

26th April 2022

Planning Department
South Dublin County Council
County Hall
Tallaght
Dublin 24

Re: SECTION 5 DECLARATION

Dear Sir or Madam,

Please find enclosed a section 5 declaration by John Hanlon, Sturdy Products Ltd., Blessington Industrial Estate, Blessington, Co. Wicklow. The Council is invited to consider the following exempt development question:

Is the commercial use as open storage of lands at Clonacoole, Naas Road, Clondalkin, Dublin 22 development, and if so, is it exempt development?

For clarity, this question relates to commercial use as open storage of this site without any structures on it. On the attached site location map, we have highlighted the approximate area for the open storage that extends to c. 1,360 sq.m.

The property, which is outlined red on the attached site location map, has been in commercial use (storage use by multiple companies and or private individuals) since the 1940's. The following is a summary of some of the businesses that used the property:

- Hanlon Lime Quarries at "Druim Aoibhinn", Monastery Road, Clondalkin – our client confirms this was his grandfather's business from c. 1943 and it used the site for truck parking and storage
- Truck parking for various local businesses including:-
 - (i) Holman Engineering, Naas Road;
 - (ii) Tom O Hanlon Ford Dealer Inchicore as overflow parking. He was also the main supplier of Ford cars for An Garda
 - (iii) Contractors Plant Ltd., Naas Road, Clondalkin [our client informs us that this was a Tracey family business]
- Morlon Motors (in 1970s) – used for storage of cars, service cars and vans [see various receipts attached]
- Design Experts (in early 1980s) – this was an architectural service [see copy of business card attached confirming the site address]

- Farrell's Mobile Homes (in mid 1980s) – used for storage of mobile homes including storage of third party owned mobile homes. [This company is now based at Rathcoole]
- Irish Towing Services (2000s – 2010's) – various storage [see letter dated 20th August 2018 attached]
- Tank Engineering Ltd. (mid 1990s to date) – storage [see letter dated 15th August 2018 attached]
- Eurobins Ltd. t/a Red Cow 20' Self Storage (2015 to date) – storage for companies and private individuals

Having regard to the long standing commercial use of this site, as part of the accommodation works for the Naas Road Quality Bus Corridor, ARUP Consulting Engineers acting for South Dublin County Council prepared a new site entrance that was specifically designed to accommodate truck turning movement – see A4 version of ARUP Drg. No. SK003 Rev P1 attached.

It is our client's position that the site enjoys pre-63 commercial use for open storage. On that basis, the commercial use as open storage of these lands is not development; neither a change of use nor material change of use would arise. The question is it or is it not exempt development therefore does arise.

The following documentation is submitted with this section 5:

1. A completed application form.
2. A cheque for € 80 in respect of the prescribed fee.
3. A site location map (scale 1: 1,000)
4. A site layout plan (scale 1: 500)
5. A copy of:
 - Morlon Motors receipts
 - Design Experts business card
 - Irish Towing Services letter dated 20th August 2018
 - Tank Engineering Ltd. letter dated 15th August 2018
6. A4 version of ARUP Drg. No. SK003 Rev P1
7. This cover letter.

Please acknowledge receipt of this section 5 declaration and direct all future correspondence to this office.

Regards,



Raymond O'Malley

Kieran O'Malley & Co. Ltd.

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