

ENVIRONMENTAL IMPACT ASSESSMENT REPORT (EIAR) FOR THE PROPOSED COOM GREEN ENERGY PARK GRID CONNECTION

PLANNING STATEMENT

Prepared for:

Coom Green Energy Park Limited



Date: April 2026

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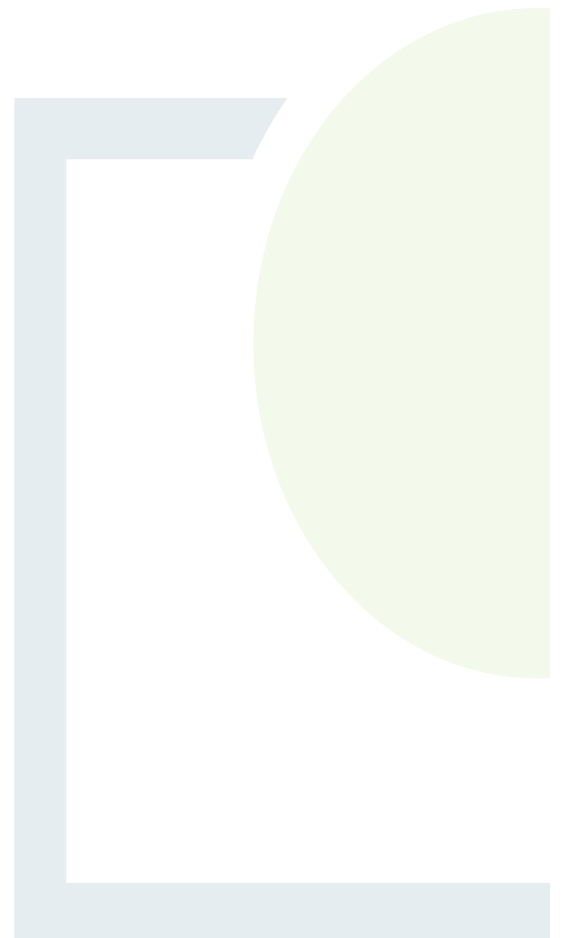
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Planning Statement for construction of a Grid Connection Route for Coom Green Energy Park, Co. Cork

REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

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Abstract: Fehily Timoney and Company is pleased to submit this planning statement which sets out a description of the Proposed Development comprising a 110kV Grid Connection Route (GCR), a 33kV Collector Network Route (CNR), and an onsite 110kV substation traversing various townlands in County Cork. The proposed underground electrical cables and substation will connect the permitted Coom Green Energy Park (CGEP) to the national grid at the existing Barrymore 110kV substation near Rathcormac. The primary wind farm component was approved by An Coimisiún Pleanála (ACP Ref: 308885), with the 110kV infrastructure component subject to a planning application to An Coimisiún Pleanála as Strategic Infrastructure under Section 182A, and the 33kV interconnector subject to a separate planning application to Cork County Council.

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1. INTRODUCTION

1.1 Background

Fehily Timoney and Company (FT) has prepared a Planning Statement on behalf of Coom Green Energy Park Limited for the purpose of a planning application for a 110kV Grid Connection Route (GCR), a 33kV Collector Network Route (CNR), and an onsite 110kV substation. The purpose of this infrastructure is to allow for the export of energy from the permitted Coom Green Energy Park (CGEP) to the national grid at the existing Barrymore 110kV substation near Rathcormac, Co. Cork.

CGEP is a permitted renewable energy development (ACP Ref: 04.308885) consisting of a 22-turbine wind farm, a 110kV substation, battery energy storage system (BESS), and all associated ancillary works. Two 110kV substations were originally permitted as part of the CGEP, however, if the Proposed Development receives planning consent, only the substation located in Lackendarragh North will be constructed, and the permitted substation at Mullenaboree will no longer be required.

The 110kV infrastructure has been determined to be Strategic Infrastructure Development (SID) pursuant to Section 182A of the Planning and Development Act 2000 (as amended) and will therefore be submitted to An Coimisiún Pleanála. The 33kV CNR application will be made directly to Cork County Council under the provisions of Section 34 of the Planning and Development Act 2000 (as amended).

The application to Cork County Council for the 33kV infrastructure is covered by the provisions of the Renewable Energy Directive III (Directive (EU) 2023/2413) and it is important to note that the planning application may be subject to section 34D of the Planning and Development Act 2000.

This Planning Statement fulfils the requirement for a Renewable Energy Designation Policy Statement and provides clear justification of the policy context for the proposed development as required to demonstrate the Completeness of the application.

However, it is important to note that the 110kV infrastructure, by reason of it falling within Section 182E of the Planning and Development Act 2000 does not fall under the provisions of the RED III Directive.

1.2 The Applicant

The application for the Proposed Development is being made by Coom Green Energy Park Limited, hereafter referred to as "*the Applicant*". Coom Green Energy Park Limited is a joint venture company between Orsted and FuturEnergy Ireland. Orsted is a multinational renewable energy company that develops, acquires, builds, and operates utility-scale renewable energy projects. FuturEnergy Ireland is a joint venture company between Coillte and ESB. As the custodian of 7% of Ireland's land, Coillte plays a critical role in tackling climate change, while ESB is furthering its investment in and commitment to onshore wind generation in Ireland to power societies into the future.



1.3 Development Location and Context

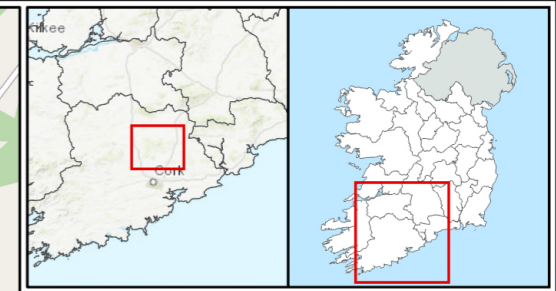
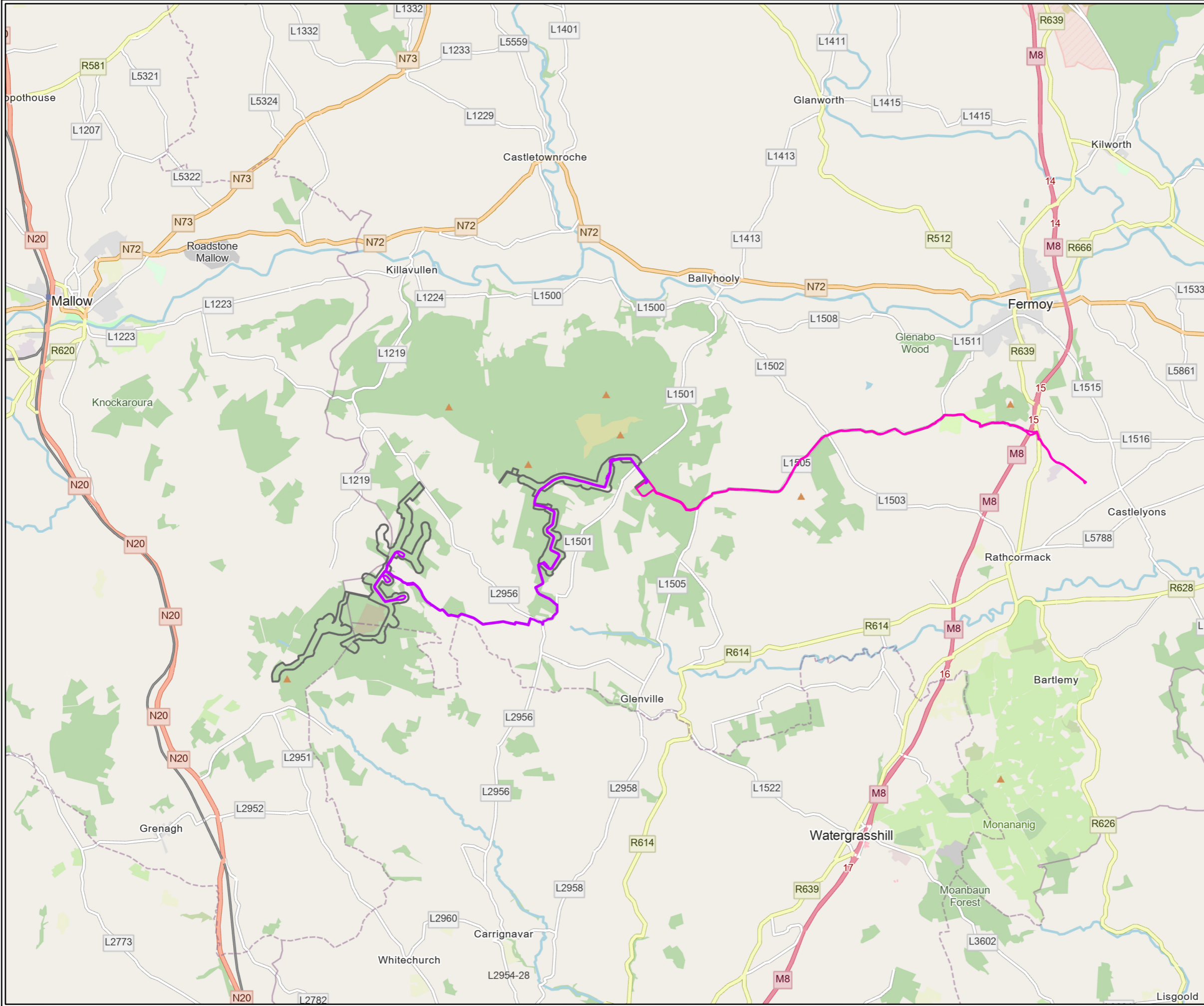
The Proposed Development is located within the jurisdiction of Cork County Council, approximately 12 km to the southeast of Mallow and approximately 13 km west of Fermoy in County Cork. The application area comprises a total land boundary of 57.6 ha (0.58 km²). The route of the proposed cabling consists of two primary networks connecting the arrays to the onsite substation, and the onsite substation to the national grid, as detailed in Table 1-1 below.

