



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

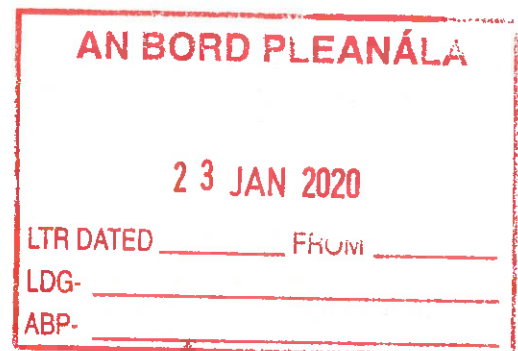
Environmental Health Service,
Health Service Executive,
Galway Business Park,
Dangan,
Galway
Phone: 091737350

An Bord Pleanála
64 Marlborough Street,
Dublin 1

Environmental Health Service Consultation Report

(as a statutory consultee under the Planning and Development Acts 2000 (as amended) Regulations made thereunder)

Report to: An Bord Pleanála
Type of Consultation: EIAR
Planning Authority: Galway County Council
Reference Number: PL07 .302848
EHIS Reference Number: 1055
Applicant: Galway County Council



Proposed Development: Galway County Council has applied to An Bord Pleanála for approval in relation to the **N6 Galway City Ring Road**. This proposed road development commences west of Bearna on the R336 and traverses to the north of Galway City to tie-in to the existing N6 at Coolagh, Briarhill to the east of Galway City and includes the provision of a new single carriageway, consisting of one lane and a hard shoulder in each direction and a dual carriageway, consisting of two lanes and a hard shoulder in each direction divided by a segregating barrier, new link roads, the realignment/improvement of regional, county and local roads crossed by the proposed road development and localised works to the existing electricity transmission and distribution network, together with all ancillary and consequential works associated therewith.

The following HSE stakeholders were made aware of the application on 5 December 2019

- Emergency Planning – Kay Kennington
- Estates – Helen Maher
- Assistant National Director for Health Protection – Kevin Kelleher / Laura Murphy
- CHO – Tony Canavan

General introduction

This report only comments on Environmental Health impacts of the proposed development as outlined in this EIAR and the adequacy of the EIAR from the Environmental Health viewpoint. The Environmental Health Service has made observations and submissions on the following specific Environmental Health areas:

1. Assessment of principle and description of the project

The EIAR prepared on behalf of Galway County Council has provided detailed evidence of the benefits of, and the need for the proposed Galway City Ring Road. It refers to numerous national, regional and local policies and strategies which support this development, including 'Project Ireland 2040', 'Smarter Travel – A Sustainable Transport Future' (2009) and 'Galway Transport Strategy'

The EIAR which accompanies the application to An Bord Pleanála provides a comprehensive description of the proposed development to provide a ring road around Galway city, which will comprise 18km of road infrastructure originating west of Bearna, passing north of the city and tying in to the existing N6 at Coolagh, Briarhill. The extent of the proposed project is described in Chapter 5 '*Description of the Proposed Road Development*'

A succinct summary of the proposed scheme is contained in 'Volume 1 –Non-Technical Summary'. Each phase of the proposed development is detailed in the EIAR and accompanying plans, drawings and schematics.

The Environmental Health Service (EHS) notes the requirement for the construction of a ring road for Galway city which is detailed in Chapter 3 of the EIAR '*Need for the Proposed Road Development*' which is summarised as '*The need for the proposed road development arises directly from the necessity to address the very serious transport issues facing Galway City and its environs*'

2. Assessment of later consents

From the information provided in the EIAR relating to emissions to surface and ground water, and emissions to air, including noise, vibration and dust, it is not expected that any later consents will be required.

Chapter 7 '*Construction Activities*' and Appendix A.7.5 '*Construction Environment Management Plan*' provides details of the CEMP to be implemented during the construction phase of the project.

