

Submission to Draft South Dublin County Development Plan 2022-2028

by Fáilte Ireland



Introduction

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to the invitation for submissions on the Draft South Dublin County Development Plan 2022-2028 ('the Draft Plan') by South Dublin County Council ('the Council').

Fáilte Ireland welcomes the opportunity to engage with South Dublin County Council on the emerging Plan for the County and to build on the well-established relationship between Fáilte Ireland and the Council working together.

The preparation of this submission comes at a time when Fáilte Ireland is emphasising the need for land-use plans to manage all land uses and economic drivers – of which tourism is but one, in a more holistic, strategic and spatial manner to maximise the efficient use of resources and the achievement of greater outcomes for society at large.

Overall the Draft Plan includes references to tourism relating to some areas. However, the following may allow the Council to complete the Plan. We hope that this submission can represent another step in a collaborative process that culminates in the adoption of the new Development Plan.

For ease of reading, we have structured this submission as follows:

- 1. The Objective of the Submission**
- 2. Commentary on the Draft Plan;**
- 3. Proposals for the South Dublin County Development Plan**
 - 3.1 Additional Tourism Considerations
 - 3.2 Additional Suggested Text Insertions
- 4. Conclusion**

1. The Objective of this Submission

Fáilte Ireland has prepared this submission to support and assist South Dublin County Council in the formulation of planning policies and frameworks for the period 2022-2028. Fáilte Ireland is seeking to enhance the partnership approach between the Council and Fáilte Ireland and ensure that the expertise of both organisations is shared.

The submission seeks to enhance the policy coverage in the Draft Development Plan to ensure a meaningful framework is established for the enhancement of tourism in the County, and the wider region, during the Plan period. It has been prepared with inputs from professional planners as well as various strands within Fáilte Ireland. It provides the Council with a concise single submission from Fáilte Ireland dealing with all aspects of tourism – from strategic planning, to visitor experience and destination management.

The submission has been prepared having regard to the tourism profile of the County; the existing policy context in the Draft Plan; and an established template for sustainable tourism policies being used by Fáilte Ireland to guide Planning Authorities.

2. Commentary on the Draft Plan

Fáilte Ireland is generally supportive of the Draft Plan and notes that some of the suggestions or references included in our Issue Paper submission have been included in the Draft Plan. We again welcome the opportunity to assist the Council in the important area of policy preparation. Fáilte Ireland is acutely aware of the complex range of issues that a Development Plan must tackle. It is also mindful of both the responsibilities and limitations of the prevailing legislation and the role that the Development Plan plays in a statutory context. Our submission has been fully informed by these considerations.

It is considered in terms of tourism that the draft Plan does not fully set out the value of tourism as a key economic driver, the potential development and the role tourism will play for the future of South Dublin as it sits within the wider Dublin context. As noted in our Issue Paper submission, Fáilte Ireland, as a standard approach, typically requests that a key element of any emerging Development Plan should include a dedicated chapter on tourism in order to provide the required focus on tourism for the County as a whole however it was noted that in the case of South Dublin, and its more urban context of the Council area, that a Tourism and Recreation was considered appropriate.

While the draft Plan does include a Tourism & Leisure Section within Chapter 9, given the relative value of tourism to the County economically, socially and culturally, and the profile and significance of South Dublin's tourism offering within the 'Dublin- Surprising by Nature' brand it is considered that the tourism section could be more robust in the Draft Plan.

We welcome the reference to the South Dublin County Tourism Strategy and suggest that the Development Plan acknowledges the expiration of the Tourism Strategy during the lifetime of the Development Plan and should include an objective to review and prepare an updated South Dublin County Tourism Strategy.

3. Proposals for the Draft South Dublin County Development Plan

We have prepared this part of the submission drawing on existing strategies for the enhancement and management of tourism in the County.

Proposed information and statements are based on identified gaps in policy coverage and recommended good practice in the area of sustainable tourism. We have set out explanatory text for discussion among the plan-writing team and in some instances then included suggested text or policies intended for consideration as a direct insert to the Plan itself.

