

Tom J Coleman
189, Blarney Street
Cork

Planning Department
Cork City Council
City Hall
Anglesea Street
Cork.

22nd November, 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 in the light of the further information presented to Cork County Council by Moneda Developments Ltd. (henceforth, "the applicant"), on 18th October, 2017.

I and the members of the elected committee of this group, representing the local residents of the areas surrounding the proposed development objected in our submission of 19th March, 2017 to the granting of planning permission to the applicant for the development of the former Good Shepherd Convent and environs in the Sunday's Well area. Our original objections still stand as the further information presented by the applicant on the 18th October 2017 did not materially alter the majority of our grounds for objections, as many sections in our additional objection below indicate.

The large attendance at public meetings and the large number of objections raised to the original proposal highlight the concern that residents have over the proposed development. At each public meeting there was a unanimous rejection of the proposal as it stands, and more recently, as it has been amended in the light of the further information request.

On a matter of procedure, we regret to point out that Cork City Council may have infringed our citizen's rights. The further information submitted by the applicant on the 18th October was received by Cork City Council on the 19th. Objectors were not informed by letter from the Cork City Council until after one week had passed (correspondence from Cork City Council dated 24th, posted 25th, received 26th.) It was then a further week before the new Environmental Impact Assessment Report Issue 2 (EIAR 2) documentation was available for public inspection online. The five-week period for responses had been reduced to three.

In general we remain alarmed by the careless reporting of facts in the original application and the EIAR and are further alarmed by the inaccuracies in the new information and in the EIAR 2 provided by the applicant.

Our objections stem from the sheer density of the population increase this proposal would bring to the area with all its attendant problems. The substantive issues which flow from this are treated in the ten sections of our original submission of the 19th March and many points are amplified in the following twelve sections of the current objection because they were not fully addressed in the further information provided by the applicant. Both our original submission of the 19th March and the twelve sections of the current submission below form integral parts of our joint objection.

We ask you to consider our objection 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

A handwritten signature in cursive script that reads "Tom J. Coleman".

Tom J. Coleman

mob: 087 292 1522

email: tomj.coleman@gmail.com

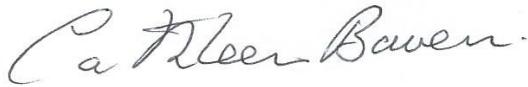
Co-signatories and members of the committee



Andrew Sullivan



Barry Sheehan



Cathleen Bowen



Don Spicer



Geoffry Steiner-Scott



Jurek Kirakowski



Martin Krasa



Pat Carroll



Phil Allen



Ray Coughlan

1. Density

The applicants' response to the RFI is unsatisfactory and does not conform to targets set in the Cork City Development Plan 2015-2021, Volume 1, Chapter 16.

The population density (bed spaces) of the revised proposed development in response to the RFI No 1 has in effect remained unchanged, a minuscule 8 (eight) (459 original, 451 revised) despite the reduction in the number of units now proposed (234 original, 202 revised). In the summary of their response to the RFI document the applicants conveniently only highlight the reduction in building density but neglect to state the almost identical number of bed spaces as they propose in the original application. The number of potential new inhabitants of the proposed development thus remains almost static at up to 900 or more.

The number of residences proposed by the applicants 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 902 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
41 x 1 bed apartments	(20%)	Max 20%
94 x 2 bed apartments	(46%)	Min 30%
47 x 3/3+ apartments and 20 x 4 bed houses	(31%)	Min 50%

The preponderance of 2 bedroom apartments does not conform to the Cork City Development Plan 2015-2021 and the number of 1 and 2 bedroom apartments (66%) is not sympathetic to the residential aspect of the neighbourhood, which is predominantly family housing. The 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 notation "3/3+" is worrying as it could be interpreted to mean blocks of units with 3 to 6 bedrooms adjoining a common living area, of the type rented to students and transient workers.

However, it should be noted that the indicative target for “3/3+” apartments and houses is a minimum of 50% whereas in the proposal we have only 31%.

The total number of apartments should be reduced, the balance of 1, 2 and 3+ apartments and 4 bed houses should conform to the Council’s indicative targets, and the intent behind the nomenclature “3/3+” should be clarified.

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

2. Traffic

We object on the strongest possible grounds to the inaccurate, tendentious, and misleading information provided by the applicants regarding traffic to and from the proposed development. This section will deal with traffic issues in the broad sense, section 3 will deal with the problems posed by the construction traffic.

Unfortunately, local transport in Cork is not well developed, partly due to the poor state of many arterial roads. The effect of this on business in Cork city has been recently highlighted by John Higgins, managing partner at Ernst and Young's Cork office (Evening Echo 10.11.2017) and in a detailed article by Rob McNamara (Evening Echo, 21.11.2017) which cites authorities such as Conor Faughnan (AA), TomTom, and a TII report. Conor Faughnan is quoted as saying "traffic volumes will inhibit economic growth and act as a choke and restrictor on it".

If we want to make Cork a vibrant commercial centre, we ought to improve access to the city centre from the dormitory suburbs, not stifle it, yet this is the inevitable outcome of the applicant's proposals.

The lack of public transport and the steep gradients in the local area (see below) suggest that the vast majority of the 900+ residents of the proposed development will require private vehicles for their transport needs. Apple has 4,700 parking spaces for their employees and a source close to Apple has admitted that 'everybody' drives to work, even those employees within ten walking minutes. UCC has three large car parks for the use of non-staff which are often completely full. Students regularly drive cars to the College.

The proposals put forward by the applicants for cycling, pedestrian and public transport are without foundation in facts and do not conform to the spirit of the aspirational goals of the draft National Transport Framework document.

Public transport is dealt with in section 7 of this objection.

The descriptions in sections 8.3.2.1 - 8.3.2.5 of the proposal are not accurate in many instances and fail to mention the substantial narrow sections of these roads which present numerous "pinch points" at which traffic can only move in one direction (see below). These are entirely neglected from the descriptions and appendix P does not show these "pinch points".

Therefore, normal statistical models such as used by PICARDY and LinSig will give distorted readings when applied to these particular roads and single-figure counts based on one day (with no variance estimate), namely 16 October 2016 (see 8.4.3), must be interpreted in the light of local knowledge. Local knowledge and the state of the roads (see below) suggests that these are accidentally low readings, perhaps potential *outliers*, in statistical jargon.

PICARDY and LinSig were used to give a "conservative assessment" (p.111). "Conservative" is a technical word which in statistical terms means "toward the lower bound". The 85% confidence interval will extend substantially toward the *lower* end of the distribution just as much as it will extend to the *upper* end (the smaller the percentage of a confidence interval, the wider the bound). But the models were instructed to produce the "conservative" *lower* bounds of this wide 85% confidence interval.

Conclusions on the basis of these database models are therefore doubly suspect because (1) the raw data as supplied to the model was not adequately sampled, and then (2) the models were instructed to produce a conservative lower bound of a wide confidence interval.

The traffic survey is poor. On pp. 104 and 105 we see: "The assessment of impacts on the road network, including the projected change in prevailing travel conditions, has been based on the rating system in ... [our ellipsis]" and that is all that is presented. The rest of the pages after the ellipsis is blank. The impact assessment criteria of table 8.1 are never applied. This may well be because the traffic flow changes of the proposal will indeed result in "Profound" effects: "A major change in travel conditions resulting in the breakdown in traffic flow and significant delays to traffic" but this is never stated.

Other sections of this objection will deal with public transport (section 7) and access to essential amenities (section 4). The current section deals with

1. The effects of increased traffic on the local community
2. Inadequate mitigating actions
3. Emergency services access
4. Noise pollution
5. Cycling
6. The pedestrians' environment

Reference is made to the *The Irish Cycle Facilities Manual* (Provision of Cycle Facilities: National Manual for Urban Areas): A Review, Comparison with International Practice, and Exploration of the Wider Issues Facing Irish Local Authorities, by Shane Foran, 2002 and to the *The Design Manual for Urban Roads and Streets* (DMURS): a joint publication launched in 2013 by the Department of Transport, Tourism & Sport and the Department of Environment, Community & Local Government. Its aim is to put well-designed streets at the heart of sustainable communities. Both these publications apply.

2.1 The effects of increased traffic on the local community

The proposed development at the former Good Shepherd Convent will create a huge volume of private vehicle traffic which will be orders of magnitude greater than the local road network can support.

The huge increase in traffic created during the construction phase will have a profoundly negative effect on the local community (see section 3 of this objection).

Convent Avenue

As the immediate street outside the sole entrance to the former Good Shepherd Convent, Convent Avenue would suffer the worst effects of the traffic generated by proposed development. This is a quiet, residential lane with family homes dating back centuries lining both sides of the street.

At 4760mm wide Convent Avenue fails to meet the minimum road width requirement as determined by the DMURS for a two way road (private vehicles only).

The applicant's claim that Convent Avenue is a two way carriage road is incorrect. In reality traffic on the steep section of the road from the former Good Shepherd Convent to Sunday's Well Road can only accommodate single lane traffic and an informal contra flow is in effect (see photo below).



During peak traffic times this leads to south bound vehicles queuing on the 90 degree corner directly outside the proposed development and on the bottom of Convent Avenue where queuing cars routinely block traffic on Sunday's Well Road.

The junction with Convent Avenue and Sunday's Well Rd. is a severely constricted 90 degree turn where long delays are already experienced by drivers travelling in all directions. The road is the sole access route for tour buses and coaches visiting the Cork City Prison which results in major traffic jams. The proposal to add hundreds of additional vehicles will result in complete gridlock at the junction of Convent Avenue and Sunday's well Road with profound knock on effects along the entire length of Sunday's Well Road and into the city.

As with all of the other possible access routes to the proposed site, Convent Avenue has a very steep gradient which already generates unacceptable levels of noise and air pollution for the existing residents. The added traffic and inevitable traffic jams will greatly worsen this risk to health and well-being of the community.

West bound on Convent Avenue towards Strawberry Hill there is a pinch point with a road width of 5520mm the south west corner of the Prison wall.

This pinch point is within 40 meters of highly dangerous junction with Strawberry Hill where vehicles driving down Strawberry Hill turn left on to Convent Avenue on a blind 90 degree bend. The driveway from the Lisheen which serves 12 residences opens directly onto this bend and there are three other private residential driveways which enter the roads at this junction.

The huge increase in traffic generated by the proposed development would completely block this busy intersection and prevent safe and reasonable access for residents.

Photo D below shows the view west from the Cork City Gaol on Convent Avenue toward the junction with Strawberry Hill. At location D the tour bus can just pass through this pinch but there is insufficient room for any east bound private vehicles.



The applicants have proposed to build an 1800m wide pedestrian footpath on the north side of Convent Avenue up to the junction with Strawberry Hill but have not stated when they propose to carry out this work. If they intend to build this footpath prior to the Construction Phase it should be noted that the footpath will reduce the road width at Pinch Point D to 3720mm and thus making it unsuitable for two way traffic. The proposed footpath with its imaginary 'pedestrian crossing' at Strawberry Hill will have no beneficial effect for pedestrians coming to or from the Cork City Prison trying to cross the dangerous T Junction between Strawberry Hill & Convent Avenue.

From the junction of Strawberry Hill to the Cork City Gaol on Convent Avenue there is no footpath and no street lighting whatsoever exposing pedestrians to an unacceptable degree of risk from the existing levels of traffic. The 'rationalisation of on street parking' proposed by the applicant will, in combination with the inevitable overspill from the proposed development will turn the area outside the Cork City Prison into a permanent car park, forcing pedestrians onto the roads and exposing them to unacceptable degrees of risk.

The idea that these pedestrian be forced to share the road with hundreds of additional private vehicles is unsafe and unacceptable.

Sundays Well Road

Photo A below shows the pinch point on Sunday's Well Road (looking east) from the junction with Shanakiel Road up to the junction with Convent Avenue.

