

Validation Checklist

Lodgement Number : **LDG-081568-25**

Case Number: **ACP-323082-25**

Customer: **Martin Krasa**

Lodgement Date: **21/07/2025 15:08:00**

Validation Officer: **Karen Byrne**

PA Name: **Cork City Council**

PA Reg Ref: **2543847**

Case Type: **Appeal - LRD**

Lodgement Type: **Appeal - LRD**



An
Coimisiún
Pleanála

Validation Checklist	Value
Confirm Classification	Confirmed - Correct
Confirm ABP Case Link	Confirmed-Correct
Fee/Payment	Valid – Correct
Name and Address available	Yes
Agent Name and Address available (if engaged)	Not Applicable
Subject Matter available	Yes
Grounds	Yes
Sufficient Fee Received	Yes
Received On time	Yes
3rd Party Acknowledgement	Yes
Eligible to make lodgement	Yes
Completeness Check of Documentation	Yes
Valid Lodgement Channel	Yes

LRD - Multiple appeal

3rd V Grant

To: AA

Please issue the following letter:

LRD01M to appellant and enclose a copy of the receipt and other relevant appeals.

Please keep a copy of letter for file.

Update case narrative.

Run at: 22/07/2025 14:40

Run by: Karen Byrne

Lodgement Cover Sheet - LDG-081568-25

Details ACR-323082-25

Lodgement Date	21/07/2025
Customer	Martin Krasa
Lodgement Channel	In Person
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

Categorisation

Lodgement Type	Appeal
Section	Processing

Fee and Payments

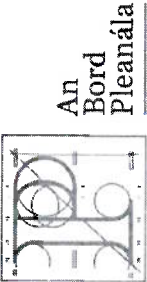
Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Paid	220.00
Refund Amount	

Appeal Decision date: 23/06/25

LD appeal: 21/07/25

multiple

3rd V Grant



Lodgement ID	LDG-081568-25
Map ID	
Created By	Shirley Connolly
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	

25/63847

PA Name	Cork City Council
Case Type (3rd Level Category)	

DD

Observation/Objection Allowed?	
Payment	PMT-064038-25
Related Payment Details Record	PD-063877-25

LRDM

PA Case Details Manual	
PA Case Number	
PA Decision	
PA Decision Date	
Lodgement Deadline	
Development Description	
Development Address	

Appeals Type	
--------------	--

Martin Krasa
Buxton Villa
107 Sunday's Well Road
Cork
T23 X5A4

AN COIMISIÚN PLEANÁLA
LDG- 081568-2S
ACP- _____
21 JUL 2025
Fee: € 220 Type: CARD
Time: 14-58 By: MAKP

To:

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1,
D01 V902

21st July 2025

Re: Appeal against planning permission granted by Cork City Council for development of 957 student beds at the Former Good Shepherd Convent, Convent Avenue and Buckston Hill, Sunday's Well, Cork

Cork City Council Planning Reference Number: 25/43847

Planning Applicant: Bellmount Good Shepherd Ltd.

To Whom It May Concern,

I am writing to appeal formally the decision by Cork City Council to grant planning permission for the above-referenced development at the Good Shepherd Convent site, a location of profound historical, cultural, and social significance in Cork City.

I reiterate the views expressed in my submission to Cork City Council, which I attach herewith, in response to the above Planning Application. I consider that objections I raised have not received due and proper consideration.

My objections are well grounded and are informed by my in-depth knowledge of Sunday's Well, where I have lived for over forty years in close proximity to the Good Shepherd site, and where I avail of the local infrastructure regularly, both as a pedestrian and as a car driver. I also have recourse to using taxis because there are no viable public transport facilities which serve the area.

In my appeal to An Coimisiún Pleanála, I wish mainly to highlight the following points in the light of my objections raised to Cork City Council and of its decision to approve the planning application:

- The misleading use of census data to justify the scale and appropriateness of the proposed student accommodation development

- The disproportionate impact of a 957-bed residential enclave in the long-established residential area of Sunday's Well
- The lack of public consultation and community engagement in the planning process
- The apparent imbalance in the planning assessment in favour of the applicant
- The complete unsuitability of Buxton Hill as an access point to the Good Shepherd site
- The Infrastructural deficit in Sunday's Well, in the vicinity of the Good Shepherd site

1 Misuse of Census statistics

The planning application makes repeated reference to population and student density figures derived from broad electoral areas extending far beyond Sunday's Well. The "study area", shown in Chapter 4 of the EIAR paragraph 4.5.7 comprises multiple electoral areas north and south of the river Lee which total a population of 21,039. These areas encompass residents across diverse neighbourhoods, far beyond UCC to the south through areas of diverse populations to the south, east and west of the site, and do not reflect the specific characteristics of the Good Shepherd site, which lies within a much smaller and more vulnerable residential area. r/k

1. By using such aggregated data, **the application masks the true demographic and infrastructural impact** of placing circa 1000 students in a small enclave with a 2022 census population of only 266 people (CSO Small Area Code: A048059002). This would represent almost a quadrupling of the local population (c. 360 % increase), an unprecedented change in scale and character that is not evident when viewed through the lens of citywide data. Even adding three adjoining Census "small areas", the population total is 966, thus representing a population increase of c. 100%.

2. Lack of justification for Study Area selection

The applicant has not provided a clear or transparent rationale for the selection of the "study area" used to assess demand, demographics, or context. The chosen area appears to be arbitrarily defined and does not reflect the immediate vicinity of the development site, which is characterised by narrow streets, heritage properties, and a small, stable residential population. Despite this, the planning authority appears to have accepted the study area without question, and further supported its validity by stating that the resulting population increase of the "study area" of 4.5% is insignificant for planning purposes. This approach overlooks the fact that such a percentage, when applied to a broadly defined and urbanised area, fails to capture the disproportionate local impact on the much smaller, directly affected community. **It is inconsistent with planning principles of proportionality, local context sensitivity, and cumulative impact assessment.**

3. Inappropriate statistical framing

The use of such broad datasets creates a false impression that:

- The area is already a hub for student accommodation;
- There is sufficient infrastructure in place;
- The proposal is in keeping with the existing population profile.

None of these conclusions hold true when one examines the small area in question. In fact, Sunday's Well is a settled residential neighbourhood with limited access, constrained road capacity, and minimal public transport. These local realities are completely overlooked when analysis is based on large-scale census tracts.

4. Conflict with Development principles

Cork City Development Plan 2022–2028 promotes development that is:

- Proportionate to its setting;
- Respectful of local character;
- Supportive of balanced communities.

The misuse of data to obscure the real demographic and infrastructural context of the area is contrary to these principles and would set a dangerous precedent in allowing large-scale institutional accommodation in low-density, residential areas under a veil of statistical justification.

I respectfully urge An Coimisiún Pleanála to reject **this planning application on the basis that its justification is built on a methodologically unsound and misleading interpretation of census data.** A development of this scale must be assessed using local small-area statistics that reflect the immediate community and its capacity to absorb such change. Anything less undermines the integrity of the planning process and the principles of evidence-based decision-making.

