Our Case Number: ABP-314597-22

Your Reference: Ard Services Limited

An Bord Pleanála

Coakley O'Neill Town Planning Limited
N.S.C. Campus
Mahon
Cork City
Co. Cork

Date: 05 July 2023

Re: BusConnects Galway Cross-City Link Scheme.
University Road to Dublin Road, Galway City.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned case. The contents of your submission have been noted.

If you have any queries in relation to the matter please contact the undersigned officer of the Board.

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

CH08

Teil	**Tel**	(01) 858 8100
Glao Áitiúil	**LoCall**	1800 275 175
Facs	**Fax**	(01) 872 2684
Láithreán Gréasáin	**Website**	www.pleanala.ie
Ríomhphost	**Email**	bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Niamh Thornton

From: LAPS
Sent: Tuesday 4 July 2023 16:56
To: Niamh Thornton
Subject: FW: Galway BusConnects Submissions
Attachments: Final Circle K_Scheme Galway CC Submission.pdf; Final Circle K_CPO Galway CC Submission.pdf

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From: Alan O'Callaghan | Coakley O'Neill <Alan@coakleyoneill.ie>
Sent: Tuesday, July 4, 2023 4:07 PM
To: LAPS <laps@pleanala.ie>
Subject: Galway BusConnects Submissions

To whom it may concern,

I write on behalf of our client Ard Services Ltd (Trading as Circle K) in relation to Galway City Council's submission to the public consultation phase of the proposed Galway BusConnects Cross-City Link (University Road to Dublin Road) Bus Corridor Scheme under the Strategic Infrastructure Development Process.

In accordance with *Section 217B of the Planning and Development Act 2000, as amended,* I enclose 2no. submissions on behalf of our client – 1 in relation to the Scheme and 1 in relation to the proposed CPO of lands in their ownership.

I would be grateful if you could confirm acceptance of these submissions at your earliest convenience and look forward to hearing from you in due course.

Regards,
Alan O'Callaghan MPlan MIPI
Assistant Planner

Coakley O'Neill Town Planning Ltd
NSC Campus
Mahon
Cork
T12 XY2N

COAKLEY O'NEILL
town planning

M: 085 7809790
E: alan@coakleyoneill.ie
W: www.coakleyoneill.ie

COAKLEY O'NEILL
town planning

Strategic Infrastructure Department
An Bord Pleanála
64 Marlborough Street
Dublin 1

Our Ref: CON23112

4th July 2023

RE: SUBMISSION ON STRATEGIC INFRASTRUCTURE DEVELOPMENT ABP REF: HA61.314597. BUSCONNECTS CROSS-CITY LINK (UNIVERSITY ROAD TO DUBLIN ROAD) SCHEME AND GALWAY CITY COUNTY SUBMISSION FROM THE 8TH FEBRUARY 2023.

A Chara,

We, Coakley O'Neill Town Planning Ltd. of NSC Campus, Mahon, Co. Cork, are instructed by our clients, Ard Services Limited, of Circle K House, Beech Hill Road, Clonskeagh, Dublin to make this observation to An Bord Pleanála in relation to the proposed Galway BusConnects Cross-City Link (University Road to Dublin Road) Bus Corridor Scheme under the Strategic Infrastructure Development Process (Application Reference HA61.314597) which concerns lands at the Circle K College Road Service Station, College Road, Galway.

We do welcome the opportunity to make a further submission to the Board in respect of Galway City Council's response of the 8th February 2023 to our clients' initial submission of the 17th November 2022.

As set out in this initial submission to the Board previously, our clients have a material interest in this application as lands in their ownership fronting onto College Road were outlined as being subject to both permanent and temporary CPO acquisition to facilitate the proposed scheme.

We again wish to highlight that our clients are not objecting to the scheme as a whole. They are very supportive of any scheme that promotes more sustainable forms of transport within Galway City, which will alleviate the pressure placed on the city's roads by cars.

However, in our initial submission it was detailed that our clients cannot wholly accept the proposal in its current iteration owing to the potential significant harmful and detrimental impacts it may have on the continued day to day operation, and ultimately viability, of their College Road service station going forward.

This remains the case as the Council's response to their submission has not addressed the matters raised in any meaningful or material way.

Hereunder we set out their concerns in relation to the published scheme.

Introduction

Circle K Ireland is the country's largest fuel and convenience retailer with 420 employment locations across the country. They are owners (through subsidiary Ard Services Ltd.) and operators of the Circle K College Road service station in Galway City, which has been providing a local service in the area for over 20 years.

Site Location and Description

The site that is the subject of this observation is located in the College Road area of Galway City, approximately 1km to the northeast of the city centre. It is situated just south of the junction of Old Dublin Road and College Road, on its northern side. The service station site has an area of c.0.16ha and comprises a forecourt, store, service area, car wash and associated parking. Vehicular and pedestrian access to the Circle K service station is via two entrances off College Road. The front boundary of the site is defined by a low block wall with the station forecourt canopy extending towards same. The immediate surrounding area is mainly in residential use.

Figure 1 – Site location in context of surrounding area (Source: MyPlan.ie) (annotated by Coakley O'Neil Town Planning Ltd, 2022).

Figure 2 – View of Service Station (Source: Google Maps, 2022)

Planning History

The commercial nature of the site is long established, and it has been in use as a service station for an extended period of time. It has been subject to a number of planning permissions, as follows:

- **Application Reg. Ref 92374:** Conditional permission granted for Concoc Ireland Ltd on the 22nd of July 1992 for alterations to front facade and internal alterations to shop building.

- **Application Reg. Ref 96792:** Permission granted for Statoil Ireland Ltd on the 3rd of March 1997 for the erection of new illuminated advertising signs to canopy facia, shop & forecourt, also non-illuminated advertising signs and retention of existing signs.

- **Application Reg. Ref 9897:** Permission granted for Statoil Ireland Ltd on the 14th of May 1998 for redeveloping a service station, consisting of the demolition of existing buildings and canopy and the construction of a new retail shop building, new illuminated canopy, new underground tank farm, new car washes, new environmental point.

- **Application Reg. Ref 99711:** Permission granted for Statoil Ireland Ltd on the 5th of April 2000 to retain unauthorised works consisting of (1) unauthorised forecourt canopy, (2) unauthorised expansion of shop stores, (3) unauthorised shop façade and (4) unauthorised illuminated main identification sign.

Local Planning Policy

The relevant statutory development plan which governs the site is the Galway City Development Plan 2023-2029. The site is zoned ***Enterprise, Light Industry and Commercial***, whose objective is to *provide for enterprise, light industry and commercial uses other than those reserved to the CC zone.*

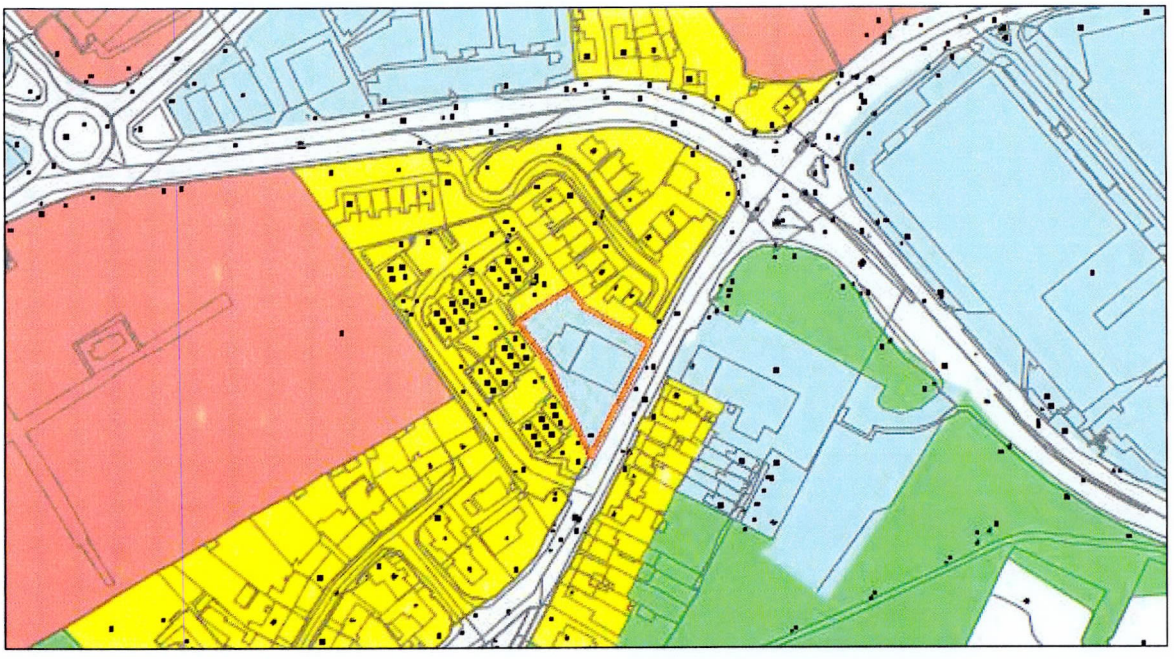

Figure 3 – Site in context of Galway City Development Plan 2017-2023. (annotated by Coakley O'Neil Town Planning Ltd, 2023).

Context of Submission

The initial submission on the 17th November 2022 was in relation to the overall scheme associated with the Galway BusConnects Cross-City Link (University Road to Dublin Road) Bus Corridor. As outlined previously, our clients have significant interest in the proposal owing to the potential significant negative impact of the scheme on their College Road Service Station, which was proposed to be subject to both permanent and temporary acquisition.

