

# IRISH HOTELS FEDERATION

SUBMISSION TO THE

DUBLIN CITY COUNCIL

ON THE

DUBLIN CITY DEVELOPMENT

PLAN 2022 – 2028



FEBRUARY 14<sup>TH</sup> 2022

## INTRODUCTION

The Irish Hotels Federation (IHF) welcomes the opportunity to engage with Dublin City Council on the preparation of the Dublin City Development Plan 2022-2028.

The IHF, founded in 1937, is the national representative organisation of the hotel and guesthouse sector in Ireland, representing the interests of 970 businesses including 178 hotels and guesthouses across Dublin City and County with approximately 21,000 guestrooms. As a key stakeholder in Irish tourism, we work with our industry partners to ensure the right conditions are in place for tourism to grow and prosper, thereby contributing to recovery and job creation in the economy.

Tourism is one of Ireland's largest indigenous industries and is essential for Ireland's economic well-being. In 2019, out-of-state (overseas and Northern Ireland) tourist expenditure amounted to €5.6 billion nationally. With a further €1.8 billion spent by overseas visitors on fares to Irish carriers, foreign exchange earnings were €7.4 billion. Domestic tourism expenditure amounted to €2.1 billion, making tourism a €9.5 billion industry. In this regard, it is important to note that out-of-state tourist expenditure is in effect export earnings, and so represents a net incremental economic gain to the Irish economy. This is new money coming into the Irish economy. Tourism is therefore an important component within the export sector of the Irish economy.

In 2019, some 9.7 million overseas visitors came to Ireland. Of that number, 6.6 million visited Dublin and spent €2.2 billion in the city. That represented approximately 40% of total "out-of-state" visitor spending in Ireland as a whole. Tourism therefore makes a very significant footprint within the Dublin economy. Tourism is also a hugely significant source of employment in Dublin, supporting over 75,000 livelihoods.

We believe that Dublin can continue to develop as an international destination of choice for many visitors seeking our world-famous hospitality and for businesses looking to invest in a globally competitive environment. Recently, Lonely Planet ranked Dublin 7th out of the top ten cities to visit in 2022, positively referencing the city's pedestrianisation plans. Dublin must continue to be seen as an attractive and welcoming location for leisure tourists as well as conferences and events.

The Dublin City Development Plan has a key role in developing Dublin's tourism economy. As such we believe a highly targeted and well-resourced tourism strategy is required to ensure Dublin lives up to its full potential as an international visitor destination. We outline below a number of key policy priorities to help achieve this vision.

## **Policy proposals for long-term sustainable development of Dublin City as an attractive visitor and tourism destination:**

The Dublin City Development Plan has a major role in supporting the development of a strong resilient tourism economy for the city. Not only will this have enormous benefits for the City, but it will have knock-on benefits for the rest of the country given the City's vital role as a gateway for in-bound tourism into Ireland. We propose the following priorities:

### **1. Place to visit / visitor experience**

Measures to support an enhanced overall visitor experience, attract a greater mix of higher spending visitors and lengthen their stay:

- a renewed focus on investment in 'things to see and do'
- investing in the City's public realm, green spaces and outdoor areas
- greater investment in public transportation, roads and traffic management
- greater provision of public toilets
- greater investment in policing, enforcement of bye-laws and a targeted strategy for dealing with anti-social behaviour based on measurable results

### **2. Place to live and work**

- One the biggest factors impact on Dublin's attractiveness as a city in which to live and work is the ready availability of affordable housing within a short commute from places of work.
- This will require a greater of focus on higher density development including increasing in height for apartment developments.

### **3. Place to invest**

- Dublin's shortage of housing also directly impacts on the City's attractiveness as a place to invest – it is one of the biggest domestic drivers of competitiveness pressures within Dublin. The cost of accommodation is a key factor in the decision to come to, or to remain in, Dublin.

### **4. Conferences & events**

A vital and growing element of the Dublin tourism economy is its capacity to perform strongly in the important business tourism market (MICE – Meetings, Incentives, Conferences, and Events). The Development Plan should have regard to this growing economic opportunity in terms of facilitating and attracting a greater number of conferences and events to the City each year.

