



# Comhairle Cathrach Chorcaí Cork City Council

Halla na Cathrach, Corcaigh - City Hall, Cork - T12 T997

Murphy Transport Ltd.,  
c/o Alan O'Callaghan,  
Coakley O'Neill Town Planning Ltd.,  
NSC Campus,  
Mahon,  
Cork.

05/10/2022

**RE: Section 5 Declaration R739/22 Murphy Transport Ltd.,  
Maryfield, Ballinlough, Cork**

A Chara,

With reference to your request for a Section 5 Declaration at the above-named property, received on 08<sup>th</sup> September 2022, I wish to advise as follows:

The Planning Authority, in view of the above and having regard to:

- Sections 2, 3 and 4 of the Planning and Development Act 2000 (as amended), and
- Articles 6, 9 and 10 and Part 1 of Schedule 2 of the Planning and Development Regulations 2001 to 2018,

It is considered that the “*the installation of a water storage tank 13.65m in diameter and 4.254m in height*” at Murphy Transport Ltd., Maryfield, Ballinlough, Cork, **IS DEVELOPMENT and IS NOT EXEMPTED DEVELOPMENT.**

Under Section 5(3)(a) of the Planning and Development Act, 2000, you may, on payment of the appropriate fee, refer this declaration for review by An Bord Pleanála within 4 weeks of the date it is issued, 05<sup>th</sup> October 2022.

Is mise le meas,

**Kate Magner**  
Development Management Section  
Community, Culture and Placemaking Directorate  
Cork City Council



**We are Cork.**

|                  |   |
|------------------|---|
| Application type | <b>SECTION 5 DECLARATION</b>  |
| Question         | <i>Whether the installation of a water storage tank 13.65m in diameter and 4.254m in height is development and if so, is it exempted development?</i> |
| Location         | Murphy Transport Ltd., Maryfield, Ballinlough, Cork   |
| Applicant        | Murphy Transport Ltd. (owners)  |
| Date             | 05/10/2022  |
| Recommendation   | <b>Is development and is not exempted development</b>   |

#### INTERPRETATION

In this report 'the Act' means the Planning and Development Act, 2000 as amended and 'the Regulations' means the Planning and Development Regulations, 2001 as amended, unless otherwise indicated.

#### 1. REQUIREMENTS FOR A SECTION 5 DECLARATION APPLICATION

Section 5(1) of the Planning and Development Act 2000 as amended states,

*5.—(1) If any question arises as to what, in any particular case, is or is not development or is or is not exempted development within the meaning of this Act, any person may, on payment of the prescribed fee, request in writing from the relevant planning authority a declaration on that question, and that person shall provide to the planning authority any information necessary to enable the authority to make its decision on the matter.*

The requirements for making a section 5 declaration are set out in the Act.

#### 2. THE QUESTION BEFORE THE PLANNING AUTHORITY

The question to the planning authority is framed using the phrasing of section 5. The applicant states in the request, "*Whether the installation of a water storage tank 13.65m in diameter and 4.254m in height is or is not development and is or is not exempted development?*".

In my opinion the intention of the request is clear, and that it is entirely reasonable to consider the question before the planning authority as being:

*Whether the installation of a water storage tank 13.65m in diameter and 4.254m in height is development and if so, is it exempted development?*

#### 3. SITE DESCRIPTION

The subject site is located on the Boreenmanna Road and measures approximately 0.88 hectares. The present use of the site is for a transport company with the storage of vehicles on site along with a number of portacabin type units. To the front of the site, Southern side, there appears to be a dwelling house with a separate vehicle access. This site is not included in the applicants red-line boundary nor is it outlined in blue on the submitted documentation. The surrounding area is predominantly residential in nature while the wider area is in agricultural use.



**4. DESCRIPTION OF THE DEVELOPMENT**

The proposed development is for the installation of a water storage tank 13.65m in diameter and 4.254m in height (which has already been constructed on site - as shown in the submitted ‘Planning Statement’).

**5. RELEVANT PLANNING HISTORY**

TP 09/34143 Permission REFUSED to construct a 17 metre monopole to carry 3 no antennae and 1 no dish together with associated equipment cabinets and fencing at Murphys Transport, Maryfield, Ballinlough Road, Cork.

TP 09/33936 Permission REFUSED to construct a 20 metre monopole to carry 3 no antennae and 1 no dish together with associated equipment, cabinets and fencing at Murphys Transport, Maryfield, Ballinlough Road, Cork.

**Adjoining Properties**

TP 21/39913 Permission GRANTED for changes, to approved planning permission 17/37288 and subsequent approved permission 18/38195, to replace 4 no. townhouses (previously units 72-75 in permission 18/38195) with 1 no. terraced duplex block, totalling 8 units, resulting in overall increase in units for whole development from 75 to 79 units at Aylesbury Development, (Former Telecom Site), Churchyard Lane, Cork.

TP 18/38195 Permission GRANTED for changes to planning application 17/37288, to change the number of units, mix, house levels and layout of phase 2, increasing the number of units in the overall development (phase 1 and 2) from 74 to 75 residential units and all associated site works. Phase 2, increasing from 45 to 46 units at Former Telecom Site, Churchyard Lane, Ballinlough, Cork.

TP 17/37288 Permission GRANTED for the redevelopment of the Former Telecom site at Churchyard lane, Ballinlough, Cork, for the construction of 73 no. residential units including 5 no. 4 bedroom detached units, 6 no. 3 bedroom semi-detached units, 35 no. 4 bedroom townhouses, 24 no. duplex units (consisting of 12 no. 2 bed apartments and 12 no. 3 bed duplex units) and 3 no.3 bedroom town houses. Access to the proposed development is to be provided to the east off Churchyard Lane. The proposed development includes, but is not limited to, the demolition of all existing structures, landscaping and all associated site works at the Former Telecom site at Churchyard lane, Ballinlough, Cork.

PL 28.230018 (TP 07/32495) Permission GRANTED for the redevelopment of the telephone depot, Churchyard Lane, Ballinlough, to provide for 155 residential units, a creche and all associated site works. The proposed development includes the demolition of all existing structures , the construction of 28 no. conventional dwellings and 127 no. apartments. The proposed apartments including 23 no. 1 bedroom apartments , 84 no. 2 bedroom apartments and 20 no. 3 bedroom apartments will be provided in 5 no. 5 storey structures one of which will accommodate a 180m2 creche at ground floor parking level. Paring for the proposed apartments will be provided in a single basement carpark beneath proposed Building D and by surface spaces. Access to the development will be by the existing entrance to Churchyard Lane at The telephone depot, Churchyard Lane, Ballinlough, Cork.

- TP 06/30479 Permission GRANTED to provide domestic automatic security gates and pedestrian gate, erect front porch entrance canopy and construct two number rear kitchen extensions to ground floor apartments at 1 & 2 Kinsbury, Ballinlough Road, Cork
- TP 00/24224 Permission GRANTED for demolition of existing store and erection of single dwelling at Laurel Cottage, Ballinlough Road, Ballinlough, Cork.
- TP 99/23570 Permission REFUSED for duplex development of 3 no. apts and 3 no. houses with ancillary works at Owenville, Ballinlough Road, Ballinlough, Cork.
- TP 99/22867 Permission GRANTED for additional office accommodation at Telecom Eireann, Churchyard Lane, Ballintemple, Cork.

## 6. LEGISLATIVE PROVISIONS

### 6.1 Planning and Development Act, 2000 as amended

#### **Section 2(1)**

*“exempted development” has the meaning specified in section 4.*

*“structure” means any building, structure, excavation, or other thing constructed or made on, in or under any land, or any part of a structure so defined, and—*

- (a) where the context so admits, includes the land on, in or under which the structure is situate, and*
- (b) in relation to a protected structure or proposed protected structure, includes—*
  - (i) the interior of the structure,*
  - (ii) the land lying within the curtilage of the structure,*
  - (iii) any other structures lying within that curtilage and their interiors, and*
  - (iv) all fixtures and features which form part of the interior or exterior of any structure or structures referred to in subparagraph (i) or (iii).*

*“works” includes any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal and, in relation to a protected structure or proposed protected structure, includes any act or operation involving the application or removal of plaster, paint, wallpaper, tiles or other material to or from the surfaces of the interior or exterior of a structure.*

#### **Section 3(1)**

*In this Act, “development” means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in the use of any structures or other land.*

#### **Section 4(1)(h)**

*4.(1) The following shall be exempted developments for the purposes of this Act—*

*...*

*(h) development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures;*



**Section 4(2)**

Section 4(2) provides that the Minister may, by regulations, provide for any class of development to be exempted development. The principal regulations made under this provision are the Planning and Development Regulations 2001, as amended.

**Section 4(3)**

*A reference in this Act to exempted development shall be construed as a reference to development which is—*

- (a) any of the developments specified in subsection (1), or*
- (b) development which, having regard to any regulations under subsection (2), is exempted development for the purposes of this Act.*

**Section 5(1)**

See section 1 of this report.

**6.2 Planning and Development Regulations 2001 to 2018 as amended**

**Article 5(2)**

*In Schedule 2, unless the context otherwise requires, any reference to the height of a structure, plant or machinery shall be construed as a reference to its height when measured from ground level, and for that purpose “ground level” means the level of the ground immediately adjacent to the structure, plant or machinery or, where the level of the ground where it is situated or is to be situated is not uniform, the level of the lowest part of the ground adjacent to it.*

**Article 6(1)**

*Subject to article 9, development of a class specified in column 1 of Part 1 of Schedule 2 shall be exempted development for the purposes of the Act, provided that such development complies with the conditions and limitations specified in column 2 of the said Part 1 opposite the mention of that class in the said column 1.*

**Article 9**

Article 9 sets out restrictions on exemptions specified under article 6.