Table 1-1: Cable Route Sections

Section	Description
Section 1: 110kV Underground Cable (UGC) Grid Connection Route (GCR)	Total of c. 13.9 km routing from the proposed Lackendarragh North substation to the existing Barrymore 110kV substation. This comprises c. 12.1 km to be constructed within the existing public road corridor and c. 1.8 km constructed within private lands.
Section 2: 33kV Underground Cable (UGC) Collector Network Route (CNR)	Total of c. 15.8 km traversing from the western wind parcel of the permitted CGEP to the permitted substation at Lackendarragh North. This comprises c. 1.1 km located within public roads and c. 14.7 km located within third-party/private lands.

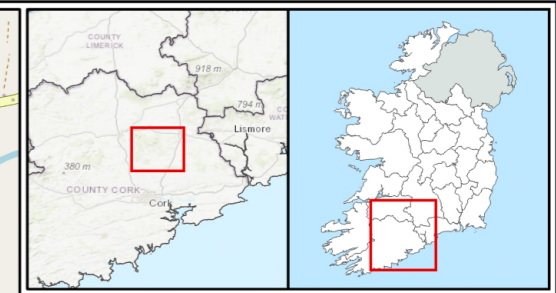
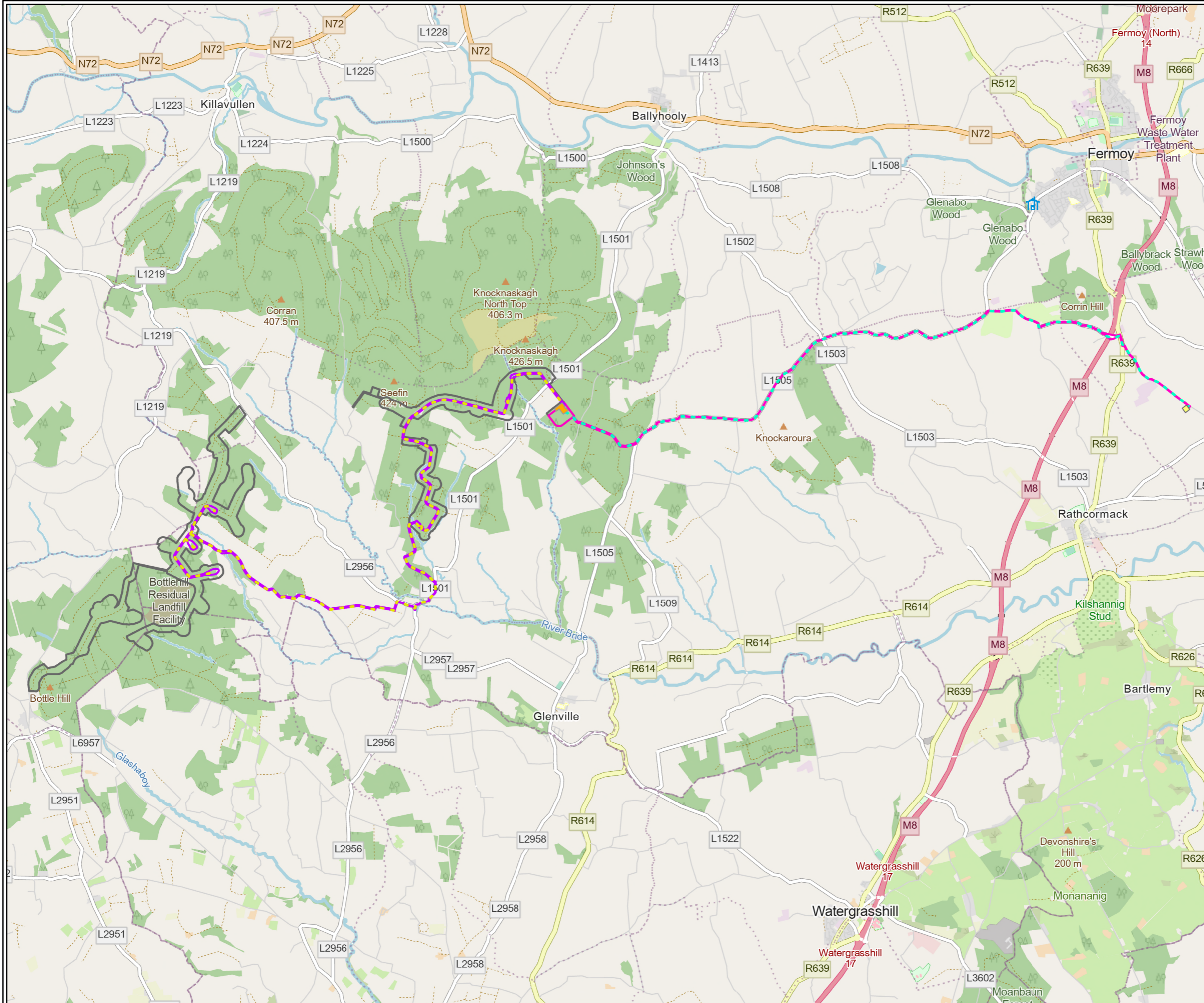
The lands within the vicinity of the Proposed Development are located in a sparsely populated rural context, with the onsite 110kV substation situated 600 m from the nearest residential property. The landcover is predominantly agricultural, classified as pastures, coniferous forest, and transitional woodland scrub.

Control measures for construction activity will be put in place in line with the Construction and Environmental Management Plan (CEMP). A Traffic Management Plan (TMP) will be adopted in consultation with Cork County Council. Further information can be found in the Environmental Impact Assessment Report (EIAR).



- Legend**
- 110 kV Site Boundary
 - 33 kV Site Boundary
 - CGEP Consented Development Boundary

TITLE:	Site Location		
PROJECT:	Coom Green Energy Park Grid Connection		
FIGURE NO:	1.1		
CLIENT:	Coom Green Energy Ltd.		
SCALE:	1:100,000	REVISION:	0
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- Legend**
- 110 kV Site Boundary
 - 33 kV Site Boundary
 - CGEP Consented Development Boundary
 - Proposed 110 kV Substation at Lackendarragh North
 - Existing Barrymore 110kV Substation
 - Proposed 110 kV Grid Connection Route
 - Proposed 33 kV Collector Network Route

TITLE:	Site Layout
PROJECT:	Coom Green Energy Park Grid Connection
FIGURE NO.:	1.2
CLIENT:	Coom Green Energy Ltd.
SCALE:	1:70,000
REVISION:	0
DATE:	28/04/2026
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2. PROPOSED DEVELOPMENT

2.1 Detailed Description

The laying of underground cables within public roads has become common practice for renewable energy projects, and issues and construction methods are well understood. The accompanying drawings and Construction Methodology Report have been prepared by TLI. This document sets out details of the underground cable connection construction works.

