

Creva International

KnocknaCreva
Athenry, Galway Ireland.
H65 AW24



16th April 2026

An Coimisiún Pleanála

Strategic Infrastructure Division
64 Marlborough Street
Dublin 1, D01 V902

Re: Formal Objection —to the proposed development of an Open- cycle gas turbine and generator, located in the townlands of Pollnagroagh and Rathmorrissy, Athenry, Co. Galway. Cashla Peaker Plant.

Planning Reference: PA07.324113

Applicant: **Bord Gáis Energy Ltd**

1. Introduction and Identity of Objector

This formal objection is submitted by Creva International, a B2B agribusiness headquartered in Athenry, Co. Galway. Creva International was founded in 2012 and operates from commercial premises located approximately 700 metres from the proposed Cashla Peaker Plant site. The company employs a team of staff at its Athenry offices and is currently in an active phase of business expansion, having obtained commercial planning permission (Ref 2560880) and invested in extending its office facilities.



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We object in the strongest possible terms to the grant of planning permission for the proposed 334 MW Open Cycle Gas Turbine (OCGT) Peaker Plant at Cashla. This objection is grounded in direct and material commercial impact, and is supported by reference to serious deficiencies identified in the applicant's own planning documentation.

2. Proximity and Direct Commercial Impact

Creva International's offices are located approximately 700 metres from the proposed Cashla Peaker Plant site. This is not a peripheral concern. The proposed plant will be directly and prominently visible from our premises and will fundamentally alter the working environment we have invested in and built our business around.

2.1 Impact on Staff Recruitment and Retention

Attracting and retaining skilled employees to a rural County Galway location is already one of the most significant operational challenges we face as a growing business. Staff are asked to commute to Athenry from across the region. The prospect of working 700 metres from a heavily industrialised COMAH-classified facility — with its associated visual impact, diesel storage risk, mandatory testing emissions, and potential for major accident scenarios — materially undermines our ability to present Athenry as an attractive place to work.

We have recently extended our offices and are planning further investment in our premises and team. We are concerned that this planning permission, if granted, will directly compromise our ability to recruit the calibre of people we need to grow. This is not a hypothetical risk. It is a concrete commercial consequence of siting a major hazard establishment 700 metres from an existing commercial business.

2.2 Impact on Business Investment

Creva International holds full commercial planning permission at its current premises and has made significant capital investment in its facilities. The value and utility of that investment is directly threatened by the proposed development. A COMAH lower-tier establishment of this scale — storing 5,470 to 6,003 tonnes of diesel fuel — within 700 metres of our offices represents an ongoing risk to our business operations, our staff, and our clients who visit our premises.

We have committed to growing our business from Athenry. That commitment was made on the basis of the existing commercial and rural character of the area. The proposed Peaker Plant fundamentally changes that character.

2.3 Access, Road Infrastructure and L3103

Our staff, visitors and delivery vehicles use the local road network — including the L3103 — to access our premises. The planning application confirms that construction of the proposed plant will involve the delivery of extraordinary abnormal loads, including a 360-tonne gas turbine, a 380-tonne generator, and a 288-tonne transformer, through the Athenry area and along routes approaching the site. The structural impact of these loads on rural roads and bridges in our immediate vicinity has not been adequately assessed.

Table 1-4 - 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

Additionally, the applicant's own NIS (Table 1-4) shown above, confirms full road closures on the L7108 (Castlelambert to Lisheenkyle) for up to five months during construction, with an 8km diversion adding 5km to each journey. Staff, clients, and service vehicles accessing our premises will be materially affected by this disruption for an extended period. No adequate mitigation for this impact on existing businesses has been proposed.

