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**LARGE RESIDENTIAL  
DEVELOPMENT  
CORRESPONDENCE FORM**

Appeal No: ACP 323082-25

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Amendments/Comments	<u>applicant's response to appeal</u>

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Deire.

## Catherine Flynn

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**From:** Cailin McNamee <cmcnamee@mhplanning.ie>  
**Sent:** Friday 15 August 2025 13:25  
**To:** Appeals2  
**Subject:** ACP Ref No. 323082  
**Attachments:** LTR\_250724\_Response to third party\_Final.pdf

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Good afternoon,

We act on behalf of Bellmount Good Shepherd Ltd. and wish to respond to the 4 third-party appeals lodged by Tom Coleman on behalf of Blarney Street & Surrounding Areas Community Association Ltd, Jurek Kirakowski, Tara Vernon with Ruth Gamble, Susanne Gamble, and Eoin Gamble, and Martin Krasa against Cork City Council's notification of a decision to grant planning permission for a Large Scale Residential Development comprising the construction of 274 student accommodation apartments along with all associated site works at the Former Good Shepherd Convent, Convent Avenue and Buckston Hill, Sundays Well, Cork (Cork City Council Ref No. 25/43847).

We trust that this submission will be considered in the Coimisiún's assessment of the proposed development. Please contact the undersigned if you require any further information.

Kind Regards,  
Cailin

Cailin McNamee  
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McCutcheon Halley  
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The Secretary,  
An Coimisiún Pleanála,  
64 Marlborough Street,  
Dublin 1.

15 August 2025

**Re: An Coimisiún Pleanála Ref. ACP 323082. Response to Third Party Appeals against Cork City Council's decision to grant permission for the following Large Scale Residential Development (LRD) comprising the construction of 274 student accommodation apartments along with all associated site works at the Former Good Shepherd Convent, Convent Avenue and Buckston Hill, Sundays Well, Cork.**

Dear Sir/Madam,

We act on behalf of Bellmount Good Shepherd Ltd. and wish to respond to the four third-party appeals lodged by Blarney Street & Surrounding Areas Community Association Ltd, Jurek Kirakowski, Tara Vernon, Ruth Gamble, Susanne Gamble, and Eoin Gamble, and Martin Krasa against Cork City Council's decision to grant planning permission for a Large Scale Residential Development comprising the construction of 274 student accommodation apartments along with all associated site works at the Former Good Shepherd Convent, Convent Avenue and Buckston Hill, Sundays Well, Cork (Cork City Council Ref No. 25/43847).

An Coimisiún Pleanála (ACP) will note that the grounds of appeal repeat many of the issues raised by the appellants during the planning application process and have little regard to the balanced assessment of these concerns carried out by the Planning Authority. It is submitted that all issues for the LRD application were very carefully considered and addressed by the planning authority in making their decision to grant permission.

In considering this appeal, it is important to point out that the application was accompanied by a detailed and comprehensive set of supporting plans/materials and the Council's decision to grant permission was the culmination of a detailed assessment of all planning matters relevant to the development. The final decision underlines that all identified issues have been addressed.

Despite our reservations regarding the recurring nature of the issues raised in the third-party appeal, we have summarised the items raised in the appeal below and will respond as follows:

- 1. The proposed development is fully in accordance with Government Policy and the Cork City Development Plan 2022 and does not materially contravene the plan.**
- 2. The proposed development will not seriously injure the residential amenities of properties in the vicinity, the history associated with the Good Shepherd Convent or the Landscape Preservation Area and will enhance the Sundays Well area.**
- 3. The proposed development will not give rise to any adverse traffic or road safety issues.**
- 4. The planning application was accompanied by a very comprehensive list of supporting material which was prepared to a high standard and contains all the information required/sought by the planning authority.**



Our response to the grounds of appeal is outlined below.

## Grounds of Appeal

### **1. The proposed development is fully in accordance with Government Policy and the Cork City Development Plan 2022 and does not materially contravene the plan.**

A number of appellants make reference to the proposed development not being in line with the relevant policies. Martin Krasa states that the choice to approve Buxton Hill as an access point *“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.”*

The planners report states that *“it is acknowledged that Buxton Hill does not have any dedicated footpaths, however the nature of the street is that cars and pedestrians share the available space in a safe and collaborative fashion very similar to a designated shared street”*, with Condition 3 outlining that *“the pedestrian access point onto Buxton Hill shall be opened to all pedestrians/cyclists with similar access controls as presented at the other entrances to the development site”*.

Objective 4.5 of the Cork City Development Plan states the following:

*“a. All new development, particularly alongside the possible routes identified for public transport improvements, shall include permeability for pedestrians, cyclists, and public transport so as to maximise its accessibility.*

*b. To maximise permeability, safety, security and connectivity for pedestrians and cyclists by creating direct links to adjacent roads and public transport networks in accordance with the provisions of statutory guidance as prescribed.”*

It is not within the applicants remit to ensure any road improvements within the wider area are completed prior to them submitting an application for development. The proposed development will utilise 2 no. access points maximising permeability and connectivity, allowing pedestrian and cyclist traffic to be evenly dispersed throughout the site and surrounding area.

By opening a pedestrian/cyclist access point at Buxton Hill, the development will connect to the existing urban fabric, enhancing the overall network integration for active travel modes which is line with the Cork City Development Plan. The planners report acknowledges that Buxton Hill acts as a designated shared street due to the existing character, therefore Buxton Hill already supports the safe and collaborative use of the street by both pedestrians and vehicles, aligning with the principles of in the Cork City Development Plan.

Martin Krasa also states that the proposed development fails to comply with objectives in the Cork City Development Plan relating to promoting walkable, safe and inclusive neighbourhoods, ensuring the development does not generate traffic beyond what the infrastructure can safely handle and to develop streets that are accessible, legible and universally usable. We strongly disagree with this.

The proposed layout of the development has been designed to create a walkable, safe and inclusive neighbourhood through a number of measures including limited car parking spaces, designated footpath networks, shared spaces and traffic speed controls. These design measures facilitate secure movement for pedestrians and cyclists allowing for easy navigation while promoting the use of sustainable commuting choices. This is reflected in the robust set of architectural drawings prepared by Butler Cammoranesi Architects which showcase how the development delivers compact growth that is integrated within the surrounding community and provides for a walkable neighbourhood which is line with Objective 2.14 of the Cork City Development Plan which relates to ‘walkable neighbourhoods’ and



outlines that new developments shall be designed to create attractive, safe and vibrant places with active streets.

The site supports legible and universally accessible streets through a comprehensive network of pedestrian and cycle routes throughout the site. In addition, the proposal will provide improved connectivity outside the development with upgrades works along Convent Avenue, including a new pedestrian crossing located at the site entrance and footpath and pedestrian crossing facilities located at the junction of Convent Avenue/Sunday's Well Road. These design measures will allow the proposed development to promote walkable, safe and inclusive neighbourhood. The internal street network and external street upgrades have been designed in line with universal design principles, ensuring that people of all ages and abilities can easily navigate the proposed development.

The proposed development will offer a total of 37 no. car parking spaces which is below the maximum parking standards outlined in the Cork City Development Plan. The limited car parking spaces ensures that the future residents will adopt sustainable commuting choices, therefore reducing the potential for the proposed development to contribute to vehicular traffic on the surrounding street network.

The Traffic: Regulations and Safety Report, completed by Cork City Council, is in agreement and states that the proposed development *"is likely to generate low volumes of traffic as the design and location of the proposed development is focused towards encouraging access by sustainable and active travel modes"* and that additional traffic attributable at the Junction of Sunday's Well/Shanakiel Road *"is very modest at an approximate 2% increase in traffic flows during peak periods."*

It is clear from the design approach and the opinion of planner and transport officer that the proposed development will not negatively impact the surrounding environment.

Tara Vernon and others state that *"the development would result in the removal of mature trees currently located on the site, in direct contradiction to preservation guidelines and the sites designated landscape preservation zone."*

A portion of the site is zoned under ZO 17 with the objective *"to preserve and enhance the special landscape and visual character of Landscape Preservation Zones"* and with the site-specific objective *"to provide landscape structure and open space in any redevelopment."*

The landscape strategy for the site prepared by Forestbird Design focuses on enhancing and retaining the existing landscape character in line with the Cork City Development Plan and proposes a sensitive approach to ensure that the existing landscape features remain a prominent feature of this development.

Forestbird Design outlined in their strategy that tree protection is critical component of the construction phase and provides zones of protection as seen below in Figure 1.



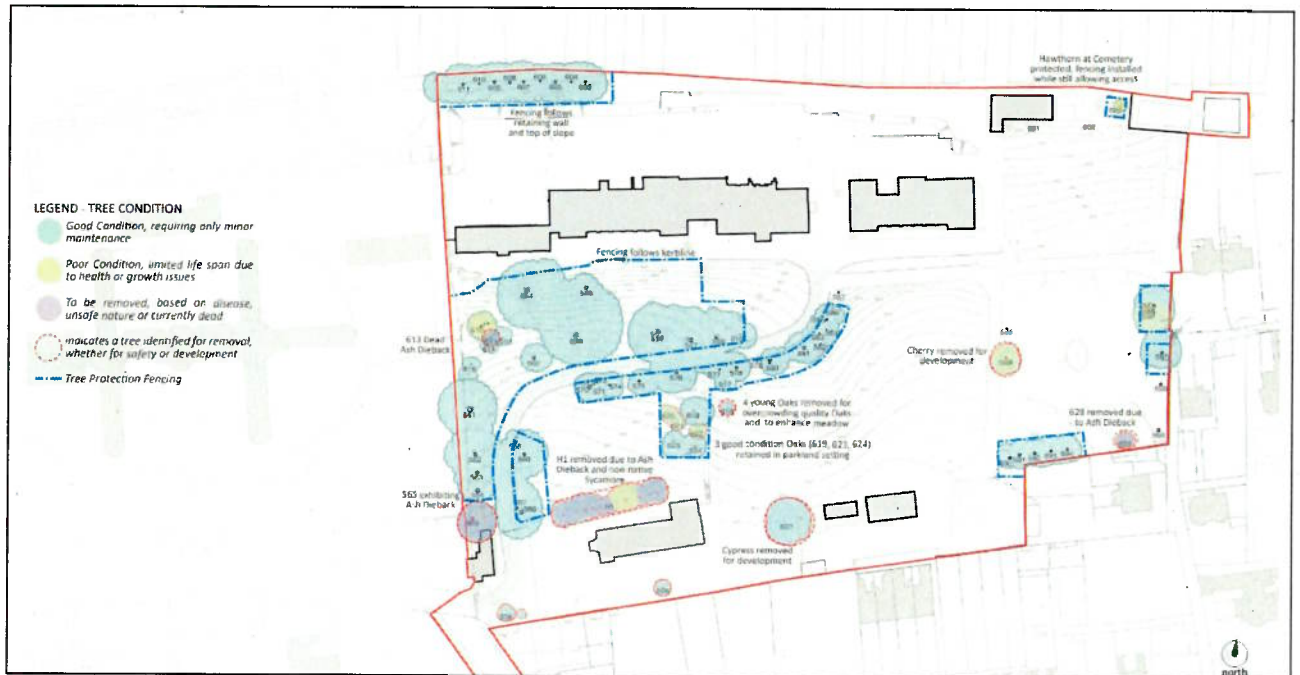


Figure 1 Drawing Outlining Tree Protection/ Removals prepared by Forestbird Design

Forestbird Design identified several trees to be removed to prevent further impact from Ash Dieback disease. The site remaining unoccupied has led to the degradation of the landscape, with most trees onsite requiring intervention to reduce further damage, with maintenance intervention expanding the life expectancy of trees on site.

Cork City Council was in agreement with this landscape approach. The Planner's report states that the proposed development has "responded positively to the built heritage, social heritage and **landscape context** of the site" and that "the proposal is **designed to also accord with the 2017 Landscape Preservation Zone** which affects a large portion of the site."

Overall, we note that the removal and intervention of some trees is required in order to preserve and enhance the Landscape Preservation Zone as in line with the Cork City Development Plan.

We firmly believe that the proposed development is fully in accordance with the Cork City Development Plan, and the specific policies and objectives pertaining to the site, and we would therefore ask the Coimisiún to uphold the Council's decision to grant permission for the proposed development.

**2. The proposed development will not seriously injure the residential amenities of properties in the vicinity, the history associated with the Good Shepherd Convent or the Landscape Preservation Area and will enhance the Sundays Well area.**

The proposed development was very carefully conceived, right from the outset, to ensure that there would not be a negative impact on the local residential amenities, the Good Shepherd Convent or the Landscape Preservation Area designation. The design and layout was based on a comprehensive and robust appraisal to ensure that the scheme would be delivered and managed to a very high standard in order to protect the amenities of the area.