The total application area of the proposed works is 57.6 ha.

The proposed 110 kV Grid Connection Route (GCR) is approximately 13.9 km in length, with 12.1 km to be constructed within the existing public road corridor and 1.8 km constructed within private lands. This application also consists of the proposed 110kV electrical substation at Lackendarragh North and associated compound. The grid connection will allow for the export of electricity to the existing Barrymore 110kV substation located near Rathcormac, Co. Cork. This application will be made directly to ACP.

The 33 kV Collector Network Route (CNR) is approximately 15.8 km in length, comprising 14.7 km located within third-party lands and 1.1 km within public roads. The underground cables will consist of a 33 kV CNR between the western and eastern arrays of the permitted Coom Green Energy Park (CGEP) development and will connect to the proposed 110kV substation at Lackendarragh North which is the subject of SID application.

Further information on the Proposed Development can be found in Chapter 2, Volume 2 of the EIAR.



3. EIA & RED III

3.1 Requirement for EIA.

This Section reviews the Proposed Development against the Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment as amended by Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 – “The EIA Directive” and its requirements as transposed into Irish law.

Schedule 5, Part 2 (3)(i) of the Planning and Development Regulations 2001 (as amended) “Planning Regulations” refers to:

“Installations for the harnessing of wind power for energy production (wind farms) with more than 5 turbines or having a total output greater than 5 megawatts”.

Whilst the proposed development does not propose the installation of wind power with more than 5 turbines or having a total output greater than 5 megawatts, the project is functionally interdependent with the Coom Green Energy Park which consists of 22 no. wind turbines permitted by ACP pursuant to ACP Ref. PA04. 308885. Therefore pursuant to *O’Grianna & Ors -v- An Bord Pleanála [2014] IEHC 632* and Environmental Impact Assessment Report (EIAR) is submitted with this application for permission. The *EIAR considers the electrical infrastructure work, the subject of this application cumulatively with the permitted wind farm which was itself subject to its own EIAR.*

3.2 RED III Completeness Check

The application to Cork County Council for the 33kV infrastructure is covered by the provisions of the Renewable Energy Directive III (Directive (EU) 2023/2413) and it is important to note that the planning application may be subject to section 34D of the Planning and Development Act 2000.

This Renewable Planning Statement fulfils the requirement for a Renewable Energy Designation Policy Statement and provides clear justification of the policy context for the proposed development as required to demonstrate the Completeness of the application.

However, it is important to note that the 110kV infrastructure, by reason of it falling within Section 182E of the Planning and Development Act 2000 does not fall under the provisions of the RED III Directive.

The RED III regime, as transposed into Irish law by the *European Union (Planning and Development) (Renewable Energy) Regulations 2025 (S.I. No. 274 of 2025)*, and related amending instruments (including *S.I. No. 426 of 2025 and S.I. No. 435 of 2025*) and the Department of Housing, Local Government and Heritage’s *Circular CEPP 1/2025 dated 15 August 2025* is expressly designed to accelerate the deployment of renewable energy infrastructure and to remove unnecessary administrative barriers. The underlying intent of both the RED III Directive and the implementing regulations is to facilitate, not frustrate, the delivery of renewable energy projects in the public interest.

Notably, Appendix 2 of the Circular CEPP 1/2025 dated 15 August 2025 directs the competent authority that:

“If the applicant has not sent all the information required to process the application, request that the applicant submit a complete application without undue delay.”



The Circular further clarifies that

“the purpose of the 45-day completeness check is to minimise instances whereby FI will be required. It has also been confirmed that if an application is deemed incomplete, if/when an application is resubmitted the 45-day completeness check process applies again.”

Neither section 37JA(b) nor Article 216A require the Competent Authority to reject an application where the Applicant and the Competent Authority disagrees with an assessment methodology, especially where an argument has been made for or against an assessment methodology. Additionally, further clarification provided by the Department of Housing, Local Government and Heritage in Section 5.1 of their *REDIII Your Questions Answered* document, dated 22 October 2025 and updated 15 January 2026, outlines that the completeness check process does not eliminate the possibility of further information requests.¹

Therefore, we trust the Competent Authority will consider the application in its entirety and if you require any additional information we are happy to furnish this to the Competent Authority in due course.

¹ [20260115 DHLGH RED III YQA.pdf](#)



4. POLICY

4.1 Introduction

Renewable energy development receives support from international, national, regional and local policy as well as from binding international agreements and European Community agreements. This is in an attempt to reduce reliance on fossil fuels, and to manage climate change on an international scale.

This section of the Planning and Environmental Report examines the policies which support this application and the consequential Irish legislation, which dictates the consenting process.

4.2 National Policy

Ireland is one of the most “*energy import-dependent*” countries in the European Union. For 2022, Ireland’s import dependency was 81.6% (SEAI, 2023), and the SEAI estimates that the cost of all energy imports to Ireland was approximately €4.5 billion (in 2019). This makes Ireland particularly vulnerable to future energy crises and fluctuations given its location on the periphery of Europe. The international fossil fuel market is growing increasingly volatile and affected by international politics. Any steps to reduce dependence on imported fossil fuels will add to financial autonomy and stability in Ireland.

4.2.1 Project Ireland 2040: The National Planning Framework

Project Ireland 2040: The National Planning Framework (NPF) published in February 2018, sets out the high-level, strategic planning and development for the country over the next 20+ years, in order to ensure that growth is economically, socially and environmentally sustainable in line with population growth. The Framework sets out to guide public and private investment, to create and promote opportunities for people, and to protect and enhance the environment, through a single shared set of goals (National Strategic Outcomes (NSOs)).

The NPF identifies the role of renewable energy sources in our transition to a low-carbon energy future throughout the document.

NSO 8, Transition to a Low-Carbon and Climate-Resilient Society, provides for regular Renewable Electricity Support Scheme (RESS) auctions to deliver competitive levels of onshore wind and solar electricity generation, which indicatively could be up to 2.5 GW of grid-scale solar and up to 8 GW of onshore wind by 2030. The RESS will also support the delivery of up to 5 GW of additional offshore renewable electricity generation by 2030.



In the context of the Proposed Development, the following National Policy Objectives are considered most relevant to the proposal:

Table 3-1: National Planning Framework: National Policy Objectives relevant to Coom Green Energy Park

<p>National Policy Objective 23</p>	<p>“Facilitate the development of the rural economy through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bioeconomy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism.”</p>
<p>National Policy Objective 47</p>	<p>“In co-operation with relevant Departments in Northern Ireland, strengthen all-island energy infrastructure and interconnection capacity, including distribution and transmission networks to enhance security of electricity supply.”</p>
<p>National Policy Objective 55</p>	<p>“Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050.”</p>
<p>National Policy Objective 64</p>	<p>“Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.”</p>

The NPF identifies that The National Climate Policy Position establishes the national objective of achieving a transition to a competitive, low carbon, climate resilient and environmentally sustainable economy by 2050. This objective will require investment in new energy systems and transmission grids to ensure a well-distributed energy system, harnessing both on-shore and off-shore potential from sources including wind, wave and solar.

The NPF further recognises the need for strengthened, more environmentally focussed planning at a local level:

“The future planning and development of our communities at local level will be refocused to tackle Ireland’s higher than average carbon-intensity per capita² and enable a national transition to a competitive low carbon, climate resilient and environmentally sustainable economy by 2050, through harnessing our country’s prodigious renewable energy potential.”

Section 5.4, Planning and Investment to Support Rural Job Creation Energy Production, identifies the integral role of renewable energy in assisting to sustain rural employment and drive the national economy:

“Ireland’s natural resources are some of our greatest assets and through the development of the agriculture, food, forestry, tourism and renewable energy sectors, this will not only sustain rural employment, but also contribute to driving the national economy.”



It is acknowledged within the NPF that:

“Rural areas have significantly contributed to the energy needs of the country and will continue to do so, having a strong role to play in securing a sustainable renewable energy supply. In planning Ireland’s future energy landscape and in transitioning to a low carbon economy, the ability to diversify and adapt to new energy technologies is essential. Innovative and novel renewable solutions have been delivered in rural areas over the last number of years, particularly from solar, wind and biomass energy sources.”

The NPF also identifies those rural areas that will be the primary location for the majority of renewable energy developments:

“In meeting the challenge of transitioning to a low carbon economy, the location of future national renewable energy generation will, for the most part, need to be accommodated on large tracts of land that are located in a rural setting, while also continuing to protect the integrity of the environment and respecting the needs of people who live in rural areas.”

