

Honor Caird Marren

From: Andrew Sulley <Andrew.Sulley@hse.ie>
Sent: Monday 8 December 2025 14:30
To: SIDS
Subject: RE: HSE observations on SID PAX91.323780
Attachments: NEHS Observations PAX91.323780(NEHS ref 5306) WF ballinlee WF Limerick.pdf
Categories: Honor

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Thank you for the new request,

I have enclosed the submission dated and signed today.

Regards,


Andrew Sulley
Senior Environmental Health Officer

Oifigeach Sláinte Comhshaoil Sinsearach/Senior Environmental Health Officer
Tímeallacht Athrú Aeráide Aonad Tacaíochta Líonra/Environment Climate Change Network Support Unit

Seirbhís Náisiúnta Sláinte Comhshaoil, FSS/ National Environmental Health Service, HSE
Holland, Páirc Theicneolaíochta Plassey, Luimneach/ Holland Road, Plassey Technological Park, Limerick

From: SIDS <sids@pleanala.ie>
Sent: Monday 8 December 2025 13:57
To: Andrew Sulley <Andrew.Sulley@hse.ie>
Subject: RE: HSE observations on SID PAX91.323780

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Andrew,

Unfortunately, the submission you emailed has been deemed invalid. However, please see attached letter for a new request for a submission regarding the above-mentioned case.

Kind regards,

Honor

From: Andrew Sulley <Andrew.Sulley@hse.ie>
Sent: Wednesday 3 December 2025 14:59
To: SIDS <sids@pleanala.ie>
Subject: FW: HSE observations on SID PAX91.323780

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Reference is made to my e-mail below on 27th November. I have enclosed observations for SIS PAX19.323780 if you can facilitate consideration of them in your decision making.

Regards


Andrew Sulley
Senior Environmental Health Officer

From: Andrew Sulley
Sent: Thursday 27 November 2025 15:02
To: SIDS <sids@pleanala.ie>
Subject: HSE observations on SID PAX19.323579 and PAX91.323780

The HSE have prepared observations on the following SID WF developments. The specified time for submissions has past, though the decision dates are September 2026. Previously communication with your office has informed the HSE that observations cannot be received past the specified date. This was confirmed in a telephone conversation with your office today, 27th November, 2025. The HSE was notified that the observations can only now be received if a request is made to the HSE by ACP with a specified date of at least 14 days from the date of such a request and the HSE observations are received within that time-period.

If ACP consider it beneficial to their decision making to make that request then the HSE observations can be made by return.

An Coimisiún Pleanála - Case reference: PAX91.323780

10 year planning permission for Ballinlee Wind Farm consisting of 17 no. wind turbines, a permanent 110kV substation and ancillary development located in Ballincurra, Ballingayrou, Ballinlee North & South, Ballinrea, Ballyreesode, Camas North & South, Carrigeen, Knockuregare, Ballybane and other townlands in County Limerick.


Andrew Sulley
Senior Environmental Health Officer

Oifigeach Sláinte Comhshaoil Sinsearach/Senior Environmental Health Officer
Tímpeallacht Athrú Aeráide Aonad Tacaíochta Líonra/Environment Climate Change Network Support Unit

Seirbhís Náisiúnta Sláinte Comhshaoil, FSS/ National Environmental Health Service, HSE
Holland, Páirc Theicneolaíochta Plassey, Luimneach/ Holland Road, Plassey Technological Park, Limerick

"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil . Seains gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúl don Deasc Seirbhísí ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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"Tá an fhaisnéis sa ríomhphost seo (ceangaltáin san áireamh) faoi rún. Baineann sé leis an té ar seoladh chuige amháin agus tá sé ar intinn go bhfaighfidh siadsan amháin é agus gurb iadsan amháin a dhéanfaidh breithniú air. Más rud é nach tusa an duine ar leis é, tá cosc iomlán ar aon fhaisnéis atá ann, a úsáid, a chraobhscaoileadh, a scaipeadh, a nochtadh, a fhoilsiú, ná a chóipeáil . Seains gurb iad tuairimí pearsanta an údar atá san ríomhphost agus nach tuairimí FSS iad.

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An tOifig Náisiúnta um Sláinte Chomhshaoil
Feidhmeannacht na Seirbhíse Sláinte,
Urlár 2, Teach na Darach, Ascaill na Teile
Páirc na Mílaoise, An Nás, Co. Chill Dara.