The width of this segment of Sunday's Well Road is approximately 3980mm. This is more than 1 meter less than the minimum road width as specified in the DMURS for a local road with low to moderate levels of private vehicle traffic (not HGVs) and is insufficient to allow two cars to pass on this road segment. As a result there is an informal contra-flow in permanent effect at this location which causes long delays and tail backs with knock on-effects throughout the entire area. Although Sunday's Well Road is not suitable for HGV and buses it is constantly congested with these larger vehicles, causing severe traffic jams and pollution throughout the area.



Any proposal from the applicants to direct hundreds of private vehicles through this road, especially during peak traffic hours should be rejected on the grounds that the existing road is too narrow to permit two-way carriage for private vehicles. The road is already subject to high levels of congestion and any additional traffic will bring the entire local traffic flow to a standstill. Please note that there is no on street parking on this segment and no possibility of widening the road.

Sunday's Well Road east of the junction with Convent Avenue:

This section of road width varies between 4350mm by the blind junction with Buxton Hill and 4130 before St. Vincent's Church. Again, this is entirely inadequate for the existing levels of traffic in the. Contrary to the statement made by the applicants that Sundays Well Road is a two way carriage route, in reality the entirety of Sundays Well Road is too narrow to allow two-way traffic and fails to meet the minimum road width requirements as set out by the Dept. of Transport. Even at off peak times this section of Sundays Well Road operates as an informal contra flow route.

Sunday's Well Avenue:

This is a narrow, one way residential lane running south from Blarney Street to Sunday's Well Road. It is exceptionally narrow with a pinch point reducing the road to less than 2600mm. The junction of Sunday's Well Avenue with Sunday's Well Road at is very dangerous as drivers from Sunday's Well Avenue trying to merge with west bound traffic on a blind Y intersection, across the city bound lane coming east on Sunday's Well Road. This junction has no pedestrian crossings or road markings and poses a serious hazard for pedestrians on this, the main route from Sunday's Well to and from the City Centre.

Wises Hill (Sunday's Well Road to North Mall):

This route is subject to severe gradients and has a dangerous S bend at the bottom of the hill. On street parking along the majority of this hill reduces the road width in several long sections to less than 3420mm. The road is only wide enough to accommodate single lane traffic and an informal contra flow system is in permanent effect. Wises Hill is routinely used by HGVs, buses and coaches which cause severe traffic jams, noise and air pollution.

This primary road from the north west of the city to the city centre is already congested and in incapable of accommodating the huge increase in traffic that will be generated by the proposed development.



Strawberry Hill

Strawberry Hill is one of the steepest hills in the country with a gradient of 1 in 5. It is an old residential street with homes opening directly onto the road. It is narrow with regular pinch points reducing the road to less than 3300mm for prolonged sections where two-way private vehicle traffic is impossible.

The bottom section of Strawberry Hill from the junction with Convent Avenue downhill to the T-junction with Shanakiel Road is one-way south bound. Assuming that the vast majority of the 900+ occupants of the proposed development will be employed at Apple (Hollyhill) it is inevitable that Strawberry Hill will be subjected to the majority of the new private vehicle traffic.

On the bottom section of Strawberry Hill there are a number of private residences on the east side of the road which open directly onto the road where there is no public footpath. With existing levels of mostly private vehicles using the road this is already a dangerous situation for the residents including both senior citizens and families with very young children. The massive increase in private vehicle traffic generated by the proposed development will pose a direct threat to the safety and well-being of these residents.

It should also be noted that the main pedestrian route for tourists and school parties from Fitzgerald Park to the Cork City Gaol involves walking up Strawberry Hill where the footpath is dangerously narrow and obstructed by ESB poles. As a result pedestrians using this route are forced to walk on the road.

At the T-junction between Strawberry Hill and Shanakiel Road visibility to the west (right) is extremely restricted due to the high wall on the west corner at the bottom of Strawberry Hill which totally obscures the line of sight and traffic coming down Shanakiel Road (north bound). Visibility to the left is almost nil due to the tail back of traffic from the junction of Shanakiel Road & Sundays Well Road and positioning of telephone and ESB poles on the footpath.

As such, any vehicle attempting to turn right at the bottom of Strawberry Hill is almost entirely blind.

These two photos (below) show the impaired driver view to left & right at the junction of Strawberry Hill and Shanakiel Road. It should be noted that visibility at this junction fails to meet the requirements for Visibility Splays as set out on page 120 of the DMURS.



This junction is highly dangerous, congested and entirely unsuited as a right hand turn and yet the vast majority of the private vehicle traffic coming from the proposed development will be attempting to turn right towards Apple (Hollyhill). As a result there will be long tailbacks from this junction up Strawberry Hill and around the corner onto Convent Avenue.

With Convent Avenue reduced to less than 3520mm by the proposed new footpath this tailback will completely block city bound traffic coming down Strawberry Hill trying to turn left onto Convent Avenue.

Consideration must also be given to the residents of Shanakiel who already find it almost impossible to merge with south bound traffic on Shanakiel Road at this congested four way junction. Any suggestion that hundreds of additional private vehicles be directed from the proposed development on Convent Avenue, down Strawberry Hill onto the junction with Shanakiel would severely restrict accessibility for residents of Shanakiel.

Strawberry Hill - northbound (up-hill) from Convent Avenue to Blarney Street is one of the steepest inclines in the city and is entirely inadequate for two way private vehicle traffic with pinch point widths of 4650mm by the dangerous junction with Soho Terrace narrowing further to 3880mm at the T-Junction with Blarney Road.

The footpaths on Strawberry Hill are exceptionally narrow and uniformly fail to meet the minimum requirements as set out in the DMURS. Pedestrians on this route are frequently forced to walk on the road which poses an unacceptable risk especially for those with small children en route to both the Sundays Well National School on Blarney Street and the Creche on Strawberry Hill. Private homes on Strawberry Hill line the sides of the road and so are severely affected by noise and air pollution.

The proposed development will inevitably result in a massive increase in traffic trying to drive up Strawberry Hill on their way to and from Apple (Hollyhill). This will cause unimaginable noise & air pollution, pose an unacceptable hazard to other road users and pedestrians and would create total gridlock throughout the entire north side of the city.

Any attempt to use Strawberry Hill as an access route to or from the proposed development site would also cause massive traffic issues on Blarney Street which has road widths of less than 3200mm for the entire length of the road from Bakers Hill to Sunday's Well Avenue and down to the junction with Shandon Street.

These measurements directly contradict the applicant's claim that Blarney Street is a two-way carriage road.

The massive increase in traffic coming to and from the proposed development will block Strawberry Hill and force more vehicles onto Blarney Street. This is an old residential street with houses opening directly onto the street where residents are already exposed to severe noise and air pollution.

Blarney Street:

Blarney Street is already severely congested with rat run traffic trying to avoid congestion on Shanakiel Road and Sunday's Well Road and barely operates as an informal contra flow lane.

Contrary to the applicant's claims, Blarney Street is almost entirely a single lane road with a informal contra-flow system in permanent effect from Bakers Road all the way down to Shandon Street.

This is one of the oldest residential streets in the city with homes opening directly onto the street. Blarney Street is already severely affected by rat run traffic and serious congestion. In particular, HGVs including articulated trucks routinely attempt to drive down the street heading east from Apple which inevitably become lodged in the many pinch points. On the most recent occasion it took five gardai almost an hour to dislodge one such vehicle. The entire road and surrounding areas were completely inaccessible to all traffic for the duration.

2.2 Inadequate mitigating actions

The applicant has posed a number of actions described as 'mitigating actions' which are intended to improve the traffic situation in the area.

These proposals are limited to the roads within 200 meters of the proposed development and will have absolutely no remedial effect on local traffic or pedestrian routes that will be adversely affected by the huge increase in traffic generated by the proposed development.

The proposed actions will have little or no benefit for the local community and in all cases they could have a negative impact on local transport.

1: The applicant has proposed to build an 1800mm wide pedestrian footpath on the north side of Convent Avenue up to the junction with Strawberry Hill.

This footpath will reduce the road width at Pinch Point D to 3720mm and thus reducing it to a single lane road unsuitable for two way carriage traffic.

This new pinch point will result in traffic backing up on both Convent Avenue and up Strawberry Hill.

On Strawberry Hill the proposed footpath ends at an imaginary 'pedestrian crossing' where pedestrians will be forced to cross the dangerous hill on a 90 degree corner where the line of sight up Strawberry Hill is impaired. Having made the crossing through heavy traffic the pedestrians will be forced to walk on sub-standard, narrow footpaths which fall well below the minimum width requirements as set out in the DMURS and are further obstructed by ESB poles & high steps. As a result, pedestrians will be forced to walk on the busy road. In effect the proposed footpath on

Convent Avenue will restrict the safe flow of traffic while providing a route to nowhere for pedestrians.

The 1800mm wide footpath will also take up a significant area outside the Cork City Prison, reducing the number of parking spaces for visitors to this vital tourist attraction. It remains unclear if a concrete footpath will be permissible along the perimeter wall of a protected building of historical and architectural importance.

2: At the junction of Sunday's Well Road and Shanakiel Road the applicant proposes to widen the footpath on the south eastern corner of the junction.

This bulge will eliminate the informal slip lane at the bottom of Shanakiel Road which currently allows some city bound traffic to pull in to the left while they wait for an opportunity to merge with east bound traffic on Sunday's Well Road.

The pinch point on Sunday's Well Road immediately to the east of this junction causes long delays and congestion at the junction especially for the city bound traffic coming down Shanakiel Road. By eliminating the informal east bound slip lane all traffic coming down Shanakiel all traffic will be subject to far longer delays as the 1 in 20 cars that wish to turn left wait for an opportunity to join the city bound lane.

3: A 'table top' platform is proposed by the applicant for the 90 degree bend immediately outside the sole entrance to the proposed development's site on Convent Avenue.

This will create a significant ramp effect which may not leave sufficient clearance for the undercarriage of longer vehicles such as the Cork City Tour Bus and the many coaches coming up the steep gradient of Convent Avenue en route to the Cork City Prison to scrape.

It should also be noted that this corner is overshadowed by several large deciduous trees. During autumn the leaves from these trees would create a dangerously slippery surface on the proposed table top section.

2.3 Emergency services access

Existing levels of traffic congestion during peak hours already poses a serious problem for emergency services vehicles responding to incidents in the Sunday's Well and Blarney Street area. Navigating the narrow roads and manoeuvring around tight bends, especially during peak traffic times poses severe problems for the emergency services. It is highly unlikely that long ladder and snorkel fire engines required to tackle fires in tall buildings could reach any incident in the area within reasonable response times under existing circumstances. With the huge increase in traffic generated by the proposed development and the additional on road parking caused by overspill from the failure of the applicant to provide adequate on-site parking.

We submit that the proposed development will cause unacceptable delays to emergency response vehicles posing a serious threat to the safety of the existing community.

Furthermore, we contest that access to the proposed developments site during peak rush hours will be severely impeded by the hundreds of private vehicles trying to leave or entire the site. The inevitable tailbacks both within the proposed development and on the local road network will completely block emergency vehicles from accessing the site.

In the event of a fire in one of the multi-story flat blocks proposed by the applicant, long ladder and snorkel fire engines will be essential. We submit that these vital emergency response vehicles will not be able to navigate through the local road network or access the site thus posing an unacceptable risk to life and property.

2.4 Noise pollution

The Residents Association commissioned Bob Coughlan to take decibel readings at the junction of Sunday's Well Road and Shanakiel Road and the junction of Sunday's Well Road and Convent Avenue between 8am and 9am on Monday 20th November 2017.

The decibel count taken at the junction of Sunday's Well Road and Convent Avenue ranged between 75 and 96 decibels

The decibel count taken at the junction of Sunday's Well Road and Shanakiel Road ranged between 78 and 98 decibels.

The minimum safe noise levels as set out by the HSE are:
85dbs – risk of damage to hearing resulting from prolonged exposure
95dbs – severe risk of damage to hearing resulting from short term exposure

Based on our decibel readings at these key junctions it is clear that pedestrians and local residents are subject to unsafe noise levels generated by traffic.

The additional traffic generated by the proposed development will greatly increase the level of noise pollution in the area posing an unacceptable health hazard and negative impact on the quality of life for the existing community.