These CPO acquisitions were premised on facilitating a series of changes to the public roadway directly outside the service station, including:

- the introduction of a section of inbound cyclelane on the southern side of College Road between its junction with the Moneenageisha Road to its junction with the Lough Atitla Road, a length of c.200m
- the introduction of an outbound bus lane on the northern side of College Road between its junction with the Moneenageisha Road to its junction with the Lough Atitla Road, a length of c.200m
- the retention and extension of the existing right turn lane from College Road to the Dublin Road
- the removal of existing right turn (inbound) into the service station for inbound traffic on College Road. It is also not clear if the existing left and right exit arrangements from the station will be detrimentally impacted.

These proposals are shown below.

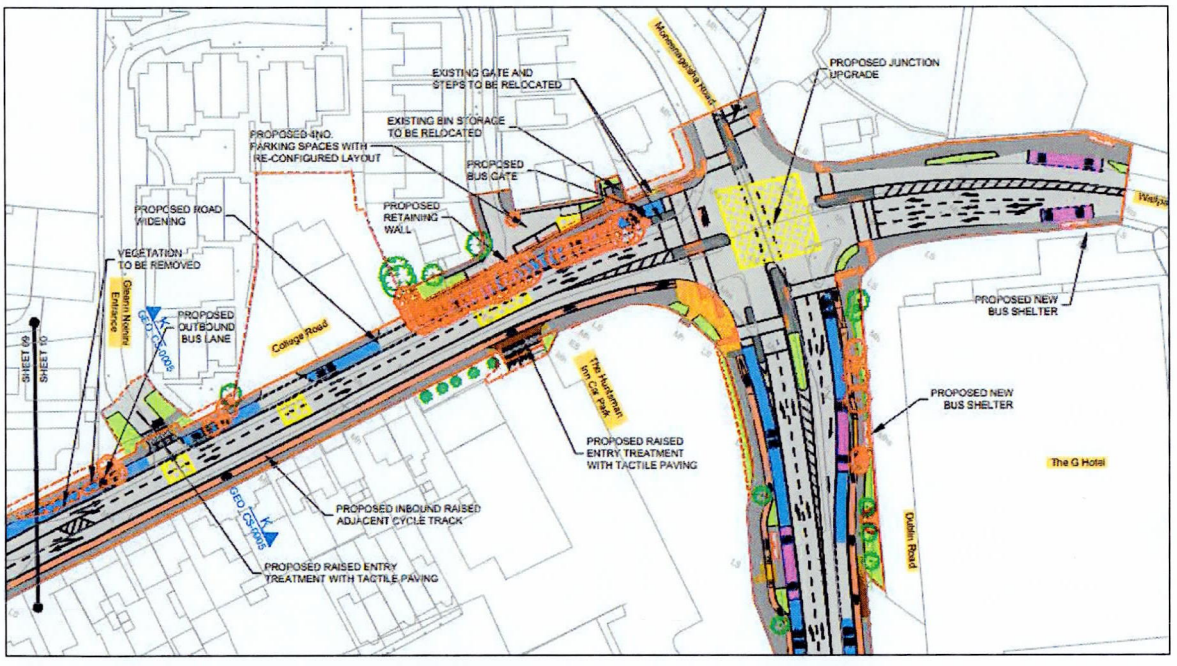

Figure 4 – Scheme Plan for College Road. (Source: ARUP, 2022).

As evident above, the proposed BusConnects scheme seeks permission for the acquisition of land in our client's ownership. This consisted of all land in our client's ownership in this location on a temporary basis as well as a section fronting College Road being acquisitioned on a permanent basis. This was outlined as follows:

- 211.5m² of land is to be permanently acquired by the Council under Part 1 of the CPO – **Compulsory Purchase Order No. CCL-CPO-001,2022#**

- A further 1457.3m² (i.e. the entire service station) is to be temporarily acquired by the Council under Part 2 of the CPO – **Compulsory Purchase Order No. CCL-CPO-001,2022**

Together, these cover the entire service station site.

As a result of the planned scheme, it was submitted that the loss of land both permanently and temporarily to accommodate the BusConnects route would have serious implications for the overall business and its future viability.

Galway City Council Response:

In accordance with *Section 217B of the Planning and Development Act 2000, as amended,* this submission is made in respect of Galway City Council's submission from the 8th February 2023. It has particular regard for the Council's response set out under **Section 2.3 03** titled **– Circle K/Ard Services Limited**

The Board will be aware of the potential impacts that the BusConnects route would have on the overall operation of the service station. These issues are detailed in the City Council's responses which are outlined below.

> ***Response (i)***
> *The Proposed Scheme underwent an options assessment process for each of the sections along route corridors and in terms of design options along the final route identified.*
>
> *A Multi-Criteria Analysis (MCA) was carried out on route options in order to determine the preferred option for the Proposed Scheme. The options were assessed under a series of criteria including Economy, Safety, Physical Activity, Environment, Accessibility and Social Inclusion, Integration and GTS Policies. These criteria were further broken into relevant sub-criteria for assessment purposes. All elements were considered in combination with all the other criteria and sub-criteria in order to determine the preferred option for each section of the scheme. Along this section of College Road, it was determined that road widening is necessary to meet the objectives of the Proposed Scheme and the transport network.*
>
> *This road widening will encroach onto the existing Circle K Service Station on College Road. Due to the nature of the development, and the dangers associated with working on or over flammable substances, it will be necessary to temporarily decommission the entire Filling Station while the works on the site are being carried out, to ensure the works are completed safely and in accordance with regulations.*

It is acknowledged and accepted that the proposed scheme and compulsory purchase order will have an impact on the operation and financial reconfiguration of the current service station. A response relating to the CPO of this property is provided in Section 3.2 of this report.

Response (ii)

It is acknowledged that the proposed scheme will have an impact on some of the existing parking bays located within the existing development. Appendix C, 'Preliminary Parking Survey Report', contained in the Preliminary Design Report for the proposed scheme, identifies that there are approximately 11 no. parking spaces currently located within the entire service station development. This report identifies that 4 no. existing parking spaces will be required to be removed arising from the Proposed Scheme (not 11 no. as suggested in the submission).

Response (iii)

It is acknowledged and accepted that the proposed scheme and compulsory purchase order will have an impact on the current service station. A response relating to the CPO of this property is provided in Section 3.2 of this report.

The proposed scheme does not intend "the removal of existing right turn (inbound) onto the service station for inbound traffic on College Road" as suggested. While the design drawings indicate a continuous white line along College Road in this location, the Traffic Signs Manual, Section 7.3.26 states: "It should be noted that drivers may cross a Continuous Line (whether a single line RRM 001 or one that is part of a Double Line System) to enter or leave land or premises on the right-hand side of the road. It is not necessary, therefore, to break the line at such locations. However, a Continuous Line should generally be broken across a junction by provision of five marks of RRM 003C line." In this instance, access to the filing station premises is not restricted.

Response (iv)

The proposed scheme underwent an options assessment process for each of the sections of the proposed scheme as described in response to Submission Issue (i) above. Option CRM1, presented in Section 4.6 of the Options Assessment Report, included an evaluation of both alternatives suggested within the submission. It was determined that this option did not meet the objectives of the proposed scheme.

Furthermore, in consideration of alternative options along this section of the route of the Proposed Scheme, as set out in the Options Assessment Report, this section of the Proposed Scheme, between Lough Atalia Road and Moneenageisha junction, incorporates both the Cross-City Link and the City Centre Access Network as identified in the GTS, there this section of the Proposed Scheme is required to meet the needs of this strategic route in terms of catering for general traffic movements, particularly orbital movements around the city centre.

It is further noted that an alternative option considered, Option CRM3 in the Options Assessment Report, did demonstrate higher benefits than the final design solution adopted for the Proposed Scheme, but was not selected due to negatives associated with the further increase in land acquisition that would be necessary to

achieve this. This alternative option would have resulted in further encroachment into the Circle K development, had it been chosen.

As the route of the Proposed Scheme at this location also coincides with part of the Galway Cycle Network identified in the GTS (as a 'secondary route'), the Proposed Scheme takes account of this in terms of the infrastructure provided. Providing the appropriate balance between property impact and achieving the objectives of the Proposed Scheme and acknowledging the continued heavier traffic movements at this location compared to the core city centre area (as part of the 'City Centre Access Network'), the final design solution provides for a shared use bus lane for cyclists travelling eastbound and segregation in the form of a cycle lane in the westbound direction. The suggestion made in the submission that the westbound cycle lane could be dropped to minimise impact would not provide any improvement in level of service or safety for cyclists who use the route and is therefore not considered appropriate to adopt as a solution.

Response to Local Authority

Taking the view that the Council's response to their submission has not addressed the matters raised in any meaningful or material way, our clients' position remains as set out in their initial submission – opposition to this element of the scheme and its associated CPO owing to the potential significant harmful and detrimental impacts it may have on the continued day to day operation, and ultimately viability, of their College Road service station going forward.

Our clients' note the Council's acknowledgement that the Proposed Scheme and its associated CPO will have a detrimental impact upon the operation of their service station. Indeed, this recognition has already been set out and established in the EIAR accompanying the planning application.

Our clients' contend that the extent of impact is largely underestimated and pointed to this fact in their initial submission on the application to the Board. They put forward what they considered reasonable alternatives / modifications to the Proposed Scheme, which would help mitigate the impact upon their property.

In their view, the Council's response to their submission, continues to misjudge and underestimate the significance of the impacts arising.

The extent of impact on the operation and viability of the service station is again clearly set out in the submissions of our clients themselves and their consultation engineers, McArdle Doyle, both appended here.

It is evident that the closure of the station, even on a temporary basis, will have a significant impact upon its viability, not just for the period of closure but into the future, given the full diversion of trade to other stations that will occur as a result of said closure.

The temporary closure also poses significant difficulties for our clients in respect of the length of time involved in the decommissioning works and their implications for the continued operation of the station. Indeed, it is a likelihood that the station may, as a result, have to be demolished and rebuilt.

Given the very small size of the site, the loss of parking spaces at the site is likely to be permanent as no other appropriate space will be available to accommodate same. The loss of circulation space within the station site will also impact on parking availability and safe and effective access and egress at the station.

