolliot an Aungier Street painting contractor. These houses, it is said, were once known locally as Spite Crescent due to a dispute between Lord Charlemont and Ffolliot, the latter erected these tall buildings to shut out the view of the bay from Marino House. Charlemont in an attempt to prevent Ffolliot from bringing materials to the site, increased the toll charges at the gate under his control, but the wily painter had his building supplies conveyed by barge across the bay. Many human bones were unearthed here when the foundations for the houses were being excavated, perhaps the remains of some of the fallen of the Battle of Clontarf.'</i></p> <p>The exact nature and location of the burial site is unknown. There has been extensive development in this area from the 18th century onwards, however, despite modern disturbances, there is the slight potential that additional human remains may be present in the area around Marino Crescent, within the Proposed Scheme. The proposed works along Malahide Road / Marino Mart within the ZAP for the burial site will not entail excavation below the existing road formation level. There is however the potential that disarticulated bone may be present even within previously disturbed areas. As such ground-breaking works within the ZAP for the burial site may impact on any such remains that may be present below ground. The ZAP for the burial site has a medium sensitivity value and the magnitude of impact is low; therefore, the impact is Negative, Slight, Permanent.</p>
Sources	<p>Wren 1983, NMS 2020</p> <div style="display: flex; justify-content: space-around;">   </div> <p>A. RMP Published Map (Duchas The Heritage Service 1998) Showing Designated Zone of Archaeological Potential for DU018-067, Burial Site; B. Archaeological Survey of Ireland Historic Environment Viewer (NMS 2020), Showing RMP Site Location in Marino Crescent Park</p>
Impact	Negative, Slight, Permanent
Proposed mitigation	Archaeological monitoring
Approx. distance	Proposed Scheme traverses the western edge of the ZAP as depicted on the RMP published map, at the south end of Malahide Road Marino Mart
Photography	n/a

2. Cultural Heritage (CH) Sites

No sites of cultural heritage interest were identified within or in the vicinity of the Proposed Scheme. Historic street furniture and cultural heritage sites of architectural interest are discussed in Chapter 16 (Architectural Heritage).

3. References

Appleyard, D. S. (1985). *Green Fields Gone Forever: The Story of the Coolock and Artane Area*. Coolock Select Vestry.

Dublin City Council (DCC) (2003 to 2009). Dublin City Industrial Heritage Record. Dublin City Council.

Dúchas The Heritage Service (1998). Record of Monuments and Places Manuals and Maps, Archaeological Survey of Ireland. Dúchas The Heritage Service


Ferguson, P. (Ed.) (1998) *The A to Z of Georgian Dublin: John Rocque's Maps of the City in 1756 and the County in 1760*. Lympne Castle.

National Monuments Service (NMS) (2020). Archaeological Survey of Ireland Sites and Monuments Record Database [Online]. Available from <https://webgis.archaeology.ie/historicenvironment/>

Ordnance Survey Ireland (OSI) (2020). Historical maps and aerial imagery [Online]. Available from <http://map.geohive.ie/mapviewer.html>

Stanley, M. (2011). 'Chocolate and community archaeology', in *Archaeology Ireland*, Vol. 25, No. 4 (Winter 2011), pp. 19-23. Wordwell.

Wren, J. (1983). 'From Ballybough to Scurloges Bridge', in *Dublin Historical Record*. Vol. XXXVII, No. 1, pp. 14-29. Old Dublin Society.



Appendix A15.2

Glossary of Impacts and Assessment Methodology

Appendix A15.2: Glossary of Impacts and Assessment Methodology

1. Glossary of Impacts

Potential impacts on the receiving archaeological and cultural heritage environment can be described as direct physical impacts, indirect physical impacts, and impacts on setting (i.e. the surroundings in which an archaeological / cultural heritage asset can be experienced; Historic England 2017).

Direct physical impacts are those development activities that directly cause damage to the fabric of an archaeological / cultural heritage asset. Typically, these activities are related to construction works (e.g. they could include excavation of foundations, earthmoving / site preparation creation of access roads, cycle paths, and the excavation of service trenches).

Indirect physical impacts are those processes, triggered by development activity, that lead to the degradation of archaeological / cultural heritage assets.

Impacts on the setting of archaeological / cultural heritage assets describe how the presence of a development changes the surroundings of an asset in such a way that it affects (positively or negatively) the heritage significance of that asset. Visual impacts are most commonly encountered. Such impacts may be encountered at all stages in the life cycle of a development, but they are only likely to be considered significant during the prolonged operational life of the development.

