Sinead White

From: Andrew Sulley <Andrew.Sulley@hse.ie>
Sent: Monday 17 November 2025 17:01
To: SIDS
Subject: PAX07.323699 WF shancloon windfarm sid
Attachments: NEHS Observations PAX07.323699 (NEHS ref 5424) WF Beagh, Beagh More Galway.pdf

Categories: Sinead White

Please find observations on PAX07.323699 WF Shancloon windfarm SID

Any clarification required should be sent in the first instance to Andrew.sulley@hse.ie

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National Office for Environmental Health Services
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An Coimisiun Pleanala
64 Marlborough Street
Dublin 1

14th November 2025

Planning ref PAX07.323699

NEHS ref: ID5424

11 no. turbine wind farm and associated infrastructure

in the townlands of Beagh, Beagh More, Cloonbar, Cloonweelaun, Cloonnaglasha, Cloonteen, Corillaun, Derrymore, Ironpool, Shancloon, Toberroe and Tonacooleen, Co. Galway (www.shancloonwindfarmsid.ie) Galway County Council

Enclosed are the observations of the National Environmental Health Service (NEHS) on planning application PAX07 323699 for the Proposed Development of 11 no. turbine wind farm and associated infrastructure. County Galway

Any clarification on the contents of this submission should be made, in the first instance Andrew.sulley@hse.ie quoting NEHS ID5424.

Andrew Sulley
Senior Environmental Health Officer

National Environmental Health Service Submission Report

Date: 14th November 2025

Our reference: ID5424

Report to: An Coimisiún Pleanála
Ref 323699

Type of Consultation: SID with EIAR

The following HSE stakeholders were notified of the application on 10th November 2025:

- National Capital Estates Office – Regional AND
- Director of National Health Protection
- REO West & North West

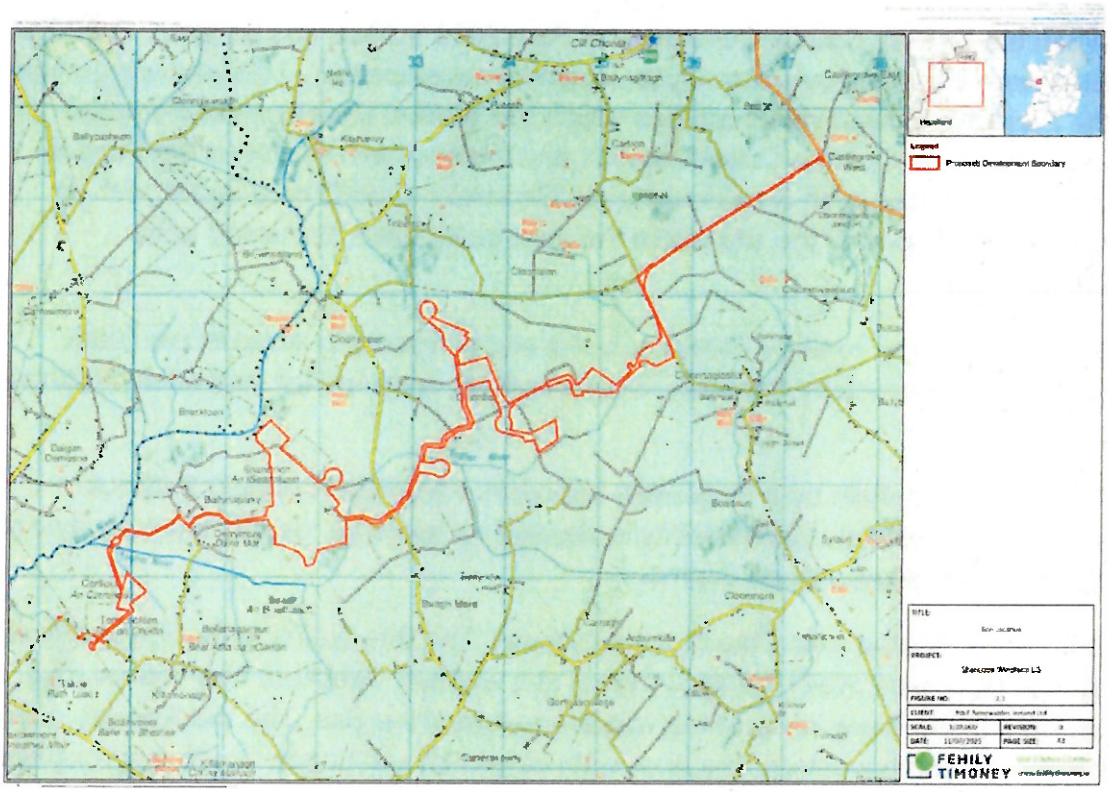
The NEHS submission report is based on an assessment of documentation submitted with the planning application, particularly the accompanying EIAR.

