



Lisheenkyle Pre-School and After school
Lisheenkyle, Oranmore, Co. Galway H91YR20

25th May 2026

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

FORMAL OBSERVATION TO PLANNING APPLICATION

Case Reference; VA07.324162

RE: Observation to the proposed development of a 220kV substation, telecommunications mast and underground electricity cable infrastructure with associated works.

Location: Rathmorrissey, Pollnagroagh, Moanbaun, Castlet Lambert, Knocknacreeva, Caraunduff, Caherbriskaun, Lisheenkyle East, Barrettspark and Cashla (Townlands), Athenry, Co. Galway.

Applicant: Bord Gáis Energy Limited

Dear Members of An Coimisiún Pleanála,

I am writing on behalf of Lisheenkyle preschool and after school, which operates within the Lisheenkyle National School campus. Our Preschool forms part of the wider educational environment serving children and families within the Lisheenkyle community. Our school is located 550m from the proposed cable connection.

As a preschool and after school serving children aged 4 – 12 years old, approximately 50 children weekly and are therefore among the most environmentally sensitive members of the receiving environment in terms of noise exposure, traffic

risk, disruption to routine and construction-related disturbance. We have a duty of care to protect the health, safety, and wellbeing of the pupils entrusted to us.

I am deeply concerned about the risks this proposed development poses to children in our school and the wider Athenry community.

The proposed 220kV underground grid connection associated with Planning Application VA07.324162 will run along the L-7108 and L-7109 roads linked to the school campus and preschool environment. The proposed cable route passes within approximately 0.55 kilometres of the school grounds, while the L-7108 road to the school is proposed to be fully closed for up to five months during construction and resurfacing works.

The roads surrounding Lisheenkyle Preschool are already heavily used by local traffic, school transport and agricultural vehicles. These roads are narrow, have restricted visibility and lack proper public hard shoulders. The only widened sections are private parking bays located outside newer houses, which remain the responsibility of homeowners and are not intended for pedestrian use or roadside safety. The introduction of heavy construction traffic, HGVs and stop/go traffic systems would significantly increase congestion and road safety risks for schoolchildren, residents and all road users.

Having reviewed the applicant's Environmental Impact Assessment Report (EIAR), we are concerned that the preschool environment and the particular vulnerability of very young children do not appear to have been specifically assessed within the construction noise, traffic, child-safety or community impact assessments.

In particular, we note the following concerns arising from the applicant's own documentation:

- the EIAR identifies Lisheenkyle National School as the closest educational establishment to the proposed development, yet no educational receptor appears within the construction noise model;
- the EIAR confirms indicative construction noise levels of approximately 87 dB at 10 metres from underground cable trenching works;
- the proposed construction programme involves prolonged trench excavation, road opening, resurfacing works and associated construction traffic activity along the L-7108 and L-7109 roads;
- the L-7108 and L-7109 roads are proposed to be fully closed for prolonged periods due to limited road width and constrained road conditions;
- no specific preschool or early-years childcare assessment appears to have been undertaken regarding construction noise, vibration, road safety, traffic management or impacts on the educational environment;

- and no evidence has been provided of direct consultation with the preschool regarding the likely effects of prolonged construction activity adjacent to the school environment.

I respectfully submit that preschool children are uniquely sensitive receptors within the receiving environment. Children attending early-years educational facilities require stable, safe and low-disturbance environments in order to support learning, communication, wellbeing and emotional regulation. The proposed construction programme, road closures, trench excavation works and associated construction traffic would overlap directly with preschool operational hours and daily child drop-off and collection activity.

The preschool operates within the wider Lisheenkyle National School campus environment, which includes active-travel initiatives, outdoor educational activity and shared access arrangements used daily by children, parents and staff. I respectfully submit that the likely effects of prolonged construction activity on this integrated educational environment do not appear to have been comprehensively assessed within the EIAR.

Particular concern also arises regarding:

- the unique vulnerability of preschool children as the youngest and most environmentally sensitive receptors within the receiving environment;
- the safety implications associated with construction activity and traffic management on constrained rural roads surrounding the school campus;
- the absence of safe pedestrian infrastructure for children and families accessing the preschool;
- the potential impact of prolonged construction noise and intermittent vibration on indoor learning environments and outdoor play activities;
- the cumulative interaction between the proposed underground grid connection works and the wider Cashla Peaker Project associated with ACP Ref. 324113;
- the implications of prolonged road closures and traffic diversions affecting daily preschool access arrangements;
- and the absence of any apparent preschool-specific mitigation strategy within the EIAR documentation.

Public Consultation and Engagement

I would also respectfully submit that meaningful consultation with the preschool environment does not appear to have occurred prior to submission of the application.

No evidence has been provided demonstrating that the applicant consulted specifically with the preschool regarding the likely effects of prolonged construction activity on very young children, construction noise and disturbance during preschool operational hours, child safety implications associated with road closures, trench excavation and construction traffic, or the practical implications for daily preschool access, drop-off and collection arrangements. The circulation of general public meeting information cannot reasonably substitute for meaningful engagement with an early-years facility caring for highly sensitive children.

The Aarhus Convention and the Environmental Impact Assessment Directive require effective public participation and informed engagement with affected communities. In circumstances where a preschool facility located within the Lisheenkyle National School campus forms part of the immediate receiving environment of prolonged infrastructure construction works, the Board respectfully submits that direct and meaningful engagement with the preschool community should reasonably have formed part of the consultation process.

The absence of preschool-specific consultation further reinforces concerns regarding whether the likely effects on young children and the early-years educational environment were adequately identified, assessed or mitigated within the EIAR process.

Accordingly, I respectfully request that An Coimisiún Pleanála require:

- a specific assessment of likely construction noise, vibration and traffic impacts affecting the preschool environment;
- a child-safety and school-access assessment addressing the implications of prolonged road occupation and traffic diversion works surrounding the school campus;
- direct consultation with the preschool and wider school community regarding construction timing, mitigation measures and safe access arrangements;
- a clear demonstration that the health, safety and wellbeing of preschool children have been comprehensively assessed prior to any determination on the application;
- and appropriate mitigation measures, including consideration of construction timing during school holiday periods where feasible.

I would respectfully submit that the current EIAR documentation does not adequately assess the likely significant effects of the proposed development on the preschool environment or the particularly sensitive young children attending the facility.

We thank An Coimisiún Pleanála for considering this submission.

Yours faithfully,

Abbie Harris _____

Abbie Harris
Lisheenkyle Preschool and After school