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Planning Department
South Dublin County Council
County Hall
Tallaght

Dublin 24

Land Use Planning & Transportation

2 B APR 2023

South Bublin County Council

Friday, 28<sup>th</sup> April 2023

THORNTON O'CONNOR

TOWN PLANNING

RE: RESPONSE TO REQUEST FOR FURTHER INFORMATION IN RESPECT OF A MATIONAL AMBULANCE BASE AT THE GLEN ABBEY COMPLEX, BELGARD ROAD, TALLAGHT, DUBLIN 24

South Dublin County Council Register Reference: SD22A/0424

#### 1.0 INTRODUCTION

# 1.1 Response to Request for Further Information by South Dublin County Council

This letter is submitted by Thornton O'Connor Town Planning¹ on behalf of the HSE² in response to a *Request for Further Information* issued by South Dublin County Council, dated 6<sup>th</sup> January 2023, in respect the provision of a proposed ambulance base at the Glen Abbey Complex on the Belgard Road.

This Response to the *Request for Further Information* has been prepared by Thornton O'Connor Town Planning in association with AXO Architect<sup>3</sup>, CHH Consulting Engineers<sup>4</sup>, NRB Traffic Engineers<sup>5</sup>, RSK Group Ltd<sup>6</sup> and IN2 Consulting Engineers<sup>7</sup>.

#### 1.2 Documents Enclosed

# 1.2.1 Planning Cover Letter

Some 6 No. copies of this cover Letter prepared by Thornton O'Connor Town Planning, dated 26<sup>th</sup> April 2023.

<sup>&</sup>lt;sup>1</sup>No. 1 Kilmacud Road Upper, Dundrum, Dublin 14, D14EA89

<sup>2</sup> HSE Capital & Estates Office, Bridge House, Cherry Orchard Hospital, Ballyfermot, Dublin 10, D10 K03

<sup>3</sup> Ellison St, Gorteendrunagh, Castlebar, Co. Mayo, F23 TH7

<sup>4</sup> House 44, Innisfree, 45 High St, Sligo

<sup>5 1</sup>st Floor, Apollo Building, Dundrum Rd, Dundrum, Dublin 14

<sup>&</sup>lt;sup>6</sup> Bluebell Business Centre, Old Naas Road, Bluebell, Dublin 1

<sup>7</sup> Unit E+F, Mountpleasant Business Centre, Mountpleasant Avenue Upper, Dublin 6



# 1.2.2 Architectural and Landscape Drawings – Axo Architects

Some 6 No. copies of a Landscape Report

Axo Architects			
Drawing No.	Drawing Title	Scale	Size
P(01)09	Proposed Site Layout Plan	1:500	A3
L(80)01	Proposed Landscape Plan	1:300	A <sub>3</sub>
L(80)02	Proposed Landscape Details	1:100	A3
L(80)03	Proposed Landscape Details	1:100	A3
L(80)04	Proposed Landscape Details	1:100	A3
L(80)05	Proposed External Ramp and Stair Entrance	1:100	A <sub>3</sub>
L(8o)o6	Proposed Planting Plan	1:300	A <sub>3</sub>
L(80)07	Proposed Site Boundary Treatment	1:200	A3
L(8o)o8	Proposed Site Boundary Treatment	1:200	A <sub>3</sub>

# 1.2.3 Transport Documents – NRB Consulting Engineers

- Some 6 No. copies of a Cover Letter dated 12<sup>th</sup> April 2023.
- Some 6 No. copies of the following drawings:

NRB Traffic Engineers			
Drawing No.	Drawing Title	Scale	Size
NRB-RFI-001	Proposed Development Access Details	1:200	A3
NRB-RFI-002	Autotracks of a Fire Tender Entering & Exiting the Proposed Development	1:500	A3
NRB-RFI-03	Autotracks of an Ambulance Entering & Exiting to Proposed Development	1:500	A3
NRB-RFI-004	Autotracks of Ambulances at Various Bays 1 of 2	1:250	A3
NRB-RFI-005	Autotracks of Ambulances at Various Bays 1 of 2	1:250	A3
NRB-RFI-006	Autotracks of an Ambulance at Proposed Garage	1:250	A <sub>3</sub>

