

The Draft Kildare County Development Plan,
C/O The Administrative Officer,
Forward Planning,
Áras Chill Dara,
Devoy Park,
Naas,
Co. Kildare.
W91 X77F

23rd May 2022
[Online Submission]

Dear Sir/Madam

RE: SUBMISSION TO KILDARE COUNTY COUNCIL DRAFT DEVELOPMENT PLAN 2023-2029 – ON BEHALF OF CLIFF AT LYONS UNLIMITED COMPANY IN RELATION TO CLIFF AT LYONS HOTEL, LYONS ROAD, ARDCLOUGH, CO. KILDARE.

1.0 INTRODUCTION

Cliff at Lyons Unlimited Company¹ have retained Tom Phillips + Associates² (Town Planning Consultants), to prepare this submission in relation to the proposed *Draft Kildare County Council Development Plan 2023-2029*, currently out for public consultation. The submission relates to lands at Lyons Road, Ardclough, Co. Kildare, as outlined in Figure 1.0

This *Development Plan Submission* has been drafted to highlight the following requests;

1. It has come to the attention of the Cliff at Lyons Hotel that a portion of lands in control of the Hotel are not included within the Rural Settlement Boundary for Ardclough, as per the Ardclough Rural Settlement Map of the *Draft Kildare County Council Development Plan 2023-2029*. It is requested that these lands (which form part of the overall landholding of the Cliff at Lyons Hotel) are included within the Rural Settlement Boundary as part of the Material Alterations to the *Draft Kildare County Council Development Plan 2023-2029*. Our Client considers that this will provide a more sensible and coherent boundary, which is cognisant of the existing use of the Cliff at Lyons Hotel, as well as the remainder of the landholding. Consideration of the wider settlement boundary pattern from a spatial planning perspective to potentially allow for sustainable expansion of the hotel is also to be considered.

¹ Cliff at Lyons Hotel, Lyons Road, Kearneystown Upper, Co. Kildare

² 80 Harcourt Street, Dublin 2, D02 F449



2. Enhance the provision of supportive tourism policy in the Draft Plan, that ensures the important role of luxury tourist accommodation, such as the Cliff at Lyons, is inherently supported in the Plan, once adopted. The inclusion of specific text to support future development of the Cliff at Lyons Hotel is requested.

Cliff at Lyons is a luxury destination occupying an unusual collection of historic rose-clad buildings, including a mill and former dovecot, in Ardclough. Importantly the property is a c. 30-minute drive from Dublin. Acquired by Cliff in early 2016, the property delivers an Irish country experience to complement the Cliff House Hotel at Ardmore. The Georgian buildings, built of granite and slate, have been comprehensively restored into contemporary rooms and suites, as well as more traditionally decorated family-friendly two- and three-bedroom cottages. The Hotel delivers a comprehensive food offering, from high-end Michelin star experience to their pantry offering enjoyed by over 1,100 of local customers per week. Cliff at Lyons currently attracts over 12,000 resident visitors per annum to the locality, while employing over 131 on the property the whole year around.

It is clear that the Cliff at Lyons is a significant local employer and tourist location within both the Ardclough area but also the wider County. It is essential that this is supported further in the Plan, to allow the orderly expansion of the site, should this be required by Cliff At Lyons United Company.

1.1 Purpose of this Submission

Our Client welcomes the continued support outlined in the *Draft Kildare County Council Development Plan 2023-2029* for tourism and tourist-based industry throughout the county, particularly boutique and special character hotels, which is a category that the Cliff at Lyons Hotel falls under.

As outlined above, the primary purpose of this submission is to draw attention to the discrepancy of the current Rural Settlement Boundary in acknowledging the existing landholding of the Cliff at Lyons Hotel, and to request that the boundary is altered to acknowledge the ownership correctly. Ensuring that this boundary is correct in this sense will allow tourism policies of the Draft Development Plan to be appropriately applied and adhered to, thus allowing for the orderly expansion of operations at the grounds. This in turn will assist the Hotel to further establish itself as the exemplar of special character hotels in Kildare County.

It is formally requested that the lands at Lyons Road, Ardclough, as indicated in Figure 1.0 and described within this submission, are included within the Rural Settlement Boundary of Ardclough, as part of the Material Alterations to the *Draft Kildare County Council Development Plan 2023-2029*, to reflect the true landholding of the Cliff at Lyons Hotel.

