

COUNCIL FOR NATURE CONSERVATION AND THE COUNTRYSIDE

An Advisory Council to the Department of the Environment

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Via email

Sharon Smyth
Tourism Policy
Department of Enterprise, Trade and Investment
Netherleigh
Massey Avenue
Belfast
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Dear Ms Smyth,

A DRAFT TOURISM STRATEGY for NORTHERN IRELAND to 2010

CNCC welcomes the opportunity to comment on this important draft Strategy, and members have given the issues considerable time and thought. Several of us also attended the 'Roadshows' around the country and contributed to the debates on those occasions. The following response has some general comments on the Strategy and then attempts to answer the five specific questions that were posed. We note that the questions in the document are not quite identical to those presented at the 'Roadshows', and would like to stress that these responses are to the latter questions.

The supporting document states in Para 4.2; "At the heart of the discussions was a debate about sustainability. The desire is to grow but to 'grow carefully'." Council agrees with this statement, but believes it does not go far enough. The real issue is the sustainability of any tourism, with issues such as minimising the impact on the natural world and maximising the use of renewable resources to the fore. We believe that there needs to be greater recognition of the possible effects of climate change and of the possible constraints placed on travel by the future costs of energy. The mention of green travel and eco-tourism needs to be developed and the implications more clearly thought out. It is felt government has a major role to play in providing leadership by example and also facilitating stakeholders' development in these areas. Consideration should be given to implementing a suitable quality assurance scheme.

CNCC welcomes the recognition that NI needs to 'value what the Tourist values', with the explicit statement that 'this means protecting and enhancing the built and natural environment for the benefit of future visitors and residents'. Similarly we welcome the 'desire to protect the qualities that make Northern Ireland special and unique'. Under the section "Creating the new NI experience" there is ambition to "Exploit the potential of food, drink and local products to enhance the experience" of products and places. It is felt this is a key point, but there seems scant recognition that those products must be of superior quality to achieve this and the link to the naturalness of the environment ignored. There needs to be focused development to grow both brand recognition of high quality products while demonstrating sustainable use of resources and the environment.

The formation of the Steering Group at Annex E is welcomed. However, it is disappointing to note the heavy bias of the membership towards the Belfast area, which sends out the message that this is another strategy being imposed from Stormont. Every effort must be made to make the membership as inclusive as possible.

Comments on the specific questions;

Question 1

The preferred **ambitious growth** option (4.2) is supported and the recognition of its dependence upon protection of our natural assets and the environment is most welcome. However, there needs to be wider recognition by all involved of the broad array of factors that contribute to the character of Northern Ireland's landscape and environment.

There is concern over the ability of NI's travel infrastructure to deliver on reaching this target. The current system is disjointed and makes movement around the Province difficult, particularly via the entry points of Larne and Belfast International Airport, which force visitors to be too reliant on car hire. More could be done to promote off-season activities and facilities and opening hours need to improve to attract visitors. In particular, the difficulties over access to the countryside are a particular barrier to development. There is a real need for a far-reaching discussion of the issues surrounding access to the countryside which this strategy should seek to stimulate. Development and marketing of the natural environment along the lines successfully achieved in Scotland should be considered, particularly given that half the NI top ten most popular attractions are intimately associated with it!

We agree with the aim to earn more from visitors, and particularly welcome the concept of making better use of natural resources. However we believe that this often does not require the sort of development and investment that are suggested or implied by this strategy. The best ways to encourage greater spend is to encourage longer stays, which can be achieved by offering a wide range of activity-based holidays, such as angling, walking, wildlife, archaeology and history tours. Most of these depend on the natural resources that we have already, needing little development or financial investment. Golf could also fit into this category, and we have many fine existing golf courses in superb locations, but this document repeatedly talks of the creation of a new 'links golf course', which would not be uniquely Northern Irish (most modern golf courses are much the same the world over), would cost vast sums and would inevitably damage existing valuable landscapes and natural habitats. The experience of golf resorts in the Republic of Ireland should be taken as a warning.

