

Strategic Infrastructure Development Department,
An Coimisiún Pleanála
64 Marlborough Street,
Dublin 1,
D01 V902

RE: Knockraha Battery Energy Storage System (ACP-322861-25)

16th February 2026

Drumkee LCIS Ltd have appointed Rowan Engineering Consultants (Rowan) to prepare and submit the planning application to An Coimisiún Pleanála for approval for development at the townlands of Knockraha, Townland of Ballynanelagh, Co. Cork in accordance with Section 182A of the Planning and Development Act 2000, as amended,

The development will consist of a 10-year planning permission for the construction of a: 1 No. enclosed battery energy storage system compound on a total of c. 2-hectare site to include: up to 64 battery storage blocks on concrete support foundations including heating, ventilation and air conditioning units (HVAC units), and 32 Power Conversion Systems (PCS) contained within 16 twin skid units, 1 no. 110 kV AIS electrical substation building and 1 no. single-storey customer substation building, control and switch room, 33/110 kV transformer and 1 no. auxiliary transformers, construction compound, firewater reservoir, store room, welfare unit, dam along the northern boundary, a retention basin, soakage swale, and a diesel backup generator, on lands at Ballynanelagh, Knockraha., Co. Cork.

Works will include upgrading the access road and site entrance, associated electrical cabling and ducting, security gates, perimeter security fencing, CCTV system, landscaping works and all associated ancillary infrastructure. The site entrance and access road will be constructed or completed in accordance with the adjacent site's approved planning application (ABP-321518-24). Operational right of way for that facility will be maintained through construction and operation.

The proposed development will have a projected life span of 35 years. The proposed site will be used as a single purpose site as a BESS facility, supporting the decarbonisation of the electrical grid.

Pre-Application Consultation

As required, the project team applied for a pre-application consultation with the Strategic Infrastructure Development (SID) unit of An Coimisiún Pleanála (ACP). A Consultation meeting was held on the Tuesday 9th September 2025 at 11:00am.

Forensic & Environmental Engineering

Head Office: Unit 14 Scurlockstown Business Park, Trim, Co. Meath, C15 H008, Ireland.

t: +353 46 903 0102 m: +353 86 832 7792 e: info@rec.ie w: www.rec.ie

Galway Office: Office 18, Oran Town Centre, Station Road, Oranmore, Co Galway, H91 APK0, Ireland.

As a result of the meeting, An Coimisiún Pleanála determined the project was a Strategic Infrastructure Development under **Section 182A (9) (a)** Electrical Transmission Infrastructure, where the development includes:

*Section 182A - 9 ... transport of electricity by means of—
(a) a high voltage line where the voltage would be 110 kilovolts or more*

Pre-Application Consultation – Matters Arising (ACP-322861-25 Letter issued 09/10/2025)

- 1) *The Commission's representatives confirmed that neither the substation nor the Battery Energy Storage System (BESS) were a Class for the purposes of Environmental Impact Assessment (EIA) but the prospective applicant should undertake their own EIA Screening to determine if any other class was applicable to the development being proposed. They also advised that an Appropriate Assessment screening report should be prepared to inform whether further consideration of potential significant effects on European Sites could be addressed, if necessary, depending on the screening conclusions*

As agreed in the pre-consultation meeting, an EIA Screening Assessment and an AA Screening have been included with this submission. As per the conclusions of the Screening, an EIAR is not required for this project. As per the conclusions of the Screening an NIS is not required for this project.

- 2) *A Fire Risk Management Plan and Emergency Response Plan which should address arrangements for spent fire water including containment and prevention of contamination of ground or surface waters. Regard should be had to EPA Guidance on Fire Water Retention*

The application includes a Fire Management Plan with emergency response included in the application. The development includes fire water retention measures as presented in the Flood Risk Assessment report and associated drawings.

- 3) *A Flood Risk Assessment which should include consideration of risks from pluvial flooding.*

The application includes Site Specific Flood Risk Assessment that has included in this submission. The report considers pluvial flooding (Section 3.3.3 and in Appendix B)

- 4) *An Archaeological Impact Assessment which should include the presence of archaeological monuments and sites within the vicinity of the site. The unrecorded archaeological remains/deposits identified during recent investigations in the general area was noted.*

The Archaeological Impact Assessment for the site has been updated in relation to the recent finds reported and the AIA Report is included in this application. The assessment included site investigation of this site which identified no finds of interest. The CEMP

include Archaeological Change Finds protocol in accordance with the AIA recommendations for any and all excavation works proposed.

