

CUNNANE STRATTON REYNOLDS

CSR Ref: EMP/96601

Senior Executive Officer,
Forward Planning Section,
Land Use Planning & Transportation Department,
County Hall,
Tallaght,
Dublin 24

15th September 2021

LODGEMENT THROUGH THE CONSULTATION PORTAL

Dear Sir/Madam,

Submission on the Draft South Dublin Development Plan 2022-2028 in respect of Brittas Village, South County Dublin

Cunnane Stratton Reynolds (CSR), 3 Molesworth Place, Dublin 2 has been appointed by Finnstown Castle Hotel, Newcastle Road, Finnstown, Lucan, Co Dublin to make a submission on the above.

1.0 Introduction

In accordance with Section 9, 10, 11 and 12 of the Planning and Development Act 2000 (as amended), Cunnane Stratton Reynolds make this submission on the Draft South Dublin County Development Plan on behalf of our client Finnstown Castle Hotel Ltd.

This submission is made in response to South Dublin County Council's invitation to make submissions and observations in respect of the draft plan and is being made within the timeframe for submissions (15th September 2021).

This submission is made in the context of our client being a significant landowner in Brittas Village and in the context of owning a significant amount of land with direct access to Brittas Lakes which are acknowledged as a sensitive location and a significant environmental, leisure and tourism asset within the county.

2.0 About Our Client and Background

Our client has land holdings in or close to Brittas village and has liaised with other interested parties and with other land owners in Brittas with a view to developing a range of amenities and facilities in the village.

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Our client owns the Finnstown Castle Hotel which is a large period house hotel set in some 35 acres. That hotel represents the only period hotel found in its own substantial grounds and that caters predominantly for the active tourist market within South Dublin County. They are also aware that most of the hotels in the county do not offer facilities that encourage the active or experience seeking tourist to stay in the county. The average stay in hotels in South Dublin County is 2 nights and is primarily business tourism or the leisure tourist who wishes to access Dublin city centre. They see the potential under careful circumstances where the tourist offering in the county through the sensitive and sustainable development of Brittas including the area around the lake and within the village could be substantially improved. With acknowledgement to the significant tourism development delivered by the County Council in the last few years, it is our client's view that the active tourism or experienced based sector is comparatively undeveloped in South County Dublin and that the environmentally sensitive and sustainable positive exploitation of Brittas lakes could address this. There is also significant demand for ecotourism and the dry lake in Brittas provides a unique opportunity for that to complement the activities potentially available on the water adjacent.

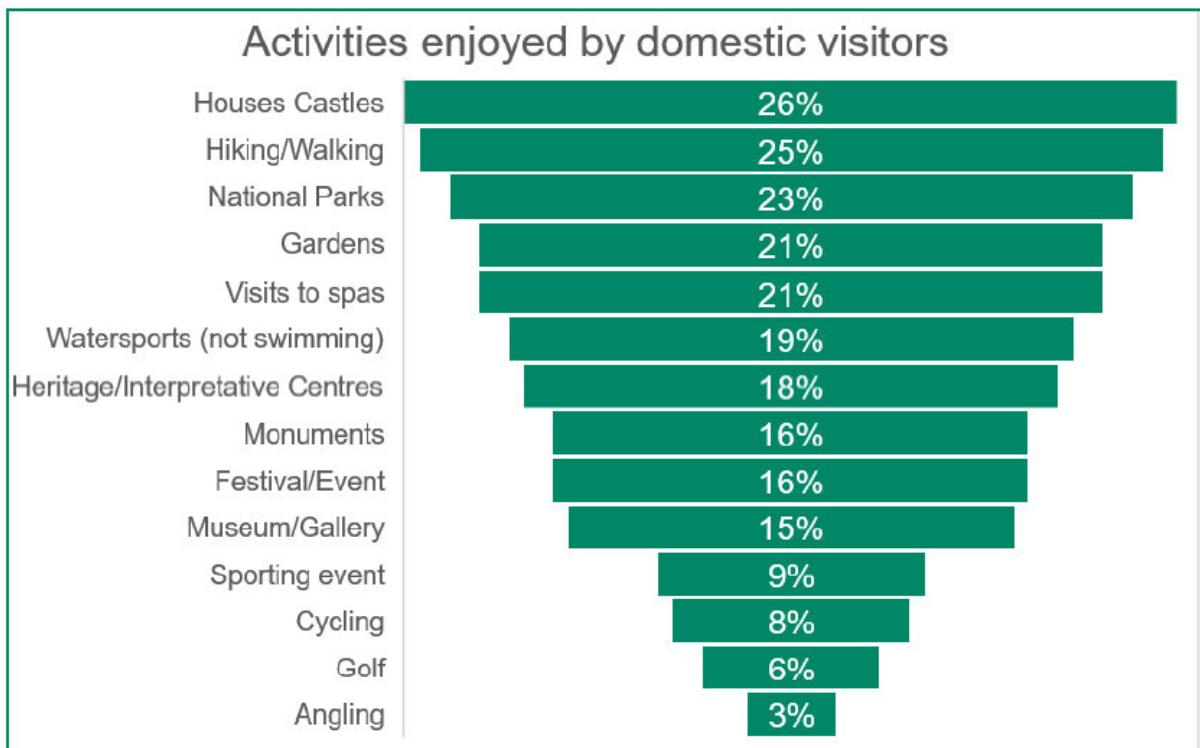
Our client has decades of experience in the hospitality and tourism sector and is extremely familiar with the tourism offering within the county and is acutely aware of the tourism potential of the county that is as yet largely untapped. The intention behind this submission is to ensure that there is a strong planning policy basis to developing the active tourism or experienced based product and activities in the county for both the tourist and the residents of South Dublin.

