

## Energy Statement

Proposed Residential Development at Ballyoulster,<br>Celbridge, Co. Kildare

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## Comments

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## 1. Introduction

This Energy Statement has been prepared by Waterman Moylan as part of the planning documentation for a proposed residential development at Ballyoulster, Celbridge, Co. Kildare

The proposed development comprises a Strategic Housing Development of 344 no. residential units (comprising 54 no. 1 beds, 30 no. 2 beds, 210 no. 3 beds and 50 no. 4 beds), a childcare facility with a GFA of c. 369 sq.m, public and communal open space, landscaping, car and cycle parking spaces, provision of an access road from Dublin Road and Shinkeen Road, associated vehicular accesses, internal roads, pedestrian and cycle paths, bin storage, ESB substations, pumping station and all associated site and infrastructural works.

This report identifies the energy standards with which the proposed development will have to comply and also sets out the overall strategy that will be adopted to achieve these energy efficiency targets. The report also details the existing and proposed utility services (ESB, Gas \& Telecoms) and the existing microwave telecommunication channels in vicinity of the site.

The dwellings will be required to minimise overall energy use and to incorporate an adequate proportion of renewable energy in accordance with Building Regulations Part L 2021, Conservation of Energy \& Fuel (hereinafter referred to as "Part L 2021 Dwellings"). The Childcare Facility and Community Facility will be designed to meet the requirements of Building Regulations Part L 2021, Buildings Other than Dwellings (hereinafter referred to as "Part L 2021 BOTD") and has regard to the relevant policies set out in the Kildare Development Plan 2017-2023 (Section 8.10 and Policy EB1) and the Celbridge Local Area Plan 2017-2023

## 2. Building Regulations Part L 2021

Compliance with Building Regulations Part L 2011 is broken down into six distinct categories, known as Regulation 8; parts (a) to (f).

A summary of each of these parts as listed in Technical Guidance Document L 2011 is provided below together with a description of what is required to demonstrate compliance and suggested routes to meeting the required standards.

### 2.1 Regulation 8 Part (a)

The regulation requires that:
Providing that the energy performance of the building is such as to limit the calculated primary energy consumption and related carbon dioxide (CO2) to that of a nearly zero energy building within the meaning of the Directive insofar as is reasonably

Part (a) is the overarching compliance target which stipulates the required overall reduction in energy consumption and carbon emissions for new dwellings.
This requires that the energy consumption and carbon emissions of every dwelling is assessed using the DEAP software and that reductions of $70 \%$ in energy consumption and $65 \%$ in carbon emissions are achieved. The baseline against which this reduction is to be measured is considered to be a dwelling which is constructed to perfectly comply with the 2005 version of Building Regulations Part L.

The ratio of the energy consumed by the proposed dwelling to a similar dwelling constructed to 2005 energy efficiency standards is referred to as the "Energy Performance Co-efficient"

### 2.2 Regulation 8 Part (b)

The regulation requires that:
Providing that, the nearly zero or very low amount of energy required is covered to a very significant extent by energy from renewable sources, including energy from renewable sources produced onsite or nearby;
This requires that the all new dwellings are provided with a renewable energy source. The regulations state that $20 \%$ of the total energy consumed within the dwelling must be provided from renewable thermal sources (solar thermal, biomass, heat pumps) or renewable electrical sources (Photovoltaic, Micro-wind).

In practical terms, for a multiple unit development, this requirement is usually met by incorporating PV panels at roof level, incorporating air source heat pump technology or by adding an element of biomass or micro-CHP to a district heating scheme.

Where CHP is included, the renewable energy is considered to be the waste heat which is generated as a by-product of the electricity produced. Specific calculation methods are set out within TGD Part L 2021 which detail how compliance should be demonstrated.

### 2.3 Regulation 8 Part (c)

The regulation requires that:
Limiting heat loss and, where appropriate, availing of heat gain through the fabric of the building;
This requires that the fabric of the building is designed to minimise heat loss from the building and that the air permeability of the structure limits the unwanted passage of air into the building.

