Lauren Murphy

From: Marie Matthews <Marie.Matthews@hse.ie>
Sent: Wednesday 30 September 2026 14:29
To: SIDS
Cc: EnvCcnsu
Subject: FW: SID Application with an EIAR for a proposed grid connection route and substation at the Lissinagroagh Wind Farm, Lissinagroagh, Co. Leitrim
Attachments: Submission Report for Lissinagroagh Grid Connection SID EH 6241.pdf

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Categories: Lauren

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Please see attached a submission from the National Environmental Health Service Sligo/ Leitrim/ West Cavan in relation to the to proposed GCR and substation at Lissinagroagh Wind Farm, EH 6241.

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.

071 932 1356

From: Environmental Health <environmental.health@hse.ie>
Sent: Thursday 27 August 2026 13:03
To: Paul Brophy <PaulF.Brophy@hse.ie>; Sean Adair <sean.adair@hse.ie>; Emergency Managementwest (Block A,MPH) <Emergency.ManagementWest@hse.ie>; ND CapitalEstates <ND.CapitalEstates@hse.ie>; Director National Health Protection(Éamonn O'Moore) <dnhp@hpsc.ie>; Aideen McLoughlin <aideen.mcloughlin@hpsc.ie>; REO - West North West <REO.WestNorthWest@hse.ie>
Cc: Marie Matthews <Marie.Matthews@hse.ie>; Sligo Peho <Sligo.peho@hse.ie>; environmentnehs <environmentnehs@hse.ie>
Subject: SID Application with an EIAR for a proposed grid connection route and substation at the Lissinagroagh Wind Farm, Lissinagroagh, Co. Leitrim

To

- 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

The HSE has received a Strategic Infrastructure Development (SID) Application with an EIAR for consideration (see attached). The EHIS Reference Number is 6241.

Please email Marie Matthews, PEHO, Sligo/Leitrim (marie.matthews@hse.ie) if you wish to make a submission.

Submissions must reach the local PEHO office no later than the 9th October 2026.

Regards
Avril

An tAonad Seirbhísi Gnó Náisiúnta | FSS Seirbhís Náisiúnta Sláinte Comhshaoil,
Urlár 2 | Teach Darach | Páirc na Mílaoise | An Nás | Co Chill Dara | W91 KDC2
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Má fuair tú an ríomhphost seo trí dhearmad, bheadh muid buíoch dá gcuirfeá in iúil don Deasc Seirbhísí ECT ar an nguthán ag +353 818 300300 nó ar an ríomhphost chuig service.desk@hse.ie agus ansin glan an ríomhphost seo ded' chóras."

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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:	29th September 2026
Type of consultation:	Strategic Infrastructure Development (SID) accompanied by Environmental Impact Assessment Report (EIAR)
Planning Case Reference No.:	324597
Our Reference No.	EHIS: 6241
Report to:	An Coimisiún Pleanála
Applicant:	Tobin on behalf of FuturEnergy Lissinagroagh DAC

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 27th of August 2026:

1. Emergency Planning
2. National Capital Estates Office – Regional AND
3. Director of National Health Protection
4. REO West and North West

Introduction:

The HSE is a statutory consultee under Article 28 of the Planning and Development Act 2000 (as amended) in relation to planning applications accompanied by an EIAR. The National Environmental Health Service (NEHS) considers likely significant effects on Population and Human Health using a source–pathway–receptor approach, with reference to emissions, environmental exposure pathways and recognised health protection criteria.

The assessment adopts a Population Health approach, considering the sensitivity of established land uses and community services, including schools, healthcare facilities and residential areas, rather than individual susceptibilities.

This submission is based on a review of the application documentation and accompanying EIAR. All proposed mitigation measures and commitments have been taken as read.

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 Directives[48]. In keeping with the requirement of the amended Directive, an EIAR should take account of the results of such assessments without duplicating them.

It is recommended that the Planning Authority also follows this method when considering Public Health in their decision making.

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

Description of the Project and Physical Environment:

This Environmental Impact Assessment Report (EIAR) for this development accompanies two planning applications to An Coimisiún Pleanála (ACP) for the proposed project. The first application is for the proposed wind farm under Section 37E of the Planning and Development Act 2000, as amended. The second application is for an on-site 110 kV substation and 110kV underground grid connection, as it comprises development for the purposes of electricity transmission, under Section 182A of the Planning and Development Act 2000, as amended. This submission report refers to the substation and grid connection application only. A previous submission was made to ACP by the NEHS regarding the wind farm application (Ref. ACP-324290-26).

The applicant has given a timeline of 9 months for electrical grid connection/substation installation and commissioning and advises that this may overlap with other works taking place during the 24-month construction phase. According to the timeline in Appendix 2-4 this work is scheduled from January to September 2029.