The Council's response contends that 4 no. parking spaces will be lost. Our clients submit that its will be 11 no. spaces.

The loss of two of the four pump stations will greatly affect the business' ability to generate revenue and significantly endanger its future commercial viability going forward.

As indeed, will the loss of the existing right turn manoeuvres into the station from the College Road and the potential loss of existing exit arrangements. The Council's response contends that while a continuous white line is to be put in place this theoretically does not stop vehicles turning into the station. Technically that may be so, but we suggest that to the majority of drivers a continuous white line indicates turning is not appropriate. This perception will be enough to impact the operation of the station through a loss of custom.

In all, it is evident that the planned BusConnects scheme will have a dramatic detrimental impact upon the operation of this long established and permitted service station, to the extent that the use may no longer be viable.

Turning to other points, the Council's response states that:

> *...Option CRM1, presented in Section 4.6 of the Options Assessment Report, included an evaluation of both alternatives suggested within the submission*

Upon review, we are not sure that this option did evaluate the alternatives suggested in our clients' initial submission, which were as follows:

- The removal of the small extent of cycle lane proposed on the southern side of College Road
- The reduction of the length of the proposed extended right turn lane onto the Dublin Road.
- The reinstatement of the right turn into the service station

The Council's response also states that:

> *Along this section of College Road, it was determined that road widening is necessary to meet the objectives of the Proposed Scheme and the transport network.*

It is worth noting what the objectives of the Proposed Scheme are, as outlined in the EIAR accompanying the application:

> *The Proposed Scheme aims to improve access along the corridor which will enable and deliver efficient, safe, and integrated sustainable transport movement to meet travel demand. The objectives of the overall BusConnects programme are to:*

- *Enhance the capacity and potential of the public transport system by improving bus speeds, reliability and punctuality through the provision of bus lanes and other measures to provide priority to bus movements over general traffic movements;*
- *Enhance the potential for cycling by providing safe infrastructure for cycling, segregated from general traffic wherever practicable;*
- *Support the delivery of an efficient, low carbon and climate resilient public transport service, which supports the achievement of Ireland's emission reduction targets;*
- *Enable compact growth, regeneration opportunities and more effective use of land, for present and future generations, through the provision of safe and efficient sustainable transport networks;*
- *Improve accessibility to jobs, education and other social and economic opportunities through the provision of improved sustainable connectivity and integration with other public transport services; and*
- *Ensure that the public realm is carefully considered in the design and development of the transport infrastructure and seek to enhance key urban focal points where appropriate and feasible.*

It is our view, which we submit to the Board, that the road widening proposal impacting the station is largely as a result of the intention to increase the length of the right turn traffic lane onto the Dublin Road from 120m to 160m.

We contend that this has more to do with facilitating private car movements than meeting the objectives of the proposed scheme, as they are set out above. On this basis, it is our view that it has not been demonstrated that the proposed right turn lane extension meets with the objectives of the Proposed Scheme.

No justification for this increased length of right turn lane is apparent and it is certainly not addressed in the Council's response. The submission of MHL Consulting Engineers, appended here, goes into further detail on this point.

As a result, the Council's response is extremely disappointing to our clients', given that the extension of the right turn lane is a key part to establishing a need for the CPO of our clients lands, which will ultimately result in significant negative implications for the service station's continued operation and viability.

For these reasons, our clients wish to state their objection to the CPO acquisition put forward by the National Transport Authority in respect of their lands, in addition to their associated SID Application to An Bord Pleanála as it relates to same.

Two reasonable options still present themselves.

- The removal of the small extent of cycle lane proposed on the southern side of College Road would result in a significantly less dramatic impact on our clients business

- The reduction of the length of the proposed right turn lane onto the Dublin Road. We find no justification for the full retention and actual extension of this right turn lane, which is to facilitate vehicular traffic, particularly that this scheme is entirely focused on the enhancement of public transport and active travel measures in the city.

It is again submitted that the exclusion of these elements of the scheme will have no material effect on the benefits of the overall proposed BusConnects scheme and would not in any way undermine its overall objective of facilitating sustainable transportation in the city, which, it must be pointed out, should be properly achieved without undue negative impacts upon businesses in this area and especially without impacts that will severely impact viability of local businesses.

Should one, or both, of these reasonable options be advanced there would be no requirement for the CPO of our clients' lands and any subsequent disruption to their business can be avoided.

Please forward all correspondence in relation to this observation this office.

Is Mise le Meas,

Alan O Callaghan

Alan O'Callaghan
Assistant Planner
Coakley O'Neill Town Planning Ltd.

APPENDIX 1: CIRCLE K RESPONSE

Part of Alimentation Couche-Tard

July 4, 2023

An Bord Pleanala
64 Marlborough Street
Dublin 1
D01 V902

Re: BusConnects Galway, Cross-City Link Scheme - University Road to Dublin Road, Galway City Compulsory Purchase Order Application
Case Number: ABP-314597-22

Dear Sirs,

We write to you in response to your letter dated 31 May 2023, regarding the proposed Compulsory Purchase Order relating to the BusConnects Galway, Cross-City Link Scheme.

The proposed scheme BusConnects Galway, Cross-City Link Scheme – University Road to Dublin Road will have a direct impact on the Circle K Service Station, College Road, Galway, H91 E3TW. In our capacity as owner, under Proposed Compulsory Purchase Order No. CCL-CPO-001, 2022 we were notified of a proposed permanent land acquisition of 211.5m2 (0.02115 ha/0.052 acres) and a proposed temporary land acquisition of 1,457.3m2 (0.14573ha/0.36 acres).

We have reviewed the 'Galway City Council Observations on the Proposed Scheme Submissions and CPO Objections'. We note, at this juncture, that there does not appear to be any material change to the proposed Compulsory Purchase Order, which affects the service station and ancillary lands.

As highlighted in our previous submission, it is clear the proposed Compulsory Purchase Order will have a devastating impact on our trading business and premises, rendering it unavailable to operate and trade for a substantial period of time. Not only will the business be affected from an operational perspective, in addition, costly and extensive infrastructural and reconstruction works will be required.

The proposed CPO will necessitate substantial reconstruction and infrastructural works. The proposed permanent land acquisition will require the removal of two roadside fuel dispensers together with support columns which form part of the service station building structure and fabric. The required removal of the two fuel dispensers along with structural support stanchions will necessitate the demolition and replacement of the existing forecourt canopy, which also alters the structure and fabric of the service station building. Substantial reconstruction works will be required, not only incurring significant costs but also forcing the station to remain closed for operations for an extensive period of time. A planning application may also be required for the reconfiguration and reconstruction of the canopy/service station. Accordingly, the service station will be rendered unable to trade and nonoperational during this time, decimating our business.

Division Address
Circle K Ireland Energy Limited
Circle K House,
Beech Hill,
Clonskeagh, Dublin 4

Telephone
+353 1 2028888

Fax
+353 1 2039888

Part of Alimentation Couche-Tard

The Proposed Order will reduce the overall site area by up to 12.5%, which in turn greatly reduces the reconstruction footprint compared to the existing station. This decrease in site area inherently reduces our trading capacity, future expansion plans and development for the site. A consequence of this proposed Compulsory Purchase Order is a direct and substantial loss of trade and profits to our business. The proposed permanent acquisition will require the removal of two roadside fuel dispensers which will reduce our fueling facilities by 50%, with four of the eight fueling locations being removed. Tradability and profitability will be further eroded as the proposed CPO will negatively impact customers, accessing, navigating, parking and exiting the service station. The reduction in fuel dispensers will create delays and queues for refueling, while also impacting customers navigation around the service station. Furthermore, the proposed CPO will also result in the loss of eleven parking spaces. Convenience of service, navigation and parking are key attractions for customers. Queuing delays, difficulties navigating, and reduced car parking will all act as a deterrent to customers entering the service station. The proposed CPO will have a grave effect upon our existing customer base which directly effects the trade, goodwill and profits of the service station. The proposed land acquisition reduces the overall site area which also dilutes our ability to facilitate the development of electric vehicle charging facilities at the service station.

The potential loss of customers is further compounded through the potential loss of the existing right turn (for inbound traffic) into the service station on College Road. Any change of access into the service station will detract customers from accessing and entering the service station which will further reduce our customer base and trade capacity substantially.

Further substantial infrastructural works which would be required under the proposed CPO is the requirement to decommission, remove and replace the entire existing fuel pipework as the current system would be located outside this new site boundary. Similarly, the new site boundary delineation will require existing Stormwater and Contaminated Stormwater drainage to be removed and replaced as the current system will be encroaching onto what will become public land. To facilitate these works, the service station would effectively be unable to operate for a length of duration of time in order to facilitate construction works. Reconstruction works of this nature will incur immense disruption our operating business and displacement of our customer base.

To demonstrate a further impact on trading capacity, a fuel underground storage tank currently located within the proposed permanent land acquisition will require decommissioning and removal. Appropriate hazard zones around the tank could not be accommodated within the proposed site boundary reconfiguration and will result in an encroachment on what will become public land. As the decommission and removal of the tank will be required, the loss of such tank will further impede our operating capacity, as the current fuel storage capacity on site would be reduced by 20%. As a result, additional fuel deliveries to the site will be required, which again carries a direct negative impact upon our trading ability and operational efficiency. There are no alternative locations on site to accommodate a replacement tank.

Based on an extract from the EIAR Galway BusConnects Cross City Link we understand the proposed temporary land take will result in a closure of 20 weeks, to facilitate the works from College Road to junction at Moneenageisha. Effectively, the business will be closed to trade for the duration of the

Division Address
Circle K Ireland Energy Limited
Circle K House,
Beech Hill,
Clonskeagh, Dublin 4

Telephone
+353 1 2028888

Fax
+353 1 2039888

Part of Alimentation Couche-Tard

temporary land acquisition. This will result in the loss of operational property and customer trade due to the works disruption. It is our first-hand experience that any such temporary disruption on site will lead to a temporary loss of trade but moreover, it will also result in a permanent loss of customer base due to changes in customer behaviour during this intervening period, due to the disruption to site entry, exit and visibility during the period. Have no doubt that this will have a permanent effect.

