NORIKER POWER

Response to Submissions

ACP-324082-26

Harnessing Complexity

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Response to Submissions on behalf of Drumkee LCIS Limited

Case Number Reference: ACP-324082-26

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Version Management

Table 1. Version Record

Version	Transmission	Author	Change Description	Date	Sections Changed
2.0	External (E)	AC	External Release	11/05/2026	N/A
1.1	Internal (I)	AC	Initial Review	06/05/2026	N/A
1.0	Internal (I)	MH	Initial release	23/04/2026	N/A

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Associated & Reference Documentation

Table 4. Planning documents submitted to An Coimisiún Pleanála for planning reference ACP-324082-26

Document Name
Environmental and Planning Report
Cumulative Impact Assessment Report
Construction & Operation Environmental Management Plan
Outline Construction Traffic Management Plan
Flood Risk Assessment
Fire Strategy Review Report
Ecological Impact Assessment
Appropriate Assessment Screening Report
Environmental Impact Assessment Screening Report
Landscape & Visual Impact Assessment
Landscape Management Plan
Drainage Plan
Archaeological Impact Assessment
Letters to Prescribed Bodies
Site Layout Map Key Plan

1 Introduction

1.1 Purpose

This report has been put together by the ultimate parent company of Drumkee LCIS Limited, Noriker Power Ltd. The purpose of this report is to respond to a letter from An Coimisiún Pleanála (ACP) dated 15 April 2026, inviting the applicant (Drumkee LCIS Limited) to respond to the 11 no. submissions received in respect of a Strategic Infrastructure Development (SID) Planning Application for the proposed Knockraha BESS development in Co. Cork (ACP case reference number 324082-26).

Each submission has been reviewed and considered in equal capacity to adequately respond to any concerns or observations raised by third-party observers or prescribed bodies. Each observation is discussed in a specific section in this report relevant to their source.

Although some of the observations raised do not necessitate a response, it should not be perceived that the applicant agrees or accepts those comments. The report instead focuses on the points raised which the applicant believes warrants a specified response that may be helpful for ACP in making their determination on the planning application.

1.2 Overview of the Proposed Development

The SID planning application lodged with ACP on 17 February 2026 is summarised as follows:

The proposed 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.

All associated planning documents used as reference for observations from third-parties and prescribed bodies can be seen on the proposed development's website www.drumkeelcis.com.

2 Response to Third-Party Observations

2.1 Overview

There were 11 no. observations received on the application for the proposed development by ACP. These observations originated from both third party observers and prescribed bodies. Of the 6 no. observations received by ACP from third-parties, they raised a number of concerns which have been listed in Table 5.

Table 5. Observations Raised by Third-party Observers

Observation Subject	Section Discussed
Private Water Sources	2.2.1
Public Consultation	2.2.2
Fire Water Supply	2.2.3
Flooding	2.2.4
Toxic Gas	2.2.5
Spilages	2.2.6
Drainage	2.2.7
Battery Fire Suppression Systems	2.2.8
Battery Unit Location	2.2.9
Fire & Rescue Response	2.2.10
Land Selection	2.2.11
Public Roads	2.2.12
Noise	2.2.13
Visual Impact	2.2.14
Biodiversity	2.2.15
Grid Connection	2.2.16
Site Entrance	2.2.17
National Planning Framework	2.2.18

2.2 Observations and Responses

2.2.1 Private Water Sources

Multiple third-party observations raise concern that many residents rely upon a private well as their primary water source due to there being no mains water provided by Uisce Éireann.

They have raised concerns that spillages from the proposed development will enter the ground water supply and infiltrate their private water sources, causing contamination to their drinking water.

Response

Table 4.1 of the Environmental Impact Assessment Screening Report (EIASR) outlines the drainage specifications included in the Drainage Plan with specifications of their effectiveness in preventing flooding or contaminated water being discharged from the site. Upon appointment of a construction contractor the drainage plan will be further developed to ensure that there are

no water supplies at risk from the proposed development and that contaminated water is ensured to not enter ground water supply affecting private water supplies.

2.2.2 Public Consultation

Multiple third-party observations raise concern over limited public engagement for the development and planning procedure by the applicant.

They identify that there has been limited understanding of progression through the applications made and that there have been several attempts to both Co. Cork planning authorities and ACP.

Response

The applicant has provided all statutory public information and notifications under the requirements of an SID application to ACP. Notification about the development was provided in both national and local newspapers.

Furthermore, the applicant has created a project website where there are available contact details to raise any comments throughout development, construction and operations of the proposed development.

2.2.3 Firewater Supply

All third-party observations raise concern over the onsite firewater reservoir of the proposed development.

It is identified through the Fire Strategy Review Report submitted to ACP that the firewater reservoir will retain 500,000 litres of water for use in the unlikely event of a fire on site. The primary concern is that this volume is not significant enough to be able to combat fires on a site of this nature effectively.

Response

The applicant has developed the design of the site in accordance with National Fire Planning Association (NFPA) guidelines. There is currently no specified guidance on firewater reservoir volumes, however in the unlikely event of a fire, 500,000 litres can sustain high pressure water flow for hours.

2.2.4 Flooding

Multiple third-party observations raise concern over the potential increase in risk of flooding caused by developing an open field into an industrial type site.

Due to the addition of man-made structure, earthworks and foundations, there needs to be a clear and effective drainage strategy to prevent flooding. It is noted that within the area of the proposed development there have been cases of flooding with a concern over potential future flooding events.

Response

The applicant understands any concern in increased risk for flooding and has developed a drainage plan to effectively mitigate the risks of flooding as a result of the proposed development. Section 6 of the Construction & Operational Environmental Management Plan (COEMP) specifies the drainage infrastructure will be developed to suit the Site topography.

2.2.5 Toxic Gas

Multiple third-party observations raise concern that there could be a potential release of toxic gases in the unlikely event of a fire at the proposed development.

These comments look to identify the potential impact on both residents and the environment, and how far that impact may occur from the boundary of the Site. As there have not been any specifications released on the specific supply of battery units, would there be any additional concerns over gases or are there mitigations that may prevent this subject from being a concern.