It is also requested that consideration is given to the form of the Rural Settlement Boundary of Ardclough, as currently proposed, and whether it should also be extended to the south and southwest of the Cliff at Lyons landholding. This reflects the intention of the possibly expanding Hotel operations over the life of the *Draft Kildare County Council Development Plan 2023-2029*.

This spatial planning consideration is in line with good planning practice and recognises the nature of the existing settlement development, as well as the sensible, sustainable pattern in which the settlement could expand. We note much of Ardclough, as it exists, has been omitted from the settlement boundary, in its current form.

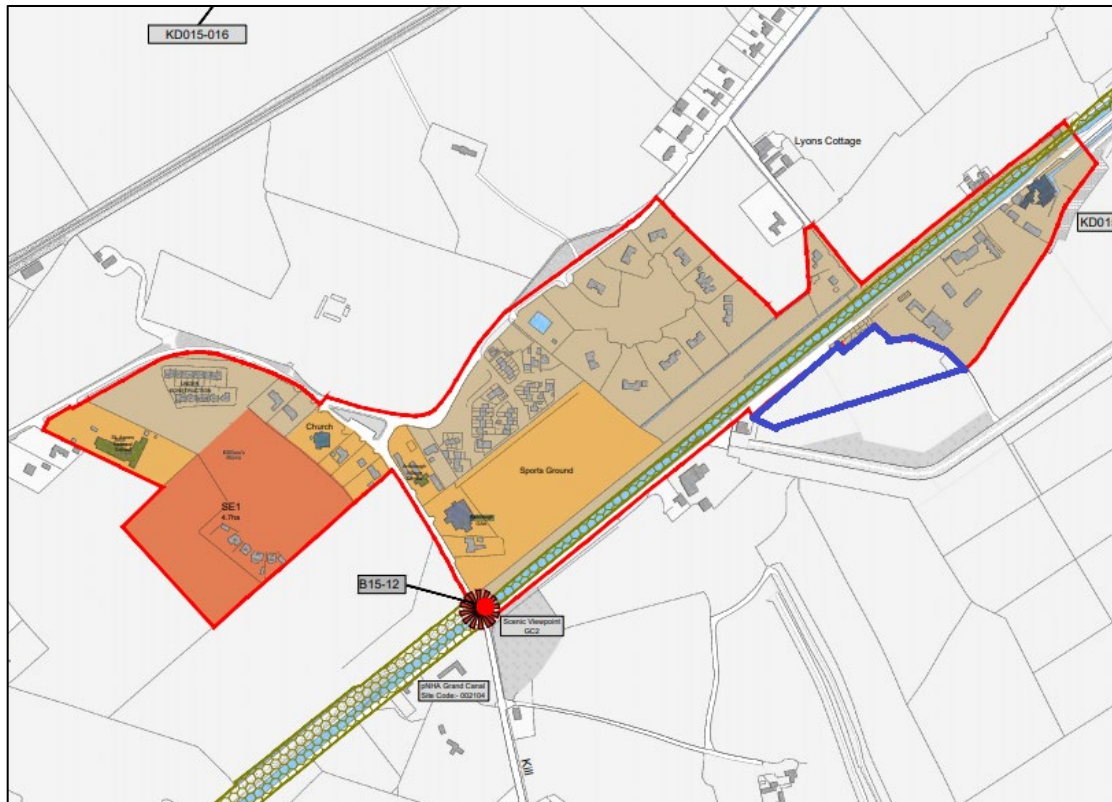


Figure 1.0 – Indicative Requested Rural Boundary change to reflect Cliff at Lyons Hotel landholding (blue outline) (Source: *Draft Kildare County Council Development Plan 2023-2029*, cropped and annotated by Tom Phillips + Associates 2022.

2.0 SITE LOCATION AND CONTEXT

The subject lands are located adjacent to the Grand Canal (which runs along the north-western boundary of the site) at the Cliff at Lyons Hotel, Ardclough, Co. Kildare, c. 4.5 km south of Celbridge, c. 14 km east of Clane, and c. 17.5 km north-east of Naas.