National Office for Environmental Health Services
2nd Floor, Oak House, Lime Tree Avenue
Millennium Park, Naas, Co. Kildare
Eircode: W91KDC2

An Coimisiun Pleanála
64 Marlborough Street
Dublin 1

8th December 2025

Planning ref [PAX91.323780](#)

NEHS ref: ID5252

Enclosed are the observations of the National Environmental Health Service (NEHS) on planning application [An Coimisiún Pleanála - Case reference: PAX91.323780](#)

Proposed Windfarm development of 10 year planning permission for Ballinlee Wind Farm consisting of 17 no. wind turbines, a permanent 110kV substation and ancillary development

Any clarification on the contents of this submission should be made, in the first instance Andrew.sulley@hse.ie quoting NEHS ID5306.


Andrew Sulley
Senior Environmental Health Officer



National Environmental Health Service Submission Report

Description

10 year planning permission for Ballinlee Wind Farm consisting of 17 no. wind turbines, a permanent 110kV substation and ancillary development

Case type

Private Development - REDIII Application

Decision

Case is due to be decided by 28/9/26

Type of Consultation: SID with EIAR

The following HSE stakeholders were notified of the application on 2nd October 2025:

- Emergency Planning
- National Capital Estates Office
- Director of National Health Protection
- REO Mid-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

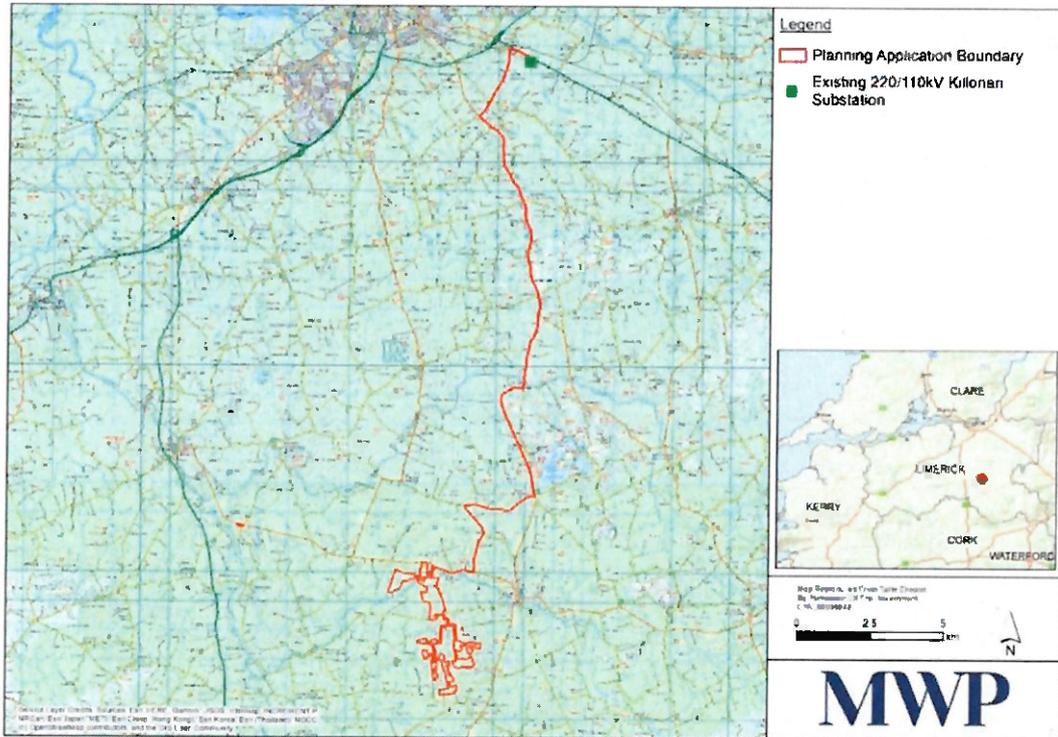


Figure 5-1: Location of the Proposed Development

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 Directives⁴⁸. 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 5 Population and Human Health

The NEHS has considered chapter 5 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 5 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

Table 5-2: Potential Disturbance & Health and Safety Issues and Relevant EIAR Chapters