**(Article 6) Schedule 2, Part 1, Class 1**

Classes 21 and 22 relate to development for industrial purposes.

## Schedule 2, Part 1, Class 1

## Exempted Development — General

| Column 1<br>Description of Development  | Column 2<br>Conditions and Limitations   |
|---|--|
| <p><i>Development for industrial purposes</i></p> <p><b>CLASS 21</b></p> <p><i>(a) Development of the following descriptions, carried out by an industrial undertaker on land occupied and used by such undertaker for the carrying on, and for the purposes of, any industrial process, or on land used as a dock, harbour or quay for the purposes of any industrial undertaking—</i></p> <p><i>(i) the provision, rearrangement, replacement or maintenance of private ways or private railways, sidings or conveyors,</i></p> <p><i>(ii) the provision, rearrangement, replacement or maintenance of sewers, mains, pipes, cables or other apparatus,</i></p> <p><i>(iii) the installation or erection by way of addition or replacement of plant or machinery, or structures of the nature of plant or machinery.</i></p> <p><i>(b) Any works for the provision within the curtilage of an industrial building of a hard surface to be used for the purposes of or in connection with the industrial process carried on in the building.</i></p> | <p>1. Any such development shall not materially alter the external appearance of the premises of the undertaking.</p> <p>2. The height of any plant or machinery, or any structure in the nature of plant or machinery, shall not exceed 15 metres above ground level or the height of the plant, machinery or structure replaced, whichever is the greater.</p> |
| <p><b>CLASS 22</b></p> <p><i>Storage within the curtilage of an industrial building, in connection with the industrial process carried on in the building, of raw materials, products, packing materials or fuel, or the deposit of waste arising from the industrial process.</i></p>  | <p><i>The raw materials, products, packing materials, fuel or waste stored shall not be visible from any public road contiguous or adjacent to the curtilage of the industrial building.</i></p>   |



## 7. ASSESSMENT

### 7.1 Development

The first issue for consideration is whether or not the matter at hand is ‘development’, which is defined in the Act as comprising two chief components: ‘works’ and / or ‘any material change in the use of any structures or other land’.

‘Works’ is defined in section 3(1) of the Act as including ‘any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal’. It is considered that the installation of a water storage tank constitutes ‘works’ as it comprises the construction of a water storage tank. As the proposal comprises ‘works’, it is clearly therefore ‘development’ within the meaning of the Act.

### CONCLUSION

#### Is development

### 7.2 Exempted development

The next issue for consideration is whether or not the matter at hand is exempted development. Section 2(1) of the Act defines ‘exempted development’ as having ‘the meaning specified in section 4’ of the Act (which relates to exempted development).

Section 4(3) of the Act states that exempted development either means development specified in section 4(1) or development which is exempted development having regard to any regulations under section 4(2).

I consider that the proposal comes within **subsection (2) of section 4**, i.e. the Regulations, and not subsection (1).

#### Section 4(1)

I do not consider that the proposal comes within the scope of section 4(1) of the Act.

#### Section 4(2)

It is therefore necessary to consider whether the works come under the scope of section 4(2) (i.e. exemptions specified in the Regulations), having regard to the use of the word ‘or’ in section 4(3).

I do not consider that article 6 and Class 22 would apply in this instance, as the works do not comprise of the storage of raw materials, products, packing materials or fuel, or the deposit of waste arising from the industrial process, but is rather for the construction of a storage tank on the site.

I consider that article 6 and **Class 21** applies, as the installation of a water storage tank is considered to be a development in the category of “*the installation or erection by way of addition or replacement of plant or machinery, or structures of the nature of plant or machinery*” “*carried out by an industrial undertaker on land occupied and used by such undertaker for the carrying on, and for the purposes of, any industrial process, or on land used as a dock, harbour or quay for the purposes of any industrial undertaking*”.

Having assessed the proposed extension against Class 21 and its conditions and limitations I find as follows:

*Condition / Limitation 1*

The tank is clearly visible from the public roadway (as is shown in documents provided). While it is noted that previously a number of tanks/trailers would be stored in this location on the site (as stated in the documents provided), it is considered that the storage of these tanks/trailers was a more transient use and were not a permanent, fitted fixture in this location and could be moved/removed from this location easily if required. The water tank is a permanent fixture constructed on a concrete apron and is clearly visible from the public roadway. In this regard, it is considered that the tank would materially alter the external appearance of the premises of the undertaking, and therefore is not considered to be exempted development.

*Condition / Limitation 2*

The tank is stated as being 4.254m in height (as indicated in documents provided) and therefore will not exceed the stated height of 15 metres.

**Restrictions on exemption**

I do not consider that any apply in this instance.

**CONCLUSION**

**Is not exempted development**

**8. ENVIRONMENTAL ASSESSMENT**

I note the provisions of sections 4(4), 4(4A) and 177U(9) of the Act which state,

*Section 4(4),*

*Notwithstanding paragraphs (a), (i), (ia) and (l) of subsection (1) and any regulations under subsection (2), development shall not be exempted development if an environmental impact assessment or an appropriate assessment of the development is required.*

*Section 4(4A)*

*Notwithstanding subsection (4), the Minister may make regulations prescribing development or any class of development that is—*

- (a) authorised, or required to be authorised by or under any statute (other than this Act) whether by means of a licence, consent, approval or otherwise, and*
  - (b) as respects which an environmental impact assessment or an appropriate assessment is required,*
- to be exempted development.*

*Section 177U(9)*

*In deciding upon a declaration or a referral under section 5 of this Act a planning authority or the Board, as the case may be, shall where appropriate, conduct a screening for appropriate assessment in accordance with the provisions of this section.*

**8.1 Screening for Environmental Impact Assessment**

Having regard to the contents of Article 103 and Schedule 7 of the Planning and Development Regulations 2001, as amended it is considered that the proposed development by reason of its nature, scale and location would not be likely to have significant effects on the environment. Accordingly it is considered that **environmental impact assessment is not required.**



### 8.2 Screening for Appropriate Assessment

The applicant has not submitted an appropriate assessment screening report. The relevant European sites are the Cork Harbour SPA (site code 004030) and the Great Island Channel cSAC (site code 001058). Having regard to the location of the proposed development site relative to these European sites and related watercourses and to the nature and scale of the proposed development it is considered that the proposed development would not affect the integrity of these European sites. Accordingly it is considered that **appropriate assessment is not required**.

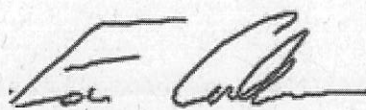
### 9. RECOMMENDATION

In view of the above and having regard to —

- Sections 2, 3, and 4 of the Planning and Development Act 2000 as amended, and
- Articles 6, 9 and 10 and Part 1 of Schedule 2 of the Planning and Development Regulations 2001 to 2018

the planning authority considers that —

the installation of a water storage tank 13.65m in diameter and 4.254m in height at Murphy Transport Ltd., Maryfield, Ballinlough, Cork **IS DEVELOPMENT** and **IS NOT EXEMPTED DEVELOPMENT**.



Eoin Cullinane  
Assistant Planner  
05/10/2022

Administrative Officer,  
Planning Department,  
Cork City Council,  
City Hall,  
Anglesea Street,  
Cork.

8<sup>th</sup> September 2022

**Cork City Council**

08 SEP 2022

**Community, Culture  
and Placemaking**

**RE: SECTION 5 DECLARATION APPLICATION, MURPHY TRANSPORT LTD., MARYFIELD, BALLINLOUGH ROAD, CORK**

Dear Sir / Madam,

We, Coakley O'Neill Town Planning Ltd of NSC Campus, Mahon, Cork, are instructed by our clients Murphy Transport Ltd, to lodge this application for a Section 5 declaration in relation to a water tank at their site at Maryfield, Ballinlough, Co. Cork.

The following items are enclosed as part of this application:

- Cheque for the sum of €80 in respect of the application fee;
- 4 no. copies of the Section 5 application form;
- 4 no. copies of layout plans and drawings;
- 4 no. copies of the OSI site location maps; and
- 4 no. copies of Planning Statement.

We trust everything is in order and look forward to a favourable decision in due course.

Please forward all correspondence in relation to this planning application to this office.

Yours sincerely,



Alan O'Callaghan  
Planning Consultant  
Coakley O'Neill Town Planning Ltd.



**COMHAIRLE CATHRACH CHORCAÍ  
CORK CITY COUNCIL**

Strategic Planning & Economic Development Directorate,  
Cork City Council, City Hall, Anglesea Street, Cork.

R-Phost/E-Mail [planning@corkcity.ie](mailto:planning@corkcity.ie)  
Fón/Tel: 021-4924564/4321  
Líonra/Web: [www.corkcity.ie](http://www.corkcity.ie)

**SECTION 5 DECLARATION APPLICATION FORM**  
under Section 5 of the Planning & Development Acts 2000 (as amended)

**1. POSTAL ADDRESS OF LAND OR STRUCTURE FOR WHICH DECLARATION IS SOUGHT**

MURPHY TRANSPORT LTD., MARYFIELD, BALLINLOUGH ROAD, CORK.

