

CUNNANE STRATTON REYNOLDS

First Revision to the National Planning Framework Consultation,
Department of Housing, Local Government and Heritage
Custom House
Dublin 1
D01 W6XO

SUBMISSION VIA ONLINE PORTAL

12th September 2024

Dear Sir/Madam,

Submission by Sport Ireland on the Draft First Revision to the National Planning Framework (July 2024)

I refer to the above and to your invitations for submissions on the aforementioned document by Thursday 12th September. We, Cunnane Stratton Reynolds Ltd, of Gainsboro House, 24 Suffolk Street, Dublin 2 act on behalf of Sport Ireland of the Sport Ireland Campus, Snugborough Road, Dublin 15.

We would be grateful if you would consider this submission which is presented under the following headings for your convenience.

- Sport Ireland
- Sport and Recreation in Ireland
- The Sport Ireland Campus as National Infrastructure
- Consideration and inclusion of sport and recreation as a component part of
 - sustainable development
 - active living and healthy places
 - accommodating growth
 - delivering better places
- Incorporating the Sport Ireland Campus into the Revised NPF as a Case Study and Exemplar
- Working with our neighbours.

In making this submission we greatly appreciate the hard work done in monitoring the existing NPF for performance, presenting this draft revision, and the opportunity to comment on the emerging document.

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Sport Ireland hope that with the incorporation of robust policies and objectives in relation to sport and recreation within the NPF that this will facilitate a holistic approach to sport and recreation in the future planning of our country. The NPF facilitates a sustainable and coordinated approach to statutory development plans seeking both the retention and protection of open space, sports and recreational facilities within our towns and cities. It encourages local authorities to continue to adopt zonings, policies and objectives that promote sustainable, healthy and high quality places with open space, sports and recreational facilities as fundamentally important components.

Sport Ireland

Sport Ireland was established in 2015 and is the national authority tasked with the development of sport in Ireland. Sport Ireland has a remit that covers participation in sport, high performance sports, anti-doping, and coaching. It also provides financial support to national and local sporting bodies, conducts research on sporting activities, in Ireland and provides governance support.

Recognising the influence and importance of sport across Irish society, Sport Ireland Statement of Strategy 2023-2027 sets out our vision for Irish Sport to 2027 and can be accessed here:

https://www.sportireland.ie/sites/default/files/media/document/2023-09/strategy_FINAL.pdf

The overarching vision in their 2023-2027 strategy is ‘*An active Ireland where everyone can enjoy the lifelong benefits of sport and physical activity*’ which is well aligned with national policy on sustainable development, active travel, tourism, and healthy activity. Implementation of the Government’s statutory responsibilities and the achievement of its ambitions for Irish sport cannot be carried out by the Department of Tourism, Culture, Arts, Sport and Media (DTCASM) and Sport Ireland exclusively. Sports policy in Ireland requires in particular the active engagement of the entire sports eco-system which includes National Governing Bodies of sport, the Local Sports Partnerships and the various representative sports organisations working alongside statutory and non-statutory agencies. In all respects delivering sports facilities and delivering on the States sporting promise is a team effort.

Sport and Recreation in Ireland

Definition of Sport

Ireland has adopted, and adapted, the Council of Europe’s definition where “*sport means all forms of physical activity which, through casual or organised participation, aims at expressing or improving physical fitness and mental wellbeing, forming social relationships or obtaining results in competition at all levels.*” Sport Ireland’s incorporation has resulted in two separate strands, namely ‘recreational sport’ and ‘competitive sport’. These have been defined in the Sport Ireland Act, 2015 and are set out on page 10 of the Sport Ireland Statement of Strategy 2023-2027 as follows:

- “*recreational sport*’ means “all forms of physical activity which, through casual or regular participation, aim at — (a) expressing or improving physical fitness and mental wellbeing, and (b) forming social relationships;” and
- “*competitive sport*’ means “all forms of physical activity which, through organised participation, aim at — (a) expressing or improving physical fitness, and (b) obtaining improved results in competition at all levels”.

