Martin and Deidre Fitzgerald,
Carriganassa,
Inch,
Killeagh,
Co. Cork
30th October 2026

To: The Secretary, An Coimisiun Pleanala, 64 Marlborough Street, Dublin 1, D01 V902
RE: OBSERVATION ON STRATEGIC INFRASTRUCTURE DEVELOPMENT - CASE REFERENCE VA04.324632
Applicant: Perigus Energy Ireland Midco Ltd
Proposed Development: 220kV Air Insulated Substation, loop-in grid connection and related works
Location: Ballyneague, Ballydaniel and Knocknagappagh, County Cork

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We object to this application and ask the Planning Authority to refuse permission. Our home and farm is in close approximately to the proposed battery compound, substation and associated works. Our concerns relate to public safety, emergency response capability and environmental protection. We are not in a position to comment on the technical adequacy of documents as we have not been able to fully examine within the seven-week period, and our objection is accordingly framed as matters the Authority should satisfy itself upon before determining this application.

1. Fire and explosion risk is materially different from that of a solar farm

Lithium-ion battery storage carries a risk of thermal runaway: a self-sustaining, self-oxidising reaction that cannot be extinguished by conventional means and which vents flammable and toxic gases, including hydrogen fluoride, carbon monoxide and hydrogen. Vented gas can accumulate and deflagrate. This is a distinct industrial hazard and it should not be assessed as an incidental part of a renewable energy proposal. Given these risks, what are the safety implications of co-locating a large-scale lithium-ion battery storage facility alongside a 220kV electricity substation, particularly where both are situated adjacent to an evergreen forestry? Has the cumulative risk of fire, explosion, toxic gas release and potential escalation between the battery installation and substation been adequately assessed?

2. The benchmark against which the application should be measured

There is no dedicated Irish national planning guidance for grid-scale battery storage. The most comprehensive published guidance is that of the UK National Fire Chiefs Council, "Grid scale energy storage system planning – Guidance for fire and rescue services", approved for publication in December 2025 and replacing the earlier 2023 version. It is not binding in this jurisdiction, but it represents current best practice and I ask the Authority to have regard to it. Among other things it advises an initial minimum distance of 30 metres between battery cabinets or associated infrastructure such as transformers and switchgear and occupied buildings, before any mitigation such as blast walls; that the developer produce a plan identifying all sensitive receptors within a 1 kilometre radius, marked with a compass rose showing prevailing wind direction; that areas within 3 metres of cabinets be kept clear of combustible vegetation; and that vertical stacking of units is not supported.

We ask the Authority to consider whether the proposed BESS and 220kV substation adequately address fire, explosion and toxic gas risks, particularly given the adjoining highly combustible evergreen forestry. The application maps do not appear to identify sensitive receptors or adequately demonstrate the potential cumulative risks arising from the close proximity of the battery installation, high-voltage substation and forestry. Has this been properly assessed, including the potential for fire escalation between these facilities?

3. Matters the Authority should require to be demonstrated

On the documents publicly available, we are not satisfied that the following have been demonstrated, and we ask that the application not be determined until they are:

(a) The measured separation between the substation, battery compound and the nearest occupied dwellings and the site boundary, and whether the 30 metre initial minimum is achieved.

(b) A sensitive receptor plan to 1 kilometre, identifying dwellings, watercourses, private wells and groundwater, and an analysis of prevailing wind direction relative to those receptors.

(c) Water supply for firefighting. NFCC guidance indicates hydrant flow of not less than 25 litres per second, or, where that cannot be achieved, an equivalent static on-site supply sustaining that rate for 120 minutes, approximately 180,000 litres. In a rural location this cannot be assumed and should be evidenced, not conditioned.

(d) Containment of contaminated firewater. Water used for boundary cooling will carry heavy metals, fluoride compounds and electrolyte residues. Its containment, testing, removal and lawful disposal should be specified for the operational phase, not merely the construction phase, and the receiving watercourses and any private wells at risk should be identified.

(e) A site-specific Emergency Response Plan agreed in writing with Cork County Fire Service, addressing the manufacturer's recommended tactic, deflagration venting, toxic gas plume behaviour, evacuation distances for neighbouring residents, and the resources and response time realistically available from the nearest station.

(f) Appliance access and turning provision, and confirmation that the Chief Fire Officer has been consulted and has reported on the application.

(g) Financial security for decommissioning and for site remediation following any incident.

4. These are matters for the planning stage

Several of the above go to the principle of whether this site is suitable for this use at all. If they are deferred to pre-commencement conditions, neither the Authority nor the public will ever see the assessment, and the opportunity to scrutinise it will have been lost. We respectfully submit that they must be resolved before a decision is made.

Relief sought

We ask that permission be refused. In the alternative, we ask that the Authority seek Further Information on each of the matters at paragraph 3, obtain a written report from the Chief Fire Officer, and re-advertise so that the public may comment on the response.

Yours sincerely,

Martin and Deidre Fitzgerald