

Submission to Draft Louth County Development Plan 2021-2027

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 Louth County Development Plan 2021-2027 ('the Draft Plan') by Louth County Council ('Council').

The Authority welcomes the opportunity to engage with Louth County Council on the emerging Plan for the County and to build on the well-established relationship between the Authority and the County Council working together.

The preparation of this submission comes at a time when Fáilte Ireland are 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.

We hope that this submission can represent another step in a collaborative process that culminates in the adoption of the new Development Plan.

Overall, the Draft Plan includes numerous references to Tourism throughout relating to a number of areas. We welcome the inclusion of a dedicated Tourism Chapter, however, the following may allow the County Council to complete the Plan.

The Objective of this Submission

Fáilte Ireland has prepared this submission to support and assist Louth County Council in the formulation of planning policies and frameworks for the period 2021 – 2027. Fáilte Ireland are seeking to enhance the partnership approach between the County Council and the Authority 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 the Authority 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.

The Structure of the Submission

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

- **Commentary on the Draft Plan;**

- **Proposals for the Louth County Development Plan**
 - Suggested Text Insertions
 - Additional Contextual Information
 - Commentary and Proposals on Policies and Objectives

Commentary on the Draft Plan

The Authority is generally supportive of the Draft Plan and again welcomes the opportunity to assist the County Council in the important area of policy preparation. The Authority 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.

The key comments the Authority would like to make in respect of the current draft plan are as follows:

- **Chapter 1 Introduction-** Chapter 1 sets out that the Draft Plan is a step change from the current Development Plan noting that the Plan replaces a number of existing statutory land use plans for the County. A holistic approach to the County is considered a real opportunity to set out a singular approach and it is considered this is achieved in the draft Plan. We welcome the identification of the role of Drogheda *‘as the gateway to the Boyne Valley Region’* and its associated significant tourism potential both within and beyond the town.
- **Chapter 2 Core Strategy and Settlement Strategy** - Chapter 2 sets out the County’s Core Strategy in terms of Housing, Economic Development and Climate Action within the Hierarchy of Regional and National Plans, Regional Spatial Economic Strategy and the National Planning Framework.

We welcome inclusion of the vision statement which refers to those who visit and to the *‘natural and built environment, cultural experiences,’* the vision statement states:

Commentary on the Draft Plan contd.

Promote County Louth, in particularly the Regional Growth Centres of Drogheda and Dundalk, as uniquely attractive places in which to live, work, visit, and do business and where the quality of employment and educational opportunities, natural and built environment, cultural experiences and provision of inclusive communities are to the highest standards.

It would be useful to include further reference to tourism in this chapter in order to provide greater detail as to how the vision statement will be realised. This is discussed further in the following section

- **Chapter 5: Economy and Employment** – This chapter sets out the vision and strategy for economic development in the County during the life of the Draft Plan. It will identify the opportunities for Louth to strengthen its economic base and continue to attract investment and support job creation for both indigenous and international businesses.

Tourism is referenced in several places within this Chapter, in particular we note Section 5.19 which acknowledges the roles tourism plays in the rural economy through diversification as well as references to the blue economy. We wish to see further detail in this Section, supporting the role of rural based tourism enterprises that can play a key part in the County's economic development.

- **Chapter 6: Tourism** - The overall strategy for Tourism within the County is detailed in this chapter. The principal tourism initiatives, strategies and locations are identified and supporting policy is set out for each. The chapter emphasises the importance of the County's natural environment, rich and varied heritage and numerous cultural

Commentary on the Draft Plan contd.

attractions as key drivers for the sector. We welcome reference to and support for Fáilte Ireland's brand initiative 'Ireland's Ancient East' and promotion of other visitor experiences.

The structure of the chapter is as follows:

- **Policy Context**
- **Tourism Attractions Within County Louth including:** Greenways - Walking and Cycling Routes; Heritage Tourism; Food and Craft; Beaches; Events and Festivals; Additional Tourism Experiences; Narrow Water Bridge; Carlingford Lough Ferry
- **Fáilte Ireland Strategies:** Ireland's Ancient East
- **Tourist Accommodation:** Hotel, Guest House and Bed & Breakfast Accommodation; Self-Catering Accommodation; Caravan and Camping Sites; Hostels; Short Term Lettings
- **Visitor And Habitat Management**

Overall, we welcome the inclusion of a dedicated Tourism Chapter and the detail provided within. However, further suggestions are set out in the following section of this submission which may help complete the Plan.

