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PLANNING STATEMENT

in support of application for

**ELECTRIC VEHICLE FAST-CHARGING HUB &
COFFEE DRIVE-THRU FACILITY**

at

**APPLEGREEN SERVICE STATION,
TOOTHENHILL, RATHCOOLE,
CO. DUBLIN**

Client: Petrogas Group Ltd

20th April 2022

1.0 Introduction

David Mulcahy Planning Consultants Ltd (agent) have been engaged by **Petrogas Group Ltd** to prepare a planning statement in support an application for construction of an **Electric Vehicle fast-charging hub and coffee drive-thru facility** on lands at Tootenhill, Rathcoole, Co. Dublin.

The purpose of this planning report is to describe the receiving environment, outline the planning context, including any relevant planning history, introduce the proposed development and to demonstrate how the proposal complies with the relevant planning guidelines, policies, objectives and standards that apply.

2.0 Location

The subject site is located to the west of Rathcoole village, in the Townland of Tootenhill, with significant frontage onto the N7.



Fig No.1 Site Location Map (source: Myplan.ie - OSI Licence No.EN 0080915).

2.1 Description

The subject site (0.27ha) forms part of a larger landholding owned by Petrogas Group Ltd which currently contains a service station building, fuel pumps and parking.

The subject site is currently vacant and remains the final portion of the applicant's overall landholding at this location to be developed. The site previously contained Tootenhill House but this was demolished following a grant of permission for same. The applicants have been actively looking for an appropriate use for this site as its current vacant nature detracts from the overall visual amenity of their existing premises.

There is a public footpath to the front with street lighting on the opposite side of the slip-lane.

There are residential dwellings located directly to the east side of the site. The rear gardens of these dwellings are screened from the site by a tall retaining wall. There are more dwellings to the south at a distance of approximately 55m.



Fig No.2 Aerial photograph of subject site (Google Earth Pro, January 2020).



Fig No.2 View of subject site from N7 (source: Google Street View July 2019).



Fig No.3 View of subject site from N7 (source: Google Street View July 2019).



Fig No.4 Photograph from west end of site facing east showing large retaining wall and fencing over along eastern boundary.

2.2 Adjoining lands.

East

Residential dwellings behind large retaining wall (Broadfield Grove).

West

The existing Applegreen filling station is open 24/7.

South

The car parking area associated with the Applegreen site is located to the south. There are residential dwellings backing onto the adjoining Applegreen site at a distance of approximately 55m.

North

There is a slip lane running along the north of the site which provides access to the main filling station.

3.0 Planning History

Subject Site

Reg. Ref. SD18A/0042

The applicant obtained conditional planning permission to **demolish 'Tootenhill House'**, a two storey, detached dwelling with a gross floor area of 269sq.m, including demolition of the front boundary. All associated site works. This permission has been implemented.

Wider Landholding

Reg. Ref. SD16A/0280

The applicant obtained conditional planning permission to replace filling station on a larger site including; (1) Demolition of 10 existing structures (554.7sq.m) including the existing filling station. (2) Construction of new shop building (gfa 612.7sq.m) containing 4 food offers (including take-away) retail area (net floor area of 100sq.m, including off-licence of 9.3sq.m), back of house area (286.6sq.m) and multiple signage on elevations. (3) Construction of 6

pump islands with branded canopy over. (4) 1 car wash facility. (5) All associated site works including dedicated HCV parking, car parking, landscaping, boundary treatment, footpaths, sheep ramp, retaining walls, main ID sign, road markings, interceptors, surfacing, attenuation, new entrance arrangements to adjoining property, upgrading of onsite foul pump station and widening, realigning and lengthening of existing culverting the Carrigeen Stream. This permission has been implemented.

The Planner's Report noted inter alia:

- The established filling station is a non-conforming use on RU zoned land (it was also noted that a restaurant/café is open for consideration under this zoning).
- There was no need for a Stage II Appropriate Screening Report.

ABP-302163-18

An Bord Pleanála ruled that the **electrical kiosk** was not exempted development.

Reg. Ref. SD20A/0012

Retention permission granted for a single storey **electrical kiosk** used to house electric panels for cabling and a **reconfigured car parking layout** (from that permitted under Reg. Ref. SD16A/0280) confined to the area at the front of the service station building and west of the fuel pumps (including reconfigured disabled spaces); Permission granted to relocate an existing disabled parking space at the front of the service building to the row of parking to the west; all associated site works on lands at Applegreen, Naas Road Service Station.

All the above permissions have been implemented.

