
Planning Reference No: PAX03.324270 EHIS Consultation 5958

From Kathleen Lydon <Kathleen.Lydon@hse.ie>

Date Mon 6/22/2026 4:45 PM

To SIDS <sids@pleanala.ie>

 1 attachment (590 KB)

Final EH 5958 NEHS Proposed Renewable Energy Development at Slieveacurry Co Clare.pdf;

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Dear Sir/Madam,

Please see attached the Final National Environmental Health Service Submission Report for the proposed Renewable Energy Development at Slieveacurry, 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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**An tSeirbhís Sláinte Comhshaoil Náisiúnta,
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22/06/2026

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
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Case Reference: PAX03.324270

HSE ref: 5958

To whom it may concern,

Enclosed are the observations of the National Environmental Health Service (NEHS) on planning application Case Reference: PAX03.324270

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 the Planning and Development Acts 2000 (as amended) & Regulations made thereunder)

Date:	22nd June 2026
Type of consultation:	Strategic Infrastructure Development (SID) accompanied by Environmental Impact Assessment Report (EIAR)
Planning Case Reference No.:	PAX03.324270
Our Reference No.	EHIS: 5958
Report to:	An Coimisiún Pleanála
Applicant:	MKO Planning Consultant on behalf of Slieveacurry Ltd
Description of Proposed Development:	Construction of the proposed renewable energy development which involves the construction of 9 no. turbines and all associated infrastructure in the townland of Glendine North and adjacent townlands, Co. Clare, a permanent extension to the existing 110kV Slievecallan substation at and associated works, including underground 33kV internal cabling to connect to the national grid in the townland of Knockalassa, 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 18th May 2026:

- Emergency Planning
- National Capital Estates Office – Regional AND
- 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) 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 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

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 considers likely significant effects on Population and Human Health using a source-pathway-receptor approach, consistent with EPA Guidelines on the Information to be contained in EIARs (2022). The assessment focuses on population-level exposures through environmental pathways rather than individual susceptibilities.

The NEHS notes that cumulative effects may arise where residents are exposed to multiple environmental stressors, including noise, traffic, visual change and construction-related disturbance. While these effects are assessed within the relevant EIAR chapters, consideration should also be given to their combined influence on residential amenity, quality of life and community wellbeing.

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 points of the proposed development.

Comments from Local Environmental Health Service

To further inform this submission, a general assessment of the proposed development and surrounding area was undertaken by the Local Environmental Health Officer on 12 June 2026. The proposed development is located in a rural upland area of County Clare, approximately 7 km south of Ennistymon and 8 km west of Inagh. Miltown Malbay is located approximately 5.8 km west of the nearest proposed turbine location.

The proposed development comprises the construction of nine wind turbines with a maximum blade tip height of 175 meters, together with associated infrastructure, including 33 kV underground electrical cabling and a permanent extension to the existing Slievecallan 110 kV substation. Access to the development is proposed via an existing access track from the local road network to the northwest of the site.

The receiving environment is characterised by a rural landscape comprising drumlin-type hills, upland terrain, commercial conifer forestry, cutover peatland, agricultural land and dispersed one-off housing. Existing renewable energy infrastructure is already present within the wider area. A small disused shale limestone quarry was observed during the general assessment in the Cloonanaha area. Current land uses within the proposed development area comprise commercial forestry, agricultural activities, turf cutting, existing wind energy infrastructure and associated public road corridors. The wider landscape contains a mixture of agricultural land, commercial forestry, renewable energy developments and low-density rural residential development.

The proposed development is located within the Glendine River catchment and is hydrologically connected to a network of streams, drains and watercourses which ultimately discharge to downstream receiving waters. The Inagh River Estuary Special Area of Conservation (SAC) is located approximately 6.2 km north of the proposed development site.

2. Description of the Project and Physical Environment

The applicant has submitted an EIAR on the proposed development including 9 wind turbines and associated infrastructure in the townlands of Cloghaun More, Curraghodea, Fahanlunaghtamore, Fahanlunaghta Beg, Glendine North, Silverhill, Tooreen and Cloghaun Beg, Co. Clare.

The Grid Connection Route will commence at the proposed wind farm site and will continue through the townlands of Curraghodea, Doonsallagh East, Knockalassa, Letterkelly, Shanavogh East and Boolynamiscaun, Co. Clare, where it will connect to the existing Slievecallan 110kV Substation. The proposed development also includes a permanent extension to the existing 110kV substation in the townland of Knockalassa, Co. Clare.

