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To: [SIDS](#)
Subject: VA16.324429 Cunlaghfadda Green Energy Limited
Date: Friday 21 August 2026 12:17:29
Attachments: [HSE NEHS Submission ACP VA16.324429.pdf](#)

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Please find attached the HSE NEHS submission in relation to this application.

Tim Coffey SEHO
Mayo PEHO office

FSS Seirbhís Náisiúnta Sláinte Comhshaoil, Áras Naomh Mhuire, Sean-bhothair Chathair Na Mairt, Caisleán an Bharraigh, Contae Mhaigh Eo.

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Date: 21st August 2026

Type of consultation: Strategic Infrastructure Development (SID) with an Environmental Impact Assessment Report (EIAR)

Report to: An Coimisiún Pleanála (ACP)
Email: sids@pleanala.ie

Planning Case Reference No.: **ACP VA16.324429**

Our Reference No. EHIS 6140

Applicant: Cunlaghfadda Green Energy Limited

Description of Proposed Development: Proposed Grid Connection of a 110kV onsite electrical substation, loop-in grid connection, and associated infrastructure and works, in the townland of Cloonbaul, County Mayo.

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 17th July 2026:

- Emergency Planning – Paul Brophy/ Sean Adair
- National Capital Estates Office – Regional AND
- Director of National Health Protection – Eamonn O' Moore
- REO West & North West – Tony Canavan

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 regarding 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

Particularly sec 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)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.

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

A decision was made by Mayo County Council on 13 July 2026 to refuse permission for the related wind farm application. This SID application relates to the grid connection works. The earlier local observations remain relevant where they relate to environmental health concerns.

This report only comments on environmental health impacts of the proposed development as outlined in the EIAR and relevant documents and the adequacy of such from an 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

The applicant has submitted an EIAR for the proposed development. The purpose of the development is to connect the proposed Cunlaghfadda Wind Farm to the existing Castlebar to Cloon 110kV overhead electricity line. This planning case is for the grid connection works, not the wind farm itself.

The proposed works include a new 110kV electrical substation, underground electricity cabling, two new end masts, a telecommunications tower, access tracks, site drainage, a temporary construction compound, wastewater holding tanks, rainwater harvesting tanks, fencing, lighting and associated site works. A ten-year planning permission is being sought.

The EIAR, NIS and relevant documents also assess the wider project, including the associated wind farm, but the wind farm is subject to a separate planning application to Mayo County Council.

The site is in a rural area of Co. Mayo. The lands are mainly agricultural, with rough grazing, cutover bog, peat cutting areas and some forestry. Access to the site is from the local road network.



From an environmental health point of view, the main issues are likely to be during construction. These include temporary construction traffic, dust, noise, drainage, protection of surface and groundwater, fuel and oil storage, wastewater from welfare facilities, waste management and access for residents and landowners.

3. Comments from the Local Environmental Health Service

Local Environmental Health input was received in relation to this application.

The nearest dwellings are approximately 400 metres west of the proposed substation. Mayo Abbey National School and Mayo Abbey GAA pitch are approximately 2 km west of the proposed substation. The local office noted that, based on the nature and location of the substation/grid connection works, significant effects on these receptors are unlikely, provided the proposed construction controls are implemented.

The local office is not aware of any private wells in the immediate area. The area is served by the Lough Mask Public Water Supply. No surface waterbodies were identified in the immediate vicinity of the proposed substation.

The surrounding land use is mainly agricultural land, forestry, turf cutting and one-off housing.

The local office also noted that the access roads are typical rural roads, with some two-lane sections, some single-lane sections with passing points, with one road near the site of the proposed substation currently unpaved. This is relevant because construction traffic, road condition, dust, mud and access for residents and landowners will need to be properly managed.

4. Public Health Consultation

The submitted documentation shows that the normal statutory process for a Strategic Infrastructure Development application has been followed. The application is being made directly to An Coimisiún Pleanála under Section 182A of the Planning and Development Act 2000, as amended. The site notice states that the application, EIAR and NIS are available for public inspection.

Pre-application consultation was carried out with Mayo County Council in January 2024 and March 2026. The matters discussed included the proposed grid connection route, site constraints, archaeology, peat stability, ecology, landscape and visual impacts, residential amenity, works to the public road, planning policy and community consultation.

Pre-application consultation also took place with An Coimisiún Pleanála. The documentation states that An Coimisiún Pleanála confirmed that the proposed grid connection is Strategic Infrastructure Development and that the application should be made directly to the Commission.



Community consultation was also carried out. A Community Liaison Officer was appointed, information packs were posted in March 2026 to householders within approximately 2 km of the proposed project, and the information was also made available on the project website. Door-to-door visits were carried out to households within approximately 1 km of the project on 10 March 2026, and a community clinic was held on 8 April 2026 in the McWilliam Park Hotel, Claremorris.

