

# Planning Statement



Recreational Sports Hub

Rathmore Park

Lusk, Co. Dublin

**Comhairle Contae  
Fhine Gall**  
Fingal County  
Council



## 1.0 Introduction

Fingal County Council are seeking planning permission from An Bord Pleanála for the development of a Recreational Sports Hub at Rathmore Park, Lusk, Co. Dublin, under Section 177AE of the Planning & Development Act, 2000, as amended, due to possible links identified in the Appropriate Assessment Screening Report between the proposed development site and an EU designated conservation area.

This planning statement provides project background information, site context and description of the proposed development. The application includes the Appropriate Assessment Screening Report, Natura Impact Statement, Environmental Impact Assessment Screening Report, Flood Risk Assessment, required plans and drawings.

## 1.1 Site Location & Description

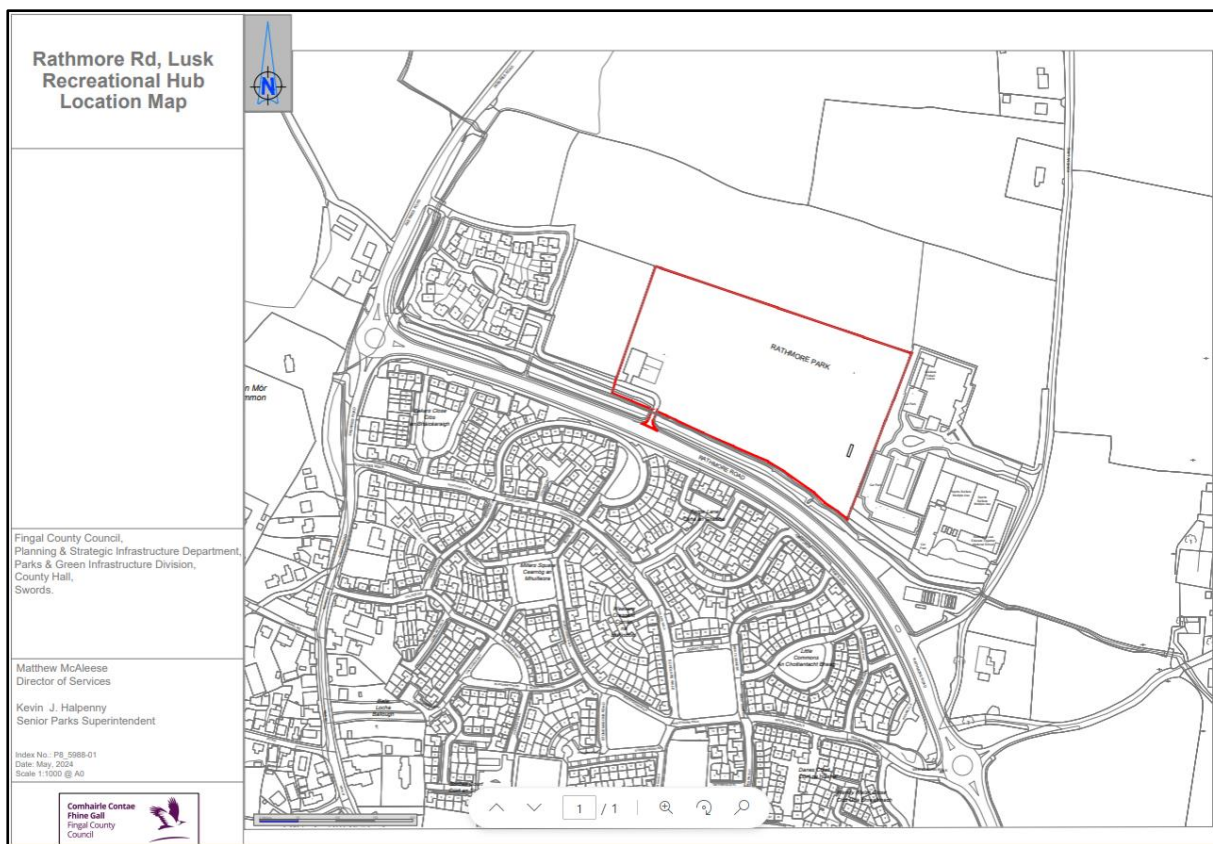


Figure 1. Site Location

The site is located within Rathmore Park, a 7.5ha Local Park located on Rathmore Road, Lusk, Co. Dublin. The Landscape Character Type is Low Lying Agricultural (Fingal Development Plan 2023-2029).

The park is bounded to the north by Rahenny Park residential development and agricultural lands zoned for residential use, to the west by Clonrath residential development, to the east by Lusk Community College secondary school and to the south by Rathmore Road (R127).