Chapter 7.6.8 '*Waste Management*' states, where possible, wastes arising from the construction process will be recycled and reused within the project and that '*all waste removed from the site will be collected only by contractors with valid waste collection permits, under the Waste Management (Facility Permit and Registration) Regulations 2007 and (Amendment) Regulations 2008, 2014, 2015. All facilities to which waste will be taken will have appropriate waste licences or permits, under the Waste Management Act 1996, as amended, and the regulations thereunder, allowing them to accept the type of waste that is to be sent there.*'

3. Assessment of Public Consultation and Non-Technical Summary

Chapter 1.4 of the EIAR '*Consultation Process/Non-Statutory Consultation*' and Chapter 3 '*Consultation*' of the Non-Technical Summary details the key stakeholders and statutory bodies which were consulted prior to the submission of the planning application for the N6 Galway City Ring Road to An Bord Pleanála.

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Over fifty key stakeholders and relevant statutory bodies in addition to property owners, local organisations and utility/service were consulted. In addition, four public information sessions were held from July 2014 to November 2016, including two public display sessions which were held on 25 and 26 May 2015 on the Emerging Preferred Route Corridor (EPRC) at two locations in Galway.

Feedback from these events was used to select the preferred route. Individual home visits were undertaken to property owners impacted by the proposed development and written correspondence sent to them. A website dedicated to the project –www.n6galwaycity.ie – was created to keep the public informed on the progress of the project.

Details of the Consultation process and submissions/comments received are included in Appendices A.1.1 to A.1.3 'Public Consultation'.

The Environmental Health Service notes that some time has passed since these consultation events and recommends that, in addition to the website, if permission is granted for the proposal, the community receives regular updates on the progress of the construction of the Galway City Ring Road by means of posters, articles in local newspapers and on local radio/television.

The EIAR Non-Technical Summary provides a comprehensive, clear summary of the EIAR process, the proposed Galway City Ring Road development and its potential significant impacts on public health. The Environmental Health Service notes that statutory and non-statutory agencies and stakeholders were consulted and that extensive and meaningful public consultation has been undertaken to date.

Based on the information contained in the EIAR, the Environmental Health Service (EHS) is satisfied that adequate consultation has been undertaken with regard to the proposed N6 Galway City Ring Road.

4. Assessment of the Physical Environment

The EIAR states that 'an area of approximately 180ha is required for the proposed road development construction works' which will comprise 5.6km of single carriageway and 11.9km of dual carriageway from Bearna to the west of the city to Briarhill to the east. In order to accommodate the existing landscape, environmental features and residential properties, the proposed road has been designed to include a bridge, viaducts, tunnels, retaining walls, alterations to road junctions and the lowering of part of the road. The construction of the proposed by pass is expected to take thirty six months.

Chapter 7.4 'Construction Activities' of the EIAR acknowledges that 'the construction of the proposed road development will include activities such as excavation, embankment and structural construction, tunnelling, piling, rock breaking and movement of materials' which 'will generate noise, dust and movement of machinery which will potentially impact on the surrounding environment'

The Environmental Health Service notes the legislation, data sources and consultations referred to in the preparation of the chapter on Population and Human Health. The proposed N6 Galway City Ring Road development will involve a considerable number of residential and commercial demolitions and acquisitions, the impacts of which are assessed in the EIAR.

- **Surface water and ground water**

The Environmental Health Service has reviewed the chapters on Hydrogeology (Chapter 10) and Hydrology (Chapter 11) and is satisfied with the methodology used in the compilation of these chapters. Both detailed desk top studies and field visits were undertaken in the assessment of the impacts of the proposed road development on surface and ground water.

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Quantitative and Qualitative impacts of the proposed road development on surface water bodies were assessed in Chapter 11.

Hydrological drainage catchments impacted by the proposed road development are identified in Chapter 11. The results of water quality monitoring of the River Corrib and the Terryland River, undertaken by the EPA as part of the River Water Quality Programme categorise the River Corrib as having good status (Q4) for the period (2004 - 2015) and the Terryland River as having poor Status (Q2-3).

