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Réigiúnach Deisceart  
An tOspidéal Súl, Cluas agus Scornaí,  
Bóthar an Iarthair,  
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**EHIS Reference No: 572**

**Date: 26.02.2026**

A Chara

Thank you for the opportunity to comment on this application.

Due to resource constraints, Emergency Management is not in a position to provide a bespoke response to individual applications.

Under Section 7(1) of the Health Act, 2004, the HSE is charged with using the resources available to it *'in the most beneficial, effective and efficient manner to improve, promote and protect the health and welfare of the public'*. It is within this context, that the below emergency planning comments are provided.

At a strategic level, the following should be considered during the planning application process:

1. Impact upon access to health service facilities during construction and operation.
2. The availability of health services within the area for the population increase during construction, and, if applicable, operation of the development.
3. Impact upon health service delivery in the area during construction of the development, especially any traffic restrictions.
4. Location of Upper and Lower Tier COMAH sites within the area, including any "area in which people may be affected", as defined by the Central Competent Authority (i.e.; the Health and Safety Authority).
5. Any enhancement that the development offers to increase resilience of, or protection to, critical infrastructure.
6. Any existing, or potential designation of the development under European Union (Resilience of Critical Entities) Regulation 2024 – SI 559 of 2024

Before a new development becomes operational, a suitable emergency plan should be developed for the site, in line with relevant legislation. More information on 'Emergency Plans' for specific industries can be found on [www.hsa.ie](http://www.hsa.ie)

If a developer / operator wishes to liaise directly with the Health Service Executive (HSE) regarding a specific risk impacting upon population health and/ or health service delivery, then please contact the appropriate HSE Emergency Management Office. [Click Here for contact details](#)

**David O'Sullivan**  
Chief Emergency Management Officer – HSE SOUTH



Seirbhís Slainte  
Níos Fear  
á Forbairt

Building a  
Better Health  
Service



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### **National Environmental Health Service Submission Report**

***(as a Statutory Consultee under the Planning and Development Acts 2000 (as amended) & Regulations made thereunder)***

**Date:** 1<sup>st</sup> April 2026

**Type of consultation:** Strategic Infrastructure Development (SID)

**Application Reference Number:** VA04.324082

**EHIS Reference number:** 5722

**Applicant:** Drumkee LCIS Ltd

**Proposed Development:** Knockraha Battery Energy Storage System (BESS), Co. Cork.

Dear Sir/Madam

Please find below the HSE submission report in relation to the above proposal.

The following HSE departments were made aware of the consultation request for the proposed development on 24<sup>th</sup> February 2026:

- HSE South Emergency Management – David O'Sullivan
- National Capital Estates Office – Regional AND
- Director of National Health Protection – Eamonn O'Moore/Ina Kelly
- REO South West – Andy Phillips

#### **1. Introduction**

The HSE has reviewed the available documentation for the proposed Battery Energy Storage System (BESS) at Knockraha, Co. Cork.

The development includes battery storage units, substations, firewater storage, drainage and associated infrastructure on a site of approximately 2 hectares, with a lifespan of around 35 years.

#### **2. Environmental Assessment Context**

The National Environmental Health Service (NEHS) submission is based on a review of the Environmental Impact Assessment Screening Report, Construction & Operational Environmental Management Plan, Cumulative Impact Assessment Report, Noise Impact Assessment and other supporting technical documents. All mitigation measures and commitments set out in the application documents have been taken as read and accurate. No independent sampling was undertaken by the HSE.

This submission focuses solely on environmental health considerations and identifies areas where further information or clarification may be beneficial. The NEHS has made observations in the following areas:

- Public Consultation and Community Engagement
- Population and Human Health
- Noise and Vibration
- Water (Hydrology and Hydrogeology)
- Fire Detention and Prevention System
- Air Quality
- Major Accident Risk
- Land and Soils
- Traffic and access
- Lighting and Security
- Site Facilities (Water Supply and Sanitary Provision)

### **3. Local Environmental Health Input**

**The following observations were provided by the local Environmental Health Office:**

The following observations were provided by the local Environmental Health Office:

- Sensitive receptors:  
The nearest house is approximately 200m from the site. There are no schools, healthcare facilities, sports grounds or food premises in the immediate vicinity.
- Water environment:  
There are no evident streams, rivers or lakes nearby based on available mapping. The NEHS is not aware of any private wells in the area.
- Nearby infrastructure:  
An existing EirGrid substation is located directly adjacent to the proposed site.
- Complaints history:  
No complaints have been received by NEHS in relation to this site or associated activities.
- Access roads:  
The surrounding roads are narrow rural roads, which may have implications during construction.
- Planning context:  
The NEHS is not aware of any recent planning permissions granted or refused in the immediate area.
- Local concerns:  
No direct concerns have been raised with NEHS; however, there has been media reporting of local objections (Irish Examiner, 2024).

### **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.

### **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.

### **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.

## **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.

## **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.

## **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.

## **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.

## **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.

**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.

**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.

**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.

**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.

If you have any queries regarding this submission, the initial contact is, Kathleen Clifford, Principal Environmental Health Officer who will refer your query to the appropriate person.

Yours sincerely

Marisol Gonzalez Troya

Marisol Gonzalez Troya  
Network Support Unit Member

***The Health Service Executive is continually striving to improve the quality of its service. If you have any feedback on your recent interaction with the National Environmental Health Service please contact the Principal Environmental Health Officer on the above phone number.***