Types of impact, as defined by the Draft EPA Guidelines on Information to be Contained in Environmental Impact Assessment Reports (hereafter referred to as the EPA Guidelines) (EPA 2017):

- *Cumulative Impact* – The addition of many small impacts to create one larger, more significant, impact.
- *Do Nothing Impact* – The environment as it would be in the future should no development of any kind be carried out.
- *Indeterminable Impact* – When the full consequences of a change in the environment cannot be described.
- *Irreversible Impact* – When the character, distinctiveness, diversity or reproductive capacity of an environment is permanently lost.
- *Residual Impact* – The degree of environmental change that will occur after the proposed mitigation measures have taken impact.
- *‘Worst case’ Impact* – The impacts arising from a development in the case where mitigation measures substantially fail.
- *Indirect or Secondary Impacts* – Impacts that arise off-site or are caused by other parties that are not under the control of the developer. Impacts which are caused by the interaction of impacts, or by associated or off-site projects.

1.1 Quality of Impacts

Impacts on the archaeological and cultural heritage environment are assessed in terms of their quality, i.e. positive, negative, neutral:

- **Negative Impact:** A change that will detract from or permanently remove an archaeological monument / cultural heritage asset from the landscape;
- **Neutral Impact:** A change that does not affect archaeological and cultural heritage heritage; and
- **Positive Impact:** A change that improves or enhances the setting of an archaeological / cultural heritage asset.

1.2 Duration of Impacts

The duration of an impact can be as follows:

- **Temporary Impact:** Impact lasting for one year or less;
- **Short-term Impact:** Impact lasting one to seven years;

- Medium-term Impact: Impact lasting seven to fifteen years;
- Long-term Impact: Impact lasting fifteen to sixty years; and
- Permanent Impact: Impact lasting over sixty years.

2. Assessment of Impacts

2.1 Introduction

This assessment methodology has regard to the EPA assessment criteria (EPA 2017) and to the National Roads Authority (NRA) Guidelines for the Assessment of Archaeological Heritage Impact of National Road Schemes (hereafter referred to as the NRA Guidelines) (NRA 2005).

Archaeological and cultural heritage sites are a non-renewable resource and such assets are generally considered to be location sensitive. In this context, any change to their environment, such as construction activity and ground disturbance works, could adversely affect these sites.

2.2 Significance / Sensitivity Criteria

In accordance with EPA Guidelines (EPA 2017), the context, character, significance and sensitivity of each archaeological / cultural heritage asset requires evaluation and the significance of the impact is then determined by considering the significance / sensitivity of the asset and the potential magnitude of the impact.

In accordance with the NRA Guidelines (NRA 2005), the significance criteria used to evaluate an archaeological site, monument or complex take into account the character and integrity of the asset and any available data regarding it. This can be ascertained by looking at the following criteria cited in the NRA Guidelines (NRA 2005): the existing status (level of protection), condition or preservation, documentation or historical significance, group value, rarity, visibility in the landscape, fragility or vulnerability, and amenity value (Table 1). While these criteria contribute to the significance of a feature they should not be treated as definitive. These criteria are indicators which contribute to a wider judgement based on the individual circumstances of these archaeological/cultural heritage assets.

Table 1: Explanation of Archaeology and Cultural Heritage Asset Assessment Criteria

Criteria	Explanation
Existing Status	The level of protection associated with an archaeological / cultural heritage asset is an important consideration.
Condition / Preservation / Integrity	The survival of an archaeological / cultural heritage asset's archaeological potential both above and below ground is an important consideration and should be assessed in relation to its present condition and surviving features. Well-preserved sites should be highlighted, this assessment can only be based on a field inspection.
Documentation / Data	The significance of a an archaeological / cultural heritage asset may be enhanced by the existence of records of previous investigations or contemporary documentation supported by written evidence or historic maps. Sites with a definite historical association or an example of a notable event or person should be highlighted.
Group Value / Character	The value of a single an archaeological / cultural heritage asset may be greatly enhanced by its association with related contemporary monuments or with monuments from different periods indicating an extended time presence in any specific area. In some cases, it may be preferable to protect the complete group, including associated and adjacent land, rather than to protect isolated monuments within that group.
Rarity / Character	The rarity of some an archaeological / cultural heritage asset types can be a central factor affecting response strategies for development, whatever the condition of the individual feature. It is important to recognise sites that have a limited distribution.
Visibility in the landscape/ Character / Integrity	Archaeological / cultural heritage assets that are highly visible in the landscape have a heightened physical presence. The inter-visibility between monuments may also be explored in this category.
Fragility / Vulnerability / Integrity	It is important to assess the level of threat to an archaeological / cultural heritage asset from erosion, natural degradation, agricultural activity, land clearance, neglect, careless treatment or development.
Amenity Value / Character	Regard should be taken of the existing and potential amenity value of a an archaeological / cultural heritage asset.