Response

Appendix A2.0 in the Fire Strategy Review Report states that "*NFPA 855 identified the Hazard Mitigation Analysis (HMA) as the primary mechanism for demonstrating that ESS hazards have been suitably identified and mitigated, including thermal runaway, propagation potential, flammable and toxic gas release, deflagration risk, failure of ventilation / thermal management, and interaction between ESS units and exposures.*" The report then goes on to say "*the HMA is therefore identified as a key deliverable to be provided during design development, informed by the manufacturer's safety documentation and representative system test evidence*".

Once a battery OEM has been selected, the specific BESS unit will be UL 9540 compliant (or the latest battery safety standards at the time of procurement) to ensure equipment on site meets the highest safety requirements.

2.2.6 Spillages

One third-party observation raised concern over the risk of oil spillages and other hydrocarbons on the site due to the general requirement of equipment, construction and operations and maintenance of the proposed development.

In addition, the comment also raises concern over the effectiveness of any filters against contaminants that are non-hydrocarbon based.

If there are spillages, there is a concern that these could enter the ground and cause long term damage and pollution to the soil or enter ground water supply and contaminate private water water supplies.

Response

The primary use of oil is in the cooling systems for transformers. This plant equipment will be specified upon further development of the project but all transformers utilise a bund to collect any discharge of oil which occurs during operations. The removal of oil will then be dealt with by a specialist third party in the unlikely event of a spillage. As stated in Section 4.3 of the Construction & Operational Environmental Management Plan (COEMP), minimal volumes of oil/fuels/chemicals are expected to be stored on site. It further describes the storage capabilities and preventative measures in place to help prevent spills. It also refers to the ability to contain and dispose of any hazardous materials in the event of a spillage.

The COEMP outlines the mitigation measures and control for spillages in Section 6. Storage of fuels, other hydrocarbons and chemicals will not be permitted within 50 m of any watercourse with all such materials being stored within bunds with sufficient capacity to prevent the risk of contamination to both the ground and local water sources.

Once construction contractors are appointed to the Project, further water course assessments will take place to aid detailed design of the Site's drainage systems. This will help ensure that in the unlikely event of a fire, other non-hydrocarbon contaminants that may come from firewater runoff will not enter the groundwater or surface watercourses.

2.2.7 Drainage

Multiple third-party observations raise concern on the effective strategy and use of drainage for the Site to both prevent any increase in flood risks and to ensure that if any water becomes contaminated, it does not enter the ground or local water supply.

Although a drainage plan has been developed by the applicant, there is a request for further detail to ensure the methods used and specific systems suggested will adequately protect both local residents, wildlife and the environment.

Response

Once specific contractors are appointed to the construction of the project, the drainage plan will be further developed during detailed design to ensure the drainage system across the entire site will be specified to make sure water run off is collected and dealt with effectively, mitigating flood risk. The drainage plan specifies the collection of water into the retention basin which can then pump and clean collected water into the firewater reservoir. This pumping system will be controlled to ensure any contaminated water is not pumped into the firewater reservoir in the unlikely event of a fire on site.

2.2.8 Battery Fire Suppression Systems

Multiple third-party observations raise concern over the lack of information specifying battery fire suppression systems and what the potential impact is in the unlikely event of a fire starting at the proposed development.

A specific battery or manufacturer has not been identified in the reports to be able to provide specified information on battery unit fire suppression systems and the risks associated with the type of development.

Response

Section 8 of the Fire Strategy Review Report details the fire protection systems that are contained in each physical container as per manufacturer guidelines. This ensures that should a fire occur, it cannot propagate through the site and is contained within an individual unit until it extinguishes. Appendix B of the report details UL 9540 which is a safety certification battery manufacturers must be compliant with and is recognised in NFPA 855 and the International Fire Code. This certification ensures the units are evaluated by a third party, the whole system (batteries, inverters, control systems, wiring, interconnections and enclosure construction) are assessed together as a system, the components used to make the units meet their respective standards (UL 1973 for batteries and UL1741 for inverters) and there is ongoing compliance monitoring through factory inspections.

2.2.9 Battery Unit Location

One third-party observation raises concern over the location and spacing between individual BESS units.

Information has been quoted in an observation referencing minimum distances from the perspective of fire safety and the risk of containment to a single unit. The applicant has presented a site layout of the proposed development which pairs battery container units with no visible gap between them, therefore raising the question of spacing in the unlikely event of a fire starting and spreading beyond an individual battery unit.

Response

Section 7 of the Fire Strategy Review Report details individual container spacing which is NFPA 855 compliant.

The separation distances between the container pairs is shown to be 3 m in the planning drawing titled "Site Layout - Map B". While the individual units in the pairs are less than 3 m apart, there is a note in Section 7 of the Fire Strategy Review Report that states: "*The BESS system designer adopts IEC 62933-5-2, which aligns closely with NFPA 855. The spacing requirements must be supported by performance testing in accordance with UL 9540A. Although NFPA 855 provides prescriptive spacing criteria that are not specified in the IEC 62933-5-2, it allows the system designer or manufacturer to utilise higher battery energy capacities with reduced spacing, provided that UL 9540A testing demonstrates thermal runaway containment and the absence of further propagation. The system designer has agreed to comply with these requirements and to provide sufficient test data at the detailed design stage*."

2.2.10 Fire & Rescue Response

Multiple third-party observations raise concern over the locality of the emergency services, specifically fire and rescue, and their ability to attend the Site rapidly in the unlikely event of a fire starting on site.

The comments identify that a strategy has not been put in place nor a consultation made with the local fire department. Assurances are required over the effectiveness to tackle the specific type of potential fire which could occur on a development of this type, and the time in which emergency services are capable of reaching the site location.

Further comments have also identified the requirement for specialised equipment for the type of fires which may occur on sites such as the proposed development. Without clear evidence of consultation with fire and rescue services there is concern as to how, in the unlikely event of a fire, emergency response can effectively tackle these types of fires associated with battery energy storage facilities.

Response

The Site's access roads have been designed around a standard 'Pump' type appliance as the fire service don't need highly specialised vehicles. Specialised equipment is built into the units (e.g. the internal aerosol suppression system mentioned in Section 8 of the Fire Strategy Review Report) so the fire service does not need to bring anything specialised.

