

Lauren Murphy

From: Kathleen Lydon <Kathleen.Lydon@hse.ie>
Sent: Thursday 14 May 2026 13:56
To: SIDS
Subject: Planning Reference No.: ACP-324155-26 EHIS Consultation 5859
Attachments: Final EH 5859 NEHS Submission Report for Proposed Cahermurphy West Windfarm Co Clare.pdf

Categories: Lauren

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Dear Sir/Madam,

Please see attached the Final National Environmental Health Service Submission Report for Proposed Cahermurphy West Windfarm, Co. Clare.

Kind regards,

Kathleen Lydon
Principal Environmental Health Officer /Príomhoifigeach Sláinte Comhshaoil, An tSeirbhís Sláinte Comhshaoil Náisiúnta, Feidhmeannacht na Seirbhíse Sláinte, Ionad 6, Páirc hNó Bothar Chuinche, Inis, Co. an Chláir V95 YT73

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14th May 2026

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
www.pleanala.ie

Case Reference: ACP-324155-26

HSE ref: 5859

To whom it may concern,

Enclosed are the observations of the National Environmental Health Service (NEHS) on planning application Case Reference: ACP-324155-26.

Any clarification on the contents of this submission should be made, in the first instance, to the Principal Environmental Health Officer, Clare

Kathleen Lydon
Principal Environmental Health Officer

National Environmental Health Service Submission Report
(as a Statutory Consultee under Article 28 of the Planning and Development Act 2000 (as amended) & Regulations made thereunder)

Date: 14th May 2026

Type of consultation: Strategic Infrastructure Development (SID) accompanied by Environmental Impact Assessment Report (EIAR)

Planning Reference No.: ACP-324155-26

EHIS Reference No: 5859

Report to: An Coimisiún Pleanála

Applicant: MKO Planning Consultant on behalf of Cahermurphy Renewables
DAC

Description of Proposed Development:

Construction of the Cahermurphy West Wind Farm consisting of eight wind turbines, associated infrastructure and ancillary works in Cahermurphy and adjacent townlands in Co. Clare

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 on the 16th April 2026:

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

1. Introduction

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 Health. The National Environmental Health Service (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 of any likely significant effects to Public 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.

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 including mitigation and further testing have been taken as read and all data results have been accepted as accurate.

- No additional investigations/measurements were undertaken by the NEHS.
- This report refers only to those sections of the application documents that are relevant to the NEHS which have likely significant Environmental Health or Public Health Impacts.

2. Description of the Proposed Project

The Cahermurphy West Wind Farm in Co. Clare aims to develop an onshore wind energy project with associated infrastructure at Cahermurphy and adjacent townlands in Co. Clare.

The project involves the construction of eight wind turbines with a (tip height 180-185m, rotor diameter 149-163m, hub height 98.5-110.5m) including all associated foundations and hardstanding areas. New roads will be constructed including a single main site entrance, access roads and entrances including the upgrade of existing site roads. Temporary works will be carried out along roads to facilitate turbine delivery. A permanent 110kV electrical substation will also be constructed along with a wind farm control building and associated ancillary works.

A permanent 100 metre above ground level meteorological mast will be erected in order to measure meteorological conditions.

For the construction phase, two borrow pits will be developed. Two temporary construction compounds with associated ancillary infrastructure (site offices, staff facilities and car parking facilities) will be constructed and removed at the end of the construction phase.

Underground electrical and communication cabling will be installed connecting turbines to the substation and electrical cabling for 110kV grid connection. Development of biodiversity enhancement areas, peat and spoil management systems, site drainage, signage installation, and habitat enhancement measures.

Deforestation of an area of 56.3ha will be carried out as part of this development. The project seeks a 10-year planning permission with a 35-year operational life.

Scoping for this development was carried out by the NEHS in May 2024.

3. Site Location and Site Visit by NEHS

A visit to the site of the proposed was carried out by a local Environmental Health Officer on 7th May 2026. The purpose of the site visit was to identify any sensitive receptors where there could be a likely significant effect from the proposed development and to consider if there could be cumulative impacts from existing or proposed development and to consider the characteristics of the surrounding environment. This was to enable informed observations on the EIA and the subsequent EIAR.

The proposed site is located in a sparsely populated rural area in southwest County Clare, approx. 24.5km southwest of Ennis. The village of Kilmihil is located approximately 4.3km south of the proposed site, Mullagh is 4.3km southeast of the site.

