
EIAR Crumach WF

From Marie Matthews <Marie.Matthews@hse.ie>

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Please see attached report from Sligo Leitrim National Env. health Service

Kind regards

Marie

Marie Matthews

**Príomhoifigeach Sláinte Comhshaoil
Principal Environmental Health Officer.**

**FSS Seirbhís Náisiúnta Sláinte Comhshaoil / Sligeach / Liatroma / Iarthar an Chabháin
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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: 23rd of September 2026

Type of consultation: Strategic Infrastructure Development (SID)
accompanied by Environmental Impact
Assessment Report (EIAR)

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

Planning Case Reference No.: PAX21.324561 / ABP-324561-26

Our Reference No. EHIS 6214

Applicant: MKO on behalf of SSE Renewables Ireland
Limited

Description of Proposed Development: Construction of the Crumhach Wind Farm (CWF)
Development. This consists of the
decommissioning of 23 no. turbines and the
erection of 17 no. wind turbines, underground
electrical (33kV) and communications cabling
connecting the wind turbines to a new on-site
110kV electrical substation and all associated
infrastructure and works on land within the
townlands of Crowagh or Dunneill Mountain,
Ballyglass, Tawnadremira, Doonbeakin, Dunowla,
Kingsmountain, Ballygreighan Barr, Corhawnagh,
Abbeytown, Knockaculleen, Rathgoonaun,
Lecarrow, Dromore, County Sligo.

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 August 2026:

- Emergency Planning
- National Capital Estates Office
- Director of National Health Protection
- Regional Executive Officer West & North West

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 by the NEHS are to inform ACP on any likely significant effect on Public Health and give an opinion on any proposed mitigation. Any observations made are to inform and assist the decision making of ACP in the planning process.

The 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 Impact(s).

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, ACP 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.

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 and service provision and activities within communities and not individual members of communities.



It is recommended that the An Coimisiún Pleanála (ACP) also follows this method when consider Public Health in their decision-making.

The NEHS scoping submission on the 3rd October 2024 (EHIS 4190) is still applicable to this application.

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 and the Non-Technical Summary (NTS)
- Population and Human Health and Shadow Flicker
- Noise and Vibration
- Soils and Geology
- Hydrology & Hydrogeology
- Food Safety and Environmental Compliance
- Construction Environmental Management Plan (CEMP)

The comments below are not exhaustive but serve to capture key points of the proposed development.

2. Assessment of Description of the Project and Physical Environment

The applicant has submitted an EIAR on the proposed development including to remove 23 no. existing turbines and construct a renewable energy development comprising 17 no. turbines and all associated infrastructure in the townlands of Crowagh and Dunneill Mountain, Co. Sligo.

Proposed Development:

The Proposed Development will consist of:

- Removal of 23 no. existing turbines permitted under Sligo County Council Ref. No. 97/469, 02/846, 03/619 (the latter granted on appeal by An Coimisiún Pleanála PL21.204790) and 22/291;
- Erection of 17 no. wind turbines within the following parameters:
 - a turbine tip height range of 176.6 metres to 180 metres;
 - a rotor diameter range of 133.2 metres to 150 metres; and
 - a hub height range of 105 metres to 110 metres.
- Permanent turbine foundations, hard-standing and assembly areas;
- A new permanent 110kV electrical substation compound including control buildings (with a combined floor area of 654sq.m) incorporating welfare facilities, all associated electrical plant and apparatus, security fencing, underground cabling, lightning protection poles, an underground wastewater holding tank, drainage and all ancillary works;