On the 20th of June 2023, the Government gave approval to commence the process of undertaking the First Revision of the NPF in accordance with Section 20C (5) of the Planning and Development Act, 2000 (as amended). An Expert Group comprising three independent experts with experience in spatial planning, economic and social development and environmental protection, was established in March 2023. The Expert Group submitted their findings to Minister O’Brien on 16th August 2023, and it will now inform the preparation of an ‘Issues Paper’ for stakeholder consultation.

On the 5th March 2024, the Government agreed to defer the approval of the revised NPF and has set out a revised timeline. The reason for the deferral is due to the delay in the publishing of Census data during Covid-19, Census input is crucial in relation to housing and demographics which informs the NPF. It is proposed that the revised timeline will involve the publication of the draft revised NPF and accompanying technical assessments for national public consultation in June 2024. This will be followed by an Amendment Stage in August 2024 for review and consideration of the submissions received and the application of any relevant amendments. The finalised document will be published, subject to approval, in September 2024. The draft revised NPF will be subject to engagement and scrutiny by the Joint Oireachtas Committee.

In conclusion, the NPF is the relevant policy document for Ireland, providing a context for which renewable energy developments should be considered and highlighting sustainable means of achieving the Plan’s objectives. The proposed development at Coom can be considered supportive of, and consistent with the aims of the NPF through the provision of necessary renewable energy resources in order to support the transition to a low-carbon economy.

4.2.2 Project Ireland 2040: National Development Plan 2021-2030

The National Development Plan 2021-2030 (NDP) published in October 2021, in tandem with the NPF, sets out the government’s over-arching investment strategy and budget for the period 2021-2030. It is an ambitious plan that balances the demand for public investment across all sectors with a focus on improving the delivery of infrastructure projects. The NDP provides a platform from which investment can be provided and strategized in terms of economic growth, development and sustainability needs.



The NDP identifies how the anticipated level of investment will further the economy's growth potential and allow for the construction sector to provide the capacity and capability required to deliver infrastructural projects.

The key role of the NDP is to set out the updated configuration for public capital investment over the lifetime of the plan to achieve the National Strategic Outcomes as set out within the NPF.

The NDP outlines several key energy initiatives, that set out to diversify our energy resources, and to assist in the transition towards a decarbonised society, noting that:

“climate action is another major driver, given Ireland’s goal of an average 7 percent reduction per annum in greenhouse gas emissions from 2021 to 2030 which will require major increases in investment in areas such as energy efficiency”.

If constructed, the proposed development will form part of the national grid infrastructure necessary to transition towards this decarbonised society.

4.2.3 Climate Action and Low Carbon Development (Amendment) Act 2021

In July 2021, The President of Ireland signed into law the Climate Action and Low Carbon Development (Amendment) Act 2021.

This put Ireland on a legally binding path to net-zero emissions no later than 2050 and to a 51% reduction in emissions by the end of this decade. The Act provides a framework for Ireland to meet its international and EU climate commitments.

In 2022, the government published the first 5-year carbon budget by the Climate Advisory Council providing sectoral ceilings for carbon emissions for different sectors of the economy. This included an increase in renewable energy generation targets in an effort to further accelerate the reduction of overall economy-wide emissions.

Section 17 of the Climate Action and Low Carbon Development Act (Amendment) 2021 amending section 15 of the 2015 Act requires that:

- (1) A relevant body shall, in so far as practicable, perform its functions in a manner consistent with;
- I. the most recent approved climate action plan,
 - II. the most recent approved national long term climate action strategy,
 - III. the most recent approved national adaptation framework and approved sectoral adaptation plans,
 - IV. the furtherance of the national climate objective, and
 - V. the objective of mitigating greenhouse gas emissions and adapting to the effects of climate change in the State.



This text amended section 15 of the 2015 Act which required:

15. (1) A relevant body shall, in the performance of its functions, have regard to..

The change from a requirement to “have regard to” various national objectives to a standard where relevant bodies must “perform their functions in a manner consistent with” the latest national climate action policies, represents a considerable raising of the legal bar.

Critically and importantly for the purposes of the **Commission’s (ACP) and Cork County Council’s consideration of this application, it provides that a relevant body, such as the Commission, shall, insofar as practicable, perform its functions in a manner consistent with the mostly recently approved Climate Action Plan and other matters set out in section 15 of the 2015 Act.**

Climate Action Plan 2025 (CAP25)

It is within the context of the European Policy and National Policy and legislation that the Climate Action Plan is set. The Climate Action Plan 2023 (CAP23) was the first Plan to be prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021, and follows the introduction, of the carbon budgets and legally binding sectoral emissions ceilings. Since 2023, 2no. revisions of the Plan has been prepared, CAP24 and CAP25.

CAP25 underlines the important role the planning regime will play in developing Ireland’s renewable energy capacity. The latest Climate Action Plan 2025 (hereafter CAP25) was approved by Government on 15 April 2025. It is the third statutory Climate Action Plan since the Climate Action and Low Carbon Development (Amendment) Act 2021 was passed and the fifth overall. It is the last Climate Action Plan of Ireland’s first five-year carbon budget, representing an important half-way mark to 2030. If Ireland is to close the Greenhouse Gas (GHG) emissions gap and make headway towards our 2030 and 2050 emissions reduction targets, we must accelerate progress already made and deliver on the actions in CAP25 as well as rapidly and fully implementing those legacy/delayed actions and policies from CAP23 and CAP24.

CAP25 is to be read in conjunction with CAP24 as an updated and amended plan. All the measures and actions to support the delivery of binding climate targets are set out within the plan. CAP25 has an Annex of Actions which sets out new, high impact actions for 2025 and includes delayed actions from both CAP24 and CAP23 which will be tracked until completion.

A key element of CAP25 is the decarbonization of Ireland’s electricity system, primarily through a significant increase in renewable energy generation. The plan reiterates ambitious targets for renewable electricity, aiming for 50% by 2025 and 80% renewable energy by 2030. These goals will be met by accelerating the deployment of:

- Onshore wind: 2 GW by 2025; 9 GW by 2030
- Offshore wind: 5 GW by 2030
- Solar energy: Up to 5 GW by 2025; 8 GW by 2030



Delivery of Climate Change Targets

The targets set out in CAP 24/25 are legally binding by virtue of the Climate Action and Low Carbon Development Act 2015 (as amended), however despite this, multiple assessments, including the Climate Change Advisory Council (CCAC) Annual Review and the Environmental Protection Agency (EPA) emissions projections, confirm that Ireland is not on track to meet these targets. Significant gaps remain in renewable energy deployment, particularly in grid capacity expansion and wind farm development, while continued reliance on fossil fuels threatens national and EU climate commitments.

As identified in the National Planning Framework First Revision, the Southern Regional Assembly (SRA) target requires facilitating a further 978 MW of renewable power up to 2040. Securing planning permissions for this electrical infrastructure to support the Coom Green Energy Project, is essential in order to meet this target.

4.2.4 Assessment

This section of the report clearly sets out Ireland's obligations in addressing Climate Change. Ireland has been mandated by the European Union to set legally binding targets for the reduction in greenhouse gas emissions by over half by 2030 and these provisions are set out in the Climate Act 2021. Sectoral specific targets are set out in the Climate Action Plan 2025 which requires the installation of 9 GW of Onshore Wind Energy by 2030 and 6GW by 2025. Currently there is an installed capacity of c. 4.9GW which demonstrates that there is a significant requirement by all bodies to work together to achieve this target. The enormity of the challenge is recognised in the Climate Action Plan 2024/25 where it is stated *"To achieve the necessary emissions abatement, an approximately eight-times increase of renewable energy deployment to 2.3 GW annually would be needed between 2024 and 2030"*.

The importance of meeting these legally binding targets is recognised by government by setting out clear parameters on how 'relevant Bodies' in this instance The Commission should perform their function. Section 17 of the Act 2021 requires the Board to *"perform its functions in a manner consistent with"* the most recent approved climate action plan, national long term climate action strategy, national adaptation framework and sectoral adaption plans.

It is respectfully submitted that the Commission and Cork County Council in weighing up competing policy objectives as part of their determination, shall consider this overarching, legally binding, emissions reduction objective, and perform their functions in a manner that is consistent with the delivery of the legally binding sectoral emissions ceilings, and associated Climate Action Plan targets.