All commitments to future actions in the planning application, including mitigation and further testing, have been taken as read and all data results have been accepted as accurate, unless specifically highlighted in the submission.

No additional investigations/measurements have undertaken by the NEHS.

This report refers only to those sections of the application documents that are relevant to the HSE which have likely significant Environmental Health or Public Health impacts

Site Visit by the NEHS 10th November 2025



A visit to the site of the proposed development was carried out by the NEHS on the 10th November 2025. The following observation were made:

The Proposed Development is located within the townlands of Beagh, Beagh More, Cloonbar, Cloonmweelaun, Cloonnaglasha, Cloonteen, Corillaun, Derrymore, Ironpool, Shancloon, Toberroe and Tonacooleen, County Galway.

The Proposed Wind Farm is located within a rural, agricultural setting in east Galway. The proposed wind farm is wholly located in the jurisdiction of Galway County Council, in proximity to the Mayo border. At its closest point, the turbine array is located approximately 4km north-east of Shrule, County Mayo (which is the closest settlement to the Proposed Development) and 8.5km north-west of Tuam, County Galway.

There are 224 residential properties (or proposed residential developments which have received/hold active planning consent) within 2 km of the turbine array and 49 residential properties (or consented residential developments) within 1km of the turbine array. The closest property to a turbine (Eircode H54 KH73) is located c. 357 m distance from Turbine T01, however this property belongs to an involved landowner, and this receptor is no longer a residential residence. The next nearest

property is a derelict building (currently uninhabitable property) located 720.4m south-east of T1 (no Eircode assigned). The closest inhabited residential property to the Project is located 728m east of T11 (Eircode H54 XC65).

When the Galway County Development Plan 2022 – 2028 was adopted, Wind Farm sites were classified by suitability for potential development. The northern portion of the Project is located within an area which has a Wind Development Potential designation as 'Open to Consideration', and the southern section of the Project shown as located in an area designated 'Generally to be Discouraged', with no turbines in the part of the site within the area designated 'Generally to be Discouraged'

The water supply zone for Cloonnaglasha and surrounding areas is the Tuam Regional Water Supply Scheme. Several private wells are located within 500m of the Site.

The Site is underlain by a Regionally Important Karstified (Conduit) Bedrock Aquifer. Groundwater vulnerability is classed as "extreme" across the majority of the Site due to shallow subsoil depths.

The Site is located within the Black sub-basin. The Site drains to the Togher River and its tributaries, which generally drain in a westerly direction. The Togher River drains into the Black River at the western extent of the Site. The Black River in turn drains in a south-westerly direction, until its terminus at Lough Corrib, approximately 10 km southwest of the Site boundary

Lough Corrib SAC is considered very sensitive to affect.

The area is predominantly low intensity agriculture and commercial forestry with some peat extraction.

The Proposed Development is located in between the N84 and N17 national roads. The R333 regional road is located approximately 4km south of the Site, and the Site will be accessed from the R233. The immediate area is accessed by a network of local roads.

The nearest regional road is the R332 which is located approximately 2.45km northeast (straight line distance) of the Site. There are several local roads in the vicinity of the Site. The proposed development will have one main site entrance which will be used for both construction and operation as an access point from the L2234 public road. The main site entrance requires construction of a new access on the L2234 local road.

The L6483 is a local secondary road to the east of the Site which connects the L2234 at the crossroads located north of the proposed site entrance to the R332. The substation entrance is located on the L6100 local secondary road.