2.5 Cycling

The EIAR 2 Report section 8.7.5 Pedestrian and Cyclist Environment refers to the Cork City Cycle Network Plan which claims that Blarney Street, Shanakiel Road, Sundays Well Road and Thomas Davis Bridge routes are to be upgraded to provide primary cycle facilities.

However, the proposed Cork Cycle Network in the vicinity of Good Shepherd Site (Fig 8.10) will be problematic to implement for the reasons given below. In almost every case the local road network in the area surrounding the proposed development site cannot accommodate any degree of cycle routes that could comply with mandatory safety standards.

The severe gradients of the local roads including **Wises Hill, Shanakiel Road, Convent Avenue, Blarney Street** and **Strawberry Hill** eliminates all of these routes from any rational cycle route plan.

This is clearly confirmed in the Cork City Cycle Plan 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 roads are heavily congested with private vehicles and HGVs which are made even more dangerous by unregulated intersections and poorly maintained road surfaces. As such cycling on the roads anywhere in the locality is profoundly dangerous and poses a health and safety risk.

We challenge the applicants to imagine how the residents of the proposed development will cycle to the nearest supermarkets (Tesco – Wilton 4 Kms, Lidle - Mount Agnes Road 3Kms) for their weekly shopping.

Width of roads

Section (3.7.1) of The Provision of Cycle Facilities Manual states that “the **absolute minimum** for an on-road cycle track is 1.25m (excluding road markings). The preferred width of a single cycle lane is 1.5m.

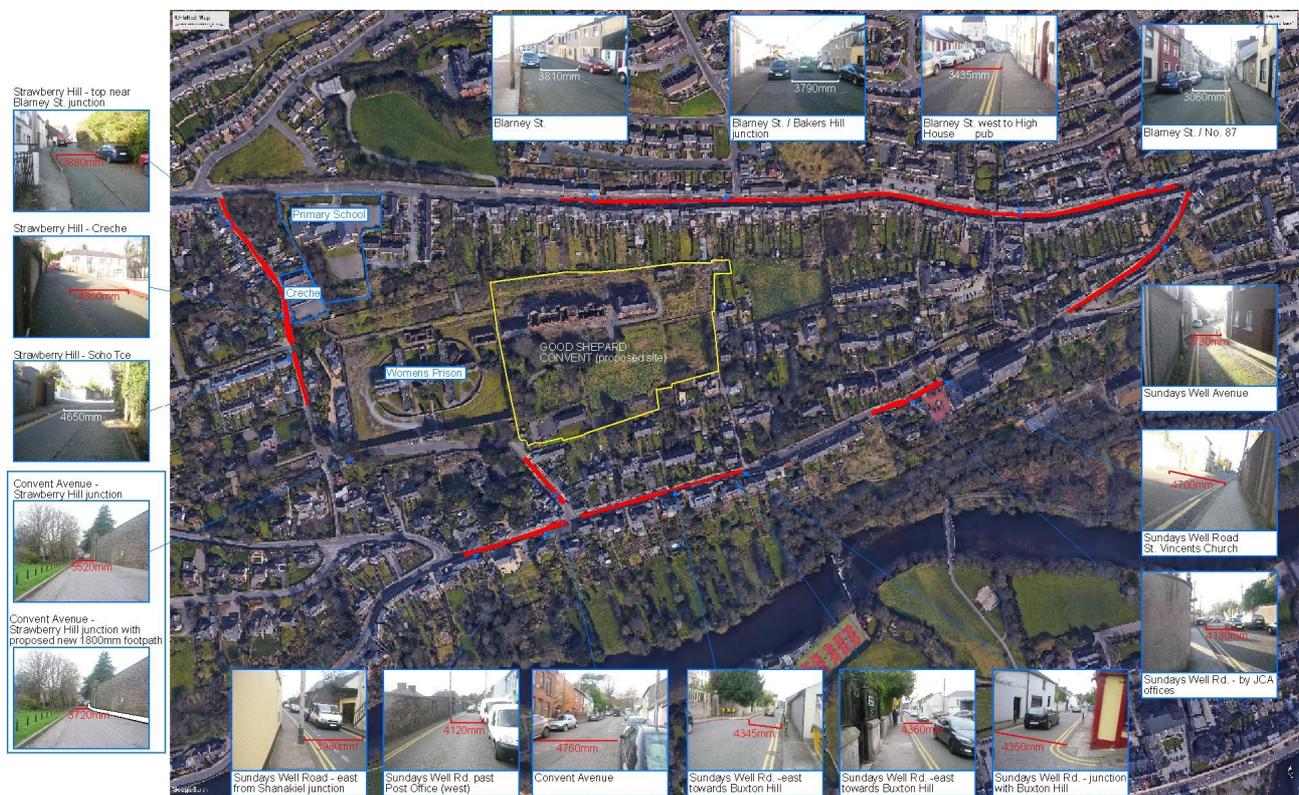
The Provision of Cycle Facilities Manual (chapter 3 page 65) states that the recommended width for a two way carriageway (not goods traffic) with a maximum speed of 30Kmph is calculated as follows:

$$0.25 + 1.75 + 0.30 + 1.75 + 0.25 = 4.30m$$

On roads used by goods vehicles the manual recommends the following measurements:
 $.25 + 2.60 + 0.30 + 2.60 + 0.25 = 6$ meters

The manual also states that “To give cyclists protection from opening car doors, a deterrent strip of 0.80m wide between the parking lane and on-road cycle lane must be provided”

The satellite photo of the Sundays Well and Blarney Street area shown below provides detailed road width measurements of pinch points on the local road network.



Based on these measurements it is absolutely clear that none of the local roads are wide enough to accommodate cycle paths.

For example – the road section east bound on Sundays Well Road from the junction with Shanakiel Road is 3980mm wide including road markings and less than 3100 excluding road markings. To provide a safe cycle path along this section of Sundays Well Road requires a minimum width of 4300mm. Even excluding all road traffic from this critical route would be insufficient to create a safe and compliant cycle route.

The section of Sundays Well Road from Convent Avenue to St. Vincent's church has an average road width of 4245mm with on road parking on both sides reducing the available road space to 2645.

Given that Sundays Well Road is subject to regular HGV traffic the minimum road width required for cycle paths should be 6000mm.

Blarney Street has road widths ranging from 3800mm by Bakers Hill to 3060mm near the junction with Sundays Well Avenue. To provide the recommended 800mm clearance from parked cars and excluding road markings this leaves a remaining road width of 1,860mm which is insufficient for a two way cycle path let alone two way vehicle traffic.

The suggestion that Strawberry Hill, with a gradient of 1 in 5 'could become a cycle feeder route' beggars belief and exposes these proposals as a meaningless paper exercise by individuals with no understanding of the regulations, the reality of local traffic or basic topography. Strawberry Hill has been named '*a real beaut – if you can call it that*' on the Cork City Cycle Blog – a comments board for serious sports cyclists. To suggest that that this could possibly be regarded as a plausible route for any but the fittest competitive cyclist is ridiculous. Furthermore, with long stretches of pinch points with an average width of 3880m Strawberry Hill is too narrow to facilitate cycle routes in accordance with the mandatory width requirements.

The manual states that at the bottom of very steep hills a level braking platform of 5m should be provided. This is impossible to implement at the foot of either Strawberry Hill or Convent Avenue.

The same restrictions apply to Shanakiel Road (5330mm wide including road markings) and Convent Avenue (4760mm not including the required for clearance from parked cars) both of which are subject to high volumes of HGV traffic and thus subject to the minimum 6000mm mandatory width requirement.

2.6 The pedestrians' environment:

The applicant's claim that the footpaths in the Receiving Area are 'good' is without foundation.

Without exception the local footpaths, where they exist, do not comply with the mandatory minimum footpath width as set out by the DMURS. They are exceptionally steep, in poor condition, poorly lit, obstructed by wheelie bins, telephone and ESB poles.

The applicant's claim that the 900+ residents of the proposed development will be able to walk to work, the city centre, UCC and other distant locations is unsubstantiated.

To suggest that the supposed residents will walk to work at Apple which is located 2.2kms away at the top of some of the steepest hills in the city via a totally neglected and substandard network of footpaths is fanciful. As a source close to Apple told us, all their employees, even those that live less than ten minutes away, drive to work. This is why Apple is expanding its current 4,700 space car park.

The development cannot be accessed by wheelchair users and access for residents with buggies and pushchairs is severely limited; we note that a Creche is planned for the development.

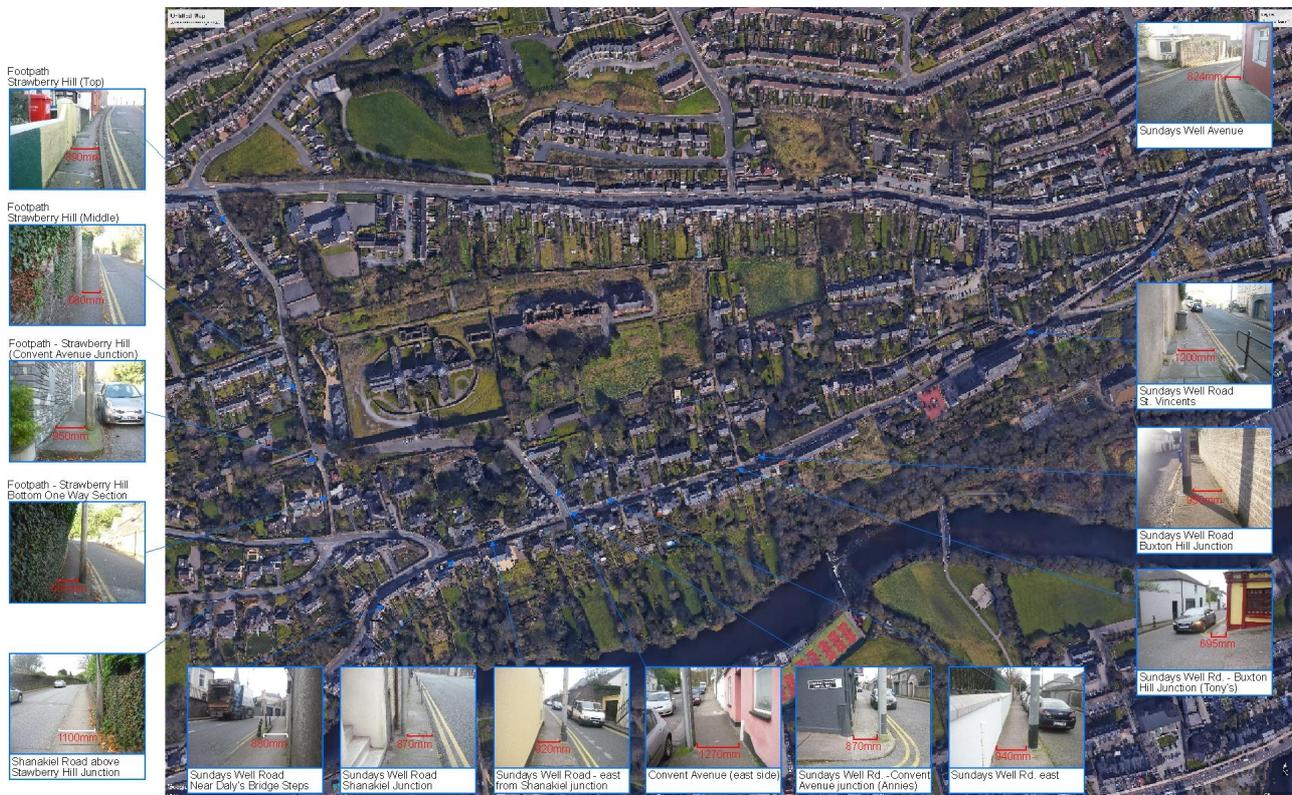
The suggestion that the 900+ residents of the proposed development will walk to nearest supermarket to do their weekly shopping when the nearest supermarkets are Tesco (Wilton) – 3.2 kms and Lidle (Mount Agnes Road) 2.1 kms is fanciful.

