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**Observation on LRD Appeal – Case Ref: LH28.324153**  
**Planning Authority Ref: 2544442**  
**Proposed Development at Bessborough, Ballinure, Blackrock, Cork**

To whom it may concern,

I wish to make a formal observation on the above Large-scale Residential Development appeal.

I am writing to express my **strong objection** to the proposed development at the Bessborough site in its current form and at this time.

### **1. Potential for Unmarked Burials – A Matter of National Importance**

The subject lands are associated with the former Bessborough Mother and Baby Home. In light of findings from the Mother and Baby Homes Commission of Investigation and wider national awareness of burial practices at such institutions, there is a **credible and serious possibility that unmarked graves or human remains may exist within this site**.

This is not speculative or abstract. It reflects a documented national issue that has required State investigation and intervention.

As such, this site must be treated as one of potential forensic, archaeological, and human rights sensitivity.

### **2. Absence of Comprehensive Forensic and Archaeological Investigation**

There is no evidence before the Board of a **full, site-wide, forensic-led investigation** sufficient to conclusively determine whether human remains are present.

Any standard archaeological assessment is **inadequate** in this context.

A site of this nature requires:

- Detailed historical mapping and records analysis
- Non-invasive survey methods (e.g. ground-penetrating radar)
- Targeted forensic excavation where indicated
- Oversight by appropriately qualified forensic and archaeological specialists

Until such work is completed and independently verified, the suitability of the lands for development cannot be established.

### **3. Conflict with Proper Planning and Sustainable Development**

Proceeding with development in the absence of certainty regarding potential burials represents a **material planning risk**.

It gives rise to:

- The risk of disturbing human remains during construction
- The potential for works to be halted mid-development
- Legal, reputational, and ethical consequences
- Lasting harm to public confidence in the planning system

This is contrary to the principles of **proper planning and sustainable development**, which require that significant constraints are identified and addressed **before** consent is granted.

#### 4. Cultural Heritage and National Policy Context

The Bessborough site forms part of a deeply significant chapter in Ireland's social history.

Planning policy at national and local level supports:

- The protection of archaeological heritage
- The safeguarding of sites of cultural and historical importance
- A precautionary approach where uncertainty exists

Given the site's history, a precautionary and protective approach is clearly warranted.

Failure to do so risks undermining broader State commitments to truth, recognition, and respectful treatment of sites linked to institutional history.

#### 5. Prematurity of the Application

This application is **premature**.

No development of this scale should be permitted until:

- A comprehensive forensic and archaeological investigation has been completed
- Any human remains have been identified and treated with dignity
- The findings are made publicly available
- Appropriate engagement with survivors and affected families has taken place

Advancing development ahead of these steps would be inappropriate and potentially irreversible.

#### 6. Need for Preservation and Memorialisation

Given the likely sensitivity of the lands, serious consideration should be given to:

- The preservation of all or part of the site
- The development of a respectful memorial space
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This would align with national efforts towards acknowledgment, dignity, and remembrance.

The current proposal does not adequately address this dimension.

#### 7. Conclusion

For the reasons set out above, I respectfully request that An Bord Pleanála **refuse permission for the proposed development**.

At a minimum, it would be inappropriate to grant permission in the absence of:

- Full and verified investigation of the site
- Clarity regarding the presence or absence of human remains
- A considered and respectful framework for the treatment of any findings

The potential presence of unmarked burials represents a **fundamental constraint** on development that has not been adequately addressed.

Granting permission in these circumstances would be contrary to the principles of proper planning, sustainable development, and the responsible stewardship of historically significant lands.

Yours faithfully,

Louise Lotty