2. Disproportionate impact of a 957-bed student development on a small residential population of 266

1. The scale of the development is radically disproportionate

The proposed development includes 957 student beds — meaning that, if approved, it would introduce 3.6 times more new residents than currently live in the area. This is not a minor increase — it would instantly and dramatically transform the demographic balance of the neighbourhood.

This scale of intervention is unprecedented and deeply incompatible with the planning principle of proportionate, context-sensitive development. It would create a student-dominated enclave within what is currently a settled, long-established, low-density residential area.

This site would no longer be integrated into the neighbourhood — it would function as a standalone, self-contained campus, disconnected from the surrounding community and dominating the area in scale and population.

2. Violation of core planning principles

Both national planning guidelines and Cork City Development Plan policies support the goal of:

- Creating sustainable, mixed, and balanced communities;
- Avoiding overconcentration of transient populations (e.g., students or tourists);
- Promoting developments that integrate with, rather than overwhelm, existing neighbourhoods.

By increasing the population of the small area from 266 to over 1,200 (including students), the proposed scheme would eliminate any demographic balance. It would create a monoculture of temporary, high-turnover occupation, in direct opposition to these policy goals.

Such an extreme shift is not sustainable — either socially, infrastructurally, or in terms of neighbourhood stability.

3. The development is institutional in scale, not residential

By proposing 957 beds in a concentrated block, the development is effectively creating an institutional residential complex, more akin to a university campus than a typical housing scheme. This is fundamentally at odds with:

- The scale of existing buildings;
- The historic, residential character of Sunday's Well;
- The infrastructure (roads, footpaths, emergency access, services) in the area.

The mismatch between the proposed density and the small local population should alone be grounds for refusal.

A development of 957 student beds in a small area with a population of just 266 residents is wholly disproportionate. It would radically and permanently alter the character, balance, and livability of the neighbourhood.

I request An Coimisiún Pleanála to consider the actual local context, not abstract or inflated averages. A development of this scale, in this location, cannot be justified on planning, social, or infrastructural grounds, and should be refused accordingly.

3. Buckston Hill Is Completely Unsuitable as an Access Point

(PP 4-8)

a. Resident's direct experience

I am a long-term resident whose driveway exits directly onto Buckston Hill, also known as Buxton Hill. I use the road daily and am acutely aware of its severe limitations and inherent risks. My observations are based on direct, continuous experience.

a. Inappropriate and dangerous use of Buxton Hill access

A serious concern arises from the approved use of the Buxton Hill entrance as an access point to the development. This decision, supported in the Cork City Planners' report, is neither viable nor safe.

Buxton Hill is a steep, narrow lane with extremely limited width, poor sightlines, and inadequate pedestrian infrastructure. It was never intended to accommodate significant traffic, and certainly not the scale of vehicle, bicycle, and pedestrian movements generated by a development housing nearly 1,000 students / holiday-season tourists. This cul de sac, incorporating Lower Janemount, serves approximately 35 households

Specific concerns include:

- Safety risk to pedestrians, particularly children and elderly residents, as there is no footpath provision and poor lighting
- Impracticality for emergency and service vehicles, which would face severe access limitations
- Unsuitability for two-way traffic, causing congestion and increased risk of collisions

- Noise and disruption to adjacent homes, due to the funneling of large volumes of movement through a tight residential area
- The use of Buxton Hill as an access point is wholly incompatible with the realities of the site's geography and fails to meet minimum standards for safe and accessible movement routes.

The choice to approve this access also appears to contradict key principles of Transport and Mobility Objectives in the Cork City Development Plan, which stress the importance of safe, accessible, and context-appropriate access routes in all developments.

b. Physical and Safety constraints

- No pedestrian footpath exists — pedestrians must walk directly on the road.
- The road is steep, narrow, and only allows for single-lane traffic.
- It is bounded by high old stone walls, leaving no scope for widening or footpath addition.
- Private driveways and a narrow laneway – used by five households – open directly onto the carriageway.
- There is a blind corner at the laneway intersection.
- The road is a cul-de-sac, with no through-access or turning space for larger vehicles.

Buxton Hill is entirely unsuitable for use by hundreds of daily pedestrians/cyclists/e-bikes/e-scooters and continuous vehicular traffic associated with institutional housing and tourist use.

c. Dangerous junction with Sunday's Well Road

At the base of Buxton Hill is a blind and dangerous junction with the busy Sunday's Well Road, which:

- Has high stone boundary walls and a protruding former shop obstructing visibility;
- Sits on a slope, making vehicle control more difficult;
- Experiences regular traffic flow, with limited room for turning in or out safely;
- Offers no traffic signals or calming measures, despite poor sightlines.

This junction is already hazardous for residents. Introducing significant additional traffic volumes — taxis, delivery vans, tourist coaches, etc. — would substantially increase the risk of accidents. The junction's configuration makes it inherently unsafe for intensified use.

d. Inadequate emergency vehicle access

Buxton Hill's physical layout makes it extremely difficult, if not impossible, for emergency vehicles to:

- Enter and manoeuvre safely;
- Pass other vehicles;
- Turn around or reverse out in the absence of a turning bay.

For a development of this size — housing circa 1,000 people — this constitutes an unacceptable safety risk. Emergency access must be guaranteed and unobstructed, which Buxton Hill cannot offer.

e. A dangerous and irresponsible Planning Condition

In the Cork City Council Executive Planner's Report, the Executive Planner explicitly supports the use of Buxton Hill for both:

- Construction-phase pedestrian and cycle access, and
- Permanent pedestrian/cycle access to the completed development.

Specifically, the Executive Planner notes in her report:

"The pedestrian/cycle access onto Buxton Hill be required to facilitate phased construction."
(paragraph 14.2 p49)

"The proposed pedestrian access on to Buxton Hill is supported, and a condition requiring its inclusion in the scheme is set out." (paragraph 14.7, p55)

This access point is being made a condition of the permission, despite the fact that:

Buxton Hill is entirely unsuitable for construction or pedestrian access

- It is a very narrow, steep, one-lane cul-de-sac;
- There are no footpaths;
- It has blind bends and extremely limited visibility;
- It serves multiple private residences, driveways, and a laneway with no segregation from vehicular use;
- The junction with Sunday's Well Road is blind and hazardous;
- It is entirely non-compliant with DMURS and basic safety principles.

To encourage or enforce this as a pedestrian and cyclist access point for hundreds of students, and as a construction access route, is reckless and endangers both residents and future users.

b. Phased construction over 7 Years = prolonged disruption

Planning permission has been granted for a 7-year period, meaning Buxton Hill will be subjected to prolonged disruption, including:

- Heavy use by construction workers accessing on foot or bike;
- Noise, dust, and traffic hazards over a multi-year period;
- Long-term erosion of safety, amenity, and accessibility for existing residents.

This is a grossly unfair imposition on a residential cul-de-sac with limited capacity and no tolerance for such disruption.

c. The only other entrance — on **Convent Avenue** — is assumed to carry the primary construction and vehicular load. But no realistic, safe access plan has been proposed for the full operational needs of the site, including:

- Emergency vehicle access;
- Delivery logistics;
- Overflow pedestrian movement.

