

Planning Observation on the Central Mental Hospital Site Development (Dundrum Central)

Submission by: For and on behalf of Rosemount Mulvey FC c/o Gerard Coughlan, Secretary, Rosemount Mulvey FC, "Oakview", Taney Park, Dundrum, Dublin 14, D14 W281

Re: Part 10 Planning Application for Dundrum Central Development, Central Mental Hospital Site, Dundrum

Case Reference: 320912 An Bord Pleanála

A Chara,

Rosemount Mulvey FC (RMFC) is an association football club based on lands adjoining the Central Mental Hospital site, RMFC serves a growing community and plays a key role in promoting community involvement and participation in sport at all levels.

RMFC was originally two clubs, Mulvey Celtic which was based in Mulvey Park, immediately north of the proposed CMH Development; and Rosemount FC which was based at Rosemount Green, immediately south of the proposed CMH Development. In 2003 the two clubs amalgamated to form RMFC. RMFC continues to play home games in Mulvey Park and at Rosemount Green. In September 2022, RMFC was awarded the FAI Club Mark. In May 2023, RMFC was awarded the Football Association of Ireland (FAI) Club Mark One Star Player Development Centre Award. The One Star Award is awarded to clubs who hold the Club Mark Entry Level and have demonstrated a consistent high standard in:

- Club governance and administration;
- Child welfare and safeguarding;
- Coach education;
- Coaching structures;
- Player development planning.

RMFC is also a signatory to the CARA Sports Inclusion Charter which aims, to remove barriers faced by people with disabilities in sport participation.

Currently RMFC has 343 registered players (209 male and 134 female). This is up from 266 registered players in 2023 (166 male and 100 female). This represents a one-year increase of 28.95% in registered players. (RMFC notes this 28.95% increase has occurred prior to the commencement of most, if not all, of the significant residential development which is anticipated for the immediate locality.

In terms of teams RMFC has one senior men's team, one senior women's team, 16 underage boy's teams (up from 12 in 2023) and 10 underage girl's teams (up from 7 in 2023) providing a wonderful amenity for children in the local community. RMFC has teams at nearly all youth levels for both boys and girls (including multiple teams at some age levels). The underage section of RMFC is oversubscribed, meaning children are turned away entirely or are only allowed / rostered to play some but not all matches. In addition to registered players :

- RMFC promotes women's recreational football via the Kick Fit program providing a fun introduction for women to football with weekly training sessions.

- RMFC promotes men's recreational football by welcoming players of all abilities to participate in 5-a-side football.
- RMFC run Easter, Summer and Halloween Camps with an average of 100 children participating per week over three weeks in the summer, one week at Halloween, and one week at easter.
- RMFC's weekend Academy welcomes, on average, 70 children every weekend.

The emphasis across all teams is to promote an ethos of inclusivity and respect to teammates, coaches, referees and the opposition. RMFC fulfils a very important social function in an area that is socio-economically diverse.

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As already stated, RMFC has grown significantly in recent years; it is also anticipated that it will continue to grow. This continued growth is anticipated in circumstances where the population of the local area is due to grow significantly. It is noted:

- The current Local Area Development Plan envisages the construction of a further 24,007 new dwellings during the lifetime of the plan.
- The Planning Application herein records that there is significant development anticipated in the immediate locality.

Given this backdrop and the instant application it is clear that RMFC (and other similarly situated clubs) are going to come under significantly increased pressure in terms of numbers looking to join. At the moment RMFC is above capacity and has to refuse or limited the participation of significant numbers of people (primarily children) looking to join its teams on an annual basis. The major constraint on RMFC's capacity is lack of access to pitches, and in particular, floodlit all-weather pitches that would enable training and matches to proceed irrespective of the weather. The capacity constraint is only going to become more pronounced over the lifetime of the Local Area Development Plan, to the point where RMFC cannot fulfil its function as a community football club because of the volume of children it has no choice but to turn away.

RMFC believes that the redevelopment of the publicly owned lands at the Central Mental Hospital Site offers a unique opportunity for the development of sporting infrastructure and facilities for the local area, and for local sports clubs including (but not limited to) RMFC. RMFC believes that once these lands are developed, it is highly unlikely that lands of similar suitability, (particularly in public ownership), will become available to develop infrastructure and facilities that the local area needs.

On a site of 11.3 hectares there is a once-off scope to provide a community pitch facility for use of the surrounding clubs and societies. It is astonishing that the only provision for community sports is a 550 sq. m multipurpose sports hall. This is far too small to be usable for training for any field sport and the fact that it is indoor means that it is completely unsuitable for coaching soccer. RMFC is unaware of any comparable club (or indeed any GAA, rugby or hockey club that uses an indoor facility for coaching on a regular basis)

RMFC believes that the failure to include provision for the development of sporting infrastructure and facilities would constitute a historic irreversible mistake. RMFC believe that the absence or alternatively the clear insufficiency of the sporting infrastructure is not consistent with the Strategic Local Objectives for Dundrum / Clonskeagh as

contained in Chapter 14 of the current Local Area Development Plan. RMFC note Strategic Local Objective for Dundrum / Clonskeagh number 113 states:

'Any integration of / or connectivity between the Central Mental Hospital lands with the adjoining residential area should include the development of enhanced sporting facilities/ infrastructure for existing and future residents'.

RMFC believe the Planning Application herein fails to demonstrate compliance with and/or constitutes a material contravention of Strategic Local Objective 113, due to:

- The failure of the Planning Application to *'include the development of enhanced sporting facilities/ infrastructure for existing and future residents'* as is required, or in the alternative
- The minimal inclusion in the Planning Application of plans for the development of enhanced sporting facilities.