A number of appellants have raised concerns with noise levels as a result of the construction and operational phases of the development.



Tara Vernon and others raises concerns with noise pollution as a result of the construction phase stating that the *"prolonged disturbance poses a serious threat to residents well-being and community cohesion."*

Chapter 9 of the Environmental Impact Assessment Report (EIAR), assess the potential noise impact of the construction phase and outlines mitigation measures to ensure the impact is limited as much as possible. Once this mitigation measures are implemented, the construction phase is expected to have a slight to moderate, **temporary**, negative impact.

Cork City Council was in agreement with this assessment. The Planner's report states that *"it is considered that the disturbance caused during construction is temporary and detailed mitigation measures are set out as part of the EIAR."*

Martin Krasa outlines that the *"scale and duration of the works will result in sustained noise, dust, traffic congestion, construction vehicle movements and disruption to local access."* We disagree with this statement. A comprehensive Construction and Environmental Management Plan (CEMP) prepared by MMOS Engineers and a Construction Traffic Management Plan (CTMP) prepared by MHL Consulting Engineers were submitted with the application. Both these reports discuss in detail the potential impacts and provide mitigation measures to alleviate the potential impacts on existing residents.

The CEMP and CTMP were assessed by Cork City Council who raised no issues with its contents or proposals to deal with the above matters with the Traffic: Regulation and Safety Report stating that Cork City Council are satisfied with the technical input provided to substantiate findings of the assessment and *"there will be no unacceptable impacts on the receiving road network during the construction phase."*

Tom Coleman on behalf of the Blarney Street & Surrounding Areas Community Association Ltd. has claimed that the number of students will *"likely result in increased, noise levels, particularly during evenings and weekends which would negatively impact the peaceful enjoyment of homes in the vicinity."* Jurek Kirakowski raises concerns outlining that the amount of noise and disturbance to the existing local population is of concern.

As outlined in Chapter 9 of the EIAR, it is intended to implement a noise management policy throughout the operational phase of the development in order to minimise any noise impact from the amenity areas. The noise management policy outlines the following measures:

- The external amenity area opening hours will be 07:00hrs to 23:00hrs with no activity at night except for circulation as required.
- Members of staff will conduct regular checks of the external area at all times. The area will also be subject to CCTV coverage. Coverage will operate for 24 hours with images retained for 30 days.
- Signage will be erected in the external area and by all exits to the premises to remind students of the need to respect the rights of our neighbours to the quiet enjoyment of their homes, businesses and other activities.
- If on occasion students are found to be making excessive noise a member of staff will take immediate action to rectify the situation, e.g. ask the student to talk more quietly or if problems persist, ask them to return inside the premises.
- A telephone number will be circulated to residents to allow any complaints as to noise from the premises or as to any other elements of its operation to be communicated easily.
- If any complaints of noise disturbance are received immediate steps will be taken to prevent a recurrence of the situation.
- The premises management will ensure that all residents and staff are made aware of the need to respect the rights of our neighbours to the quiet enjoyment of their homes, businesses and other activities.



- Regular residents' meetings will be convened unless it is apparent that attendance at such meetings means they may no longer be necessary. The meetings will allow any issues which arise from the operation of the premises to be discussed.

A number of appellants raised concerns regarding flood risk and geological instability, stating the use of impermeable surfaces will *"drastically reduce natural water absorption, significantly increasing surface water runoff and flood risk to surrounding lower-lying properties."* This is simply not true and deliberately ignores the detailed assessments completed as part of the application.

The Engineering Report prepared by MMOS Engineers assessed the flood risk of the site and concluded the proposed development will not increase the stormwater runoff rate and that the proposed development does not increase flood risk elsewhere. The residual risks of flooding can be managed through the incorporation of good building practice in design and construction of ground floor level and associated drainage systems. A number of Sustainable Urban Drainage measures will be utilised including Tree Pits to provide temporary attenuation, infiltration, and surface water cleaning with an overflow pipe back to the main surface water runs to prevent against flooding in scenarios where the tree pits are overwhelmed during periods of excessive rainfall. Blue and green roof configurations will also allow for effective stormwater management. Other measures include rainwater harvesting and rain garden/downpipe planters as well as an attenuation tank for the management of surface water.

Chapter 6 and Chapter 13 of the EIAR presents information on Hydrology and Hydrogeology and Built Services providing information on the control and management of surface water during the operational phase as well as surface water drainage infrastructure.

The drainage report prepared by the Senior Executive Engineer of Cork City Council stated that the control and management of surface water within the proposed development has been *"adequately addressed and where proposed, the mitigate measures are appropriate."*

Several appellants have expressed concerns that the proposed development would be out of character with the surrounding neighbourhood and could negatively impact social cohesion due to its use as student accommodation.

Martin Krasa states that the development would no longer be integrated into the neighbourhood, disconnecting from the surrounding community and altering the character, balance and liveability of the neighbourhood. We strongly disagree with this statement which suggests that the existing derelict, vacant site provides a better contribution to the area than the proposed development.

On the contrary, the introduction of a well-managed student accommodation development has the potential to positively contribute to the social and economic fabric of the neighbourhood. An increased student presence will provide valuable support to local businesses, including cafés, restaurants, supermarkets, and retail stores, stimulating job creation, encouraging business growth and promoting economic vitality. The demand from a student population can lead to the emergence of new services, extended opening hours and affordable offerings that will benefit students and local residents, fostering a more diverse and inclusive local economy.

Furthermore, the number of students generated by the proposed development will enhance the social vibrancy of the area, by helping to sustain amenities such as gyms, libraries, sports facilities, cinemas, and entertainment venues. This will help create a more active and engaging city for all residents.

Cork City Council agreed with this, and the assistant planner stated that she *is "satisfied that the scheme will be professionally managed, will support integration with the local community in terms of services and amenity space proposed and will effectively mitigate against any potential negative impacts on the surrounding residents in terms with the increase in population."*



Tara Vernon and others states that the proposed development is *“incompatible with the character of Sunday’s Well, a designated sustainable residential neighbourhood”* and that *“Sundays Well is not a designated student housing district and should not be subject to development that undermines its residential character.”*

Tom Coleman on behalf of the Blarney Street & Surrounding Areas Community Association Ltd. states that the development is out of character with the surrounding area with the scale and height being overbearing and inappropriate for the local context.

The site is zoned ZO 01 Sustainable Residential Neighbourhood, and the proposed development is in line with the Cork City Development Plan 2022 aims and objectives for this zoning, which seeks to *protect and provide for residential uses and amenities, local services and community, institutional, **educational** and civic uses.*

As evident from the robust and comprehensive architectural design package prepared by Butler Cammoranesi, great care has been taken to consider the local context and how the proposed development would contribute to the area. The development has been thoughtfully designed to integrate seamlessly with its surroundings, preserving the historic structures while introducing new residential accommodation in a way that will respect the scale and character of the surrounding environs. Medium-scale buildings extend from the existing built form, with the buildings following the natural slope of the land, ensuring a sensitive response to the site’s topography. The development contributes positively to the locality with key services and amenities including a café and a local commercial unit strategically placed to serve the neighbourhood which will aid in stimulating local economic activity and enhancing the variety of services in the area.

The architectural design enhances the local identity by incorporating high-quality materials and sensitive restorations. The layout makes optimal use of the existing buildings, landform, and ecological features, creating a memorable and cohesive urban environment that seamlessly integrates with its surroundings. This is reflected in Cork City Council’s Architect’s report which states *“we feel that the scheme generally presents an appropriate scale to the surrounding residential area”* and the Council’s Planner’s report which states that *“given the size of the site, that permission has previously been granted for development with similar heights, the previous institutional use with remaining structures on site of 5 storeys, the parkland setting and the outcome of the visual impact assessment. It is considered that subject to further assessment on the impact of the height on the residential, that the height is appropriate and can be supported.”*

Tom Coleman on behalf of the Blarney Street & Surrounding Areas Community Association Ltd. further suggests that the proposed development *“will do nothing to enhance the quality of life of the area.”* We strongly disagree with this statement. The existing situation is that the site has remained in disrepair for years, with the degradation of the protected structures and the associated landscape. This has resulted in the site becoming a serious health and safety concern to the surrounding residents as is evident with the number of fires that have taken place on site throughout the years, further diminishing the architectural and heritage significance. By introducing a student accommodation development, this will offer a unique opportunity for revitalisation and deliver a thoughtfully designed scheme that acknowledges and respects the sites historic character, while in turn creating a liveable neighbourhood with an array of amenities, and open space that will provide community benefit.

A number of appellants raised concerns with the impact the proposed development will have on local services and infrastructure with Tom Coleman on behalf of the Blarney Street & Surrounding Areas Community Association Ltd. stating that *“an influx of students could put additional pressure on local services and infrastructure such as public transport, waste collection and health services which are already under strain”* and will *“negatively impact on the community and its limited commercial services.”* Tara Vernon and others state that the *“proposal fails to provide the corresponding infrastructure or community amenities necessary to support this population increase.”*



The proposed development is within walking distance to Cork City Centre which provides ample commercial services, with a commercial unit proposed for the subject site to aid in providing more localised services. Chapter 4 of the EIAR identifies the range of local community services and facilities available within a short distance of the site that will cater for the site's future population.

A comprehensive Mobility Management Plan (MMP) prepared by MHL Consulting Engineers provides a detailed assessment of the existing public transport, cycle and pedestrian infrastructure in the area.

The MMP highlights that a high proportion of local residents are active commuters and utilise walking and cycling as their mode of transport, indicating that this site is very accessible and is therefore a very appropriate location for student accommodation. It was noted that only 4% of the local resident's avail of public transport as a means of travel to work, school and college, which suggests a significant unused capacity in the existing network that can readily accommodate future residents of the proposed development.

There are planned infrastructure improvements such as the Shanakiel - Strawberry Hill pedestrian improvement scheme which will deliver a range of improvements in the area. In addition, BusConnects will introduce new bus routes and improved bus frequencies to transform the public transport network so that anticipated growth and future demand in the region are met.

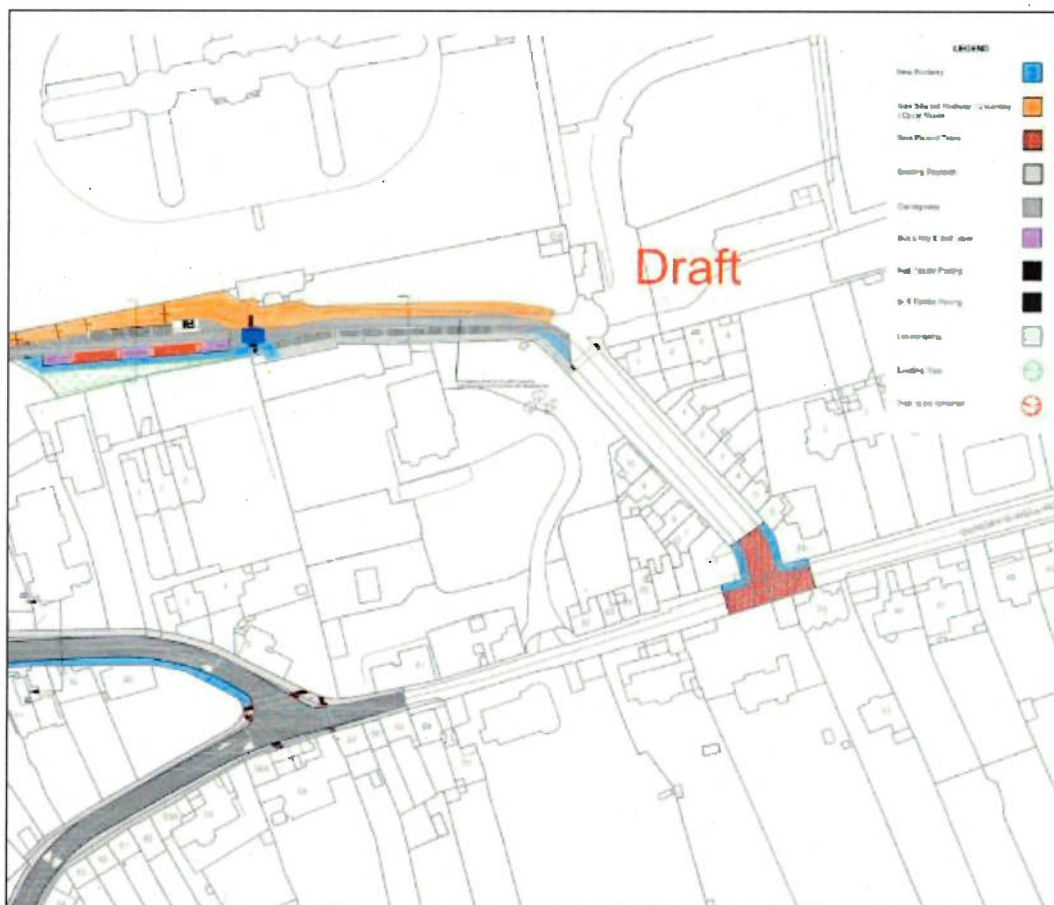


Figure 2 Shanakiel - Strawberry Hill Pedestrian Improvement Scheme



Through planned improvements for pedestrian and cycle facilities along with the availability and planned expansion of public transport services, achieving an appropriate, sustainable modal split is entirely attainable.

