

Tom J Coleman
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Cork

Planning Department
Cork City Council
City Hall
Anglesea Street
Cork.

15th March, 2017

ref: Planning Application No.: 1737279
Applicant's Name: Moneda Developments Limited
Development address: The Former Good Shepherd Convent site
Convent Avenue and Buckston Hill
Sunday's Well, Cork.

To Whom it May Concern:

I am the elected chairperson of the Community Action Group objecting to the Good Shepherd Convent Planning Application as described above. I and the members of the elected committee of this group, representing the local residents of the areas surrounding the proposed development hereby object to the granting of planning permission to Moneda Developments Limited for the development of the former Good Shepherd Convent and environs in the Sunday's Well area.

There are 10 principal grounds for objection and they are described in outline in the following sections. There is also a section of proposals for alternative uses for the site.

In general we are alarmed by the careless reporting of facts in the application, the sheer density of the population increase this proposal would bring to the area with all its attendant problems, the character of the development proposed, and the lack of meaningful consultation with residents in the affected areas. All these issues are treated in the following sections which form an integral part of our joint objection.

We ask you to consider our objections carefully and ensure that the development of the area of the Good Shepherd Convent is planned sympathetically and in a way that will stand to the future of our city.

Yours sincerely

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Co-signatories and members of the committee

William Sheehan

Barry Sheehan

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Andrew Sullivan

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Jurek Kirakowski

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Phil Allen

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Cathleen Bowen

Cathleen Bowen

Pat Carroll

Pat Carroll

Density

The number of residences proposed by the developers is inappropriate to the neighbourhood and such a large influx of residents will have a negative impact on the community and its limited commercial services.

The Central Statistics Office - Census 2011 - Electoral Division 17059 (Sunday's Well A): - Total population of this district was 649, with a total housing stock of 349.

By comparison, it is estimated that the planned development will house between 650 to 916 people. This is an increase of well over 100%.

The planning application is in contravention of the Cork City Development Plan 2015-2021, specifically Table 16.4: Indicative Targets for Dwelling Size and Distribution. The distribution proposed is shown on the left of the table below; the Indicative Targets for Zone 3 (mixed house/ apt schemes) are shown on the right:

Proposed Development and Indicative Targets From CCDP 2015-2021

Development Proposal		Indicative Targets
45 x 1 bed apartments	(19%)	Max 20%
154 x 2 bed apartments	(66%)	Min 30%
35 x 3/3+ apartments	(15%)	Min 50%

The preponderance of 1 and 2 bedroom apartments does not conform to the Cork City Development Plan 2015-2021 and is not sympathetic to the residential aspect of the neighbourhood, which is predominantly family housing. This density of smaller units could become a new, separate neighbourhood of temporary residents with little or no connection or commitment to Sunday's Well, especially if a significant number of units are purchased as "buy to let" by prospective landlords.

The total number of apartments should be reduced, and the balance of 1, 2 and 3+ apartments should conform to the Council's indicative targets.

The proposal to site all Social Housing units in a single block (A1) does not encourage integration and could lead to ghettoisation. Social Housing in this development should also target families in need of permanent accommodation, not temporary shelter.

Traffic

The Sundays Well area was developed prior to the Planning Act of 1963. No provision was considered regarding motor traffic or parking needs, as such requirement did not prevail then.

Traffic growth and parking need has increased continuously throughout the area without any provision other than widening of a short stretch of Sundays Well road, resulting in growing congestion there and on the parallel radial at Blarney Street.

This growth in demand is fuelled by exceptional industrial growth (Apple Computers) already completed to the north-west, and extensive residential development under construction at Kerry Pike (in excess of 140 residences).

There has been a very large increase in numbers of private motor vehicles in existing residential areas in the Hollyhill / Knocknaheeny areas in recent years, using both Sundays Well road and Blarney Street to access the City Centre.

Public transport provision is at present poor. However, additional scheduled public transport on those narrow routes would exacerbate an already very serious traffic flow problem.

It is not possible to provide adequate parking for existing and subdivided residential properties on Sundays Well road due to unavailability of suitable space, together with the unique topography of the area. The significant local traffic increase which would occur due to further residential development on the scale proposed would result in serious deterioration of an already congested area and would not be in accordance with the proper planning and development of the area.

The proposed development intends to accommodate between 650 and 900 young professionals. In the absence of any public transport, adequate pedestrian footpaths or plausible cycle routes, these prospective residents will have no other option but to rely on their cars as their primary mode of transport to work and to other amenities such as shops and schools.

This development will result in a profound increase in traffic on steep and narrow roads that are not currently fit for purpose given the volume of traffic they must accommodate at this moment in time. The traffic increase will negatively effect the quality of life of existing residents.

In the Environmental Impact Study (EIS) Report (section 5.7.12.7) it is stated that *in traffic terms, the junctions which have existing capacity in the vicinity of the former Good Shepherd Convent site will be capable of accommodating the additional traffic associated with the proposed development, following the implementation of traffic signals at the junction of Sunday's Well Road & Thomas Davis Bridge.*

This claim is unsubstantiated on at least three grounds:

1. It fails to address traffic pinch-points and contra-flows that are currently causing severe congestion in the areas affected by the proposed development (Convent Avenue, Strawberry Hill, Sunday's Well Road and Shankiel Road)
2. The proposed implementation of traffic lights on Thomas Davis Bridge will not ameliorate any additional traffic congestion as the developers have stated that the majority of their

prospective residents will work at Apple Computers in Hollyhill. This route will therefore not apply to such residents when travelling to and from work.

3. The developers have grossly underestimated the number of vehicles that will be introduced to the area by this development. The ratio they have accounted for amounts to 210: 900 (cars: young professionals)

The EIS Report goes on to claim that *for the Sunday's Well Road – Shanakiel Road junction, it should be noted that there will be future capacity constraints even without the proposed development, and as such the proposed development itself would have only a slight impact on the operation of the junction*

We are aware that in the future there will indeed be capacity constraints in the entire area, we can see it building up now. The claim that the additional impact will be 'slight' is unprovable and contestable given our knowledge of the current traffic situation.

The EIS Report suggests that *the future delivery of the Northern Ring Road will improve traffic conditions significantly on the surrounding road network in the vicinity of the proposed development*

The Northern Ring Road was first proposed by the NRA in 2007, some ten years ago, and there has been no progress made on it to date. The impact on traffic will not be known until detailed plans of how the Northern Ring Road will be accessed are available.

The EIS Report section 5.7.12.7 claims that *the increase in cycle provision and the proposed Cork Cycle network Plan planned for the area, will support access to the proposed development by sustainable transport means.*

This statement is directly contradicted by the Cork City Cycle Plan itself which states *it would be difficult to implement cycle facilities on this route* (route CCN-U23) noting traffic pinch points, steep gradients and on-street parking as impediments to establishing cycle routes in the area. The directors of Moneda Development Limited stated at the Public Meeting of 12th January 2017 that the residents of the proposed development will *mostly cycle or walk to work at Apple*. As mentioned previously, this claim is unfounded.