The applicants claim in section 8.7.5 that “the surrounding road network has footpaths throughout, providing good access to the wider community”. This claim is incorrect. The footpaths, where they exist at all, without exception fail to meet the minimum standards as set out by the Dept of Transport DMURS manual which states that the minimum width for a local footpath must not be less than 1800mm.

In several key locations the footpaths are in a state of dangerous disrepair and are subject to some of the most severe gradients in the city which are challenging to the fit and able bodied and all but impassable for the elderly, disabled or parents with prams and buggies.

Detailed notes on the pedestrian environment

The map below shows the footpath network in the Sunday's Well area with embedded photos showing the actual width and general condition of the local footpaths.



None of the footpaths leading to or from the proposed development at the Good Shepherd Convent meet the mandatory minimum 1800mm width requirement as set out by the Dept. of Transport DMURS document

The footpaths immediately outside the proposed development on **Convent Avenue south bound to Sunday's Well Road** are less than 1350mm wide and are obstructed by telephone poles which reduce the footpath width to 1270mm.

At the corner of **Convent Avenue and Sundays Well Road (Annie's)** the footpath is 870mm wide. This is insufficient for a standard buggy or wheelchair to pass.

West bound on Convent Avenue across from the Cork City Prison the footpath on the south side of the road is obstructed by a telephone pole, leaving less than 340mm for pedestrian access which again forces people to walk on the road.

From main entrance of the Cork City Prison to Strawberry Hill there is no footpath whatsoever. The risks for pedestrians on this section are even greater due to the total lack of street lighting, significant on road parking and heavy coach and tour bus traffic. The applicants have proposed to add an 1800mm wide footpath along the front of the prison wall which will significantly reduce the available parking spaces for this vital tourist attraction. The proposed new footpath only leads up onto a blind corner on the junction with Strawberry Hill to a point where there is no pedestrian crossing and very restricted lines of sight. It remains to be seen if the proposed new footpath will be

permitted as it is intended to run along the perimeter wall of the Cork City Prison which is a protect structure of historical and architectural importance. It will also reduce the road width near the dangerous junction with Strawberry Hill from 5520mm to 3720mm, creating a new pinch point where two way traffic will be unable to pass.

The footpaths along the **entire length of Sundays Well Road east bound** towards the City Centre from the junction with Convent Avenue are regularly obstructed by telephone and ESB poles, reducing the footpath width to less than 940mm in direct violation of the DMURS requirements. At the **junction of Sundays Well Road and Buxton Hill** the footpath is barely 700mm wide and has been severely damaged by vehicles mounting the pavement at this traffic pinch point. This is an exceptionally dangerous junction for pedestrians who must pass single file outside the former butchers shop, avoid vehicles mounting the footpath and then cross the road at the bottom of Buxton Hill which is a blind 90 degree corner before remounting the footpath.

The footpath on **Sundays Well Avenue leading from Sundays Well Road to Blarney Street** is less than 820m and has been badly damaged by traffic mounting the pavement at several points.

West bound on Sundays Well Road from the junction of Convent Avenue the footpath outside the local Post Office is in poor repair and as it approaches the dangerous junction with Shanakiel Road the footpath is again obstructed by ESB poles which reduce the path width from an average of 1060mm to less than 920mm.

On the **south side of Sundays Well Road** which is the only pedestrian route from Sundays Well to Fitzgerald Park, the main bus route on the western road and UCC the footpath tapers to less than 430mm at the point where most pedestrian try to cross Sunday's Well Road. Further west near the steps leading to the Shaky Bridge the footpath measures a mere 880mm. Please note that the bollards along this segment of Sundays Well Road have been smashed by vehicles unable to squeeze through the narrow roads. At these highly dangerous locations pedestrians are constantly forced to step on to the main road. For parents with buggies and small children with bicycles this is an extremely dangerous route. It is absolutely impassable for wheelchairs.

The 'desired' route promoted by the applicants that leads from **Sunday's Well Road down a steep flight of steps to the Shaky Bridge** is inaccessible for wheelchair users and difficult for prams and buggies. The Shaky Bridge (Daly's Bridge) is in a very poor state of repair and recent safety concerns have been raised which suggest that it may be unsafe and should be closed to all pedestrian traffic.

The steps, Shaky Bridge and entire route south past Fitzgerald Park to the Mardyke is poorly lit and in the hours of darkness the area is subject to high levels of anti-social behaviour and crime. To suggest that residents of the proposed development and the local community should use this route to UCC and the main bus routes on the Western Road, especially at night is highly irresponsible.

Walking up the exceptionally steep (1 in 5) gradient of **Strawberry Hill from the junction with Convent Avenue** the footpaths are in very poor repair with several high steps where the footpath gives way to driveways. The average footpath width varies between 890mm to 680mm and is regularly obstructed by telephone and ESB poles. At the junction with Soho Terrace the footpath vanishes for more than 20 meters and this area is used by vehicles trying to pass each other at the pinch point on the road. It should be noted that the grossly inadequate footpath in this area is

supposed to service the Creche in the Strawberry Hill Community Centre and the Sundays Well National School on Blarney Street.

On **Shanakiel Road from the junction with Strawberry Hill** the footpath is in a state of near total neglect, having vanished below the level of the main road. It is cluttered with telephone poles, the paving surface has been crushed by parked vehicles and there are by several high steps cause by intersecting driveways. The condition of the pavement makes this route dangerous for able bodied pedestrians, hazardous for pedestrians with prams and buggies and inaccessible to wheelchair users.

North bound on Shanakiel Road from the junction with Strawberry Hill the average footpath width is 1230mm, far below the 1800mm minimum requirement. This section is a very long section with a steep gradient. At the hairpin bend at the top of Shanakiel Road (reservoirs) the footpath width narrows to 840mm and is a state of severe neglect having been routinely crushed by vehicles unable to make the turn at this pinch point. Pedestrian traffic, including the majority of tourists and school parties walking from Fitzgerald Park to the Cork City Gaol walk up the bottom section of Strawberry Hill, usually on the road as the footpath is less than 970mm wide and obstructed by an ESB pole which reduces the average footpath width 680mm.

The **footpaths on Blarney Street**, while wider than Sundays Well Road are frequently obstructed by telephone and ESB poles and by refuse wheelie bins. The gradient, especially on the section between Sundays Well Avenue and Bakers Road is steep and difficult for prams and buggies and unsuitable for wheelchair access.

The only **pedestrian crossing** in the entire area is located on Sundays Well Road between the junction with Shanakiel Road and the steps leading to Fitzgerald Park. This crossing services only the dozen or so houses on the north side of Sundays Well Road however, it is often used by tourists walking to the Cork City Prison who then find themselves stranded on the lethal 140 degree hairpin corner of Shanakiel Road and Sundays Well Road where there is no further pedestrian crossing point and where there is no line of sight in either direction. The applicants propose to create an 'informal' pedestrian crossing at this junction which, given the huge volume of traffic at this junction will be of very little practical use and could put pedestrians at needless risk trying to cross a road to nowhere. This is the main pedestrian route the applicants suggest their proposed new residents to the only local bus stop on the western end of Sundays Well Road. It should be noted that this **orbital bus route** provides only 7 services a day linking the remote western suburbs to the northern outskirts of the city and as such is of very little practical use to local residents and is almost always empty. It does not operate at weekends.

3. The effects of construction traffic on local traffic and the community

The applicants seek falsely in the EIAR 2 to minimise the effects of the projected 4-year construction period of the proposed development. This section, with the aid of detailed visuals, demonstrates that the claims by applicant of minimal disruption and interference to the local population are totally unfounded and spurious. We prove that, given the local road and traffic conditions, any development of this magnitude is simply not viable. It is obvious that the applicants have not examined or researched the facts and have no real knowledge of the Sunday's Well Area to be able to put forward a reasonable and practical proposition. They have chosen to ignore the City Council's own document when assessing the impact of all traffic and the impracticality of large volumes of construction traffic accessing and egressing the area. There is a real risk that unless the applicants are forced to examine the effect of their proposals and significantly scale down, that they will at some stage walk away from the development and declare themselves bankrupt, leaving a half-completed building site behind (see section 9 of this objection).

The *Cork City Development Plan 2015-2016 Vol 3*, on Sunday's Well states:

“The principal street in the ACA, Sunday's Well Road, is narrow without sufficient room for two cars to pass along all of its length.....Intensification of vacant and under-used sites, for example in Sub-area D, is problematic because of poor access and integration of the sites with the already narrow existing road network.”

The construction phase of the proposed development at the former Good Shepherd Convent will create a massive volume of HGV and workforce traffic for the duration of the construction phase which will be orders of magnitude greater than the local road network can support.

The effect of this HGV traffic will be profound, causing severe traffic congestion in a traditional residential area already subject to excessive levels of traffic which, in turn will create serious knock-on traffic problems throughout the north and west sides of the city and to commuters to the city centre businesses from outlying dormitory suburbs.

The noise and air pollution caused by the proposed construction traffic will seriously undermine the health & quality of life of all local residents with increased risk of accidents on local routes.

The removal of residents parking in order to facilitate the huge volume of HGV traffic generated during the proposed construction phase will cause serious hardship for residents, especially the many elderly residents and young families of Convent Avenue. Residents of the entire area will be denied to access their homes at times and their ability to conduct normal business and daily activities will be severely impacted. See section 5 of this objection for our parking concerns.

3.1 The removal of spoils

The enormity of the proposed development and its effects on the local traffic network and residents can be seen in this first phase of the proposed development.

In Section 8.5 of the EIAR 'Impact of Construction of the Proposed Development – Construction Phase' the applicants state that they propose to remove 13,000m³ of excavated material from the site over a nine week period.

Given that the maximum load capacity of a standard HGV is approximately 8m³ (which may be further restricted when operating in areas with steep gradients) the removal of spoils from the site will result in approximately 3,250 HGV journeys.

Given the severely restricted nature of the surrounding roads it is highly improbable that the number of vehicle trips can be reduced through the use of larger, articulated vehicles.

According to the Environmental Impact Report (section 8.7. 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.*"

According to section 8.7.7.2 Hours of Working work on site will be at 7am to 7pm Monday to Friday and 7am to 2pm on Saturdays and they specify that they expect to have 10 HGV trips per hour even during rush hour periods.

To meet their stated 9 week deadline for the removal of spoil from the site this rate will have to be maintained for every single working hour (67 working hours per week x 9 weeks = 603 hours divided by 3,250 HGVs = 10 HGV trips per hour.

It is clear from the applicant's own figures and schedule that they intend to maintain a constant stream of HGVs to and from the site at a rate of 1 truck every 6 minutes for 12 hours every day and 6 hours on Saturdays for nine solid weeks.

The applicant's claim that only 'certain routes' will be affected is a pointless statement as the former Good Shepherd Convent can only be accessed directly via Convent Avenue, Sunday's Well Road and Strawberry Hill all of which are unfit for any level of HGV traffic.