The results of water quality monitoring of Lough Corrib indicate that pollution levels in the lake are low.

The hydrogeological investigations for the proposed road development comprised 97 groundwater installations and testing including groundwater monitoring wells, groundwater level and groundwater quality monitoring, infiltration tests, pumping tests and variable head permeability tests, packer tests and step pumping tests. New monitoring wells were installed as part of the assessment of hydrogeology and hydrology in the vicinity of the proposed road development. Private wells identified along the route were included in the assessment. The Environmental Health Service is not aware of any food premises on a private water supply which might be impacted.

The route of the proposed road includes development over a 'poorly productive' aquifer to the west and 'regionally important' aquifers to the east. As part of the assessment of the receiving environment the proposed route has been divided into four sections each of which is described in terms of hydrogeology, hydrology and soils and geology. Groundwater vulnerability, bedrock aquifer, aquifer properties, recharge, water quality and groundwater levels are all assessed in each of the four sections.

The potential impacts on aquifers within the study area have been evaluated (Chapter 10.5.3.1.1 Galway Granite Batholith (Section 1)). The impact on the aquifer of the excavation of granite for construction is considered to be 'negligible' and the significance of the impact is 'imperceptible'. Recharge rates are not predicted to change during construction and the impact of the lowering of groundwater levels at eight locations during construction has been assessed with the impact regarded as 'negligible' and the significance of the impact considered as being 'imperceptible'

One potential source of contamination of groundwater during construction is from accidental spillages of polluting materials on site. Mitigation measures to limit any potential significant effects on ground and surface water are detailed in Chapter 10.6 'Mitigation'.

Twelve private wells in total have been identified down gradient of the proposed road development. A detailed assessment of the construction impacts of the road development is contained in Chapter 10, which concluded that five wells will be permanently impacted by the work and will be removed and decommissioned in accordance with guidance produced by the IGI and the EPA.

Chapter 10.6.2.2.2 'Mitigation measures specific for supply wells' states that the loss of each well will be mitigated by providing a replacement well, connecting to the mains supply or by financial compensation.

Potential construction phase impacts of the proposed road development on receptors are summarised in both text and tabular format (Chapter 10.5.3.5 and Table 10.20)

Chapter 10.5.4 describes the Operational Phase Impacts and identifies that potential impacts to groundwater quality during operation of the proposed road are likely to occur from infiltration to ground from the proposed road rainwater runoff. Infiltration basins are described in this chapter and include a containment area, a hydrocarbon interceptor and a wetland as standard. In addition, the EIAR states that

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'there is also a containment area in each drainage network that can manually be activated to contain spillage on the proposed carriageway'.

The potential impacts on wells during the operational phase of the proposed road have been assessed as the same as impacts during the construction phase. Five wells will be removed by the proposed road development at the construction phase with a further well being identified as *'lying down gradient and within the 100-day TOT from the proposed road development'*.

A summary of the design measures incorporated in the operation phase is detailed in Chapter 10 (10.5.4.5 Summary) and in Table 10.25 (Summary of impact magnitude and significance for hydrogeological aspects of receptors at risk during the operation phase of the proposed road development)

Chapters 10.6 and 11.6 describe in detail the measures to be implemented at both the construction and operational phases of the project in order to mitigate any potential significant effects on ground and surface water. It is noted that the construction compound will be located on dry land and that the storage of oils, fuel, chemicals and hydraulic fluids will not occur within 100m of the River Corrib. Measures included in the Construction Environmental Management Plan to *'minimise the opportunity for contaminated releases of construction runoff'* are outlined. A 'Karst Protocol' will be implemented in the event of a karst being encountered during construction. In addition to the mitigation measures outlined referred to relating to supply wells, the Environmental Health Service notes that *'all wells within 150m of the proposed development (or 50m from the calculated drawdown Zol if greater) will be monitored for water level on a monthly basis for 12 months before construction, during construction and for 12 months after construction. If the monitoring indicates that the proposed road development has impacted on a supply or geothermal well then mitigation will be applied'* (Chapter 10.6.2.2.2 Mitigation measures specific for supply wells)

