
Creva International

KnocknaCreva
Athenry, Galway Ireland.
H65 AW24



The Global Agri-Business Connector

25th May 2026

An Coimisiún Pleanála

Strategic Infrastructure Division

64 Marlborough Street

Dublin 1, D01 V902

Re: Formal Objection - to the proposed development of a 220kV electrical substation and 8.1km underground grid connection route from the Cashla Peaker Plant site to the existing Cashla 220kV Substation, traversing the L7109, L7108 and L3103 roads, including 10 no. joint bays within the public road carriageway and 3 no. motorway crossings by horizontal directional drilling.

Planning Reference: **VA07.324162**

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 along the L7108 road, on which the grid connection proposes to use. 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.

We object in the strongest possible terms to the grant of planning permission for the proposed 220kV substation and 8.1km underground grid connection infrastructure. This objection is grounded in direct and material commercial impact to our business operations, staff welfare, and client access, and is supported by reference to serious deficiencies identified by Galway County Council and Transport Infrastructure Ireland in their statutory submissions on the linked application 324113.

2. Direct Commercial Impact - Road Access and Business Operations

Creva International's offices are located approximately 700 metres from the proposed Cashla Peaker Plant site. Our staff, clients, delivery vehicles, and service providers rely on the local road network — including the L3103, L7108 and L7109 — to access our premises daily. The proposed grid connection route runs directly along these roads for its entire 8.1km length. I am concerned about the long-term impact of permanent high-voltage infrastructure being

installed beside my property and within local rural roads serving our community. No direct engagement, compensation discussion or clear explanation of future maintenance and infrastructure impacts has been provided to affected residents and landowners along Castlelambert and Knocknacreva.

2.1 Construction Duration and Access Disruption

The applicant's own Construction Grid Connection Report (Vol 3, Appendix 2.7) confirms that the grid connection works are expected to take approximately 12 months. The proposed methodology involves:

- Trenching operations along 6,050 metres of public road
- Installation of 10 no. joint bays within the public road carriageway, each measuring 8.0m in length and 2.5m in width, extending 2m below road level
- Stop/Go traffic management systems where road widths allow a minimum 2.5m clearance
- Full road closures with diversions where 2.5m clearance cannot be maintained which is all of L7108 and L7109.
- 3 no. horizontal directional drilling (HDD) operations at motorway crossings, with launch and receptor pits requiring extended road occupation

For Creva International, up to 12 months of road disruption on the routes our staff use daily to access our offices represents a sustained and material impediment to normal business operations. Staff commute times will be extended by diversions. Client visits will be disrupted. Delivery schedules will be affected. This is not a short-term inconvenience — it is a year-long operational constraint imposed on an existing commercial business that has invested significantly in its Athenry location.

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.

2.2 Staff Recruitment, Retention and Morale

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. We have recently extended our offices and are planning further investment in our team. A year of sustained road disruption, Stop/Go delays, and diversion routes materially undermines our ability to present Athenry as an attractive place to work.

Staff morale is directly affected by commuting conditions. Extended journey times, unpredictable delays, and the cumulative frustration of daily traffic management interventions over 12 months will have a real and measurable impact on the working environment we have invested in building.

2.3 Business Investment and Future Planning

Creva International holds full commercial planning permission at its current premises and has made significant capital investment in its facilities. That investment was made on the basis of reliable road access and the existing commercial character of the area. The proposed grid connection infrastructure fundamentally disrupts that assumption for a 12-month period and establishes a precedent for major infrastructure interventions in the local road network.

We are actively planning further business expansion from our Athenry base. The uncertainty created by this application — both in terms of construction disruption and the precedent it sets for future infrastructure works — directly affects our investment decisions and our confidence in the long-term suitability of this location.

3. Galway County Council Submission — Joint Bay Sterilisation and Road Authority Objections

Galway County Council, as the statutory road authority, has made a detailed submission to An Coimisiún Pleanála on the existing linked planning application, 324113 for Cashla Peaker Plant. Their observations are directly relevant to our objection and raise fundamental concerns about the long-term impact of the proposed infrastructure on the public road network.

3.1 Joint Bay Sterilisation of Public Roadway

Galway County Council's submission (page 17) confirms that the 10 joint bays proposed for the grid connection works, each measuring 8.0m in length by 2.5m in width and extending 1.85m below road level, will *effectively sterilise* the public roadway. The Council states explicitly that this infrastructure would prevent them from carrying out essential future works, including drainage upgrades, installation or extension of Group Water Scheme mains, and the provision or alteration of house service connections.

This is not a minor technical observation. It is a statement by the statutory road authority that the proposed infrastructure will permanently prevent future essential public works in the road network that serves our offices and the wider local community.