4.3 Regional Policy

4.3.1 Regional Spatial and Economic Strategy for the Southern Region (RSES)

Following the establishment of the Southern Regional Assembly on 1st January 2015, the Regional Spatial and Economic Strategy for the Southern Region (RSES) was published on the 28th June 2019, in accordance with section 24 (9) of the Planning and Development Act 2000. Under the Planning and Development Act 2000 (as amended). The RSES is a 12-year strategic development framework for the southern region prepared by the Southern Regional Assembly (SRA) and implements NPF policy for achieving balanced regional development. It ensures regional coordination between county development plans, and Local Enterprise and Community Plans, and is required to address employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development, and climate change.

The principal statutory purpose of the RSES is to support the implementation of the National Planning Framework – Ireland 2040, as well as the economic policies and objectives of the government by providing a long-term strategic planning and economic framework for the development of the region. The objective of regional spatial and economic strategies is;

“to support the implementation of the National Spatial Strategy and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region for which the strategies are prepared which shall be consistent with the National Spatial Strategy and the economic policies or objectives of the Government.” (sec 23 Planning and Development Act 2000).”

The RSES supports sustainable renewable energy generation and the implementation of the National Renewable Energy Action Plan. The strategy supports the sustainable development, maintenance and upgrade of electricity network grid infrastructure to integrate renewable energy sources and ensure that the national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows. Along with providing policy support for renewable energy, the RSES supports resource efficiency while maintaining sustainability and minimising impacts on the environment.

The Proposed Development is in line with the policy objectives of the RSES in producing renewable energy in an efficient and sustainable manner while minimising impacts on the receiving environment.

Chapter 5 of the RSES focuses on environment and climate change within the region while Chapter 8 focuses on water and energy utilities. The following policy objectives are set out within the RSES which are in support of the development of renewable energy projects in the region.



Table 3-2: Southern Regional Spatial & Economic Strategy: Key Policy Objectives

Policy Objective	Description
<p>RPO 9</p>	<p><i>Holistic Approach to Delivering Infrastructure</i></p> <p>It is an objective to ensure investment and delivery of comprehensive infrastructure packages to meet growth targets that prioritise the delivery of compact growth and sustainable mobility as per the NPF objectives including: Water services, digital, green infrastructure, transport and sustainable travel, community and social, renewable energy, recreation, open space amenity, climate change adaptation and future proofing infrastructure including flood risk management measures, environmental improvement, arts, culture and public realm.</p>
<p>RPO 44</p>	<p><i>Common Agricultural Policy</i></p> <p>It is an objective to ensure the delivery of sustainable actions under the Rural Development Programme (RDP) 2014-20 and beyond in priority areas of innovation, bio-diversity restoration, water and soil management, renewable energy and waste management, carbon conservation and sequestration, diversification, job creation and ICT development in our rural areas.</p>
<p>RPO 50</p>	<p><i>Diversification</i></p> <p>It is an objective to further develop a diverse base of smart economic specialisms across our rural Region, including innovation and diversification in agriculture (agri-Tech, food and beverage), the marine (ports, fisheries and the wider blue economy potential), forestry, peatlands, renewable energy, tourism (leverage the opportunities from the Wild Atlantic Way, Ireland’s Ancient East and Ireland’s Hidden Heartlands brands), social enterprise, circular economy, knowledge economy, global business services, fin-tech, specialised engineering, heritage, arts and culture, design and craft industries as dynamic divers for our rural economy.</p>
<p>RPO 56</p>	<p><i>Low Carbon Economy</i></p> <p>The RSES recognises the urgency to transition to a low carbon future and it is therefore an objective to accelerate the transition towards low carbon economy and circular economy through mechanisms such as the Climate Action Competitive Fund.</p> <p>It is an objective to develop enterprises that create and employ green technologies. Local authorities should ensure that the development of green industry and technologies incorporates careful consideration of potential environmental impacts at project level including the capacity of receiving environment and existing infrastructure to serve new industries.</p> <p>Local authorities shall include objectives in statutory land use plans to promote energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock, energy efficiency in traditional buildings and initiatives to achieve Nearly Zero-Energy Buildings (NZEB) standards in line with the Energy Performance of Buildings Directive (EPBD).</p>



Policy Objective	Description
	<p>It is an objective to support investments in energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B.' Local authorities shall report annually on energy usage in all public buildings and will achieve a target of 33% improvement in energy efficiency in all buildings in accordance with the National Energy Efficiency Action Plan (NEEAP).</p>
<p>RPO 87</p>	<p><i>Low Carbon Energy Future</i></p> <p>The RSES is committed to the implementation of the Government's policy under Ireland's Transition to a Low Carbon Energy Future 2015-30 and Climate Action Plan 2019. It is an objective to promote change across business, public and residential sectors to achieve reduced GHG emissions in accordance with current and future national targets, improve energy efficiency and increase the use of renewable energy sources across the key sectors of electricity supply, heating, transport and agriculture.</p>
<p>RPO 88</p>	<p><i>National Mitigation Plan and National Adaption Framework</i></p> <p>The RSES is committed to the implementation of the National Mitigation Plan and National Adaptation Framework: Planning for a Climate Resilient Ireland to enable the Region transition to a low carbon, climate resilient and environmentally sustainable economy. It is an objective to ensure effective co-ordination of climate action with the Climate Action Regional Offices and local authorities to implement the National Mitigation Plan and the National Adaptation Framework in the development and implementation of long-term solutions and extensive adaptation measures.</p>
<p>RPO 89</p>	<p><i>Building Resilience to Climate Change</i></p> <p>It is an objective to support measures to build resilience to climate change throughout the Region to address impact reduction, adaptive capacity, awareness raising, providing for nature-based solutions and emergency planning.</p> <p>Local Authorities and other public agencies shall continue to work with the Office of Public Works to implement the Flood Risk Management Plans and address existing and potential future flood risks arising from coastal, fluvial, pluvial, groundwater and potential sources of flood risk.</p>
<p>RPO 90</p>	<p><i>Regional Decarbonisation</i></p> <p>It is an objective to develop a Regional Decarbonisation Plan to provide a framework for action on decarbonisation across all sectors.</p> <p>The Regional Decarbonisation Plan shall include existing and future targets for each sector and shall be prepared with key stakeholders, including the Climate Action Regional Offices, and shall identify the scope and role of the Plan, the requirements for SEA, AA and the timescale for its preparation. Implementation mechanisms and monitoring structures for the Plan should also be established.</p>



Policy Objective	Description
RPO 95	<p><i>Sustainable Renewable Energy Generation</i></p> <p>It is an objective to support implementation of the National Renewable Energy Action Plan (NREAP), and the Offshore Renewable Energy Plan and the implementation of mitigation measures outlined in their respective SEA and AA and leverage the Region as a leader and innovator in sustainable renewable energy generation.</p>
RPO 96	<p><i>Integrating Renewable Energy Sources</i></p> <p>It is an objective to support the sustainable development, maintenance and upgrading of electricity and gas network grid infrastructure to integrate renewable energy sources and ensure our national and regional energy system remains safe, secure and ready to meet increased demand as the regional economy grows.</p>
RPO 97	<p><i>Power Stations and Renewable Energy</i></p> <p>It is an objective to support the sustainable technology upgrading and conversion of power stations in the Region to increase capacity for use of energy efficient and renewable energy sources.</p>
RPO 98	<p><i>Regional Renewable Energy Strategy</i></p> <p>It is an objective to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.</p>
RPO 100	<p><i>Indigenous Renewable Energy Production and Grid Injection</i></p> <p>It is an objective to support the integration of indigenous renewable energy production and grid injection.</p>
RPO 101	<p><i>International Hub for Energy Innovation</i></p> <p>It is an objective to support continued innovation and research in the energy sector and to develop a role as an international hub for energy innovation.</p>
RPO 122	<p><i>Sustainable Drainage Systems</i></p> <p>It is an objective to:</p> <p>Promote the integration of sustainable water management solutions such as the use of SuDs. Future development and Local Area Plans in the region should include objectives and actions to encourage the integration of sustainable water management solutions such as the use of SuDS.</p> <p>Promote the diversion of surface water from combined sewers where possible.</p>