Chapter 7.4.10 'Services and Utility Requirements for Construction' outlines that water for the proposed thirteen site compounds will be supplied via connections to the existing Irish Water water mains and that dedicated foul effluent generated during construction will be stored in dedicated holding tanks at compounds where welfare facilities are provided. The EIA states that this effluent 'will be regularly disposed of offsite by tanker by a licenced contractor to an approved licenced facility'

Chapter 10 (Table 10.18: Impact assessment of wells within the study area (pre-mitigation)) states that *'One well (W1000-02) has a potential risk for water quality deterioration as it lies down gradient and within the 100-day TOT from the proposed road development'* but the Environmental Health Service was unable to identify mitigation measures proposed to minimise significant impacts to this well. The Environmental Health Service is satisfied that, if this query is addressed, the measures described in Chapters 10 and 11, if implemented in full will mitigate any significant effects on ground and surface water as a result of the proposed road development.

- Air Quality

Chapter 16 'Air Quality and Climate' refers to guidelines and legislation which was considered when assessing the impact on air quality during both the construction and operation of the proposed road development. Reference is made to the NRA's 'Design Manual for Roads and Bridges' which states that *'only properties and designated sites within 200m of the roads affected by the project need be considered'* in the assessment of air quality impacts. The location of sensitive receptors is detailed in the EIA and it is acknowledged that in some cases, there is potential for significant PM₁₀ and vegetation effects with standard dust control mitigation measures in place.

Chapter 16 states that *'three months of site specific air quality monitoring was carried out in the vicinity of the proposed road development'*.

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Details are provided of the methodology used in air quality modelling assessments undertaken in the preparation of the chapter on 'Air Quality and Climate'

Chapter 16.4.1 'Construction Phase' of the EIAR states that dust emissions are likely to arise from site earthworks, wind blow from temporary stockpiles, handling of construction materials, landscaping, construction traffic movements, demolitions and concrete batching and crushing. The potential dust impacts at locations where the main construction works will occur are assessed. Mitigation measures to be adopted during construction are described in Chapter 16.6.2.1 'Air Quality'. **In addition to the mitigation measures outlined in the EIAR, the Environmental Health Service recommends that every truck hauling construction material should be covered with electric trailer covers or tarpaulin. The covering of trucks should not be limited to periods of dry weather.**

The Environmental Health Service notes the proposal to undertake dust deposition monitoring at a number of sites in the vicinity of the proposed road development, including at the two nearest sensitive receptors, during construction activity. The Bergerhoff Method as specified in the German TA Luft Air Quality Standards (TA Luft 1986) will be used. Should an exceedance of the TA Luft limit (total dust deposition should not exceed 350mg/m² /day when averaged over a thirty day period) occur during the construction phase or a complaint be received in relation to dust levels, additional mitigation measures, for example more regular spraying of water, will be implemented.

The EIAR states that '*at least one month of dust deposition monitoring will be carried out in advance of the commencement of works to determine a baseline*' and that it is proposed to carry out '*particulate monitoring (PM10 and PM2.5) at the nearest sensitive receptors upwind and downwind of the construction works where sensitive receptors have been identified within 25m of the works*' which will allow direct comparison with the PM₁₀ and PM_{2.5} air quality standards on a daily basis.

