

## Niamh Hickey

---

**From:** Mary Collins <MaryF.Collins@hse.ie>  
**Sent:** Wednesday 3 June 2026 11:34  
**To:** SIDS  
**Cc:** Adrian OSullivan (PEHO); Tom Sugrue  
**Subject:** Planning Ref PAX04.324165 Proposed Maughanaclea Wind Farm Co. Cork  
**Attachments:** EHS Ref 5889 Proposed Maughanaclea Wind Farm Co Cork 03.06.2026.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Niamh

You don't often get email from maryf.collins@hse.ie. [Learn why this is important](#)

**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.

Please find attached National Environmental Health Service Submission Report for Proposed Maughanaclea Wind Farm, PAX04.324165.

Sent on behalf of  
Adrian O'Sullivan, Principal Environmental Health Officer

Thanks,  
Mary  
**Mary Collins**  
Oifigeach Cleireachais | Clerical Officer

Environmental Health Service, Elmwood House, Lurriga, Skibbereen, Co. Cork. P81 FC83  
Seirbhís Slóinte Comhshaoil, Teach Elmwood, An Lorga, An Sciobairín, Co. Chorcaí, P81 FC83  
028-51456 | 087-3212606 | [hse.ie/environmentalhealth](https://www.hse.ie/environmentalhealth)



---

"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. Seans 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 Seirbhísi ECT ar an nguthán ag [+353 818 300300](tel:+353818300300) 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:+353818300300) or by email to [service.desk@hse.ie](mailto:service.desk@hse.ie) and thereafter delete this e-mail from your system"

---



FSS Seirbhís Náisiúnta Sláinte  
Comhshaoil  
Teach Elmwood, An Lorga,  
An Sciobairín,  
Co. Corcaigh. P81 FC83

HSE National Environmental Health  
Service  
Elmwood House, Luriga,  
Skibbereen,  
Co. Cork P81 FC83

www.hse.ie  
T: 028-51456  
E: eho.westcork@hse.ie

## **National Environmental Health Service Submission Report**

*(as a Statutory Consultee under the Planning and Development Acts 2000 (as amended) & Regulations made thereunder)*

<b>Date:</b>	03 <sup>rd</sup> June 2026
<b>Type of consultation:</b>	Strategic Infrastructure Development (SID) accompanied by Environmental Impact Assessment Report (EIAR)
<b>Planning Case Reference No.:</b>	PAX04.324165
<b>Our Reference No.</b>	EHIS: 5889
<b>Report to:</b>	An Coimisiún Pleanála
<b>Applicant:</b>	MKO Planning Consultant on behalf of Maughanaclea Ltd
<b>Description of Proposed Development:</b>	Construction of the proposed wind farm development which involves the construction of 14 wind turbines and all associated infrastructure required to support their operation. This includes an onsite 110 kV substation and a 13.8 km underground grid connection linking the site to the existing Dunmanway 110 kV substation. The grid connection route will generally follow existing roads and agricultural lands.



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 28<sup>th</sup> April 2026:

1. HSE South Emergency Management
2. National Capital Estates Office – Regional AND
3. Director of National Health Protection
4. REO South 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. 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.

## **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](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)\* 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\*. In keeping with the requirement of the amended Directive, an EIAR should take account of the results of such assessments without duplicating them.

Population and Human Health therefore differ in terms of how the likelihood of significant effects is considered within the EIA. The assessment should focus on established land use and development patterns, service provision, and community activities, rather than on individual members of the community.

**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 general assessment of the area was carried out by the local Environmental Health Officer (EHO) on 23 May 2026, and the findings have been incorporated into this report.

To further inform this submission, a site visit to the proposed development area was undertaken by the Local Environmental Health Officer on 21<sup>st</sup> 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 EIAR in respect of the proposed development of fourteen (14) wind turbines, together with ancillary and associated works, within the townlands of Kealkill\*, Maularaha\*, Ardrah, Maughanaclea, Gortnacowly\*, Coomleagh West\*, Ballynamought, Gortloughra, Cousane and Coomclogh, Co. Cork. The application also includes a proposed Grid Connection located within the townlands of Maughanaclea, Cousane, Glanycamey, Derragh, Shanacrane East\*, Keenrath, Derrynacaheragh,



Inchireagh\*, Shiplough, Coolsnaghtig, Mallabracka, Derrylahan, Keelaraheen\*, Gortanure\*, Derreens, Demesne, Dunmanway North, Milleenanannig and Ballyhalwick, Co. Cork.

