

File With _____

**LARGE RESIDENTIAL
DEVELOPMENT
CORRESPONDENCE FORM**

Appeal No: ACP 323082-25Please treat correspondence received on 31/07/25 as follows:

1. Update database with new agent for Applicant/Appellant _____ 2. Acknowledge with LRD _____ 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>observation from Claire McGettrick</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>Drewn lit cum</u>	AA: <u>SO</u>
Date: <u>20/08/25</u>	Date: <u>22/8/25</u>

Lodgement Cover Sheet - LDG-081914-25

Details

Lodgement Date	31/07/2025
Customer	Claire McGettrick
Lodgement Channel	Web Portal
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

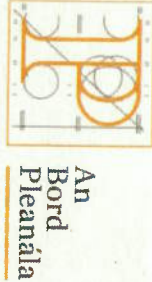
Categorisation

Lodgement Type	Observation / Submission
Section	Processing

Fee and Payments

Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Paid	50.00
Refund Amount	

Observation



Lodgement ID	LDG-081914-25
Map ID	
Created By	Daniel Moore
Physical Items Included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	2543847

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

Observation/Objection Allowed?	Yes
Payment	PMT-064270-25
Related Payment Details Record	PD-064105-25

LRD 40

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

PA Case Number

2543847

Development Description

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 ground floor 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

PA Decision Date	23/06/2025
County	
Development Type	
Development Address	The Former Good Shepherd Convent , Convent Avenue and , Buckston Hill, Cork City, Co. Cork
Appellant	
Supporting Argument	

	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 inspected online at the following website set up by the applicant: www.goodshepherdind.ie
Applicant	
Additional Supporting Items	Yes

Run at: 07/08/2025 10:17

Run by: Daniel Moore



An
Coimisiún
Pleanála

Large-scale Residential Development Appeal Observation

Online Reference
LRD-OBS-006336

Online Observation Details

Contact Name
Dr Claire McGettrick, born
Lorraine Hughes

Lodgement Date
31/07/2025 20:06:51

Case Number / Description
323082

Payment Details

Payment Method
Online Payment

Cardholder Name
Claire McGettrick

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

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_3Rr1oVB1CW0EN5FC1Q4P9Jv8

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



JUSTICE FOR MAGDALENES RESEARCH

Submission to An Coimisiún Pleanála

Re: Proposed Property Development
at the Site of the Former Magdalene Laundry, Sundays Well, Cork

ACP Reference: LH28.323082
Cork City Council Reference: 2543847

31st July 2025

Authors

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The main aim of JFMR is to provide for the advancement of education of the general public by researching the Magdalene Laundries and similar institutions and by providing information and support to the women who spent time in the Magdalene Laundries and their families.

1. INTRODUCTION

This submission sets out observations from Justice for Magdalenes Research (JFMR) to An Coimisiún Pleanála (ACP) in relation to the proposed development on the site of the former Magdalene Laundry and Industrial School run by the Good Shepherd Sisters at Sundays Well in Cork City.¹ This submission is guided by the views of survivors, affected people² and family members who are in contact with us. These individuals include women who were incarcerated in the Magdalene Laundry and those who were detained at the Industrial School at Sundays Well. In the sections that follow, we highlight the lack of consultation with those most affected; the need to repair, maintain and provide access to the Magdalene graveyard adjacent to the development; our concerns surrounding inaccuracies on the headstones at the site; the question of undocumented burials; the need to actively search for and preserve records and artefacts; and the importance of ensuring active memorialisation and acknowledgement of those who suffered human rights abuses at Sundays Well. **We strongly encourage ACP to read the oral histories of women who were incarcerated in the Magdalene Laundry and the Industrial School at Sundays Well.**³

2. LACK OF CONSULTATION

Any property developer seeking to build on a site where gross human rights violations have taken place should, at minimum, ensure that the history of the site is not erased, and that survivors, affected people and their families are consulted on the design. However, as one Cork City Council (CCC) *Planners Report* notes in relation to the proposed Sundays Well development, '[t]here has been no consultation with survivor groups or commitment to survivor-led memorial process - in effect erasing the sites [sic]

¹ ACP Reference: LH28.323082/Cork City Council Reference: 25/43847.