Instead, the planners have offloaded pedestrian/cyclist pressure onto Buxton Hill, in a decision that prioritises the development's convenience over local safety and infrastructure limits.

Dangerous and Unmitigated Use of Buxton Hill for Construction and Pedestrian Access

As already stated, the Cork City Council Executive Planner explicitly supports the use of Buxton Hill for:

- **Pedestrian and cycle access during the 7-year construction phase, and**
- **Permanent pedestrian and cycle access to the completed development.**

This is reflected in the Planner's Report, which states:

"The pedestrian/cycle access onto Buxton Hill be required to facilitate phased construction."
(paragraph 14.2 p49)

"The proposed pedestrian access on to Buxton Hill is supported, and a condition requiring its inclusion in the scheme is set out." (paragraph 14.7, p55)

However, this mandated access route presents serious, unmitigated safety risks and was approved without any corresponding mitigation measures, either proposed by the applicant or required by the planning authority.

a. No safety improvements or modifications are proposed

Despite the fact that:

- Buxton Hill is a steep, narrow, one-lane cul-de-sac;
- There is no footpath infrastructure;
- The road is bounded by high stone walls and includes blind turns;
- The lower junction with Sunday's Well Road is notoriously dangerous and has poor visibility;

No physical works or safety improvements have been proposed to upgrade Buxton Hill for:

- Safe use by construction workers on foot or bicycle;
- Long-term use by hundreds of students and tourists;
- Coexistence with residents' vehicles, driveways, and daily use.

There has been no proposal to widen the road, install footpaths, improve lighting, manage junction sightlines, or implement traffic calming or pedestrian priority measures.

b. The Planning Authority imposed access — yet ignored mitigation

It is particularly alarming that the planning authority itself imposed the Buxton Hill access as a condition of the development — and yet failed to assess or require any mitigation for its use.

This constitutes a serious lapse in planning responsibility. It contradicts the principles of:

- DMURS (Design Manual for Urban Roads and Streets), which calls for safe, inclusive, pedestrian-first infrastructure;
- Proper planning and sustainable development, which require impacts to be identified and mitigated at source.

c. Prolonged exposure to risk and disruption

The development is granted a seven-year permission period, meaning Buxton Hill will be exposed to:

- Ongoing safety hazards for pedestrians and residents;
- Cumulative disruption from construction-related movements;
- Lasting degradation of local amenity in the absence of infrastructure investment.
- This is negligent and indefensible in planning terms.

Mandating access through Buxton Hill without any corresponding safety works or mitigation is a failure of basic planning standards. It puts residents and future occupants at risk and violates the principle that infrastructure must be fit for purpose before intensified use is permitted.

An Bord Pleanála is respectfully urged to reject the use of Buxton Hill as a site access.

By imposing Buxton Hill as a required access route to the development site, Cork City Council has knowingly overridden basic safety standards, DMURS principles, and the lived reality of local residents. This access condition should be rejected as:

- Unsafe;
- Unfeasible;
- Grossly disproportionate to the scale of the road and its setting.

The use of Buxton Hill for construction and long-term pedestrian/cycle access is further proof that the site is fundamentally unsuited to this scale and type of development.

4. Seasonal Use for Tourist and Visitor Accommodation Raises Additional Planning Concerns

The planning documentation indicates that the development will be used for short-term visitor and tourist accommodation during academic holiday periods. This effectively converts the site into a high-turnover, year-round transient accommodation facility — a substantial intensification of use beyond student housing alone.

This raises several issues:

- The introduction of short-term visitors and tourists, likely to include individuals or groups travelling by car, will place **even greater pressure on local roads and parking capacity** in a neighbourhood that is already poorly served in terms of vehicular access.
- Unlike students who may use public transport or active modes (walking/cycling), **short-term tourists often rely on car hire or taxis — generating more frequent traffic movements on a topographically constrained and residentially sensitive street network.**
- **The character and rhythm of a residential neighbourhood like Sunday's Well is incompatible with a development that shifts every few days from one set of occupants to another, particularly where the site is already significantly increasing local population density.**

Importantly, no detailed assessment appears to have been undertaken regarding the impact of this non-student, seasonal use on transport, noise levels or disruption in Sunday's Well nor on community cohesion.

5. Infrastructure Deficit and Non-Compliance with DMURS Standards on Sunday's Well Road

The proposed development of approximately **957 student and tourist beds** at the Good Shepherd Convent site is inappropriate for the area due to the **inadequacy of local road and transport infrastructure**, particularly **Sunday's Well Road**. This route, which serves as the primary pedestrian and vehicular access corridor to the site, is **non-compliant with DMURS (Design Manual for Urban Roads and Streets)** and cannot safely accommodate the increased volume of residents, tourists, visitors, and service vehicles the development would generate.

The area is already under significant infrastructural strain. Sunday's Well suffers from:

- Extremely narrow roads and footpaths, unsuitable for high levels of pedestrian or vehicular traffic
- Limited public transport access, with no direct high-frequency bus links to major third-level institutions
- Restricted access for emergency vehicles, deliveries, and services due to the constrained road network
- Insufficient amenities to serve the needs of nearly 1,000 additional residents/tourists
- No realistic and adequate mitigation measures have been proposed in the application to address these existing infrastructural limitations.

1. Existing Non-Compliance with DMURS

From **Buxton Hill to Daly's Bridge**, Sunday's Well Road exhibits multiple violations of DMURS principles:

- **Substandard footpath widths**, frequently under 1.2m, well below the DMURS minimum of 1.8m for two-way pedestrian movement.
- **Steep gradients and sharp bends**, reducing sightlines and further constraining pedestrian and micro-mobility safety.
- **Absence of cycling infrastructure**, leaving cyclists and e-scooter users exposed to vehicular traffic on a narrow carriageway.
- **No buffer zones** between footpaths and traffic lanes, increasing the danger for all users.

These deficiencies already compromise safety and accessibility for existing residents, especially vulnerable groups (children, elderly, disabled persons).

2. Impact of the Proposed Development

The proposed population of 957 residents, mainly students and short-term tourists, would dramatically increase the number of:

- **Pedestrians** (commuting to UCC and the city centre),
- **Cyclists and e-scooter users** (on an already unsuitable roadway),
- **Service vehicles**, taxis, deliveries, and potentially private cars.

This intensification would:

- Overwhelm footpaths at peak hours,

- Create significant **pedestrian-vehicle conflict**,
- Increase the **risk of accidents**, especially given the lack of visibility and separation,
- Cause further **exclusion of vulnerable residents** due to fear or inability to safely navigate the area.

3. Breach of National and Local Planning Policies

The development, as proposed, fails to comply with:

DMURS – Design Manual for Urban Roads and Streets

- Section 1.2: Streets must prioritise “vulnerable road users”.
- Section 3.2.3: Footpaths should be a **minimum of 1.8m wide**.
- Section 3.4: Development should be scaled in accordance with the “capacity of the existing network”.