The proposed wind farm is situated approximately 2.3km east of Kealkill and comprises two turbine clusters, located to the north and south of the site, within a predominantly rural landscape characterised by peatlands, coniferous forestry, and heathland. Site access will be provided from the R585, including a new entrance serving the northern turbine cluster. The Proposed Grid Connection comprises approximately 20.5km of 110kV underground cabling connecting the proposed onsite substation at Maughanaclea to the existing Dunmanway 110kV substation, with the majority of the route located within the public road corridor.

The application seeks planning permission for a period of ten years. The Proposed Project is expected to have an operational lifespan extending beyond the 35-year operational period included within the planning application. The construction phase will take approximately 18-24 months to complete from starting on site to the commissioning of the electrical system and export of electricity from site.

## **2. Public Consultation**

As outlined in Chapter 5 (Population and Human Health) and Appendix 2-1 (Community Engagement Report), a Community Liaison Strategy was implemented to facilitate engagement with local residents. This included door-to-door distribution of information packs to households within approximately 2 km of the site, a project website and dedicated contact channels, and direct liaison with residents regarding queries and concerns.

Two Public Information Exhibitions were held in Bantry in April and November 2025, where project information was presented and feedback invited on issues including proximity to residences, noise, visual impacts, biodiversity, and community benefit. According to the Community Engagement Report, feedback received through the consultation process was recorded, considered by the project team, and used to inform aspects of the project design.

*The Draft Revised Wind Energy Development Guidelines (2019) state:*

*"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."*

**The NEHS considers it important that, should the proposed development proceed, regular communication and engagement with the local community be maintained throughout the construction and operational phases.**

## **3. Population and Human Health**

The NEHS has reviewed Chapter 5 of the EIAR in relation to Population and Human Health, which assesses the potential impacts of the Proposed Development on population and human health during the construction, operational and maintenance, and decommissioning phases.



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 identifies sensitive receptors in the vicinity of both the Proposed Wind Farm and the Grid Connection. Residential properties are present within the surrounding study areas, including those located within approximately 1.3km of the turbine locations and within 250m of the grid connection route.

For the purposes of assessing potential human health and amenity effects, the Proposed Wind Farm is primarily considered in relation to the distribution of nearby residential receptors, while the wider population baseline is addressed separately within the EIAR. Where the Proposed Grid Connection requires separate consideration, this is clearly distinguished within the assessment.

The NEHS considers that these elements have been appropriately identified and assessed within the EIAR and are consistent with standard environmental health practice for this type of infrastructure development.

#### **4. Noise and Vibration – Specific Guidance for Wind Energy Development**

The current statutory guidance for wind energy development in Ireland is contained within the Wind Energy Development Guidelines for Planning Authorities (2006) (WEDG). The NEHS acknowledges that wind energy development has evolved significantly since publication of the 2006 Guidelines, particularly in relation to turbine size, generating capacity, cumulative development and the proximity of some developments to residential receptors. There has also been considerable growth in the evidence base regarding potential effects on population health and wellbeing, including issues relating to turbine noise characteristics and shadow flicker.

A review of the 2006 Guidelines commenced in 2013, culminating in the publication of the Draft Revised Wind Energy Development Guidelines in December 2019. While these revised guidelines have not yet been formally adopted, they remain publicly available and indicate an intention to provide greater consistency, certainty and clarity for planning authorities, developers and local communities in relation to onshore wind energy development.



The NEHS notes the High Court decision in *Webster and Rollo v Meenaclogher (Wind) Limited* [2024 IEHC 136]. The Court found that the noise experienced by the plaintiffs constituted a private nuisance, with particular regard given to impacts on residential amenity, wellbeing and quality of life. The judgement recognised that compliance with planning conditions does not necessarily preclude a finding of nuisance and considered the specific circumstances and evidence presented in that case.

The NEHS further notes that nuisance arising from noise is inherently dependent on the characteristics of the noise source, the receiving environment and the perception of those affected. Consequently, the assessment of nuisance is highly site-specific.

The NEHS also notes the recent judgement in *Nagle View Turbine Aware Group v An Bord Pleanála and Coom Green Energy*, which highlighted that draft Section 28 guidance may be considered in understanding evolving scientific knowledge and emerging best practice, particularly where existing guidance may be viewed as dated.