Potential Disturbance / Health & Safety Issue	EIAR Chapter
Dust emissions from construction/decommissioning activities	Chapter 10 Air Quality
Noise emissions during construction/decommissioning and operation	Chapter 13 Noise and Vibration
Public safety during construction/decommissioning activities and operation	Chapter 2 Description of the Proposed Development
Traffic disturbance during construction/decommissioning and operation	Chapter 16 Material Assets – Traffic and Transportation
Visual impacts during operation	Chapter 12 Landscape and Visual
Shadow flicker during operation	Chapter 15 Shadow Flicker

From the EIAR

5.2.1.3 Consultation

Ballinlee Green Energy Ltd. has undertaken a consultation process with the local community. In line with national policy, Ballinlee Green Energy Ltd. is committed to transparent and meaningful consultation. This facilitates more informed and active engagement with the proposed development. A dedicated website has also been set up to allow those with queries to easily access information about the project, and contact should they have any questions, <https://ballinleegreenenergy.ie>. Activities of public engagement carried out to this stage of the proposed development are detailed in Volume II, Chapter 01 Introduction of this EIAR, and the Community Consultation Report found in Volume III, Appendix 1C of this EIAR

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

Likely Significant Impact on Ground and Surface Water Chapter 9 of EIAR

The NEHS has considered Chapter 9 of the EIAR and the sections referenced. Based on the information provided in chapter 9 and particularly the surface water management plan detailed in appendix 2e Vol III.

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 – chapter 15

The EIAR clearly states the technology exists to reduce or eliminate shadow flicker where required. Chapter 15.

The NEHS notes from section 15.7.2.1 that there is a commitment to use technology to comply with the 2006 WEDGs and if the draft 2019 Guidelines are adopted to comply with no shadow flicker condition proposed in the draft 2019 Guidelines..

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 13 of EIAR)

The NEHS has considered Chapter 13 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 ***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 be noted that concern with the 2019 draft guidance by acoustic consultants were concerns 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'***.
- j) [Wind Energy Development Guidelines \(WEDG\) for consultation for Irish Department of Housing, Planning, Community and Local Government \(DHPLG\) | Institute of Acoustics](#)

13.3.1 Health Service Executive (HSE) Public Health Medicine Environment and Health Group

In Ireland the HSE Public Health Medicine Environment and Health Group drafted a position paper in 2017 titled Position Paper on Wind Turbines and Public Health. The group identified that there is no published scientific evidence to support adverse effects of wind turbines on health and concluded that:

"Published scientific evidence is inconsistent and does not support adverse effects of wind turbines on health. However, adequate setback distances and meaningful engagement with local communities are recommended in order to address public concern."

It should be noted by the Planning Authority that this position paper has been withdrawn and is currently under review.

It should also be noted that this refers to adverse effects **specific** to wind turbines. All large-scale development has potential to have adverse effects, including wind turbines.

Predicted Operational Noise

The NEHS notes that the table of predicted noise at NSL is in Appendix 32G of predicted noise exposure and the adopted criteria for the protection of health. The NEHS also notes the 6 NSL predicted to be exposed to Noise above the adopted criteria, 3 of which have a financial interest in the development.

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 chapter 19, in the context of the protection of Public and Environmental Health and the Construction and Environmental Management Plan in Appendix 2A and the surface water management plan in 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.A

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. The NEHS notes the following from the EIAR:

9.3.1.4. Temporary Construction Compounds and Welfare Facilities

Three (3) No. temporary construction compounds will be set up upon commencement of the construction phase.

The compound will be used as a secure storage area for construction materials and will also contain temporary site cabins to provide welfare facilities for site personnel. Facilities will include office space, meeting rooms, canteen area and mobile sanitary facilities.

The proposed development will include an enclosed wastewater management system at the temporary compound capable of handling the demand during the construction phase. The discharge from the toilet within each building will go to a holding tank where the effluent will be temporarily stored and removed at regular intervals by an approved contractor and disposed of in a licenced facility.

Upon completion of the project the compound will be decommissioned by backfilling the area with the material arising during excavation and landscaping with topsoil.

9.3.1.5. Water Supply

Water needs for construction activities will be limited to potable water, concrete truck chute washing, wheel wash and dust suppression. This water requirement will be imported to the site in bulk and stored at temporary compounds. There will also be a very small water requirement for welfare facilities (i.e., toilet flushing and hand washing). It is estimated that up to approximately 3,000 litres per day of potable water will be required during peak construction for 80no. construction employees. It is proposed that this water requirement will be imported in bulk water tanks.

- 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
Senior Environmental Health Officer