



Lisheenkyle N.S.,
Oranmore,
Co. Galway
H91 YR20
25th May 2026

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

RE: FORMAL OBJECTION TO PLANNING APPLICATION VA07.324162

SID: 220kV Underground Grid Connection and Substation, Cashla to Athenry Gas Peaker Plant, Co. Galway

Applicant: Bord Gáis Energy Limited

Submitted by: Jennifer McDonnell, Principal, on behalf 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 our roll in the school from Junior Infants through to sixth class. A morning club at the school opens at 8 a.m. and an afterschool operates until 5 p.m. daily. There is a pre-school on site and after school activities and summer camps operate during school closure periods. Our school is open and busy with children for far more of the day than the standard school hours suggest.

We are writing because the proposed 220kV underground grid connection will run along the L-7108 and L-7109 roads — the roads immediately beside our school, the roads our children walk and cycle along to get to school, the roads our school bus travels. The cable route passes within 0.55 kilometres of our front gate. The L-7108 is proposed to be fully closed for up to five months of construction and resurfacing activity, with no clear school-term avoidance commitment

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identified. We are writing because, having read the applicant's Environmental Impact Assessment Report (EIAR), we have found that our school was named as the closest school to the development and then omitted from the noise assessment, omitted from the construction traffic impact assessment, and excluded from meaningful consultation.

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, the only one at any school in the Republic of Ireland. We have an eco-school garden where every child tends their own plants. We have Seomra na Coille — an outdoor woodland classroom in Derrydonnell Wood directly behind our school, where children come every season to learn about nature, biodiversity, and the living environment around them.

These are not achievements we list out of pride alone. They are the educational identity of this school. They tell you what kind of place this is and what we stand for. They also tell you exactly what is at risk if this development proceeds without a proper assessment of its impact on our children, our school access, and our community.

The Board respectfully submits that these educational, environmental and active-travel initiatives form part of the established educational and community environment of the school and should have been specifically considered within the assessment of likely construction, traffic and community impacts affecting the receiving environment.

1.1 Our School Day and Our Children's Hours on Site

The grid connection construction programme will overlap directly with school term.

The proposed grid connection construction programme runs for nine months. None of this has been assessed in the context of our school day or our children's safety.

1.2 Where We Are Relative to the Proposed Grid Connection

The Construction Grid Connection Report (Volume 3, Appendix 2.7) confirms the route:

The UGC route commences at the Cashla 220kV substation and travels south along the L-7109 road for approximately 840 metres through Lisheenkyle. It then turns right



onto the L-71093 road and continues south for approximately 500 metres before crossing the M6 motorway via horizontal directional drilling (HDD). (*Construction Grid Connection Report, Section 1, Table 2, Ch. 0m–1600m*)

The cable route then runs along the L-7108 — Lisheenkyle East Road — the road immediately beside our school. This is the road our walking and cycling children use. This is the road that will be fully closed for up to five months during construction. The applicant's own report states:

“Due to limited road width along Lisheenkyle East (L7108) and L7109 roads, full road closures will be required.” (*EIAR Volume 2, Chapter 2, p.108*)

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

Our school is located approximately 0.55 km from the cable route at its closest point. The L-7108 and L-7109 roads form the complete journey to our school for the majority of our pupils and their families. Both will be directly affected by this development during construction.

The Board of Management further notes that the proposed underground grid connection forms part of the wider integrated Cashla Peaker Project associated with ACP Ref. 324113. The cumulative interaction between the proposed peaker plant, associated substation infrastructure and the proposed underground cable corridor has particular relevance for the school community, given that the L-3103 corridor forms part of the school access route for families, staff and school transport travelling to and from Athenry toward Lisheenkyle National School.

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 grid connection route. It then excludes our school from its construction noise assessment, its road safety assessment, and its community impact assessment. The Board respectfully submits that identifying Lisheenkyle National School as the closest educational receptor to the development, while simultaneously excluding the school from the construction noise model, school-access assessment and child-safety analysis, represents a material inconsistency within the EIAR assessment methodology.

We set out the evidence for this below, drawn entirely from the applicant's own documents:

Finding 1: The EIAR confirms our school as the closest educational establishment, located 0.6 km from the cable route and 2.8 km from the main peaker plant site.



Finding 2: The Construction Grid Connection Report (Volume 3, Appendix 2.7, Table 2) confirms that the cable route runs along the L-7108 and L-7109 roads, approximately 550m from our school.

Finding 3: The EIAR (Volume 2, Chapter 9, Table 9-11, p.453) lists five Noise Sensitive Locations (NSLs) in the noise model — all residential properties (R01 to R05). No educational establishment is listed. Our school is absent from the noise assessment.

