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Cc: [Sligo Peho](#); [Aine Messenger](#)
Subject: Planning Reference 324290 submission report for Lissinagroagh Wind Farm, EIAR (Strategic Infrastructure Development)
Date: Wednesday 8 July 2026 16:30:43
Attachments: [image001.png](#)
[Submission Report for Proposed SID Lissinagroagh Wind Farm EH 5967.pdf](#)

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Please see attached submission report for Lissinagroagh Wind Farm, EIAR (Strategic Infrastructure Development) application for the proposed windfarm development in Co. Leitrim. Reference No. 324290

Kind regards

Marie

Marie Matthews

Príomhoifigeach Sláinte Comhshaoil
Principal Environmental Health Officer.

FSS Seirbhís Náisiúnta Sláinte Comhshaoil / Sligeach / Liatroma / Iarthar an Chabháin
HSE National Environmental Health Service Sligo/Leitrim /West Cavan,
Oifigeach Sláinte Comhshaoil/ Naomh Columba, Bóthar Clarion, Sligeach F91 CD34
Columba's Campus, Clarion Road, Sligo, F91 CD34.

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National Environmental Health Service Submission Report

*(as a Statutory Consultee under Article 28 of the Planning and Development Act
2000 (as amended) & Regulations made thereunder)*

Date: 8th July 2026

Type of consultation: Environmental Impact Assessment Report (EIAR)

Planning Reference No.: 324290

EHIS Reference No: 5967

Report to: An Coimisiún Pleanála

Applicant: FuturEnergy Ireland

Name of Proposed Development: Lissinagroagh Wind Farm

Description of Proposed Development: A planning application for a 10-year permission for a proposed construction of a Lissinagroagh Wind Farm consisting of 14 wind turbines and all associated infrastructure at a site located in Boleyboy, Cashelaveela, Cherrybrook, Coolodonnell, Faughary, Killea, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle, and Tullyskeherny, Co. Leitrim.

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 19th May 2026:

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



General

The HSE is a statutory consultee under Article 28 of the Planning and Development Act 2000 (as amended) and has a remit to make observations on a planning application accompanied by an EIAR with regard to any likely significant effects on Public Health. The National Environmental Health Service (NEHS) can make observations on any planning application as a statutory consultee.

The objective of any observations by the NEHS are to inform the Planning Authority on any likely significant effects on Public Health and give an opinion on any proposed mitigation to protect Public and Environmental Health. Any observations made are to inform and assist the decision making of the Planning Authority in the planning process.

This submission is the observations and comments of the NEHS based on the submitted planning application and the accompanying Environmental Impact Assessment Report (EIAR). The NEHS does not carry out any independent environmental monitoring or validation of any measurements or data reproduced in an EIAR.



Description of Proposed Development:

FuturEnergy Lissinagroagh Designated Activity Company is applying to An Coimisiún Pleanála (ACP) for planning permission to construct the proposed Lissinagroagh Wind Farm project located at Boleyboy, Cashelaveela, Cherrybrook, Coolodonnell, Faughary, Killea, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle, and Tullyskeherny in County Leitrim.

The proposed project comprises:

- A wind farm containing fourteen (14) wind turbines, turbine foundations and crane hardstands
- Infrastructure ancillary to the wind farm including accesses from public roads, access tracks within the wind farm, borrow pits, site compounds, drainage and a turbine delivery route
- An on-site 110 kilovolt (kV) substation
- An underground 110 kV grid connection to a the ESB Srananagh substation in Co. Sligo.

The purpose of the Proposed Project is to provide 77–100 MW of renewable electricity to the National Grid.

Site Location and Site Visit by NEHS

The site is described in the Non-Technical Summary as being located approximately 3 km northeast of the town of Manorhamilton. It is also located in close proximity to the Northern Ireland border in County Fermanagh, which is approximately 3 km to the north.

The topography of the wind farm site varies from around 170 metres Ordnance Datum (mOD) to 380 mOD. The highest points are found in the northeastern areas, while the southwestern corner has the lowest elevation.

