

## Tushaline Sahseetharan

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**From:** SIDS  
**Sent:** Wednesday, September 16, 2026 12:25 PM  
**To:** Tushaline Sahseetharan  
**Subject:** FW: NEHS Submission - EIAR for proposed substation and associated site development works at Kiltotan and Collinstown, Co. Westmeath EHIS REF 6103  
**Attachments:** Submission Report for Proposed Substation in Westmeath EH6103.pdf

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**From:** Coffey, Enda <Enda.Coffey@hse.ie>  
**Sent:** Tuesday 18 August 2026 14:46  
**To:** SIDS <sids@pleanala.ie>  
**Cc:** PEHO Longwest <PEHO.LongWest@hse.ie>; AVERIL EGAN <Averil.Egan@hse.ie>; John Soden <John.Soden@hse.ie>; Deirdre O'Shea <Deirdre.OShea@hse.ie>; Doonan, Patricia <Patricia.Doonan@hse.ie>  
**Subject:** NEHS Submission - EIAR for proposed substation and associated site development works at Kiltotan and Collinstown, Co. Westmeath EHIS REF 6103

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Dear Sir / Madam,  
Please see attached submission from the National Environmental Health Service in respect of the proposed substation and associated site development works at Kiltotan and Collinstown, Co. Westmeath EHIS REF 6103.  
Should you have any queries, please let me know.

Best Regards,

*Enda*

**Enda Coffey**  
Oifigeach Sláinte Comhshaoil Sinsear | Senior Environmental Health Officer

Seirbhís Sláinte Comhshaoil Náisiúnta, FSS Baile Átha Cliath & Lár Laighin, Aonad Ionad Cúram Príomhúil, Chluain Bhorraisc, Baile Átha Luain, Co. na hIarmhí N37 P8P8

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

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

**Date:** 14th August 2026

**Type of consultation:** Strategic Infrastructure Development (SID) with an EIAR

**Report to:** An Coimisiún Pleanála (ACP)  
Email: [sids@pleanala.ie](mailto:sids@pleanala.ie)

**Planning Case Reference No.:** 322430

**Our Reference No.** EHIS 6103

**Applicant:** Red Admiral DC Limited

**Description of Proposed Development:** Proposed 220kV Gas Insulated Switchgear Substation, High Voltage Lines and Electric Plant and associated Site Development Works located at townlands of Kiltotan & Collinstown, Oldtown and Farthingstown, Co. Westmeath.

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 6<sup>th</sup> July 2026:

- Emergency Planning
- National Capital Estates Office
- Director of National Health Protection
- REO Dublin & Midlands

### **1. Introduction**

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

The objective of any observations made by the NEHS is 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 NEHS submission report is based on an assessment of documentation submitted with the planning application, particularly the accompanying EIAR.

All commitments to future actions including mitigation and further testing have been taken as read and all data results have been accepted as accurate.

- No additional investigations/measurements were undertaken by the NEHS.
- This report refers only to those sections of the application documents that are relevant to the NEHS, which have likely significant environmental health or public health impacts.

### 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: 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 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)<sup>47</sup> 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<sup>48</sup>. In keeping with the requirement of the amended Directive, an EIAR should take account of the results of such assessments without duplicating them.

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

Whilst EIAR guidance recognises the requirement to identify sensitive receptors within the assessment process, the planning authority should be clear that it is within a population health approach.

A population health approach to the sensitivity of receptors would not consider individual specific sensitivity of a human receptor, but the sensitivity of the established land use or service provision. For example, a school would be considered a sensitive receptor within a Population Health approach, but an individual student who was particularly sensitive to noise attending the school would not be specifically considered in the assessment criteria. The exception would be a health care facility that provided services for people with recognised noise sensitivity would be considered in its entirety as a particular noise sensitive location. This is a crucial point, as there are a number of sensitive receptors near the proposed development.

The population health approach therefore has important differences in how likely significant effects on population and human health are considered in EIA. The assessment should consider established land development and use, service provision and activities within communities (not individual members of communities).

**It is recommended that the planning authority follows this method when considering public health in their decision-making.**

This report only comments on environmental health impacts of the proposed development as outlined in the EIAR and the adequacy of the EIAR from the environmental health viewpoint. The NEHS has made observations and submissions on the following specific environmental health areas.