**2. QUESTION/ DECLARATION DETAILS**

**PLEASE STATE THE SPECIFIC QUESTION FOR WHICH A DECLARATION IS SOUGHT:**

*Sample Question: Is the construction of a shed at No 1 Wall St, Cork development and if so, is it exempted development?*

*Note: only works listed and described under this section will be assessed under the section 5 declaration.*

**WHETHER THE INSTALLATION OF A WATER STORAGE TANK 13.65M IN DIAMETER AND 4.254M IN HEIGHT IS OR IS NOT DEVELOPMENT AND IS OR IS NOT EXEMPTED DEVELOPMENT?**

**ADDITIONAL DETAILS REGARDING QUESTION/ WORKS/ DEVELOPMENT:**

*(Use additional sheets if required).*

**SEE ENCLOSED PLANNING STATEMENT AND DRAWINGS**

**3. APPLICATION DETAILS**

Answer the following if applicable. Note: Floor areas are measured from the inside of the external walls and should be indicated in square meters (sq. M)

|  |                                       |  |
|--|---------------------------------------|--|
| (a) Floor area of existing/proposed structure/s  | <b>TANK AREA: 135.5SQM</b>            |  |
| (b) If a domestic extension, have any previous extensions/structures been erected at this location after 1st October, 1964, (including those for which planning permission has been obtained)? | Yes <input type="checkbox"/>          | No <input checked="" type="checkbox"/> |
| If yes, please provide floor areas. (sq m)<br>_____  |                                       |  |
| (c) If concerning a change of use of land and / or building(s), please state the following:  |                                       |  |
| Existing/ previous use (please circle)   | Proposed/existing use (please circle) |  |
| N/A  | N/A                                   |  |

**4. APPLICANT/ CONTACT DETAILS**

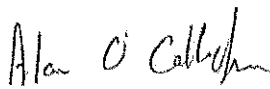
|  |                 |  |                             |
|--|-----------------|--|-----------------------------|
| Name of applicant (principal, not agent):  |                 | <b>MURPHY TRANSPORT LTD.</b>   |                             |
| Applicants Address   |                 | <b>MARYFIELD, BALLINLOUGH ROAD, CORK</b>                                 |                             |
| Person/Agent acting on behalf of the Applicant (if any):   | Name:           | <b>ALAN O'CALLAGHAN</b>  |                             |
|  | Address:        | <b>COAKLEY O'NEILL TOWN PLANNING LTD.<br/>NSC CAMPUS<br/>MAHON, CORK</b> |                             |
|  | Telephone:      | [REDACTED]   |                             |
|  | Fax:            | <b>N/A</b>   |                             |
|  | E-mail address: | [REDACTED]   |                             |
| Should all correspondence be sent to the above address?<br><small>(Please note that if the answer is 'No', all correspondence will be sent to the Applicant's address)</small> |                 | Yes <input checked="" type="checkbox"/>                                  | No <input type="checkbox"/> |

**5. LEGAL INTEREST**

|   |   |                 |
|---|---|-----------------|
| Please tick appropriate box to show applicant's legal interest in the land or structure       | <b>A. Owner</b> <input checked="" type="checkbox"/> | <b>B. Other</b> |
| Where legal interest is 'Other', please state your interest in the land/structure in question |   |                 |
| If you are not the legal owner, please state the name and address of the owner if available   |   |                 |





6. I / We confirm that the information contained in the application is true and accurate:

Signature: 

Date: 8<sup>th</sup> September 2022

7. ADDITIONAL CONTACT DETAILS

The provision of additional contact information such as email addresses or phone numbers is voluntary and will only be used by the Planning Authority to contact you should it be deemed necessary for the purposes of administering the application.

|                |   |
|----------------|---|
| Contact number |  |
| Email address  |  |

**ADVISORY NOTES**

The application must be accompanied by the required fee of €80

The application should be accompanied by a site location map which is based on the Ordnance Survey map for the area, is a scale not less than 1:1000 and it shall clearly identify the site in question.

Sufficient information should be submitted to enable the Planning Authority to make a decision. If applicable, any plans submitted should be to scale and based on an accurate survey of the lands/structure in question.

The application should be sent to the following address:

The Development Management Section, Strategic Planning & Economic Development Directorate, Cork City Council, City Hall, Anglesea Street, Cork.

- The Planning Authority may require further information to be submitted to enable the authority to issue the declaration.
- The Planning Authority may request other person(s) other than the applicant to submit information on the question which has arisen and on which the declaration is sought.
- Any person issued with a declaration may on payment to An Bord Pleanála refer a declaration for review by the Board within 4 weeks of the date of the issuing of the declaration.
- In the event that no declaration is issued by the Planning Authority, any person who made a request may on payment to the Board of such a fee as may be prescribed, refer the question for decision to the Board within 4 weeks of the date that a declaration was due to be issued by the Planning Authority.

*The application form and advisory notes are non-statutory documents prepared by Cork City Council for the purpose of advising as to the type information is normally required to enable the Planning Authority to issue a declaration under Section 5. This document does not purport to be a legal interpretation of the statutory legislation nor does it state to be a legal requirement under the Planning and Development Act 2000, as amended.*



COAKLEY O'NEILL  
town planning

# Planning Statement

Ballinlough, Co. Cork

Prepared in September 2022 on behalf of

**Murphy Transport Ltd.**

Coakley O'Neill Town Planning Ltd.

📍 NSC Campus, Mahon, Cork

☎ 021 2307000

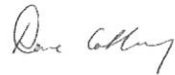

✉ [info@coakleyoneill.ie](mailto:info@coakleyoneill.ie)

🌐 [www.coakleyoneill.ie](http://www.coakleyoneill.ie)



## Document Control Sheet

|                 |                              |
|-----------------|------------------------------|
| Client          | Murphy Transport             |
| Project Title   | Ballinlough Enforcement      |
| Job No.         | CON22028                     |
| Document Title  | Section 5 Planning Statement |
| Number of Pages | 16                           |

| Revision | Status | Date of Issue                  | Authored | Checked | Signed  |
|----------|--------|--------------------------------|----------|---------|---|
| 1        | Draft  | 8 <sup>th</sup> September 2022 | AOC      | DC      |   |
| 2        | Final  | 8 <sup>th</sup> September 2022 | AOC      | DC      |  |

### Confidentiality Statement

*This report has been produced for the exclusive use of the commissioning party and unless otherwise agreed in writing by Coakley O'Neill Town Planning Ltd., no other party may copy, reproduce, distribute, make use of, or rely on the contents of the report. No liability is accepted by Coakley O'Neill Town Planning Ltd. for any use of this report, other than for the purposes for which it was originally prepared and provided. Opinions and information provided in this report are on the basis of Coakley O'Neill using due skill, care and diligence in the preparation of same and no explicit warranty is provided as to their accuracy. It should be noted and is expressly stated that no independent verification of any of the documents or information supplied to Coakley O'Neill Town Planning Ltd. has been made.*

Maps reproduced under Ordnance Survey Ireland Licence Number CYAL50275684

## 1.0 Introduction

- 1.1 We, Coakley O'Neill Town Planning Ltd., NSC Campus, Mahon, Cork, have been instructed by Murphy Transport Ltd. to prepare this report with respect to an application seeking a Section 5 declaration as to whether the installation of a water storage tank 13.65m in diameter and 4.254m in height which is located within the footprint of the existing premises of Murphy Transport Ltd., Ballinlough, Cork is or is not development and is or is not exempted development.
- 1.2 The report has had regard to the relevant planning policy documents regulating the development of the site, including the Planning and Development Act 2000, as amended, the Planning and Development Regulations 2001, as amended, the Cork City Development Plan 2022 and various Ministerial Guidelines and Circulars, the decisions of An Bord Pleanála on similar proposals, the site's planning history and other planning precedence, where relevant.

## 2.0 SITE LOCATION AND DESCRIPTION

- 2.1 The lands in the ownership of Murphy Transport Ltd. occupy an area of c.0.881ha within the suburb of Ballinlough. The site is a long established transport depot which generally comprises of prefabricated office space along its western boundary, corrugated sheds with internal tank washes which are centrally located within the site, a storage warehouse along its northern boundary, along with an external yard area for the storage of tanks and tanks.
- 2.2 The site is located on the northern side of Ballinlough Road. The surrounding area consists of the under construction Aylesbury Estate to the north and east with Cork Constitution Rugby Club further north of this again, Shrewsbury Estate to the immediate west, Ballinlough Road to the south with a number of residential estates further south of this. There is a ribbon of small scale commercial businesses and Ballinlough GAA Pitch to the west along Ballinlough Road. Further west of this are densely populated residential estates.
- 2.3 The site is not located within a flood risk zone, nor have there been any recorded flooding events in the past.
- 2.4 There are no national monuments on site along with any protected structures. Furthermore, the site is not in close proximity to any sites that form part of the Natura 2000 network which would require consideration.