The land use/activities within the site are primarily commercial forestry, with expanses of wet grassland in the centre, northwest and southeast and upland blanket bog/open peatland particularly in the north and northwest. Coillte forestry within the site comprises different stages of coniferous plantation forestry including recent clear-fell, second rotation, immature, semi-mature and mature forestry.

A visit to the site of the proposed development was carried out by an Environmental Health Officer in late May 2026. During the visit, the site was approached from the Southwest, Southeast and Northeast. Three wind turbines from Faughary Wind farm can be seen from the road L61801 and a further 4 turbines, possibly Carrickeeny Wind Farm can also be seen in the distance.



Site notices as required by the Planning and Development Act 2000 were observed on all 3 approaches: all in good condition.

There are numerous Coillte managed lands consisting of coniferous plantations in these areas consequently the access roads leading to these are in relatively good condition. However, the condition and width of the roads deteriorate and narrow upon climbing the mountain, until they become single track. Warning signs about lorries exiting and road condition were noted on the North Easterly approach.

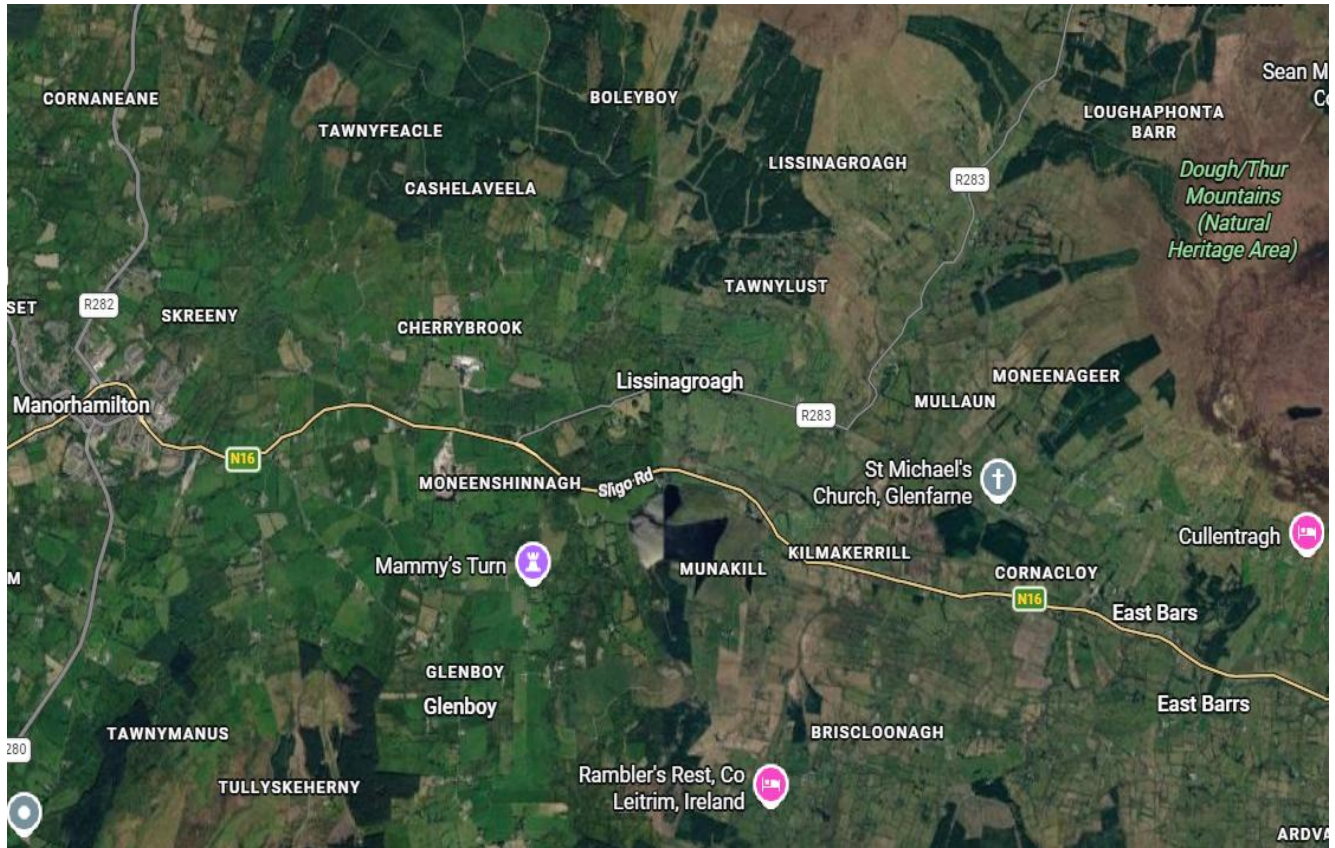
The only other witnessed commercial use of this land was for grazing. Cycling trails are well signposted and there are numerous walking trails in the area.