An evaluation of the significance / sensitivity of archaeological / cultural heritage assets is based on their designation and on the extent to which these assets contribute to the archaeological or cultural heritage environment, though their individual or group qualities, either directly or potentially. Table 2 presents the scale of significance / sensitivity together with criteria. It has been compiled by Courtney Deery Heritage Consultancy Ltd, based on standard authorities and guidelines as listed in Section 3. Undesignated archaeological or cultural heritage sites can be assigned a low, medium or high sensitivity value, taking into consideration the criteria cited

in Table 1 (e.g. condition, character, integrity or preservation, data, group value, rarity, visibility in the landscape, fragility or vulnerability, and amenity value).

Table 2: Significance / Sensitivity Criteria

Sensitivity / Significance	Criteria
High	Sites of international significance: World Heritage Sites. National Monuments. Protected Structures (assessed by the NIAH to be of international and national importance), where these are also National Monuments. Undesignated archaeological and cultural heritage sites.
Medium	Recorded Monuments (RMP sites & SMR sites scheduled for inclusion in the next revision of the RMP) Protected Structures / NIAH sites (assessed by the NIAH to be of regional importance), where these are also Recorded Monuments. Newly identified archaeological sites, confirmed through archaeological investigation, to be added to the SMR. Undesignated archaeological and cultural heritage sites.
Low	Sites listed in the Dublin City Industrial Heritage Record (DCIHR) and National Inventory of Architectural Heritage (NIAH) Building for which there are no upstanding remains. Undisturbed greenfield areas and riverine environs, which have an inherent archaeological potential. Undesignated archaeological and cultural heritage sites.
Negligible	Assets with very little or no surviving archaeological and / or cultural heritage interest.

2.2.1 World Heritage Sites

The historic city of Dublin* is on the United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage Tentative List, which is an inventory of properties that each State Party intends to consider for nomination. The Georgian city plan under consideration still survives largely intact and is bounded to the north and south by the canals, to the west by the Phoenix Park, and to the east by the sea (Permanent Delegation of Ireland to the OECD and UNESCO 2010).

The city is considered under the headings of authenticity, integrity and justification of its outstanding universal value. The significance of the streetscape and buildings is attributed to the development of Dublin after the Restoration in the 1660s, when the city became the second imperial capital, after London, of the British Empire, with major development and expansion in the Georgian period (1714 to 1830). This has given Dublin the institutional buildings, terraces and infrastructure, and set out the city plan as it substantially survives today. The city has made an extraordinary contribution to world literature. The city influenced and provided the setting for many writers including Swift, Sheridan, Goldsmith, Burke, and Moore in the 18th and early 19th centuries; Wilde and Stoker in the later 19th century; the Irish Literary Revival of the early 20th centuries, with Yeats, Gregory and the Abbey Theatre, Synge, O'Casey, and Joyce; continuing with Shaw, Beckett, and Flann O'Brien to the present. Three of the four Irish Nobel laureates for Literature were from Dublin: Yeats in 1923, Shaw in 1925, and Beckett in 1969. The intangible cultural heritage of the historic city of Dublin relates to this contribution to world literature.

*As distinct from the RMP designated Historic City of Dublin discussed in Section 2.2.4.

2.2.2 National Monument

The National Monuments Act (1930, Section 2) defines a 'National Monument' as

'a monument or the remains of a monument the preservation of which is a matter of national importance by reason of the historical, architectural, traditional, artistic or archaeological interest attaching thereto'.

The National Monuments legislation legally protects access to and the visual amenity associated with National Monuments and requires consent from the Minister for invasive works in their vicinity.

The defences / town walls of medieval Dublin are a National Monument in accordance with national policy on town defences (Department of Environment, Heritage and Local Government 2008).