The surrounding area is characterised by a dispersed rural population residing primarily in detached dwellings and traditional rural cottages located along local roads and accessed via private laneways. Residential properties were observed throughout the wider study area during the general assessment. The rural and relatively tranquil nature of the receiving environment may

indicate a degree of sensitivity to environmental changes arising from construction and operational activities.

Community receptors within the vicinity of the proposed development include Cloonanaha National School and Rockmount National School, which are located approximately 1.4 km and 3 km respectively from the nearest proposed turbines. Additional community receptors within the wider area include local recreational facilities, places of worship, burial grounds and community amenities. The presence of these receptors highlights the importance of ensuring that construction and operational activities are appropriately managed to protect residential amenity, community wellbeing and quality of life.

The area surrounding the proposed development supports a predominantly rural economy based on agriculture, forestry and renewable energy. Livestock farming remains a significant land use within the locality, while commercial conifer forestry occupies substantial areas of upland terrain. Existing wind energy developments, including the operational Slievecallan Wind Farm, form part of the established land-use pattern within the wider area.

Proposed Development

- Construction of 9 No. wind turbines with an overall ground-to-blade tip height of 175 metres; rotor diameter of 150 metres; and hub height of 100 metres, and a meteorological mast with a height of 30 metres, and subsequent decommissioning of the wind turbines and meteorological mast, following a thirty five-year operational period from the date of full commissioning of the wind turbines;
- Associated wind turbine and meteorological mast foundations and hardstanding areas;
- An extension to the existing 110kV substation compound in the townland of Knockalassa (Including the provision of a new control building (floor area of 112.5 sq. m) with welfare facilities, all associated electrical plant and apparatus for an additional 110kV bay, security fencing, underground cabling, underground wastewater holding tank, site drainage and all ancillary works);
- Underground electrical (33kV) and communications cabling connecting the proposed wind turbines and meteorological mast to the 110kV substation extension via proposed and existing private access road/tracks and the R460 regional road;
- Temporary accommodation works to facilitate the delivery of turbine components and other abnormal sized loads on the L6230, L1076, L2118 and L1074 local roads;
- Upgrade and widening works to the L6230 local road and access junction off the L6230 local road;
- Upgrade of existing tracks/roads and provision of new site access roads and hardstanding areas;
- A borrow pit; ix. 2 no. temporary construction compounds (including site offices and welfare facilities, with a combined floor area of 202.5 sq.m);
- Peat and Spoil Management;
- Site Drainage; xii. Tree felling and vegetation removal;
- Biodiversity Management and Enhancement Plan measures (including hedgerow planting, peatland, marsh fritillary and hen harrier habitat enhancement areas);
- Operational stage site signage; and
- All associated site development works and apparatus.

The application seeks planning permission for a period of ten years. The Proposed Project would have an operational lifespan of 35 years following commissioning. The construction phase is expected to take approximately 18–24 months from commencement of works on site to the commissioning of the electrical system and export of electricity from the site.

A full description of the Proposed Development is provided in Non-Technical Summary (NTS) and Chapter 2 of the EIAR in more detail.

3. Public Consultation and Non-Technical Summary (NTS)

The NEHS is satisfied that the NTS provides an adequate description of the proposed project.

The EIAR outlines the community engagement undertaken throughout the development of the Proposed Development, with further detail provided in Appendix 2-2 Community Engagement Report. Consultation activities included direct correspondence with local residents, operation of a dedicated project website, appointment of a Community Liaison Officer (CLO), and the hosting of Public Information Exhibitions (PIEs). Following the refusal of the previous application in 2024, the Applicant re-engaged with the local community regarding a revised proposal and the preparation of a new planning application.

Public consultation included two Public Information Exhibitions held in Miltown Malbay Community Centre in September 2020 and May 2025. The exhibitions provided information on the proposed development, environmental assessments, community benefits and the planning process. Key issues raised by attendees included turbine numbers and height, noise, visual impacts, biodiversity, hydrology, shadow flicker and community gain proposals. The Applicant states that feedback received during the consultation process informed refinements to the project design.

The Community Engagement Report confirms that a dedicated Community Liaison Officer (CLO) has been in place since February 2020, supported by a project website and dedicated contact details to facilitate ongoing engagement with the local community. The report also outlines a proposed Community Benefit Fund which could provide significant long-term funding for local community, educational, sporting and energy efficiency initiatives.