The proposed application makes no reference to the Sports Facilities Strategy as required by Policy Objective OSR9 of the CDP that requires:

"In accordance with the 'dlr Space to Play Strategy', 2017-2022, the Council will strive to provide facilities for sport and physical activity that are well maintained, sufficient in number and accessible to as many local people as possible, across a diverse range of sports. The Council will do this through relationships and interactions with local sporting clubs, regional and national sporting organisations, schools, community groups and DLR Leisure."

OSR10 requires that it is a policy objective:

"To ensure that adequate playing fields for formal active recreation are provided for in new development areas, That existing sports facilities and grounds within the established urban area are protected, retained, and enhanced, To increase the number of playing pitches in the County, To maximise the use of playing pitches in the County and for playing pitches to be utilised seven days a week, subject to protecting adjoining residential amenity."

None of these objectives appear to have been considered. It appears to RMFC that a floodlit Astro-turf pitch could be easily accommodated on a small footprint in the development that would fulfil a triple function of 1) integrating the new development into the community 2) providing chronically needed sports facilities for use in the evening and at weekends and 3) providing a mid-week day-time pitch facility for the use of Our Lady's Clonskeagh National School (a school which is chronically short of outdoor space for physical education) and other schools which are located in very close proximity to the CMH grounds.

RMFC believes that once these lands are developed, it is highly unlikely that lands of similar suitability, (particularly in public ownership), will become available to develop infrastructure and facilities that the local area needs. RMFC are concerned that the Planning Application herein does not show compliance, as is required, with the current Local Area Development Plan. RMFC are concerned that granting of the permission pursuant to the Planning Application herein would be in material contravention of the Strategic Local Objective 113 of the current Local Area Development Plan.

RMFC believe an Astroturf Pitch with Floodlighting is required for the following reasons:

- 1) In the winter months RMFC is not able to host training at its local base due to the lack of flood lit facilities, and due to the need to preserve the grass-based pitches. The quality of training, and participation levels in training is reduced as a result. Training occurs at St. Benildus College Astroturf Pitches (a 2.4km car journey from Rosemount Green) or at Marley Park Astroturf Pitches (a 5.4km car journey from Rosemount Green). The slots available in St Benildus are between the hours of 17:00 and 19:00. The 17:00 slot is highly unsuitable. It results in a lower number of participants due to the difficulty it presents for parents in getting their children there, and due to the problems it creates for voluntary coaches who have great difficulty in getting out of work for that time. Additionally training at these venues results in a significant number of additional car journeys, the need for which would be obviated if facilities were available locally.
- 2) Grass based pitches in Rosemount Green are routinely unplayable due to rain / the weather. By way of example, in the period between the 14th of September 2023 and the 5th of April 2024, weekend fixtures were curtailed on at least 12 separate weekends. The curtailment, on the vast majority of these weekends, resulted in the cancellation of all games. The curtailment was generally because Dun Laoghaire Rathdown County Council deemed pitches unplayable. (There were however instances where club officials deemed pitches unplayable and where the curtailment was less than all matches).
- 3) The new sand / grass-based pitch in Rosemount Green will assist however it does not obviate the need for an Astroturf Pitch with Floodlighting.
- 4) It is envisaged that ‘there will be a substantial increase (approximately 20%) in the frequency of heavy precipitation events during Winter and Autumn. (Source Environmental Protection Agency see <https://www.epa.ie/environment-and-you/climate-change/what-impact-will-climate-change-have-for-ireland/>) This substantial increase makes the need for the provision of an Astroturf Pitch all the more urgent.
- 5) An all-weather astroturf pitch would serve as a resilient, reliable facility for year-round sports, addressing the lack of accessible, weather-resistant pitches in the area. This facility would meet the needs of both new and existing residents, providing a local space for youth and adults alike.
- 6) Floodlighting, with suitable cowling on the lights to ensure no light spill and strict conditions on the hours of operation to prevent any nuisance to residents of the new development, would extend usability, by allowing evening training sessions and activities in the winter months, aligning with the needs of working individuals and supporting youth programs that often require later sessions.

b) RMFC believes provision for changing facilities and a referees room is required for the following reasons:

- 1) RMFC acknowledges the Planning Application herein envisages the provision, in the development, of changing rooms.
- 2) Adequate changing facilities are essential for a fully functional sports site, particularly with an anticipated increase in the local population. RMFC believe four changing rooms are required to accommodate multiple teams, promoting inclusive access for men’s, women’s, and youth teams.

- 3) RMFC believe a dedicated referee's room would provide a safe, comfortable space for officials, supporting the increased demand for structured sports and youth development programs. These facilities are vital for enabling structured events and competitive leagues, enhancing the appeal and usability of the Dundrum Central development.

However, if the Board is of the view that no changing facilities can be incorporated on the footprint available RMFC would still very much welcome provision of Astro-turf pitch *simpliciter*. In RMFC's view this would be far preferable to a situation where it cannot accommodate the number of children that want to play football and/or it routinely has to cancel matches and training for those that can join because it has no access to all-weather facilities.

Conclusion:

RMFC can only support the development if the community, sporting and recreational needs of the expanding population, are addressed by including, as a condition of the development, provision for a flood lit astro turf pitch and changing facilities.

RMFC believes the provision of the facilities and infrastructure requested herein, is entirely consistent with the LDAs objectives and with the Local Area Development Plan.

RMFC believes the failure to provide provision for the facilities and infrastructure requested herein, is not consistent with good and proper planning in the area.

RMFC questions the compliance of the Planning Application herein with the current Local Area Development Plan and regards the proposed development as a material contravention of the CDP.

RMFC believes that this is a unique historic opportunity, and that failure to provide provision for the facilities and infrastructure requested herein, on these publicly owned lands would constitute a grave mistake.

RMFC is grateful for the opportunity to make this submission.