Galway County Council has explicitly requested that joint slabs be relocated off the public road and positioned within lands under the applicant's control. The application documents do not demonstrate that no off-carriageway alternative is practical.

3.2 Inadequate Traffic and Transport Assessment

Galway County Council's submission (page 17) confirms that the applicant has not submitted a detailed Traffic and Transport Assessment in accordance with TII publications (PE-PDV-02045). The Council has explicitly requested that a comprehensive review of all current potential transport impacts relating to the development should be assessed, including generated trips to and from the site.

This is a material omission. Creva International, as a commercial business dependent on road access, has a direct interest in a proper assessment of transport impacts. The absence of such an assessment means that the cumulative effect of construction traffic, delivery routes, abnormal loads, and diversion patterns on businesses like ours has not been quantified or mitigated.

3.3 Absence of Road Safety Audit

Galway County Council's submission (page 17) notes the absence of a recommended Road Safety Audit Stage 1/2 to reflect the entire scheme, including new vehicular accesses onto the public road network and the significant scale of roadside interventions being proposed, in accordance with TII Road Safety Audit guidelines GE-STY-01024.

A Road Safety Audit is not an optional extra. It is a standard requirement for developments of this scale affecting the public road network. The road authority has identified its absence. This audit would assess the safety implications of the proposed works for all road users — including the staff, clients and service vehicles accessing Creva International's premises.

3.4 Traffic Management Plan Deficiencies

Galway County Council has explicitly requested (page 18) that the applicant revise the grid connection traffic management plan to reduce extensive time periods of proposed road closures and impact to the public road margins. The Council has recommended that grid connection works should consider cabling jointing works in strategic passing bay locations to enable traffic to continue routes during the construction phase and thus reduce impact on narrow local diversion routes.

This request acknowledges that the current traffic management proposals involve extensive time periods of proposed road closures and unacceptable impacts on narrow local diversion routes. These diversions will directly affect routes to our offices. Galway County Council's submission confirms that the current proposals are inadequate and require fundamental revision.

4. Transport Infrastructure Ireland Submission — National Road Network Impacts

Transport Infrastructure Ireland (TII), as the statutory authority for the national road network, has made a submission to An Coimisiún Pleanála on the existing linked planning application, 324113 for Cashla Peaker Plant. (dated 23 April 2026). TII's observations are directly relevant to the assessment of this application and raise concerns about compliance with national road policy and technical standards.

4.1 Interim Guidance on High Voltage Assets Under Public Roads

TII's submission (page 4) refers An Coimisiún Pleanála to Department of Transport Circular RW 07 of 2025 and the Interim Guidance to Road Authorities (placement of Medium or High Voltage electricity assets) and the associated update issued with Circular RW 05 of 2026. TII notes that these documents are issued pro tem until the development of any procedures for the planning, regulation, construction and management of Medium or High Voltage cables under public roads.

This acknowledgement by TII that the regulatory framework for high voltage cables under public roads is in an interim state and subject to further development creates material uncertainty about the long-term management and maintenance obligations associated with this infrastructure. As a business dependent on reliable road access, Creva International has

a direct interest in the adequacy of the regulatory framework governing infrastructure in the roads we use daily.

4.2 Compliance with TII Standards for Motorway Crossings

TII's submission confirms that any works to the national road network to facilitate the grid connection must comply with TII Publications and must be subject to Road Safety Audit as appropriate. The submission notes that prior to any development, necessary licences, approvals or agreements with the local road authorities shall be in place.

The application documents do not demonstrate that these approvals are in place or that the necessary agreements with road authorities have been concluded. This represents a material gap in the application.

4.3 HDD Operations Near Motorway Bridges — Structural Risk

The proposed grid connection route crosses the M6 motorway twice and the M17 motorway once using horizontal directional drilling (HDD). Galway County Council's submission (page 18) requires a detailed structural survey for any works where directional drilling is proposed in proximity to motorway bridges.

The application documents do not provide such a structural survey. HDD operations create subsurface voids and ground movement. The structural integrity of motorway bridges and associated infrastructure in the vicinity of HDD operations must be independently verified before permission can be granted.

For Creva International, the M6 and M17 motorways are critical transport corridors for our business. Any structural compromise to these roads or their bridges would have direct consequences for our operations and the wider regional economy.

5. Natural Habitats and Environmental Impact Along the Cable Route

The proposed 8.1km underground grid connection route traverses a predominantly rural landscape characterised by agricultural land, hedgerows, field boundaries, and areas of ecological sensitivity. The construction methodology involves open-cut trenching along 6,050 metres of public road and HDD operations at three motorway crossing points.