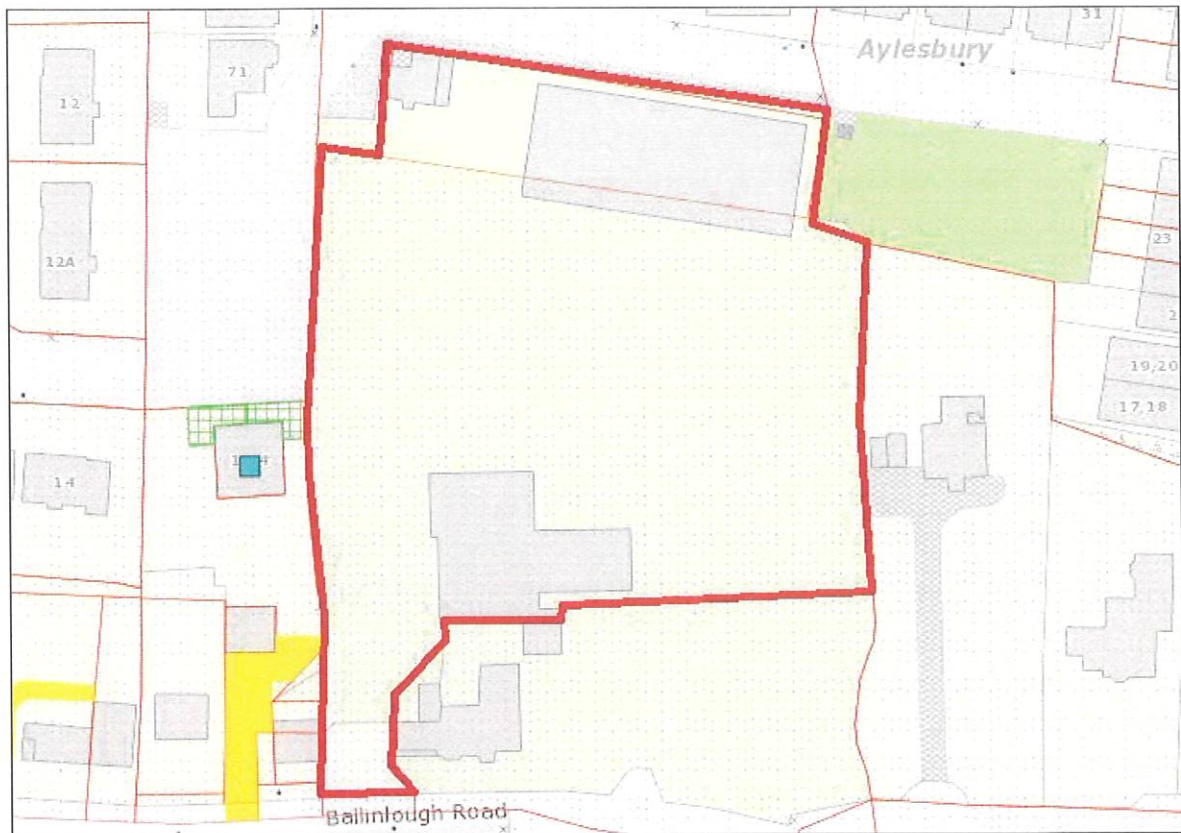


Figure 1 – Site location generally outlined in red in context of surrounding area.



Plate 1 – View of tank from Ballinlough Road



Plate 2 – Tank facing south east





Plate 3 – Access ladder facing west



Plate 4 – Existing residential property to south west



Plate 5 – Water tank as constructed facing south east



Plate 6 – Water tank as constructed facing south

### 3.0 PLANNING POLICY AND PROVISIONS

3.1 The recently adopted **Cork City Development Plan, 2022 (CCDP)** governs the ongoing development of the subject site.

3.2 In this context, the site forms part of the **ZO 01 – 'Sustainable Residential Neighbourhood'** zoning designation within Ballinlough, which forms part of Map 6 of the south eastern suburbs of the City.

3.3 The objective of which is as follows:

*To protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses.*

3.4 It is worth noting that the subject lands have formed part of the Murphy family's family run business since it was founded in 1956 focused on road haulage. Over the years the company has grown and diversified, and they have long provided services such as truck washing, tank washing, trailer rental, tank rental, vehicle maintenance and the loading and off-loading of containers.

3.5 In the context of the site's current zoning and its existing use, the transport depot can be judged to be considered an established and permitted use, albeit non-conforming with the primary objective of its zoning.

3.6 **Section 12.8** of the CCDP notes the following with respect to non-conforming uses;

*Land use zonings are used as a tool to shape the City's development strategy, and therefore may not always reflect established land uses. As a result, there are uses throughout the City that do not conform with the land use zoning objective for the area.*

3.7 While **section 12.9** states;

*Where such non-conforming uses are legally established, their reasonable expansion or improvement within their curtilage will be considered on their own merits provided there is no serious detrimental impact on the primary land use zoning objective for the area or environment, having regard to other relevant objectives of this Plan.*

#### 4.0 PLANNING HISTORY

4.1 The available planning history of the site is limited to the following:

- **Application Register Reference - 09/33936**  
to construct a 20 metre monopole to carry 3 no antennae and 1 no dish together with associated equipment, cabinets and fencing.  
**Refused on the 4<sup>th</sup> August 2009**
- **Application Register Reference – 09/34143**  
to construct a 17 metre monopole to carry 3 no antennae and 1 no dish together with associated equipment cabinets and fencing.  
**Refused on the 3<sup>rd</sup> December 2009**

#### 5.0 PLANNING AND DEVELOPMENT LEGISLATIVE CONTEXT

5.1 The control of development is regulated by the *Planning and Development Act 2000*, as amended and the *Planning and Development Regulation 2001*, as amended, which set out whether, and in which instances, certain types of development require planning permission. They also set out the circumstances under which certain types of development are considered exempt from the requirement to obtain planning permission.

5.2 The following extracts from the Act are considered relevant:

**Section 2** of the Act "*structure*" means any building, structure, excavation, or other thing constructed or made on, in or under land, or any part of a structure so defined, and – (a) where the context so admits, includes the land on, in or under which the structure is situate...

**Section 2** defines "use", in relation to land, does not include the use of land by the carrying out of any works thereon;

**Section 3(1)** of the Act states the following: "*development*" means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in the use of any structures or other land.

5.3 **Section 4** of the Act identifies development which shall constitute exempted development, not requiring planning permission under Section 32.

5.4 More specifically, **Section 4(1)(h)** sets out the following exemption:

*Development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do*



*not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures.*

5.5 **Section 4 (4)** of the Act states with regard to exempted development and environmental considerations:

*Notwithstanding paragraphs (a), (i), (ia) and (l) of subsection (1) and any regulations under subsection (2), development shall not be exempted development if an environmental impact assessment or an appropriate assessment of the development is required.*

5.6 In addition to the specified exemptions in the Act, **Section 4(2)** of the Act provides that the Minister may make Regulations to provide for any class of development being exempted development

5.7 In this regard, the *Planning and Development Regulations 2001, as amended* set out the main criteria when deciding whether development is exempt from planning permission or not. Article 5 of the Regulations provide the following definitions:

**"industrial building"** means a structure (not being a shop, or a structure in or adjacent to and belonging to a quarry or mine) used for the carrying on of any industrial process;

**"industrial process"** means any process which is carried on in the course of trade or business, other than agriculture, and which is-

(a) for or incidental to the making of any article or part of an article, or

(b) for or incidental to the altering, repairing, ornamenting, finishing, cleaning, washing, packing, canning, adapting for sale, breaking up or demolition of any article, including the getting, dressing or treatment of minerals,

and for the purposes of this paragraph, "article" includes-

(i) a vehicle, aircraft, ship, or vessel, or

(ii) a sound recording, film, broadcast, cable programme, publication and computer program or other original database;

**"industrial undertaker"** means a person by whom an industrial process is carried on and "industrial undertaking" shall be construed accordingly;

5.8 **Article 9** of the Regulations sets out restrictions on exemption and includes the following:

*Development to which Article 6 relates shall not be exempted development for the purposes of the Act –*

(a) *If the carrying out of such development would:*

(i) *contravene a condition attached to a permission under the Act or be inconsistent with any use specified in a permission under the Act".*

(ii) *endanger public safety by reason of traffic hazard or obstruction of road users,*

(vi) interfere with the character of a landscape, or a view or prospect of special amenity value or special interest, the preservation of which is an objective of a development plan for the area in which the development is proposed or, pending the variation of a development plan or the making of a new development plan, in the draft variation of the development plan or the draft development plan,

(vii) consist of or comprise the excavation, alteration or demolition (other than peat extraction) of places, caves, sites, features or other objects of archaeological, geological, historical, scientific or ecological interest, the preservation, conservation or protection of which is an objective of a development plan or local area plan for the area in which the development is proposed or, pending the variation of a development plan or local area plan, or the making of a new development plan or local area plan, in the draft variation of the development plan or the local area plan or the draft development plan or draft local area plan,

(viiA) consist of or comprise the excavation, alteration or demolition of any archaeological monument included in the Record of Monuments and Places, pursuant to section 12 (1) of the National Monuments (Amendment) Act 1994, save that this provision shall not apply to any excavation or any works, pursuant to and in accordance with a consent granted under section 14 or a licence granted under section 26 of the National Monuments Act 1930 (No. 2 of 1930) as amended,

(viiB) comprise development in relation to which a planning authority or An Bord Pleanála is the competent authority in relation to appropriate assessment and the development would require an appropriate assessment because it would be likely to have a significant effect on the integrity of a European site,

(viiC) consist of or comprise development which would be likely to have an adverse impact on an area designated as a natural heritage area by order made under section 18 of the Wildlife (Amendment) Act 2000.