The area for the Proposed Wind Farm is characterised by hilly bog lands with commercial forestry and agriculture being the main land use. The proposed Wind Farm is adjacent to the existing Cahermurphy Wind Farm comprising of 4 wind turbines.

The Wind Farm Site is accessed via local roads from the R483 Regional Road, which travels north-south of the Wind Farm site, the R484 Regional Road which travels east-west between Kilmihil and Creegh and the L-2048 local road, which travels in a northeast-southwest direction between Kilmaley and Creegh. The Wind Farm site is served by a number of existing forestry tracks.

The proposed development is surrounded by local roads, some of them unnamed. The roads are narrow. It was evident that the majority of roads in the area were resurfaced in recent times during the development of the existing Cahermurphy Wind Farm. There are a few pull-in laybys available in the event of meeting oncoming traffic.

There are a number of existing windfarms in the area including Cahermurphy Wind Farm (adjacent to the proposed site), Kiltumper Wind Farm (4.5km East), Booltiagh (9km East), Crossmore Windfarm (14km East), Tullabrack Windfarm (16km South), Boolynagleragh Wind Farm (24km East) of the proposed site.

It was difficult to determine the exact siting of the 8 wind turbines so approximate distances are calculated from Cahermurphy. Some properties and facilities may be located closer to the individual turbines.

The nearest school is Cahermurphy National School; it is approximately 500m from the proposed site. Kilmihil National School, Kilmihil Community Pre-school and St Michaels Community College are situated in Kilmihil Village approx. 4.3km from the proposed site. Cree National School and Pre-school are situated in Cree Village approx. 4.7km from the proposed site.

Dwelling houses are situated in close proximity to the proposed turbines.

There are a number of private wells in the area, attached to some private dwellings and farms. Cahermurphy National School is connected to the public water supply. Doolough Lake is the source of both West Clare New and Old Regional Rural water supplies. Both water treatment plants are operated by Uisce Eireann. Both water treatment plants are approximately 6-7km from the proposed site.

There is no record of complaints received by NEHS regarding activities associated with the proposed development.

There was no outward evidence of opposition to the windfarm in the local area. However, there was an article published in the Irish Independent – Clare News on 30th April 2026 where Cahermurphy Area Community Group expressed their dissatisfaction on the restrictions to public participation in the planning process. The Group held a public meeting on the 7th May 2026 in Cree Community Centre to discuss potential impacts on local residents.

4. Non-Technical Summary

The Non-Technical Summary (NTS) of the EIA 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.

5. Public Consultation

According to Appendix 2-4 of the EIAR, Community Liaison Officers delivered an information brochure to all residents located within 2 kilometres of the proposed site. In August 2025 there was a Community Clinic held in Kilmihil Community Centre regarding the proposed Cahermurphy West Wind Farm. A media release was circulated 9 days in advance of the clinic

On 20th March 2026, notices were included on the Clare Champion and Irish Examiner newspapers.

There will be ongoing community liaison throughout the lifetime of the project, should approval be granted, with regular updates posted on the project website. A dedicated Community Liaison Officer will be contactable by email and phone, with their details available on the website.

The Draft Revised Wind Energy Development Guidelines (2019) state the following:
'In order to promote the observance of best practice, planning authorities should require applicants to prepare and submit a Community Report with their planning application and a condition on any subsequent planning permission should require developers to carry out the development in accordance with the approved Community Report'

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

6. Population Health and Human Health

Criteria for Consideration of Likely Significant Effects on Public Health

The NEHS considers likely significant effects on Public 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. The exception would be 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.

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.

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:

- Any likely significant effect from exposure to noise during construction and operation,
- Any likely exposure to shadow flicker during operation,
- Any likely significant reduction in air quality during construction, particularly dust and emissions,
- 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.