The Fire Strategy Review Report refers to "*UK Grid-Scale BESS Safety Guidance*" in Appendix B. This safety guidance states that battery fires require prolonged cooling periods and significant water supplies which are intended to be provided by the proposed firewater reservoir, used in conjunction with the standard 'Pump' type appliance.

NFPA guidelines do not mandate a specific response time from fire and rescue services but rather focus on preparedness which the proposed development achieves with the internal fire suppression systems, adequate container spacing, and further specified fire suppression systems once battery type has been selected for the project.

Once a construction contractor is appointed to the project, an emergency response procedure will be developed further to encompass any further requirements. This will be developed in conjunction with fire safety and emergency specialists.

2.2.11 Land Selection

Multiple third-party observations raise concern over the land or site selection due to the nature of the plot selected for the proposed development.

There are points raised about the current agricultural usage of the Site which is due to become an industrial project, why the Site is located within an area of residential properties, and the process by which the Site was selected for the proposed development.. The request is to

understand why this site has such importance to be developed for the purpose of a battery energy storage facility and the implications on land usage in an agricultural area.

Response

Section 2.8 of the Environmental and Planning Report (E&P) describes the reasons behind the specific site selection for the proposed development. Analysis undertaken at the beginning of project development identified a limited number of substations with strategic interest on the transmission network of the electrical grid.

Critical analysis was undertaken by the applicant to identify a site for the proposed development considering residential proximity, ecological constraints, water features, flood risk, archaeological and cultural heritage features, existing vegetation screening, and access to the public road network. With all factors in comparison and the analysis of an alternative location, selection of the Site was determined to have the least impact on factors previously stated.

The Site for the proposed development does not fall within an area zoned for land use, nor is it located within Special Areas of Conservation, Special Protection Areas, or Natural Heritage Areas. It is noted that Co. Cork were informed of the development as a Prescribed Body at the time of application yet made no comment of concern on the classification of the land at the proposed development.

Section 2 of the E&P report notes that due to the proximity of the Knockraha 220 kV substation, the need for additional infrastructure and land take is minimised. The selection of location stands to cause minimal disruption due to proximity to grid infrastructure and the topographical nature of the site to prevent the need for extensive excavation and construction works across more land.

2.2.12 Public Roads

All third-party observations raise concern over the increased traffic on the local road network surrounding the proposed development.

This identifies not only drivers but also pedestrians and cyclists being at risk from increased traffic using the public road network.

One comment has agreed that the Outline Construction Traffic Management Plan (OCTMP) is a comprehensive report, identifying and mitigating multiple risks. The observer has then requested that sufficient conditions of planning be imposed based on the report produced to ensure the safety and traffic flow for local residents, road users and pedestrians.

Response

The OCTMP has been created to provide an outline of construction traffic management precautions and safety measures. Once a specific construction contractor is appointed to the proposed development a more stringent and accurate measure of traffic volumes can be assessed and shared with the public. Representing accurate vehicle movements will allow for a clearer scheduling of deliveries to the Site, therefore increasing road safety beyond an already comprehensive OCTMP.

Section 2.4.1 of the OCTMP states that a Detailed Traffic Management Plan (DTMP) will be developed and confirmed with the planning authority at the preconstruction stage. In further response to observations made by Transport Infrastructure Ireland (TII), the applicant accepts the recommendations for planning conditions relating to this as specified in Section 3.2.4 of this report.

During the operational phase of the project there will only be minimal requirement for engineers to attend site for maintenance purposes. In this circumstance small or singular teams will arrive in a single vehicle causing little to no effect on the local road network.

2.2.13 Noise

Multiple third-party observations raise concern regarding the increase in noise from the proposed development and its associated equipment throughout both construction and operational phases.

These observations also consider the cumulative impact of noise from the development of several infrastructure projects in the area that connect into the Knockraha substation.

Within comments regarding noise impact, the point specified is continuous low frequency output from inverters and cooling systems. With the proposed development operating 24 hours a day, there is a requirement to understand the potential impact on people and livestock within the area.

Response

The Noise Impact Assessment uses A-weighted dB scaling when assessing noise at sensitive receptors. This means that the raw sound pressure is adjusted to match the human ear's natural sensitivity. A standard dB sound pressure level measure treats all frequencies equally, but human ears do not. Human ears are tuned to hear mid-range frequencies much more clearly than very low or very high frequencies. The A-weighted scale therefore reflects what humans actually perceive. The Noise Impact Assessment concluded, based on these A-weighted values, that there is no significant noise expected. Proposed mitigations were also set out in this report should any noise issues arise.

2.2.14 Visual Impact

Multiple third-party observations raise concern over the visual impact constructing an industrial type site in a rural landscape.

The location selected is slightly elevated in view of some directions looking onto the Site. The major concern is having significant infrastructure installed in a location which currently has no negative visual impact on the local landscape and residents within the area.

Response

The applicant appreciates the surrounding environment of the proposed development to be a rural location. Noted in Section 1.3.2 of the Landscape & Visual Impact Assessment (LVIA) is that there are no designated scenic routes or views within 3 km of the study area. Section 1.6 of the LVIA highlights that although there are a great deal of hedgerows and vegetation the immediate context of the Site is influenced by the existing Knockraha 220 kV Substation.

The Landscape Management Plan demonstrates the proposed vegetation to be included in the Site layout in order to mitigate the visual impact of the Site. Growth of vegetation over time will help to ensure any negative impact on visual receptors is mitigated. The LVIA specifies in Section 1.5 the typical hedgerow types to be installed at the site to aid in mitigating the visual impact of the proposed development.

Section 1.5 of the LVIA states that the main mitigation measure is the siting of the proposed development itself being in a robust landscape consisting of electrical infrastructure. Demonstrated in the photomontages submitted as part of the planning application, it is clear that the existing electrical infrastructure of the Knockraha Substation provides significant shielding of the proposed development from a number of visual receptor locations.

Further mitigation measures in Section 1.5 of the LVIA recommend increasing planting, which the applicant accepts, and will ensure is developed with the appointed construction contractor to aid the visual screening of the proposed development.

The conclusion of the LVIA is that the visual effects of the proposed development are not considered to exceed slight significance and the proposed development represents a well-sited and scaled development.

2.2.15 Biodiversity

One third-party observation raises concern over the potential negative impact on biodiversity.

