Lisheenkyle N.S.,
Oranmore,
Galway.
H91 YR20

22nd April 2026

An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1,
D01 V902

RE: FORMAL OBJECTION TO PLANNING APPLICATION PA07.324113

SID: Cashla Peaker Plant, located at Rathmorrissy and Pollnagroagh, Athenry, Co. Galway

Applicant: Bord Gáis Energy Limited

Submitted by: Daithi Cronin, Chairperson Board of Management, Jennifer McDonnell, Secretary of the Board of Management

On behalf of: Board of Management, Lisheenkyle National School

Dear Members of An Coimisiún Pleanála,

We are writing to you as the Board of Management of Lisheenkyle National School, a rural primary school in Lisheenkyle, Athenry, Co. Galway.

Our school has been part of this community for over 75 years. There are currently over 230 children on the roll in the school from Junior Infants to 6th class. A morning club at the school opens at 8 a.m., and afterschool operates until 5pm daily. There is a pre-school on the site and after-school activities and summer camps operate during school closure periods.

We are writing because the proposed Cashla Peaker Plant at Rathmorrissy and Pollnagroagh will be built 2.8 kilometres from our school and will run an underground cable route within 0.6 kilometres of our school, along the road that our families and school transport use regularly. We are writing because, having read the applicant's 823-page Environmental Impact Assessment Report (EIAR), we have concerns over the potential air pollutants that the plant will generate, the noise pollution in the area and the disruption to roads accessing the school.

This letter sets out what we found in the EIAR and what we are asking An Coimisiún Pleanála to do about it.

1. Our School, Our Children, Our Community

Lisheenkyle National School is a mixed, Catholic primary school serving the rural community of Lisheenkyle and a broader catchment that includes families from Athenry town and surrounding areas. We hold five Green School Flags for Litter and Waste, Energy, Water, Travel, and Biodiversity. We have our own 11kW wind turbine, and have recently had solar panels installed. We have an eco-school garden where children tend their own plants. We also have developed an outdoor wellness garden, an outdoor sensory learning space, an outdoor woodland classroom, directly behind our school, where children visit to learn about nature, biodiversity, and the living environment around them.

We are concerned about the impact that the proposed development will have on our children's outdoor activities and the biodiversity of our school if it proceeds without a proper assessment of its impact on our children and our environment.

1.1 Where We Are Relative to the Proposed Development

The applicant's own EIAR confirms our position precisely. At Volume 2, Chapter 4, page 193, the EIAR states: *"Lisheenkyle National School is a mixed, Catholic Primary School located southwest of the Proposed Project off Lisheenkyle West. Located approximately 0.6 km from the Proposed Project [the grid connection cable route] (approximately 2.8 km south west of the Proposed Main Project Site)."*

The 0.6 km distance is from the underground cable corridor, which will be laid along Lisheenkyle East Road (L7108) and this is the road that many of our school community travels

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to access the school. The 2.8 km distance is from the main gas turbine plant and 30-metre stack at Rathmorrissy.

The EIAR (Volume 2, Chapter 7, Figure 7-2) confirms that the Athenry meteorological station — 1.6 km from the proposed plant — recorded predominantly westerly and south-westerly winds over the five-year period 2020 to 2024 (Met Éireann, 2025, cited in the EIAR). Our school lies to the south-west of the proposed plant. We are in the downwind corridor under prevailing conditions.

2. What the EIAR Says About Us — and What It Doesn't

> **The EIAR identifies Lisheenkyle National School as the closest school to the proposed development and the closest school to the underground cable route. It then excludes our school from its air quality model, its noise assessment, and its health impact assessment. Our children were identified and then omitted. We set out the evidence for this below, drawn entirely from the applicant's own document.**

The EIAR references our school at four points in the document. Each reference is in the context of access, traffic, or community facilities. Not one reference places our school in the air quality model, the noise model, or the human health impact assessment. The following are the specific findings from our review of the EIAR:

Finding 1: EIAR Volume 2, Chapter 4, p.193 — Our school is named as the closest school to the proposed development, located 0.6 km from the cable route and 2.8 km from the main plant.

Finding 2: EIAR Volume 2, Chapter 4, Table 4-16, p.198 — Under the 'School' category, zero receptors are listed within the 500m study area. Our school appears only in the 'closest identified' column, outside the assessed area.