Policy Objective	Description
<p>RPO 219</p>	<p><i>New Energy Infrastructure</i></p> <p>It is an objective to support the sustainable reinforcement and provision of new energy infrastructure by infrastructure providers (subject to appropriate environmental assessment and the planning process) to ensure the energy needs of future population and economic expansion within designated growth areas and across the Region can be delivered in a sustainable and timely manner and that capacity is available at local and regional scale to meet future needs.</p>
<p>RPO 221</p>	<p><i>Renewable Energy Generation and Transmission Network</i></p> <p>Local Authority City and County Development Plans shall support the sustainable development of renewable energy generation and demand centres such as data centres which can be serviced with a renewable energy source (subject to appropriate environmental assessment and the planning process) to spatially suitable locations to ensure efficient use of the existing transmission network.</p> <p>The RSES supports strengthened and sustainable local/community renewable energy networks, micro renewable generation, climate smart countryside projects and connections from such initiatives to the grid.</p> <p>The potential for sustainable local/community energy projects and micro generation to both mitigate climate change and to reduce fuel poverty is also supported.</p> <p>c. The RSES supports the Southern Region as a Carbon Neutral Energy Region.</p>
<p>RPO 222</p>	<p><i>Electricity Infrastructure</i></p> <p>It is an objective to support the development of a safe, secure and reliable supply of electricity and to support and facilitate the development of enhanced electricity networks and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this plan under EirGrid's (2017) Grid Development Strategy (subject to appropriate environmental assessment and the planning process) to serve the existing and future needs of the Region and strengthen all-island energy infrastructure and interconnection capacity.</p>

4.4 Local Policy

4.4.1 Cork County Development Plan 2022-2028

The Cork County Development Plan 2022-2028 was adopted on the 25th of April 2022 and came into effect on the 6th of June 2022 as the main guiding planning policy for development within the Cork County Council administrative area. The Plan sets out policy and objectives in relation to economic development, biodiversity, and energy and climate action. For the purposes of this Application, in relation to the location of the Proposed Development, particular consideration has been given to Volume 3 - North Cork of the County Cork Development Plan 2022-2028. The section below presents a brief discussion on the key policies outlined in the Development Plan (please refer to Chapter 4 – Policy, Volume 2 of the accompanying EIAR for further information on policy).



Table 3-3: A summary of the key relevant planning policies and objectives from the Cork County Development Plan 2022-2028 (please refer to Chapter 4 – Policy, Volume 2 of the EIAR accompanying this Application for the full list)

Planning Policy	Description
CS 2-5 North Cork Strategic Planning Area	(g) Facilitate the development of renewable energy projects in support of national climate change objectives.
Objective ET 13-1	Ensure that County Cork fulfils its potential in contributing to the sustainable delivery of a diverse and secure energy supply and to harness the potential of the county to assist in meeting renewable energy targets.
Objective ET 13-2	Support Ireland’s renewable energy commitments as outlined in Government Energy and Climate Change policies by facilitating the development of renewable energy sources such as wind.
Objective ET 13-4	Support further development of on-shore wind energy projects including the upgrading, repowering or expansion of existing infrastructure, at appropriate locations within the county.
Objective ET 13-21	Support and facilitate the sustainable development, upgrade and expansion of the electricity transmission grid, storage, and distribution network infrastructure, and facilitate where practical and feasible, infrastructure connections to wind farms.
Objective ET 13-22	Proposals for new electricity transmission networks will need to consider the feasibility of undergrounding or the use of alternative routes to ensure that the provision of new transmission networks can be managed in terms of their physical and visual impact.
Objective ET 13-27	To seek to reduce greenhouse gas emissions by promoting energy efficiency and the development of renewable energy sources utilising the natural resources of County Cork in an environmentally sustainable manner.
HE 16-9: Archaeology and Infrastructure Schemes	All large scale planning applications (i.e. development of lands on 0.5 ha or more in area or 1km or more in length) and Infrastructure schemes and proposed roadworks are subjected to an archaeological assessment as part of the planning application process which should comply with the Department of Arts, Heritage and the Gaeltacht’s codes of practice. It is recommended that the assessment is carried out following pre planning consultation with the County Archaeologist, by an appropriately experienced archaeologist to guide the design and layout of the proposed scheme/development, safeguarding the archaeological heritage in line with Development Management Guidelines.



Cork County Wind Energy Strategy

The Wind Energy Strategy for County Cork is contained within Volume 1, Section 13.6 of the Cork County Development Plan 2022-2028 and is visually detailed in the associated Figure 13.3 (Wind Energy Strategy Map). The vision of the Strategy is:

"The Council will seek to support a plan-led approach to commercial wind energy development in County Cork through the identification of specific deployment areas. The aim is to ensure minimal environmental constraints arise in advance of the planning process, focusing on-shore wind energy projects in areas considered 'Acceptable in Principle' and 'Open to Consideration,' while generally avoiding 'Normally Discouraged' areas and sites of ecological sensitivity."

Developed using the "Planning for Wind Energy Development Guidelines 2006" and the 2013 SEAI Manual, the strategy utilises a sieve mapping analysis of environmental, landscape, technical, and economic criteria. The strategy facilitates commercial development in approximately 55% of the county, while the remaining 45% is deemed unlikely to be suitable.

Key policy considerations shaping the strategy include population distribution, grid access, viable wind speeds, protection of high-value landscapes and Natura 2000 sites, Water Framework Directive compliance, cumulative impacts, and the policies of adjoining local authorities.

For commercial wind energy developments—defined as projects whose primary purpose is to generate electricity for the grid—the strategy identifies three categories of "Wind Deployment Area" on the map in Figure 13.3 of the Cork County Development Plan 2022 – 2028.

4.4.2 Assessment

The Project complies in full with the Cork County Council County Development Plan 2022 – 2028 Policies and Objectives and the Cork WES and the obligations therein. The proposed underground cable connections and onsite 110kV substation are an integral part of the Coom Green Energy Park infrastructure and will ensure the export of approximately 105 MW of renewable energy to the national grid. National policy, such as the Climate Action Plan (CAP25), is clear and unequivocal on the importance of delivering 9 GW of onshore wind by 2030, an objective reflected in the Cork County Development Plan's commitment to transition to a low carbon and climate-resilient society. The proposed grid connection development fully accords with and supports the objectives of national and local planning and energy policies.

The proposed development is also compliant with Policy HE 16-9 of the County Development Plan which requires;

All large scale planning applications (i.e. development of lands on 0.5 ha or more in area or 1km or more in length) and Infrastructure schemes and proposed roadworks are subjected to an archaeological assessment as part of the planning application process which should comply with the Department of Arts, Heritage and the Gaeltacht's codes of practice. It is recommended that the assessment is carried out following pre planning consultation with the County Archaeologist, by an appropriately experienced archaeologist to guide the design and layout of the proposed scheme/development, safeguarding the archaeological heritage in line with Development Management Guidelines.



A Qualified and Experienced Archaeologist was appointed as part of the Design Team to oversee and review the proposed development and to ultimately prepare an Archaeological Impact Assessment (IAI) in accordance with Best Practice Guidance. Please refer to Chapter 13 -Archaeology, Architectural and Cultural Heritage of the EIAR which was prepared by John Cronin and Associates (JCA). This assessment built upon a previous archaeological assessment carried out by JCA for the consented Coom Green Energy Park (CGEP) as part of the EIAR for that development in 2020. Both the 2020 EIAR and new EIAR for the Proposed Development covered the grid connection and interconnector cable routes.

Pre-application consultation was carried out with the Cork County Council Archaeologist (CCCA), as recommended by Objective 16-9 of the County Cork Development Plan 2022-2028 (see Section 13.3.2). An online pre-application meeting with Cork County Council on 04/02/2026 was attended by the chapter author (Tony Cummins of JCA) and the CCCA. The meeting included discussions in relation to the absence of any recorded archaeological sites or designated architectural structures within the environs of the Proposed Development, details on the nature of construction phase works as well as the potential suitability of geophysical survey of the Proposed Development and the associated onsite constraints, which includes extensive sections within forestry and public roads.

The chapter author also carried out further consultation with the CCCA by email and phone during February 2026 in relation to these onsite constraints and the CCCA recommended pre-application testing of any suitable green field lands.

As described in Section 13.4 and 13.5 of the EIAR, there are no recorded archaeological sites located within 100m of the green field sections of the Proposed Development which comprises areas of pasture fields that appear to have been created during 20th century land improvement works. The excavation of a 1250mm wide cable trench adjacent to field boundaries and modern farm tracks will be the only construction phase works within the green field areas, and no associated works such as hardstands and compounds will be required.