The proposed GCR is located within the public road corridor extending a distance of approximately 32 km along the following roads: the L61801, R282, R280, L2136, L21361, N16, L2169, L4166, L4165, R289, L8269, L8260, L4260, L82561, L4263, L4262, L42621 in Co. Leitrim and the L12011, L1201, L5204, L52043 in Co. Sligo. The cable will connect to the existing Srananagh substation in Ballysumaghan, County Sligo. Approximately 30.6 km of the GCR will be installed in the public road network. The remaining 1.4km will extend offroad at locations where bridge crossings are not feasible.

A 110 kV underground cable from the on-site 110kV substation will connect to the existing ESB Network at Srananagh Substation in the townland of Ballysumaghan, Co. Sligo. Details are as follows:

- Approximately 32 km in length, of which 30.6 km will be in the public road corridor and is within the width of existing roads
- Eleven (11) existing bridge crossings, of which eight (8) will involve in-road HDD (Horizontal Directional Drill), two (2) will involve off-road HDD and one (1) will be a standard crossing within the bridge deck
- Eight (8) existing culvert crossings by open trenching
- A single grid connection will be constructed for the proposed project and will become a permanent component of the Irish national grid network

Data was reviewed in relation to gas networks infrastructure, including information obtained from the Gas Networks Ireland (GNI) 'dial before you dig service.' No gas network infrastructure was identified along the GCR.

No significant effect related to utilities is anticipated during the construction phase. Should any existing underground services be encountered during construction, particularly along the proposed GCR, or at the locations of the proposed TDR accommodation areas, standard measures / practices in relation to underground services will be undertaken to reduce any potential residual effects

Site Visit:

A site visit along the proposed grid connection route was carried out in mid-September 2026 by a local Environmental Health Officer. It was noted that beyond the immediate towns and villages, the landscape is predominantly rural and pastoral, characterized by the region's typical drumlin terrain and interspersed with several prominent Coillte forestry plantations. The following towns are located along the GCR: Manorhamilton, the second largest town in Leitrim, Dromahair, Ballintogher and Sooey. In addition to these population centres, low-density ribbon developments of detached, single-family houses were noted along most of the proposed GCR travelled. Multiple National schools and Coola Post Primary School together with healthcare and food premises, Churches and Gaelic football club facilities associated with these populations were noted in/around the towns and villages.

The local 'L' roads followed by the proposed GCR feature a narrow profile, though most sections travelled remain in good condition. The necessary planning notices were also noted in good order at multiple points along the route.

The Officer acknowledges that Chapter 8 (Hydrology and Hydrogeology) of the Environmental Impact Assessment Report (EIAR) identifies sensitive watercourses such as the Carrigeencor lake and downstream receiving waters, including the Bonet and Lattone Rivers.

The local Environmental Health Office does not have any complaints on file regarding the proposed development and is not aware of susceptibility to adverse weather in the area.

Public Consultation:

The EIAR demonstrates that public or community consultation, that commenced in April 2021, has informed the project design process, as outlined in Chapter 1 and associated appendices.

The Applicant advised of engagement with the local community during the early stages of the proposed project design, April 2021. This had the objective of ensuring that the views and concerns of all members of the local community were considered as part of the project design and the Environmental Impact Assessment process. This engagement continued throughout the design development stage and has ultimately informed the design of the proposed project. Two Community Liaison Officers (CLO) were appointed during this process to provide consistent and on-the-ground engagement with the local community.

A dedicated website has been developed with all EIAR documents associated with the grid connection uploaded and available for public viewing https://lissinagroaghgridplanning.ie/

All newsletters, brochure, updates and other information are on the project website: www.lissinagroaghwindfarm.ie. The abovementioned CLO is contactable by email and phone and these details will remain on the project website, which will be in place for the duration of the project. As the Lissinagroagh Wind Farm progresses, regular updates will be posted to this website.

The applicant states that all feedback and queries raised by residents are logged and replied to. Queries have been submitted via conversations, phone calls, texts or emails. When a response required technical input, the CLOs acknowledged receipt and ensured that the question was addressed by the project team or the relevant specialist.

Feedback received during consultation has been considered in the development of the final design. A Community Engagement Report has been prepared by the Applicant and is included as EIAR Appendix 1-5.

Population and Human Health:

The NEHS has reviewed Chapter 4 of the EIAR in relation to Population and Human Health.

Population and human health considerations are addressed appropriately through the source–pathway–receptor approach, focusing on potential environmental emissions during construction of the grid connection, including noise, dust, traffic, and water quality risks.

The EIAR identifies key potential pathways of relevance to public health, including:

- exposure to construction noise and vibration,
- dust emissions during excavation and trenching,
- potential contamination of surface water and groundwater,
- and traffic-related impacts affecting community access.