Regarding sensitive receptors, there are sporadic domestic dwellings and occasional farms at the bases of the 3 approaches. On the slopes of Lissinagroagh Mountain, only occasional derelict dwellings were observed.

Our Lady's Community Hospital, Arus Breffni Nursing Home, a secondary and several national schools, childcare facilities, numerous food businesses and a sizeable resident population are all located in Manorhamilton approximately 2/3 km northeast of the site, which is the second largest town by population in Co. Leitrim.

The proposed wind farm development spreads across an area that feeds into a few river catchments, primarily the Owenbeg river and the Cornavannoge River and these have been identified in the Aquatic Report.

The local office has not received any complaints regarding this development.



Criteria for Consideration of Likely Significant Effects on Public Health

The NEHS considers likely significant effects on Public Health as per the EPA issued National Guidance (known as the EIAR Guidance): Guidelines on the information to be contained in Environmental Impact Assessment Reports, 2022

https://www.epa.ie/publications/monitoring--assessment/assessment/EIAR_Guidelines_2022_Web.pdf

Particularly section 3 of the EIAR Guidance on Human Health which is reproduced below:



Human Health

The recitals to the 1985 and 2011 Directives refer to 'Human Health' and include 'Human Beings' as the corresponding environmental factor. The 2014 Directive calls this factor 'Population and Human Health'.

While no specific guidance on the meaning of the term Human Health has been issued in the context of Directive 2014/52/EU, the same term was used in the SEA Directive (2001/42/EC). The Commission's SEA Implementation Guidance states 'The notion of human health should be considered in the context of the other issues mentioned in paragraph (f)'. (Paragraph (f)⁴⁷ lists the environmental factors including soils, water, air etc). This is consistent with the approach set out in the 2002 EPA EIS Guidelines where health was considered through assessment of the environmental pathways through which it could be affected, such as air, water or soil, namely:

'The evaluation of effects on these pathways is carried out by reference to accepted standards (usually international) of safety in dose, exposure or risk. These standards are in turn based upon medical and scientific investigation of the direct effects on health of the individual substance, effect or risk. This practice of reliance upon limits, doses and thresholds for environmental pathways, such as air, water or soil, provides robust and reliable health protectors [protection criteria] for analysis relating to the environment.'

In an EIAR, the assessment of impacts on population & human health should refer to the assessments of those factors under which human health effects might occur, as addressed elsewhere in the EIAR e.g. under the environmental factors of air, water, soil etc.. The Advice Notes provide further discussion of how this can be addressed.

Assessment of other health & safety issues are carried out under other EU Directives, as relevant. These may include reports prepared under the Industrial Emissions, Waste Framework, Landfill, Strategic Environmental Assessment, Seveso III, Water Framework Directive, Floods or Nuclear Safety Directives⁴⁸. In keeping with the requirement of the amended Directive, an EIAR should take account of the results of such assessments without duplicating them.

The NEHS therefore considers likely significant effects within a population and Human Health context that uses a source – pathway - receptor model, based on emissions through environmental media and population exposure. The exposure of populations, if any, is then considered against recognised health protection criteria.

Whilst EIAR Guidance recognises the requirement to identify sensitive receptors within the assessment process, the Planning Authority should be clear that it is within a Population Health approach.

A Population Health approach to the sensitivity of receptors would not consider individual specific sensitivity of a human receptor, but the sensitivity of the established land use or service provision. For example, a school would be considered a sensitive receptor within a Population Health approach, but an individual student who was particularly sensitive to noise attending the



school would not be specifically considered in the assessment criteria. A health care facility that provided services for people with recognised noise sensitivity would be considered in its entirety as a particular noise sensitive location.