- **Chapter 8 'Natural Heritage, Biodiversity and Green Infrastructure':** County Louth boasts a rich natural and built heritage, which contributes substantially to the County's character, identity and sense of place. Overall, we note few references to tourism in this Chapter. Tourism development must be balanced with the protection of the natural environment, a key attractor itself, and the people who live in these areas.

Commentary on the Draft Plan contd.

Ongoing environmental management of amenities and managing visitor expectation is crucial to sustainable tourism in the County.

We note objective NBG 27 in relation to ‘Louth Landscape Character Assessment’. We welcome the intention of the objective to review / update the Landscape Character Assessment 2002 but request this be prepared as soon as possible and contain appropriate reference to tourism amenities. Tourism amenities are sensitive to visual impacts and can be negatively impacted by inappropriate development, as such tourism should be included as a sensitive receptor.

- **Chapter 9 ‘Built Heritage and Culture’:** this Chapter aims to protect, conserve and manage the archaeological and architectural heritage of the County and encourage sensitive, sustainable development to ensure its survival and maintenance for future generations. Built heritage considerations have important synergies with tourism considerations.
- **Chapter 11–Environment, Natural Resources and The Coast:** this Chapter refers to Tourism in a number of ways. The overall purposed of the Chapter is to harness the County’s natural and coastal resources in a manner that is compatible with the sensitivity of rural areas, the existing quality of life, and the protection and enhancement of the county’s natural environment. Sustainable and Eco-Tourism have obvious overlap in this regard. The Chapter emphasises the importance of protecting pristine and wild places that act as biodiversity hubs, contribute to health and wellbeing and provide sustainable tourism opportunities.

Proposals for the Draft Louth 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 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 then included boxed text intended for consideration as a direct insert to the Plan itself.

Louth has an excellent tourism product and is well placed as a key part of one Fáilte Ireland's brand initiative's, Ireland's Ancient East to optimise the potential for tourism through proper planning and development. The consideration of natural and heritage resources, strategic planning for accommodation and promotion of inter-agency tourism strategies in the Development Plan will build on the previous success of strong tourism consideration in Development Plans.

Chapter 2- Core Strategy

While the Vision Statement does acknowledge those who visit, we wish to see this intention further detailed as part of the Core Strategy which should include reference to tourism. Inclusion of tourism within Louth's Growth Strategy (Section 2.4.4) at this strategic level would allow tourism considerations to feed into a county wide strategy. We note reference to supporting viability and vibrancy of small towns, to which tourism could make a key contribution. We recommend a specific Strategic Objective relating to Tourism, acknowledging it as a key economic driver. This would help achieve the Development Plan's vision. It is considered wording in line with Policy Objective TOU 4 contained in Chapter 6 could be considered in this regard.

Proposals for the Draft Louth County Development Plan contd.

Proposed new policy, to be inserted in Section 2.4.4:

Support and promote tourism in the county as a key economic driver in a sustainable manner that is compatible with the sensitivity of rural areas, the existing quality of life, and the protection and enhancement of the county's natural environment.

Chapter 5- Economy and Employment

Section 5.19 relates to the Rural Economy, we wish to see additional detail in this Section as Tourism can play a significant role in this regard.

The diversification of the rural economy can supplement existing rural incomes and add to the richness of the rural area. The Planning Authority recognises that a balance needs to be maintained between facilitating appropriate forms of rural development and protecting the rural environment. Farm based enterprise including agri-tourism, artisan food and drink, open farms/pet farms, equestrian, forestry recreation or creative industries should be facilitated subject to environmental and development management standards.

Encouraging small scale tourism entrepreneurship can provide a much needed boost to the local economy as spending by those visitors stays in the local economy. In addition proactive planning policies including those facilitating the provision of supporting infrastructure such as visitor car parking, toilets, café or catering facilities – particularly in sensitive or more rural locations can encourage tourism entrepreneurship and support existing and proposed green infrastructure such as walking and cycling routes.