Vehicle Access to the Proposed Development Site

The sole vehicle entrance to and from the proposed site is via a single gateway onto Convent Avenue, and is situated on a dangerous, blind ninety-degree bend at the top of a steep hill. Convent Avenue is too narrow to accommodate two-way traffic and is a de-facto contra-flow system at all times. On-road parking for commuters and visitors to the Cork City Gaol further restricts accessibility. The substantial increase in vehicles from the site will cause severe traffic congestion on Convent Avenue including tailbacks within the proposed development.

Effects on Local Access & Traffic

Vehicles leaving the proposed development via Convent Avenue will add to the already severe traffic congestion on Sunday's Well Road where there are immediate pinch points west-bound by

the Post Office and at the junction with Shanakiel Road, and east bound by the narrowing at Buxton Terrace, the junction with Buxton Hill, and onwards towards St. Vincent's Church. At each of these pinch points, traffic is reduced to a contra-flow system at all times.

The only alternative route to and from the proposed site is west on Convent Avenue to Strawberry Hill where there are no footpaths or street lighting on the road between the Cork City Gaol and the extremely dangerous T-junction at Strawberry Hill. It should be noted that any children from the proposed development wishing to attend the only school in the area would have no alternative but to use this already dangerous route.

Access for residents of the Lisheen residential development on the corner of Strawberry Hill and Convent Avenue will be seriously impeded by the increased traffic as their sole entrance opens directly onto the corner of this hazardous junction where visibility is extremely limited.

Strawberry Hill is entirely unsuited to traffic as it is one of the steepest hills in the city with many residential homes located directly beside this narrow road. Residents of Soho Terrace already have difficulties turning onto Strawberry Hill, a situation which will be greatly worsened by the potential increase in traffic.

The junction at the top of Strawberry Hill where it intersects with Blarney Street is already dangerous, especially for the many school children en-route to the Sundays Well National School for whom no public footpath or pedestrian crossing is provided on the south side of Blarney Street connecting the school to local housing estates and the only local shop. For motorists driving up Strawberry Hill onto Blarney Street it is almost impossible to see oncoming traffic from the right while the junction is routinely congested with parents waiting to collect children from the school.

Once on Blarney Street the hugely increased volume of traffic will be forced either to drive north up through the residential housing on Holly Hill Lane causing significant tailbacks at the T-junction with Harbour View Road, east down Blarney Street which is already badly affected by rat run traffic and multiple pinch points, or east where it will have to cross continuous, high speed in-bound traffic at the Grotto to join the Blarney Road. The bottom section of Strawberry Hill is a one-way system (down) only, a measure introduced by Cork City Council to protect residents whose homes open directly onto the road from vehicles speeding down the narrow hill. Again, no footpaths are provided on the east side of the hill making this section of the road highly dangerous for residents and pedestrians including the many tourists who take this route to the Cork City Gaol.

The junction at the bottom of Strawberry Hill where it intersects with Shanakiel Road is an exceptionally hazardous crossroad, which is subject to heavy rush hour congestion and speeding traffic at off-peak times. Visibility at the corner at the bottom of Strawberry Hill is almost entirely blind to the right resulting in frequent road traffic accidents at this location. Vehicles attempting to turn right from Strawberry Hill (toward Apple) will have to do a right turn across the blind in-bound lane and into the constant high speed west bound traffic lane on a busy crossroad junction. It should be noted that Cork City Council recognised the danger posed at this junction and installed rumble strips as a traffic calming measure but these were buried by road re-surfacing work and have not been replaced.

In all cases, the increased traffic that will be generated by the proposed development will have no alternative but to drive through old residential communities, creating excessive air and noise pollution, hindering access for existing residents and posing unacceptable hazards for existing residents and road users.

Parking

The current planning application proposes to provide 210 parking spaces for up to 900 individuals. The number of parking spaces proposed is grossly inadequate for a development of this size and is less than half the bare minimum specified by Cork City regulations (See Part G of the Cork City Development Plan 2015-2021, specifically Table 16.8) and excludes visitors, delivery or service vehicle parking requirements. It is therefore inevitable that inadequate parking provisions of this planned development will result in a massive increase of overspill vehicles seeking road side parking throughout the area.

From Part G of the Cork City Development Plan 2015-2021 Table 16.8:

Residential Development	Parking spaces allowance
1-2 Bedroom	1 plus 0.25 spaces for visitor parking
3-3+ Bedroom	2.0 plus 0.25 spaces for visitor parking

Computing from the proposed number of 1, 2, and 3 and 3+ bedroom apartments this comes to 327.5 parking spaces required.

Existing residents already encounter significant difficulties securing road side parking on Convent Avenue, Strawberry Hill & Sundays Well Road. The overspill of vehicles from the proposed development will totally overwhelm the limited local parking spaces, denying existing residents of long standing parking facilities in direct contradiction of the Local Government (Planning & Development) Act, 1963 section 26 which requires that *the car parking needs of the existing residents must take priority in any new development of the area.*

The developers are fully aware of this obvious overspill because they have identified the area outside Cork City Gaol on Convent Avenue as *wide, and can support on street parking* (Paragraph 8.3.2.1 Page 104 of the EIS). The parking overspill from the proposed development will completely overwhelm available parking for visitors to Cork City Gaol. This historic amenity continues to attract increasing visitor numbers and parking provision is inadequate for both coach and private parking even during the shorter (non-summer) visitor seasons. Tour buses and the Open Top City Tour busses which already encounter significant problems getting to the Cork City Gaol will be severely impeded, especially on the junction of Convent Avenue and Sunday's Well Road. The parking overspill from the proposed development directly threatens the viability of the single biggest tourist attraction in the city.

As this is a facility of both cultural and historic significance, parking within its walls would

seriously compromise its integrity as such, and any further demand for parking provision may be possible only in the amenity space between the Goal and the proposed development.

Alleviation of pressure on parking elsewhere in the area would therefore not be practical in that space.

Emergency Services Access

We contest that the increase in traffic and overspill of cars from the proposed development will cause severe congestion in the area, which will impede access for Emergency Services. This breaches Section 5.2.2 (Provision of Vehicle Access page 123) of the Building Regulations Technical Guidance Document B: *for effective firefighting operations, fire brigade appliances should be able to get within easy reach of a building.*

Cork City Fire Brigade & Gardai have acknowledged that they already encounter serious delays on Sunday's Well Road and surrounding areas. The additional traffic and overspill parking on local roads will seriously impede emergency services access especially for long ladder and snorkel appliances which will be critical in the event of a major incident in high-rise structures of the proposed development. Any resulting delays for emergency services responders could have tragic consequences, especially for the residents of the high rise blocks in the proposed development.

