

DM	DAVID MULCAHY PLANNING CONSULTANTS LTD
	67 The Old Mill Race, Athgarvan, Co. Kildare
	PH: 045 405030/086 350 44 71 E-mail: david@planningconsultant.ie www.planningconsultant.ie
Company No. 493133 Directors: D. Mulcahy & M. Mulcahy	

Planning Department
South Dublin County Council
County Hall
Tallaght,
Dublin 24, D24 A3XC

13th December 2022

Re: CLARIFICATION OF FURTHER INFORMATION RESPONSE

**Planning application for Electric fast charging hub and drive-thru coffee building (24/7 opening hours). 8 electric fast charging spaces to the west side of the site; drive-thru coffee building (167sqm) will contain a beverage area, seating area and back of house area (storage, lobby, toilets); single storey building with a maximum ridge height of 6m and a minimum ridge height of 3.6m; 3 signs on the building; ancillary development of refuse compound, 4 free standing signs, 1 free standing height restrictor, 1 substation(28.75sqm 3.075m high), 31 car parking spaces, internal vehicular access, internal circulation road, paving, pedestrian entrance with steps, landscaping, boundary treatment and all associated site works including pumping station. 13 existing car park spaces will be removed to facilitate the proposed at Applegreen, Naas Road Service Station, Tootenhill, Rathcoole, Dublin, D24DH00
Reg. Ref. SD22A/0114**

Dear Sir/Madam,

We act on behalf of **Petrogas Group Ltd.** in responding to the further information request issued by the Council on 14-Nov-2022. This response meets the six-month deadline – 13th December 2022.

6 copies of this response are provided to the Council as requested.

Item No.1 Car parking to serve the coffee shop

*1. From the plans submitted, it appears that the applicant is proposing to provide 22 no. car parking spaces to serve the coffee shop. This is significantly in excess of the maximum standard permissible in the Development Plan. The applicant is requested to submit a **revised car parking layout removing excess parking spaces**, indicated above the maximum permissible rates per Table 12.25 of the Development Plan 2022 – 2028. **The 9 no. car parking spaces along the eastern boundary shall be removed and replaced by enhanced landscaping and SuDS proposals. In addition, the 1no. car parking space to the left of the mobility bays serving the coffee shop, and in front of the refuse area, shall also be removed.** In providing a revised landscaping and SuDS strategy, the applicant should also have regard to the sites location within a Riparian Corridor, referenced in Chapter 4 and Section 12.4.3 of the Development Plan 2022 - 2028.*

Table 12.25 of the Development Plan 2022 – 2028 set out Maximum Parking Rates (Non-Residential). Under Zone 1 the maximum parking rate for a Café/Restaurant is 1 car park space per 15 sq m GFA. The GFA of the proposed drive-thru coffee facility is 167sq.m. On that basis the maximum car parking rate is $167/15 = 11.13$ (11 spaces).

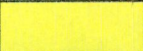




Please refer to the **revised site layout drawing** prepared by JA Gorman Consulting Engineers and the **car parking schedule** below.

The row of car park spaces along the eastern boundary have been omitted as requested. The 1no. car parking space to the left of the mobility bays serving the coffee shop, and in front of the refuse area, has also been removed

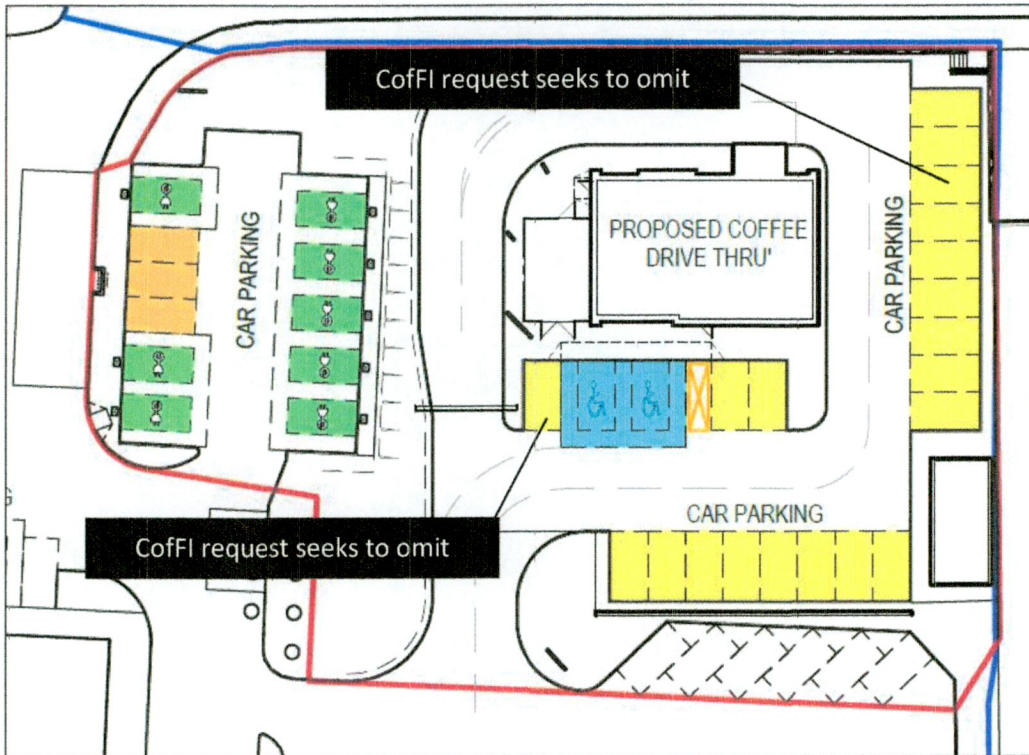
A total of 11 car park spaces are provided for the drive-thru coffee facility – 9 no. general spaces and 2 no. disabled spaces.