Roads leading to the site appear to be in reasonable condition, local roads generally being single lane with cut outs or passing lay-bys.

There appears to be some local opposition to the proposed wind farm. There is an active community group Kilconly-Caherlistrane Windfarm. They have held 10 clinics in community centres during October 2025.

A website https://shancloonwindfarmsid.ie/ has been set up by the developers as a source of information on the proposed development information and the EIAR outlined the community engagement that has been undertaken.

Table 5-2: Community Consultation

Timeline	Action
April 2023	Dedicated project website, email and phone line established First project information letter distributed 2km radius (231 houses) CLO went door to door on 12th, 13th and 14th of April 2023 and met with 89 householders April and May 2023: 37 emails were received and responded to by the development team
September 2023	Second project information letter distributed 2km radius (231 houses)
November 2023	Third project information letter distributed 2km radius (231 houses) CLO went door to door on 27th 28th and 29th November 2023 and met with 60 householders
June 2025	11th and 12th June 2025 - Public meetings held (morning and evening)

It is important that the developers keep updating the local community should this proposed development proceed.

General

The HSE is a statutory consultee under Article 28 of the Planning and Development Act 2000 (as amended) and has a remit to make observations on a planning application accompanied by an EIAR with regard to any likely significant effects on Public or Environmental Health. The NEHS can make observations on any planning application as a statutory consultee.

The objective of any observations by the NEHS are to inform the Planning Authority on any likely significant effects on Public or Environmental Health and give an opinion on any proposed mitigation to protect Public and Environmental Health. Any observations made are to inform and assist the decision making of the Planning Authority in the planning process.

This submission is the observations and comments of the NEHS based on the submitted planning application and the accompanying Environmental Impact Assessment Report (EIAR). The NEHS does not carry out any independent environmental monitoring or validation of any measurements or data reproduced in an EIAR.

Criteria for Consideration of Likely Significant Effects on Public Health

The NEHS considers likely significant effects on Public and Environmental Health as per the EPA issued National Guidance (known as the EIAR Guidance): ***Guidelines on the information to be contained in Environmental Impact Assessment Reports,*** 2022 https://www.epa.ie/publications/monitoring--assessment/assessment/EIAR_Guidelines_2022_Web.pdf

Particularly section 3 of the EIAR Guidance on Human Health which is reproduced below:

Human Health

The recitals to the 1985 and 2011 Directives refer to 'Human Health' and include 'Human Beings' as the corresponding environmental factor. The 2014 Directive calls this factor 'Population and Human Health'.

While no specific guidance on the meaning of the term Human Health has been issued in the context of Directive 2014/52/EU, the same term was used in the SEA Directive (2001/42/EC). The Commission's SEA Implementation Guidance states 'The notion of human health should be considered in the context of the other issues mentioned in paragraph (f)'. (Paragraph (f)[47] lists the environmental factors including soils, water, air etc). This is consistent with the approach set out in the 2002 EPA EIS Guidelines where health was considered through assessment of the environmental pathways through which it could be affected, such as air, water or soil, namely:

> 'The evaluation of effects on these pathways is carried out by reference to accepted standards (usually international) of safety in dose, exposure or risk. These standards are in turn based upon medical and scientific investigation of the direct effects on health of the individual substance, effect or risk. This practice of reliance upon limits, doses and thresholds for environmental pathways, such as air, water or soil, provides robust and reliable health protectors [protection criteria] for analysis relating to the environment.'

In an EIAR, the assessment of impacts on population & human health should refer to the assessments of those factors under which human health effects might occur, as addressed elsewhere in the EIAR e.g. under the environmental factors of air, water, soil etc.. The Advice Notes provide further discussion of how this can be addressed.

Assessment of other health & safety issues are carried out under other EU Directives, as relevant. These may include reports prepared under the Industrial Emissions, Waste Framework, Landfill, Strategic Environmental Assessment, Seveso III, Water Framework Directive, Floods or Nuclear Safety Directives[48]. In keeping with the requirement of the amended Directive, an EIAR should take account of the results of such assessments without duplicating them.