Road Safety

This development poses a significant threat to existing road users. There are large areas where there are no footpaths, street lighting or pedestrian crossings where pedestrians will be exposed to unacceptable risks arising from the increase in traffic and road side parking. In particular, school children attending Sunday's Well National School on Blarney Street will be exposed to far higher risks as traffic from the proposed development tries to force its way up onto Strawberry Hill. The developers propose to create a pedestrian route from their site out onto Buckston Hill. Buckston Hill is one of the steepest residential hills in the country and a severe test for any pedestrian. It is extremely narrow and so any pedestrians using it will be exposed to significant danger from vehicles, especially on the blind corner where it joins Sundays Well Road. The developers have suggested building a footpath on Buckston Hill for pedestrians; however the road is far too narrow to accommodate a footpath and would completely block vehicle access for existing residents.

Construction Traffic

According to the Environmental Impact Study (EIS) Report (section 5.7.12.7) *construction will be limited to certain routes and times of day, with the aim of keeping disruption to existing traffic and residents to a minimum. To minimise disruption to the local areas, construction traffic will be managed.*

The scale of the proposed development is huge and will involve an enormous number of heavy vehicles removing spoil and rubble from demolished buildings, delivering vast quantities of building materials and heavy construction machinery such as bulldozers and cranes to the site on a daily basis. To get these vehicles through the numerous pinch points on Sundays Well Road & Convent Avenue both roads will have to be closed to existing traffic and residents on a daily basis

causing immense disruption to the local residents, businesses and existing traffic. It is physically impossible to drive wide load and heavy goods vehicles through the numerous pinch points on Sundays Well Road and Convent Avenue without first removing all residential parking, especially on Convent Avenue and Sunday's Well Road. Given the scale of the proposed development this will result in local residents having nowhere to park for the duration of the proposed development.

The EIS mentions sensitivity to 'times of day' which suggests that these large industrial vehicles will be scheduled to drive through the community late at night. The noise and air pollution caused by these vehicles attempting to haul heavy loads up steep, narrow hills will cause severe disturbance to all residents and is entirely unacceptable. Car parking, in any case, will have to be restricted overnight to facilitate this movement of large industrial vehicles.

Neither the development plan nor the EIS Report makes any provision for on-site parking for the large number of construction workers that this development will require. It must therefore be assumed that construction workers' vehicles are to be parked on the public roads which will cause severe traffic congestion during the day, restricting access for residents and depriving locals of their right to park near their homes.

To minimise disruption to the local community all construction work and related transport activity must be strictly limited to standard weekday working hours. All work and related transport activities must cease between 5.30pm and 8.30am on weekdays. No construction or related transport activities should be permitted on weekends and public holidays. No construction related vehicles, including employee cars or delivery vehicles should be allowed to use public roads as holding areas while waiting to access the site as this will cause anti-social noise, air pollution and litter which will undermine the quality of life of residents and detract from the Cork City Gaol tourist attraction.

CCTV should be set up by an independent service provider to monitor construction traffic in the affected areas to ensure compliance with these terms and conditions.

Should this development be approved, a financial compensation fund must be established by the developers to compensate local residents and businesses for the loss of parking rights and to cover damage caused by passing construction traffic to vehicles and property. A bond must be provided to ensure that all damage caused by construction traffic to local roads, footpaths, public spaces and other amenities is repaired completely and promptly. Residents reserve the right to have all remedial work carried out by independent contractors.

Vehicle Access

Vehicle Access to the Proposed Development Site

There are genuine fears in the neighbourhood that a development of this size poses a risk to all residents. In the building phase, all heavy vehicles will have to use Convent Avenue to access the site. After completion, emergency vehicles will have only one entrance to the site, via Convent Avenue; access by heavy vehicles, fire tenders and ambulances must be examined before approval.

We stress that vehicle access will not only be a risk to the residents of the proposed new development; the development will also pose danger and problems for existing residents in the surrounding areas.

The sole vehicle entrance to & from the proposed site is via a single gateway onto Convent Avenue, situated on dangerous, blind ninety degree bend at the top of a steep hill.

Convent Avenue is too narrow to accommodate two-way traffic and is a de-facto contra-flow system at all times. On road parking for commuters and visitors to the Cork City Gaol further restricts accessibility. The massive increase in vehicles from the site will cause severe traffic congestion on Convent Avenue including tailbacks within the proposed development.

Effects on Local Access & Traffic

Vehicles leaving the proposed development via Convent Avenue will add to the already severe traffic congestion on Sundays Well Road where there are immediate pinch points west-bound by the Post Office & the junction with Shanakiel Road and east bound by the junction with Buxton Hill & towards St.Vincent's Church. At each of these pinch points traffic is reduced to a contra-flow system at all times.

The only alternative route to & from the proposed site is west on Convent Avenue to Strawberry Hill where there are no footpaths or street lighting on the road between the Cork City Gaol and the extremely dangerous T-junction with Strawberry Hill. It should be noted that any children from the proposed development wishing to attend the only school in the area would have no alternative but to use this already dangerous route.

Access for residents of the Lisheen residential development on the corner of Strawberry Hill & Convent Avenue will be seriously impeded by the increased traffic as their sole entrance opens directly onto the corner of this hazardous junction where visibility is extremely limited.

Strawberry Hill is entirely unsuited to traffic as it is one of the steepest hills in the city with many residential homes located directly beside this narrow road.

Residents of Soho Terrace already have difficulties turning onto Strawberry Hill, a situation which will be greatly worsened by the proposed increase in traffic.

The top 150 meters of the hill is too narrow to accommodate two-way traffic and is a de-facto contra-flow system at all times.

The junction at the top of Strawberry Hill where it intersects with Blarney Street is already

dangerous, especially for the many school children en-route to the Sundays Well National School for whom no public footpath or pedestrian crossing is provided on the south side of Blarney Street connecting the school to local housing estates and the only local shop.

For motorists driving up Strawberry Hill onto Blarney Street it is almost impossible to see oncoming traffic from the right while the junction is routinely congested with parents waiting to collect children from the school.

Once on Blarney Street the hugely increased volume of traffic will be forced either to drive north up through the residential housing on Holly Hill Lane causing significant tailbacks at the T-junction with Harbour View Road, east down Blarney Street which is already badly affected by rat run traffic and multiple pinch points or east where it will have to cross continuous, high speed in-bound traffic at the Grotto to join the Blarney Road.

The bottom section of Strawberry Hill is a one-way system down only, a measure introduced by Cork City Council to protect residents whose homes open directly onto the road from vehicles speeding down the narrow hill. Again, no footpaths are provided on the east side of the hill making this section of the road highly dangerous for residents & pedestrians including the many tourists who take this route to the Cork City Gaol.

The junction at the bottom of Strawberry Hill where it intersects with Shanakiel Road is an exceptionally hazardous crossroads which is subject to heavy rush hour congestion and speeding traffic off peak.