1 no. separate EV charging space is provided. We note that EV charging spaces are to be included in the car parking provision under the Development Plan. It is submitted that this should not be calculated in the 'normal' car parking calculation in this

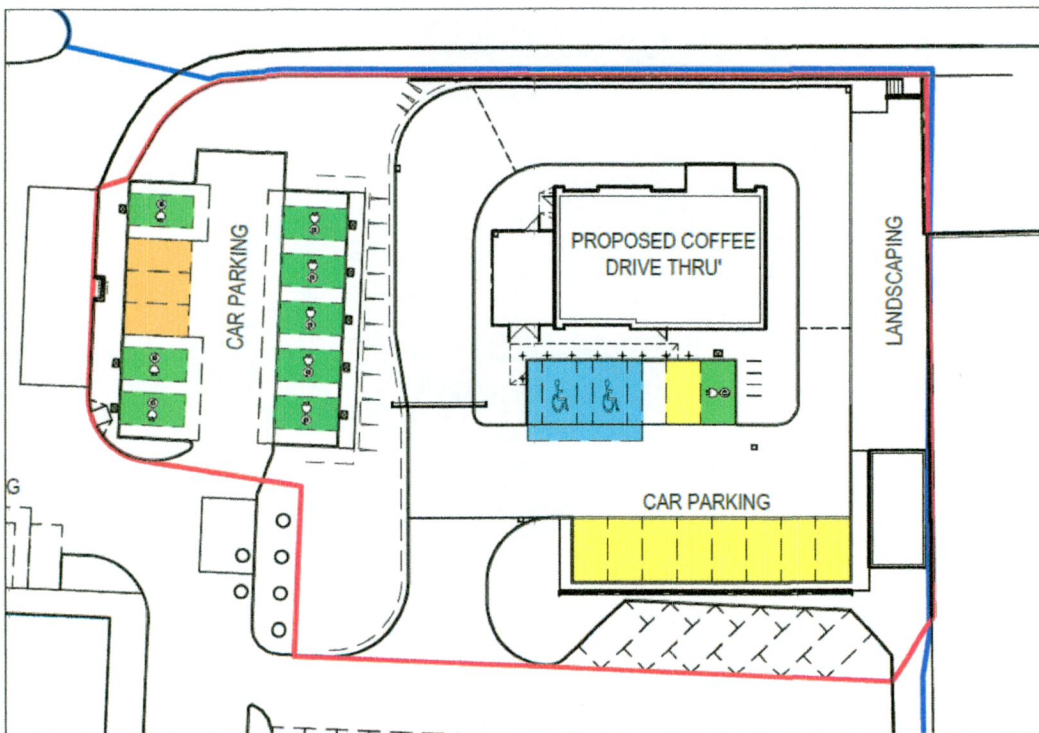
particular instance given this facility forms part of a dedicated service area and there is a need to promote EV charging space infrastructure along national roads and particularly T-Ten routes. The demand for EV charging spaces at service areas will increase as electric cars replace traditional fuel options and the charging infrastructure needs to be in place along these route. Service areas are a very different land use to other land uses in this regard and we submit that flexibility should apply.

PARKING SCHEDULE			
TYPE	No.	LEGEND	Notes:
GENERAL (1)	9		DRIVE-THRU': Inside of Drive-thru' facility
DISABLED PARKING	2		DRIVE-THRU': Inside of Drive-thru' facility
E-CHARGE	1		DRIVE-THRU': Inside of Drive-thru' facility
GENERAL (2)	3		FILLING STATION: Outside of Drive-thru' facility
E-CHARGE	8		FILLING STATION:Outside of Drive-thru' facility

A comparison of the car parking layout submitted at further information stage versus that currently proposed is provided below.

