Submission to Draft Longford County Development Plan 2021-2027

By Fáilte Ireland

Fáilte Ireland
National Tourism Development Authority

Ireland's Hidden HEARTLANDS

Introduction

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to the invitation for submissions on the Draft Longford County Development Plan 2021-2027 ('the Draft Plan') by Longford County Council ('The Council').

The Authority welcomes the opportunity to engage with Longford 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, we welcome the detail contained in the Draft Plan which includes numerous references to Tourism throughout the Plan and relating to a significant number of Chapters which recognises and supports the importance of tourism to Longford. The Council has responded to the suggestions of the Authority in many areas as raised in the 'Pre-Draft' Issues Paper submission and in particular we welcome the inclusion of a dedicated tourism chapter. However, the following may allow the County Council to complete the strategy.

The Objective of this Submission

Fáilte Ireland has prepared this submission to support and assist Longford 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 Longford County Development Plan**
  - Suggested Text Insertions
  - Additional Contextual Information

- **Commentary and Proposals on Policy Objectives in the Draft Plan**

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 Draft Plan has responded to many of the Authority's suggestions raised in response to the Issues Paper at Pre-Draft stage.

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

- **Chapter 1: Introduction and Strategic Context.** Chapter 1 sets out the context for the Draft Plan including its overall visions which is as follows:

  'to set out a framework for the sustainable physical development of the County, ensuring the conservation and protection of the built and natural environment, while providing in an equitable manner for all our people within the County'.

  While this vision intends to *'conserve and protect the built and natural environment',* it the does not reference tourism or those who visit the county. We request this vision also provides for those who visit the county as tourism contributes directly to the economy thereby improving many people's quality of life.

Commentary on the Draft Plan contd.

We welcome the reference to the Just Transition Report, the reference to '*implement the Strategic Initiatives of the Tourism Masterplan for the Shannon Navigation, particularly in relation to tourism actions for Discovery Zone 2: Mid-Shannon Lough Ree, peatlands & Shannon Callows'*, National Development Plan referenced projects including the proposed '*visitor resort project near Ballymahon, Longford, intended to create new tourism and visitor experiences in conjunction with bodies such as Fáilte Ireland and Waterways Ireland'* and the advancing plans in the Midlands '*to convert former Bord na Móna peat railways and trackways into cross-country walking, cycling and peatway routes, coupled with strengthening nearby towns and villages as hubs for tourism activity and local businesses'*.

These are key plans, policies and projects which will be critical in driving the county's tourism product offering into the future.

We welcomed the recent Government's announcement of €108million in funding for Bord na Móna's large-scale peatlands restoration project. This will provide opportunities to enhance tourism in the midlands and Fáilte Ireland will work with the relevant stakeholders to build on this and help maximise these opportunities in a sustainable manner.

- **Chapter 4: Core, Settlement and Housing Strategies.** Chapter 4 provides a detailed overview of the County's Core Strategy Vision, Settlement Hierarchy and Housing Requirements in turn relating to the policy hierarchy of the Eastern and Midlands RSES and the National Planning Framework. Tourism is generally referenced within this Chapter and is described as contributing to the economic assets of County Longford. This chapter sets out the hierarchy settlements and identifies Ballymahon as having particularly seen significant growth in tourism-orientated services such as food and drink, hostelries, and tourist accommodation which has coincided with the opening of the nearby Longford Forest Center Parcs resort in 2019.

Commentary on the Draft Plan contd.

- **Chapter 5: Transport, Infrastructure, Energy & Communications.** Chapter 5 provides an overview of the County's strategy in relation to transport, infrastructure, energy and communications. The Chapter sets out that the county has seen the development of greenway routes most notably the Longford Royal Canal Greenway section as well as more localised cycleways and walkways have also been developed. The plan identifies that the primary function of such routes relates to tourism and recreational value for the local population in addition to visitors, however, as well as forming the basis as key components of an overall cycling and walking network for the County. The Chapter identifies polices to build upon these successful cycling and walking routes and to promote the continued development of a more integrated and coherent cycling and walking network throughout the County and links this to Chapter 10 in respect of Tourism.

