



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Environmental Health Service,
HSE West,
Civic Offices,
Limerick Road,
Nenagh,
Co. Tipperary.

Tel: 067-46601
Fax: 067-46620

30.04.19

The Secretary
An Bord Pleanála,
64 Marlborough Street,
Dublin 1

AN BÓRD PLEANÁLA

LOG- _____
ABP- _____

03 MAY 2019

Fee: € _____ Type: _____

Time: 9.19 By: POS ✓

Planning Authority: An Bórd Pleanála

Reference: ABP-304028-19

Our Reference Number: 919

Applicant: Limerick City & County Council c/o Tom Phillips & Associates, 80
Harcourt Street, Dublin 2.

Proposed Development: Mixed-use development – Opera Site, Limerick

Dear Sir/Madam,

Please find enclosed the HSE consultation report in relation to the above proposal.

If you have any queries regarding any of these reports, the initial contact is Anne Moriarty, Principal Environmental Health Officer, who will refer your query to the appropriate person.

The following HSE departments were made aware of the consultation request for the proposed development on 22-03-2019:

HSE Emergency Planning

HSE Estates

HSE Health Protection

Mr. Bernard Gloster – Chief Officer, HSE

Environmental Health Report

The EH service response to the proposal is in the attached consultation report.

- The assessment is based on an assessment of documentation submitted to this office on April 3rd 2019 by Tom Phillips & Associates
- A site visit was conducted on 11.04.19.
- 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.
- This report refers only to those sections of the documents which are relevant to the HSE.

We have made observations and submissions under the following specific areas

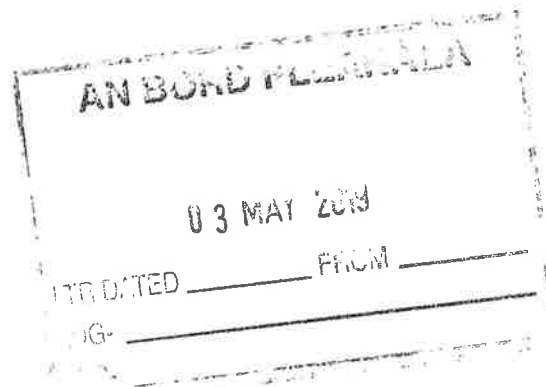
- Human Health
- Water
- Air

All correspondence or any queries with regard to this report including acknowledgement of this report should be forwarded to me at the above address.

Yours sincerely,



Anne Moriarty
Principal Environmental Health Officer



03 MAY 2019

LTR DATED _____ FROM _____

DG- _____

HSE EIS SUBMISSION REPORT

Environmental Health Service Consultation Report

(as a Statutory Consultee (Planning and Development Acts 2000 & Regs made thereunder))

Type of consultation:	Environmental Impact Assessment Report (Including Health Impact Assessment)
Planning Authority:	An Bórd Pleanála
Reference:	ABP-304028-19
Our Reference Number:	919
Applicant:	Limerick City & County Council c/o Tom Phillips & Associates, 80 Harcourt Street, Dublin 2.
Proposed Development:	Mixed-use development – Opera Site, Limerick

Introduction

The application concerns the a large-scale demolition and construction project which aims to regenerate part of Limerick city centre known as "The Opera Site". The buildings located within the curtilage of the site are of varying characteristics, some will be demolished to make space for a public square, while others will be retained and augmented to provide a mix of public buildings, commercial units, office spaces and residential properties.

The area surrounding the site is a city centre area, comprising a mix of commercial, residential and office accommodation. This office has previously commented on a similar application for this site in 2008 and the plans have been revised in the intervening period.

There has been extensive public consultation on this project as well as consultation with many other interested parties (State bodies, statutory consultees etc.).

EIAR

For the purposes of this report, this office has examined the application with reference to the impact of public health under the headings of:

- Health Impact Assessment
- Noise
- Air quality

Health Impact Assessment

The EIAR has merits from a health perspective, in that it has provided a Health Impact Assessment within the report. The HIA looks at the wider determinants of health and identifies the following as health gains:

- Less derelict buildings in a residential area
- Visual amenity will be improved arising from architecture, landscaping and planning
- Employment will be increased due to the nature of the buildings proposed – retail/catering establishments/offices
- Less traffic will arise due to increased pedestrianization area and the reduced number of car parking spaces and increased number of bicycle spaces.