- Upgrade of and permanent continued use of 2 no. existing onsite control buildings comprising: 1 no. control building located in the townland of Tawnadremira (with a floor area of c. 118.4sqm), permitted under Sligo County Council Planning References 03/619 (granted on appeal by An Coimisiún Pleanála PL21.204790), 10/371, and 22/291; and 1 no. control building located in the townland of Kingsmountain (with a floor area of c.71sqm), permitted under Sligo County Council Planning References 97/469 and 03/382.
- Underground electrical and communications cabling connecting the proposed wind turbines to the existing onsite control buildings and the proposed 110kV on-site electrical substation;
- 4 no. temporary construction compounds with site offices and welfare facilities (with a combined floor area of 324 sqm);
- Upgrade of 1 no. existing site entrance off the L6309 in the townlands of Ballyglass and Crowagh or Dunneill Mountain;
- 1 no. new site entrance off the L6309 in the townlands of Ballyglass and Crowagh or Dunneill Mountain;
- Upgrade of 1 no. existing site entrance off the L2702 in the townland of Crowagh or Dunneill Mountain;
- 2 no. new site entrances off the L2702 in the townland of Crowagh or Dunneill Mountain;
- Upgrade of existing site tracks and provision of new site access tracks, clear span crossings, junctions and hard-standing areas;
- Accommodation works along the N59 in the townlands of Corhawnagh and Abbeytown, along the R297 in the townland of Knockaculleen, along the L2702 in the townland of Lecarrow and Dromore, along the L2702 in the townland of Rathgoonaun and along the L2702 and L6309 in the townland of Crowagh or Dunneill Mountain, to facilitate the delivery of turbine components and other abnormal sized loads to site;
- A new temporary access road off the L2702 to the L6309 in the townlands of Crowagh or Dunneill Mountain;
- 3 no. temporary borrow pits;
- 2 permanent LiDAR compounds;
- Peat and Spoil Management areas;
- Tree felling and hedgerow removal;
- Biodiversity Management and Enhancement measures (inclusive of peatland restoration and management);
- Site Drainage;
- Operational stage site signage; and
- All ancillary apparatus and site development works above and below ground, including soft and hard landscaping and drainage infrastructure.

A 10-year planning permission and 35-year operational life from the date of commissioning of the entire Wind farm except for the construction of a new



underground cable connection to the existing Srananagh 220kV substation is being sought. There are two Grid Connection Routes (GCR) the existing GCR and a new Proposed GCR. This will include an onsite 110kV substation, which will connect to the national grid connection at existing Srananagh 220kV substation in the townland of Ballysumaghan, Co. Sligo. These are assessed as part of EIAR, but is not the subject of this planning application. According to NTS, this will be the subject of a later application.

NEHS recommends that the new GCR and onsite substation be part of the planning application as per O’Grianna V An Board Pleanála (IEHC 632, 12/12/2024) case law i.e. ‘The wind turbine development on its own serves no function if it cannot be connected to the national grid.’ This case law is referenced in “Guidelines on the information to be contained in Environmental Impact Assessment Reports” by EPA (2022).

The Proposed Development is situated on existing renewable energy infrastructure i.e. Dunneill (13 no. turbines) and Kingsmountain (10 no. turbines) Wind Farm developments, commercial forestry, peat/turf cutting, pastoral agricultural land, and low density residential areas. The CWF boundary covers an area of approximately 1,546 ha with a permanent footprint of 27.6ha. It is located on mountainous land near slopes steeply up towards the summit of the Ox Mountains, with a ground elevation of between 110 and 390m OD. CWF will be accessed via the existing site entrance from the L6309 Local Road, previously used for the Existing Wind Farm. It will utilise 1 no. existing access/egress location along the L2702 Local Road, construct 2 no. new access/egress locations along the L2702 Local Road and 1 no. new access/egress location along the L6309 Local Road. Chapter 5 of the EIAR states that there are 18 no. properties located within 1km of the Proposed Turbines, of which 4 no. are derelict properties and 1 no. is a water treatment plant. The closest property is located approximately 728m from the nearest proposed turbine (T10). This is in line with the Draft Revised Wind Energy Development Guidelines (WEDG 2019) minimum set back of 500m and 4 x tip height setback i.e. 720m.

There are 1,379 no. properties located within c.250m of the Proposed GCR. The GCR is 41.1 Km long and mostly follows the National and local road networks, which include a minimum of 21 no. EPA water crossings to construct.

The construction of the whole development is estimated to take approximately 18-24 months to complete.

A full description of the Proposed Development is provided in Non-Technical Summary (NTS) and Chapter 4 in more detail.



3. Comments from the Local Environmental Health Service

The Local Environmental Health Sligo office was contacted; in relation to this application. Ms Priscilla Beirne, Environmental Health Officer (EHO), who provided the following observations and carried out a site visit on the 9th of September 2026.