2.5 Planning Context

South Dublin County Development Plan 2016 - 22

The subject site is **zoned 'RU'**:- : *'To protect and improve rural amenity and to provide for the development of agriculture'*

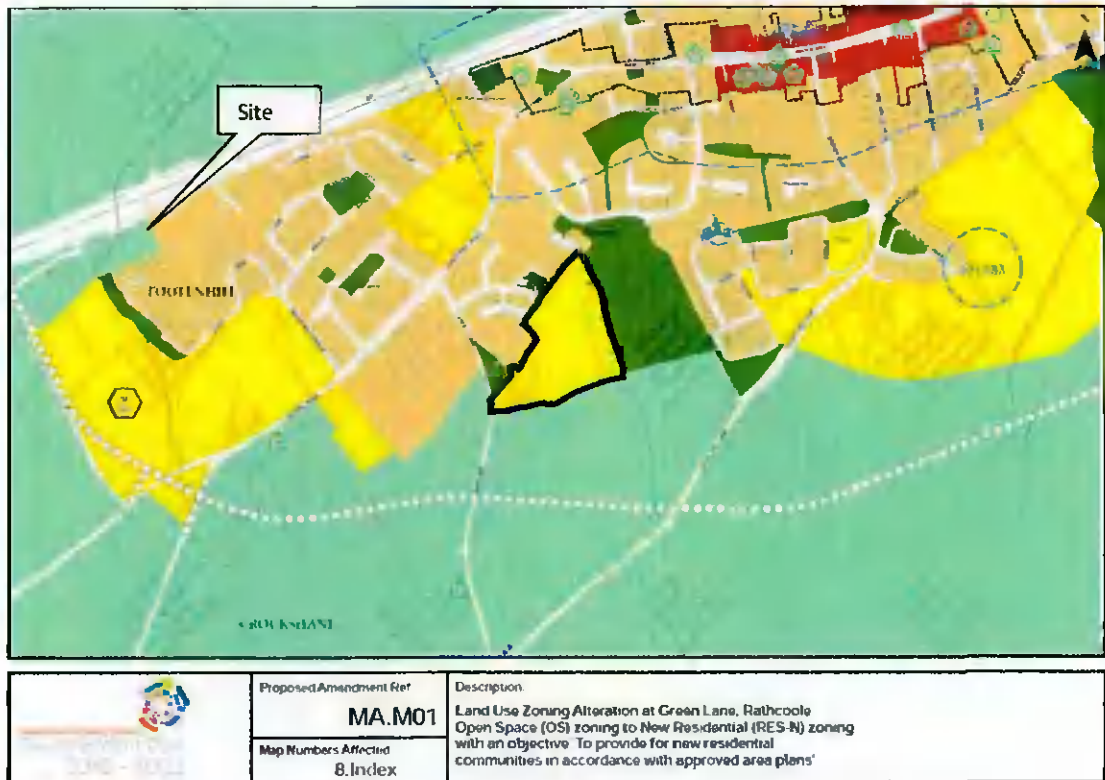


Fig No.5 Extract from South Dublin CDP 2016-22 zoning map.

Policy 11.3.6 Fast Food/Take-Away

We submit to the Council that this policy does not apply in respect of the proposed development. The proposed drive-thru coffee facility does not involve any frying of food. This is a café primarily serving beverages, with some ancillary foods typical of cafes such as buns, biscuits, bars and sandwiches.

Draft South Dublin County Development Plan 2022-28

The zoning objective for the site remains the same - RU - despite the fact that there is an established filling station on the wider landholding.