The NEHS therefore considers likely significant effects within a population and Human Health context that uses a source – pathway- receptor model, based on emissions through environmental media and population exposure. The exposure of populations, if any, is then considered against recognised health protection criteria.

Whilst EIAR Guidance recognises the requirement to identify sensitive receptors within the assessment process, the Planning Authority should be clear that it is within a Population health approach.

A Population Health approach to the sensitivity of receptors would not consider individual specific sensitivity of a human receptor, but the sensitivity of the established land use or service provision. For example, a school would be considered a sensitive receptor within a Population Health approach, but an individual student who was particularly sensitive to noise attending the school would not be specifically considered in the assessment criteria. A health care facility that provided services for people with recognised noise sensitivity would be considered in its entirety as a particular noise sensitive location.

The Population Health approach therefore has important differences in how likely significant effects on Population and Human Health are considered in EIA. The assessment should consider established land development and use and service provision and activities within communities and not individual members of communities.

It is recommended that the Planning Authority also follows this method when consider Public Health in their decision making.

Project Specific Guidance for Wind Energy Development

The current Guidelines for Wind Energy Development are: Wind Energy Development Guidelines (2006) https://www.gov.ie/en/publication/f449e-wind-energy-development-guidelines-2006/

It is recognised that the nature of wind energy development has significantly changed since the publication of these Guidelines. Particularly the size of the turbines and the proximity to centres of populations and the cumulative effects with other wind energy development. There has also been substantial increases in the body of knowledge around the likely significant effects of the operation of wind farm development on Population Health, in particular around the characteristic of the noise emissions and health effects of shadow flicker.

A revision of the 2006 GWED commenced in 2013 and Draft Revised Wind Energy Development Guidelines were issued in December 2019.
https://www.gov.ie/en/publication/9d0f66-draft-revised-wind-energy-development-guidelines-december-2019/
These are yet to be adopted.
The Revised WEDG 2013 states 'the revised guidelines will provide greater consistency of approach in planning for onshore wind energy development, as well as providing greater certainty and clarity to the planning system, to the wind industry and to local communities'

The NEHS is aware of the High Court decision in ***Webster/Rollo V Meenaclogher (Wind) Limited (2024 IEHC 136) 8th March 2024***, and details of the judgement. The judgement that the noise from the wind farm was a Private Nuisance is a predominately health based assessment, in that the elements that were deemed to create the nuisance were directly related to health effects on the complainants. It is the understanding of the NEHS that assessment of compliance with health protection conditions set in the consent process was not a material consideration in the judgement. The judge did state that she could consider nuisance irrespective of any compliance with consent conditions, particularly in the absence of up to date national Policy and Guidance in the area. The Judgement also states the revised Draft Guidance has been withdrawn. There is no public indication this is the case. It is still on the Department's website as of the date of this submission.

Nuisance from noise is fundamentally a subjective assessment based on 'reasonable' perception and reaction of the effects of the noise exposure. This perception and reaction depends on situational specific conditions and land use. This was recognised in the Judgement after 51 days of evidence and consideration of the specific facts. It also the understanding of the NEHS that the Judgement did not make an order as to the level or characteristic of the noise that would abate the nuisance.

If the Planning Authority are now considering that they are under a duty to incorporate the likelihood of a Private Nuisance into their decision making, then they should consider the judgement in ***Webster/Rollo V Meenaclogher (Wind) Limited (2024 IEHC 136) 8th March 2024.*** This judgement identified, in the absence of Irish Guidance, the usefulness of UK Guidance in the investigation of wind farm noise as a statutory nuisance. This is, of course, a reactionary methodology where specific noise exposure is known and not a predictive methodology for the likelihood of a Private Nuisance.
https://assets.publishing.service.gov.uk/media/5a795184e5274a3864fd5f82/pb-13584-windfarm-noise-statutory-nuisance.pdf

Non-Technical Summary

The Non-Technical Summary of the EIA (NTS) is an important document that facilitates public access and understanding of the proposed development.

It should accurately summarise the likely significant impacts, proposed mitigation and the residual impacts after mitigation has been implemented, that are attributable to the proposed development.

This should be done in non-technical language and relate accurately to the specific chapters of the EIAR. The NTS should identify all sensitive receptors that are likely to be significantly impacted and clearly state the significance of the effects on them.

