

Department of Housing,
Local Government and Heritage,
Custom House, Dublin 1,
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By Online Consultation Portal

12th September 2024

Public Consultation on the Draft Revision of National Planning Framework

A Chara,

As the National Tourism Development Authority, Fáilte Ireland's role is to support the long-term sustainable growth in the economic, social, cultural and environmental contribution of tourism to Ireland.

Fáilte Ireland welcomes the publication of a draft first revision of the National Planning Framework (NPF) for public consultation. We note that the Draft Revision of the NPF focuses on the need to update the Framework (introduced in 2018) in order to appropriately reflect changes to Government policy that have taken place since its initial publication six years ago, such as climate transition, regional development, demographics, digitalisation and investment and prioritisation.

Context of Submission

Fáilte Ireland made submissions in 2017 & 2018 as the National Planning Framework was being formulated. As part of our original submissions, we identified five key enablers to where and how alignment between tourism and the NPF could be best be achieved. We also identified where possible and appropriate, policies and projects, which might support this alignment. Fáilte Ireland acknowledges that the NPF is a high-level document, and that further detail is provided through the subsequent plans which stem from this Framework such as the Regional Spatial and Economic Strategies (RSEs) and Metropolitan Area Spatial Plans (MASPs). However, these plans will take their lead from this revised NPF and therefore it is vital that the

information contained within the updated NPF is accurate, up to date and representative of the tourism sector in Ireland.

It is to this end that we have prepared this submission with the aim of ensuring that the revision of the NPF takes account the needs of tourism and ensure alignment of stakeholders (all key National, Regional and Local, including State bodies and State-owned enterprises) to support the cross sectoral implementation of the NPF. We look forward to engaging further with the Department of Housing, Local Government and Heritage in the preparation of the updated plan and the implementation of the National Planning framework.

Our submission is set out in the following sections to expand on these key points:

- 1. The Value and Importance of Tourism**
- 2. Contextual Position of Tourism**
- 3. Regional Tourism Development**
- 4. Making Stronger Urban Places**
- 5. Recommendations to the Revised NPF to accurately represent the nature and value of the tourism sector in Ireland**

1. The value and Importance of Tourism

Tourism is one of Ireland's most important industries, contributing to the economic and social fabric of the island. It is a leading creator of jobs and revenue, and one of the few sectors that has the potential to significantly benefit remote rural areas. While traditional tourism statistics focus primarily on 'flows' (i.e., the number of visitors, the number of overnight stays, etc.), Gross Value Added (GVA) measures the overall contribution of a particular sector to national income. Tourism activity in Ireland is associated with over 4% of direct GVA. Because tourism is characterised by the fact that consumption takes place where the service is available, and tourism activity is frequently concentrated in areas which lack an intensive industry base, it is credited with having a significant regional distributive effect.

An essential element of the economic impact of tourism in a public policy context is the sector's contribution to Exchequer revenue. Total combined annual tax take from tourism activity was estimated at close to €3bn pre-pandemic, with VAT being the single most important source, followed by taxes on income. This estimate is based on the direct, indirect and induced impacts.

Tourism is a significant component of the Irish Economy – as a revenue generator and as an economic driver. The Central Statistics Office (CSO) now produces an alternative method of

estimating employment from the traditional Labour Force Survey (LFS). Tourism Industries' employee headcount was estimated to be c.226,000 in Q2 2024.

While there are significant environmental sustainability challenges to be overcome for tourism, we must not lose sight of the hugely beneficial role that tourism plays in our nation and globally. Tourism is key to the wellbeing of visitors, host communities and the world at large.

1. Tourism enriches the lives of visitors through enhancing mental and physical wellbeing through rest, rejuvenation, exercise, new human connections and education.
2. Tourism enriches the lives of our communities through providing a significant quantity, quality and diversity of employment; supporting the development of better places to live; encouraging the protection of natural, built and cultural heritage; and increasing understanding of, and connection to, people from diverse backgrounds.
3. Tourism serves our global community by increasing global understanding and building global connections which are the bedrock of global trade, global cooperation, global aid and global peace.

It is Fáilte Ireland's vision that by 2030 the tourism sector has further developed as an economically resilient, regionally dispersed industry that delivers on its climate action targets, consistently provides excellent satisfaction to all visitors, excellent careers to staff, and significant contributions to local communities, supported by coordinated and collaborative, sustainable destination development by national and local state bodies.