² We use the term 'survivors and affected people' to mean all those who are impacted by Ireland's system of institutionalisation and forced family separation. The term is deployed with the intention of ensuring that our terminology is as inclusive as possible, in recognition of the fact that: (i) not all affected people identify as 'survivors' or 'victims', and (ii) human rights violations were (and are) not exclusive to institutional settings.

³ O'Donnell, K., Pembroke, S. and McGettrick, C. (2013) *Magdalene Institutions: Recording an Oral and Archival History*. Available at: <https://jfmresearch.com/home/oralhistoryproject/transcripts/survivors/>.

history'.⁴ **JFMR is troubled by this lack of consultation with those most affected, and, as highlighted in this submission, it is abundantly evident in the design of the development.**

Furthermore, we note that the CCC *Archaeology Report* and Condition 10 of the planning permission granted by CCC stipulate that:

The developer shall submit for the agreement of the Planning Authority the interpretation plan for the former Bake House, to include particulars on the nature and extent of the interpretation concepts, evidence of consultation with 3rd Party interests and a management plan for the interpretation area.⁵

JFMR contends that this condition is too vague and makes insufficient reference to the history of the site, in particular the fact that gross human rights violations took place at Sundays Well. In the event that An Coimisiún Pleanála decides to grant permission for this development, **JFMR urges ACP to place an explicit condition on the developer to ensure that the history of the site is fully acknowledged and to meaningfully consult with survivors, affected people and family members, and provide evidence of that consultation (see also Section 6).**

3. GRAVES AT SUNDAYS WELL

Justice for Magdalenes (JFM, now JFMR) was established in 2003 on foot of serious questions raised by the late Mary Raftery about the exhumations at the former Magdalene Laundry at High Park. Although the High Park exhumations took place in 1993, most of the 155 women who were disinterred to make way for a property development remain unaccounted for.⁶ **Thus, JFMR is keenly aware of the implications of property developments at sites where human rights abuses took place.**

⁴ Foley, M. (2025) *Planners Report*, 20th June, 2025, p. 29. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

⁵ Brett, C. (2025) *Archaeology Report*, p6; Cork City Council (2025) *Notification of Decision to Grant*, 23rd June 2025, Condition 10. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

⁶ See Chapter Eight of McGettrick, C., O'Donnell, K., O'Rourke, M., Smith, J.M. and Steed, M. (2021) *Ireland and the Magdalene Laundries: A Campaign for Justice*. London: IB Tauris/Bloomsbury.

3.1 Magdalene Grave at Sundays Well

The Sundays Well campus includes two graveyards, one of which is situated at the northeast (where the religious sisters and Ellen Organ⁷ are buried), while the other cemetery is located at the northwest of the site. The graveyard to the northwest of the site holds the remains of Magdalene women known as 'auxiliaries', also known as 'consecrated Magdalenes'—that is, those women and girls who purportedly vowed to remain in the laundry for life in exchange for a quasi-religious status. At Sundays Well,⁸ auxiliaries were buried in their own graveyard on the institutional campus, while the other Magdalene women and girls who were buried in the public graveyard at St Joseph's Cemetery in Cork.⁹ While the auxiliaries may have had a higher status than other Magdalene women and girls, these women were nonetheless marginalised in death, buried a significant distance from the religious sisters whose remains are located at the opposite end of the site.

Case Study

Margaret G. is one of the women buried in the Magdalene graveyard at Sundays Well. Although newspaper reports suggest that Margaret was living in East Wall at the time of her sentencing, we believe she may originally have been from Cavan, and that she was born around 1908 or 1909. In 1932, when she was in her early twenties, Margaret was sentenced to twelve months' imprisonment for what was termed the 'concealment of the birth of her illegitimate child'. The judge said the sentence 'would not come into effect' if Margaret went to the Good Shepherd Magdalene Laundry in Cork 'and be subject to the supervision and direction of the Superioress there for a period of two years'.

However, Margaret never left the laundry. She died in February 1978, aged sixty-nine, from hemiplegia (paralysis), cerebral thrombosis (blood clot) and arteriosclerosis (vascular disease). We know that Margaret (sometimes known as 'Maggie') never left Sundays Well because she appears in each of the available electoral registers for Sundays Well between 1966-1978. Although she was originally sentenced to two years in Sundays Well, Margaret spent a total of forty-six years in the laundry.