The proximity of the site to sensitive receptors and Condition of access roads around the development site

- A number of isolated houses and farms were noted at the base of both approaches (L2702 and L6309 and a derelict house is located closer to the proposed development.
- Dromore West Central National School and Daisy Lane early learning childhood service is located approximately 5.5kms from the proposed development just off L2702. A farm supply shop was also noted near the national school (L2702).
- Numerous food businesses, sports grounds, a veterinary practice, a beauty salon and a sizeable resident population are in the nearby town of Dromore West, approximately 7.5kms.
- St Farnan's GAA Club and Saint Joseph's National School are in Templeboy approximately 6kms from the proposed development.

Location of private wells and proximity to watercourses, including streams, rivers or lakes

- The proposed development is intersected by the Dunneill River and is located approximately 3kms away from Lough Nafullow lake.
- Lough Easkey Water Treatment plant is located 1.5kms away from the proposed site – this treatment plant serves a population of 6052. The raw water for this supply is abstracted from Lough Easkey (7kms from the proposed site).

Any other industries in the locality

- The only other commercial use of the surrounding land was for sheep grazing.



Any local concerns regarding the proposed development

- To the best of knowledge, the NEHS Sligo Leitrim West Cavan has not received any complaints regarding this development.

Condition of access roads around the development site

- There were several Western Forestry Co-op managed lands in the area consisting of coniferous plantations, consequently the access roads L2702 and L6309 leading to these areas were in relatively good condition. However, the condition and width of the roads deteriorate and narrow towards the proposed development. Warning signs were noted about the condition of the road surface on L2702.

4. Assessment of Public Consultation and Non-Technical Summary (NTS)

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

The EIAR does demonstrate the link between public consultations and details how they have influenced the decision-making process in the EIA for this CWF in Co. Sligo. This was outlined in Chapter 2, Appendix 2-1 Scoping Responses and Appendix 2-2 Community Engagement Report. The scoping consultation stage commences in September and October 2024.

NEHS notes that this CWF has a dedicated Community Liaison Officer (CLO) since March 2024 along with an address, generic email and dedicated website. The applicant has presence in West Sligo since 2004 through the Dunneill and Kingsmountain Wind Farms. The Public were informed of this Project through three phases. This involved regular issuing of letters and newsletters, two public consultation events held on the 23rd and 24th of July 2025, a virtual consultation room and a series of meetings with local and regional stakeholders. An example of how feedback from the project team and the local community was included in the final design was highlighted in Chapter 3 of EIAR i.e. to refine the number of turbines from no. 25 to no. 17. 9.0 ha development footprint of the Existing Wind Farm. NEHS notes that out of the no. turbines 8 were removed from design due to areas of the forestry block that contained deep peat, that was highly waterlogged and on steep slopes.

NEHS notes from Chapter 4 that a community benefit fund will be established under the RESS programme. It is NEHS perspective that this should not reduce the Public Health protection measures for all those living near this proposed development.



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.

5. Assessment of Population Health and Human Health and Shadow Flicker

The NEHS has considered chapter 5 of the EIAR which assesses the impacts of the Proposed Development on population and human health including Shadow Flicker during the phases of Construction, Operations and Decommissioning. The most relevant aspects highlighted draws upon findings of other chapters notable:

- **Chapter 8:** Land, Soils and Geology;
- **Chapter 9:** Water (Hydrology and Hydrogeology);
- **Chapter 10:** Air Quality;
- **Chapter 11:** Climate
- **Chapter 12:** Noise and Vibration and
- **Chapter 16:** Major Accidents.

Consideration of Population and Human Health should be done in a proportionate manner that is specific to the proposed development and any likely significant effects the proposal might have on Population Health.

Particularly:

- Any likely significant effect 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, particularly dust and emissions,
- Protection of ground and surface water during construction activities from contamination with hydrocarbon spillages or sedimentary run off.

It is the opinion of the NEHS that the EIA has identified these areas for assessment, and they are reported in the EIAR.