It is recommended that the Planning Authority also follows this method when considering likely significant effects on Population and Human Health in their decision-making process.

Opportunities for Health Gain

NEHS recommends that the community fund should facilitate infrastructure for everyone and not only funding existing organizations. 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.

Project Specific Guidance for Wind Energy Development

The current Guidelines for Wind Energy Development are: Wind Energy Development Guidelines (2006) <https://www.gov.ie/en/publication/f449e-windenergy-development-guidelines-2006/>

It is recognised that the nature of wind energy development has significantly changed since the publication of these Guidelines, particularly the size of the turbines and the proximity to centres of populations and the cumulative effects with other wind energy development. There have also been substantial increases in the body of knowledge around any likely significant effects from the operation of a wind farm development on Population Health, in particular around the characteristic of the noise emissions and health effects of shadow flicker.

A revision of the 2006 GWED commenced in 2013 and Draft Revised Wind Energy Development Guidelines were issued in December 2019. <https://www.gov.ie/en/publication/9d0f66-draft-revised-wind-energy-developmentguidelines-december-2019/> . These are yet to be adopted.

The Revised WEDG 2019 states ‘the revised guidelines will provide greater consistency of approach in planning for onshore wind energy development, as well as providing greater certainty and clarity to the planning system, to the wind industry and to local communities.



The NEHS is aware of the High Court decision in **Webster/Rollo V Meenaclogher (Wind) Limited (2024 IEHC 136) 8th March 2024**, and details of the judgement. The judgement that the noise from the wind farm was a Private Nuisance is a predominately health-based assessment, in that the elements that were deemed to create the nuisance were directly related to health effects on the complainants. It is the understanding of the NEHS that assessment of compliance with health protection conditions set in the consent process was not a material consideration in the judgement. The judge did state that she could consider nuisance irrespective of any compliance with consent conditions, particularly in the absence of up-to-date National Policy and Guidance in the area. The Judgement also states that the revised Draft Guidance has been withdrawn. There is no public indication this is the case. It is still on the Department's website as of the date of this submission.

Nuisance from noise is fundamentally a subjective assessment based on 'reasonable' perception and reaction of the effects of the noise exposure. This perception and reaction depend on situational specific conditions and land use. This was recognised in the Judgement after 51 days of evidence and consideration of the specific facts. It also the understanding of the NEHS that the Judgement did not make an order as to the level or characteristic of the noise that would abate the nuisance.

If the Planning Authority are now considering that they are under a duty to incorporate the likelihood of a private nuisance into their decision making, then they should consider the judgement in Webster/Rollo V Meenaclogher (Wind) Limited (2024 IEHC 136) 8th March 2024. This judgement identified, in the absence of Irish Guidance, the usefulness of UK Guidance in the investigation of wind farm noise as a statutory nuisance. This is, of course, a reactionary methodology where specific noise exposure is known and not a predictive methodology for the likelihood of a private nuisance.

<https://assets.publishing.service.gov.uk/media/5a795184e5274a3864fd5f82/pb-13584-windfarm-noise-statutory-nuisance.pdf>

Cumulative Impacts:

The NEHS recommends that while all existing or proposed wind farm developments in the vicinity have been clearly identified in the EIAR, the mitigation of cumulative impacts on sensitive receptors of the proposed development combined with any other wind farm/renewable energy developments in the vicinity should be a condition of planning approval.

Chapter 7 - Geology:

The process outlined in the EIAR Chapter 7 identified soils and geology receptors that could potentially be affected by the project. The potential



significant effects which have been assessed for the area, including the degradation of peatland habitat associated with peat instability, drainage impacts, and dust deposition.

A Peat Stability Risk Assessment (PRSA) was carried out in accordance with Peat Landslide Hazard and Risk Assessments, Best Practice Guide for Proposed Electricity Generation Developments – Second edition (Scottish Government, 2017). The report sets out the methodology used to assess the peat stability risk, the activities undertaken, and the results of the peat stability assessment.