Chapter 6 Population and Human Health

The NEHS has considered chapter 6 of the EIAR.

Consideration of Population and Human Health should be done in a proportionate manner that is specific to the proposed development and any likely significant effects the proposal might have on Population Health.

Observations of the NEHS

The main consideration for protection Population and Human Health within an Environmental and Public Health remit is a source – pathway- receptor with regard to emissions into the environment during construction and operation of the proposed development.

Particularly:

a) Any likely significant effect from exposure to noise during construction and operation
b) Any likely exposure to shadow flicker during operation,
c) Any likely significant reduction in air quality during construction, particularly dust emissions,
d) Protection of ground and surface water during construction activities from contamination with hydrocarbon spillages or sedimentary run off.

It is the opinion of the NEHS that the EIA has identified these areas for assessment, and they are reported in the EIAR.

The NEHS recommends the Planning Authority consider Chapter 6 in the context of our previous recommendations in this submission, i.e. emissions into the environment and exposure of populations to the emissions and an evaluation against recognised health protection standards

The following is noted from the EIAR

Should the project be granted permission, an operational noise survey will be undertaken to ensure the project complies with the noise limits once the windfarm is operational. In the unlikely event that an exceedance in the noise limit occurs, mitigation measures will be refined to ensure compliance with the noise limits is achieved at all noise sensitive locations, which are described within Chapter 8 - Noise and Vibration

In terms of perceived effects from shadow flicker and noise, a shadow flicker assessment has been conducted and is included in Chapter 13 of this EIAR and a Noise and Vibration assessment is included in Chapter 8.

In relation to shadow flicker, the developer commits to zero shadow flicker through the installation of shadow flicker monitoring and software management measures. In terms of noise, The closest property to a turbine (Eircode H54 KH73) is located c. 357 m distance from Turbine T01. However this property belongs to a landowner involved in the project, and is no longer in use as a residential residence, therefore, the layout and design of the wind farm complies with the current Wind Energy Development Guidelines, 2006, therefore, the operational wind farm noise levels meet the derived night and daytime noise limits at all residential properties surrounding the proposed Shancloon Wind Farm, excluding the involved receptor previously identified.

As detailed in Chapter 11 - Soils, Geology and Hydrogeology, a slope stability assessment was carried out at the Wind Farm site to investigate the lands for potential slope failure. Safety ratios for potential slope failures indicates that the slopes are considered stable in the long-term drainage conditions. Site investigation was conducted to investigate the presence of peat on site and in accordance with the Scottish Executive, *Best Practice Guide for Proposed Electricity Generation Developments* (2017), as peat deposits at the proposed turbine locations were <0.5m in depth a peat stability assessment was not undertaken. As such it is considered construction activities at these locations pose a potential risk to sensitive receptors from potential landslide/slope failures. However, results from the two site walkover surveys show no evidence of recent or historic landslides other than localized shallow peat failures.

No evidence of slope instability was observed at the site and there are no historical records of landslide activity within 1km of the site on the GSI database.

Mitigation by design has been incorporated into the Project to avoid potential effects from landslides. Mitigation measures for potential landslide/slope failure are set out in Chapter 11 - Soils, Geology and Hydrogeology. Mitigation measures relating to flood risk which could have a bearing on potential landslides are detailed in Chapter 12 - Hydrology and Water Quality & FRA.

During the construction phase of the Project, an emergency response plan will be in place as set out in Section 6 of the CEMP in the unlikely event of a landslide/slope failure.

It should be noted by the Planning Authority that the following ***'The HSE, in their 2017 report 'Position paper on wind turbines and public health'*** referenced in the EIAR has been withdrawn by the HSE and is under review.

Likely Significant Impact on Ground and Surface Water

The NEHS has considered Chapter 12 of the EIAR and the sections referenced. Based on the information provided in chapter 12, the NEHS would concur with the conclusions that there is adequate protection of surface and ground water during construction and operation of the proposed development if all the mitigation identified is implemented in full.

Consideration of Shadow Flicker

The EIAR clearly states the technology exists to reduce or eliminate shadow flicker where required. Chapter 13.