Cork City Development Plan 2022–2028

- Objective 10.2: Promote **walkable, safe, and inclusive neighbourhoods**.
- Objective 11.11: Ensure development does not generate traffic beyond what the infrastructure can safely handle.
- Objective 10.10: Develop streets that are “accessible, legible, and universally usable”.

National Planning Framework (NPF) and NTA Guidance

- Encourage development that supports **sustainable transport**, not that which **overburdens or contradicts** existing pedestrian and cycling capacity.

This proposal is in direct contradiction to these policies and fails to meet even baseline standards for sustainable development.

4. Absence of Adequate Mitigation Measures

The developer has **proposed only minimal infrastructure upgrades / mitigation** measures, in respect of:

- Footpath widening,
- Traffic calming,
- Provision of segregated cycling or scooter lanes,
- Improvements to pedestrian crossings or visibility,
- Drop-off/pick-up zones to ease pressure on the street.

In these circumstances, it is not reasonable or responsible to approve a development of this scale in this location.

Conclusion

The proposed development should be **refused or significantly reduced in scale** on the basis that:

- It will **overload and endanger users** of an already substandard and narrow street network,
- It **violates national and local planning policy** requiring safe, inclusive, and DMURS-compliant infrastructure,

- No adequate mitigation measures have been proposed, nor adequate conditions imposed
- It sets a dangerous precedent for **overdevelopment in infrastructure-deficient areas**.

The burden of this infrastructural shortfall will fall on local residents, pedestrians, and vulnerable road users.

6. Phased Development Over 7 Years – Prolonged Construction Disruption

Cork City Council has granted a 7-year planning permission for this large-scale, phased development. This effectively authorises an extended period of major construction activity in a densely populated, topographically constrained residential area. The scale and duration of the works will result in sustained noise, dust, traffic congestion, construction vehicle movements, and disruption to local access over several years, 6 full days per week. The cumulative impact of such prolonged disruption has not been adequately assessed in the planning decision and poses a serious threat to residential amenity, public safety, and quality of life for local residents. A development of this scale, stretched across several years, would impose an unreasonable and sustained burden on the immediate community. Granting such an extensive timeline is inconsistent with the principles of proportionality, context-sensitive development, and good planning practice.

7. Disregard for Historical Significance and Ethical Concerns

The Good Shepherd site includes a former Magdalene Laundry, which is emblematic of Ireland's institutional past. This is not a standard brownfield site. It requires sensitive redevelopment and public consultation, in line with national commitments to memorialising institutional abuse survivors. Granting permission for high-density student accommodation on this land effectively erases this critical layer of our social history.

8. False Binary of Development vs. "Do Nothing"

The applicant's suggestion that refusal would result in a "do nothing" situation is reductive and misleading. Local residents and heritage advocates have identified multiple viable alternatives, which have been voiced to the local planning authority, including:

- A commemorative and interpretive centre.
- Community arts or cultural space.
- Low-impact mixed-use or social housing.
- Retention of open green space and reuse of historical structures.
- There is a clear lack of consideration for such alternatives in the decision-making process.

Conclusion and Request

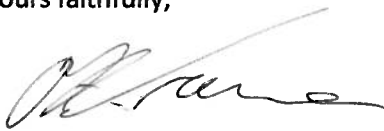
In summary, as demonstrated above, the proposal represents a significant overdevelopment of a sensitive, infrastructure-limited, and residential area. The decision to grant planning permission is problematic in numerous respects:

- It disregards the need for meaningful public engagement
- It misrepresents the demographic context using city-wide census data
- It ignores infrastructural and topographical constraints
- It contravenes multiple objectives of the Cork City Development Plan

I respectfully request that An Coimisiún Pleanála refuse this application on the basis that it does not constitute proper planning and sustainable development, and was granted without adequate public consultation or local impact analysis.

I attach the necessary documentation and payment with this appeal, as well as a copy of my submission to Cork City Council, Planning Development.

Yours faithfully,



Martin Krasa



Comhairle Cathrach Chorcaí Cork City Council

Halla na Cathrach, Corcaigh - City Hall, Cork - T12 T997

Martin Krasa
Buxton Villa
Sunday's Well Road
Cork
T23 X5A4

03/06/2025

Reg. No.: 25/43847

Applicant: Bellmount Good Shepherd Ltd.
At: The Former Good Shepherd Convent
Convent Avenue and
Buckston Hill
Sundays Well Cork

A Chara,

I wish to acknowledge receipt of your submission, received on 02/06/2025 regarding an application for A 10-year planning permission for the following Large Scale Residential Development (LRD) comprising 274 no. student accommodation apartments and a total of 957 no. bed spaces. The proposed LRD includes the following works: i) the partial demolition, conservation, redevelopment and extension of the existing former Good Shepherd Convent buildings for student accommodation use; ii) modifications (including the removal of a glasshouse extension) to the former Bake House/Coach House building to provide a community / amenity space; iii) the conservation, redevelopment and extension of the existing Gate Lodge to provide a café, co-working space and security/administrative office use; iv) the demolition of the former hostel building (known as Well House) and demolition of sheds, glasshouses and other ancillary structures on site; v) the construction of 8 no. new student accommodation apartment blocks ranging in height from 3 to 5 storeys; vi) the construction of a 3 storey mixed-use building with commercial/retail use at groundfloor level and student accommodation on the upper floors; and vii) all associated ancillary development works including vehicular/pedestrian access and pedestrian crossing on to Convent Avenue, new footpaths and raised table at the junction of Convent Avenue and Sunday's Well Road, landscaping, amenity and open space areas, boundary treatments, bicycle and car parking, bin storage, 2 no. ESB substations, public lighting and all other ancillary development at the Former Good Shepherd Convent, Convent Avenue and Buckston Hill, Sunday's Well, Cork. The proposed development consists of works to and within the curtilage of the former Good Shepherd Convent, which is a protected structure (Ref. No. PS721). The proposed development also consists of works to the exterior of structures which are located within the Sunday's Well Architectural Conservation Area. An Environmental Impact Assessment Report (EIAR) has been submitted to the planning authority with the application. The Environmental Impact Assessment Report will be available for inspection or purchase at a fee not exceeding the reasonable cost of making a copy during office hours at the offices of the Local Authority. The application may be



We are Cork.

inspected online at the following website set up by the applicant:
www.goodshepherdldr.ie
at The Former Good Shepherd Convent, Convent Avenue and, Buckston Hill,
Sundays Well Cork

This submission received in accordance with the provisions of the Planning & Development Regulations 2001 (as amended) forms part of the file, which is available for inspections by the public at the Planning Department, City Hall, Cork. Opening hours are Monday-Friday from 10.00a.m. – 4.00p.m.

You will be notified when a decision is made on the application.

This letter should be retained. If you wish to appeal such decision, a copy of the attached acknowledgement must accompany your appeal to An Bord Pleanála.

A copy of the Council's decision will issue to you in due course.

