



PRESENTATION COLLEGE ATHENRY
Helping Students Achieve...Since 1908

Presentation College Athenry

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16th April 2026

An Coimisiún Pleanála

64 Marlborough Street, Dublin 1, D01 V902

FORMAL THIRD PARTY OBSERVATION

Case Reference: PA07.324113

Development: Construction of an Open-Cycle Gas Turbine Power Plant, Above Ground Installation and Ancillary Development — Cashla Peaker Plant, Pollnagroagh and Rathmorrissy, Athenry, Co. Galway

Applicant: Bord Gáis Energy Limited

Submitted by: Mr. Cathal Moore, Principal/Secretary of the Board of Management, Presentation College Athenry

1. Introduction and Standing

Presentation College Athenry is a voluntary co-educational secondary school located at Ballygarraun South, Athenry, County Galway. We operate under the trusteeship of CEIST (Catholic Education — An Irish Schools Trust) and have served the communities of Athenry and its wider rural catchment since 1908. We have a current enrolment of 1,081 students — 528 male and 553 female and over 100 members of staff making us one of the largest secondary schools in County Galway.

Our school is located approximately 2.5 kilometres from the proposed Cashla Peaker Plant at Pollnagroagh and Rathmorrissy. We are the largest single concentration of young people in the vicinity of this proposed development. We are a co-educational school offering Junior Certificate, Transition Year, and Leaving Certificate programmes. Our students regularly compete at county and provincial level in Gaelic football, hurling, camogie, soccer, and athletics. Outdoor physical activity is a central part of the life of this school.

We have reviewed the applicant's Environmental Impact Assessment Report (EIAR, Volume 2, Main EIAR rev7 Final, 0114485DG0005) in preparing this submission and have found in that document the basis for our objection.



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1.1 School Hours and Occupancy

Our school is in active use across an exceptionally wide range of hours. This is directly relevant to this planning application because it means our students are present and active including outdoors on our sports fields during the vast majority of all hours in which this plant will be operational.

- Our school opens at 07:45 a.m. each weekday morning
- Students are present until 7:20 p.m. Monday to Thursday for supervised evening study, extracurricular activities, and sports training
- School finishes at 4:45 p.m. on Fridays.
- Supervised study runs on Saturday mornings and some Sunday mornings throughout the academic year.
- Outdoor physical education, competitive sports training, match days, and athletic competitions take place on our playing fields throughout the school day and into the evening.
- In addition a number of local clubs use the School facilities in the evenings and at weekends.

The proposed peaker plant is an open-cycle gas turbine that operates on demand when electricity prices peak typically in the late afternoon and evening. The EIAR (Volume 2, Chapter 2, p. 87) confirms the plant is designed to start rapidly and generate during periods of peak grid demand. Our students are outdoors training, competing, and travelling home precisely during those peak demand periods. This is not a coincidence of scheduling that can be designed away; it is the fundamental nature of both a peaker plant and a secondary school.

2. What the EIAR Says About Our School — And What It Fails to Do

Having read the applicant's 823-page EIAR in full, we have found that Presentation College Athenry is mentioned three times. On every occasion, the reference is in Chapter 6 (Landscape and Visual Impact Assessment) only. Our school does not appear in Chapter 4 (Population and Human Health), Chapter 7 (Air Quality), Chapter 9 (Noise and Vibration), or any other chapter dealing with environmental impact on people. We have not been assessed. Our 1,081 students have not been considered. This is the central and most serious failure of this entire planning application, and we ask An Coimisiún Pleanála to treat it as a material omission.

2.1 How the EIAR Uses Our School

The three references to Presentation College in the EIAR are as follows:

First, at EIAR Volume 2, Chapter 6, Section 6.2.3.3 (p.316), the school is listed as a "public building" in the visual receptor inventory for landscape impact assessment purposes, alongside Teagasc Mellows Campus.

Second, at EIAR Volume 2, Chapter 6, Section 6.2.3.6 (p.317), the applicant states: "The ZTV suggests there will be no views to the proposed main project site from the ground floor areas of Presentation College and Clarin College, Athenry." The school is named here specifically to dismiss any visual concern.

Third, at EIAR Volume 2, Chapter 6, Viewpoint 11 description (p.320), the applicant notes that "visual receptors at or near this viewpoint primarily consist of users of the local lane and students or staff of the nearby Presentation College Athenry." Again, our students are mentioned only in the context of what they can or cannot see.