Visibility at the corner at the bottom of Strawberry Hill is almost entirely blind to the right resulting in frequent road traffic accidents at this location. Vehicles attempting to turn right from Strawberry Hill (toward Apple) will have to force their way across the blind in-bound lane into the constant high speed west bound traffic on a busy crossroad junction. Residents of Shanakiel will be severely impeded as they attempt to join the main road at this junction. It should be noted that Cork City Council recognised the danger posed at junction and installed Rumble Strips as a traffic calming measure but these were buried by road re-surfacing work and have not been replaced.

In all cases, the huge increase in traffic that will be generated by the proposed development will have no alternative but to drive through old residential communities, creating excessive air and noise pollution, hindering access for existing residents and posing unacceptable hazards for existing residents & road users.

Emergency Services Access

We contest that the huge increase in traffic & parking overspill of cars from the proposed development will cause severe congestion in the area, impeding Emergency Services access not only to the inhabitants of the proposed development but also to the existing community in breach Section 5.2.2 (Provision of Vehicle Access page 123) of the Building Regulations Technical Guidance Document B *for effective firefighting operations, fire brigade appliances should be able to get within easy reach of a building.*

Cork City Fire Brigade & Gardai have acknowledged that they already encounter serious delays on

Sundays Well Road and surrounding areas caused by existing traffic congestion.

This inability to access the former Good Shepherd site was a recorded factor in the Fire Brigade's delayed response to the 2003 fire on the site which resulted in extensive damage to the listed structures of the convent.

Due to the grossly inadequate parking spaces proposed by the developers, which directly contravenes the minimum number of parking spaces as set out by council regulations there will be a huge number of excess vehicles from the development parking on local roads. This parking overspill will cause even greater traffic congestion, especially on Convent Avenue, Strawberry Hill and Sundays Well Road which will impede emergency services access to the proposed site and to existing local residents.

Local traffic congestion will make it all but impossible for the Fire Brigade to bring vital equipment such as long ladder and snorkel appliances onto the proposed site. These appliances are a mandatory requirement under Section 5.2 of the Building Regulations 2006 (Technical Guidance Document B) – Fire Safety for tackling fires and other incidents in large, multi-story structures.

In particular, the junction of Sunday's Well Road and Convent Avenue which will be a vital emergency services route to the proposed development site is a narrow, heavily congested contra-flow road that is consistently blocked with traffic and parked cars.

Due to the inadequate parking provisions on site it is inevitable that there will be large numbers of residents & visitors cars, delivery and service vehicles many of which will be larger vans & HGVs illegally parked throughout the proposed development itself. This will severely limit emergency services access to the buildings on site and limit mandatory turning space required for turntable and other fire brigade appliances.

Any resulting delays for emergency services responders could have tragic consequences, especially for the residents of the high rise blocks in the proposed development.

Under Section 5.2.2 of the Building Regulations 2006 (Technical Guidance Document B) – Fire Safety P 123 Table 5.2 the minimum width of the access road must not be less than 3.7m, however when the width of legally parked vehicles on Convent Avenue is taken into account the road is frequently less than 3.2m in width. Although the precise specification of the regulations says that the width measurement is 'kerb to kerb' it is wholly unfeasible to suggest that the fire brigade would be able to remove every car on the hill in order to make the road sufficiently wide for access in an emergency response situation.

The cast iron archway over the main gate to the former Good Shepherd Convent which is covered by the site's listed architectural status has been recently removed, including the carved cap stones on each gate pillar. This architectural feature must be restored in line with conservation regulations. However, the height (head room) of the archway was, prior to its unauthorised destruction, less than the mandatory 3.7m height required under the aforementioned fire brigade access requirements. Once restored there will be insufficient head room under the gate arch for emergency services access.

Overlooking, Devaluation and Privacy

This page is concerned with the overlooking of properties, the effect on privacy and the devaluation of the properties as a result of the proposed development. There are three separate sections which none the less have much in common: the Southern, Northern and Eastern boundaries.

Southern Boundary

We wish to object in the strongest possible terms to the development along the southern boundary stretching from Convent Avenue to Buckston Hill incorporating residences in Homeville, Lee View, Sundays Well Road, Buxton Terrace and Holly Mount.

The structures are B 2, B3, B4 and B 5. These blocks of buildings are set just 10 metres from the southern boundary wall running the whole length of the development overlooking the homes of residents along this perimeter. This overlooking aspect is further exacerbated by the fact that ground level in the Good Shepherd Convent (GSC) is approximately 15 feet above the ground level of the homes along the southern boundary.

The blocks are south-north in aspect which means they are directly impinging on the privacy of the homes and amenity areas along the southern boundary.

These blocks will also deny residents of their long held views of the now iconic red brick buildings of the Good Shepherd Convent and its gardens, something the developers have not considered as being of relevance.

These blocks will be visible from the minute you reach the top of the airport hill driving into the city and many areas throughout the city. In spite of cleverly selected locations for photographs of the finished development the developer has failed to recognise that deciduous trees are in leaf for less than 6 months in any one year.

Also some photographs utilise cover provided by trees which are NOT within the boundary of GSC and there is no guarantee this seasonal screening will remain for all time.

For a sizeable duration every year these blocks will be highly visible as white/grey flat roofed blocks in an area that is 100% pitched roofed and the main buildings are very large iconic red brick in construction.

This will be the **permanent legacy** of this development to the City of Cork.

These buildings are flat roofed in total contrast to the pitched roofs in the whole Sunday's Well area.

Apartments of a pitched roof nature such be constructed for blocks A1 to B5 throughout the whole development.

A first floor bedroom along the southern boundary will be at the same height as the ground floor of apartments in B2 and B5.

This will impinge hugely on the privacy within these homes and their amenity spaces to the rear of their homes. As traffic along Sundays Well Road is a constant flow from early morning to very late at night the only areas of quietness and relaxation are to the rear of these homes into which residents

in blocks B4 and B5 will have un-interrupted views as these blocks are south facing. It is proposed to provide tree screening of 9 lime trees along part of the southern aspect of B4. None where B5 overlooks the homes in Lee View Terrace and Holly Mount.

These trees are slender small leafed slow growing trees and will provide negligible screening and as they are *deciduous* will in any case only provide screening for less than 6 months in any year.

The southern boundary wall is in excess of 150 years old, limestone in some places and red brick in others. In places this boundary is letting water through to the gardens, back yards of houses along this boundary. Please see the objections based on the geological survey section in this document.

Any disturbance along this boundary could result in damage to the aquifers in GSC causing further ingress of fresh water damaging ground floors, kitchens etc as outlined in Geology section in this document.

The possibility of damage to the aquifers and/or the boundary wall further strengthens the necessity for a **substantial bond** be taken out by the developer so that any damage can be repaired and walls etc, reinstated to their original pre-damage condition.

Residents in B2 and B4 will have uninterrupted views of backyards, gardens and upper storey bedrooms of the houses along the southern border from ground floor level of GSC.

Privacy will be seriously compromised by this development. This privacy has been enjoyed by residents and their families for 50 years in some cases and certainly not less than 30 years in most cases.

This loss of privacy will have a huge effect on the value of properties along its southern boundary as it will for residents on Buckston Hill and Blarney Street.