From an environmental health point of view, the main point requiring confirmation is how communication will continue during the construction phase. This is important because the works may temporarily affect residents, landowners, road users and people using local agricultural access routes.

Recommendation

It is recommended that, in the event of a decision to grant, before works start and secured by condition where appropriate, the applicant confirms a clear construction-stage community liaison procedure. This should include:

- a named community or environmental liaison contact for the construction stage;
- advance notice to nearby residents, landowners and other affected parties before works start in their area;
- advance notice of temporary access changes, traffic movements, vegetation removal, noisy works, dusty works or works near drainage features;
- a clear complaints procedure, including how complaints will be recorded, investigated and responded to;
- confirmation that the complaints log will be made available to the planning authority if requested.

This would help ensure that local concerns are dealt with and that the mitigation measures in the EIAR, NIS and CEMP are applied properly in practice.

5. Water – Chapter 9

The NEHS considered Chapter 9 of the EIAR, the Flood Risk Assessment and the Surface Water Management Plan.

The main water issues are protection of surface water, groundwater, drinking water supplies and local drainage during construction. This is particularly relevant because the works include site drainage, access tracks, underground cabling, a substation compound, wastewater holding tanks, fuel and oil storage, tree/vegetation removal and movement of construction traffic.

The documentation states that there are no surface water Drinking Water Protected Areas in the immediate vicinity of the site. The Lough Mask Drinking Water Protected Area is downstream via the River Robe, with a hydrological



flowpath of more than 38 km. The documentation also identifies downstream Uisce Éireann abstractions, including the Cullentra and Rathnacreeva abstractions.

The documentation states that no private wells were identified within the site from the GSI database. However, it also accepts that the GSI database may not include all potential wells, and the assessment takes a conservative approach by assuming a groundwater well source at each sensitive receptor location.

The Surface Water Management Plan sets out two main drainage principles: keeping clean water clean by diverting it away from works areas, and collecting potentially silt-laden runoff for treatment through silt traps, settlement ponds or similar measures before controlled release. It also states that there will be no discharge of untreated or unattenuated water to drains, watercourses or other hydrological features.

The Flood Risk Assessment concludes that the site is in Fluvial Flood Zone C and is at low risk of flooding. It also states that the risk of the proposed project contributing to downstream flooding is very low, provided the proposed drainage measures are implemented, including swales, silt traps, check dams, settlement ponds and buffered outfalls.

The CEMP also includes wastewater controls. Temporary toilets and welfare facilities will be used during construction. Wastewater will be directed to sealed storage tanks and removed from site by permitted waste collectors to wastewater treatment plants. The wastewater storage tank will also have an automated alarm system to give notice when emptying is required.

The water assessment is acceptable from an environmental health perspective. The main point requiring confirmation is how the final drainage, wastewater and pollution control measures will be implemented and checked during construction, especially during heavy rainfall or wet ground conditions.

Recommendation

It is recommended that, in the event of a decision to grant, before works start and secured by condition where appropriate, the applicant confirms:

- that any private wells or drinking water supplies close to the final works area are checked by a site walkover/local check, not just desktop records, before construction starts;
- who will be responsible on site for checking drainage and water protection measures during the works;
- that surface water controls will be checked after heavy rainfall and that works will stop or be adjusted if there is a risk of dirty water leaving the site;
- that the final CEMP clearly shows how wastewater holding tanks will be monitored, emptied and maintained during both construction and operation;



- that any pollution incident, spill, drainage failure or wastewater issue will be recorded, reported and responded to without delay.

6. Noise and Vibration – Chapter 12

The main issues are construction noise and operational noise from the proposed 110kV substation and fixed plant. The wider EIAR also assesses wind farm noise, but this submission focuses on the grid connection and substation works only.

The EIAR states that the proposed substation will operate on a 24-hour basis. As the area has low background noise levels, night-time noise is the most important point. The EIAR uses a night-time criterion of 35 dB LAeq,T for the operation of the substation and states that this should prevent adverse impacts at noise sensitive locations.

Construction works will include the substation, grid connection and underground cabling. The EIAR states that, due to the distance from the nearest noise sensitive locations, significant noise and vibration impacts are not expected. Normal construction hours are stated as weekdays 08:00–20:00 and Saturdays 08:00–13:00, with any works outside these hours to be agreed in advance with the Local Authority. The assessment is acceptable.

Recommendation

It is recommended that, in the event of a decision to grant, before works start and secured by condition where appropriate, the applicant confirms:

- how nearby residents and landowners will be notified in advance of any particularly noisy works or approved out-of-hours works;
- that any out-of-hours works will be agreed in advance with the Local Authority
- that noise or vibration monitoring will be carried out if complaints are received or if works take place closer to sensitive receptors than assessed;
- that operational noise from the substation and fixed plant will meet the noise limits set out in the EIAR at the nearest noise sensitive locations;
- that any noise or vibration complaint will be recorded, investigated and responded to in a timely manner.