Typical compliant U-Values are as follows.

| Pitched roof | $0.16 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ |
| :--- | :--- |
| Flat roof | $0.20 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ |
| Walls | $0.18 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ |
| Floor | $0.18 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ |
| Windows | $1.4 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ |

The u-values of individual elements can be relaxed if required provided that compensatory measures are taken on other elements and that the overall area weighted u-value for the entire dwelling is the same as it would have been if all individual elements had complied.

The thermal bridging details of junctions in the envelope of the building (floor-wall; wall-window; wall-roof, etc) must also be designed and constructed in accordance with the guidance set out in Limiting Thermal Bridging and Air Infiltration - Acceptable Construction Details

Every dwelling must also be subjected to an air pressure test to determine the air tightness. All dwellings must achieve and air tightness of less than $5 \mathrm{~m}^{3} / \mathrm{m}^{2} /$ hour when tested at 50 Pascals. In multiple dwelling developments with repeating apartment types, testing can be conducted on a representative sample of units in accordance with Table 1.5.4.3 of TGD Part L 2021.

### 2.4 Regulation 8 Parts (d \& e)

The regulation requires that:
Providing and commissioning energy efficient space and water heating systems with efficient heat sources and effective controls;

Providing that all oil and gas fired boilers shall meet a minimum seasonal efficiency of 90\%;
These require that gas or oil-fired boilers are at least $90 \%$ efficient and that heating controls allow independent time control of the heating ( 2 zones for dwellings larger than $100 \mathrm{~m}^{2}$ ) and hot water. Heating in each zone should also be controlled by room thermostats (in the case of heating) and cylinder stats (in the case of hot water).

### 2.5 Regulation 8 Parts (f)

The regulation requires that:
Providing to the dwelling owner sufficient information about the building, the fixed building services and their maintenance requirements so that the building can be operated in such a manner as to use no more fuel and energy than is reasonable.
This requires that information is provided to the dwelling owner which relates to the effective and efficient operation of the systems installed in that dwelling. Instructions on how to control the heating \& hot water systems based on time and temperature requirements.

### 2.6 Requirements for Common Areas

Section 0.1.2.3 requires that:
Where a new dwelling forms part of a larger building, the guidance in this document applies to the individual dwelling, and the relevant guidance in Technical Guidance Document L - Conservation
of Fuel and Energy - Buildings other than dwellings applies to the non-dwelling parts of the building such as common areas (including common areas of apartment blocks), and in the case of mixeduse developments, the commercial or retail space.

This requires that the common areas of the apartment blocks are design to meet Part $L 2017$ for Buildings Other Than Dwellings and will require that a portion of the energy demand for the common areas is met by a renewable energy source.

## 3. Building Fabric

Before considering efficient building services or renewable energy systems, the form and fabric of a building must be assessed and optimised so as to reduce the energy demand for heating, lighting and ventilation. Target performance levels have been identified by the design team and are presented below.

### 3.1 Elemental U-Values

The U-Value of a building element is a measure of the amount of heat energy that will pass through the constituent element of the building envelope. Increasing the insulation levels in each element will reduce the heat lost during the heating season and this in turn will reduce the consumption of fuel and the associated carbon emissions and operating costs.

It is the intention of the design team to exceed the requirements of the building regulations. Target U Values are identified below.

| U-Values | Range of Target <br> Values Proposed | Part L 2019 (Residential) <br> Compliant Values |
| :--- | :---: | :---: |
| Floor | 0.10 to $0.18 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ | $0.18 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ |
| Roof (Flat) | 0.12 to $0.20 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ | $0.20 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ |
| Roof <br> (Pitched) | 0.10 to $0.16 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ | $0.16 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ |
| Walls | 0.10 to $0.18 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ | $0.18 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ |
| Windows | 0.9 to $1.4 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ | $1.4 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ |

### 3.2 Air Permeability

A major consideration in reducing the heat losses in a building is the air infiltration. This essentially relates to the ingress of cold outdoor air into the building and the corresponding displacement of the heated internal air. This incoming cold air must be heated if comfort conditions are to be maintained. In a traditionally constructed building, infiltration can account for 30 to 40 percent of the total heat loss, however construction standards continue to improve in this area.
With good design and strict on-site control of building techniques, infiltration losses can be significantly reduced, resulting in equivalent savings in energy consumption, emissions and running costs.