(viii) consist of or comprise the extension, alteration, repair or renewal of an unauthorised structure or a structure the use of which is an unauthorised use,

(c) if it is development to which Part 10 applies, unless the development is required by or under any statutory provision (other than the Act or these Regulations) to comply with procedures for the purpose of giving effect to the Council Directive,

(d) if it consists of the provision of, or modifications to, an establishment, and could have significant repercussions on major accident hazards.

5.9 **Article 10(2)(a)** of the Regulations states that a use which is ordinarily incidental to any use specified in Part 4 of Schedule 2 is not excluded from that use as an incident thereto merely by reason of its being specified in the said Part of the said Schedule as a separate use.

5.10 Under **Article 151** of the Regulations, the following is set out

(1) Where a planning authority receives a request for a declaration under section 5 of the Act relating to the provision of, or modifications to, an establishment, and, in the opinion of the

authority, the development could have significant repercussions on major accident hazards, the authority shall send notice to the Health and Safety Authority

(2) A notice sent by a planning authority under sub-article (1) shall—

(a) issue as soon as may be following receipt of the request for a declaration,

(b) include a copy of the relevant request for a declaration,

(c) request technical advice on the effects of the proposed development on the risk or consequences of a major accident.

5.11 Development for Industrial Purposes that are noted as Exempted Development in the Regulations are marked under Class 21 and 22, as shown in the table below:

| Description of Development   | Conditions and Limitations   |
|--|--|
| <p><b>Class 21</b></p> <p>(a) Development of the following descriptions, carried out by an industrial undertaker for the carrying on, and for the purposes of, any industrial process, or on land used as a dock, harbour or quay for the carrying on, and for the purposes of, any industrial process, or on land used as a dock, harbour or quay for the purposes of any industrial undertaking—</p> <p>(i) the provision, rearrangement, replacement or maintenance of private ways or private railways, sidings or conveyors,</p> <p>(ii) the provision, rearrangement, replacement or maintenance of sewers, mains, pipes, cables or other apparatus,</p> <p>(iii) the installation or erection by way of addition or replacement of plant or machinery, or structures of the nature of plant or machinery.</p> <p>(b) Any works for the provision within the curtilage of an industrial building of a hard surface to be used for the purposes of or in connection with the industrial process carried on in the building.</p> | <p>1. Any such development shall not materially alter the external appearance of the premises of the undertaking.</p> <p>2. The height of any plant or machinery, or any structure in the nature of plant or machinery, shall not exceed 15 metres above ground level or the height of the plant, machinery or structure replaced, whichever is the greater.</p> |
| <p><b>Class 22</b></p> <p>Storage within the curtilage of an industrial building, in connection with the industrial process carried on in the building, of raw materials, products, packing materials or fuel, or the deposit of waste arising from the industrial process.</p>  | <p>The raw materials, products, packing materials, fuel or waste stored shall not be visible from any public road contiguous or adjacent to the curtilage of the industrial building.</p>  |



## 6.0 AN BORD PLEANÁLA REFERRAL PRECEDENCE

6.1 Because of the nature of the decisions on exempted development, questions arising from similar core facts will be subject to the same legal principles and will give rise to the same conclusions. In general terms therefore, and while acknowledging that each case must be decided on its merits, the decisions of Cork City Council, and An Bord Pleanála on referral, regarding exempted development constitute a series of precedents which provide guidance for applicants and planning authorities.

6.2 It should be noted that there are no specific referral decisions at An Bord Pleanála in relation to the matter arising in this instance.

## 7.0 PROPOSAL, CONTEXT AND DISCUSSION

7.1 The declaration sought in this instance seeks to establish whether the erection of a water tank within the transport depot constitutes development, and whether this is or is not exempted development. We respectfully submit in this instance that the water tank can be classed as exempted development. We outline our reasoning below.

7.2 Works began in December 2021 while the tank was installed in January 2022 at its current location on the southern boundary of the site. It has not yet been commissioned for use. Previous to this, washed tanks and trailers were parked in this area. This can be confirmed by viewing an aerial view of the site on Google Earth, shown below. The trees seen were removed in 2018/2019 as they were shedding into washed tanks leading to customers refusing to take tanks with evidence of leaves or other pieces of foliage.

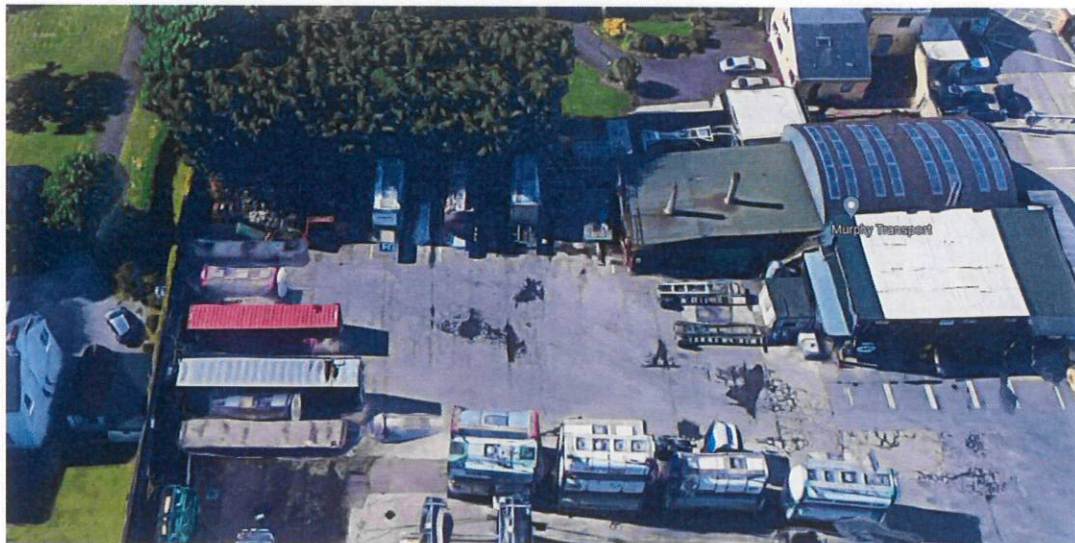


Figure 2: Aerial Image of Site Extracted from Google

- 7.3 The water storage tank measures 13.65m in diameter and 4.254m in height and helps with the daily operation of the transport depot, more specifically with respect to the cleaning and washing of trucks and tanks.
- 7.4 The installation of the tank can be found to be development by virtue of being an *act or operation of construction, excavation, demolition, extension, alteration, repair or renewal*.
- 7.5 The inference in Section 32(2) of the Planning and Development Act 2000, as amended is that only development which is exempt, or which is in accordance with a permission, should be carried out. Other development would be considered unauthorised development. The key consideration therefore is whether the installation can avail of exemption under the planning legislation.
- 7.6 As set out above, there are exemptions available under both the Planning Acts and the Planning Regulations. Under the Regulations, Classes 21 and 22 relate to industrial development. Given the nature of the development, both Class 21 and 22 are of relevance.

#### **Class 21**

(a) *Development of the following descriptions, **carried out by an industrial undertaker** for the carrying on, and **for the purposes of, any industrial process**, or on land used as a dock, harbour or quay for the carrying on, and for the purposes of, any industrial process, or on land used as a dock, harbour or quay for the purposes of any industrial undertaking—*

- (i) *the provision, rearrangement, replacement or maintenance of private ways or private railways, sidings or conveyors,*
- (ii) *the provision, rearrangement, replacement or maintenance of sewers, mains, pipes, cables or other apparatus,*
- (iii) **the installation or erection by way of addition or replacement of plant or machinery, or structures of the nature of plant or machinery.**

(b) *Any works for the provision within the curtilage of an industrial building of a hard surface to be used for the purposes of or in connection with the industrial process carried on in the building.*

#### **Class 22**

**Storage within the curtilage of an industrial building**, in connection with the industrial process carried on in the building, **of raw materials, products, packing materials or fuel**, or the deposit of waste arising from the industrial process.

- 7.7 It is evident that the development relates to an industrial undertaker involved in an industrial process, more specifically with respect to being *for or incidental to the altering, repairing, ornamenting, finishing, cleaning, washing, packing, canning, adapting for sale, breaking up or demolition of vehicles*. It comprises *plant or any structure in the nature of plant or machinery*.

- 7.8 The tank which is used for the storage of water used in the operation of the site, is 13.65m in diameter and 4.254m in height. It is located within the footprint of the existing premises. In this respect, it could be argued that both Class 21 and 22 can apply. Yet, on balance, as the proposal involves the specific construction works included the construction of a hard standing area it is found that Class 21 is more applicable, particularly the exemptions available under (a)(iii) and (b).
- 7.9 The water tank can be considered plant or machinery or a structure of the nature of plant or machinery. The concrete apron can be considered a hard surface within the curtilage of an industrial building to be used for the purposes of, or in connection with, the industrial process carried on in the building.
- 7.10 The key consideration therefore centres around the restrictions on exemption outlined in Class 21:
- 1. Any such development shall not materially alter the external appearance of the premises of the undertaking.*
  - 2. The height of any plant or machinery, or any structure in the nature of plant or machinery, shall not exceed 15 metres above ground level or the height of the plant, machinery or structure replaced, whichever is the greater.*
- 7.11 The tank and hardstanding can be confirmed as meeting the requirements of Class 21, being in keeping with the nature of structures on the site, it does not materially alter the external appearance of the premises and the height of the structure is well within the 15m limit set out.
- 7.12 The development carried out has to **materially** alter the external appearance of the premises of the undertaking.
- 7.13 While the site can be seen fleetingly from the Ballinlough Road, we find that its appearance has not been materially altered.
- 7.13 The views of the transport depot with and without the water tank are depicted in Plates 7 and 8 below. The respective views are from Google Street View in 2019 and 2022.