- **Chapter 6: Regeneration.** Chapter 6 identifies, in terms of strengthening rural towns, the significance of tourism to the economy. Section 6.64 sets out the importance of tourism and its links to Rural Enterprise and Regeneration and identifies a number of key tourism products in the county as well as green and blue infrastructure. Equally it identifies and supports the transition of peatland areas for other uses including tourism. Section 6.5.4.2 sets out projects that have been subject of RRDF funding including the Historic Granard Motte Project which is a collaboration with Fáilte Ireland. The chapter identifies the key towns and villages with existing and proposed tourism offerings.

- **Chapter 8: Economic Development.** Chapter 8, as outlined elsewhere in the CDP, again reiterates the importance of tourism to the economy and critically as a significant employment source. The tourism sector is identified as having upscaled significantly in recent years due to the opening of Center Parcs, regeneration projects, enhanced recreation and leisure trails and this activity has coincided with the Hidden Heartlands Branding promoted by Fáilte Ireland.

- **Chapter 9: Rural Economy.** Chapter 9 sets out the Rural Economic Development Strategy for the County. The Council recognises the importance of supporting sustainable sources of income and enterprises including the role of Tourism

Commentary on the Draft Plan contd.

as part of the Strategy. This includes supporting agricultural diversification into agri-businesses such as organic foods, rural tourism and small to medium sized enterprises. Section 9.3 specifically references sustainable tourism such as developing network of greenways, blueways and peatways, and associated trails and trackways.

- **Chapter 10: Tourism.** We welcome the inclusion of a dedicated tourism development chapter and reference to Fáilte Ireland's branding initiative Ireland's Hidden Heartlands. The Chapter references a wide range of policies and strategies which are existing and proposed in the Region. The aim of this section is to encourage and provide for the continued expansion of the tourism sector. This shall be achieved by the continued development and enhancements of visitor attractions and activities capitalising on our natural and cultural assets in a sustainable manner.

  We welcome the detail contained in this Chapter which contains references to Fáilte Ireland's brand initiatives and other strategic documents at national and regional level. The Chapter addresses key areas such as sustainable tourism and acknowledges tourism as an untapped resource which is strategically located in Ireland's Hidden Heartlands and well placed to exploit opportunities in *'slow and experiential tourism, offering both indoor and outdoor experiences.'*

  The subheadings in this chapter include:

  1. Aim
  2. Background
  3. Policy Context
  4. Policy Objectives
  5. Destination Towns
  6. Tourism Infrastructure and Visitor Services
  7. History, Heritage and Ancient Sites
  8. Lakes, Bogs and Waterways
  9. Greenways, Cycling and Walking
  10. Arts, Sport, Culture, Environment, Food and Festivals
  11. Tourism Climate Change Context and Associated Actions

Commentary on the Draft Plan contd.

- **Chapter 11: Built and Cultural Heritage.** This Chapter recognises our cultural heritage that gives the historic background to the rich built environment that underpins Longford's historical sense of identity.
  This Chapter contains limited reference to tourism.

- **Chapter 12: Natural Heritage and Environment.** This chapter to provides for the protection and enhancement of the natural heritage and the biodiversity of designated ecological sites within the County and to provide a wide range of environmental, social and economic benefits.

  This Chapter contains several important references to Tourism in relation to Non-Designated Sites, Inland Lakes, Waterways, peatlands.

Proposals for the Draft Longford 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.

Longford is well placed as a key part of Fáilte Ireland's brand initiative, Ireland's Hidden Heartlands to optimise the potential for tourism through proper planning and development. The consideration of natural and heritage resources, strategic planning for tourist 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 4 - Core Strategy

The inclusion of a reference to tourism in the Core Strategy (Section 4.6) would allow tourism considerations to feed into a county wide strategy. As referenced above we wish to see the inclusion of tourism incorporated into the County's Vision. Inclusion within both the Core Strategy and the Vision, would help coordinate the County strategy.

Section 10.2 sets out the aim of the Longford Tourism Strategy 2017-2022 which is *'to encourage and provide for the continued expansion of the tourism sector'*. This wording could be used in Section 4.6 as the basis for an additional aim, thus improving the coordination of tourism aims at a strategic level in the plan.

Proposals for the Draft Longford County Development Plan contd.