Tourism Activity

Tourism provides jobs in both rural and urban areas and the sector is dominated by many Irish owned small to medium sized enterprises (SMEs). Tourism also offers wider benefits for local residents, as it can lead to infrastructure improvement, opportunities for 'quality of life' improvements for permanent residents and increasing the attractiveness of an area/county for inward investment. Developing a strategy for retail and tourism/ leisure, is one of the key broad functions and core elements which the emerging Development Plan aims to support in relation to economic development.

The living-with-Covid emphasis on the outdoors dovetails with Fáilte Ireland's pillar of the Irish tourism brand of "Getting Active in Nature", energising the experience and activities in the outdoors. In terms of activities enjoyed by domestic visitors, Fáilte Ireland's Domestic Omnibus tracks the proportion of each activity undertaken by domestic visitors to areas, noting the relative popularity of hiking/walking, spas, water sports and heritage/interpretative centres. A summary of the popularity of various tourism based activities is set out below in Figure 1.

Figure 1:



Source: *Fáilte Ireland Domestic Omnibus, 2017*

In terms of Active Tourism, Fáilte Ireland surveyed this market segment (a representative sample of 15,000 overseas and domestic tourists) in 2013. It concluded that overseas visitors engaging in active tourism contributed an estimated €773 million to the economy in 2012, while identifying the future potential that lies in this growing visitor segment. The active tourism sector is considered a high-yield market segment, with the activity-visitor spending 40 per cent more per day than the non-active visitor (<https://www.failteireland.ie/Footer/Media-Centre/What-do-those-seeking-adventure-really-want.aspx>). This could be associated with higher incomes of this market segment, and/or the 'greening of travel', where they are willing to pay for more sustainable tourism, including being physically active while on holiday (A study by Fernandez and Sanchez (2016) in 'Sustainability' identified the concept of tourists with "sustainable intelligence" who are willing to pay more to visit a sustainable tourism destination. See <https://bit.ly/3myUUNI>).

A visitor engaging in active tourism tended to stay in Ireland for almost nine days – longer than the average visitor who stays on 7 days. Hiking, cycling and water-based activities were some of the most popular pursuits engaged in while in Ireland. Of the activities named above, it was found that walking/hiking offers the highest potential of any activity for Ireland for both domestic and overseas markets. The potential for water-based activity is undoubtedly there in South Dublin and water-based activity will complement the potential for hiking and cycling in the county (note the reference below to the Slade Valley Trail).

In 2011, over 740,000 overseas visitors stated they went hiking in Ireland, spending approximately €649million. In 2018, the number of overseas visitors engaging in walking grew to 2.7 million – highlighting the growth in this active tourist area. For both overseas and domestic markets, interest in walking and hiking activities is much stronger than for other activities, making it a core activity in Active Tourism. Linkages between various activities are also important as part of the overall holiday experience and walking is an activity that is often undertaken in conjunction with cycling. We would add water-based activity to that range of active past-times.