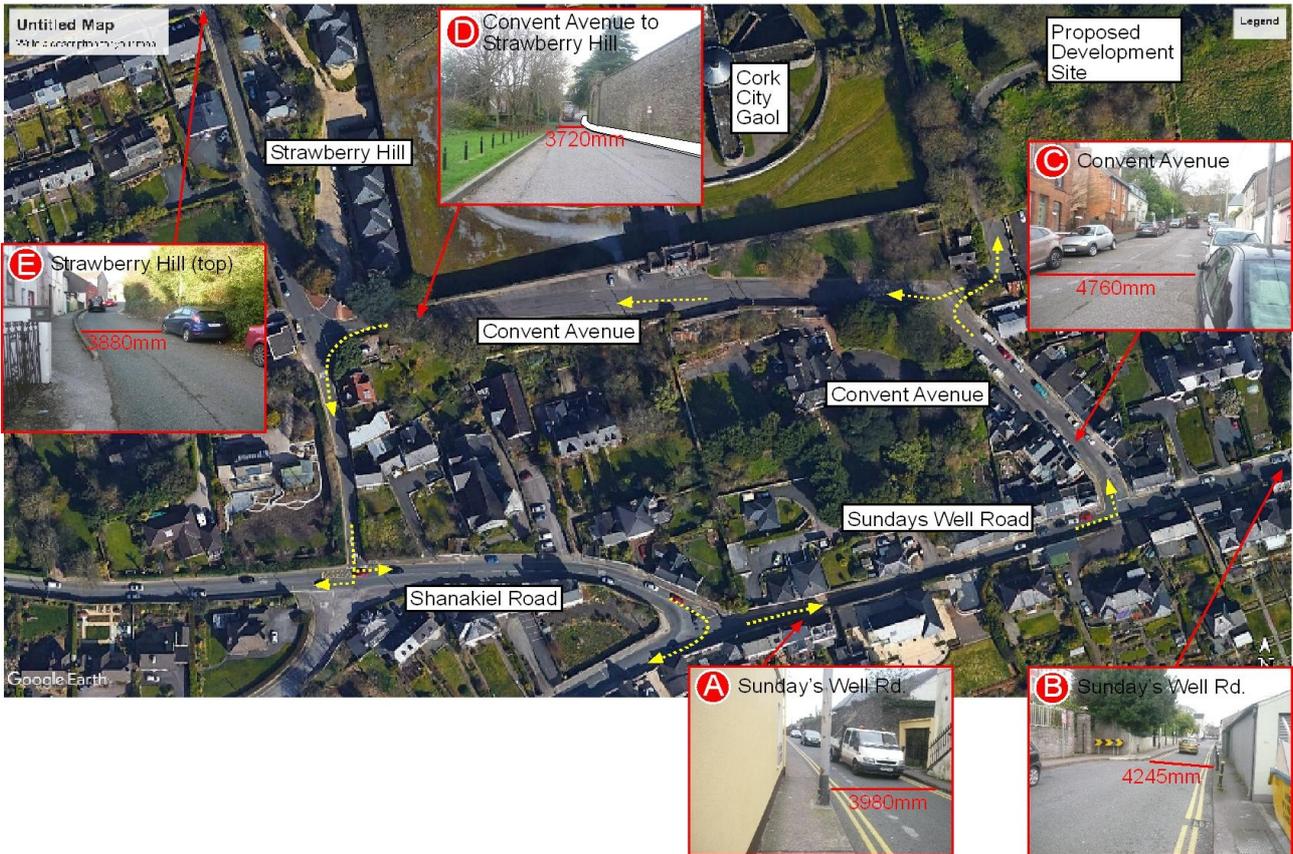
This unimaginable volume of heavy trucks will have a catastrophic effect on local traffic with incalculable knock on effects on radial and feeder routes throughout the north side of the city.

The Department of Transport, Tourism and Sport 2017 document "*Design Manual for Urban Roads and Streets (DMURS)*" states that the mandatory minimum width required for a two carriage way local road (private vehicles only) must not be less than 5 meters. To accommodate both private vehicles and HGVs the DMURS (Page 113) manual recommends a minimum road width of no less than 6m.

The satellite photo below shows the local roads around the proposed development with detailed road width measurements and photos of major pinch points on all access routes to the proposed development site.

These measurements clearly show that the roads in the Sundays Well / Blarney Street area do not meet the road width minimum requirements for even private vehicles, let alone HGV traffic.

Construction Traffic - Pinch Points



3.2 Detailed examination of HGV access routes

Possible HGV Access Route 1: Sundays Well Road

Photo A below shows the pinch point on Sunday's Well Road (looking east) from the junction with Shanakiel Road up to the junction with Convent Avenue.

The width of this segment of Sunday's Well Road is approximately 3980mm. This is more than 1 meter less than the minimum road width as specified in the DMURS for a local road with low to moderate levels of private vehicle traffic (not HGVs) and is insufficient to allow two cars to pass on this road segment. It is entirely unsuitable for HGVs. As a result there is an informal contra-flow in permanent effect at this location which causes long delays and tail backs with knock on-effects throughout the entire area.



Any proposal from the applicants to direct thousands of HGVs on this road should be rejected on the grounds that the existing road is entirely unsuitable for any HGV traffic, the road is already subject to high levels of congestion and any additional HGV traffic, let alone the thousands of trucks required by the spoil removal phase, will bring the entire local traffic flow to a standstill.

Please note that there is no on street parking on this segment and no possibility of widening the road.

The junction of Sunday's Well Road and Shanakiel Road is a 140 degree switchback corner with a significant gradient on Shanakiel Road. It is totally unsuitable for HGVs. The photo below clearly illustrates that to turn this corner requires the HGV to cross into the oncoming lane, completely obstruction south bound traffic. HGVs frequently have to stop and reverse back onto Sunday's Well Road in order to manouver around the corner. This is a highly dangerous action which poses serious risks to all road users.



Sunday's Well Road east of the junction with Convent Avenue

This section of road width varies between 4350mm by the blind junction with Buxton Hill and 4130 before St. Vincent's Church. Again, this is entirely inadequate for the existing levels of traffic in the area and entirely unsuitable for the continuous stream of HGVs.

Contrary to the statement made by the applicants that Sundays Well Road is a two way carriage route, in reality the entirety of Sundays Well Road is too narrow to allow two-way traffic and fails to meet the minimum road width requirements as set out by the Dept. of Transport. Even at off peak times this section of Sundays Well Road operates as an informal contra flow route.

As such the entirety of Sundays Well Road should be rejected as an access route for the proposed development.

Possible HGV Access Route 2: Strawberry Hill

The bottom section of Strawberry Hill from the junction with Convent Avenue downhill to the junction with Shanakiel is one-way south bound so cannot be considered as an *approach* route to the proposed development. The potential for brake failure or driver error on a laden HGV attempting to drive *down* Strawberry Hill poses a serious threat to all road users especially at the blind T-junction between Strawberry Hill & Shanakiel Road. In recent years, a brake failure in a lorry descending down Shanakiel resulted in the death of a driver trapped in his car in a traffic jam on Sunday's Well Road. He managed to get his daughter, whom he was taking to school that morning, to escape from the passenger door. Nobody would wish to see this happen again.

On the bottom section of Strawberry Hill there are a number of private residences on the east side of the road which open directly onto the road where there is no public footpath. With existing levels of mostly private vehicles using the road this is already a dangerous situation for the residents including both senior citizens and families with very young children. The massive increase in HGV traffic caused by the construction phase of the proposed development will pose a direct threat to the safety and well-being of these residents to the extent that they may not be able to continue living in their homes during the proposed 2 year construction phase of this development.

It should also be noted that the main pedestrian route for tourists and school parties from Fitzgerald Park to the Cork City Gaol involves walking up Strawberry Hill where the footpath is dangerously narrow and obstructed by ESB poles. The mandatory minimum width for a footpath as stated in the DMURS is 1800mm yet this route is restricted to 680mm wide. As a result pedestrians using this route are forced to walk on the road.

Any attempt by the applicants to open this section of Strawberry Hill to two way HGV traffic will be fiercely resisted by the entire community. On purely practical grounds, an HGV attempting to drive up the 1 in 5 gradient of Strawberry Hill will burn out both clutch and gearbox and the possibility of brake failure and roll-back on such an incline would make this route profoundly dangerous and utterly unacceptable.

At the T-junction between Strawberry Hill and Shanakiel Road visibility to the west (right) is extremely restricted due to the high wall on the west corner at the bottom of Strawberry Hill which

totally obscures the line of sight and traffic coming down Shanakiel Road (north bound). Visibility to the left is almost nil due to the tail back of traffic from the junction of Shanakiel Road & Sundays Well Road and positioning of telephone and ESB poles on the footpath. As such, any vehicle attempting to turn right at the bottom of Strawberry Hill is almost entirely blind.



Driver view to left & right at the junction of Strawberry Hill and Shanakiel Road

It should be noted that visibility at this junction fails to meet the requirements for Visibility Splays as set out on page 120 of the DMURS.

Consideration must also be given to the residents of Shanakiel who already find it almost impossible to merge with south bound traffic on Shanakiel Road at this congested four way junction. Any suggestion that thousands of HGVs be directed down Strawberry Hill onto the junction with Shanakiel would have a totally negative impact on accessibility for residents of Shanakiel.

Strawberry Hill Northbound (uphill) from Convent Avenue to Blarney Street is one of the steepest inclines in the city and is entirely inadequate for two way private vehicle traffic with pinch point widths of 4650mm by the dangerous junction with Soho Terrace narrowing further to 3880mm at the T-Junction with Blarney Road.

The footpaths on Strawberry Hill are exceptionally narrow and uniformly fail to meet the minimum requirements as set out in the DMURS. Pedestrians on this route are frequently forced to walk on the road which poses an unacceptable risk especially for those with small children en route to both the Sundays Well National School on Blarney Street and the Crèche on Strawberry Hill.

Private homes on Strawberry Hill line the sides of the road and so are severely affected by noise and air pollution. Any HGV vehicle attempting to use Strawberry Hill to Blarney Road will cause unimaginable noise and air pollution, pose an unacceptable hazard to other road users and pedestrians and would create total gridlock throughout the entire north side of the city. The density of the amount of vehicles needed for the proposed construction would in effect mean that there would be a continual noise and air pollution from 7am till 7pm.

Any attempt to use Strawberry Hill as an access route to or from the proposed development site would also cause massive traffic issues on Blarney Street which has road widths of less than 3200mm for the entire length of the road from Bakers Hill to Sunday's Well Avenue and down to the junction with Shandon Street.

These measurements directly contradict the applicant's claim that Blarney Street is a two way carriage road.

Blarney Street is already severely congested with "rat run traffic" trying to avoid congestion on Shanakiel Road and Sundays Well Road and barely operates as an informal contra flow lane.

Possible HGV Access Route 3: Convent Avenue

As the immediate street outside the sole entrance to the former Good Shepard Convent, Convent Avenue would suffer the worst effects of the traffic generated by proposed development.

This is a quiet, residential lane with family homes dating back centuries lining both side of the street.

At 4760mm wide Convent Avenue fails to meet the minimum road width requirement as determined by the DMURS for a two way road (private vehicles only). The applicant's claim that Convent Avenue is a two way carriage road is false and should be rejected. In reality traffic on the steep section of the road from the former Good Shepard Convent to Sunday's Well Road is one way and an informal contra flow is in effect (see photo below).



Informal contra-flow on Convent Avenue

During peak traffic times this leads to south bound vehicles queuing on the 90 degree corner directly outside the proposed development and on the bottom of Convent Avenue where queuing cars routinely block traffic on Sunday's Well Road.

The junction with Convent Avenue and Sunday's Well Rd. is a severely constricted 90 degree turn which would inhibit access for HGVs and especially longer vehicles required to deliver bulldozers and other construction equipment to and from the proposed site. A single HGV or long loader vehicle attempting to manoeuvre on this critical junction would create traffic gridlock along the entire length of Sunday's Well Road and throughout the northwest quarter of the city. Any suggestion that Convent Avenue be used as a viable access route for thousands of HGVs is totally unrealistic and should be entirely rejected.

As with all of the other possible access routes to the proposed site, Convent Avenue has a very steep gradient which is unsuitable for HGVs. Any vehicle attempting to drive up Convent Avenue from the junction with Sundays Well Road would produce unacceptable noise and air pollution and the density of the proposed traffic would mean constant noise and air pollution for 12 hours of every working day. The consequence of brake failure or driver error on this steep incline would be catastrophic.

To facilitate access to and from the proposed site the applicants allude to a ‘rationalisation of residential parking’. In practical terms this will require the **permanent removal** of all on street parking for residents on Convent Avenue for the entire two years of the construction phase of the proposed development.

Parking in the area of Sunday’s Well Road is already severely limited with occupancy on most nights at above 90% so there are few if any alternative parking spaces for residents of Convent Avenue.

The only alternative for these residents will be to park outside the Cork City Prison. This is a crime and anti-social behaviour black-spot with little or no street lighting where theft from parked cars is a common occurrence. The footpath from Sundays Well Road up Convent Avenue as far as the entrance to the Cork City Prison is dangerously narrow and blocked by telephone poles and there is no footpath for the 260m from the Prison to Strawberry Hill.