For the above reasons we wish to object to the blocks B2 ,B3, B4 and B5.

In the pre-planning meeting of 19/10/2016 it is noted that *the applicant should look at townhouse/duplex type units in the lower part of the site, in keeping with the grain of existing housing to the south.*

A proposal which would have two storey semi-detached pitch roofed houses distributed around the south and eastern boundaries and set well back from these boundaries to avoid overlooking the amenity areas being affected would be much more palatable. Blank gable ends, containing no windows, set well back from this southern boundary would decrease the overlooking aspect enormously.

These properties should not have any balconies as this would introduce overlooking aspects within this suburban parkland.

The orientation of the blocks overlooking the southern boundary should be rotated 90 degrees so having e.g. front doors facing west and back gardens facing east, or vice-versa would further decrease the overlooking aspect and minimise the loss of privacy impact.

At the moment we are faced with 65 metre blocks of 3 storeys within 10 metres of properties and

gardens situated at a significantly lower level due to the falling gradient as one goes in a southerly direction down to Sunday's Well Road.

We would strongly request that before any decision is made regarding the above the City Planners should visit and see for themselves how acute and intrusive this aspect of overlooking actually is for the southern and eastern boundaries.

Perhaps a walk up Buckston Hill would further inform the planners regarding the pedestrian entrance at Buckston Hill.

Northern Boundary

The proposed development, by reason of its design, bulk, height and layout, takes insufficient cognisance of the location of the site at the interface between larger scale development and the existing smaller scale residential property and would not create a proper transition in this historic part of the city. The proposed development would be visually obtrusive and overbearing and would, therefore, seriously injure the amenities of properties on the Northern boundary side and indeed other properties in the vicinity and would be contrary to the proper planning and sustainable development of the area.

It is the objective of the City Development Plan to enhance and develop the urban fabric of the city and its environs and that development should minimise the impact of traffic. These are reasonable objectives. The proposed development, by reason of the lack of appropriate street frontage, the mass of the proposed residential blocks, the extent of surface car parking and the segregation of uses within the site, would result in a disorderly form of development on this important site in the city, would set a precedent for similar over development in this centrally located area, and would fail to comply with the policies and objectives of national guidelines and the current City Development Plan.

Eastern Boundary (Buxton / Buckston Hill/ Upper Janemount)

The eastern boundary of the site will be overlooked, particularly at the top part of Buxton Hill at the 90 degree turn to Upper Janemount. This is due to the positioning of 4 to 5 storey apartment blocks (A5 and B1) on the boundary. These buildings due to their height and scale will intrude on the houses on the boundary and eliminate the privacy that now exists in the area. The current plans available to residents show that windows from the buildings will overlook the houses on the boundary, allowing residents of the blocks clear visual access to the gardens and indeed into the interior of the houses on the boundary.

It is equally clear they will reduce the natural light to houses on the boundary.

They will eliminate the views currently enjoyed by residents on the eastern boundary of the site.

While in one section of their plan, the developers claim no view will be directly impacted on by their development, their Architect's Design Statement notes in contradiction that the view from Buxton Hill will indeed be directly affected by the development.

We would ask that the amenities currently enjoyed by the residents on the eastern boundary, in

terms of privacy, access to natural light, and views be respected in any development plan by scaling back the size of the blocks in question to a scale that conforms with the City Development Plan 2015-2021.

Geological Survey

Two houses, one in Hollymount, Buxton Hill, the other along Sunday's Well Road, which lie at levels much lower than site level at southern boundary wall of the Good Shepherd Convent (GSC), have recently been very badly damaged with water flooding which emanates from the GSC area through the bedrock aquifers. This damage has run each house into large 6 figure sums to repair. Historically, houses in this area have been plagued with damp.

The increased run-off caused by such a large scale development and the disruption of natural springs may significantly increase the flow of stormwater through these aquifers resulting in flooding and undermining of the foundations of the properties to the south of the development (Buxton Terrace, Sunday's Well Road etc.).

The difference in height referred to above is at least 15 feet and up to 20 feet in some places.

The four houses in Lee View which lie at lower levels to (GSC) have the boundary wall weeping and oftentimes gushing with fresh water from at least 2 metres, bedrock, under the ground level of (GSC) site above them.

This emission of water is taking place without any site disturbance and one can only imagine what will occur when cutting/drilling etc takes place in (GSC).

The entire section dealing with the geology of the site is a cut and paste from the Environmental Impact Study (EIS) done by ARUP for Franilla in 2005. Moneda did not carry out any up to date geological survey for the EIS for this development.

On page 249 of the EIS done by ARUP in **2005** for Franilla in Section 14.3.1.2 it states that *the report did not describe the bedrock geology in any detail.*

It is interesting to note that the Ground Investigation (GI) took place in August and September 2005 when ground conditions would be expected to be at their driest.

Section 14.3.4.1 on page 250 in EIS information from the Geological Survey of Ireland (GSI) Groundwater Protection scheme *indicates that the site of the proposed development is located in an area which has an aquifer classification of "L1" indicating that the site is underlain by a "locally important" bedrock aquifer, which is moderately productive.*

The Groundwater Protection Zone within which the sites falls, is classed as "E" indicating that the aquifer is of *extreme vulnerability.*

This raises the question *why was no bedrock geological investigation undertaken?*

Given the above facts the developers must undertake to complete a Geological Survey of the whole site to ascertain if the site can withstand anticipated building disturbance.

This highlights the need for the developer to raise a bond to cover any damage likely to occur given the damage likely and geological assessment quoted above.

It is also noted that the water supply will come from Blarney Street mains.

All foul water generated on site will be connected to the existing combined sewer on Convent Avenue.

Both these systems are overloaded already.

In conclusion, there are fears that a development of this scale should not proceed without investigating the geology, to determine the stability of the substructures and aquifers. A geological survey should be carried out before approval. The capacity of the sewerage and drainage systems will need to be assessed following the document *Planning System and Flood Risk Management Guidelines for Planning Authorities*, 2009.

Financial Bonds

Three kinds of financial assurances are required of the developers:

1. Approval should not be granted without insisting that the developers provide an adequate Completion Bond, to ensure that the project will be completed as approved.
2. A bond must be provided to ensure that all damage caused by construction traffic to local roads, footpaths, public spaces and other amenities is repaired completely and promptly.
3. In addition, the developers should be required to prove that they will be adequately insured to compensate adjoining residents in the event of damage to residents' properties, etc. subsequent to completion.

Requirement for a Completion Bond

It appears that Moneda Development lacks experience in or a track record in delivering projects on this scale. We are mindful locally of the failure to fully develop Our Ladys Hospital on the Lee Road, and nationally of the example of Priory Hall and the legacy of ghost estates. We would therefore respectfully request that as a condition of planning that the Council impose the following condition, that Moneda Developments be required to purchase a completion bond to cover the cost of construction should they go bankrupt or due to any other circumstance be rendered incapable of completing the project, the bond to remain in place for the period of construction. This would also protect the Council from any adverse financial outcome due to non-completion.