Tourism Development and Innovation: A Strategy for Investment 2016-2022

This strategy produced by Fáilte Ireland and the Department of Rural and Community Development identifies that '*a flourishing tourism industry is vital for Ireland's economic wellbeing and recovery. It also shapes our image and attractiveness as a great place to live, work and invest. While Ireland has a global reputation as a top tourist destination, it's time to be more ambitious and tap into the huge potential that exists in the sector.*'

Section 3.3 promotes opportunities for outdoor activity businesses: the growth of a skilled and knowledgeable cluster of outdoor activity businesses is one way to provide for those visitors who prefer to be active consumers of the natural landscape. Through this investment strategy, Fáilte Ireland will support projects which provide fixed or shared infrastructure which facilitates/encourages/creates opportunities for the business of outdoor adventure providers (this may include water access points, surfboard/canoe lockups, shower blocks, jetties etc.).

Other National Policies

Development envisaged in Brittas by our client will assist in the promotion of healthy lifestyles as advocated in the *Department of Health Statement of Strategy 2016-2019*. That anticipated development is also consistent with the *National Physical Activity Plan for Ireland*. That Plan supports the provision of an environment for walking, cycling and recreational outdoor physical activity. This intention and that of other landowners also complements existing government policy such as *Smarter Travel: A Sustainable Transport Future*; the *National Cycle Policy Framework* and the *National Strategy on Education for Sustainable Development*. Action 36 of the *National Physical Activity Plan* prioritises the development of walking and cycling and general recreational/physical activity infrastructure generally. All local authorities are partners in this initiative. Action 37 seeks to explore opportunities to maximise physical activity and recreation amenities in the natural environment which is very relevant to this case in our opinion. The Irish Trail Strategy adopted by Sport Ireland indicates in Section 4.2.2 that only 14% of recorded trails nationwide are located in the Greater Dublin area (counties Dublin, Wicklow, Meath and Kildare). Section 5.3.6 confirms a shortage of trails in the Greater Dublin area. The proposed development is therefore supported by these non-planning statutory provider strategies. Trails in this location can be made substantially more attractive with access to the lakes.

Grow Dublin Task Force Report (2014)

The 'Grow Dublin Task Force' sought to revitalise the tourism industry in Dublin. The Grow Dublin Task Force Report of January 2014 was endorsed and launched by the Minister for Transport, Tourism and Sport and is established as national tourism policy. It identified that Dublin has slipped behind its main city competitors in Europe in terms of tourism.

Tourism Strategy for South Dublin County 2015-2020

As a direct response to the promotion of Dublin Mountains as an under-utilized tourism asset in the 2014 Task Force Report, the County Council launched their own Tourism Strategy for South Dublin County 2015-2020.

This strategy identifies that South Dublin County possesses the natural and cultural assets to establish and sustain a substantial tourism sector. Located on Dublin's doorstep, the County can reinforce its business tourism strength, and create a range of recreational and leisure attractions and activities, all within a short journey time from the centre of Dublin.

Brittas is referenced in regard to the Slade Valley Corridor and Heritage Trail and the village is a key component of that proposal. The key benefits include:

- Re-establish the links between the three village communities of Saggart, Rathcoole, and Brittas and the promotion of their shared cultural and historic heritage;
- Provide an enjoyable experience of nature – the Trail would allow people to sensitively access an area rich in biodiversity and natural heritage;
- Encourage active and healthy lifestyles through recreational use of the Trail;
- Showcase the heritage of this area of South Dublin County in a broad sense – cultural, environmental, archaeological, architectural and historical;
- Enhance the tourism potential and economic development potential for the local community; and'
- Offer future potential links with other walking trails and heritage routes in this area of South Dublin County and adjacent counties.

Brittas has a significant role to play in the achievement of these ambitious, exciting yet achievable objectives. It is also stated in the County Tourism Strategy that the development of the Slade Heritage Trail would be a valuable addition to the proposed suite of clusters and trails available to local residents and visitors alike in South Dublin.

The County Tourism strategy identifies the potential of water-based activities but essentially confines these to Lucan and use of the River Liffey for kayaking and canoeing and to use the Bohernabreena/Kiltipper Reservoir as a recreational amenity.