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.

Opportunities for Health Gain

NEHS recommends that the community fund should facilitate infrastructure for everyone and not only funding existing organisations. Consideration should be given to opportunities for health gain from the proposed development. This would include opportunities to create recreational spaces, opportunities to increase physical exercise through walking and cycle routes. Where possible, pedestrian areas should be accessible to wheelchairs, pushchairs and mobility vehicles in order that all ages and all levels of mobility can access the improved recreational amenities.

4. Population and Human Health

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

Consideration of Population and Human Health should be undertaken in a proportionate manner that is specific to the proposed development and focused on any likely significant effects on population health arising through environmental exposure pathways.

In particular, consideration should be given to:

- Any likely significant effects arising from exposure to noise and vibration during construction and operation;
- Any likely exposure to shadow flicker during operation;
- Any likely significant reduction in air quality during construction, including dust emissions and vehicle-related emissions;
- Protection of surface water and groundwater resources from contamination arising from hydrocarbon spillages, sediment runoff or other construction-related activities; and
- Potential effects on residential amenity, community wellbeing, accessibility and quality of life.

The principal population health pathways identified for this development relate to noise and vibration, shadow flicker, dust and air quality, traffic and road safety, protection of drinking water supplies, residential amenity, and community wellbeing. These pathways are considered in greater detail within the relevant sections of this submission.

The NEHS notes that population health effects may arise from the combined influence of multiple environmental stressors, including noise, traffic, dust, visual change and temporary disturbance.

While these effects are assessed separately within the EIAR, consideration should also be given to their cumulative influence on residential amenity, quality of life and community wellbeing.

It is the opinion of the NEHS that the EIAR has identified these principal environmental health pathways and has assessed them within the relevant chapters of the EIAR. The NEHS recommends that An Coimisiún Pleanála consider Chapter 5 of the EIAR, with particular regard to emissions to the environment, population exposure pathways, and the evaluation of potential health effects against recognised health protection standards.

5. Noise & Vibration

As outlined earlier in the report, the receiving environment is predominantly rural in character, comprising dispersed residential development alongside agricultural land use, commercial forestry, and existing renewable energy infrastructure. The surrounding local road network supports a number of detached dwellings, farmhouses, and traditional cottages, many accessed via narrow private laneways. While precise separation distances between all residences and individual turbine locations cannot be confirmed through general observations alone, the EIAR indicates that several properties lie within the wider zone of influence of the proposed development. In the context of a low ambient noise environment typical of rural areas, the receiving environment is considered sensitive to potential effects associated with construction activity, traffic movements, and operational turbine noise.

A number of community receptors are also present in the wider area, including Cloonanaha National School (approximately 1.4 km east of the nearest turbine) and Rockmount National School (approximately 3 km away), together with associated recreational facilities, places of worship, and burial grounds. While these receptors are outside the immediate development footprint, they may experience temporary disturbance during construction activities, particularly in relation to traffic, noise, and general construction activity.

The wider area is characterised by low levels of industrial activity, with agriculture, forestry, and renewable energy representing the dominant land uses. Notwithstanding the presence of existing wind energy development, the area retains a predominantly rural character, and residential amenity remains an important consideration.

From an NEHS perspective, the principal potential effects relate to residential amenity, including noise annoyance, sleep disturbance, and general community wellbeing during both construction and operational phases.

The Noise and Vibration Chapter of the EIAR assesses potential impacts in accordance with relevant guidance, including the Wind Energy Development Guidelines for Planning Authorities (2006), ETSU-R-97, and the Institute of Acoustics Good Practice Guide. It concludes that the proposed development can operate within applicable noise limits and that significant adverse operational effects are not anticipated, subject to the implementation of mitigation and operational controls.

Given the rural setting and low background noise environment, the area remains sensitive to changes in noise climate, and the protection of residential amenity is considered an ongoing key consideration across all phases of the development.

6. Construction Noise, Vibration and Rock Breaking

Construction activities, including excavation, heavy vehicle movements, and rock breaking where required, have the potential to generate short-term noise and vibration impacts at nearby residential receptors.

Rock breaking may be required during foundation works in areas of hard ground conditions; however, predicted noise levels are expected to reduce with distance and are not anticipated to result in significant environmental or health effects at surrounding dwellings.