Furthermore, a growing student population will encourage improvements in public transport services, leading to more frequent buses and extended routes. This will benefit not just students but also local residents, making travel around the city more efficient and accessible.

A number of appellants raised concerns with issues relating to overlooking, loss of privacy and daylight. Tara Vernon and others state that the scale and positioning of the proposed development will *"result in significant overlooking of adjacent properties, constituting an unacceptable invasion of privacy."*

A detailed Daylight, Sunlight and Overshadowing Study was prepared by IES and concludes that *"based on the results from each of the assessments undertaken, the proposed development performs well when compared to the recommendations in the BRE Guide 3rd Edition and BS EN 17037-2018+A1-2021 National Annex. With regards to the existing properties there is a minor to negligible impact when considering sunlight and daylight as a result of the proposed development and the proposed development itself performs very well with the same regard."*

The proposed development has been carefully designed in accordance with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024 which includes compliance with recommended separation distances.

In addition, several mitigating design measures have been incorporated to address potential impacts. The sites existing topography and level differences allows the development to naturally reduce visual intrusion concerns. Strategic landscaping, including the planting of screening vegetation will further negate privacy and overlooking concerns. The orientation and layout of the proposed blocks have been carefully considered with opaque windows where appropriate implemented to preserve privacy. These design interventions ensure that the proposed development will not result in any unacceptable impact on adjoining properties in relation to overlooking, privacy and daylight access.

It is clear from the submitted documents that the proposed development will not have a negative impact on the sunlight and daylight enjoyed by or the privacy of the surrounding properties. This is acknowledged in the Cork City Council's Planner's report which includes an assessment on the potential impacts to surrounding properties and states that subject to conditions, *"the proposed development will not have any undue impacts upon the amenity of residents."*





Figure 3 Extract from Site Layout by Butler Cammorensi

The appellants raise concern for the historical and sensitive significance of the Good Shepherd Convent stating that a proposal for this site *“demands a restrained, commemorative, and contextually respectful planning response.”* Tara Vernon and others state *“It is imperative that the horrors that occurred within this complex, and the lives thwarted and silenced there be acknowledged, honoured and recognised.”* Martin Krassa states that this site *“requires sensitive redevelopment”* and that a grant of permission for high density student accommodation *“effectively erases this critical layer of our social history.”*

The Good Shepherd Convents complex history has been dealt with extensively in this application through qualified experts who have undertaken all necessary assessments. The design team have worked closely with Cork City Council to deliver a proposed development that not only respects the sites sensitive historical significance but also pays homage to its cultural heritage.

JCA Architects have undertaken historical analysis and physical inspection of the buildings to enable the character of the historic buildings to be identified, and the potential risks determined - summarised and compiled in the Matrix of Significance. The analysis of the site has informed the design team’s understanding of the significance of the existing former Good Shepherd Convent buildings and allowed the formulation of mitigation measures to help to protect the special character of these buildings and their setting within an Architectural Conservation Area.

Due to the architectural and historical significance of the Good Shepherd buildings, and their location within an Architectural Conservation Area, the primary surviving elements of the main three buildings will be retained and restored. The Coach House and Bake House buildings will be retained and refurbished to provide additional amenity space for resident use as well as being used as exhibit space to display information relating to the site’s history as an orphanage and Magdalene laundry. This historic building will also house interpretive elements providing insight into the history of the convent.



The architectural design enhances local identity by incorporating high-quality materials and sensitive restorations. The layout makes optimal use of the existing buildings, landform, and ecological features, creating a memorable and cohesive urban environment.

The 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 and will be open to the public. The existing ornamental fence line will be fully retained, and no modifications or works are proposed within the fenced cemetery boundary. The sloping hillside south of the cemetery will undergo landscape improvements, creating a clean, simple 'front garden' to the cemetery.

Tara Vernon and others reference the recently refused application for the former Bessborough Mother and Baby Home where the Coimisiún concluded that *"it would be premature to grant permission prior to determining the presence and extent of any burial ground and that the implications of such a discovery would directly affect the feasibility and delivery of the proposed development."*

We would like to note that the Good Shepherd Convent was not a Mother and Baby Home and operated as a Magdalene Laundry and Industrial School with its history outlined in Chapter 15 of the EIAR. The reference to the recent Bessborough Mother and Baby Home decision is not comparable to our application for development at the Good Shepherd Convent as they both served as different institutional function.

Furthermore, as outlined in Chapter 16 of the EIAR, a field survey, geophysical survey and targeted archaeological testing of the proposed development lands were carried out. The proposed programme of archaeological testing was primarily focused on identifying any possible undocumented burial places or graves within the proposed development areas of the development site. The testing revealed no artefacts, features, deposits or remains of archaeological or cultural significance.

The entire site has been extensively disturbed by past construction, reducing the likelihood of archaeological remains. Archaeological monitoring will be in place during construction in order to mitigate any residual undisturbed archaeological deposits and features that might survive within the development.

In considering that there is no credible archaeological evidence indicating the presence of unrecorded burial grounds on this site, the specific considerations that led An Coimisiún Pleanála to refuse to grant permission for the Bessborough Mother and Baby Home do not arise in this case and the precedent is not relevant in the determination of our application.

Tara Vernon and others states that *"the development would disrupt local wildlife habitats and natural green spaces, further compounding the environmental degradation."* We do not agree with this claim.

45% of the site is designated as green space, with no proposed development to be constructed within the designated Landscape Preservation Zone with biodiversity efforts focusing on connectivity and habitat enhancement, with key features such as 300m of urban woodland, linked meadows/ woodland edges, 2,000 sqm. of green roof space and defensive native planting.

It is clear from the submitted site layout plan that no development is proposed within the Landscape Preservation Zone and multiple measures have been included within the development to protect these areas as is detailed within the application documents.

Chapter 14 of the EIAR comprehensively assesses the biodiversity of the site with a series of site visits and specialist surveys carried out specifically for the proposed development. The multi-disciplinary surveys included terrestrial ecology and habitat surveys, invasive plant species surveys, bird surveys, bat surveys, and non-volant mammal surveys.



Further surveys are ongoing on site and will be taken into account during the construction of the proposed development. Please find enclosed a copy of Non-Volant Mammal Survey completed by Veon in June 2025, following the submission of the application. This survey was shared with Cork City Council and the Conservation Ranger in August 2025, and any further surveys will be shared once completed.

The Biodiversity EIAR chapter outlined mitigation measures to protect the ecology and biodiversity of the site. These include the timing of works to avoid impacts on sensitive ecological receptors, the implementation of water quality protection measures, and measures to prevent the spread of invasive species. Pre-construction surveys for mammals, birds, and bats will be conducted to ensure that any species present are identified and appropriately protected. Measures to minimise habitat loss and vegetation removal have been devised. Specific measures for the protection of non-volant mammals, bats, and breeding birds have also been developed. Lighting will be designed to avoid and minimise impacts on bats. In addition to mitigating the likely ecological effects of the proposed development, the biodiversity assessment also proposed a number of ecological enhancement measures aimed at having a positive impact on biodiversity wherever possible. These include the planting of native Irish tree, shrub, and wildflower species, as well as the installation of bat and bird boxes in suitable locations across the proposed development site.

For all Key Ecological Receptors, it was found that any residual effects, following the application of the proposed mitigation measures, would not be significant at any geographical scale. With the implementation of the mitigation measures outlined in the EIAR, there will be no significant residual effects on biodiversity within the zone of influence.

It can be concluded that the proposed development will not result in any adverse effects on the integrity of any ecological features. Following the construction of the proposed development, it should be possible to establish and maintain a range of biodiversity enhancement measures that utilise and enhance the existing ecological features within and surrounding the site.

Tara Vernon and others have expressed concerns that *“increased noise, diminished privacy, heightened security concerns, and the degradation of the visual environment are all likely to have a negative impact on surrounding property values.”* As detailed in this section of the report, the applicant has extensively dealt with issues concerning the above matters, providing a comprehensive and robust set of assessments which included mitigation measures where appropriate. Furthermore, the consideration of the value of surrounding properties is not within the remit of the planning process and should not impede the delivery of this much needed development.

Therefore, we would ask the Coimisiún to uphold Cork City Council's decision to grant permission as the proposed development will clearly not injure the residential amenities of properties in the vicinity, the history associated with the Good Shepherd Convent or the Landscape Preservation Area and overall, it will enhance the Sunday's Well area.

### **3. The proposed development will not give rise to any adverse traffic or road safety issues.**

The appellants have raised concerns with the proposed development not providing adequate car parking which they fear will result in overspill car parking along the surrounding residential streets leading to increased traffic congestion and reducing pedestrian and cyclist safety.

A Car Parking Management Strategy (CPMS) was prepared by MHL Consulting Engineers which demonstrates that the proposed car parking provision is entirely sustainable given the current car ownership and modal splits for the journey to work or education. The proposed car parking reflects the high level of walking, cycling, public bus services in the area and is suitable for day-to-day living at the location. The CPMS identifies both physical elements and strategies to be incorporated within the



proposed development to create a modal shift from private car use to more sustainable modes of transport including public transport, walking and cycling.

This approach was deemed suitable by Cork City Council and is reflected in the Senior Executive Transport Officer's report where he noted that *"the mobility needs of the residents will be accommodated via the existing transport infrastructure in the area which will be further supplemented with enhancement through the delivery of the transport infrastructure identified in the CMATS"* and that the *"limited 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"* and that the *"presence of on-street parking controls will ensure parking associated with the proposed development does not spill out onto the public road."*

We would like to make clear to the Coimisiún that a comprehensive Traffic and Transportation Assessment (TTA) by MHL Consulting Engineers was submitted with the application which assessed the impact of the proposed development on the surrounding road network. Furthermore, Chapter 12 of EIAR extensively assessed the potential impact of the proposed development in terms of traffic and transport.

The TTA concludes that the proposed development causes minimal impact on the analysed junctions and surrounding area. While the TTA acknowledges that there will be a slight projected increase in traffic it is likely to be maximum of 5% and will have limited traffic impacts on prevailing traffic conditions.

The TTA and Chapter 12 of the EIAR were assessed by the Senior Executive Transport Officer who stated in his report *"I am satisfied that the proposed development will not cause unacceptable operational traffic impacts in the short term and the delivery of the planning transport infrastructure as presented in the Cork Metropolitan Area Transport Strategy (CMATS) will enhance accessibility for the future residents of the proposed development."*

A number of appellants claim that the pedestrian and cycling traffic generated from the proposed development will severely impact congestion with the existing pedestrian infrastructure *"not fit for purpose"* and that the development fails to comply with DMURS and *"cannot safely accommodate the increased volume of residents, tourists, visitors and service vehicles"* generated from the proposed development. The appellants follow on from this stating that the area is *"already under significant infrastructural strain"* in relation to extremely narrow roads and footpaths and limited public transport access. We strongly disagree with these statements. We also note that it is not within the applicant's remit to ensure any road improvements within the wider area are completed prior to them submitting an application.

A DMURS Statement of compliance was prepared by MHL Consulting Engineers which outlines the approach taken in the design of the development and how it follows the guidance contained in DMURS both internally within the scheme and along Convent Avenue.

As already stated, the Mobility Management Plan outlines future planned improvement of cycling, pedestrian and public transport infrastructure for the area which are identified in the Cork City Development Plan and Cork Cycle Network Plan.

Cork City Council are currently preparing the Shanakiel – Strawberry Hill Pedestrian Improvement Scheme project which will deliver a new shared footway/cycleway along Convent Avenue, new footpath along the southern extent of Convent Avenue and new signalisation of the Shanakiel Road/Sunday's Well Road junction which will include controlled pedestrian crossings as well as a new footpath along the western extents of Shanakiel Road.

The delivery of these improvement works will see an overall improved accessibility to the area. The provision of additional pedestrian crossings and footpath build outs will promote a high level of pedestrian activity between the proposed development to Daly's Bridge.



In order to ensure a high level of accessibility to the proposed development by foot, the applicant has committed to providing infrastructural improvements including a new pedestrian crossing to the south of the development entrance, with the junction of Convent Avenue/Sunday's Well Road to be raised with footpath and pedestrian crossing facilities. These infrastructural improvements will provide a DMURS compliant design with upgrades to the footpath and road space resulting in significant improvement to road safety conditions, and aligning with the local authority upgrade works proposed for the area.

