

## ILDN Response to **Irish Trail 2020 DRAFT Report**

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The *Irish Local Development Network* (ILDN) welcomes the initiative to develop a new national strategy to drive and guide trail development in Ireland and was a keen participant in the early consultation phases. There is much to the document which ILDN can support and is subject to overall approval to actively engage in realising, these objectives. However ILDN has serious concerns with key elements of the strategy as currently drafted and- it must be stated, with the process by which this draft emerged. There has been a significant change in tone and focus from the earlier drafts issued in the spring of 2014. The process by which the draft was developed also gives cause for consideration of the very basic issue of the respective roles of the *National Trails Advisory Council* (NTAC) and *Comhairle na Tuaithe* (CnaT).

**General Critique** Bottom-up local development has long being supposed to be a strategic commitment of the Irish state. CnaT was founded to provide a partnership forum to discuss and hopefully resolve issues pertaining outdoor activity. While there have been undeniable frustrations in CnaT's operation, there has been much progress also. Much of this could be threatened by a move to a top down solution. This is particularly an issue- if the proposed solution does not work and we collectively need to re-engage in partnership with stakeholders who are embittered by that process.

ILDN overall position on the draft is that the document is far too focused on a top-down solution directed by a few stakeholders and with most other bodies subject to their control. It makes the implicit assumption that state agencies are the bodies to drive development and it is simply a matter of providing the resources and/ or legislation. This approach is doomed to fail- as the essence of the trail development paradigm is that no one party has control of all the assets- and thus it requires a partnership. The Draft has no issue with peppering the term partnership throughout the paper- however it fails to persuade ILDN that there is either a clear understanding of what that concept means in the context of trail development or a wish to pursue it. 'Partnership' seems rather to be viewed as a shibboleth which can be addressed by simple inclusion in the text: it is not.

The 'LEADER companies'- now termed local development companies (LDCs) that constitute ILDN were founded to act in themselves as bottom-up local partnership structures. They have a board and organisational structure that means that all elements of social, economic, cultural and environmental stakeholders are represented in the planning and decision making process. LDCs have already contributed much to the 'four tasks of sustainable trail development', *planning, construction, maintenance* and *marketing* of trails. LDCs do possess financial and human resources that can be of assistance to the four tasks- but they also possess other assets, such as their independence from the state's official apparatus, their relationships to their community-landowners, communities, small businesses, etc. Those links can be critical in the development of trails- but the relationships also cannot be taken for granted. Other stakeholders who wish to access or covet LDC resources need to consider the rationale for the LDCs operation and their operational ethos- which is firmly bedded in local partnerships. This draft fails on that account.

If the Irish Trails Strategy is to be a genuine bottom-up partnership, it should by definition be focused on the development of cooperation agreements between willing stakeholders at local level agreeing to collectively share the duties involved in realising their part of the agreed National

template. To address some anticipated criticisms, the bottom-up model is not a weakened development standard - just the opposite: by assigning areas of responsibility and a requirement to report on delivery to that remit, partners will be called to account among their peers. The tasks (planning/ preparation, construction, maintenance, marketing, etc.) will be the same in all regions- the stakeholders can be assigned to tasks and changed if necessary. If they fail to deliver on their duties, those tasks can be reassigned to others willing to take the responsibility.

**Specific Recommendations** ILDN has concerns with the following recommendations:

**Recommendation 2:** *Support local authorities to take leadership in defining and developing local trails in every county and work with communities to develop them.* There are two key concerns of note in this recommendation. There is no reference to partnership approach with the focus on the local authority as the leader of a development process: but leader of who- or what? ILDN members are more than willing to work proactively (and commit resources) on an agreed development strategy. But we have serious issues with be required to execute tasks based on direction without consultation and agreement with local stakeholders.

The second concern plays to that concern in that it references 'legislative change' to enable developments. ILDN (and other NTAC stakeholders) has a series of complex and multifaceted relationships with landowners in their regions and at national level. Those relationships could be compromised by ill-considered legislative changes. More definition is needed as to what is envisaged here.

**Recommendation 11** *Establish an Irish Trails Strategy Implementation Group and assign the Irish Sports Council as the lead agency responsible for coordinating the delivery of the strategy.* There is no pretence that the proposed *Irish Trails Strategy Implementation Group* is anything other than a top down structure, which will have minimum local community input (other than as later proposed in the draft than from the CCMA) to 'direct' trail development- under the guidance of the Irish Sports Council- and presumably the National Trails Office. Where is the evidence that this new body is necessary? The section on the division of roles with CnaT is not persuasive.

**Recommendation 12:** *Establish a new Irish Trails Consultative Forum of users and implementing bodies to provide ongoing input and comment on the implementation of this strategy.* Once again- what is the relationship of the proposed Forum to NTAC and CnaT? Is it an additional body, an overarching body or an alternative ("CnaT-lite") platform? What is the National Trails Office role here? There are a series of important question that need address here.

