

**Northern & Western Regional Assembly  
The Square  
Ballaghaderreen  
County Roscommon  
F45 W674**

By email to: [reses@nwra.ie](mailto:reses@nwra.ie)

**8<sup>th</sup> February 2019**

**Re. Submission by Fáilte Ireland to the Draft Regional Spatial and Economic Strategy  
for the Northern and Western Region**

A Chara,

This submission has been prepared by Fáilte Ireland, the National Tourism Development Authority, in response to the public notice seeking submissions in relation to the published Draft Regional Spatial and Economic Strategy for the Northern and Western Region for the period 2019-2031.

As part of our original submission on the Initial Public & Stakeholder Consultation Issues Paper and through engagement via the Technical Working Group (TWG) we set out the importance of tourism to the Irish economy, the policy frameworks surrounding tourism and requirement to incorporate tourism factors into spatial planning. We also identified where possible and appropriate, a number of recommendations to support, grow and underpin tourism within the Draft Regional Spatial and Economic Strategy for the Northern and Western Region.

This submission sets out Fáilte Ireland's comments and recommendations to Northern and Western Regional Assembly on the Draft Regional Spatial and Economic Strategy. This submission is intended to support the preparation and delivery of an effective RSES for the Northern and Western Region. Additional specific comments are provided in Appendix I (Specific comments on sections of the Draft Plan).

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## 1 Tourism in Context

Tourism is one of the largest and most important sectors of the economy, providing employment for approximately 260,000 people, an economic contribution of €8.4 billion, and exchequer revenue of €1.78 billion, which helps fund other key public services.

The Northern and Western Region contains some of Ireland's wildest and most uniquely Irish landscapes, culture and heritage. This region contains, by far, the majority of Ireland's islands; the nation's largest and most extensive Gaeltachtaí; the most extensive areas of least population; the largest areas of High Nature Value Farming [HNV] and the largest areas of ecological protection and half of Ireland's National Parks.

The Landscapes of the Northern and Western Region are nationally, and internationally renowned. The Region boasts a number of National Parks: Glenveagh National Park Co Donegal, Connemara National Park Co Galway & Wild Nephin Ballycroy National Park Co Mayo, Marble Arch Caves Geo Park, Co Cavan & Co. Fermanagh (not an IUCN designated National Park). In addition to the recreational, and outstanding amenity value these Parks present, there are multiple other attractions, such as numerous Blue Flag beaches, world class golf courses, and a myriad of walking and cycling trails, blueways and greenways.

A small number of these attractions are already well established (the Great Western Greenway), and the visitor experience is being enhanced on an ongoing basis, such as the development of the Wild Atlantic Way Signature Discovery Points. The Region's landscapes, which are nationally and internationally renowned contain iconic scenery such as The Aran Islands, Lough Corrib, Ben Bulbin and Sliabh Liag seacliffs.

The Northern and Western Region is sometimes regarded as Ireland's 'best kept secret' – catering more for domestic than international tourism. This region plays a crucial role in sustaining and improving an activity of economic and social significance of national importance.

For this reason, it is critical that the Spatial and Economic Strategy for the Northern and Western Region gives a central place to tourism. It must identify locations, linkages & priorities to deliver the goals of this sector.

There is undoubtedly scope for significant growth in this region – in terms of accommodation, attractions and activities in these wild and culturally distinctive places – but it needs to be carefully matched to local conditions, differences and distinctive features.

With additional and emerging projects of scale such as the National Geographic accolade for County Donegal as 'Coolest Place', there is undoubtedly scope for significant growth in the offer of our region from a cultural & heritage viewpoint. The RSES must play its role in conserving, growing and enhancing the cultural & heritage offer, and to do so in tandem with protecting and enhancing our places of environmental value. The RSES must make provision for an integrated

approach to the planning, development and marketing of the tourism offer by the various stakeholders involved in the industry, which could bring added benefit to the region.

Tourism is also important as an economic factor for regional development – often delivering full time and seasonal income into peripheral areas where employment opportunities are either scarce – or which constitute a suite of mixed activities throughout the year. Tourism-related activities can be an important source of finance for the capital investment needed to support development and maintenance in areas of low population. It can play a key role in ensuring the continued economic viability in more peripheral rural areas – with important consequences for both cultural and social continuity as well as better utilization of capital investment in sparsely populated areas.

## 2 Key requirements for Sustainable Growth

For the tourism industry to deliver sustained growth, there are certain requirements for goals to be achieved. Some of these critical factors are outlined briefly below.

### **Airline and Airport Capacity**

- To accommodate increased tourist numbers, airline and airport capacity would have to grow significantly. The challenge will be to grow this air capacity in a way that it is sustainable based on a higher passenger mix of overseas originating passengers than the current levels.

### **Accommodation Capacity**

- Over the period of this strategy a very significant increase in tourism bed stock to accommodate any sustainable increase in tourist numbers will be required. All parties involved in tourism help to create the conditions for all types of accommodation to be developed. We will introduce a coordinated regional and seasonal development plan to facilitate private sector investment in accommodation.