Therefore, we would ask the Coimisiún to uphold Cork City Council's decision to grant permission as the proposed development will not give rise to any adverse traffic impacts.

**4. The planning application was accompanied by a very comprehensive list of supporting material which was prepared to a high standard and contains all the information required/sought by the planning authority.**

Martin Krasa states that the planning application makes reference to population and student density figures *"derived from broad electoral areas expanding far beyond Sundays Well"* and do not reflect the specific characteristics of the Good Shepherd site and that the applicant *"has not provided a clear or transparent rationale for the selection of the study area used to assess demand, demographics or context."* Tara Vernon and others states that *"the EIAR fails to engage meaningfully with the scale and localised impact of the proposed development, nor does it sufficiently assess the capacity of surrounding services such as schools, healthcare, transport and green spaces."* This is not true.

As can be seen in Chapter 4 of the EIAR, a number of small areas, not electoral areas, as defined the CSO were used to capture the population of the surrounding area, which allows for a more accurate identification of demographic patterns. This area was chosen as it roughly reflects a 15-minute walking and cycling distance from the site, which was considered as it is in line with national objectives for a 15-minute neighbourhood.

The Cork City Council's Planner's report supports this approach and notes that the use of the Sundays Well Electoral Division, as suggested by the appellants, would not be appropriate as it is a *"relatively small geographic area and it is considered that focusing on such a small area is not appropriate, given the near city centre context of the site, surrounded by built up areas where supporting social infrastructure and services are readily available."*

Figures 4 and 5 below show the difference between the EIAR's chosen catchment area and the Sunday's Well EDs. It is clear from these images that the use of the Sunday's Well EDs would not have provided an appropriate assessment of the local area's population.



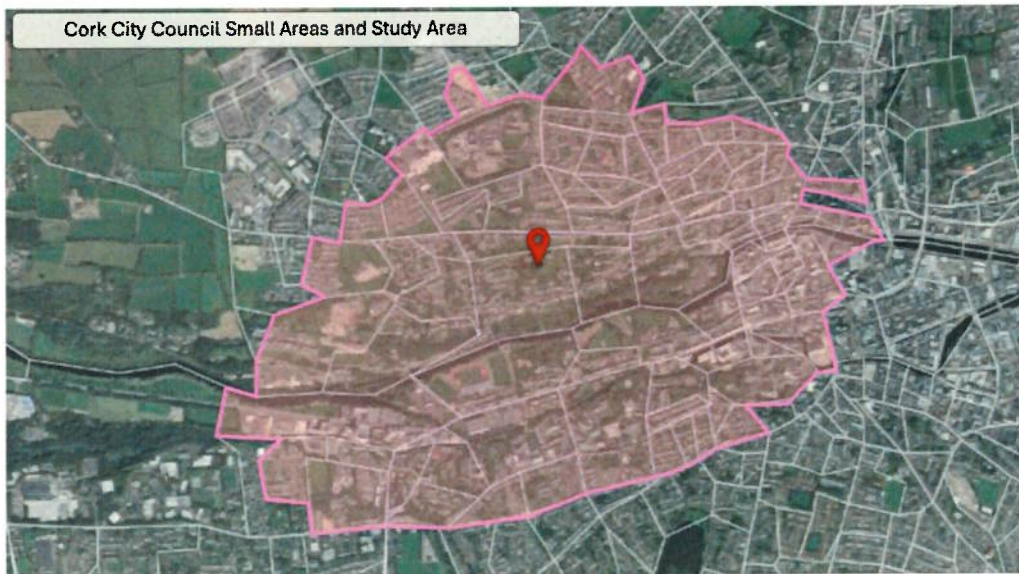


Figure 4 Small Areas selected for Demographic Analysis in Chapter 4 of EIAR.

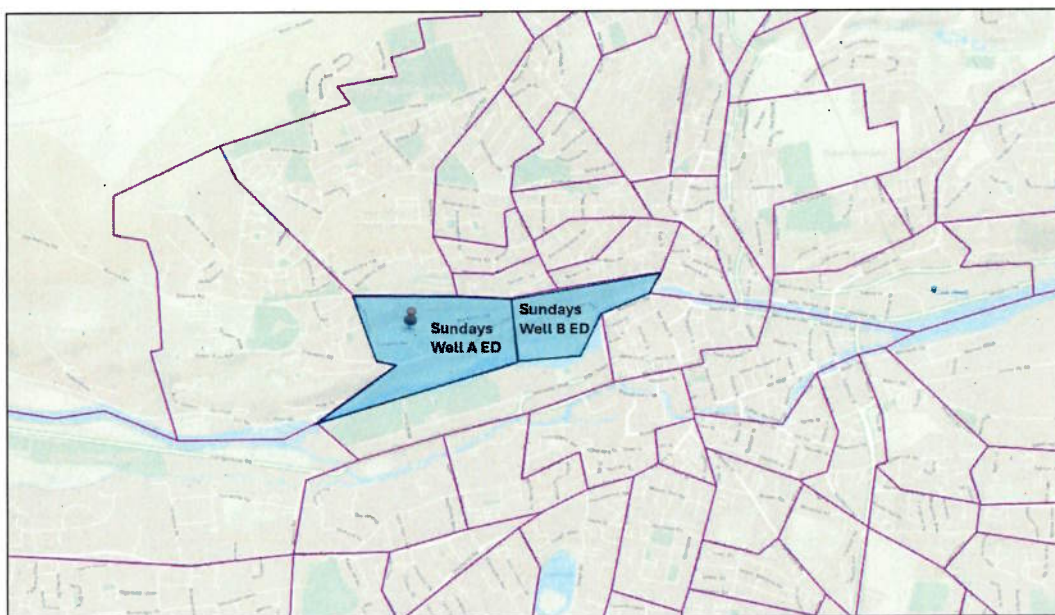


Figure 5 Location of Site in relation to Sundays Well EDs

Chapter 4 of the EIAR provides a comprehensive assessment of the wide range of services and facilities, including education, health, community, cultural, play, recreation and sports facilities and confirms that there are sufficient facilities available in the area and that these facilities can adequately provide for the new population anticipated as part of this development. Other key services such as healthcare, recreation and retail facilities have also been identified. The sites close proximity to Cork City centre and the presence of public transport links significantly reduces the reliance on proximity alone as a measure of accessibility to these facilities.

Jurek Kirakowski claims that *"no realistic assessment or definite proposals"* have be submitted in relation to the surrounding road segments. We highly disagree with this statement. MHL Consulting Engineers provided a robust Traffic and Transport Assessment, Mobility Management Plan, Quality Audit Report,



Stage 1 Road Safety Audit which includes specific information relating to the proposed development as well as the surrounding area. Furthermore, Chapter 12 of the EIAR provides an overview of the existing environment, including the current road network, traffic conditions, and surrounding transport infrastructure and includes a comprehensive and robust assessment of the potential effects on the local road network has been undertaken, covering both the short-term construction phase and the long-term operational phase of the development with mitigation measures aimed at minimising or avoiding significant impacts on traffic flow and road safety.

All documents contained in the planning pack that were submitted to Cork City Council were prepared to a very high standard by an experienced design team and contained all the relevant information required in relation to the proposed development.

Tara Vernon and others stated that *"a full archaeological and forensic investigation must be conducted to assess the possibility of human remains."* As outlined in Chapter 16 a field survey, geophysical survey and targeted archaeological testing of the proposed development lands were carried out.

A geophysical survey, utilising Ground Penetrating Radar (GPR) was undertaken in 2017, following the completion of the GPR survey and consultation with Cork City Council, a programme of archaeological test trenching was conducted which targeted all anomalies of potential interest identified in the geophysical survey as well as a representative sample of returns identified in the survey as being of less interest. The testing programme also consisted of linear test trenching of other areas of proposed development within the subject site that were not suitable for geophysical survey but are accessible and suitable for the mechanical excavation of archaeological test trenches. The proposed programme of archaeological testing was primarily focused on identifying any possible undocumented burial places or graves within the proposed development areas of the development site. The testing revealed no artefacts, features, deposits or remains of archaeological or cultural significance.

Tara Vernon and others raises concerns that the proposed development will put pressure on local utility services and is particularly concerned with the risk of *"overloading the sewage and water systems"* stating that *"no clear evidence has been presented that the existing infrastructure can support the scale of demand that would be generated."* We disagree with these claims. In relation to foul drainage and water supply for the proposed development, a pre connection enquiry was submitted to Irish Water and a confirmation of feasibility was issued.

All documents submitted to the Council were prepared by competent professionals to a high standard. Cork City Council assessed the submitted documents and were satisfied that the material submitted at the planning application stage provided them with all the relevant information required to approve the development. Moreover, the planning application was developed in a collaborative approach with Cork City Council where discussions took place prior to the application being lodged to ensure a high standard of development for the area.



## Summary and Conclusion

To conclude, Cork City Councils' decision to grant permission for the proposed development was made on the basis that it was fully consistent with policy, suitable in terms design and layout, and consistent with the proper planning and sustainable development of the area. The fact that permission was granted for the proposed development by Cork City Council without the need for a further information request, is a testament to the quality of the proposal.

In relation to the grounds of the third party appeals against Cork City Councils decision to grant permission under Ref. 2543847 our response to the issues raised is summarised as follows:

- 1. The proposed development is fully in accordance with Government Policy and the Cork City Development Plan 2022 and does not materially contravene the plan.**
- 2. The proposed development will not seriously injure the residential amenities of properties in the vicinity, the history associated with the Good Shepherd Convent or the Landscape Preservation Area and will enhance the Sundays Well area.**
- 3. The proposed development will not give rise to any adverse traffic or road safety issues.**
- 4. The planning application was accompanied by a very comprehensive list of supporting material which was prepared to a high standard and contains all the information required/sought by the planning authority.**

We trust that this submission will be taken into account in the Coimisiún assessment of the proposed development. Please contact the undersigned if you require any further information.

Yours Sincerely,



Cailin McNamee

McCutcheon Halley



**Appendix A - Non-Volant Mammal Survey completed by Veon in June 2025**





Forestry, Ecology & Environment

# Non-volant Mammal Survey

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Proposed Student Accommodation Development at  
the Former Good Shepherd Covent, Convent Avenue  
and Buckston Hill, Sunday's Well, Co. Cork

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Compiled by: Veon Ecology,  
David M. McGillicuddy B.Sc. (Hons) in Wildlife Biology.

Prepared for: Lafferty.

On behalf of: Bellmount Good Shepherd Ltd.



Completion Date: 10<sup>th</sup> June 2025





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## Executive Summary

This report presents the findings of a dedicated non-volant mammal survey undertaken to inform the proposed student accommodation development and associated infrastructure works located at the former Good Shepherd Convent, Sunday's Well, Co. Cork (hereafter referred to as the proposed development). The site is centred at Irish Transverse Mercator (ITM) coordinates Easting 565855 and Northing 572101 approximately.

The proposed development at the former Good Shepherd Convent site in Sunday's Well, Cork City, will include the conservation, conversion, and extension of the former Good Shepherd Convent, Home Building, Orphanage Building, Well Site, Gate Lodge, and Bakehouse to provide student accommodation and ancillary services. A full description is provided in the accompanying Environmental Impact Assessment Report (EIAR) (Chapter 2) and statutory notices.

This report provides a concise overview of the key findings and implications of the mammal surveys conducted for the proposed development. The survey aimed to assess the presence of non-volant mammal species within the project site and its immediate surroundings. The methodology involved a combination of field surveys, camera trapping, and visual observations.

The survey identified a limited range of mammal species within the study area. Fox, wood mouse, and pygmy shrew, as well as signs of domestic cat and dog activity, were recorded, indicating that the site has limited potential to support protected non-volant mammal species. These survey results have informed the development of targeted mitigation measures for non-volant mammals.

The contents of this Non-volant Mammal Survey report, prepared by Veon Ecology, are true and have been prepared with due regard to the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct<sup>1</sup>.

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<sup>1</sup> CIEEM's Code of Professional Conduct. Available at: <https://cieem.net>.



## General

### Details of Author(s)

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With over 8 years of experience as an ecologist and former wildlife education officer, David has led and contributed to a wide range of projects, producing comprehensive reports and assessments for Biodiversity Management Plans (BMP), Natura Impact Statements (NIS), Ecological Impact Assessments (EclA), Environmental Impact Assessments (EIA), and habitat mapping, etc.

David has expertise in a wide range of survey methods, techniques, and equipment, with a proven track record in surveying and safeguarding protected species such as non-volant mammals, birds, and bats. Additionally, David has experience in assessing invasive alien species (IAS), river management, conducting botanical surveys, and evaluating water quality through physiochemical and biological assessments. He has applied his skills to diverse projects, contributing to the design and implementation of appropriate, site-specific mitigation measures for the protection of ecological receptors.