- Public Consultation
- Water
- Noise and Vibration
- Air Quality
- Food Safety and Environmental Compliance
- Construction Environmental Management Plan (CEMP).

## **2. Description of the Project**

Red Admiral DC Limited are applying for planning permission for a project on lands with an area of c.243 hectares in the townlands of Gneevebane, Oldtown, Farthingstown, Castlelost and Kiltotan and Collinstown in the south of County Westmeath. The applicant is seeking a ten-year planning approval.

Proposed Development:

Red Admiral DC Limited is applying for planning permission for the construction of a 220kV Gas Insulated Switchgear (GIS) substation, associated high voltage lines (HV), electric plant, and ancillary site development works.

The Proposed Development adjoins a proposed Data Centre facility and Decentralised Energy Resource, which are subject to separate concurrent planning applications with Westmeath County Council. The proposed development will connect to the existing and adjacent electricity transmission system (Castlelost 220kV GIS substation) and the aforementioned Data Centre facility and DER.

The proposed development will include:

- (i) a new two-storey IPP 220kV GIS substation building containing battery room, WC, messroom, workshop, generator room, stair cores, cable pits, storeroom, and switchgear rooms within a palisade fenced compound;
- (ii) all HV circuits which will connect the proposed IPP 220kV GIS substation to the existing Castlelost 220kV GIS substation and to Air Insulated Switchgear (AIS) compounds and electric plant associated with the Decentralised Energy Resource (DER) (WCC Planning Application Number 25/60344); including a solar farm, battery energy storage system (BESS) and a solid oxide fuel cell (SOFC);
- (iii) a 36.0m high communications tower;
- (iv) temporary construction compounds;
- (v) a main entrance connecting to the R446 public road,
- (vi) demolition and removal of existing derelict dwellings, outhouses and agricultural sheds;
- (vii) all ancillary development including new internal roads, security fencing and gates, car parking, lighting, utilities, lightning protection masts, underground services, landscaping and associated

engineering works to provide for the connection of site services and foul and surface water management and drainage.

### **3. Comments from the Local Environmental Health Service**

A visit to the proposed development site was carried out in July 2026, the following observations were made:

- The site is located between Rochfortbridge and Tyrrellspass on predominantly agricultural land either side of the R446.
- Rochfortbridge is the nearest village located approximately 2.5 km North East from the proposed site and has a National School, Secondary school, 3 childcare facilities, GAA Club and there are 6 other food businesses operating in the village.
- Tyrrellspass is located approximately 3.5 km South West of the proposed development and has a National School, Pre-School Facility, a Nursing Home, GAA Club, and 14 food businesses.
- There are 35 occupied dwellings as the nearest noise-sensitive receptors, mainly along the R446 and local roads.
- Mullingar (14 km) and Tullamore (17 km) are the nearest larger settlements.
- There are 2 dwellings located less than 200 meters from the site entrance that may be negatively impacted during the construction phase of the development
- The site lies approximately 500 metres South of the Mongagh River. No significant streams cross the development footprint, although dry field ditches drain towards the Mongagh River. Groundwater beneath the site comprises the Athboy groundwater body.
- One property with private well was identified within a 1 km radius of the proposed development.
- The existing public road in the vicinity of the proposed development, the R466, appears to be in generally good condition. It is a two-lane carriageway with a surface that appears to be well maintained, with no obvious signs of significant deterioration such as potholes, rutting or extensive cracking visible at the time of the site inspection. Road markings are clearly defined and the carriageway provides sufficient width for two-way traffic movement.
- The roadside verge is generally grassed, with mature hedgerows present along sections of the road boundary.
- No evidence of standing water, significant drainage deficiencies or surface defects were observed during the site visit.
- There is no obvious evidence of dust generation, flooding or road surface damage that would adversely affect access to the site.
- The road entrance at the site entrance has been recently resurfaced and is in good condition.

- No complaints regarding previous activities associated with the proposed development have been received by the local Environmental Health Office.

### **Environmental Health Conclusion**

Particular attention should be given to construction phase noise, dust control, protection of surface waters, operational noise from transformers and generators, and management of construction traffic.

Impacts should be appropriately managed throughout the implementation of the mitigation measures outlined in the application documentation. Operational noise from transformers, switchgear and the emergency generator should comply with applicable standards at the nearest noise-sensitive receptors.