To suggest that residents of Convent Avenue, including many senior citizens be forced to park hundreds of meters from their homes, up a steep hill and in an unlit and unsafe location in order to accommodate this development is entirely unacceptable.

The forced relocation of more than 30 resident’s vehicles to the road outside the Cork City Gaol will also deprive the city’s single biggest tourist attraction of vital visitor parking spaces, jeopardising the viability of this long established local business.

Although the applicants have failed to provide any details of their proposed traffic management plans it seems inevitable that they will also need to eliminate the parking spaces on Sunday’s Well Road on either side of the junction with Convent Avenue. This will severely restrict access to the local post office causing severe hardship, especially for pensioners and threatening the viability of this essential local service.

The photo below shows the section of Sunday’s Well Road immediately west of the junction with Convent Avenue. The photo highlights the exceptionally narrow road, the tight corner onto Convent Avenue and the essential parking required for the normal operation of the Post Office and Vickies cafe.



West bound on Convent Avenue towards Strawberry Hill there is a pinch point with a road width of 5520mm the south west corner of the Prison wall.

This pinch point is within 40 meters of highly dangerous junction with Strawberry Hill where vehicles driving down Strawberry Hill turn left on to Convent Avenue on a blind 90 degree bend. The driveway from the Lisheen which serves 12 residences opens directly onto this bend and there are three other private residential driveways which enter the roads at this junction.

The massive number of HGVs required for the Spoil Removal phase of the proposed project would completely block this busy intersection and prevent safe and reasonable access for residents. Photo D below shows the view from the Cork City Tour bus driving west from the Cork City Gaol on Convent Avenue toward the junction with Strawberry Hill. At location D this bus can just pass through this pinch but there is insufficient room for any east bound private vehicles.



The applicants have proposed to build an 1800m wide pedestrian footpath on the north side of Convent Avenue up to the junction with Strawberry Hill but have not stated when they propose to carry out this work. If they intend to build this footpath prior to the Construction Phase it should be noted that the footpath will reduce the road width at Pinch Point D to 3720mm and thus making it unsuitable for two way traffic. The proposed footpath with its imaginary 'pedestrian crossing' at Strawberry Hill will have no beneficial effect for pedestrians coming to or from the Cork City Prison trying to cross the dangerous T Junction between Strawberry Hill & Convent Avenue.

From the junction of Strawberry Hill to the Cork City Gaol on Convent Avenue there is no footpath and no street lighting whatsoever exposing pedestrians to an unacceptable degree of risk from the existing levels of traffic. The idea that these pedestrian be forced to share the road with thousands of HGVs is unacceptable.

3.3 Amount of construction phase traffic

The quantity of heavy industrial equipment including bulldozers, diggers, cranes, pile drivers, scaffolding & formwork, porta-cabins required for a project on this vast scale will be huge. Many of these items will require exceptional wide load / long load transportation. Given the narrow road network and tight corners through the local area movement of these loads will be almost impossible and will, if attempted cause massive disruption to traffic and the local community.

The delivery of construction materials will require a huge number of HGV journeys. Although the applicant has not submitted a detailed estimate of the quantities required the Residents Association have been informed by an experienced construction contractor that he estimates a minimum of 2000m³ of ready mixed concrete will be required. The maximum load capacity for a ready mix

HGV on steep inclines is 6m³. This will result in approximately 666 HGV journeys to and from the site. Each ready mix truck will have to be washed out on site after offloading which will generate a huge quantity of contaminated water which in turn will have to be removed from the site by a fleet of tankers. The project will consume huge quantities of rebar steel and structural steel, blocks, timber, drainage pipes, plaster board, windows and other bulky materials.

In the absence of detailed quantity assessments it is impossible to calculate the exact number of HGV journeys the proposed development will generate but, including the spoil removal phase we estimate that a total figure of between 4700 and 5700 HGV journeys will be required.

This will have a devastating impact on the quality of life of the local community and will have an incalculable impact on traffic throughout the local area and the entire north west area of the city.

3.4 Emergency services access during the construction phase

The severe impact of HGV traffic that would result from the proposed development will cause major delays for emergency services vehicles responding to situations in the affected area. In the event of an emergency we, the residents have grave concerns that ambulances, Gardai and especially the larger Fire Brigade vehicles will be unable to reach incidents in the Sundays Well and Blarney Street area within ERT response time guidelines.

We request that the emergency services provide their current response time estimates for Sundays Well and Blarney Street, with any records they may have relating to actual emergencies in the area. We also request that they re-examine their current response time estimates in light of the massive increase in HGV traffic and resulting congestion that will inevitably result from this proposed development.

4. Access to Essential Amenities

In the 'Background' section of their planning application the applicant makes a series of factually incorrect and misleading statements regarding the accessibility of the proposed development site to local amenities.

In section 2.3 the applicant states:

“the site has good public transport connectivity to the city centre and the southern side of Cork City. The site is located approximately 400m from the nearest Bus Eireann bus stop”

“The site is also connected to the city centre by a good network of footpaths, approximately 1.5kms.”

In section 8.7.5 the applicant goes on to suggest that *“the proposed development is within comfortable walking distance of a wide range of amenities and employment centres.”*

We are extremely disappointed that our detailed analysis of the local roads, footpaths, cycle routes (see section 2 of our objection) and public transport (see section 7) clearly prove that these statements are entirely without foundation and reflect **a profound lack of knowledge or indeed any research of professional calibre** into the true nature of the Sunday's Well area.

4.1 Shopping

The main shopping areas of Cork City such as Patrick Street, Oliver Plunkett Street and the network of intersecting shopping streets are on average 3kms from the proposed development site (not 1.5Kms as stated by the applicant).

There are no public transport routes linking the Sunday's Well area or Blarney Street to the City Centre.

The 3 km route into the city centre takes in the long and severe gradient of Wise's Hill and requires pedestrians to cope with substandard footpath network which is totally inaccessible to wheelchair users and poses a serious hazard for prams and buggies.

There are no supermarkets within 3kms of the proposed development with the nearest being Tesco (Paul Street, 3kms), Lidl (Mount Agnes Road, 3kms) and Tesco (Wilton, 4kms). To reach any of these supermarkets by foot involves a long walk on substandard and incomplete footpaths which include some of the steepest gradients in any urban area in the country. To suggest that any occupants of the proposed development could or will walk to and then haul bags of shopping home from these distant supermarkets for their weekly shopping is not credible. All shopping journeys will require private vehicle transport.

4.2 Dining out and entertainment

There is an Indian restaurant soon to open at the junction of Sunday's Well Road and Convent Avenue and one recently opened bistro. That's all for the Sunday's Well Area / Blarney Street area.

All dining out requires private transport, especially for a journey back home at night. Although there are still some pubs in the area, clubs and young people's venues are located in the city centre.

4.3 Schools

The only national school in the area is the Sunday's Well National School on Blarney Street. To access this school from the proposed development will require parents and children to tackle Strawberry Hill which has a gradient of 1 in 5 making it one of the steepest hills in the city. The footpaths on Strawberry Hill are in a state of poor repair and fail to meet the minimum width requirement as set out in the DMURS manual. They are frequently obstructed by telephone & ESB poles which force pedestrians to walk on the busy roadway. Strawberry Hill is totally inaccessible to wheelchair users and unsuitable for prams and buggies with a risk to the health and safety of the children being carried.

There are no secondary schools in the area and so the vast majority of school runs must be made by private vehicles. All inhabitants of Cork notice the dramatic decrease in car traffic on days when schools are closed.

4.4 Workplaces

There are no major employers in the Sunday's Well or Blarney Street area.

The region's largest employer is Apple (Holly Hill) and it is clearly intended that the proposed development will be a dormitory residence for Apple employees.

The Apple campus is 2.2Kms from the proposed development at the very top of Holly Hill. Access to the Apple campus from the proposed development will require residents to walk up either Strawberry Hill or Shanakiel Hill both of which have extreme inclines over prolonged distances and have grossly inadequate footpaths. There are no cycle routes and it is highly unlikely that the narrow road network can be upgraded to accommodate any cycle routes in the future.

It should be noted that Apple provides approximately 4700 parking spaces for their 6000 employees having recently added 750 parking spaces to accommodate the 1000 new employees for their recent expansion. A source close to Apple admitted to us that "everybody" drives to work, even those who live within 10 walking minutes. That Apple should have provided such a high ratio of private vehicle parking spaces on site clearly proves that the vast majority of their workforce cannot and will not travel to work on foot, bicycle or by public transport.

Given the distance and severe gradients between the proposed development site and Apple combined with the dismal level of public transport, lack of safe pedestrian walkways and total lack of cycle routes it is undeniable that the vast majority of journeys to and from the proposed development and Apple will continue to require private vehicle transportation.

Likewise, the route to UCC requires pedestrian to cross highly dangerous and congested roads, use severely sub-standard footpaths along routes, especially on the long flight of steps from Sunday's Well Road down to Daly's Bridge and Fitzgerald Park which have no public lighting and are subject to high levels of crime and anti-social behaviour.

To suggest that residents will use this route to access UCC during hours of darkness is a reckless disregard of the personal safety of the students.

In conclusion, we submit that the applicant's claims regarding accessibility to amenities has no basis in reality. The vast majority of all journeys to and from the site will require private vehicle transport. Therefore the applicants estimate of 218 vehicles on the site is hopelessly optimistic. The real figure is likely to be in the region of 400 to 500 private vehicles.

This more honest and realistic figure will cause massive parking over spill onto already congested roads, depriving the existing community of vital on-street parking and causing serious traffic congestion. Managers of businesses in Cork city are already passing on the complaints of their workforces that the problem with Cork isn't the accommodation, it's the ability to get to work. If we want Cork city to develop a vibrant commercial culture, we need to do something to improve access to the city centre from the dormitory suburbs, not to disimprove it.

The applicants assessment of private vehicle journeys, parking requirements and their impact on local traffic is based on profoundly flawed and unrealistic assumptions for pedestrian, cycle and public transport journeys and should be rejected in total.

5. Parking

The planning application and the response to the Request for Information (RFI) do not deal satisfactorily or in any way adequately with the issue of parking for residents of the proposed development and certainly not with the consequential effect on existing residents of Sunday's Well. We are extremely concerned about how this issue is consistently ignored and down-played by the applicants.

The proposed development would exacerbate intolerably the problems already being encountered by existing residents. Parking in the area of Sunday's Well Road is already severely limited with occupancy of parking spaces on most nights at above 90% by people displaying resident's permits. The applicants consistently downplay the reality of the parking problem in Sunday's Well.

The applicant's strategy is (1) to minimise the reality of car ownership rate among the targeted professional population of the proposed development and (2) to disregard the considerations and long-established needs of the existing local resident population. The implantation of a potential residential complex of up to 900 occupants would increase by between 100 and 140% the people living in the area and thereby considerably increase car usage and parking requirements.

Yet the *Cork City Development Plan 2015 – 2021 Vol 3* p. 67 (in the Section on Sunday's Well) identifies and acknowledges the “lack of sufficient on-street parking” and states without obfuscation: “Intensification of vacant sites and under-used sites, for example in Sub-area D, is problematic because of poor access and integration of the sites with the already narrow surrounding road network”. The Good Shepherd site is situated in sub-area D. We find this lack of acknowledgement by the applicants very concerning.

5.1 Parking overspill for residents of the proposed development

The (revised) planning application proposes to provide 218 parking spaces for up to 900 individuals, a paltry increase of 8 spaces compared with the original application. The proposed development is, in effect, identified several times in the Environmental Impact Study (EiAR 2) as a rental village aimed at professionals.

The design of each unit is clearly geared to multi-occupancy tenancies and it is inevitable that such residents of this proposed development will have several cars per unit. The scenario presented by the applicant in paragraph 8.7 of the EiAR 2 is deliberately misleading and disingenuous. This development will manifestly require considerably more parking space than is proposed and cars will spill over on to public street parking spaces which are already at a premium. It is inevitable that the number of parking spaces proposed is grossly inadequate for a population of this type and a development of this size, even if the people living there chose to walk or cycle to work: where would they leave their cars?