Source materials have been omitted to protect Margaret's privacy.

⁷ Also known as Little Nellie.

⁸ And at other Magdalene institutions, including the Sisters of Our Lady of Charity laundry at High Park and the Sisters of Mercy laundry in Galway.

⁹ Women who died between the 1990s and the present day are buried at Kilcully Cemetery in Cork.

While the Magdalene graveyard lies outside the boundaries of the proposed development, nevertheless, it is inextricably linked to the site and its history. Most importantly, having considered the design of the development, we are concerned that Margaret G. and the other women buried in this cemetery will be even further marginalised if measures are not taken to prevent this.

3.1 Magdalene Graveyard: Inaccuracies on Headstones

The Magdalene Names Project (MNP) is a JFMR initiative which was established in 2003. The MNP uses available data¹⁰ to ascertain the identities and whereabouts of women who died while incarcerated behind convent walls.¹¹ The MNP databases include the names of thirty women who are interred in the auxiliaries' graveyard adjacent to the proposed development at Sundays Well.¹² As shown in the documentaries *CBS 60 Minutes*¹³ and *Les Blanchisseuses de Magdalene*,¹⁴ a Sunday's Well industrial school survivor campaigned to have names retrospectively inscribed on the Good Shepherd graves. **While the Good Shepherd Sisters placed inscribed headstones at Sundays Well and at St Joseph's Cemetery, these markers show significant gaps, duplications, and other errors and discrepancies.** In 2013, following on from concerns raised by JFM, Conall Ó Fátharta¹⁵ raised the issue of duplications with the Good Shepherd Sisters,¹⁶ however, the order refused to answer any questions on the issue. It emerged subsequently that the Good Shepherds had amended the gravestone at St. Joseph's Cemetery, with asterisks noting that three of the women were buried at Sundays Well (see Fig 1).¹⁷ However, this amendment does not address the significant gap which

¹⁰ Such as gravestones, digitised census records, electoral records, graveyard registers, death certificates, inquest records, exhumation records and newspaper archives.

¹¹ To date, the MNP has recorded the details of approximately 1,900 women who died in Magdalene institutions across the Republic of Ireland. See: <https://jfmresearch.com/home/magdalene-names-project/>.

¹² JFMR gratefully acknowledges the assistance of Fiona Ward in locating this grave and providing us with photographs which were invaluable in identifying the women who are buried at the site.

¹³ See: <http://www.cbsnews.com/videos/magdalen-laundries-women-confined-in-convents/>.

¹⁴ Produced by France 3/Sunset Presse, 1998.

¹⁵ Then a journalist with the *Irish Examiner* newspaper.

¹⁶ See: <https://www.irishexaminer.com/news/arid-20221538.html>.

¹⁷ See: <https://www.irishexaminer.com/news/arid-20222402.html>.

indicates that far more than thirty women are buried at the Sundays Well Magdalene grave.

Fig 1: Good Shepherd Headstone at St Joseph's Cemetery, Cork.



Since access to the Magdalene graveyard is currently obstructed, JFMR welcomes the developer's plans to construct an accessible public pathway to the Magdalene graveyard from the Bake House at the opposite end of the site, and a further pathway along the western boundary.¹⁸ However, as demonstrated above, the headstones at the cemetery contain gaps and inaccuracies, which means that an unknown number of women are excluded from the grave markers at Sundays Well. Relatives of women who died in Magdalene Laundries frequently approach JFMR, seeking to reclaim their kin. **Because of the above stated omissions, family members of women buried at Sundays Well have no way of knowing that their relative is interred at the site.**

JFMR recognises that it is beyond the immediate power of the developer to rectify errors on the headstones at the Magdalene graveyard. **However, if An Coimisiún Pleanála**

¹⁸ Butler Cammoranesi Architects (2025) *Architects Design Statement*, pp. 8, 35. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

decides to grant permission for this development, JFMR asks ACP to place a condition that requires the developer to employ a suitably qualified university-affiliated researcher with experience in this area to conduct ethically-approved research to determine the identities of those women buried in this grave, including correspondence with the Good Shepherd Order for their assistance in accessing the relevant files they hold.

