

Casement Park and Euro 2028: The Issues

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February 2024

Key Points Summary

Casement Park is a Gaelic Athletic Association (GAA) sports ground located in Andersonstown, West Belfast. The ground opened in June 1953 but has not been used for sporting purposes since June 2013. It presently lies derelict.

The Ulster Council of the Gaelic Athletic Association (UCGAA) is proposing the construction of a new 34,500 capacity stadium on the existing Casement Park GAA ground. Planning permission for the proposed redevelopment was granted in July 2021. However, work has not yet started, due to lack of funds and, in November 2023, the withdrawal of the contractor for the stadium build.

Even though it is not yet built, or even started, Casement Park is one of 10 venues included in the joint UK and Ireland bid which was selected by UEFA to host the Euro 2028 finals tournament. This paper shows why the decision to include Casement Park as one of the 10 host venues is **a serious mistake**, likely to result in **a waste of scarce public resources**.

Having stalled due to lack of funds, the inclusion of Casement Park in the UK and Ireland bid means the project has potentially been thrown a financial lifeline. The UK government appears willing to step in and rescue the project financially, for the specific purpose of hosting the 2028 Euros.

But the funding of Casement Park remains controversial and **the provision of additional public funds over and above the £61.4 million agreed by the Northern Ireland Executive in March 2011 does not have cross-community support**. There is significant political opposition to giving the GAA a blank cheque in the face of rapidly rising construction costs, particularly in light of the tight constraints on public sector expenditure in Northern Ireland

Even if a funding package was to be agreed, there is **a high risk that the Casement Park redevelopment would not be completed in time for the 2028 Euros**.

As of February 2024, **the project does not have a contractor to build the stadium** and has yet to commence the procurement exercise, due to difficulties in compiling a list of suitable contractors. That will delay the start of works on the stadium.

The site is known to be **contaminated** with asbestos, raising the possibility of further delay, even if works were to commence.

More fundamentally, **the Casement Park design for which planning permission was granted does not actually satisfy UEFA requirements for a stadium to serve as a Euros Final venue**.

UEFA requires that stadia included in a Finals tournament must have “at least **30,000 net seating capacity**”. UEFA also **prohibits the use of temporary seating and standing spectators**.

With a spectator capacity of 18,500, Windsor Park football stadium does not presently meet the UEFA requirement for 30,000 net seating capacity. Ostensibly,

Casement Park was preferred as it has an approved design capacity of 34,500. Albeit, the political support for redeveloping Casement Park was undoubtedly the critical factor, as the inclusion of the site in the UK and Ireland Euro 2028 bid presented the opportunity to resuscitate a flailing project.

The problem is that the proposed Casement Park redevelopment was granted planning permission for a stadium with **a notional seating capacity of 26,011** and a further **8,175 spectators in a standing terrace**. That is, **a shortfall of at least 4,000** compared to UEFA's requirement for 30,000 net seating capacity.

The question then arises as to **how would the GAA meet UEFA's net seating requirement?** The public, whom the GAA expect to fund the proposed stadium, has yet to be provided with a full answer to that question. However, the intended approach is starting to crystallise. And it is bizarre.

As outlined by the Department for Communities (DfC), the lead funder within the Northern Ireland Executive, in order to meet UEFA's requirements, **the stadium would initially be constructed as an all-seated stadium, with a capacity of 30,000 spectators**. **Following the 2028 Euros**, the intention, as stated by DfC, is to **revert to the approved design**, i.e., with a standing terrace. That is, the intended 30,000 all-seated stadium would only be 'temporarily permanent'.

The approach outlined by the DfC suffers a number of **major problems**.

First, the GAA **do not have planning permission for a 30,000 all-seated stadium**.

In order to construct a stadium with 30,000 net seating capacity, the approved plans would need a redesign. **If the redesign was to represent a material change to the approved plans**, that would require **a fresh planning application**, which would further delay the project. Proceeding with such a design without regularising the plans would **risk enforcement action**, which would put the availability of the stadium for the 2028 Euros at risk. It would also be highly embarrassing for the Government if the stadium was built, at huge public expense, to a design which did not have the requisite statutory approval and became subject to enforcement action.

The provision of public funding, in the hundreds of millions of pounds, for the construction of **a stadium that did not conform to the approved plans** raises **serious issues around regularity and propriety** in managing public money.

Second, constructing a 'temporarily permanent' 30,000 all-seated stadium and then reverting to the original design **would undoubtedly add to the total project costs**, compared with building to the approved design, thereby adding further layers of complexity to the formulation of a funding package and the procurement process.

But even if the project was to be completed in time, **the site poses numerous difficulties** in successfully hosting three matches at the 2028 Euro Finals. **Those difficulties stem from the ground's constrained location**, as it abuts residential properties on three sides (the 'horseshoe' of Mooreland and Owenvarragh).

The highly constrained footprint of the ground renders it **impossible to meet UEFA's extensive infrastructure requirements**, notably the requirement for an

outer perimeter within which temporary facilities could be located (broadcast compound, media centre, volunteer centre, etc.).

Again reflecting the constraints of the site, **the ground suffers poor accessibility, especially in relation to public transport.** One bus service, no train service and just one main road route connecting the site to the rest of Belfast. And the local area does not possess the parking capacity to support a large stadium.

The site's limited accessibility, with comparatively few entry and exit points, also means that the stadium is **oversized in relation to its location within a residential area.** That **would create huge difficulties in obtaining a safety certificate for a 30,000+ capacity stadium.** And the award of such a certificate would be open to legal challenge.

If **the GAA** are given a blank cheque to build a new stadium at Casement Park, they **would certainly gain a lasting legacy from the 2028 Euros.**

The legacy benefits for other sections of the community are absent. That is especially true for the Northern Ireland football community. In particular, the funds originally promised in 2011 for upgrading of football stadia across Northern Ireland, via **the Sub-regional Stadia Programme,** are **in danger of being left behind, if not squeezed out entirely** by the amount of funding that would be required to build the Casement Park stadium, leaving **no lasting legacy for football.**

Furthermore, the two main communities are sharply divided on the use of Casement Park for the 2028 Euro Finals. Building Casement Park on the back of the 2028 Euro Finals is **more likely to damage than to enhance community relations.**

With the Casement Park project delayed once again, due to the funding issues and the need to find a new contractor, **now is the time to reconsider the options.**

For the reasons outlined in this paper, **Casement Park is not a suitable location** for hosting the Euro 2028 Finals.

Arguably, Northern Ireland does have a need for a 30,000+ capacity stadium, but for use as a multi-sports stadium, in a neutral venue in public ownership. However, at this juncture, **a new multi-sports stadium is a longer-term consideration** and could not be considered a feasible option for hosting the 2028 Euros.

Adding additional capacity to the Windsor Park stadium is a serious option and worthy of appraisal. That option was **not** considered in the support given by government for the inclusion of Northern Ireland as a Euros 2028 venue. In the current circumstances, the option should at least be considered and subjected to a proper appraisal. In many respects, **Windsor Park is more favourably situated to host the 2028 Euro Finals** and there would be an identifiable and tangible legacy for the football community.

There is also the option of withdrawing Belfast as a Euro 2028 host venue. **Spending £500+ million to host the 2028 Euros, including £300+ million on an oversized new stadium, would not be cost-effective and would also entail a huge opportunity cost.** Funds diverted to hosting the 2028 Euros could be better

spent in helping to tackle the acute social and economic needs that have come to the fore in a climate of severely constrained public expenditure.

Finally, it may be noted that the Department for Communities in Northern Ireland is engaging with HM Treasury regarding the business case for provision of UK government funding for the proposed redevelopment of Casement Park. Having regard to the requirements for managing public money, that engagement poses a number of problems for HM Treasury, as follows.

First, the NI Executive has no spare funds. Effectively, therefore, the UK government is being asked to cover almost all of the project costs.

Second, **funds provided with the objective to support hosting of the 2028 Euros in Belfast cannot expect to achieve value-for-money**, particularly considering the risks highlighted in this paper. Also, the expected benefits of hosting the tournament would surely be outweighed by the combined costs of hosting the event and building a new stadium specifically for that purpose.

Third, while the Northern Ireland Assembly has previously voted to allocate £62 million for Casement, in the 2016-17 Budget, there is presently no legislative vote that would authorize subsidy payments to the GAA that are likely to exceed £200 million. The absence of parliamentary authority means that the expenditure of additional funds would fail to satisfy **the regularity criterion** for managing public money.

Fourth, there is a serious problem of **additionality** in providing **grant assistance** specifically for **a new GAA stadium**. The GAA have reiterated their desire to get the stadium built **regardless of what happens with the Euro 2028 finals** and have expressed confidence that **“significant funding”** will be secured from **the Irish government**¹. To that extent, the provision of **UK government funding** for a new stadium **could not be viewed as satisfying the additionality criterion**. That is, in making grants to voluntary sector organisations, such as the GAA, a key value-for-money requirement is that the proposed assistance should be the minimum needed to bring about the project. Insofar as the GAA expects the stadium to be funded by the Irish government, the optimal UK government contribution towards meeting the costs of a new stadium for the GAA is zero.

¹ RTE News, *Casement Park: Can fans and politicians unite over Euro venue?*, 30 November 2023, at <https://www.rte.ie/news/primetime/2023/1130/1419354-casement-park-row/>.

Introduction

Casement Park is a Gaelic Athletic Association (GAA) sports ground located in Andersonstown, West Belfast. The ground opened in June 1953 but has not been used for sporting purposes since June 2013. It presently lies derelict.

The Ulster Council of the Gaelic Athletic Association (UCGAA) is proposing the construction of a new 34,500 capacity stadium on the existing Casement Park GAA ground.

Final planning approval was granted for the GAA's proposals on 28 July 2021. The statutory approval was affirmed in a decision issued on 31 May 2022 by the High Court in Belfast, following an unsuccessful judicial review brought by a local residents' group.

Nonetheless, the redevelopment of the site has not yet commenced, as the proposed redevelopment is currently stalled due to insufficient funds. The GAA claims it does not have the necessary own resources to implement the proposed redevelopment. Instead, the project is overwhelmingly reliant on grant aid from the public sector, but the amount pledged to date is far short of what is now required.