Construction Insurance

We would respectfully request that as a condition of planning that the Council impose the following condition that Moneda Developments be required to purchase an insurance policy to cover the cost of any damage caused to properties on the boundary of the development during the course of construction. The insurance policy should remain in place for the period of construction and for a period of three years post completion. We also ask that as a condition of planning that any damage to surrounding properties (including subsidence, damage to walls, water inundation, fire) be repaired immediately. We would respectfully suggest that the overall coverage should be calculated at a sum €500,000 for each surrounding property.

The insurance should also cover compensation to victims for injury or loss of life due to the activities of the developers as this is a heavily populated area, many families are with young people and children.

Post-construction Insurance

In the event of damage occurring to local properties (walls, flooding, subsidence) residents demand that there be a compensation fund set up as an escrow so that there is always a recourse to compensation even after Moneda Developments Limited have ceased trading.

History

Historical Context.

The Good Shepherd Convent, Laundry Home and Orphanage were constructed on a phased basis between 1870 and 1875. (Chapel started 1879 to 1881) The buildings are protected structures on the Cork City Development Plan. They are also included in the National Inventory of Architectural Heritage's Survey for Cork City.

The site is also located within the proposed Sunday's Well Conservation Area in the category of institutional lands. Vehicular access to the site was provided via Convent Avenue with mainly pedestrian access onto Buckston Hill, although this second access point was also used for agricultural vehicles going to the farm in the East Field on Buckston Hill. There are two known cemeteries on the site. The first to the north east is where Little Nellie of Holy God (as she was known) lies buried, along with members of the Good Shepherd Order. Another older graveyard believed to also contain the remains of some of the nuns is on the north western corner. A third unmarked graveyard, which we have been told contains the remains of residents or Magdalene's, lies outside the north western corner of the site. We understand these grounds are adjacent to the property currently leased by the City Gaol. More recent remains of residents were buried at St. Joseph's Cemetery on the South side of the city.

Whilst the orphanage was closed in the late 1970's the remaining buildings were occupied by the sisters and elderly residents until 1992.

We are sensitive to the history of the site and particularly to the difficult memories of the Magdalene women and others who may have lived in the Good Shepherd Convent. We support the work being done by the Justice for Magdalene group who are available to assist those who continue to be affected by their time spent there. Justice for Magdalenes may be contacted at: magdalenelaundries.com.

The particular history of this site, and the sensitivities of former residents and their families, must be respected. In light of recent discoveries of unmarked and mass graves at institutions run by religious, a full archeological survey of the site should be mandatory, with the identification of burial sites a priority.

Historical Sensitivity

The conversation around Magdalene Laundries is an ongoing one that has not yet reached a conclusion in many different sectors of Irish life. It is a complex subject that involves a range of stakeholders. The conversation incorporates the voices of those who were residence in these institutions, their children and families, the Catholic Church, the Irish State and the citizens of the country of Ireland. Magdalene Laundries represent far more than just physical buildings in 2017. They housed people, their lives and hardships, and their existence resulted in not just individual traumas, but in a collective trauma for the conscience of Ireland.

Any building on the Good Shepherd Site is an opportunity to positively and restoratively respond to something that physically and psychologically represented something negative and destructive. Any

new structure on this site must respond in a sensitive and reconciliatory manner. It must not re-victimise victims or continue to exclude the voices of others. That would only be to repeat what has already been done on this site.

As recently as this month (March 7th, 2017), a motion was secured by Dublin Councillor Gary Gannon, to halt the sale of the Sean Mc Dermott Street facility in Dublin on the grounds that it failed to consider the terms of the Quirk Commission and the Magdalene Laundry Restorative Justice scheme.

The residents of Sunday's Well, Blarney Street and its environs, as well as the wider Cork community do not have the option to prevent the sale by the Council to a private developer. What we do have in our power is to advocate that a future development would be exemplary in its sensitivity and consideration of the history of this site. It represents an opportunity to lead the way in restorative justice practices and to be in dialogue with, not in ignorance of the past. It also represents a prospective commercial, tourist opportunity, to invite visitors to Cork to engage with another part of Irish history that must be acknowledged, not repressed.

There is little merit in developing reparation schemes that financially compensate victims and to do little else in other areas of public life. The State had to assume responsibility for the majority of the compensation related to the victims of the laundries. Any development on the former Good Shepherd Convent site represents an opportunity for both the individual and the community to proactively engage with its history, and is a chance to bring people together, rather than perpetuating an issue that has been talked about in a sheltered and oblique manner.

There are many interpretative and memorial centres in Germany, France and the USA that invite and provoke discussion about these respective countries' histories. They not only attract visitors to cities like Washington, Berlin and Paris in their droves, they also allow for an international dialogue around darker moments in human history. Moreover they represent an opportunity to recover, to repair harm and to take responsibility. That conversation needs to be a collaborative, restorative and inclusive discussion. It is clear that this proposed commercial development will extinguish all possibility of such a conversation taking place. It is worth noting that this opportunity exists just once, and if the proposed development goes ahead, there will never again be an opportunity to consider how we might respond to the history of this site as it will be built and remodelled irrevocably. We can continue to fail in our duties as citizens, or we can 'fail better' or even succeed in our attempts to consciously and actively participate in our past, present and perhaps most urgent of all, our future.

Possibility of unmarked graves

A full forensic geo-physical examination of the entire site, including the graves of the nuns graveyard and Little Nellie's grave, should be undertaken before any construction work commences, by a reputable Forensic Archaeological Company employing the services of experts such as Osteo-Archaeologists.

Several techniques are available. Ground penetrating radar (GPR), terrain conductivity (TC), thermal infrared imagery (IR), as well as magnetometers and metal detectors.

All these methods are non-invasive and non-destructive.

The only way to determine if unmarked graves are indeed present at any part of the site is to undertake a systematic whole site survey and not a series of test trenchings alluded to on p 213 of the EIS which may or not detect unmarked graves.

The geo-physical survey will yield scientific evidence for the presence/absence of unmarked graves for the whole site and would rule out any element of luck in choice of ground for test trenching.

The survey will inform the archaeologists with regard to informed choice of locations for test trenching and is the most logical scientific methodology to be followed.

Without prejudice the results and findings of this forensic examination should be given to

- Claire McGettrick, PRO Justice for Magdalenes' Research
- Maureen Considine, Director of the NFP The Survivors' Community Garden Project, Ltd.
- Tom Coleman, The Chairman of the Blarney Street Community Group
- The developers Moneda Developments Limited
- An Gardaí.

Depending on the results expertly supervised archaeological digs may be necessary to confirm the presence/absence of human remains.

An Gardaí, the State Pathologist etc may then be summoned to examine any human remains, ascertain cause of death if possible, and decide if the graves or burial grounds be treated as crime scenes requiring further examination.