Ardclough Village is defined as a rural settlement, as per the *Draft Kildare County Council Development Plan 2023-2029*. As noted above, the Grand Canal runs through Ardclough and separates the Cliff at Lyons Hotel from the village centre to the southwest. Ardclough is a small-scale village, comprising mostly of residential uses (with housing estates such as Lishandra Manor and Wheatfield Upper) with some varied commercial, retail, and community uses in the village also, such as a grocery shop, coach hire business, and St. Anne's National School. The UCD Cliff Farm facility lies c. 3 km to the east of the site.

The area surrounding the subject lands is characterised by a mix of uses, the principal of which is agriculture. However, as the lands adjoining the subject site form the Cliff at Lyons Hotel lands, the remaining lands to the north are characterised under tourism/commercial uses. The subject site is an underutilised greenfield site, which lies south of the Grand Canal. An access road enters the subject lands from the east.



Figure 2.0 – Indicative Cliff at Lyons Hotel landholdings not recognised by current Rural Settlement Boundary, requested to be included within the boundary as part of the Material Alterations to the *Draft Kildare County Council Development Plan 2023-2029* (indicatively marked with blue). Source: Google Earth annotated by TPA 2022.



Figure 3.0 - Indicative Cliff at Lyons Hotel landholding indicated in red, inclusive of lands not recognised by current Rural Settlement Boundary, requested to be included within the boundary as part of the Material Alterations to the *Draft Kildare County Council Development Plan 2023-2029* (indicatively marked with red outline). In particular, the lands to the south west of the hotel should be noted. Source: Google Earth annotated by TPA 2022.



3.0 POLICY CONTEXT

3.1 *National Planning Framework*

The *National Planning Framework* (NPF), published in February 2018, sets out a strategic development framework for the Country to 2040. The *National Planning Framework* is the Government's plan to cater for the extra one million people that will be living in Ireland, the additional two thirds of a million people working in Ireland and the half a million extra homes needed in Ireland by 2040.

Meeting the goals and objectives of this plan is essential to ensure the future which is envisioned for Ireland materialises in the desired manner. Meeting the Objectives of the NPF is therefore crucial.

The Framework focuses on:

- Growing regions, their cities, towns and villages and rural fabric.
- Building more accessible urban centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment and delivery.

As a strategic development framework, the Plan sets the long-term context for Ireland's physical development and associated progress in economic, social and environmental terms and in an island, European and global context. Ireland 2040 will be followed and underpinned by supporting policies and actions at sectoral, regional and local levels.

Tourism and tourism activities are acknowledged as key economic contributors for the State, and this is especially important in the context of rural areas in the country, where such activity can provide significant employment for areas which may otherwise not have an abundance of employment opportunities. The following policies are considered to be relevant to this submission

National Policy Objective 6 - *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.* [Our emphasis]

National Policy Objective 11 - *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.* [Our emphasis]

National Policy Objective 17 - *Enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive use now and for future generations.* [Our emphasis]

National Policy Objective 22 - *Facilitate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.* [Our emphasis]



As noted above, National Policy Objectives in relation to employment and tourism promotion largely support future expansion of the settlement boundary in this instance, as they assist in ensuring these objectives are implemented at a local level.

3.2 **Regional Spatial and Economic Strategy for the Eastern and Midlands Region**

The *Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031* (RSES) is a strategic plan and investment framework to shape future development and to better manage regional planning and economic development throughout the Eastern & Midland Region. The RSES is an essential document which critically feeds into the NPF. Much of the content of the RSES is mirrored by the NPF. The objectives of the RSES represent high level objectives for the region.

One of the growth enablers for this region is to;

“Support rural areas by harnessing natural resources to develop renewables, recreation and tourism opportunities including green infrastructure planning and the development of an integrated network of greenways, blueways and peatways”.

The following Regional Policy Objectives (RPO) are relevant to tourism and tourism-based industry and would support the intensification/expansion of the Cliff at Lyons Hotel, thus making them relevant to this submission.