The park has a relatively flat topography with the northern elevated section separated from the southern section by a narrow planting of small trees & shrubs and a metal railing fence. The proposed works are contained within the southern section of the park in proximity to the Rathmooney (aka The Bride) Stream which is parallel with Rathmore Road. As it is located within a Local Park (2ha-20ha) the recreational sports hub has an intended catchment area of 1km radius. The proposed development of a Recreational Sports Hub will provide a high quality and wider range of sports facilities for local community use.

## 2. Proposal & Justification

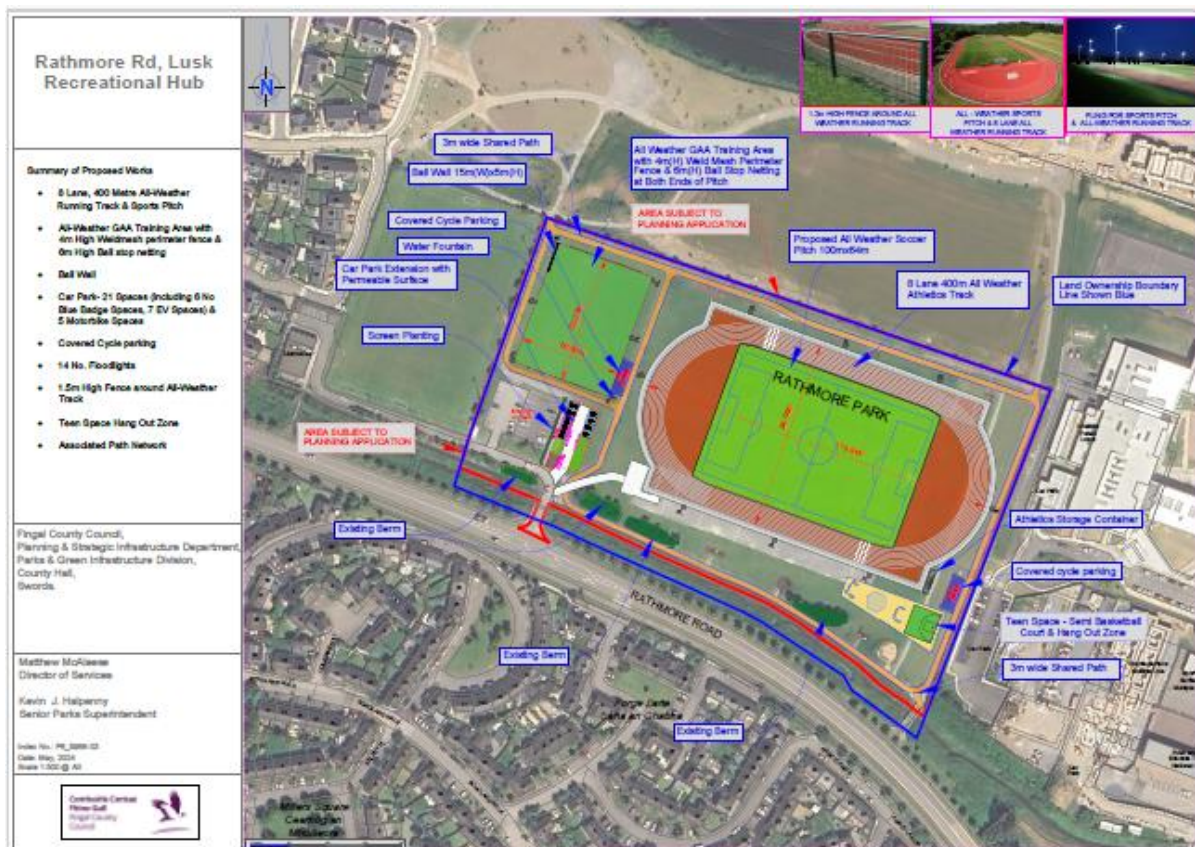


Figure 2. Proposal Plan

The proposed Rathmore Recreational Sports Hub development includes the following:

- A new all-weather GAA training area measuring 74m x 28m with a ball-wall measuring 20 x 5m at the northern end, enclosed with a 4m high weld mesh fencing and 2no. ball stop nets 20m x 6m at the south and north of the training area.
- A new All-Weather soccer pitch measuring 100m x 64m with flood lighting and All Weather 8 lane athletics running track with flood lighting, enclosed with a 1.2m high weld mesh fence finished black in colour at 1.2m from the edge of the running track and located on a permeable tarmac footpath surrounding the track 2.7m width from the edge of the track and finished with a pin-kerb at both edges of the tarmac.