Their concern is the loss of land to industrial type development which will interfere and displace animals, birds and insects as well as a loss of flora. The request is to ensure the correct protection of biodiversity be included in all planning applications and consideration of the impact of the proposed development on the rural landscape be further reviewed.

Response

As the selected site for the proposed development will change the land use, the applicant acknowledges that mitigation measures will need to be introduced to ensure minimal impact on biodiversity in a rural location. Section 5.6 of the Ecological Impact Assessment (EcIA) summarises that the proposed development will have no predicted impacts on local ecology and biodiversity.

Submitted with the planning application is a detailed Landscape Management Plan (LMP). The combination of retained and new hedgerows is designed to encourage a range of wildlife, utilising native species of plants, while also providing screening of the proposed development from beyond the Site boundary.

The applicant accepts the recommendations laid out in the EcIA in regard to retaining and maintenance of hedgerows surrounding the Site. Further recommendations include construction phase lighting use and type for health & safety purposes to ensure minimal disturbance on bat populations. This will be developed in conjunction with the appointed construction contractor during detailed design.

2.2.16 Grid Connection

One third-party observation raises concern over the lack of specific or approved grid connection for the proposed development.

Without a specific grid capacity contract there is a question over the specific need for the proposed development to be entered into a planning application process.

Response

Under the Electricity Connection Policy – Generation and System Services (ECP-GSS) published by the Commission for Regulation of Utilities, Planning Consent is required for non-Renewable Energy Directive III projects (European Union directive EU/2023/2413) prior to the application for a Grid Connection with the Transmission System Operator.

2.2.17 Site Entrance

Two third-party observations raise concern that the proposed development is to utilise the already approved site entrance and access road in the approved planning application ABP-320532-24.

On review of both applications it would suggest that there are two different site entrances proposed within the drawings presented to ACP leading to the question over which entrance will be used or whether there will be two site entrances onto Ballynanelagh public road. The confirmation over site entrances would provide clarity on whether there would be an increased risk to road users.

Response

In the interest of minimal disruption to local residents and prevent any further safety risks on the public road network, the applicant has aligned their plans with the already approved Ballyvatta Substation development (ABP-320-532-24) so that only one single access road connects to the public Ballynanelagh road. The final design will be specified prior to construction to ensure that both developments will be able to utilise the access road and reduce the cumulative risks of multiple projects accessing the public road network.

Supporting the applicant's desire to ensure road user safety, a site entrance and sightlines drawing has been submitted to ensure the visibility when entering and exiting the Site allows clear unobstructed views. The E&P report notes that a Detailed Construction Management Plan will be developed once a contractor is appointed to the project. This will be developed in conjunction with the Ballyvatta Substation road access to ensure safe access onto Ballynanelagh road throughout the construction phase of the proposed development.

2.2.18 National Planning Framework

One third-party observation raises concern over the suitability of the project based on national policy objectives outlined in the Project Ireland 2040 - National Planning Framework (NPF).

The observation states that the proposed development is in conflict with several objectives including the protection of agricultural land and rural economy, impact on rural landscape and cultural heritage, and environmental concerns and sustainable land use.

These concerns evaluate the NPF and its objectives protecting landscapes and national regions from visual and environmental perspectives.

Response

The applicant has developed the project in line with the policies laid out in the National Planning Framework 2040 (NPF) in the pursuit of achieving climate targets. Alongside this, Section 3 of the E&P report outlines all of the national, local and European policies which the development of the Project would support and enable, therefore helping to achieve established climate targets. Section 3.2 of the E&P report demonstrates national targets within the NPF which is to transition Ireland to a low carbon and climate resilient society, with National Policy Objective 55 referring to the promotion of *'renewable energy use and generation at appropriate locations within the built and national environment to meet national objectives towards achieving a low carbon economy by 2050*'.

Section 2.5 of the E&P report describes the need for the proposed development in providing an energy storage facility for intermittent power sources such as wind and solar. The Project will assist in the support of Eirgrid's DS3 scheme to enable further integration of renewable energy power sources by increasing grid security. In doing so the proposed development is considered to comply with the NPF.

Stated in Section 2 of the E&P report is the proposed development does not fall within an area zoned for land use, nor is it located within Special Areas of Conservation, Special Protection Areas, or Natural Heritage Areas, therefore presents minimal impact on the NPF objectives stated in the third-party observation.

Section 2.3.1 of the Environmental Impact Assessment Screening Report (EIASR) further reinforces the need for projects such as the proposed development, providing critical services such as frequency services and increasing power flow capacity on the grid that increases head room for more renewable power generation.

Furthermore, the Cork County Development Plan 2022-2028 (CDP) outlines its own policies and objectives for sustainable development and planning. Section 3.3 of the E&P report lists the

specific objectives in the CDP by which the project meets local requirements for enabling sustainable development and achieving renewable energy targets by 2050.

In addition, Section 1.7 of the LVIA explains that the proposed development is contained within a robust part of County Cork and is not considered to conflict with any landscape and visual policies or objectives set out in the current Cork CDP.

3 Responses to Prescribed Bodies

3.1 Overview

The applicant notified 14 no. prescribed bodies upon application of the proposed development to ACP. Upon notification each body was invited to provide comment or observations on the SID application in relation to the area of specialist jurisdiction.

Table 6 presents the prescribed bodies which were notified of the proposed development.

Table 6. Letters to Prescribed Bodies

Prescribed Body	Dated
Minister for Housing, Local Government and Heritage	16th February 2026
Minister for the Environment, Climate and Communications	16th February 2026
Cork County Council - Planning Department	16th February 2026
Commissioning for the Regulation of Utilities	16th February 2026
Transport Infrastructure Ireland	16th February 2026
Uisce Éireann	16th February 2026
Inland Fisheries Ireland	16th February 2026
Office of Public Works	16th February 2026
Health Service Executive	16th February 2026
An Taisce	16th February 2026
Heritage Council	16th February 2026
An Chomhairle Ealaion	16th February 2026
Fáilte Irelande	16th February 2026
Health and Safety Authority	16th February 2026

From the 11 no. observations made to ACP regarding the proposed development application (ACP-324082), 5 no. were made by statutory bodies which are listed in Table 7.