Finding 4: The EIAR (Volume 2, p.282) confirms construction noise from cable trenching at 87 dB at 10 metres from the works. This is comparable to a pneumatic drill or heavy lorry engine at close range. No assessment was made of this noise level at our school from the route.

Finding 5: The EIAR (Volume 2, Chapter 2, Table 2-4, p.107-108) confirms the L-7108 will be fully closed for three months during cable installation, plus a further two months of resurfacing — a total of five months. No specific assessment of school access or child safety during this closure was conducted.

Finding 6: The EIAR (Volume 2, Chapter 4, Table 4-17, p.203) identifies children and adolescents as having ‘high sensitivity to noise’ (citing EEA footnote 55). It then applies this finding to no educational establishment in the noise model.

Finding 7: The Construction Grid Connection Report (Volume 3, Appendix 2.7, p.10) confirms Joint Bay 02 (JB-02) will be located on the L-7109 road at Chainage 760m, and Joint Bay 05 (JB-05) will be located at Chainage 1520m after the M6 HDD crossing — both within Lisheenkyle. Each joint bay is an 8m x 2.5m x 2.05m concrete structure installed below ground. No assessment of the impact of these works on school access or traffic was conducted.

3. Construction Noise 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 does not appear. EPA Guidance Note NG4 explicitly defines educational establishments as noise sensitive locations. Our school was omitted from the noise assessment by definition in a manner that appears inconsistent with the applicable guidance.

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

“The indicative total construction noise for the UGC route was calculated as 87 dB at 10 metres from the works.”

Cable laying on the L-7108 and L-7109 roads will proceed at 30 to 50 metres per day. These roads run close 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. It is intense, disruptive noise that will continue for months during school term.

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 evidence, 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 on the L-7108 and L-7109 roads within 0.55 km of our school, at 87 dB at 10m source level, warrants specific assessment at our school. None was conducted.

No assessment appears to have been undertaken regarding the wider environmental effects associated with prolonged trench excavation, heavy tracked plant movement, road compaction and intermittent rock-breaking activity along the surrounding road network, including potential implications for outdoor educational activity, preschool occupancy, concentration, child wellbeing and the general educational environment during prolonged construction activity.

The Board respectfully submits that educational establishments are not ordinary receptors within the receiving environment. Primary schools contain young children who are uniquely sensitive to prolonged environmental disturbance, traffic risk and disruption to learning environments, and therefore warrant specific and precautionary assessment within any construction-phase EIAR.

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

4.1 The Roads Our Families and School Bus Use

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

Many families from Athenry town drive this route for morning drop-off and afternoon collection. The L-3103 runs directly past the proposed peaker plant access gate (though this is part of a separate application). The L-7108 — Lisheenkyle East Road — runs directly to 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 L-7108 and L-7109. Families from Athenry town and other areas arrive entering on the L-3103 before



turning onto the L-7108. These two roads together form the complete journey to our school for the majority of our school community. Both will be directly affected by this grid connection during construction.

4.2 The L-7108 Road — Five Months of Full Road Closure During School Term

The L-7108, Lisheenkyle East Road, is the road our walking and cycling children use. 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).

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. It will now 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 L-7108 and L-7109 during active cable laying works would leave a walking child with no safe space. This is not a theoretical risk. It is the daily reality of a child who lives in Lisheenkyle and walks or cycles to school.

The Board of Management respectfully submits that the proposed construction arrangements are inconsistent with the principles of child-centred road safety, active travel and safe access to educational facilities promoted within the National Planning Framework, the Design Manual for Urban Roads and Streets (DMURS), Safe Routes to School initiatives and wider national school transport safety policy.

The Board respectfully submits that the proposed construction arrangements are also inconsistent with national policy objectives encouraging active school travel, walking and cycling to school, particularly where no safe alternative pedestrian route has been identified for affected children during prolonged road occupation works.

The Board of Management further notes that, within the Apple strategic development planning process affecting the wider Athenry area, restrictions were previously imposed preventing construction-related heavy goods vehicle traffic from using the L-7108 corridor, reflecting the

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constrained nature and sensitivity of the local road environment. The Board respectfully submits that this further demonstrates the exceptional sensitivity of the L-7108 corridor in the context of prolonged construction occupation associated with the proposed development.

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.

4.3 Diversion Routes During L-7108 Closure

The EIAR (Volume 2, Chapter 2, Table 2-4, p.107) confirms that Lisheenkyle East Road (L-7108) and L-7109 will be fully closed to through traffic for three months during cable installation, 2 months for L-7109, followed by a further two months of resurfacing of L-7108 and on and a half months for L-7109 — a total of up to nine months. During this period, the road that our walking and cycling children use to get to school will be a construction site.

The proposed diversion route for L-7108 closure is via L-7109 to R339 to L-3103 — adding approximately 5 km of extra travel (EIAR Volume 2, p.108). For a family who lives on the L-7108 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. It then treats this as a minor, temporary inconvenience.