Mise, le meas,

Aisling Ring

Aisling Ring
Assistant Staff Officer
Planning & Integrated Development

Acknowledgement of Receipt of Submission or Observation on a Planning Application

THIS IS AN IMPORTANT DOCUMENT

Keep this document safely. You will be required to produce this acknowledgement to An Bord Pleanála if you wish to appeal the decision of the Planning Authority. It is the **only** form of evidence which will be accepted by An Bord Pleanála that a submission or observation has been made to the Planning Authority on the planning application.

Planning Authority Name:

Cork City Council

Planning Application Ref. No.: **25/43847**

A submission/observation, in writing, has been received from:
Martin Krasa, Buxton Villa, Sunday's Well Road , Cork, T23 X5A4
on **02/06/2025** in relation to the above planning application.

The appropriate fee of €20 has been paid. *(Fee not applicable to prescribed bodies).*

The submission/observation is in accordance with the appropriate provisions of the Planning and Development Regulations, 2001 (as amended) and will be taken into account by the Planning Authority in its determination of the planning application.

Aisling Ring

**Community, Culture &
Placemaking Directorate**

Date: 03/06/2025

Martin Krasa,
Buxton Villa
107 Sunday's Well Road
Cork
T23 X5A4

Planning Development Management
Cork City Council
City Hall
Anglesea Street
Cork

Planning Application Ref.:	2543847
Planning Applicant's Name	Bellmount Good Shepherd Ltd.
Address and Location of proposed LRD	The Former Good Shepherd Convent Convent Avenue and Buckston Hill Sunday's Well Cork

To Whom it May Concern,

Please find attached my submission to the above Planning Application which I urge the Cork City Council to reject.

I am a local resident, having lived for over four decades in the close vicinity of the above site for which planning permission is sought.

I thank you in advance for taking into serious consideration my following objections and observations on the following pages.

Martin Krasa

I welcome the opportunity to respond to the above Planning Application. As a long-standing resident and home-owner at this address very close to the Good Shepherd Convent site, I bring real, lived experience to my observations and objections.

In times of a recognised national and local housing crisis when there is a critical need to provide homes, this planning application does nothing to offer a solution. Instead, it seeks to implant a significant transient student and tourist population (during lengthy holiday periods), doubling the numbers of the existing community in this long-established home-owning residential area. This, by its very nature, would significantly impair the character of the neighbourhood, and negatively impact the enjoyment, privacy and security of the adjacent and nearby homes and properties, and in addition endanger safety on the already congested and inadequate local roadway and footpath infrastructure.

I object to this planning application with regard to:

- The type of accommodation, and this particular repurposing of this historic site
- The nature of the target population and the excessive number of residents proposed
- The over development of the site given its situation and location and historical significance
- The incongruity of the design and architecture of the application
- The resulting dangers and transport issues due to inadequate and poor local road and footpath infrastructure, arising from the topography of this area of Cork City
- The problematic access of emergency services to this restricted-access site
- The lack of any viable existing public transport infrastructure in or planned for Sunday's Well
- The poorly conceived and error-ridden Construction Management Plan
- Inconsistencies, contradictions and factual errors in the application documents
- The inevitable loss of privacy, safety and enjoyment of homes and properties that this development will entail

The fact that none of the previous permissions to develop the site has been acted on, over several decades, indicates that, in reality, the site is neither suitable nor viable for a large-scale development as proposed, and **I urge Cork City Council to deny permission for this application.**

To avoid this historic site remaining unused and derelict, it is pressing for both Cork City and the state to reassess and re-evaluate the plans and to earmark a repurposing of this site, **through consultation with the local communities**, taking into account its unique and important history, respecting (not just paying lip-service to) the nationally-recognised horrors of the mother and baby home that were committed here in the name of church and state, acknowledging and respecting its unique history, and transforming it into a socially responsible, commemorative, multipurpose and community centred site, containing a measure of mixed housing in this unique setting of peace and tranquillity, making it a showcase for Cork as a vibrant and global city and perhaps a showcase for the whole country.

I wish to make the following PRELIMINARY OBSERVATIONS and objections to the planning application:

1. The public planning site notice attached to the lamppost outside the former Annie's bar on Sunday's Well Road is posted 2.20 metres high facing westwards only, and not within eyereach. At that height it is easily passed by and it is impossible to read for a person of average height. The notice on the property gate at its eastern side at the top of Buxton Hill is placed above the entrance gate, approx. 2 metres above ground level, thus also above average eyeline. Whether deliberate or not, the positioning of these notices meant that they were illegible or even invisible to most passers-by.

2. It is most regrettable that unlike with previous applications to develop this large property of the Good Shepherd Convent site and contrary to respecting the local community, which the application repeatedly claims to foster, no public community meeting was offered - neither by the applicant nor, indeed, by the City authorities. In several sections of the Cork City Development Plan 2022-2028, as in its predecessor, there is repeated emphasis on fostering and supporting local communities in the city. There was no offer to initiate a local public discussion by the local authority to discuss the rehabilitation and repurposing of this long-derelict and deeply historical and significant site.

Neither the developer nor the City Council nor any public Representatives throughout the years of its increasing dereliction have thought fit to approach the Sunday's Well residents, even in the interests of fostering community spirit, to hold meetings or seek views about the future and the repurposing of this historical site. Many suggestions for alternative developments have been put forward to Cork City Council by individuals and groups in submissions on previous planning applications in our eager desire to promote a respectful regeneration of the abandoned site, but no further contact has ensued.

3. For what purpose is a ten year planning permission being sought by the Applicant? Planning permission is normally granted for five years. The application claims that occupancy of the completed site is planned in 2027. Ten year Planning permission is unnecessary. I question its validity. The granting of a 10 year permission could bolster land-hoarding, speculation and yet further dereliction.

I turn to my SUBSTANTIVE COMMENTS AND OBJECTIONS to the planning application.

My objections are, in part, predicated by the Cork City Development Plan's general description of the Sunday's Well area, designated "Architectural Conservation Area" (ACA), and the clear enunciation of extremely problematic road network issues and the Cork Cycle Network Plan – updated 2017.

Cork City development Plan Volume 3, page 103 ("Sunday's Well")

1.204 and 1.205 "Building typology"

"The area's buildings range from the large institutional buildings in stone and brick through larger detached houses on their own sites, semidetached 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.

1.206 "Issues"

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. Lack of sufficient onstreet parking can be an issue for family occupation of houses, leading to pressure for the creation of offstreet parking with the resultant loss of front gardens. 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 surrounding road network."

The constituent sub-areas of Sunday's Well are described as "... (areas) of architectural, historical and social significance" and "of architectural and historical interest"

1.

I object strongly to the proposed new buildings on grounds of incongruence with the existing historic, period architecture and protected buildings on the site and with the architecture in the surrounding ACA neighbourhood.