The NEHS recommends An Coimisiún Pleanála (ACP) consider Chapter 5 in the context of our previous recommendations in this submission, i.e. emissions into the environment and exposure of populations to the emissions and an evaluation against recognised health protection standards.

NEHS notes from section 5.2.3.5 that there are 40 no. properties identified within 1.5km of the Proposed Turbines and 5 no. are derelict properties. The Shadow Flicker Assessment has three different scenarios and is detailed in Appendix 5-2:

- Scenario 1: Tip Height (180m), Hub Height (105m), Rotor Diameter (150m)
- Scenario 2: Tip Height (179.5m), Hub Height (105m), Rotor Diameter (149m)
- Scenario 3: Tip Height (176.6m), Hub Height (110m), Rotor Diameter (133.2m)

According to Appendix 5-2 scenario 3 has one property requiring mitigation measures for shadow flicker as it is over the annual measure of 30 hours per annum. Table 5-11 lists 17 properties that require daily mitigation measures as it is above the 30 minutes per day. NEHS notes in section 5.10.3.2.7 on mitigation measures that the applicant has flexibility in implementing draft Revised Wind Energy Development Guidelines (WEDG) 2019 Guidelines. The draft WEDG 2019 Guidelines is still available on the Department's website as of the date of this submission and should be implemented.

The draft 2019 Guidelines proposed a planning condition of:

The adopted DoEHLG 2006 Guidelines are currently under review. The Draft DoEHLG 2019 Guidelines recommend local planning authorities and/or An Bord Pleanála impose conditions to ensure that:

"no existing dwelling or other affected property will experience shadow flicker as a result of the wind energy development subject of the planning application and the wind energy development shall be installed and operated in accordance with the shadow flicker study submitted to accompany the planning application, including any mitigation measures required."

The Draft DoEHLG 2019 Guidelines are based on the recommendations set out in the 'Proposed Revisions to Wind Energy Development Guidelines 2006 – Targeted Review' (December 2013) and the 'Review of the Wind Energy Development Guidelines 2006 – Preferred Draft Approach' (June 2017).

In the interest of the protection of Public Health, the condition in the Draft 2019 WEDG Guidelines should be implemented if consent is given for the development. Technology has advanced since the publication of the 2006 Guidance and it is a reasonable health protection measure to be included in any conditioning of a wind farm development. The mitigation measures that will eliminate exposure to shadow flicker are technologically robust and established. This mitigation measure should be implemented irrespective of whether the current guidance is updated.



Cumulative Shadow Flicker was also considered as the nearest wind farm is the existing Black Lough Wind Farm (BLWF) and is located approximately 4.2km southwest of the CWF. It concluded that there was no cumulative effect as the shadow flicker study area for the existing BLWF is 920m and there was no overlap.

6. Assessment of Noise and Vibration

Project Specific Guidance for Wind Energy Development

The current Guidelines for Wind Energy Development (GWED) are: Wind Energy Development Guidelines (2006)
<https://www.gov.ie/en/publication/f449e-wind-energy-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.

A revision of the 2006 GWED commenced in 2013 and Draft Revised Wind Energy Development Guidelines (WEDG) were issued in December 2019.
<https://www.gov.ie/en/publication/9d0f66-draft-revised-wind-energy-development-guidelines-december-2019/> These are yet to be adopted; however they are on the Department's website.

The draft 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 would consider the most appropriate criteria for assessing significance of the predicted noise would be 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 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 Draft 2019 (WEDG) Guidelines 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 depends 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 ACP 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://docs.wind-watch.org/IRE-2024_IEHC_136.pdf

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

NEHS notes the most recent development in the Case below.