Table 7. Observations from Prescribed Bodies

Prescribed Body	Section Response
Department of Housing, Local Government and Heritage	3.2.1
National Health Services Executive	3.2.2
Inland Fisheries Ireland	3.2.3
Transport Infrastructure Ireland	3.2.4
Uisce Éireann	3.2.5

3.2 Prescribed Bodies Observations and Responses

3.2.1 Department of Housing, Local Government and Heritage

The Department of Housing, Local Government and Heritage reviewed the Archeological Impact Assessment (AIA). Within their observation they are noted to be broadly in agreement with the finding in the AIA in relation to Archaeological and Cultural Heritage.

As such this department has recommended the following conditions be applied upon any grant of planning:

1. All mitigation measures in relation to archaeology and cultural heritage as set out in the Archaeological Impact Assessment (date February 2026) shall be implemented in full, except as may otherwise be required in order to comply with the conditions of this Order.
2. The Construction Environment Management Plan (CEMP) shall include the location of any and all archaeological or cultural heritage constraints relevant to the proposed development as set out in the Archaeological Impact Assessment (date February 2026) and by any subsequent archaeological investigations associated with the project. The CEMP shall clearly describe all identified likely archaeological impacts, both direct and indirect, and all mitigation measures to be employed to protect the archaeological or cultural heritage environment during all phases of site preparation and construction activity.
3. The planning authority and the National Monuments Service of this Department shall be furnished with a final archaeological report describing the results of all archaeological monitoring and any archaeological investigative work/excavation required, following the completion of all archaeological work on site and any necessary post-excavation specialist analysis. All resulting and associated archaeological costs shall be borne by the developer.

Reason: To ensure the continued preservation (either in situ or by record) of places, caves, sites, features or other objects of archaeological interest.

Response

The applicant has reviewed the proposed planning conditions which should be applied upon any grant of planning and accepts the recommendations of the Department of Housing, Local Government and Heritage's assessment and observations.

3.2.2 Health Services Executive

The Health Services Executive (HSE) considers a number of points as part of their observations and submission identifies where clarification may be beneficial. For each observation there has been a recommendation which will be addressed in the responses on behalf of the applicant.

The observations raised and their associated responses from the applicant are as follows:

3.2.2.1 ***4. Public Consultation and community engagement***

It does not appear that detailed information has been provided on how ongoing communication with the local community will be managed during construction and operation. In particular, a clear process for addressing queries or complaints from residents is not evident.

Recommendation :

It is recommended that a community engagement approach be outlined, including a point of contact and a clear process for managing and responding to any concerns raised by local residents.

Response

The applicant agrees that community engagement is of key importance. Before construction begins there will be a clear definition on lines of communication to relevant points of contact including the appointed contractors for the project. The project website will remain an open point of communication with the relevant email address and phone number for responding to any concerns raised by local residents. The applicant also agrees that a community engagement approach be developed to help address any issues raised.

3.2.2.2 ***5. Population and Human Health***

It does not appear that a detailed assessment of potential impacts on human health has been included. In particular, there is limited information on how potential impacts associated with accidental events, such as fire or system failure, may affect nearby residential properties (approximately 200m from the site). Consideration of cumulative effects in combination with the adjacent substation is also not clearly outlined.

Recommendation:

It is recommended that further consideration be given to potential impacts on human health, including scenarios such as fire or system failure, and how these would be managed to protect nearby residents.

Response

The applicant acknowledges the observation made regarding population and human health in regard to scenarios such as fire or system failure. In response to this, once a BESS OEM is selected, it will help determine the appropriate response levels required due to their internal system failure and fire suppression systems. Once final detailed design, OEMs and contractors are appointed, an emergency response plan will be developed.

3.2.2.3 ***6. Noise and Vibration:***

A Noise Impact Assessment has been carried out, including baseline monitoring and predictive modelling following recognised guidance.

However, it does not appear that specific noise characteristics associated with battery storage systems, such as low-frequency or tonal noise, have been fully explored. In addition, details of any ongoing noise monitoring or complaint management procedures are not clearly outlined, and cumulative impacts with the adjacent substation are not fully described.

Recommendation :

It is recommended that further detail be provided on specific noise characteristics and that consideration be given to monitoring and a clear approach to managing any noise-related concerns.

Response

The applicant understands that there will be a number of noise factors to consider as a result of the proposed development. Noise Impact Assessments are validated during the commissioning phase to ensure compliance. Furthermore, when selecting the BESS OEM supplier, the equipment will be such that it complies with the Noise Impact Assessment and planning requirements. As with other concerns for the project, open lines of communication will be available for view and contact on the project website.

Section 6 of the Noise Impact Assessment report states that neither the batteries, inverters nor transformer meet the criteria for identifying a tonal component so no penalty is applicable.

3.2.2.4 ***7. Water (Hydrology and Hydrogeology)***

The documentation outlines standard drainage and surface water management measures, including pollution prevention practices during construction.

However, it does not appear that detailed consideration has been given to how contaminated runoff, including firewater, would be managed in the event of an incident. Information on groundwater protection and monitoring is also limited.

Recommendation :

It is recommended that further detail be provided on the management of contaminated runoff and the protection of groundwater, including consideration of monitoring where appropriate.

Response

The applicant appreciates that there is potential risk towards groundwater supply, however the current Drainage Plan has been developed for the collection and storage of contaminated water into the deep retention basin. In the event of a fire, contaminated water will be directed through the drainage layout to the retention basin which will be disposed of by a specialist third party company.

When specific contractors are appointed to the construction of the project, further development of the drainage plan will be conducted involving specialists. In doing so the developed plan will ensure that no contaminated water will enter the groundwater supply.

3.2.2.5 ***8. Fire Detention and Prevention System***

The documentation includes general fire and emergency procedures and refers to a Fire Strategy Review Report.

However, it is not clear what specific fire detection and prevention systems are proposed for the battery storage units, or how their adequacy has been demonstrated for this type of development.

Recommendation :

It is recommended that further detail be provided on the proposed fire detection and prevention systems, including confirmation that they are appropriate for a battery energy storage facility of this scale.