Rural Areas - RPO 4.79: *Local authorities shall identify and provide policies that recognise the contribution that small towns, villages and rural areas contribute to social and economic wellbeing. As part of this policy provision that seeks to support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, to protect the value and character of open countryside and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, renewable energy, tourism and forestry enterprise is supported. [Our emphasis]*

Rural Areas - RPO 4.84: *Support the rural economy and initiatives in relation to diversification, agri business, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas. In keeping with the NPF, the Eastern and Midland Regional Assembly will support the longer term strategic planning for industrial peatland areas. This may include support, where appropriate, for a Transition Team in place and preparation of a comprehensive afteruse framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction. [Our emphasis]*

Rural Economy - RPO 6.8: *To support the sustainable development of tourism in the Region in line with the strategic objectives of both Ireland’s Ancient East and Ireland’s Hidden Heartlands experience brand propositions. [Our emphasis]*

Arts, Culture, Language and Heritage - RPO 9.24: *Promote and facilitate the role of arts and culture in recognition of its importance to people’s identity and the potential for economic development through a unique cultural tourism offering throughout the Region. [Our emphasis]*



As per the policy objectives in the NPF, these regional objectives support the future expansion of the settlement boundary in this instance, as they assist in ensuring these policy objectives are implemented at a local level.

3.3 **Draft Kildare County Council Development Plan 2023-2029**

It is noted that there are a significant number of objectives and policies within the *Draft Development Plan* which support tourism and tourist-based industry. The *Draft Development Plan* also recognises the importance of tourism, particularly in the context of the rural economy, as tourist-based industry can provide significant employment in rural areas where employment opportunities may not otherwise be in abundance.

The following sections and objectives from the *Draft Development Plan* are noted as being relevant to this submission, and outline support for tourism and tourism-based industry. These align with the requests in this submission.

Section 4.21

*“Tourism and recreation make a positive contribution to the economic and social wellbeing of the county. **Kildare’s close proximity to Dublin offers significant opportunities to expand the existing tourism offer and brand for the county.** Kildare’s location, its rich built and natural heritage along with its horse racing and golfing attractions provide opportunities to attract spin-off tourism from the city region and neighbouring counties.*

*Kildare’s tourist attractions are therefore important assets for the development of the county and are fundamental to the enjoyment by both visitors and residents. The important contribution that the community and the vast numbers of volunteers throughout the county make to the enhancement of Kildare as a place to visit is widely acknowledged and recognised. **The key focus for the Midlands/Mid-East Fáilte Ireland region (in which Kildare is located) will be the further development and promotion of the local culture and heritage product.**” [Our emphasis]*

Section 4.21.1

*“Tourism is an important sector of Kildare’s economy and prior to Covid 19 had grown substantially over the previous number of years. Because of its proximity to the Dublin tourism hub, the tourism sector requires a particular strategic approach for success. **This includes an emphasis on boutique and special character hotels offering an ‘accommodation plus’ product (e.g. leisure, recreation, outdoor pursuits, heritage and selected sports).**” [Our emphasis]*

RE P15: “Support, promote, protect, improve, encourage and facilitate the development of tourism throughout the county as an important contributor to job creation in accordance with the proper planning and sustainable development of the area.” [Our emphasis]

RE O94: “Identify strategic sites capable of accommodating new tourism ventures while also ensuring the preservation of the natural landscape of the area having regard to economic, environmental and social sustainability considerations.”



RE O101: *“Promote and facilitate the development of rural tourism inter alia open farms, on-farm craft villages and visitor centres and the reuse and refurbishment of vernacular buildings (houses or farm/industrial buildings) for tourist related facilities, including holiday home accommodation; subject to compliance with both the Rural Housing Policies and Development Management Standards of this Plan. It is important that such development does not have a detrimental impact on the residential amenities of rural residents.”*

RE O102: *“Encourage the clustering of tourism enterprise in town and village centres in the interest of sustainable tourism development and the enhancement of the public realms of town and village centres to maximise their tourism potential. In all cases, applicants must submit a robust assessment setting out the sustainability of any proposal with respect to economic, environmental and social sustainability.”*

RD O2: *“Facilitate agriculture, horticulture, forestry, tourism, energy production and rural resource-based enterprise within the rural settlements and in appropriate rural locations subject to relevant development management standards.”*

When assessing how similar developments are treated in other Local Authority areas, we note specific provisions of the *Kilkenny City and County Council Development Plan 2021-2027* in relation to Mount Juliet Estate in Thomastown, which support the continued sustainable development of the Estate. This is to ensure its continued recognition as a local, national, and internationally prominent tourist destination. It is considered that a number of the objectives for Mount Juliet Estate may be adopted in a similar manner in the *Kildare County Council Development Plan 2023-2029* in the context of the Cliff at Lyons Hotel. More specifically, we note the following text from Section 5.3.2 of the *Kilkenny City and County Council Development Plan 2021-2027*;

“...facilitate appropriate development in a manner which respects the sensitive nature of the landscape, heritage and environmental attributes of the estate and seeks to ensure their protection and enhancement...”