Moreover, it is considerably less than the maximum allowable specified in the Cork City Development Plan 2015-2021 (specifically Table 16.8), which the applicant acknowledges and refers to but does not take note of. The applicant excludes the needs of visitors, delivery or service vehicle parking requirements. The thoroughly inadequate parking provisions of this planned development will result in a massive increase of overspill vehicles seeking road side parking throughout the area .

Part G of the Cork City Development Plan 2015-2021, Table 16.8 indicates the following:

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

The proposed number of 1 and 2 bedroomed units is 135 and proposed number of 3 and 3+ bedroomed units/houses is 67. Therefore, by the above official standards, 320 parking spaces are required according to the Cork City Council's own recommendations.

The number of car parking spaces the applicants have planned (218) falls far short – by more than 100 – of this figure. Indeed we contest that the reality is that the vast majority of targeted residents for this development, whether or not they will go to work by car, as professionals, will be car owners, and the official figure of 320 is a very low estimation of the real level of car ownership.

In paragraph 8.4.4 of the EIAR 2 the applicant refers to the above-mentioned Cork City Development Plan 2015 – 2021, stating “ *(the plan) specifies that the maximum parking standards permissible in the city, maximum standards having been specified to constrain car trip generation and promote patronage of “green” modes of transport*” . The applicant is not applying these standards by providing only two-thirds of the allowable parking and therefore actually *encouraging* trip generation because there will be nowhere nearby to put the car during the day. The proposals are therefore are not in keeping with best practice and with the objectives they spuriously claim to promote.

As stated and demonstrated in other sections of this submission the public transport provision in Sunday's Well is totally inadequate or non-existent (see section 7 of this objection), the terrain, topography and road-width render Sunday's Well quite unsuitable for cycling (see section 2.5 of this objection) and public footpath provision is inadequate (see section 2.6 of this objection). Therefore car ownership and use will inevitably be the primary means of transport for the majority of occupants of this proposed development - for work, for shopping in supermarkets and shopping centres, for access to health care and for general leisure activities, especially for returns from town late at night. It is worthy of note that the Cork Taxi Council perhaps a little alarmingly, forecasts that taxi provision in Cork will cease within the next five years (Evening Echo, 21-11-2017, p.5).

The proposed crèche (building B6) – which will serve not only the residents of the proposed development but also the wider public - will generate additional car use in the Convent Avenue area and potential subsequent pressure on car parking space.

5.2 Parking for established local residents of the area

We object vehemently to the real and intolerable threat of increased parking pressure on established local residents engendered by the proposed large-scale development. The impact on the quality of life for the long established community of the additional traffic and on-street parking generated by the proposed development will be devastating. This is not a matter of inconvenience but a direct threat to the health and safety of the entire community.

The lack of private garages and private driveways necessitate on-street parking by most residents of Sunday's Well. The limited public parking space on Convent Avenue, Strawberry Hill and Sunday's Well Road also has to serve the local and passing users of the local services (Post Office, shop, café, pub). Existing residents already encounter significant difficulties securing road side parking on Convent Avenue, Strawberry Hill and Sundays Well Road. The inevitable overflow 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.

For the elderly and families with young children in particular, the denial of parking will have a dire impact on daily life. Due to the lack of public transport, safe footpaths, and other modes of transport it will be impossible for residents to access vital amenities such as shops, medical services, work or schools.

The applicant is 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” (8.3.2.1 Page 108/9, EIAR 2). 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 buses 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 and the forced relocation of more than 30 residents' vehicles to the road outside the Cork City Gaol directly threatens the viability of the single biggest tourist attraction in the city -- which is a long established local business.

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

Section 8.7.3.1 of the EIAR 2 proposes creating a footpath along Convent Avenue between the proposed development and Strawberry Hill (figures 8.5 & 8.6, page 148, also Appendix P). This proposed measure will exacerbate further the parking difficulties and eliminate parking space along the Gaol frontage which contradicts the proposal to use the area for a parking overspill. It will narrow the road by 2 metres, thereby withdrawing or negatively affecting the existing parking space for visitors to this important tourist amenity. The effect of this proposed measure contradicts and negates the applicant’s assertion in Paragraph 8.3.2.1, referred to above.

Section 8.7.3.2 proposes a “rationalisation of on-street parking on the approaches to the junction” (Convent Avenue/Sunday’s Well Road). It is unclear what is intended by this vague statement, but it can only refer to the diminution of on-street parking space for existing residents and temporary parking space for customers of the services (Post Office, shop, café, etc) near this junction, whose businesses will suffer as a consequence of such a measure.

Although the applicants have failed to provide any details of their proposed traffic management plans it seems inevitable that they will also need to eliminate the parking spaces on Sunday’s Well Road on either side of the junction with Convent Avenue in order to facilitate turning space for HGVs. This will severely restrict access to the local post office causing severe hardship, especially for pensioners and threatening the viability of this essential local service and will impact on the availability of parking spaces for inhabitants of the entire Sunday's Well Road. It will also severely impede visitor access to the two new businesses opening on either side of Convent Avenue – Vikki's and Annie's Indian Restaurant.

6. Overlooking and privacy issues

Although overlooking and privacy issues were an important part of our original objection, and were raised by the CCC in their requests for further information, we are disappointed to see that the applicants did not address these issues satisfactorily. We will deal with the northern, eastern, and southern boundaries in turn, although many of the issues are shared between them.

Consideration of these issues must be framed in the context of the *Council's CDP Vol 3, "Sunday's Well - Proposed Architectural Conservation Area - Building typology"*:

The area's buildings range from the large institutional buildings in stone and brick through larger detached houses on their own sites, semi-detached and terraced houses of considerable scale to smaller houses and cottages on lanes and backstreets. Houses are typically constructed of painted plastered rubble-stone or brick walls, several with slate-hanging on exposed southern facades. Where they retain original finishes and features, they have roofs of natural stone slate, robust cast-metal rainwater gutters and downpipes and painted timber doors and windows and many good examples of iron railings and gates. Surviving historic street furniture and paving, such as limestone steps and kerbing, iron handrails and guardrails make a significant contribution to the character of this distinctive area.

The contention in the applicant's response to Council's RFI that the architecture of the proposed developments and the revisions in the response to RFI states- *'The architectural language and proportions are based on the established residential pattern of Sundays Well.'* This is patently absurd, as will be demonstrated below.

Consequently, granting of planning permission for construction as in the proposed development would destroy forever a unique area of architectural significance for the city.

6.1 Northern Boundary

We were concerned that 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.

The CCC wrote in its request for further information:

Blocks A1, A2 and A4: *The Planning Authority is concerned regarding the visual impact of Blocks A1, A2 and A4 in the context of ridge heights of the pitched roofs of the retained buildings. Please address this point including the towering of the height of Blocks A1, A2 and A4 by one floor.*

In response the applicant wrote:

Buildings A1, A2 and A4: *The top floor of Building A1 has been reduced to half its footprint to a fifth storey setback, while maintaining all the Part V housing units in one block. This revision will reduce the impact of the building on the Gaol grounds to the west. It is noted that the rear portion of Building A1 is heavily screened by embankments and existing trees, so no visual impact to the north will arise.*

In addition, the top floor has been removed from the new buildings to the rear of the existing buildings for A2 and A4 in line with the RFI.

In addition, the apartments proposed in lower ground floor of Building A3 have been removed and replaced with storage.

However, as can be seen from the photo-montage below, A1 still dominates the gardens to the north of the boundary wall and so does A2, even without the top floor. A3 (not included) remains the same height, although the lower ground floor is no longer residential.

The proposed development therefore, would still 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.



photo-montage of Block A1 and A2 from back of house

6.2 Eastern Boundary (Buxton / Buckston Hill/ Upper Janemount)

Design/ layout: Blocks B1-B5

The City Council considered that the proposed apartment blocks in the lower section of the site and located close to the south and east boundaries were problematic in terms of impact on the amenity of neighbouring houses and by virtue of their size and bulk, in terms of exiting architectural character of areas immediately adjacent on Buckston Hill and the north side of Sunday's Well Road.

The applicants have totally ignored this request in relation to Block B1 stating that no changes were specifically requested.

The existing properties adjoining the proposed B1 building are all two storeys high and the maximum height in the area is 3 storeys. There is very little gradient on this part of the site therefore the proposed 5 storey structure at B1 will dominate the landscape and result in substantial overshadowing of the properties at No 5, 6, 11, and Meelmane. It will block light from the west and the south. The applicants maintain that any impact that might have occurred has been mitigated by the reduction in height of the Blocks on the Buckston Hill boundary. *There has been no reduction in height of Block B1 on the Buckston Hill boundary.*

Updated Visual Assessment

The applicants were requested to supply a view from Buckston Hill looking west to the site approx. 50m back from the emergency entrance. They refer to EIAR and specifically Chapter 7. Views supplied before and after supposedly from Buckston Hill (Appendix D View 1) are in fact from Upper Janemount.

The view of the site looking westward from 50m east of the Emergency entrance (Appendix D View 6) is incorrect when compared with Figure 4.3 Site Layout for the Proposed development.

The building shown in line with numbers 5 & 6 and Meelmane Buckston Hill is neither A5 nor B1. A5 lies behind the houses at No 5 & No 6 Buckston Hill and is in line with A4 as confirmed by the applicants themselves at 4.4.2.1. Therefore it cannot be in line with the existing houses. A4 which is one of the existing Good Shepherd buildings is in line with the rear gardens of No 5, No 6 and Meelmane. This is a misrepresentation of the location of A5. A5 being in line with A4 will most definitely overlook the rear of the aforementioned residences on Buckston Hill.

Building B1 was omitted from the initial EIAR and again is being ignored in the updated version. There is no trace of it in the after view Appendix D View 6 unless it is meant to be the one shown in line with the existing properties if that is not A5.

The Site Layout Figure 4.3 (see below) shows B1 will lie to the front of these properties and will stand at 5 storeys high in a position of dominance and totally at variance with the character and architecture of the nearby buildings on Buckston Hill.

There has been a failure to give a true Environmental Impact Assessment on the Eastern Boundary and the request for information has been largely ignored on these substantive points.



Site Layout figure 4.3

6.3 Southern Boundary (Sunday's Well Road, Buxton Terrace, Lee View Place)

The commentary in this section, while related specifically to the southern boundary, has significance also for the architectural characteristic of the entire proposed development.



Plan showing location of buildings B1 – B5 (not to scale).

RFI Item -Design/layout

Council RFI states: Blocks B1-B5: it is considered that the proposed apartment blocks in the lower section of the site and located close to the south and east boundaries of the site are problematic in terms of impact on the amenity of neighbouring houses and, by virtue of their size and bulk, in terms of the existing architectural character or areas immediately adjacent on Buxton Hill and the north side of Sunday's Well Road.

- It is considered that given the negative impact on adjacent property and the problematic setting of Blocks B2, 3, 4 and 5, and the transport constraints (identified above) the strategy for this part of the site should be revised, replacing the apartment blocks with own-door houses with gardens, thereby contributing to the integration of the site with the family-type housing of Buxton Hill and Sunday's Well.
- The extent of hard-landscaped surface car parking in this area should be reduced.

EIAR2 Response - Buildings B1-B5: Almost a third of units proposed for the southern section of the site are now houses. In addition, of the 48no. apartments proposed in Buildings B1-B5, 14no. almost a third, are now 3-bed duplexes.

Specifically, Buildings B2 and B5 are now proposed as own-door 3-storey terraced houses with the top storey significantly set back along the south elevation. All shared amenities areas for these units have been converted to private garden space. The architectural language and proportions are based on the established residential pattern of Sundays Well.

No changes are proposed to Building B1 as no changes were specifically requested.

Comments:

It is noted that less than one-third of the units are proposed as houses. This falls unacceptably short of Council's requirements.

B1 - As stated, no changes are proposed for building B1. B1 is located in close proximity to the southern boundary and , so, overlooks and dominates the properties on Sundays Well road contiguous to this section of the site's southern boundary. The structure of the block is completely at variance with the architectural character of existing properties in the area.