Subject to these measures being implemented, no significant environmental health concern is identified in relation to noise and vibration for the proposed development.

7. Air quality – Chapter 10

The EIAR states that baseline air quality sampling was not considered necessary due to the non-industrial nature of the proposed project and the rural character of the surrounding area. It also states that the existing air quality is



expected to be good, as there are no major sources of air pollution, such as heavy industry, in the vicinity of the site.

The main issue is construction dust, especially from excavation, backfilling, construction traffic, haul routes, exposed ground and dry or windy weather. The EIAR also identifies risk of transport of dust and dirt from the site onto public roads with the risk of further spreading on sections of the L1505 and L15053.

The submitted documentation already includes dust control measures, including wetting loose surfaces, dust suppression during dry weather, use of agreed haul routes, covering materials where needed, regular road inspections and road cleaning where necessary.

To avoid repeating the EIAR and CEMP, the we recommend that the following points are confirmed before works start:

- who will be responsible on site for dust checks and road cleanliness checks;
- how often dust and road cleanliness checks will be carried out, especially during dry or windy weather;
- that dust controls will be increased if visible dust, mud on roads or complaints occur;
- that particular attention is given to rural roads, passing points and any unpaved access routes used by construction traffic;
- that any dust complaint will be recorded, investigated and responded to in a timely manner;
- that records of dust inspections, road cleaning and corrective actions will be kept and made available to the planning authority if requested.

This would add value because the documents already include dust mitigation measures, but the final CEMP should clearly show how these measures will be checked, recorded and acted on during the works.

8. Food Safety and Environmental Compliance

The proposed development includes temporary welfare facilities during construction. The CEMP refers to temporary toilets, portacabins, water supply for hygiene purposes and canteen-type waste from construction workers.

If any welfare facility, canteen or food preparation area operates as a food business, registration will be required in accordance with Article 6(2) of Regulation (EC) No. 852/2004 with the HSE Environmental Health Service.



All drinking water and water used for food preparation, if any, should meet the requirements of S.I. No. 99/2023 – European Union (Drinking Water) Regulations 2023, as amended.

Where smoking shelters are provided, they should comply with Section 47 of the Public Health (Tobacco) Act 2004, as amended.

Recommendation

It is recommended that, in the event of a decision to grant, before construction welfare facilities become operational, the applicant or contractor confirms:

- whether any food preparation, storage or service will take place on site;
- that food business registration is completed where required;
- that drinking water used for welfare or food purposes is from a safe and compliant supply;
- that wastewater from welfare facilities will be stored in sealed tanks and removed off site to an appropriate facility;
- that waste from welfare facilities will be stored securely and removed by authorised waste contractors;
- that any smoking shelter, if provided, complies with tobacco control legislation.

9. Construction Environmental Management Plan (CEMP) Appendix 4-5

The CEMP is acceptable. It includes controls for drainage, traffic, dust, noise, invasive species, waste management, emergency response, environmental monitoring and site responsibilities. It also states that the CEMP may be updated as the project progresses, but any future version must meet or exceed the standards set out in the submitted document.

The NEHS recommends that the final CEMP should be a practical site document, bringing together the mitigation measures, monitoring requirements and any planning conditions into one clear document before works begin.

Recommendation

Should permission be granted, it is recommended that the final CEMP is agreed before works start and confirms:

- that all mitigation measures and monitoring requirements relevant to environmental health are included in the final CEMP;
- that the final CEMP clearly identifies the person or role responsible for implementing and checking each measure;
- that the CEMP is updated to include any planning conditions or requirements from An Coimisiún Pleanála, Mayo County Council, Uisce Éireann or any other relevant authority;



- that any changes to construction methods or mitigation measures are recorded and agreed with the relevant authority where required;
- that inspection, monitoring, incident and corrective action records are kept during construction and made available to the planning authority if requested;
- that all waste, wastewater, fuel, oil and chemical management procedures are carried out in accordance with the relevant legislation.

Conclusion:

The NEHS has reviewed the submitted documentation from an environmental health perspective. This submission relates to the proposed 110kV substation, grid connection and associated works at Cloonbaul, Co. Mayo. The associated wind farm is a separate planning application, although the EIAR and NIS also consider the wider project.

The submitted EIAR and supporting documents include mitigation measures for these matters. The NEHS recommendations seek to ensure that these measures are clearly included in the final CEMP, implemented on site and checked during construction.

Subject to the mitigation measures being implemented, and the recommendations in this report being addressed, no significant environmental health concern is identified in relation to the proposed grid connection development.

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

Yours Sincerely,

Marisol Gonzalez Troya

Jennifer Shorten

A handwritten signature in dark ink that reads 'Marisol Gonzalez Troya'.

A handwritten signature in dark ink that reads 'Jennifer Shorten'.

Network Support Unit Member

Principal Environmental Health Office