We object to the development commencing until the Geophysical survey outlined is completed and professionally assessed.

Architecture

The Good Shepherd site sits within the suburb of Sunday's Well which is designated as an Architectural Conservation Area. As well as the protected structures within the site, many of the surrounding houses date back to the 19th Century and beyond. The proposal to site 3-5 storey units in the grounds of a listed, Victorian convent is both inappropriate to the heritage of the area and detrimental to the architectural integrity of the listed buildings. It is our opinion that the proposed buildings are neither sensitive to nor complimentary to the convent buildings. The 5 storey blocks dwarf the buildings that are to be retained and refurbished, and the design of the blocks makes no attempt to augment, showcase, or even blend in with the listed buildings. To parachute these blocks of concrete into an area recognised and admired for its old world character does not in any way constitute appropriate development.

Should this development go ahead the predominant views from outside the site and particularly from the North and Eastern boundaries will be of towering modern structures intimidating the existing protected Ashlin buildings. Previous planning refusals have required that developments on the site must enhance the existing buildings on the Good Shepherd complex. The refusal for the amended plan 07/32544 on December 2007 said that the block-form, height, scale and massing represented a form of development which is contextually inappropriate and which does not respect the existing Protected Structures on the site. This current proposal is of similar form, height and scale.

The planning application is in contravention Chapter 9 of the Cork City Development Plan 2015-2021, specifically Objective 9.32 states that:

Development in Architectural Conservation Areas (ACA's) should take account of the following:

- Acceptable design, scale, materials and finishes for new developments;
- Original materials and methods of construction should be retained. For example,
- original roofing material types should be retained along with original forms and locations of openings etc; ...

The design proposed for the refurbished Home and Orphanage buildings, which are listed for preservation, incorporates dormer roof windows. This change of roof form and introduction of new openings does not follow these guidelines.

The planning application is in contravention of Article 16.46 of the Cork City Development Plan 2015-2021 (CCDP). The design of the new apartment blocks as flat-roof cubes, and the proposal to face the new apartment blocks with light grey materials, is inappropriate for this location. The apartment blocks should be of restricted height, with pitched and slated roofs, and should be faced in traditional red brick.

Are the new buildings as proposed appropriate in an ACA?

	Proposed	Suggested
Design:	modern, cubic shape with flat roof	pitched, slate roof
Scale:	up to 5 storeys	no more than 4 storeys below the Ashlin buildings
Materials and finishes:	light grey brick	red brick

The preponderance of 1 and 2 bedroom apartments does not conform to the CCDP and is not sympathetic to the residential aspect of the neighbourhood, which is predominantly family housing. This density of smaller units could become a new, separate neighbourhood of more temporary residents with little or no connection or commitment to the existing neighbourhood, especially if a significant number of units are purchased as "buy to let" by prospective landlords.

Community Considerations

We ask to ensure that the development of Sunday's Well is planned sympathetically involving the local community. We consider Community Planning a vital tool and a key aspect in keeping this closely knit community healthy and safe.

Community Planning

The local community was not invited to become involved in any consultation or community planning prior to the development of this plan but instead the community was presented with an advanced plan in January 12th 2017 under the guise of 'Community Consultation'. This is not in keeping with the public consultation strategy Cork City Council prides itself with during the development of the Cork City Development Plan 2015-2021. The lack of consultation shows disrespect for the local residents' skills and ability to develop a plan in conjunction with professionals and developers. The local community hold the history and knowledge of the area and any future development of the Good Shepherd Convent should be informed by the local residents in conjunction with other relevant professionals. Attendance at recent public meetings has demonstrated the interest and willingness of the local community to participate in a Community Planning Process.

Social Housing

The proposal is to provide all social housing units in a single block, building A1. This avoids any attempt at integration and promotes social exclusion and ghettoisation. The requisite social housing units should be distributed throughout the development, in each of the proposed buildings. Individuals and families in need of social housing must not - *especially on this Good Shepherd Convent site with all its heart-breaking social history* - be treated as second class citizens.

Artistic and Civic Concerns

There are many artists, musicians and writers living in the neighbourhood. Sunday's Well and its environs have a beautiful village atmosphere that is ripe for appropriate development. One such development is to consider how the space could be used by the arts to complement the area. This proposed development does not adequately reflect on how this space may be used to enhance the civic and artistic community in this area.

Ageing Population

Another proposal for the site would be to consider purpose built units for the ageing population of the area. This development has not considered the volume of older people who have lived in the area all their lives and whose families go back generations living in Sunday's Well and the surrounds.

Environment

Wildlife

The application rests largely on a survey by Dixon Brosnan which took place between 2005 and 2007, in other words a survey that is a decade out of date. But it is our contention that in any case the wildlife surveys conducted are flawed and have little value in terms of supporting the planning application.

In terms of bats it notes correctly they are protected by the Wildlife Act of 1976. All Irish bats are protected under the 1976 Wildlife Act and also by The European Habitats Directive. It is an offence to intentionally kill or disturb bats without a licence. Under The Habitats Directive, both the roosting sites of bats and their hunting habitats are protected. The developers attempted a survey in September 2016 but they note in their own report, *due to either persistent interference or equipment malfunction only limited data was retrievable from one of the passive detectors*. [One of two detectors] (p. 185) This is hardly satisfactory in terms of identifying if protected species are in the complex. It further notes that the presence of Barn Owls a red-listed species have been identified as being present on the site. The application notes that *it is not possible to ascertain if this species is breeding or roosting within the buildings on site*. (p. 198) An amateur survey on the nights of the 16th and 17th March 2017 suggests that there may be Leisler's bats and Pipistrelles on the site. Again we would suggest a proper survey of the site should be able to establish this, and it is not good enough to suggest as the developer does that nesting sites can be identified during construction.

All wild birds are considered protected species under the Wildlife Acts 1976-2012. It is considered a crime under these Acts to wilfully interfere with or destroy the breeding or resting place of wild birds. Whilst there is reference in this application to providing nesting boxes for swifts, there are other species on the site; bats and a barn owl have also been seen. There is no provision for the protection of their habitat, as required by law.

There are also foxes living and breeding on the site. These were certainly noted by residents as far back as the 1990s.

All this surely is a negation of the responsibility on the part of the proposers to provide the Council with a base of full and complete information on which to make a planning decision. We would respectfully request that the developer be ordered prior to the granting of any planning permission to conduct a comprehensive wildlife survey by a credible independent professional authority which addresses the lack of information in the current application.

Fire hazards

Fire Spread

During the 2003 fire on the former Good Shepherd site, burning ash, embers and other debris from the blaze spread over the northern boundary wall igniting secondary fires in several neighbouring residences on Blarney Street. Garden sheds, outbuildings & wheelie bins were set on fire and significant damage was caused to private property.

At the time, Cork City Fire Brigade personnel told affected residents that had the prevailing winds which usually blow up from the Lee Valley been stronger on the night these secondary fires would have spread over a far wider area, threatening several homes and business premises. The fire also caused a significant smoke plume which caused serious pollution across a wide area to the north of the proposed site.