The applicant was therefore aware of our school. It identified our students as visual receptors. It named us in its landscape chapter. It then omitted us entirely from its health, air quality, noise, and human health assessments. Our school is good enough to name when it helps the applicant argue there is no visual impact. It becomes invisible when it would require additional assessment work.

2.2 How the EIAR Treats Schools in Its Human Health Chapter

Chapter 4 of the EIAR (Population and Human Health) identifies sensitive receptors within the study area. At p.198, the EIAR states: "Lisheenkyle National School is the closest school, located approximately 0.6 km from the Proposed Project. No other schools were identified within 500m of the Proposed Project, although it is noted that there are schools in the wider area including those in the town of Athenry, Carnmore National School and Cregmore National School."

Presentation College Athenry is not named here. We are one of "schools in the wider area." We have 1,081 students. The applicant acknowledged our existence and chose to treat us as outside the scope of its human health assessment.

Table 4-17 of the EIAR (Wider and Vulnerable Groups, p.203) identifies "families with children and adolescents" as a vulnerable group and references the European Environment Agency publication "Air pollution and children's health" (EIAR footnote 54). The EIAR therefore knew that children and adolescents are a vulnerable group requiring specific attention in relation to air quality. It did not apply that knowledge to the 1,081 adolescents at our school.

The EIAR's section on "Education and Training" (Chapter 4, p.207) explicitly scopes this topic out of the human health assessment, stating: "The project will not directly impact on Education and training however it is recognised that disruption on the local road network means there is a potential for access issues for local residents to education and training facilities including schools such as Lisheenkyle National School." Only Lisheenkyle National School is named. Presentation College Athenry is not mentioned even in this scoped-out section. The applicant formally decided that our school was not a topic requiring assessment.

2.3 Air Quality Modelling — Our School Is Not in the Model

Chapter 7 of the EIAR (Air Quality) uses AERMOD dispersion modelling to predict ambient concentrations of nitrogen oxides (NO_x), sulphur dioxide (SO₂), carbon monoxide (CO), and particulate matter at sensitive receptors. Figure 7-4 of the EIAR (p.380) shows the "Sensitive Human Health Receptors Included in Operational Phase Air Dispersion Modelling Assessment." The EIAR states at p.380: "The impact of the emission sources was also measured at nearby residential receptors (AQ) which were added to the model as discrete receptors."

The receptors modelled are residential properties only. No receptor has been placed at or near Presentation College Athenry. No calculation has been performed to predict what concentration of NO_x, PM_{2.5}, PM₁₀, or other combustion pollutants will be present at our school grounds during plant operation. The EIAR presents compliance conclusions for residential receptors and draws conclusions about overall air quality acceptability. Those conclusions cannot be applied to our school because our school was not modelled.

2.4 Noise Assessment — Our School Is Not in the Noise Model

Chapter 9 of the EIAR (Noise and Vibration) identifies Noise Sensitive Locations (NSLs) in the study area. Table 9-11 of the EIAR (p.453) lists all NSLs. There are five: R01, R02, R03, R04, and R05 — all described as residential properties at distances between 450 metres and 1,200 metres from the proposed building. The table contains no educational establishment of any kind.

The EPA Guidance Note NG4 on noise assessment defines noise sensitive locations to include dwellings, schools, hospitals, and similar. Presentation College Athenry is an NSL by definition under NG4. It was not included in the noise model. No noise prediction has been made at our school for operational or construction phases. The noise assessment conclusions in the EIAR cannot demonstrate acceptability at our school because the assessment was not conducted at our school.

2.5 The Applicant's Own Consultation Record

The EIAR (Volume 2, Chapter 1, p.80) records the outcome of the applicant's third public information event. It states: "The most frequently raised considerations related to emissions, and the potential health impacts of the plant, particularly in proximity to schools and homes."

The applicant therefore received direct public concern, at its own consultation event, about health impacts in proximity to schools. It did not respond to that concern by adding Presentation College Athenry to its air quality model, its noise assessment, or its human health receptor list. It received

the concern, recorded it, and proceeded without addressing it. We submit that this is not an adequate response to the public participation obligations of the EIA Directive.

3. Air Quality and the Health of Our Students

3.1 Prevailing Winds Carry Emissions Toward Our School

The EIAR (Volume 2, Chapter 7, Figure 7-2, p.371) confirms that the prevailing wind direction at the site is westerly and south-westerly. Our school at Ballygarraun South lies to the east of the proposed plant. During the dominant meteorological conditions at this site, combustion emissions from the 30-metre gas turbine stack will be carried toward Athenry and toward our school grounds. The EIAR does not model concentrations in this direction at distances relevant to our school. The compliance demonstration in Chapter 7 does not include our school as a receptor.