For recreational sport, the emphasis is on fitness, wellbeing and forming social relationships. It

can be undertaken formally or informally and covers a wide range of activities such as recreational walking; cycling for leisure; canoeing or kayaking; exercising in a gym; playing tennis or 5-a-side soccer with friends; playing camogie on the local green, etc. Competitive sport is primarily about performance and results. It involves more structured participation in leagues or tournaments usually organised around school or club structures. There is a strong emphasis on coaching allied to periods of intense, high-level training.

Crucially in the context of the NPF, Sport Ireland exclude from their definition, activities such as active travel i.e. walking and cycling for transport, which are addressed under the Department's "Smarter Travel" Policy and work-related physical activity. Unfortunately, the vast majority of references in the revised Draft Revised NPF document to recreation and healthy activities are made in reference to walking and cycling as healthy or active modes of travel. Sports and recreation covers so much more than active travel.

However, one area of increasing activity and growth within the remit of active travel is trail running/jogging, walking, and hiking which are aligned with the NPF's active travel objectives and the promotion of greenways, BMX routes and cyclo-cross throughout the State. Sport Ireland hosts a national register of trails that can be found here: [National Trails Register](#).

Alongside the trails register Sport Ireland has published guides for trail development included among these is a guide to accessibility that can be found here: [Great Outdoors- A guide to accessibility](#). Enhanced access is also aligned with the national strategic objective within the merging NPF to enhance access to and enjoyment of the countryside. Further guidance on developing walking, cycling, and water trails can be found here <https://www.sportireland.ie/outdoors/trail-development>. These links to Sport Ireland advice would be very useful additions to the revised NPF and we would encourage their inclusion in the emerging document.

Contribution of Sport

Sport makes a positive contribution to so many aspects of Irish life including health and wellbeing, social and community development, economic activity, educational performance and life-long learning. Some of these are key touchstones for the emerging NPF and should be recognised in its text, national strategic objectives and in its case studies.

In respect of health and wellbeing evidence around the contribution of sport and physical activity to health and wellbeing is particularly strong. It is well known and long established that participation in sport and physical activity is effective in reducing depression, anxiety, psychological distress and emotional disturbance. In respect of community development and social cohesion sport also involves the highest level of community participation by adults playing, club membership and volunteering. Sport can also play a role in tackling societal challenges around anti-social behaviour, particularly when offered as part of broader personal development programmes or in conjunction with community and youth services while active and social participation by migrants and ethnic minorities can help combat the social exclusion.

In respect of education and lifelong learning, research has found that there is a strong correlation between playing sport and educational attainment. Sport Ireland work in partnership with their core partners, the National Governing Bodies (NGBs) and Local Sports Partnerships (LSP) whom are Joint delivery agents for the rollout of many national sports programmes in areas such as the safeguarding of children in sport and to organise and host significant international sporting events.

In that regard the economic benefit of sports events, related to tourism, which is acknowledged as a key driver of the national economy in the NPF, should also be recognised. The Local Sports Partnerships (LSPs) play a similarly vital role, being tasked with increasing participation levels in sport and physical activity, especially among those sectors of society that are currently underrepresented in sport.

Sport Ireland also invests in a number of other representative and specialist bodies to support the development of sport and physical activities across Ireland and to increase the capability and capacity of the wider sports sector. The following bodies also support Sport Ireland in meeting their strategic objectives and in delivering national sports policy actions: Federation of Irish Sport (the representative organisation for the NGBs and LSPs in Ireland); Student Sport Ireland; Age & Opportunity – Active Programme; and Active Disability Ireland.