7. Likely Significant Impact on Ground and Surface Water

The applicant states the following:

- *The protection of the watercourses within and surrounding the site, and downstream catchments that they feed is of utmost importance in considering the most appropriate drainage proposals for the site of the Proposed Project. The Proposed Project's drainage design has therefore been proposed specifically with the intention of having no significant negative effect on the water quality of the site and its associated rivers and lakes, and consequently no significant effect on downstream catchments and ecological ecosystems*
- Measures to prevent peat and subsoil erosion during excavation, reinstatement, and permanent placement in the borrow pits will be undertaken to prevent water quality impacts.
- Avoiding disturbance to natural drainage features, minimising any works in or around artificial drainage features, and diverting clean surface water flow around excavations and construction areas are incorporated to mitigate impacts on water quality. In addition, collection of any drainage waters from works areas within the site that might carry silt will be carried out, to allow settlement and cleaning prior to its release. During the construction phase all runoff will be treated to a high quality prior to being released. A self-imposed 50m stream buffer was used during the layout of the proposed wind farm development site, thereby avoiding sensitive hydrological features.
- There will be no risk of increased flooding down-stream as a result of the Proposed Wind Farm due to the proposed drainage measures and also since the Proposed Wind Farm infrastructure does not encroach fluvial flood zones. A site specific Flood Risk Assessment was carried out for the Proposed Project.
- There will be no risk of increased flooding down-stream as a result of the Proposed Wind Farm due to the proposed drainage measures and also since the Proposed Wind Farm infrastructure does not encroach fluvial flood zones. A site specific Flood Risk Assessment was carried out for the Proposed Project.

The NEHS has considered Chapter 9 – Water of the EIAR and the sections referenced. Based on the information provided in chapter 9, 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.

8. Noise and Vibration - Specific Guidance for Wind Energy Development

The current Guidelines for Wind Energy Development (GWED) are: Wind Energy Development Guidelines (WEDG) (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 have 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 (WEDG) 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 2019 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 Draft Guidance 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>

The NEHS notes the most recent development in the Case below:

Nagle View Turbine Aware Group v An Bord Pleanála, and Coom Green Energy the Office of Planning Regulator key takeaways included in the context of Section 28 guidelines, it is in principle lawful to have regard to draft guidelines as part of the evolving scientific context or in *"illuminating what amounts to best practice"*, particularly where the existing guidelines are potentially viewed as outdated.

https://publications.opr.ie/storage/publications/HKpLQPHtDmvgiveTUIpHqYeoNVmt99rqGKgeAi2J.pdf?_gl=1*1uukl22*_ga*MjA0MTE1MDM0Ny4xNzcwNzI1OTAx*_ga_J58VT3XFH2*_czE3NzA3MjU5MDAkbzEkZzEkdDE3NzA3MjYxMDgkajQzJGwwJGgw

It is stated in the NTS that an environmental consultant has been commissioned to conduct an assessment into likely environmental noise and vibration impacts of the proposed development and that the *'background noise environment was established through noise monitoring surveys undertaken at five noise sensitive locations (NSLs) surrounding the Proposed Wind Farm Site. Typical background noise levels for day and night periods at various wind speeds have been*

measured in accordance with best practice guidance contained in the Institute of Acoustics document 'A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise' (IOA GPG). The results of the background noise survey have been used to derive appropriate noise criteria for the development in line with the guidance contained in 'Wind Energy Development Guidelines for Planning Authorities 2006'.

The NTS also states: 'Three stages of the development have been considered in this assessment – short term construction and decommissioning phases and the long-term operational phase.'

The impacts of this development during construction and operation are addressed in Chapter 12 of the EIAR, Noise and Vibration. This chapter states *'the assessment of construction noise and vibration has been conducted in accordance with best practice guidance contained in BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Noise and BS 5228-2:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Vibration. Subject to good working practice as recommended in the EIAR Chapter, noise associated with the construction phase is not expected to exceed the recommended limit values. The associated noise and vibration is not significant and will not cause any significant effects'*

It is also stated in Chapter 12: *'based on detailed information on the proposed turbine locations, turbine noise emission levels and turbine height, worst-case turbine noise levels have been predicted at noise sensitive locations (NSLs) for a range of operational wind speeds. The predicted noise levels associated with the Proposed Wind Farm, with the implementation of a noise curtailment strategy, will be within best practice noise limits recommended in WEDG (DoEHLG, 2006), therefore a significant effect is not associated with the development'*

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.

WEDG 2006 states: *'Separate noise limits should apply for daytime and for night-time. During the night the protection of external amenity becomes less important and the emphasis should be on preventing sleep disturbance. A fixed limit of 43 dB(A) will protect sleep inside properties during the night. In general, noise is unlikely to be a significant problem where the distance from the nearest turbine to any noise sensitive property is more than 500 metres. Planning authorities may seek evidence that the type(s) of turbines proposed will use best current engineering practice in terms of noise creation and suppression.'*

If consent is given for this development, mitigation measures such as a noise curtailment strategy should be made a condition of the consent for all phases i.e. construction, operation, maintenance and decommissioning phases. Particularly to prevent sleep disturbance. This recommendation is made in the interest of protecting Public Health.