### **Tourist Experiences**

- **Leisure** – For Ireland to become a destination of choice for our target markets, it will be important that new compelling and must-see and must-do tourist attractions are available that will capture overseas tourists’ imagination and provide them with a clear and motivating reason to travel to Ireland. It will also be important to enhance our existing tourist attractions and support the development of clustering of visitor attractions.
- **Business** – There are great opportunities to enhance our standing as a top-quality destination to host business events. To satisfy demand, there is a need for additional conference and gala venues both in Dublin and in the regions.

### **Infrastructure**

- We have great attractions around the region and to open up regional opportunities it is imperative that visitors can get around the region easily.

### **Visitor Management**

- Tourism is highly visible to the population and has a broader impact on the resident population of a country than economics alone. The presence of significant tourism populations in rural areas often helps drive infrastructural development or the provision of public services that may otherwise be considered uneconomic. Clearly, tourism has many positive impacts, but we must always be aware that, if not properly managed, there is a danger that its effects may be detrimental rather than beneficial to residents' quality of life and the environment.

Fáilte Ireland welcomes that the Draft RSES for the Northern and Western Region has had regard to the above requirements for the most part and acknowledges this throughout the document. Further reference and commentary on the above requirements are provided in more detail in the relevant sections.

## **3 Review and Commentary of the Draft Regional Spatial & Economic Strategy**

This section of our submission provides a commentary of the various chapters and sections of the document. As has been outlined earlier in this document, tourism is a unique and vital sector in Ireland, with its contribution to the economy and the employment the sector generates. Fáilte Ireland welcomes that this is recognised in many sections of the document and is explicitly seen as a key sector for the economy of the region.

### **3.1 Strategic Analysis & Vision**

This section of the document highlights a few challenges for the region including the impact of Brexit, climate change and historically low levels of investment in enabling infrastructure. In addressing these challenges, the growth framework set out in section 2.8 which defines each priority, quite rightly acknowledges that they are all mutually complementary. In this regard, there is a fundamental link between tourism and many other sectors which needs to be acknowledged, which should result in an increase in the level of policy cross-compliance and

consideration of potential benefits and impacts on tourism in the development of policy. The tourism sector does not directly own or manage the tourism assets which underpin the sector and therefore is reliant on this alignment of policies for the sustainability of the sector.

### 3.2 People and Places

The settlement strategy in the draft strategy is welcomed and it should provide guidance to local authorities in the preparation of core strategies in their City and County Development plans going forward. The general theme of sustainable compact growth of both urban and rural areas is welcomed and will align with Fáilte Ireland's approach which distinguishes between types of towns, based on their tourism functionality. The targets set out in the draft to deliver the majority of new housing within the existing built-up footprint of settlements in line with NPF policy is welcomed.

It is vital that this is implemented and supported not only through development plans but also through investment. Tourism services and facilities should be clustered within established settlements as this will serve to protect the quality of the Irish environment; foster strong links to a whole range of other economic and commercial sectors and sustain the host communities; and utilise existing ancillary services and facilities such as water and wastewater infrastructure, power supply etc, rather than creating a requirement for further development in the Irish landscape.

#### Galway - Metropolitan Area Strategic Plan (MASP)

The NPF strategy is to focus a significant proportion of population growth in Ireland's Cities, while also seeking to improve urban infrastructure and amenities, liveability/ quality of life and the quality of the built environment. It is noted that Galway has been Ireland's most rapidly developing urban area for decades and is a key driver for the west of Ireland and the wider Northern and Western Region.

Therefore, the MASP for Galway should Identify the key change parameters required i.e. population, employment, housing etc, identify the sequence of infrastructure prioritisation, delivery and co-ordination and ultimately deliver compact regeneration and growth. The MASP sets out a vision for Galway and provides a commentary relating to several sectors and spatial areas, however there is a lack of a coherent framework.

To this end, it is recommended that the MASP be refined and structured to include the following to achieve the vision;

- Guiding Principles

- Key Enablers including infrastructure
- Policy Objectives

Fáilte Ireland welcomes that the role tourism plays in Galway is recognised and the potential to develop the sector. The following statement is specifically noted.

*“There is huge potential to develop tourism and extend bed nights as a gateway to the North and West Region with potential to further develop urban, culture/heritage/food tourism. The location of the City mid-way along the Wild Atlantic Way is also an opportunity for expansion of the tourist product.”*

The metropolitan area of Galway is a key gateway to the wider county and region with the area playing a key role in providing large quantities of accommodation and support services for the tourism industry. Tourism continues to grow steadily in Galway city and across the county, Fáilte Ireland statistics for Co. Galway, for example, estimate that there were 2.7 mn visitors to the county in 2017, generating nearly €840 mn in revenue. Overseas tourists account for the majority of demand, though domestic demand also accounts for a substantial proportion of Galway’s tourism activity.

In order to realise the potential outlined above, it is recommended that a policy objective be inserted in this section which supports the role of Metropolitan Galway’s tourism assets as a significant tourism destination capitalising on its tourism attractions including the Wild Atlantic Way. Furthermore, it is crucial that investment in infrastructure including public transport and the Galway City Ring Road are supported, prioritised and advanced during the lifetime of the RSES.

#### Letterkenny & North West City Region MASP

With a cross-border catchment of around 400,000 people, the North West region represents the fourth largest urban agglomeration on the island of Ireland. The City Region set out in the Draft strategy covers an area of 2394 square miles with Letterkenny and Derry-Londonderry as its linked gateways.