**Scope of Contribution in Preparing This Report:** Desktop Survey, Habitat Survey, Mammal Survey, Impact Assessment, Finalising Report.

### Quality Assurance

Veon Ltd. Veon Ecology						
Revision	Description	Author:	Date	Reviewed By:	Date	Doc Ref No.
1.0	Draft Report	DM	10/06/2025	DP/PM	10/06/2025	15733

### Confidentiality Notice

This report may contain sensitive information relating to protected species. The information contained herein should not be disseminated without the prior consent of Veon Ltd. (Veon Ecology). All records of breeding sites and resting places of protected species must remain confidential. Where this report is circulated publicly or uploaded to online planning portals, references to breeding sites and resting places of protected species must be redacted, and any maps pertaining to their locations must be removed from the document.



## Section 1: INTRODUCTION

### 1.1 Background

Veon Ltd. (Veon Ecology) has been appointed by Lafferty, on behalf of the applicant, to undertake a survey for non-volant mammals in the context of the proposed student accommodation development and associated infrastructure works located at the former Good Shepherd Convent, Sunday's Well, Co. Cork, hereafter referred to as "the proposed development".

This report describes the dedicated non-volant mammal surveys undertaken for the proposed development. Previous baseline surveys within and adjoining the proposed development site were completed in 2024 by Veon Ecology. The site was revisited on a number of dates in March and May 2025 to undertake a dedicated mammal survey, with a particular focus on Badger (*Meles meles*) and Otter (*Lutra lutra*). The location and layout of the proposed development site is presented in **Figure 1.1**.

The targeted mammal surveys completed at the study area were spread across 4 no. survey visits, covering the footprint of the proposed development. The surveys included initial ecology walkovers of the study area, which identified suitable habitats and potential breeding locations, the deployment of trail cameras at strategic locations within the site, and targeted surveys within the site.

This report should also be read in conjunction with the Environmental Impact Assessment Report (EIAR) prepared for the proposed development.

### 1.2 Objectives of Survey

The objectives of the survey are as follows:

- To identify the presence or absence of non-volant mammal species.
- To identify and record signs of mammal activity or refuges.
- To describe potential impacts on relevant non-volant mammal species resulting from the proposed development.
- To provide appropriate mapping and photographic records of the findings.
- To provide appropriate mitigation measures.

### 1.3 Statement of Authority

This non-volant mammal survey report was written by David McGillicuddy, B.Sc. (Hons), ACIEEM, AEnvCW. David is a project ecologist with Veon Ltd. (Veon Ecology) and has over 8 years of experience in ecological research, teaching, and assessment. He is experienced in several key environmental projects and in the production of ecological reports, including Biodiversity Management Plans, Natura Impact Statements, and Ecological Impact Assessments. Field surveys were undertaken by David, who has experience in habitat, botanical, bird and mammal surveying, habitat management, and the design of suitable site-specific mitigation measures.

David has expertise in using a range of survey methods, techniques, and equipment, with a proven track record in surveying and safeguarding protected species, including non-volant mammals, birds, and bats. Additionally, he has experience in assessing invasive species, river management, conducting botanical surveys, and evaluating water quality through physiochemical and biological assessments. David has applied his expertise to a variety of projects, contributing to the development and specification of targeted mitigation measures designed to address the specific ecological requirements of each site.



## 1.4 Proposed Development

The proposed development will include the conservation, conversion, and extension of the former Good Shepherd Convent, Home Building, Orphanage Building, Well Site, Gate Lodge, and Bakehouse to provide student accommodation and ancillary services. A full description is provided in the accompanying EIAR (Chapter 2) and statutory notices.

The proposed development comprises the construction of new residential buildings and the integration of 3 no. existing structures into the overall project. Two of these existing buildings have been extensively damaged by fire and are currently in a dangerous structural condition.



Access to the proposed development site is via the existing Gate House entrance from Convent Avenue (L99112), which connects Strawberry Hill (L5102) with Sunday's Well Road (R846). The site's western boundary adjoins Cork City Gaol (Museum). The majority of the site boundary consists of a large, well-constructed stone wall. The surrounding area to the north, east, and south of the proposed development site is primarily composed of residential dwellings. The site will be landscaped to retain the existing trees along the internal avenue, with green amenity areas created.

Currently, the site comprises overgrown amenity grassland, scattered mature trees, and the remaining structures of the former Good Shepherd Convent. Due to years of neglect and recent fires, most of the buildings on-site are now derelict. The wider area includes a mix of built-up, brownfield, and greenfield land. Surrounding habitats and land uses are described by Corine 2018<sup>2</sup> as: Discontinuous urban fabric (code 112), Green urban areas (code 141), and Continuous urban fabric (code 111). The proposed development site footprint is situated on land mapped as discontinuous urban fabric according to the Corine Land Cover 2018 classification.

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<sup>2</sup> <https://gis.epa.ie/EPAMaps/>. Accessed 04/06/2025.



<p><b>Site Location:</b> Lafferty</p> <p><b>Map:</b> Location Map</p>	<p><b>Legend</b></p> <p> Redline_Boundary</p>	<p>EPSG: 2157 Scale: 1:5,000 Date: 10/06/2025</p>	
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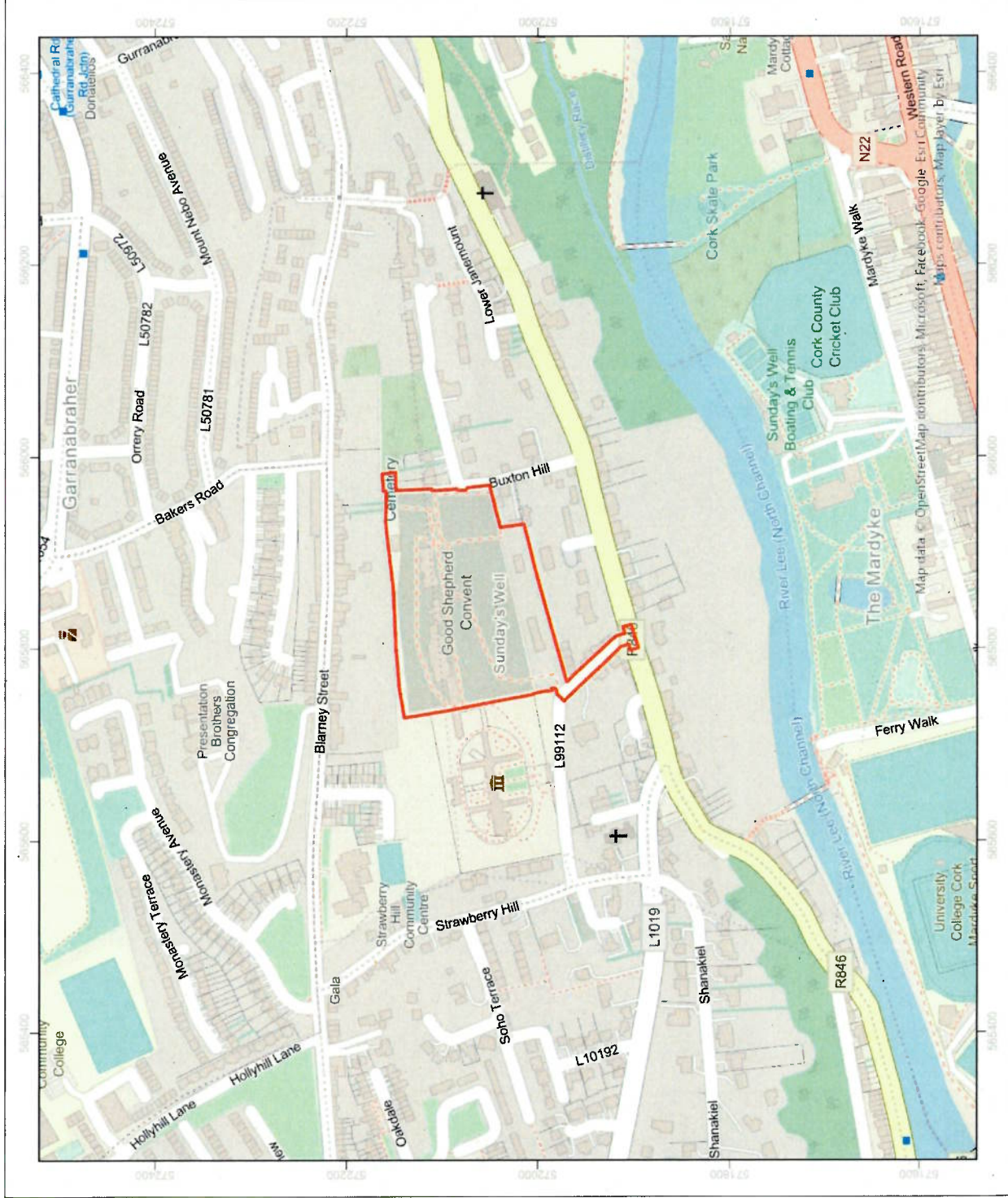


Figure 1.1: Location and layout of the proposed development site.



## Section 2: METHODOLOGY

### 2.1 Desk Study

The desk study involved a comprehensive review of information and data available for the existing environment. The principal sources of information referred to during the desk review included:

- National Parks and Wildlife Service (NPWS) online datasets and literature.
- Review of available online information from the National Biodiversity Data Centre (NBDC).
- Geographic Information System (GIS) online mapping and Environmental Protection Agency (EPA) mapping database.

An ecological data search for the survey site and the surrounding area was conducted using NBDC and biodiversity Ireland. In addition, aerial mapping and ordnance survey maps were reviewed to identify any features of interest within and surrounding the survey site (e.g. large ponds and watercourses). A number of protected mammal species have been recorded in the 10 km grid square overlapping the site. The following table (Table 2.1) lists the mammal species recorded in the NBDC documented records.

Table 2.1. Mammal species recorded in the 10 km<sup>2</sup> grid surrounding the site (NBDC, 2025).

Mammal species recorded in 10 km <sup>2</sup>	
Common Name/Scientific Name	Designation
American Mink ( <i>Neovison vison</i> )	Invasive Species: High Impact Invasive Species    Regulation S.I. 477 (Ireland)
Bank Vole ( <i>Myodes glareolus</i> )	Invasive Species: Medium Impact Invasive Species
Brown Long-eared Bat ( <i>Plecotus auritus</i> )	Protected Species: EU Habitats Directive    Annex IV    Protected Species: Wildlife Acts
Brown Rat ( <i>Rattus norvegicus</i> )	Invasive Species: High Impact Invasive Species    Regulation S.I. 477 (Ireland)
Common Pipistrelle ( <i>Pipistrellus pipistrellus</i> )	Protected Species: EU Habitats Directive    Annex IV    Protected Species: Wildlife Acts
Coypu ( <i>Myocastor coypus</i> )	Invasive Species: High Impact Invasive Species    EU Regulation No. 1143/2014    Regulation S.I. 477 (Ireland)
Daubenton's Bat ( <i>Myotis daubentonii</i> )	Protected Species: EU Habitats Directive    Annex IV    Protected Species: Wildlife Acts
Eurasian Badger ( <i>Meles meles</i> )	Protected Species: Wildlife Acts
Eurasian Pygmy Shrew ( <i>Sorex minutus</i> )	Protected Species: Wildlife Acts
Eurasian Red Squirrel ( <i>Sciurus vulgaris</i> )	Protected Species: Wildlife Acts
European Otter ( <i>Lutra lutra</i> )	Protected Species: EU Habitats Directive    Annex II    Annex IV    Protected Species: Wildlife Acts
European Rabbit ( <i>Oryctolagus cuniculus</i> )	Invasive Species: Medium Impact Invasive Species
Feral Ferret ( <i>Mustela furo</i> )	Invasive Species: High Impact Invasive Species
Feral Goat ( <i>Capra hircus</i> )	Invasive Species: Medium Impact Invasive Species
Greater White-toothed Shrew ( <i>Crocidura russula</i> )	Invasive Species: Medium Impact Invasive Species
House Mouse ( <i>Mus musculus</i> )	Invasive Species: High Impact Invasive Species
Irish Hare ( <i>Lepus timidus</i> subsp. <i>hibernicus</i> )	Protected Species: Wildlife Acts
Irish Stoat ( <i>Mustela erminea hibernica</i> )	Protected Species: Wildlife Acts
Lesser Noctule ( <i>Nyctalus leisleri</i> )	Protected Species: EU Habitats Directive    Annex IV    Protected Species: Wildlife Acts
Natterer's Bat ( <i>Myotis nattereri</i> )	Protected Species: EU Habitats Directive    Annex IV    Protected Species: Wildlife Acts
Red Fox ( <i>Vulpes vulpes</i> )	Not protected
Sika Deer ( <i>Cervus nippon</i> )	Invasive Species: Invasive Species    High Impact Invasive Species    Regulation S.I. 477 (Ireland)    Protected Species: Wildlife Acts
Soprano Pipistrelle ( <i>Pipistrellus pygmaeus</i> )	Protected Species: EU Habitats Directive    Annex IV    Protected Species: Wildlife Acts
West European Hedgehog ( <i>Erinaceus europaeus</i> )	Protected Species: Wildlife Acts
Whiskered Bat ( <i>Myotis mystacinus</i> )	Protected Species: EU Habitats Directive    Annex IV    Protected Species: Wildlife Acts
Wood Mouse ( <i>Apodemus sylvaticus</i> )	Not protected



## 2.2 Field Surveys

During the ecological surveys, the habitat suitability for protected non-volant mammal species was assessed. Information obtained during the desk study and ecology walkover surveys identified target species and informed the scope and methodology of the mammal surveys undertaken.