In summary, sport makes a very significant contribution to the Irish economy in terms of spending output and employment, in much the same way that tourism does, and which receives significant promotion in the draft revised NPF. Government investment in sport generates a strong positive return on Exchequer investment while participation in sport reduces the risk of significant lifestyle related costs for the health service. Sports participation is also associated with better educational performance and with the development of life skills which enhance employment prospects.

Lifelong opportunities for participation in sport in all its forms are identified and promoted in Ireland's Lifelong Involvement in Sport and Physical Activity (LISPA) framework which illustrates how, based upon a foundation of physical literacy, people can choose to get and stay involved in sport and physical activity at recreational level or through active living, can go on to participate in organised sport, and can progress to involvement at the high performance level.

The Sport Ireland Campus as National Infrastructure

The Sport Ireland Campus, formerly known as the National Sports Campus, is truly a world class, high quality, facility servicing the nations athletes, coaches and support staff as well as providing office accommodation for Sport Ireland, the Olympic Federation of Ireland (OFI), Paralympics Ireland and the various national governing bodies (NGBs). It is at the forefront of Sport Ireland's ambitious and goal-oriented Sport Ireland Strategy 2023-2027 and is part of their objectives to further develop and improve sporting infrastructure in Ireland.

The development of the campus is a defined high level strategic objective under Core Area 1 of their Strategy 2023-2027.

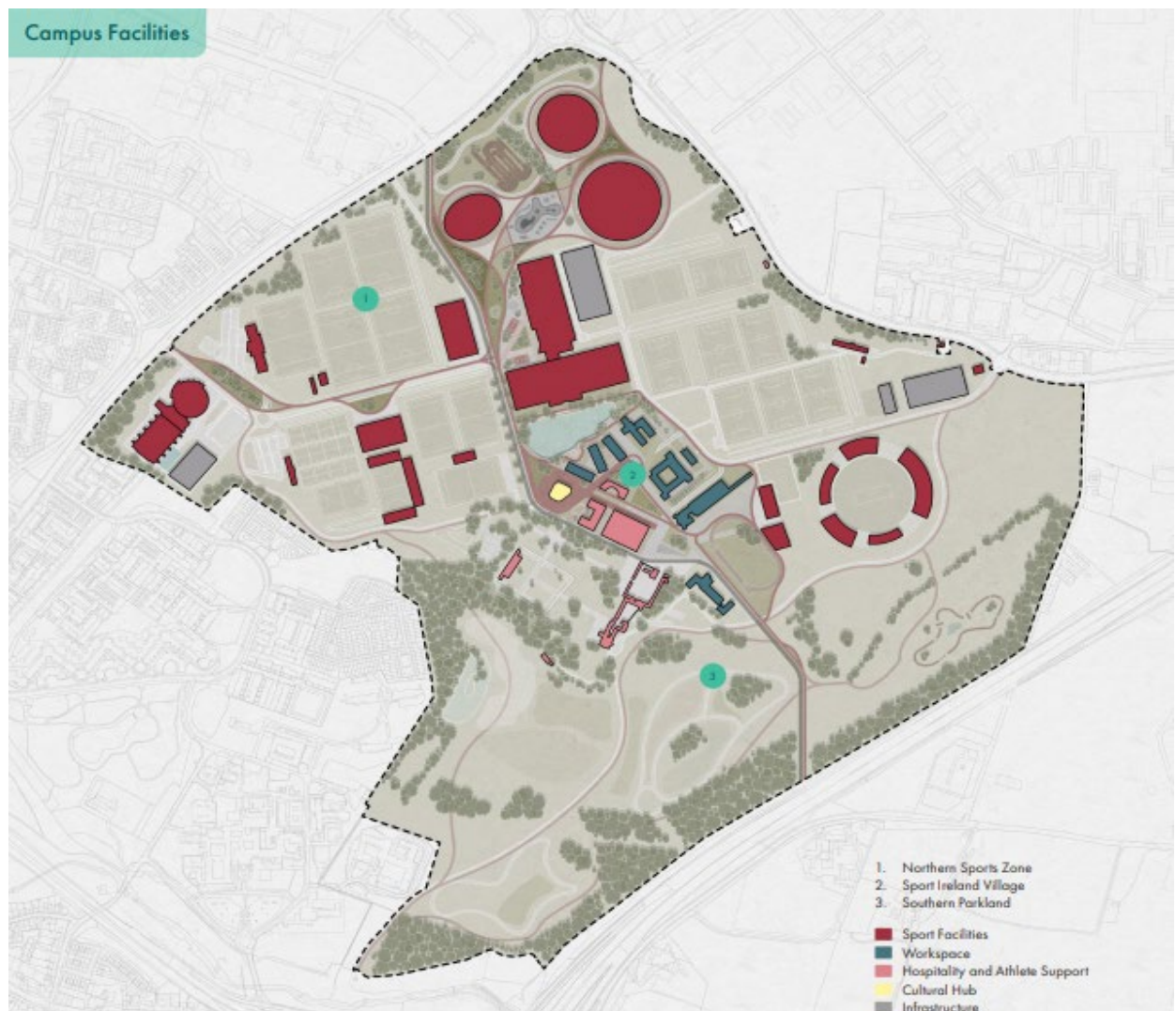
'Development and operation of a Campus that becomes the heartbeat of Irish sport where performance, participation, and recreational sport live side by side providing an inspirational location for the sporting community.'