Proposals for the Draft Louth County Development Plan contd.

Proposed new policy, to be inserted in Section 5.19:

To promote the sustainable diversification of the rural economy through the promotion of farm or rural resource related enterprises such as agri-tourism, artisan food and drink, open farms/pet farms, equestrian, forestry recreation or creative industries subject to normal planning and environment criteria. The scale of the facility should be appropriate to the rural character of the area.

Chapter 6- Tourism

Chapter 6 contains a good range of tourism objectives to support the tourism sector and stakeholders in the county. However, the following amendments would ensure the Chapter provided a more complete strategy for County Louth. Many of Fáilte Ireland's comments included within their pre-draft submission have been addressed in the Draft Plan with specific reference included in Section 6.4.

Proposed text, to be inserted in Section 6.1:

It is suggested that the following text should be incorporated into Section 6.1:

Tourism is one of the largest and most important sectors of the national economy, providing employment for approximately 260,000 people, an economic contribution of €7.8 billion (excluding carrier receipts), and exchequer revenue of €1.8 billion, which helps fund other key public services. With regard to County Louth, Fáilte Ireland's figures indicate that 1% of overseas visitors overnight in Louth generating a similar share of revenue.

Proposed text, to be inserted in Section 6.3:

We request the inclusion of a map of similar scale and detail to that included in the Core Strategy ‘Figure 3-1 Core Strategy Map’ in order to illustrate the tourism strategy for the County. Such a map should illustrate:

- Key **nodes** of tourism activity in the County – both existing and proposed specific tourism centres (major tourism attractions, water access etc.); including the list of key assets.
- Existing transport **links** between nodes and identified routes– whether walking, cycling or road based including greenways and blueways.
- **Strategic tourism centres** (principal towns containing tourist facilities) where key services such as hotels etc. are located; further guidance is available here:
<https://www.failteireland.ie/FailteIreland/media/WebsiteStructure/Documents/Publications/Failte-Ireland-Tourism-Destination-Towns-Guidelines.pdf?ext=.pdf>
- **Sensitive environments** where the provision of services must be sensitive and appropriate to the robustness / sensitivity of the receiving environment and in particular its existing tourism significance;
- **Areas of unrealised tourism potential** where proactive policies will aim to encourage the development of this sector.
- **Branding** – reference and use of Fáilte Ireland Tourism Brand logos applicable to the county i.e. Ireland’s Ancient East.

Proposals for the Draft Louth County Development Plan contd.

Accessible Tourism

In order to improve the experience of those who live and visit Louth, 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 a section on Accessible Tourism be inserted into Section 6.3.

The biggest limitation in investment in AT improvements thus far is the limitation and gaps it has in regard to provision of consumer-focused Accessibility Information – by way of a Destination Accessibility Guide for its key hubs and also the Local Authority owned and managed tourism sites (and any other provides sites who have invested as well as any investment in Accessible Tourism by accommodation providers and transport service providers). The three core pillars for Accessibility are:

- Information - for Visitors to allow them to consider and plan a visit to the destination/experience (by way of an Accessibility Guide)
- Training - for staff and Business Owners in anticipating, meeting, and dealing with Accessible customer needs
- Facilities/Services - investment, provision, and low-cost improvements

Louth could benefit from having a one stop shop for information on its Accessibility as a tourism destination on either its visit Louth site or its Local Authority site, in an easy to access Accessibility Guide for visitors and have it available

Proposals for the Draft Louth County Development Plan *contd.*

Proposed new policies, to be inserted in Section 6.3:

To facilitate, where appropriate, proposals to improve access for all at existing tourism sites and facilities, and to require all new tourism related developments to ensure the development is accessible to everyone, regardless of their age, or ability.

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

To ensure all projects and improvements will adopt the principles of Universal Design

To undertake an Accessibility Audit within the lifetime of the Development plan to inform Accessible Tourism priority investments at key tourism hubs

Section 6.4

We welcome discussion of the Fáilte Ireland strategies including the recognition of Drogheda as a 'Destination Town' and reference to initiatives such as Ancient Visitor Experience Development Plan however in order to further develop the visitor experience it may be beneficial to encourage the development of further visitor experience plans.

We request a specific objective acknowledging and supporting future 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.

