

Lauren Murphy

From: Kathleen Lydon <Kathleen.Lydon@hse.ie>
Sent: Thursday 14 May 2026 13:59
To: SIDS
Subject: Planning Case Reference No: VA03.324156 EHIS Consultation 5865
Attachments: Final EH 5865 NEHS Cahermurphy Wind Farm Grid Connection Proposal.pdf
Categories: Lauren

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Dear Sir/Madam,

Please see attached the Final National Environmental Health Service Submission Report in respect of the Cahermurphy Wind Farm Grid Connection Proposal.

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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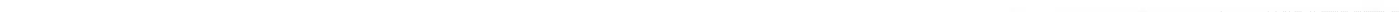


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14th May 2026

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

Case Reference: VA03.324156

HSE ref: 5865

To whom it may concern,

Enclosed are the observations of the National Environmental Health Service (NEHS) on planning application Case Reference: VA03.324156.

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

A handwritten signature in black ink that reads 'Kathleen Lydon'.

Kathleen Lydon
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: 14th May 2026

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

Planning Case Reference No.: VA03.324156

Our Reference No. EHIS: 5865

Report to: An Coimisiún Pleanála

Applicant: MKO Planning Consultant on behalf of Cahermurphy Renewables DAC

Description of Proposed Development: Construction of the proposed Cahermurphy West Wind Farm grid connection development. This development will consist of approximately 25 km of underground 110 kV electrical cabling connecting the wind farm to the existing Moneypoint 110 kV electrical substation to facilitate connection to the National Grid. The grid connection route will generally follow existing roads and agricultural lands and will include associated infrastructure and ancillary works required to facilitate the development.

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 20th April 2026:

1. Emergency Planning
2. National Capital Estates Office – Regional AND
3. Director of National Health Protection
4. REO Mid-West

1. Introduction

The HSE is a statutory consultee under Article 28 of the Planning and Development Act 2000 (as amended) in relation to planning applications accompanied by an EIAR. The National Environmental Health Service (NEHS) considers likely significant effects on Population and Human Health using a source–pathway–receptor approach, with reference to emissions, environmental exposure pathways and recognised health protection criteria.

The assessment adopts a Population Health approach, considering the sensitivity of established land uses and community services, including schools, healthcare facilities and residential areas, rather than individual susceptibilities.

This submission is based on a review of the application documentation and accompanying EIAR. All proposed mitigation measures and commitments have been taken as read.

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.

It is recommended that the An Coimisiún Pleanála (ACP) also follows this method when considering Public Health in their decision making.

The comments below are not exhaustive, but serve to capture key aspects of the proposed development. To further inform this submission, a site visit to the proposed development area was undertaken by the Local Environmental Health Officer on 07th May 2026, the findings of which have been incorporated into the relevant topics addressed in this report.

Description of the Project and Physical Environment

The Applicant has submitted an Environmental Impact Assessment Report (EIAR) for a proposed grid connection comprising approximately 25 km of underground 110 kV electrical cabling. The development will connect the proposed wind farm substation to the existing Moneypoint 110 kV electrical substation, facilitating connection to the National Grid.

The grid connection route traverses multiple townlands in County Clare, including Cahermurphy, Cloonwhite South, Sheeaun, Leitrim, Cloonreddan, Kilmacduane East, Clooncullin, Lissanair, Teernagloghane, Brisla East, Brisla West, Gowerhass, Tullagower, Garraunnatooha, Knockerry West, Carrowfree, Derrylough, Dunneill, Doonnagurroge, Pouladarree, Carrowdotia South, and Carrowdotia North. The EIAR boundary covers approximately 637 hectares.

The route passes through a predominantly rural landscape characterised by small-scale agriculture, forestry, and areas of hilly bogland transitioning to lower-lying terrain towards Cloonreddan. Existing wind turbines and associated energy infrastructure are present within the wider area, particularly in Cahermurphy and near the Moneypoint substation.

The development is located within areas identified in the Clare Wind Energy Strategy (2017, updated in the Clare County Development Plan 2023–2029) as suitable for renewable energy infrastructure, including lands designated as Strategic Areas and areas "Acceptable in Principle" for wind energy development.