Trail cameras were deployed at a number of suitable locations identified during the ecology walkovers and previous site surveys. To supplement site walkovers and trail cameras, targeted transect surveys were undertaken within the areas identified as the most suitable or which showed the most mammal activity.

The non-volant mammal surveys, which included detailed walkovers of the study area, followed methodologies outlined in the following guidance documents:

- Joint Nature Conservation Committee (JNCC) (2004). *Common Standards Monitoring Guidance for Mammals*, Version August 2004.
- Marnell, F., Looney, D. & Lawton, C. (2019) Ireland Red List No. 12: Terrestrial Mammals. National Parks and Wildlife Service, Department of the Culture, Heritage and the Gaeltacht, Dublin, Ireland.
- National Roads Authority (NRA) (2009). *Ecological Surveying Techniques for Protected Flora and Fauna during the Planning of National Road Schemes*.
- NRA (2008a). *Guidelines for the Treatment of Badger Prior to the Construction of National Road Schemes*. National Roads Authority, Dublin, Ireland.
- NRA (2008b). *Guidelines for the Treatment of Otters Prior to the Construction of National Road Schemes*. National Roads Authority, Dublin, Ireland.

Dedicated non-volant mammal surveys for the proposed development site were undertaken by Veon Ecology, Project Ecologist David McGillycuddy B.Sc. (Hons). Fauna such as Otters, Badgers, and other protected non-volant mammal species were surveyed through the detection of field signs such as tracks, trails, markings, feeding signs, burrows, setts, holts, dens and other resting/breeding places, droppings, and scats, as well as by direct observation. Additional mammal field signs were also noted during other site visits. Habitat suitability was also recorded.

Target species for the purpose of the assessment include:

### Primary:

- Badger and Otter

Badger (*Meles meles*) is protected under the Wildlife Act, 1976 and the Wildlife (Amendment) Act, 2000.

Otter (*Lutra lutra*) is protected under the Habitats Directive (92/43/EEC), Annex II and Annex IV; the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention), Appendix II; the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), Appendix I; the Wildlife Act (1976); and the Wildlife (Amendment) Act (2000). Otter is classified as Least Concern in the Irish status (Marnell *et al.*, 2019) and is classified as Near Threatened (NT) by the IUCN (2021)<sup>3</sup>. The NPWS published a detailed Otter Threat Response Plan in 2009.

### Secondary:

- All other protected non-volant mammal species with potential to occur within or in proximity to the study area.

<sup>3</sup> The IUCN Red List of Threatened Species most recent assessment of Eurasian Otter (*Lutra lutra*). Available at: <https://www.iucnredlist.org>.



### 2.2.1 Survey Area

To ensure that the entire potential Zone of Influence (Zoi) on the local non-volant mammal population was covered, Veon Ecology carried out dedicated non-volant mammal surveys within a c. 150 m buffer of the proposed development site boundary, as well as both upstream and downstream of any relevant watercourses (where access permitted and as appropriate). Considering the nature and location of the proposed development, this survey area was deemed sufficient to cover the potential Zoi for local non-volant mammal species. Ad hoc mammal data were also recorded within this area during previous surveys.

Access to parts of the surrounding area was restricted due to third-party landownership; however, the majority of the surrounding area comprises built land with regular disturbance, which is considered largely unsuitable for supporting regularly occurring populations of protected non-volant mammal species.

There are no mapped EPA watercourses or drainage ditches within or immediately adjacent to the proposed development site. Additionally, no other receptors, such as turloughs or ephemeral ponds, were identified or are mapped within the site or its immediate vicinity. The nearest watercourse, according to EPA mapping, is the North Channel of the River Lee, which is located c. 145 m south of the proposed development site boundary at its nearest point.

### 2.3 Trail cameras

To supplement the walkover surveys, trail cameras were deployed at locations identified as suitable habitat and/or showing evidence of mammal activity, including existing mammal trails. The following table describes the locations of the deployed wildlife cameras (Num'axes, model: PIE1059). The camera locations are detailed in **Table 2.2** below.

Table 2.2: Trail camera locations.

Site/Cam No.	GPS Coordinates	Comments
1	Lat/Long: 51.899335, -8.4965779	Trail camera deployed along existing trails within the grassland/scrub habitat in the southern section of the proposed development site.
2	Lat/Long: 51.899528, -8.4976116	Trail camera deployed in Mixed broadleaved/conifer woodland in the western section of the proposed development site.
3	Lat/Long: 51.900303, -8.4966314	Trail camera deployed along existing trails within the scrub habitat in the northern section of the proposed development site.
4	Lat/Long: 51.899430, -8.4953341	Trail camera deployed within the scrub habitat in the south-eastern section of the proposed development site.

Trail cameras were deployed at 4 no. locations throughout the proposed development site (see **Figure 2.1**). The cameras are infra-red equipped to allow monitoring of activity by night as well as by day. The cameras were triggered by movement, at which point a photo and video were recorded, with a 10 second recording delay applied. The aim of the camera trap survey was to record evidence of terrestrial non-volant mammal activity to inform the ecological assessment.

Trail cameras No. 1 and No. 2 were installed on 14<sup>th</sup> March 2025 and retrieved on 20<sup>th</sup> March 2025. Trail cameras No. 3 and No. 4 were installed on 2<sup>nd</sup> May 2025 and retrieved on 6<sup>th</sup> May 2025. They were positioned to capture views of existing mammal trails, and all photographs and videos recorded were reviewed for the presence of protected species.





Figure 2.1: Locations of trail cameras deployed on site.



## 2.4 Target Species Surveys

### 2.4.1 Badger (*Meles meles*)

Badgers occur in a wide variety of habitat types in both lowland and upland regions. Setts are typically located within woodland and woodland edge, hedgerow, and scrub habitats, particularly where these occur adjacent to suitable foraging areas such as grazed grasslands. Surveys to identify badger setts and other field signs can be undertaken at any time of the year but are most effective between November and April, when vegetation cover is reduced.

Targeted badger surveys were undertaken in March and May 2025. These surveys focused on areas with potential badger suitability within the proposed development site. During the surveys, the habitats and linear features on-site were walked following clearly defined mammal trails, checking for evidence of badger activity. Any ad hoc data recorded within the study area during previous multidisciplinary ecological field surveys was also included.

### 2.4.2 Otter (*Lutra lutra*)

Otters are found in both freshwater and saltwater habitats. They are commonly present along rivers and around lakes. They can also be found along undisturbed rocky shores and inshore islands. Otters are known to use drains and ditches, as well as other (non-aquatic) linear features, to move between catchments and may be found away from watercourses. The presence of Otters can be confirmed through simple field sign surveys, including searches for spraints (otter droppings), footprints, slides, or feeding remains.

Otter surveys can be undertaken at any time of year but are less likely to provide reliable results during mid to late summer, when dense vegetation can make it difficult to find field signs and holts. Surveys may also be unreliable if conducted during or immediately after periods of high flow or heavy rain, as many field signs may be washed away. It is noted that otters are largely nocturnal, particularly in areas subject to high levels of disturbance, as evidenced by their presence in the centre of Cork City.

The proposed development site was assessed for signs of Otter. Survey methodology followed guidance outlined in NRA (2008b) and included searches for breeding or resting sites within c. 150 m of the proposed development site boundary where access allowed. Evidence of Otters, including spraints, footprints, or feeding remains, was recorded where present.

### 2.4.3 Other Non-volant Mammals

Seventeen other species of terrestrial non-volant mammals have been recorded within hectad W67. Six of these are protected under the Irish Wildlife Act: namely, Red Squirrel, Pygmy Shrew, Irish Hare, Irish Stoat, Sika Deer, and Hedgehog.

## 2.5 Survey Constraints and Limitations

There were no significant constraints to the survey, as the walkover was coordinated and focused primarily on the footprint of the proposed development site and areas of potentially suitable habitat for protected non-volant mammal species. The surveys were conducted during the optimal survey period and under clear, dry weather conditions. However, access to some third-party lands adjacent to the site was not possible, which limited the survey area. It is noted, however, that the majority of the surrounding area comprises built land with regular disturbance, which is considered largely unsuitable for supporting regularly occurring populations of protected non-volant mammal species.



## Section 3: RESULTS

### 3.1 Walkover Surveys

#### Irish Hare

Irish Hare has been recorded within the NBDC 10 km grid square overlapping the proposed development site (NBDC, 2025). However, the species was not recorded on site during walkover surveys. Overall, the habitats within the proposed development site are not considered optimal for Irish Hare. This species is adaptable and occupies a wide variety of habitats but typically reaches its highest densities on farmland, particularly where there is a mix of grassland and arable fields, along with hedgerows and other suitable cover. The habitats within the proposed development area are therefore considered to be of negligible value for Irish Hare.

#### Irish Stoat

Irish Stoat has been recorded within the NBDC 10 km grid square overlapping the proposed development site (NBDC, 2025). During walkover surveys, no breeding sites or other evidence of this species were observed. The surveys included searching for signs such as droppings, suitable dens, and/or burrows. Irish Stoats occur in most habitats with sufficient cover, including urban areas, though they are most often found in wooded areas. Given their broad habitat use, Irish Stoats could potentially occur at the proposed development site. Considering the types of habitat recorded within the proposed development site, Irish Stoat could potentially occur, and their presence cannot be ruled out.

#### Red Fox

Red Fox has been recorded within the NBDC 10 km grid square overlapping the proposed development site (NBDC, 2025). Red Fox was observed during walkover surveys and was frequently encountered during the camera trapping survey. Fox scat was also recorded on a number of occasions.

#### Deer

There are three species of deer with well-established populations in Ireland: Fallow deer (*Dama dama*), Red deer (*Cervus elaphus*), and Sika deer (*Cervus nippon*). Both Red deer and Fallow deer have not been recorded within the NBDC 10 km grid square overlapping the proposed development site; however, Sika deer have been recorded (NBDC, 2025). No evidence of these species using the proposed development site was recorded through visual observations, tracks, or droppings. Sika deer are a non-native species that prefer forests with dense understorey, thickets, natural woodlands, and commercial plantations, but will also forage in open grassy areas with dense cover nearby. Sika deer are highly opportunistic feeders, foraging on grasses as well as a range of shrubs and tree species. The habitats recorded within the proposed development area are considered of negligible value for this species.

#### Pygmy Shrew

Pygmy Shrew has been recorded within the NBDC 10 km grid square overlapping the proposed development site (NBDC, 2025). Pygmy Shrews are common and widespread across Ireland, wherever there is sufficient ground cover, and they show a preference for habitats such as hedgerows and grasslands. However, they are rarely seen, mainly due to their small size and secretive nature. During the field surveys, direct evidence of Pygmy Shrew was found on-site in the form of a single dead individual in the grassland habitat. The walkover surveys confirmed that the habitats within the study area are suitable for Pygmy Shrew and that they are present on-site.

#### Hedgehog

Generally, Hedgehogs prefer edge habitats and pasture but have, in recent years, begun to colonise urban areas. Hedgehog has been recorded within the NBDC 10 km grid square overlapping the proposed development site (NBDC, 2025). While not observed during the field surveys, the walkovers identified that the habitats within the study area are suitable for Hedgehog. Considering the types of habitat recorded within the proposed development area, Hedgehog could potentially occur, and their presence cannot be ruled out.



### Pine Marten

Pine Martens have not been recorded within the NBDC 10 km grid square overlapping the proposed development site (NBDC, 2025). The majority of the site is of low suitability for Pine Marten due to a lack of woodland and forestry cover. Pine Martens are generally absent from urban areas within their European range, particularly in Ireland. They are woodland specialists and typically avoid areas of human settlement and disturbance. No signs of Pine Marten were recorded during the site surveys, and the habitats comprising most of the proposed development area are considered to be of negligible to low value for this species.