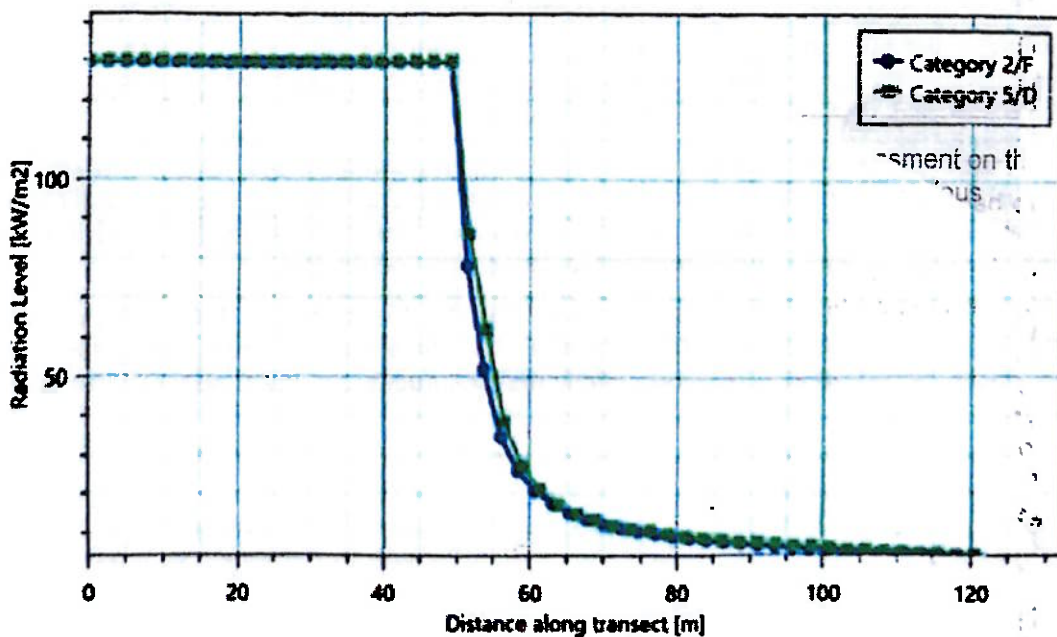
3. COMAH Classification — A Major Hazard 700 Metres from Our Offices

The proposed development triggers classification as a COMAH lower-tier establishment by virtue of the diesel storage quantity: 5,470 to 6,003 tonnes of diesel fuel, well in excess of the 2,500-tonne COMAH lower-tier threshold. This is not a routine commercial facility. It is a designated major hazard site under the Seveso III Directive.

The applicant's own COMAH Report contains a fundamental and irreconcilable contradiction that we ask An Coimisiún Plánála to treat as a determinative ground for refusal. The Report simultaneously:

- Dismisses the Major Accidents to the Environment (MATTE) assessment on the basis that secondary containment bunding is adequate and that hazardous substances cannot credibly reach Natura 2000 sites; and
- Models, at Appendix B, Figure B-120, the scenario 'Tank Rupture (Inner AND Outer Shell), Bund Overtopping, Pool Fire Off Site to East' — a 1,667.5 m³ diesel pool fire extending approximately 120 metres beyond the site boundary.

These two positions cannot both be true. If bund overtopping is not credible, Figure B-120 should not exist. If Figure B-120 is a genuine modelled scenario — which it plainly is — then the MATTE dismissal is false. This is not a technical footnote. It is a material failure in the safety case upon which planning permission is sought. As a business located 700 metres from this proposed establishment, we have a direct and legitimate interest in the integrity of that safety case.



4. Diesel Burning — Emissions, Inadequate Assessment, and Platin Precedent

Section 1.5.1.1.5 of the applicant's NIS discloses that diesel burning will occur for up to 18 hours per annum under mandatory EirGrid Grid Code testing. However, this figure is a **statutory minimum only**. The application documents do not adequately characterise:

- Unplanned diesel operation during gas supply interruptions, which the plant is designed and intended to manage;
- Start-up diesel consumption across the expected number of annual start/stop cycles;
- Commissioning-phase diesel consumption during contractual performance and grid code compliance tests;
- The true design-basis diesel operating profile, given that 6,000 tonnes of stored fuel is wholly disproportionate to 18 hours of annual testing.