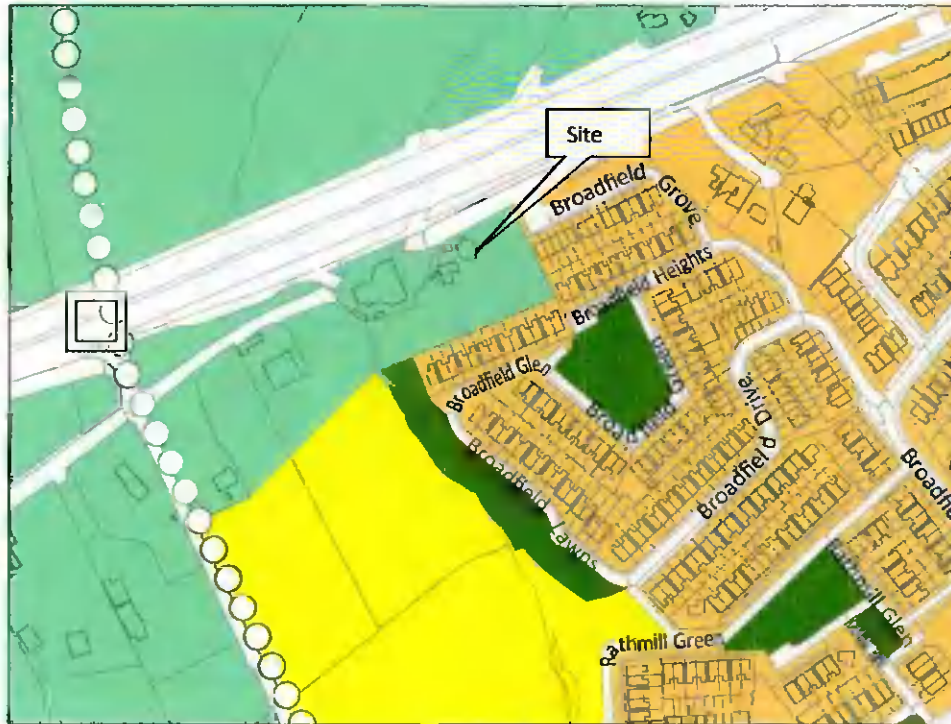


Fig No.6 Extract from Map No.7 draft South Dublin CDP 2022-28.

2.6 Proposed Development

The applicant seeks permission to provide an **Electric Vehicle fast-charging hub** and complimentary standalone **drive-thru coffee facility** on the subject site. There is also a small substation proposed.

2.6.1 Pre-Planning Meeting

An on-line pre-planning meeting was held with the Council on 24.11.20. It was attended by **Tracy McGibbon** and **Anne Hyland** from the Planning Authority, Darby Mullen (engineer) and John Hegarty and William Purcell (roads engineers) from the Council. The issues raised in this meeting have been addressed as part of the formal application. A response to each item raised is provided in s.2.7 below.

2.6.2 Description

The development consists of an electric fast-charging hub and a drive-thru coffee building (24/7 opening hours).

The 8 no. electric fast charging spaces are proposed to the west side of the site.

The proposed drive-thru coffee building (gfa 167sq.m) will contain a beverage area, seating area and back of house area (storage, lobby and toilets). The building is single storey in nature with a maximum ridge height of 6m and a minimum ridge height of 3.6m. It is proposed to include 3 no. signs on the building.

Also, ancillary development consisting of refuse compound, 4 no. free-standing signs, 1 no. free-standing height restrictor, 1 no. sub-station (gfa 28.75sq.m, 3.075m high), car parking (31 no. car park spaces), internal vehicular access, internal circulation road, paving, pedestrian entrance with steps, landscaping, boundary treatment, and all associated site works including pumping station.

13 no. existing car park spaces will be removed to facilitate the proposed development.

Please refer to the computer graphic images of the proposed development taken from the N7 which demonstrate how it will appear from same.

2.6.3 Consistency with Planning Guidelines, Policy, Objectives and Standards

Fast charging EV fast-charging hub

The National Planning Framework (NPF) 2040 sets out ten national strategic desired outcomes for future developments. The fourth outcome 'sustainable mobility' seeks in accordance with Ireland's Climate Change mitigation plan to progressively electrify our mobility systems moving away from polluting and carbon intensive propulsion systems to new technologies such as electric

vehicles and the introduction of electric and hybrid traction systems for public transport fleets, such that by 2040 our cities and towns will enjoy a cleaner, quieter environment free of combustion engine driven transport systems.

We also note that National Policy Objective 55 in the NFP seeks to "*promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050*". The CO₂ emissions of a car are directly proportional to the quantity of fuel consumed by an engine. While there has been progress in reducing emissions of air quality pollutants from vehicles, there has been less progress in reducing CO₂ from cars despite improvements in engine efficiency. This is where electric vehicles come in as crucial to help reduce CO₂ emissions.

Electric vehicles do not produce any exhaust emissions during their operation and as such, the Climate Action Plan 2019 seeks to accelerate the take up of EV cars so that 100% of all new cars and vans are EV's by 2030. This will enable achieving Ireland's target of 950,000 EV's on the road by 2030. In order to achieve this goal, it will be critical that there are appropriately located fast-charging hubs on the national road network to facilitate an increase in electric cars, something which is notably lacking at present.

With regard to the EV charging network, to give people the confidence to switch to EV's, and ensure that the national charging network has a substantial supply buffer ahead of demand, measures include:

- Continue supporting the expansion of the EV charging network as well as the refuelling network for alternatively fuelled vehicles to address freight emission.
- Deliver charging infrastructure under the Climate Action Fund, to include over 90 high powered chargers at key locations on the national road network, installation of 50 new fast chargers, and replacement of over 250 standard chargers.
- Require new non-residential buildings with more than 10 parking spaces to have at

- least one recharging point installed by 1st January 2025.
- Require the installation of a minimum number of recharging points for all existing nonresidential buildings with more than 20 parking spaces by 1st January 2025 at the latest and review the level of provision to ensure it is ahead of demand.
- Work with the motor sector and retailers to rapidly expand the charging network on garage forecourts.
- Frontload public investment to drive consumer confidence in the availability and
- reliability of public charging infrastructure and set a strategy for EV charging stations with a defined target to stay ahead of demand, couple with clear planning rules that facilitate installation and increase the obligation over time.