Finding 3: EIAR Volume 2, Chapter 4, p.207 — 'Education and Training' is formally scoped out of the human health assessment. The only reason given is road access disruption. Lisheenkyle National School is named only in that context.

Finding 4: EIAR Volume 2, Chapter 7, Figure 7-4, p.380 — The AERMOD air dispersion model uses discrete residential receptors labelled AQ. No receptor is placed at our school. The model was not run for our school location.

Finding 5: EIAR Volume 2, Chapter 9, Table 9-11, p.453 — The five Noise Sensitive Locations (NSLs) in the noise model are all residential (R01 to R05). No educational establishment is listed. Our school is absent.

Finding 6: EIAR Volume 2, Chapter 4, Table 4-17, p.203 — The EIAR identifies children and adolescents as having *'high sensitivity to air quality'* (citing EEA footnote 54) and *'high sensitivity to noise'* (citing EEA footnote 55). It then applies neither finding to our school.

Finding 7: EIAR Volume 2, Chapter 1, p.80 — The EIAR's own consultation record states that the most frequently raised concern at public information events was *'the potential health impacts of the plant, particularly in proximity to schools and homes.'* The applicant was told about school health concerns and did not act on them.

3. The Air Quality Assessment Does Not Cover Our School

3.1 How the AERMOD Model Was Set Up

The applicant used the AERMOD dispersion model (described in EIAR Appendix 7.1) to predict ambient concentrations of nitrogen dioxide (NO2), sulphur dioxide (SO2), particulate matter (PM2.5 and PM10), and other pollutants at receptors around the proposed plant. AERMOD is the standard U.S. EPA regulatory dispersion model and is appropriate for assessing industrial point source emissions.

The meteorological input data was processed using AERMET (EIAR Appendix 7.2), fed from Athenry meteorological station located 1.6 km from the site, covering five years of data (2020–2024). The surface roughness input used for the modelling is based on an area-weighted land use classification of 50% grassland and 40% cultivated land within a 1 km radius of Athenry (EIAR Appendix 7.2, Table 1). This is the flat, open, karst grassland terrain of east Galway — low roughness, low turbulence, meaning plumes travel farther and disperse less quickly than they would in rougher urban terrain.

The EIAR (Volume 2, p.379) confirms that the model used three receptor grids: an outer 10 × 10 km grid at 200m intervals, a medium 3 × 3 km grid at 50m intervals, and a small 1 × 1 km grid at

25m intervals. Individual discrete receptors were also placed at residential properties labelled AQ (Figure 7-4).

3.2 Why the AERMOD Results Cannot Be Applied to Our School

Our school at 2.8 km from the plant falls within the medium 3×3 km grid, where concentrations are calculated at 50-metre intervals. A grid point therefore exists near our school location. However, this is not the same as assessing our school. There are several critical reasons why the AERMOD results as presented in the EIAR cannot be applied to Lisheenkyle National School:

- No discrete receptor was placed at the school building. The grid provides ambient concentrations at fixed 50m intervals across a large area. It does not represent the specific location of our school's playground and outdoor classroom.
- The model uses a breathing height of 1.5 metres for all human receptors (EIAR Volume 2, p.379). This is appropriate for adults. The children in our Junior classes breathe at between 0.9 and 1.1 metres above the ground. Ground-level pollutant concentrations are higher than at 1.5 metres, particularly for plume configurations affected by building downwash (PRIME algorithm, described in EIAR Appendix 7.1). The model has systematically underestimated exposure for our youngest children.
- The AERMOD model as described in Appendix 7.1 uses a steady-state Gaussian framework. The EIAR does not present transient emission profiles for gas turbine start-up cycles. As the EIAR itself notes at Chapter 8, Section 8.7.2: *'There are no specific measures proposed to mitigate the GHG emissions of the operational phase.'* A peaker plant's worst emission periods are during start-up and shut-down — these transient states are not modelled.
- The EIAR's own building downwash analysis (AERMOD with PRIME, Appendix 7.1) was conducted to assess how the turbine enclosure buildings affect plume behaviour near the plant. The PRIME algorithm increases ground-level concentrations in the near field by drawing the plume downward in the building wake. While this effect diminishes with distance, it further increases the importance of accurate receptor placement. The model's building downwash results apply closest to the source — but no downwash-informed receptor was placed in the direction of our school.

