

Our Case Number: ACP-324082-26

Your Reference: Drumkee LCIS Ltd



An
Coimisiún
Pleanála

Rowan Engineering Consultants Ltd
Unit 1
Scurlockstown Business Park
Trim
Co. Meath

Date: 21 September 2026

Re: The proposed development will consist of a 10-year planning permission for the construction of 1 Battery Energy Storage System, 1 110kV AIS electrical substation building and 1 single-storey customer substation building and all associated infrastructure located at Ballynanelagh, Kockraha, Co. Cork. (www.drumkeelcis.com)

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer further to the above mentioned proposed development which is before the Commission for consideration.

Please be advised that the Commission, in accordance with section 182A(5)(a) of the Planning and Development Act 2000, as amended, hereby requires you to furnish the following further information in relation to the effects on the environment of the proposed development:

1. The Coimisiún notes that the survey work carried out to inform the submitted Ecological Impact Assessment exceeds the recommended survey lifespan set out in the CIEEM Advice Note 'Lifespan of Ecological Reports and Surveys' (2019). The applicant is requested to review the Ecological Impact Assessment and submit additional survey data or justification on the sufficiency of the information provided in order to comply with the aforementioned guidelines.
2. The applicant is requested to provide clarification in relation to the specific design, battery chemistry and specifications of the proposed Battery Energy Storage System (BESS) development and supporting infrastructure.
3. The Applicant is requested to provide further information in relation to the fire risk strategy for the site including the following:

Tell
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(01) 858 8100
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64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

a) The applicant is required to submit a Fire Risk Management Plan (FRMP). The FRMP should be prepared by a suitably qualified technical expert / advisor and set out preventative measures for potential causes of fire hazard and evaluate the associated risk of same. It should also include specific measures to reduce the risk of a fire occurring onsite including, for example, the safe storage and maintenance of flammable substances and materials, the intended method(s) of extinguishment, and the installation of fire safety equipment and apparatus (fire alarms, detection systems, methods of suppression, etc.). The FRMP should explicitly demonstrate how the potential risk of a fire occurring on the site would be addressed and minimised.

b) The applicant is required to submit an Emergency Response Plan (ERP). The ERP should be prepared by a suitably qualified technical expert / advisor. It should outline a reactive strategy with clear procedures to follow in the event of a fire, detailing the specific actions the facility operator must take to respond quickly and effectively in the event of fire or similar emergency.

4. Further detail is required in respect of Firefighting water/Fire water Storage, including:

(i) Notwithstanding the applicant's proposal for a firewater reservoir to retain 500,000 litres of water for use in a fire event. The applicant is required to provide confirmation of how firefighting water will be sourced and/or retained within the proposed development site particularly during the summer months and periods of drought conditions. The quantity of firewater storage should be in line with the UK National Fire Chief's Council (NFCC) Grid Scale Battery Energy Storage System Planning – Guidance for the FRS (Fire & Rescue Services), which states that provision should be made for BESS units to provide 1,500 litres of water per minute for 2 hours, as a minimum unless it can be demonstrated that another amount is appropriate. Revised drawings and necessary agreements be provided to demonstrate feasibility of same.

(ii) A detailed methodology for fire water storage management along with any proposed mitigation measures (e.g. Drainage systems, interceptors, bunded lagoons, etc). Such measures shall be included in the ERP, as referred to in Item 3 (b).

(iii) Having regard to the need for large quantities of water in the event of a fire, the potential impacts and effects of contaminated fire water run-off on ground and surface water bodies requires full consideration in both the planning and ecological assessments, and in the AA Screening and, if determined to be required, a Natura Impact Statement (NIS).

5. The applicant shall submit a Surface Water Drainage Plan for the application site which addresses the following:

a) The plan shall include drainage proposals designed to manage rainfall runoff and fire water runoff, with associated calculations to be informed by the anticipated fire water requirements from the proposed development.

b) Drainage proposals shall include details to demonstrate that suitable catchment, containment, monitoring and on-site treatment measures would be in place for firewater runoff and other potential firefighting substances (such as foam) and details of any mitigation necessary to ensure that there will be no contamination or impacts on surface or groundwater from firewater and that consideration has been given to any potential downstream and/or drinking water abstraction impacts.

c) Considers the proposal in accordance with the objectives of the Water Framework Directive.

6. The contents and conclusion of the submitted Landscape and Visual Impact Assessment (LVIA) are noted. However, the Coimisiún has concerns that the cumulative visual impact from other energy infrastructure developments permitted/proposed in the study area has not been sufficiently demonstrated in the LVIA photomontages for the Coimisiún to make an informed assessment. The applicant is therefore requested to submit a revised Landscape and Visual Impact Assessment to include the following:

a) further viewpoints to the north and northwest of the application site and considerations from any high vantage points in the wider landscape.

b) photomontage imagery shall demonstrate the potential visual impact associated with the cumulative effect of other proposed/permitted energy infrastructure developments.

7. The applicant is requested to undertake a fire/explosion modelling exercise to determine the likely risk of explosion and any consequential impacts, given the significant electrical/grid infrastructure in close proximity to the application site. This should include a base map indicating dispersion modelling of fumes from a fire event and presentation of the findings on a risk contours map in accordance with HAS Guidance, to determine if there are any predicated off-site impacts.

8. The applicant is also invited to submit any other plans/drawings, assessments and reports or updates that:

(i) reflect any changes resulting from a response to the items of further information.

(ii) reflect any change in the pattern of development in the vicinity of the site since the lodgement of the application and cumulative impacts in terms of noise, traffic and air quality.

In responding to Items above, the applicant should be cognisant of the following:

• For Battery Energy Storage Systems (BESS), a key environmental consideration during a thermal runaway fire event is the run-off of fire water into surface and groundwater networks. The EPA's Guidance on Retention Requirements for Firewater Run-off defines "firewater" as the liquid that arises from water, foam, rainwater or other substances that have been used for firefighting purposes, and are therefore likely to contain polluting matter, particularly arising from them having come into contact with combustion products. The Guidelines also outline that firewater arising from a fire incident typically contains high concentrations

of substances which are harmful to the aquatic environment, and if it is allowed to enter into soil, drains or watercourses in an uncontrolled manner, it has the potential to cause significant environmental damage.

The further information referred to above should be received by the Commission within 3 months from the date of this notice (i.e. no later than the **21st of December 2026**).

In this regard, please submit 1 hard copy and 1 electronic copy of the above information.

Please note that following its examination of any information lodged in response to this request for additional information, the Commission will then decide whether or not to invoke its powers under section 182A(8)(a) of the Planning and Development Act 2000, as amended, requiring you to publish notice of the furnishing of any additional information and to allow for inspection or purchase of same and the making of further written submissions in relation to same to the Commission.

If you have any queries in the meantime, please contact the undersigned officer of the Commission or email sids@pleanala.ie quoting the above mentioned An Coimisiún Pleanála reference number in any correspondence with the Commission.

Yours faithfully,

PP A. H
Honor Caird Marren
Executive Officer
Direct Line: 01-8049315

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