- Proposed extension to the existing car park of 21no. additional spaces including disabled & EV ready parking bays. Car park to consist of asphalt road and permeable surface (grass & concrete paving or similar) to parking bays.
- A new storage container for sports equipment measuring approximately 12m x 2.4m x 2.5m.
- Landscaping works including soil grading, mounding, tree planting and boundary treatments.
- Covered Bicycle parking – 30no. bicycle parking spaces to include adapted bicycles.
- A teenage space to include a half size basketball court, and hang-out zone with teen appropriate play features.
- All other ancillary Site Works including re-location of existing play equipment and new signage, footpaths, drinking fountain and electrical & drainage connections.

The population of Lusk has increased significantly over the past two decades to 10,774 people (Census 2022). Almost one third of the population (3,304) are aged under 17 years old. The development of surrounding residential zoned lands created a requirement for the provision of Class 1 public open space by developers (F00A/1454 and related permissions).

Since 2015 local sports clubs have joined together as Lusk Community 2020 Sports Plan to campaign for the development of sports facilities within Rathmore Park. The development of this sports hub facility will meet the existing demand by local clubs.

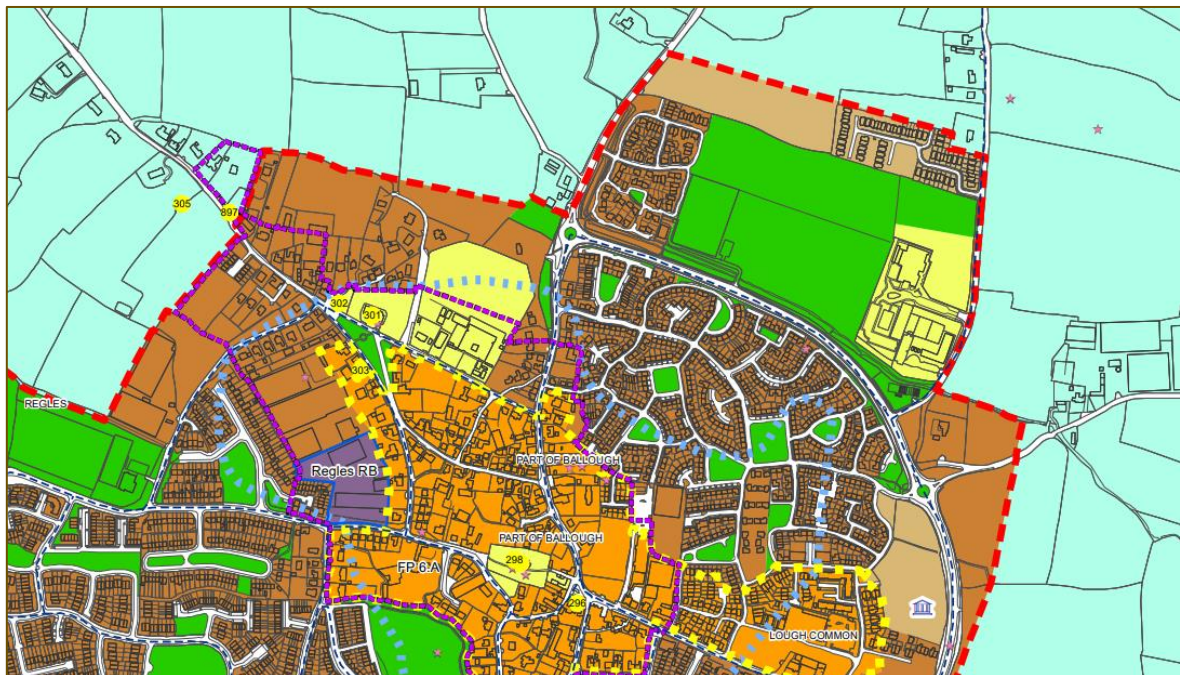
The park's activity features include Lusk United AFC pitch & facilities, 2no. grass pitches utilised by Round Towers Lusk GAA club, a sprint track for Lusk Athletic Club, a new enclosed playground and a play trail for older children. The park has a wide range of regular users including the named local sports clubs, students from the adjoining secondary and primary schools, dog walkers and local families.

### 3. Planning & Policy Objectives

#### 3.1 Fingal Development Plan 2023-2029

On Sheet 6A Lusk within the Fingal Development Plan 2023-2029, Rathmore Park (north of town centre) is zoned Open Space. This zoning objective has a stated aim to:

*'Preserve and provide for open space and recreational amenities.'*



**Extract of Sheet 6A of Fingal Development Plan 2023-2029: Open Space zoning of Rathmore Park.**

#### The OS Zoning Vision:

*Provide recreational and amenity resources for urban and rural populations subject to strict development controls. Only community facilities and other recreational uses will be considered and encouraged by the Planning Authority.*

<b>Uses Permitted in Principle</b>			
Community Facility	Golf Course	Open Space	Recreational/Sports Facility

The proposed development aligns with the *Recreational/Sports Facility* permitted use of the Open Space zoning as per Fingal Development Plan 2023-2029.

