



Harbourmaster's Office
West Pier,
Howth,
Co. Dublin D13 A3Y0

By email: howthengineering@agriculture.gov.ie

9th April 2021



Observations on Howth Harbour Dredging and infill project

Dear Harbourmaster and Department of Agriculture, Food and the Marine,

Please find my observations below in response to the public consultation.

General

The siltation within the harbour is severe and the need for dredging is clear. The dredged material is contaminated and therefore not suited for dumping at sea. Fingal identified the area behind the West Pier as a potential infill location some time ago. Subject to the implementation of the necessary environmental protection measures this infill proposal is likely to be the best option.

In this sensitive location, such a major intervention brings both risks and opportunities.

Protect sea and land from contamination.

It is vital that the dredged material is safely encased to prevent the movement of contaminants into the marine environment both during construction and subsequently. The Environmental Impact Assessment must address this protection in detail so that the proposals can be fully examined by the public and by relevant authorities including EPA and NPWS.

Maximise biodiversity benefits

Artificial structures in the coastal environment such as this proposed infill should be designed in line with an eco-engineering approach, with objectives including maximising biodiversity and ecosystem services. For an overview of design options please see the attached article and supplementary material.¹

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¹ O'Shaughnessy, K.A., Hawkins, S.J., Evans, A.J. *et al.* Design catalogue for eco-engineering of coastal artificial structures: a multifunctional approach for stakeholders and end-users. *Urban Ecosyst* **23**, 431–443 (2020). <https://doi.org/10.1007/s11252-019-00924-z>

This should include consideration of the potential for the provision of locations where reef ecosystems could develop, taking into account the conservation objectives for the nearby Rockabill to Dalkey Island SAC which include increasing the area and the distribution of reefs.²

Similarly, the elements of the proposal above the high water line should also be designed with a view to protecting and maximising coastal biodiversity.

Provide for swimming, kayaking, windsurfing and other watersports

Howth is a busy location for swimming and other watersports with large numbers visiting to access the water in Howth especially in the summer. Claremont and Burrow Beaches are very shallow, so suited to some forms of bathing but not others. Balcadden Beach is busy with people swimming. The provision of a coastal pool as part of the infill would be a very welcome additional amenity and this proposal provides an excellent opportunity to include such an amenity in the design.

Provide space for enjoying the evening sun and the sunset

The views west over Baldoyle Estuary from the location of the infill are particularly fine in the evenings and this amenity area will undoubtedly be a place of public resort on summer evenings. The design should facilitate cafes and dining areas both indoors and outdoors to take advantage of the views as well as open public space with built-in seating areas and benches for open non-commercial use.

Do not provide extra space for car parking

The harbour area already has extensive areas of car parking, more than enough for everyday demand. The only time when parking is scarce is when large numbers of visitors come (typically summer weekends) and the problem of road congestion at those times is a much greater inconvenience than the scarcity of car parking spaces. Providing extra spaces for the peak demand only risks worsening the problem of traffic congestion.

Provide for secure bicycle parking

Large numbers of visitors come by bicycle and it would be of great benefit to have secure bicycle parking at this location.

Design in harmony with the existing Harbour

The distinctive features of the existing West and East Piers include the local sandstone they are built of and the cut granite finishes. Without necessarily replicating either material, it would be important to design and finish the new amenity area in keeping with the existing Harbour.

Thank you for considering the above.

Best regards,

David Healy

² NPWS, 2013, Rockabill to Dalkey Island SAC (site code: 3000) Conservation objectives supporting document - Marine Habitats and Species
https://www.npws.ie/sites/default/files/publications/pdf/003000_Rockabill%20to%20Dalkey%20Island%20SAC%20Marine%20Supporting%20Doc_V1.pdf