Proposals for the Draft Louth County Development Plan *contd.*

The development of Destination Experience Development Plans can provide a comprehensive and holistic response to ensuring Louth attractions and activities are appreciated and appeal to visitors. Vitally, these plans will be delivered in a way that encourages visitors to spend more time in an area, without compromising the environment or culture of the region.

We welcome the inclusion and reference to the Fáilte Ireland branding of Ireland's Ancient East. We would request that the branding logos (as included on the front of this submission for reference) is included to increase brand awareness in the new Development Plan.

Proposed new policy, to be inserted in Section 6.4:

To support and work with Fáilte Ireland on the development and implementation of Destination Experience Development Plans.

Chapter 7- Movement

Section 7.6 should identify that towns and villages are important attractions in themselves and can increase visitor dwell time and expenditure in local businesses and communities. The section should make particular reference to Covid-19. As seen during recent months in many parts of the country the popularity of cycling and walking has increased significantly throughout the Covid-19 pandemic. A greater focus on pedestrian, cyclist and public realm facilities should be placed in the new Development Plan.

Proposals for the Draft Louth County Development Plan contd.

In the context that outdoor events and gatherings are going to play a more pivotal role in attracting visitors and events to towns and villages, high quality public realm and external spaces should be identified and prioritised for delivery. In this regard improvements to public realm spaces should consider the visitor perspective and the ability of these spaces to facilitate and accommodate stimulating new experiences e.g. festivals/performance spaces etc.

Chapter 9- Built Heritage and Culture

The relationship between tourism and heritage has potential synergistic benefits. The preservation of heritage to improve tourism can in turn support that preservation. This is not restricted to heritage sites and should also include elements such as urban design (e.g. shop frontage restrictions in heritage towns). Proactive planning policies and objectives which

support the reuse and refurbishment of protected structures and older buildings of architectural, cultural, historic and aesthetic merit which, make a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the county should be included in the plan.

Proposed new policies, to be inserted in Section 9.9:

To support the adaptive re-use of heritage buildings for tourism and related services such as accommodation, museums which respects the historic character of the building and protects its integrity, subject to best architectural conservation practise and proper planning and sustainable development.

Proposals for the Draft Louth County Development Plan contd.

Encourage the reuse and refurbishment of vernacular buildings (houses or farm/ industrial buildings) in appropriate locations for tourist related facilities, including holiday home accommodation. The development shall relate in scale to the sites characteristics and location, shall not be detrimental to the rural amenity of the surrounding area and be in accordance development standards of this plan, particularly as they relate to the protection of the natural and built environment.

Chapter 11- Environment, Natural Resources & the Coast

Section 11.5.6:

We welcome the identification of Coastal Tourism as an important part of Louth's offering as outlined in Section 11.5.6 however it is suggested that the section could benefit by further identifying that tourism in coastal areas has the potential to enhance the destination offering in Louth.

A new objective to promote at local level the development of the Irish Sea Way as highlighted as a priority in the programme for Government should be included in the Development Plan.

Proposals for the Draft Louth County Development Plan contd.

Chapter 13- Development Management Standards

Fáilte Ireland welcomes the guidelines and standards as set out in section 13.13 relating to tourism development. Section 13.13.3 should make reference to relevant regulations Therefore we recommend that the following amendment be made.

Proposed additional text in Section 13.13.3 Caravan and Camping Site

Any proposed caravan and/or camping site should be in compliance with the 'Registration and Renewal of Registration Regulations for Short Term Tourism Accommodation Rental 2018'.

Commentary and Proposals on Policy Objectives in the Draft Plan

Relevant selected policy objectives for tourism are assessed as follows:

Policy / Objective	Comment
Chapter 2 Core Strategy	
SO7	Welcomed policy seeking to protect and enhance built, cultural and natural assets acknowledging the importance of these to tourists and visitors.
Chapter 5 Economy and Employment	
EE 55	This objective recognises the contribution of niche enterprises such as distilleries and breweries in supporting economic development and promoting tourism. As highlighted above Section 5.19 could benefit from an objective focusing on tourism, rural economies could greatly benefit from small scale enterprises which would allow diversification in the area. Promoting sustainable tourism can be a key contributor to the rural quality of life.
Chapter 6 Tourism	
TOU 1	Good objective encouraging collaboration with relevant stakeholders in the implementation of the Boyne Valley Tourism Strategy 2016- 2020, and any subsequent plans adopted.
TOU 8-11	Welcomed policies in relation to promotion of greenways and blueways with acknowledgement that these need to be development subject to compliance with relevant environmental directives.
TOU 12-13	Welcomed reference to Fáilte Ireland and commitment to work with the Agency
TOU 14	This objective which supports the development of the food and craft tourism sector, the promotion of food trails and the promotion a blended tourism experience model is welcomed as it will enhance the visitor experience and increase dwell time.
TOU 16	Good objective promoting festivals and sporting events to increase the cultural, heritage and lifestyle profile of the county.

Policy / Objective	Comment
TOU 20	This objective which promotes further in partnership with Fáilte Ireland and associated agencies themed around heritage, culture and an unspoilt natural environment is welcomed.
TOU 23	Welcomed policy in relation to Fáilte Ireland’s Initiative
New Objective in Section 6.4	To support and work with Fáilte Ireland on the development and implementation of Destination Experience Development Plans.
TOU 24	Welcomed policy in relation to Fáilte Ireland’s Initiative however minor wording amendment proposed: <i>To engage with Fáilte Ireland to deliver the implementation of the Ancient Destination Development Plan 2020 – 2024 within County Louth.</i>
TOU 26-28	Good objective encouraging direct tourism–based development to existing settlements where there is adequate infrastructure to service the development and encourages the re-use or diversification of an existing building.
TOU 29-33	Good range of objectives encouraging the provision of alternative accommodation facilities including glamping/camping accommodation, caravan parks, campervan facilities and hostels.
TOU 35	Good policy acknowledging the impacts tourism can have on the environment and infrastructure however minor wording amendment proposed: <i>To consider the potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations/along particular routes shall be considered and mitigated as appropriate. Such a consideration should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals. It is a policy of the Council to identify any deficits in existing infrastructure required for tourism development and to support upgrades where necessary.</i>
New Objectives in Section 6.3	<p>To facilitate, where appropriate, proposals to improve access for all at existing tourism sites and facilities, and to require all new tourism related developments to ensure the development is accessible to everyone, regardless of their age, or ability.</p> <p>It is an objective of the Council to support the provision of accessible tourism.</p> <p>To ensure all projects and improvements will adopt the principles of Universal Design</p>

Policy / Objective	Comment
	To undertake an Accessibility Audit within the lifetime of the Development plan to inform Accessible Tourism priority investments at key tourism hubs.
Chapter 7 - Movement	
MOV 19	This objective aims to support the 'Local Link' rural transport service and to encourage operators to improve the service to meet the social and economic needs of the rural communities in the County. We request the Council also references tourism within this Section. Developing transport links to rural tourism destinations will improve visitor's accessibility and assist in supporting the rural economy.
Chapter 8 –Natural Heritage, Biodiversity and Green Infrastructure	
NBG 53	We welcome the objective of securing EU funding mechanisms and national funding opportunities, including tourism related funding.
Chapter 9 – Built Heritage & Culture	
BHC 36-38	These objectives encourage protection of vernacular built heritage and the re-use and adaption of existing historic buildings in a manner compatible with their character. As detailed above we request specific reference to tourism in this regard. Sensitive adaptation of historic buildings can support their conservation
Chapter 11–Environment, Natural Resources and The Coast	
ENV 35	Welcomed objective supporting the development of appropriate and sustainable tourism development within forestry locations, while retaining adequate tree cover in the general area.
ENV 43	We welcome the inclusion of tourism as a consideration with regards to extractive developments and the need to protect the environment.
New Objective	A new objective to promote at local level the development of the Irish Sea Way as highlighted as a priority in the programme for Government should be included in the Development Plan.
ENV 60-64	Welcomed references to Sustainable Tourism as Louth's coastline is a major asset in terms of tourism.

Policy / Objective	Comment
Chapter 12 Climate Action	
TOU 21	We welcome inclusion of this objective which seeks best-practice environmental management and climate proofing of tourism related developments and activities to include the circular economy, energy efficiency, waste management, procurement and recycling.

Conclusion

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

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

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