In order to ensure that a sufficient level of air tightness is achieved, air permeability testing will be specified in tender documents, with the responsibility being placed on the main contractor to carry out testing and achieve the targets identified in the tender documents.

A design air permeability target of $\mathbf{3 \mathrm { m } 3 / \mathrm { m } 2 / \mathrm { hr }}$ has been identified for the apartments on the site.
The air permeability testing will be carried out in accordance with BS EN 13829:2001 'Determination of air permeability of buildings, fan pressurisation method' and CIBSE TM23: 2000 'Testing buildings for air leakage"

### 3.3 Thermal Bridging

Thermal bridges occur at junctions between planar elements of the building fabric and are typically defined as areas where heat can escape the building fabric due to a lack of continuity of the insulation in the adjoin elements.
Careful design and detailing of the manner in which insulation is installed at these junctions can reduce the rate at which the heat escapes. Standard good practice details are available and are known as Acceptable Construction Details (ACDs). Adherence to these details is known to reduce the rate at which heat is lost.
The rate at which heat is lost is quantified by the Thermal Bridging Factor of the dwelling and measured in W/m2K. The Thermal Bridging Factor is used in the overall dwelling Part $L$ calculation, this value can be entered in three different ways:

$$
\begin{array}{ll}
0.15 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K} & \text { Used where the ACDs are not adhered to } \\
0.08 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K} & \text { Used where the ACDs are fully adhered to } \\
<0.08 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K} & \begin{array}{l}
\text { Used where the thermal details are thermally modelled and considered } \\
\text { to perform better than the ACDs }
\end{array}
\end{array}
$$

It is intended that the ACDs will be adhered where suitable benchmarks exist and that thermal modelling will be carried out for any non-standard junction details within proposed development and that the resultant Thermal Bridging Factor will be less than $0.08 \mathrm{~W} / \mathrm{m} 2 \mathrm{~K}$.

## 4. Heat Sources \& Renewable Energy Options \& Proposals

All new dwellings must meet overall energy performance levels (as defined by the Energy Performance Coefficient - EPC) and must have a portion of their annual energy demand provided by renewable energy sources.
The renewable energy source can be thermal energy such as solar thermal collection, biomass boilers or heat pumps or it can be electrical energy as generated by photovoltaic solar panels or wind turbines. The minimum renewable energy contributions defined in Part L 2019 Part (b) is 20\% of the total energy consumption for the dwelling.
Two main fuel sources are generally available for developments of this nature, natural gas and electricity. Each present distinct options for compliance with the new standards. Solutions involving gas as the primary fuel source will typically include a solar technology such as PV panels to meet the renewable energy requirements while solutions relying on electricity will include heat pump technology.
The options presented in Sections $4.1 \& 4.2$ below set out the options for the houses proposed for the site and Sections 4.3 to 4.5 set out the options for the proposed apartments. Each is based on the building fabric performance levels identified in Table 1 in Section 3.
The final selection and combination of technologies will most likely be selected from these options based on a more in-depth technical and financial appraisal of the technologies which will be carried out during detailed design.

### 4.1 Houses Option 1 - Individual Gas Fired Boilers with Solar Panels.

The use of natural gas to provide heating and hot water to dwellings and commercial buildings is very common due to its convenience and to low fuel prices. There is existing Gas Networks Ireland infrastructure in the vicinity of the proposed development and Gas Networks Ireland are aware of the proposed extent of development on the subject lands and have confirmed that there is adequate capacity in the network. High efficiency gas fired condensing boilers convert gas to heat energy with an efficiency of over $90 \%$.

Both Solar PV and Solar Thermal Collection harvest the sun's energy to provide a renewable energy source for the dwelling. In the case of PV, the sun's energy is converted into electrical energy which offsets the use of grid electricity while in the case of solar thermal collection it is converted into thermal energy which is used to heat domestic hot water within the building.