5.1 Habitat Fragmentation and Hedgerow Loss

The proposed works will require clearance of vegetation, hedgerows and field boundaries along the cable route to facilitate construction access, working widths, and HDD launch/receptor pits. The applicant's Construction Grid Connection Report (Vol 3, Appendix 2.7) confirms that trenching operations will require working widths and temporary stockpiling of excavated material.

For a business operating in the agri-food sector, Creva International has a direct commercial interest in the preservation of agricultural landscape character and the ecological infrastructure that supports it. Hedgerows provide habitat connectivity, support pollinator populations, and contribute to the rural character that underpins the agricultural economy of this area.

5.2 Watercourse Crossings and Drainage Impact

The proposed cable route will cross multiple watercourses, culverts and drainage features along its 8.1km length. The applicant's Construction Grid Connection Report acknowledges the need to manage culvert installations and dewatering operations during trenching works.

Galway County Council's submission (page 18) explicitly notes that ducting installations over culverts within the public road will not be permitted by Galway County Council. This restriction reflects the risk of compromising drainage infrastructure that serves agricultural lands and prevents flooding of roads and properties.

The application documents do not demonstrate how the cable route will avoid or adequately mitigate impacts on culverts and drainage systems. Any compromise to drainage infrastructure in this area will affect agricultural land, road safety, and existing commercial properties including Creva International's offices.

6. Cumulative Impact with the Cashla Peaker Plant Application (324113)

This grid connection application (324162) is inextricably linked to the Cashla Peaker Plant application (324113). The grid connection infrastructure exists solely to facilitate the peaker plant. The two applications must be assessed together, and the cumulative impact on Creva International and the wider community must be recognised.

6.1 Construction Phase Overlap

If both applications are approved, construction of the peaker plant and the grid connection will occur concurrently or in close succession. The peaker plant application (324113) involves 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 grid connection application (324162) involves up to 12 months of trenching, Stop/Go traffic management, road closures, and diversions on the same local road network. The confirmed closure period is an estimate but actual disruption could be significantly longer due to karst ground conditions, gas main safety works at Knocknacreeva, and the unpredictability of underground excavation. No diversion plan, no pedestrian or cycling alternative, and no emergency access assessment has been provided for 324162. The cumulative impact of both construction programmes on road access to Creva International and other businesses in the area has not been adequately assessed.

6.2 Long-Term Operational Impact

The peaker plant application proposes an operational life until 31 December 2050. The grid connection infrastructure is permanent national grid infrastructure that will remain in place indefinitely. The long-term presence of this infrastructure in the public road network creates ongoing maintenance obligations, future access restrictions, and a permanent constraint on Galway County Council's ability to carry out essential road and utilities works.

For Creva International, the cumulative effect of the peaker plant (with its visual impact, COMAH classification, and diesel storage) and the grid connection infrastructure (with its road sterilisation and access constraints) represents a fundamental alteration of the commercial environment in which we have invested and continue to operate.

7. Conclusion and Request

Creva International respectfully but firmly requests that An Coimisiún Pleanála refuse planning permission for the proposed 220kV substation and grid connection infrastructure on the following grounds:

- The proposed development will cause sustained and material disruption to road access to our commercial premises for a 12-month construction period, directly affecting our staff, clients, and business operations;
- Galway County Council, as statutory road authority, has identified that the proposed joint bays will effectively sterilise the public roadway and prevent essential future works including drainage upgrades and utilities installations;
- The application lacks a detailed Traffic and Transport Assessment in accordance with TII publications, as required by Galway County Council;
- No Road Safety Audit Stage 1/2 has been submitted, contrary to TII guidelines and as explicitly noted by Galway County Council;
- The traffic management plan involves extensive time periods of proposed road closures on narrow local roads serving our premises, as confirmed by Galway County Council's submission;
- No detailed structural survey has been provided for HDD operations in proximity to motorway bridges, as required by Galway County Council;
- The application does not demonstrate compliance with Department of Transport Circular RW 07 of 2025 and RW 05 of 2026 regarding placement of high voltage electricity assets under public roads;
- The cumulative impact of this grid connection infrastructure and the associated Cashla Peaker Plant (PA07.324113) on our business, on natural habitats along the cable route, and on the character of the local road network has not been adequately assessed.

We also request that An Coimisiún Pleanála require the applicant to address all observations raised by Galway County Council and Transport Infrastructure Ireland before any determination is made, and to demonstrate that the proposed infrastructure can be delivered without causing material harm to existing commercial businesses, agricultural operations, and the wider community served by the local road network.

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

Noel Kelly

CEO and Founder, Creva International

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