- 5) *The removal of trees and hedgerows (if any) should be quantified and appraised. A Landscape mitigation plan should be prepared which addresses any proposed loss. Regard should be had to net biodiversity gain. An Ecological Impact Assessment should be submitted which robustly considers the ecology and biodiversity of the site and the impacts and effects of the proposed development.*

The EclA Report accompanying this application includes survey information of the hedgerows bordering the site. A Landscape Management Plan is included in the application which highlights any such areas impacted by the construction and the proposed operational landscaping and screening of the site. The proposal is for net gain of hedgerow and trees, as a result of the development and the LMP highlights the proposal for native species usage in the hedgerows and screening of the project.

- 6) *A consideration of Landscape & Visual Impact and Noise Impact should be addressed. Reference in this regard was made to the supplementary information and cumulative considerations raised by Cork County Council in their assessment of the current Section 34 planning application.*

A Landscape and Visual Impact report has been prepared for this application including photomontages and analysis and is included in the submission.

- 7) *A Construction Traffic Management Plan, which should provide for orderly vehicular access and traffic management arrangements with the recently permitted SID on adjoining lands to the north (ABP 320532- 24 refers).*

As requested, an Outline Construction Traffic Management Plan, has been prepared for the project and included in the submission. This includes consideration of the projects in the immediate vicinity.

A Cumulative Impact Assessment Report has also been produced in relation to the assessment of potential cumulative effects for the surrounding projects.

- 8) *Concluding the discussion the Commission's representatives noted the existence of the 220kv Knockraha substation at this location and the 110kV substation recently permitted on the adjoining lands to the north (ABP-320532-24) and alternative option, of extending an existing or permitted substation as opposed to introducing further new substation infrastructure at this location*

Consultation with the other sites and the potential for joint works or shared services has been considered. Whilst shared substation facilities is not possible, ongoing discussion has allowed for potential joint development of the site access road in order to minimise the potential impact and an agreement to utilise the site entrance and access road completed in accordance with the adjacent site's approved planning application (ABP-321518-24) is ongoing.

As suggested in the Pre-Application Meeting, in association with the Environment and Planning Report which accompanies this application, Rowan have prepared and included a Cumulative Impact Report which is included in this application.

Consultation

As part of the planning application for 25/04155 in relation to this development Cork County Council notified statutory consultees in relation to the development and the application.

The following bodies were notified (17/02/2025) by letter from Cork County Council:

- ESB Offices
- Uisce Éireann
- An Taisce
- Department of Communications, Climate Action & Environment
- Commission for Regulation of Utilities
- Department of Defence
- Failte Ireland
- The Arts Council
- Inland Fisheries Ireland
- Health Service Executive
- Transport Infrastructure Ireland
- Irish Aviation Authority; and
- Cork County Council departments

We note as per the end of the consultation period 12/03/2025, no responses or submissions were received by these bodies.

Once the proposed application is submitted to the SID unit, the prescribed bodies as listed in the correspondence from An Coimisiún Pleanála (letter Ref: ACP-322861-25 dated 10th Nov 2025) will be notified of the application and directed to online resource where the full application documents can be reviewed.

A template letter is included with the application. A copy of the Letter to be sent to Cork County Council is also enclosed. A hard and soft copy of the application is being posted in conjunction with this submission so the document is available to review at the Council offices. The other prescribed bodies will be informed by letter (as per the template included) and the prescribed bodies will be as per letter Ref: ACP-322861-25 dated 10th Nov 2025, namely:

1. Minister for Housing, Local Government and Heritage
2. Minister for the Environment, Climate and Communications
3. Cork County Council (Copy of letter included)
4. Commission for the Regulation of Utilities
5. Transport Infrastructure Ireland
6. Uisce Eireann
7. Inland Fisheries Ireland
8. Office of Public Works
9. HSE
10. An Taisce
11. Heritage Council
12. An Chomhairle Ealaíon

- 13. Failte Ireland
- 14. Health and Safety Authority

This planning application is submitted directly to An Coimisiún Pleanála in accordance with section 182A of the Planning and Development Act 2000, as amended.

We submit that the Proposed Development, by reason of the Subject Site selection, the location and characteristics of the receiving environment, and the mitigation measures recommended in the accompanying supporting technical documents, when combined with the policy framework support for the use, is consistent with the proper and sustainable development of the area.

We look forward to written acknowledgment of receipt from An Coimisiún Pleanála in due course. If you have any queries in relation to any aspect of this letter, please do not hesitate to contact me.