In summary: there is a grid point in the AERMOD output near our school, but no discrete school receptor was placed there, the breathing height used is inappropriate for young children, transient emissions are unmodelled, and our outdoor learning spaces are entirely unaddressed. The EIAR's air quality compliance conclusions do not apply to our children.

3.3 Prevailing Winds Place Our School in the Downwind Corridor

The meteorological data processed through AERMET and used to drive the AERMOD model is drawn from Athenry station over 2020–2024. The EIAR (Volume 2, Chapter 7, Figure 7-2) shows a clear predominance of westerly and south-westerly winds at this location over the modelling period. Our school sits to the south-south-west of the proposed plant. Under the most frequent meteorological conditions recorded at the site, combustion emissions — including NOx, PM2.5, and PM10 — will be transported in the direction of Lisheenkyle N.S.

The surface roughness inputs used in AERMET (Appendix 7.2, Table 1) show that the land is predominantly open grassland at low roughness values (0.05 in spring, 0.10 in summer). Low surface roughness means less turbulent mixing and less vertical dispersion as the plume travels downwind. Plumes remain more concentrated at ground level over longer distances in this type of terrain. This is the terrain in which our school is situated.

3.4 Children's Vulnerability to Air Pollution

The EIAR (Volume 2, Chapter 1, p.80) records that the most frequently raised concern at the applicant's own public information events was

"the potential health impacts of the plant, particularly in proximity to schools and homes."

We wish to bring the following admission from the EIAR to the attention of An Coimisiún Pleanála. At Volume 2, Chapter 4, Table 4-19 (p.211), the applicant states:

> *"Children and adolescents are considered to have a high sensitivity to air quality as they are particularly vulnerable to air pollution because their bodies, organs and immune systems are still developing." (EIAR footnote 54, citing European Environment Agency, "Air pollution and children's health")*

Although the applicant included this acknowledgement in their application, the EIAR was prepared and submitted without a single discrete air quality receptor at our school, the nearest school to the proposed development.

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3.5 Outdoor learning environment

Our children spend significant time outdoors in a learning and playful environment. Outdoor physical education, sports activities, sensory activities, learning and play happen on our school grounds every day. Children have outdoor lessons and use our outdoor wellness garden and sensory garden.

Outdoor exposure to air pollution is more significant than indoor exposure for most pollutants because outdoor concentrations are higher and ventilation-rate during physical activity is higher. A four-year-old running in the playground is breathing at approximately five to eight times the rate of a resting adult. The AERMOD model referenced in the application uses a 1.5m breathing height which does not provide accurate assessment data on the impact of children and does not model outdoor activity exposure rates.

4. Noise, Construction, and Our Children's Learning

The EIAR (Volume 2, Chapter 9, Table 9-11, p.454) lists five Noise Sensitive Locations — all residential properties. **Lisheenkyle National School is not listed.** EPA Guidance Note NG4 explicitly defines educational establishments as noise sensitive locations. Our school was omitted from the noise assessment, by definition in violation of the applicable guidance.

The EIAR (Volume 2, p.282) states that

> *"the indicative total construction noise for the UGC route was calculated as 87 dB at 10 metres from the works."*

Cable laying on Lisheenkyle East Road (L7108) will proceed at 30 to 50 metres per day. L7108 runs directly past the approach to our school. The noise level predicted at 10 metres from active cable trenching is comparable to a pneumatic drill or a heavy lorry engine at close range. This is not a background hum, rather it is intense, disruptive noise.

The EIAR (Volume 2, Table 4-19, p.211, footnote 55) cites the European Environment Agency on the impact of environmental noise on children, stating that

> *"there is growing evidence to suggest that children that are exposed to transport noise at school or at home are more likely to suffer certain types of cognitive, learning, behavioural problems and obesity."*

Having cited this, the applicant assessed noise at five residential receptors and left our school unmodelled.

The WHO Environmental Noise Guidelines for the European Region (2018) recommend classroom noise levels not exceeding 35 dB LAeq for effective learning. Construction noise from active cable trenching 0.6 km away, at 87 dB at 10m source level, warrants specific assessment at our school. No assessment was conducted at the school.

5. Road Safety and Our Children's Journey to School

5.1 Access roads to the school

The proposed development will have a serious impact on the journey to our school for many of our families and school community.