2.2.3 Recorded Monuments

The primary source of information for archaeology is the Record of Monuments and Places (RMP) maintained by the Department of Housing, Local Government and Heritage (DHLGH). The RMP documents known upstanding archaeological monuments, their original location (in cases of destroyed monuments) and the position of possible sites in rural areas identified as cropmarks on vertical aerial photographs dating to before 1700 AD (with some later ones also being included). It is based on a comprehensive range of published and publicly available documentary and cartographic sources.

For the purpose of the assessment, the Sites and Monument Record (SMR) data and mapping as updated by the Archaeological Survey of Ireland (www.archaeology.ie) was examined so it could be used within an interactive identification and mapping system developed for Proposed Project.

2.2.4 Zones of Archaeological Potential

Zones of archaeological potential (ZAP) can be defined as areas within the urban and rural landscape that possess the potential to contain archaeological remains due to the settlement history of a place and or to the presence of topographical features such as rivers, lakes and high, defensible ground. An example of this is the RMP designated Historic City of Dublin, which is designated as a zone of archaeological potential covering an extensive area (RMP DU018-020). Other examples within the study area for the Proposed Project include historic settlements recorded at Donnybrook, Bray, Finglas, Kilmainham, Chapelizod and Tallaght. For the purpose of the assessment, ZAPs with statutory protection (i.e. contained in the RMP) were considered.

2.2.5 Non-Designated Sites

Newly identified archaeological sites that have been confirmed through archaeological investigation (monitoring, testing, excavation, geophysical survey) are considered to be of medium importance. Such sites are undesignated as they have yet to be added to the SMR.

Potential or undesignated archaeological sites identified through aerial photography, historic mapping, stray finds are considered to be of low sensitivity, as they have yet to be ground-truthed through archaeological investigation. Similarly, undisturbed greenfield areas and riverine environs, which have an inherent but as yet unproven archaeological potential are considered to be of low sensitivity.

The DCIHR provided by Dublin City Council (DCC) is based on a paper survey only and where there are no upstanding remains of the industrial heritage sites, the survival of below-ground sites cannot be confirmed; as such the sensitivity is considered to be low.

2.3 Magnitude of Impact

When assessing the impact magnitude, the following criteria need to be considered:

- Extent – size, scale and spatial distributions of the impact;
- Duration – period of time over which the impact will occur;
- Frequency – how often the impact will occur; and
- Context – how will the extent, duration and frequency contrast with the accepted baseline conditions (see Table 1).

Table 3: Magnitude of Impact Criteria

Impact Magnitude	Criteria
High	These impacts arise where an archaeological / cultural heritage asset is completely and irreversibly destroyed by a proposed development. A change such that the value of the asset is totally altered or destroyed, leading to a complete loss of character, integrity and data about the site.
Medium	An impact which, by its magnitude, duration or intensity alters an important / significant aspect of the environment. An impact like this would be where an archaeological / cultural heritage asset would be impacted upon leading to a significant loss of character, integrity and data about the site.

Impact Magnitude	Criteria
	<p>Or an impact which by its magnitude results in the partial loss of a historic structure (including fabric loss or alteration) or grounds including the part removal of buildings or features or part removal of demesne land (e.g. severance, visual intrusion or degradation of setting and amenity).</p> <p>A permanent positive impact that enhances or restores the character and / or setting of a cultural heritage site or upstanding archaeological heritage site in a clearly noticeable manner.</p>
Low	<p>A low impact arises where a change to the site is proposed which though noticeable is not such that the archaeological / cultural heritage character / integrity of the site is significantly compromised, and where there is no significant loss of data about the site.</p> <p>A positive impact that results in partial enhancement of the character and / or setting of a cultural heritage site or upstanding archaeological heritage site in the medium to long-term.</p>
Negligible	<p>An impact which causes very minor changes in the character of the environment and does not directly impact an archaeological / cultural heritage asset, or affect the appreciation or significance of the asset. There would be very minor changes to the character and integrity of the asset and no loss of data about the site.</p>

2.4 Significance of Impact

The Draft EPA Revised Guidelines on the Information to be Contained in Environmental Impact Statements (EIS) (EPA 2015) added the two additional levels of significance of impact: Very Significant and Not Significant (Table 4 and Image 1).