#### **General Assessment of the Area:**

The proposed development is located within an upland rural area characterised by commercial forestry and agricultural land uses. Noise-sensitive receptors in the surrounding area consist primarily of dispersed rural dwellings and farmhouses located along the R585 and throughout the wider rural landscape.

Educational facilities within the wider receiving environment include Cappabue National School, approximately 2 miles north of the northern extent of the proposed development, Kealkil National School, approximately 3 miles west of the site, and Dromclough Primary School, approximately 3 miles southwest of the development. The terrain between the proposed development and these schools may provide some screening, making it difficult to determine the likely level of noise impact. However, the schools have been considered as sensitive receptors within the assessment.

The Noise and Vibration assessment is presented in Chapter 12 of the EIAR and summarised within the Non-Technical Summary (NTS).

The assessment considers the construction, operational and decommissioning phases of the proposed development. Construction and decommissioning noise and vibration have been assessed in accordance with BS 5228-1:2009+A1:2014 and BS 5228-2:2009+A1:2014. The EIAR concludes that associated impacts will be temporary and localised and, subject to standard



mitigation measures, will not result in significant effects at nearby sensitive receptors.

The operational noise assessment was undertaken by AWN Consulting Limited using site-specific turbine data and baseline noise surveys conducted at six representative noise-sensitive locations surrounding the proposed wind farm. The assessment was carried out in accordance with ETSU-R-97 and the Institute of Acoustics Good Practice Guidance.

The EIA concludes that operational noise from the proposed turbines will comply with the noise limits contained within the Wind Energy Development Guidelines for Planning Authorities (2006). Based on this assessment, significant operational noise effects are not predicted at nearby residential or other noise-sensitive receptors.

The grid connection route traverses a predominantly rural area. While construction activities associated with the grid connection may result in temporary increases in noise, vibration and disturbance, these impacts are expected to be short-term in nature. The combination of construction traffic and the use of narrow rural roads may increase perceived disturbance for some receptors during the construction phase.

Having reviewed the information provided in the EIA and NTS, the NEHS notes that the assessment predicts no significant noise or vibration effects during construction, operation or decommissioning, subject to the implementation of the proposed mitigation measures and compliance with applicable guidance and standards. Notwithstanding these conclusions, the NEHS considers that a robust noise management framework should be secured by condition in the interests of protecting residential amenity, community wellbeing and public health.

**Should planning permission be granted, the NEHS recommends that the following measures be secured:**

- a) Implementation of a Construction Noise Management Plan and noise control strategy.
- b) Restriction of construction working hours to:
  - Monday to Friday: 07:00–19:00
  - Saturday: 08:00–13:00
  - Sundays and Public Holidays: No noisy construction activities
- c) Noise and vibration monitoring at representative sensitive receptor locations where required.



- d) Additional controls on construction activities in proximity to schools where practicable.
- e) Implementation of any cumulative noise mitigation measures identified within the EIAR.
- f) Maintenance of safe access to residential properties, farms and schools throughout the construction period.
- g) Establishment of a complaints management and response procedure.
- h) Operational noise management measures, including turbine curtailment where required, to ensure ongoing compliance with approved noise limits.

The NEHS is of the opinion that these measures would assist in protecting residential amenity, community wellbeing and public health throughout the construction, operational and decommissioning phases of the proposed development.

#### **Shadow Flicker**

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

The NEHS has noted the following statement within Chapter 2: Background to the Proposed Project:

*"While the final guidelines have not yet been published it should be noted that Shadow Flicker and Noise are entirely controllable and are discussed further in Ch. 5: Population and Human Health and Ch.12: Noise and Vibration, respectively."*

Chapter 5 identifies and assesses the potential for shadow flicker effects at nearby sensitive receptors and concludes that, subject to the proposed mitigation measures, significant effects are not anticipated. This indicates that the applicant considers potential shadow flicker effects capable of being effectively managed through project design, setback distances, operational controls and mitigation measures.

Notwithstanding this conclusion, shadow flicker is acknowledged within the EIAR as a potential residential amenity issue which may contribute to annoyance, disturbance and stress or reduced quality of life for nearby residents if not appropriately controlled. Accordingly, it is important that all proposed mitigation, monitoring and complaint response procedures relating to shadow flicker are fully implemented and maintained throughout the operational phase of the development in order to protect nearby sensitive receptors and residential amenity.



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).