Having regard to the diverse and rich nature of this city region, it is important to highlight that the landscape and environs outside the main urban areas is obviously varied and predominantly rural. The diverse nature of the landscape and environment includes coastal areas (including the Wild Atlantic Way), mountains, natural habitats and Gaeltacht areas. While policy 4.4 on page 98 acknowledges the value of these assets and the opportunities for a broad range of uses, it must also be balanced with the sustainable development of the region. Fáilte Ireland welcomes the policy objective which seeks to facilitate the appropriate development of tourism along with

sustainable tourism activities that can leverage linkages to creative industries, culture and the natural and built heritage and access natural resources that can benefit smaller rural towns.

In order for vision of the MASP for the North West City Region and for the region to grow and prosper investment in transport infrastructure is key. A number of objectives are set out to enhance accessibility to the region and within the north west region itself which are welcomed, however a number of projects and upgrades to the network are required. From a tourism perspective improving cross border transportation links and the development of new links are vital. Of particular importance at regional level is the A5 Western Transport Corridor and the Completion of the A5/N2 dual carriageway system from Dublin to Derry.

### Regional Growth Centres

The adopted NPF acknowledges that the influence of the five cities in Ireland cannot, and does not, extend to the entire country, in particular the North-West and Midlands regions. These regions require their own focal points for investment and employment and, as is stated in the NPF, it is *“apparent that Sligo in the North-West and Athlone in the Midlands, fulfil these roles to a greater extent than elsewhere”*.

Having regard to this, it is welcomed that Athlone, Sligo and Letterkenny/Derry are recognised as being critical to the implementation of effective regional development as set out in the NPF. Regional Growth Centres will play a crucial role as tourism hubs for the wider areas and it is vitally important to ensure provision is made for the expansion in accommodation and facilities within these hubs and towns along with supporting infrastructural investment including investment in transport.

### Athlone

It is noted that Athlone straddles two assembly areas. Therefore, while some parts of Athlone are within the NWRA boundary and others outside, it is critical that both the EMRA & NWRA strategies are aligned and consistent.

Athlone is a critical hub and a central Destination Town in Ireland’s Hidden Heartlands and, as such, it’s proposed status in the RSES as a Regional Growth Centre, with a strong emphasis on the tourism development potential of the town, is welcomed.

The town boasts a strategic location on the banks of the River Shannon and the midpoint of the strategic Dublin to Galway Greenway which forms part of the Eurovelo2 (the Capitals Route) traversing Europe from West to East (Galway to Moscow). Athlone has a strong historic and cultural core, along with its attractive natural environment along the banks of the River Shannon. In addition to the key objectives that the RSES states should be supported by the Joint UAP

between Westmeath and Roscommon County Councils, the following additional objectives could also be recommended:

To provide for the implementation of the Shannon Tourism Masterplan which is currently being prepared by Waterways Ireland, in partnership with Fáilte Ireland and the relevant Local Authorities. The Shannon Tourism Masterplan will identify regional strategic priorities for the sustainable development of tourism along the Shannon. As such, it is important that investment is provided to ensure its implementation.

P136 – Bullet point 6 – Amend to: ‘Support the promotion of Athlone as a key destination town in the development of Ireland’s Hidden Heartlands.

### *Sligo*

The designation of Sligo as a Regional Growth Centre is welcomed by Fáilte Ireland and provides an opportunity for Sligo to function as a centre of employment, attract investment, human capital and support the wider hinterland.

It is noted that the MASP area includes towns such as Strandhill and Rosses Point. As outlined in the document the main employment generator in these towns is tourism. A prime example of this is the recent announcement of the development of a National Surf Centre at Strandhill, County Sligo, funded through Fáilte Ireland’s Large Capital Grants Scheme and through the Rural Regeneration Fund. The project aims to provide a high-quality National Surfing Centre of Excellence. The project will also seek to attract new visitors both domestic and overseas to Sligo and will act as a focal point for surfing and other outdoor activities on the Wild Atlantic Way. Fáilte Ireland is pleased that the role tourism plays in these towns is acknowledged and must be considered in any future plans/strategies that emerge.

As Sligo town is a congested urban centre it is vital that any development to the surrounding hinterland is planned for in a concentrated manner in lieu of a predominance of one-off housing. Furthermore, for Sligo to realise its potential under the RSES further investment in connectivity to other cities nationally and well as to smaller centres within its own hinterland is critical. Improved access and frequency of public transport services within the region and to Ireland West Airport Knock must also be improved and a priority.

### *Key Towns*

From a tourism perspective certain key towns and regional growth centres have similar roles in many instances. Namely, that they act as a base or hub for a whole host of activities and attractions within their immediate environs and hinterlands. Therefore, we would again reinforce that it is vitally important to ensure provision is made for the expansion in

accommodation and facilities within these towns along with supporting infrastructural investment including transport links, public realm etc.

Fáilte Ireland welcomes the direction that development plans should provide for sustainable growth within town centres with a focus on regeneration of brownfield sites in lieu of developing out of town greenfield sites. This approach will allow tourism services and facilities to be clustered within established settlements as this will serve to protect the quality of the Irish environment; foster strong links to a whole range of other economic and commercial sectors and sustain the host communities; and utilise existing ancillary services and facilities such as water and wastewater infrastructure, power supply etc, rather than creating a requirement for further development in the Irish landscape.