The National Mitigation Plan 2017 is Ireland's first statutory national mitigation plan. The plan sets out a pathway to achieve the level of decarbonisation required. The Plan not only contains measures to address the challenges to 2020 but begins the process of developing medium to long term options to ensure that we are all well positioned to take the necessary actions in the next and future decades. The plan confirms the Government's commitment to reducing emissions and building a climate resilient low carbon transport sector by 2050. It notes the successful measures that are already in place to reduce transport sector emissions including incentives to encourage the purchase of electric vehicles and redesigning the Vehicle Registration Tax and motor tax regimes to promote low carbon emitting vehicles.

It is clear that there needs to be a far greater provision of EV Charging locations, and this proposed facility on the busy N7 route at Rathcoole is badly needed.

South Dublin County Development Plan 2016-22: Transport and Mobility (TM)
Policy 7 Car Parking, TM7 Objective 4:

To make provisions for the use of electric vehicles through a significant increase in the provision of clearly and exclusively designated electric car charging points on public and private land in partnership with ESB and other relevant stakeholders and land owners.

11.4.3 Car parking for electric vehicles

The Electric Transport Programme (2008) contains a target for 10% of the national road transport fleet to be electrically powered by 2020. To facilitate the use of electrically operated cars and bicycles in line with National Policy, all developments shall provide facilities for the charging of battery operated cars at a rate of up to 10% of the total car parking spaces. The remainder of the parking spaces should be constructed to be capable of accommodating future charging points, as required.

The Planning Authority will also consult with ESB Networks to continue the roll-out of Rapid Charge points throughout the County. Particular emphasis will be placed on the provision of such spaces within centres of commercial activity, as outlined by Movement Framework Plans, Area Access Plans and other strategic planning documents.



Fig No.5 Typical example of Applegreen EV Chargers located in Birdhill, Co Tipperary

There are also 8 no. tesla bays in Birdhill, Co. Tipperary - see photographs below.



Fig No.8 Tesla EV Chargers located in Birdhill, Co Tipperary



Fig No.9 Tesla EV Chargers located in Birdhill, Co Tipperary

Drive-thru coffee facility

The concept behind the standalone drive-thru coffee facility is that drivers who do not want fuel and don't want to spend time queuing in the primary building, can obtain a quick coffee in their car and continue on their journey, or, can stop for a rest and have a quick coffee.

The N7 forms part of the Trans-European Transport Networks (TEN-T). The TEN-T regulation defines the objective of increasing the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport. The regulation defines a need for drivers to appropriate breaks when driving in order to avoid accidents. The Road Safety Authority estimate that driver fatigue is a contributory factor in as many as 1 in 5 driver deaths in Ireland

every year. They specifically recommend that to take a caffeine drink before a quick nap (150mg of caffeine e.g. 2 cups of coffee).

The purpose of the coffee shop is to provide an alternative to the main food court for customers. At busy times it also enables additional capacity in the food and beverage offer at the site. It is a typical design of a building used for this purpose. The proposed entrance to the drive-thru is contained within the confines of the existing site. The drive-thru lane and approach from the existing site entrance has sufficient capacity to accommodate the anticipated number of cars queuing and allow for ordering and preparation of hot drinks.

The facility will be owned and operated by the applicant who have considerable experience in delivery of high-quality service and management. Applegreen operates circa 30 standalone drive thru facilities across its wider network, the vast majority as an integral part of a motorway service area.

It is estimated that the proposed development will employ approximately 20 people (full and part time).

The standalone coffee drive-thru concept is an increasingly common facility in Britain and is often associated with petrol stations. Petrogas Group Ltd have established drive-thru coffee facilities at Ester Forest & Corley North in the UK.



Fig No.10 Typical of standalone drive-thru coffee facility in Corley, UK.

In 2018 Maxol opened an Insomnia Coffee Drive-Thru in Ballycoolin which they claim was the first of its type in Ireland. In this instance the café forms part of the main service station building, with the drive-thru serving coffee (rather than a standalone building).

Starbucks opened a standalone drive-thru café in The Shannon Free Zone industrial estate, Limerick in 2018, and also at the Marshes Shopping Centre in Dundalk in January 2020. This is a standalone model similar to that being proposed in this instance, although it is not associated with a filling station.



Fig No.11 Image of Starbucks standalone, drive-thru coffee facility in Limerick.

