

**ROAD L6989 RESIDENTS ASSOCIATION  
KNOCKRAHA CO CORK**

Secretary: Noelle Murphy Killeena, Knockraha, Co.Cork

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The Secretary,  
An Coimisiún Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902,

23<sup>rd</sup> March 2026

C/o Noelle Murphy  
Secretary  
'Hillside'  
Killeena,  
Knockraha,  
Co. Cork.

AN COIMISIÚN PLEANÁLA	
LDG-	084151-26
ACP-	
30 MAR 2026	
Fee: €	50
Time:	9:15
	reg post

**Case Reference: VA04.324082**

**The proposed development consisting of a 10 year planning permission for construction of 1 Battery Energy Storage System, 1 110kv AIS electrical substation building and 1 single storey customer substation building**

We the residents of road L6989 incorporating the townlands of Killeena, Ballynanelagh and Maryville, Knockraha wish to make the following observations in relation to the above application.

Please find enclosed fee of €50.

Initially, we would like to outline that Drumkee LCIS Ltd has made no contact with the local residents or the Knockraha Community Association who represent the wider community to outline their plans or listen to any concerns which we may have in connection with this development.

We understand and appreciate that the need for renewable energy and energy storage facilities is critical at the present time but as nearby residents, we have concerns regarding the safety surrounding a large-scale BESS on our rural road L6989 in Knockraha. The information provided in this application does not address or alleviate our concerns.

## **FIRE RISK**

A comprehensive Fire Safety Review report was submitted by ORS. They outline (P6 No.5) that this proposed BESS is classed as a Purpose Group 6(b) Industrial High Hazard and a place of special fire risk in line with the definition of TGD-B, VI 2024.

They were unable to attest to the actual Safety of this BESS facility as no details of the Battery containers were provided to them. They identified several areas where the application fell short of NFPA 855 Safety standards viz- separation distances of BESS units, limited container ventilation, absence of confirmed explosion-relief features; unclear thermal runaway monitoring capability and an absence of annunciation, shutdown and isolation arrangements; concern regarding the site's single access route; hedgerow obstructions, undefined hard standing areas and a lack of a pre-incident plan.

ORS also identified the following BESS Hazards; Thermal runaway, Toxic off-gassing, reignition of prolonged burning, explosion hazards.

In relation to Thermal runaway, it appears for the site lay-out map 3.5 that the containers are in 32 pairs (two containers appear to be joined together) with a distance of 3m between each pair. NFPA 855 minimum safety criteria is 3m between each container and ideally 6m.

Prolonged burning is common with some fire events requiring cooling and water application over many hours. Drumkee's proposed solution of a firewater reservoir which will be filled with 500,000 litres of rainwater (approx. 2 hours of water in the event of fire) we feel is inadequate. No details are provided as to how it is proposed to keep the reservoir filled during summer months. The fire at the battery compound in Claregalway in 2024 necessitated the attendance of fire services for three days and resulted in the evacuation of school and residences. ORS recommends fire -hydrants near this reservoir but these are not identified in the plans submitted.

According to the Environmental and Planning report (P.34) the majority of the site location falls with an area of Extreme Groundwater Vulnerability. All of the dwellings in the vicinity of this site have groundwater wells as there is not mains water in the area. We have concerns that in the event of fire, the runoff water could pose a significant risk to groundwater contamination and the source of our well water.

ORS recommends that Cork County Council Fire Authority should be consulted during the design development but there is nothing to indicate that this has been or will be done.

## **NOISE**

In evaluating the Cumulative Noise Impact Assessment, Enfonc has not considered the modifications to the existing 220kv ESB substation or work associated with the Celtic

Interconnector (P22-7.2) saying that it was present during the baseline noise survey and forms part of the existing ambient noise. This is not correct. While the engineering works – which includes 400kv and 220kv air insulated (AIS) equipment, four 400/220kv transformers (three operational and one spare) are ongoing and almost complete, the increased electrical equipment associated with the 220kv ESB substation and the Celtic Interconnector is not likely to be commissioned until 2027.

In light of this we request that a revised Noise survey report be completed to take account of the additional infrastructure. We request that a decibel level be attributed to these additional installations as opposed to observations of insignificant, not be materially significant, not significant in terms of noise – P22/23. All these insignificant noises added together are not quantifiable in this report but the decibel level could well have an effect on the overall cumulative noise level.

This is a rural community with many of the residents retired. Construction noise will affect the local community and we are requesting that working hours be from 08.00hrs as opposed to 07.00hrs to take account of the rural aspect of the development and respect for the local neighbours.

### **ROAD NETWORK**

HGV traffic from both Ballyvatta substation and Drumkee Battery site will be using this same access track from their respective sites onto L6989 and quite possibly at the same time. This could also coincide with HGV traffic from the approved Killeena Energy Synchronous Compensator and Neon Battery Facility which is presently being considered by An Coimisiún Pleanála. We feel that the existing road network will not be able to absorb this increase in HGV construction traffic. Most of the road measures 3.5m and 4m and only one vehicle at a time can pass.

It is obvious from the extensive 'Construction Management Traffic' Plan submitted that Drumkee is conscious of the traffic hazards associated with this development. Without significant road widening works being carried out, we feel that the mitigation measures proposed by them are not sufficient to ensure the safety of pedestrians, cyclists & other road users.

The proposal to erect temporary barriers or delineators along the verge to safeguard the safety of pedestrians/cyclists (4.7) is not feasible as this is a soft (mucky) grassy verge & unsuitable for either.

It is stated (3.5) that on-site parking will be provided where practicable to accommodate the majority of construction and staff vehicles. It is proposed (4.6) that there will be a holding area within the site boundary for vehicles waiting to unload and a remote holding area. Details of this on-site parking nor the remote holding area have not been included with the planning application.

We are requesting that in the interest of safety, planning should only be approved if Cork County Council are willing, perhaps in conjunction with the developer to widen road L6989

and install a designated footpath along the grass verge. There are a number of young children on the eastern side of L6989 and their safety should not be compromised.

In relation to the proposed Construction Haulage route via Pigeon Hill to the site at Ballynanelagh, what assurances can be given that the proposed haulage route will be adhered to. We as residents have already experienced non-adherence to this very proposal. A condition imposed by Cork County Council in previous Plannings in relation to Construction Haulage route was breached which necessitated us to commence Enforcement proceedings with Cork County Council.

The proposal to have a traffic Marshall at the site entrance did not work in previous projects and we humbly propose that the Traffic Marshall should be positioned at the western side of the L6989 at the junction with Ballinagoul Cross to prevent any Haulage traffic from traversing the L6989 from the wrong direction.

In their application letter for planning dated 16/2/26, Drumkee's response to point 8 is unclear as it does not appear to categorically give them permission to access their site, but their ongoing discussion has allowed for potential joint development to use the access road from L6989. In addition, the planning notice is placed at a gateway approx. 50m east of the proposed entrance which gives the impression that an alternative entrance will be used.

## **CONCLUSION**

As previously stated the residents of L6989 are not objecting to this development but we need to be assured that proper protections are in place for our future safety. We would welcome confirmation from Cork County Council Fire Authority that the local residents will not be at risk in the event of an incident at this development.

Yours sincerely,



Noelle Murphy

Secretary