Response

Appendix B of the Fire Safety Report details UL 9540 which is a safety certification battery manufacturers have to be compliant with and is recognised in NFPA 855 and the International Fire Code. This certification ensures the units are evaluated by a third party and Section 8 of the Fire Strategy report details the fire protection systems that are contained in each physical container as per manufacturer guidelines.

As further developments in safety measures are made within the manufacturing of BESS containers, once the specified supplier of battery units has been selected further details on the integrated fire suppression systems will be provided.

The applicant acknowledges the critical requirements for fire suppression systems in the event of a fire occurring at the proposed development, and would ensure that the selected battery manufacturer complies with internationally recognised and accepted guidelines.

3.2.2.6 ***9. Air Quality***

The documentation includes general consideration of air quality, with a focus on construction-related impacts such as dust.

However, it does not appear that detailed consideration has been given to air quality impacts during the operational phase, particularly in relation to abnormal scenarios such as fire or system failure. Consideration of potential impacts on nearby residential receptors is also limited.

Recommendation :

It is recommended that further consideration be given to air quality impacts during operational and abnormal scenarios, including potential effects on nearby receptors.

Response

The applicant acknowledges the concern for increased air pollution. Table 4.1 of the EIASR outlines that once the proposed development is operational and has incorporated design requirements, it is expected that these will minimise any potential impacts to the surrounding area. Due to the nature of the development there are no associated emissions to air or land during the operational phase. Fire suppression system details will form a key part of the selection of the BESS OEM. The rapid technological development of BESS units has seen an increase in safety systems and the applicant will select an OEM supplier with effective system solutions.

3.2.2.7 ***10. Major Accident Risk***

While general risk considerations are included, it does not appear that a detailed assessment of major accident scenarios has been provided. In particular, there is limited information on potential interactions with the adjacent substation or how such events would be managed to protect public safety.

Recommendation :

It is recommended that further detail be provided on potential major accident scenarios and the measures in place to manage these risks and protect nearby receptors.

Response

The COEMP outlines the Emergency Response Procedure (ERP) to address the unlikely event of an emergency on-site. Section 4 of the COEMP states that the construction contractor appointed to the proposed development will include the specific site provisions in the ERP.

3.2.2.8 ***11. Land and Soils***

The documentation includes standard construction mitigation measures for soil protection.

However, it does not appear that detailed consideration has been given to potential contamination risks during the operational phase, including from equipment or infrastructure associated with the development.

Recommendation :

It is recommended that further consideration be given to soil protection during operation, including potential contamination risks and any appropriate monitoring measures.

Response

Once OEMs and contractors have been appointed, further mitigation measures will be specified in final detailed design to ensure the ground protection from spillages.

3.2.2.9 ***12. Traffic and access***

A construction traffic management approach is outlined.

However, it does not appear that detailed consideration has been given to the capacity and condition of the local road network, which consists of narrow rural roads. Information on how potential impacts on local residents will be managed is also limited.

Recommendation :

It is recommended that further detail be provided on traffic management, taking into account local road conditions and measures to minimise disruption to residents.

Response

The Outline Construction Traffic Management Plan has made assessments of the type of roads approaching and surrounding the site. A specific traffic management plan Detailed Traffic Management Plan (DTMP) will be formulated once specific delivery and vehicle usage is decided in final design with the appointed contractors.

3.2.2.10 ***13. Lighting and Security***

Lighting and security infrastructure are proposed as part of the development.

However, it does not appear that a lighting assessment has been provided to consider potential impacts such as light spill or disturbance in this rural setting.

Recommendation :

It is recommended that consideration be given to potential lighting impacts and appropriate mitigation measures to minimise disturbance to nearby receptors.

Response

The applicant acknowledges the potential risks for lighting. Typical lighting designs have been submitted within the planning application and the points and direction of lighting will all be inwards towards the Site to reduce light spill. Section 6.2 of the Ecological Impact Assessment outlines the potential risks of light spill which are minimal and the suggested type of lighting to be used as mitigation. Lighting will also only be a requirement for safety and security purposes with further specified lighting requirements decided in final detailed design.

The Cumulative Impact Assessment specifies the potential impact from lighting of multiple developments in the area. Section 4.12 explains that the approved planning applications for the Ballyvatta Substation and Synchronous Compensator propose standard single down lights around the buildings for security, motion activated and hooded to minimise light impacts and spillage, as such the lighting for the proposed development will be comparable.

3.2.2.11 ***14. Site Facilities (Water Supply and Sanitary Provision)***

It does not appear that detailed information has been provided in relation to site facilities, including the provision of drinking water, sanitary facilities (e.g. toilets), or any canteen or rest areas for staff during construction or operation. While a welfare unit is referenced, the nature and standard of these facilities are not clearly described.

From a public health perspective, the availability of adequate drinking water and sanitary facilities is important to prevent potential health risks. In the absence of detail, it is unclear how these aspects will be managed on site.

Recommendation :

It is recommended that further detail be provided on the provision of drinking water and sanitary facilities for staff, including how these will be maintained to an appropriate standard to protect health.

Response

The applicant has specified the location of a Welfare Unit within the Site Layout plan. Once specific contractors are appointed, adequate welfare facilities will be installed within the designated area to ensure drinking water and sanitary facilities for staff appropriate to the Site requirements. The welfare unit will not require a water supply connection from Uisce Éireannare, instead this will be monitored and maintained by a third party contractor appointed prior to construction.

3.2.2.12 ***15. Conclusion***

Overall, the submitted documentation provides a general outline of the proposed development and includes standard environmental assessments and mitigation measures.

However, it appears that some areas would benefit from further detail and clarification, particularly in relation to potential impacts during operational and abnormal scenarios, and how these may affect nearby receptors. In addition, further information on certain practical aspects of site operation, including facilities and sanitary provisions, would help to support a more complete understanding of potential public health considerations.

The recommendations outlined above are intended to support a more complete understanding of potential environmental health impacts and to ensure that appropriate measures are in place to protect public health and the surrounding environment.

The National Environmental Health Service considers that the potential environmental health impacts identified in the submitted documentation can be appropriately managed, subject to the recommendations set out in this submission being secured by planning condition.

Response

The applicant notes the conclusion of the HSE observations on the proposed development and accepts the proposal of planning conditions will adequately ensure that any potential environmental health impacts will be appropriately managed and mitigated.