Plate 7 – 2019 View



Plate 8 – 2022 View



- 7.11 The view of the site from the public road in 2019 shows storage tanks parked on the southern boundary in accordance with the established use of the site. The view in 2022, reveals an entirely similar view, albeit it now shows a single storage water tank. On this basis, we submit that the external appearance of the site has not changed in any material way. In fact, a photo from February 2022, shows both tanks viewed from the public road - the water tank and the other storage tanks to its side and rear.



Plate 9 – Photo of View from February 2022

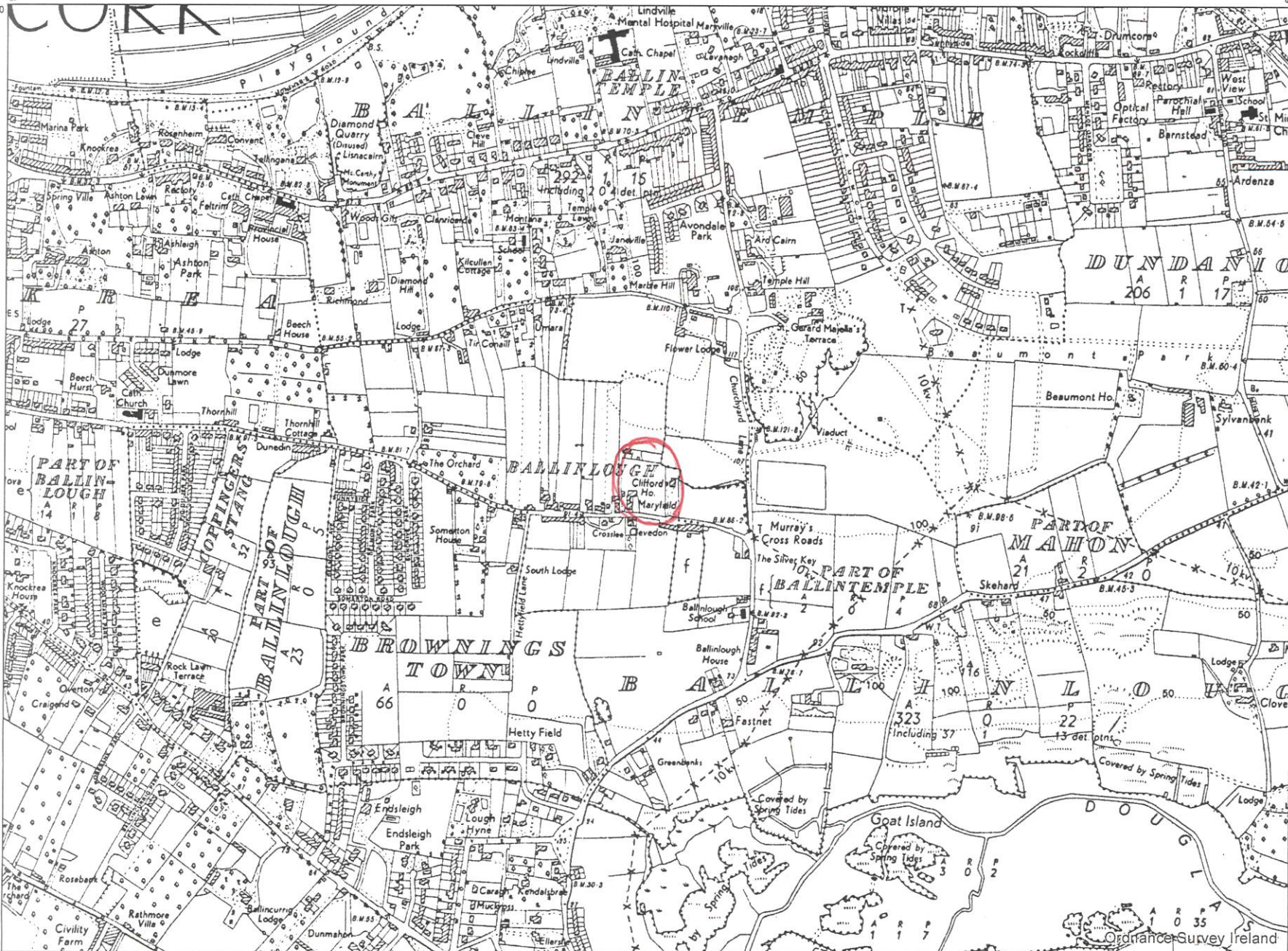
- 7.12 Therefore, while the proposal will alter the external appearance of the premises, we do not consider that it will do so materially, being in keeping with the previous view. As such, as one travels on the public road, there will be no significant visual impact or material change.
- 7.13 None of the limitations set out in Article 9 of the Regulations apply in this instance.
- 7.14 With regard to other sub articles, the proposal will not give rise to traffic hazard. As the trucks accessing the site are already on the public road and accessing overall facility, there will be no appreciable increase in traffic on the public road.
- 7.15 The site is not located within a designated scenic area or landscape and is not impacted by designated Natura 2000 sites or national monuments or other archaeological or architectural features or structures
- 7.16 The site is not located within a flood risk zone, nor have there been any recorded flooding events in the past at the site.

## 8.0 CONCLUSION

- 8.1 On the basis of the assessment set out herein, we respectfully request Cork City Council to share our view that the installation of said water tank at the Murphy Transport Depot at Maryfield, Ballinlough Road is development, which is exempted development having regard to Class 21 of Part 1 of Schedule 2 of the *Planning and Development Regulations, 2021, as amended*.
- 8.2 We look forward to your determination in due course,



# Site Location Map



**CENTRE COORDINATES:**  
ITM 569979,570832

**PUBLISHED:** 08/09/2022  
**ORDER NO.:** 50290187\_1

**MAP SERIES:** 6 Inch Raster  
**MAP SHEETS:** CK074

**COMPILED AND PUBLISHED BY:**  
Ordnance Survey Ireland,  
Phoenix Park,  
Dublin 8,  
Ireland.

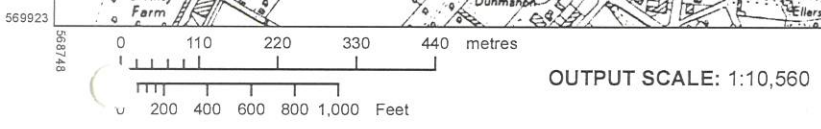
Unauthorised reproduction infringes Ordnance Survey Ireland and Government of Ireland copyright.

All rights reserved.  
No part of this publication may be copied, reproduced or transmitted in any form or by any means without the prior written permission of the copyright owners.

The representation on this map of a road, track or footpath is not evidence of the existence of a right of way.

Ordnance Survey maps never show legal property boundaries, nor do they show ownership of physical features.

© Suirbhéireacht Ordanáis Éireann, 2022  
© Ordnance Survey Ireland, 2022  
[www.osi.ie/copyright](http://www.osi.ie/copyright)



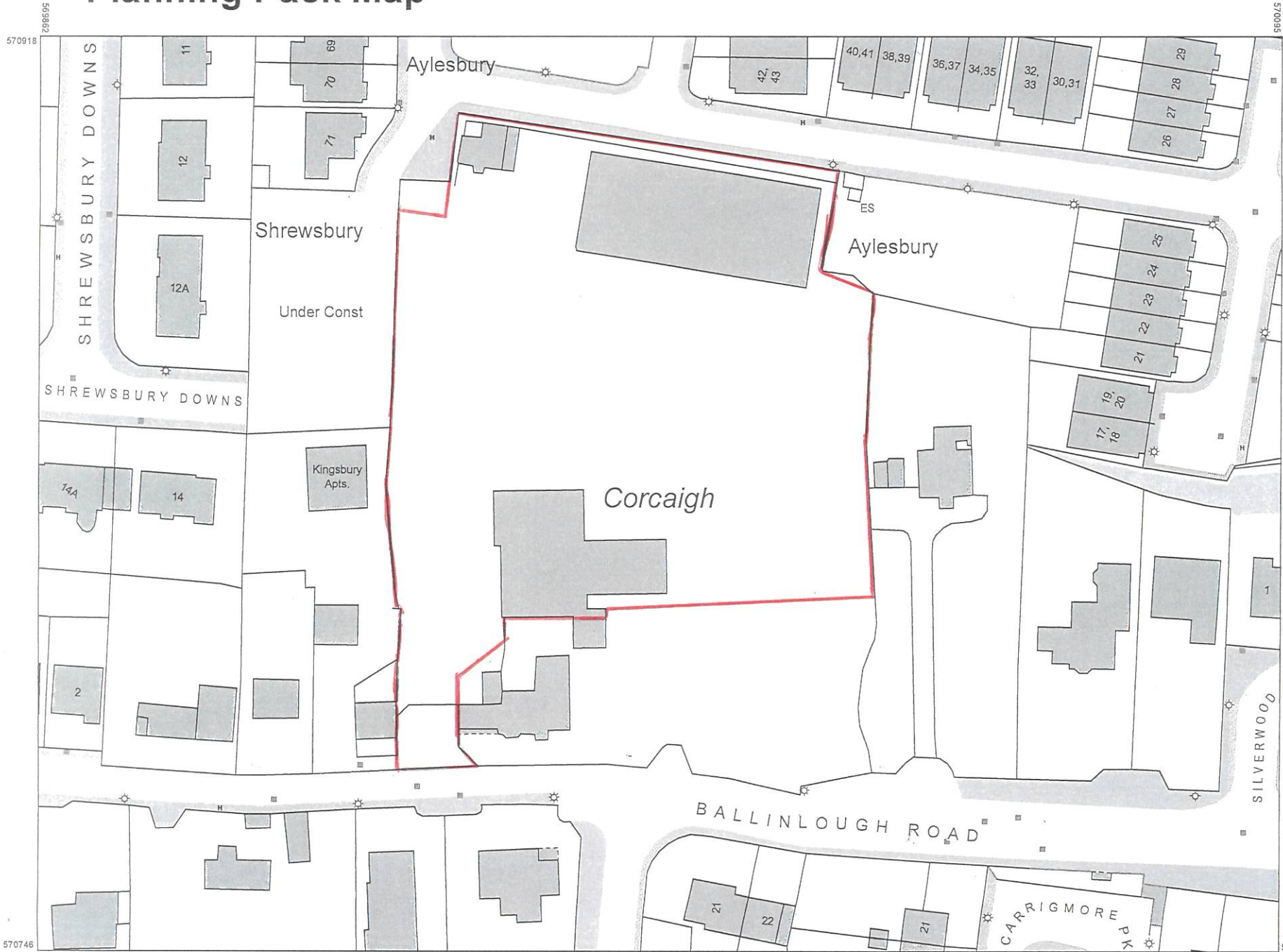
**CAPTURE RESOLUTION:**  
The map objects are only accurate to the resolution at which they were captured. Output scale is not indicative of data capture scale. Further information is available at: <http://www.osi.ie>; search 'Capture Resolution'