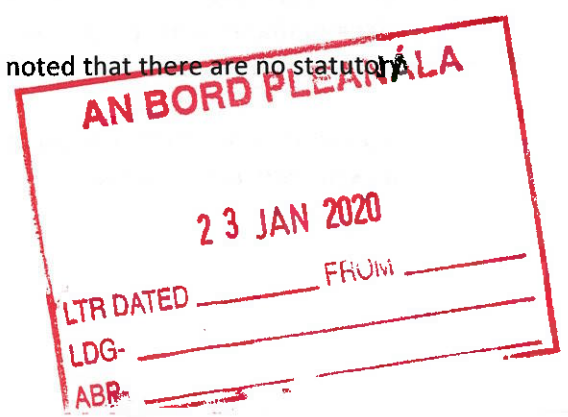
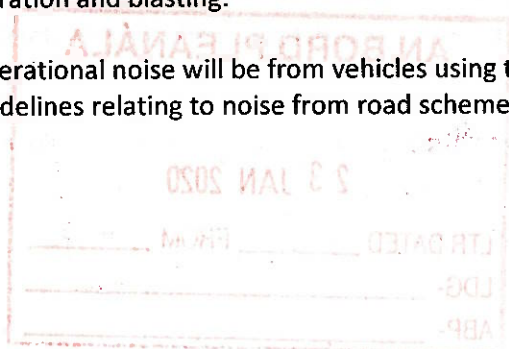
For the operational phase of the proposed road development, the EIAR states that '*as it is predicted that all air quality standards for the protection of human health and vegetation will be complied with, no specific mitigation measures are required*'.

The Environmental Health Service recommends that, should consent be granted for the proposed N6 Galway Ring Road, all mitigation measures referred to in the EIAR in relation to air quality are applied as conditions of approval. This is in order to protect public health by minimising the significant impacts of the proposed construction works on air quality.

- **Noise and vibration**

The impacts of noise and vibration from the proposed N6 Galway Ring Road are evaluated in Chapter 17 of the EIAR. The Environmental Health Service has reviewed the methodology used as described in Chapter 17.2 and is satisfied that sensitive receptors have been identified, existing noise levels have been established and noise levels generated by both the construction and operation of the proposed road have been predicted. Results obtained have been compared against noise criteria specified in guidance relating to road schemes contained in both TII and EPA guidance. Noise impacts during construction are anticipated to arise from ground breaking, earthworks and earthworks haulage, drainage works, construction of drainage ponds and surfacing works, construction of tunnels, bridges and overpasses, construction vehicle noise, vibration and blasting.

Operational noise will be from vehicles using the proposed road. It is noted that there are no statutory guidelines relating to noise from road schemes in Ireland.



Chapter 17.2.4 (Study area and Baseline Data Collection) details the selection of locations for the baseline noise survey and the use of both unattended monitoring stations (33 No.) and attended measurement locations (73 No.) to illustrate the noise environment within each location.

Baseline noise surveys were undertaken over 15 days during the spring/ early summer of 2016 and over 6 days in August of 2017. The results of the Baseline Survey are provided in Table 17.8 'Summary of Baseline Survey Results' and are expressed as L_{den} and vary from $42L_{den}$ at an attended monitoring location at Na Forai Maola to $78L_{den}$ at an attended monitoring location on the N84 Headford Road.

Chapter 17.4.1 'Construction Phase' states that 'it is envisaged that an east to west build will be adopted and construction may be completed in two concurrent phases or a single overall contract:

- Phase 1 – N6 Coolagh to N59 Letteragh Junction – 9.9km (Including the N59 Link Road North and South.)

- Phase 2 – N59 Letteragh Junction to R336 Coast Road west of Bearna -7.5km' and hours of construction will be:

07.00 - 1900 Monday – Friday

07.00 -1600 Saturday

It is expected that there will be 10 weeks of night time work during the 36 month construction phase mainly to undertake work associated with the construction of bridges over existing roads.

Table 17.9 'Indicative construction noise calculations at varying distances' indicates that 'construction activities with highest noise levels (L_{Aeq} up to 93dB at 10m), the daytime construction noise limit value of 70dB L_{Aeq} Monday through Friday (07:00 to 19:00hrs) is likely to be exceeded at distances of up to 100m from the works boundary in the absence of any noise mitigation'.