Table 5 (Tourism Strategy and Development Process) under 'Product Development' identifies the longer term opportunity to develop the upper Kiltipper/Bohernabreena reservoir for a full range of water-based activities but is dependent upon the availability of the reservoir for recreational usage subject to arrangements being agreed with Irish Water and full environmental impact assessments. The lakes at Brittas lakes would not require the imprimatur of Irish Water and could be used for exclusively recreational use and environmental appreciation and enjoyment and subject to the maintenance of water quality. We believe that Brittas Lakes offers a short term opportunity in contrast to Kiltipper/Bohernabreena reservoir which is identified as a longer term project.

The tourism strategy does not recognise the potential of angling in the county and it is estimated that there are 15,000 anglers in South Dublin. Brittas Lakes offer a significant opportunity for anglers.

Finally, it should be pointed out that the key project within the Strategy is the provision of the Dublin Mountains Visitor Centre. There is unquestionably a link potentially available both physically and conceptually between Brittas and Dublin Mountains possibly under the concept 'mountains to lake'.

Slade Valley Corridor and Heritage Trail Feasibility Study

This feasibility study undertaken by this practice in 2014 highlighted the *potential of the lakes in Brittas as an essential part and attractive feature and also a destination in its own right* for those on the trail. The potential of the lakes in the context of the Slade Valley Trail should be accentuated in the emerging Plan and the identification of the wider tourism attractions in the county.

Future Consumer Trends Consumer Planning and Insights 2021

The most recent (July 2021) assessment of current and future directions for tourism in Ireland undertaken by Fáilte Ireland is contained within Future Consumer Trends Consumer Planning and Insights 2021. That document can be found here https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/3_Research_Insights/Consumer%20sentiment%20reports/CPI_Future_Trends_July2021.pdf. The following are the key points:

- Consumers are spending more money on holidays, breaks, their health and wellness;
- They are spending less on material assets and consumer products;
- There is a significant increase on spending on health and wellbeing;
- Growth areas include experience and transformative based tourism experiences including eco-tourism;
- There is a significant increase in 'once in a lifetime' experiences with nature and the environment frequently being at the centre of that developing sector; and,
- Activity tourism continues to expand.

The potential of both the dry and wet lakes in Brittas should be considered in this context.

3.0 The Adopted County Development Plan 2016-2022

Within the adopted County Development Plan the area of Brittas is zoned as "HA – DM High Amenity Dublin Mountains" where development is severely limited except in cases where such HA zoned land is subject to a specific local objective that permits development that would not otherwise be permitted in principle. There is a local objective for the village of Brittas which states as follows:

'CS6 SLO 3:

To support Brittas as a sustainable community and rural village of outstanding natural beauty and to prepare a planning study and study boundary for Brittas Village, in consultation with local residents, landowners and local representatives, having regard to the implications of the proposed Natural Heritage Area designations, the future protection and enhancement of the village, the development of tourism potential in the area with a view to the long term viability of the local community. The planning study to commence within 6 months of the adoption of this County Development Plan and to include an analysis of population and housing data.'

Work on the planning study and study boundary anticipated in adopted Specific Local Objective (SLO) CS6 SLO3 did not start within the 6 months following adoption of the current county plan. In fact, the same SLO has been presented in each of the last 4 no. adopted County Plan without the requested study plan and boundary study ever being commenced never mind completed. For reference, the above SLO has featured in the adopted development plans of 2016, 2010, 2004 and 1999. It is considered that a different approach be applied in policy terms to assist

development proceeding within what is a universally accepted sensitive environment. This is reflected in our suggested rewording of the relevant SLO below.

The only 'permitted in principle' uses and activities identified within HA-DM include agriculture, car parking related to small scale amenities for recreational purposes, and open space. Hotels and public house/bar are identified as 'open for consideration' only where as extensions to existing facilities. New hotels and bars are currently identified as 'not permitted' in principle. Recreational facilities are considered open for consideration where linked to enhancement of the heritage and amenity value of Dublin Mountains. Sports facilities are open for consideration below the 350m contour which applies to this site.

4.0 The Emerging County Development Plan

The Draft County Development Plan under Policy QDP12: Sustainable Rural Neighbourhoods seeks to:

'Protect and promote the sense of place and culture and the quality, character and distinctiveness of the County's rural hinterland that makes it an attractive place to live, work and visit.'

Our client supports this policy. That policy is accompanied by the following objectives.

QDP12 Objective 1: To support the development of new initiatives such as walking trails connecting villages and smaller rural settlements, both for the enjoyment of local people and as an attractor for visitors to the area, promoting sustainable local economic development.