# 1.2.4 M&E Drawings- IN2

Some 6 No. copies of the following drawings prepared by  ${\tt 1N2}:$ 

IN2 Consulting Engineers			
Drawing No.	Drawing Title	Scale	Size
A2104-IN2-01- ZZ-DR-M-0301	Mechanical Services Installation Site Layout Water Harvesting Services Layout	1:200	A1
A2104-IN2-01- ZZ-DR-M-0301	Mechanical Services Installation Site Layout Air Source Heatpump Services Layout	1:200	A1



# 1.2.5 CHH Civil & Structural Consulting Engineers

- Some 6 No. copies of a Report entitled Civil/Structural Report Planning.
- Some 6 No. copies of the following drawing:

Drawing No.	Drawing Title	Scale	Size
20-082-C-02	Proposed Drainage & Waterm	1:200	A1
	Layout	L <u> </u>	

# 1.2.6 RSK Noise Consultants

• Some 6 No. copies of a Letter entitled Response to RFI Item No. 1, dated 1<sup>st</sup> March 2023.



# 2.0 RESPONSE TO FURTHER INFORMATION REQUEST

The Planning Authority set out the following:

# 2.1 Item No. 1: Noise Impact

Item No. 1 states:

'The Planning Authority is not satisfied with the applicants conclusion that the nature of the proposed use precludes any requirement for an assessment of potential noise impact from the ambulance sirens. In the interest of the proper planning and sustainable development of any area it is critical to ensure that uses are not permitted that might conflict with existing and permitted uses in any given area. In this regard, the applicant is requested to submit a noise impact assessment for the operation of the facility, specifically assessing the likely noise associated with traffic movements throughout the day and night at the site. It should be clarified at what point/location will sirens be switched on when existing the site'.

# 2.1.1 Response to Item No. 1

Please see enclosed a Report prepared by RSK Acoustic Engineers which addresses this matter.

In summary, the Report states that additional enquiries have been made to the National Ambulance Service's Office of the Director of Operations, who have provided the following additional information (received via email of 2nd February) from William Merriman (Director of Operations):

"We would not expect to see an increase on Siren useage from this location than what is already happening on the Belgard Road. Any Emergency Ambulance operated by NAS now has a pre-shift check at the beginning of each shift and this operates in silent mode where sirens are checked prior to going on duty, this allows they staff to check that sirens are working but can only be heard within the vehicle, so no noise from crews carrying out pre shift checks. It is also expected that the majority of crews would be relocated from this location during their shift to deployment points around Dublin which will not require vehicles at all times exiting the premises on Blue lights and sirens".

Additional comments received from the Chief Assistant Technical Services Officer at the HSE Capital & Estates Office (received via email of 2nd February), state as follows:

"...the new Glen Abbey Ambulance Station would be a 'Hub' Location for 'Dynamic Deployment'. Essentially NAs have a number of smaller deployment points based throughout South Dublin Co Co and Dublin City (such as Ballyboden Primary Care) and at the start of a shift the ambulance crew would drive from Glen Abbey (the Hub) to the Dynamic Deployment location wait there to receive an emergency call and respond to the call from the dynamic deployment location. This is a different model to say Dublin Fire Brigade which deploy from the Fire Station. So the vehicle generally only returns back to the hub location at the end of their shift so there would in fact be very little 'blue light' response calls deployed from the Glen Abbey station itself".



It is confirmed that the dynamic deployment locations are as follows:

- Coolock;
- Summerhill;
- Ballinteer;
- Cherry Orchard; and;
- Finglas.

It is also noted that there are Regulations that permit the use of emergency sirens, under necessary circumstances, i.e. S.I. No. 694/2011 - Road Traffic (Requirement to have Audible Warning Devices on Vehicles) Regulations 2011, which state:

'A vehicle may be fitted with a bell, gong, siren or other strident-toned device where the vehicle is to be used—

- (a) by a member of the Garda Síochána in the performance of his or her duties,
- (b) as a fire brigade vehicle,
- (c) by persons providing an ambulance service,
- (d) by the Irish Prison Service,
- (e) as an Irish Coast Guard vehicle, with or without a trailer, or,
- (f) for the delivery or collection of human transplant organs, human blood or human blood products,
- (q) as a Marked Military Police Vehicle
- (4) When a vehicle referred to in sub-article (3) is being used for one of the purposes specified in that sub-article the bell, gong, siren or other strident toned device may be sounded only—
- (a) if necessary in the circumstances

[Emphasis Added]

In summary therefore, it is the RSK opinion that, due to the critical nature of the services offered by emergency vehicles, assessing the potential noise impact of necessary siren use is not appropriate.