In March 2011 the Northern Ireland Executive approved an indicative award of **£61.4 million** to support the GAA's aspiration for the redevelopment of Casement Park. That award was made within the framework of the Executive's **Regional Stadia and Sub-regional Stadia Programmes**. The GAA's contribution was set at £15 million, giving a total project budget of £76.4 million.

Since then, however, the redevelopment costs have spiralled. By March 2019, the expected construction costs had risen to £110 million². As Casement Park is a contaminated site within a very constrained location, in all likelihood the costs will continue to mount and, realistically, will climb above £200 million³. Building a stadium capable of serving as a venue for the 2028 Euro Finals would add further costs. The total costs have yet to be confirmed, but a recent report suggests the costs have risen to £300 million or more⁴.

The GAA have sought to limit their own contribution to the £15 million agreed in 2011 and are pushing for the additional costs to be met from the public purse. However, the additional costs will not be met from within the Northern Ireland Executive's budget. **The money is not there**. Furthermore, as the Casement Park project is controversial and cross-cutting, Executive approval would be required for the disbursement of funding in excess of the agreed £61.4 million⁵. That may not be forthcoming.

² See para 3.9, Northern Ireland Audit Office, *Major Capital Projects*. Report dated 19 December 2019. Available at <https://www.niauditoffice.gov.uk/publications/major-capital-projects>.

³ For further detail on that issue, see *The Case against an Oversized Casement Park*, available on request.

⁴ Mark Simpson reporting on *Talkback*, BBC Radio Ulster, 20 February 2024.

⁵ On that point, it should be noted that around £12 million of the original award has already been expended on development costs, leaving less than £49.4 million available for the redevelopment from the original March 2011 grant award.

That much is clear from comments made by Sir Jeffrey Donaldson, the leader of the Democratic Unionist Party (DUP). Speaking in October 2023, Sir Jeffrey is quoted as saying, “he did not know if the GAA stadium would be built in time for the Euro 2028 football tournament but insisted that there would be no extra money from Stormont for the project”⁶.

Nonetheless, the GAA’s proposed redevelopment of Casement Park has been thrown a financial lifeline following its inclusion as one of the venues in the UK and Ireland bid to host the 2028 Euro finals. Specifically, both the UK and Irish governments have stated they are willing to step in and rescue the project financially. On 20 February 2024, the Irish government announced a commitment of €50 million (£43 million), but that only represents 14% of the estimated £300 million stadium costs⁷.

However, the Northern Ireland Secretary of State Chris Heaton-Harris has essentially made an open-ended commitment to find the funds for Casement Park. Speaking in May 2023, following the submission of the Euro bid documents, Mr Heaton-Harris is reported as saying: “We’ll get the money, don’t you worry”⁸. That is, a blank cheque for the GAA.

The Secretary of State’s promise to “get the money” appears to be contrary to HM Treasury requirements for managing public money, including especially the **regularity and propriety criteria**. For example, where is the statutory or legislative basis for “the money”? Can such an off-the-cuff promise be considered to meet any threshold for propriety?

But the funding of Casement Park remains controversial and **the provision of additional funds over and above what was agreed in March 2011 does not have cross-community support**. The absence of cross-community support for additional funding for the Casement Park project means that the provision of funds by the UK and/or Irish governments would be contrary to the good governance of Northern Ireland. As outlined in the Belfast Agreement and the Northern Ireland Act 1998, controversial cross-cutting matters are intended to be dealt with by the Northern Ireland Executive.

In addition, those commitments have been made even though **the final costs are not yet known**. But handing the GAA a blank cheque **is likely to result in a waste of scarce public funds**. That is because there are **a range of risks around having the Casement Park stadium completed and fully prepared to serve as a venue for the 2028 tournament**. Before discussing the risks, it is useful to first consider the question of why Casement Park was chosen for inclusion in the UK and Ireland bid, rather than the already existing National Stadium at Windsor Park, the home of Northern Ireland’s international football team.

⁶ Belfast Telegraph, *Jeffrey Donaldson raises ‘big questions’ over Casement Park funding and Euro 2028*, 11 October 2023, at <https://www.belfasttelegraph.co.uk/sport/football/international/jeffrey-donaldson-raises-big-questions-over-casement-park-funding-and-euro-2028/a942025444.html>.

⁷ BBC News, *GAA says £15m contribution to Casement Park is near its limit*, 21 February 2024, at <https://www.bbc.co.uk/news/uk-northern-ireland-68354653>.

⁸ BBC, *Casement Park: Chris Heaton-Harris confident new park will be built*, 20 May 2023, at <https://www.bbc.co.uk/news/uk-northern-ireland-65637275>.

Why Casement and Not Windsor?

Ostensibly, the now-derelict Casement Park was selected over the existing Windsor Park stadium based on differences in spectator capacity relative to UEFA requirements.

UEFA requires that stadia included in a Finals tournament must have “at least **30,000 net seating** capacity”⁹. UEFA defines ‘net seating capacity’ as follows¹⁰:

*The net seating capacity means the number of seats **actually available to the public**, excluding all media infrastructure and not counting seats which cannot be sold for reasons of view obstruction. [Emphasis added]*

The Windsor Park net seating capacity is 18,500 spectators, which is 11,500 less than the UEFA minimum of 30,000. With a proposed net spectator capacity of 34,500, a redeveloped Casement Park appears to meet the UEFA requirement.

However, **the Casement Park design for which planning permission was granted would not actually satisfy the UEFA requirement**. The proposed redevelopment was granted planning permission for a stadium with **a notional seating capacity of 26,011** and a further **8,175 standing spectators**. But UEFA stipulates that “no non-seated spectators will be permitted” and “no provisional or temporary seating installations will be permitted”¹¹. That is, the standing terrace would be no use for the Euro Finals and the minimum 30,000 net seating capacity should be a permanent design feature.

Consequently, there is **a shortfall of 4,000** between the UEFA requirement for 30,000 net seating capacity and the Casement Park net seating capacity design, as approved. Though, it should be appreciated that the proposed net seating capacity of 26,011 is **a notional figure** and **the actual net seating capacity would be lower**, for two reasons.

First, as stated in the Design and Access Statement (DAS) accompanying the planning application¹²:

The final nett seat figure will depend on the number of seats removed for operational reasons such as permanent TV camera positions, steward seating, segregations lines (if ever required), trophy presentation overlay and additional players seating.

Second, according to the approved design, the 26,011 ‘seats’ comprise 23,053 General Admission seats and 2,958 seats distributed across ‘Premium’ bars (2,162), Hospitality Dining (656) and VVIP Dining (140)¹³. With that configuration, the

⁹ UEFA, [Tournament Requirements: UEFA Euro 2024](#), Sector 02, pp 4-5.

¹⁰ Ibid, p 5.

¹¹ UEFA, [Tournament Requirements: UEFA Euro 2024](#), Sector 06, p 18.

¹² Ibid, para 4.23.

¹³ Populous, *Casement Park: Design and Access Statement*, para 4.23, submitted with the planning application for Casement Park (LA04/2017/0474/F).

number of seats “actually available to the public” would certainly be less than 26,011, perhaps much closer to the 23,053 General Admission seats.

That is, the shortfall between the approved design and UEFA’s 30,000 net seating capacity requirement will certainly exceed the notional shortfall of 4,000.

The question then arises as to **how would the GAA meet UEFA’s net seating requirement?** The public, whom the GAA expect to fund the proposed stadium, has yet to be provided with a full answer to that question. However, the intended approach is starting to crystallise. And it is bizarre.

In response to a newspaper query, dated November 2022, when the 2028 Euros bid was under preparation, the GAA stated that¹⁴:

*Casement Park will be capable of holding the desired 30,000 capacity for the Euros **when built** and in line with UEFA requirements if required in 2028.*
[Emphasis added]

That statement by the GAA has been clarified by the Department for Communities (DfC), the lead funder within the Northern Ireland Executive. In their response to an information request (reproduced as Annex A), issued in December 2023, DfC have stated that:

.... the seated terrace to the south of the stadium will be constructed for a football configuration and after the tournament concludes in 2028, will be changed to a UCGAA configuration, with a standing terrace.

The EURO Tournament fixtures that will be held at Casement Park will accommodate a total of 30,000 seated spectators in order to satisfy UEFA requirements.

The DfC response signals a **two-stage approach**, i.e., build a 30,000 all-seated stadium for the 2028 Euros and then convert the stadium back to the design for which planning approval was granted, i.e., 26,000 seated and 8,175 in a standing terrace. Alternatively, construct a ‘temporarily permanent’ all-seated stadium specifically for the 2028 Euros¹⁵.

The two-stage approach as outlined by DfC is clearly designed to circumvent UEFA’s prohibitions against temporary seating and standing spectators. However, the approach suffers a number of major problems.

¹⁴ Irish News, *Questions over how Casement will meet UEFA’s 30,000 capacity*, 17 November, 2022, at https://www.irishnews.com/sport/gaafootball/2022/11/17/news/questions_over_how_casement_will_meet_uefa_s_30_000_capacity-2908078/

¹⁵ It is important to note that the substitution of seated accommodation for the approved standing terrace would not be considered ‘temporary’ permitted development in planning terms. The Planning (General Permitted Development) Order (Northern Ireland) 2015 uses a threshold of 28 days to classify the use of land for temporary buildings as permitted development. But UEFA requires a newly-built stadium to be completed 24 months in advance of a Finals tournament.

First, **the GAA does not actually have planning permission for construction of a 30,000 all-seated stadium.** The question then is whether the re-design that would be necessary to build a 30,000 all-seated stadium represents a material or a non-material change to the design that received planning approval? A material change would require a fresh planning application.

Certainly, a 30,000 all-seated stadium design is **a substantial variation** from the approved plans. Consequently, it is possible that replacing a standing terrace with an all-seated design **may represent a material change**, for example, if the height of the stadium had to be raised to accommodate an all-seated design.

If the redesign was to represent a material change to the approved plans, that **would require a fresh planning application**, which would further delay the project. Alternatively, an application could be made for a non-material change. As of February 2024, the Northern Ireland Planning Register showed no record of any such application regarding the redevelopment of Casement Park.