Many families travel from Athenry town along the L3103 and then the L7108 to the school. Both of these roads will be directly affected by this development during construction and operation.

The L3103 runs directly past the proposed development access gate. The L7108 — Lisheenkyle East Road — runs toward our school and is the road that families with children in the Lisheenkyle area use to walk and cycle to school.

Children from the immediate area around our school walk or cycle to school along the L7108. Families from Athenry town and other areas arrive by car, entering on the L3103 before turning onto the L7108. These two roads together form the complete journey to our school for many of our school community.

5.2 The L7108 Road — A Road Too Narrow for Construction Traffic

The L7108, Lisheenkyle East Road, is the road that children who walk or cycle to school use daily. It is also the road where the underground cable will be laid for three months, with a further two months of resurfacing works — a total of five months of sustained construction activity (EIAR Volume 2, Chapter 2, Table 2-4, p.108).

Table 2-4 - Closure Periods for UGC Installation

Construction Activity	Total Duration	L3103	Lisheenkyle East (L7108)	L7109
Main Cable Construction	6 months	1 month	3 months	2 months
Resurfacing	4 months	3 weeks	2 months	1.5 months

This road is exceptionally narrow. It is not an ordinary rural road. It is a road where most traffic must pull into a passing place or onto a grass verge to allow an oncoming car to pass. In large sections, two cars cannot safely pass each other on the road width alone.

The EIAR itself confirms at Volume 2, Chapter 2, p.108 that

> *"due to limited road width along Lisheenkyle East (L7108) and L7109 roads, full road closures will be required."*

The applicant's own assessment concluded the road was too narrow for two-way traffic even without construction works. During the proposed works, the road will host trenching machinery, excavation equipment, generators, and cable installation vehicles for up to three months.

Children who walk or cycle to school along this road have no footpath and no cycle lane. The EIAR (Volume 2, Chapter 4, p.254) confirms the roads are *"typically bordered by low walls, and narrow grass verges"* with no segregated pedestrian or cyclist facilities. A construction vehicle on the L7108 during active cable laying works would leave a child walking to school with no safe space.

The EIAR (Volume 2, p.282) confirms construction noise on the UGC route at 87 dB at 10m — a level that would cause distress to a young child passing on foot or bicycle. The EIAR does not address the safety of children and cyclists on this road during active works.

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5.3 Full Road Closure of the L7108 During School Term

The EIAR (Volume 2, Chapter 2, Table 2-4, p.107) confirms that Lisheenkyle East Road (L7108) will be fully closed to through traffic for three months during cable installation, followed by a further two months of resurfacing — a total of up to five months. During this period, the road that children who walk or cycle to school will be a construction site.

The proposed diversion route for L7108 closure is via L7109 to R339 to L3103 — adding approximately 5 km of extra travel (EIAR Volume 2, p.108). For a family who lives on the L7108 and normally walks their child to school, there is no safe walking or cycling diversion. The EIAR (Volume 2, Chapter 4, p.224–226) acknowledges that "the disruption to access...can be anxiety inducing" and that community assets including Lisheenkyle National School may be affected. The closure of an access road to our school for five months is a major disruption.

The EIAR (Volume 2, Chapter 2, p.119 and Chapter 10, p.484) states that abnormal loads will be timed "outside of school closing hours". No assessment has confirmed that the specific arrival and departure patterns of our school community are safely outside all abnormal load movements.

6. Major Accident Risk

The proposed development stores two diesel tanks each of 3,335 m^3 capacity — a total of 6,670 m^3 of low-sulphur diesel fuel on site (EIAR Volume 2, p.700). It operates under a lower-tier COMAH classification. The EIAR (Volume 2, Chapter 15) identifies credible major accident scenarios.

Our school has over 230 children and staff present from 7:50 am until 5 p.m. and beyond. In the event of a major incident at or near the Cashla plant, emergency services would need to access the site via the L3103. The EIAR does not identify our school as a specific receptor for emergency response planning. It does not address how 230 children who attend our school, would be protected or managed in such an event.

We raise this not to suggest a major accident is likely, but because the EIAR acknowledges the risk exists and does not address it in the context of the closest school to the proposed development.

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7. Our Formal Position and What We Are Asking For

The Board of Management of Lisheenkyle National School formally objects to the grant of planning permission for the proposed Cashla Peaker Plant development, Planning Reference PA07.324113.