With regard to investing in development we believe that often the first priority is in the protection and conservation of these natural attractions. This may not require vast sums of money, but will need commitment and determination. The Table on pages 4-5 clearly sets this out under the aim to 'Demonstrate commitment to taking care of the environment'. However other statements in this table (and elsewhere) appear to contradict or cut across this commitment. These include 'create an environment that encourages entrepreneurs and developers', 'commit to high quality destination development' and 'establish a partnership with planning to deliver high quality development'. These should be qualified by a statement that these aims should not be delivered at the expense of our natural and built heritage – what makes NI special and unique. At times this strategy seems to make a presumption that development must be good for tourism, to the extent that tourist development should get a fast track through the planning system. Great care must be taken to stress that this development should be appropriate and sustainable, and the proposed PPS should reflect that clearly.

Question 2

It would seem the potential for environmental tourism has been rather under-emphasised in the strategy, both in terms of attractions such as our geological features or wildlife and also the sustainability of the accommodation. The natural environment is generally not well understood by tourism industry operators, so resources need to be targeted at improving their knowledge and particularly directed towards encouraging information exchange. Furthermore, the opportunity to encourage sustainability of the industry by developing a suitable "green" kite-mark for qualifying venues should be examined, as this is a market sector that is likely to increase.

While the success of the current NIRD funding strategy is acknowledged, it is felt there is a need to better integrate EU-funded projects into the strategy in the short-term. In particular, government needs to take care that any Comprehensive Spending Review does not affect match-funding, as this would have a disproportionate impact on the strategy. In the longer term, changes to EU funded structural programmes after 2013 offer both an opportunity – through increased emphasis on sustainability – and a challenge because of reduction in funding levels. It is suggested that a special group be established to report to the steering group on this particular issue in the run up to 2013.

One particular area of Partnership that is specifically mentioned is the relationship between the tourism sector and planning. We recognise the importance of this, but would stress again the need for development to be appropriate and sustainable. The PPS should provide the framework to ensure sustainable tourist development while protecting the environment, and crucially should ensure consistency of approach across the province. Post-RPA planning will become the responsibility of local government, and there will be the potential for very different approaches in different areas, potentially undermining NITB efforts to market NI as an entity. (See Question 4 for other issues around RPA)

Question 3

As already pointed out under Question 1, access to the countryside is a barrier to successful development of the full potential of what NI has to offer. In particular, the legal issues around public liability need to be overcome if landowners are to be fully involved in the strategy.

Question 4

In examining the delivery issues, it is unclear how development of the proposed Tourism Area Plans would operate post-Planning Reform in April 2011, let alone post-RPA if that happens. There is a need to make sure such tourism plans will integrate with the new Area Plans and this will only be achieved if resources are specifically allocated to development of skills for all concerned. Such funding is an essential investment and should be protected from cuts. The lesson from the current LAG structure needs to be noted, in that it is a barrier to cooperation across wide areas such as Lough Neagh, as differing priorities and interpretations hamper development. It is also noted that there is no mention of the border Regional Authorities; it is felt essential that they be brought into the Tourism Area Planning process, but unclear how this will be achieved.

Question 5

The whole issue of National Parks and AONBs as a product seems to have been given very little attention. Whilst the priority of enabling legislation for the former is mentioned, the opportunities associated have been largely ignored, which is surprising, since they align extremely well with the general thrust of the strategy. The contribution to tourism from these areas has been well documented in the other administrations and to ignore them here is to miss a golden opportunity to enhance the product offered by NI to attract visitors. However, it is vitally important that both National Parks and AONBs are differentiated from the wider countryside not just by a line on the map but by binding and effective mechanisms that protect and enhance the qualities for which they are designated. Landscape designations without teeth will only devalue the concept and visitors will rapidly lose interest in them.

Yours sincerely



**PATRICK CASEMENT
CHAIRMAN**