3.2 Condition of the Magdalene Graveyard

As noted in the developer's *Conservation Report*, both the Magdalene graveyard and the nuns' cemetery are currently overgrown, and the memorial cross erected in the Magdalene cemetery in memory of the women is broken.¹⁹ The *Architects Design Statement* indicates that:

The nuns' cemetery to the northeast of the site, in which Ellen Organ's (Little Nellie) grave is located, will be retained including all existing grave markers and monuments. Access will be provided to this cemetery for both residents and visitors to the site. A landscaped zone will be maintained in the vicinity of the graveyard to provide a contemplative area for residents and visitors.²⁰

The [religious sisters'] cemetery, which includes the grave of 'Little Nellie,' will remain untouched but its surroundings will be enhanced. Access will now be fully inclusive, including for those with disabilities. Improvements include a traditional Lime tree allée, grass terraces, seating, and better visual connections with the city.²¹

JFMR recognises the place that Ellen Organ/Little Nellie holds in the hearts of the people of Cork, and we agree that her final resting place should be accessible. However, no similar enhancements are planned for the Magdalene graveyard. Thus, while much-needed access to the Magdalene burial ground is proposed under this development, **unless State authorities ensure otherwise, visitors to the cemetery—including**

¹⁹ JCA Architects (2025) *Conservation Report*, pp. 27-28. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

²⁰ Butler Cammoranesi Architects (2025) *Architects Design Statement*, p. 8. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

²¹ Butler Cammoranesi Architects (2025) *Architects Design Statement*, p. 34. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

relatives of the deceased—will encounter an overgrown, neglected burial ground with no accurate record of the human remains buried therein. As the archaeologist Maurice Hurley put it in relation to a proposed development at Sundays Well in 2017, which envisaged access to the religious sisters' cemetery but not the Magdalene graveyard:

The enhancement of access to the Nuns Graveyard (with the boundary) cannot be presented as a '*slight positive impact*' ... while dismissing the adjoining Magdalene burial ground to the northwest as '*outside the development boundary*' **without inadvertently endorsing the concept that one is more important than the other.**²²

Similarly, the new development's proposed enhancement of the religious sisters' burial ground, while leaving the Magdalene cemetery in a state of disrepair, reinforces the marginalisation of these women and girls.

Furthermore, the *Architects Design Statement* states that the developer plans to '[r]etain and refurbish the ... Coach House and Bake House buildings', to include an 'exhibit space' which will 'display information relating to the site's history as an orphanage and Magdalen laundry and place of burial for Little Nellie'.²³ The *Design Statement* envisages that an 'accessible path' and a 'contemplative garden' 'for residents and visitors' will be located between the Bake House and the nuns' graveyard to the northeast of the development.²⁴ **Put simply, the developer plans to connect spaces intended to acknowledge the abusive history of Sundays Well with the final burial place of members of the religious order who perpetrated these abuses. This proposal is unethical, insensitive to survivors, affected people and family members, and further marginalises the Magdalene women and girls buried at the opposite end of the site. We urge ACP to place a condition that requires the developer to revise this**

²² Hurley, M. (n.d.) *Evaluation of Chapter 12, Archaeological Heritage*, emphasis in bold added. Available at: <https://planning.corkcity.ie/AppFileRefDetails/1737279/0>.

²³ Butler Cammoranesi Architects (2025) *Architects Design Statement*, p. 16. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

²⁴ Butler Cammoranesi Architects (2025) *Architects Design Statement*, pp. 8, 16, 34-35. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

element of the proposed development of the site appropriately and in consultation with the Special Advocate for Survivors.

We acknowledge that the Magdalene graveyard is outside the boundaries of the development, and therefore the repair and upkeep of this cemetery are not the direct responsibility of the developer. **Nevertheless, considering the grave human rights abuses committed at Sundays Well, JFMR contends that the developer is obligated to ensure that this development does not commit further injustices. Therefore, we ask ACP to place a condition that requires the developer to carry out repairs and ensure that the Magdalene graveyard is maintained to the highest possible standard.**

3.3 Access to the Magdalene Graveyard

As stated above, JFMR welcomes the developer's plans to ensure access to the Magdalene graveyard. In this regard, the *Traffic and Transportation Assessment (TTA)* indicates that '[t]he graveyard and Bake House heritage display will be fully accessible during the day'.²⁵ The *TTA* does not specify which graveyard it is referring to, however, since the Bake House and the religious sisters' cemetery are on the same side of the site, it is reasonable to assume that this is the burial ground in question. The *TTA* also indicates that: '[i]f someone requires special vehicular access (i.e. to the graveyard), security will make provision for this'.²⁶ Again, the *TTA* does not specify which graveyard it is referring to.