At the very least, it would seem reckless to proceed with the construction of a 30,000 capacity all-seated stadium without submitting an application for a non-material change, to clarify the legality of the temporarily permanent seating and regularise the approach. In the absence of such clarification, if the intended 30,000 all-seated stadium design was in fact to represent a material change to the approved plans, **construction of such a stadium would risk enforcement action**, which would put the availability of the stadium for the 2028 Euros at risk.

It would also be highly embarrassing for the Government if the stadium was built, at huge public expense, to a design which did not have the requisite statutory approval and became subject to enforcement action. Indeed, such a scenario would be **contrary to the regularity and propriety criteria** for managing public money. Publicly funded projects should not proceed without all necessary statutory approvals definitively in place.

Second, what are **the cost implications**? The intended two-stage approach will undoubtedly further increase the cost of proceeding with the Casement Park redevelopment, in a number of respects:

- Consultancy and other fees for the necessary re-design work, including meeting UEFA's requirements for TV camera positions, spectator sightlines, etc.
- Installing permanent seating to UEFA's quality and viewing specifications would most likely be considerably more expensive than a simple standing terrace (not to mention a waste of resources, if the seating was later to be removed).
- Post the 2028 Euros, the removal of the seating and conversion back to a standing terrace.

An associated question is: what has been the effect in terms of delays to the project of the re-design and added costs of the two-stage approach?

According to the IFA, the UEFA deadline for a new-build stadium to be completed is one year prior to an event starting. Albeit, the published UEFA requirements actually refer to completion 24 months prior to the start of a Finals Tournament¹⁶, which raises the possibility that UEFA have granted an exemption for Casement. Nonetheless, the risk of failing to meet the UEFA timescale, whether that is 12 months or 24 months, is surely rising.

Third, in light of the significant work and associated extra costs that would be required to implement a Casement Park design to meet UEFA's requirements, **was consideration given to an extension of capacity at Windsor Park?** That is an important question to ask since, in many respects, **Windsor Park is more favourably situated to host the 2028 Euro Finals.**

First, Windsor Park already exists while Casement Park lies derelict.

Second, Windsor Park already has a safety at sports grounds certificate. But that is another statutory hoop through which the Casement Park stadium must go through, if it ever gets built.

Third, as discussed in more detail below, the Windsor Park location is much better suited to meeting UEFA's extensive requirements for supporting infrastructure as well as spectator access, especially via public transport.

Notwithstanding those advantages, an expansion of Windsor Park spectator capacity was **not** considered as an option for hosting the 2028 Euro Finals, i.e., **no appraisal was undertaken of the costs and benefits of that option for comparison with the Casement Park option in the lead up to submission of the UK and Ireland bid**¹⁷. Given the mismatch between UEFA requirements and the approved Casement Park design, coupled with the risks posed to the successful hosting of the 2028 Euro Finals at Casement Park and the enormous uplift in the costs of the proposed stadium, public officials were surely under an obligation to appraise the Windsor Park option, to ensure best value for money.

According to the CEO of the Irish Football Association, the option to expand capacity at Windsor Park was not considered because there was no possibility of obtaining the funds required¹⁸. But when the long list of stadia for the UK-Ireland bid to host the 2028 Euros was first submitted in November 2022, Casement Park lay derelict, the GAA did not have sufficient funds to build the proposed stadium and the approved design did not include a 30,000 net seating capacity.

¹⁶ UEFA, [Tournament Requirements: UEFA Euro 2024](#), Sector 06, p 5.

¹⁷ The Department for Communities (DfC), the Regional Stadia Programme funder, was asked via a Freedom of Information request whether the option of installing additional seating capacity at the National Stadium at Windsor Park had been appraised in the lead up to the submission of the UK and Ireland bid to host the 2028 Euro Finals. In their response dated 17 November 2023, DfC said they hold no information on any such appraisal. A similar query was put to the Department for the Economy (DfE). On 19 December 2023, DfE replied to say that they hold no information on any appraisal of the option of installing additional seating capacity at Windsor Park (Reference DfE EIR 2023-135).

¹⁸ BBC, *Euro 2028: Irish Football Association rules out Windsor Park extension*, 15 November 2023, at <https://www.bbc.co.uk/sport/football/67431772>.

Unquestionably, the inclusion of Casement Park as a venue for the 2028 Euros owed everything to the political importance attached to the project by the nationalist/republican political parties. The Euro 2028 bid presented an opportunity to salvage a project facing spiralling costs and no other route to financial salvation. In all likelihood, that political imperative was sufficient to rule out an expansion of Windsor Park, without proper consideration being given to that option.

But the consideration of alternative options is an essential ingredient of a robust economic appraisal of the costs and benefits of achieving a desired outcome, in this case, the inclusion of Belfast as a venue for the 2028 Euros. Value for money is one of the four criteria set down by HM Treasury for managing public money. It can also be noted that a robust business case is one of the elements in meeting the requirement for propriety in managing public money.

Politically motivated funding decisions inevitably pose risks to the achievement of value for money. In this instance, the political imperative has resulted in a failure to consider alternative options. That is just one of a number of risks arising from the opportunistic resort to the 2028 Euros as a funding vehicle for a redeveloped Casement Park.

Could the Stadium be Built in Time?

UEFA permits three types of stadia to be submitted for Euro Finals events, as follows:

- Type 1 – existing stadia needing only minor modifications.
- Type 2 – existing stadia requiring major renovation and upgrading.
- Type 3 – new stadia to be developed, with a deadline of **four years** before the Tournament **for construction to commence**.

For proposed Type 3 stadia, UEFA stipulates that¹⁹:

*Newly built or completely renovated stadiums need to be completed **24 months prior** to the start of the tournament in order to have sufficient time to achieve the requested level of operational excellency for EURO Final Tournament operations. [Emphasis added]*

The stated requirements for new stadia mean that UEFA expects the Casement Park stadium build to commence on or before June 2024 and to complete before mid-June 2026. Two points may be noted regarding the UEFA requirements.

First, for stadia “undergoing partial renovation works”, the latest completion date is “four months before the start of the Availability Period”²⁰, i.e., February 2028. Whether an expansion of seating capacity at Windsor Park would be considered a “partial renovation” is not known, but the time constraint for such a development is considerably less tight than for a new-build stadium.

Second, according to the Irish Football Association (IFA), the “UEFA deadline for a new-build stadium to be completed is **one year** prior to an event starting”²¹ [emphasis added]. The IFA does not source the assertion of a one-year requirement in any published UEFA document. As the assertion contradicts the two-year limit stipulated in the published UEFA bid requirements document, that raises the possibility of **an exemption** having been granted for the inclusion of Casement Park in the UK and Ireland bid.

What can be said is that aiming for a one year ahead deadline of June 2027 raises another set of difficulties, since that limits the time available for the ground to achieve certification to safely operate at a 30,000+ capacity.

Regardless of whether the time limit is one year or two, the Casement Park redevelopment faces a number of risks to having stadium construction completed in time for the 2028 Euro finals.

¹⁹ UEFA, [Tournament Requirements: UEFA Euro 2024](#), Sector 06, p 5.

²⁰ The Availability Period is the period over which the stadium is available to UEFA for set-up and tournament matches (see [Tournament Requirements: UEFA Euro 2024](#), Sector 06, p 10).

²¹ IFA written reply, made in November 2023, to a letter from the Amalgamation of Northern Ireland Supporters Clubs (AONISC) and posted on the AONISC Facebook page.

First, as of February 2024, the GAA **does not have a contractor** in place to actually build the stadium. The contractor appointed in December 2013 was a joint venture between the Buckingham Group and Heron Brothers. However, the Buckingham Group entered administration in September 2023. As a result, it is now necessary to conduct a procurement exercise to appoint a new contractor²². That process will further delay the project.

The procurement process must adhere to the Public Contract Regulations and the DfC is taking the lead in the effort to appoint a new contractor. As of February 2024, DfC did not have a definitive list of contractors willing to engage in a procurement competition²³. However, DfC does not itself possess the requisite expertise to manage the complexities of the procurement exercise and has asked the Strategic Investment Board to launch a recruitment drive to appoint a technical director to help deliver the project. That will further delay the project timescales.

Whereas they had hoped to start in spring 2024, the procurement process means that the GAA are now in a position of **hoping** that “work can still begin before end of May [2024]”²⁴. The end-May 2024 aspiration is important because, as noted above, UEFA require new stadia to commence at least four years prior to the start of the Finals tournament, i.e., by mid-2024 for the 2028 Euros.

Extrapolating from the many missed deadlines that have befallen the project to date, even a mid-2024 start date looks optimistic without a contractor in place at this late stage. It is therefore highly likely that a further exemption would have to be sought for the continued inclusion of Casement Park in the 2028 Euros. Alternatively, UEFA may feel compelled to seek a replacement venue, to mitigate the risk of further delay and so that UEFA could adhere to its own timelines. In fact, as reported in *The Times*, UEFA is increasingly concerned that Casement Park will not be ready for the 2028 Finals and is drawing up contingency plans to deal with that possibility²⁵.

It should also be noted that the previous procurement exercise was subject to legal proceedings brought by unsuccessful bidders²⁶. The threat of such proceedings poses a further risk to the timescale for construction of the stadium.

Second, with the costs remaining unspecified, **a funding package has not yet been agreed**. But there is significant political opposition to giving the GAA a blank cheque in the face of rapidly rising construction costs, particularly in light of the tight

²² The Irish News, *Casement Park needs new main contractor after Heron Bros exit*, 24 November 2023, at

https://www.irishnews.com/sport/gaa/football/2023/11/24/news/casement_park_needs_new_contractor_after_heron_bros_exit-3798695/.

²³ The Irish News, *Stormont-linked body to recruit Casement Park technical director*, 8 February 2024, at <https://www.irishnews.com/news/northern-ireland/stormont-linked-body-to-recruit-casement-park-technical-director-PPZLYILWCFHOJQCHSTZL3FLSY/>.