The campus covers an area of circa 200 ha and accommodates numerous national and international standard events and world championships. The campus contains the National Aquatic Centre which is not only the centre of competitive swimming in Ireland but is also one of the top tourist attractions in Dublin. The whole campus, its facilities and the knowledge and expertise contained within it, are acknowledged as being of great significance to the record breaking haul of medals amassed by the Ireland's participants at the recent Paris 2024 Olympics and Paralympics. The National Velodrome and Badminton Centre is progressing and a planning application for the National Crickey Centre is currently being prepared.

As well as facilitating elite activity and competition, the campus has developed, and will continue to develop as a local facility, available to rent by local community groups, the public and local sports clubs. The campus currently hosts casual use, sports academies, team building events and corporate conferences. The significance of the Sport Ireland Campus is recognised in the Sport Ireland Strategy 2023-2027, and its continued development, is integral to the future development and success of Irish sport. The government supported Sport Ireland Campus 'Masterplan Vision' was launched in 2022, which set out the vision for the development of the campus to 2040. This can be accessed here:

<https://www.sportireland.ie/sites/default/files/media/document/2023-02/Sport%20Ireland%20Campus%20Vision%20-%20November%202022%20Rev%20A%20Spreads.pdf>

Figure 1: Sport Ireland Campus Masterplan



The core values set out in Sport Irelands 'Masterplan Vision' for the campus (see Figure 1 above) include the following:

- Sporting excellence – to create an athlete focused campus to promote and support high performance sport in Ireland;
- Placemaking – to create a new home for sport within Ireland with a vibrant and active core

and a series of memorable, distinctive and connected spaces;

- Community participation – to provide accessible recreational facilities for use and enjoyment by all;
- Health and well-being – to develop a campus and a culture that encourage healthy living and mental well-being; and
- Sustainability – to develop a sustainable campus that delivers Sport Ireland’s climate responsibilities.

From the above it is clear that the future development set out in the campus ‘Masterplan Vision’ over the next 15-20 years, is being driven by many of the key threads of the emerging revised NPF including the creation of memorable, distinctive and connected spaces; inclusivity; encouragement to healthy living and mental well-being; driven by sustainability and delivering Sport Ireland’s own climate responsibilities which are aligned with national obligations.

Facilities, such as the Sport Ireland Campus, have a proven track record in increasing participation, attracting new people into sport and helping them get more out of their experience. Investment in facilities therefore remains at the heart of the Government’s investment strategy in the future. The suitability of the campus and its future plans to be both a case study and exemplar within the revised NPF is set out below.