The assessment appropriately recognises nearby sensitive receptors including residential properties, schools, community facilities, and local businesses along the grid connection corridor.

The NEHS is of the opinion that these aspects have been identified and assessed within the EIAR and are consistent with standard environmental health considerations for this type of infrastructure project.

Noise and Vibration:

The grid connection route passes through a predominantly rural area containing a range of sensitive receptors including residential dwellings, schools, community facilities, sports amenities, private businesses.

Noise from the substation and grid connection element of the development will predominantly be caused by:

- Construction of on-site substation;
- Construction of cabling and grid connection including horizontal directional drilling;

The applicant states that associated construction works will occur for short durations at varying distances from noise sensitive locations (NSLs). The nearest NSLs are located at approximately 10 m from the nearest point. In addition to the main construction works involving the laying of cables in subsurface trenches, the proposed GCR requires undercrossing watercourses for which Horizontal Directional Drilling (HDD). There are joint bay pits proposed at every 650m – 850m along the GCR to facilitate jointing of two lengths of cabling. It is expected that excavations for these pits will require an element of rock breaking.

According to the applicant, the predicted noise levels are expected to occur for less than two days in a worst-case scenario, with works anticipated to progress at a rate of 100 metres per day along the route. Where required, it is anticipated that rock breaking will occur at each location for less than 5 days.

A fixed noise limit is proposed in the EIAR for elements of the construction that are linear and progressive in nature, this includes:

- Grid Connection Route (GCR)

- Internal underground cabling

This approach, according to the applicant, is considered appropriate because noise from these activities is variable, typically short in duration, and only at its highest when closest to the NSL. As the works progress, the distance between the construction activities and the NSL increases, resulting in reduced noise levels and shorter periods of potential noise impact.

To set an appropriate fixed noise limit, the applicant makes reference is made to paragraph E.2 BS 5228-1: General Principle: 'Noise from construction and demolition sites should not exceed the level at which conversation in the nearest building would be difficult with the windows shut.'

The applicant goes on to state that, recommended daytime limits (07.00 and 19.00 hours): '...outside the nearest window of the occupied room closest to the site boundary should not exceed: - 70 decibels (dBA) in rural, suburban areas away from main road traffic and industrial noise; - 75 decibels (dBA) in urban areas near main roads in heavy industrial areas'

The applicant advised that if work is necessary on Sundays or Public Holidays, it can only be carried out with the approval of the planning authority.

The NEHS considers that Chapter 9 (Noise and Vibration) appropriately identifies potential temporary impacts associated with construction activities. However, given the proximity of multiple sensitive receptors as identified during the site visit:

- Multiple National schools
- Coola Post Primary School
- Healthcare
- food premises,
- Churches
- Gaelic football club facilities associated with these populations

Further consideration is warranted in relation to cumulative impacts and receptor sensitivity associated with nearby populations.

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

The NEHS recommends that, if permission is granted, the following measures are secured:

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 schools and community facilities where feasible.
e) Consideration of cumulative noise impacts
f) Maintenance of safe access to residential and community receptors.
g) Ongoing communication to sensitive receptors in advance of works in a specific that may have a negative impact
h) Implementation of a complaints management procedure.

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

Air Quality (Dust):

Chapter 11 of the EIAR outlines standard dust mitigation measures including water suppression, covering of materials, wheel washing, speed controls and good site housekeeping.

The applicant advises that there are more than 100 highly sensitive residential properties within 20 m of the grid connection route. The applicant refers to the Institute of Air Quality Management criteria, to determine that the worst-case sensitivity of the area to dust-related human health effects is medium. Best practice dust mitigation measures associated with high-risk works will be implemented to ensure there are no significant impacts at nearby sensitive receptors.

Mitigation measures incorporated into the overall Construction Environmental Management Plan (CEMP - Appendix 2-4 of the EIAR) prepared for the site include:

- Communication
- Appointment of an Environmental Manager
- Keeping of a complaints register
- Cutting, grinding or sawing equipment will be fitted with or used in conjunction with suitable dust suppression techniques such as water sprays
- A Construction Traffic Management Plan (CTMP) has been developed as part of the CEMP to minimise use of the Local Road Network
- Materials with the potential to produce dust, such as excavated material, will be removed from the construction works area as soon as possible
- Ongoing monitoring

The NEHS recommends that all mitigation measures are included as a condition of planning approval, should approval for this development be granted.

While sensitive receptors are acknowledged in general terms, including residential dwellings, schools, community facilities, and recreational areas, the assessment does not provide a receptor-specific dust management or monitoring plan for locations along the grid connection route.

From an NEHS perspective, the absence of a targeted dust control and monitoring strategy for nearby sensitive receptors represents a gap in ensuring adequate protection during construction.