Table 4: Significance of Impacts (EPA 2015)

Significance of Impact	Description
Very Significant	An impact which by its character, magnitude, duration or intensity significantly alters the majority of a sensitive aspect of the environment, for example in this case a monument
Not Significant	An impact which causes noticeable changes in the character of the environment but without noticeable consequences.

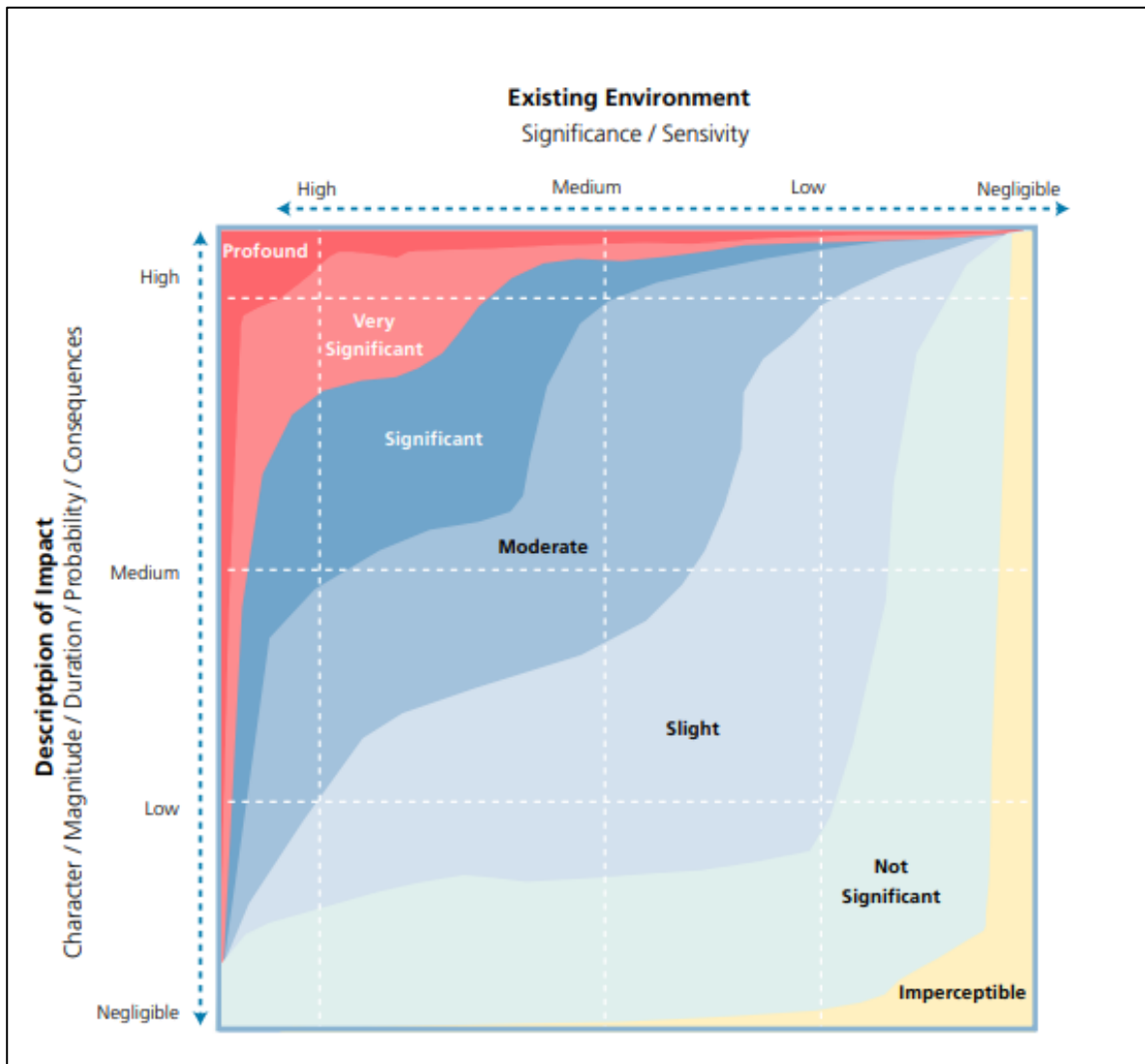


Image 1: Figure 3.5 Description of Impacts from the Draft EPA Revised Guidelines on Information to be Contained in EIS (EPA 2015)

The likely significance of impacts is determined by considering the baseline rating or sensitivity value of the asset upon which the impact has an impact and the magnitude of the impact (Image 1). The impact significance is defined as Imperceptible, Not Significant, Slight, Moderate, Significant, Very Significant, or Profound (Table 5).