Proposed new policy, to be inserted in Section 4.6:
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 7- Placemaking

Section 7.4.2.1 identifies that towns and villages are important attractions in themselves and should be referenced in relation to tourism benefits particularly that high quality and attractive towns and villages 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.

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.

Overseas visitors are accustomed to visiting well-maintained and preserved, attractively presented and historically interesting towns in their own and other countries. They expect to find similar experiences in Ireland - places that are distinctive in terms of character, architecture, public realm and green spaces as well as having vibrant centres. They hope to enjoy our towns and villages by exploring on foot, absorbing the atmosphere, sitting and watching the world go by,

Proposals for the Draft Longford County Development Plan contd.

learning about our unique culture and history and participating in some of what they enjoy doing during leisure time including eating good food, sharing good company, shopping and attending live performances.

Therefore, the planning and delivery of projects must be multi-faceted and facilitate tourism infrastructure and projects in equal measure. Quality urban design and architecture should facilitate vibrancy and animation throughout the day and night, and this can be achieved through creative design and multi-functional use within buildings and public spaces which encourage a broader mix of uses. This will increase a destination's ability to maximise the economic benefits of across multiple sectors including tourism.

Chapter 10 – Tourism

Chapter 10 contains a good range of tourism objectives to support the tourism sector and stakeholders in the county. Many of Fáilte Ireland's comments included within their pre-draft submission have been addressed in the Draft Plan however, the following amendments would ensure the Chapter provided a more complete strategy for County Longford.

Tourism Maps

We welcome the inclusion of a range of maps within Appendix 5 relating to tourism considerations such as cycling and walking routes, waterways, historic sites, areas of natural amenity. However, we request a single simplified map be included within Chapter 10 itself to provide ease of reference and to better illustrate the tourism strategy for the county in map form.

Proposals for the Draft Longford County Development Plan contd.

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 Hidden Heartlands.

Accessible Tourism

In order to improve the experience of those who live and visit Longford, 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. While the Draft Plan does refer to enhanced accessibility of its town centres (for example objective CPO 6.70), we consider that a direct reference to tourism in this context is appropriate.

Proposals for the Draft Longford County Development Plan contd.

Longford could benefit from having a one stop shop for information on Accessibility as a tourism destination on either visitlongford.ie or the Local Authority website, providing an easily accessible Accessibility Guide for visitors.

It is considered that a section on Accessible Tourism be inserted into Section 7.4.2.2 'Universal Design' or Chapter 10.

Proposed new policies, to be inserted in Chapter 10:
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.

Destination Experience Development Plans
We welcome discussion of the Fáilte Ireland strategies and initiatives throughout the draft Plan however in order to future proof the Development Plan further develop the visitor experience it may be beneficial to encourage the development of Destination Experience Development Plans.

Proposals for the Draft Longford County Development Plan contd.

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.

The development of Destination Experience Development Plans can provide a comprehensive and holistic response to ensuring Longford 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 Hidden Heartlands. 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.

Reference to Eco Tourism

In a number of places, the Draft Development Plan makes reference to 'Eco-Tourism' it is submitted that Ecotourism is a niche segment of tourism in natural areas where as a more accurate reference would be to 'Sustainable Tourism' which does not refer to a specific type of tourism, it is an aspiration for the impacts of all forms of tourism. All forms of tourism should be sustainable.

We recommend that Section 10.5.2 be reworded and that references to 'Eco-Tourism' be replaced with 'Sustainable Tourism' where relevant.

Proposals for the Draft Longford County Development Plan contd.

Chapter 11 – Built and Cultural Heritage

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 Chapter 11:

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.