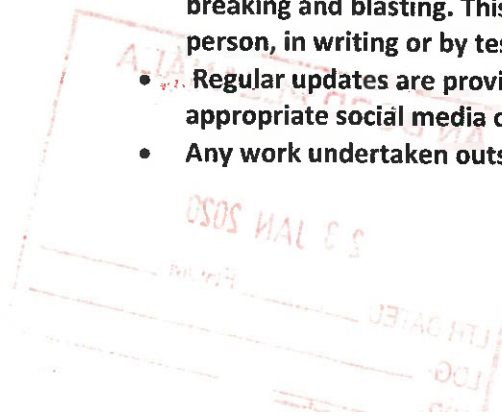
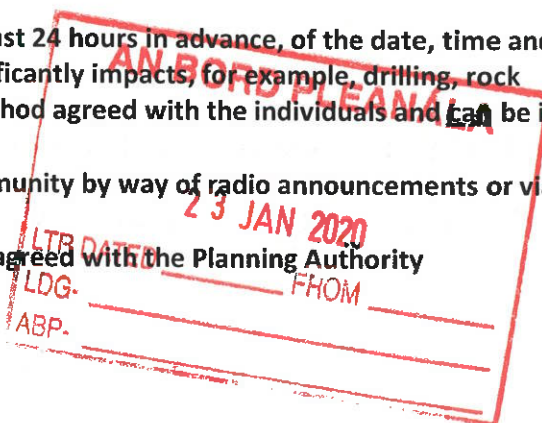
Mitigation measures to minimise the significant impacts of noise from the construction of the proposed road development are detailed in Chapter 17.6 of the EAIR and include an obligation for the contractor to comply with BS 5228 'Code of Practice for Noise and Vibration Control on Construction and Open Sites – Noise' and the 'European Communities (Noise Emission by Equipment for Use Outdoors) Regulations, 2001'

The Environmental Health Service notes an acknowledgement in the EIA of the importance for 'liaison with the public' and emphasises the importance of compliance with this measure. While it is noted in the EIA that a 'noise liaison officer' will be appointed (which is welcomed by the Environmental Health Service) and that all noise complaints will be logged and investigated, this is regarded as a reactive rather than a proactive measure.

The World Health Organisation (WHO) has identified noise as a significant Public Health issue, particularly if sleep is disturbed. ('Environmental Noise Guidelines for the European Region' WHO 2018)

In addition to the mitigation measures detailed in the EIA it is recommended that

- Individual sensitive receptors are informed at least 24 hours in advance, of the date, time and duration of noisy operations likely to cause significantly impacts, for example, drilling, rock breaking and blasting. This can be done by a method agreed with the individuals and can be in person, in writing or by text message
- Regular updates are provided to the wider community by way of radio announcements or via an appropriate social media channels.
- Any work undertaken outside standard hours is agreed with the Planning Authority



An assessment of predicted vibration levels was conducted as part of the assessment of impacts from the proposed road development. The most significant vibration impacts relate to vibration from excavation and rock-breaking operations.

Low vibration methods of piling, involving bored or augured piles will be selected where possible in order to minimise the levels of both noise and vibration generated.

The EIAR states that *'vibration impacts due to on-going construction works will be not significant and short term'*. The EIAR acknowledges that vibration is likely to cause 'human discomfort' and measures to minimise human discomfort from construction vibration are outlined in the EIAR.

As previously outlined, the EHS emphasises the importance of advance communication with those likely to be impacted. In addition to the location, duration and nature of vibration events, all communication circulars should provide details of a dedicated member of the construction team who can respond to any queries from members of the public. It is recommended that the mitigation measures outlined in Chapter 17.6.2.3 'Vibration' are included as conditions of approval should permission be granted.

