

Draft Tourism Strategy for Northern Ireland: 10 Year Plan

Comments by

Northern Ireland Environment Link

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Northern Ireland Environment Link (NIEL) is the networking and forum body for non-statutory organisations concerned with the natural and built environment of Northern Ireland. Its 69 Full Members represent 190,000 individuals, 262 subsidiary groups, have an annual turnover of £70 million and manage over 314,000 acres of land. Members are involved in environmental issues of all types and at all levels from the local community to the global environment. NIEL brings together a wide range of knowledge, experience and expertise which can be used to help develop policy, practice and implementation across a wide range of environmental fields.

NIEL welcomes the opportunity to respond to this consultation on a Tourism Strategy for Northern Ireland. These comments are made on behalf of Members, but some members may be providing independent comments as well. If you would like to discuss these comments further, we would be happy to do so.

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NIEL's feedback on the consultation on a Tourism Strategy for Northern Ireland is at a strategic level and is primarily focussed on what additional considerations and/or actions might be necessary above and beyond those contained within the draft Tourism Strategy. As such, NIEL's feedback addresses question 6 in the consultation.

Q6 Based on your responses to the above questions, do you have any further comment on the Strategy as a whole? i.e. Is there anything missing? Is it taking the industry on the right for current and future challenges/path opportunities?

Overall, there are some important elements missing from this draft, primarily in relation to the role for sustainability in the draft Tourism Strategy, which, despite the Vision for the strategy outlined on page 4, is not at the core of the strategy. For example, the targets outlined on page 77 in the 'Sustainability' section are vague and not SMART. This is noticeably different to the targets in the 'Innovation' or 'Inclusive' sections which give percentages, for example for the increase in R&D expenditure, and target dates.

The first two of the 10x Tier 1 Targets on page 77 (80% electricity consumption from renewable sources and greenhouse gas emissions 48% lower than baseline) are targets in the [Climate Change Act \(Northern Ireland\) 2022](#), in Part 1 section 15 and Part 1 section 4 respectively. As such, these targets in the draft strategy do not represent anything beyond the legal obligations that already apply to the Department. The target to "Double the size of NI's low carbon and renewable energy economy to more than £2bn turnover" is an existing target from the NI Energy Strategy "[The Path to Net Zero](#)" (page 7), though significantly the target date of 2030 given in the Energy Strategy is not included in the draft Tourism Strategy. NIEL believes if the target in the NI Energy Strategy is to be met then it needs to be met within the previously established timeframe (by 2030). The rationale for the omission of the deadline for this target in the draft Tourism Strategy is unclear. While the integration of relevant targets from other strategies and legislation is a good thing, it is something that should happen as a matter of course, but in this case, the targets do not represent anything new or additional or any higher level of ambition than that already placed upon the department. Moreover, the absence of the established target date in the draft Tourism Strategy for the doubling in size of the low carbon and renewable energy sector in NI in effect means the Tourism Strategy target fails to match the existing Energy Strategy target. In that context, the lack of ambition and lack of detail in these targets from the department is disappointing.

For NIEL members it is essential that all energy-related targets, in addition to being SMART, must also include the caveat that all actions to advance renewable energy targets set elsewhere in legislation must be delivered in harmony with nature. The [Intergovernmental Panel on Biodiversity and Ecosystem Services](#) (IPBES) and the Intergovernmental Panel on Climate Change (IPCC) [Sixth Assessment Report](#) make it clear that the nature and climate emergencies are indivisible. Given the relationship between these two issues, it is therefore essential that we pursue an integrated and joined-up approach to tackling these twin emergencies in a way that will ensure that actions taken to address one issue will not exacerbate the problems of the other. As the IPBES 2021 report on Biodiversity and Climate Change says¹

“The mutual reinforcing of climate change and biodiversity loss means that satisfactorily resolving either issue requires consideration of the other.”

NIEL believes that the department should set SMART targets for the tourism industry in relation to sustainability with an overall aim to reduce the ecological footprint of the sector/industry. This may require a more accurate measurement of the ecological footprint of the tourism industry in NI. For example, the greenhouse gas emissions of the tourism sector/industry could be reduced by increasing the provision of reliable, public transport across NI, especially to points of interest for tourists. This should include improving the quality of accessible information for tourists in relation to public transport, in different languages and formats for those who may have a hearing or visual impairments.