QDP12 Objective 4: To promote appropriate development that enhances the character and vitality of the existing settlements and which does not negatively impact on existing residential amenity.

QDP12 Objective 5: To ensure any proposals for development within rural settlements (subject to local need criteria being established as per Chapter 6 of this plan) demonstrates a high-quality design response and will not impact negatively on the character and amenity of the existing settlement. In determining a design response, new developments should reference the elements of the settlement that give character and a sense of place, such as: the urban grain of the historic core, existing buildings of high architectural merit and local characteristics (such as local materials, building lines, walls, building heights, rivers, streams, trees/hedgerows and other local landscape features).

The SLO that is of primary interest to our client, and which replaces CS6 SLO 3 in the adopted plan, is QDP12 SLO1, which states the following.

'QDP12 SLO 1: To support Brittas as a sustainable community and rural village of outstanding natural beauty and to prepare a planning study and study boundary for Brittas Village, in consultation with local residents, landowners and local representatives, having regard to the implications of the proposed Natural Heritage Area designations, the future population and enhancement of the village and to development of a tourist and leisure facility to include accommodation, associated services and activities at Brittas Ponds and surrounding lands with a view to maintaining and protecting existing assets and the long-term viability of the local community. The planning and tourism study shall be commenced within 12 months of the adoption of

this County Development Plan and shall include an analysis of population and housing data.'

Our client supports the above QDP12 SLO1 with relatively minor amendment as identified below in the next section.

Our client supports the following policies and objectives.

Policy EDE19: Tourism Infrastructure Support the development of a sustainable tourism industry that recognises the recreational and tourism potential of the County, building on the actions in the South Dublin County Tourism Strategy, 2015 or any superseding strategy.

EDE19 Objective 1: To support the development of tourism infrastructure, attractions, activities and facilities at appropriate locations subject to sensitive design and demonstrated environmental safeguards.

EDE19 Objective 2: To direct tourist facilities into established centres, in particular town and village centres, where they can contribute to the wider economic vitality of urban centres.

EDE20 Objective 2: To support the development of local tourist and heritage trails at suitable locations including across the Dublin Mountains, and between and within Brittas-Saggart-Rathcoole; Clondalkin; Lucan; Newcastle-Lyons; Rathfarnham; and Tallaght and seek to make such trails interactive through the use of sensitive signage and the further development of mobile application software ensuring in HA DM that all such trails are sensitively landscaped and designed to ensure positive impact on biodiversity and visual amenity.

Policy EDE21: Tourism and Leisure Activities Support and facilitate the development of leisure activities in the County.

EDE21 Objective 1: To promote the active use of managed forests for tourism and leisure related activities subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.

EDE21 Objective 3: To support the development of water-based tourism and leisure activity, subject to an appropriate scale of development having regard to the pertaining environmental conditions and sensitivities, scenic amenity and availability of services.

4.0 Our Client's Requirements

Our client seeks the following amendment of the aforementioned QDP12 SLO1 with strikethrough reflecting our suggested deletions and additional text indicated in bold.

*'QDP12 SLO 1: To support Brittas as a sustainable community and rural village of outstanding natural beauty and to prepare a planning, **ecological and tourism study assessment** and **study boundary identification of a sustainable development boundary** for Brittas Village, in consultation with local residents, landowners and local representatives, having regard to the implications of the proposed Natural Heritage Area designations, the future population and enhancement of the village and to development*

*of a tourist and leisure facility to include accommodation, associated services and activities at Brittas Ponds and surrounding lands with a view to maintaining and protecting existing assets and the long-term viability of the local community. The planning, **ecological** and tourism **assessment** study shall be commenced completed within 12 months of the adoption of this County Development Plan and shall include an analysis of population and housing data.'*

Our client seeks the incorporation of the following text in bold into the second paragraph under the heading 'Brittas' in Section 5.3:

*'Brittas is strategically located on the N81 national secondary route and continues to experience development pressure; particularly one-off rural housing within the surrounding rural area. Its location at the Dublin Mountains presents opportunities for tourism development which could support the local economy. **Brittas has recently experienced population decline but has the potential to benefit from potential linkages and complementarity to the Dublin Mountains Visitor Centre with a 'mountains to lake' experience for residents and visitors to the county. The provision of public access to the adjacent lakes has the potential to significantly enhance water leisure and tourism activities within the county having regard to sensitive design, siting and environmental safeguarding.** (as per EDE19 Objective 1 (active tourism uses) and EDE21 Objective 3 (promotion of water based activities)).*

We request that EDE19 Objective be modified as follows to recognise that tourism facilities and amenities are tied very much to where the tourism asset is located which may not be wholly within a village or urban environment. The suggested amendment with requested additional text in bold is set out below.