Yours sincerely,



SIGNED:

Dr James Massey , Rowan Engineering Consultants Ltd, 14 Scurlockstown Business Park, Trim, Co. Meath, Ireland
(Agent acting on behalf of Applicant, Drumkee LCIS Ltd)

Enclosed is a copy of the SID application and all associated documents for submission to An Coimisiún Pleanála

The application comprises:

- Cover letter to An Coimisiún Pleanála
- Completed and signed SID application form
- SID Planning Application fee for applications under 182A of the Act for €100,000
- Copy of the Site Notice (erected 12th February 2026)
- Copy of the Newspaper published in 'The Echo' on the 13th February 2026
- Copy of the Newspaper published in 'The Examiner' on the 13th February 2026
- Appropriate Assessment Screening prepared by IDEC
- Ecological Impact Assessment prepared by IDEC
- EIA Screening prepared by Rowan
- Environmental and Planning Report prepared by Rowan
- Landscape and Visual Impact Assessment prepared by Macroworks
- Photomontages prepared by Macroworks
- Landscape Management Plan prepared by Macroworks
- Site Specific Flood Risk Assessment prepared by ORS
- Fire Risk Management Plan prepared by ORS
- Outline Traffic Management Plan prepared by ORS
- Noise Impact Assessment Report prepared by Enfonic

- Cumulative Impact Assessment Report prepared by Rowan
 - Construction Environmental Management Plan prepared by Rowan
 - Archaeological Impact Assessment Report prepared by ICON Archaeology
 - Copy of the Letter to be issued to Cork County Council
 - Copy of the letter template to be issued to the statutory consultees listed in this letter, as stipulated by ACP Letter dated 10th November 2025.
 - Copy of Landowner consent letter
 - Letter of appointment of Rowan as Agent to Drumkee LCIS Ltd
- Drawings prepared by Mable Consulting Engineers with additional drawings completed by the applicants ultimate parent company Noriker Power Ltd.

Drawing	Author	Submission Document Name
18m High Lightning Rod Details	Mable	18m High Lightning Rod Details.pdf
Customer Switchgear Building	Mable	Customer Switchgear Building.pdf
Fire Water Reservoir Details	Noriker	NPL_KNK_Fire-Water-Reservoir_0.0_P.pdf
Proposed 110kV BESS Compound Plan View	Noriker	NPL_KNK_110kV-Compound-Drawing_0.0_P.pdf
AIS Equipment Elevations	Noriker	NPL_KNK_AIS-Equipment-Elevations_0.0_P.pdf
Proposed Drainage Layout Plan	Noriker	NPL_KNK_Drainage-Plan_0.0_P.pdf
Proposed Site Sections	Noriker	NPL_KNK_Proposed-Site-Sections_0.0_P.pdf
Silt Fence Details	Mable	Silt Fence Details.pdf
Site Entrance & Sightlines	Noriker	NPL-KNK_Site-Entrance-And-Sightlines_0.0_P.pdf
Site Layout Map A	Noriker	NPL_KNK_Site-Layout-MAP-A_3.5_P.pdf
Site Layout Map B	Noriker	NPL_KNK_Site-Layout-MAP-B_3.5_P.pdf
Site Layout Plan - Key Plan	Noriker	NPL_KNK_Site-Layout-Map-Key-Plan-3.5_P.pdf
Site Location Map - Scale 1:2500	Noriker	NPL_KNK_Site-Location-Map-Scale-1:2500_0.0_P.pdf
Site Location Map - Scale 1:10560	Noriker	NPL_KNK_Site-Location-Map-Scale-1:10,560_0.0_P.pdf
TSO Switchgear Building	Mable	TSO Switchgear Building.pdf
Typical 20ft Container Details	Mable	Typical 20ft Container Details.pdf
Typical 40ft Container Details	Mable	Typical 40ft Container Details.pdf
Typical CCTV & Lighting Poles Details	Mable	Typical CCTV & Lighting Poles Details.pdf
Typical Drainage Details	Noriker	NPL_KNK_Typical-Drainage-Details_0.0_P.pdf
Typical Generator & Auxiliary Transformer Details	Mable	Typical Generator & Auxiliary Transformer Details.pdf
Typical Palisade Fence & Gate Details 1	Mable	Typical Palisade fence & Gate Details 1.pdf
Typical Palisade Fence & Gate Details 2	Mable	Typical Palisade fence & Gate Details 2.pdf
Typical Section Through Site Track	Mable	Typical Section Through Site Track.pdf
Typical Site Equipment Details	Mable	Typical Site Equipment Details.pdf