**LEGEND:**  
<http://www.osi.ie>;  
search 'Large Scale Legend'



# Planning Pack Map



CENTRE COORDINATES:  
ITM 569979,570832

PUBLISHED: 08/09/2022  
ORDER NO.: 50290187\_1

MAP SERIES: 1:1,000  
MAP SHEETS: 6383-18

COMPILED AND PUBLISHED BY:  
Ordnance Survey Ireland,  
Phoenix Park,  
Dublin 8,  
Ireland.

Unauthorised reproduction  
infringes Ordnance Survey Ireland  
and Government of Ireland  
copyright.

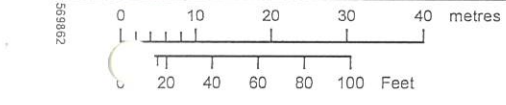
All rights reserved.  
No part of this publication may  
be copied, reproduced  
or transmitted in any form  
or by any means without the prior  
written permission of  
the copyright owners.

The representation on this map  
of a road, track or footpath  
is not evidence of the existence  
of a right of way.

Ordnance Survey maps  
never show legal property  
boundaries, nor do they  
show ownership of  
physical features.

© Suirbhéireacht Ordanáis Éireann,  
2022  
© Ordnance Survey Ireland, 2022  
[www.osi.ie/copyright](http://www.osi.ie/copyright)

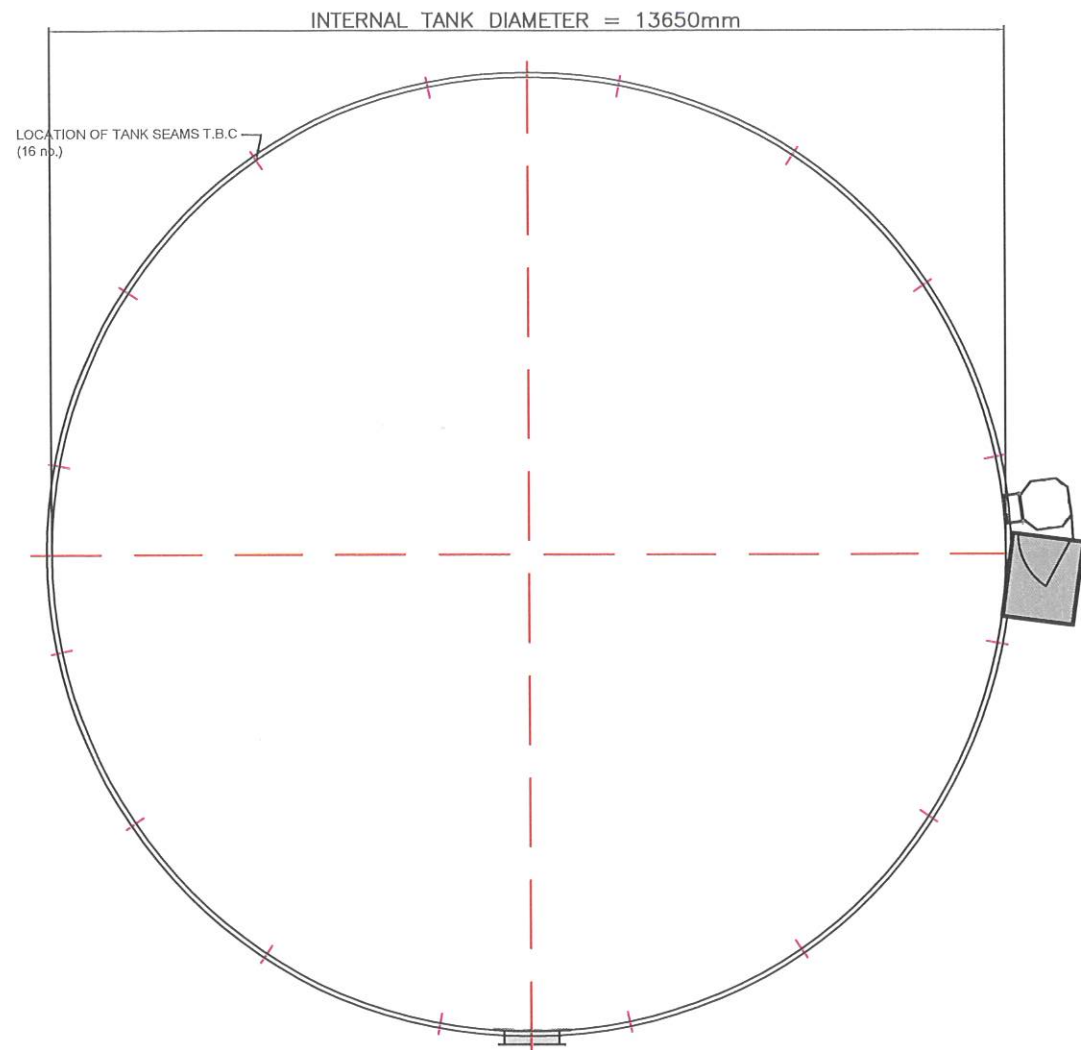
LEGEND:  
<http://www.osi.ie>;  
search 'Large Scale Legend'



OUTPUT SCALE: 1:1,000

CAPTURE RESOLUTION:  
The map objects are only accurate to the  
resolution at which they were captured.  
Output scale is not indicative of data capture scale.  
Further information is available at:  
<http://www.osi.ie>; search 'Capture Resolution'

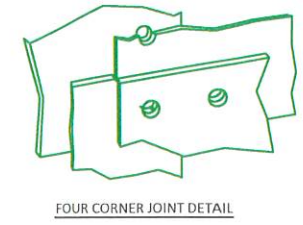




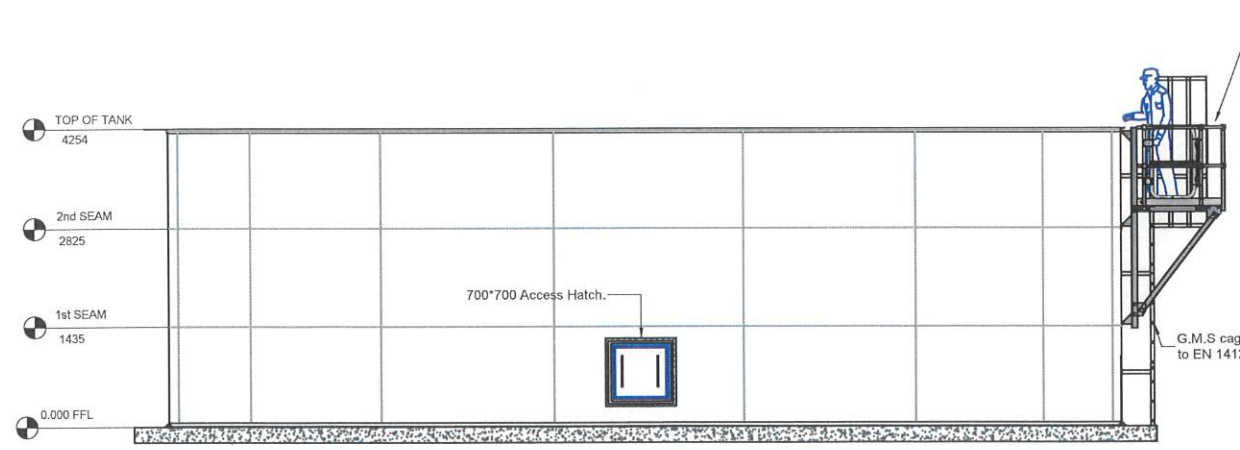
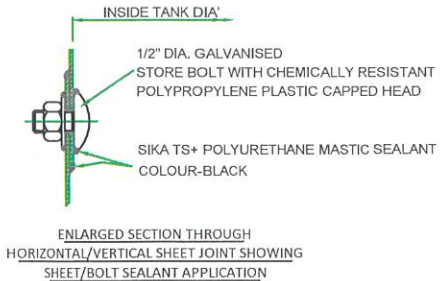
DETAIL 1. A