However, additional correspondence and information received from the National Ambulance Service Office and the HSE Capital & Estates Office has confirmed the following:

- An increase in siren usage, in comparison to the current site operation at the Glen Abbey National Ambulance Base, is not expected;
- All pre-shift siren checks will operate in silent mode (i.e. where sirens can only be heard within the vehicle) prior to vehicles going on duty;
- The new Glen Abbey National Ambulance Base will act as a 'Hub' Location for 'Dynamic Deployment'. The majority of ambulance crews will therefore be relocated from the 'Hub' to smaller deployment points around Dublin at the start of their shift.
- These deployments will not require ambulance vehicles exiting the premises with sirens operational.
- Ambulance vehicles generally only return back to the 'Hub' at the end of their shift.
   Therefore, there will be limited, if any, 'blue light' response calls deployed from the Glen Abbey National Ambulance Base station.



#### 2.2 Item No. 2: Roads and Access

'The applicant is requested to submit the following:

a. A revised layout which clearly indicates where the vehicular access point is proposed. Entrance detail must identify:

i. whether there are any changes to the existing arrangement

ii. all relevant dimensions (entrance width)

iii. details of any gates (sliding, automated, additional pedestrian gate?, etc)

iv. any shared surfaces

v. road markings and signage

vi. visibility splays

- b. A revised layout which shows safe access to all ambulance spaces, accompanied by AutoTRAK analysis displaying how turning manoeuvres can be carried out safely to all spaces (Minimum reversing clearance behind perpendicular parking spaces must be proportional to vehicle size).
- c. A rationale explaining the reasoning for the proposed number of staff parking spaces (based on number of staff/drivers), with reference to the maximum parking rates allowable per Chapter 12 of the Development Plan.
- d. A revised layout showing in greater detail the proposed two-bay ambulance garage with AutoTRAK analysis showing safe access/egress'.

#### 2.2.1 The Applicant's Response

Please see enclosed a detailed response by NRB Consulting Engineers.

# 2.3 Item No. 3: Landscaping

Item No. 3 states:

There are concerns with the lack of information submitted in relation to the landscape scheme for the proposed development. The applicant is requested to provide detailed landscape design for the proposed development. The applicant shall provide a fully detailed landscape plan with full works specification, that accords with the specifications and requirements of the Council's Public Realm Section. The applicant shall provide the following additional information:

- i. The applicant shall submit a comprehensive Landscape Design Rationale, the objective of this report is to describe the proposed landscape and external works as part of this proposed housing development.
- ii. The applicant is requested to submit a fully detailed Planting Plan to accompany the landscape proposals for the entire development. The applicant should propose native species where possible to encourage biodiversity and support pollinators within the landscape.



iii. The landscape Plan shall include hard and soft landscape details; including levels, sections and elevations, detailed design of SUDs features including swales and integrated/bio-retention tree pits.

- iv. Significantly reduce the impacts of the development on existing green infrastructure within and adjacent to the proposed development site.
- v. Demonstrate how natural SUDS features can be incorporated into the design of the proposed Development.
- vi. Submit green infrastructure proposals and a green infrastructure plan that will mitigate and compensate for the impact of the proposed development on this existing site and show connections to the wider GI Network. These proposals should include additional landscaping, SUDS measures (such as permeable paving, green roofs, filtration planting, above ground attenuation ponds etc) and planting for carbon sequestration and pollination to support the local Bat population.

vii. The applicant is requested to submit elevation drawings specifying the proposed boundary treatment for the subject site.

### 2.3.1 The Applicant's Response

Please see enclosed Landscape drawings and a Report by Axo Architects detailing the proposed landscaping and SUDS measures proposed.

The boundary treatments are also detailed on the Axo drawings.