In light of these factors, JFMR asks ACP to place a condition that requires the developer to ensure that equal levels of access are guaranteed to both the Magdalene graveyard and that of Ellen Organ and the religious sisters. Additionally, we ask ACP to place a further condition that requires the developer and the company managing the site to ensure that information regarding access to

²⁵ MHL & Associates Ltd (2025) *Traffic and Transportation Assessment*, p. 27. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

²⁶ MHL & Associates Ltd (2025) *Traffic and Transportation Assessment*, p. 27. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

the Magdalene graveyard (including special vehicular access) is provided in Plain English at the entrance to the site, on the website associated with the development, and to the Special Advocate for Survivors so that it can be made available to survivors, affected people and family members.

4. UNDOCUMENTED BURIALS

JFMR notes a CCC *Planning Report* of 20th June 2025, which maintains there is 'credible concern that unmarked graves may exist on site and a full archaeological assessment is required'.²⁷ Furthermore, the *Report* asserts that the '[a]rchaeologic Assessment provide[d by the developer] is generic and downplays significance [of the site]'. However, the City Archaeologist's *Archaeology Report* of 18th June 2025 takes a different position. This *Report* argues that the archaeological testing conducted in 2017, undertaken for a previous application for development of the site, 'provided no evidence for the presence of previously undocumented burials'.²⁸ According to the City Archaeologist:

At every stage in this process the work conducted was with a sense of respect for the memory of those who lived, existed and died at the site, and was to the highest ethical standards of conduct. Every reasonably [sic] practicable effort that could be employed to test for the potential of previously undocumented burials at this site was employed.²⁹

As a result, the *Archaeology Report* takes the view that any concerns regarding undocumented burials 'can be resolved through a further programme of mitigating i.e. monitoring of groundworks works at the site'.³⁰

JFMR acknowledges that both the *Archaeology Report* and the permission granted by CCC place several conditions on the developer in the event that human remains are

²⁷ Foley, M. (2025) *Planners Report*, 20th June, 2025, p. 29. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

²⁸ Brett, C. (2025) *Archaeology Report*, p. 3. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

²⁹ Brett, C. (2025) *Archaeology Report*, p. 3. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

³⁰ Brett, C. (2025) *Archaeology Report*, p.2-3. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

discovered during construction.³¹ **However, the *Archaeology Report* and the corresponding CCC planning condition requiring the retention of services from a 'suitably qualified archaeologist' are excessively vague on the subject of locating human remains.**³² Indeed, the stated reason for this condition makes no reference to the possibility of undocumented burials: 'To ensure the continued preservation (either in situ of [sic] by record) of features and finds of archaeological significance'.³³

Over the past two decades, there has been significant ambiguity and concern surrounding the burial location(s) of the children who died at Sundays Well. Therefore, although it is not our immediate area of expertise, JFMR has carried out partial research on burial registers for St Joseph's Cemetery which are available online.³⁴ From this research, JFMR believes that, with the exception of Ellen Organ,³⁵ it is likely that many of the children who died in the Industrial School at Sundays Well are buried at St Joseph's Cemetery in Cork. **However, we must emphasise that our research is incomplete, not least because registers after 1917 are not available online. Thus, we cannot say that all the children who died at Sundays Well have been accounted for.** Additionally, it is important to note that we have been unable to locate death certificates for many of the children we located in the St Joseph's registers, which is a further indication of the deficiencies in the Good Shepherds' record-keeping.