The new blocks of the proposed development are totally out of character with the architectural heritage and the predominant built historic architecture of the area of this long-established, settled residential area of the city, mainly of owner-occupied properties, and does not conform to the Cork City Development Plan. The proposed development will alter negatively the unique character of the area. The proposed construction of a dense area of linear 3 to 5-storey concrete residences is in sharp contrast to the dominant housing and typical red-brick buildings and brightly painted houses of this ACA, and will undermine the environment of the existing residential area. The proposed new buildings, in particular those exposed at the south and east, are not sensitive to the historical importance and character of the site and of our city. They impact negatively on its features by their density, number, their size, their mass, their appearance and their design, finish and colour. (the contrast and incongruence is evident in many pictures of the photomontage in the Application Document EIAR Part 2 Vol. III - erroneously listed in the Cork City Planning application as "Specialist Report from Applicant, Volume I-IIIWEB") These buildings – due to their sharp features, design, colour and finish will contrast severely with the existing red-brick, pitched-roof housing and be dominant and ever-present viewed from the neighbouring houses and from the adjoining streets of Upper Janemount, Buxton Hill, and across the city from UCC.

The bland, "flat-pack" design of the 8 new blocks arranged on this site regrettably give the appearance of an implanted internment camp in a historic area. It is plain and unimaginative, and a slur on the historic value, importance and tradition of this, one of Cork's oldest areas, and of the Good Shepherd Convent site itself. By their design and finish, they show no respect to the memory of the former inhabitants and inmates and serve to obliterate the past. Such student apartment buildings are perhaps more suited to the areas of the city which have been specifically earmarked for student housing, such as the Carrigrohane Road or Victoria Cross.

2.

I object on the grounds that I will lose privacy and the enjoyment of the use of my property in Buxton Villa and Hollymount, Buxton Hill, which will be overlooked by new buildings B2, B5 and B6 and also by their inhabitants. From my property, these will be dominant, obtrusive, and invasive to me and my family, and out of character with the existing architecture.

3.

I object to the density of the housing and the nature of the population envisaged and that this will have significant negative impact on local amenities and infrastructure.

The density of the development housing is staggering. The proposal to develop 8 residential units to accommodate 957 students during term time and a similar number of visitors/tourists in holiday periods is staggering. This figure is a 20% increase on the already intolerably high residential number in the last planning application of 2017. The current application would increase the local population in Sunday's Well by between 100% and 180%. (cf CSO census of 2022 - census areas AO48059002 and 59003, or these plus areas 59005 and 51010). This is way out of proportion and would totally change the nature of the area. Moreover, this is unsustainable in an already densely populated area with regard to the impact on the community, the amenities, roads, traffic, public services, water supply, waste water etc. There is no evidence of consideration having been given to the consequences of huge population increase of the area in the planning process. This would not only radically change the character and nature of the area but augment dangers and hazards on the infrastructure and the built environment and negatively affect the natural environment and wild-life.

The density of the proposed development of buildings on the southern and eastern sides of the site will **intensify greatly the problems of flooding and ground saturation, and drainage beyond the southern boundary of the site** and is contrary to good planning. In persistent or heavy rainfall we experience regular problems with ground saturation, flooding and pooling in the Buxton Hill area on our property and on the laneways. Ground soakage will be further impaired as it will be encased by concrete. Comprehensive independent studies must be carried to determine the whereabouts of natural springs which abound in Sunday's Well (the area is not called Sunday's Well for no reason!)

4. Implanting a large transient group of circa 1000 students in the midst of a relatively small community will at least double the density of the Sunday's Well and Blarney Street area. **It therefore will not enhance the local community but dominate it.** By the very nature of their temporary presence in this old-established residential area, they will significantly change its nature. Furthermore, during the lengthy holiday periods the application envisages that students will be supplanted by an even more transient group – short-stay tourists. **Community integration, and creation and advancement of community, as advocated in many parts of the Cork City Development Plan, will not be achieved by imposing huge numbers of transient residents into this area.**

Such large numbers (c. 1,000 + staff) will cause an additional strain on amenities and infrastructure, parking and traffic.

A more measured development of mixed housing accommodation, catering for different social groups and ages, would be conducive to community development and integration and could be effective in reducing the housing crisis.

The constant movement of circa 1,000 students and tourists in and out of the development and the neighbourhood would adversely affect our privacy and personal safety and invade the privacy and enjoyment of the homes and properties in the immediate vicinity of the site

The main third-level institutions are on the south side of the river (UCC has decided to move its music department away from the St Vincent's complex); it makes little sense to have large numbers of students (c. 1,000) constantly moving to and from Sunday's Well due to the area's challenging infrastructure and awkward access. Other more suitable quarters of the city have been especially designated as student residential districts.

5. I object to the **inadequate and inaccurate Construction and Environmental Development Plan**. It is vague, aspirational and contains inaccuracies. It inspires little confidence in the ability of the Applicant to achieve a reasonably seamless, safe and non-invasive development in a densely populated residential area over what must be a lengthy construction period.

- To advance its credentials, the CEMP document (page 1) states the experience of the company in developing student residences in Cork: not a single one of these examples listed are sites which are remotely similar or which have the extreme complications of the Good Shepherd Convent site with the difficult local topographical and access issues in addition to the geological and archaeological. It is important to note that none of the sites listed as examples are situated in the midst of a densely populated historic residential area.

- The traffic access plan (section 8.2) for the entire development is unrealistic. Its description and maps of the Sunday's Well area road system is inaccurate, revealing lack of local knowledge of the geography, topography and condition of local roads and roadways. For example, Convent Avenue (not Convent Road) does not join Shanakiel Road. The use of Strawberry Hill, one of the steepest, narrowest inhabited urban roads in the country, as the main HGV access route for the site on Convent Avenue is highly questionable.

-The end-date for completion and opening is stated as 2027 (p3), ("Traffic and Transportation Assessment") but there is no timeline shown as how this will be achieved. This appears an extremely optimistic and more than unrealistically short development period, when previous estimates for completion were three to four years for a similar development here.

Concerns about the monitoring and imposed conditions of the development phase; remedies and sanctions for breaches of conditions.

How will the construction phase be independently monitored?

How will the construction traffic and the construction route be monitored?

Conditions must be imposed to ensure the health and the safety of residents in the immediate surrounding area will not be impaired during the development phase (demolition and construction)

Conditions must be imposed to ensure that residents' property – including vehicles, necessarily parked in front of or close to their houses (disability and health reasons etc) – is safeguarded on the demolition, construction and development traffic routes.

Conditions must be imposed to ensure that residents who live in the vicinity of the development site can continue to enjoy the normal use of their homes and property during the whole development period, including during the demolition and construction phases.

What measures will be taken to monitor that all imposed conditions in the development of the site are not breached?

What measures will be taken to remedy and repair breached conditions? What sanctions will be imposed if regulations and conditions imposed are breached?

6. EMERGENCY SERVICES – problems of access to cater for the existing population

Access for emergency services to cater for an extra 1000 inhabitants is problematic in an area that is already challenging due to its surrounding narrow access roads and frequently congested routes with sharp bends and steep hills (Sunday's Well Road, Shanakiel Road, Convent Avenue, Strawberry Hill, Blarney Street, Buxton Hill, Lower Janemount, Wyse's Hill)

Convent Avenue is the one and only viable road access to the proposed densely populated site.

Buxton Hill is a steep narrow one lane road with width between 2.52 metres and 3.57m at its widest point. It is officially designated – and signposted - as “unsuitable for heavy vehicles”. Cork has at its disposal just one small fire tender (unless out of action) that can access the site via this route.