²⁴ GAA project sponsor interview with BBC, posted on X (formerly Twitter) on 25 November 2023, at <https://twitter.com/BBCMarkSimpson/status/1728352224982737021?s=20>.

²⁵ The Times, *Euro 2028 organisers fear Casement Park won't be ready*, 31 January 2024, at <https://www.thetimes.co.uk/article/belfast-to-lose-euro-2028-matches-if-casement-park-is-not-ready-g0ccjn3zm>.

²⁶ Belfast Telegraph, *Legal challenge over £70m Casement Park redevelopment 'is settled'*, 7 November 2013, at <https://www.belfasttelegraph.co.uk/news/northern-ireland/legal-challenge-over-70m-casement-park-redevelopment-is-settled/29735658.html>.

constraints on public sector expenditure in Northern Ireland. There is a very strong feeling in a number of quarters that, having regard to the array of unmet needs in health, education and so on, the hugely increased expenditure required to build Casement Park is simply not justified²⁷.

Reflecting the constraints, Sir Jeffrey Donaldson has stated that: “We are very clear, the (Stormont) Executive doesn’t have money, the additional money that is required for this stadium.”²⁸ Sir Jeffrey also pointed to the rising costs of the proposed redevelopment, in the following terms: “It is massive the amount of extra money that is now required, over and above what was set aside by the Executive.”

Furthermore, from local media reports²⁹, there would appear to be a view emerging that, whatever cost estimate is arrived at, the financial envelope should be kept under wraps until the procurement process has concluded. But given the size of the shortfall that currently exists between what is known to be available for the project and what would ultimately be required to get the stadium built, that signals a lack of transparency that is inconsistent with public expenditure principles such as regularity and propriety.

Specifically, the Northern Ireland Assembly has previously voted to allocate £62 million for Casement, in the 2016-17 Budget, but £12 million of that has been spent already, leaving £50 million still available. In addition, the Irish Government has promised £43 million, and the GAA have committed £15 million, albeit they are refusing any further increase in their contribution³⁰. That adds up to £108 million in voted funds and commitments made. With the costs now lying somewhere between £220 million and £308 million, there is therefore a shortfall of somewhere between £112 million and £200 million (perhaps more than that).

But government Ministers cannot spend public money without parliamentary authority (the regularity principle). Presumably, the funds to cover the shortfall could be voted through, but would that be in Stormont or Westminster? In advance of contractor procurement or after? And a vote would surely take time to get sorted, but time is in diminishing supply for the now derelict Casement Park.

Third, the July 2021 planning consent includes a total of 46 conditions, a number of which **need to be met before development works can begin**, including:

- A final Construction Environmental Management Plan (CEMP), which must be submitted at least 8 weeks prior to the commencement of site works associated with the development (Condition number 2).

²⁷ See, for example, the Editorial in the News Letter of 17 November, 2023, titled *The huge costs to the public of the Casement GAA stadium are not justified*, at <https://www.newsletter.co.uk/news/opinion/editorial-the-huge-costs-to-the-public-of-the-casement-gaa-stadium-are-not-justified-4413256>.

²⁸ Belfast Telegraph, *Jeffrey Donaldson raises 'big questions' over Casement Park funding and Euro 2028*, 11 October 2023, at <https://www.belfasttelegraph.co.uk/sport/football/international/jeffrey-donaldson-raises-big-questions-over-casement-park-funding-and-euro-2028/a942025444.html>.

²⁹ Notably the 21 February 2024 discussions on BBC's *The Nolan Show* and Talkback.

³⁰ BBC News, *GAA says £15m contribution to Casement Park is near its limit*, 21 February 2024, at <https://www.bbc.co.uk/news/uk-northern-ireland-68354653>.

- Implementation of measures set out in the CEMP for treatment and removal of Japanese Knotweed, which is present on the site (Condition number 3).
- Preparation of a piling risk assessment (Condition number 4).

Those precedent conditions have not yet been satisfied. In particular, as of February 2024, no application had been submitted seeking to discharge any of the planning conditions³¹. It may also be presumed that, without a main contractor in place, the GAA would be unable to submit a CEMP until the procurement process was completed, casting further doubt on the feasibility of a mid-2024 start.

On that point, it should be noted that, on 19 February 2024, the GAA sent workers on site to undertake what they described as “pre-enabling and enabling works, including site clearance”³². That work was most likely initiated in advance of a UEFA site visit scheduled for week beginning 26 February 2024, to show progress being made.

However, the work presently ongoing at the Casement Park ground would appear to be a clear breach of planning Conditions 2 and 3. In response, therefore, a number of local residents have submitted complaints to the planning authorities calling for enforcement of those conditions, i.e., for the GAA to cease works until a CEMP has been submitted. At the time of writing, the investigation into the alleged breaches is ongoing.

But even if the construction of Casement Park was to start, the project would continue to face **risks of further delay to timely completion**. For example, **the site is known to be contaminated** with asbestos³³. Thus, condition 7 of the planning consent requires work to be ceased if new contamination or risks are encountered. A remediation strategy is required if the risks are unacceptable. Since asbestos is known to be present on the site, it is entirely possible that such risks will materialise.

Finally, as discussed above, the intention to build a stadium with a 30,000 net seating capacity, with ‘temporarily permanent’ seating in the South Stand, may represent a material change to the design for which planning permission was granted. If that was to be the case, **proceeding with the construction of such a stadium would require a fresh planning application**. In that scenario, **failure to do so would risk enforcement action at a later stage**, jeopardising the availability of the stadium for the 2028 Euros. That is to heighten the risks of providing public funding, in the order of hundreds of millions, for construction of a stadium that does not accord with the approved plans.

³¹ Based on a search of the NI Planning Register.

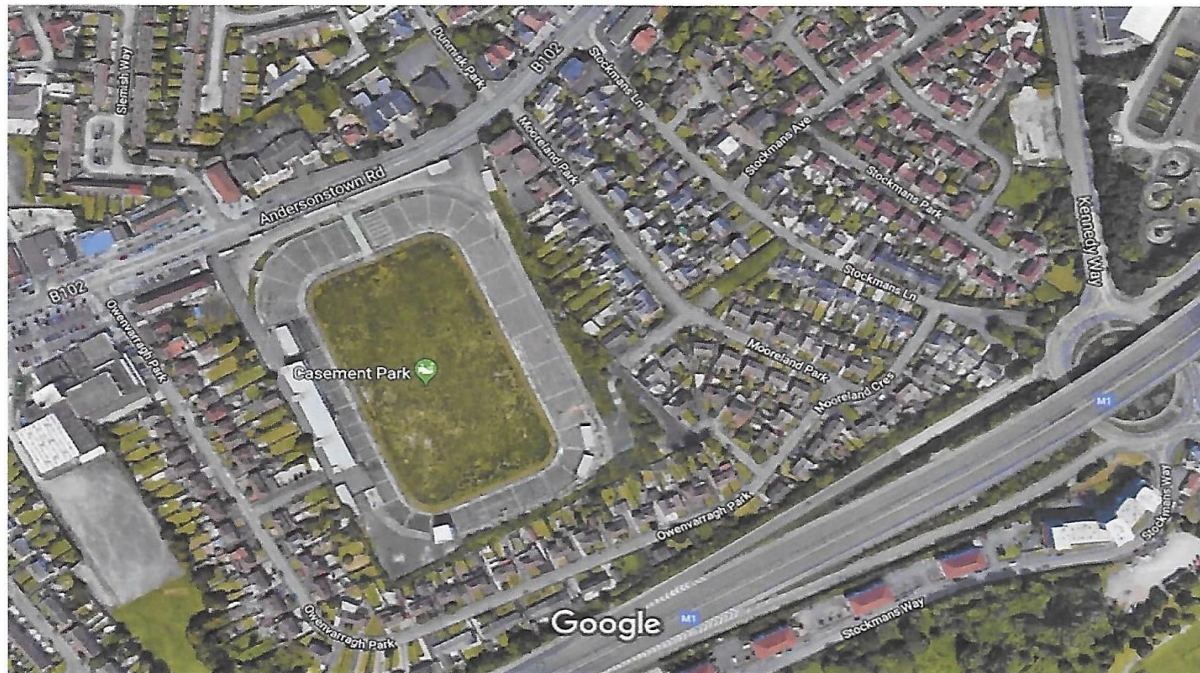
³² As described in a leaflet circulated by the GAA to local residents on 15 February 2024.

³³ For further detail, see the paper titled *Casement Park is a Contaminated Site*, available on request.

Could the Stadium be Certified as Safe?

From the outset, the proposed re-development of Casement Park has been seriously hampered by the very constrained location of the site, due to being situated in a densely populated residential area and tightly bounded on three sides by the horseshoe of Mooreland and Owenvarragh (see Figure 1).

Figure 1 The Casement Park site



Imagery ©2018Google, Map data ©2018Google

Owing to the horseshoe configuration and consequent reliance on exiting via the Andersonstown Road, the project has been dogged by **concerns around safe evacuation in the event of an emergency resulting from a closure of the Andersonstown Road exits³⁴**.

Safe evacuation was not assessed as a material consideration in the planning permission that was granted in July 2021. The planning approval gives permission for a stadium to be built and no more than that. **Safety certification is a separate process** that can only occur if the stadium is ever built.

Furthermore, a new stadium would have to go through a 'bedding-in' process before the competent authority is in a position to definitively assess the safe capacity of the ground. It is not possible to say how long that 'bedding-in' process might take. In other newly opened stadia, such as the Emirates in 2006, it has been necessary to stage 'ramp-up' events to obtain the desired safety certificate.

³⁴ For a more detailed discussion, see *The Case against an Oversized Casement Park* and also the paper titled *The Stockmans Lane Roundabout is NOT a Safe Evacuation Route*. Both papers are available on request.

Reflecting its constrained location, it is likely that, if it is built, Casement Park would have to go through a more extended 'bedding-in' period.

For example, there would be a need to develop operational contingency plans for scenarios such as the use of the Stockmans Lane roundabout underneath the M1 motorway (see Figure 1) in the event of an emergency evacuation due to closure of the Andersonstown Road. Those plans would take time to design and test and would not necessarily yield a satisfactory solution.