Taking into account: (i) the history of the site and the gross human rights violations committed therein; (ii) the Good Shepherds Sisters' poor record-keeping practices

³¹ Brett, C. (2025) *Archaeology Report*, p5; Cork City Council (2025) *Notification of Decision to Grant*, 23rd June 2025, Condition 7. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

³² Brett, C. (2025) *Archaeology Report*, p. 5-6; Cork City Council (2025) *Notification of Decision to Grant*, 23rd June 2025, Condition 9. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

³³ Brett, C. (2025) *Archaeology Report*, p. 5-6; Cork City Council (2025) *Notification of Decision to Grant*, 23rd June 2025, Condition 9. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

³⁴ See: <https://publications.corkarchives.ie/view/528434043/>.

³⁵ Ellen Organ was initially buried in St Joseph's Cemetery, but her remains were relocated to the religious sisters' graveyard nineteen months after her death. See: <https://www.dib.ie/biography/organ-nellie-a7120>. Ellen's original burial record is available here: <https://publications.corkarchives.ie/view/528434043/1400>.

(discussed further in **Section 5**); and, (iii) the significant discrepancies and gaps on the headstones at the Magdalene graveyard—**JFMR contends that unless the burial location(s) of all those who died at Sundays Well is established conclusively prior to the commencement of any construction activities, State authorities run the risk of allowing uncertainty to prevail regarding whether they have sanctioned the construction of a major development at the site of an unknown number of undocumented burials.**

In light of the above factors, JFMR urges ACP to place a condition requiring the developer to engage the services of a suitably qualified university-affiliated researcher with experience in this area to conduct ethically-approved research to ascertain (i) how many women and children died at Sundays Well; and (ii) where they are buried, by forensically consulting the civil registration records and the burial registers of public cemeteries in Cork (beginning with St Joseph's), and by corresponding with the Good Shepherd Order. This condition should be met before any construction is allowed to take place.

Additionally, after the above condition is met, and if construction is allowed to proceed, JFMR asks ACP to place a positive obligation on the developer to ensure that rigorous, forensic, victim-centred archaeological methods are mobilised at Sundays Well, to establish beyond doubt whether undocumented burials are present at the site.

5. ARTEFACTS AND ARCHIVAL MATERIALS AT THE SUNDAYS WELL SITE

JFMR is concerned that the City *Archaeology Report* agrees with the developer's Environmental Impact Assessment which states that 'the archaeological potential of the site is very low'.³⁶ These concerns are reinforced further by the *Report's* contention that:

The results of the archaeological testing in 2017 gave a clear indication of considerable site clearance and levelling to facilitate construction of the convent

³⁶

Brett, C. (2025) *Archaeology Report*, p.2. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

in the 19th century. Indicators of potential interest in the GPR were of non-archaeological origin.³⁷

While the 'site clearance and levelling' that took place during the nineteenth century may have been 'considerable', the *Archaeology Report* does not acknowledge the possibility that **twentieth-century artefacts and other items of substantial social and historical value may be present at the site.** Significantly, the City Archaeologist's position does not appear to consider **what artefacts may be of importance to survivors and affected people.** Indeed, JFMR has seen evidence that records and artefacts remain at the site. For example, when the late Mary Raftery and her co-producer Sheila Ahern were filming the *States of Fear* documentary at Sundays Well, they discovered an accounts ledger relating to the Magdalene Laundry.³⁸

Additionally, during a short visit to the Sundays Well site in recent years, members of JFMR found a number of (non-personal) administrative records and artefacts relating to the institution (see examples at **Figs 2, 3 and 4**).³⁹ In light of these factors, the possibility of there being further documentation and artefacts at the Sundays Well site cannot and should not be ruled out.

