

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

31st March 2026

Noelle Murphy,
Killeena,
Knockraha
Co.Cork

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

Dear Sir/Madam,

I would like to make the following observation in relation to Case Reference No. VA04.324082 on the following grounds

ENVIRONMENTAL CONCERNS

What is the environmental impact of the proposed fire water reservoirs? Considering that a local home west of the site was flooded in Oct 2023 following a day of heavy rains, it comes with some concerns that a reservoir pond filled with 500,000 ltrs stands at the top of the hill.

NOISE

In evaluating the Cumulative Noise Impact Assessment, Enfonic has not considered the modifications to the existing 220kv ESB substation or work associated with the Celtic Interconnector (P22-7.2) in their report. While the engineering works are ongoing as I write this and are almost complete, the increased electrical equipment associated with the 220kv ESB substation and the Celtic Interconnector is not likely to be commissioned until 2027. So, the Enfonic report does not take into account this load to the cumulative noise impact.

FIRE

As everyone is aware, fire is the biggest risk factor for any BESS facility. ORS in their report has identified this proposed project as 'Industrial High Hazard and a place of special fire risk'. As a nearby resident this is hugely concerning.

Prolonged burning is common with some BESS 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) is inadequate. According to the UK National Fire Chiefs council (NFCC) Grid Scale Battery Energy Storage Systems Planning – Guidance for FRS (Fire & Rescue Services) states that provision should be made for BESS units to provide 1,900 litres of water per minute for 2 hours as a minimum. Considering that BESS fires can last days, I would like to know where all the water for Fire will be ascertained. There are no public water mains on the road L6989.

No details are provided as to how it is proposed to keep the reservoir filled during summer months.

ORS recommends fire -hydrants near this reservoir but these are not identified in the plans submitted.

ZONING

This land is zoned Metropolitan Greenbelt. I would like to know how planning is granted to an industrial facility without the lands been re-zoned.

It is somewhat concerning that a local farmers daughter was turned down for planning to build a dwelling on the grounds that

'Having regard to the existing pattern of development in this rural area the proposed development would give rise to ribbon development and would materially contravene Objective RP 5-24 of the Cork County Development Plan 2022 and the Sustainable Rural Housing Guidelines 2005.'

So, a local resident cannot build a home on their own land but a private developer can put an industrial facility on lands which are of the same zoning.

Yours sincerely



Noelle Murphy