The PRSA indicates a “low” to “negligible” hazard ranking for instability. The nearest wind farm infrastructure is located approximately 80 m from the boundary of the Dough/Thur Mountains Natural Habitat Area, exceeding the 30 m buffer recommended to avoid indirect hydrological impacts on peatlands.

Following application of mitigation measures such as detailed site assessment, planning stage micro siting of infrastructure to minimise risk, site-specific temporary and permanent works designs for areas of deeper peat and steeper slopes, monitoring, and commonplace mitigation measures such as careful construction supervision for the other areas of the site the findings of the planning stage PSRA indicate a “low” to “negligible” hazard ranking for instability related to the requirement for excavations on the site. It is concluded that the site is suitable for the proposed development.

Deterministic stability assessments indicate that the materials are considered to be stable in the short (undrained) and long (drained) term, including under the influence of weather events where the peat becomes partially saturated, hence justifying the “low” to “negligible” hazard rankings assigned.

The NEHS recommends that if planning permission for this development is granted, that it includes protective conditions for peatlands in the area. Also, it should ensure measures are taken to prevent events that occur as a result of development in the area, such as peat slide.

Chapter 9 - Likely Significant Effects from Noise and Vibration

The applicant advised that a noise impact assessment was carried out to assess the potential noise and vibration effects on the surrounding environment for three stages: the short-term construction phase and decommissioning phases, and the long-term operational phase.

The environmental noise survey was conducted to establish the existing baseline and background noise levels in the receiving environment. This was achieved through simultaneous wind measurements and noise monitoring over several weeks, capturing noise levels across a representative set of wind speeds and directions.



The Construction and Environmental Management Plan (CEMP) include specific mitigation where required. The applicant states that there will be no significant noise and vibration impacts associated with the construction phase. The noise from construction activity at the nearest Noise Sensitive Locations (NSLs) is expected to be below recommended threshold values.

The results of the background noise survey have been used to derive appropriate operational turbine noise limits for the assessment of the development in line with the guidance contained in the 2006 Wind Energy Development Guidelines (WEDG06).

The findings of the assessment, presented in the EIAR has confirmed that the predicted operational noise levels associated with the proposed project will be within best practice turbine noise criteria. The applicant states that there will be no significant cumulative impacts related to noise from the operation of the windfarm.

The applicant states that the proposed substation, fixed plant and grid connections are not expected to result in significant noise or vibration effects at noise sensitive locations.

The developer will submit a Noise Compliance Monitoring Programme (NCMP) to the planning authority for written agreement. The NCMP will include a detailed methodology for all noise measurements, the frequency of monitoring, procedures for recording results and a protocol for managing complaints.

The NEHS has considered Chapter 9 of the EIAR.

- The Wind Energy Development Guidelines 2006 include guidance on how to derive noise limits for daytime and night-time periods, which can be summarised as: daytime limits take account of existing background noise levels and include a fixed limit of 45 dB, or background + 5 dB, whichever is the greater, except in low background noise environments where a fixed minimum limit in the range 35-40 dB should be considered.
- This criteria therefore requires that turbine noise at noise sensitive locations should not exceed for daytime periods: 40 dB(A) where background noise levels are below 30 dB; and, 45 dB(A) or background noise plus 5 dB, whichever is the greater, where background noise levels are greater than 30.
- This can potentially see a predicted increase of up to 15 dB(A) change in the noise environment as compliant with the criteria. Any change in the noise environment of this magnitude is highly likely to cause complaints and/or nuisance. **BS 4142:2014+A1:2019 Methods for rating and assessing industrial and commercial sound** identifies an increase of 10 dB above existing rated noise levels will have a significant adverse impact and is highly likely to cause complaints. The reference to BS4142 is purely to demonstrate that there are authoritative Standards that recognise a change in a noise environment can have significant adverse effects and a magnitude of 10 dB(A) would be considered significant.
- The evaluation of significance of an effect is based on the most up to date scientific knowledge and data. The EIA process specifically requires the



assessment to be 'the likely significant effects' and if the knowledge on an evaluation criteria of significance has developed since the publication of a guidance, then it is reasonable and correct to use the developed knowledge base in assessing the significance of any effect. This is particularly relevant to the protection of Public Health. Statutory Guidance issued under the Planning Development Act 2000 (as amended) has to be considered by the Planning Authority when making a decision, but it is not a consideration that precludes all other evidence and knowledge.