## Active Recreational Hubs

The *Community Infrastructure and Open Space* chapter (section 4.3 'Opportunities') of the *Fingal Development Plan 2023-2029* identified audited locations within Fingal for accessible sport & recreational facilities, highlighting the *Lusk Vision 2030: Lusk for Life* action plan.

The proposed development aligns with a number of *Community Infrastructure and Open Space* objectives for strategically located sports & recreational facilities in parks and open spaces throughout the County. Specifically, the policies and objective below, extracted from the current Development Plan will be met by the proposed development.

### Policy CIOSP6 – Facilities for Children, Teens and Young Adults

Provide appropriate recreational, community, social and educational facilities for children, teens and young adults.

### Policy CIOSP8 – Sports Facilities

Ensure that all communities in the County are facilitated with a variety of sporting facilities that are fit for purpose, accessible and adaptable.

### Objective CIOSO13 – Active Recreational Hubs and Multi-Use Games Areas

Promote the development of high-quality and multi-functional recreational facilities throughout Fingal, including Active Recreational Hubs and Multi-Use Games Areas to meet existing and future community needs, in accordance with the *National Sports Policy 2018–2027*.

## Green Infrastructure Maps within the Fingal Development Plan 2023-2029

- **Green Infrastructure Map 1 (Sheet 14)**

The park is not located within the Highly Sensitive Landscape designation. It has a site-specific Mapped Objective **GIM1** to:

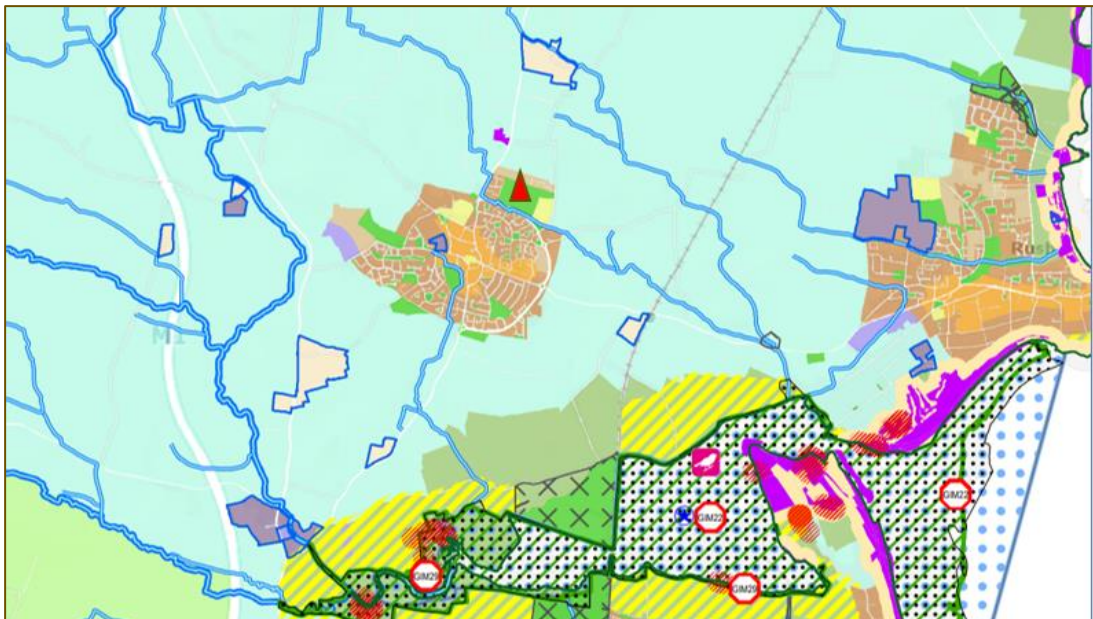
*'Provide new Active Recreational Hubs in Bremeare Regional Park, St. Catherine's Park (Rush), Lusk, Donabate, Mooretown/Oldtown (Swords), Drinan, Baldoyle Racecourse Park and Phoenix Park Racecourse.'*



**Image 2: GI Map 1 – Green Infrastructure Mapped Objectives** (Site location marked with red triangle)

- **Green Infrastructure Map 2 (Sheet 15)**

A river forming part of the Fingal Ecological Network is shown located along the southern boundary of the park. This watercourse joins another before entering the sea at Rogerstown Estuary. This estuary is shown on Sheet 15 as a Special Area of Conservation (SAC) and a Special Protection Area (SPA).