### **4. Public Consultation**

Public Consultation could not be found in EIAR. The NEHS notes that planning notices were placed in the Westmeath Topic on the 2<sup>nd</sup> of July 2026 and Irish Daily Star newspapers on the 3<sup>rd</sup> July 2026.

The NEHS recommends that there is engagement with the local community as early as possible and in particular during the construction phase. This may include a focal point person such as a Community Liaison Officer (CLO) where feedback including complaints can be received, including a process for the complaint to be investigated and responded to in a timely manner.

### **5. Water – Chapter 8**

The NEHS has considered Chapter 8 of the EIAR – Water Environment. An assessment of potential risks of the proposed development to surface and ground water were carried out by the applicant, it has been determined that:

- during the five-year build programme, excavations, top-soil stripping and earthworks could generate sediment-laden runoff and expose soils to erosion, while fuels, concrete additives and other construction chemicals pose a spill risk.
- Once operational, the principal risks are potential leaks of oils, altered drainage patterns where hardstanding replaces grassland, and localised reductions in groundwater recharge. Modelling identifies moderate potential effects on groundwater quality and slight to moderate effects on storm-water runoff volumes; one-off incidents such as chemical spills could also occur.
- Water demand will be served by three proposed on-site wells drawing a combined estimate quantity of 40m<sup>3</sup> per day. Water demand is low and remains within a maximum envelope of 40m<sup>3</sup> per day following a Confirmation of Feasibility from Uisce Éireann, up to 10m<sup>3</sup> per day will be drawn from the

public water network, with on-site groundwater abstraction reduced to no more than approximately 30m<sup>3</sup> per day.

- findings from a Stage 3 Flood Risk Assessment (FRA) confirmed the lands are at low risk from fluvial, pluvial or groundwater sources.
- The FRA has determined that the proposed development will not have a negative impact, in terms of flood risk, on the local drainage network, on local private property, or to the surrounding environment and human health.

The assessment was prepared in accordance with EPA 2022 guidance and considers requirements as set out in the Water Framework Directive (WFD).

As part of the Construction Environmental Management Plan (CEMP), the following mitigation measures will be implemented according to the applicant:

- deploy silt fences, sediment traps and check dams.
- stabilise exposed slopes with erosion blankets.
- confine refuelling or paint-mixing to bunded areas equipped with spill kits and trained personnel.
- Regular inspections and an on-site pollution-prevention plan underpin these controls.
- drainage is designed around green-infrastructure principles: landscaped green areas, vegetated swales, will restore natural percolation rates, while roof and yard run-off is directed to lined attenuation ponds appropriately sized to account for climate change.
- All hazardous liquids will be stored in double-contained systems with leak-detection alarms, and the plant layout channels any accidental releases away from groundwater recharge zones.
- fully aligned with the SuDS hierarchy.

## **6. Noise and Vibration – Chapter 11**

The NEHS has considered Chapter 11 of the EIAR – Noise and Vibration. An assessment of potential for noise and vibration impacts from the proposed development was carried out by the applicant, it has been determined that:

- Baseline sound levels were established through unattended monitoring at four locations between 7<sup>th</sup> and 11<sup>th</sup> April 2025.
- The findings of the survey determined that neither daytime nor night-time backgrounds qualify as “*low-background*” under EPA definitions.
- Thirty-five dwellings, scattered mainly along the R446 and local lanes were identified as nearest noise-sensitive receptors.
- no significant sources of ground-borne vibration were recorded during the survey campaign.

**Construction phase:**

- During construction, earth-moving and site-levelling plant could temporarily raise sound levels above the 65 dB LAeq,1 hr threshold at a handful of properties closest to the berm works.

**Operation phase:**

- Predictive modelling of more than 1,400 point sources, including fuel-cell stacks, battery inverters, rooftop dry coolers, air handling units and solar inverters, indicates façade levels of 31–44 dB LAeq at almost all receptors, comfortably beneath the 45 dB(A) night-time limit. Only one house (NSR 6, an associated project landowner) is forecast at 46 dB(A) - direct mitigation for NSR 6 will be agreed with the occupant if required.