It is noted that the strategy for the eight key towns identified in the NWRA region highlights tourism as a primary development and economic driver. While this is supported and very much welcomed, it is important that tourism is not seen as ‘fall back’ in the absence of other economic development strengths in some towns. It is crucial that an analysis of the potential for tourism growth and economic benefit in these towns is carried out.

The following recommendations relating to Cavan, Carrick-On-Shannon and Roscommon should be included as key priorities to strengthen and further promote tourism in these towns.

P144 – Recommend that an additional bullet point be added for Cavan: ‘Given its strong accommodation base and range of attractions surrounding it, that Cavan be promoted as a key destination town in Ireland’s Hidden Heartlands’.

P146 – Bullet point 6 (Blueways). Add the following sentences to this bullet point: ‘To ensure the implementation of the forthcoming Shannon Tourism Masterplan which will provide a clear strategic direction for the sustainable development of tourism along the Shannon. Given its strong accommodation base and range of attractions surrounding it, that Carrick-on-Shannon be promoted as a key destination town in Ireland’s Hidden Heartlands’.

P150 – Recommend that an additional bullet point be added for Roscommon: ‘Given its strong accommodation base and range of attractions surrounding it, that Roscommon be promoted as a key destination town in Ireland’s Hidden Heartlands’.

### 3.3 Growth Ambition 1: Economy & Employment

#### Tourism

This section of the draft highlights the importance of certain sectors to the region. Fáilte Ireland is pleased to see that the tourism sector is duly recognised as being a significant sector within the region and the inclusion of a number of tourism specific regional policy objectives which

reinforce this. As outlined earlier in our submission, there is a fundamental link between tourism and many other sectors which needs to be acknowledged, which should result in an increase in the level of policy cross-compliance and consideration of potential benefits and impacts on tourism in the development of policy. The tourism sector does not directly own or manage the tourism assets which underpin the sector and therefore is reliant on this alignment of policies for the sustainability of the sector.

The overarching policy objectives for the tourism sector as outlined on page 171 are welcomed. We know that a key motivator for our visitors in choosing to come to Ireland is our landscape and scenery, and access to this is imperative to support the work that Fáilte Ireland, tourism stakeholders and the industry is undertaking to both maintain and grow the tourism sector in Ireland. Therefore, we feel additional policy objectives are required here to support increased access to the countryside and coastal areas and to enhance access to state lands and attractions managed by stage agencies. In this regard, the case study on page 171 of Wild Nephin Ballycroy National Park is a prime example of a strategic partnership between Fáilte Ireland and National Parks & Wildlife Service.

The North Western Region is home to sections of three of Fáilte Ireland's propositions including the northern section of the Wild Atlantic Way; Ireland's Ancient East and Ireland's Hidden Heartlands. We note on page 172 the title 'Our Tourism Destination Hierarchy' is provided. It is considered that this might imply that certain tourism propositions are more important to the region than others. It is recommended that this title is reworded to 'Our Tourism Assets' or 'Our Tourism Propositions'.

Fáilte Ireland notes that the draft strategy explicitly names always on towns with bedspace capacity and seasonal towns. This emanated from our earlier submission to the 'Issues Paper' stage of the process. However, having regard to ongoing Fáilte Ireland strategies which are evolving it is recommended that Destination Towns – either 'always-on' or 'seasonal' – would not be named in the document under any of the brands in a way that 'designates' them as Destination Towns.

Having regard to the above we have set a comprehensive list of comments and amendments under appendix 1 which we feel should be made to ensure that the strategy fully aligns with Fáilte Ireland's propositions and strategies.

Note we have also attached the correct map of the Fáilte Ireland regions for insertion into P169 of the strategy (this one contains the overlap area between WAW and IHH)

### Seafood Sector

Aquaculture presents significant opportunities for marine tourism. There is opportunity to improve public knowledge of the industry and for farmers to become involved in developing

creative ways of diversifying and supplementing their farm income. The coastal nature of aquaculture also complements the tourism products promoted through the Wild Atlantic Way.

The synergies between aquaculture and tourism are also evident in the success of numerous seafood festivals throughout the country. The Galway International Oyster and Seafood Festival for example has been running for 63 years and one of the main attractions for visitors has been experiencing the Irish farmed oysters from numerous bays around the country. Other festivals in the region include; the Connemara Mussel Festival and the Clarenbridge Oyster Festival.

Fáilte Ireland and BIM have further captured the synergy between aquaculture and tourism through *Taste the Atlantic – A Seafood Journey* where tourists can experience the Wild Atlantic Way through aquaculture producers from Erris, Co. Mayo to Galway Bay. Tourists can visit mussel and oyster farms and can also learn about the production of Irish organic salmon and experience the smoking of this much sought-after product.

While there are undoubtedly many opportunities presented by the development of aquaculture, the sustainable development of aquaculture must be in keeping with other development objectives for the area. In essence, any aquaculture development must ensure that local habitats, flora, fauna and avifauna are not adversely impacted.

Having regard to the above, Fáilte Ireland supports the growth of the sector on a sustainable basis and recommends that regional policy objective 59 be amended to ensure that increased growth in the industry is subject to marine resources being sustainably managed.