While the potential exists that the small-scale footprint of the proposed cable trench may contain as yet unrecorded subsurface archaeological features that could be subject to direct effects, as detailed in **Section 13.5 of the EIAR, the Applicant will, therefore, appoint a suitably qualified archaeologist to constantly monitor the excavation of the section of cable trench within all green field areas during the construction phase, and this will be carried out under licence by the National Monuments Service.**

The Applicant is happy to accept a post-planning condition requiring geophysical or intrusive test trenching for archaeological purposes. **This it is submitted, is in accordance with the Office of Planning Regulator (OPR) Practice Note PN-03²**

Furthermore, it should be noted that the carrying out of Geophys is not appropriate given the nature of the works and site context. The cabling located within the private lands will be laid within a 1.25m wide trench, close to the existing agricultural fences and roadside. In our professional opinion, this would significantly limit the effectiveness of deploying geophysical surveying due to the narrow width of the development footprint and the magnetic disturbance caused by surface iron features (such as adjacent field fences, field gates etc.) which makes the development unsuitable for geophysical prospection. We append to this Planning Statement a letter from the Geophysical Expert outlining this in depth (See Appendix 1).

² <https://publications.opr.ie/storage/publications/d9kO67iUDTjQ6UT3RI2jFn0DWfIkxkUCV4V05WJY.pdf>



5. PLANNING ASSESSMENT

Having considered the site context and development proposals in line with prevailing planning policy and guidance set out within the previous sections of this report, we consider each of these matters in turn below.

5.1 Principle of Development

It is clear from the European, National and Local Climate and Energy policy review as set out in Section 3 and Chapter 5 – Policy, Volume 2 of the EIAR, the Proposed Development is compatible with National and Local policy designations, and therefore the proposed development should be considered to accord with the proper planning and sustainable development of the area, subject to normal planning and environmental considerations.

Planning applications must be determined upon their individual merits with due consideration given to proper planning and sustainable development as well as State, Ministerial and Local policies and objectives. However, the Irish Government has made it clear that weight should be placed on the need to support climate recovery through the planning system and related consent regimes. The National Planning Policy Framework (NPPF) sets out that sustainable development is pursued in a positive way except where this would compromise the key sustainable development principles: economic, social and environmental. The Proposed Development meets each of the three principles of sustainable development as demonstrated in Table 4-1.

Table 4-1: The Development as Sustainable Development

Sustainable Development Principle	Accordance by the Proposed Development
Economic Role	<p>In addition to the benefits of energy generation carbon savings, the Proposed Development will generate wider benefits including job creation and wider socioeconomic benefits.</p> <p>The overall capital invested associated with the Proposed Development and the consented Coom Green Energy Park which it facilitates, is expected to generate positive economic impacts. Additionally, there will be beneficial effects for both local and international supply chain, contributing to wider renewable energy sector growth.</p> <p>It is considered that the construction phase will have a beneficial effect on the local economy and employment in the area through the creation of jobs, investment in local infrastructure and electrical systems, and a significant contribution of rates to the County Council over the project’s lifetime.</p> <p>If consented, the Proposed Development will provide for sustainable, low carbon energy generation infrastructure in County Cork to meet Ireland’s growing demand. The development benefits to the local community would include significant investment in local infrastructure and electrical systems, local job creation over the projects lifetime of around 35 years.</p>



Sustainable Development Principle	Accordance by the Proposed Development
Social Role	<p>Onshore wind development is recognised as a key technology in the energy mix which will contribute to Ireland’s low carbon future as set out in the National Planning Framework (NPF). The Proposed Development would contribute to the renewable electricity and energy targets as set out in NPF and to longer term Government policy objectives and targets.</p> <p>The Proposed Development will create an opportunity to further develop the local renewable energy industry knowledge and skills base.</p>
Environmental Role	<p>The proposed layout and design approach aims to locate as much of the road infrastructure in the existing public road corridor, making effective use of land and adding to the overall environmental quality of the area in the long term. The accompanying EIAR demonstrates that the Proposed Development fully respects the local character and identity of the environment while supporting adaptation to climate change and moving towards a low carbon economy.</p>

The Political Declaration recently adopted at the United Nations Sustainable Development Summit in New York (September 2023) reaffirmed that “climate change is one of the greatest challenges of our time”. The Declaration included the following statement:

“We stress the urgency of enhancing ambition for climate action in the implementation of the UNFCCC and the Paris Agreement in relation to climate mitigation, adaptation and the provision of the means of implementation, especially finance to developing countries. We urge the implementation of the decisions adopted at COP 27 held in Sharm El-Sheikh. We will take concrete steps toward the operationalization of the new funding arrangements for responding to loss and damage by COP 28. We commit to continuing our work to accelerate our action to address climate change. In this regard, we also look forward to the first global stock take of the Paris Agreement to take place at COP 28”.

The current failings to rise up to the climate challenge are recognised and the need for urgent action has been embedded in the Political Declaration of the United Nations, of which Ireland is a member. The requirement to enhance the ambition for climate action is a significant material matter for consideration when considering the weight that should be attributed to the substantial climate resilience benefits of the Proposed Development in determining the consent application.

Full and due regard has been had to the Cork County Development Plan 2022-2028 and accompanying Wind Energy Strategy and the obligations therein.



5.2 Environmental Impact Assessment

A summary of the main findings of the EIAR are set out within 'Volume 1 – Non Technical Summary' of the EIAR. The purpose of Environmental Impact Assessment Reports is to evaluate the potential effects of a proposed project on the environment. It informs decision makers, stakeholders and the public about possible consequences and recommends measures to reduce or offset effects. The EIAR accompanying this Application was carried out over the past 2 years (notwithstanding the EIAR which accompanied the consented Coom Green Energy Park and covered the same 110 kV GCR) and involved an extensive number of specialists (please refer to Appendix 1.1, Volume 3 of the EIAR). The design and EIA were developed together to ensure that the design incorporated imbedded mitigation measures as much as practically possible. It concluded that, subject to the implementation of the mitigation measures outlined within the document, there are no significant impacts arising from the Proposed Development.

The EIAR also fully compliant with the EIA Directive and Planning and Development Act 2000 (as amended).

5.3 Appropriate Assessment

As concluded in the Appropriate Assessment Screening and Natura Impact Statement accompanying the Application, taking into account the project design and mitigation measures to avoid effects that are considered, the Proposed Development will not adversely affect the integrity of the River Blackwater (Cork/Waterford) SAC, alone or in-combination with other plans or projects.



6. CONCLUSION

In accordance with the Planning and Development Act 2000 (as amended), this Planning Statement has assessed the Proposed Development against the policy provisions set out within the Cork County Development Plan 2022 – 2028.

It is considered that the Proposed Development, which will contribute towards the provision of critical electrical infrastructure and facilitates the connection of the Coom Green Energy Park to the national grid, is in the national interest and of strategic importance to Ireland, as it seeks to facilitate the provision of a high quality and sustainable renewable energy project in an appropriate location. The proposal has been designed to respond to the existing context of the site, taking into account of the technical considerations as evidenced within Volume 2 of the EIAR.

In conclusion, having regard to the:

- National and Strategic importance of the development for the Region, and Ireland as a whole;
- Provisions of the relevant policies and objectives to inform the development and design of the proposal as set out within the Cork County Development Plan 2022 – 2028;
- Provisions and targets outlined in Climate Action Policy at a Local, National, and International scale and the support for this type of development;
- Character and sensitivities of the receiving environment, as well as permitted development in the surrounding area;
- The range of environmental assessments prepared in respect of the Proposed Development as enclosed, which conclude no significant negative impacts with the implementation of proposed mitigation measures.

In our professional planning opinion, the Proposed Development:

- Is compliant with all appropriate International, National, Regional and Local policy and legislation.
- Contributes positively towards National and International Climate Commitments. It also supports Local, National and International Climate Policy and associated targets.
- Constitutes an appropriate intervention into the landscape at this location, and the principle of development at this location should be considered acceptable.
- Has been sensitively designed to ensure that it sits appropriately within its context.
- Would have a positive impact on the area.
- Provides a much-needed renewable energy development in this expanding environmentally and economically significant sector of the locale and region.