1. Public Consultation

The EIAR demonstrates that public consultation has informed the project design process, as outlined in Chapter 2 and associated appendices.

A Community Liaison Strategy was implemented to facilitate engagement with local residents. Community Liaison Officers (CLOs) undertook engagement activities including door-to-door consultations, public meetings, and ongoing communication from June 2024 onwards. Public consultation events were held in June 2024 and August 2025.

Feedback received during consultation was considered in the development of the final design. A Public Consultation Report has been prepared outlining key issues raised and the Applicant's responses, consistent with established EIA best practice.

2. Population and Human Health

The NEHS has reviewed Chapter 5 of the EIAR in relation to Population and Human Health.

Population and human health considerations are addressed appropriately through the source–pathway–receptor approach, focusing on potential environmental emissions during construction of the grid connection, including noise, dust, traffic, and water quality risks.

The EIAR identifies key potential pathways of relevance to public health, including:

- exposure to construction noise and vibration,
- dust emissions during excavation and trenching,
- potential contamination of surface water and groundwater,
- and traffic-related impacts affecting community access.

The assessment appropriately recognises nearby sensitive receptors including residential properties, schools, community facilities, and local businesses along the grid connection corridor. The NEHS is of the opinion that these aspects have been identified and assessed within the EIAR and are consistent with standard environmental health considerations for this type of infrastructure project.

3. Noise and Vibration

The grid connection route passes through a predominantly rural area containing a range of sensitive receptors including residential dwellings, schools, community facilities, sports amenities, private businesses and drinking water sources.

Occupied dwellings are located in close proximity to sections of the route, particularly in Cahermurphy, Leitrim, Cloonreddan, Carrowdotia South and Carrowdotia North. These receptors may experience temporary impacts during construction including noise, vibration, dust, traffic disruption and reduced access.

Sensitive community receptors include Cahermurphy National School, Knockerra National School, Knockerra Church, the associated graveyard and community hall, West Clare Sports and Fitness facility in Cloonreddan, and a food premises in Leitrim. These may experience temporary disturbance associated with trenching, excavation, HDD works and construction traffic.

A quarry facility located approximately 1 km from the route at Tullagower contributes to baseline industrial noise in the area and may result in cumulative noise effects when considered alongside construction activities and associated HGV movements.

The NEHS considers that Chapter 12 (Noise and Vibration) appropriately identifies potential temporary impacts associated with construction activities. However, given the proximity of multiple sensitive receptors, further consideration is warranted in relation to cumulative impacts and receptor sensitivity, particularly for schools, community facilities, and adjacent commercial premises.

Construction activities may result in temporary increases in noise levels, vibration, and amenity disturbance. The combined effects of construction traffic, narrow rural roads, and nearby quarry activity may increase the perceived noise environment for some receptors.

The NEHS recommends that, if permission is granted, the following measures are secured:

- a) Implementation of a construction noise management and curtailment strategy.
- b) Construction hours restricted to:
 - **Monday–Friday: 07:00–19:00**
 - **Saturday: 08:00–13:00**
 - **Sundays/Public Holidays: No noisy works permitted**
- c) Noise and vibration monitoring at sensitive receptor locations.
- d) Restrictions on working hours near schools and community facilities where feasible.
- e) Consideration of cumulative noise impacts, including nearby quarry operations.
- f) Maintenance of safe access to residential and community receptors.
- g) Implementation of a complaints management procedure.

These measures would assist in protecting residential amenity and community wellbeing during construction.

4. Air Quality (Dust)

Chapter 10 of the EIAR outlines standard dust mitigation measures including water suppression, covering of materials, wheel washing, speed controls and good site housekeeping.

While sensitive receptors are acknowledged in general terms, including residential dwellings, schools, community facilities, and recreational areas, the assessment does not provide a receptor-specific dust management or monitoring plan for locations along the route.

From an NEHS perspective, the absence of a targeted dust control and monitoring strategy for nearby sensitive receptors represents a gap in ensuring adequate protection during construction. The NEHS recommends a receptor-focused dust management plan be implemented, including monitoring and mitigation measures at schools, residential clusters and sensitive community facilities along the grid connection route.