Table 5: Defining Significance of Impacts

Impact	Definition
Imperceptible	An impact capable of measurement but without noticeable consequences.
Not Significant	An impact which causes noticeable changes in the character of the environment but without significant consequences.
Slight	An impact which causes minor changes in the character of the environment and does not affect an archaeological / cultural heritage asset in a moderate or significant manner.
Moderate	A moderate impact arises where a change to the site is proposed which though noticeable, does not lead to a significant loss of character, integrity and data about the archaeological / cultural heritage asset.
Significant	An impact which, by its magnitude, duration or intensity, alters an important aspect of the environment. An impact like this would be where part or all of a site would be permanently impacted upon, leading to a significant loss of character, integrity and data about the archaeological / cultural heritage asset.
Very Significant	An impact which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.

Impact	Definition
Profound	Applies where mitigation would be unlikely to remove adverse impacts. Reserved for adverse, negative impacts only. These impacts arise where an archaeological / cultural heritage asset is completely and irreversibly destroyed by a proposed development.

3. References

Dublin City Council (DCC) (2003 to 2009). Dublin City Industrial Heritage Record. Dublin City Council.

DCC (2016). Dublin City Development Plan (2016-2022). Dublin City Council.

EPA (2015). Revised Guidelines on the information to be contained in Environmental Impact Statements, Draft September 2015.

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Appendix A15.3

City and County Development Plan, Relevant Policies and Objectives

Appendix A15.3: City and County Development Plan, Relevant Policies and Objectives

1. Dublin City Development Plan 2016-2022

It is the policy of Dublin City Council

CHC9: To protect and preserve National Monuments.

1. To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of the re-use of buildings, light buildings, foundation design or the omission of basements in the Zones of Archaeological Interest.
2. That where preservation in situ is not feasible, sites of archaeological interest shall be subject to 'preservation by record' according to best practice in advance of redevelopment.
3. That sites within Zones of Archaeological Interest will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.
4. That the National Monuments Service will be consulted in assessing proposals for development which relate to Monuments and Zones of Archaeological Interest.
5. To preserve known burial grounds and disused historic graveyards, where appropriate, to ensure that human remain are re-interred, except where otherwise agreed with the National Museum of Ireland.
6. That in evaluating proposals for development in the vicinity of the surviving sections of the city wall that due recognition be given to their national significance and their special character.
7. To have regard to the Shipwreck inventory maintained by the DAHG. Proposed developments that may have potential to impact on riverine, inter-tidal and subtidal environments shall be subject to an underwater archaeological assessment in advance of works.
8. To have regard to DAHG policy documents and guidelines relating to archaeology.

It is the policy of Dublin City Council:

CHC10: To continue to preserve and enhance the surviving sections of the City Wall and city defences – a National Monument, according to the recommendations of the City Walls Conservation Plan 2015 – with reference to the National Policy on Town Defences, adopted by the Department of the Environment in 2008.

CHC11: To preserve historic place and street names and ensure that new street names should reflect appropriate local historical or cultural associations.

CHC13: To support and pursue a World Heritage nomination for the Historic City of Dublin, in partnership with the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs and other stakeholders.

CHC14: To promote the awareness of Dublin's industrial, military and maritime, canal-side (including lock-keepers' dwellings) and rural (vernacular) heritage.

CHC15: To preserve, repair and retain in situ, historic elements of significance in the public realm including railings, milestones, city ward stones, street furniture, ironmongery, and any historic kerbing and setts identified in Appendices 7 and 8 of the development plan, and promote high standards for design, materials and workmanship in public realm improvements. Works involving such elements shall be carried out in accordance with the Department of Arts Heritage and the Gaeltacht Advice Series: Paving, the Conservation of Historic Ground Surfaces.

CHC18: To support and promote a strategy for the protection and restoration of the industrial heritage of the city's waterways, such as the River Dodder, including retaining walls, weirs and millraces.

It is an objective of Dublin City Council:

CHCO10: 14. To implement and promote The Dublin Principles (ICOMOS, 2011) as guiding principles to assist in the documentation, protection, conservation and appreciation of industrial heritage as part of the heritage of Dublin and Ireland.