Further detailed information requested within the HSE comments will be provided upon engagement with specific contractors and selection of battery OEM to ensure mitigation measures are put in place to prevent any environmental health impacts.

3.2.3 Inland Fisheries Ireland

Inland Fisheries Ireland (IFI) reviewed the provided information from the application and is noted to provide no objection to the proposed development.

The IFI instead requested that planning conditions require there is no interference with, bridging, drainage, or culverting of, or abstraction from, any watercourse, their banks, bed or bankside vegetation to facilitate this development without the prior approval of IFI.

Response

The applicant has reviewed the suggested planning conditions suggested by IFI and accepts their assessment and observations regarding their application.

Section 1.2 of the Ecological Impact Assessment confirms that there are no surface water features on the Site or in the surrounding area, therefore demonstrating there is no risk to the conditions suggested from the proposed development.

3.2.4 Transport Infrastructure Ireland

Transport Infrastructure Ireland (TII) welcomes and supports the proposals aimed at achieving the transition to a low carbon and climate resilient economy, increasing renewable generation and enhancing energy security under the NPF. The observations made by this department come from the reviewing of information and the potential impact on national road network maintenance and safety.

It is noted that there is no objection to the proposed development presented by TII, however there are some specific observations made within their comments on the application.

Section 3.4 of the OCTMP indicates that transportation to the Site of Abnormal Loads is from the port of entry at Kennedy Quay. While there are assessments referencing a limited number of such deliveries, there is no information provided as to an assessment that the capability of the network identified will be able to accommodate such loadings nor temporary work to the national road network are identified which may be required as a result of this assessment.

In result of the reviewing of information presented by the application, it is recommended by TII to provide the following planning conditions:

1. *Full details of the transportation of all Abnormal Loads and all 'Exceptional Abnormal Loads' associated with the subject development shall be agreed with all planning and road authorities along all proposed haul routes prior to the commencement of any development.*

Such agreement shall include and address the following requirements;

a) The Exceptional Abnormal Load Vehicle diagram shall be provided to include Gross Vehicle Weight; Individual Axle Weights; Axle Spacing; and total vehicle length, width, and height. Exceptional Abnormal Load Vehicles shall comply with the standard configuration of a trailer with two bogies and two tractors; one pulling and one pushing as detailed within TII Publications AM-STR-06048.

b) All bridges to be crossed will need a full structural assessment by the developer in accordance with TII Publications AM-STR-06048 to verify that they can sustain the load safely and without any damage.

c) A Chartered Engineer with appropriate experience of assessing bridges for such Exceptional Abnormal Loads shall be required to certify that each structure to be crossed can sustain the loading regime safely and without damage. Appropriate Professional Indemnity Insurance shall also be in place.

d) Each local authority (who own the bridge assets and issue the load permits) shall be provided with an appropriate level of indemnity proportionate to the risk and the value of the bridge structures to be crossed.

e) Each local authority (who own the bridge assets and issue the load permits) shall be provided with insurance cover appropriate to the Risk and the value of the bridge structures to be crossed D.

f) Pre-structural sulveys and post-structural sulveys will be required.

2. *All necessary works required to accommodate the development proposals shall be identified. Any proposed works to the national road network to shall comply with TII Publications and shall be subject to Road Safety Audit as appropriate. Subject to the outcome of Road Safety Audit, works should ensure the ongoing safety for aIF road users. Works should ensure the ongoing safety for all road users.*
3. *Any damage caused to the pavement of the existing national road (e.g. tearing of the surface course) shall be rectified in accordance with TII Pavement Standards and*

details in this regard shall be agreed with the Road Authority prior to the commencement of any development on site.

4. *All national road and ancillary overground/underground assets shall be subject to proper undamaged reinstatement and properly certified to the relevant standards in accordance with the assets' functions together with any working widths/depths required.*
5. *Any operator who wants to transport a vehicle or load whose weight falls outside the limits allowed by the Road Traffic (Construction Equipment & Use of Vehicles) Regulations 2003, SI 5 of 2003, must obtain a permit for its movement from each Local Authority through whose jurisdiction the vehicle shall travel.*
6. *Where temporary works within any MMaRC Contract Boundary are required to facilitate the transport of any abnormal loads to site, the applicant/developer shall contact thirdpartyworks@tii.ie in advance, as a works specific Deed of Indemnity will be needed by TII before the works can take place.*
7. *All necessary Deed of Indemnity , licenses, approvals. or agreements with the local road authorities and TII shall be in place prior to any development commencing on site.*

Reason; *in the interests of safeguarding levels of safety and the strategic function of the national road network in accordance with National Strategic Outcome Number 2 of the National Planning Framework.*

Response

The applicant accepts the conditions recommended in the observation made by TII.

As stated in Section 2.4 of the OCTMP, a Detailed Traffic Management Plan will be developed to encompass the recommendations in conjunction with traffic, construction and safety specialists to ensure mitigation measures are effectively imposed to assist national road network maintenance and safety.

3.2.5 Uisce Éireann

The observations made by Uisce Éireann present no objection to the planning application made for the proposed development. This prescribed body has reviewed the information presented by the applicant in the E&P report and the COEMP.

The recommendations from Uisce Éireannare as follows:

Uisce Eireann requests that the potential risks to the downstream drinking water abstraction points are suitably considered within a revised Environmental Report and the Construction and Operational Environmental Management Plan, to be submitted and agreed with Uisce Eireann prior to commencement of works on the proposed Development site.

Uisce Eireann requests that all mitigation measures outlined within the COEMP are implemented throughout the duration of the construction and operation of the project.

The applicant proposes a Fire Fighting Water Reservoir on site to be fed by surface water. In the event of any change to this proposal or if any requirement to supplement the supply of the proposed reservoir from the public water supply network, the feasibility of any such connection to the public water infrastructure would require to engage with Uisce Eireann through the Pre-Connection Enquiry (PCE) process.

Response

The applicant accepts the conditions recommended by Uisce Éireann.

A request for information was made to the applicant via email by Uisce Éireann to clarify specific water connections for the proposed development. Appendix 1 includes the information

requested and the response demonstrating the lack of need for access to public water supply and drainage.

