

***Submission by Fáilte Ireland, the National Tourism  
Development Authority***

***to***

***The Draft National Planning Framework (NPF)  
2040***

**9<sup>th</sup> November 2017**



This document sets out Fáilte Ireland's comments and recommendations to the Department of Housing, Planning and Local Government on the Draft National Planning Framework (NPF) 2040 as published in September. This short submission builds on our original submission, which was made in March 2017.

As part of our original submission, we identified five key enablers to where and how alignment between tourism and the NPF can best be achieved. We also identified where possible and appropriate, policies and projects, which might support this alignment.

Fáilte Ireland acknowledges that the Draft NPF is a high-level document and that further detail will be provided through the subsequent plans which stem from this Framework such as the proposed Regional Spatial and Economic Strategies (RSEs) and Metropolitan Area Spatial Plans (MASPs). However, these plans will take their lead from this NPF and therefore it is vital that the information contained within the NPF is both accurate and representative of the tourism sector in Ireland.

It is considered this is currently not the case and that the current draft of the NPF does not accurately represent or reflect the nature or value of the tourism sector in Ireland, its land-use characteristics and dependencies, economic value or social and community reach. However this could be rectified if the following two areas were addressed:

- 1) the description of the tourism sector in general was changed, and
- 2) the language used to reflect its importance as a strong economic sector, with associated land use and resource requirements was also altered to reflect this more accurately.

Therefore, we are now requesting that the following changes to text are made:

- 1) **The Tourism section under Chapter 4-Section 4.6 Planning and Investment to Support Job Creation, is rewritten. At present tourism is represented as somewhat of a by-product of agriculture rather than a sector of equal importance, which although linked in many ways to landscape and agriculture, also requires additional consideration as a land use sector in its own right.**

We recommend the following wording for the Tourism section of this chapter is used as the proposed appropriate approach to future tourism spatial planning:

*'In 2016, the tourism and hospitality sector in Ireland supported in the region of 220,000 jobs. Overseas visitors contributed an estimated €5 billion to the national economy in 2016. Domestic tourism expenditure is estimated at €1.8 billion. This total out-of-state and domestic tourism expenditure represents in the region of 4.0% of GNP in revenue terms.*

*Tourism has a strong economic value which should be adequately represented and appreciated in the development of national policy and should not be portrayed as a fall-back option or alternative where no other 'weighty' economic activity is considered viable. This is and should not be the case for a sector that is a significant player and economic engine in many cities, towns and villages right across Ireland and which has the capacity to directly and indirectly sustain communities, create employment and deliver real social benefits for rural Ireland.*

*Outside of the cities and larger towns, tourism in Ireland for the most part takes place in rural areas. Unlike many other countries where city or resort tourism forms the most significant part of the tourism offering, Ireland's tourism proposition is mainly rural in nature. A typical 'destination' at sub-county level will usually comprise of a town which will act as a 'hub' offering a range of visitor services and facilities, including accommodation, combined with a large rural area which contains a range of 'attractions'. Planning for tourism should be based on an acceptance that not all areas present the same opportunities or are as appealing to visitors, and significant amounts of investment or infrastructure may still not alter that. For tourism, the development of the propositions such as the Wild Atlantic Way or Ireland's Ancient East provide 'regional' platforms of scale upon which to showcase Ireland in the international marketplace.*

*However, in order for destinations to succeed spatially, rural areas outside or adjacent to tourism 'hubs', which normally comprise urban settlements such as towns and villages, will need to cluster assets and leverage opportunities presented by the successful tourism hubs in their areas. The development of clusters of tourism businesses and providers to work together should be supported to provide a more attractive experience to visitors, provide better opportunities for communities, towns and villages and ensure that limited resources and supports are targeted to where the greatest impact can be achieved. Linkages and services in towns and villages which support economic activity in a wider rural area should be supported.'*

## 2) **Tourism is recognised as a Core Sector within the NPF**

Other than within **Section 7.4 Co-ordination of Investment in Infrastructure** which refers to cross border initiatives with Northern Ireland, tourism could be perceived as a 'secondary' sector and a by-product of other more intensive land use sectors in Ireland.

An example of this is in relation to National Policy Objective 21 which underpins **Section 4.6 Planning and Investment to Support Job Creation**, as mentioned previously above. This currently states that the objective is to '*Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture and diversification in to alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism*'.

This misrepresents the value of the tourism sector which is more than a by-product of agriculture, fishing or forestry. While a high quality landscape is vital for tourism, it is a sector that should be considered in its own right, and is deserving of being placed alongside the agriculture and food sectors in the above objective. Fáilte Ireland recommends that the above section should be redrafted to read as follows: '*Facilitate the development of the rural economy through supporting sustainable and economically efficient agricultural, food and **tourism sectors**, together with .....*'

Another example of this occurs at **Section 7.4 Co-ordination of Investment in Infrastructure**, which refers to cross border initiatives and has a very strong section on tourism. However, this is also required at a national level across all of Ireland and across sectors, where investment could be leveraged further if sectoral investment was co-ordinated appropriately. **Section 4.8 Investment Co-Ordination**, goes some way to address this but tourism has been omitted from this and instead is presented as a beneficiary of the work of other departments/ sectors rather than as a sector with specific requirements which also need to be taken in to consideration and planned for appropriately.

This approach could lead to issues with the subsequent preparation of the RSEs and MASPs whereby the tourism sector is omitted from specific objectives in the NPF which could then lead to a misrepresentation or omission in the subsequent plans to follow. We therefore request a revision to the text in Objective 21 and Sections 4.6 and 4.8 above and to areas where tourism is referenced in the Draft NPF.

## **Conclusion**

Fáilte Ireland welcomes the preparation of the National Planning Framework 2040 which will provide a longer-term vision and spatial framework upon which the future of Ireland can be planned at a strategic level. However, the Authority is also eager to ensure that the tourism sector is recognised within the NPF for the value it currently delivers to the Irish economy and for the extent to which it can contribute to the sustainable development of both urban and rural Ireland over the next 20 years.

It is considered however that our recommended changes and additions to the text which refers to tourism are required in order to ensure that tourism is represented appropriately and not as a by-product of another more intensive land use sector such as agriculture. Instead it should be represented as a sector that is a significant player and economic engine in many cities, towns and villages right across Ireland and which has the capacity to directly and indirectly sustain communities, create employment and deliver real social benefits for rural Ireland.

We therefore recommend that this is addressed now in the final National Planning Framework 2040, so that the plans and strategies which will follow from this Framework for development are adequately informed and take due consideration of tourism as one of the most important and indigenous economic sectors in Ireland.

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