Located within the boundary of the proposed temporary acquisition are fuel storage tanks. As outlined above, the proposed temporary acquisition is likely to exceed a period of three months. Consequently, the permanent decommissioning, removal and replacement of the fuel storage tanks will be required. Once again this will have a significant disruption and cost on our business.

We wish to put it on record that we support sustainable public transport initiatives however we simply cannot support the proposed CPO scheme and continue to vehemently object to the current proposal at our service station for the concerns outlined above and contained within this Objection. The proposed CPO will undoubtedly result in the service station being nonoperational for a lengthy and undefined period of time, having a devasting impact on our business. The proposed CPO will potentially render the service station unviable through the erosion of trade from the reduction of fuel infrastructure, loss of vital customer parking and circulation space together with loss of sales/earnings through forced operational closures and displacement of customer base. Similarly, enormous costs will be incurred through the infrastructural and reconstruction works required as a result of the proposed CPO.

In conclusion, we maintain our position that we do not accept the proposed CPO and vehemently object to it. We understand that An Bord Pleanala intends to hold an oral hearing in relation to the determination of the proposed scheme and we would welcome the opportunity to attend this hearing.

Yours faithfully

Gordon Lawlor
Circle K Ireland

Division Address
Circle K Ireland Energy Limited
Circle K House,
Beech Hill,
Clonskeagh, Dublin 4

Telephone
+353 1 2028888

Fax
+353 1 2039888

APPENDIX 2: MHL CONSULTING ENGINEERS RESPONSE

CONSULTING ENGINEERS

SUBMISSION REGARDING BUSCONNECTS GALWAY CPO ON BEHALF OF CIRCLE K COLLEGE ROAD SERVICE STATION	
Project Title:	BusConnects Galway: Cross-City Link (University Road to Dublin Road) Scheme CPO
Author:	Mr. Conor O Brien ME Eng. MIEI
Approved & Checked:	Mr. Brian Loughrey BE CEng. MIEI
Date:	04/07/2023
Subject:	Submission to An Bord Pleanála, CCL-CPO-001, 2022
MHL Document Ref:	23090TT-Doc02

1. Introduction

MHL Consulting Engineers have been engaged by Circle K Ireland Energy Limited, owners of the Circle K Service Station on College Road, Galway who are not opposed to the scheme in principle however, they are opposed to the current proposals of the 'Bus Connects Galway Cross City Link', which greatly impacts their site and business. The specific section of the proposed scheme they are objecting to is College Road between the Lough Atalia junction and the Moneenageisha/Dublin Road junction. The roads authority proposed to acquire some of the Circle K property on a permanent basis and the entire property on a temporary basis via the Compulsory Purchase Order process, in order to facilitate the construction of their proposed BusConnects Scheme. This submission is being made to An Bord Pleanála in relation to the proposed Compulsory Purchase Order No. CCL-CPO-001, 2022 (Reference KA61.314654).

See Site Location Map of the Circle K service station in Figure 1 below, with the proposed eastern extremity of the scheme CPO site extents outlined in red colour.

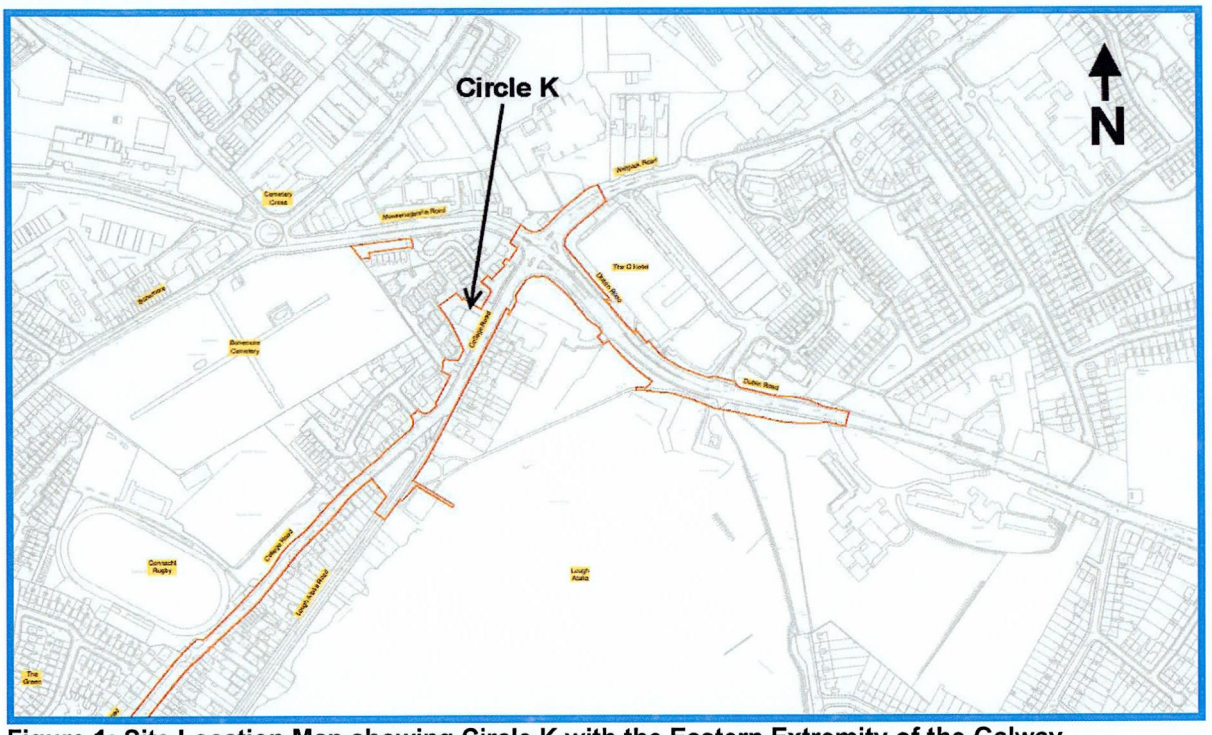

Figure 1: Site Location Map showing Circle K with the Eastern Extremity of the Galway BusConnects Cross-City Link Scheme Extents outlined in Red

2. Existing Conditions

The impacted business is the Circle K Service Station, College Road, Galway as shown in Figure 2 below. The service station consists of four fuel dispensing pumps, a hardstanding forecourt covered with a canopy, six underground fuel storage tanks, two car wash units and a convenience store. The business has been operating in this location for approximately 30 years providing a convenient refuelling and retail location for the local community.

The service station is located along Galway's College Road, the R339, approximately 1km north east of Galway City Centre. The service station is located just 100m south of the junction of the Old Dublin Road and College Road, known as the Moneenageisha Road junction. The service station site is accessed via two number, two-way entrances onto College Road. These entrances are used by pedestrians, cyclists, cars and all road vehicles including delivery tankers. The existing cross section of the road measures approximately 13.5m in width. Within this cross section are footpaths along both sides of the road which are greater than 2m wide and three number traffic lanes. There are two number northbound lanes and one lane in the south city-bound direction.

Figure 2: Impacted Property Site Location Map

3. Proposed Scheme

The proposed BusConnects Scheme at this location includes a 3.25m wide northbound bus lane, 3 x 3m wide traffic lanes (2 northbound, 1 southbound), a 2m southbound cycle track and 2 x 2.0m footpaths. To accommodate this cross-section, it is proposed to set back the existing boundary of the service station by approximately 4.25m. This will impact on much of the existing infrastructure in the service station including two of the underground fuel tanks, two of the pumping stations, the existing underground pipe network, the existing canopy over the forecourt and the existing display signage. The loss of this infrastructure will have extremely significant negative impacts on the operation of the business. Figure 3 below shows the proposed cross section of the scheme while Figure 4 shows a plan view of the proposed scheme as it passes in front of the site.