Nagle View Turbine Aware Group v An Bord Pleanála, and Coom Green Energy Park Limited (2024 IEHC 603) 1st November 2024. The Office of Planning Regulator key takeaways on page 20 included the below screen shot:

- In the context of Section 28 guidelines, it is in principle lawful to have regard to draft guidelines as part of the evolving scientific context or in "*illuminating what amounts to best practice*", particularly where the extant guidelines are potentially viewed as outdated.

https://publications.opr.ie/storage/publications/HKpLQPHtDmvgiveTUlpHqYeoNVmt99rqGKgEAI2J.pdf?_gl=1*1uukl22*_ga*MjA0MTE1MDM0Ny4xNzcwNzl1OTAx*_ga_J58VT3XFH2*czE3NzA3MjU5MDAkbzEkZzEkdDE3NzA3MjYxMDgkaJQzJGwwJGgw

The noise and vibration impacts of CWF, substation, LiDAR and Grid Connection route during construction, operation and decommissioning phases are addressed in Chapter 12 of the EIAR. Whilst sections 12.2 of the EIAR does not accept the above position of the NEHS; the use of the 2006 Guidance



with regards to noise exposure, and in particular the '*balance between development and protection of public health*' stated in ETSU R-97 are resulting in a significant volume of complaints from communities exposed to noise from wind turbines post development. This position that the absolute noise exposure limits set in the 2006 Guidance do not necessarily protect Public Health in specific development situations is now supported by Judgements of the Irish Courts, as reference previously in this submission.

NEHS notes the current noise baseline in section 12.5.1. CWF is located in a remote location, a desktop and field survey was completed with eight Noise Monitoring Locations between June and September 2024 which is <30dB at low wind speeds. The predominant existing noise sources is from the two operational Dunneill and Kingsmountain Wind Farms. Eight Construction Noise Assessment Locations were utilised to predict and assess what will happen due to construction which is predicted to be below 65dB (A) for 21 months.

The Draft 2019 (WEDG) Guidelines propose a noise limit, referred to as a Relative Rated Noise Limit (RRNL) in the range of 35 – 43 dB(A), while not exceeding the background noise level by more than 5dB(A) with an upper limit of 43 dB(A). These limits are recommended by NEHS in the interest of protecting Public Health, particularly to prevent sleep disturbance.

The GCR noise level is likely between 75 – 80 dB (A) and will traverse the following principal townlands: Crowagh or Dunneill Mountain, Ballyglass, Corhawnagh, Abbeytown, Knockaculleen, Lecarrow, Dromore, Rathgoonaun, and Ballysumaghan. The GCR primarily follows existing public road corridors, including the L6309, N59, R290, R284, L6234, and L5204, with minor sections within the wind farm site and at the Srananagh substation. The mitigation measures proposed by Applicant includes a threshold of 20 m from a dwelling as per BC 5228 and erection of temporary boarding as "acoustic blanket panels" will be installed as close to the drilling rig. In relation to the 110kV onsite substation nearest receptor is NSR15, which is approximately 360 m and the noise level is estimated to be 31 dB.

Construction activities may result in temporary increases in noise levels, vibration, and amenity disturbance. The combined effects of construction traffic, narrow rural roads and nearby activities from other projects may increase the perceived noise environment for some receptors.

The NEHS recommends that, if permission is granted, the following measures are secured along with the mitigation measures in section 12.7:

- a) Implementation of a construction noise management and curtailment strategy.
- b) Construction hours restricted to:



- **Monday–Friday: 07:00–19:00**
- **Saturday: 08:00–13:00**
- **Sundays/Public Holidays: No noisy works permitted.**

- c) Noise and vibration monitoring at sensitive receptor locations.
- d) Restrictions on working hours near Easky Lough Treatment plant, schools and community facilities where feasible.
- e) Consideration of cumulative noise impacts, including nearby wind farm operations.
- f) Maintenance of safe access to residential and community receptors.
- g) Implementation of a complaints management procedure with a dedicated CLO from CWF and Grid Connection.

These measures would assist in protecting residential amenity and community wellbeing during construction.

7. Soils and Geology

The NEHS has considered chapter 8 of the EIAR. CWF site is mainly mountainous with a ground elevation of between 110 and 390m OD. The land-cover primarily comprises peat bog, with coniferous forest, wood scrub while land-use in the northern end comprises largely of pastoral agriculture and low-density residential. Geotechnical Ground Investigation (Appendices 4-2 and 8-1) was carried out across CWF which found peat thicknesses of between 0 and 7.2 metres with an average depth of 1.15 m. Section 8.3.9 summarises the Geotechnical and Peat Stability Risk Assessment which determined that the Factor of Safety of 1.3 was adopted into the design for CWF. The EIAR states that this is an acceptable margin and that the risk of peat failure is low.

