Niamh Hickey

From:	Communications
Sent:	Wednesday 17 December 2025 17:07
To:	Marine
Subject:	FW: ACP-323821-25 NEHS Submission
Attachments:	20251217_161349.pdf
Categories:	Niamh Case

Kind regards
Shane

Shane Larkin
Communications Department
An Coimisiún Pleanála

-----Original Message-----
From: Marie Dowling <marie.dowling@hse.ie>
Sent: Wednesday, December 17, 2025 4:25 PM
To: sid@pleanala.ie; Bord <bord@pleanala.ie>
Subject: ACP-323821-25 NEHS Submission

[You don't often get email from marie.dowling@hse.ie. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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.

Dear Sir/Madam,
Please find attached NEHS Submission for EIAR application ACP-323821-25.
Kindly acknowledge receipt of email and attached document.
Regards

Marie Dowling
Environmental Health Officer | Oifigeach Sláinte Chomhshaoil National Environmental Health Service, HSE West, St Mary's Health Centre, Parnell Street, Thurles, Co. Tipperary.
An Seirbhís Náisiúnta Sláinte Comhshaoil, FSS an Iarthar, Ionad Sláinte Naomh Muire, Sráid Pharnell, Durlas,Thiobraid Árann
Mobile - 087 4055418 E.mail - marie.dowling@hse.ie

"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 iúil don Deasc Seirbhísí ECT ar an nguthán ag +353 818 300300<tel:%2B353%20818%20300300> nó ar an ríomhphost chuig service.desk@hse.ie<mailto:service.desk@hse.ie> agus ansin glan an ríomhphost seo ded' chóras."

"Information in this email (including attachments) is confidential. It is intended for receipt and consideration only by the intended recipient. If you are not an addressee or intended recipient, any use, dissemination, distribution, disclosure, publication or copying of information contained in this email is strictly prohibited. Opinions expressed in this email may be personal to the author and are not necessarily the opinions of the HSE.

If this email has been received by you in error we would be grateful if you could immediately notify the ICT Service Desk by telephone at +353 818 300300<tel:%2B353%20818%20300300> or by email to service.desk@hse.ie<mailto:service.desk@hse.ie> and thereafter delete this e-mail from your system"

HSE National Environmental Health Service,
Civic Offices, Limerick Road, Nenagh, Co. Tipperary
E45A099

FSS Seirbhís Naisiunta Sláinte Comhshaoil,
Oifigí na Cathrach, Bóthar Luimnigh,an tAonach, Co. Thiobraid Arann
E45A099

Phone: 067 46602

An Coimisiún Pleanala,
64 Marlborough Street,
Dublin 1
D01 V902

Date:	17th December 2025
Name:	An Coimisiún Pleanala
Re:	EIAR
Proposed development:	110kV substation and associated cabling
Applicant:	Burrios Limited
EHIS Reference:	EHIS 5439
Planning Reference No.	ACP-323821-25

Dear Sir/Madam,

Please find enclosed the HSE Consultation Report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development on 13th November 2025

- Emergency Planning
- National Capital Estates Office – Regional AND
- Director of National Health Protection
- REO Mid- West

If you have any queries regarding this report please contact Anne Moriarty, Principal Environmental Health Officer, North Tipperary in the first instance at anne.moriarty1@hse.ie

Yours sincerely

Anne Moriarty
Principal Environmental Health Officer

National Environmental Health Service Submission Report
(as a Statutory Consultee under the Planning and Development Acts 2000 (as amended)& Regulations made thereunder)

Date: 17th December 2025

Type of consultation: EIAR

Application Reference Number: ACP 323821-25

EHIS Reference number: 5439

Applicant: Buirios Limited

Proposed Development: 110kV substation and associated cabling (Borrisbeg Grid Connection)

Dear Sir/Madam

Please find below the HSE submission report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development:

- Emergency Planning
- National Capital Estates Office – Regional AND
- Director of National Health Protection
- REO Mid- West

1. Introduction

The National Environmental Health Service (NEHS) submission report is based on an assessment of documentation submitted to this office on November 13th 2025.