### Marine and Blue Economy

Fáilte Ireland welcomes the recognition of the rich maritime underwater cultural heritage with the draft plan. However, we feel that the numerous maritime villages and towns in the region also play an integral part of the region's built and cultural maritime heritage. Maritime heritage plays an important role in tourism branding of coastal areas. This is especially prevalent within the Wild Atlantic Way proposition. An attraction such as the Galway Hooker Boats is a prime example which promotes our maritime heritage. Providing enhanced access to the coastline and to cultural, built and natural heritage improves appreciation and the value of these important assets. Having regard to the above, we recommend that regional policy objective 60 spell out Wild Atlantic Way in the objective instead of using the acronym.

In relation to policy objective 61 we would recommend that this be amended to include access to water for tourism at ports and harbours which would allow for multi usage of these valuable assets.

### 3.4 Growth Ambition 2: Environment – Natural Region

The protection of Ireland’s natural environment calls for a sustainable and balanced approach to successfully growing our tourism sector. The recent success of tourism has brought many benefits to Ireland but also some challenges for the future. Any decline in visitor satisfaction or environmental quality will inevitably damage our tourism reputation.

As the tourism sector continues to grow it must do so within a framework of sustainability. This approach underpins our approach in the development and delivery of our strategies.

Fáilte Ireland welcomes the acknowledgement that the growth in domestic, and overseas visitor numbers to the region’s Natural Heritage assets illustrates that there is merit in continuing to develop the potential of these assets, while ensuring their intrinsic value is retained, and enhanced. We welcome regional policy objective 77 which seeks to protect, manage and conserve the quality, character and distinctiveness of our landscape and seascapes.

Section 5.5 acknowledges the abundance of natural assets in the region which is reflected in turn by a significant number of designated sites for nature conservation. We are supportive of the policy objectives which ensure the sustainable use of these assets and resources. We feel there should be reference in this section to the role that tourism can play in sustainable way subject to appropriate management within these areas.

Section 5.7 of the chapter recognises that the region has a rich and varied built heritage that reinforces our sense of identity, contributes to regional landscape character and fosters our sense of place and wellbeing. A number of OPW managed sites are highlighted on page 212 along with the number of visitors to these sites in 2017. It is acknowledged that that Fáilte Ireland in partnership with OPW have examined which investment priorities would leverage the potential of National Monuments to benefit Ireland’s visitor offer and enhance the experience of all.

We therefore welcome the inclusion of policy objectives 89 and 91 which seek to enhance the potential of these site and support a programme for sites to be developed in a manner that shall enhance the visitor experience to the region focusing upon supporting the Wild Atlantic Way and the Hidden Heartlands tourism brands.

Fáilte Ireland acknowledges the recognition in the draft to the development of greenways, blueways and peatways and the opportunities to develop a number of flagship projects and of a scale to deliver an increase in activity tourism. The potential economic benefit is considered the greatest for the ‘iconic’ national greenways, which can be promoted internationally and deliver a multi-day experience for visitors, motivating people to come to Ireland for this experience. These flagship routes have the potential to link and extend to regional routes which will encourage visitors to stay in an area longer or to overnight in order to cycle the greenway.

The development of Blueways provides valuable opportunities for rural communities to attract more visitors. These values lie not only in the recreational opportunities that they offer but also in their potential to stimulate local businesses and regenerate local areas. A blueway can be defined as *“a network of approved and branded multi-activity recreational trails and sites, based on and closely linked with the water, together with providers facilitating access to activities and experiences”*. This definition is as defined in the National Blueway Development and Management Guide.

While it is recognised that the majority of blueways may be developed on inland waters, there is potential to develop coastal blueways for activities such as kayaking and snorkelling also.

### 3.5 Growth Ambition 3: Connectivity – Connected Region

A well-managed, maintained and connected network of both public and private transport systems in Ireland is a key enabler of the continued growth of the tourism sector.

Transport in existing strong tourism areas needs to be supported and consolidated. In addition to this, we need to achieve a greater regional spread of tourism to all areas. As part of Fáilte Ireland’s strategic ‘regionality’ objective to achieve this, we need to expand our transport infrastructure throughout the NWRA region.

From a tourism perspective, we believe that the strategic priorities for transport should include;

- Highlight the importance of sustainable transport for the successful operation and continued growth of tourism.
- To provide a wider range of targeted public transport options for tourists who wish to travel from urban areas to rural based tourist attractions and amenities. Possible delivery mechanisms to be explored would include the extension of the Rural Transport Network to include tourism objectives and key tourism sites.

To this end, we are pleased to see the inclusion of priorities for transport investment across all modes of transport.

The designation of Ireland West Airport Knock as a Strategic Development Zone in recent years is welcomed. Given Ireland is an island nation, we rely on high-quality international connectivity as being fundamental to our international competitiveness, our trading performance in both goods and services, and our attractiveness as a location for both foreign direct investment and tourism. IWAK is a major piece of tourism infrastructure in the region its tourism value and contribution is significant.

The important role of seaports in the NWRA region cannot be underestimated. The not only sustain communities, provide access to the many islands but also play a key role in marine

tourism. We therefore welcome the inclusion of policy objective 105 which seeks to develop and enhance the seaports and harbours. However, it should be noted that there is huge potential for these public resources to be shared with private enterprises including tourism activity providers. We feel that there is merit in having specific objectives for airports and seaports/harbours separately as they fulfil different functions. There is also potential to support tourism activity within the seaports/harbours objective.