It is considered that a countywide focus is required so that areas outside the traditional tourism locations or attractions can benefit from the synergies and linkages provided by existing and proposed access and investment. Potential exists to position the County as the gateway to the Dublin Mountains and to direct infrastructure to less accessible areas and attractions in the County.

3.1 Additional Tourism Considerations

Regional Tourism Plan (RTPs)

Fáilte Ireland is in the process of preparing Regional Tourism Strategies for each of the four Regional Experience Brands (Dublin, Wild Atlantic Way, Ireland's Ancient East and Ireland's Hidden Heartlands). The purpose of the Regional Tourism Strategies is to identify the sustainable tourism development priorities that will help to unlock the commercial potential of the region bringing benefits to all stakeholders and industry. Each plan will be prepared based on the VICE model which is a methodology for working towards sustainable tourism that seeks to strike an appropriate balance between the needs of the Visitor, the Industry and Community and the Environment. The plans will be for the period to 2025 and will be grounded in Fáilte Ireland's new Corporate Strategy. There will be a strong spatial element to the plans which will seek to identify where development should take place in order to unlock the tourism potential of the region.

The Regional Tourism Strategies will also provide a strategic framework for a suite of Destination and Experience Development Plans (DEDPs) which will sit underneath them. They will set out the overall goals of each of the proposed DEDPs as well as the timing and sequence for the preparation of these plans. A number of DEDPs are already in progress. Once the RTSs are in place by, they will become primary reference documents to inform Fáilte Ireland's

submissions on County and City Development Plans. This will ensure that our submissions on County and City Development Plans are informed by a strong regional context in addition to the agreed tourism needs of each county or city. The Local Authorities will be consulted on the preparation of the RTPs which will also be subject to Strategic Environmental Assessment.

We request the inclusion of an objective supporting the preparation and implementation of Regional Tourism Strategies in the County Development Plan, to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these tourism plans.

Destination Experience Development Plans

We welcome discussion of the visitor experience in the Draft Plan, however in order to further develop the visitor experience however we request specific reference to Fáilte Ireland Destination Experience Development Plans (DEDPs). The key to unlocking the growth potential of an area is the development of experiences that will motivate potential visitors to firstly visit there and secondly to dwell in the area. These new experiences are less concerned with visitors passively seeing or doing things; they encourage visitors to immerse themselves actively in the locale, interacting with people, engaging the senses, and learning the history and stories of the places. Fáilte Ireland's response to this challenge has been the creation of a framework to develop and deliver Destination Experience Development Plans along with strengthening destination towns. This approach identifies the key assets of an area and provides a framework to present the experiences and stories of that area in a way that visitors can readily and easily understand. It clearly identifies tangible actions and a process for businesses to shape their respective visitor experience(s) in line with the overall experience brand proposition and the key motivating themes for their area.

We request an objective acknowledging and supporting these Destination Experience Development Plans. We wish to see an objective supporting continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these Destination Experience Development Plans.

Destination Towns

As part of the €15.5 million 'Destination Towns' initiative launched in 2019 by Fáilte Ireland funding was allocated for Lucan. We wish to see this investment identified as a catalyst for further interventions by SDCC. Key interventions can include improved public realm, improved wayfinding and signage, the promotion of town facilities and tidy towns initiatives. Lucan has excellent links via greenways and the River Liffey which could allow visitors explore County Dublin outside the city centre by bicycle or water-based recreational activity.

There is a Tourism Development and Proposition Plan in progress for Lucan, this will set out a pathway for the development of tourism for the area and help to create Lucan as a tourism destination of note within the Dublin region.

Platforms for Growth Investment Programme

A capital investment programme worth €150 million and will run from 2019 to 2022. Major new visitor attractions of scale will be developed and existing attractions greatly enhanced under the programme which falls under the Government's Project Ireland 2040 strategy.

Accessible Tourism

In order to improve the experience of those who live and visit South Dublin County, the Council should promote accessible tourism in the county. This entails ensuring that facilities are accessible to people with mobility issues, people with learning disabilities, visual or hearing impairment, young children and elderly people. Achieving a high level of accessibility is both socially and economically important. It is considered that the Development Plan would benefit from the insertion of a section on Accessible Tourism and the incorporation of the following Policy Objective.