### Wood Mouse

Wood Mouse is likely to inhabit the site where suitable habitats and conditions exist. In general, good cover and the availability of food are prerequisites. The scrub, hedgerows, and grassland habitats are suitable for this species. Wood Mouse has been recorded within the NBDC 10 km grid square overlapping the proposed development site (NBDC, 2025). During the field surveys, direct evidence of Wood Mouse was found on-site in the form of a single dead individual in the grassland habitat. The walkover surveys confirmed that the habitats within the study area are suitable for Wood Mouse and that they are present on-site.

### Red Squirrel

Red Squirrel is known to occur in the wider area and has been recorded within the NBDC 10km grid square overlapping the proposed development site (NBDC, 2025). During walkover surveys, no breeding sites or other evidence of this species were observed. The surveys included searching for signs such as dreys, feeding remains, and suitable nests or resting sites. Red Squirrel can be found throughout Ireland. It feeds mainly on tree seeds, although it can also utilise fungi, fruit, and buds as they become available in the woodland. Red Squirrels occur in all types of habitats but are typically found at higher densities in mature mixed broadleaved forests. They can also survive in monoculture coniferous woodland. However, no signs of Red Squirrel were recorded during the site surveys, and the habitats which make up the majority of the proposed development area are considered to be of negligible to low value for this species.

### Domestic Cats and Dogs

Evidence of domestic dog presence was recorded on-site, including prints and droppings, indicating frequent activity within the study area. Direct observations of domestic cats were also noted both on-site and in the surrounding vicinity. Domestic cats are known to pose a predation risk to small mammals, including species such as Pygmy Shrew, as well as to breeding birds and other wildlife. Similarly, domestic dogs may disturb wildlife through direct predation or by causing stress and displacement. The presence of these domestic animals likely influences local small mammal populations.



### 3.2 Trail Camera Survey

The wildlife trail camera survey recorded a limited number of species, including Red Fox, and avifauna such as Song Thrush (*Turdus philomelos*), Blackbird (*Turdus merula*), and Blue Tit (*Cyanistes caeruleus*).

Red Fox was the most common species detected, followed by Blackbird, Song Thrush, and Blue Tit. No evidence of Badger or Otter was recorded (see **Table 3.1**).

During the trail camera surveys conducted in March and May 2025, no records of Badger or Otter were captured. Based on professional assessment, it is considered unlikely that these protected species use the site. As a precautionary measure, it is recommended that a pre-construction survey be undertaken no later than six months prior to construction and ideally immediately before the commencement of works within the study area to reconfirm the existing environment and survey results. Any mitigation and monitoring identified as required following the pre-construction mammal survey (if carried out) will be implemented.

Table 3.1: Trail camera survey results.

Site/Camera	Date Recorded	Species Recorded
Cam No. 1	17/03/2025, 18/03/2025	Red Fox ( <i>Vulpes vulpes</i> )
Cam No. 2	15/03/2025	Red Fox ( <i>Vulpes vulpes</i> )
Cam No. 2	16/03/2025	Song Thrush ( <i>Turdus philomelos</i> )
Cam No. 2	16/03/2025	Blackbird ( <i>Turdus merula</i> )
Cam No. 3	04/05/2025	Red Fox ( <i>Vulpes vulpes</i> )
Cam No. 4	03/05/2025, 04/05/2025	Blackbird ( <i>Turdus merula</i> )
Cam No. 4	03/05/2025, 04/05/2025, 05/05/2025, 06/05/2025	Red Fox ( <i>Vulpes vulpes</i> )
Cam No. 4	05/05/2025	Blue Tit ( <i>Cyanistes caeruleus</i> )

Red Fox was the most frequently recorded species, detected on all four cameras between March and May 2025, indicating its widespread presence across the survey area. Blackbird was recorded at two cameras, with observations in both March and May. Song Thrush was recorded once on Camera No. 2 in March, while Blue Tit was recorded once on Camera No. 4 in May. Together with the walkover survey results, these findings demonstrate a limited diversity of protected mammalian species utilising the habitats within the proposed development site during the survey period.



## 3.3 Target Species Surveys

### 3.3.1 Badger Survey Results

Badgers construct and use setts of different types (Main, Annexe, Subsidiary and Outlier setts) (SNH, 2003). Main setts are of the greatest conservation importance and are where breeding typically occurs. No evidence of Badger activity was found within the site, and no Badger sett was recorded during field surveys. In addition, Badgers were not recorded on the camera traps during the surveys.

The proposed development site was walked, searching for signs of Badger. Continuous, well-defined mammal trails around the margin of the habitats and along linear features on-site were followed and often diverted into the scrub habitat. These trails are likely to have been created by Fox. No Badger sett or signs of Badger activity were found within the survey area. The wildlife cameras did not detect Badger during the surveys, with no registrations over the combined 12 days and 10 nights from 14<sup>th</sup> March 2025 to 20<sup>th</sup> March 2025, and from 2<sup>nd</sup> May 2025 to 6<sup>th</sup> May 2025.

In summary, no active setts, latrines, or other signs of Badger activity were recorded within the proposed development site. As such, the potential impact on Badgers is considered to be temporary, imperceptible, and minor negative at the local scale. As a highly precautionary measure, Badgers will be protected through measures including pre-construction surveys and the implementation of buffer zones as required. No actions to exclude Badgers from active setts will be undertaken. By implementing the mitigation measures outlined in **Section 4** below and the accompanying EIAR (Chapter 14), residual impacts on Badgers are not anticipated.

### 3.3.2 Otter Survey Results

No evidence of breeding or resting sites for Otters was recorded within the study area. Additionally, no signs of Otter presence, such as spraints, footprints, or feeding remains, were found. Otters are known to occur along the River Lee to the south, which is located approximately 145 m from the proposed development site boundary at its nearest point. The terrestrial habitats within the proposed development site itself are of negligible value for Otters.

Given the nature of the proposed development, construction activities are not expected to generate significant daytime noise or vibration at locations with suitable habitat for Otters beyond the proposed development site boundary. Construction lighting within the footprint of the proposed development has the potential to cause increased light pollution in adjacent areas and could potentially impact Otters. However, this is considered highly unlikely due to the presence of existing light pollution in the surrounding area and the lack of suitable foraging habitat within or immediately adjoining the site. Furthermore, works will largely be confined to daylight hours.

The site walkover surveys did not identify Otter activity within the proposed development site. No evidence of breeding, feeding, or resting sites for Otters was recorded within the study area. Historic records for Otters are all located outside the footprint of the project area. The potential impact on Otters is predicted to be negative, not significant, and short-term at a local level.

As a precautionary measure, Otters will be protected through measures including pre-construction surveys and the implementation of appropriate buffer zones as required. Therefore, no direct impact on Otters during the construction and operation of the proposed development is likely. Increased activity and human presence, noise, and additional lighting may disturb or displace Otters during the operational phase of the proposed development. However, it is noted that the surrounding landscape is already subject to high levels of disturbance from traffic and human activity, and Otters currently utilising the wider area are expected to be habituated to these ongoing disturbance factors. Given the relatively negligible value of the existing habitats at the site for Otters, the levels of disturbance within adjacent habitats, and the proposed landscaping plan, impacts on Otters during the operational phase are predicted to be neutral, imperceptible, and long-term at a local level. By implementing the mitigation measures outlined in **Section 4** below and in the accompanying EIAR (Chapter 14), residual impacts on Otters are not anticipated.



## Section 4: MITIGATION MEASURES

Collated mitigation measures that will be implemented during the construction and operation of the proposed development to avoid or reduce potential impacts on the receiving environment are outlined in the accompanying EIAR (Chapter 14), and should be read in conjunction with this report.

The following measures shall be implemented to prevent impacts on protected non-volant mammals:

- Stringent and robust mitigation measures are proposed for the avoidance of impacts affecting water quality.
- A site speed limit of 20 km/h will be strictly enforced to prevent vehicular traffic fatalities.
- Monitoring will continue throughout the construction phase.
- It is recommended that a pre-construction survey be undertaken no later than 6 months prior to construction and ideally immediately prior to the commencement of works within the study area to reconfirm the existing environment and survey results.
- Implement any mitigation and monitoring identified as being required following pre-construction mammal survey (if carried out).
- In general, works close to badger setts may only be conducted under the supervision of a qualified expert and under guidance/licence from the NPWS.
- No heavy machinery will be used within 30 m of badger setts (unless carried out under guidance/licence from the NPWS); lighter machinery (generally wheeled vehicles) should not be used within 20 m of a sett entrance; light work, such as digging by hand or scrub clearance, should not take place within 10 m of sett entrances. During the breeding season (December to June inclusive), none of the above works should be undertaken within 50 m of active setts.
- Fencing will be maintained and regularly checked to ensure effectiveness throughout the construction phase.
- As best-practice, all construction-related rubbish on site (e.g., plastic sheeting, netting, etc.) should be kept in a designated area on-site and off the ground level to protect Hedgehogs and other small mammals (e.g., Pygmy Shrew) from entrapment and death.
- Works likely to cause disturbance during Hedgehog hibernation, for example removal of hibernation habitats such as log piles and dense scrub, should not take place from November to March.
- Vegetation will be removed in sections, working in a consistent direction to prevent entrapment of protected fauna that may be present.
- An ecologist will supervise areas where vegetation, scrub, and hedgerow removal will occur prior to and during construction as appropriate (e.g., an ecologist may be required during some clearance works in areas where vegetation is too dense to check beforehand).
- Construction operations will take place during daylight hours to minimise disturbances to faunal species at night. The use of noisy machinery should cease at least 2 hours before sunset.
- Lighting should be directed away from mature vegetation and any relevant watercourses.
- All liquid, solid, and powder containers will be clearly labelled and stored in sealable containers.
- Vehicular traffic during the construction phase along the site access roads may result in fatalities, however, this is not expected to be significant due to the mainly diurnal requirement for access and speed restrictions in place.
- During construction, open trenches/excavations must incorporate facilities for badgers (and other wildlife, such as otters, foxes, hedgehogs etc.) to escape, by means of gently sloping earth-inclines to be left at the end of each workday at each end of any open trenches/excavations.
- An emergency response procedure must be implemented if signs of Otter are discovered. All works must cease if Otters or their shelters are found, until appropriate measures are taken.
- In the event that an issue arises, the NPWS will be updated and consulted, relevant guidelines shall be followed, and any licences or amendments to licences will be sought from the NPWS.



## Section 5: CONCLUSION

The NBDC records were consulted as part of the desktop study. The following non-volant mammal species protected under the Irish Wildlife Acts have been recorded within the 10 km grid square (W67) overlapping the proposed development site: Badger, Otter, Red Squirrel, Pygmy Shrew, Irish Hare, Irish Stoat, Sika Deer, and Hedgehog.

There are a number of invasive non-volant mammal species recorded within the same 10 km grid square (W67) overlapping the site. These include: Mink, Bank Vole, Brown Rat, Coypu, Rabbit, Feral Ferret, Feral Goat, Greater White-toothed Shrew, House Mouse, and Sika Deer.

Records of some of these species in the wider area are relatively recent, with many occurring from 2015 onwards. While not observed during surveys, it is likely that Hedgehog and Irish Stoat may use the site due to the suitability of habitats present, and their presence cannot be ruled out.

Pine Marten and Irish Hare are listed on Annex V of the EU Habitats Directive. No breeding or resting sites such as dens, forms, or squirrel dreys were observed within the proposed development site footprint during field surveys, and the survey area is considered less favourable for these species.

No Badger sett or evidence of Badger activity was recorded within the site boundary during surveys. However, there remains a possibility that Badger activity could occur within the study area in the future, though this is considered unlikely. A pre-construction mammal survey should be undertaken to confirm existing conditions prior to construction. Should Badger activity or a new sett be encountered, NPWS will be informed, and the NRA Guidelines for the Treatment of Badgers Prior to the Construction of National Road Schemes will be followed.

No signs of Otter activity were recorded within the site boundary during surveys, although Otters are known to occur along the River Lee to the south, which is located approximately 145 m from the proposed development site boundary at its nearest point. The terrestrial habitats within the proposed development site itself are of negligible value for Otters. A pre-construction mammal survey should be undertaken within the study area to reconfirm the existing environment. If an Otter holt is encountered at any point, NPWS will be informed, and the NRA Guidelines for the Treatment of Otters Prior to the Construction of National Road Schemes will be followed.