The facility will be owned and operated by Petrogas Group Ltd (T/A Applegreen) who have considerable experience in delivery of high-quality service and management. Applegreen operates circa 30 stand-alone drive-thru facilities across its wider network, the vast majority as an integral part of a motorway service area.

It is estimated that the proposed development will employ approximately 20 people.

We stress to the Council that there are very limited land uses which are appropriate for the subject site in order to address its vacant status. The proposed use is ancillary to the main land use on the site and is therefore considered to be appropriate.

2.7 Pre-Planning Meeting Issues

The following issues were raised in the pre-planning meeting with the applicant advised to address each as part of the planning application.

2.7.1 Zoning Objective

The subject site is zoned 'B' under the South Dublin County Development Plan 2016 - 22, the objective of which is to *'To protect rural amenity/provide for development of agriculture'*.

Table 11.1.1 deals with LAND USE ZONING TABLES.

The use classes relating to Objective RU are outlined below.

USE CLASSES RELATED TO ZONING OBJECTIVE	
Permitted in Principle	Aerodrome/Airfield, Agriculture, Allotments, Cemetery, Concrete/Asphalt Plant in or adjacent to a Quarry, Home Based Economic Activities ^a , Industry-Extractive, Open Space, Public Services, Rural Industry-Food.
Open for Consideration	Abattoir, Bed & Breakfast ^a , Boarding Kennels, Camp Site ^h , Car Park ^h , Childcare Facilities ^b , Community Centre, Crematorium, Cultural Use ^a , Doctor/Dentist ^b , Education, Embassy ^a , Enterprise Centre ^b , Fuel Depot ^b , Funeral Home ^b , Garden Centre, Guest House ^a , Health Centre ^b , Heavy Vehicle Park, Hotel/Hostel, Offices less than 100 sq.m, Petrol Station ^b , Place of Worship ^b , Primary Health Care Centre ^a , Public House ^b , Recreational-Facility, Recycling Facility ^b , Refuse Landfill/Tip, Residential ^c , Restaurant/Café, Service Garage ^b , Shop-Local ^b , Social Club, Sports Club/Facility, Stadium, Traveller Accommodation, Veterinary Surgery.
Not Permitted	Advertisements and Advertising Structures, Betting Office, Caravan Park-Residential, Conference Centre, Hospital, Housing for Older People, Industry-General, Industry-Light, Industry-Special, Live-Work Units, Motor Sales Outlet, Nightclub, Nursing Home, Office-Based Industry, Offices 100sq.m-1,000 sq.m, Offices over 1,000 sq.m, Off-Licence, Outdoor Entertainment Park, Refuse Transfer Station, Residential Institution, Retail Warehouse, Retirement Home, Science and Technology Based Enterprise, Scrap Yard, Shop-Major Sales Outlet, Shop-Neighbourhood, Transport Depot, Warehousing, Wholesale Outlet, Wind Farm.

- a In existing premises
- b In Villages to serve local needs
- c In accordance with Council policy for residential development in rural areas
- f In accordance with a Local Area Plan
- h For small-scale amenity or recreational purposes only

There is no specific reference to 'fast-charge electrical vehicle hub' or 'drive-thru coffee facility', both of which are very contemporary land uses.

Subsection (v) deals with 'Other Uses'. It states that "Uses that have not been listed under the land use zoning tables will be considered on a case-by-case basis in relation to conformity with the relevant policies, objectives and standards contained within the Plan, particularly in relation to the zoning objective of the subject site and its impact on the development of the County at a strategic and local level".

We submit that the Council can assess the proposed development on this basis.

Alternatively, it is noted that both 'Car Park' and 'Restaurant/Café' and 'Petrol Station' are Open for Consideration uses. There is a caveat associated with 'Car Park' that it must be associated with small-scale amenity or recreational purposes. There is a caveat associated with the 'Petrol Station' use that they must be in villages to serve local needs.

Electrical fast-charge hub

It is submitted that the car parking associated with the electrical fast-charge hub is associated with both the existing petrol station and the proposed drive-thru coffee facility. On that basis it is reasonable to consider this facility as an ancillary element of the established Petrol Station on the site. We further note that electric fast-charge hubs are becoming fundamental elements of 'Petrol Stations' and the description of filling stations as 'Petrol' stations is becoming dated.