2. Contextual Position of Tourism

A flourishing tourism industry is vital for Ireland's economic well-being and future growth. It also shapes our image and attractiveness as a great place to live, work and invest. There are many synergies between the key drivers for the First Revision of the NPF as highlighted in this consultation and the contextual position of tourism in Ireland currently.

Key Driver for The Revision of the NPF	Contextual Position of Tourism
Climate Transition – addressing sectoral emission targets	The climate action targets most relevant for tourism are those for Commercial Buildings (45% reduction vs. 2018 by 2030) and Internal Transport (50% reduction).

Population Demographics – planning for uncertainty.	Currently international predictions are for stronger demand growth over the coming years.
Regional Balance – the reality of regional ambition and the challenge of transitioning from ‘business as usual’.	Tourism in Ireland is still very unevenly spread regionally and seasonally. Dublin & Southern Wild Atlantic Way account for ca. 20% of land mass but over 50% of tourism revenue.
Digitalisation – Impacts on work, retail, commuting and regions.	Digitalisation broadens the demands on the tourism sector in terms of how it adds value to Ireland. Tourism has a key role to play in the quality of life for all residents in host destinations through improving the area as a place to live as well as visit.
Investment and Prioritisation – Timing and Prioritisation.	Capacity planning is critically important for tourism to support the development and delivery of exceptional and Inclusive visitor experiences and accommodation which meet the needs and expectations of visitors. Our main Cities and Towns should make provision for tourism development.

Capacity Planning

Capacity planning is critically important for tourism to support the development and delivery of exceptional and inclusive visitor experiences and accommodation which meet the needs and expectations of visitors. It is important to recognise that the need for increased capacity is apparent throughout Ireland, spanning cities, towns, and villages. It is important to emphasise that these constraints existed in accommodation existed pre-pandemic, and before the onset of the war in Ukraine. However, the capacity constraints are further exacerbated by the substantial quantity of tourism accommodation stock currently under contract and the anticipated Short Term Let Register. This highlights the urgent need for additional development and a favourable investment climate to support accommodation development and tourism growth. In relation to tourist accommodation, the expected growth in visitor accommodation demand, projected at approximately 3% annually, highlights the need for attention.

Fáilte Ireland acknowledges the critical need to address the housing issue and the delivery of housing in Ireland, however it is crucial that national planning policy strikes a balanced approach to capacity planning for both sectors. By addressing both needs holistically, we can meet the essential housing needs of our society, while also sustaining the growth of our tourism industry. This joined approach would not only stimulate economic growth but also enhance the social fabric and cultural vitality of our cities, towns and villages, creating a more inclusive environment for all.

Favourable Investment Climate

Clear and strategic planning for future tourist development is crucial to attract investment from both domestic and international investors. By establishing a structured growth plan, we can reduce uncertainties and create a favourable investment environment. Investors are more likely to commit resources when they see a well-defined roadmap for growth, which ensures that their investments will be supported by robust policy frameworks and a commitment to sustainable development. An increase of tourist accommodation investment would further amplify the positive impacts that the tourism industry has on the local economy, driving innovation and enhancing the overall quality of the tourism experience in Ireland.

National planning policy has a critical role to play to ensure tourism is attractive to private sector investment and facilitate investment to improve the attractiveness and sustainability of the tourism offering, while balancing these in the wider context of sustainable planning and development.

3. Regional Tourism Development

Since the adoption of the NPF, the Ireland's Hidden Heartlands brand was launched in response to a need for a distinctive tourism brand proposition for the Midlands that was differentiated from both the Wild Atlantic Way and Ireland's Ancient East. Along with the Dublin brand, collectively the four Regional Experience brands comprise a strong suite of differentiated themed regional propositions to market under the umbrella of Brand Ireland.

Fáilte Ireland's ambition is to develop Ireland as one of the most sustainable tourism destinations in Europe. To drive this ambition, it is seeking to achieve a national annual average revenue growth rate of 5.6% and will focus on developing regions and off-peak months growing revenue faster than the national annual average. Focusing on ensuring Regionality and Seasonality across the tourism sector will prioritise revenue over volume, making sure the revenue is spread more evenly throughout the year.

In 2023, Fáilte Ireland launched four Regional Tourism Development Strategies each providing a 10-year vision and a five-year action plan for development in each region (the Wild Atlantic

Way, Ireland's Ancient East, Dublin and Ireland's Hidden Heartlands) and provide the blueprint for sustainable tourism development in the regions ensuring our stakeholders and partners can work together towards a shared vision. Each Strategy is informed by planning policy (the National Planning Framework (NPF), Regional Spatial and Economic Strategies (RSEs) and lower tier Development Plans and Local Area Plans). They set out a strategic approach to unlock the commercial potential of each region, while protecting the environment, enhancing the lives of local communities and serving the needs and expectations of our visitors.