Since the introduction of Part L 2011 the use of PV panels has become the most common approach for achieving Part L compliance as the quantity of panels provided on each dwelling can be tailored specifically to ensure that both the minimum renewable energy requirements and the overall dwelling energy performance coefficient (EPC) are compliant with regulations L3 (a) and (b).

### 4.2 Houses Option 2-Air Source Heat Pumps

Air source heat pumps (ASHPs) utilise grid supplied electricity to extract thermal energy from a heat source, in this case, the external ambient air. While the electricity consumed is obviously not renewable energy, the efficiency at which a heat pump operates allows a significant portion of the heat delivered to be considered as renewable energy. The amount of heat considered to be renewable is determined by the efficiency of the heat pump and the "primary energy conversion factor" for grid supplied electricity. Typically, approximately $40 \%$ to $50 \%$ of the heat supplied is considered to be renewable energy.

Air source heat pumps require an indoor and an outdoor component. The outdoor unit is the evaporator which extracts the thermal energy from the ambient air while the indoor unit typically includes the heating buffer tanks and the hot water cylinder for the dwelling. The outdoor unit is typically located in the back garden of a dwelling.

In recent years, the design of ASHPs has improved bringing about higher efficiencies and reduced costs. This, in turn, has led to an increase use of this technology in large scale housing developments. Certified seasonal efficiencies of some models can exceed $500 \%$ meaning that the use of this technology can easily deliver compliance with current Part $L$ requirements.

For apartments, there is an increasing number of manufacturers offering products which incorporate air source heat pump technology but which do not require the traditional "outdoor unit" making them suitable for apartments, these are general referred to as "Exhaust Air Heat Pumps" and are capable of extracting air from both the air within the apartment and from the outdoor air through a ducting system.

### 4.3 Apartments Option 1 - Individual Plant with Exhaust Air Heat Pumps

Exhaust Air heat pumps (EAHPs) operate in a very similar manner to the more conventional air source heat pumps and utilise grid supplied electricity to extract thermal energy from a heat source, in this case, the internal air within the apartment. The internal air is extracted from kitchens and wet rooms and is drawn into the heat pump via ductwork in the ceiling void. The heat pump extracts heat from this air before expelling it from the apartment.

While the electricity consumed is not renewable energy, the efficiency at which a heat pump operates allows a significant portion of the heat delivered to the dwelling be considered as renewable energy. The amount of heat considered to be renewable is determined by the efficiency of the heat pump and the "primary energy conversion factor" for grid supplied electricity. Typically, approximately $30 \%$ to $40 \%$ of the heat supplied is considered to be renewable energy.
There are a number of manufacturers offering products of this type and the certified seasonal efficiencies of some models can exceed $450 \%$ in heating mode and $170 \%$ to $190 \%$ in hot water mode. These efficiencies can deliver Part L 2019 compliance in most circumstances but in some instances may need supplementary PV panels in order to meet the required energy targets.
There is no requirement for a separate Mechanical Extract Ventilation (MEV) systems when an exhaust air heat pump is used as the heat pump draws the air from all wet rooms in the same manner as an MEV system would. The fan will run continuously to ensure that the minimum ventilation rates are maintained and the supply air to the dwelling is provided through trickle vents in each habitable room.

### 4.4 Apartments Option 2 - Electric Heaters, Hot Water Heat Pumps, Heat Recovery Ventilation \& PV Panels

This approach includes the provision of electric storage and/or convector heaters in the living \& sleeping areas to meet all of the space heating requirements with electric towel rads provided in main bathrooms and en-suites.

The hot water demand is met by a hot water heat pump which utilise grid supplied electricity to extract thermal energy from a heat source in a similar manner to an Exhaust Air Heat Pump. The heat pump is ducted directly to the external façade through insulated supply \& exhaust ductwork and uses external air for the hot water needs. It can use up to 3 times less electricity than direct acting water heaters and produces renewable energy to aid Part L compliance.