**Image 3: GI Map 2 – Fingal Ecological Network** (Site location marked with red triangle)



- **Green Infrastructure Map 3 (Sheet 16)**

The watercourse is shown to be of 'Moderate' EPA River Water Quality Status. The rating description states '*A reduced diversity of species and the presence of moderate pollution defines 'moderate' status water bodies.*

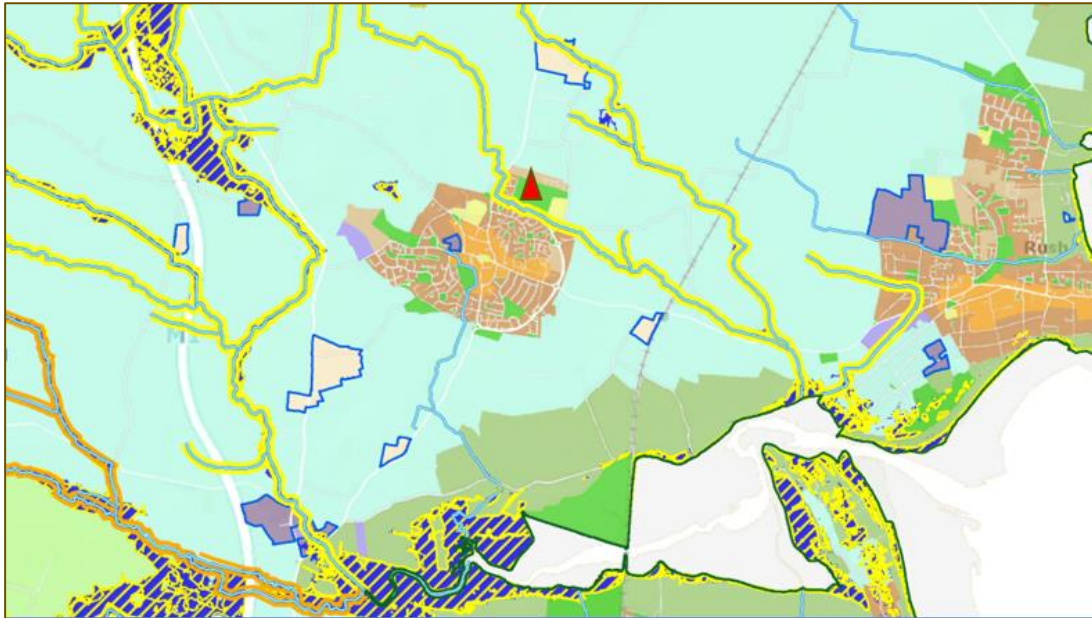


Image 4: GI Map 3: EPA River Water Quality Status & Strategic Flood Risk Assessment

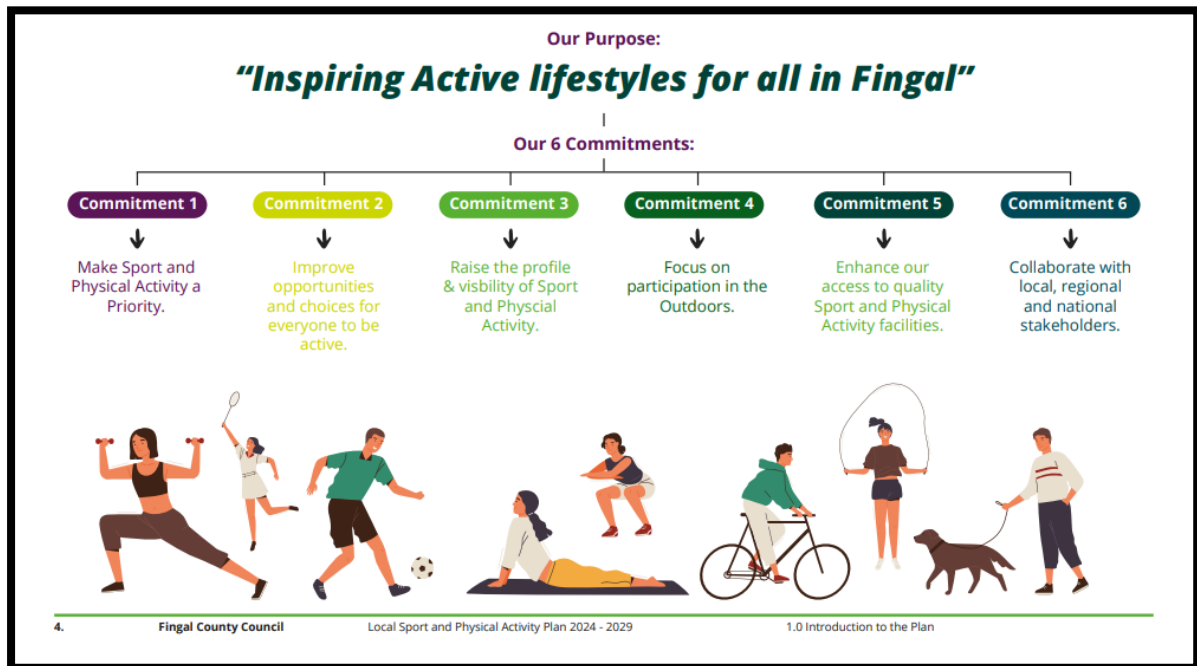
### **3.2 Lusk Local Area Plan (2009)**

Although expired, the 2009 Lusk LAP had identified the Rathmore Park for the development of sporting facilities (incl. 3no. playing pitches) to address the shortfall in recreational amenities in the town. It has therefore, been a longstanding objective of Fingal County Council to develop these lands for recreational and sporting activities.