6. I object on the grounds of the negative and dangerous consequences of almost 1000 extra residents on local traffic and the ensuing dangers on the local roadways and footpaths.

The Traffic and Transportation Assessment document makes astonishing assertions and assumptions and contains incomplete and inaccurate information about the local road network (pp5- 6 - omission of Strawberry Hill – which is another potential route for ‘active travel’, albeit hazardous, but also earmarked for the development phase - and an inaccurate description of Buxton Hill which has multiple residences, laneways and driveways) and about bus services which are effectively non-existent in Sunday’s Well and of little use to the envisaged student population.

The density of the development will have a major impact on traffic in the area and would cause major hardship on the residents of the Sunday’s Well area as well as those who pass through the area on a daily basis to access places of work and shops. The development plans suggest minimal impact on traffic and minimise the reality of the dire traffic flow and ever increasing volumes and congestion in the Sunday’s Well area. Anyone who lives in or is familiar with Sunday’s Well can attest that the traffic description is farfetched and not the reality. No comprehensive traffic study has been done in the area to support this application.

Traffic was assessed, for the purpose of this planning application, **on one day only** – 21st May 2024 - (p3 of the “Traffic and Transport Assessment”). It is **statistically unsound** to extrapolate traffic predictions for coming years from a one day study. Traffic probability distribution cannot be made on this basis. A technical independent evaluation must be carried out. Such spurious results bring into question all other statistical studies in the application. Everyday traffic congestion occurs several times daily and the roads are regularly blocked, not just at rush hours, because of their narrowness and traffic volumes. Proper planning and development should take account of the volume of additional traffic that will be generated by the c. 1,000 residents of the proposed development and their visitors, and the hazards that additional traffic (including fast-food deliveries and e-shopping deliveries) will generate for residents and all road users.

It is claimed in the application that the 957 students in the new development will not use cars. This head-in-the-sand- attitude beggars belief. No evidence is presented to substantiate this claim. Even if some have cars (10% = almost 100 cars), this will a) increase the pressure for on-street parking, which is already high with cars constantly parked in all available spaces on all surrounding roads. b) increase congestion on the already congested roadways in the area.

STUDENT AND TOURIST MOBILITY:

There is no adequate bus service which serves Sunday’s Well and the places of learning. I contend that on the contrary, based on experience and practical reality, parking space will be sought by a significant proportion of the students and of tourists. Even only 5% with cars = 50 cars; 10% = 100 cars; 15% = 150 cars etc. This will create extra congestion on the poor local road infrastructure and increased hardship for the permanent residents of Sunday’s Well in competition for parking spaces.

Furthermore, as the new development is earmarked for holiday rentals to tourists - most of whom will surely use cars - outside the academic year, this will inevitably lead to a serious demand for parking spaces over three + months of the year and bring considerable added street traffic congestion to the area.

CYCLING and WALKING

The Application maintains that "active travel" will be predominant for the c. 1,000 student population targeted for this development. Is that seriously also envisaged for the c. 1,000 tourists who are targeted to stay there during the 3 month summer holidays?

Cork Cycle Network Plan Ch 7, p55 states clearly:

"...Blarney Road, Shanakiel Road, Sunday's Well and Fair Hill...some of these routes are not favourable for cycling due to gradient differences.

One of the main difficulties facing the development of a cycling network in this area is the challenging topography which results in a number of very steep routes to and from this part of the city."

The local infrastructure and road network is thus recognised as being totally unsuitable for a significant increase in both cyclists and walkers. Many road widths do not conform with DMURS standards (the widths of significant stretches of the Sunday's Well roadway network are far below the minimum width of 5 metres for local roads). **A full-scale independent risk assessment must be carried out to investigate the impact of the introduction of 1,000 extra walkers and cyclists into this already congested area with its narrow, below standard roads and challenging topography.**

The footpaths in the Sunday's Well area are dangerously narrow even to cope with current footfall and most fall far short of DMURS standards. Adding 1,000 extra people to this on a daily basis is playing with life and death.

7.

I object on the grounds that the Applicant has not responded with clarity or in sufficient detail to several elements of the Cork City LRD Opinion.

Many responses are vague or aspirational or do not take account of the environmental, architectural, topographical problems in the area surrounding the site. They do not address the interaction of the development of the site with real experienced issues in Sunday's Well, particularly with regard to the poor road and footpath infrastructure.

8. On question 17 a, "Pedestrian Accessibility", (p21, Cork City LRD Opinion) the issue of two pedestrian access points to the site is raised, one of them at **Buxton Hill**. (the other is at Convent Avenue)

I strongly object to the use of the proposed entrance/exit on the east side of the site for pedestrians and cyclists, including scooter, (and vehicular traffic) at the top of BUXTON HILL (also known as BUCKSTON HILL) which is totally inappropriate for the reasons outlined below:

Buxton Hill would be a preferred student shortcut from this site to the city centre as well as a route to UCC as an alternative to Convent Avenue. It could also be an entrance for students and tourists wishing to park their cars on Upper Janemount and Sunday's Well Road.

Because of its physical and topographical restrictions and the numbers of doorways and vehicular exits on to it from many private dwellings, Buxton Hill by the very nature of its narrowness and steep gradient is not designed or suitable for significant footfall and bicycles, scooters (motorised or not), nor an increase in cars and cannot sustain any significant increase of use above the current levels. The use by up to 1000 students and tourists would create a vastly increased hazard for existing households, which number several families with young children and a significant older population. It would also be an intolerable intrusion on the privacy of the surrounding houses and properties.

Buxton Hill, leading to Upper Janemount at a 90 degree blind bend, is a very steep, narrow, one-lane residential cul-de sac, bounded by high old stone walls, with no footpath and with a constant volume of traffic. It is designated officially as **"unsuitable for heavy vehicles"** and provides a huge challenge for emergency vehicles e.g. fire-tenders and ambulances. Similarly, only smaller refuse trucks can negotiate Buxton Hill.

The hazards and dangers to health and safety on Buxton Hill arise particularly at the 90-degree bend where Buxton Hill meets Upper Janemount, and again, even more significantly, at the junction of Buxton Hill and Sunday's Well Road where there is dangerous blind corner with a heavy stream of road traffic. **Here the sightline is non-existent.** This danger is particularly acute when vehicles exit from Buxton Hill and turn either east or west onto Sunday's Well Road. The danger of entry and egress is acute for both pedestrians and cyclists as well as for vehicles, due to **the blind turn at the south-western corner, at which the Sunday's Well Road has a dangerously narrow footpath** outside 109 Sunday's Well Road, the former butcher's shop, (1 metre tapering down to 60 cm) and a road width of a mere 4.20 metres along this narrow stretch of road to the end of Buxton Terrace. On Buxton Hill and at the corner of Buxton Hill and Sunday's Well Road pedestrians and cyclists have to squeeze against a wall to allow cars to pass or else to take shelter at a gate entrance on the hill. At present, the area of Buxton Hill and Upper Janemount serves 30 – 35 households. That almost 1000 students during the academic year and 1000 tourists during the 3 + other months who may use this entrance according to the proposals is neither feasible, safe, nor practical.