- **Operational Phase Noise**

Measures to minimise the impact of noise from the proposed road development include the provision of a Low Noise Road Surface (LNRS) and the use of noise barriers between the road and noise sensitive receptors. The noise barriers may be constructed as earth bunds, proprietary noise barriers or a combination of both. The EHS acknowledges predicted residual noise levels listed in Table 17.15: *'Calculated Residual Noise Levels for Locations Requiring Noise Mitigation'* and also notes that a residual noise level of 61 to 62 L_{den} has been calculated at seven properties on the proposed route. As these levels are above the design goal of 60 L_{den} , the Environmental Health Service is of the opinion that no occupied properties should be excluded and recommends that mitigation measures (proprietary noise barriers, bunds or property specific noise insulation measures for example) should be applied to ensure compliance as this is a health protection standard.

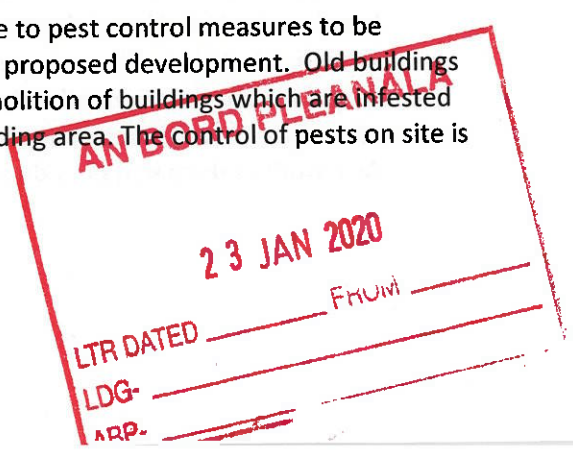
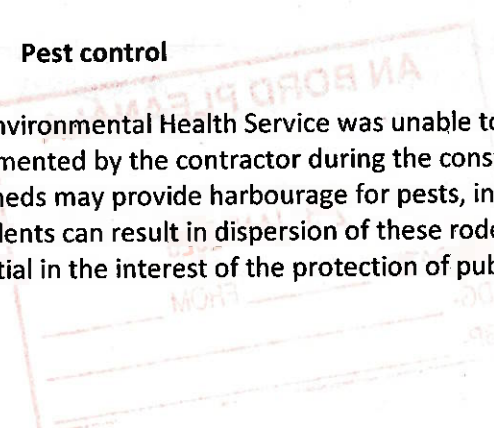
- **Community Severance**

The Environmental Health Service notes that the impact of community severance has been addressed in the EIAR and that where paths and access routes have to be severed, alternative access will be provided where possible. The EIAR states that there will be two permanent road closures – the Anne Gibbons Road (L13215) and the link road from the Western Distributor Road roundabout to Knocknacarra Shopping Centre. The closure of the Ann Gibbons Road will require the creation of a permanent diversion for local traffic whereas a new link road will be constructed to replace the one which it is proposed to close.

The Environmental Health Service recommends that pedestrian and cycle access is maintained or is provided between any communities potentially divided as a result of the proposed road development in order to ensure that the social and psychological impacts of community severance are minimised.

- **Pest control**

The Environmental Health Service was unable to locate any reference to pest control measures to be implemented by the contractor during the construction phase of the proposed development. Old buildings and sheds may provide harbourage for pests, including rodents. Demolition of buildings which are infested by rodents can result in dispersion of these rodents into the surrounding area. The control of pests on site is essential in the interest of the protection of public health.



It is recommended that a Pest Control Plan is incorporated into the 'Construction Environmental Management Plan'.

Recommended Pest Control measures include

- A site survey by a professional Pest Control company should be undertaken at least four weeks prior to any demolition works commencing to identify evidence of pest infestations. (Rats and birds such as crows, feral pigeons, gulls and starlings). Where infestations are identified, appropriate treatments must be implemented to eliminate infestations prior to demolition
- Care should be taken by the contractor not to damage drains or sewers when using machinery, as this can provide an access route for rats onto the site.
- Old redundant sewers and drains should be capped and removed where possible.
- Pest monitoring and surface baiting should be undertaken on site during demolition/construction works.
- Contractors should ensure that the construction site is kept as clean and tidy as possible, and any food debris should be stored in a pest proof container within the welfare facility.
- **Opportunities for Health Gain**

The Environmental Health Service notes that the EIAR states that *'the proposed road development has the potential to provide opportunities for health improvements'* and that *'once operational, the proposed road development will enable the reallocation of existing road space within the city to public transport and smart mobility measures'* (Chapter 18.4.2 Human Beings, Population and Health – Operational phase).