03 MAY 2019

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Noise

The EIAR has divided the impact from noise into two phases – construction and operational. The Applicants have assessed the project with reference to BS 4142 'Methods for rating and assessing industrial and commercial sound' (BSI, 2014e) and BS 5228:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites'.

Baseline studies have been carried out using 12 Noise-Sensitive Receptors, some of which have been assumed to have residential aspects even where not established.

Construction phase:

The impact on some of these NSRs during the construction phase was envisaged as being significant due to the location of the NSRs relative to different aspects of the site such as access/egress and proximity to piling points.

Mitigation is therefore necessary in the form of:

- The erection of acoustic barriers (site hoarding or similar) around noisy processes and machines such as generators, heavy plant and heavy-duty compressors.
- Only plant and equipment which complies with EU noise emission requirements shall be used.
- High noise-emitting plant shall be located as far away from NSRs as possible.
- All vehicles servicing the site will be discouraged from idling around the perimeter of the site.

Due to the high number of noise-sensitive receptors in proximity to the site and the nature of the works which will be carried out, it is recommended that noise-generating activity would be restricted to the following hours:

Monday to Friday	08.00hrs to 18.00hrs
Saturday	08.00hrs to 13.00hrs
Sunday and Bank Holiday	No activity

Operation Phase:

The EIAR does not predict noise from the operational phase to be significant, but noise may generate from items such as air-conditioning units, air extraction units, service vehicles. It is recommended that all service yards for businesses will be enclosed in accordance with good planning practice and all air extraction units will be installed in accordance with the SEAI Code of Practice - Ventilation- Mechanical Extract Ventilation (MEV) + Mechanical Ventilation with Heat Recovery (MHVR).

Air Quality

The EIAR predicts air quality will be affected negatively during the construction phase, with insignificant impact in the operational phase.

Construction phase:

The EIAR identifies that the main issue arising from the construction phase will be fugitive dust emissions. Mitigation is proposed as follows:

- Sampling programme to be put in place around perimeter of site
- A full Asbestos survey has been undertaken and a specialist removal contractor has been enlisted.
- Damping down and "Soft strip" of all buildings before demolition
- Ensure no stockpiling of stripped topsoil or excavated materials – remove from site as quickly as possible.
- Exposed dusty piles to be covered with hessian or topsoil to avoid/minimise dust emissions.
- All trucks to be covered with tarpaulin before exiting the site.
- Water bowsers to be employed to spray on-site roads and no dry sweeping of roads to be carried out.

Odour –

The EIAR does not identify any issue with odour. However, included in the plans is the proposal to close in the existing culvert which traverses the site. It is proposed to lay the replacement foul and storm drains beforehand, in order that all sewage can be diverted immediately before decommissioning the culvert.

It is the experience of this office during similar previous projects (Limerick Main Drainage, various town drainage works) that complaints regarding foul odour may arise during the culvert sealing process.

It is recommended that the time the culvert is opened for be kept to a minimum and that it should be cleaned down internally and sealed before it is closed off.

General:

Pest Control

There are a number of factors with this application which may cause pest control to be problematic for nearby businesses and residences:

- Demolition of buildings – unoccupied buildings may be home to rodents and demolition of these will cause rodents to seek new nesting grounds
- Opening sewers – many of the city sewers are home to rodents and opening the sewer may cause dispersion of same
- Poor on-site waste management - it is proposed that an on-site canteen will be put in place. It is important that all Construction workers and contractors are familiar with the Construction Methodology and Phasing Management Plan (CMPP). The plan describes good waste management practice and designates a site manager who must oversee regular site inspections for waste management.

Mitigation:

A pest control contractor is required for the project, who will ensure all buildings will be surveyed and, if necessary, baited for an appropriate period before demolition begins.

Interaction with the public

It is recommended that an information board would be erected close to the site entrance which would contain contact details to which the general public may voice complaints or concerns. This information should also be made available to the local authority customer care services. The CMPP should also specify the timeframe for responding to complaints and this should be reviewed periodically.

Canteen

The plans detail that a canteen will be provided for workers on-site, but it is not clear whether this will be a food business or just eating facilities. If the provision of food is proposed in the canteen, the operators are required to register the business with the HSE Environmental Health office and the structure and operation will be assessed in accordance with the relevant food hygiene legislation.