Proposed new policies, to be inserted into Section 9.9 Tourism Section:

It is an objective of the Council to support the provision of accessible tourism.

Digitalization/Tourism Industry

The fallout from the COVID-19 pandemic has heightened the need for both attractions and activity providers to dramatically improve their online booking capability. Digitalisation presents opportunities for businesses to expand their market reach, increase growth and improve operational efficiencies as well as enhancing the visitor experience and improving destination management. Websites, booking facilities and digital distribution technologies must be adopted to target those in the planning phase of their trip and those that are already in-destination researching things to see and do.

We consider that the CDP should support the tourism sector to invest in digital technology, with a particular focus on sectors with low digital presence such as visitor attractions and activities.

Proposed new objective, to be inserted in Section 9.9 Tourism Section

Encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitor attractions and activities with low digital presence and/or integration.

Sustainable Tourism

The approach to Tourism in the County Development Plan needs to place a strong emphasis on 'Sustainable Tourism'. This is defined as '*tourism that takes full account of its current and future economic social and environmental impacts, addressing the needs of visitors, the industry, the environment and host communities*'.

As the National Development Authority for tourism in Ireland, Fáilte Ireland recognises and will continue to ensure that all tourism initiatives it is involved in are planned, developed and managed in a sustainable and integrated manner. There is limited reference to Sustainable Tourism in the Development Plan and it should be considered in a dedicated sub-section to ensure it is enshrined throughout tourism policy for the county.

Outdoor Tourism Experiences

The Dublin brand proposition speaks to the unique position of the capital, with a vibrant city centre, nestled between the mountains and an extensive coastline. There is a growing consumer segment that wants to get out in nature and have outdoor experiences, particularly walking but also cycling and water-based activities. Dublin City and South County Dublin is well positioned to develop motivating tourism outdoor experiences that can tap into this need.

We believe people enjoy spending time by the water and that investment in the public realm and, pedestrian and cyclist facilities near canals and rivers will contribute significantly to the enjoyment and accessibility of a city. The quantity of frontage Dublin has with the River Liffey, the Canals and other rivers, provides an unparalleled opportunity to improve public access to the waterfront. The Royal and Grand Canals are two historic and important arteries that are a significant part of the fabric of community and economic development in Dublin for over 200 years. While the canals no longer provide the essential trade connections they once did, they offer new economic potential as corridors for leisure and tourism activity in the heart of Dublin. Fáilte Ireland and Waterways Ireland carried out a feasibility study to investigate the tourism potential of a Dublin City Canals Greenway in 2019. The feasibility determined that a circular Greenway loop linking the two canals would deliver a ‘world-class city greenway experience that would inform, inspire and energise. It would become a must-do experience for visitors to Dublin that want to get beneath the skin of the city and to explore its neighbourhoods, communities and history while enjoying nature in and around the city’.

Given the change in consumer/tourist habits following the COVID-19 pandemic, it would be Fáilte Ireland’s ambition to see a tourism greenway developed linking the two canals. This would open up the outdoors and link Dublin’s top visitor attractions and activities to a safe and segregated circular Greenway, providing local, national and international visitors with a new and sustainable way to explore Dublin. Fáilte Ireland would like to continue work with Waterways Ireland and South Dublin County Council to deliver this tourism Greenway for Dublin.

The provision of boardwalks, cycle and jogging paths along these waterways creates an amenity for residents and visitors to the city centre. Such an amenity would provide an exciting opportunity to significantly improve the amenity value of Dublin. The Council should support the continued animation of and improve access to its waterways. The development of greenways along the City’s canals and rivers should continue to be a priority, areas such as the Grand Canal Basin and the Dodder are not fully accessible, and investment in these areas will allow people to enjoy the amenities. The continued partnership and collaboration with

Waterways Ireland, Fáilte Ireland and South Dublin County Council should be supported in the forthcoming Development Plan.

Food Tourism

Food and beverage consumption accounts for 35% of all international tourism revenues, its offering has a significant role to play in delivering great visitor experiences, increasing dwell time around the country and increased visitor revenue. South Dublin County food destination needs to be strengthened and supported. This can be done by the Council contributing actively to the development of great visitor experiences in food tourism by providing support for key food initiatives such as food festivals and urban outdoor markets that create an opportunity for local food producers/providers to showcase their food and beverage offering, create a sense of community and provide a great visitor experience.

