

David Mulcahy Planning Consultants Ltd  
67, The Old Mill Race  
Athgarvan  
Co. Kildare

Date : 20-Feb-2024

**Reg. Ref. :** SD22A/0114/c10-1  
**Proposal :** 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.

**Condition 10:**

**Surface Water Attenuation**

The applicant is requested to submit a revised surface water drawing and report, for the written agreement of the Planning Authority, prior to the commencement of development. The applicant should note that underground surface water attenuation will only be considered as a last resort where it can be demonstrated that other alternative opportunities for attenuation have been exhausted.

**REASON:** In the interest of sustainable surface water drainage

**Location :** Applegreen, Naas Road Service Station, Tootenhill, Rathcoole, Dublin, D24DH00  
**Applicant :** Petrogas Group Ltd.  
**Application Type:** Compliance with Conditions

Dear Sir/Madam,

I refer to your submission received on 02-Jan-2024 to comply with Condition No 10 of Grant of Permission No. SD22A/0114, in connection with the above.

In this regard I wish to inform you that the submission received is deemed **not** compliant.

Comments:

**“Compliance submission:**

Submission received on the 02/01/24 from J.A Gorman Consulting including the following:

- Cover Letter
- Civil Engineering Report
- Proposed Site Layout Plan Showing SUDS Components and Details, Drawing No. PC83644-C004.

**Assessment**

Report from Parks & Public Realm Department in SDCC – Public Realm are **satisfied** that Condition 10 is being complied with.

However, the report from Water Services Department in SDCC have stated that they are **not satisfied** that Condition 10 is being complied with because the surface water attenuation has not been increased from that previously submitted (design strategy seems to have changed to soakaways, see notes below on this). Sustainable Urban Drainage Features (SUDs) have not been increased from that previously submitted:

*2.1 Provide above ground SUDs features for surface water run off. Above grounds SUDs are the preferred option, as they offer greater biodiversity as well as surface water treatment and attenuation. Water should be conveyed across site above ground, in swales/rills wherever possible, as opposed to being immediately conveyed by pipework.*

*SUDs Explanatory, Design & Evaluation Guide is available on below website:*

*[Sustainable Drainage Systems - SDCC](#)*

*2.2 If changing the design to use soakaways (SUDs is the preferred option and should be fully explored before soakaways are used), please supply*

*Provide a report detailing the calculations for soakaway sizing to BRE Digest 365 (calculations, not just results). Soakaways sizing details have been provided, but do not appear to be to BRE Digest 365. Include check on time to half empty (show all calculations).*

*2.3 There appear to be errors in the soil infiltration rate calculations, such as in Ap50 (LxD used instead LxW). Please check all calculations and revise reports as necessary. The filtration rate of 0.0003m/s for the Rathcoole area appears very high.*

*2.4 Calculations should use effective depth (ie depth from bottom of stone fill to invert of pipe). Surcharging of pipes/chambers should not be included in calculations.*

*2.5 Provide a drawing showing the location of filtration tests. Were the infiltration tests carried out in the vicinity of the existing culvert, which may explain the high filtration rate?*

*2.6 Overflow should be provided from the soakaway back to the surface water network*

*2.7 Drawing C0004, cross section A-A notes a fill with a minimum of 50% voids ratio. This appears extremely high, 30% would be more normal for a high voids ratio fill. It is difficult to see how higher than 50% is possible, and it is not likely to be achieved, especially once stone settles over time.*

Having regard to the Water Services report, it is considered that compliance submitted for Condition 10 in regard to Surface Water Attenuation and SUDs, is not satisfactory due to discrepancies and the lack of information surrounding SUDs features and calculations.

**Conclusion**

The submission does **not comply** with Condition 10.”

Yours faithfully,

M.C.

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*for Senior Planner*