A key priority of Fáilte Ireland is improving the tourist experience. To do this, improvements are needed in the existing road network for example to remove bottlenecks and increase and improve connectedness to and between key tourism destinations. It is reassuring that a number of strategic and regional road schemes are to be supported and progressed during the lifetime of the strategy. We fully support policy objective 108 with regard to the N6 Galway Ring Road. This is vital for the sustainable development of tourism in Connemara. The lack of this infrastructure is fast becoming a serious threat to tourism in Connemara given the additional unwarranted travel time required to cross Galway city.

One area where we feel there is huge potential to increase connectivity is in rural areas and smaller towns. Many of these areas have either very poor tourist numbers for the quality of the asset or have traffic problems at peak tourism times. This can lead to tourists having a poor experience or, worse, not visiting at all if word of mouth is unfavourable.

Public transport and enhanced walking and cycling facilities have a key role to play in addressing these issues and opening up access to the abundance of natural assets. To this end, we welcome policy objectives to provide sustainable travel in rural areas along with reviews to bus services in the region. We feel there is potential for the reviews to consider the needs of tourists and visitors to these areas as services could be routed around tourism attractions and assets in the area. Policy objectives 122, 123 should be strengthened to cater for the needs of visitors.

We feel that a new policy objective should be included under the Rural Transport section which supports the Local Link Rural Transport Programme and an extension of it to include tourism objectives. This would have the added benefit of sustaining services and improving viability in more remote areas.

### 3.6 Quality of Life – Inclusive Region

This NWRA region plays a crucial role in sustaining and improving tourism which is a significant activity of economic and social importance. Facilities that are used by visitors play an important role in establishing and sustaining both the desirability and the quality of life for residents and visitors alike. Maintaining attractiveness is a key activity for the region's ability to attract the foreign direct investment that is the engine of the national economy. As much of the material

assets and infrastructure that sustain tourism – railways, ports, airports, hotels, the entertainment and food and drink sector and of course our natural landscape – these also serve the large resident and business populations of the urban and rural areas.

A strategic objective of Fáilte Ireland is to ensure that the economic benefits of tourism are spread regionally across the country. Quality visitor experiences and the enhancement and further development of Ireland’s recreational tourism offering provide social benefits to local communities. For example, the continued development of our recreational infrastructure will not only support Ireland’s developing rural tourism industry but will also provide better recreation options for local people and families for their own enjoyment of the countryside and the associated health benefits.

We feel that there is a lack of recognition of the role of recreational and open spaces particularly the influence on people’s quality of life and the positive impact they can have on communities. It is therefore recommended that a policy objective be included in this chapter to facilitate the development of good quality sports and recreation facilities, including networks for walking, cycling and other activities.

### 3.7 Growth Ambition 5: Infrastructure – Enabling our Region

The provision and delivery of infrastructure will enhance the quality of the environment and facilitate sustainable economic development. We support investment to ensure resilience of water supply and waste water treatment for the Region. The importance high-quality Waste Water Treatment Plants to ensure treated waste water will not harm or pollute the surrounding environment when it is discharged into it is crucial to protect our coastal areas, rivers and lakes. The quality of bathing waters is also paramount to the tourism sector. In Ireland, we are particularly fortunate to have a varied and beautiful coastline with many pristine beaches that are open to the public to enjoy. To ensure their standard, it is imperative to continue to make strident efforts to protect and improve our waters. In 2018, the NWRA has 33 blue flag beaches in four coastal counties and two inland locations Portumna, Co. Galway and Loughrea Lake, Co. Galway.

Fáilte Ireland recognises the value and necessity of strengthening, improving and expanding energy infrastructure in the region, and that this in turn supports the growth of the tourism sector. While the Authority is generally supportive of the development of transmission infrastructure and is supportive of the economic benefits associated with its growth and development, potential impacts on landscape and the natural environment (including those on tourism) must be considered. The challenge still lies in striking a balance between the maintenance of landscape character and scenery as a tourism asset and facilitating the development of infrastructure. This puts even greater emphasis on the need for good planning

from the very beginning of the process and particularly in relation to site selection, design and pre-planning consultation stages.

It is noted that the statements in section 8.2 & 8.3 of the chapter fully support the development of renewable energy and strengthening of the electricity transmission in the region. While we are supportive of this, it is of key importance to Fáilte Ireland as the National Tourism Development Authority, to ensure appropriate protection for our landscapes and our seascapes.

Fáilte Ireland is concerned that a) no guiding principles are set out in the energy section of the chapter for Local Authority Development Plans and b) the regional policy objectives included do not make any reference to landscapes, including their environmental features, which must also be considered and assessed appropriately in considering the design and routing of both on and off shore grid infrastructure.

It is recommended that guiding principles be added along with a new policy objective which ensures that any potential impact upon tourism in the development planning of energy networks/infrastructure must be considered and tourism resources should be protected through the appropriate and sustainable planning and design of transmission infrastructure. (see proposed wording in appendix I) to ensure the above issues are addressed.