Diesel combustion in a 334 MW OCGT generates substantially higher NO_x, SO₂, particulate matter, and black carbon per unit of energy than natural gas. These emissions will disperse eastward toward Athenry under prevailing westerly conditions. Our staff, clients and the wider workforce of the Athenry area will be downwind of these emissions. No separate quantified assessment of diesel-firing emissions at commercial or residential receptors in our vicinity has been provided.

We further draw An Coimisiún Plánála's attention to the directly applicable Irish planning precedent: An Bord Plánála refused planning permission for SSE's proposed 208 MW OCGT peaker plant at Platin, Co. Meath, in a 5–3 majority decision, specifically because the plant would burn distillate oil/diesel as backup fuel. The Board's own inspector described that choice as 'misplaced' and approval as 'irresponsible' and contrary to national policy. The revised Platin proposal was only approved after the applicant committed to Hydrotreated Vegetable Oil (HVO) biofuel and a hydrogen conversion pathway. The Cashla application makes no such provision: there is no HVO option, no hydrogen-ready design, and no decarbonisation roadmap. The same refusal must follow.

5. Visual Amenity and Business Environment

The proposed Cashla Peaker Plant will be a large-scale industrial installation — permanently and prominently visible from our offices, from the roads our staff travel daily, and from the agricultural and commercial landscape that characterises this part of County Galway.

The facility will include a gas turbine building, a generator hall, diesel storage tanks, a 220 kV substation, cooling systems, and security lighting. It will be operational, lit, and audible around the clock during periods of peak grid demand.

This is not the environment in which a growing professional business, seeking to attract talented people to a rural location, should have to operate. The visual and amenity impact of this development on our business and on the wider commercial character of the Athenry area has not been adequately assessed in the application documents.

The applicant's own photomontage network confirms this: Viewpoint 05 (VP05, LVIA Vol. 3, Appendix 6.1) is the closest verified viewpoint to our office and was photographed in late April under near-optimal screening conditions, with deciduous trees beginning to come into leaf.



VP05 Year 1 Proposed — applicant's own photomontage, LVIA Vol. 3, Appendix 6.1. Photographed late April 2025 from the viewpoint closest to Creva International.

Notwithstanding these favourable conditions, VP05 demonstrates that the following elements of the proposed development will be clearly and prominently visible from the Knocknacreeva/H65 AW24 locality:

- A large cylindrical diesel fuel storage tank (one of two holding approximately 5,470 tonnes / 6.2 million litres of diesel), visible in solid form above the boundary dry stone wall with no intervening screening.
- A tall exhaust stack, projecting prominently above the existing vegetation line against the open sky.
- The engine hall / main building roofline, a large industrial structure spanning a significant width of the view.
- ESB 220kV substation gantry lattice towers, visible on the far right of the frame, confirming the wide lateral extent of the development.
- The red line overlay in VP05 extends across the full width of the photograph from left to right — this is not a localised impact but a complete replacement of the rural agricultural skyline with industrial infrastructure.

Critically, the foreground of VP05 shows open agricultural pasture bounded by a low dry stone wall. There is no hedgerow, no tree belt and no landform in the direct line of sight between the camera position and the site.

VP05 represents the best-case screening scenario. The photograph was taken in late April with deciduous vegetation at near-maximum leaf cover. In winter and early spring — the seasons during which a peaker plant is most likely to be called into operation in response to peak electricity demand — all deciduous trees visible in VP05 will be leafless. Visibility of the proposed development from H65 AW24 in operational conditions will be materially greater than VP05 already demonstrates.

The structures most prominently visible in VP05 — the exhaust stack and substation gantry lattice — will not be screened by any proposed mitigation planting at any stage of the development. These elements exceed the height of any realistic native hedgerow or tree screen. Year 1 and Year 15 photomontages at comparable viewpoints show near-identical visibility of the taller elements, confirming that mitigation planting does not resolve the visual impact on receptors at this distance. The visual impact on Creva International will therefore persist for the full operational lifetime of the development.