Heat Recovery Ventilation would then be provided in order meet the ventilation needs of the apartments. Air is extracted from wet rooms and supplied to living spaces via a central unit which contains supply and
extract fans and a heat exchanger. This system recovers the heat from the warm air being extracted from the dwelling and uses the heat recovered to raise the temperature of the incoming air stream leading to improved overall efficiency.
PV panels are also then needed to improve the overall renewable energy contribution and improve the overall energy performance of the dwellings. Generally, 1 or 2 PV panels will be required for each apartment.

### 4.5 Apartments Option 3-District Heating

This approach would involve the generation of heat in a central location on the site and the distribution of this heat to each apartment via a network district heating pipework. The central plant used to generate the heat could include Air Source Heat Pumps, Combined Heat and Power (CHP) plan and high efficiency gas fired condensing boilers.

A CHP unit uses gas as its energy source to create electricity which can be utilised within the proposed development. This process of creating electricity results in the generation of "waste heat" which can then be used to meet a proportion of the heating and hot water demands of the housing development. Since the waste heat is captured it can be considered to be renewable energy and therefore contributes towards the overall $20 \%$ renewable energy requirement.

The Air Source Heat Pumps (ASHPs) utilise grid supplied electricity to extract thermal energy from a heat source, in this case, the external ambient air. While the electricity consumed is not considered renewable energy, the efficiency at which a heat pump operates allows a significant portion of the heat delivered to be considered as renewable energy. The amount of heat considered to be renewable is determined by the efficiency of the heat pump and the "primary energy conversion factor" for grid supplied electricity. Typically, approximately $40 \%$ to $50 \%$ of the heat supplied is considered to be renewable energy.
In order to meet the heating and hot water demands of the apartments in the proposed developments a district heating plant centre will be provided in each half of the development. Each plant centre will be capable of generating approximately 750 kW to 1 MW of heat energy. In this arrangement, the CHP would typically be sized to provide up to $30 \%$ of the total annual energy consumption, heat pumps would provide 30 to $40 \%$ and the remaining energy demand will be met by the gas fired boilers.
Heating pipework will be installed throughout the scheme to distribute the heat generated in the plant room throughout the apartment development, serving each apartment via a heat interface unit (HIU). The HIU will both control and meter the consumption of heat and hot water within each individual dwelling allowing occupants to set the times they need space heating and ensuring they are charged accordingly.

Heat Recovery Ventilation would then be provided in order meet the ventilation needs of the apartments. Air is extracted from wet rooms and supplied to living spaces via a central unit which contains supply and extract fans and a heat exchanger. This system recovers the heat from the warm air being extracted from the dwelling and uses the heat recovered to raise the temperature of the incoming air stream leading to improved overall efficiency.

### 4.6 Apartment Corridors/Landlord Areas

In accordance with the requirements of Part L 2021, the common areas within the apartment blocks are required to meet the requirements of Part L 2021 for "Buildings Other Than Dwellings". Under Part L 2017, a portion ( $10 \%$ to $20 \%$ ) of the energy demand of the common areas must be met by a renewable energy source. The energy demand within these spaces will be exclusively provided by electrical energy (lighting, space heating \& lifts etc) so a photovoltaic array would be best suited to meet this renewable energy demand.

## 5. Proposed Solutions

The preceding sections of this report set out the regulatory requirements with which the scheme will have to comply while identifying a number of technologies and design approaches that may be utilised to achieve compliance.

The building fabric standards and the technology solutions discussed will all be assessed in greater detail during the detailed design stage of the project. A cost benefit analysis of all these available solutions will be carried out to determine the correct balance between an efficient building envelope and the most appropriate combination of technology and renewable energy systems.
The proposed approach to achieving Part L Compliance will be based on a combination of the solutions below once a detailed analysis has been completed at detailed design stage. A final decision will be made once capital costs, renewable targets and regulation compliance have all been compared to find the most appropriate solution.