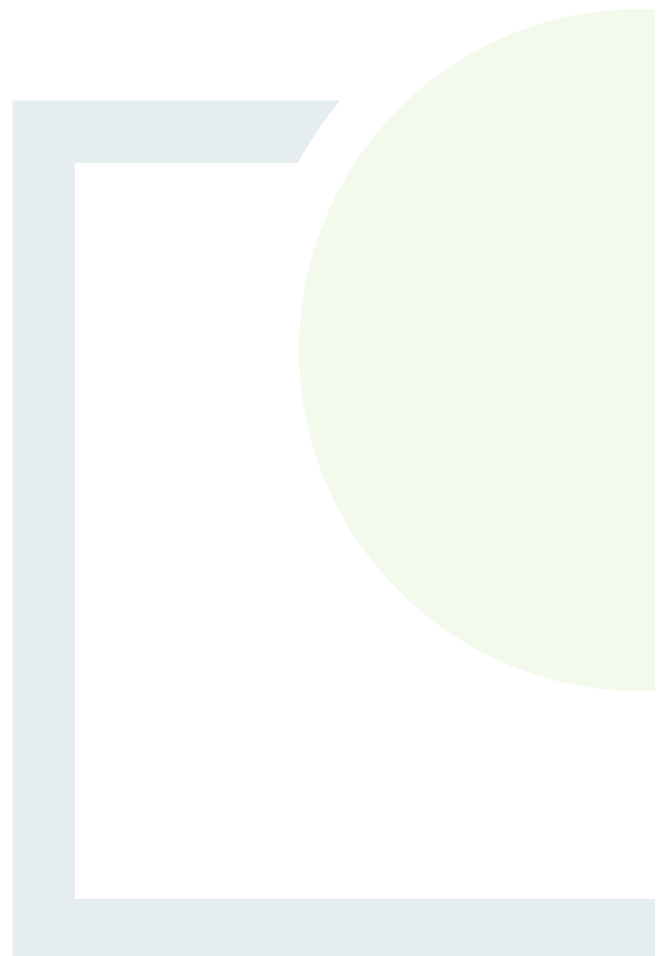
It is respectfully requested, for the reasons outlined within this Planning Statement and the findings of the EIAR and NIS, that the Council should grant permission for the Proposed Development as expeditiously as possible, and in any event in accordance with the time limits prescribed by the Renewable Energy Regulations.



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APPENDIX 1

Geophysical Survey Feasibility
Assessment



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18th February 2026

With regard to a proposed archaeo-geophysical survey of the route of the Coom Grid Connection Route (GCR), Co. Cork, I am writing to inform you that, having assessed the information provided by Tony Cummins (Senior Archaeologist, John Cronin & Associates), and having consulted the Environmental Impact Assessment Report¹ for the project, as well as recent satellite imagery, it is evident that the development is not suitable for geophysical prospection.

The GCR Project is to involve the laying of an underground cable to connect a proposed on-site substation to the existing 110kV substation at Barrymore, near the town of Rathcormac (**Figure 1**). However, the majority of the cable route (approximately 24 km in length) is within forestry plantation or along public roads (**Figure 2**), environments not suited to geophysical survey. Two small sections of the route (c.2.5km in combined length), on the west, extend along the edges of pasture fields (see **Plates 1–3**), though here too successful (magnetometry) data collection is hampered by several factors. Most notably, the proposed works in pastureland will be limited to the excavation of a 1.25m-wide cable trench, which is too narrow to aid contextualisation, and interpretation, of any detected magnetic anomalies. Moreover, magnetic disturbance ('noise') from adjacent field fences, field gates, etc., would severely compromise the quality (and usefulness) of the collated survey data.

Overall, the small development footprint, coupled with magnetic contamination from surface iron features, make the greenfield sections of the proposed cable route unsuitable for geophysical survey.

Kind regards,

Ger Dowling

¹ Fehily Timoney. 2020. Environmental Impact Assessment Report (EIAR) for the proposed Coom Green Energy Park, County Cork. Available online at: [p20099volume2chapter3descoftheproposeddevelopment1final.pdf](https://www.environmentalimpactassessment.com/cork/p20099volume2chapter3descoftheproposeddevelopment1final.pdf).

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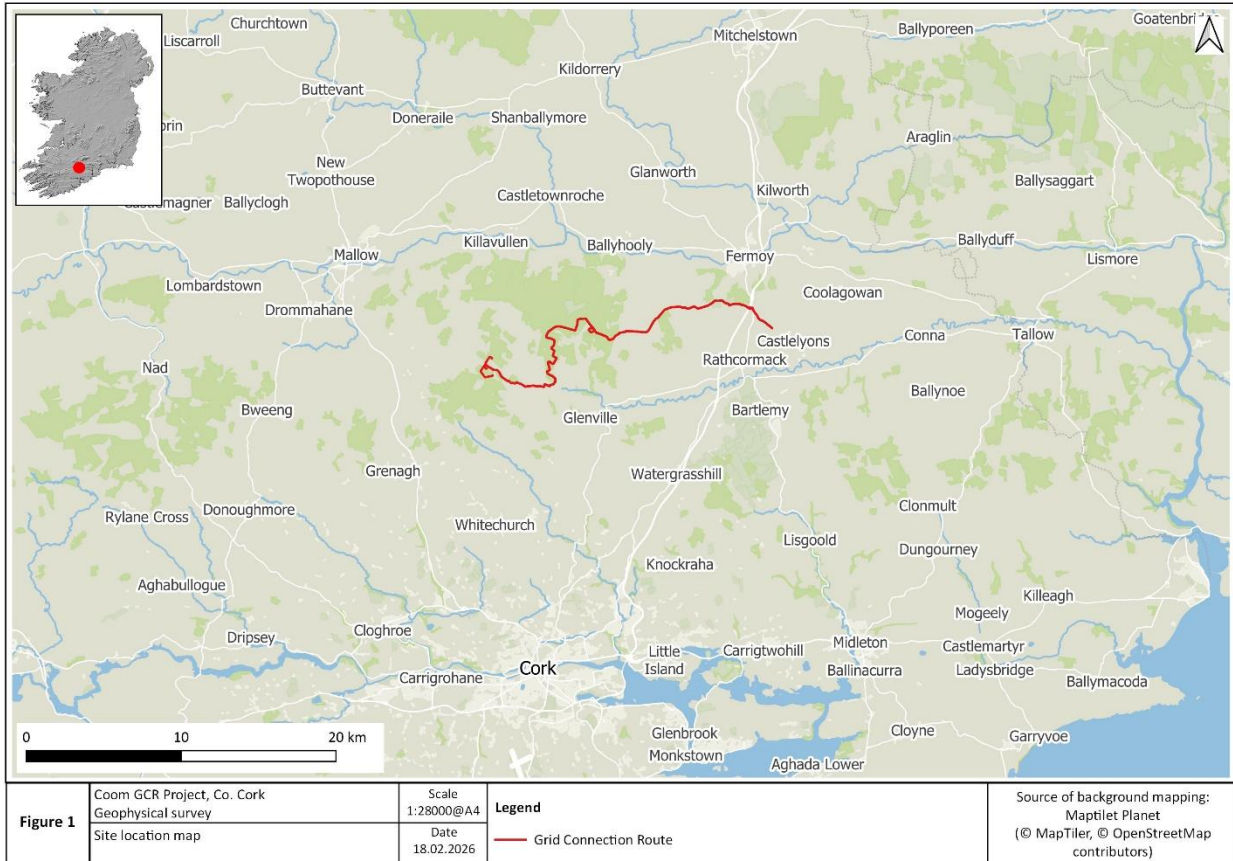


Figure 1. Proposed Coom Grid Connection Route.

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Figure 2. Proposed GCR route showing greenfield (green line), forestry (red line) and public roads (yellow line) with locations of Plates 1–3, below, indicated (Image courtesy of Tony Cummins, John Cronin & Associates).

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Plate 1. Looking west along cable route at edge of a pasture field in Coom (Hudson) townland. Note post-and-wire fence directly adjacent to route (photo: Tony Cummins).



Plate 2. View east of section of the cable route at edge of pasture field in Knocknacaheragh townland. Note post-and-wire fence and drainage ditch directly adjacent to route (photo: Tony Cummins).

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Plate 3. View east of section of the cable route at edge of pasture field in Knocknacaheragh townland. Note post-and-wire fence and farm track directly adjacent to route (photo: Tony Cummins).



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