Notwithstanding this, best practice mitigation measures should be implemented throughout the construction phase to minimise disturbance, including appropriate working methods, vibration control, and the use of temporary screening where practicable.

Observations (Construction Noise)

The EIAR outlines proposed construction working hours and associated mitigation measures. The NEHS considers that enforceable restrictions on construction operating hours are necessary to

minimise noise disturbance to nearby residents and to protect residential amenity, quality of life and community wellbeing.

Construction working hours should generally be restricted to:

- **Monday to Friday: 07:00–19:00**
- **Saturday: 08:00–13:00**
- **Sundays and Public Holidays: No noisy construction activities**

Any deviation from these hours should be subject to prior approval by the Planning Authority. Additional controls should include monitoring where necessary, protection of sensitive receptors such as schools where practicable, and implementation of cumulative impact mitigation measures identified in the EIAR.

The NEHS is of the opinion that subject to the implementation of appropriate mitigation measures and operational controls, significant adverse effects arising from noise, vibration, or construction activities are not anticipated. The proposed measures are considered sufficient to protect residential amenity, community wellbeing, and population health throughout the construction, operational, and decommissioning phases of the development.

7. Shadow Flicker

The EIAR assesses shadow flicker for properties within 1.5 km of the proposed turbines, identifying 74 properties within the study area, with 28 predicted to experience shadow flicker under worst-case modelling assumptions.

The assessment adopts conservative assumptions, including unobstructed turbine visibility, absence of screening, continuous turbine operation during sunlight hours, and favorable meteorological conditions. As such, predicted impacts are considered to represent a theoretical worst-case scenario and are likely to overestimate actual exposure.

The principal receptors are residential dwellings, where effects relate primarily to amenity, visual disturbance, and potential annoyance. The Applicant proposes mitigation through automated turbine control systems and operational curtailment, designed to ensure compliance with accepted guideline thresholds (30 hours per year and 30 minutes per day).

The NEHS recommends that the shadow flicker mitigation measures identified in the EIAR be secured by condition through a Shadow Flicker Management Plan. This should include:

- **Identification of all potentially affected residential receptors**
- **Receptor-specific assessment where required**
- **Automated turbine shut-down/curtailment systems**
- **Monitoring and verification procedures**
- **Complaint investigation and response procedures**
- **Periodic review of mitigation effectiveness**

Subject to these measures, significant adverse effects on residential amenity, community wellbeing, or population health are not anticipated.

8. Land, Soils and Geology

Chapter 8 of the EIAR addresses Land, Soils, and Geology and identifies that the proposed development would result primarily in temporary and localised effects during construction. These relate to excavation works, soil disturbance, erosion risk, and the potential for accidental spillages. A range of standard mitigation measures are proposed to minimise these effects, and the chapter concludes that, with these measures in place, residual impacts on land, soils, and geology are not expected to be significant.

From a population and human health perspective, NEHS notes that significant long-term effects are unlikely provided that best practice construction management, drainage controls, and environmental monitoring are implemented effectively. However, it is acknowledged that a worst-case pollution event, such as the release of fuels, oils, sediments, or contaminated runoff, could affect surrounding soils, groundwater, or downstream watercourses. Such an event could have

indirect implications for human health through potential impacts on private water supplies, drinking water quality, and local environmental amenity.

The EIAR also assesses temporary construction-phase effects separately, including dust, noise, vibration, and increased traffic. These may result in short-term disturbance to nearby residents, including potentially sensitive or vulnerable groups, particularly during peak construction activities. The site is located within a peat-influenced upland catchment associated with the Glendine River system and is hydrologically connected to sensitive surface water features. General observations confirm a mixture of peatland and commercial forestry, the presence of drainage features across upland terrain, and the likely occurrence of dispersed private water supplies in the surrounding area.

In this context, the risks include sediment run-off, hydrocarbon spillages, peat instability during excavation, and potential impacts on private groundwater abstractions. To address these risks, the EIAR provides for a range of mitigation measures, including identification of all private water supplies within the zone of influence prior to construction, baseline water quality monitoring, protection of wells and boreholes, implementation of robust drainage and sediment control measures, and defined pollution incident response procedures. Subject to the effective implementation of these measures, significant adverse effects on water quality and associated population and human health receptors are not anticipated.

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.

9. Hydrology & Hydrogeology

The NEHS has considered Chapter 9 of the EIAR, which assesses the potential impacts of the proposed development on the water environment, including surface water and groundwater resources.