- In the opinion of the NEHS, tabulation of the predicted change in the noise environment from the proposed development and the cumulative change in the original baseline noise environment before any wind farm development in the area is the most informative way of reporting the likely effect of operational noise in an EIAR.
- The NEHS would consider the most appropriate criteria for assessing significance of the predicted noise is consideration of the ENVIRONMENTAL NOISE GUIDELINES for the European Region, 2018. The 2018 WHO Guidance set health protection levels from Environmental noise <https://iris.who.int/bitstream/handle/10665/279952/9789289053563-eng.pdf?sequence=1>
The WHO is the most authoritative body with regards to the evidence base that sets health protection standards. The NEHS would consider it appropriate for the Planning Authority to use the existing noise data to carry out an assessment against the WHO 2018 Guidance noise criteria. This should include cumulative noise impacts from existing and planned wind farm developments.
- It is the opinion of the NEHS that conditioning hours of construction activity is an important element of the protection of Public Health. Particularly to prevent sleep disturbance. The recommended hours of construction are:

Monday to Friday 08.00 to 19.00

Saturday 09.00 to 14.00

No work on Sunday or Bank Holidays

Exceptionally work outside these hours at the express permission of the Planning Authority. This recommendation is made in the interest of the protection of Public Health.

Chapter 10 – Population and Human Health - Shadow Flicker

Chapter 10 of the EIAR predicts shadow flicker being present and identifies mitigation measures which would be employed to control shadow flicker at any potentially affected properties to ensure compliance with the current adopted Wind Energy Development Guidelines 2006.



The Applicant has committed to 'near zero' shadow flicker. Near zero shadow flicker refers to the brief period that may occur while the turbine rotor comes to a safe stop. This duration is typically between 1 and 2 minutes, depending on the reaction time of the shadow flicker control system and the specific turbine model proposed. In the interest of transparency, the EIAR describes this residual effect as near zero shadow flicker, stating that it is not possible to eliminate the effect entirely.

The stricter requirements of the draft 2019 Wind Energy Guidelines state that mitigation measures should be employed to ensure compliance:

The adopted 2006 DoEHLG guidelines are currently under review. The DoEHLG released the *'Draft Revised Wind Energy Development Guidelines'* in December 2019 for public consultation. The Draft 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 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).

Any residual effects should be in compliance with both the 2006 Guidelines and the Draft Revised Wind Energy Development Guidelines (2019).

The NEHS welcomes the commitment to control any shadow flicker that may occur as a result of the proposed development and recommends that mitigation measures to eliminate shadow flicker are implemented. It is noted that implementation as described in Chapter 10 would only ensure there is compliance subject to the response time of the control system.

In the interest of the protection of Public Health, the requirements set out in the 2019 Draft Guidance should be implemented as a condition and not just "regarded as stated in the EIAR, if permission is granted for this development. The technology has advanced since the publication of the 2006 Guidance and it is a reasonable health protection measure to be included in any conditioning of a wind farm development.

Chapter 16 Traffic and Transportation

The NEHS has considered Chapter 16 of the EIAR and the traffic management plan that outlines the mitigation measures for the duration of the project.



The NEHS is satisfied there will be adequate protection of Public and Environmental Health in the traffic management plan if all the mitigation measures are implemented in full.

Appendix 2.4 Construction and Environmental Management Plan (CEMP)

The NEHS has considered the CEMP in Appendix 2.4 and the mitigation for the construction phase.

Additional considerations in the interest of the protection of Public Health:

- a) 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.
- b) 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.
- c) Site drainage should ensure the protection of surface and ground water during the construction phase.
- d) 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. It is noted that a Dust management plan is part of the CEMP.

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

Yours Sincerely,

A handwritten signature in dark ink, appearing to read 'Marie Matthews'.

Marie Matthews
Principal Environmental Health Officer
HSE National Environmental Health
Service