If sustainability is to be at the core of the Tourism Strategy as stated in the Executive Summary on page 4, then the department should ensure that there is input from a representative or representatives with sustainability experience and expertise in the development and implementation of this and future tourism strategies. This should actually have happened in the development of the current draft strategy. NIEL would be willing to work with the department in relation to ensuring sustainability is at the core of the tourism strategy. NIEL had previously suggested, in 2020, that an environmental expert should be included in the Economic Advisory Group established by former Minister Dodds as part of the Green Recovery work undertaken by the Department. NIEL met with departmental representatives to discuss this further but understands that this was not progressed by the department. The need for more environmental expertise in the development of policy remains.

NIEL also believes that the role of nature and our protected areas, on land and in the sea, has not been appropriately accounted for in this draft strategy. The importance of our natural and built heritage for tourism is illustrated by the fact that of NI's top ten visitor attractions in 2022, four were heritage based. According to the [NISRA NI visitor attraction survey 2022](#), the second most visited attraction in NI was the Derry walls, which attracted 577,000 visitors, third was the Giant's Causeway with 422,000 visitors, sixth was the Guildhall in Derry and Strabane District Council with 321,000 visitors and tenth was Mount Stewart with 215,000 visitors. In particular, the importance of our marine and coastal locations for tourism and leisure does not appear to have been fully appreciated. This is another shortcoming of the draft Tourism Strategy which could potentially be addressed by greater consultation and input from those with sustainability expertise, as referred to above.

The considerable economic value of Northern Ireland's environment was highlighted in the 2007 report "[Valuing Our Environment](#)" which found that economic activities related to the environment of Northern Ireland contributed £573 million to the regional economy and supported 32,570 full time equivalent (FTE) jobs. There is however potential to generate much more income and create more jobs in this sector. For example, research by Buchanan and partners (2006)² predicted that by 2020, a Mourne National Park could generate an additional £81m per annum in tourism revenue and support 4700 additional jobs within the park boundary and surrounding areas – the “sphere of influence” of the Mourne AONB. NIEL believes there is great potential for our natural and built heritage to play a more prominent

role in the tourism and leisure sector but this needs to be properly managed. However, this potential is not being maximised. Instead, the opportunities to expand and improve the offering for tourists are often missed or hindered by a lack of investment in our natural environment and related infrastructure. For example, total central and local government support to the Mourne Heritage Trust, as the lead landscape management body in the Mournes, has recently risen to approximately £750,000 per annum. This contrasts with similar areas in Great Britain where National Park Authorities have budgets in the region of £7,500,000 and upwards. Combined with historic under-investment in relevant infrastructure in our rural areas such as public transport and access to the countryside, as well as other services such as countryside rangers, this does not provide a sound basis for a focus on landscape and related heritage based tourism growth.

NIEL agrees with the statement on page 5 of the Strategy that

“The vision and mission of the Strategy can only be realised by businesses, communities and regional and local government working together in a truly collaborative approach”.

However, feedback from members was clear that the draft Strategy did not appear to grasp the detail of the scale and nature of the task of actually ensuring that level of collaboration nor provide sufficient details as to how that could be achieved. There is a need for a much more integrated approach to tourism than has been evident thus far.

The Strategy does not appropriately address the challenges facing landscape management bodies in terms of the policies and legislation that support their work to provide responsible and sustainable opportunities for visitors to engage with our natural resources. While legislation and policies on access to the countryside, occupiers' liability and landscape management have been updated in other parts of the UK and Republic of Ireland, Northern Ireland's legislation and policy framework that could support increased tourist activities is wholly inadequate and out of date. While there is information on how the department will want to work with DAERA through collaboration, there is no mention made of the need for changes as outlined.

NIEL is concerned that the focus of infrastructure development on page 47 of the draft strategy makes no mention of the significant lack of infrastructure to support access to the natural environment. There are around 33,000km (20,750 miles) of public rights of way in [Wales](#) and only a few hundred public rights of way in NI. The path network in the Mournes is managed in piecemeal fashion as and when bodies like the Mourne Heritage Trust can access funds and there are areas facing major impacts from erosion. Access in the Sperrin AONB is extremely limited and NIEL members have described access in Binevenagh AONB as having been blocked and made challenging by DAERA. The potential for a coastal path in NI was removed from the Marine Bill but potential for a coastal path was included in the legislation for England and Wales.

One of the main challenges in opening up the countryside for visitors is concerns with the current Occupiers Liability legislation. This is regularly raised by landowners, including government departments, despite evidence to show that it is more a matter of perception. However in the Republic of Ireland the legislation was amended in 2023 to reduce concerns and provide a higher regard for the “volenti” principle whereby responsibility rests with the user.