VP05: applicant's own image, LVIA part 1, Appendix 6.1. Photographed February 2025 from the viewpoint closest to Creva international.

No night-time visualisation has been provided for VP05 or for any viewpoint. The proposed development includes perimeter floodlighting columns up to 20 metres in height, operational lighting and security lighting (LVIA, Vol. 3, Appendix 6.1; EIAR ecological chapter). The knocknacreva area has very low baseline artificial light levels. The applicant's own EIAR acknowledges that lighting from the development will, without mitigation, cause permanent significant adverse impact on local bat populations through disturbance to commuting and foraging behaviour — confirming that light from the site will extend materially beyond the site boundary and across the landscape in the direction of our office. The absence of a night-time visual impact assessment for this locality is a material omission.

The Galway County Development Plan 2022–2028 seeks to protect the intrinsic character and visual quality of the rural landscape and to avoid development that would result in significant adverse impacts on landscape character or visual amenity in open or sensitive rural areas. The proposed development, as demonstrated by the applicant's own VP05 photomontage, introduces a large-scale industrial complex with prominent fuel storage tanks, an exhaust stack, engine hall and high-voltage substation gantry into a completely open agricultural landscape with no existing screening from our office. This constitutes a significant and unmitigable adverse impact on the visual amenity of this business premises and is in conflict with the policies of the Development Plan.

6. Climate Policy — A 334 MW Fossil Gas Plant Until 2050

Section 1.6.2 of the NIS confirms the plant will operate until 31 December 2050. This is 24 years of fossil gas and diesel combustion. The Climate Action and Low Carbon Development (Amendment) Act 2021 imposes legally binding obligations on the State: a 51% reduction in emissions by 2030 and net-zero by 2050. The Supreme Court confirmed in February 2026 that planning authorities must factor these obligations into planning decisions. A 334 MW OCGT operating to 2050 is directly contrary to both the Act and the Climate Action Plan 2024.

As a business that takes its environmental responsibilities seriously and operates in an agri-food landscape, we do not accept that a fossil fuel installation of this scale and duration is compatible with the planning framework that applies to this site and this community.

7. Conclusion and Request

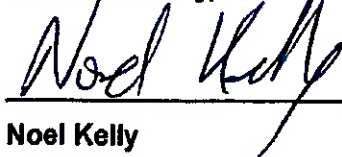
Creva International respectfully but firmly requests that An Coimisiún Pleanála refuse planning permission for the proposed Cashla Peaker Plant on the following grounds:

- The proposed development is located approximately 700 metres from our commercial premises and will directly and materially harm our ability to recruit staff, retain employees, and invest in our business in Athenry;
- The applicant's COMAH Report contains irreconcilable internal contradictions regarding the MATTE assessment and off-site diesel pool fire scenarios that must be independently resolved by the HSA before any decision can be made;
- The diesel burning assessment is materially deficient and the application is directly analogous to the SSE Platin OCGT proposal refused by An Bord Pleanála — no principled basis exists for a different outcome here;
- The road closures and abnormal load deliveries will cause sustained disruption to access to our premises and to the wider local road network;
- The unacceptable visual amenity impact, and requests that any further assessment include: a photomontage taken specifically from our office viewpoint; winter leaf-off visualisations; and night-time visualisations under full operational lighting conditions.
- The development is contrary to the Climate Action and Low Carbon Development (Amendment) Act 2021 and the Climate Action Plan 2024, as confirmed by recent Supreme Court jurisprudence.

We also formally request that An Coimisiún Pleanála require the HSA to independently audit the COMAH consequence modelling, receptor inventory, and Expectation Value calculation before any determination is made.

We reserve the right to make further submissions and to be represented at any oral hearing convened by An Coimisiún Pleanála in connection with this application.

Yours sincerely,



Noel Kelly

CEO and Founder, Creva International

Athenry, Co. Galway

12th April 2026

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