### 3.8 All Island Cohesion

Fáilte Ireland welcomes that the draft Strategy recognises the strong links between the NWRA Region and Northern Ireland. We are pleased that the draft has identified the importance of enhanced transport connectivity, to include cross-border road and rail, cycling and walking routes, as well as blueways, greenways and peatways. Connectivity through the ferry service across Lough Foyle, linking the Causeway Coast with North Donegal and the Wild Atlantic Way is also a significant and important service that is supported by the RSES.

Having regard to the ongoing and future uncertainty surrounding Brexit and the exposure of this region with Northern Ireland and the inter-connectivity of services, industry, communities and local economies, the RSES needs to be particularly cognisant of 'risk' associated with Brexit. Fáilte Ireland would welcome consideration be given to an interim review of the NPF and the RSES upon completion of Brexit negotiations, so that issues arising can be addressed as necessary.

## 4 Conclusion

Fáilte Ireland welcomes the publication of the Draft Regional Spatial and Economic Strategy for the Northern & Western Region. The statutory basis which will be afforded to it upon adoption, will support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions to 2031 and beyond.

We acknowledge that tourism is recognised as being a significant sector within the region and the inclusion of a number of tourism specific policy objectives reinforce this within the draft strategy. There is also a fundamental link between tourism and many other sectors within the region and the cross-sectoral approach between tourism and these other sectors has broadly been acknowledged. However, there are some areas where we feel this needs to be strengthened particularly in relation to the Galway MASP, tourism sector, connectivity and infrastructure chapters.

We therefore recommend that our comments and suggested amendments and additions are addressed in the published strategy, so that the plans which will follow from this strategy, including City and County Development Plans are adequately informed and take due consideration of tourism as one of the most important and indigenous economic sectors in the region and Ireland.

The cross-sectoral approach between tourism and other sectors, and the acknowledgement of the need for integrated policies and strategies is considered by Fáilte Ireland to be positive approach.

Please do not hesitate to contact us if you have any further queries or questions.

We thank you for your time and consideration of our submission.

Is mise le meas,



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Shane Dineen

Environment & Planning Manager, Fáilte Ireland

## 5 Appendix I - Specific Comments on the Plan

### **Chapter 3 – People and Places**

The Galway MASP should be refined and re-structured to include the following to achieve the vision;

- Guiding Principles
- Key Enablers including infrastructure
- Policy Objectives

Add the following additional objective on page 136 in relation to Athlone to align with the EMRA

- To provide for the implementation of the Shannon Tourism Masterplan which is currently being prepared by Waterways Ireland, in partnership with Fáilte Ireland and the relevant Local Authorities.
- P136 – Bullet point 6 – Amend to: ‘Support the promotion of Athlone as a key destination town in the development of Ireland’s Hidden Heartlands.’

The following recommendations relating to Cavan, Carrick-On-Shannon and Roscommon should be included as key priorities to strengthen and further promote tourism in these towns.

P144 – Recommend that an additional bullet point be added for Cavan: ‘Given its strong accommodation base and range of attractions surrounding it, that Cavan be promoted as a key destination town in Ireland’s Hidden Heartlands’.

P146 – Bullet point 6 (Blueways). Add the following sentences to this bullet point: ‘To ensure the implementation of the forthcoming Shannon Tourism Masterplan which will provide a clear strategic direction for the sustainable development of tourism along the Shannon. Given its strong accommodation base and range of attractions surrounding it, that Carrick-on-Shannon be promoted as a key destination town in Ireland’s Hidden Heartlands’.

P150 – Recommend that an additional bullet point be added for Roscommon: ‘Given its strong accommodation base and range of attractions surrounding it, that Roscommon be promoted as a key destination town in Ireland’s Hidden Heartlands’.

### **Chapter 4 – Economy and Employment**

#### *Specific to Tourism Section*

P169 Insert ‘The aim of regional tourism development is to grow the visitor economy of the region in a sustainable manner for the benefit of all stakeholders. Tourism development at a regional level involves a very wide range of stakeholders and businesses, and involves making a wide range of interventions in terms of infrastructure and public realm development, transport links, tourism product development, enterprise supports, commercial development, marketing and promotion, etc. all of which are tailored to the needs of the region, the destination and the enterprise’.

P169 – The following paragraph should also be inserted in this introductory section on p169 on the Visitor Experience Development Plans:

‘Visitor Experience Development Plans (VEDPs) will be continued to be prepared by Fáilte Ireland in association with a range of other stakeholders, including the Local Authorities, key stakeholders and members of the tourism industry. These plans are developed in order to realise the sustainable economic potential within Mature and Developing tourism areas. VEDPs are built on solid partnerships and collaboration amongst local and national stakeholders. They are the vehicle through which Fáilte Ireland aligns its own resources with those of its key stakeholders to deliver a 3-5 year commercial development plan that builds capacity and capability, primes demand, and delivers world class visitor experiences within defined geographic areas or across unifying themes. The key focus of these plans is to unlock the economic growth potential of an area by progressing a range of key initiatives that will motivate and facilitate potential tourists to visit and stay in the local area’.

P169 – The reference to ‘Tourist Towns’ in the last paragraph of the left-hand column should read ‘Destination Towns’.

P169 – First paragraph, right-hand column, should read: A tiered hierarchy of tourism provisions in both rural and urban areas, to support the sustainable development of Destination Towns, in accordance with Fáilte Ireland’s *Development Guidelines for Destination Towns*.