Drive-Thru Coffee Facility

It is further submitted that the drive-thru coffee facility can be considered as a 'café' which is an open for consideration land use. It is further submitted that the drive-thru café facility is also an ancillary element of the established Petrol Station on this site. They are complementary land uses providing rest opportunities for drivers as part of the one overall complex and the need for the drive-thru coffee facility is derived from the requirement to reduce queue times in the main petrol station. This drive-thru facility would not be proposed at this location in the absence of a petrol station

2.7.2 Traffic

The Council sought the following reports and analysis as part of the application:

- Traffic Assessment (potential intensification of traffic movements)
- Parking Strategy
- Autotrack analysis
- Construction Traffic Plan
- Mobility Management Plan

Each of these reports/analyses has been prepared by ATKINS Consulting Engineers.

A Road Safety Audit was also required and this has been prepared by Mr. Martin Deegan of Traffico Ltd.

For clarity the proposed car parking (excluding the 8 no e-charge spaces) consists of:

- 2 no. disabled spaces to front of building
- 3 no. at e-charge area and 6 no. at high level to south = 9no. total 'outside of drive thru facility'
- 3 no at front of building, 9 no. at side of site and 8 no. at south of side = 20 no. all 'inside of drive thru facility'

Total 31 spaces.

2.7.3 Services Infrastructure

Please refer to the **Engineering Services Report** and **drawings** prepared by JA Gorman Consulting Engineers. JA Gorman Engineers supervised the building of the main filling station development on the site and thus have an intimate knowledge of the site. The report deals with foul, surface water, water supply and flood risk.

2.7.4 Preliminary Construction Management Plan

A Preliminary Construction Management Plan has been prepared by JA Gorman Consulting Engineers as requested.

2.7.5 Landscape

The applicant was requested to provide a landscape design as part of the application and to address green infrastructure. Please refer to the **landscape plan** prepared by Gannon & Associates, Landscape Architects.

It is highlighted that the applicants are experienced operators of filling stations around the country and place a significant weight on their external appearance. The implementation of any landscape plan associated with a planning permission is a priority in this regard.

2.7.6 Noise Impact

The potential noise impact on the established residential amenity of the dwelling owners to the east and south of the site was raised. The photograph below shows the relationship of the dwelling to the east side of the site relative to the site.

Please refer to the **Noise Report** prepared by Mr. Noel Tynan of Decibel Noise Control. This report concludes that one cannot undertake construction work without making noise and it is likely that some short-term site work may increase the ambient noise level at various noise sensitive locations. However, to limit this impact such work should be carried out in a responsible manner and appropriate noise control measures are outlined in the report. The applicant welcomes a condition of planning permission for these mitigation measure to be implemented during the construction phase. The report further notes that considering the small 17% increase in traffic to the site, along with the fact that charging Electric Vehicles (EV's) is a relatively quiet exercise and that all mechanical services associated with the proposed development will comply with the Environmental Protection Agency (EPA) noise criteria. It is concluded that the development, during both the construction and operational phases will not give rise to justified noise complaint at any noise sensitive location. It is a recommendation of this report that a noise survey be conducted when the proposed development is complete so as to demonstrate compliance with the recommended noise criteria.

2.7.7 Visual Impact

Although this issue was not specifically raised in the pre-planning meeting it was nonetheless considered important to include CGI images of the proposed development to demonstrate to the Planning Authority how it will appear from the N7.

It should be noted that views of the proposed drive-thru coffee facility on the outbound carriageway will be largely obscured by existing fencing, walls and hedges. It is only when cars are very close to the facility that that the building

will be seen. The free-standing sign is important in this context to alert drivers to the service, particularly in the early days until it becomes more widely known about.



Fig No.12 Existing boundary treatment and planting which will largely obscure views of the proposed drive-thru coffee facility on the outbound carriageway.

View No1

This view shows the proposed development as viewed from the junction of the N7 and the entrance into the filling station. It is submitted that due to a combination of the higher ground level outside the site, the proposed boundary treatment, the high wall back-drop and the proposed tree planting that the proposed development is not conspicuous or incongruous and fits in comfortably on the wider commercial site. The signage on the building is also not overly conspicuous and does not have a significant impact on the visual amenity of this established commercial area.



Fig No.13 CGI image of the proposed development taken from the entrance to the existing filling station showing the development upon completion.

View No.2

This view shows the proposed development from the grass verge on the west side of the slip lane on the N7. It is submitted that owing to the lower ground level of the site, the modest size and scale of the building, the attractive design of the building and the backdrop of existing housing and the filling station, the visual impact is not a negative one. The buildings sits comfortably in its surrounds and does not detract from the visual amenity of the area.

Note: the proposed landscaping is not shown in this image.



Fig No.13a CGI image taken from the grass verge on the west side of the slip lane showing a view of the proposed development upon completion.

2.7.8 Lighting

Please refer to the **lighting plan and report** prepared by Domus Lighting.