**The NEHS considers that the shadow flicker condition proposed in the Draft Revised Wind Energy Development Guidelines (2019) represents current best practice and should be considered for inclusion in any planning permission granted.** 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 available to control and prevent significant shadow flicker effects are technologically robust and well established. This mitigation should be implemented irrespective of whether the current guidance is updated.

**If consent is given for this development, the NEHS recommends that conditions be attached requiring the implementation, monitoring, and ongoing review of shadow flicker mitigation measures, together with a robust complaint investigation and response procedure for nearby residents.**

#### **Observations (Construction Noise)**

The EIAR outlines proposed construction working hours. The NEHS recommends that any planning permission granted includes enforceable restrictions on construction operating hours in order to minimise noise disturbance to nearby residents and protect residential amenity.

The NEHS recommends 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.**



### **Rock Breaking**

Rock breaking may be required during excavation of turbine foundations where hard ground conditions are encountered. However, the EIAR predicts that noise levels at nearby residential receptors will reduce significantly with distance and are not expected to result in significant environmental or human health impacts.

Notwithstanding this, the NEHS recommends that best practice construction noise mitigation measures continue to be implemented during any rock breaking activities, including consideration of temporary berms, mounds, or other screening measures where practicable, in order to minimise noise propagation towards nearby sensitive receptors.

### **Land, Soils and Geology**

Chapter 8 of the EIAR addresses Land, Soils and Geology. The report states that the proposed development would give rise primarily to temporary and localised impacts associated with excavation works, soil disturbance, erosion, and the potential for accidental spillages during construction, with mitigation measures proposed to reduce these effects to acceptable levels.

Chapter 8 concludes that, subject to the implementation of the proposed mitigation measures, residual impacts on land, soils and geology are not expected to be significant.

NEHS notes that significant long-term impacts are unlikely where best practice construction management, drainage controls, and environmental monitoring are effectively implemented. However, a worst-case scenario involving the release of fuels, oils, sediments, or contaminated runoff to surrounding soils, groundwater, or nearby watercourses could adversely affect environmental quality and potentially human health through impacts on water resources and amenity.

The NEHS further notes that temporary construction-related effects, including dust, noise, vibration and increased traffic, are assessed separately within the EIAR and may contribute to short-term impacts on nearby residents, particularly sensitive or vulnerable populations, during the construction phase.

The NEHS recommends that, should consent be granted for the proposed development, the mitigation measures identified in Chapter 8: Land, Soils and Geology, together with the relevant commitments contained within the Construction Environmental Management Plan (CEMP), be secured through appropriate planning conditions and implemented throughout the construction and operational phases of the development in the interest of protecting public health.

### **Hydrology & Hydrogeology**

The NEHS has considered Chapter 9 of the EIAR which sets out to assess the potential impacts of the development on the water environment (surface and groundwater).

The proposed development is located within the Owvane River, Mealagh River and Bandon River catchments, including areas associated with public drinking water abstraction supplies and potentially sensitive private, group and unregistered water supplies. The assessment acknowledges that construction and decommissioning activities have the potential to adversely affect surface



water and groundwater quality through sediment release, hydrocarbon contamination, runoff, drainage alteration, or disturbance of hydrological pathways.

The chapter also references consideration of flood risk mapping and groundwater vulnerability as part of the assessment process and notes that there are *'no records of recurring or historic flood instances within the Proposed Development Site'*, concluding that the site is located within *'Flood Zone C where there is a low risk of fluvial flooding'*.

Mitigation measures proposed include the implementation of drainage and attenuation controls, buffer zones around watercourses, pollution prevention measures, sediment and hydrocarbon containment, water quality monitoring, and adherence to Construction Environmental Management Plan (CEMP) procedures and best practice guidance.

The EIAR concludes that, subject to the effective implementation of these mitigation measures during construction, operation and decommissioning phases, significant adverse impacts on water resources are unlikely, and consequently no significant effects on population and human health are anticipated.

**The NEHS recommends that, should consent be granted for the proposed development, the mitigation measures set out in Chapter 9: Hydrology and Hydrogeology, together with those contained within the Construction Environmental Management Plan (CEMP), are secured by condition and implemented throughout the construction, operational and decommissioning phases of the development.**

## **7. Traffic and Access**

The proposed development is located within a rural upland area served by a local road network, with access likely utilising existing rural and forestry-type roads into the site. Given the nature and condition of the surrounding road network, construction traffic may result in temporary disruption to local road users and amenity.

