

Environmental Impact Assessment Report

Lemanaghan Wind Farm,
Co. Offaly

Chapter 11 Climate



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GLOSSARY OF TERMS

| Term | Definition |
|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Carbon Budget | The total amount of greenhouse gas emissions that may be released during an agreed period. In Ireland, this is measured on an economy-wide basis, excluding aviation and maritime, in megatonnes of carbon dioxide equivalent over a five-year period. Carbon budgets are used in climate policy and act as a benchmark to help ensure sustained emissions reductions over a period of time. |
| Conference of the Parties | Every year since 1995, the Conference of the Parties (COP) has gathered the 196 Parties (195 countries and the European Union) that have ratified the Convention in a different country, to evaluate its |

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| | implementation and negotiate new commitments, and is the supreme decision-making body of the UNFCCC. |
| Embodied Carbon | The emissions associated with procuring, mining and harvesting raw materials, the transformation of those materials into construction products, transporting them to site, installation of these materials during a construction phase, and the subsequent replacement, removal, and disposal of these materials upon decommissioning |

GLOSSARY OF ACRONYMS

| Acronym | Definition |
|--------------------|----------------------------------------------------|
| AMOC | Atlantic Meridional Overturning Circulation |
| CCAC | Climate Change Advisory Council |
| CCPI | Climate Change Performance Index |
| CFRAM | National Catchment Flood Risk Management |
| CH ₄ | Methane |
| CO ₂ | Carbon Dioxide |
| COP | Conference of the Parties |
| ESR | Effort Sharing Regulation |
| ETS | Emissions Trading System |
| ICCA | Ireland's Climate Change Assessment |
| IPCC | Intergovernmental Panel on Climate Change |
| ktCO _{2e} | Kilotonnes of Carbon Dioxide Equivalent |
| LULUCF | Land Use, Land Use Change, and Forestry |
| MtCO _{2e} | Million Metric tonnes of Carbon Dioxide Equivalent |
| NCQG | New Collective Quantified Goal on Climate Finance |
| NIFM | National Indicative Fluvial Flood Mapping |
| NIR | National Inventory Report |
| RCP | Representative Concentration Pathways |
| tCO _{2e} | Tonnes of Carbon Dioxide Equivalent |
| TII | Transport Infrastructure Ireland |
| UNFCCC | Nations Framework Convention on Climate Change |

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|-----|-----------------------------------|
| WAM | With Additional Measures |
| WEM | With Existing Measures |
| WMO | World Meteorological Organisation |

11. CLIMATE

11.1 Introduction

This chapter identifies, describes, and assesses the potential direct and indirect effects on climate arising from the construction, operation and decommissioning of the Proposed Project and has been completed in accordance with the EIA guidance and legislation set out in Chapter 1: Introduction. The full description of the Proposed Project is detailed in Chapter 4 of this EIAR.

The objective of this assessment is to assess the potential effects that the Proposed Project may have on Climate and sets out proposed mitigation measures to avoid, reduce or offset any potential significant effects that are identified. This EIAR comprehensively assesses the susceptibility of the Proposed Project to climate change across EIAR Chapters 5 through 16, outlining specific measures in each chapter to enhance the Proposed Project's ability to withstand potential impacts that are identified. Chapter 16 of this EIAR consolidates the risks and vulnerabilities identified throughout all EIAR chapters to assess the overall risk to the Proposed Project concerning major accidents and natural disasters, including climate change.

The aim of the Proposed Project when in operation is to reduce the requirement for carbon-intensive, fossil fuel-based energy supply to the national grid and thereby reduce the amount of greenhouse gas emissions being released to the atmosphere. Harnessing more energy by means of renewable sources will reduce dependency on fossil fuels, thereby resulting in a reduction in harmful emissions that can be damaging to human health and the environment.

As detailed in Section 1.1.1 in Chapter 1, for the purposes of this EIAR, the various project components are described and assessed using the following references: 'Proposed Project', 'Proposed Wind Farm' 'Proposed Grid Connection', 'Proposed Project site', and 'site'.

11.1.1 Background

The Proposed Wind Farm is located approximately 3 kilometres (km) northeast of Ferbane and approximately 2.5 km southwest of the village of Ballycumber in Co. Offaly. It is proposed to access the Proposed Wind Farm via 5 no. proposed access points utilising national, regional, and local roads; please see Section 4.7.1 of Chapter 4 Description for further information on site access.