#### 2.4 Item No. 4: Sustainable Drainage Systems

Item No. 4 states:

- a. The applicant should demonstrate compliance with the SDCC SUDS Design Guide 2022, and Policies GI3, GI4, GI5, IE3, SM2, SM7, and sections 4.3.1, 12.7.6, 12.11.1, and 12.11.3. of the South Dublin County Development Plan 2022 2028 in relation to sustainable drainage systems.
- b. In relation to SUDs, the applicant is requested to submit plans showing how surface water shall be attenuated to greenfield run off rates and showing what SuDS (Sustainable Drainage Systems) are proposed.
- c. SUDs Management The applicant is requested to submit a comprehensive SUDS Management Plan to demonstrate that the proposed SUDS features have reduced the rate of run off into the existing surface water drainage network. A maintenance plan should also be included as a demonstration of how the system will function following implementation.
- d. Natural SUDS features should be incorporated into the proposed drainage system for the development such as bio-retention/constructed tree pits, permeable paving, green roofs, filtration planting, filter strip etc. In addition, the applicant should demonstrate how the proposed natural SUDS features will be incorporated and work within the drainage design



for the proposed development. The applicant is requested to refer to the recently published 'SDCC Sustainable Drainage Explanatory, Design and Evaluation Guide 2022' for acceptable SUDS tree pit details.

e. The applicant is requested to submit a report to show surface water attenuation calculations for proposed development. Show on a report and drawing what surface water attenuation capacity each SuDS (Sustainable Drainage System) system has in m3. Show in report what surface water attenuation capacity is required for proposed development. Show what different surface types, areas in m2 are proposed such as, green roofs, permeable paving, buildings, roads and their respective run off coefficients. Submit a drawing showing the treatment train of SuDS and proposed natural flow controls for each SuDS system.

# 2.4.1 The Applicant's Response

Please see enclosed a package of information from CHH Consulting Engineers including: a Civil/Structural Planning Report and a *Proposed Drainage and Watermain Layout* drawing.

In summary, It is proposed that the surface water is collected from both the existing building and the new development using two distinct and separate systems.

The roof areas to both the existing building and the new structures are to be collected and drained to a rainwater harvesting storage system located at the South West area of the Site.

The hardstand ground level areas will be split up into 3 separate Zones.

Zone A = North front facing carpark and Extg and proposed roof)

Zone B = East facing carpark and access road.

Zone C = South Power washing area and access pavement.

#### Zone A:

The storm water from Zone A will be drained via standard gully traps and passed through a Petrol interceptor before draining into the proposed rainwater harvesting system. This main storm line will also pick all roof rain water pipes.

#### Zone B:

The storm water from Zone B will drain over its surface and directed into a proposed Bio-Retention Garden in accordance with SDCC Sustainable Drainage Explanatory Design & Evaluation Guide.

#### Zone C:

The storm water from Zone C including the waste water from the power washing station will be directed through a petrol interceptor before draining to the recycling system of the power washing station where recycling of the used power station water will occur before being reused.

An overflow will be placed on the Rainwater Harvesting System. This overflow will be drained to the Bio-Retention garden. The rainwater harvesting storage will include a backup mains feed where dry weather spells are expected.



The Bio-Retention garden is to be constructed in accordance with SDCC Sustainable Drainage Explanatory Design & Evaluation Guide. Where saturation of the garden may occur in heavy rainfall situation a flow control device has been specified to restrict outflow to 2l/s from the garden to thereby alleviate pressure on the public storm system.

# 2.5 Item No. 5: Green Infrastructure

Item No. 5 states:

'The applicant is requested to provide additional information as follows and in accordance with the quoted policies and sections of the South Dublin County Development Plan 2022 – 2028

a. To demonstrate how they intend to reduce fragmentation of existing green infrastructure. The applicant should provide a green infrastructure plan showing connections through the site and connections to wider GI network'.

# 2.5.1 The Applicant's Response

Please see enclosed the Landscape Drawings and Report by Axo Architects.

### 2.6 Item No. 6: Surface Water and Suds

Item No. 6 states:

'There is no report showing surface water attenuation calculations for proposed development. The applicant is requested to submit the following:

- a. A report showing surface water attenuation calculations for proposed development. Include site area and areas of different surface types in m2. Show what attenuation is provided and what is required in m3.
- b. It is unclear what if any SuDS (Sustainable Drainage Systems) are proposed for the development. Submit a report and drawing showing what SuDS are proposed. Examples of SuDS include, Swales, permeable paving, green area detention basins or other such SuDS.