Commentary and Proposals on Policy Objectives in the Draft Plan:

The relevant policy objectives for Tourism are assessed as follows:

Policy / Objective	Comment
Chapter 4: Core Strategy	
New Policy	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: Transport, Infrastructure, Energy & Communications	
CPO 5.6	Good objective which aims to integrate the County's transport and tourism strategies to promote increasingly sustainable travel patterns and improved linkages between the towns and villages within the County.
CPO 5.51	Good objective which aims to support and promote the heritage value of the rail network and the retention and enhancement of disused rail lines with uses to provide for tourism, amenity and sustainable transports uses such as cycleways and walkways.
Chapter 6: Regeneration	
CPO6.18	Good objective which aims to support the development of projects which support community led themes of Local Action Plans, in terms of digital connectivity, enterprise creation opportunities, public realm and environment, tourism infrastructure, promotion and marketing.
Chapter 8: Economic Development.	
CPO 8.20	We welcome the objective to promote the development of high-quality tourism, leisure and complementary activities as this supports further tourism product development.
CPO 8.27	We welcome specific identification and support for the development of a cross sectoral approach to promote Longford as a key tourism hub in the Midlands, building on Fáilte Ireland's Hidden Heartlands brand and the Shannon Tourism Masterplan.
CPO 8.38	Support the development of tourism and heritage-based enterprises in Granard which complement the natural and cultural heritage value of the town, in particular the Motte and Bailey site.

Policy / Objective	Comment
CPO 8.77	We welcome this objective which promotes the development of 'Smart Villages' to develop and diversify the rural economy to build on local enterprise and infrastructure assets to drive innovations around energy, transport, agri-food, tourism, e-service and, remote working. This may allow individuals to visit and stay longer in the County.
CPO 8.74	This section relates specifically to tourism, it places suitable importance on the contribution tourism to the local economy which is welcomed.
CPO 8.78	We welcome the emphasis placed on tourism as an integral part of County Longford's economic profile including the key strategic locations and promoting access to tourist sites and attractions.
CPO 8.79	We welcome inclusion of this objective which aims to promote the development of sustainable tourism as part of the economy, recognising the importance of 'landscapes, cultural heritage, environment and linguistic heritage'.
Chapter 9: Rural Economy	
CPO 9.14	We welcome this objective which supports agricultural diversification such as organic foods, rural tourism and small to medium sized enterprises.
CPO 9.15	This objective supports the rural economy and initiatives in relation to diversification, agribusiness, rural tourism and renewable energy which can assist in sustaining employment opportunities in rural areas.
CPO 9.19	Objective CPO 9.19 supports the conversion of redundant farm buildings of vernacular importance for appropriate owner-run enterprises, such as agri-tourism which can contribute to tourism offering in more rural locations.
CPO 9.30	This objective supports the development of appropriate and sustainable tourism development within forestry locations which ensures continued use of these assets.
Chapter 10 Tourism	
CPO10.1	Additional text to be included: As part of that process Longford County Council will liaise with Fáilte Ireland as required on the development of its strategy, as well as any smaller scale plans or programmes that are prepared to give effect to that strategy. The Council will consult with the Authority on assessment of any such plans, programmes or policies to ensure that they are adequately screened or assessed in full compliance with Directives including the SEA Directive and the Habitats Directive."
CPO 10.14	Amendment to draft policy: Replace the word Eco Tourism with Sustainable Tourism

Policy / Objective	Comment
CPO 10.30	Amendment to draft policy: Suggest Rewording policy objective to ensure that the Local Authority should exhaust all options of voluntary agreements before considering moving to CPO
CPO10.71	Additional text to be added: 'Support the setting up of a 'Green Festival', Walking Festival and a 'National Cycling Festival' initiative'.
New Policy	To support the future development of Destination Experience Development Plans which may be developed by Fáilte Ireland during the lifetime of this development plan and to ensure continued collaboration and alignment with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these DEDP's
New Polices	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.
Chapter 11: Built and Cultural Heritage	
New Policy	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.

Policy / Objective	Comment
Chapter 12: Natural Heritage and Environment	
CPO12.31	We welcome this objective aims to build on existing amenity, in particular the development and upgrading of the Inland Waterways including key stakeholder. Also highlighting an inter-regional approach shall also be taken with Leitrim, Roscommon, Westmeath and Offaly to develop the North Shannon Tourism area.
Chapter 16 Development Management Standards	
16.4.20 Tourism and Recreation	We welcome this objective which promotes and encourages sustainable forms of tourism, niche tourism and recreation in the countryside, in appropriate locations; and recognises that certain facilities may be required in order to enhance, grow and develop the tourism product and offer.

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 see separate page for contact details as requested in complying with the provisions of the Data Protection Act, as submissions are legally required to be published online.