Non-volant mammal surveys within the proposed development site recorded no signs of Badger, Otter, Pine Marten, Irish Hare, or Red Squirrel activity, with habitats largely unsuitable for these species. Hedgehog and Irish Stoat were not observed on-site but could potentially occur given the habitat types present. Red Fox was observed during walkover surveys and was frequently encountered during trail camera surveys. Fox scat was also recorded on several occasions. Deer species were not observed, with habitats considered unsuitable for them. Pygmy Shrew and Wood Mouse were confirmed present through direct evidence, with suitable on-site habitats for these species. Evidence of domestic cats and dogs was observed on-site and may impact local wildlife through predation and disturbance.

To summarise, the results of the terrestrial non-volant mammal survey indicate that the survey area supports limited foraging and commuting terrestrial mammals. While undertaking surveys in suitable habitats for protected non-volant mammal species, no breeding sites such as setts, holts, dens, or dreys were observed within the proposed development footprint. Mitigation measures will be implemented to minimise any potential impacts on the relevant protected species and their associated habitats.



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Section 7: APPENDICES  
 Appendix 1. MAPS & FIGURES

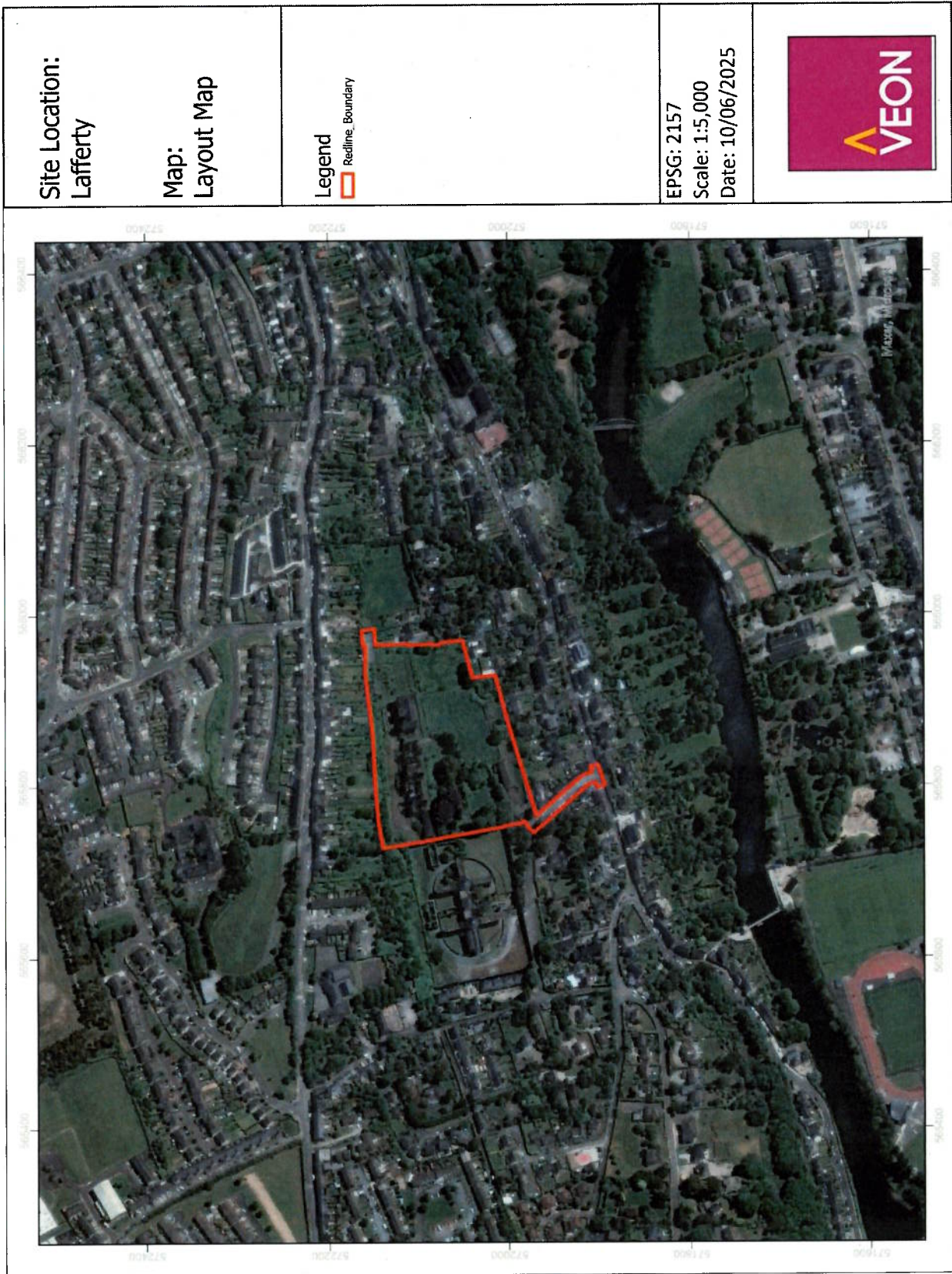


Figure 7.1: Layout and location of the proposed development site.





Figure 7.2: Wildlife trail camera deployment locations.



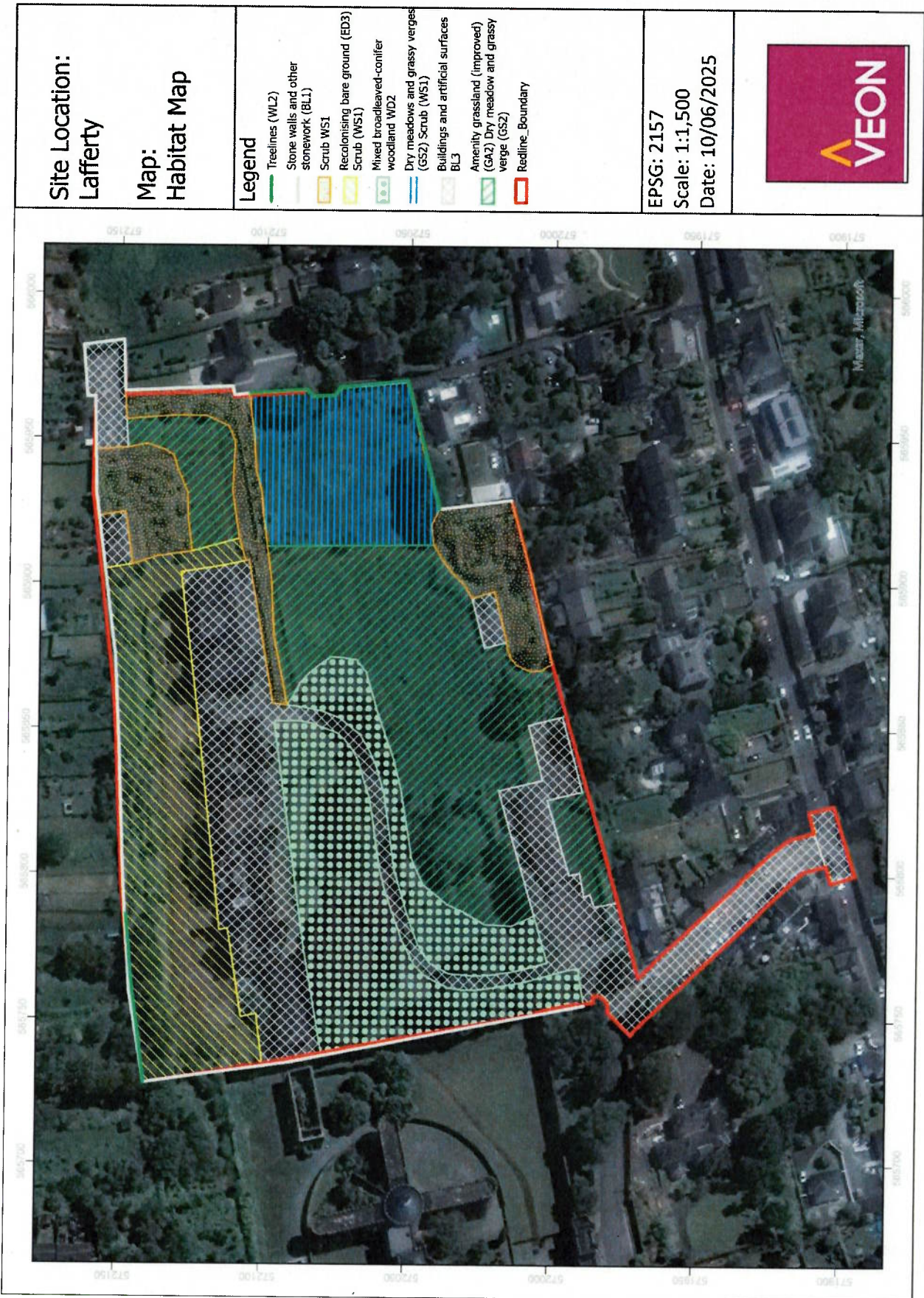


Figure 7.3: Habitat map.



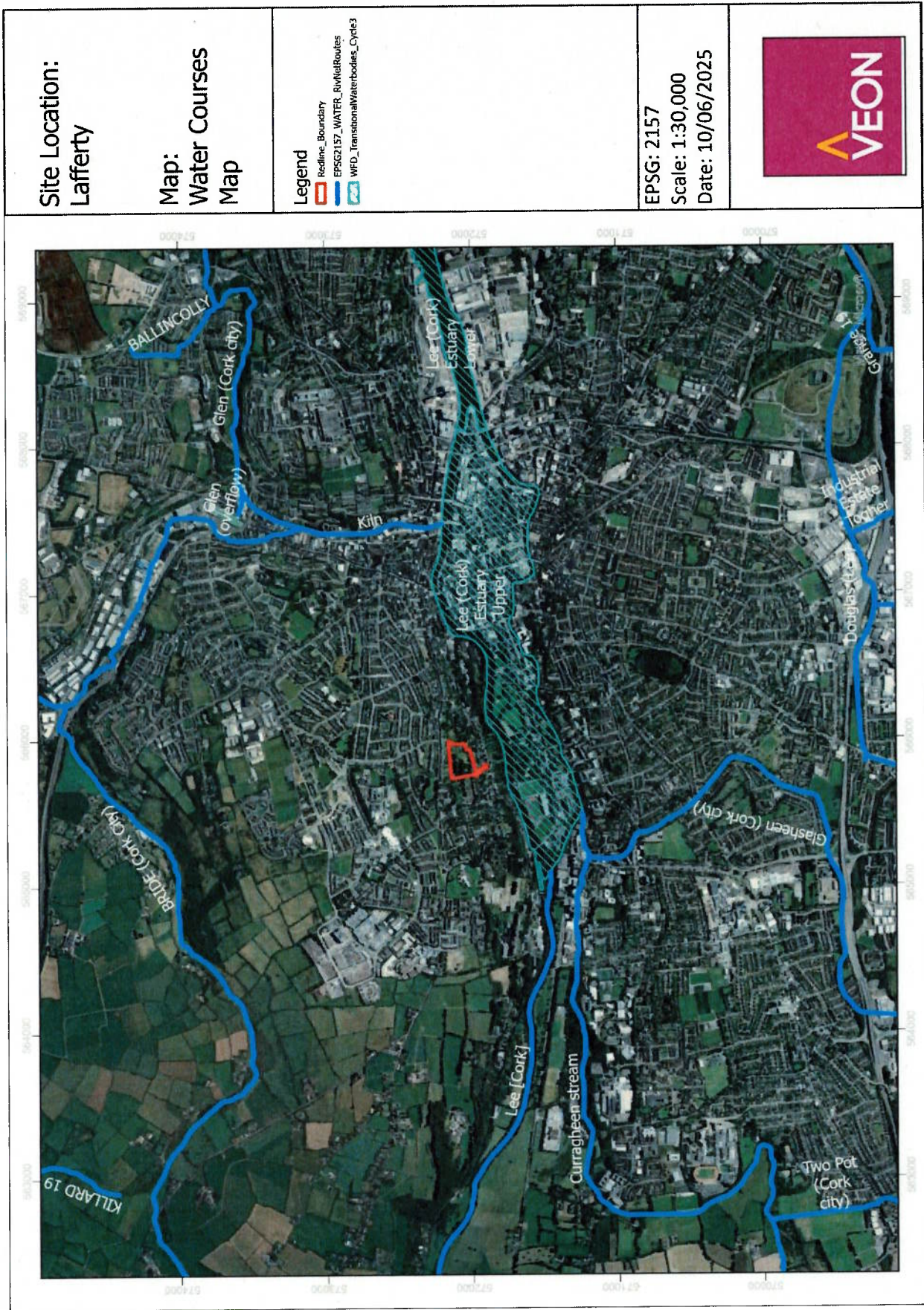


Figure 7.4: Surface water features map.



Appendix 2. PHOTOGRAPHS



*Photograph 7.1: Trail camera site No. 1.*



*Photograph 7.2: Trail camera site No. 2.*





*Photograph 7.3: Red Fox recorded on-site.*



*Photograph 7.4: Mammal trail on-site.*