Our objection is based entirely on what the applicant's own EIAR confirms and fails to do. We summarise our core findings below, followed by the specific actions we request.

7.1 Summary of EIAR Failures in Relation to Our School

- The EIAR names us as the closest school (0.6 km from cable route, 2.8 km from plant) but places no discrete AERMOD receptor at our school and draws no air quality conclusions for our children (EIAR Volume 2, Chapter 7, Figure 7-4, p.380 — and EIAR Appendix 7.1 and 7.2 confirm the modelling setup that excluded us)
- The AERMOD model uses a 1.5m breathing height for all receptors (EIAR Volume 2, p.379). The young children in our junior classes breathe at 0.9 to 1.1 metres. Ground-level concentrations are higher than at 1.5m, meaning even grid-based modelling results are not directly applicable to our youngest children.
- The surface roughness inputs in AERMET (Appendix 7.2, Table 1) reflect flat, open grassland — terrain that allows plumes to travel farther and remain more concentrated. This increases, not decreases, the importance of a school receptor at 2.8 km
- The noise model contains only five residential NSLs. Our school is not among them (EIAR Volume 2, Table 9-11, p.453). This violates EPA Guidance Note NG4 which defines educational establishments as NSLs
- The education and training health determinant was formally scoped out of the human health assessment (EIAR Volume 2, Chapter 4, p.207)
- The EIAR cites EEA evidence on children's high sensitivity to air pollution and noise (Table 4-17, p.203, footnotes 54 and 55) but applies neither to our school.
- The L7108, one of our main access roads, will be fully closed for up to five months of construction activity. No child safety assessment for this road during works was conducted.
- The applicant's own consultation record confirms school health was the most frequently raised public concern (EIAR Volume 2, Chapter 1, p.80).

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8.2 Specific Actions We Request

If An Coimisiún Pleanála is considering granting permission, we ask that no determination issue unless and until the following have been completed and published:

Air Quality

- A discrete AERMOD receptor must be placed at Lisheenkyle National School and full air quality modelling results reported for all operational scenarios including start-up and shut-down cycles
- The assessment must use a breathing height appropriate for pre-school and primary school children (0.9 to 1.1 metres, not 1.5 metres) to reflect the actual exposure of our youngest pupils
- A specific health impact assessment must be conducted for school-aged children engaged in outdoor physical activity, using activity-appropriate ventilation rates and age-appropriate health benchmarks consistent with the EEA guidance the EIAR itself cites in footnote 54
- The assessment must address long-term cumulative exposure for children attending our school throughout the 25-year operational life of the plant
- The applicant must provide a written explanation of why our school — named in its own EIAR as the closest school to the development — was not modelled as a discrete receptor, and not assessed in the human health chapter

Noise

- A specific noise assessment at Lisheenkyle National School must be carried out, using EPA NG4 methodology, for both the construction phase — particularly during active cable trenching on L7108 within 0.6 km of the school — and the operational phase
- The assessment must demonstrate compliance with WHO Environmental Noise Guideline values for educational environments (35 dB LAeq) in our classrooms during all relevant construction and operational periods

Road Safety and School Travel

- A specific road safety assessment must be conducted for the L7108 during the full closure period, addressing the safety of children who walk and cycle to school on this road, and

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identifying safe alternative arrangements for these children during the five months of construction activity

- A dedicated school community access plan must be prepared for the L7108 closure period, in direct consultation with our school, identifying safe walking, cycling, and vehicle drop-off arrangements for our pupils and their families

Major Accident

- Our school must be identified as a sensitive receptor in the major accident consequence assessment, with specific emergency response, communication, and child protection procedures developed for the 230 children, present on our site

Consultation

- Direct written engagement with our Board of Management must take place before any revised assessment is submitted

We ask An Coimisiún Pleanála to refuse this application until the impact on the children in our school is properly assessed, properly considered, and properly protected.

We thank An Coimisiún Pleanála for considering this submission and trust that the safety and health of our school community will be given the weight it deserves.

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Yours faithfully,

Daithí Cronin,

Chairperson, on behalf of the Board of Management

Lisheenkyle National School, Oranmore, Galway.

Jennifer McDonnell

Principal, Board of Management

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22nd April 2026

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