2.8 Appropriate Assessment Screening

Screening is the first stage within the overall process of 'Appropriate Assessment' (AA) or 'Habitats Directive Assessment', required by the Habitats Directive (Article 6 (3) s.1.2). Circular NPW 1/10 and PSSP 2/10, dated 11th March 2010, issued by the Department of the Environment, Heritage and Local Government states that any project must be assessed for impact upon Natura 2000 sites, in accordance with Article 6 (3) of the European Habitats Directive. The Circular further notes that while "*all projects involving land use change are subject to screening, in the majority of cases this will not necessitate the consent authority having to seek additional information*" - emphasis added.

The purpose of the screening is to assess, in view of best scientific knowledge, if the proposed development, individually or in combination with another plan or project is likely to have a significant effect on a site of European-level ecological importance (i.e. Natura 2000 sites: candidate Special Areas of Conservation and Special Protection Areas).

Screening is defined in the Appropriate Assessment for Plans and Projects in Ireland: Guidance for Planning Authorities, 2009 ('AA Guidelines, 2009') as:

"the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3):

- i) whether a plan or project is directly connected to or necessary for the management of the site, and*
- ii) whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a Natura 2000 site in view of its conservation objectives.*

If the effects are deemed to be significant, potentially significant, or uncertain, or if the screening process becomes overly complicated, then the process must proceed to Stage 2 (AA). Screening should be undertaken without the inclusion of mitigation, unless potential impacts clearly can be avoided through the modification or redesign of the plan or project" (emphasis added).

If no likely significant effects have been identified then the assessment process does not proceed any further.

In this context "likely" means any effect that may be reasonably predicted and "significant" means not trivial or inconsequential but an effect that is potentially relevant to the site's conservation objectives (English Nature, 1999). Any effect which would compromise the functioning and viability of a site and interfere with achieving the conservation objectives of the site would constitute a significant effect.

The closest Natura 2000 site is c.**7.9 kilometres** away – **Site Name: Glenasmole Valley SAC Site Code: 001209.**

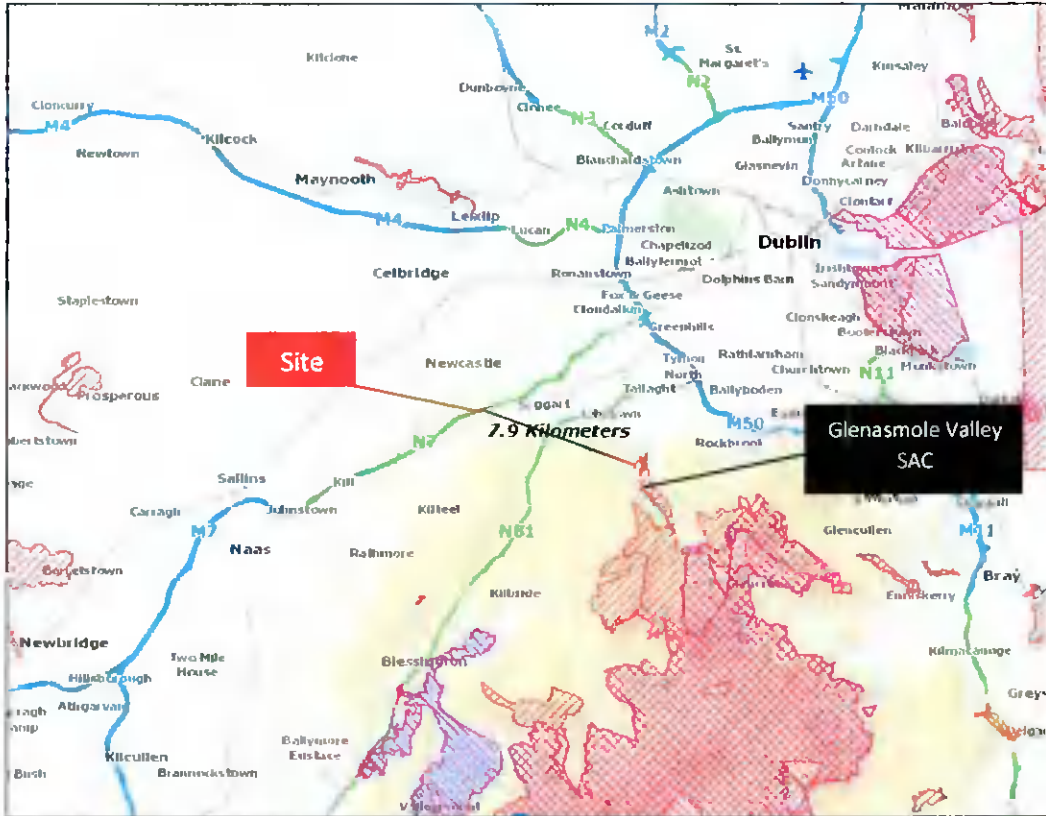


Fig No.14 Location of site relative to Natura 2000 sites (source: Myplan.ie - OSI Licence No.EN 0080915).