3.3 Additional Suggested Text Insertions

Section 3.3.4 Dublin Mountains

We welcome the identification of the importance of the Dublin Mountains in the draft Plan and acknowledge the Plan's reference to striking a balance between the potential for recreation and tourism and the landscape and environmental sensitivities. It is considered however that the draft Plan could further identify South Dublin's position as the gateway to the Dublin Mountains and identify policies and objectives to build upon this potential.

It is requested that the Development Plan should commit to improving access to the Dublin Mountains through the inclusion of the following objective:

Proposed new objective, NCBH6 Objective 8:

To improve access to the Dublin Mountains the Council will identify potential for improved public transport, walking and cycling routes, improved wayfinding, interpretation, orientation and visitor hubs, and will engage with relevant stakeholders to deliver on this infrastructure.

Transport is an essential consideration and tourism displays a very high dependency on public transport in particular for its successful operation. International tourists visiting Ireland expect a high-quality transport system. A good transport system is a key enabler to creating a great visitor experience and ensuring its wider sustainability. Improved signage, frequency and convenience are important areas to increase usage.

Given the region's close proximity to Dublin City and high quality transportation such as the LUAS there is great potential to ensure tourist amenities are accessible via sustainable transport. While urban areas of South Dublin are highly accessible via Dublin Bus, and the LUAS, upland and rural areas are more difficult to access. The potential for electric buses and cycling infrastructure in this regard should be explored.

Proposed new objective, NCBH6 Objective 9:

To engage with relevant transport stakeholders to identify the potential for improved public transport, including the potential for electric buses and cycling infrastructure, to the Dublin Mountains.

Section 9.9- Tourism and Leisure

We welcome reference to the 'Dublin- Surprising by Nature' Brand however request the following text amendment and the incorporation of a supporting objective within the Development Plan.

Proposed amended text Section 9.9

In continuing the positive working relationships through the Dublin Tourism Working Group with Fáilte Ireland to make the best use of the 'Grow Dublin' tourism project and the 'Dublin - Surprising By Nature' ~~marketing concept~~ Brand...

Proposed new Policy EDE19 Objective 5

Promote, encourage and facilitate the implementation of the 'Dublin Brand Proposition and its objectives in co-operation with Fáilte Ireland, the Dublin Tourism Working Group and adjoining local authorities.

Collaboration with Fáilte Ireland and other Tourism Stakeholders

We wish to see an objective supporting continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of Fáilte Ireland's initiatives and key tourism related infrastructure.

Proposed new objective in Section 9.9 Tourism Section

To continue to engage and collaborate with tourism stakeholders including Fáilte Ireland to deliver on the Tourism objectives for the County.

Tourism Objectives

The following amendments to policies and objectives included in the draft Plan are requested:

Proposed amended Policy EDE19: Tourism Infrastructure

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

Proposed amended Policy EDE20: Greenways, Trails and Loops

To support and facilitate the development of an integrated network of Greenways, Greenway Loops and Urban Greenways to encourage tourism and active travel across the County, subject to environmental considerations.

Proposed amended Policy EDE21: Tourism and Leisure Activities

EDE21 Objective 3: To support the development of water-based tourism and leisure activity, and support both the enhancement of existing and development of new access to water locations in the County for recreational purposes. The provision of shared facility centres for water-based activities in the County subject to an appropriate scale of development having

Chapter 13 Implementation and Monitoring

We welcome the 'High Amenity Zonings relating to the Dublin Mountains, Liffey Valley and the Dodder. It is considered that the Council might consider amending the Open for Consideration Uses on this to include for Camp Site, similar to Open Space. It is considered that the potential for alternative accommodation types, subject to relevant environmental considerations, should not be limited in these land use categories.

4. Conclusion

We wish to take this final opportunity to commend the Council on the Draft Development Plan and reiterate the commitment of Fáilte Ireland to working with the Council on achieving the Plan objectives over the coming years.

In relation to any follow up to this submission please contact:

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