Similarities between both locations are evident, and a specific objective for the Cliff at Lyons Hotel would be welcomed. The natural and architectural heritage of the Cliff at Lyons Hotel draws parallels with Mount Juliet Estate, and the importance of the Cliff at Lyons Hotel as a local employer and a national and international tourist destination should be explicitly recognised as part of the *Kildare County Council Development Plan 2023-2029*. This will ensure the Hotel can continue to develop in a sustainable manner and can continue to support local employment, while also exemplifying Ardcrough and the wider area as an attractive and desirable area with a special character tourist accommodation offering. Ensuring this objective would allow for a well-considered expansion of the settlement from a spatial planning perspective. A suggested wording for specific text to be included in the forthcoming *Kildare County Council Development Plan 2023-2029* is as follows;

“Provide for the development of the Cliff at Lyons Hotel current and future landholdings subject to the capacity of the lands to absorb development without detracting from the lands built and natural heritage context. ”

This text, or similar text, would be welcomed within the forthcoming *Kildare County Council Development Plan 2023-2029*.

The facilitation of tourism and economic development, particularly in rural locations, is of national importance. The alteration of the Rural Settlement Boundary of Ardclough is necessary to correctly represent the landholding of Cliff at Lyons Hotel, thus facilitating any further expansion by the Cliff at Lyons Hotel. Development at this location will draw visitors to the location, while allowing for a sustainable population and employment growth in the vicinity.

Cliff at Lyons Hotel offers a unique accommodation experience due to the level of protected structures on site, which have been appropriately and sustainably reused and refurbished. As such, not only does the Cliff at Lyons Hotel offer luxury accommodation but offers a unique cultural tourism experience also.

The alteration of the Rural Settlement Boundary to reflect the landholding of the Cliff at Lyons Hotel will in turn assist the Local Authority in meeting the policies of the *Draft Kildare County Council Development Plan 2023-2029*, as well as the relevant national and rural policy objectives outlined in Section 3.0 above.

4.0 SUBMISSION ON KILDARE COUNTY DRAFT KILDARE COUNTY COUNCIL DEVELOPMENT PLAN 2023-2029

4.1 *Alteration of Rural Settlement Boundary of Ardclough to reflect the true landholding of the Cliff at Lyons Hotel*

Our Client considers that the Cliff at Lyons Hotel represents a special character hotel which offers an ‘accommodation plus’ product. In this instance, the architectural heritage of structures in the landholding of the Cliff at Lyons Hotel, as well as the natural heritage of the Grand Canal and the greenway which runs along the Canal offers a unique and special experience for patrons of the Cliff at Lyons Hotel. Figure 4.0 below shows the Kildare Tourism Map, which recognises the heritage of Ardclough, and also shows the greenway, which runs along the Grand Canal.