The applicant is advised to contact Water Services in South Dublin County Council prior to the submission of above reports and drawings to discuss same'.

### 2.6.1 The Applicant's Response

Please see enclosed the information from CHH Consulting Engineers.



#### 2.7 Item No. 7: Aviation

Item No. 7 states:

'The applicant is requested to consult with Casement Aerodrome/Air Corps and get their approval of the proposal regarding any potential glint and glare'.

# 2.7.1 The Applicant's Response

On behalf of the Applicant, an email was sent to the Department of Defence on 3<sup>rd</sup> March 2023 detailing the proposal and attaching the glint and glare report submitted at application stage.

The Department of Defence issued a response via email on  $13^{th}$  March 2023 stating the following in summary:

'Based on the information supplied and having consulted with our Air Corps colleagues at Casement Aerodrome, the Department of Defence wishes to confirm that The Glint and Glare Assessment provided by Macro Works is accepted by the Department of Defence.

Should negative effects become apparent on air or ATC operations at Casement Aerodrome, as a result of the photovoltaic cells, then the owner must take measures necessary to mitigate these effects to an acceptable level, without delay'.

Please see the full trail of correspondence in Appendix A.

#### 2.8 Item No. 8: District Heating

Item No. 8 states:

'The applicant is requested to investigate linking the proposed development to the District Heating System and future proofing the building in the event that HeatNet is no longer available in the future'.

#### 2.8.1 The Applicant's Response

IN2 Consulting Engineers have advised the following in this regard:

In relation to Heatnet" Project – District Heating Infrastructure Tallaght Town Centre, was investigated during the initial design strategy with contact made to South Dublin County Council on the 14<sup>th</sup>/04/2021. No response was received from SDCC on the feasibility to connect to the proposed scheme.

On further investigation it was noted that Phase 1 of the scheme was running in the opposite direction, therefore leading to a high project risk. For this reason, the option was deemed not suitable at present, but as the building is designed as Zero Carbon Building future connections and Heat Exchangers will be included in the design of the heating system to allow for the connection of the district heating system.

The proposed heating system for the building is based on heat pump technology.



Please see their response in Appendix B.

# 3.0 CONCLUSION

We trust that this submission fully addresses the *Request for Further Information* in respect of the subject development.

Please revert to us if we can be of further assistance or clarification.

We look forward to receiving an acknowledgement and subsequent Decision in respect of the above.

Yours faithfully

Patricia Thornton

Patricia Thornton Director Thornton O'Connor Town Planning



# Appendix A: Email to and from Department of Defence Regarding PV Panels on the Roof

#### Patricia Thornton

Defence Property Management Planning

Sent

<PropertyManagementPlanning@defenceie>

Wednesday 22 March 2023 16:32

Tot

Patricia Thornton

Cc

Gareth O'Flaherty (Defence): Sarah Zacharia (Defence)

Subject

HSE Planning Application Balgard Road

### Dear Ms. Thornton,

I write in response to your e-mail below and the attached documentation dated 03 March 2023 re: application by the HSE for a National Ambulanced Base at Glen Abbey, Belgard Road, Tallaght, Dublin 24.

Based on the information supplied and having consulted with our Air Corps colleagues at Casement Ascodrome, the Department of Defence wishes to confirm that The Glint and Glare Assessment provided by Macro Works is accepted by the Department of Defence.

Should negative effects become apparent on air or ATC operations at Casement Aerodrome, as a result of the photovoltaic cells, then the owner must take measures necessary to mitigate these effects to an acceptable level, without delay.

Please contact me if you have any queries.

Bestregards

Don

Don Watchern

Propeny Nanagameni Branch

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 A D93.

Station Road, New bridge, Co. Kildara, W12 AD93.

T +353 (0)45 452199 E-mail <u>domwatchorm@dafencale</u>

From: Defence Property Management Planning

Sent: Monday 13 March 2023 11:01

To: 'patricia@toctownplanning.ie' <patricia@toctownplanning.ie> Or: Gareth O'Flaherty (Defence) < Gareth O'Flaherty@defence.ie>

Subject: FW: HSE Planning Application Belgard Road

Dear Ms Thomton,

The Department of Defence wishes to acknowledge receipt of your e-mail and attached documentation. The Department are currently consulting with the Air Corps on this matter and we will revert in due course.

Please contact me if you have any queries.