*'EDE19 Objective 2: To **normally** direct tourist facilities into established centres, **where this is possible**, in particular town and village centres, where they can contribute to the wider economic vitality of urban centres.'*

We suggest the following new objective to be incorporated into Policy EDE21 (Tourism and Leisure Activities) which would be most appropriately added directly after EDE21 Objective 3 (Development of water based tourism and leisure activity).

'New EDE21 Objective 4: To enhance public access to existing water features and bodies for tourism and leisure purposes within the county subject to the maintenance of high levels of water quality.'

We request the following additional objective to Policy EDE21 (Tourism and Leisure), possibly a new EDE21 Objective 7.

'Promote angling within the county subject to the adequate maintenance of fish stocks and water quality and environmental assessment.'

We believe that the potential of the Brittas lakes is supported by other parties, in at least one other submission, who would also like to see access to and use of the lakes enhanced for a range of activities in a sustainable and environmentally sensitive manner.

5.0 Conclusions

Our client welcomes the review of the South Dublin County Development Plan and supports the overall approach to tourism within the county. The emerging significant trends in tourism, including active or experience based tourism, can be facilitated at Brittas through the sensitive utilisation of the lakes as a water based amenity that will significantly add to the limited active water based tourism facilities and activities available on the River Liffey at Lucan and potential use of the reservoir at Kiltipper/Bohernabreena (subject to approval from Irish water). Access to the dry lake would also be such a unique feature as to stimulate eco based tourism in the area to complement the activity and experienced based attractiveness of the wet lake.

Our client supports QDP12 SLO1 with some modification of that same SLO suggested as follows:

*'QDP12 SLO 1: To support Brittas as a sustainable community and rural village of outstanding natural beauty and to prepare a planning, **ecological and tourism study assessment** and ~~study boundary~~ **identification of a sustainable development boundary** for Brittas Village, in consultation with local residents, landowners and local representatives, having regard to the implications of the proposed Natural Heritage Area designations, the future population and enhancement of the village and to development of a tourist and leisure facility to include accommodation, associated services and activities at Brittas Ponds and surrounding lands with a view to maintaining and protecting existing assets and the long-term viability of the local community. The planning, **ecological and tourism assessment** study shall be commenced **completed** within 12 months of the adoption of this County Development Plan and shall include an analysis of population and housing data.'*

The suggested amendment with requested additional text in bold below.

*'EDE19 Objective 2: To **normally** direct tourist facilities into established centres, **where this is possible**, in particular town and village centres, where they can contribute to the wider economic vitality of urban centres.'*

We suggest the following new objective to be incorporated into Policy EDE21 (Tourism and Leisure Activities) which would be most appropriately added directly after EDE21 Objective 3 (Development of water based tourism and leisure activity).

'New EDE21 Objective 4: To enhance public access to existing water features and bodies for tourism and leisure purposes within the county subject to the maintenance of high levels of water quality and environmental assessment.'

We request the following additional objective to Policy EDE21 (Tourism and Leisure), possibly a new EDE21 Objective 7 as follows.

'New EDE21 Objective 7: Promote angling within the county subject to the adequate maintenance of fish stocks and water quality.'

We suggest the following text be inserted into section 5.3 accompanying QDP12 SLO1.

Brittas has recently experienced population decline but has the potential to benefit from potential linkages and complementarity to the Dublin Mountains Visitor Centre with a 'mountains to lake' experience for residents and visitors to the county. The provision

of public access to the adjacent lakes has the potential to significantly enhance water leisure and tourism activities within the county having regard to sensitive design, siting and environmental safeguarding.

That requested insertion into the accompanying text of QDP12 SLO1 contained within Section 5.3 is entirely consistent with as per EDE19 Objective 1 (Active tourism uses) and EDE21 (Objective 3 promotion of water based activities) as well as the adopted tourism strategy of the County Council which significantly promotes Brittas as a significant tourism destination and asset.

We trust you will consider the submission in the formulation of the emerging plan.

Should you require any assistance on this matter please do not hesitate to contact the undersigned.

Regards,



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