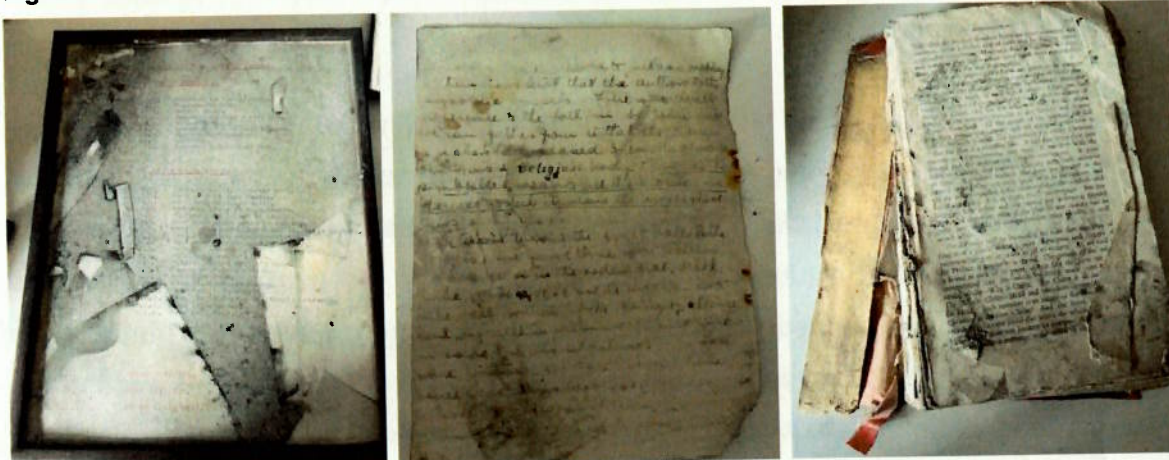
Therefore, we ask ACP to impose a condition requiring the developer to actively search for documentation and artefacts at the site, and in the event that such documentation and artefacts are discovered, that they be immediately given to the National Museum of Ireland so that they can be preserved in the National Centre for Research and Remembrance.

³⁷ Brett, C. (2025) *Archaeology Report*, p. 3, emphasis added. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

³⁸ https://adoption.ie/press-releases/pr_15-10-24/

³⁹ These artefacts and records will be donated to the National Centre for Research and Remembrance.

Figs 2-4: Records and artefacts found at Sundays Well



6. MEMORIALISATION

The *Architects Design Statement* states that the developer plans to '[r]etain and refurbish the ... Coach House and Bake House buildings', to include an 'exhibit space' which will 'display information relating to the site's history as an orphanage and Magdalen laundry and place of burial for Little Nellie'.⁴⁰ However, as one *CCC Planners Report* observes:

[The application] fails to respect or even acknowledge the historical, cultural and ethical significance of the site ... There is no substantive memorial plan, interpretive strategy or dedicated cultural or community space to acknowledge the human suffering associated with the site, which includes a former Magdalene laundry, industrial school and reformatory.⁴¹

This submission demonstrates that the developer has an insufficient grasp of the history of the site. **Thus, JFMR asks ACP to place a condition requiring the developer to conduct robust consultations with those most affected to ensure that the history of the site is acknowledged sensitively and ethically. The developer should also be required to liaise with the Special Advocate for Survivors regarding the design of the consultation.**

⁴⁰ Butler Cammoranesi Architects (2025) *Architects Design Statement*, p. 16. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

⁴¹ Foley, M. (2025) *Planners Report*, 20th June, 2025, p. 29. Available at: <https://planning.corkcity.ie/AppFileRefDetails/2543847/0>.

In March 2022, the Government approved proposals for a National Centre for Research and Remembrance (NCRR) at the site of the former Magdalene Laundry in Sean McDermott Street in Dublin.⁴² While the NCRR will 'physically situated in Dublin', the Government has promised that the Centre:

... will be accessible for all survivors, whether in other parts of Ireland or abroad. It will provide digital access to records and exhibits, as well as developing physical presences elsewhere to enable survivors to visit more easily.⁴³

JFMR contends that the Bake House exhibit space at the proposed development presents an opportunity for the NCRR to establish a physical presence at Sundays Well, either as a satellite of the NCRR or an exhibition space. We see this as especially appropriate in light of the development's intended use as student accommodation. **We ask ACP to place a condition requiring the developer to liaise with the NCRR Steering Group with a view to making the Bake House at Sundays Well available to the Centre. We ask ACP to place a further condition that requires the developer to liaise directly with the Special Advocate for Survivors regarding any memorials or exhibits to ensure that the views of survivors, affected people and family members are taken into account.**

⁴² See: <https://www.gov.ie/en/press-release/bab42-government-approves-proposals-for-a-national-centre-for-research-and-remembrance/>.

⁴³ See: <https://www.gov.ie/ga/an-roinn-leana%c3%ad-m%c3%adchumais-agus-comhionannais/preaseisiuinti/government-approves-proposals-for-a-national-centre-for-research-and-remembrance/>.