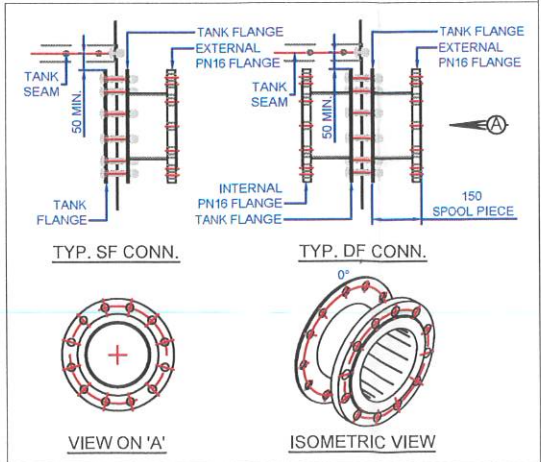
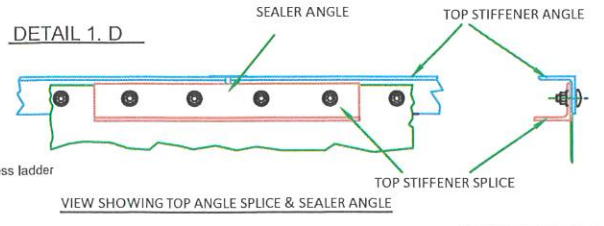
DETAIL 1. B



DETAIL 1. C



DETAIL 1. D



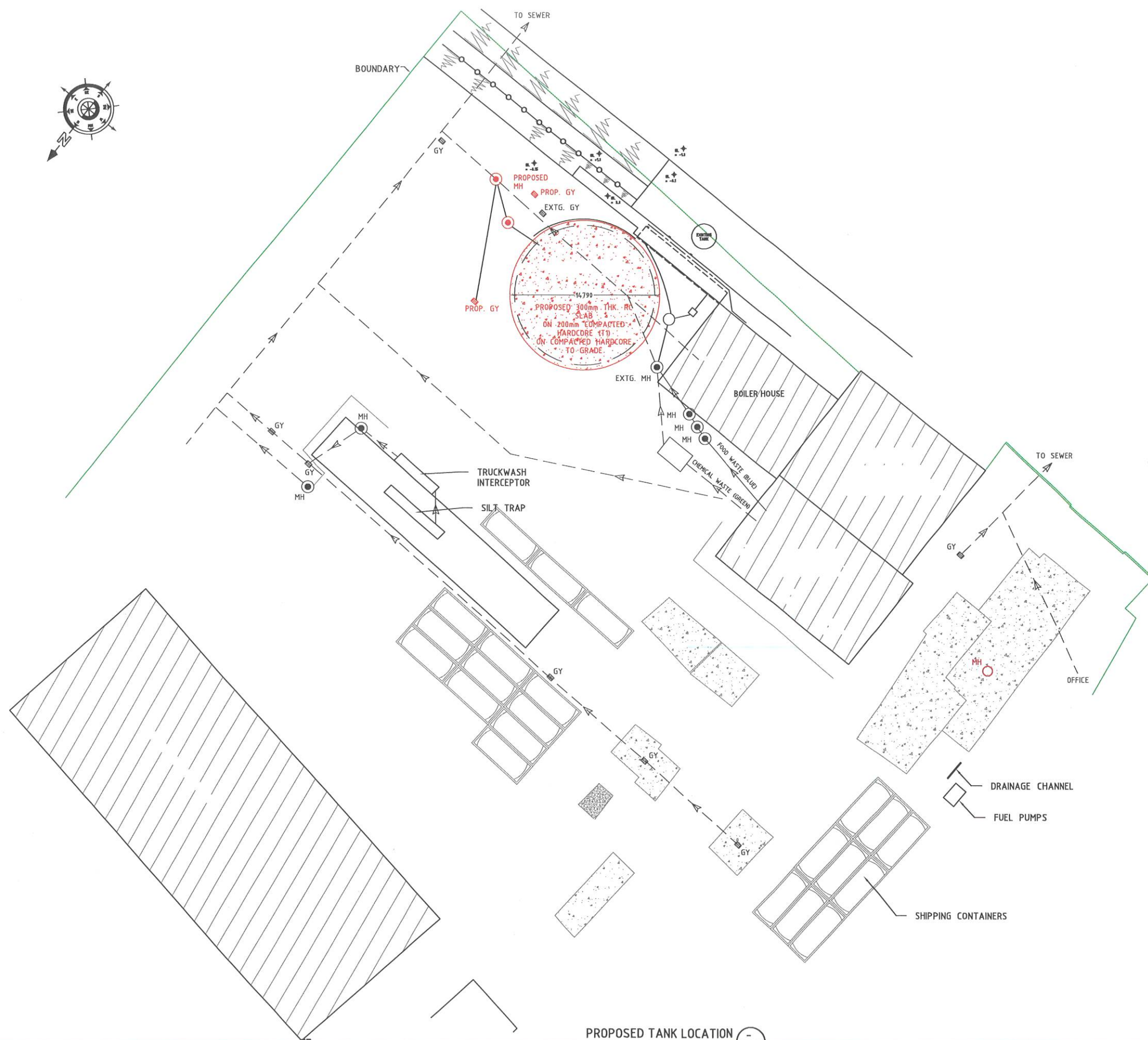
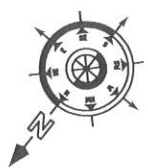
Option A



Notes

GENERAL NOTES:

- DO NOT SCALE DRAWING, USE FIGURED DIMENSIONS ONLY.
- THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL OTHER RELEVANT ARCHITECTURAL, MECHANICAL/ELECTRICAL AND ENGINEERING DRAWINGS & SPECIFICATIONS.
- STRUCTURAL CONCRETE TO BE AS PER SPECIFICATION OR SIMILAR APPROVED U.N.O.
- ALL REINFORCEMENT TO BE INSPECTED BY ENGINEER PRIOR TO POURING OF CONCRETE.
- FOR ALL SETTING OUT, REFER TO ARCHITECT'S DETAILS.
- THE CONTRACTOR IS RESPONSIBLE FOR ALL TEMPORARY WORKS REQUIRED IN ORDER TO CONSTRUCT THE BUILDING, WHILST MAINTAINING OVERALL STABILITY.
- BOTTOM OF TRENCHES TO BE CLEANED AND SIGNED OFF BY ENGINEER PRIOR TO THE POURING OF ANY CONCRETE.
- ALL WORKS CARRIED OUT MUST COMPLY WITH THE RELEVANT PARTS OF THE CURRENT BUILDING REGULATIONS AND TECHNICAL GUIDANCE DOCUMENTS, ENSURING THE WORKS ARE CARRIED OUT USING PROPER MATERIALS WHICH ARE FIT FOR USE FOR WHICH THEY ARE INTENDED AND FOR THE CONDITIONS IN WHICH THEY ARE USED.
- ALL MATERIALS USED SHALL BE 'CE' MARKED IN ACCORDANCE WITH THE EU CONSTRUCTION PRODUCT REGULATIONS (CPR) (No.305/2011). REFER TO ANNEX IV OF THE REGULATIONS FOR THE LIST OF APPLICABLE PRODUCTS.



PROPOSED TANK LOCATION  
SCALE 1:200

| Rev  | Date     | Drawn | Description                                     | Ch'kd |
|------|----------|-------|---|-------|
| INF6 | 23.06.22 | TL    | Revised Drainage, ESB Ducting & Silt Trap Added | BA    |
| INF5 | 29.03.21 | GR    | Tank Base Thickness Revised to 300mm            | BA    |
| INF4 | 23.10.20 | GR    | Tank Base Moved from South East Corner of Site  | BA    |
| INF3 | 21.10.20 | GR    | New Yard Gully Added                            | BA    |
| INF2 | 16.10.20 | GR    | Existing Drainage Added                         | BA    |
| INF1 | 03.09.20 | GR    | Re-Issued for Information                       | BA    |
| INF  | 06.20    | GR    | Issued for Information                          | BA    |


 2 Clogheen Business Park,  
 Blarney Road, Cork,  
 Ireland.  
 T: +353 (0)21 4399799  
 F: +353 (0)21 4399797  
 E: admin@rka.ie  
 W: www.rka.ie  
**CONSULTING ENGINEERS**  
 CIVIL | STRUCTURAL | PROJECT MANAGEMENT

**Client:**  
 Murphy Transport Ltd.  
 Ballinlough Road Depot,  
 Cork City.  
**Project:**  
 Proposed Tank Base

| Drawing Title:                     |                     |                 |  |
|------------------------------------|---------------------|-----------------|--|
| <b>Proposed Tank Base Location</b> |                     |                 |  |
| Designed: BA                       | Drawn: TL           | Date: June '22  |  |
| Eng Chk: BA                        | Dwg. Chk: BA        | Scale: As Shown |  |
| Project No: 600-584                |                     |                 |  |
| Drawing No: 01                     | Status: Information | Rev: INF6       |  |