Observations of the NEHS

The draft 2019 Guidelines proposed a planning condition of:

The adopted DoEHLG 2006 Guidelines are currently under review. The Draft DoEHLG 2019 Guidelines recommend local planning authorities and/or An Bord Pleanála impose conditions to ensure that:

> *"no existing dwelling or other affected property will experience shadow flicker as a result of the wind energy development subject of the planning application and the wind energy development shall be installed and operated in accordance with the shadow flicker study submitted to accompany the planning application, including any mitigation measures required."*

The Draft DoEHLG 2019 Guidelines are based on the recommendations set out in the '*Proposed Revisions to Wind Energy Development Guidelines 2006 - Targeted Review*' (December 2013) and the '*Review of the Wind Energy Development Guidelines 2006 - Preferred Draft Approach*' (June 2017).

In the interest of the protection of public Health the proposed condition in the 2019 Draft Guidance should be implemented if consent is given for the development. The technology has advance since the publication of the 2006 Guidance and it is a reasonable health protection measure to be included in any conditioning of a wind farm development. The mitigation measures that will eliminate exposure to shadow flicker are identified in the EIAR. This mitigation should be implemented irrespective of whether the current guidance is updated.

Likely Significant Effects from Noise and Vibration (Chapter 8 of EIAR)

The NEHS has considered Chapter 8 of the EIAR and the accompanying documentation on the noise impact assessment and makes the following observations:

a) The 2006 Guidelines include guidance on how to derive noise limits for daytime and night-time periods, which can be summarised as: daytime limits take account of existing background noise levels and include a fixed limit of 45 dB, or background + 5 dB, whichever is the greater, except in low background noise environments where a fixed minimum limit in the range 35-40 dB should be considered.

b) This criteria is therefore that turbine noise at noise sensitive locations should not exceed for daytime periods:
40 dB(A) where background noise levels are below 30 dB; and,
45 dB(A) or background noise plus 5 dB, whichever is the greater, where background noise levels are greater than 30.

c) This criteria can potentially see a predicted increase of up to 15 dB(A) change in the noise environment as compliant with the criteria. Any change in the noise environment of this magnitude is highly likely to cause complaints and/or nuisance. ***BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound*** identifies an increase of 10 dB above existing rated noise levels will have a significant adverse impact and is highly likely to cause complaints.

d) From the 2006 Guidelines ***"However, in very quiet areas, the use of a margin of 5dB(A) above background noise at nearby noise sensitive locations is not necessary to offer a reasonable degree of protection and may unduly restrict wind energy developments which should be recognised as having wider national and global benefits. Instead, in low noise environments where background noise is less than 30dB(A), it is recommended that the daytime level of the LA90, 10min of the wind energy development be limited to an absolute level within the range of 35 – 40dB(A)."*** There is no evidence base to support the statement that this limit is not necessary to offer a reasonable degree of protection in low noise background areas.

e) The evaluation of significance of the effect should be based on the most up to date scientific knowledge and data. The EIA process specifically requires the assessment to be 'the likely significant effects' and if the knowledge on an evaluation criteria for significance has developed since the publication of a guidance, then it is reasonable and correct to use the developed knowledge base in assessing the significance of any effect. This is particularly relevant to the protection of Public Health. Statutory Guidance issued under the Planning

Development Act 2000 (as amended) has to be considered by the Planning Authority when making a decision, but it is not a consideration that precludes all other evidence and knowledge. In in ***Webster/Rollo V Meenaclogher (Wind) Limited (2024 IEHC 136) 8th March 2024*** the Judgement supports this position, in that the judgement makes it clear that compliance with the current Planning Guidance does not preclude a private noise nuisance.

f) In the opinion of the NEHS, tabulation of the predicted change in the noise environment from the proposed development and the cumulative change in the original baseline noise environment before any wind farm development in the area is the most informative way of reporting the likely effect of operational noise in an EIAR.