### **3.3 Active, Together – Local Sport and Physical Activity Plan 2024-2029**

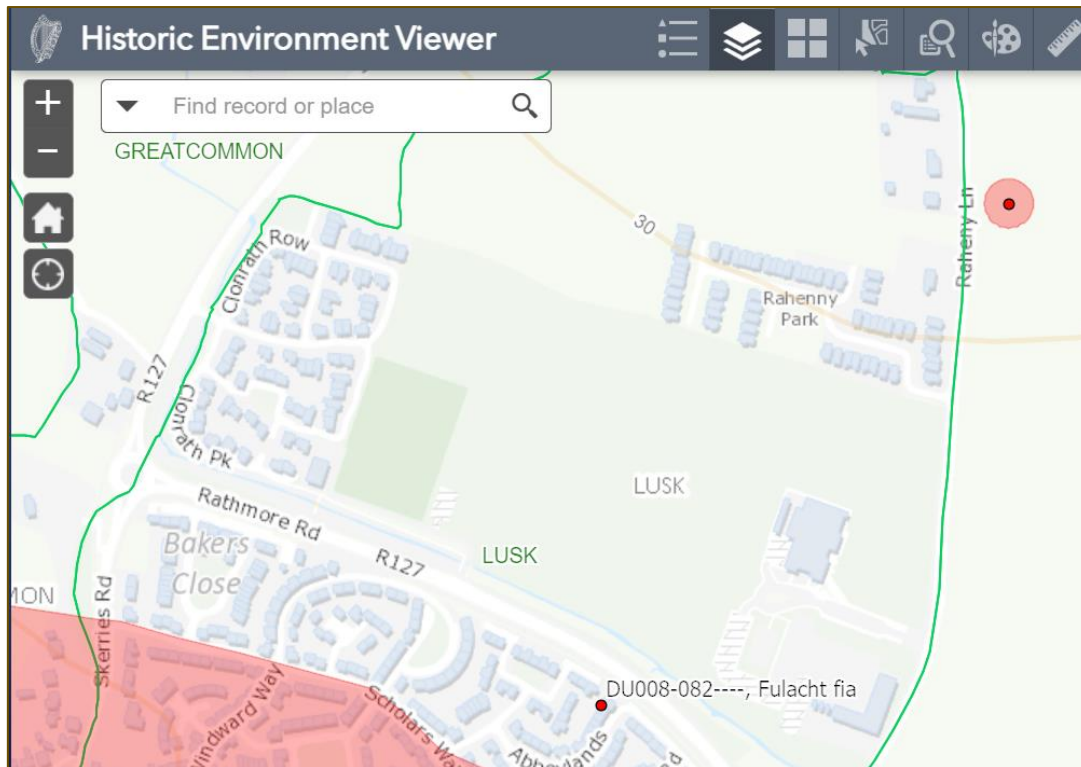
The *Fingal Sports and Physical Activity Plan 2024-2029* aims to increase participation in sport and physical activities to create sustainable communities and health benefits for Fingal residents.

The provision of 'Outdoor Sports Facilities (e.g. New Fingal Hubs)' delivered through the Planning and Strategic Infrastructure Department is identified within the Whole Council Approach of the *Fingal Sports and Physical Activity Plan 2024-2029*. This Plan supports the objectives of the *National Sports Policy 2018-2027*.



### 3.4 Archaeology

The proposed development is located outside identified Structures & Recorded Monuments Zone on the Department of Housing, Local Government and Heritage's online portal Historic Environment Viewer:



**Image 5. Recorded Archaeological Features** adjacent to Rathmore Park, Lusk  
<https://heritagedata.maps.arcgis.com>

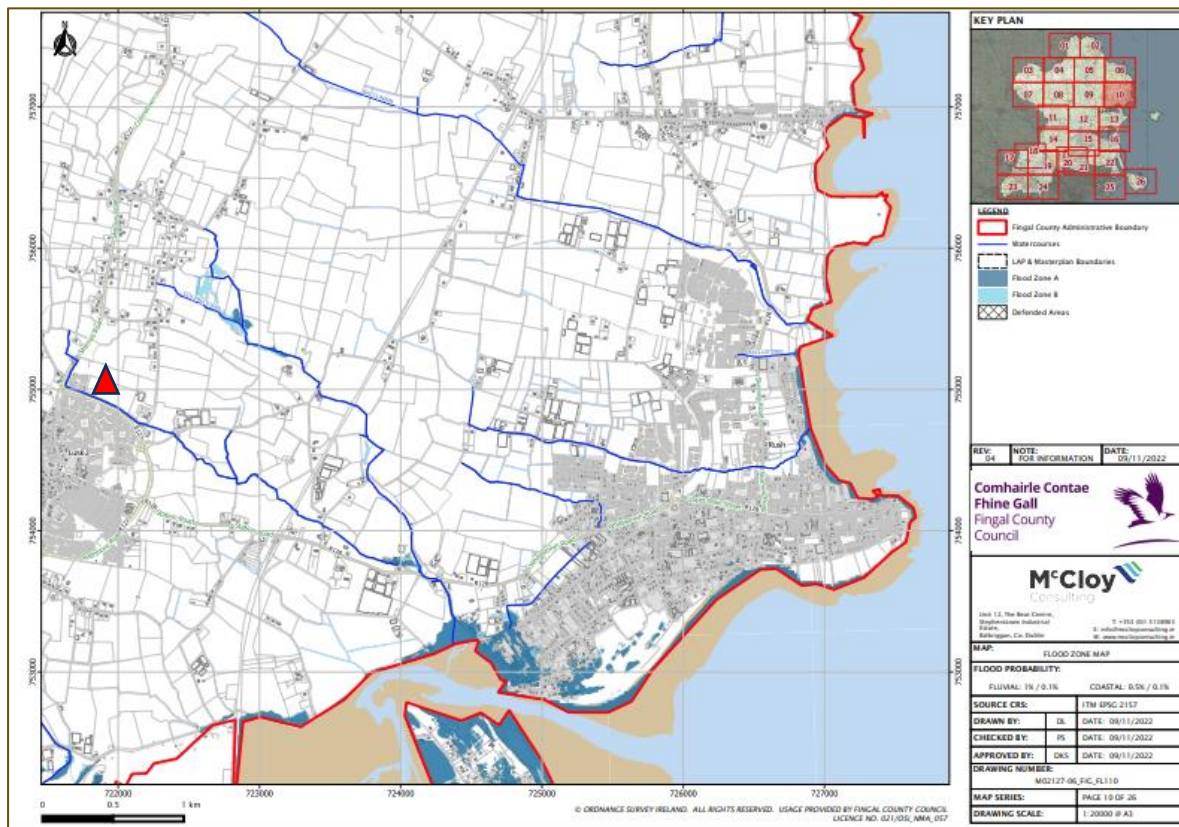
It is also noted from an initial desktop Archaeological Scoping exercise that previous excavations in proximity to the site such as those permitted under NMS licence refs 19E0791 (northern section of park outside the development site), 21E0853 and 21E0515 on adjoining development lands did not identify any archaeological remains ([www.excavations.ie](http://www.excavations.ie)).

A pre-construction archaeological assessment in compliance with the *Guidance Notes on Procedures (National Monuments Act 2004)* shall be undertaken to determine any required testing for unidentified archaeological material. Liaison with the Council's Heritage Officer will continue during the pre-construction and construction phases.

Archaeological monitoring during ground works if recommended in the pre-construction assessment, will be undertaken to best practice standards including *Archaeology & Development: Guidelines for Good Practice for Developers* (Heritage Council, 2000).

### 3.5 Flood Risk Assessment

A Flood Risk Assessment report has been prepared by McCloy Consulting in compliance with the 'Planning System and Flood Risk Management – Guidelines for Planning Authorities' published by the OPW and Dept. of Environment, Heritage & Local Government in 2009.



**Flood Zone Map No. 10, Fingal County Council 2022** (Rathmore Park marked with red triangle)

The report's Summary Findings state that the proposed development is located within Flood Zone C. Given the nature of the proposed development of a recreational sports hub there is no required minimum flood design level.

The Flood Risk Assessment surface water drainage recommendations including SuDS components such as permeable pavement and a filter drain enclosing the pitch which shall be incorporated into the car park and sports facility detailed design. A Proposed Surface Water Drainage Design, prepared by the consultant engineer is included in the application.