**Mitigation:**

- The applicant states that a construction-stage Noise and Vibration Management Plan will appoint a site representative, maintain a complaints log, deploy real-time boundary monitors and, where necessary, install temporary acoustic hoarding or reschedule the noisiest tasks to keep levels within guideline values.
- With the implementation of mitigation measures, the EIAR concludes that construction activities will not produce significant residual noise or vibration impacts, and that operational emissions will meet EPA daytime, evening-time and night-time limits at all NSR's.
- Subject to agreement with the planning authority, it is anticipated that the following times will constitute the standard working hours on the construction site.
  - o Monday to Friday 07:00 to 19:00
  - o Saturdays 07:00 to 13:00
  - o Site closed on Sundays and Bank Holidays

**7. Air Quality – Chapter 9**

The primary source of air quality impacts relevant to the proposed development relate to dust emissions during the construction phase. The NEHS has considered Chapter 9 of the EIAR – Air Quality. An assessment of potential for noise and vibration impacts from the proposed development was carried out by the applicant, it has been determined that:

- The 243-hectare site lies predominantly lies between the M6 and R446, where road traffic is already the dominant influence on air quality. EPA Zone D monitoring stations show low background concentrations—annual means of roughly 7.7µg/m<sup>3</sup> NO<sub>2</sub>, 11.8µg/m<sup>3</sup> PM<sub>10</sub> and 8.1µg/m<sup>3</sup> PM<sub>2.5</sub>

- Construction activities comprising of earthworks, material handling and vehicle movements have the potential to generate coarse dust (30-75µm) within about 100m of active works and raise short-term suspended particulate matter.
- plant and HGV exhausts add small amounts of NO<sub>x</sub>, PM<sub>10</sub>/2.5 and CO.

**Mitigation:**

The applicant states that a site-wide dust management plan will be integral to the Construction Environmental Management Plan (CEMP). Measures include:

- locating stockpiles away from residence.
- hard-surfacing haul routes.
- covering or damping exposed soils in dry or windy weather.
- bunded fuel-storage areas with spill kits.
- daily inspections backed by boundary dust gauges.
- water sprays, speed limits and wheel-washing will minimise track-out onto the public road.
- For operation, the project will incorporate low-NO<sub>x</sub> fuel-cell technology, stack heights chosen by dispersion modelling, impervious chemical stores with leak alarms, and an emergency-generator maintenance schedule that keeps annual run-time minimal.

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

The development itself will bring a level of employment in the construction phase. Should welfare facilities in the temporary construction compound become a commercial 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.

All drinking water and water used for the preparation of food in the temporary construction compound should meet the requirements of S.I. No. 99/2023 - European Union (Drinking Water) Regulations 2023 (as amended).

Where smoking shelter(s) are provided if any within temporary construction compound, 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.

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

The NEHS has considered the CEMP and is of the opinion that there will be adequate protection of public and environmental health during the construction phase provided the following are implemented:

- The mitigation and controls are implemented in full.
- The effectiveness of environmental controls are monitored and reviewed and increased mitigation/corrective action is taken where required, especially when there is an environmental complaint.
- There should be no direct emission to ground or surface water of any foul wastewater.
- Site drainage should ensure the protection of surface and ground water during the construction phase.
- 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.
- A pest/vector management control plan should be developed for protection of nearby sensitive receptors. Construction activities should ensure that drains and sewers are not damaged or left open, in order to prevent rodent access and infestation. This is a crucial point, as there are a number of sensitive receptors near the proposed development.

## **10. Recommendations**

Should permission be granted for the proposed development, the NEHS makes the following recommendations:

- That there is engagement with the local community as early as possible and in particular during the construction phase. This may include a focal point person such as a Community Liaison Officer (CLO) where feedback including complaints can be received, including a process for the complaint to be investigated and responded to in a timely manner.
- Mitigation measures described in the EIAR and CEMP, that are protective of public and environmental health in relation to construction and operational phases, are set as minimum conditions of planning if permission is granted.
- Climate projections indicate that Ireland is expected to experience more frequent heavy rainfall and storm events - the project should incorporate Sustainable Drainage Systems (SuDS), attenuation ponds, swales and rainwater harvesting as much as possible to manage future climate risks.

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

Yours Sincerely,



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Senior Environmental Health Officer,  
Officer  
Environment Network Support Unit



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Principal Environmental Health