However, they can be mentioned throughout the document, where appropriate, as examples as (see recommendation for p175). Instead it would be appropriate to refer to our almost published *Development Guidelines for Tourism Destination Towns* which will be published in March 2019.

The following text should be used;

‘Fáilte Ireland has published *Development Guidelines for Tourism Destination Towns*, which these guidelines are intended as a practical aid to Local Authorities and others who consider their town to either be a tourism destination town or have the potential to develop as one and should be used as part of a developmental agenda. They draw together the most relevant insights into what visitors want and need and focus on the tourism elements of destination town development - on the understanding that planning authorities have access to a wide variety of other guidelines in relation to infrastructure, service planning, and public realm. It is recommended that any

interventions proposed to Destination Towns which are intended to improve the tourism amenity value of the town, should adhere to these Guidelines.

In summary, remove references to Destination Towns in Wild Atlantic Way from pages 172 & 173. The always-on towns can be referred to as examples of Destination Towns, but not as a definitive list.

We also recommend the removal of specific reference to Candidate Destination Towns and the listing of Cavan and Monaghan as Candidate Destination Towns on p174 & p175, but Cavan and Monaghan can be listed as examples of Destination Towns.

We recommend inserting new overarching policy objectives on page 171 as follows;

- Support working with relevant landowners and recreational/ tourism agencies to increase access to the countryside and coastal areas and to ensure maintenance of the existing network.
- Support the maintenance of, and enhanced access to state lands such as National Parks, Forest Parks, Waterways, etc., *together with Monuments and Historic Properties*, for recreation and tourism purposes.
- Support the preparation and implementation of Visitor Experience Development Plans within the Region to underpin the overarching regional tourism brands and to deliver greater tourism benefits and to promote the natural and cultural assets of the Region.
- Policy objective 35 on page 176 is under the Hidden Heartlands Section and should be moved to page 172 under Wild Atlantic Way.
- P175 – Amend Regional Policy Objective 31 – To ensure provision is made for the expansion in accommodation and facilities within key destination towns such as Carrick-on-Shannon, Cavan, Roscommon Town and Athlone. Supporting infrastructural investment will also be provided, including improvements to public realm, Transport Links, Accommodation, night time economy and the sustainably development of our natural and built heritage.
- P175 – Amend wording of Regional Policy Objective 32 – Ensure that Orientation and Information Points targeting the ‘slow tourism’ market are included for key towns, (Carrick on Shannon, Athlone, Cavan, Roscommon, Ballinasloe, etc.) as enabler for increasing bed nights and visitor numbers.
- P176 – New Regional Policy Objective – an additional policy objective to replace No.35 which has been moved to the Wild Atlantic Way section: ‘Ensure that the necessary resources and investment are provided for the implementation of the Shannon Tourism Masterplan’.

On page 172 the title 'Our Tourism Destination Hierarchy' is provided. It is considered that this might imply that certain tourism propositions are more important to the region than others. It is recommended that this title is reworded to 'Our Tourism Assets' or 'Our Tourism Propositions'.

#### *Specific to Marine and Blue Economy*

Regional policy objective 59 should be reworded as follows:

To enable the development (and / or expansion) of a number of strategic Marine Resource Innovation Parks, including locations at Greencastle, Killybegs, Co. Donegal and Cill Chiaran, Co. Galway, (Pairc na Mara), to increase aquaculture and seafood sectoral growth in the Marine Economy *subject to marine resources being sustainably managed.*

Regional policy objective 60 should spell out Wild Atlantic Way instead of using (WAW)

Regional policy objective 61 should include access to water for tourism in the first paragraph.

### **Chapter 5 – Environment**

We feel there should be reference in section 5.5 to the role that tourism can play in sustainable way subject to appropriate management within these areas.

Page 209 under National Parks change the name of Ballycroy to Wild Nephin Ballycroy National Park. Also, it is noted that Cavan – Burren may not be an official National Park as designated under IUCN.

### **Chapter 6 – Connectivity**

Policy Objective 105 should be split into two separate objectives relating to airports and seaports/harbours. Furthermore, the potential to support tourism activity within the seaports/harbours should be recognised in the objective.

Strengthen Regional Policy Objectives 122, 123 to also cater for the needs of visitors

Insert a new Regional Policy Objective under the Rural Transport section supporting the Local Link Rural Transport Programme throughout rural areas of the Region and ensure that the network includes tourism objectives with the potential to serve key tourism sites.

### **Chapter 7 – Quality of Life**

A Regional Policy Objective should be included in this chapter to facilitate the development of good quality sports and recreation facilities, including networks for walking, cycling and other activities.

### **Chapter 8 – Infrastructure**

Guiding principles should be added to the Energy Infrastructure section to allow Local Authority Development Plans to facilitate the provision of energy networks. The guiding principles should include at least the following;

- The design is such that it will achieve least environmental impact.
- Regard is had to any future National Landscape and/or Seascape Character Assessment in the development planning and implementation of energy networks/infrastructure.
- Where impacts are inevitable mitigation features have been included.

Insert a new Regional Policy Objective on page 278 which ensures that any potential impact upon tourism in the development planning of energy networks/infrastructure must be considered and tourism resources should be protected through the appropriate and sustainable planning and design of transmission infrastructure.