Consideration and inclusion of sport and recreation as a component of sustainable development and healthy active living

In the section 1.3 ‘Shared Goals – Our National Strategic Outcomes’ under the heading ‘Compact Growth’ it is stated that *‘Carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work.’*

This should be expanded to move away from a binary approach to development namely residential and employment which pre-occupies the NPF. Whilst it is acknowledged that there is reference to investment in enabling infrastructure and supporting amenities, sport and recreation along with cultural and community facilities, should be acknowledged for their contribution to social capital and community cohesion. The predominant focus in the NPF on healthy activities is on active travel, namely cycling and walking. A broader integration of recreation and sport into NPF policy would encourage social interaction, community cohesiveness, and would deliver quality places as part of a balanced and full range of land use activities.

Under the heading ‘Enhanced Amenities and Heritage’ it is stated objective to ensure that *‘our cities, towns and villages are attractive and can offer a good quality of life in terms of well-designed public realm, which includes public spaces, parks and streets, as well as recreational infrastructure.’*

This should be expanded to include sport and recreation for the advantage that sport, organised sport, team sport and community based sports activities bring to society. Section 3.2 (‘Eastern and Midland Region’) of the draft revised NPF identifies Dublin needing to become a greener, more environmentally sustainable city in line with international competitors.’ The Sport Ireland campus offers considerable potential in that regard and should be acknowledged in the emerging NPF.

We would suggest that the Sport Ireland Campus, with numerous facilities already built and

operating, not just as a local facility and amenity, but as a national facility (and indeed international facility) provides great benefit to the Dublin metropolitan area and beyond should be specifically mentioned. We would welcome and encourage the incorporation of the Sport Ireland Campus into the NPF as a world class venue and as indicated below request that it be recognised as not only a case study but additionally an exemplar of best practice.

Sport Ireland supports National Policy Objective 15 as it can provide local cultural, health, sports, recreational and community infrastructural enhancements and National Policy Objective 17 which encourages the provision of amenities and facilities to support regional development.

Accommodating growth and delivering better places

The NPF states that *'Quality design and placemaking is critical for making places attractive and distinctive. Sustainable and efficient movement, a mix and distribution of uses, the protection and enhancement of green and blue infrastructure, responsive built form and well-designed spaces can help to enhance our urban areas and create desirable places in which people want to live, work or visit and contribute to ongoing quality of life and well-being.'* This definition of quality places is missing a range of additional land uses including sport and recreation.

Accompanying National Policy Objective 14 should also be amended as follows:

'Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, a range of supporting land uses including sport, recreational and cultural, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals'

The NPF acknowledges that the 'liveability' or quality of life of urban places – how people experience living in cities, towns and villages – is important. This includes the quality of the built environment, including the public realm, traffic and parking issues, access to amenities and public transport and a sense of personal safety and well-being. This liveability and quality of life of urban places would be greatly improved by an adequate provision of sports, recreational and cultural facilities.

Figure 6.1 of the Draft NPF entitled *'Elements Supporting Quality of Life'* identifies health as a key component of quality of life. To ensure a healthier population going forward the *'National Physical Activity Plan for Ireland'*; their own *'Sport Ireland Strategy 2023-2027'*; and *'Healthy Ireland a National Health Strategy for Ireland'* are all important policy documents that must also be referenced in the emerging NPF. We believe the NPF should encourage more active lifestyles beyond cycling and walking, and facilitate a greater range of recreational and sporting pursuits which have the added advantage of enhancing a sense of community spirit and social inclusion. Please refer to the Sport Ireland Strategy 2023-2027 which is referenced to above for the benefits of sport and recreation in terms of adding to quality of life and lifelong participation under LISPA. In fact, the Sport Ireland Strategy 2023-2027 as summarised earlier in this submission overlaps and brings to together health, education, leisure and social interaction and overall life satisfaction.