g) The NEHS would consider the most appropriate criteria for assessing significance of the predicted noise would be consideration of the ***ENVIRONMENTAL NOISE GUIDELINES for the European Region, 2018*** The 2018 WHO Guidance set health protection levels from environmental noise.https://iris.who.int/bitstream/handle/10665/279952/9789289053563-eng.pdf?sequence=1

h) The use of the 2006 Guidance with regards to noise exposure, and in particular the 'balance between development and protection of public health' stated are resulting in a significant volume of complaints from communities exposed to noise from wind turbines post development. This position that the absolute noise exposure limits set in the 2006 Guidance do not necessarily protect Public Health in specific development situations is now supported by Judgements of the Irish Courts, as reference previously in this submission.

i) It should also be noted that the EIAR states with regard the draft 2019 Guidelines that '***EIAR considered the application of other noise guidelines. However, the Draft Revised Wind Energy Development Guidelines, published in December 2019 which is the most recent publication from the Department of Housing, Planning and Local Government have a number of technical errors, ambiguities and inconsistencies and requires further detailed review and amendment. This is a fact widely accepted by noise experts in Ireland. The final version of this document has not been published, at this time. In assessing the draft Guidelines, the WHO 45 dB Lden noise criterion was considered. The WHO document is based on a very limited data set, which only estimated the Lden for the sites studied, rather than assessing it directly from wind statistics. Furthermore, the WHO recommendation is "conditional"***'. 'These concerns were in fact due to assessment methodology and not the proposed standards set to protect health. In the response from the Institute of Acoustics they specifically state: ***'The Group agreed and stressed in their responses that they believe the setting of suitable noise limits is a matter for Government policy. The Group was only concerned with aspects of technical accuracy and clarity'.***

Wind Energy Development Guidelines (WEDG) for consultation for Irish Department of Housing, Planning, Community and Local Government (DHPLG) | Institute of Acoustics

The changing of some of the absolute noise exposure limits at NSLs from a limit based on a low background to a non-low background at increased wind speeds increases the criteria for noise exposure limits.

If the wind turbine noise is the predominate noise source then the control of the level of noise exposure to protect health should be the same whatever the background level is. If the background level becomes the predominate noise source at higher wind speeds, then the wind turbine noise does not need controlling. There is no reasonable rationale on health protection grounds to increase the absolute noise exposure limit because the background level has increased, if the wind turbine noise is still the dominant noise source.

Table 8-22: Assessment of Predicted LA90 noise levels for Shancloon Windfarm for the N149 turbine

Noise Monitoring Location/Receptor ID	Description	Predicted LA90 Sound Pressure Level at 10m Standardised Wind Speed, dB					
		3 m/s	4 m/s	5 m/s	6 m/s	7 m/s	8 m/s
N1/R210	Predicted Level	27.5	28.7	33.1	37.4	38.9	39
	Daytime limit	40	40	40	40	45	45
	Daytime Excess	-	-	-	-	-	-
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-
N2/R226	Predicted Level	25.7	26.9	31.2	35.7	37	37.2
	Daytime limit	40	40	40	40	45	45
	Daytime Excess	-	-	-	-	-	-
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-
N3/R215	Predicted Level	26.6	27.8	32.2	36.6	38	38.2
	Daytime limit	40	40	40	40	40	45
	Daytime Excess	-	-	-	-	-	-
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-
N4/R198	Predicted Level	28.3	29.5	33.9	38.2	39.7	39.8
	Daytime limit	40	40	40	40	45	45
	Daytime Excess	-	-	-	-	-	-

Noise Monitoring Location/Receptor ID	Description	Predicted LA90 Sound Pressure Level at 10m Standardised Wind Speed, dB					
		3 m/s	4 m/s	5 m/s	6 m/s	7 m/s	8 m/s
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-
N5/R187	Predicted Level	29.9	31.1	35.6	39.8	41.4	41.5
	Daytime limit	40	40	40	40	45	45
	Daytime Excess	-	-	-	-	-	-
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-
N6/R183 (landowner)	Predicted Level	35.4	36.6	41.2	45.1	47	47.1
	Daytime limit	40	40	40	40	45	45
	Daytime Excess	-	-	1.2	5.1	2.0	2.1
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	2.1-	4.0	4.1
N7/R217	Predicted Level	26.4	27.6	32	36.4	37.8	37.9
	Daytime limit	40	40	40	45	45	45
	Daytime Excess	-	-	-	-	-	-
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-
N8/R222	Predicted Level	26	27.2	31.6	36	37.4	37.5
	Daytime limit	40	40	40	40	45	45