Consequently, Casement Park represents a high-risk venue for the UEFA finals in respect of crowd capacity and safety.

Assuming construction actually started in mid-2024 (which cannot be taken as read) and further assuming no delays due to, for example, contamination, it would be summer 2027 before the stadium was completed. The GAA has acknowledged that would be too late to stage the 2027 Ulster Football Championship (UFC) Final in Casement Park³⁵. While the GAA hopes to stage a series of warm-up events in the months leading up to the Euros, the UFC Final is the only event on the GAA calendar that would attract a full-capacity crowd to a redeveloped Casement Park. By summer 2028, when the Euros come around, it is not at all unrealistic to say that the stadium would still not have previously been tested at full capacity.

In any event, even if the Casement Park stadium was to receive a safety certificate, UEFA requires that, **prior to the tournament, the stadium safe capacity must be re-approved** by the relevant authority (Belfast City Council)³⁶. From UEFA's perspective, that is because temporary infrastructure would need to be set up at the stadium, as outlined in the next section of this paper. The need for re-certification would also be driven by:

- The likelihood that the venue would have a high security risk rating, which would result in a slower rate of entry to the stadium, thereby affecting the stadium's entry capacity as measured by the sixth edition of the Sports Ground Safety Authority (SGSA) Guide to Safety at Sports Grounds ('the Green Guide'), which is recommended for use in Northern Ireland.
- The poor level of access to the stadium, which is highly reliant on one main route, i.e., the Andersonstown Road, accounting for an estimated 60% of entry capacity with the remaining 40% funnelled through just three relatively narrow entrances within a network of small local side-streets.

And all the above considerations must factor in the possibility of a legal challenge to any award of a safety certificate at the Casement Park location. Reflecting its lack of support among many residents, the project has already been the subject of two legal challenges.

³⁵ BBC News, *GAA says £15m contribution to Casement Park is near its limit*, 21 February 2024, at <https://www.bbc.co.uk/news/uk-northern-ireland-68354653>.

³⁶ UEFA, [Tournament Requirements: UEFA Euro 2024](#), Sector 06, p 5.

Could the Tournament Infrastructure be Provided?

UEFA has stringent and extensive **infrastructure requirements**, as follows³⁷:

*A UEFA EURO Stadium has a **much bigger footprint** than a stadium which is used for regular league games, European club competition or international matches. **The Stadium needs to accommodate and facilitate additional needs of media and broadcast operations, hospitality and commercial activities as well as logistics and transport undertakings.***

*Therefore **the regular operational perimeter of the Stadium will be extended to encompass all exploited adjacent areas for tournament purposes.** This perimeter is called the outer (security) perimeter and is physically marked by a **fenced-off line**: during the exclusivity period it is **under UEFA's sole control.***

During the set-up phase all the necessary adaptations and upgrades to the existing and temporary built infrastructure are made, changes to operational procedures are agreed and implemented in order to establish the so-called "UEFA EURO overlay" on the Stadium which facilitates smooth and efficient operations and ensures the provision of the required service levels to the different target groups on-site. [Emphases added]

In particular, UEFA's mandatory "must requirements" for the outer perimeter of the stadium include additional space for temporary facilities around the stadium. The UEFA illustration of those requirements is reproduced below as Figure 2.

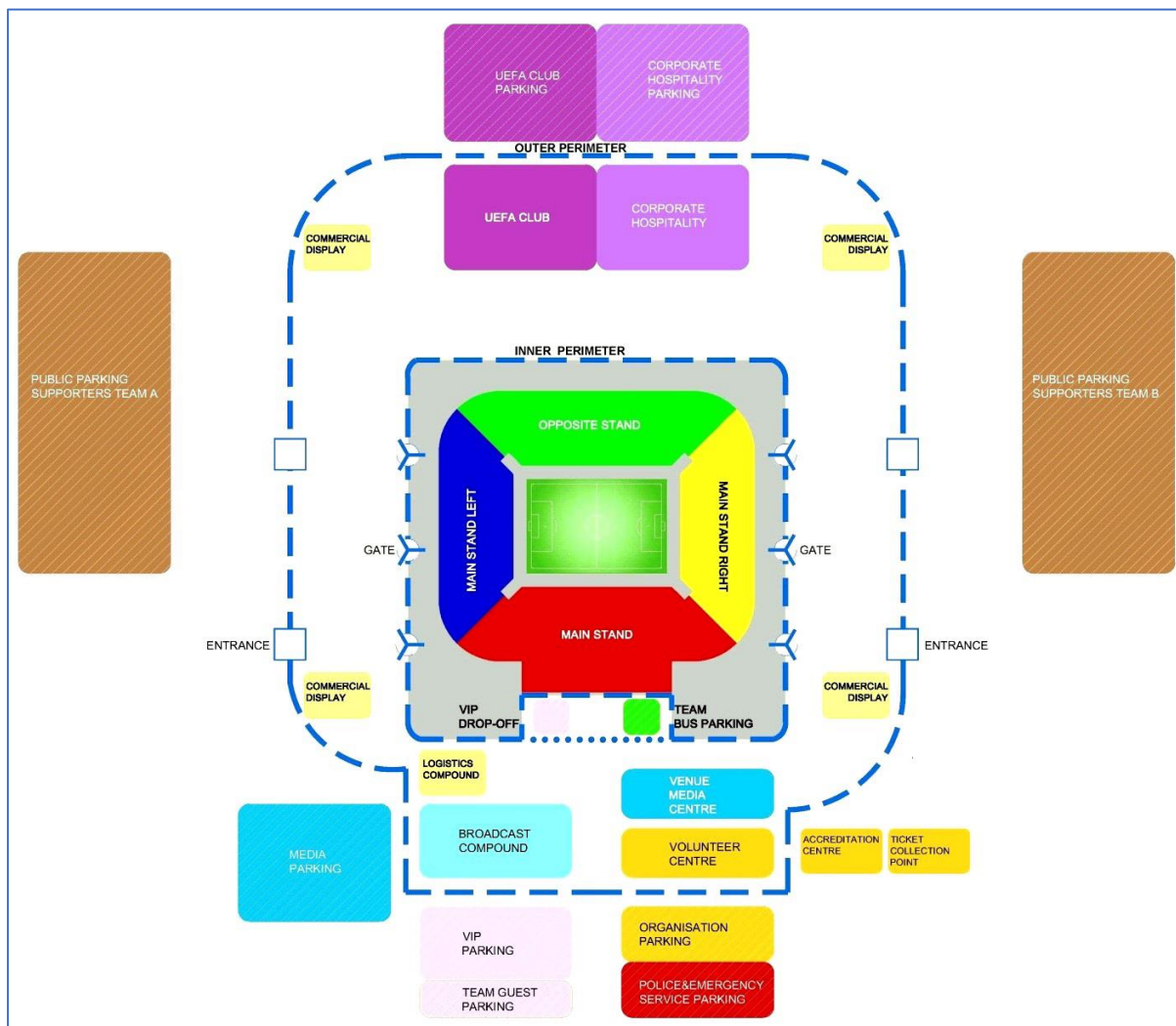
Comparing UEFA's outer perimeter overlay with Figure 1 above, it is clear that **the Casement Park site could not possibly meet UEFA's infrastructure requirements.**

The site is surrounded on three sides by the horseshoe of Mooreland and Owenvarragh and fronts onto a busy arterial road. Consequently, it would be physically impossible to meet the UEFA requirement that "the regular operational perimeter of the stadium will be extended to encompass all exploited adjacent areas for tournament purposes".

The only possibility for meeting that requirement would be to disperse the infrastructure components (broadcast compound, media centre, volunteer centre, etc.) across the local area. That would mean yet another exemption from strict adherence to UEFA bid requirements to facilitate the inclusion of the proposed Casement Park stadium.

³⁷ UEFA, [Tournament Requirements: UEFA Euro 2024](#), Sector 06, p 6.

Figure 2 UEFA infrastructure requirements: Illustration of a generic organisation of the Stadium overlay with the outer security perimeter



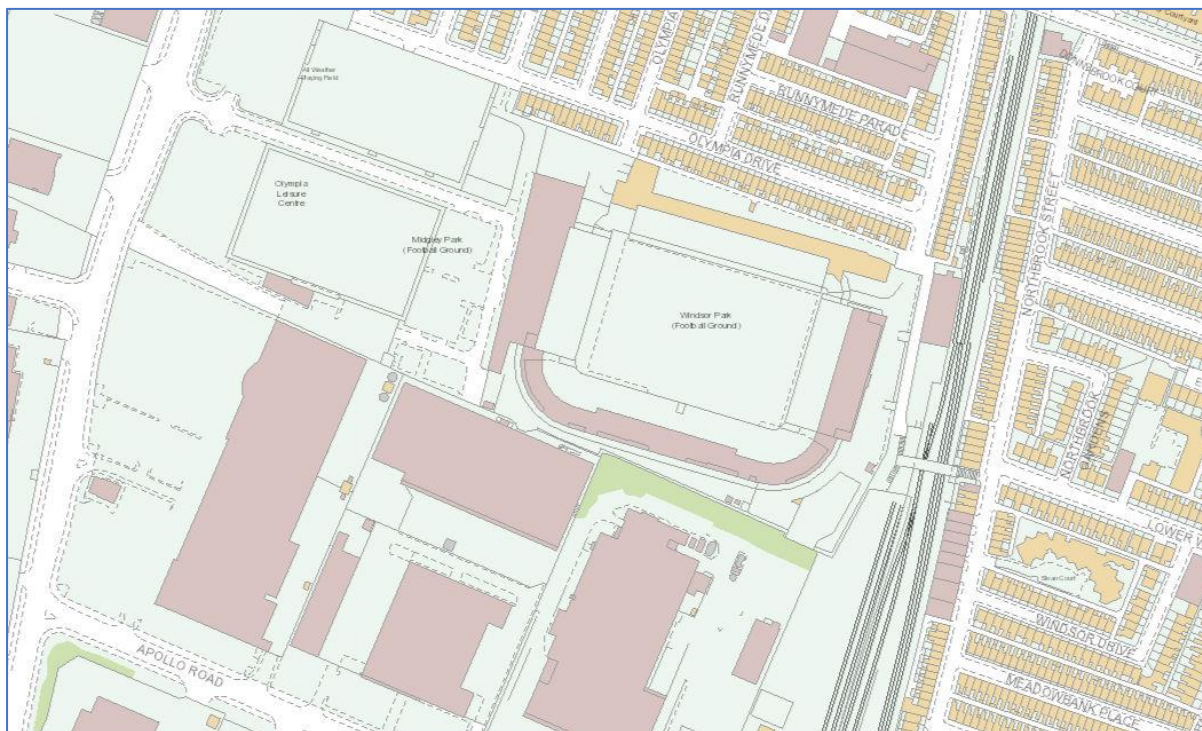
Source: UEFA, *EURO 2024 Tournament Requirements*, Sector 06, page 6.