Information provided also gave clarification on the supply of water for the firewater reservoir, satisfying the request from Uisce Éireann. Specifically, water will be initially supplied to the reservoir using a tanker and the design will ensure that a minimum specified volume is retained at all times.

4 Conclusion

This document has addressed the observations made by third-party observers and prescribed bodies in respect of the Knockraha BESS project submitted to ACP by Drumkee LCIS Limited. The information provided constitutes a robust response to the comments raised utilising and clarifying the information submitted in the application to assist in the ongoing consideration of the planning application.

In review of the recommended conditions of planning suggested by the 5 no. prescribed bodies who made observations to ACP regarding the proposed development, the applicant has accepted their recommendations. The continued and structured development of the project, if granted planning, will ensure the mitigation measures proposed through these planning conditions can be implemented.

NPF and CDP objectives reinforce the need for renewable energy development to provide long term grid security and stability. The European Council Climate and Energy Policy Framework for 2030 highlighted in Section 3.1 of the E&P report outlines the specific climate targets which battery energy storage facilities, such as the proposed development, can assist in facilitating.

As outlined throughout this report, once OEM suppliers and construction contractors have been selected for the project, final detailed design will ensure they encompass recommended planning conditions recommended by prescribed bodies, which have been accepted by the applicant.

5 Appendix 1

5/7/26, 9:15 AM noriker.co.uk Mail - Uisce Éireann assessment of Knockraha BESS

Matthew Holloway <matthewh@noriker.co.uk>

Uisce Éireann assessment of Knockraha BESS

'John MacCarthy' via DrumkeelCIS Info <info@drumkeelcis.com> 1 April 2026 at 09:53
Reply-To: John MacCarthy <john.maccarthy@water.ie>
To: "info@drumkeelcis.com" <info@drumkeelcis.com>

To whom it may concern,

I am currently assessing the proposed Knockraha BESS in Cork. Can you, or a member of your engineering team, please contact me on 0871778314 to direct me to the relevant documents outlining prior engagement with Uisce Éireann in relation to the water demand to supply the Fire Fighting Reservoir proposed.

Le meas,

John MacCarthy

Regional Lead Development Planning Uisce Éireann

Is don duine amháin nó don eintiteas amháin ainmnithe ar an seoladh an fhaisnéis agus d'fhéadfadh ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh na tráchtála de a bheith mar chuid den fhaisnéis. Tá toirmeasc ar aon daoine nó aon eititis; nach dóibh siúd an fhaisnéis- aon athbhreithniú a dhéanamh, aon atarchur a dhéanamh nó aon athdháileadh a dhéanamh, nó aon úsáid eile a bhaint as an bhfaisnéis, nó aon ghníomh a bhraithfeadh ar an bhfaisnéis seo a dhéanamh agus d'fhéadfaí an dlí a shárú dá ndéanfaí sin. Séanann Uisce Éireann dliteanas as aon ghníomh agus as aon iarmhairt bunaithe ar úsáid neamhúdaraithe na faisnéise seo. Séanann Uisce Éireann dliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo agus séanann Uisce Éireann dliteanas maidir le haon mhoill a bhaineann leis an bhfaisnéis a fháil. Má tá an ríomh-phost seo faighte agat trí dhearmad, déan teagmháil leis an seoltóir más é do thoil é agus scrios an t-ábhar ó gach aon ríomhaire. D'fhéadfadh ríomhphost a bheith so-ghabhálach i leith truaillithe, idircheaptha agus i leith leasuithe neamhúdaraithe. Séanann Uisce Éireann aon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo nó as aon dochar do chórais na bhfaighteoirí déanta ag an teachtaireacht seo nó ag a ceangaltáin tar éis a sheolta. Tabhair faoi deara go bhféadfadh monatóireacht a bheith á dhéanamh ar theachtaireachtaí chuig Uisce Éireann agus ó Uisce Éireann d'fhonn ár ngnó a chosaint agus chun a chinntiú go bhfuiltear ag teacht le beartais agus le caighdeáin Uisce Éireann. Is cuideachta gníomhaíochta ainmnithe é Uisce Éireann atá faoi theorainn scaireanna, a bunaíodh de bhun fhorálacha na n-Achtanna um Sheirbhísí Uisce 2007-2022, a bhfuil a bpríomh-ionad gnó ag Teach Colvill, 24-26 Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.

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https://mail.google.com/mail/u/0/?ik=f8106b359f&view=pt&search=all&permmsgid=msg-f:1861257638518312058&simpl=msg-f:18612576385... 1/2

Thank you for your attention.

Matthew Holloway <matthewh@noriker.co.uk>

Uisce Éireann assessment of Knockraha BESS

Matthew Holloway <matthewh@noriker.co.uk> 16 April 2026 at 08:08
To: John MacCarthy <john.maccarthy@water.ie>
Cc: Alfie Chambers <alfiec@noriker.co.uk>

Good morning John,

Thank you for your enquiry regarding the Knockraha BESS project.

To clarify our design for your assessment, the proposed development does not require a connection to the Uisce Éireann public water network. As stated in our application form, the project is designed so that it does not require a connection to the public network or public sewer.

Instead, our site will have initial supply via tanker and have on-site measures for water disposal. The following identifies specific areas of the site related to water supply and retention.

- Fire Water Reservoir: A one-off fill by a specialist supply company during the commissioning phase, with periodic top-ups as required by a fire safety, utilizing water tankers. The reservoir's design will ensure that the minimum specified volumes are maintained at all times.
- Welfare centre: A modular system for domestic water and wastewater, serviced by a third party specialist contractor. The specific location for this will be determined in final detailed design of the welfare facility.
- Fire Water Retention: Our design includes a dedicated containment strategy, ensuring that any firewater runoff is managed on-site and does not impact local drainage or Uisce Éireann assets. Details of retention can be found in Appendix 9: Flood Risk Assessment.

Specific arrangements and contracts will be confirmed with specialist third-party contractors once the project has achieved certain milestones that warrant their commitment.

I therefore hope our response adequately addresses your enquiry. I would be happy to discuss this further to see if this clarifies your assessment or if you require more specific details for your enquiry.

Kind regards,

Matthew

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[Quoted text hidden]

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Imperial Square, Cheltenham,
GL50 1PZ

Tel: +44 1242 500254
Email: info@noriker.co.uk