As things stand, the aim to connect more visitors with our nature and landscapes is worthwhile but extremely challenging and inadequately addressed in the draft strategy.

The provision of public transport to our special landscapes is also very limited, which creates an increased reliance on car access, which is unsustainable and a problem in itself. Innovation needs to consider and come up with a means by which visitors can access our landscapes using public transport that is reliable and regular. We can learn from the experience of others, such as the [Sherpa service in Snowdonia](#).

The Strategy also highlights that

“Visitors like being active in the outdoors or exploring the countryside; from the freedom of the outdoors whether through land or water-based activities to immersive attractions”

The strategy makes no mention of accreditation schemes to ensure that providers operate in safe manners or in ways that minimise impacts on our natural environment. Schemes such as the [WISE scheme](#) or [Leave No Trace Awareness](#) are extremely important in ensuring that activity provision is done in sustainable and responsible ways. Furthermore, there are significant safety concerns with the activity provider sector in NI. In other parts of the UK, it is a legal requirement to have a license to operate as an activity provider (within certain parameters). While [the legislation for this is live in NI](#) it has never been implemented. There is no emphasis on quality assurance especially for those operators who take clients into more remote or challenging natural environments.

While the references to Crumlin Road Gaol and Hotel Killeavy Castle are welcome, the importance of built heritage assets is not adequately addressed in the strategy. NIEL believes the Tourism strategy should include a target for the sustainable reuse of built heritage assets, particularly those at risk, for tourism purposes.

NIEL is concerned that in the paragraph on page 43 in relation to “Sustainable Tourism” there is no real evaluation of how tourism is to be more sustainable, but an argument that

“given the rising costs facing tourists and businesses, the economic aspect of sustainability is now more crucial than ever”.

This paragraph appears to lack balance and to put economic interests above others when considering sustainability, which would be an inappropriate step. This also suggests a lack of understanding and appreciation of how tourism could and should be more sustainable and is another reason why NIEL believes that the draft tourism strategy needs greater input in relation to sustainability, as previously outlined.

Similarly, in the paragraph on “Sustainable Market Connectivity” on page 46 and on page 59, the draft strategy admits that there is a heavy reliance on air travel for both business and leisure travellers to and from NI but does not explain how this reliance will be managed in coming years. Given that on page 60 the draft strategy says that “Sustainability will be at the heart of Tourism, we will develop and manage tourism effectively and responsibly.” and that one of the indicators for a greener and more sustainable economy is “Support tourism businesses towards becoming carbon neutral.” the question of how travel to and from and within Northern Ireland is to be managed, remains to be properly addressed in this draft strategy. There is clear evidence that air travel produces significantly more carbon emissions than surface travel. For example, according to the [UK Department for Energy Security and Net Zero](#), a UK domestic flight produces an average of 272 grams of Carbon Dioxide equivalent per kilometre (g/CO₂ eq/km) per passenger whereas a foot passenger on a ferry produces 19g/CO₂ eq/km per passenger. Therefore, NIEL believes that there should be an innovative approach to the development and economic viability of ferry travel and associated public transport links. The lack of airline fuel tax makes it impossible for surface transport options to compete on an even playing field. If sustainability is at the core of NI’s Tourism Strategy, there should be a strong focus away from long haul flights and air travel in general. The inclusion of the North American market in the priority list, for economic reasons, despite the high carbon footprint which would result from such long haul air travel, suggests that economic concerns are being prioritised over sustainability concerns, which does not appear to fit with the statement that sustainability is at the core of the strategy.

On page 38 of the draft Strategy it says that

“Fundamental to our focus on being a sustainable destination, our emphasis will be less on encouraging more visitors, and more on encouraging our visitors to stay longer, consume more tourism product thus spending more”.

If tourists can be persuaded to spend longer in Northern Ireland then that would undoubtedly generate more income while potentially also creating more pressures. It is likely to be a challenge to manage all the implications of the above emphasis on longer stays but no detail is provided in the draft Strategy as to what approach the department and/or Tourism NI intends to take to manage the pressures likely to be created by longer visitor stays. This is another area where more detail should have been provided by the department and once again emphasises the need for input from a representative or representatives with sustainability experience and expertise in the development and implementation of this and future tourism strategies.

-ENDS-

¹ https://files.ipbes.net/ipbes-web-prod-public-files/2021-06/20210609_workshop_report_embargo_3pm_CEST_10_june_0.pdf (page 15)

² *Tourism in Mourne-Current and Potential Economic Impact*. Colin Buchanan and Partners Ltd, Countryside Consultancy and Geoff Broom Associates (August 2006)