9. Shadow Flicker

It is acknowledged in the NTS that shadow flicker is entirely controllable.

The shadow flicker methodology and assessment within Chapter 5, Population and Human Health of the EIAR are based on compliance with the 'Best Practice Guidelines for the Irish Wind Energy Industry' Guidelines 2006, which remain to be the current adopted guidelines. However, it should be noted that the assessment of shadow flicker completed also complies with the requirements of the draft 2019 Guidelines (i.e. zero shadow flicker occurrences, should they be adopted as currently proposed, while the planning application is being determined through the strict implementation of a shadow flicker shutdown system.

It is stated in Chapter 5 of the EIAR that:

'Computer modelling of the occurrence and magnitude of shadow flicker is made possible by the fact that the sun rises and sets in the same position in the sky on every day each year. Any potential impact can be precisely modelled to give the start and end time of any incidence of shadow flicker, at any location, on any day or all days of the year when it might occur. Where a shadow flicker impact is predicted to occur, the total maximum daily and annual durations can be predicted, along with the total number of days. Any incidence of predicted shadow flicker can be attributed to a particular turbine or group of turbines to allow effective mitigation strategies to be planned and proposed as detailed further below.'

For the purposes of this shadow flicker assessment, the software package WindPRO has been used to predict the level of shadow flicker associated with the proposed wind farm development. WindPRO is a commercially available software tool that enables developers to analyse, design and optimise proposed wind farms. It allows proposed turbine layouts to be optimised for maximum energy yield whilst taking account of environmental, planning and engineering constraints.'

There are 108 sensitive receptors located within 1.63km of proposed turbine locations

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 advanced 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 technologically robust and established. This mitigation should be implemented irrespective of whether the current guidance is updated.

10. Observations (Construction Noise)

The NEHS recommend that operating times during the construction phase are limited as follows in order to minimise the impact of noise on residents. It is advised that the applicant should not operate outside these time limits unless absolutely necessary and with prior approval from the Planning Authority.

Monday to Friday 07:00 – 19:00

Saturday 08:00 – 13:00

Sundays and Public Holidays - No noisy operations on site.

11. Construction and Environmental Management Plan

The NTS states 'A Construction and Environmental Management Plan (CEMP) will be in place throughout the construction phase (see Appendix 4-5). The CEMP includes dust suppression

measures. In addition, turbines and construction vehicles will be transported to the site on specified haul routes only, which will be regularly inspected for cleanliness and cleaned as necessary'

Other preventative measures also include fuel and concrete management and a waste management plan which will be incorporated into the overall CEMP

The NEHS has considered the CEMP in Appendix 4-5

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:

- 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
- There should be no direct emission to ground or surface water of any foul wastewater. All wastewater should be contained and taken off site to a licensed treatment facility.
- 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.
- 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.

It is stated in Appendix 4-5, should the Proposed Project secure planning permission, the CEMP will be updated, in line with all conditions and obligations which apply to any grant of permission. The CEMP due to its structure and nature will also require constant updating and revision throughout the construction period, as set out below, therefore it is a working document.

12. Recommendations

NEHS recommends the following:

- With regards to Cahermurphy National School, the likely significant impacts from noise and emissions to air at both the construction and operational phase should be taken into consideration. Also, any likely significant impacts from construction traffic during the day and particularly at the start and end of the school day.
- Given the number of dwellings in the area using private wells, consideration should be given to the protection of these wells, in particular during the construction phase of this development.

If you have any queries regarding this submission, the initial contact is Kathleen Lydon, Principal Environmental Health Officer who will refer your query to the appropriate person.

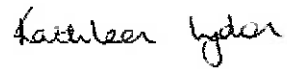
Yours sincerely,

Handwritten signature of Carmel Moran in black ink, appearing as 'C Moran', positioned above a horizontal line.

Carmel Moran

Environment Network Support Unit

HSE National Environmental Health
Service

Handwritten signature of Kathleen Lydon in black ink, appearing as 'Kathleen Lydon', positioned above the typed name.

Kathleen Lydon

Principal Environmental Health
Officer

HSE National Environmental Health
Service