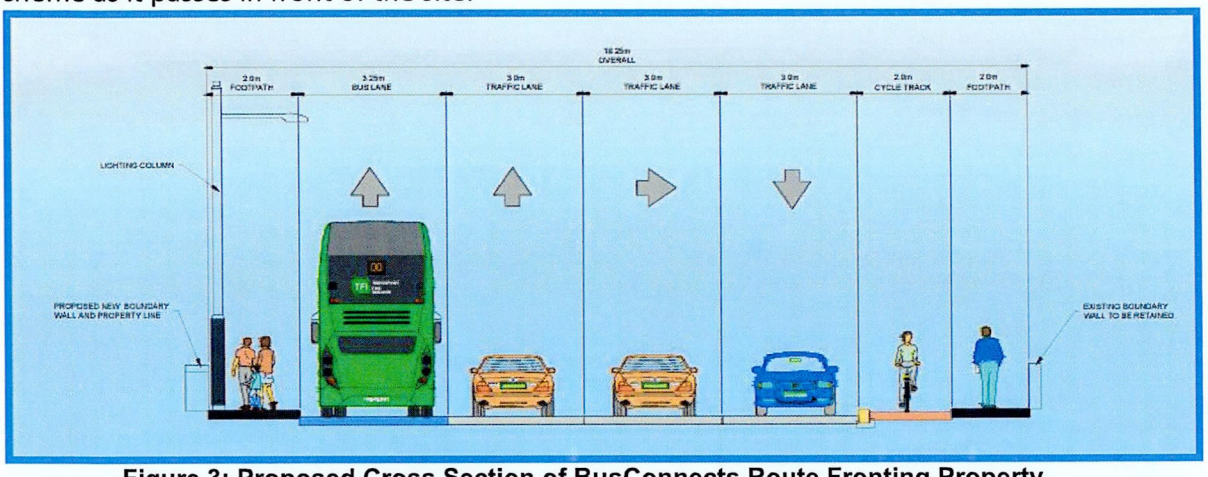

Figure 3: Proposed Cross Section of BusConnects Route Fronting Property

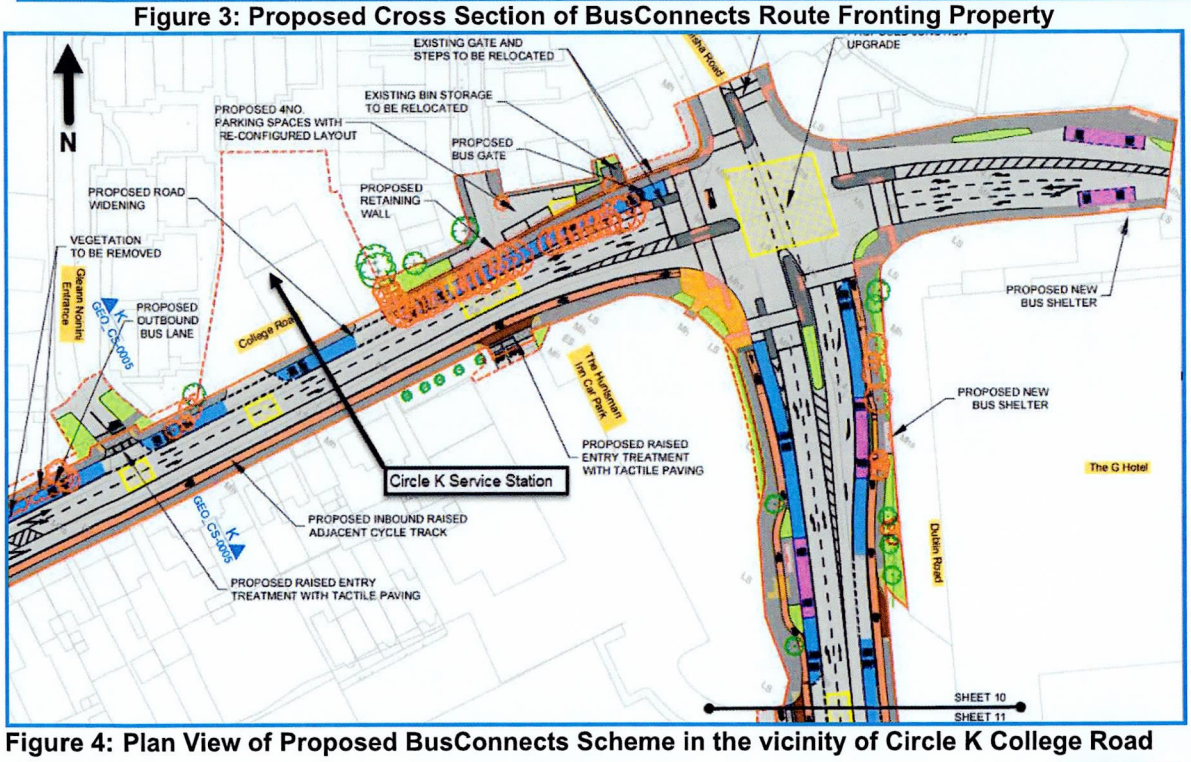

Figure 4: Plan View of Proposed BusConnects Scheme in the vicinity of Circle K College Road

4. Proposed BusConnects Scheme Impacts & Issues

The following are a number of concerns our client has raised in relation to the published CPO associated with the Galway BusConnects Cross City Link. The CPO seeks to permanently acquire a 4.25m wide strip at the front of the property resulting in a total of 211.5m^2 area of land take. It is also proposed to temporarily acquire the entire service station site during the works, a total area of 1457.3 m^2 of land take. See Figure 5 below which shows an extract from the CPO Server Map which was issued by Galway City Council to Circle K Ireland.

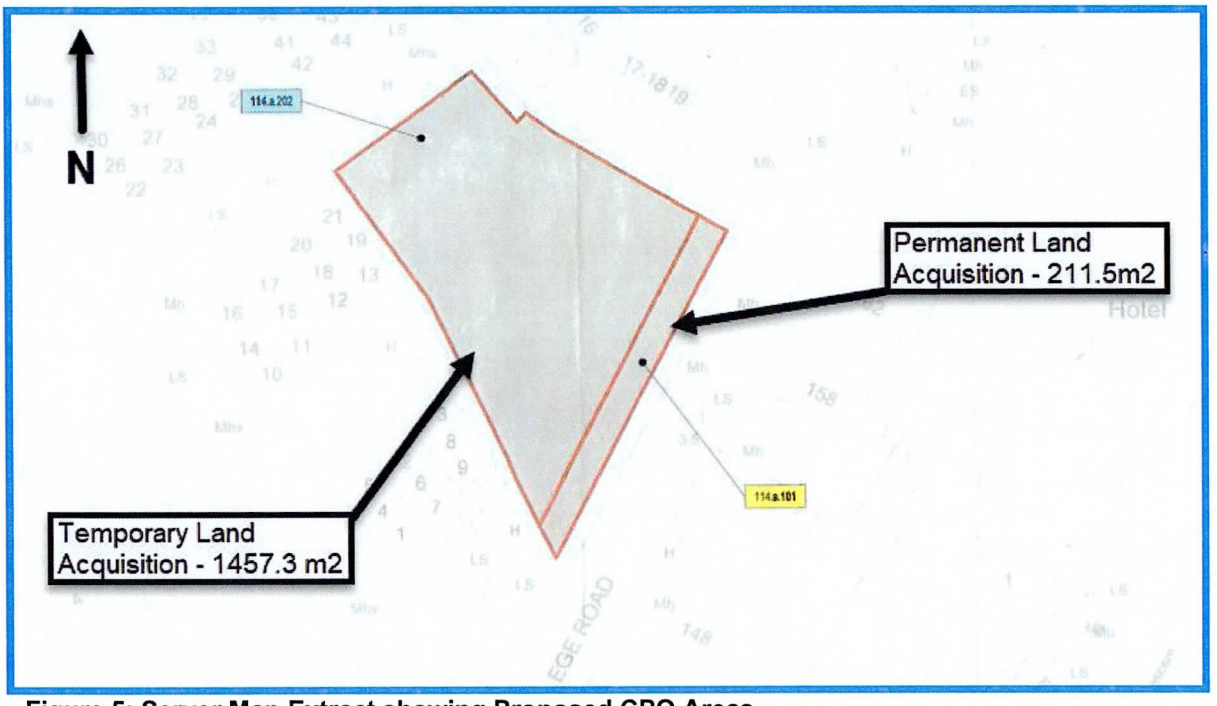

Figure 5: Server Map Extract showing Proposed CPO Areas

4.1 Access and Egress to the Site Issues

The service station site currently benefits from 2 number entrance/exit points along College Road. These entrances are integral to the operation of the business as it allows vehicles to enter in one side of the site and exit through the other side. This removes the requirement for vehicles to turn in the forecourt where space is limited. It is also a requirement for the fuel tanker making deliveries to the site to use both entrances as there is no space for a vehicle of that size to turn within the site.

The current road layout also allows for the right turn movement for southbound vehicles into the site. It is not clear whether this movement is retained in the proposed layout. A yellow box has been shown outside the southern entrance suggesting vehicles may be able to turn into the site from the southbound lane however, a continues white line is shown in the centre of the road meaning vehicles cannot cross from the southbound lane into the service station. The proposed access arrangement can be seen in Figure 6 below. If this right turn movement is not retained, it will have a significant negative impact on the operation of the service station business. A large proportion of business will be lost as southbound traffic will not be able to use the service station. The yellow box

road marking as shown appears very small to accommodate the manoeuvring movements of larger fuel delivery vehicles.

There is also no roundabout in the vicinity allowing vehicles to double back and enter the service station. This could result in vehicles making unsafe u-turns in order to access the site.

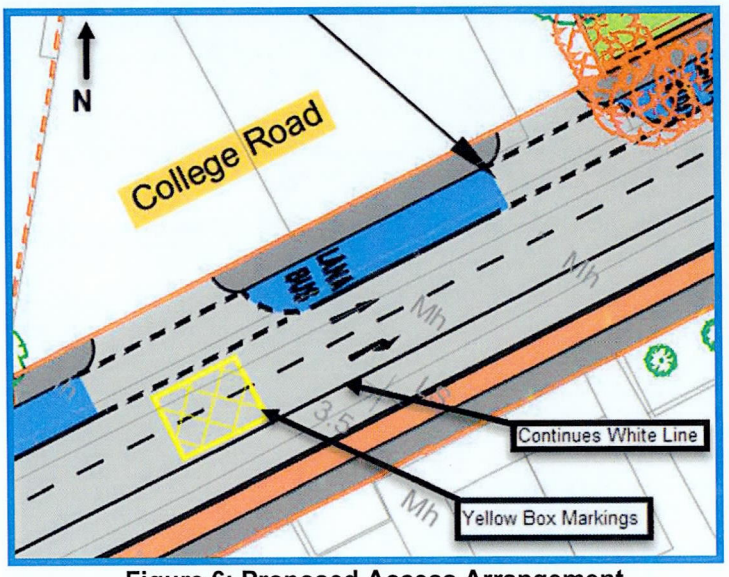

Figure 6: Proposed Access Arrangement

4.2 Justification for Right Turn Lane Requirement

There is currently a 120m length right turn storage lane provided for vehicles travelling north along College Road, turning right onto the R338 Old Dublin Road. It is proposed to extend this storage lane length to 160m in the proposed design. It is queried whether this extent of a right turn lane length is required from a traffic queuing perspective. Traffic modelling of the proposed junction would reveal the extent of right turn lane required. The traffic modelling should take into account a modal shift from private car use to more sustainable transport modes, as is the goal of this project. It is curious that an expected increase in road traffic flows is assumed by the Designer, as is implied by the extension of the right turn lane length. The proposed design should be carried out in line with the design hierarchy outlined in DMURS. This hierarchy can be seen in Figure 7 and states that private motor vehicles should be catered for last below all other travel modes. Traffic modelling with an expected modal shift to more sustainable travel modes following implementation of the scheme may inform that the right turn lane could be shortened. This could in turn mean that the extent of land take from the Circle K service station could be reduced. We urge the design team to verify that this extent of right turn lane length is indeed required. It is normal practice on sustainable transport and active travel schemes to remove right turn lanes completely in urban areas when designing new schemes such as this one.