In respect of National Policy Objective 37 we would ask you to include the Sport Ireland Strategy 2023-2027 along with the already mentioned Healthy Ireland policy document and National Physical Activity Plan.

Blue spaces are clearly recognised in the emerging NPF as sensitive environments and are an important part of sustainable water management and it is important to maintain and enhance water quality, water-based ecology and bio-diversity. However, we are an island people and the water within, and around our island, is also a valuable asset from a recreational and sporting perspective. Blue space including our coastline, rivers and streams, lakes and estuaries have significant recreational and sporting potential for all the population of the State. The beneficial use of blue spaces for both sport and recreation gives an additional opportunity to monitor the water environment. Biodiversity enhances the value of water bodies and recreational activity would help maintain and monitor that water quality. Some recreational activities would be very benign including fishing, canoeing, kayaking and diving and the interaction with biodiversity would be a key factor in the enjoyment of these water based recreational assets.

Greenbelts are an established part of the planning system and have a clear role in the Irish Planning System to prevent neighbouring settlements merging. That primary purpose can be maintained at the same time by accommodating recreational activities within such areas without significant harm to the visual amenity and functional integrity of such areas.

Incorporating the Sport Ireland Campus into the Revised NPF as a Case Study and Exemplar

The emerging NPF identifies a number of case studies that are emblematic of the key principles set out in this national planning guidance document. There are several reasons why the campus should be included as a case study and these include:

- The campus functions as: an international facility hosting world events; a national facility hosting national events and training; a regional facility for the Dublin metropolitan area; and, a local facility accessible to and available for use by the local community. The campus therefore caters for both elite sport and community participation and enjoyment.
- The campus promotes healthy activities spread across sport, recreation and leisure.
- A key requirement of the Campus Masterplan Vision, that will guide development on the campus over the next 15-20 years, is that in time it will be easier to access facilities by taking public transport, walking and cycling than it will be to take the car.
- Active travel modes are promoted through cycling and pedestrian access.
- It is a regional objective of the emerging NPF and growth enabler, set out in the Eastern and Midland Regional Spatial and Economic Strategy to enhance and better link the existing network of green and blue spaces in Dublin. It is the intention, set out in the campus masterplan to link the national green space of the campus with the regionally significant Tolka River Valley Park and the Royal Canal. This linkage will prioritise pedestrians and cyclist activity by providing a direct route over the M50 into the campus and facilitate onward connections to the rail network at Castleknock and Ashtown.
- In 2020, Sport Ireland conducted a sustainability assessment of the Sport Ireland campus and developed their own Sustainable Building Performance Guidelines. The campus assessment allowed for sustainability to be examined across different categories and metrics, with the identification of key areas of opportunity in the development of the Sport Ireland Campus.

These Guidelines are to ensure sustainability is embedded in the campus expansion’s planning, design, construction, and operation.

- The opportunities and targets presented in their ‘Sustainability Vision Statement’ represent aspirational goals and ambitions for Sport Ireland that may be modified as they continue on their sustainability journey as an organisation.
- Their visioning statement for their organisation sets out targets and metrics for 6 key sustainability pillars namely:
 - Energy;
 - Water;
 - Waste;
 - Mobility;
 - Biodiversity; and
 - Governance.
- For each of these key sustainability pillars a context and vision is established; a vision statement is generated; policy targets are identified; and opportunities are identified and assessed.
- Please see biodiversity opportunities identified immediately below in Figure 2 as they have undertaken for each of energy, water, waste, mobility, and governance.