The NEHS recommends a receptor-focused dust management plan be implemented, including monitoring and mitigation measures at schools, residential clusters and sensitive community facilities along the grid connection route.

Land, Soils and Geology:

Chapter 7 of the EIAR addresses geological conditions, soils, and peat stability. The site is primarily comprised of agricultural lands and forestry and is predominantly flat. The majority of the northern portion of the site is mapped as blanket peat, with the southern section of the site dominated by till derived from sandstone and shales.

The applicant states that a Peat Stability Risk Assessment (PSRA) and a Karst Study were undertaken and are referred to in EIAR Appendix 7-1 and 7-2, respectively. Overall peat instability risk is assessed as low. However, construction activities including excavation, trenching, joint bay installation, and directional drilling, related to GCR works, may result in localised ground disturbance with potential indirect effects on human health through sediment mobilisation or contamination pathways.

During the operational phase, along the proposed grid connection, minor excavation of soils, subsoils and bedrock may be required where a grid fault is detected during the operational phase. These works will result in temporary disturbance of road surfaces and cable trenches/joint bays.

If consent is given for this development, then mitigation measures outlined in the Construction Environmental Management Plan (CEMP) and mitigation measures when minor excavation due to grid fault is required should be fully implemented and secured by condition of consent.

Water:

In Chapter 8 of the EIAR, the applicant states that no water network infrastructure (i.e., sewer or watermains) was identified within or immediately surrounding the proposed wind farm site or along the Grid Connection Route.

The EIAR identifies potential indirect interactions with water receptors including local rivers, private wells, and regional water supplies.

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, with particular emphasis on:

- surface water protection,
- spill prevention,
- and management of excavated material.

Traffic and Access:

The applicant states the following in relation to the proposed GCR, to mitigate the impact on the road network, at the time of the construction work and in advance of any required road closure, the appointed Contractor shall consult and comply with the Roads Authority, An Garda Síochána and other Emergency services to agree a suitable diversion route prior to implementing a road closure.

In addition, the applicant has stated, to mitigate the impact of the cable laid within public roads, the reinstatement works will be backfilled and reinstated as soon as practicable. The reinstatement works will be undertaken in accordance with the "Purple Book" best guidance and practices. The proposed reinstatement and construction details and phasing will be agreed with associated Local Authorities in advance of the works. The Contractor will be responsible for arranging for the required road opening licence

The risk of major accidents and/or natural disasters resulting from a road traffic accident will be reduced by the implementation of a construction phase Traffic Management Plan (TMP). This plan will be further refined and agreed with Leitrim County Council (and Sligo/Donegal County Councils) prior to commencement, the applicant has advised.

While the assessment concludes that impacts are not significant, the NEHS considers that local road conditions and observed traffic patterns indicate a higher potential for community disruption than reflected in the predictive modelling.

It is the NEHS opinion that prolonged road closures combined with increased construction traffic on narrow rural roads may affect access to homes, schools, and community facilities and increase safety risks for vulnerable road users.

Construction Environmental Management Plan (CEMP):

The CEMP provides a framework for environmental protection during construction. The NEHS considers that adequate protection of public and environmental health can be achieved provided all mitigation measures are fully implemented, monitored, and enforced.

Key requirements include:

- protection of water supplies,
- dust suppression measures,
- drainage protection,
- waste management controls,
- and site environmental monitoring.

It is noted that pest control is referenced only in general terms and is not developed into a specific pest management programme for protection of nearby sensitive receptors.

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). The unit recommends that early engagement with the appropriate registering authority is undertaken to ensure compliance with Tobacco legislation.

Recommendations:

Should permission be granted, the NEHS recommends the following:

1. Communication to all sensitive receptors within close proximity of the substation construction site and GCR location as work progresses along the route, to provide advance notice when work will be taking place at that a particular location.
2. Implementation of construction noise curtailment measures and defined working hours.
3. Full implementation of water protection measures under Chapter 8 Water and the CEMP.
4. Receptor-specific dust management and monitoring near sensitive locations.
5. Traffic management measures to ensure safe access to homes, schools, and businesses.
6. A pest control plan should be implemented throughout the construction phase to protect workers and sensitive receptors, including nearby residences, schools and food premises. Construction activities should ensure that drains and sewers are not damaged or left open, in order to prevent rodent access and infestation.
7. Compliance with food safety legislation where applicable (Regulation (EC) No. 852/2004).
8. Compliance with tobacco legislation with Section 47 of the Public Health (Tobacco) Act 2004 where applicable for any temporary smoking facilities on site.

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,

Carmel Moran

Environmental Health Officer

Environment Network Support Unit

HSE National Environmental Health Service

Marie Matthews

Principal Environmental Health Officer