The proposed Slieveacurry Wind Farm is located approximately 6.5 km east of Miltown Malbay and lies within the Glendine River catchment, a hydrologically sensitive upland environment characterised by peatland habitats, drainage networks and associated watercourses. The Glendine River flows through upland and bog habitats connected to the site, highlighting the importance of protecting both surface water and groundwater resources throughout the construction, operational and decommissioning phases of the development.

From a Population and Human Health perspective, the protection of drinking water sources is a key consideration. Construction activities have the potential to affect water quality through increased sediment loading, accidental fuel or chemical spills, or the mobilisation of contaminants, which could impact groundwater and surface water resources used for drinking water purposes.

The surrounding area contains dispersed rural residential development and it is likely that a proportion of dwellings rely on private groundwater supplies. The Non-Technical Summary (NTS) states that a search of private well locations was undertaken using the Geological Survey Ireland (GSI) well database and that several wells were identified within the surrounding area. However, the report also acknowledges limitations in the available data, with many records having poor locational accuracy and some recorded to an accuracy of greater than 50 metres. Consequently, there remains potential for unidentified private drinking water supplies to be present within the zone of influence of the proposed development.

There are no mapped groundwater source protection areas within the immediate vicinity of the site. The nearest mapped Group Water Scheme is the Kilmaley/Inagh Group Water Scheme, located approximately 5 km southeast of the proposed development. Historically, areas to the north of Miltown Malbay were supplied by water from the Rockmount Water Treatment Plant, which is understood to have sourced water from Lough Keagh. The treatment facilities have since been decommissioned and replaced by supply from the Old Doolough Water Treatment Plant. A new concrete storage reservoir was constructed at Rockmount in 2022 and now provides treated water storage and network resilience for the area.

The NEHS recommends that a comprehensive survey of private drinking water supplies, including wells, springs and boreholes, be undertaken within the potential zone of influence of both the proposed wind farm and associated grid connection infrastructure prior to the commencement of construction works. Any identified private water supplies should be subject to baseline water quality monitoring and, where appropriate, water quantity monitoring to establish existing conditions and facilitate the identification of any project-related impacts.

The NEHS further recommends that a Water Protection Plan be prepared and implemented to identify and protect sensitive water receptors, including:

- Private wells;
- Springs;
- Boreholes;
- Group Water Schemes;
- Surface water receptors used for drinking water abstraction or supporting drinking water sources; and
- Pollution prevention, incident response and remediation measures.

Baseline water quality monitoring should be undertaken prior to construction and repeated, where appropriate, throughout the construction phase. Any private water supply identified within the zone of influence should be included in the monitoring programme where a risk of impact exists.

Subject to the identification and protection of all drinking water receptors, together with the robust implementation of the proposed mitigation measures, monitoring programme and management controls, significant adverse impacts on drinking water quality or drinking water supplies, and consequently on population and human health, are not anticipated.

Where a private water supply is identified as being adversely affected by construction activities, the developer should provide an alternative potable water supply pending remediation and restoration of the original source.

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

10. Traffic and Access

The proposed development will utilise a network of existing local rural roads and access infrastructure during the construction phase. A general assessment of the area undertaken by the NEHS observed that the surrounding road network comprises predominantly local rural roads, many of which are unnamed and rural in character. The roads are narrow, winding and constrained in places, with limited opportunities for passing traffic. Road surfaces vary between tarmac and compacted gravel, and while localised repairs to potholes have been undertaken, there is limited evidence of more extensive resurfacing. The condition of some road surfaces, passing bays and pull-in lay-bys appeared to be poor in places, with some locations exhibiting signs of wear and deterioration.

From the NEHS perspective, the characteristics of the local road network increase the potential for construction-related traffic, including heavy goods vehicles and abnormal loads associated with turbine component delivery, to affect road users and nearby communities. Potential impacts include effects on road safety, residential amenity, local accessibility, school transport routes, agricultural activities, and emergency service access. Increased traffic volumes and the movement of oversized vehicles on narrow rural roads may also contribute to driver stress, delays, temporary disruption, and reduced perceived safety among local residents.