3.2 Exercising Students Are Exposed at Far Higher Rates Than Residential Receptors

The air quality standards against which the EIAR demonstrates compliance are ambient air quality limit values under EU Directive 2008/50/EC and associated Irish regulations. These standards protect the general population under typical exposure conditions — primarily people at rest or engaged in light activity indoors or outdoors.

Our students are not a general ambient population receptor. They are adolescents engaged in sustained vigorous outdoor physical activity for extended periods. A person at rest breathes approximately 7 to 8 litres of air per minute. A student running during PE class, training for competitive sport, or competing in an athletics event breathes between 40 and 70 litres per minute. This is five to eight times the resting ventilation rate. The dose of any ambient pollutant delivered to the lungs per minute of outdoor activity is therefore five to eight times greater for an exercising student than for a person at rest.

The EIAR itself, at Table 4-17 (p.203), references the European Environment Agency paper "Air pollution and children's health" in connection with the vulnerability of children and adolescents to air pollution. Having cited this evidence, the EIAR does not apply it to the 1,081 adolescents at our school who exercise outdoors within 2.5 kilometres of the proposed plant. The EIAR acknowledges the risk category and then proceeds as if the largest school in the vicinity does not exist.

3.3 Peaker Plants Produce Elevated Emissions During Start-Up and Shut-Down

The EIAR (Volume 2, Chapter 2, p.87) confirms that the proposed plant is an open-cycle gas turbine designed for rapid dispatch — it starts up quickly, generates during periods of peak demand, and shuts down. The EIAR (Volume 2, Chapter 8, Section 8.7.2, p. 404) states expressly: "There are no specific measures proposed to mitigate the GHG emissions of the operational phase of the proposed project." During start-up and shut-down cycles, combustion efficiency is lower than during steady-state operation and emission rates per unit of energy generated are higher. The EIAR does not present transient emission profiles for these cycles.

Our students train outdoors on weekday afternoons and evenings — precisely the period of peak electricity demand when a peaker plant is most likely to be dispatched. The combination of start-up transient emissions, prevailing winds toward our school, and exercising students with elevated ventilation rates represents a specific exposure pathway that has not been assessed anywhere in the EIAR.

3.4 Long-Term Cumulative Exposure During Developmental Years

The proposed plant is expected to operate for up to 25 years. A student starting at Presentation College Athenry this September will spend five or six years exercising outdoors within 2.5 kilometres of a gas combustion facility during the most sensitive years of their respiratory and cardiovascular development. The established epidemiological evidence — referenced in the EIAR's own footnote 54 (EEA, "Air pollution and children's health") — demonstrates that exposure to NO₂ and fine particulate matter during adolescent years is associated with reduced lung function trajectories,

increased lifetime asthma risk, and increased cardiovascular risk. No cumulative long-term exposure assessment for our student population has been carried out.

4. Noise and the Learning Environment

Our school is in continuous operation from 8:00 a.m. to 7:30 p.m. Monday to Thursday, and on many Saturday mornings. As set out in Section 2.4 above, Table 9-11 of the EIAR lists only five residential NSLs (R01 to R05). No educational establishment is included. No noise prediction has been made at our school for any phase of the development.

EPA Guidance Note NG4 defines noise sensitive locations to include educational establishments. Our school is therefore an NSL by definition and should have been included in the noise assessment. Its omission means the noise chapter cannot demonstrate acceptable noise levels at our school during construction or operation.

Our school requires a stable acoustic environment for teaching and learning across a full day and into the evening. The EIAR (Volume 2, Chapter 9, p.437) sets operational noise limits of up to 55 dB LAeq at residential NSLs during daytime. Those limits were set without reference to an educational establishment that will have students in classrooms, outdoors, and in study halls from early morning to late evening. We do not know what noise levels our school will experience because the applicant did not calculate them.

During the construction phase, the EIAR (Volume 2, Chapter 10, p.226) confirms that abnormal loads will be delivered either before 7:30 a.m. or after 9 a.m. to avoid peak construction workforce travel times. Our school opens at 8:00 a.m. The applicant's own schedule therefore places abnormal load movements on the roads serving Athenry during school arrival time. No assessment of the interaction between abnormal load routing and school arrival and departure traffic has been carried out.