But even if appropriate sites could be locally sourced for dispersal of the infrastructure sites, which is **not** a given, that would surely require statutory permissions³⁸ and would encounter strong local opposition. Alternatively, the infrastructure components would have to be located at some distance from the stadium. For example, in a site such as the Boucher Playing Fields, located over one mile from the Casement Park site along a route that encompasses a busy motorway underpass (the Stockmans Lane roundabout).

Indeed, when considered in terms of accommodating UEFA’s infrastructure requirements, the Windsor Park site offers a much more favourable prospect. As can be seen from Figure 3, the Windsor Park site is adjacent to the expansive Olympia Leisure Centre Playing Fields.

³⁸ The UEFA availability period for infrastructure around Casement Park would be about 15 weeks (including set-up). Temporary structures can be exempt from planning permission and some building control regulations, but that only covers structures that will be in place for no more than 4 weeks.

Figure 3 The National Stadium at Windsor Park



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Overall, the Windsor Park site is much less constrained when compared with the Casement Park site. For that reason, the costs of installing the UEFA infrastructure would likely be considerably lower at the Windsor Park site. And no exemption required.

How Would Spectators Get to the Stadium?

In addition to safety considerations, the Casement Park project has been beset with problems around traffic and access. Again, the site's constrained location is the main limiting factor.

The ground fronts onto one arterial road, i.e., the Andersonstown Road (B102). The road is wide enough to facilitate bus lanes on both sides, which are used by the Glider service running to and from the city centre. The Glider is the only form of public transport providing access to the ground from the city centre. Access is also available using the West Belfast taxi routes, albeit on a more limited basis. There is no train service to Andersonstown. The closest station is Balmoral, a small commuter halt located over two kilometres walking distance from the ground. The route to the ground from the Balmoral station includes passage through the busy Stockmans Lane motorway underpass.

Moreover, the local area does not have sufficient parking space to accommodate the number of vehicle trips that a major event at Casement Park would generate.

Reflecting the above constraints, **traffic and access difficulties** were a major focus of attention in the DfI's consideration of the Casement Park planning application.

In their planning application to DfI, the GAA's approach to mitigating the impact of large numbers of spectators travelling by car (the typical mode of travel for GAA spectators) was to devise what they termed a Transport Tool-kit, allied to an Event Management Plan (EMP) which purported to set out "the arrangements required to manage transport and traffic movements for events".

Crucially, the GAA's traffic management planning has, to date, been focused entirely on spectators travelling by car to GAA matches from locations dispersed across Ulster, such as Tyrone, Derry, etc. The GAA's Tool-kit was **not** constructed with reference to events such as the Euro finals, which would be expected to primarily rely on **intra-city travel**, within Belfast, including visitors from participating countries staying in accommodation across the wider Belfast area.

UEFA's requirements in relation to **location and accessibility** strongly reflect that requirement for intra-city travel, well-served by an efficient and extensive public transport infrastructure, as follows³⁹:

The UEFA EURO Stadium must be well connected to public transport hubs, such as trains, metros, trams and buses, in order to handle a spectator flow of up to 75% of the total Stadium capacity and minimise the environmental impact of fan transportation. Efficient public transport should be put forward and seen as the first way for fans to travel.

Reflecting its constrained location, **the Casement Park site comes nowhere near meeting UEFA's accessibility requirements**. The site is served by one bus route. The nearest train station is a small commuter halt located over two kilometres away, with the route involving pedestrian travel through a very busy motorway underpass.

Casement Park's public transport connectedness is a world away from stadia such as the José Alvalade Stadium in Lisbon, Portugal, where spectators are very well served by both bus and rail links. In that location, departing spectators are quickly absorbed back into the city. By contrast, spectators departing Casement Park would have to find their way through an unfamiliar network of local streets.

Nor does Casement Park meet the requirement for good access to main roads and motorways. For newly constructed stadia, UEFA requires that "at least **three main roads** from different directions should lead to the Stadium." **Casement Park is served by just one main road**. The nearest motorway exit (the Stockmans Lane roundabout) provides little relief, as it is already very busy and the off-ramp does not lead to a road connecting directly to Casement Park (see Figure 1).

The traffic and access problems that are inextricably linked to the Casement Park site would pose huge difficulties for UEFA in organising fan access to the stadium, including from any designated fan zones. It would also be extremely difficult, if not impossible, to meet the requirement that "crossovers between routes taken by the various target groups (VIPs, sponsors, media and fans) should be minimised at all times".

³⁹ UEFA, [Tournament Requirements: UEFA Euro 2024](#), Sector 06, page 11.

Again, **numerous exemptions from UEFA's stipulated requirements** would be necessary **to host Euro 2028 matches at a redeveloped Casement Park.**

And again, **the Windsor Park location is considerably more favourably situated in terms of meeting the accessibility requirements.** For example, as can be seen in Figure 3, the Windsor Park site is adjacent to a rail line. In addition, the site can be accessed via a number of routes, which would facilitate the requirement for minimisation of crossovers between routes taken by different groups.

What Legacy?

If **the GAA** are given a blank cheque to build a new stadium at Casement Park, they **would certainly gain a lasting legacy from the 2028 Euros.** That legacy of **an oversized new stadium** would accrue regardless of whether the facility was built in time to host a single match at the 2028 Euro Finals.

The lasting benefits for other sections of the community are largely absent. That is especially true for the Northern Ireland football community.

In their letter of October 2023, the Amalgamation of Northern Ireland Supporters Clubs (AONISC) asked the IFA: **where is the legacy for local football?** The IFA's reply failed to articulate, in concrete and tangible terms, any lasting benefit for local football. Instead, the IFA presented the use of Casement Park to host the 2028 Euros as an "opportunity for better engagement between communities". That is, improved community relations within the context of, in the IFA's words, "people ... still on a journey after a difficult past."

Unfortunately, the evidence to date suggests that building Casement Park on the back of the 2028 Euro Finals is **more likely to damage than to enhance community relations.** There are at least three main reasons for that conclusion:

- Casement Park is not a neutral venue.
- While football is popular within both main communities, Gaelic sports are almost exclusively the preserve of the Catholic community.
- The absence of promised financial support for development of football grounds gives rise to unequal treatment across the two main communities.

Certainly, the two main communities are sharply divided on the use of Casement Park for the 2028 Euro Finals. In a recent opinion poll, 69% of those from a unionist background said they were against Euro 2028 games being played at Casement Park⁴⁰. A majority of unionist respondents (61%) said they would prefer that no matches were played in Northern Ireland at all rather than having the Finals staged at Casement Park.

⁴⁰ Belfast Telegraph, *Majority favour Euro 2028 games at Casement but unionists remain firmly opposed*, 4 November 2023, at <https://www.belfasttelegraph.co.uk/sport/football/international/majority-in-ni-support-euro-2028-games-at-casement-but-unionists-remain-opposed/a534700187.html>.

By contrast, 94% of respondents from a nationalist/republican background said they were in favour of Euro 2028 games being played at Casement Park.

The contrast matters because support for the Northern Ireland football team is mainly drawn from the protestant/unionist community while the catholic/nationalist/republican community mainly supports the Republic of Ireland team.

By their nature, opinion polls do not provide any deep explanation for variations in the responses that people make to questions of topical interest. Nonetheless, the following points can be noted.

First, from a unionist perspective, Casement Park has historical ‘baggage’ which is likely to adversely affect the extent of that community’s support for the use of the venue at the 2028 Euros⁴¹.

Second, beyond the 2028 Euros, Casement Park would function primarily as a Gaelic sports ground⁴². Thus, when the planning approval was announced in July 2021, the GAA hailed it as a “momentous occasion for Gaels”⁴³. But only a minute proportion of those from the protestant community are engaged in Gaelic games, whether as participants or spectators⁴⁴. That is, in the longer term, the stadium would almost exclusively serve just one of the two main communities.

Furthermore, the intention to revert, post the 2028 Euros, to a standing terrace in the South Stand would greatly reduce the prospect of Casement Park serving as a multi-sports venue. UEFA does not permit spectator standing and the permanent seating capacity would be a figure less than 26,000, not hugely in excess of Windsor Park’s 18,500.

In addition, the GAA has a policy of “ensuring that its grounds and facilities are used exclusively for promotion of [the GAA’s] own games and activities”⁴⁵. One of the reasons for the policy is that: “The Association would lose the advantage that its facilities provide it with in competing with other – often professional and commercially driven – sports”. As set out in Rule 5.1, exceptions can be granted “**from time to time** by Central Council” [Emphasis added]. For example, the GAA has previously permitted the use of its main stadium in Dublin (Croke Park) for use by football and rugby, when those sports’ own stadium (the Aviva) was under construction. However, the policy thrust continues to emphasise exclusivity.

⁴¹ For example, the murders of corporals Wood and Howes in 1998 and the use of the ground for a republican hunger strike rally in 2006, widely viewed as a political event.

⁴² The stadium would also seek to hold concerts, in an effort to make the venue financially viable.

⁴³ GAA, 28 July 2021, *Momentous occasion for Gaels following Casement Park planning application*, at <http://www.casementpark.ie/>.

⁴⁴ Survey data show that only a very small fraction of protestants (around 0.2%) attend Gaelic games as spectators, compared with about 10% of Catholics. The disparity also shows in TV viewership figures. According to the Northern Ireland Life and Times Survey, when asked about sports that they watch “a lot” on television, one in three Catholics mentioned Gaelic football matches, compared to just 2% of protestants.