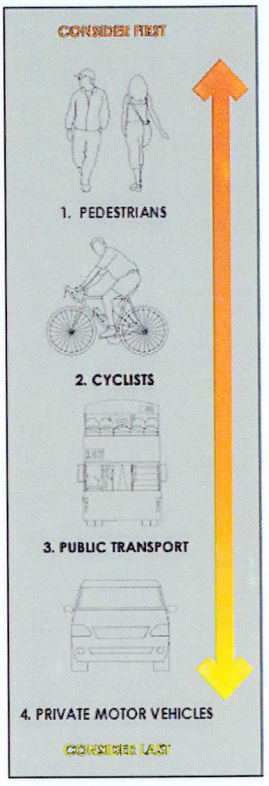

Figure 7: DMURS User Hierarchy

4.3 Loss of Parking Issues

The site currently has thirteen number car parking spaces available in the forecourt area of the service station. These spaces are vital for customers paying for fuel, using the convenience store and for staff parking. The parking is essential for the smooth operation of the business and efficient turnover of the fuel pumps. The proposed CPO will result in the loss of approximately eleven number of these spaces. There will be very little space left for customers to park safely and use the convenience store or park after refuelling. This may result in illegal parking on the street partially on footpaths on both sides with motorists having to walk accross the road to use the convenience store. This is a multifaceted safety hazard for pedestrians and may lead to traffic congestion for vehicles trying to avoid the parked/queuing cars within the station and avoid pedestrians or cyclists using the premises. This loss of parking could have a very detrimental impact on the business as clients would be lost due to the lack of parking in the vicinity of the service station. The facility would no longer be an attractive location for customers.

4.4 Road Safety Issues

- **Lack of Tactile Paving Across Entrance**

There is no tactile paving shown at the entrance junctions to the service station on the proposed general arrangement drawings. This could lead to visually impaired pedestrians crossing the entrances without being aware of the conflict with vehicles. This poses a severe safety risk to these vulnerable pedestrians. Buff coloured tactile paving slabs at least two tiles deep should be provided at both sides of each entrance.

- **Lack of Space in Forecourt**

The reduction in the area of the forecourt due to the 4.25m boundary setback will greatly reduce the open space available for vehicle and pedestrian movements within the forecourt. The lack of space will increase the conflict probability between vehicles and pedestrians attempting to navigate the forecourt, which is a serious safety concern. The reduction in formal parking areas will also exacerbate this issue. Cars are likely to park in unsuitable areas reducing the visibility of pedestrians by drivers and increasing the likelihood of a collision. The lack of space will be even further apparent during fuel delivery periods. There will be insufficient space for the tanker to navigate in and out of service station safely. The proposed CPO could render the entire service station unsafe to operate as well as rendering it unviable as a profitable business operation.

- **Right Turning Vehicles Crossing Three Lanes of Traffic**

In the current situation vehicles turning right from College Road into the service station must cross two traffic lanes to enter the forecourt. However, in the proposed layout they will also have to cross the proposed bus/cycle lane, ie. cross essentially three lanes of opposing traffic to enter the forecourt. The proposed bus lane will be used frequently by a number of bus routes according to the Draft Galway BusConnects route map. It is proposed that the bus lane will be utilised by the following routes, No. 1 Parkmore – Gateway (15 minute frequency), No. 4 Merlin Park Hospital – Gateway (30 minute frequency), No. 9 Parkmore – W. Distributor (10 Minute Frequency) and the No. 10 Oranmore – Taylor's Hill (15 minute frequency). This equates to 16 buses using the route every hour, or just over one bus every 4 minutes, as well

as cyclists. If there is queuing in the two northbound traffic lanes, in particular HGVs, the view of the bus lane may be blocked for right turning traffic. This is a serious safety concern and could lead to collisions between vehicles using the service station and buses travelling along the bus lane especially considering the frequency of the bus service along the route. There is also a significant hazard for cyclists using the proposed bus lane, not being visible to right turning traffic, as they cycle along the bus lane, hidden behind high sided queuing vehicles in the traffic lanes.

4.5 Loss of Existing Infrastructure Issues for Business Viability

The Circle K Service Station currently has significant infrastructure located within the 211.5m^2 to be permanently acquired as part of the BusConnects Scheme. This infrastructure will be lost and will have to be relocated if the scheme is to go ahead in its current form. The infrastructure to be removed includes two underground fuel storage tanks, two of the four existing fuel pumps, the existing canopy over the forecourt, the existing display signage, underground fuel pipes and underground storm network pipes. The reduction of the fuelling locations by 50% will have major implications for the operation of the business. The fuelling capacity will be incapable of keeping up with the demand and will lead to queuing in the forecourt which is already lacking space. This queuing could extend onto the road and could block the bus lane causing delays and congestion on the network. There is also no space on site to relocate the effected pumping stations and thus the capacity of the service station is greatly reduced.

4.6 Closure of the Business During Construction Stage

It is proposed to temporarily acquire the entire site during the construction stage. The reason for this is due to the fact that the fuel tanks and pipework, carrying large quantities of flammable substances would be too close to construction activity under Safety & Health legislation (publication APEA, 2011). It is predicted by the Designers that this phase of the works, from Lough Atalia Road junction to Moneenageisha junction would be 20 weeks (ref. EIAR). This might even be very ambitious and optimistic as the works may endure for a longer period. The closure of the service station will have a significant negative impact on the business in both the short and long term. The closure of the site will result in the diversion of trade to other businesses in the locality and some of these customers may never return.

5. Conclusion

It is our opinion that the scheme design presented will have major negative impacts on our client's business both during the construction phase and operationally more long term. While our client realises the importance of sustainable travel schemes such as this one and the associated benefits for the greater community, they believe the proposed design will have a number of significant negative impacts on the operation of the business. The main arguments expressed by our client are as follows:

- It is not clear if vehicles will be allowed to turn right into the service station as they currently do, following the completion of the scheme.

- The proposed right turn lane in front of the service station seems to be excessively long and it is unclear if this length of storage lane is necessary. Detailed traffic modelling with modal shift adjustments may demonstrate that the length of the lane required could be reduced and thus reduce the land take required.

- The proposed land take will result in a significant loss of parking at the site which may lead to customers parking illegally and blocking the forecourt or carriageway.

- The permanent land take will greatly reduce the amount of open space available in the forecourt which presents a serious safety hazard in an area which is shared by both pedestrians and vehicles.

- Right turning vehicles into the site must now cross three lanes of opposing traffic and a footpath to access the site. This could lead to collisions between buses and traffic if visibility is impaired and between traffic and cyclists.

- The proposed permanent land take will result in the loss of significant infrastructure which is integral to the operation to the business. The infrastructure to be removed includes two underground fuel storage tanks, two of the four existing pumps, the existing canopy over the forecourt, the existing display signage, underground fuel pipes and underground storm network pipes.

- It is proposed to temporarily acquire the entire site during the construction phase and therefore force a business closure. It may be difficult to recover this business post construction. A completely reconfigured site layout would be required, including reconfiguration of the building footprint.

APPENDIX 3: MCARDLE DOYLE CONSULTING ENGINEERS RESPONSE

McArdle Doyle

Chartered Engineers
Architectural Services
& Project Managers

Observation on Strategic Infrastructure Development
ABP Ref: 311682-21
BusConnects Cross City Link (University Road to Dublin Road) Scheme and Associated Compulsory Purchase Order Application

Circle K, College Road Service Station

College Road

Galway.

McArdle Doyle Ltd
Second Floor, Exchange Building

mail@mcardledoyle.ie
+353(0) 42 942 9052

CONTENTS

1 Introduction.

Circle K, College Road Service Station is located on College Road (R339), Galway. The service station comprises of Four (4) fuel dispensing islands covered with a typical forecourt canopy, six (6) underground fuel storage tanks, two car wash units and retail facility building with convenience store. The service station has existed and traded in its current format for approximately 30 years. This report will set out the rationale behind our clients objection to take possession of lands on a permanent basis and temporary basis under ABP Ref: 311682-21 and CPO Order 14-09-2022.

2 Regulatory Instrument.

Fuel service stations are designed, operated and maintained under S.I. No 630 of 2019, Dangerous Substances (Flammable Liquids and Fuels Retail Stores) Regulations 2019.

In order to trade all Service Stations must possess a Licence to Store Flammable Fuels under the above regulations.

3 Objection to Permanent Land Take.

The permanent land take proposed under CPO Order Map 14-09-2022 will take approximately 4.25m off the entire site frontage with College Road. This land take will have considerable negative impact on the site as outlined below.