5. Road Safety and Our Students' Daily Journey

5.1 Our Catchment and the Roads Our Students Use

Presentation College Athenry draws students from a wide rural catchment extending well beyond Athenry town. Our students travel to school by private car, school bus, bicycle, and on foot. A significant proportion of fifth and sixth year students drive themselves to school on rural roads surrounding Athenry. These are statistically among the highest-risk drivers on Irish roads — newly qualified or on provisional licences, driving rural roads in all weather conditions.

Chapter 10 of the EIAR (Traffic and Transportation) identifies the road network that will carry construction and operational traffic. This includes the L3103 and connecting roads that form part of the network used by students, parents, and school buses travelling to and from our school. The EIAR does not assess the interaction between development traffic and school-related traffic. It does not identify school bus routes. It does not assess the risk to young drivers sharing rural roads with HGVs and abnormal loads during school commute times.

5.2 Abnormal Load Timing and School Hours

The EIAR (Volume 2, Chapter 3, p.119) confirms that abnormal load deliveries for turbine and generator components will be timed to occur "outside of school closing hours" and "before 7:30 a.m. or after 9 a.m." to avoid peak traffic.

This is a significant admission. The applicant has recognised that its abnormal loads interact with school-related traffic to a sufficient degree to warrant scheduling restrictions. Yet it has not assessed the nature or scale of that interaction, has not identified which schools are being considered in that schedule, and has not assessed whether our school — which opens at 8:00 a.m. with students arriving from 7:45 a.m. — falls within or outside the scheduled protection windows.

The window "before 7:30 a.m. or after 9 a.m." would place abnormal loads on the road network during our school arrival period (7:45 a.m. to 8:30 a.m.) if scheduled for the morning window. The

applicant has built an acknowledgement of school traffic risk into its mitigation commitments but has not assessed whether that mitigation is adequate for the largest secondary school in the catchment.

5.3 Construction Traffic and Road Safety Over Nine Months

The EIAR (Volume 2, Chapter 10) estimates the construction programme at approximately nine months. During this period, HGV traffic will use the L3103 and connecting road network continuously. The EIAR (Volume 2, Chapter 10, p.226) confirms stop/go traffic management will be required on sections of road during cable installation works, and that some roads will be subject to full closure with diversion routes adding significant journey time.

Students travelling to our school from rural areas to the west and northwest of Athenry use roads in the vicinity of the proposed development and cable route. Diversions, stop/go controls, and HGV mixing with school traffic for a nine-month construction period represents a sustained road safety risk to our student population that has not been assessed.

6. Major Accident Risk

The proposed development is classified as a lower-tier COMAH establishment. The EIAR (Volume 2, Chapter 15) identifies credible major accident scenarios for this facility. These include vapour cloud explosions, jet fires, and pool fires associated with the storage of large volumes of natural gas and diesel fuel on site.

On any given school day — particularly in the afternoon and evening when peak electricity demand is most likely to dispatch a peaker plant — over 1,000 young people are present at our school 2.5 kilometres away. The EIAR does not assess the emergency response implications for our school. It does not identify our school in the context of major accident planning. It does not address evacuation, shelter-in-place, or emergency communication procedures for a school population of this size in proximity to a COMAH-classified facility.

We are not suggesting that a major accident is likely. We are noting that the consequences of a major accident affecting our school population would be catastrophic, and that the EIAR has not addressed those consequences. The precautionary principle requires a more thorough treatment than has been provided.

7. We Were Not Consulted

The applicant conducted public consultation events before submitting this application. The EIAR (Volume 2, Chapter 1, p.80) records that community members raised health impacts in proximity to schools as a primary concern at those events. Despite this, Presentation College Athenry has had minimal contact from Bord Gáis Energy or their agents at any stage of the pre-application process.

We have 1,081 students and a more than 100 staff. We are the largest secondary school in Athenry. We are in active use six days a week. We are located 2.5 kilometres from a proposed major industrial energy facility, directly in the prevailing downwind corridor. We were not identified as a sensitive receptor. We were not consulted. We were not assessed.

Article 6 of Directive 2011/92/EU as amended requires that the public concerned be given early and effective opportunity to participate in the EIA procedure. A school of 1,081 students that will be directly affected by the air quality, noise, and traffic implications of this development is unambiguously part of the public's concern. That opportunity was not provided to us.

8. What We Are Asking For

The Board of Management of Presentation College Athenry formally objects to the grant of planning permission for the proposed Cashla Peaker Plant and respectfully requests that An Coimisiún Pleanála refuse this application.