There is a small stream running under the site (culverted). It passes under the N7 and appears to connect with the Griffeen River at Blundelstown – a distance of 4.2km from the site. There is no possibility of pollution of this stream from the proposed development give it is culverted.



Fig No.14a Distance of site from connection with river at Blundelstown (4.2k)

The Griffen River eventually connects with the River Liffey in Lucan – a distance of approx. 12km from the site.



Fig No.15 Distance of site from River Liffey via Griffen Stream and River

It is important to note that the Rye River/Carton Valley SAC is upstream of this point so there is no potential impact on this Natura 2000 site.

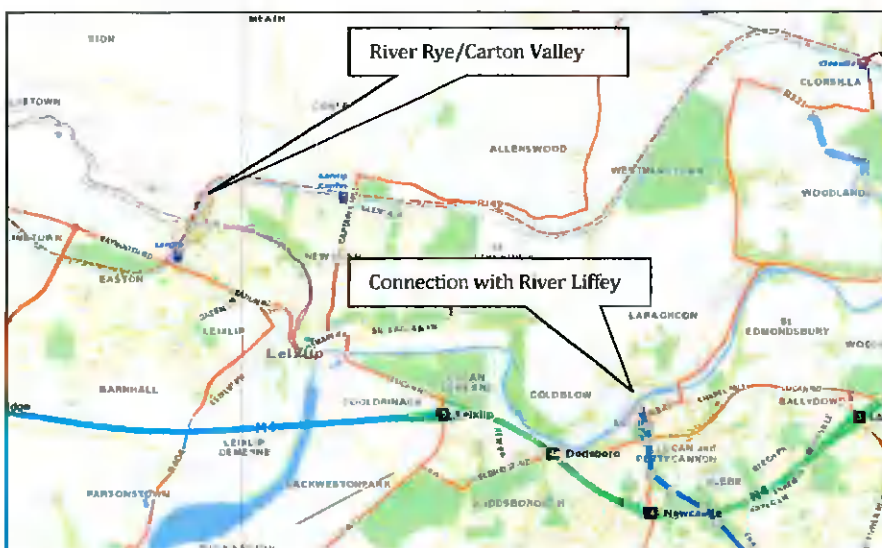


Fig No.16 Location of River Rye/Carton Vally SAC relative to outfall of Carigeen River into River Liffey (downstream)

The River Liffey eventually connects with Dublin Bay where there are a number of Natura 2000 habitats.

Taking into consideration the small scale of the development, the connection to public mains, the lack of any ecological link to any Natura 2000 site (as there is only a culvert running under the site), the significant distance to any Natura 2000 site, it is submitted that there is no need for a Stage II AA.

2.8 Conclusion

The applicant seeks permission to construct an Electric Vehicle ('EV') fast-charging hub and standalone drive-thru coffee facility adjacent to their existing filling station in Tootenhill, Rathcoole, Co. Dublin.

The existing vacant site is the last remaining part of the applicant's site to be developed. There are very limited options for development on the site given the restricted access to same. An ancillary use associated with the existing filling station development is considered to be the only viable use for this site.

The proposed land uses are both very contemporary and do not neatly fit with listed land uses under the land use zoning matrix. However, we submit that they can be assessed on their merits or, having regard to similar land uses which are included in the matrix. Both uses are complementary to the established filling station on the site and will serve drivers using the N7 enhancing the vital rest services that already exist.

The proposed electric fast charging hub fully complies with national, regional and development plan policy. There are no specific policies in relation to drive-thru coffee facilities but, taken in the context of an important additional to an established on-line filling station serving the busiest road in the country, it is submitted that there is a practical and logical need for the proposed development which accords with proper planning and development of the area.

The building is modest in terms of size and scale and views of same will be largely obscured on the outbound carriageway. It has been designed to a high quality in terms of built form and external finishes.

We submit that the proposed development will:

- make appropriate use of a vacant site that detracts from the visual amenity of the area
- provide an important service to motorists who are looking for a rest or to be revived on their journey as they continue to travel
- provide fast-charging EV facilities for motorists in line with government policy to promote sustainable travel.
- create local employment opportunities
- not result in any material impact on the established residential amenity of adjoining property owners.

It is considered that the proposed development will not have a material impact on the residential amenity of dwellings owners to the east or south.

It is not considered that a Stage II Appropriate Assessment is required and we invite the Council as the competent body in this regard to agree.

Yours sincerely,



David Mulcahy
David Mulcahy Planning Consultants Ltd
CHARTERED PLANNING CONSULTANTS