1) Removal of two Forecourt Fuel Dispensers.
   The two roadside fuel dispensers 'numbered 3 & 4 on enclosed drawing P2308.SK.002', are currently located 4.25m off the College Road boundary. Under the Dangerous Substances Act all fuel dispensers must be located a minimum of 4.25m off a site boundary to ensure that the fuel dispensers hazardous (Explosive Vapour) zone is located within the site boundaries. The permanent land take will have the effect of removing the two road side pumps from the site. The site is too small and forecourt too confined to safely relocate these two fuel dispensers within the revised site boundary. The result of reducing the service station from four fuel dispensers to two fuel dispensers will reduce the service stations vehicle fueling capacity by 50%. The result of forcing the sites current fuel sales through two fuel dispensers as opposed to the current configuration of four fuel dispensers will cause significant increased traffic congestion resulting in fueling vehicles queuing back onto college road. *Reference Point 3, on accompanying Dr No P2308.SK.002*

   The resultant traffic congestion will cause an unacceptable traffic hazzard by generating queuing traffic onto College Road creating conflict and delay to both car vehicles and the proposed Bus Traffic which BusConnects is designed to improve.

2) The site currently has 13 number car parking spaces. The proposed CPO will result in the loss of 11 car parking spaces resulting the revised site containing 2 car parking spaces. This level of car parking is entirely inappropriate to serve a convenience store offer that currently exists on site. The lack of available car parking will result in uncontrolled parking both on site with the risk of uncontrolled parking off site. The result of the significant reduced parking will compound the issues raised in Point 1, namely that the reduced car fueling capacity of the site being reduced by 50% together with reduced and uncontrolled parking with cause significant congestion within the site to create vehicle queuing off the site and onto College Road blocking the proposed Bus Lane.

   The resultant traffic congestion created through reduced fueling locations and reduced site car parling will generate an unacceptable traffic hazzard by generating queuing traffic onto College Road creating conflict and delay to both car vehicles and the proposed Bus Traffic which BusConnects is designed to improve.

3) Impact on existing Underground Fuel Storage Tank.
   The current location of underground fuel storage tank 6 (20,000lt fuel capacity) is approximately 6.70m from the existing site boundary. The existing 4.25m hazardous zone around the access chamber of Tank 6 is located within the confines of the current site footprint. Relocating the College Road Boundary 4.25m from its current location will have the effect of making the Tank 6 hazardous zone encroach onto what will now become a public footpath. As the hazardous zone of an underground fuel tank cannot extend beyond the site boundary, Tank 6 (20,000lt capacity) will require decommissioning and removal from site. *Reference Point 6, on accompanying Dr No P2308.SK.002*

   Removal of Tank 6 (20,000lt) capacity will reduce the site fuel storage capacity by 20% thus creating additional fuel tanker deliveries to the site.

4) Impact on Tanker Deliveries.
   The Fuel Tanker Deliveries currently, occur by offloading to the underground fuel tanks located to the South of the site. To comply with the Dangerous Substances Regulations a tanker must be parked during offloading operations entirely within the site boundary and positioned on a 15m x 5m impervious slab capable of draining and containing a fuel spill discharge of 2,000lt/min to a total volume of 7,600.00lt. The result of the 4.25m boundary relocation will result in the rear 2.0m of the tanker being located on what will be a public footpath. *Reference Point 5, on accompanying Dr No P2308.SK.002*

   As a result of the permanent land take boundary relocation the site fuel tanker will be positioned partially on the new public footpath and outside the site contaminated fuel drainage system creating an unacceptable non-compliance with the Dangerous Substances Regulations in relation to both public safety and Environmental protection.

5) Impact on Underground Fuel Pipework Infrastructure.
The site utilises a fuel pressure pipe system. Fuel is pumped from submersible pumps located at the base of the fuel tanks through a continuous pipe serving each fuel dispenser. Each dispenser is served by the same 50mm internal diameter underground fuel pipe with one fuel pipe for each fuel grade. The fuel pipes loop around the outer roadside dispensers which must be removed as part of the permanent land take. As a result of the permanent land take the existing site fuel pipes will now be located under the public footpath. Under the Dangerous Substances Regulations all fuel infrastructure must be located within the site boundary. *Reference Point 7, on accompanying Dr No P2308.SK.002*

As a result of the permanent land take the existing fuel pipework will be located outside the new site boundary. This non-compliance with the Dangerous Substance Regulations created as a result of the permanent CPO land take will require the entire site fuel infrastructure to be decommissioned, removed and replaced. It is not possible to modify a pressure fuel system without replacing the fuel pipework infrastructure in its entirety.

6) Forecourt Canopy.
The existing forecourt canopy offering rain cover to fuel customers is supported by six columns located at each of the four fuel dispensers and the final two columns forming part of the service station building structure and Fabric. The current footprint of the forecourt canopy extends up to the existing site boundary. The required removal of the two roadside fuel dispensers will necessitate the demolition and removal of the entire forecourt canopy as the current canopy is structurally dependant on the six stanchions. *Reference Point 4, on accompanying Dr No P2308.SK.002*

As a result of the permanent land take the entire forecourt canopy will require demolition and replacement. As the forecourt canopy and service station building are structurally interdependent, removal of the forecourt canopy will create significant structural impacts on the service station building.

7) Forecourt Stormwater and Contaminated Stormwater drainage.
The existing stormwater and contaminated stormwater system main drainage lines are routed through the proposed CPO permanent land take. Under the Dangerous Substances Regulations all contaminated Stormwater generated from the Service Station Forecourt and Tanker offloading area must drain though a 10,000lt Class 1 Interceptor located within the service station boundary. As a result of the permanent land take the main stormwater and Contaminated Stormwater main drainage lines will be *located* outside the site under the proposed footpath created as a result of the BusConnects project. *Reference Point 8, on accompanying Dr No P2308.SK.002*

As a result of the Permanent land take the service station stormwater and Contaminated stormwater systems are outside the service station site boundaries. This Dangerous Substances non-compliance created as a result of the BusConnects CPO can only be rectified by demolishing and reinstalling the entire Stormwater and Contaminated Stormwater system to include replacement of the current site Fuel Interceptor.

4 Objection to Temporary Land Take.

The temporary land take under CPO Order Map 14-09-2022 shows the entire facility being occupied as part of BusConnects Construction works. Our Client objects to the Temporary land take as follows.

1) Tank Decommission.
   No indication has been offered on how long the lands will be occupied as part of the temporary land take. Under the Dangerous Substances Act underground fuel storage tanks may be temporarily decommissioned and then brought back into service as part of a service station refurbishment works or maintenance requirements. The period of temporary decommission is at the discretion of the local Fire Authority but typically does not extend beyond 3 months. Assuming the temporary land take will force the facility to close for a period in excess of 3 months and considerably longer we anticipate that the existing underground fuel storage tanks will require permanent decommission, removal from site and replacement with new tanks at the end of the temporary land take CPO period.

   It is reasonable to assume that the temporary land take will accommodate building contractor activity, material storage and potential contractor staff welfare facilities for BusConnects Construction. It is reasonable to state that any Health and Safety Risk assessment of this activity would necessitate the removal of fuel explosive hazardous zones. As a result, the underground fuel storage tanks will require permanent decommission, removal from site and replacement with new tanks at the end of the temporary land take CPO period.

   Our Client objects to the fact that the fuel tanks will require permanent decommission and replacement as part of the BusConnects temporary land take.

5 Conclusion.

Our Client respectfully objects to the BusConnects permanent and temporary land take proposed in this CPO due to the following technical and regulatory reasons.

1) The removal of two roadside fuel dispensers will reduce the site from 4 fuel dispensers to 2 fuel dispensers.
   - This will fundamentally damage the existing commercial performance of the site.
   - Reducing the site to 2 (two) functioning fuel dispensers will create traffic congestion forcing vehicles to queue back out onto College Road causing unacceptable Road Safety issues for both vehicles wishing to use the facility and for Bus Traffic which the BusConnects project is designed to prevent.
2) Removal of 11 car parking spaces from the site.
   - This will generate unacceptable parking patterns on site.
   - Generate uncontrolled parking both on and off site.
   - Increased traffic congestion on site will force vehicles to queue back out onto College Road.
3) Underground Tank Removal.
   - To ensure ongoing compliance with the current Dangerous Substances Regulations, 1 (one) 20,000lt underground tank will be removed from site. This storage capacity reduction will generate additional fuel tanker deliveries to site addressed in the following point.

4) Fuel Tanker Deliveries.
    - The revised site boundary, 4.25m into the site will result in Tankers partially being positioned onto the proposed footpath creating a noncompliance with the Dangerous Substances act.
    - Potential spill containment required within and under a parked fuel tanker cannot be achieved creating a noncompliance with the Dangerous Substances Act.
5) Existing Underground Fuel Pipework.
    - Existing underground fuel pipework will be located under the proposed public footpath as a result of relocating the site boundary 4.25m into the site. Underground fuel pipework cannot be located outside the perimeter of the site creating a noncompliance with the Dangerous Substances Act.
6) Forecourt Canopy.
    - Relocation of the site boundary and removal of two fuel dispensers will require full demolition of the current forecourt canopy and construction of a new canopy.
7) Service Station Drainage.
    - The proposed BusConnects permanent land take will require full removal and replacement of the site Stormwater and Contaminated Stormwater Drainage systems.
8) Temporary land take impact.
    - In our opinion the temporary land take will exist for a period considerably beyond 3 months and it is therefore reasonable to assume that a temporary underground fuel tank decommission will not be appropriate. This would require the existing underground fuel storage tanks being permanently decommissioned and then replaced at the end of the temporary CPO period.
    - Health and Safety considerations relating to site construction activity within the temporary land take area will necessitate permanent fuel tank decommission and ultimately tank replacement at the end of the temporary CPO period.

The overall effect of the above will be.

- The permanent removal of two service station fuel dispensers, 4 out of 8 fueling points will be lost.
- The facility fuel tanker will be partially parked on the public footpath during offloading operations.
- Demolition and removal of the forecourt canopy.
- Potential substantial structural remedial works to the service station building as a result of the canopy removal.
- Replacement of the entire underground fuel pipework infrastructure system. It is not possible to partially replace pressure fuel pipework.
- Decommission and replacement of the underground fuel tanks.
- Replacement of the stormwater and Contaminated Stormwater drainage systems.
- Relocation of the tanker off loading position to ensure the tanker can off load within the site boundary.
- Replacement of all site hard surfaces as a result of the above.