Lessons learnt from previous landslides at Shass Mountain 2020, Co. Leitrim, Meenbog 2020, Co. Donegal and Derrybrien (2004) were included in this EIAR along with appropriate control measures, such as implementing and maintaining an appropriate drainage system.

The Proposed Grid connection route (GCR) land-use comprises of public road corridor, pastures, low density residential, industry, commercial forestry and land principally used for agriculture. NEHS notes that the Grid Connection route is not expected to interact with underlying bedrock due to shallow nature cable trenching.

The main concerns from Public Health perspective is landslides, soil and ground contamination during rock extraction e.g. contaminated by tar, hydrocarbons, accumulation of spills of fuels, lubricants on plant/vehicles and oil used to cool the transformer(s) in the substation and in each turbine.



NEHS has considered the mitigation measures for Construction, Operational and Decommissioning phases in section 8.7.2 – 8.7.9 of Chapter 8 and CEMP of the EIAR. **NEHS recommends if consent is given for this development the mitigation measures described above and in more detail in Chapter 8 on Soils and Geology, the Peat and Spoil Management Plan (Appendix 4-2) and CEMP are adopted for construction, operations and decommission phases should be included as a condition of consent.**

NEHS recommends that a geologist engineer and Ecological Clerk of Works (ECoW) are employed to maintain a detailed log of the actual volumes of peat excavated and reused i.e. Geotechnical Risk Register and to undertake additional Ground Investigation to confirm assumptions made in analysis in EIAR.

8. Hydrology & Hydrogeology

The NEHS has considered chapter 9 of the EIAR which sets out to assess the potential impacts of the development on the water environment (surface and groundwater). MWF is located within 2 no. sub catchments; Easky_SC_010 and the Dunmoran_SC_010. Table 9-8 provides a summary of both regional and local hydrology at the CWF and grid connection.

NEHS notes from figure 9-5 that there is no historical flooding, however the nearest recurring event is along the Easky River (flood ID: 4446) at Bellafarney Gleneasky townland, approximately 4.1km to the northwest of the CWF. The EIAR states that several recurring flood events mapped along the N59 which overlaps with the Proposed Grid Connection Route. A Flood Risk Assessment (Appendix 9-1) was undertaken and concluded all infrastructure of CWF including the underground grid connection route is located in Flood Zone C i.e. where the probability of flooding is low and a Justification Test is not required.

NEHS notes from section 9.5 to 9.5.7.7 of the EIAR details mitigation by Avoidance, Design and Prevention such as 50m and 100m buffer zones for watercourses and mobile “Siltbusters” along with Monitoring Mitigation Measures for each phase of the development. While no direct human health impacts are anticipated, there is potential for indirect effects during construction through sediment runoff, spills, or disturbance of drainage pathways.

The NEHS recommends strict adherence to the CEMP and mitigation measures in section 9.5 to 9.6 of Chapter 9, with particular emphasis on:

- **Surface water protection,**
- **Spill prevention and,**
- **Management of excavated material.**



9. 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. 852/2004, and that early engagement with the appropriate registering authority be undertaken to ensure compliance with food hygiene legislation.

Where smoking shelter(s) are provided if any within temporary construction compounds, they shall comply with Section 47 of the Public Health (Tobacco) Act 2004 (as amended). NEHS recommends that early engagement with the appropriate registering authority is undertaken to ensure compliance with Tobacco legislation.

10. 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 providing the following items are adhered to:

- 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.
- All drinking water and water used for the preparation of food in the temporary construction compounds should meet the requirements of S.I. No. 99/2023 - European Union (Drinking Water) Regulations 2023 (as amended).
- There should be no direct emission to ground or surface water of any foul waste water. All waste water should be contained and taken off site to a licensed treatment facility.
- Site drainage should ensure the protection of surface and ground water during the construction phase.
- 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 into a specific pest/vector management programme 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.
- That the Traffic Management Plan in (Technical Appendix 15-2) is implemented in full and in consultation with the Local Authority.

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,

Marie Matthews

Príomhoifigeach Sláinte Comhshaoil
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