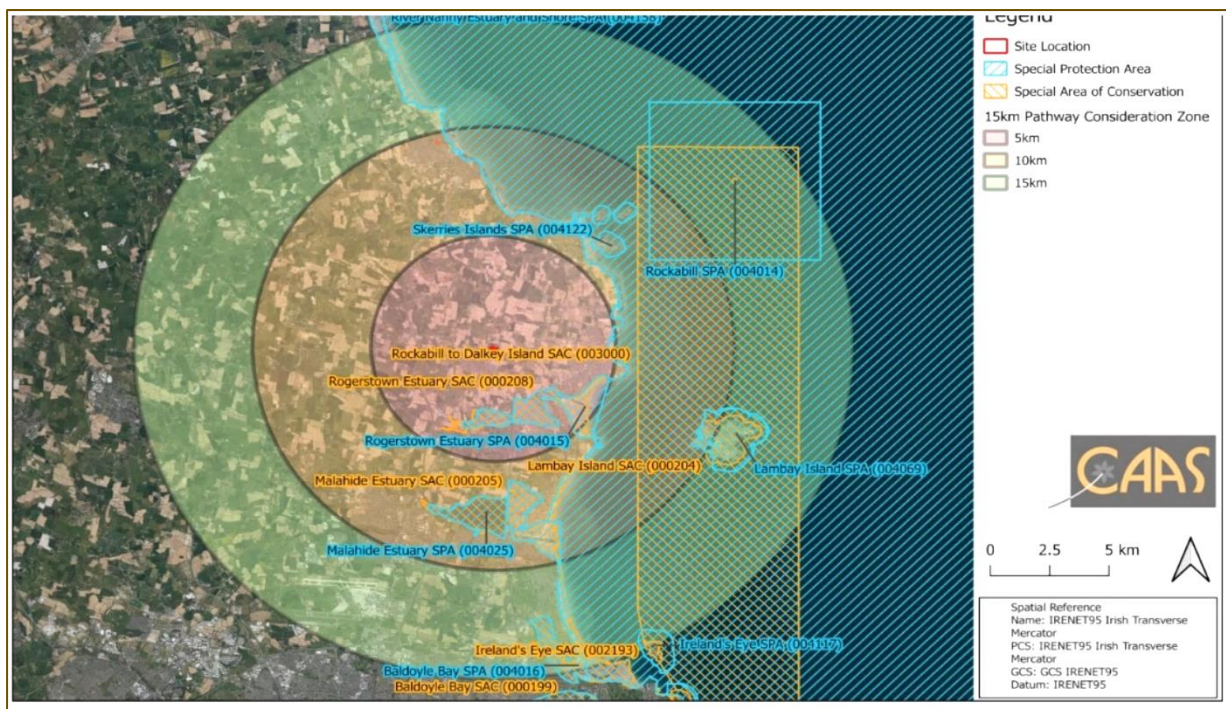
#### 4. EIA Screening & Appropriate Assessment

Environmental Impact Assessment Screening and Appropriate Assessment Screening was undertaken by CAAS Ltd. The Environmental Impact Assessment Screening assessed the proposed development with reference to EIA legislation including the EU Directive 2011/92/EU, Planning & Development Act 2000-2020 and associated regulations of European and national EIA legislation.

The proposed recreational sports hub does not correspond to any class of development prescribed in Part 1 of Schedule 5 of the Planning and Development Regulations 2001 as amended.

The EIAR Screening Report having due regard to current legislation, case law and guidance, has concluded that the proposed development does not need an Environmental Impact Assessment and therefore no EIAR is required.

An Appropriate Assessment Screening Report was also performed by CAAS Ltd. In accordance with Article 6(3) of the EU Habitats Directive.



European sites within 15km of Rathmore Park, Lusk.

The AA Screening report identified two potential effects on designated sites and species during the construction stage. A possible noise disturbance on any ex-situ foraging bird species and a hydrological link affecting water quality through surface water run-off from earthworks. A watercourse located along the southern boundary of the park called the Rathmooney stream (on EPA maps) and known locally as the Bride stream, connects into Rogerstown Estuary SAC & SPA approximately 2.27km downstream and onwards to the North-West Irish Sea cSPA.

Operational phase effects are considered localised and small scale with permanent loss of potential supporting habitat namely for ex-situ foraging birds, if present. Therefore applying the precautionary principle and in accordance with Article 6(3) of the Habitats Directive, the potential for significant effects could not be fully excluded and a Stage 2 Appropriate Assessment report has been prepared and included in this application.

## **5. Prescribed Bodies**

The details of this application were sent to the following Prescribed Bodies:

- An Taisce
- Dept. of Housing, Local Government and Heritage
- Dept. of Tourism, Culture, Arts, Gaeltacht, Sport & Media
- Inland Fisheries Ireland
- Uisce Eireann
- The Heritage Council

Copies of the notification are included with this application.

## **6. Conclusion**

The planning documentation including a Natura Impact Statement report submitted with this application have been performed to best practice standards and demonstrate that the proposed development will not have a significant impact on EU designated sites or species.

The proposed development of a Recreational Sports Hub at Rathmore Park aligns with the site's Open Space zoning and planning objectives in the Fingal Development Plan 2023-2029.

It is considered that the proposal aligns with planning legislation, Fingal County Council's plans and policies in order to create a sustainable community.