It is our opinion that the compounding effects of all of the direct impacts on the Service Station site will ultimately **result in a full demolition and rebuild of the service station on BusConnects completion**. The rebuilt service station will be smaller in scale as the overall site area will reduce by 205sqm from the existing site area of 1,665sq.m (a 12.5% site area reduction) with significantly less fuel dispensing capacity.

It is our opinion that reducing the fuel dispensing capacity of the site will generate unacceptable and potentially unsafe traffic queuing beyond the site and onto the proposed BusConnect lane creating new traffic congestion issues that BusConnects has been designed to remove from College Road.

This report has been prepared without prejudice and excludes the temporary or permanent commercial damage to the service station.

Report by

Ronnie McArdle BEng, CEng, MIEI
McArdle Doyle Limited.
03rd July 2022

PROPOSED BUS CONNECTS LAND TAKE

ITEM	LEGENDS	DESCRIPTION OF WORKS
1		EXISTING SITE BOUNDARY
2		PERMANENT LAND TAKE UNDER CPO-14-09-2022
3		2 NUMBER FUEL DISPENSERS TO BE REMOVED AS PART OF THE PERMANENT LAND TAKE
4		FORECOURT CANOPY TO BE REMOVED DUE TO BUS CONNECT WORKS
5		INDICATES FUEL TANKER OFFLOADING POINT ENCROACHING ONTO PROPOSED PUBLIC FOOTPATH. CREATED AS PART OF BUS CONNECTS WORKS
6		TANK 6 TO BE DECOMMISSIONED & REMOVED FROM SITE AS HAZARDOUS ZONE WILL ENCROACH ONTO PUBLIC FOOTPATH. CREATED AS PART OF BUS CONNECTS WORKS
7		UNDERGROUND FUEL PIPWORK TO BE DECOMMISSIONED. REMOVED & REPLACED AS FUEL PIPEWORK MUST BE WITHIN SERVICE STATION SITE BOUNDARY.
8		SITE STORM WATER, CONTAMINATED STORM WATER & FOUL TO BE REMOVED & REPLACED WITHIN SITE BOUNDARY

NOTE:
ALL OF THE ABOVE WORKS LISTED CREATED AS PART OF BUS CONNECTS LAND TAKE

SITE AREA = 1700m²

PERMANENT LAND TAKE AREA = 212m²

– DENOTES HAZARDOUS ZONE

1 – DENOTES DISPENSER NUMBERS

Rev.	Description	By	Date
–	ISSUED FOR INFORMATION	GF	11.11.22

McArdle Doyle
Second Floor
Exchange Building
The Long Walk
Dundalk, Co. Louth

Chartered Engineers
Architectural Services
& Project Managers

mail@mcardledoyle.ie
+353(0) 42 942 9052

PROJECT:
CIRCLE K,
COLLEGE ROAD, GALWAY

CLIENT:
CIRCLE K

DRAWING TITLE:
PROPOSED BUS CONNECTS
LAND TAKE IMPACT

Date	Drawn	Checked	Approved
11/11/22	GF	RMcA	RMcA

Scale at A1	Drawing Number	Status	Rev.
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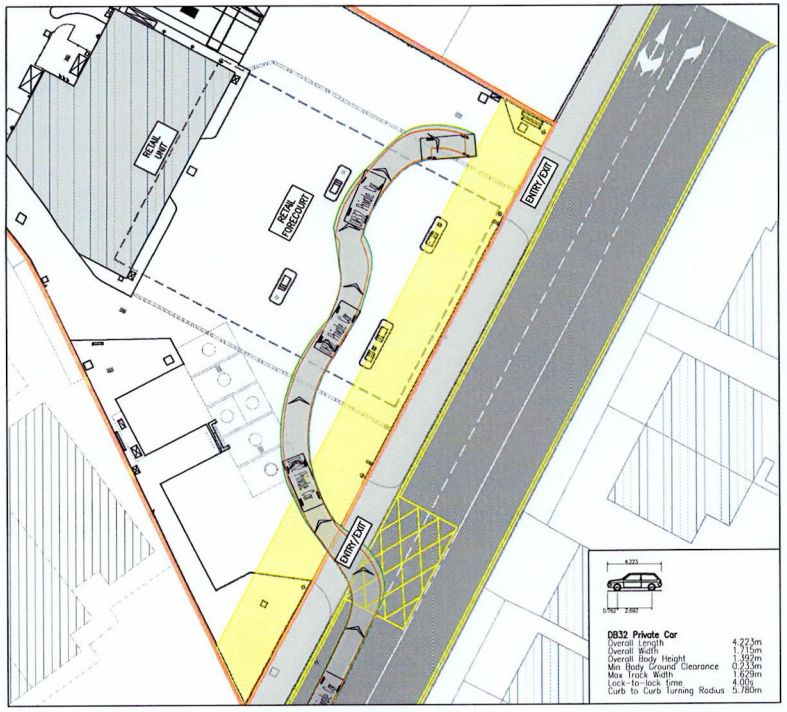

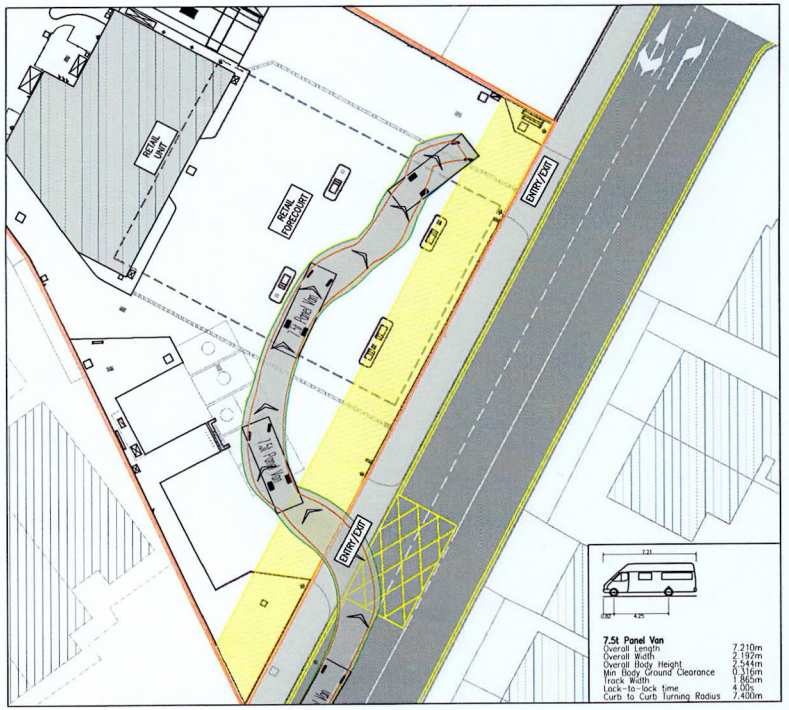

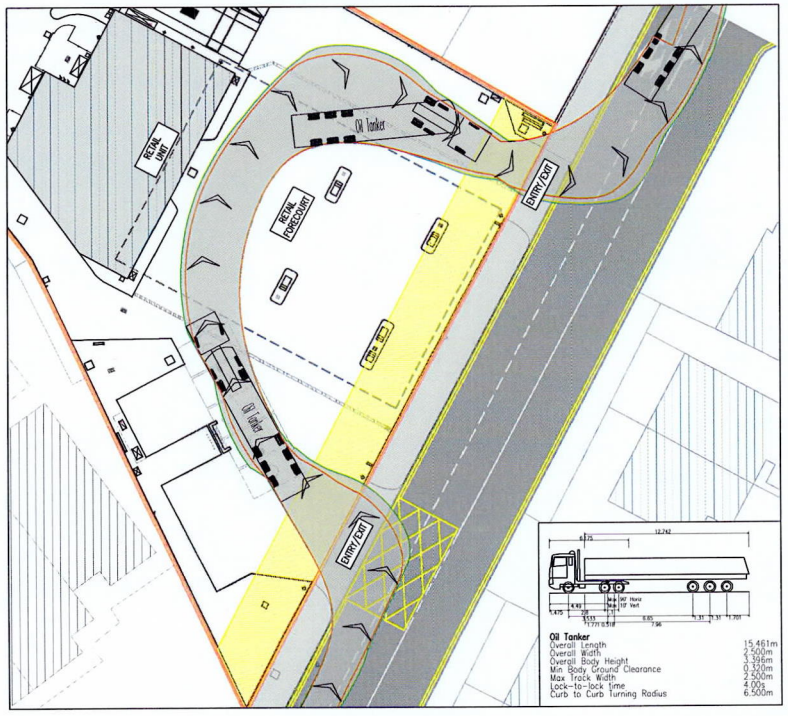

NOTES:
THIS DRAWING IN WHOLE OR IN PART SHALL NOT BE COPIED WITHOUT THE PRIOR PERMISSION OF McARDLE DOYLE LTD.

ALL WORKS TO COMPLY WITH THE CURRENT BUILDING REGULATIONS.

DO NOT SCALE.

LEGEND

SITE BOUNDARY

PROPOSED LAND TANK

Rev.	Description	By	Date
-	ISSUED FOR INFORMATION	GF	11.11.22

McArdle Doyle
Second Floor
Exchange Building
The Long Walk
Dundalk, Co. Louth

Chartered Engineers
Architectural Services
& Project Managers

mail@mcardledoyle.ie
+353(0) 42 942 9052

PROJECT:
CIRCLE K,
COLLEGE ROAD, GALWAY

CLIENT:
CIRCLE K

DRAWING TITLE:
SITE LAYOUT
AUTOTRACKS

Date	Drawn	Checked	Approved
11/11/22	GF	JF	JF

Scale at A1	Drawing Number	Status	Rev.
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