The Environmental Health Service highlights the 'Health in All Policies (HiAP)' concept contained in the Healthy Ireland Framework (2013-2025). Goal 4 of the Healthy Ireland Framework aims to 'create an environment where every individual and sector of society can play their part in achieving a healthy Ireland'. **The EHS recommends that opportunities for health gain are maximised by the provision of walkways and cycle paths, where possible, running parallel to the route of the proposed road and connecting any amenity and employment centres to areas of population**

Conclusion

The Environmental Health Service makes the following recommendations in respect of the proposed N6 Galway Ring Road development

- Should permission be granted, the community should receive regular updates on the progress of the construction of the proposed road scheme by means of posters, articles in local newspapers and on local radio/television, in addition to the information provided in the dedicated website.
- That details are provided on mitigation measures proposed to minimise significant impacts to the well identified as W1000-02 (Chapter 10 (Table 10.18: *Impact assessment of wells within the study area (pre-mitigation)*))
- Every truck hauling construction material should be covered with electric trailer covers or tarpaulin. The covering of trucks should not be limited to periods of dry weather. This is recommended in the

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interest of the protection of public health from the potential significant impacts of dust during the construction phase of the proposed road development.

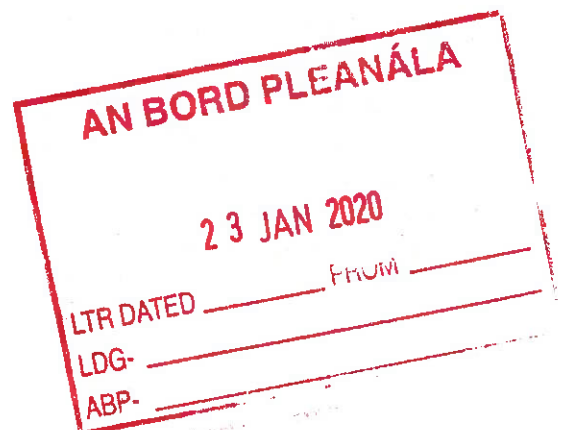
- That individual sensitive receptors are informed at least 24 hours in advance, of the date, time and duration of noisy operations likely to cause significantly impacts, for example, drilling, rock breaking and blasting. This can be done by a method agreed with the individuals and can be in person, in writing or by text message
- Regular updates are provided to the wider community by way of radio announcements or via an appropriate social media channels.
- Any work undertaken outside standard hours is agreed with the Planning Authority
- That noise mitigation measures are detailed for the seven properties on the proposed route where a residual noise level of 61 to 62 L_{den} has been calculated. This is in order to ensure compliance with a health protection standard.
- That pedestrian and cycle access is maintained or is provided between any communities divided as a result of the proposed road development in order to ensure that the social and psychological impacts of community severance are minimised.
- A Pest Control Plan is included in the Construction Environmental Management Plan which includes an advance survey of properties to be demolished and measures to protect damage to drains during construction which might result in a rodent infestation
- That opportunities for health gain are maximised by the provision of walkways and cycle paths, where possible, running parallel to the route of the proposed road.

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An Bord Pleanála,
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Re: EIAR Consultation Report
N6 Galway Ring Road PL07.302848
EHIS Reference: 1055

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Dear Sir/Madam

Please find enclosed the HSE Consultation Report in relation to the above application. If you have any queries regarding this report, the initial contact is Mr Paul Harrington, Principal Environmental Health Officer, who will refer your query to the appropriate person.

Yours faithfully

P.P. Paul Harrington
Principal Environmental Health Officer