In this context, the NEHS considers it appropriate that a comprehensive Construction Traffic Management Plan (CTMP) be prepared and implemented for all phases of the proposed development, including construction, operation (where relevant), maintenance and decommissioning, in order to minimise traffic-related impacts on local residents and ensure road safety.

## **8. Construction Environmental Management Plan (CEMP)**

The NTS states that a Construction Environmental Management Plan (CEMP) will be implemented throughout the construction phase (Appendix 4-3). The CEMP includes dust suppression measures, haul route management, wheel washing and cleaning of construction vehicles, together with controls for fuel, concrete, and waste management. These measures are designed to minimise environmental impacts during construction.

The NEHS has reviewed the CEMP contained in Appendix 4-3 of the EIAR. The plan is comprehensive and incorporates a range of standard mitigation measures for the protection of environmental quality and public health during



the construction phase. The NEHS considers that adequate protection of public and environmental health can be achieved provided all mitigation measures are fully implemented, monitored, and enforced.

The CEMP also confirms that it will function as a live document and will be updated, where necessary, to reflect planning conditions, audit outcomes, and changes in construction methodology. This is considered appropriate and consistent with best practice environmental management.

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 phase if all mitigation measures identified are implemented in full.

The NEHS notes that Appendix 4-3 of the EIAR states that the CEMP will be updated, where necessary, to reflect any conditions or obligations attached to a grant of planning permission. The document also notes that the CEMP is intended to function as a live working document, requiring ongoing review and revision throughout the construction phase in response to environmental management requirements, auditing outcomes, or construction methodology changes

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.

While the CEMP includes general housekeeping, waste management and environmental protection measures, there does not appear to be a specific Pest Control Management Plan included within the documentation. Given the nature and duration of the construction works, particularly in areas where sensitive receptors are located along the Proposed Grid Connection route, consideration should be given to the implementation of appropriate pest and vermin control measures during the construction phase.

### **9. Food Safety and Environmental Compliance**

The development itself will bring a level of employment in the construction and operational 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 for the proposed development, the NEHS recommends that the following measures be secured by condition and implemented throughout the construction, operational, and decommissioning phases, where relevant, in order to protect population health, residential amenity, and public safety.

1. Protection of private water supplies: A pre-construction survey should be undertaken to identify any private water supplies (wells, springs or boreholes) within the potential zone of influence of the development. Where identified, appropriate buffer distances, protection measures, and monitoring should be implemented to safeguard drinking water quality and public health.



2. **Water protection measures (CEMP implementation):** Full implementation of CEMP water protection measures should be secured to prevent contamination of surface water, groundwater, and private supplies, thereby protecting drinking water sources and downstream receptors
3. **Construction traffic management and road safety:** A Construction Traffic Management Plan should be implemented to ensure safe access for residents, farms, schools, and emergency medical services. A Road Safety Audit should be undertaken in consultation with the local authority, with particular regard to narrow rural roads and vulnerable road users.
4. **Construction noise control and working hours:** Construction activities should be restricted to defined working hours to protect residential amenity, including sleep quality:
  - Monday–Friday: 07:00–19:00
  - Saturday: 08:00–13:00
  - Sundays/Public Holidays: No noisy works

Any deviation should require prior approval.

5. **Vibration monitoring (construction phase):** Vibration monitoring should be undertaken at nearby sensitive residential receptors during rock breaking, excavation, and heavy compaction works, with defined trigger levels and mitigation responses to prevent nuisance or disturbance.
6. **Cumulative noise and traffic impacts:** Cumulative impacts from other permitted or proposed wind energy developments in the area should be considered in relation to noise, traffic, and combined effects on residential amenity.
7. **Community communication and notification:** A community liaison and notification system should be implemented to inform residents in advance of disruptive construction activities such as abnormal load deliveries, road closures, or rock breaking operations.
8. **Emergency medical access:** Continuous access for emergency services should be maintained to all nearby dwellings, farms, and schools throughout all phases of the development.



9. Residential amenity controls (lighting): Construction lighting should be designed to minimise light spill and avoid unnecessary night-time illumination that could impact nearby residential amenity and sleep quality.
10. Complaints management system: A formal complaints procedure should be maintained throughout the construction phase to address issues relating to noise, dust, traffic, and general residential amenity.

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

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Sullivan', is written above a horizontal line.

---

Adrian O'Sullivan

Principal Environmental Health Officer