Our objection is grounded entirely in the applicant's own EIAR, which demonstrates the following failures:

- Our school is mentioned three times in the 823-page EIAR — all three times in the landscape chapter only, and on two occasions specifically to dismiss any visual impact concern
- Our school does not appear in the human health receptor inventory (Chapter 4, Table 4-16)
- Our school does not appear in the air quality modelling receptor list (Chapter 7, Figure 7-4)
- Our school does not appear in the noise sensitive location list (Chapter 9, Table 9-11)
- The education and training determinant of health was formally scoped out of the human health assessment (Chapter 4, p.207) without reference to our school
- The applicant's own consultation record (Chapter 1, p.80) confirms it received public concern about health impacts near schools and did not address it in the assessment
- The applicant's own abnormal load scheduling (Chapter 3, p.119; Chapter 10, p.226) acknowledges school traffic as a factor requiring management without identifying or assessing our school specifically

If An Coimisiún Pleanála is nonetheless minded to consider permission, we ask that no determination issue unless and until the following specific assessments have been carried out, published for public inspection, and found to be acceptable:

Air Quality

- A site-specific AERMOD air dispersion modelling receptor placed at Presentation College Athenry, with results demonstrating compliance with EU and national air quality standards at our school boundary under all operational scenarios including plant start-up, steady-state operation, and shut-down cycles.
- A specific human health assessment for our student population addressing the elevated pollutant uptake of adolescents engaged in vigorous outdoor physical activity, using activity-appropriate ventilation rate assumptions and age-appropriate health effect benchmarks consistent with WHO Air Quality Guidelines (2021) and the European Environment Agency guidance on children's health and air pollution cited in EIAR footnote 54.
- An assessment of cumulative long-term NO_x and PM_{2.5} exposure for students who will attend the school for five or six years during the operational lifetime of the plant.

Noise

- A site-specific noise assessment at Presentation College Athenry, using EPA Guidance Note NG4 methodology, covering construction phase and operational phase noise, including evening operation during peak demand dispatch cycles.
- A demonstration that operational noise levels at our school will not exceed values appropriate for an educational establishment in a low background noise environment.

Traffic and Road Safety

- A specific assessment of the interaction between construction HGV and abnormal load traffic and school-related traffic — including school buses, student cars, and parent drop-off vehicles — on shared road sections in the vicinity of Athenry.
- Identification of school bus routes serving Presentation College Athenry and assessment of potential conflicts with HGV routing at proposed construction traffic volumes.
- A revised and specific abnormal load scheduling commitment that explicitly accounts for the opening hours, arrival patterns, and departure patterns of Presentation College Athenry, with enforceable conditions ensuring no abnormal loads move on roads in the vicinity of the school during school arrival and departure windows.

Major Accident

- A specific major accident consequence assessment addressing the presence of Presentation College Athenry (1,081 students) approximately 2.5 km from the site, including emergency response procedures, public information arrangements, and shelter-in-place or evacuation protocols appropriate to a school population of this size.

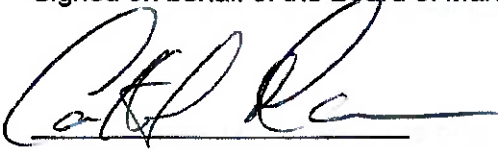
Engagement

- A formal written explanation from the applicant of why Presentation College Athenry was not identified as a sensitive receptor, not included in the air quality model, not included in the noise sensitive location list, and not consulted during the pre-application process, together

with a commitment to direct engagement with our Board of Management before any revised assessment is submitted

Presentation College Athery has educated the young people of this community for over 115 years. Our 1,081 students come to this school to learn, to develop, to compete, and to grow. The applicant's own EIAR identified them as visual receptors in a landscape chapter while omitting them entirely from every health, air quality, and noise assessment in the document. The applicant's own consultation record shows it was told about school health concerns and did not act on them. The applicant's own scheduling documents acknowledge school traffic as a factor requiring management without ever engaging with us. We were invisible in this process. Our students deserve better than that. This application should not be granted on the basis of an environmental assessment that did not assess the impact on one of the largest schools in the catchment area.

Signed on behalf of the Board of Management:



Mr. Cathal Moore

Principal / Secretary Board of Management



Deadline for submissions: 5:00 PM Friday 24 April 2026 — Planning Application PA07.324113, An Coimisiún Pleanála