It is considered that Fáilte Ireland's Regional Tourism Development Strategies should be referenced in section 3.1 Strategic Development of Ireland's Regions. They should also inform updates to the detailed sections on high level planning and place-making policies and enablers to help shape the strategic development of the various regions as set out in sections 3.2, 3.3 & 3.4 in relation to tourism development needs including the need to develop vibrant towns and villages, accommodation, transport and access. Therefore, a strong alignment between regional tourism development priorities and planning policy through collaboration between the tourism industry, Local Authorities, state agencies, private enterprise and community groups will achieve a shared vision for tourism in the regions.

(see appendix 1 – Fáilte Ireland Regional Experience Brands Map)

4. Making Strong Urban Places

As with the adopted NPF we note that the revised framework fails to make any reference to tourism in an urban context. Our main cities and key towns are important tourism hubs in their own right. For example, tourism is undoubtedly amongst Dublin's most important indigenous economic sectors. Nationally Dublin accounts for just over half of all overseas visitors to Ireland. Tourism pre pandemic revenue was almost €2.6bn in 2019, over 80% of this coming from international tourists. Dublin is a key access point for the island of Ireland and as such it is often the first and/or last experience visitors have of the country.

Overseas visitors are accustomed to visiting well-maintained and preserved, attractively presented and historically interesting cities and towns in their own and other countries. They expect to find similar experiences in Ireland - places that are distinctive in terms of character, architecture, public realm and green spaces as well as having vibrant centres. They hope to enjoy our cities by exploring on foot, absorbing the atmosphere, sitting and watching the world go by, learning about our unique culture and history, and participating in some of what they enjoy doing during leisure time including eating good food, sharing good company, shopping and attending live performances.

Therefore, the planning and delivery of URDF and privately funded projects must be multi-faceted and facilitate tourism infrastructure and projects in equal measure. Quality urban design and architecture should facilitate vibrancy and animation throughout the day and night, and this can be achieved through creative design and multi-functional use within buildings and public spaces including green and blue which encourage a broader mix of uses. This will increase the cities and towns of Ireland ability to maximise the economic benefits of across multiple sectors including tourism. Ultimately, places that are pleasant to work and live in tend to be vibrant and interesting and therefore attractive to visitors.

Fáilte Ireland welcomed the launch of the Town Centre First policy in 2022 which aims to tackle vacancy, combat dereliction and breathe new life into our town centres. While it primarily applies to Ireland's rural towns it is equally applicable to challenges facing our larger towns and cities. There is a significant tourism opportunity for Irish towns;

- Visitors bring in direct expenditure into towns
- Tourism expenditure increases incomes and employment, both directly in tourism enterprises and indirectly among many suppliers.
- Increased economic activity leads to increased investment.
- Tourism contributes to the creation of more attractive and vibrant towns for the entire community, providing the impetus for towns to preserve/repurpose heritage infrastructure and to invest in refreshing a town's appearance.
- As a result, tourism can also assist in addressing a number of challenges faced by communities and planning authorities, including the loss of community, declining economies and under-used town fabric.

It is considered that revision of the NPF should place a stronger emphasis on the utilisation and upgrading of existing infrastructure, such as converting underused sites or derelict buildings, greater use of upper floors of buildings for various uses including residential, and tourism use e.g variety of accommodation offering. Not only would this approach address vacancy and the attractiveness of our towns, but it would also support compact growth and contribute significantly to the vibrancy and sustainability of towns.

Night - Time Economy

Developing the night-time economy is an important aspect of ensuring a vibrant city and town experience and entails developing a bar and restaurant culture, while also encouraging different activities, in particular cultural experiences, through longer opening hours that appeal to a broader range of people.

The night-time economy needs to be carefully managed to ensure a balance which does not negatively impact the public. However, there are many ways in which vibrancy can be added to cities and towns throughout the evening and night-time including facilitating rooftop/outdoor

dining, extended hours of opening for retail, greater utilisation of our waterside spaces and allowing for more music and cultural venues. A diverse range of indoor attractions can add to the night-time economy in our cities and towns and the provision of accommodation also has a positive impact on the night-time economy as it converts day trippers to overnight stays.

It is recommended that the Night – Time Economy be referenced in section 4 of the NPF as a key component and lever of economic and social prosperity in our urban areas.

