

File With _____

**LARGE RESIDENTIAL
DEVELOPMENT
CORRESPONDENCE FORM**

Appeal No: ACP 323082-25Please treat correspondence received on 18/08/25 as follows:

1. Update database with new agent for Applicant/Appellant _____ 2. Acknowledge with LRD <u>40</u> 3. Keep copy of Commission's Letter ☐	1. RETURN TO SENDER with LRD _____ 2. Keep Envelope: ☐ 3. Keep Copy of Commission's letter ☐
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Amendments/Comments	<u>online obs from Grace Neville</u>

4. Attach to file (a) SHD/LRD Unit ☐ (b) Inspector ☒	RETURN TO EO ☐
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	Plans Date Stamped ☐ Date Stamped Filled in ☐
EO: <u>Wanki LK ark</u>	AA: <u>[Signature]</u>
Date: <u>21/08/25</u>	Date: <u>22/8/25</u>

An
Coimisiún
Pleanála

Large-scale Residential Development Appeal Observation

Online Reference
LRD-OBS-006343

Online Observation Details

Contact Name
Grace NevilleLodgement Date
18/08/2025 17:01:00Case Number / Description
323082

Payment Details

Payment Method
Online PaymentCardholder Name
Grace NevillePayment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG-082206-25

Reason for Refund

Documents Returned to Observer

☐

Yes

☐

No

Request Emailed to Senior Executive Officer for Approval

☐

Yes

☐

No

Signed

EO

Date

Finance Section

Payment Reference

ch_3RxVUWB1CW0EN5FC0fjqpoLT

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board
Member

Date

Date

OBSERVATION TO AN COIMISIUN PLEANALA

Prof. Grace Neville

'Buxton Villa'

107 Sunday's Well Rd

Cork

18 August 2025

To: An Coimisiun Pleanala

64 Marlborough St

Dublin 1, D01V902

Re: Observation on Planning application for 957 student accommodation places at the former Good Shepherd site, Sunday's Well, Cork – 250 student apartments (accommodation for 957 students with tourist use in vacation periods)

Planning Authority: Cork Council reference 25/43847

An Coimisiun Pleanala case reference 323082-25

Applicant: Bellmount Developments

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Dear Sir or Madam,

As a resident of the Sunday's Well Road for over the past forty years, and as a daily user of Buxton Hill (which I use in order to gain access to my parking area), I wish to make the following observations regarding the permission granted for the proposed development of the former Good Shepherd site.

Yours,

(Prof.) Grace Neville

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GROUNDINGS OF OBSERVATION

I. Introduction

The approval of a Large-Scale Residential Development (LSRD) of 250 units to house 957 transient occupants (students / tourists) at the Good Shepherd Convent site in Sunday's Well represents a failure by Cork City Council to meet both national planning principles and its own commitments as outlined in the Cork City Development Plan 2022–2028 (CCDP). The absence of any prior public consultation is in clear conflict with the stated goals of public participation, community inclusion, and sustainable, context-sensitive development. This lack of consultation also contravenes the principles of the Aarhus Convention (of which Ireland is a signatory) which stipulate that early and effective consultation with local residents is required before finalisation of a large-scale planning application.

II. Failure to Uphold Core Objectives of the Cork City Development Plan

A. CCDP Strategic Objective 3: A More Connected and Inclusive City:

"To foster strong communities and inclusive neighbourhoods through proactive public engagement and community participation in shaping Cork's future."

There was no engagement with the residents of Sunday's Well during the pre-application or design stages of the proposed development. A development for the largest ever student-resident complex in Cork, one that would triple the local population of the small residential area (currently 266 residents per CSO 2022 data), should have triggered enhanced outreach and dialogue. Residents were not made aware of the scale and nature of the proposed development until the application was well under way, precluding opportunities for genuine input or expressions of alternatives.

B. Chapter 11 – Placemaking and Communities

"The Council recognises that communities must be empowered to influence and participate in the planning and development process." (11.1)

This principle was not upheld in the case of the Good Shepherd LSRD. The development was progressed in a top-down manner, with minimal transparency, no community workshops, and no feedback loop from residents' concerns.

III. Inadequate Consultation in Sensitive Urban Context

A. Policy Objective 11.2: Community Participation in Planning

"To promote and facilitate greater levels of public and community engagement in the preparation and implementation of statutory and non-statutory plans."

While statutory notices were issued, these did not amount to genuine public participation or dialogue, especially given the scale and complexity of the proposal. No non-statutory community engagement

mechanisms (drop-in sessions, co-design workshops, targeted outreach) were used to inform or involve local residents.