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

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 considering Public Health in their decision making.

2. Description of the Project and Physical Environment

The project is a proposed grid connection to serve a consented wind farm. The wind farm known as Borrisbeg Wind Farm was consented under Planning Reference ABP: 318704 and comprises 9 no. wind turbines with an estimated installed generating capacity of 63MW.

The applicant, Buirios Limited, is seeking a 10 year planning permission for the proposed development briefly described in the Non-Technical Summary of the EIAR as

- A 110 kilovolt (kV) 'loop-in/loop-out' Air-Insulated Switchgear (AIS) electrical substation, including 2 no. single-storey control buildings with staff welfare facilities, underground wastewater storage tank, all associated electrical plant, cabling, equipment and apparatus, and security fencing, within a substation compound with a total footprint of approximately 1.41ha;
- 2.1 kilometre 110kV underground cabling route, with 0.9km following the public road corridor and 1.2km along new proposed access track across agricultural grassland (including joint bays, communication and earth sheath link chambers and all ancillary works along the route);
- 2 no. lattice-type end masts with a height of 16 metres to facilitate connection to the existing 110kV Ikerrin-Thurles overhead electricity transmission line;

- 1 no. temporary construction compound (including offices and staff welfare facilities);
- Vegetation removal and Spoil Management;
- Site Drainage; and
- All ancillary works and apparatus.

3. Assessment of Public Consultation:

Reference to public consultation could not be found in the EIAR.

The National Environmental Health Service (NEHS) recommends that there is engagement with the local community as early as possible and in particular during the construction phase. This may include a focal point person such as a Community Liaison Officer (CLO) where feedback including complaints can be received and acted upon.

4. Assessment of Non-Technical Summary:

The Non-Technical Summary was deemed adequate.

5. Population and Human Health

Chapter 4 of the EIAR address Population and Human Health and states that it "identifies, describes, and presents an assessment on the likely significant effects for the Proposed Grid Connection on Population and Human Health during both the construction and operational phases of the development."

In the Non-Technical Summary the issues of population and human health relevance considered are:

- Air Quality – Dust, CO_2, and other noxious elements
- Water Quality
- Noise and Vibration
- Traffic and Transport (Emissions)

Vulnerability to Major Accidents and Natural Disasters is referred to as being addressed separately under Chapter 6.

One topic not covered under this chapter is Climate. Climate Change is widely regarded by the World Health Organisation and others as the greatest threat to global health in the 21st century and therefore comment on this subject is included under the Climate heading.

More detailed comment with respect to the most relevant Population and Human Health issues is provided under each of the following aspects.

Air Quality

Chapter 9 of the EIAR assesses the likely significant effects on air quality associated with the Proposed Grid Connection.

Under the section zone of influence the section states that the "impacts to air quality during the Construction Phase of the Proposed Grid Connection will be as a result of construction dust and exhaust emissions.

Further in the chapter it states "due to the nature of the Proposed Grid Connection, it is unlikely for there to be any significant emissions to the atmosphere during the Operational Phase."

The primary source of air quality impacts relevant to the proposed development relate to dust emissions during the construction phase. The EIAR identifies a number of human sensitive receptors within 250 metres of the proposed development. 12 sensitive receptors are identified with 6 of those within 50 metres of the proposed development.

A number of Mitigation and Monitoring Measures for the Construction Phase are set out under Section 9.4.2 of the Chapter for both exhaust emissions and dust including emissions related to transport to and from the site.

The assessments conclude that the residual effects from the construction and operation phases of the Proposed Grid Connection are not significant.

The NEHS recommends that the mitigation measures described under Section 9.4.2 of the EIAR, in relation to the construction phase are set as minimum conditions of planning if permission is granted. Additional measures not listed may include a wheel wash for HGVs exiting the site, covering of loads and covering of soil stockpiles that may be on site.