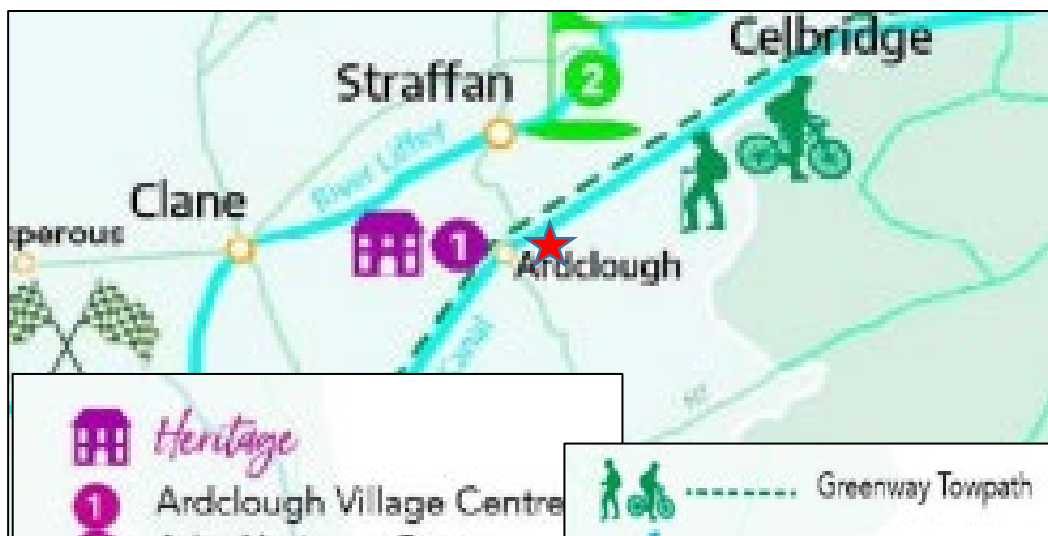


Figure 4.0: Extract of Kildare Tourism Map, which shows the built and natural heritage offerings of Ardclough and the Cliff at Lyons Hotel with subject site indicatively marked with red star. (Source: *Draft Kildare County Council Development Plan 2023-2029*. Cropped by Tom Phillips + Associates 2022).



It is considered that the alteration of the Rural Settlement Boundary to reflect the true landholding of the Cliff at Lyons Hotel will allow for the continued operation of the hotel in such a manner that allows the relevant tourism policies in Section 3 above to be implemented in full, thus showcasing the ‘accommodation plus’ offering available in Kildare.

Failure to acknowledge the landholding of the Cliff at Lyons Hotel would restrict the existing operations of the hotel, while also potentially interfere with any future expansion plans of the hotel. It is clear by recognising the boundary it would remove the potential restriction on the ability of the hotel to meet the aims of the relevant policies outlined in Section 3.0.

We note the following in relation to village and rural settlements as per the *Kildare County Council Development Plan 2023-2029*;

“New development, which reinforces the settlement core as the service centre and enhances its character as the centre of the settlement, will be encouraged”.

We consider that further development of the Cliff at Lyons Hotel would reinforce the settlement core as a service and employment centre, particularly due to the unique and special character offering of the Hotel. The inclusion of specific text/ specific objectives which explicitly reference the Cliff at Lyons Hotel as a central and vital asset to Ardclough and surrounding area is also requested. Recognition of the importance of the Hotel as a central economic driver for the area is important to allow for the sustainable expansion and development of the Cliff at Lyons Hotel and the wider settlement.

We therefore formally request the Rural Settlement Boundary of Ardclough is altered to accurately reflect the landholding of the Cliff at Lyons Hotel (as per Figure 1.0) thus allowing the Hotel to conduct operations in a manner which would allow the relevant tourism policies (outlined in Section 3.0) to be met and showcase the high-quality tourist accommodation available in Kildare.

Our Client also requests that consideration is given to the spatial planning formation of the proposed Rural Settlement Boundary, to allow for transitional uses outside of the formal boundary. While additional adjoining lands are not yet in the ownership of the Hotel, we would hope that consideration is given to the potential further extension of the boundary to facilitate a sustainable expanded use of adjoining, underutilised lands. In particular, lands to the south and south-west of the site, which would allow for a well-considered expansion of the settlement from a spatial planning perspective. These lands would not be specifically zoned for a particular form development, rather they would reflect the existing settlement in-situ.

We therefore formally request that the thoughtful consideration of good spatial planning principles is applied to the existing Rural Settlement Boundary of Ardclough more generally, but particularly in lands adjoining the Cliff House Hotel which are already an integral part of the settlement.

5.0 SUMMARY AND CONCLUSION

We request that consideration is given to the submission outlined above in relation to:

- 1. The alteration of the Rural Settlement Boundary for Ardclough, to accurately reflect the current landholding of the Cliff at Lyons Hotel;*
- 2. Consideration of the wider settlement boundary pattern from a spatial planning perspective to accurately reflect the settlement in situ, while also allowing for the potential, sustainable expansion of the settlement and the hotel;*
3. The inclusion of specific text to support future development of the Cliff at Lyons Hotel, as outlined above.

In the interests of the future sustainable development of the Cliff at Lyons Hotel and the wider area, we request that Kildare County Council support the above.

In closing, it is respectfully requested that the Planning Authority consider this submission for the reasons outlined above. We look forward to acknowledgement of receipt of this submission in due course. Please revert with any queries to the undersigned.

Yours faithfully,



Órla Casey
Associate
Tom Phillips + Associates