**5. Improving visitor navigation around the city** - there is a direct correlation between visitor satisfaction levels and the availability of an efficient transportation infrastructure for the city and wider region and its connectivity with the rest of the country:

- **Public transport** –
  - Greater investment in a more efficient and reliable **integrated public transportation** system is essential to sustain and develop Dublin’s tourism industry and economy.
  - Improved public transport infrastructure connecting **Dublin Airport** with the City is required in line with the Government’s national policy objective to increase air capacity and air-connectivity into Dublin.
  - Wide availability of reliable public transport is absolutely key for **people working** in hotels and wider hospitality industry, particularly in early and late hours.
  - Further delays to the **Metrolink** project must be avoided. It should be seen as a vital infrastructural priority for Dublin as a vibrant European capital city.
  
- **Road infrastructure** - Enhanced capital investment in road infrastructure must be central to the transport plan, including appropriate access for visitors to the city not using public transport.
  
- **Taxis** - Greater opportunities for taxis to play stronger role as an intrinsic part of Dublin’s public transport infrastructure – this is of major importance for tourism activity and access.
  
- **Cycling** - the Dublin Bikes scheme has been a great success, but over the course of this plan (2022-2028) a start could be made to introduce the next phase of leisure cycling in the city. This would involve the further investment in dedicated cycle trails around the city core and into districts outside the D1 and D2 city centre.

**6. Developing the evening and night-time economy** - the evening and night-time economy contributes significantly to the recreational life of the city – cultural, entertainment and hospitality employment. The new Development Plan should address the following:

- requirement for extended public transport, including bus and rail services
- rethinking the use of public spaces and reimagine under-utilised spaces
- connecting to creative and cultural strategies, greater use of heritage assets
- reviewing the City’s urban design policy to incorporate the needs of the night-time economy into the plan-making process
- extending opening hours
- integrated strategy to support outdoor event spaces

- 7. Residential short-term lettings** – Robust enforcement by Dublin City Council of regulations around the use of residential properties for short term lettings must be essential component of the City's strategy for ensuring the sustainable development of Dublin's tourism economy. This is of vital importance to both residents in the city, who face significant accommodation pressures as well rate-paying tourism accommodation businesses operating in the market, where a level playing field is critical.
- 8. Student Accommodation used as tourism accommodation** - The mix of accommodation available in Dublin City has a significant impact on the economic sustainability of the hotel and guesthouse sector. The viability and long-term sustainability of the sector would be seriously undermined by any influx of additional student accommodation capacity for use as tourist / visitor accommodation.
- Such a scenario, including change of use of existing developments, risks destabilising the sector by creating an environment of unfair competition given the particular characteristics of student accommodation.
  - The local authority should safeguard the existing hotel sector by ensuring that it makes decisions in a way which will not have a negative impact on the existing businesses in the sector. Any additional influx of such use of student accommodation capacity would have a destabilising impact on existing businesses and should require an impact assessment.
  - It is recommended that all new Student Accommodation developments be subject to an assessment of need and all applications should be accompanied by a hotel impact assessment.
- 9. Creating new visitor hubs outside the city core**
- **Kilmainham** - recent initiatives such as the proposed refurbishment of Kilmainham Mill as a visitor attraction is an illustration of this and shows how a new heritage quarter could be developed in Dublin 8. This would involve bringing together existing attractions such as Kilmainham Gaol, Kilmainham Courthouse, IMMA, the War Memorial Garden, and Richmond Barracks and promoting them as an integrated and joined-up heritage quarter.
  - **Docklands** - the Plan should include a focus on initiatives for placemaking in the Docklands as a new dimension to the Dublin's visitor offering. As such, an important role exists for the City Council to lead the other principle state bodies in developing the city's maritime resources.
- 10. Spreading visitor numbers across the year** by promoting festivals and events outside the core June, July, August season. Whereas this might be challenging for traditional rural tourism destinations, it should be readily achievable for a year-round city destination such as Dublin.