Climate

Chapter 10 of the EIAR states that it identifies, describes and presents an assessment on the likely significant effects of the proposed development on climate during the construction and operational phases. The assessment includes a Climate Change Risk Assessment (CCRA) to identify the vulnerability of the proposed development to climate change and a Greenhouse Gas (GHG) Assessment which assesses the impact of the Proposed Grid Connection on climate during the construction and operation phases.

As stated earlier Climate Change is of significance to population health and actions to mitigate or reduce green-house gases and adapt to climate change have implications for public health both locally and globally due to the transboundary nature of climate change.

In the construction phase a key way to reduce emissions is related to the embodied carbon associated with the construction materials used and activities employed to build the proposed development. This is recognised in the EIAR.

Section 10.5 Description of the Likely Significant Effects spells out a number of mitigation actions to mitigate and adapt to climate change in both the construction and operational phases. A significant emission reduction or mitigation option will be the sourcing and utilisation of low carbon intensive construction materials.

In the context of adaptation for example the proposed development takes into account the potential flood risk, modelled well into the future.

The NEHS recommends the adoption of mitigation measures outlined in the Chapter under Section 10.5 and further detailed in the Construction Environmental Management Plan. Consideration should be given to the use of vehicles, plant and machinery that do not utilise fossil fuels.

Noise and Vibration

Chapter 11 of the EIAR assesses the likely noise and vibration effects of the proposed development. The assessment is of most relevance to the construction phase only.

Six noise monitoring locations were selected for the baseline noise assessment and are listed under table 11-6 of the chapter. As stated in the chapter the potential effects stem from construction activities and increased traffic movements in and out of the site during the construction period. The nearest Noise Sensitive Location (NSL) identified is 148 metres to the south east of the proposed substation.

The assessment concludes there will be no significant noise impacts from the construction of the substation, therefore no specific mitigation measures will be required. The same chapter also states the contractor can comply with current best practice guidance to minimise any significant noise and vibration impacts.

Five NSLs are identified as being within 10 – 20 metres from the underground cabling aspect of the construction phase. It is stated in the EIAR that the short period of time for activities near each NSL determines the effect is not significant.

One issue to highlight as a mitigation measure is the anticipated construction hours which are listed as 0700hrs – 1900hrs Monday – Saturday. The Saturday hours could be shortened to 1400hrs as a finish time.

In order to comply with best practice guidance to minimise any significant noise and vibration impacts a number of mitigation measures are proposed under Section 11.5 of the chapter. They are listed as:-

1. Selection of quieter plant
2. Noise control at source
3. Liaison with the public and
4. Project programme

The NESH recommends for construction phase that the noise mitigation measures proposed under Section 11.5 of the EIAR are adopted as minimum conditions of planning if permission is granted. The operational hours

proposed should be reconsidered to finish at 1400hrs on a Saturday with no construction work taking place on Sundays and Public Holidays.

6. Conclusions

Should permission be granted for the proposed development, the National Environmental Health Service makes the following recommendations:

- **That there is engagement with the local community as early as possible and in particular during the construction phase. This may include a focal point person such as a Community Liaison Officer (CLO) where feedback including complaints can be received and acted upon.**

- **Under the area of Air Quality that the mitigation measures described under Section 9.4.2 of the EIAR, in relation to the construction phase are set as minimum conditions of planning if permission is granted. Additional measures not listed may include a wheel wash for HGVs exiting the site, covering of loads and covering of soil stockpiles that may be on site.**

- **Under the area of Climate the adoption of mitigation measures outlined in the Chapter under Section 10.5 and further detailed in the Construction Environmental Management Plan. Consideration should be given to the use of vehicles, plant and machinery that do not utilise fossil fuels.**

- **In the area of Noise and Vibration for construction phase that the noise mitigation measures proposed under Section 11.5 of the EIAR are adopted as minimum conditions of planning if permission is granted. The operational hours proposed should be reconsidered to finish at 1400hrs on a Saturday with no construction work taking place on Sundays and Public Holidays.**

If you have any queries regarding any of the report, the initial contact is Anne Moriarty, Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours sincerely,

Niall Roche	Anne Moriarty
Niall Roche	Anne Moriarty
Network Support Unit Member	Principal Environmental Health Officer