B. Sunday's Well as a Sensitive Historic and Residential Area

The CCDP identifies Sunday's Well and its surroundings as an area of architectural, historic, and landscape value. Despite this, the Council failed to engage with residents on how this development might affect the local urban character, protected structures and views, traffic and access in a topographically constrained area

IV. Inconsistency with Compact Growth and Sustainable Communities Policies

A. Policy Objective 3.1 – Compact Growth in the Right Locations:

"To deliver compact, sustainable growth in a manner that respects the existing built and natural environment and enhances the quality of life of residents."

There was no community consultation to determine whether the proposed concentration of nearly 1,000 transient student / tourist residents aligns with the needs or character of the Sunday's Well community. The Council has utterly failed to demonstrate how this intensification enhances, rather than undermines, community life and local services.

B. Policy Objective 11.7 – Supporting Sustainable Neighbourhoods

"To support the development of sustainable and inclusive neighbourhoods where residents have a say in the development of their area."

The local community was not given the opportunity to meaningfully participate in shaping this proposal. The lack of local input contradicts the principle of fostering mixed, inclusive, and socially sustainable neighbourhoods.

V. Procedural Shortcomings Undermining Trust and Legitimacy

A. Tokenistic Consultation Undermines Public Confidence

The project documents produced were voluminous and technical, hosted online and without adequate contextual or executive summaries, or appropriate indexes. There was no dialogue or iteration between the developer, the planning authority and the local community – only a single submission window, followed by a decision. Such a resolutely user-unfriendly approach impedes any genuine attempt to co-develop a plan in partnership with local stakeholders, and undermines the trust of residents in both the Council and the broader planning system.

B. Missed Opportunity for Collaborative Planning

CCDP 11.3 encourages participatory and inclusive planning processes. A development of this magnitude could have benefitted from early engagement and co-design principles, reducing the adversarial nature of objections and enabling better outcomes for all.

Traffic regulation and management ref. T.P. : 25/43847

I particularly wish to draw attention to this document (Traffic regulation and management ref. T.P. : 25/43847) which forms part of the planners' report on the GS submission. It is a catalogue of fact-free, aspirational statements and factual errors. It would be tedious to list all of these, but the following highlights should give a flavour of the rest:

The document states that *'the proposed development is very well located being close to University College Cork and with good access to the centre of the city and the Munster Technological University'*. The reality is that the proposed development is at a c. 20 minute walk to the other side of the river from the centre point of the UCC campus (across the pedestrian Daly's Bridge – a route badly lit between the Sunday's Well Rd and the Western Rd); the MTU campus is situated at a greater distance. As previous submissions about this proposed have detailed, access by public transport to the MTU initially involves a 15-walk to the nearest relevant bus stop. The transport infrastructure identified in the Cork Metropolitan Area Transport Strategy (referenced in the planner's document) is simply not relevant to anyone living on the Sunday's well Rd or in the GS site as it includes no plans for the reinstallation of bus routes along most of the Sunday's Well Rd.

The planner states that *'limiting the scale of car parking associated with the development will manage the demand to travel by private car reducing the potential impacts on the surrounding street network'*. The logic here is curious, to say the least: the planner seems to imply that reduced car spaces will force people to walk or cycle. This grandly assumes that every one of the c.1000 students/ tourists is both able and willing to walk or cycle. Furthermore, even a cursory glance at the roads and badly parked cars around UCC and the MTU (Connaught Avenue and the Uam-Var estate, for instance) demonstrates that a shortage of parking spaces for students to park their cars does not in any way result in them walking or cycling.

Regarding the proposal to allow access to the GS via Buxton Hill: the planner acknowledges although Buxton Hill does not have dedicated footpaths, *'the nature of the street is that cars and pedestrian [sic] share the available space in a safe and collaborative fashion'*. This is an extraordinary, fact-free statement: how and when did the planner gather the evidence on which this assertion is based? As someone who has been using Buxton Hill for over 40 years, I challenge the planner to produce the evidence (not just his/her aspirations) on which this assertion is founded.

VI. Conclusion

The handling of the Good Shepherd Convent development reveals a stark disconnect between the Cork City Council's stated planning objectives and its practical implementation. Detailed submissions and appeals already lodged by local residents demonstrate that the local community is keen to see the GS site developed in a sensitive and imaginative way. However, at a time when trust in public institutions and politicians was never more needed in Ireland and more widely, it is extraordinary that

the Council should have acted in such a high-handed manner in its failure to engage meaningfully with local residents and with their well-argued concerns and alternative proposals.

Prof. Grace Neville

'Buxton Villa'

107 Sunday's Well Rd

Cork