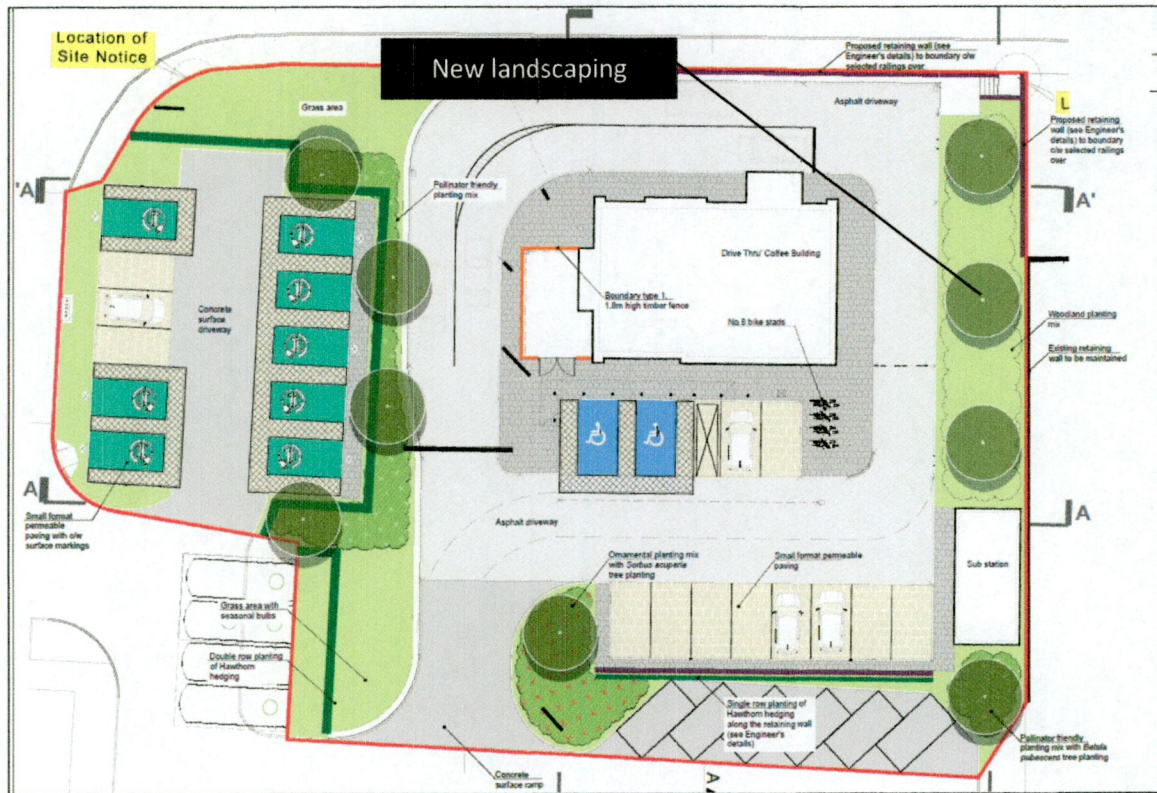


Car parking layout proposed at further information stage.



Car parking layout proposed at Clarification of Further Information Stage

A revised landscape plan prepared by Gannon & Associates is provided as requested.



Item No.2. Car parking serving the petrol station

The applicant has indicated existing car parking serving the petrol station. It is noted that some car parking is proposed within the red line boundary of the development site to serve the existing petrol station. The applicant is requested to **justify the level of car parking serving the petrol station**, including the proposed EV spaces, with regard to Table 12.25 of the Development Plan 2022 - 2028. Any parking spaces provided in excess of the maximum allowable rate can be removed from the southern bank of car parking within the red line boundary.

In relation to proposed car parking within the filling station a total of **11 car park spaces** are proposed consisting of 8 no. EV charge spaces and 3 general spaces.

Please be advised that **13 existing car park spaces** serving the filling station are being omitted as part of this planning application to facilitate the proposed new

development – spaces will be omitted to facilitate the new internal entrance and to facilitate the EV charging spaces. As such there is a **net loss** of 2 car park spaces (13 spaces omitted to facilitate 11 new spaces serving the filling station) in respect of the main filling station under the current application.

We submit that the above argument in respect of EV charging spaces as part of Service Stations again applies. We emphasize that the service station at Rathcoole is larger than most and is in effect a pseudo–Motorway Service Area. In this regard any flexibility applied to the current application will not automatically set a precedent for other filling stations and there are highly unlikely to be any other similar circumstances. This situation is quite unique. There is a need to promote EV charging facilities at this service station in order to facilitate what will be an increased demand by motorists into the future as the numbers of EV cars increases.