**Recommendation 13:** *Assign local authorities as the key coordinating body for trail planning, development and management at county level, working in partnership with local development companies, state agencies and community groups.* On its face- the recommendation could be seen to be not without its merits: it at least mentions 'partnership'! But the definition of what constitutes a partnership is the crux of the matter. Why assign any one organisation as the designated coordinating? The reality is that this will be interpreted by other stakeholders as a 'county council function' not a partnership.

This belief will be reinforced by the designation of the *City and County Managers Association (CCMA)* as having a privileged position as the channel between local and national level (led by the National

Trails Office) is also a concern on the degree of partnership envisaged. The CCMA is the representation body of a set of very powerful public servants. If the concept of 'bottom-up' development is to mean anything in this draft, the communities represented by ILDN need to see more detail and evidence of genuine partnership at local level.

### Trail Partnership Structures at County Level

The concept of a 'county trails committee' in the recommendation is interesting and could be taken further if there is the commitment to integrated development. In Kilkenny since 2007, the local authority, sports partnership and *Kilkenny LEADER Partnership* (KLP) - the local development company- with landowner participation have set up a separate non-profit company- *Trail Kilkenny* to drive strategic planning, construction, maintenance, and marketing of all types of trail. A trails development committee convened by KLP with local authority, Fáilte Ireland, Coillte, farming organisations and other stakeholder membership had existed since 2005. The serves the purpose of integrating trails development into the tourism offering and providing an effective channel and control system for Kilkenny's trail development strategy. A separate company may not suit all local scenarios but it has the advantage of ensuring that all stakeholders are assured they are operating from an equal footing.

**Recommendation 15:** *Source funding at local level to deliver and maintain local trail networks.* Once again the concept of 'partnership' is predicted on the local authority acting as the channel for all national funding. LDCs role in the supposed arrangement is set at assisting in the access of EU (presumably LEADER, RSS, RRO, etc.) and "private sector investment" to add to the local fund. ILDN is concerned at the lack of understanding implicit in the recommendations. Despite several attempts to explain the operation of LEADER and other development funds to NTAC members- there remains a view that they can be treated as simply another resource to be pooled for trail development. The implication of this persistent view for the integrity of such funds is an issue that should not only alarm LDCs- but their funding Government Departments and ultimately the European Union.

**Recommendation 20:** *Make better use of existing staffing resources in management of the trails system at county level.* Implicit in the recommendation and others already mentioned- is that all trail development and maintenance staff will fall under the aegis (directly employed or otherwise) of the local authority. Once again the recommendation is based on the premise that the local authority in the natural body to drive local trail development. On the contrary, there is evidence that, whatever the individual commitments and skills of individual members of local authorities, the perception of a project being led by the 'county council' can have negative as well as positive implications.

This is evident in cases of negotiations with landowners- who can have their own complex relationships with other aspects of local government system (planning, roads, etc.) and these factors can influence their response to 'council officials' on Trail development. The actions of Rural Recreation Officers (RROs), Rural Social Scheme (RSS) workers, other non-local authority staff and volunteers within a partnership in such situations can lead to different and often quicker and flexible outcome.

### Western Greenway Partnership

The case highlighted of the work on the Great Western Greenway is noted and the ILDN appreciates that “one of the reasons for the success” of that fabled project was the presence of a dedicated walks officer and the allocation of other local authority staff. But it was far from the only important factor in the success to date of that initiative. The truth is that the development, maintenance of the trail and- crucially the support of the landowners and wider community in the project is the result of a genuine partnership. ILDN make the case that the work of RRO employed by *South West Mayo Development Company* (SWMDC) in working with landowners on the route on a previously developed walking path- and the fact that most of the landowners in the initial section were participants in the Department of Environment, Community & Local Government’s ‘Walks Scheme’ administered by SWDDC was also of critical importance to the continued success- and existence of the Western Greenway.

### Summary

The method by which the draft of *Irish Trail 2020* was compiled and offered for approval remains of concern in terms of not just the content but the degree of trust that some NTAC and other stakeholders retain in the process. The departure from the original methodology (workshops and regular briefings, etc.) is not explained by the regrettable withdrawal of the contracted consultants. Before ILDN can agree to support a revised draft, we want clarity on the approval process.

The recommendations that pertain to the designation of the local authorities as the local drivers of trail policy and the CCMA as the linkage of local work to national policy is of concern to ILDN. The very superficial treatment of what partnership consists of is inherent to that concern. ILDN will not support a document that sees the resources and funding of its members placed into such a lop-sided local ‘partnership’.

The recommendations on the establishment of new National Trail structures seem partial in their focus and undigested in their understanding of their consequence. ILDN has concerns that the proposal is appealing to some NTAC stakeholders- rather than to that body as whole- or to the collective benefit of the supposed object the development of trails in Ireland. The supposed relationship of the new structures to NTAC or, more crucially to CnaT is not sufficiently detailed.