5. Land, Soils and Geology

Chapter 8 of the EIAR addresses geological conditions, soils, and peat stability. Overall peat instability risk is assessed as low.

However, construction activities including excavation, trenching, joint bay installation, and directional drilling may result in localised ground disturbance with potential indirect effects on human health through sediment mobilisation or contamination pathways.

Sensitive hydrological receptors include rivers in Clooncullin and Teernagloghane, private wells in Cahermurphy, and Doolough Lake, which forms part of the regional rural water supply and is hydrologically connected to the wider area.

If consent is given for this development then the mitigation measures outlined in the Construction Environmental Management Plan (CEMP) should be fully implemented and secured by condition of consent.

6. Water

The EIAR identifies potential indirect interactions with water receptors including local rivers, private wells, and regional water supplies.

While no direct human health impacts are anticipated, there is potential for indirect effects during construction through sediment runoff, spills, or disturbance of drainage pathways.

The NEHS recommends strict adherence to the CEMP, with particular emphasis on:

- surface water protection,
- spill prevention,
- and management of excavated material.

7. Traffic and Access

The grid connection route follows local roads, the R484 regional road, and crosses the N68 at Knockerry West. A number of local roads are narrow and in poor condition, including sections in Cloonwhite, Teernagloghane and Pouladarree (L6154).

Ferry-related traffic from Killimer Ferry was also observed using narrow rural roads in the Garraunnatooha/Knockerry West area, with seasonal increases in traffic volumes.

The construction traffic assessment identifies road closures for approximately 241 days, with temporary increases in traffic during key construction phases including excavation, deliveries, and abnormal load movements.

While the assessment concludes that impacts are not significant, the NEHS considers that local road conditions and observed traffic patterns indicate a higher potential for community disruption than reflected in the predictive modelling.

It is the NEHS opinion that prolonged road closures combined with increased construction traffic on narrow rural roads may affect access to homes, schools, and community facilities and increase safety risks for vulnerable road users.

8. Construction Environmental Management Plan (CEMP)

The CEMP provides a framework for environmental protection during construction. The NEHS considers that adequate protection of public and environmental health can be achieved provided all mitigation measures are fully implemented, monitored, and enforced.

Key requirements include:

- protection of water supplies,
- dust suppression measures,
- drainage protection,
- waste management controls,
- and site environmental monitoring.

It is noted that pest control is referenced only in general terms and is not developed into a specific pest management programme for protection of nearby sensitive receptors.

9. Food Safety and Environmental Compliance

The development itself will bring level of employment in the construction phase. Should welfare facilities in any of the temporary construction compounds become a commercial kitchen/canteen or food preparation area, then it operates as a food business. The NEHS require that registration be undertaken in accordance with Article 6(2) of Regulation (EC) No. 852/2004, and that early engagement with the appropriate registering authority be undertaken to ensure compliance with food hygiene legislation.

Where smoking shelter(s) are provided if any within temporary construction compounds, they shall comply with Section 47 of the Public Health (Tobacco) Act 2004 (as amended). The unit recommends that early engagement with the appropriate registering authority is undertaken to ensure compliance with Tobacco legislation.

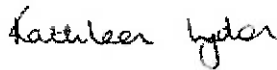
10. Recommendations

Should permission be granted, the NEHS recommends the following:

1. Implementation of construction noise curtailment measures and defined working hours.
2. Full implementation of water protection measures under Chapter 9 Water and the CEMP.
3. Receptor-specific dust management and monitoring near sensitive locations.
4. Traffic management measures to ensure safe access to homes, schools, and businesses.
5. A pest control plan should be implemented throughout the construction phase to protect workers and sensitive receptors, including nearby residences, schools and food premises. Construction activities should ensure that drains and sewers are not damaged or left open, in order to prevent rodent access and infestation.
6. Compliance with food safety legislation where applicable (Regulation (EC) No. 852/2004).
7. Compliance with tobacco legislation with Section 47 of the Public Health (Tobacco) Act 2004 where applicable for any temporary smoking facilities on site.

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,



Olivia Devaney

Kathleen Lydon

Environmental Health Officer

Principal Environmental Health Officer

Environment Network Support Unit

HSE National Environmental Health Service

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