### 5.1 Houses

The most likely overall solution that will be implemented will include the following measures

- Exceed minimum U-Value standards by $20 \%$ to $30 \%$,
- Achieve air tightness standards of $3 \mathrm{~m}^{3} / \mathrm{m}^{2} / \mathrm{hr}$
- Ensure thermal bridging details are designed to achieve thermal bridging factors of $0.08 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ or less.
- Provide an appropriate combination of technologies to ensure energy consumption is in line with Part L 2021 requirements. This will either include air source heat pumps and/or an alternative heating system such as gas boilers with PV panels for renewable energy.
- Install centralised mechanical ventilation systems to ensure adequate ventilation rates are achieved in the dwelling which maximising the benefits of the airtight construction


### 5.2 Apartments

The most likely overall solution that will be implemented will include the following measures

- Exceed minimum U-Value standards by $20 \%$ to $30 \%$,
- Achieve air tightness standards of $3 \mathrm{~m}^{3} / \mathrm{m}^{2} / \mathrm{hr}$
- Ensure thermal bridging details are designed to achieve thermal bridging factors of $0.08 \mathrm{~W} / \mathrm{m}^{2} \mathrm{~K}$ or less.
- Provide an appropriate combination of technologies to ensure energy consumption is in line with Part L 2021 requirements. This will most likely include individual plant in each apartment, either exhaust air heat pumps or electric heaters and hot water heat pumps. It is unlikely that a district heating system will be viable on such small apartment blocks.f
- Install centralised mechanical ventilation systems to ensure adequate ventilation rates are achieved in the dwelling which maximising the benefits of the airtight construction


## 6. Existing \& Proposed Utilities

### 6.1 Natural Gas

Gas Networks Ireland have been contacted and an existing natural gas network map for the area surrounding the proposed development has been obtained. Refer to Appendix A

There is an existing natural gas infrastructure in the vicinity of the site and it is expected that there will be sufficient capacity to cater for this new development.

A formal application cannot be made at this stage but will be made as soon as the planning permission has been granted and the addresses are confirmed.

### 6.2 ESB Networks

ESB Networks have been contacted and an existing ESB network map for the area surrounding the proposed development has been obtained. Refer to Appendix A.

There is extensive ESB Networks infrastructure in the vicinity of the site and it is expected that there will be sufficient capacity to cater for this new development. There are also existing 10kV overhead lines crossing the site. 10KV ESB lines regularly have to be moved to facilitate development and there is a defined mechanism for arranging the diversion and/or undergrounding of these cables. This process will be engaged during the detailed design stage of the project.

A total of 3 ESB Sub-stations are likely to be required to serve the scheme and will be designed to comply with the ESB current guide lines, final agreement on quantities and locations will be obtained once the formal application is made to ESBN.

A formal application cannot be made at this stage but will be made as soon as the planning permission has been granted and the addresses are confirmed.

### 6.3 Openeir

Openeir have been contacted and an existing Openeir map for the area surrounding the proposed development has been obtained. Refer to Appendix A.

There is existing Openeir infrastructure in the vicinity of the site, and we understand it has the capacity to cater for this new development. A formal application cannot be made at this stage but will be made as soon as the planning permission is granted.

The Openeir infrastructure will allow for multiple broadband providers.

### 6.4 Virgin Media

Virgin Media have been contacted and have confirmed that they have no existing maps in the vicinity of the site.

## 7. Microwave Telecommunication Channels

The proposed development at Ballyoulster has been reviewed to determine the possible impact on existing telecommunications channels. There are a number of existing masts in the vicinity of the site with the closest mast being located on the Dublin Road, R403, approximately 300m east of the subject site. The height of the proposed development is such that it is unlikely to have an impact on existing telecommunication channels however it is predicted that telecoms providers will be able to reconfigure their signal mapping to mitigate any impacts the proposed development may have.

Provision will be made in the proposed development for the inclusion of microwave repeater / "hop-site" that can be utilised if an existing microwave link is found to be impacted by the development. A more complete analysis will be conducted during the detailed design stage and, if required, a specialist consultant will be appointed to liaise with the design team and with the telecoms operators to ensure that any impacts are addressed and mitigated.


Telecoms Providers masts in the vicinity of the subject site (Source: Comreg Site Viewer)

## Appendix A - Existing Utility Maps



TITLE:






## UK and Ireland Office Locations