⁴⁵ *Use of GAA Property*, 2019, available at <https://www.gaa.ie/api/pdfs/image/upload/sh4hdm2h24c78s4x9jwx.pdf>.

There is, therefore, a strong likelihood that, beyond the 2028 Euros, Casement Park would function, in sporting terms, exclusively as a Gaelic sports venue.

In addition, the funds promised for upgrading of football stadia across Northern Ireland, via the Sub-regional Stadia Programme, are in danger of being left behind, if not squeezed out entirely by the amount of funding that would be required to build the Casement Park stadium.

When the Northern Ireland Executive announced a package of support for sports stadia in March 2011, the funding allocations for football and the GAA were scrupulously balanced. That was because Gaelic games is rooted within the Catholic-Nationalist community while organised soccer is perceived to be mainly within the Protestant-Unionist community, especially support for the Northern Ireland national team. Consequently, the funding decision was inherently a matter of **cross-community concern** within the Northern Ireland context⁴⁶.

To ensure parity of treatment, football and Gaelic were allocated precisely equal amounts of funding, i.e., £61.4 million each⁴⁷.

The GAA chose to earmark all their allocation to the proposal to redevelop Casement Park, initially aspiring to a capacity of 42,000, under the umbrella of the Regional Stadia Programme.

By contrast, the IFA proposed splitting their allocation between the refurbishment of what is now the National Football Stadium at Windsor Park (£25.2 million, also under the Regional Stadia Programme) and the upgrading of soccer stadia across the province, i.e., the Sub-regional Stadia Programme, for which £36.2 million was allocated.

Thus, the redevelopment of Casement Park and the Sub-regional Stadia Programme are inextricably linked in maintaining **parity of treatment** for the two main communities in sports infrastructure funding. In particular, the Sub-regional Stadia Programme allocation played the critical role in balancing the financial allocations between the two sports, football and Gaelic⁴⁸.

Furthermore, the Sub-regional Stadia Programme is also a 'designated flagship project', holding the same policy status as Casement Park. Similar to Casement Park, the Sub-regional Stadia Programme was one of the projects listed as a political commitment in the *New Decade, New Approach* deal which underpinned the return of the NI Executive in January 2020⁴⁹.

⁴⁶ For a more detailed discussion of this issue, see *The Case against an Oversized Casement Park*, available on request.

⁴⁷ In addition, the sport of rugby was awarded £14.7 million.

⁴⁸ It may be noted that the allocation of £25.2 million for a regional football stadium was drawn down, as was the rugby allocation under the Regional Stadia Programme of £14.7 million. However, both football and rugby undertook relatively modest upgrading of their respective stadia (the National Stadium at Windsor Park and the Kingspan Stadium for rugby), in contrast with the GAA's decision to build a completely new stadium to a much larger scale than the current Casement Park ground.

⁴⁹ UK and Irish Governments, *New Decade New Approach*, January 2020, page 8, available at <https://www.gov.uk/government/news/deal-to-see-restored-government-in-northern-ireland-tomorrow>.

Notwithstanding its policy status, the Sub-regional Stadia Programme has yet to be implemented and, to date, no funds have been disbursed⁵⁰.

However, in sharp contrast to Casement Park, the UK government shows no interest in providing the necessary funds. In May 2023, the Secretary of State, Chris Heaton-Harris, said that the IFA will have to bid again for funding for the Sub-regional Programme and will have to do so against “other important things”⁵¹.

Since that statement was made, the Northern Ireland Executive has been re-formed with a DUP Minister (Gordon Lyons) in charge of the Department for Communities. Minister Lyons has stated that additional funding for Casement Park should be linked to the Sub-Regional Stadia Programme, in the following terms⁵²:

What we do need to have as well, if there will be additional UK public funds committed to Casement Park, I think it is important that we see that investment in football as well.

The problem is that, to ensure equality of treatment between football and Gaelic, which was a critical ingredient in the original stadia funding package, the allocation to the Sub-regional Stadia Programme would need to be increased from the £36.2 million promised in March 2011 to “more than £100 million”⁵³. That money has not yet been found.

In short, finding the money for Casement Park to serve as a host venue for the 2028 Euros risks leaving **a legacy of damaged community relations**. And **no legacy at all for the football supporting community**.

Two final points may be made regarding a Casement Park stadium legacy. First, there is **no compelling sporting need for a 34,500 capacity GAA stadium**⁵⁴. As a Gaelic games facility, the ground would attract a full capacity attendance only for the annual Ulster Football Championship Final, i.e., once per annum so long as the Final was actually played at Casement. But that cannot be guaranteed, as Ulster already has a venue for hosting Final matches (St. Tiernach’s Park in Clones, County Monaghan).

⁵⁰ The Department for Communities (DfC) is the funding body for the Sub-regional Programme, as well as for Casement Park. In December 2016, under a DUP Minister, DfC was on the verge of issuing a consultation paper for progressing the Sub-regional Programme. The consultation was aborted following the collapse of the Executive in January 2017, due to the withdrawal of Sinn Féin from the Executive. When the Executive returned in January 2020, DfC came under a Sinn Féin Minister and little progress was made in the period up to the withdrawal of the DUP in February 2022.

⁵¹ Belfast Telegraph, *Irish FA will have to bid again for stadium funding, reveals secretary of state Chris Heaton-Harris*, 20 May 2023, at <https://www.belfasttelegraph.co.uk/sport/football/irish-league/irish-fa-will-have-to-bid-again-for-stadium-funding-reveals-secretary-of-state-chris-heaton-harris/878748624.html>.

⁵² BBC, *Casement Park: ‘Considerable amount’ still needed for project, says Gordon Lyons*, 13 February 2024, at <https://www.bbc.co.uk/news/uk-northern-ireland-68287430>.

⁵³ Stated by the CEO of the Irish Football Association, in a reply to questions from the Amalgamation of Northern Ireland Supporters Clubs (AONISC).

⁵⁴ For further discussion, see the paper titled *The Case against an Oversized Casement Park*, available on request.

Furthermore, there exists more than sufficient capacity across the various county grounds in Ulster for the remaining matches in the Ulster Football Championship, as well as All-Ireland qualifiers and other GAA events. Those are well-recognised facts. For example, writing in *The Irish News*, Northern Ireland's main nationalist newspaper, Cahair O'Kane wrote that⁵⁵:

Antrim absolutely needs Casement Park, as soon as possible. But they do not need a 34,000-capacity stadium. It would dwarf their needs as a county.

In the same article, O'Kane went on to note that the only GAA game capable of filling Casement Park would be the Ulster football final. He correctly pointed out that Ulster Football Championship semi-finals only rarely attract crowds in excess of 20,000 and can readily be accommodated by a range of other venues across the province⁵⁶. A capacity of 15,000 would be more than adequate for Antrim, which is one of Ulster's least successful counties in Gaelic sports.

The key problem facing the GAA in using Casement Park to its full capacity is that **there are simply too few 'big' games available outside those played at Croke Park**, the principal GAA stadium, located in Dublin. As Sean Moran, writing in *The Irish Times*, has noted⁵⁷:

The [GAA's] stadium policy has evolved to accommodate individual counties' hopes of getting big matches, ideally ones in which they're involved but if not, fixtures in search of neutral venues. ... there simply aren't enough big events to go around.

That raises value-for-money risks to public funding of the planned Casement Park and **calls into question the viability** of the proposed stadium **as a sports venue**. In addition, as it would **duplicate capacity already available elsewhere**, staging matches at Casement Park would entail diverting fixtures that would otherwise have taken place in one of the GAA grounds outside Antrim. Consequently, shifting matches to Casement Park would not generate additional province-wide attendances over and above what would happen anyway, in the absence of a redeveloped Casement Park. That **displacement effect** further undermines the value-for-money proposition presented by the redevelopment of Casement Park.

Second, the proposed Casement Park stadium has been strongly opposed by local residents. That reflects **the lasting negative effects on the community** from living

⁵⁵ O'Kane, Cahair, *Antrim badly needs a new Casement – but half the size would do it*, *The Irish News*, 13 November 2018, at <https://www.irishnews.com/sport/gaafotball/2018/11/13/news/kicking-out-antrim-badly-needs-a-new-casement---but-half-the-size-would-do-1483534/>.

⁵⁶ Each of the eight other Ulster counties outside of Antrim has their own sports ground. The largest is St. Tiernach's Park in Clones, County Monaghan, with a current capacity of 29,000 (reduced due to safety considerations from 35,000 in 2012). The remaining grounds have capacities in the range 17,000 (Celtic Park, Derry) to 26,000 (Kingspan Breffni Park, Cavan). Between 2010 and 2019, 81 Ulster Football Championship matches were played at those eight venues. Over that period, attendances averaged 15,781, representing just 63% of the available capacity.

⁵⁷ Moran, Sean, *Sometimes less is more when it comes to suitable venues*, *The Irish Times*, 8 May 2013, <https://www.irishtimes.com/sport/sometimes-less-is-more-when-it-comes-to-suitable-venues-1.1385363>.

in the shadow of an oversized stadium. The planning report made in August 2020 by the Department for Infrastructure (DfI) concluded that:

The [Casement Park redevelopment] proposal is not in accordance with criterion 1 of Policy OS4 PPS 8⁵⁸ in so far as the proposal will have an unacceptable impact on the amenities of people living nearby by reason of overshadowing, loss of light and general disturbance. These impacts are not inconsequential and weigh significantly against the proposal. (Para 5.1).

Nonetheless, DfI recommended approval of the planning application for Casement Park on the basis of “the potentially transformative socio-economic nature of the proposal” (para 7.3). But the hypothesised “potentially transformative” impact is entirely speculative. Indeed, the evidence shows that large sports grounds simply do not deliver transformative regeneration effects⁵⁹. By contrast, the acknowledged negative amenity impacts are guaranteed to transpire if the stadium is ever built. That is the true legacy of an oversized trophy stadium.