The grid connection construction programme will overlap directly with school term. No assessment has been made of how our school community will safely access the school during this period.

No assessment has additionally been provided regarding emergency vehicle access to the school during periods of full road closure, active trenching or traffic diversion affecting the L-7108 and L-7109 corridors.

5. Construction Duration, Timing, and School Term

The Construction Grid Connection Report (Volume 3, Appendix 2.7, Table 2-4) confirms the following construction programme:

- Total grid connection construction: 9 months
- Cable installation on L-7108: 3 months, L-7109: 2 months,
- Road resurfacing on L-7108: 2 months, L-7109: 1.5 months
- Total L-7108 disruption: 5 months, Total L-7109 disruption: 3.5 months
- Construction hours: 7:00 a.m. to 7:00 p.m., Monday to Friday (6:00 a.m. start for HDD works)

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Our school term runs from September to June. Construction hours of 7:00 a.m. to 7:00 p.m. overlap directly with our school day and afterschool activities. The noise, traffic, and road closures will affect our children during their learning hours, not just outside them.

The EIAR does not specify when during the year the L-7108 or L-7109 works will take place. If they occur during school term — which appears likely given the nine-month total programme — our children will face combines eight and a half months of construction noise, closed roads, diverted traffic, and disrupted access to school. No mitigation has been proposed. No school-specific construction timing has been assessed.

6. 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 220kV Underground Grid Connection, Planning Reference VA07.324162.

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.

6.1 Summary of EIAR Failures in Relation to Our School

- The EIAR names us as the closest school (0.55 km from cable route) but places no noise receptor at our school and draws no construction noise conclusions for our children.
- The noise model contains only five residential NSLs. Our school is not among them (EIAR Volume 2, Table 9-11, p.453). This appears inconsistent with EPA Guidance Note NG4 which defines educational establishments as NSLs.
- The EIAR cites EEA evidence on children's high sensitivity to noise (Table 4-17, p.203, footnote 55) but applies this to no educational establishment in the noise model.
- The L-7108, and L-7109 — our walking and cycling children's roads — will be fully closed for up to nine months of construction activity. No child safety assessment for these roads during works was conducted.
- The EIAR confirms construction noise at 87 dB at 10m from cable trenching works (comparable to a pneumatic drill) but does not assess this noise level at our school 500m from the route.
- The proposed diversion route during L-7108 closure adds 5 km of extra travel. No safe walking or cycling alternative for our school children has been identified or assessed.



- **Construction hours (7:00 a.m. to 7:00 p.m.) overlap directly with our school day. No assessment of construction noise impact during classroom learning hours was conducted.**
- **The applicant's own consultation record confirms school health was a frequently raised public concern. Our school was contacted only to be asked to send an email about a public meeting.**

Insufficient assessment has also been undertaken regarding the potential implications of prolonged infrastructure occupation, underground utility concentration and associated traffic management measures for the future operation, expansion and development needs of the school campus and associated educational facilities.

6.2 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:

Construction Noise

- A specific noise assessment at Lisheenkyle National School must be carried out, using EPA NG4 methodology, for the construction phase — particularly during active cable trenching on the L-7108 and L-7109 roads within 0.55 km of the school
- The assessment must demonstrate compliance with WHO Environmental Noise Guideline values for educational environments (35 dB LAeq) in our classrooms during all cable installation and resurfacing works
- If compliance cannot be demonstrated, specific mitigation measures must be proposed — including potential rescheduling of the noisiest works to school holiday periods

Road Safety and School Access

- A specific road safety assessment must be conducted for the L-7108 and L-7109 during the full closure period, addressing the safety of children who walk and cycle to school on these roads, and identifying safe alternative arrangements for these children during the nine months of construction activity
- A dedicated school community access plan must be prepared for the L-7108 and L-7109 closure period, in direct consultation with our school, identifying safe walking, cycling, and vehicle drop-off arrangements for our pupils and their families
- The construction programme must specify when during the year the road works will take place, and must demonstrate how school access will be maintained safely throughout this period
- If the road works will take place during school term, specific mitigation measures must be proposed — including potential temporary pedestrian walkways, traffic marshals



during school drop-off and collection times, and advance notification to all school families

Consultation

- Direct written engagement with our Board of Management must take place before any revised assessment is submitted, including a site visit to understand the local road conditions and school access arrangements

We are asking An Coimisiún Pleanála to refuse permission where the applicant has failed to assess impacts on the closest school to the proposed infrastructure. The children of Lisheenkyle National School must be protected before any determination can lawfully be made.

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.

Yours faithfully,

Jennifer McDonnell

Secretary Board of Management of Lisheenkyle National School

25th May 2026

Elaine Mulry

Board of Management

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Location of Lisheenkyle National school to the proposed development of the grid cable route