We refer the Council to the National Policy Framework Alternative Fuels Infrastructure for Transport in Ireland 2017 to 2030 which states that:

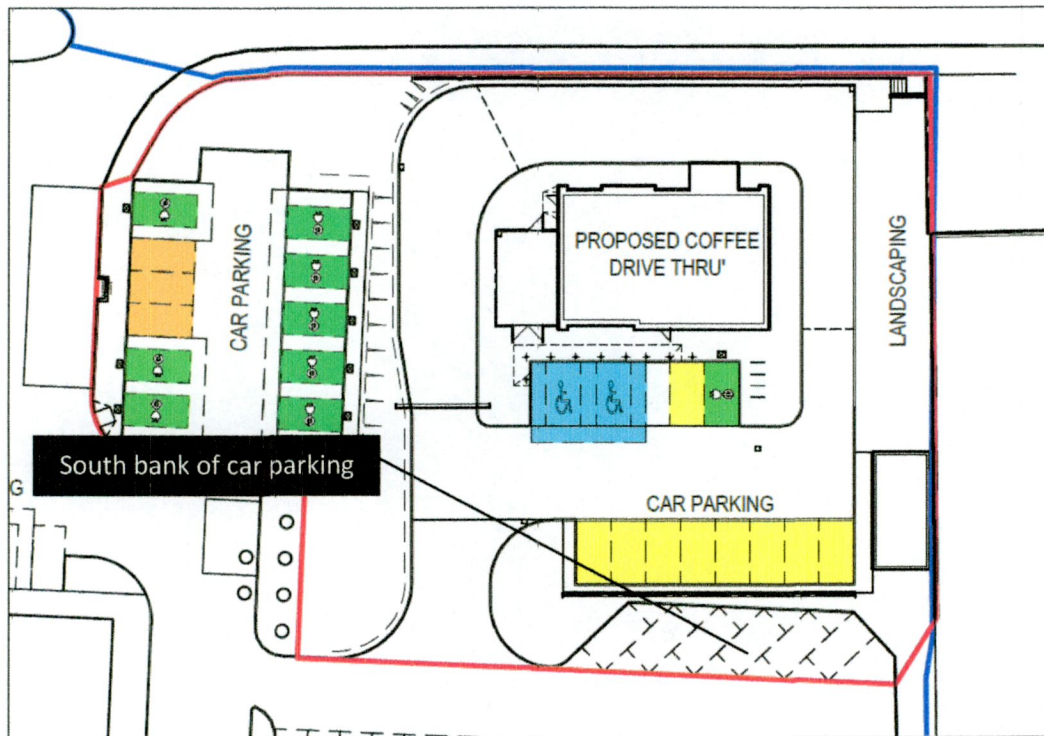
With regard to the EV charging network, to give people the confidence to switch to EV's, and ensure that the national charging network has a substantial supply buffer ahead of demand, measures include:

- *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 ...*
- *Work with the motor sector and retailers to rapidly expand the charging network on garage forecourts.*

It is confirmed that the proposed EV charging bays will be fast charging.

In relation to the south bank of car park spaces (which we assume to refer to the row of car parking outlined below) we submit that these are existing (permitted) spaces and

therefore the applicant does not want to remove some unless the Council consider this to be critical to a grant of planning permission. In such instance a suitable condition of planning permission can address this issue but the applicant wishes to highlight that they would be strongly against the removal of these existing spaces.



Please refer to the revised site layout drawing prepared by JA Gorman Consulting Engineers.

3. Surface water attenuation

*The proposed surface water attenuation system 25m³ is undersized by a factor of 3 for a 1 in 30 year storm event and undersized by a factor of 5 for a 1 in 100 year storm event. The applicant is request to Submit a **revised drawing and report showing increased surface water attenuation required**. Surface water attenuation should be provided by SuDS (Sustainable Drainage Systems) where this is possible and only when SuDS is at maximum capacity should alternative attenuation systems be considered. Consider replacing hardstanding areas with permeable paving such as at concrete pathways*

and other hard standing areas. The applicant should consult with the drainage section of the council prior to submitting a response on this issue.

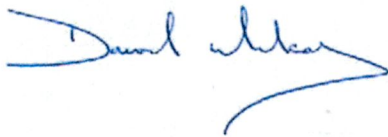
Please refer to the response prepared by JA Gorman Consulting Engineers consisting of a written response and drawings. An increased surface water attenuation has been provided as requested.

Conclusion

Each item raised by the Council has been addressed in detail. It is trusted that each item has been addressed to the satisfaction of the Council and we welcome a decision to grant permission in due course.

Please acknowledge receipt of the application in writing and continue to direct all future correspondence to the architect.

Yours sincerely,



David Mulcahy

David Mulcahy Planning Consultants Ltd
CHARTERED PLANNING CONSULTANTS

Enclosed.

1. Written response and drawings prepared by JA Gorman Consulting Engineers
2. Landscape plan prepared by Gannon & Associates.