The absence of a transformative regeneration effect is also evident from the socio-economic statement submitted by the GAA in support of its planning application for the redevelopment of Casement Park⁶⁰. In what appear to be 2015 prices, the Deloitte socio-economic statement projected that, for Northern Ireland as a whole, the stadium would generate an annual net Gross Value Added (GVA) impact of £1.683 million along with a net employment impact of 37 jobs⁶¹.

Comparing those projected ‘steady-state’ impacts with the expected (as of 2017) public spend of £62.5 million yields the following summary indicators:

- A ‘payback’ period of 37 years, i.e., £62.5 million divided by an annual GVA impact of £1.683 million.
- A projected cost per job of £1.689 million.

Those ratios certainly do not presage a ‘transformative’ regeneration impact. Bearing in mind the Deloitte report was an impact assessment, and not a Green

⁵⁸ Planning Policy Statement (PPS) 8 sets out material planning considerations in the assessment of proposals relating to *Open Space, Sport and Outdoor Recreation*. Policy OS 4 deals with Intensive Sports Facilities. Development proposals are required to meet each of four criteria. Criterion 1 stipulates: “there is no unacceptable impact on the amenities of people living nearby by reason of the siting, scale, extent, frequency or timing of the sporting activities proposed.”

⁵⁹ See, for example, Siegfried, J., and Zimbalist, A., 2006. “The economic impact of sports facilities, teams and mega-events”, *The Australian Economic Review*, 39(4): 420-427. They find that “sports facilities cannot be expected to stimulate local economies”. See also the What Works Centre for Local Economic Growth, 2014, *Sports and Culture: Evidence Review*, which concludes that “sport and cultural events have little or no lasting effect on the local economy”.

⁶⁰ Deloitte, *Casement Park Redevelopment: Socio-Economic Impact Assessment*, Final Report, January 2017, Table 1.4. Submitted with the Environmental Statement accompanying the GAA’s planning application for the redevelopment of Casement Park (Reference - LA04/20170474/F).

⁶¹ The Deloitte report appears to give little weight to the displacement effect from the diversion to Casement Park of Ulster Football Championship matches currently held at other Gaelic grounds in Northern Ireland. Consequently, the projected net benefits may well be over-estimated.

Book appraisal, it may also be noted that the projected cost per job and lengthy ‘payback’ period indicate a lack of cost-effectiveness in the Casement Park proposal.

Of course, it may be argued that the use of Casement Park as a venue for the 2028 Euros would potentially have, or contribute to, a transformative regeneration effect. That is not going to happen. The Euros are a one-off event. As noted by Michael Foley, sports journalist at *The Times*⁶²:

Big tournaments tend to operate similarly to vultures — they arrive, take over for a while, suck up the local dollar, and fly off again leaving nothing behind.

Furthermore, Casement Park would be a **GAA stadium, not a football stadium**. The GAA competes with football for participation and attendances. Consequently, to meet its own objectives, the GAA’s future use of Casement Park would effectively seek to shake off or leave behind any lasting sporting and cultural effects from the 2028 Euros.

Nor would the Euro Finals generate an economic impact on the scale necessary to justify an expenditure of £300 million or more. The expected economic impact of the 2028 Euros in Northern Ireland is not publicly available⁶³. However, an early indication of the Department for the Economy’s expectations was given, in a newspaper report of an interview with the then-Minister, dated March 2022, as follows⁶⁴:

For Northern Ireland, it is currently estimated that an investment of £101.6 million will yield a return of around £217 million.

That March 2022 estimate, which is out-dated and grossly over-states the benefits⁶⁵, predicted a net one-off economic impact in the order of £115 million (£217 million minus £102 million), i.e., after allowing for **the one-off costs of staging the tournament**⁶⁶, which are **over and above the Casement Park construction costs**. But that level of economic impact comes nowhere near justifying the cost of building a new GAA stadium for the specific purpose of hosting the 2028 Euros. That is, getting Casement built **specifically to serve as a venue for the 2028 Euros would not be cost-effective**.

⁶² The Times, *Casement Park can pay the bills – and fits the bill for Euro 2028*, 22 October, 2023, at <https://www.thetimes.co.uk/article/casement-park-can-pay-the-bills-and-fits-the-bill-for-euro-2028-2ft9jshhs>.

⁶³ A request for information on projected costs and benefits was submitted to the Department for the Economy. The Department responded by refusing to release the information.

⁶⁴ The Irish News, dated 25 March 2022, quoting the then-Economy Minister Gordon Lyons. <https://www.irishnews.com/news/northernirelandnews/2022/03/25/news/northern-ireland-unable-to-back-euro-2028-bid-says-stormont-minister-2624768/>.

⁶⁵ The estimate was based on “an indicative proposal for Northern Ireland to host seven tournament matches”. In reality, only three matches would be staged in Belfast, according to Martyn Ziegler, writing in *The Times* on 31 January 2024 (see footnote 25 above).

⁶⁶ Those one-off cash costs would include, for example, satisfying UEFA’s extensive requirements for temporary infrastructure as well as security and policing. There would also be indirect costs, such as disruption to road users from the traffic and travel generated by tournament matches.

The Way Forward

With the Casement Park project delayed once again, due to the need to find a new contractor as well as the uncertainties around funding and timescales, now is the time to reconsider the options.

For the reasons outlined in this paper, **Casement Park is not a suitable location** for hosting the Euro 2028 Finals.

Arguably, Northern Ireland does have a need for a 30,000+ capacity stadium, but for use as a multi-sports stadium. The fact that the Casement Park project has been resuscitated by the prospect of full capacity international football events provides evidence of need for a multi-sports venue. Ideally, such a stadium would be located in **a neutral venue** with **good transport access** and **ample external space for fan circulation**. A multi-sports stadium should also be held in **public ownership**⁶⁷. The Casement Park site meets **none** of those criteria. It is **not a neutral venue**; the location is highly constrained; and it would not be in public ownership.

However, at this juncture, **a new multi-sports stadium is a longer-term consideration** and could not realistically be considered a feasible option for hosting the 2028 Euros.

Adding additional capacity to the Windsor Park stadium is a serious option and worthy of appraisal. Admittedly, time is limited. It may not be feasible to design an extension, get planning permission and have the stadium operational at a 30,000 capacity in time for the 2028 Euros. Also, local residents may object, as is their right. But the option should at least be considered and subjected to a proper appraisal. The site is more suitably located than Casement Park and there would be an identifiable and tangible legacy for the football community.


Finally, there is the option of withdrawing Belfast as a Euro 2028 host venue. In addition to the huge risks of relying on Casement Park to successfully host the 2028 Euros, the costs are escalating. Building a new stadium at Casement Park would cost at least **£300 million**, probably more. That would be in addition to the costs of hosting the tournament. An estimate by the Department for the Economy, made in spring 2022, put the costs to Northern Ireland “in the region of £75.4 million”⁶⁸. That figure has doubtless risen significantly since spring 2022, probably above **£100 million**. In addition, the renewed drive to fund the Sub-Regional Stadium Programme to leave a lasting legacy for football would add another **£100 million**. **Spending north of £500 million to host the 2028 Euros would entail a huge opportunity cost and is really not sustainable in light of Northern Ireland’s budgetary position.** Funds diverted to hosting the 2028 Euros could be better spent in helping to tackle the acute social and economic needs that have come to the fore in a budget settlement that must be seen as a continuation of austerity.

⁶⁷ The Hull City Stadium is an example of a multi-sports stadium (soccer and rugby league) which was publicly funded and remains in public ownership (Hull City Council).

⁶⁸ The Irish News, dated 25 March 2022, quoting the then-Economy Minister Gordon Lyons. <https://www.irishnews.com/news/northernirelandnews/2022/03/25/news/northern-ireland-unable-to-back-euro-2028-bid-says-stormont-minister-2624768/>.

Annex A How Will UEFA's 30,000 Net Seating Capacity be Met? DfC Response to Information Request



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	Our reference:	DFC/2023-0255
22 December 2023		



ACCESS TO INFORMATION REQUEST

Thank you for your email, dated 4 December 2023, in which you requested the below information. This request is a follow-up from your request for information on 23 October 2023, which focused on permanent seating arrangements at the Casement Park Stadium. Your more recent request focuses on temporary seating arrangements at the Casement Park Stadium.

The Department has addressed your request under the Environmental Information Regulations (EIR 2004).

With specific reference to the hosting of the Euro 2028 Finals, my questions are as follows:

- *Will it be necessary to install temporary seating in Casement Park for Euro 2028 Finals matches?*
- *How many temporary seats would be installed in Casement Park for Euro 2028 Finals matches?*
- *If the precise number of required temporary seats is not yet known, what is the range of possibilities, at this time?*

Response: The Department does not hold information on temporary seating at Casement Park, as UEFA do not permit the use of temporary seating structures at Tournament venues.

In response to your query of 23 October 2023 relating to permanent stadium capacity, we explained that the Department does not hold information on proposals to redevelop Casement Park with a permanent net seating capacity of at least 30,000. In order to prevent a perception of contradictory information between responses, can we explain that the seated terrace to the south of the stadium will be constructed for a football configuration and after the tournament concludes in 2028, will be changed to a UCGAA configuration, with a standing terrace.

- *Is it proposed to allow standing spectators to be permitted to attend Euro 2028 Finals matches?*

Response: The Department does not hold information on standing spectators at Casement Park for the EURO 2028 Tournament, as UEFA require all Tournament venues to be fully seated.

- *What is the proposed total spectator capacity of Casement Park for Euro 2028 Finals matches?*

Response: The EURO Tournament fixtures that will be held at Casement Park will accommodate a total of 30,000 seated spectators in order to satisfy UEFA requirements.

If you are dissatisfied with this response and wish to request a review of our decision or make a complaint about how your request has been handled, you may ask for an internal review within two calendar months of the date of this letter. You should write to the Information Access Manager, Department for Communities, Level 5, Nine Lanyon Place, BELFAST, BT1 3LP, or send an email to foi@communities-ni.gov.uk.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a review of our original decision. The Information Commissioner can be contacted at:

Information Commissioner's Office Wycliffe
House
Water
Lane
Wilmslow
Cheshire
SK9 5AF

Please remember to quote the above reference number in any future communications on this matter.

Yours sincerely



Regional Stadia Programme Manager