



## DRAFT FINGAL CO CO 2023 – 2029 DEVELOPMENT PLAN

### BACKGROUND

DAFM has been asked to comment on the draft FCC 2023 – 2029 county development plan. This plan is revised and reviewed every 5 years and forms the basis and framework for strategic development and growth in a council area for a defined period.

The proposal is for the upcoming FCC plan to be in place in 2023 and run to 2029

### FISHERY HARBOURS

Howth FHC is located entirely within FCC and is positioned on the north side of the Howth peninsula in North County Dublin. It is the largest FHC on the East coast and serves both the fishing and marine commercial industry as well as the marine leisure. Howth also represents a large tourist draw, located as it is close to the airport, bus, rail and road connections and in close proximity to the city of Dublin. The tourist footfall for Howth is in the region of 700,000 persons per annum, and as such there is a large overlap in interest in the safe access to and operation of the harbour in the context of local development and future developments and operations in the FHC.

### COMMENTS

The overall thrust of the plan is welcomed, in particular the inclusion of “healthy place making”, “enhanced co-ordination” “universal access design approaches” promotion of the circular economy in construction and “coastal management” as core tenets of part of the scheme.

Of particular interest to MED is that the “enhanced co-ordination” be followed through by FCC. It is crucial that DAFM & in particular the Marine Engineering Division (MED) & Sea Fisheries Administration Division (SFAD) be included in stakeholder co-ordination meetings and spatial planning for the Howth/Baldoyle FCC area. As a major marine industrial hub, employment source, and tourist draw, DAFM are very much relevant in the following sample objectives, while not exhaustive, below are a sample of the objectives that DAFM would see as key to quality future management and development of a safe vibrant and sustainable harbour.



# MED East Comments

## Objective SPQHO16

Prepare Framework Plans where outlined in Chapter 2, liaising closely with landowners, developers Elected Members and other relevant stakeholders (which may include local community and voluntary organisations (e.g. Residents' Associations and Tidy Towns groups). These documents shall indicate the broad development parameters for each site and take cognisance of permitted developments and any potential environmental impacts.

Request: that DAFM MED/SFAD be included in the above discussions and stakeholder meetings and workshops

## Policy CAP24 – Circular Economy

Support the shift towards the circular economy approach as set out in the National Waste Policy for 2020–2025.

## Policy CAP25 – Waste Management Plans for Construction and Demolition Projects

Have regard to existing Best Practice Guidance on Waste Management Plans for Construction and Demolition Projects as well as any future updates to these Guidelines in order to ensure the consistent application of planning requirements.

DAFM welcomes the above policies and they align with our own processes and approaches to the development of, and works in the harbour. DAFM have notably used the dredge and new liquid stabilisation methodology of dredge material to reduce the amount of import and virgin material used on the Middle Pier project.

## Policy CAP30 – Coastal Monitoring

Monitor coastal erosion and accretion along Fingal's coastline to identify locations at risk of coastal erosion and flooding.

## Policy CAP31 – Coastal Protection

Ensure the provision of appropriate coastal protection measures in locations at risk of coastal erosion and flooding.

## Policy CAP32 – Coastal Zone Management

Support coastal zone management measures for adapting to climate change which include restoration of degraded ecosystems, increased flood resilience, water quality improvement, habitat conservation and provision of amenities for the residents of and visitors to Fingal.

## Policy CAP33 – Engagement with Key Stakeholders

Continue to work with national and regional authorities and other key stakeholders with regard to flood defence required to protect vulnerable urban areas from worst case scenario sea level rises in the coming decades.

While Coastal protection and monitoring within the FHC are a matter for the department, there are areas at the interface between FCC and DAFM lands to ensure that a holistic approach to the protection of public and heritage structures and prevention of worsening of coastal structures and their environs is effectively carried out.



# MED East Comments

## Policy CMP25 – Car Parking Management

Implement a balanced approach to the provision of car parking with the aim of using parking as a demand management measure to promote a transition towards more sustainable forms of transportation, while meeting the needs of businesses and communities.

## Objective CMO30 – Car Parking Standards

Implement appropriate car parking standards for a range of land-use types, where provision is based on factors such as site location, level of public transport accessibility and impact of parking provision on local amenity.

## Objective CMO31 – Accessible Car Parking

Promote appropriate parking arrangements for specific user requirements in town and district centres, public transport nodes and other destinations.

Parking in Howth FHC has long been the parking "reservoir" for visitors to the Howth Peninsula, with circa 450 marked parking spaces available. Due to the nature of the FHC, and its usage, DAFM must accommodate and manage a wide range of parking offerings, for instance while the overall thrust per CMP25 is to reduce or manage parking in order to push casual users towards public transport, this may not be possible in the context of the FHC. This is as a result of the need to accommodate a different type of user, where you could have fishers going to sea for a period of days or weeks, to facilitate delivery and maintenance vehicles, to facilitate events or operational requirements such as trailer parking for vessels launched and retrieved from the public slipways and quays. As such the parking offering from DAFM is significantly different in nature to a regular town centre and care will need to be taken by FCC in their planning reviews with respect to the objectives above to account for the different type of usage that the FHC generates.

## Objective EEO38 – Marine Sector

Support the existing diverse nature of the marine sector in Fingal, and identify and promote sustainable growth opportunities, while protecting European sites. This shall be achieved through engagement and partnership with the relevant agencies, sectoral representatives and local communities.

## Objective EEO39

Ensure that proposals for economic development associated with the marine sector are cognisant of the sensitivities of many of Fingal's coastal locations and that relevant environmental issues are appropriately considered.

## Objective EEO40

Undertake a feasibility study of the Fingal coastline to identify potential sites to accommodate marina development relevant to recreational pursuits and requirements. As part of the study the impact on the receiving marine environment, including the coastline, will be assessed and Screening for Appropriate Assessment and SEA undertaken.



# MED East Comments

On marine and coastal development to work with DAFM to help align goals where possible and to have productive knowledge transfer in both directions where possible, and to liaise and engage with DAFM in the particular context of the Local Authority Piers funding programme that FCC has availed of in the past.

Howth FHC has been in situ since the early 1800s and has seen many upgrades and developments over the years, it is crucial that this continuous maintenance and improvements of facilities are continued in a collegial and cooperative fashion, the key to this kind of long term strategy remains clear open communications and we encourage that FCC consider DAFM a key stakeholder in the Howth Baldoyle area and include DAFM in the plans, discussions and meetings that are offered to other local stakeholders into the future.

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Date: 26/04/2022

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