The **width of Buxton Hill** varies at its **narrowest point of 2.52 metres** to its **widest at No 4 to 3.57 metres** at the driveway gate to Buxton Lodge. The width of the road at the top of Buxton Hill (near the east gate of the Good Shepherd Convent site) is **2.77 metres wide** at the 90 degree bend. **The DMURS minimum stated roadway width is almost twice as much - 5 to 5.50 metres.**

There are several **vehicular access points onto Buxton Hill** from a narrow laneway above Buxton Lodge (5 households) and from **several private driveways** of the other bordering houses. Upper Janemount has several houses, some with driveways but most where road parking for residents is obligatory.

Parking issues in this area: Upper Janemount is not an appropriate area for parking for students and tourists who may have cars, construction workers or employees connected with the development, as local residents would find themselves in constant competition with them.

Conclusion:

With Buxton Hill being an unfeasible, unsuitable and unsafe route to sustain the comings and goings of the populous development of 1000 students and tourists, there can be only one viable entrance

to the site, which is on Convent Avenue. N.B. No consideration whatever has been given to the proposed Buxton Hill pedestrian exit route in the Traffic and Transportation Assessment document. This is a serious failing in the application.

9.

FOOTPATHS AND PEDESTRIANS – Sunday’s Well - From Buxton Hill westwards to Daly’s Bridge, Sunday’s Well Road has many unsafe and dangerously narrow footpaths that do not meet DMURS standards but which must be negotiated to reach Daly’s Bridge. **A doubling of the local population would vastly increase health and safety and danger to life for all road users.** Adequate mitigation measures are not proposed and would be impracticable.

It is presupposed in the Application that the majority of the 957 potential inhabitants and the users of the new development will move to their institutes of learning on foot, bicycle or perhaps by bus, as only 37 car parking spaces are scheduled to be provided on site. There is no bus service to UCC; there is only a very limited, inadequate bus service (no 201) to MTU the stop is 400 metres west of the entrance to the site beyond the Shakey Bridge steps. The return 201 bus route does not serve MTU. The bus services on the Western Road linking the City centre with the western suburbs are 1 km away from the Good Shepherd site (across the Shakey Bridge). Therefore we must assume that, if up to a thousand students and tourists do not use cars they—in addition to the local residents - , will be subject to a multiplication of safety and danger issues on the footpaths and roads.

The local road and footpath infrastructure on the given routes from the proposed development to UCC and back (and to the nearest bus stop), are totally inadequate and dangerous for a significantly enlarged population of this area, as proposed by the Applicant. (100 to 150% increase in local inhabitants, acc to 2022 census) See tabular presentation of footpath widths on next page. **The application for this particular development should be rejected on these grounds. No possible mitigation measure is adequate to cope with footfall of such significant numbers and has not been taken into consideration.**

The proposed “Pedestrian Connectivity Improvements” (p 30, “Traffic and Transport Assessment”) are woefully inadequate. The significant factual problems of width and obstructions of the Sunday’s Well Road footpaths (where they exist), as detailed below, have been ignored and not examined.

Footpaths from Convent Avenue to the Shakey Bridge (Daly’s Bridge)

N.B. DMURS guidance/regulation for footpath width is 1.80 metres: DMURS 4.3, pages 86-87

Even if it were the case that barely any students will have cars, and will walk and cycle en masse, the roadway and footpath infrastructure from the site entrance at Convent Avenue to the Shakey Bridge (Daly’s Bridge) is totally inadequate and dangerous to cater for a significant increase in footfall (up to 1000) as proposed. Any mitigation measures proposed are totally inadequate. Those students who cycle or scooter must dismount but do not always do so, thus creating a dangerous hazard for pedestrians.

The narrow or non-existent footpaths along much of this route, as well as the narrow roads, fall far short of DMURS standards. They are even now currently inadequate and dangerous for coping with existing foot traffic, mostly barely adequate or not even so for two people to pass. The one and only point at which the width of the footpath on the Sunday’s Well Road complies with the DEMURS regulations is on the south side of Sunday’s Well Road at the pedestrian light between 58 and 59

Sunday's Well Road. (212 cm). The width of the footpath at the north side of the road at this point of the pedestrian light is only 137 cm.

Footpath measurements are as follows between 54 Sunday's Well Road and the final bend near the steps leading to the Shakey Bridge on the south side of the road: The footpath on the south side of Sunday's Well Road between the junctions with Buxton Hill and with Convent Avenue are less than 1 metre, with bollards obstructing the free flow of pedestrians. From Convent Avenue to no 54 Sunday's Well Road there is no footpath on the south side of the street.

Comparison with DEMURS guidance/regulation for footpath - 180 centimetres

Outside of House number (S.Well Rd)	footpath width Sunday's Well Road in centimetres	
	on north side of road	on south side of road
54	110 cms	59 cms
55	123	102
56	124	110
57	139	102
Junction of Shanakiel Road and North side of SWR	----	87
58	----	84
58A	110	95
Pedestrian Light	137	212
59A		153
60		113
61		117
62		113
63		136
64		89
65		92
At bend before steps to Shakey Bridge		96

It must also be added that there are footpath bollards along the south side of the road which are hazardous obstacles for pedestrians and which narrow the footpath even more, this being an extra reason for pedestrians to step out onto the road.

At the south west corner of Convent Avenue the footpath on the north side of Sunday's Well Road tapers from 124 cm to 104 cm.

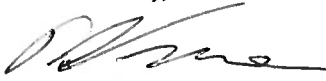
Outside the cottages at 82 to 85 Sunday's Well Road (north side) between Convent Avenue and Shanakiel Road there are dustbins permanently on the footpath which obstruct the passage of pedestrians.

In summary, the Sunday's Well area cannot cope with a large influx of new temporary inhabitants, as demonstrated in the above arguments. The infrastructure is not fit to cope in any measure of safety nor with the assumed few mitigation measures offered. Sunday's Well is not designed and planned to cater for a doubling (or more) of its population. Because of the very challenging topography and infrastructure which is already under great stress, this area is not fit for such a large-scale development. Access roads are challenging in the extreme for heavy vehicles, whilst health and safety risks are already present for the current population, casual visitors and passing traffic. Pedestrians are forced onto the roadway in many locations when passing; DMURS regulations are breached in multiple places and in a number of road stretches footpaths are non-existent. The narrow roads do not allow for footpath widening in many critical areas, nor for the creation of cycleways. In fact, the very nature of the difficulties of access to the Sunday's Well area in general and to the site in particular are well catalogued, and are starkly and clearly documented as extremely challenging in the Cork City Council's own CCDP Volume 3.

I am not against a sensitive and appropriate and genuinely sustainable development of the Good Shepherd site, respectful of its historic significance. Therefore, I ask Cork City Council, having considered the evidence of facts and observations above to reject this planning application and to initiate meaningful consultations with the local community to agree on a more acceptable proposal.

I attach my fee of €20 with this submission,

Yours sincerely,



Martin Krasa

2nd June 2025