



Planning Ref: 245321

15 August 2024

Cork County Council,  
Planning and Development,  
County Hall,  
Carrigrohane Road,  
Cork.  
T12 R2NC

Dear Sir/Madam

**Re:245321 Permission to extend the existing burial ground, the works will consist of the following: 1) construction of new boundary along the southeastern boundary of the extended burial ground, 2) construction of access road along the southeastern boundary of the extended burial ground, 3) completion of all cut and fill of the ground required to create a usable cemetery, 4) all associated site works at St. Gobnait's Cemetery, Glebe, Ballymakeera, Ballyvourney, Co.Cork**

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development control and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council have considerable concern regarding this planning application. There are several heritage assets that are located within and adjacent to the site. There are 11 national monuments immediately surrounding the site, with the ensemble associated with St Gobnait's Church, Shrine and Penitential Station of particular importance. The Zone of Notification for these archaeological features overlaps with the red line boundary of the proposed development site.

The site boundary, as demarcated, also overlaps with the *St. Gobnait's Wood Special area of Conservation (SAC)*. The qualifying interests for this SAC is the priority Habitat 91A0 *Old sessile oak woods with Ilex and Blechnum*. The Conservation Objectives for this site is to "*restore the favourable conservation condition of Old sessile oak woods with Ilex and Blechnum*" in St. Gobnait's Wood SAC. There are several targets for achieving this including, the following:

- The Habitat Area should be stable or increasing, subject to natural processes
- Habitat Distribution should see no decline

**Baill na Comhairle | Council Members**

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Deirdre McDermott, Dr. Patricia O Hare, John G.  
Pierce, Sheila Pratschke, Prof. Mark Scott,  
Dr. Mary Tubridy

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- Woodland site should be stable or increasing

The site synopsis associated with this SAC identifies that St. Gobnait's Wood is "a good example of a native woodland typical of the south-west", with stands also noted as supporting habitats for the Kerry Slug, and several species of bat.

The proposed works do not only seek the provision of additional grave plots but also works to the southeastern boundary in terms of access and boundary works. The Heritage Council cannot support this application. The application lacks survey information that is required for an application of this nature, bearing in mind the international, national and regionally important heritage assets both on the site and in the immediate vicinity.

No Appropriate Assessment Screening report has been undertaken and therefore the Heritage Council cannot assess as to whether this development is likely to negatively impact on the SAC. Given that there are works proposed along the southeastern boundary of the site, which appears to overlap with the SAC, there is concern that there will be negative impacts on the qualifying interests of the SAC. If there are no effects to the SAC, this needs to be demonstrated by adequate survey documentation, and the drawings should correctly identify the SAC in relation to the site, including the root protection area of the stand of trees. The land immediately outside the designation also appears to have semi natural and natural habitats that would be of local importance.

Notwithstanding this, the recent Article 17 report on the *Status of EU Protected Habitats and Species in Ireland* indicates the status for 91A0 (Old Oak Woodland) is assessed as having an overall status of Bad with a deteriorating trend. It cannot be demonstrated that this proposal avoids further damage to this habitat, whose trend needs to be reversed at a national level.

Furthermore, the site overlaps with the Zone of Notification of several national monuments. Given the reprofiling and removal of soil to provide the plots, as detailed in the drawing section provided with the application, there is a need for an archaeological assessment to inform any such proposals. No assessment related to Archaeological Impact has been submitted as part of the proposal.

The proposal does not comply with objective BE 15-2 and objective HE 16-5 of the Cork County Development Plan 2022-2028. It is important to note that the Heritage Council would not support any elements of the proposal that damage the qualifying interests of the SAC or the archaeological heritage of the location. Therefore, it is important to note that while identifying the significant omission of the required survey work, we are not convinced that this is an appropriate location for an extension of the cemetery. There is an existing new cemetery to the south, which is not as sensitively located, and there is a question as to why this should not have been considered for the expansion. Given the sensitivity of the site a narrative detailing alternatives considered should be submitted.

It is also indicated from the planning application form, that no pre-application discussion was undertaken with the planning authority. Concurrently, we are concerned that it is not achievable to expand the cemetery in this location, which may have been the rationale to

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locate the new cemetery to the south. With this in mind we suggest that the local authority refuse this application, which it must be said should have been deemed invalid in the first instance, rather than requiring any additional survey work at this stage, with the associated cost incurred by this. Any future application should undergo pre-application discussions with the local authority to identify a new site to provide for cemetery expansion.

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