Bestregards

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 $\mathbf{Dom}$ 

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Bôthar an Stàisiúin, An Droichead Nua, Contae Chill Das A. WAX & DOS.

Station Road, New bridge, Co. Kildare, WYZ ADSG.

T+355 (1),45 452139 Eisonajsb@modatswoog lism-3

From: Pairicis Thombon <a href="mailto:2010-closusplanming-is">2 Sent Monday 13 Merch 2023 10.22</a>

To: Gareth Öfflaherty (Defrace) < Gareth. OHaherty@defrace is-

Subject: FW: HSE Planning Application Belgard Road

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I'm just checking if you have had a chance to consider this email and if you are the right person to send it

Thank you very much.

sbregeA

Famera

Subject: HSE Planning Application Belgard Road Sent Friday, March 3, 2023 2.01 PM To: gareth ollsheriy@defence.is From: Patricia Thornion

Dear Mr O'Fishaty

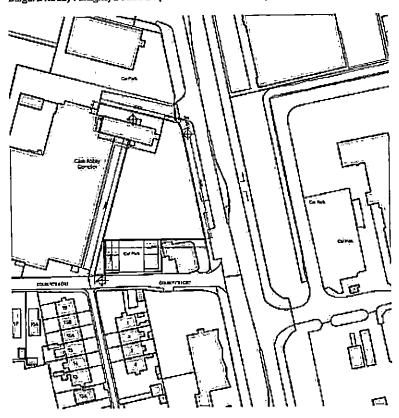
Glen Abbey, Belgard Road, Tallaght, Dublin 24 (see site location below). We lodged a planning application on behalf of the HEE for a Mational Ambulanced Base on a size called



To: gareth.oflaherty@defence.ie Subject: HSE Planning Application Belgard Road

#### Dear Mr O'Flaherty

We lodged a planning application on behalf of the HSE for a National Ambulanced Base on a site called Glan Abbey, Belgard Road, Tallaght, Dublin 24 (see site location below).



As part of the application, we are retrofitting and extending an existing building and providing PV panels on the roof.

As part of a Further Information request, we been asked the following by South Dublin County Council

The applicant is requested to consult with Casement Aerodrome/Air Corps and get their approval of the proposal regarding any potential glint and glore.

The CGI below shows the building and the extent of FV panels and I am attaching the Glint and Glare Assessment prepared by Macroworks.



Would you be able to confirm that the proposal would not cause any issue in respect of your operations?

If you require any further information, please do not he sitate to contact me.

Thank you very much.

Regards

Patricia

Patricia Thornton

Director





# THORNTON O'CONNOR

TOWN PLANNING

No. 1 Kilmacud Road Upper, Dundrum, Dublin 14, T. +353.1. 205.1490 M. 086.1004652 W. <u>www.toctownplanning.je</u>

Registered in beland 145: ५९५०४५

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Notice re Confidentiality: This e-mail and any attachment transmitted with it are confidential. They are intended solely for the use of the intended recipient and should not be read or released to any third party without the prior consent of the Department of Defence.



# Appendix B: Email from IN2 dated 29th January 2023 regarding District Heating

#### **Patricia Thornton**

From: Sent

Ciaran Duffy < ciaran.duffy@in2.ie> Thursday 19 January 2023 17:04 Joana Nunes, Michael Horan A2104 Belgard Ambulance Base

To: Subject

Joana,

See below, as per our meeting today on the above-mentioned project:

In relation to Heatnet" Project – District Heating Infrastructure Tallaght Town Centre, was investigated during the initial design strategy with contact mode to South Dublin County Council on the 14th/04/2021 . No response was received from SDCC on the feasibility to connect to the proposed scheme.

On further investigation it was noted that Phose 1 of the scheme was running in the apposite direction, therefore lending to a high project risk. For this reason, the option was deemed not suitable at present, but as the building is designed as Zero Carbon Building future connections and Heat Exchangers will be included in the design of the heating system to allow for the connection of the district heating system.

The proposed heating system for the building is based on heat pump technology.

Regards

Ciaran Duffy Senior Mechanical Engineer



Unit 11 Inich Carreig Business Centre, Golden Island, Affilone, Co. Westmeath, N37 PN82 tr+353 (0)90 649 9090 m: +353 (0)87 056 9056









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