Noise Monitoring Location/Receptor ID	Description	Predicted LA90 Sound Pressure Level at 10m Standardised Wind Speed, dB					
		3 m/s	4 m/s	5 m/s	6 m/s	7 m/s	8 m/s
	Daytime Excess	-	-	-	-	-	-
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-
N9/R184	Predicted Level	31	32.2	36.7	41	42.5	42.6
	Daytime limit	40	40	40	40	45	45
	Daytime Excess	-	-	-	1	-	-
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-
N9/R185	Predicted Level	30.3	31.5	36	40.3	41.8	41.9
	Daytime limit	40	40	40	40	45	45
	Daytime Excess	-	-	-	0.3	-	-
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-
N10/R196	Predicted Level	28.5	29.7	34.0	38.4	39.8	40.0
	Daytime limit	40	40	40	45	45	45
	Daytime Excess	-	-	-	-	-	-
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-
	Predicted Level	27.6	28.8	33.2	37.6	39	39.1

Noise Monitoring Location/Receptor ID	Description	Predicted LA90 Sound Pressure Level at 10m Standardised Wind Speed, dB					
		3 m/s	4 m/s	5 m/s	6 m/s	7 m/s	8 m/s
N11/R207	Daytime limit	40	40	40	40	45	45
	Daytime Excess	-	-	-	-	-	-
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-
N12/R232	Predicted Level	25.5	26.7	31	35.5	36.8	37
	Daytime limit	40	40	40	40	45	45
	Daytime Excess	-	-	-	-	-	-
	Night-time limit	43	43	43	43	43	43
	Night-time Excess	-	-	-	-	-	-

Consideration of the predicted noise exposure from construction of the proposed development

The NEHS makes the following comments:

a) The NEHS is of the opinion that there is no requirement for additional noise mitigation measures during the construction phase providing those measures identified in the in the EIAR are implemented in full.

b) It is the opinion of the NEHS that conditioning hours of construction activity is an important element of the protection of Public Health. Particularly to prevent sleep disturbance. The recommended hours of construction are:

Monday to Friday 08.00 to 19.00
Saturday 09.00 to 14.00
No work on Sunday or Bank Holidays

Exceptionally work outside these hours at the express permission of the Planning Authority.

This recommendation is made in the interest of the protection of Public Health

Mitigation and Monitoring

The NEHS has considered the proposed mitigation and monitoring detailed in the EIAR, in the context of the protection of Public and Environmental Health and the Construction and Environmental Management Plan in Appendix 2 and the surface water management plan in appendix 12.2 of the EIAR. The NEHS is of the opinion that if the mitigation measures are implemented in full there is adequate protection of Public and Environmental Health during the proposed construction phase.

Construction and Environmental Management Plan (CEMP)

The NEHS has considered the CEMP in Appendix 2.1
The plan is detailed and it is the opinion of the NEHS that there is adequate protection of Public and Environmental Health during the construction phased if all mitigation measures identified are implemented in full.

Additional considerations in the interest of the protection of Public Health:

a) All drinking water and water used for the preparation of food in the temporary construction compounds should meet the requirements of S.I. No. 122/2014 - European Union (Drinking Water) Regulations 2014,
b) There should be no direct emission to ground or surface water of any foul wastewater. All waste water should be contained and taken off site to a licensed treatment facility.
c) Site drainage should ensure the protection of surface and ground water during the construction phase. These are detailed in the CEMP and the NEHS has no additional comments.
d) The dust monitoring is a monthly average standard. Compliance with standard can incorporate short periods of very high levels of dust deposition followed by low levels and still be compliant. It is therefore important that dust minimisation is continually implemented, and any complaints are investigated and responded to.

The NEHS has no additional observations on the proposed mitigation measures and considers there will be adequate protection of Public and Environmental Health during the construction phased if all mitigation measures identified are implemented in full.

Andrew Salley
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