5. Recommendations to the Revised NPF to accurately represent the nature and value of the tourism sector in Ireland

In addition to the commentary and recommendations outlined above, it is vital that the information contained within the revised NPF is both accurate and representative of the tourism sector in Ireland. We note that very little if any text changes have been made to the tourism section as set out in section 5.4.

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.

As highlighted at the outset of this submission, tourism has a strong economic value which should be adequately represented and appreciated in the development of national policy. **We therefore recommend that the wording for the tourism section of chapter 5.3 be updated to ensure an appropriate approach to future tourism spatial planning.**

Changes to National Policy Objective 31

The current wording states that the objective is to... *Facilitate the development of the rural economy, in a manner consistent with the national climate objective, through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting biodiversity and 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*

*in a manner consistent with the national climate objective, through supporting a sustainable and economically efficient agricultural, food and **tourism** sectors, together with....*

Changes to National Policy Objective 35

We note that the policy objective has not been materially revised since the adopted framework and states... *Continue to facilitate tourism development and in particular the Strategy for the Future Development of National and Regional Greenways, and a Blueways and Peatways Strategy, which prioritises projects on the basis of their environmental sustainability, achieving maximum impact and connectivity at national and regional level while ensuring their development is compliant with the National Biodiversity Action Plan, the national climate change objective and requirements for environmental assessments.*

We welcome the aim of the objective to facilitate tourism development. However, it calls out a strategy that has been in existence since July 2018 and references a Blueway and Peatways Strategy that are not in existence in the format or title/status afforded in the objective. This policy objective should be broader and provide for the wider tourism sector in lieu of calling out specific elements which are not fully representative of the wider tourism sector. **Therefore, this policy objective should be reviewed and reworded accordingly to ensure it is robust and fully accounts for the needs of the wider tourism sector currently and into the future.** A recommended revised wording is provided below;

Continue to facilitate sustainable tourism development and investment through the delivery of high-quality visitor accommodation, attractions, activities and infrastructure, achieving maximum impact and connectivity at national and regional level while ensuring their development is compliant with the National Biodiversity Action Plan, the national climate change objective and requirements for environmental assessments.

Making a Just Transition

It is noted that this section refers predominantly to energy development and the potential of the peatlands to facilitate the generation of energy, most notably wind/biomass. Under the EU Just Transition Fund, Fáilte Ireland has been tasked with the administration of €68 million for a Regenerative Tourism and Placemaking Scheme 2023-2026. Through this scheme Fáilte Ireland will invest in the sustainable development of tourism in the Midlands with the aim of diversifying the regional economy by creating jobs, supporting habitats and biodiversity and sustaining communities.

There are two main elements to the overall scheme:

1. €38m towards the diversification of the regional economy through the sustainable development of tourism;
2. €30m towards the regeneration and repurposing of peatlands through the development of a network of trails.

Key priorities under Fáilte Ireland Regenerative Tourism & Placemaking Scheme for Ireland's Midlands are to;

- Generate employment for former peat communities by investing in tourism and the diversification of the local economy and
- Support the regeneration and repurposing of peatlands and related land.

It is considered that this section should be reviewed to highlight and acknowledge the role that tourism can play in climate transition in the context of the Eu Just Transition fund (EUJTF).

Conclusion

Fáilte Ireland welcomes the publication of the Draft first revision to the National Planning Framework. Fáilte Ireland is eager to ensure that the tourism sector is recognised within the revised NPF for the value it currently delivers to the Irish economy and for the extent to which it can continue to contribute to the sustainable development of both urban and rural Ireland over the remainder of the framework.

We have highlighted above in the boregognisedy of our submission many updates which we feel are considered necessary to accurately reflect the contextual position of tourism at this point in time and in the longer term towards 2040. The tourism sector continues to be a significant player and economic engine in many cities, towns and villages right across Ireland. Tourism has the capacity to continue to directly and indirectly sustain communities, create employment and deliver real social benefits for rural Ireland.

We therefore recommend that the suggested additions and changes to the text which refers to tourism is addressed now in the Draft Revision of the National Planning Framework, so that the new plans/strategies and reviews of the three Regional Spatial Economic Strategies which will follow from this revised framework for development continue to be adequately informed and take due consideration of tourism as one of the most important and indigenous economic sectors in Ireland.

If further information is required on any of the detail of this submission, please do not hesitate to contact Fáilte Ireland as per details below:

Yours Sincerely,

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Appendix 1 – Fáilte Ireland Regional Experience Brands – Map