The proposed development includes several multi story residential blocks located right beside the northern boundary wall. Any fires which may start in these blocks or in the waste storage, ventilation flues and other facilities located at the rear of these blocks will almost certainly spread to adjacent residences causing a serious threat the lives and property of existing residents.

This threat will be increased by the funnelling effect of the prevailing southerly wind passing between the multi-story blocks where it will hit the northern boundary wall, lifting burning material and fumes over the wall and creating a downward vortex which will draw this hazardous material down into adjacent properties.

Likewise, any gas leaks that may occur on the proposed development site have the potential to spread into neighbouring properties posing a significant threat to public safety.

Fire Water Mains (Supply)

During the major fire which destroyed much of the former Good Shepherd Convent in 2003 the fire brigade found that there was no suitable fire-fighting water supply on site and water pressure on Covent Avenue was insufficient for their needs.

Hoses had to be run from Blarney Street, through private homes and over the northern boundary wall of the site in order to fight the extensive blaze.

The time taken to locate a suitable source of fire-fighting water and to run hoses to the site delayed the fire brigade response, contributing to the near total destruction of the site.

Should a fire break out in any of the proposed multi-story flat blocks any such failure to provide sufficient fire-fighting water could have tragic consequences for the residents.

The developers must provide a new source of fire-fighting water on the proposed site which does not reduce the water supply and pressure for the existing community.

Fire Water Run-Off

In the event of a major fire on the proposed development site there will be large volumes of contaminated fire water run-off resulting from fire-fighting activities.

No provision has been made by the developers to contain fire water run-off so, as per the current plan this contaminated water will flow down through the site, contaminating the ground and the shallow sandstone rock that runs under the area and into the aquafer to emerge into neighbouring properties on Sundays Well Road & Convent Avenue and down into the River Lee.

At present, natural rain water from the site pours out through the main gate onto Convent Avenue where the drains are entirely inadequate to handle the flow rate. This results in large volumes of water pouring down the public road and pavements. In the event of a major fire

this water will be highly contaminated fire water run-off which poses a serious environmental and public health hazard. The developers must provide a comprehensive site drainage system and fire water containment bund or reservoir to prevent polluted water from the site affecting local ground water and polluting the local environment.

Pollution

Air Pollution

An increase in traffic will generate higher levels of emissions, including highly toxic Nitrogen Dioxide and harmful particles, especially from diesel delivery vans and HGVs. The steep gradients and frequent pinch points on the roads throughout the locality will result in constant traffic jams requiring frequent hill starts all of which will contribute to higher levels of pollution. This poses a significant risk to public health and wellbeing, especially for asthma sufferers, children and expectant mothers.

According to the World Health Organisation *“Air pollution from both outdoor & indoor sources represents the single largest environmental risk to human health globally. WHO estimates that air pollution exposure was linked to more than 6 million premature deaths in 2012”* (World Health Organisation 17.02.2017)

One of the most dangerous sources of pollution comes from diesel burning vehicles, which represent the vast majority of vehicles on Irish roads. We assert that the major increase of traffic resulting from proposed development contravenes both the spirit and objectives of E.U CAFÉ Directive 2008 and Ambient Air regulations 2009 which aim to reduce air pollution and the risks it poses to human health.

We demand that a comprehensive air quality monitoring programme be conducted in the area by an independent & credible agency to determine the current levels of air pollution caused by traffic and to predict the increased levels of air pollution arising from the proposed development and its impact on the health of local residents.

Noise Pollution

The increased traffic will severely effect the peace and quiet of the community, harming public health, quality of life for existing residents and undermining property values. It should be noted that, according to the developers, many of the proposed new residents will be employees of Apple on Hollyhill. As this facility operates 24 hours shifts there will be constant traffic through the community which will disturb the sleep of existing residents.

We contend that this planning application will result in breaches of Statutory Instrument, S.I. 1401 of 2006, Environmental Noise Regulation 2006. *“to avoid, prevent or reduce, on a prioritised basis, the harmful effects of exposure to environmental noise through the preparation of strategic noise maps and the development and implementation of action plans”*.

We demand that a comprehensive noise monitoring programme be conducted in the area by an independent agency to determine the current levels of noise pollution in the area and to assess the negative impact the proposed development will cause.

Alternative Uses

Any proposed development on this site is an opportunity to consider how best to respectfully respond to the previous inhabitants of this space. An expectation would be that this is undertaken in a sensitive and restorative manner. Whilst the community is positive about the site being developed, any proposals should enrich and respect the history of this site, and not detract from it. The developers have not given this due consideration.

The character of the area and that of the proposed development

While it is possibly desirable to combine some variation in the densities and socio-economic mix in an area, proper planning and development requires due consideration of the scale and impact of any new development upon existing private properties and infrastructure.

The proposed development, due to its scale and architectural character, would have a negative impact upon the amenity, traffic and existing character of the area and would therefore be contrary to the proper planning and development of the area. The development proposal

The site layout, architectural character, density and mix proposed, if reviewed, could provide a positive contribution to the area subject to the site layout, number, type and architectural quality of residences being modified to provide an extension to development already existing. This would result in significant reductions in the negative impact which the existing proposal would have upon individual properties, and the area as a whole, and would be in accordance with the proper planning and development of the area.

A proposal which would have two storey semi-detached pitch roofed houses distributed around the south and eastern boundaries and set well back from these boundaries to avoid overlooking the amenity areas being affected would be much more palatable. Blank gable ends, containing no windows, set well back from this southern boundary would decrease the overlooking aspect enormously.

Retirement Village

The Good Shepherd site would be an ideal location for a retirement or elder care village similar to the existing accommodation at Mount Desert, Lee Road or Haven Bay in Kinsale. This might comprise of a nursing home within the footprint of the existing Protected Structures and a number of independent living units on the surrounding grounds. Those providing advocacy for the elderly favour a move away from nursing home beds as being the only option for those who can no longer live in their own homes for a variety of reasons. Many inappropriately live out their later years in nursing homes when their requirements could easily be provided for in lower dependency units.

By providing a village – type setting with shops, cafes, hairdressing and other services, the elderly in our community could live in a secure environment, yet maintain an independent lifestyle until their medical needs require higher dependency residential care in the nursing home. This would prolong positive mental health and physical mobility, which is the aim of elder care advocates throughout the developed world in the 21st Century.

Cultural Centre

There are also opportunities for exhibition spaces, artistic work spaces, and spaces for musical and theatrical performances. The provision of crafts and arts experience for schoolchildren is hampered in Cork city by a lack of insurable public spaces and yet there is a steady and persistent demand for such facilities.

The above are just some suggestions as to how the site may be developed in conjunction with a low-density residential plan. The impact on the community would be considerably less than that of the current proposal for the site. There would be no rush hour traffic and visiting nursing homes and participating in cultural activities generally occurs off peak in the afternoons and early evenings.