Figure 2: Excerpt from Sport Ireland’s Sustainability Vision Statement

Biodiversity

Opportunity Assessment

Stakeholder Engagement and Awareness	<ul style="list-style-type: none"> • Build more awareness across the organisation on the importance of biodiversity, through workshops with other organisations like National Parks and Wildlife Service and Birdwatch Ireland. • Engage with local communities and stakeholders to help achieve the objectives of the Biodiversity Action Plan. • Design and implement citizen engagement and awareness campaign on climate change and biodiversity conservation to capture case studies, engage citizens in data collection and monitoring and promote biodiversity-friendly initiatives (e.g. Sports Club Guide for Pollinators).
Conserve and Restore Biodiversity and Ecosystem Services	<ul style="list-style-type: none"> • Establish Biodiversity Champions who will promote biodiversity across Sports Ireland. • Plant native plants and tree species in new locations where appropriate and in cooperation with relevant bodies, e.g. National Parks and Wildlife Service (NPWS), Coillte, etc. • 15% of development area to be valuable green space. • Develop criteria for not building on arable land and crop land, greenfield land with high biodiversity value, forest/wooded land, and designated sites such as special areas of conservation, natural heritage areas, and special protection areas.
Improve Understanding of the Impacts of Climate Change on Biodiversity	<ul style="list-style-type: none"> • Assess risks associated with a changing climate in the context of landscape fragmentation. • Assess landscape connectivity in order to inform site designation, protection, and connectivity, and to prevent the spread of invasive species. • Identify vulnerable ecosystems and species that through enhanced landscape connectivity would be less impacted by climate change in conjunction with relevant bodies such as NPWS.
Mainstream Biodiversity into Decision-making	<ul style="list-style-type: none"> • Implement No Net Loss as a minimum standard, and Net-Gain where possible through national or local net gain methodology when available. • Move towards No Net Loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in blue-green infrastructure. • Consider, design, and implement nature-based solutions as climate change adaptation and mitigation solutions and report relevant actions. • Review all activities, plans, and projects in order to confirm adherence to legislation. • Establish a plan to better utilise roof space across sites to establish green roofs or biodiversity spaces. • Design corridors and buffer zones, where appropriate, to enhance resilience of protected areas and designated sites by increasing opportunities for dispersal across the landscape, carried out in consultation with relevant organisations.

- It is intended to provide an energy centre to serve the campus.
- It is also intended that the campus would avail of a campus wide district heating system.

Working with Our Neighbours

Chapter 8 ('Working with our Neighbours') is supported by Sport Ireland. Page 109 is supported and in particular the following paragraph: *'This presents both significant opportunities and challenges, including the potential for increased investment into Ireland, while at the same time continuing to harness the potential of an all-island economy and maintaining the trade, infrastructural and many other linkages with our nearest neighbours.'*

Many NGBs operate on an all island basis. As an island we would restate waterways and waterbodies provide an invaluable water resource for sports, leisure and recreation, including those that are shared with our nearest neighbour, namely the Foyle River and Carlingford Lough, and the Shannon Erne Estuary. In both instances Waterways Ireland have recognised and sought to promote the potential of both water-based resources for recreation and sport in addition to the tourist potential of both.

The emerging revised NPF identifies that the 2030 ICC World Twenty 20 World Cup will be co-hosted in Ireland and we suggest the following amended text (additional text in red):

'Joint hosting of major sporting events, including of the UEFA EURO2028 Championship by Ireland and the UK, and the 2030 ICC Cricket Twenty20 World Cup by Ireland, Scotland and England, offers major opportunities to internationally showcase the world-class tourism and sports offering of both jurisdictions.'

We would urge you to include sports and recreational facilities as important features of National Strategic Outcome No. 10 which already refers to childcare, education and health. Sport and recreation should be placed on an equal footing given their interrelationships to both educational and health benefits of participating in sport and recreation beyond cycling and walking.

We trust that you will be able to consider the above and incorporate where appropriate the above into your final document which will be such an important policy consideration in the future physical development of the State to 2040.

We would be grateful if you could acknowledge safe receipt of this submission and please be advised that we would only be too willing to assist you, or expand on any of the above,

We wish you well with this project.

Yours faithfully,



Eamonn Prenter MIPI MRTPI

Director

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