The NEHS considers that the implementation of a comprehensive Construction Traffic Management Plan (CTMP) is essential to minimise potential impacts on population health and community wellbeing. The CTMP should include:

- Approved haulage routes;
- Traffic scheduling and delivery management measures;

- Pre-construction and post-construction road condition surveys;
- Measures to protect vulnerable road users and school transport services;
- Emergency access and contingency arrangements;
- Procedures for community notification and communication regarding significant traffic movements;
- Arrangements for the maintenance and repair of road surfaces and passing bays where damage occurs as a result of construction traffic.
- Particular consideration should be given to avoiding school opening and closing times, where practicable, and to minimising disruption to local residents, agricultural activities and other road users throughout the construction period.
- Measures to protect active road users, including pedestrians, cyclists and horse riders.

The NEHS considers that, subject to the implementation, monitoring, and enforcement of an appropriately designed Construction Traffic Management Plan, significant adverse effects on population health, community wellbeing, road safety, and local accessibility are unlikely to occur.

11. Construction Environmental Management Plan (CEMP)

The NTS states that a Construction Environmental Management Plan (CEMP) will be implemented throughout the construction phase (Appendix 4-5). 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 4-5 of the EIAR and considers it to provide a comprehensive framework for environmental management during the construction phase. Adequate protection of public and environmental health can be achieved provided all mitigation measures are fully implemented, monitored, maintained and enforced.

The CEMP includes measures requiring construction and operational lighting to be designed so as to minimise unnecessary light spill. In addition to the ecological lighting controls identified in the CEMP, construction lighting should be managed, where required, to minimise light spill towards nearby residential properties and to avoid unnecessary impacts on residential amenity and sleep quality.

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 European Union (Drinking Water) Regulations 2023 (S.I. No. 99 of 2023), as amended.
- There should be no direct emission to ground or surface water of any foul wastewater. There should be no direct discharge of foul wastewater to ground or surface waters. Foul wastewater should be appropriately contained and managed in accordance with the CEMP and removed to an authorised treatment facility where required.
- Measures for site drainage and protection of surface water and groundwater during the construction phase are detailed within the CEMP. The NEHS has no additional comments.
- The dust monitoring is a monthly average standard. Compliance with the standard can incorporate short periods of elevated dust deposition followed by lower levels while

remaining 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 that adequate protection of Public and Environmental Health can be achieved during the construction phase, provided all mitigation measures identified are implemented, monitored and maintained in full.

12. 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. 853/2004, 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). NEHS recommends that early engagement with the appropriate registering authority is undertaken to ensure compliance with Tobacco legislation.

13. 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. Community communication and notification: The existing Community Liaison Officer (CLO) arrangements should be maintained throughout the construction and operational phases of the development. Advance notification should be provided to residents and other affected stakeholders regarding abnormal load deliveries, road closures, rock breaking activities, and other potentially disruptive construction works.
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. 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.
4. Protection and Restoration of Private Water Supplies: Where monitoring identifies a project-related deterioration in the quality or quantity of a private water supply, a suitable alternative water supply should be provided until the original supply has been restored to its baseline condition.
5. 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.

6. Emergency medical access: Continuous access for emergency services should be maintained to all nearby dwellings, farms, and schools throughout all phases of the development.
7. 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.

8. 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. Independent operational noise monitoring and a complaint investigation and response procedure should be implemented where required by the Planning Authority
9. 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.
10. Shadow Flicker Management Plan: Incorporating predictive modelling, monitoring, turbine curtailment protocols, complaint investigation and annual review.
11. 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.
12. Good Housekeeping and Pest Prevention Measures: Appropriate waste management, housekeeping and pest prevention measures should be implemented within temporary construction compounds and welfare facilities to prevent the attraction of rodents and other nuisance pests.
13. Complaints management system: A formal complaints management and response procedure should be maintained throughout the construction phase, including investigation, recording, corrective action and feedback to complainants in relation to noise, dust, traffic, lighting and general residential amenity issues.
14. Cumulative effects: Any mitigation measures identified within the EIAR to address cumulative effects should be implemented and maintained throughout the life of the development. Particular regard should be given to cumulative impacts on residential amenity, community wellbeing, noise exposure and traffic-related disturbance.
15. Food Safety Legislation: Compliance with Regulation (EC) No. 852/2004 should be ensured where any temporary food preparation, catering or canteen facilities are provided.
16. Tobacco Legislation: Any smoking shelters provided should comply with Section 47 of the Public Health (Tobacco) Act 2004, as amended.

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,

Kathleen Lydon

Principal Environmental Health Officer