B2, B5 - Integration of B2 and B5 '*with the family-type housing of Buxton Hill and Sunday's Well.*' as required by the Council is clearly not achieved by the proposed 3-storey structures.

These buildings do not, in any sense, conform with the Council's Sundays Well ACA as quoted above, are constructed of materials and have roofscapes completely at variance with the architecture extant in the surrounding area.

These buildings have not been set further back from the boundary, as Council required. The, minimal setting back of storey three, as proposed, does not, in any way, meet this requirement. The B blocks are set approximately 10 metres from the southern boundary wall running the whole length of the development overlooking the homes of residents along this perimeter. The gardens at the rear of the properties on Buxton Terrace are approximately 30 metres in length. The three storey B block will dominate and severely impact on the privacy and security of these properties. This overlooking aspect and the consequent invasion of privacy and security risks are further exacerbated by the fact that ground level in the GSC is approximately 5 metres above the ground level of the homes along Buxton Terrace

RFI Item Materials: *The applicant is requested to reconsider the self-colour render finish to the northern elevations of Blocks A1- A5 and to the elevations of Blocks B1-B5. The Planning Authority has concerns in relation to the visual impact of this finish on views towards the site and in terms of long term weathering.*

EIAR2 Response: *Some rendered facades (predominantly south facing) have been retained in the housing and lower buildings (B1-B5) as it is considered that this ties in well with the language of Sundays Well.*

Comments:

Drawings relating to B2 are, in fact, incomplete as items in the legend are not identified on the drawing.

The materials proposed are wholly inappropriate and entirely at variance with what would be permitted on properties on Buxton Terrace and elsewhere along Sundays Well Road.

We note that there is no visual impact assessment in Section 7, Table 7.5 for the Sunday's Well Road houses. Blocks B5 and B2 will have a "Permanent", "Negative" type of impact, and whereas the Blarney Street area is designated to have "Significant" impact (but see the picture of the projected view at the start of this section) on the southern boundary, since B5 and B2 will be 54m high and situated above the existing dwellings (ground level of these blocks is at the level of the first floor windows in Sundays Well houses), one can only conclude they will have a "Profound" impact. The lack of pictures in Chapter 6 from homes on the southern boundary underscores this weakness of the proposal. Residents in the Blarney Street area would dispute that the impact on their homes is merely "significant" and would argue strongly that this categorisation should be changed in their case to "Profound" as well.

The issue of concern with regard to visual amenity has therefore not been addressed and this is a substantive lack in this application. However, the more substantive issues of loss of privacy and security for all the residents also remain in force.

Boundary Walls

The southern boundary wall is in excess of 150 years old, limestone in some places and red brick in others. As stated above, rear gardens of properties on the southern boundary (specifically those of Buxton Terrace) are approximately 5 metres below ground level of the GSC site. Ground and construction work, as proposed, present a real and serious risk to the boundary wall. No reference is made by the applicant to these matters and no mitigation is proposed.

Damage to the wall, which, in effect, is a retaining structure, would have catastrophic effects on these properties, especially on those situated within a few metres of the wall, and would pose serious risks for the health and safety of residents as well as further endangering the privacy and security of the existing houses south of it.

7. Public Transport

In the Background section of the Planning Application (2.3 Site Selection) the applicant states that the proposed development site has “good public transport to the city centre and the southern side of Cork City.” This is not a true statement of the state of affairs and in fact is highly misleading: there are in fact *no* public transport connections between Sunday’s Well and the City Centre and *no* public transport links to the south side of Cork City.

There is one bus route that passes through the western section of Sunday’s Well Road. The 201 is an orbital route which runs from the CIT on the western suburbs and out around the northern most edge of the city. It runs 7 services on weekdays and no services at weekends or public holidays. In practice this is a ghost service which is almost permanently empty as it provides no useful connections to distant amenities for the vast majority of the existing residents of Sunday’s Well and surrounding communities. In practice, because of the poor uptake of this service, it is unremarked that it sometimes does not run.

For the very few locals who use this service, access to the only local bus stop requires crossing the exceptionally dangerous junction of Shanakiel Road and Sunday’s Well Road. The applicant's proposal to create an ‘Improved pedestrian crossing at the junction of Sunday’s Well Road and Shanakiel Road’ as set out in 8.7.3.3 refers to an informal crossing which, given the massive congestion already experienced at this 140 degree hairpin corner will be of no practical improvement to local pedestrians.

Moreover, the extension of the footpath on the south east corner of this junction will almost certainly prevent the bus from being able to make this turn.

The photo below was taken at the height of rush hour (8.34 am) on Monday 20/11/17. It clearly shows an almost entirely empty bus attempting to turn the hairpin corner at the junction of Sunday’s Well Road and Shanakiel Road.

The road at this junction is entirely unfit for buses or HGVs and the photo clearly shows that the bus must cross into the oncoming lane, entirely blocking it in order to eventually crawl around the bend.



The applicant also suggests that residents will be able to use the bus routes on the Western Road. To access these buses requires ten minute walk along totally inadequate footpaths, down a long flight of steps, across the narrow “shaky Bridge” and along the edge of Fitzgerald Park. This area has no public lighting and is subject to high levels of crime and anti-social behaviour making it dangerous especially during the hours of darkness.

This route is entirely inaccessible to wheelchairs users and poses serious risks and obstacles to prams and buggies. It is far in excess of 600m which is considered a reasonable walking distance to local transport.

8. Geological Survey

The sections 14.3.1 – 14.3.4 dealing with the geology of the site is based heavily on 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 EIAR or EIAR 2 for this development.

On p. 262 of the EIAR 2 quoting work 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 p. 263 in EIAR 2, 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 applicants must undertake to complete a Geological Survey of the whole site to ascertain if the site can withstand anticipated building disturbance. In the absence of such data, we must fall back on authenticated records from the local area relating to geological problems.

As stated, in our original objection, houses at the southern boundary of the site have been subject to occasional inundation by water from the Good Shepherd Convent (GSC) site.

The damage and costs accruing have been substantial. 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 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, all houses and gardens in this area have encountered damp problems. Section 14.3 of the application also presents this information but in a confused way. Section 14.3.3 confuses "surface water" with "flooding" and notes that "there are no existing outfalls connecting the site to the River Lee" which may indeed be correct. The outfalls are to the north of the Sunday's Well Road. Although it is equally correct to say that the GSC area is in no immediate danger of flooding from the River Lee basin (unless a catastrophic tidal event occurs which will wipe out most of Cork city to the airport on the other side!) the Annual Environmental Report of an Uisce, 2015, reports that Eikpa Lodge & Hazelhurst in Sunday's Well have on record incidents of "highly significant storm overflows" the most alarming classification that the report gives (www.epa.ie/licences/ p. 16 table 4.1.1).

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. The increased run-off caused by such a large scale development and the disruption of natural springs may significantly increase the

flow of water 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 Sunday's Well Road itself may be vulnerable to displacement through flood water from the aquifers and that would indeed present Cork city with a headache that might last for many months (cf the rock fall at Carrigrohane due to flooding which was not cleared up for over 18 months due to legal liability problems).

Consequently, any development of the site should be preceded by a comprehensive geological survey of the site, designed specifically to identify the existing water sources and to ensure that they are contained and not amplified by the development work. We stated this in our first objection letter but it is completely ignored in the revised EIAR 2. No convincing evidence has been adduced to confirm that the above issues have been investigated. Consequently, no assurances have been given that further difficulties will not be generated by the development and no remedial actions have been proposed should such difficulties occur.

The consequences of failure, at the planning stage, to anticipate and plan for the potential for water damage arising from housing development and the substantial associated costs have been well documented over recent years. Previous geological work on the site has confirmed the existence of multiple water flows through the site. The extent of the groundworks and hard surfacing in the proposed development will severely restrict the process of water dispersal in the site. In view of the potential damage to properties at and below the southern boundary of the site, planning should not be given and no development nor preparatory work should commence before a substantial bond is lodged by the applicant. The amount of this bond is difficult to calculate, but a figure in the region of 10 -15 million euro would seem appropriate, given the high value of the properties to the south.

9. Financial Bonds

Three kinds of financial assurances are required of the applicants:

1. Approval should not be granted without insisting that the applicants 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 applicants 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.

9.1 Requirement for a Completion Bond

It appears that Moneda Development lacks experience or a track record in delivering projects on this scale. We are mindful locally of the failure to fully develop Our Lady's Hospital on the Lee Road, and nationally of the example of Priory Hall and the legacy of ghost estates. We would therefore 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. See Section 3 of this objection for likely problems with construction traffic flow which the applicants ignore.

9.2 Construction Insurance

We 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 suggest that the overall coverage should be calculated at a sum €500,000 for each surrounding property. See for instance problems with the southern boundary wall in section 6 of this objection.

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

9.3 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. See Section 8 of this objection for likely problems stemming from inadequate geological survey.

10. Archaeological Issues

The City council requested that research would be carried out on the records of the residents of the institution, numbers of recorded deaths and burials and an assessment of the likely occurrence of undocumented burials of children.

The applicants did not comply with this request on the basis it was not relevant to the planning and development of the site having regard to the result of the geophysical survey and subsequent test trenching.

A geophysical survey was carried out but it would appear the geophysical survey did not cover the entire site. Local knowledge and history would indicate that other areas of the site should be subject to geophysical survey most particularly the area noted as "Areas 5& 6" in Figure 6 Chapter 12 of the EIAR.

The reason given for not surveying Area 5 was that they do not intend any development there.

Observers to the trench testing were concerned at the size of the bucket being used for what is a sensitive site.

The applicant wrote in their summary response to further information on the 16th October:

A geophysical survey (Detection licence ref. 17R0115) and a programme of archaeological test trenching (Licence no. 17EO460) has revealed that no artefacts, features, deposits or remains of archaeological or cultural significance are identified within the proposed development site.

However, on being asked about some objects seen and photographed lying around the site, Joanne Hughes of the city council wrote to a member of the committee on 9th October:

The archaeologists have recovered [three finial / architectural elements] and grouped them together where you have observed them on the site for their future re-incorporation in the buildings should planning be granted for the proposed development.

It would appear that the response for further information did not reflect the true state of affairs with regard to elements of cultural significance and we voice our disquiet about the other assertions of this nature given in the response by the applicant.

Given this sensitivity it is imperative that the applicant should comply with the first request of the City Council to research the records of the former institution and also extend the geophysical survey to the entire site.

11. Architecture

We have carefully studied the response by Moneda Developments to the request by Cork City Council Planning Department for further information in relation to the proposed development of the Former Good Shepherd Convent site in Sunday's Well. It is an unacceptable response to inadequate questions from Cork City Council and should be rejected by the Planning Department. Moneda Developments have failed to address the concerns of local residents, and they continue to contravene significant articles of the Cork City Development Plan 2015-2021.

We are particularly distressed to read in the revised EIAR, Issue 2, of building A2 page 250 and building A4 page 252, that the applicants still propose changing the roofs of the original Victorian buildings by the introduction of "a continuous south facing dormer window to the front ridge of the roof", of which they say, "while it will have a visual impact, it will not negatively affect the special character of the building". This is completely unacceptable and in contravention of Chapter 9 of the Cork City Development Plan 2015-2021, and may contravene current legislation, quoted on page 230 of the EIAR 2:

Under current legislation (Part IV of the Planning and Development Act 2000) all extant structures (and parts of the structure), the interior of the structures, any structures lying within the curtilage of the structures and their interiors, and all fixtures and features which form part of the interior or exterior of the structures included within the site boundaries of the former Good Shepherd Convent are afforded protection by its inclusion on the Record of Protected Structures.

In our opinion, the planning application is in contravention of Article 16.46 of the Cork City Development Plan 2015-2021. 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. The request by Cork City Council, RFI Item No 5, and agreed by Moneda, for green sedum on the flat roofs on Blocks A1-A5, does not address our objection.

12. 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.

12.1 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.

12.2 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 applicants. 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.

12.3 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 applicants have not given this due consideration.

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 a ghetto-like area. 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.

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.

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.

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.