The development of the city is shown on Figure 17 (Dublin City: Historic Core) of the Dublin City Council (DCC) Development Plan (2016 - 2022) (DCC 2016) (Image 1). This figure also displays key urban landmarks, including city parks such as St Stephen's Green (National Monument), the Phoenix Park, Merrion Square and the Iveagh Gardens.

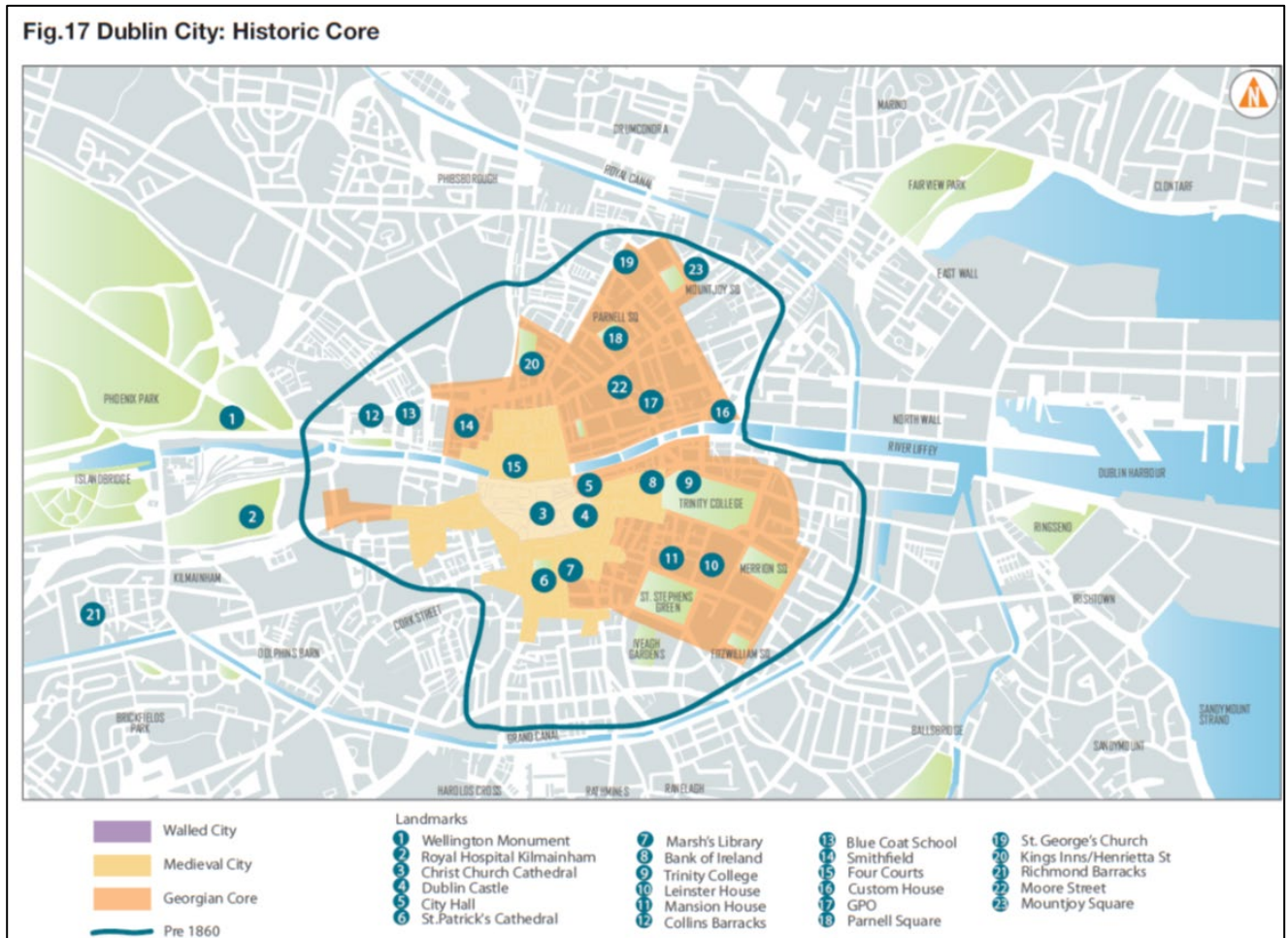


Image 1: Figure 17 of the DCC Development Plan (DCC 2016), showing Dublin City: Historic Core