It is intended to connect the Proposed Wind Farm to the national electricity grid via a looped 220kV overhead cable which will connect the proposed onsite 220kV substation to the Shannonbridge-Maynooth 220kV Overhead Line (OHL) in the townland of Cooldorragh, Co. Offaly, located approximately 0.4km north of the Proposed Project site at its closest point (the proposed onsite 220kV substation). The grid connection OHL cabling route will measure approximately 0.8km in total length.

Existing activities within the site include site management and environmental monitoring as required under IPC Licence P0-500-01, and temporary wind measurement (a single 100m meteorological mast). Active peat extraction ceased in June 2020. Under IPC Licence No. 500-01, Bord na Mona, (BnM) is required to commence decommissioning and rehabilitation of the Boora Bog Group, of which the site is part. Part of the decommissioning involves removing previously harvested and stockpiled peat from the bogs. The removal of stockpiled peat was completed by the end of 2024.

The landcover within the site is a mixture of bare cutaway peat, re-vegetated bare peat, degraded raised bog, scrub, low woodland and remnants of high bog. Current land use within the Proposed Wind Farm comprises peat cutting in areas of active turbary and natural recolonisation of degraded bog. Current land use along the Proposed Grid Connection comprises raised bog and land principally used by

agriculture. Land-use in the wider landscape of the site comprises a mix of agriculture, peat cutting, and low-density residential.

The production of energy from wind turbines has no direct emissions, unlike coal or oil-based power stations. Harnessing more energy by means of wind farms will reduce dependency on oil, gas and coal power stations, thereby resulting in a reduction in harmful emissions that can be damaging to human health and the environment. Some minor indirect emissions associated with the construction of the Proposed Project include vehicular and dust emissions.

11.1.2

Chapter Structure and Climate Study Areas

This chapter of the EIAR aims to provide an assessment of the potential significant direct and indirect effects on climate arising from all phases of the Proposed Project, as well as the vulnerability of the Proposed Project to changes in climate.

The chapter structure is as follows:

- A review of all relevant climate change legislation policy and guidance applicable to the Proposed Project in international, national, and local contexts (Section 11.2).
- Presentation of the baseline environment (Section 11.3 below), including:
 - A description of the current baseline environment established from desk study, utilising relevant datasets and data provided within other sections of the EIAR (Section 11.3.1 below).
 - A description of the future baseline environment established from desk study, utilising relevant datasets and data provided within other sections of the EIAR (Section 11.3.2 below).
- A detailed carbon assessment, which considers how the Proposed Project will affect Ireland's national greenhouse gas emissions as a result of its construction, operation, and decommissioning phase activities (inclusive of both carbon losses and carbon savings) (Section 11.4 below).
- Presents an assessment of the potential likely significant effects on climate arising from the Proposed Project during the construction phase (Section 11.5.2) operational phase (Section 11.5.3), and decommissioning phase (Section 11.5.4) based on the information gathered and the analysis and assessments undertaken.
 - All required mitigation measures to prevent, minimise, reduce or offset the likely significant environmental effects identified in the construction phase, operational phase, and decommissioning phase is provided in this section.
- An assessment of potential cumulative impacts is provided in Section 11.6 and details any potential cumulative effects on climate between the Proposed Project and other permitted or proposed projects and plans in the area (wind energy or otherwise) for the construction phase (Section 11.6.1), operational phase (Section 11.6.2), and decommissioning phase (Section 11.6.3).

By their very nature, the impacts and resulting effects of greenhouse gas emissions are global rather than affecting one localised area. For the purposes of the EIAR, the overall Climate Study Area for the Project is defined as the national environment (Ireland), where the receptor is the climate and the global atmosphere. As stated in the IEMA 2022 guidance *'greenhouse gas emission impacts and resulting effects are global rather than affecting one localised area'*¹. Therefore, effects arising from the potential impacts on climate are considered to impact on a national level. National, regional and local data has been considered where relevant and available. The study areas considered across the different assessments provided within this report are detailed below.

¹ IEMA (2022). *Assessing Greenhouse Gas Emissions and Evaluating their Significant*, 2nd Edition. Available online at: <https://www.iema.net/resources/blog/2022/02/28/launch-of-the-updated-eia-guidance-on-assessing-ghg-emissions>

Baseline Environment

- Current Baseline
 - Current Baseline Study Area: defined as the EIAR Site Boundary, defined in Section 1.1.1 of Chapter 1 of this EIAR. Relevant information taken from EIAR Chapters for inclusion in the current baseline assessment is within the relevant discipline's specific assessment boundary, as identified in each cited EIAR Chapter.
- Future Baseline
 - Future Baseline Study Area: defined as the EIAR Site Boundary, defined in Section 1.1.1 of Chapter 1 of this EIAR. Relevant information taken from relevant EIAR Chapters for inclusion in the future baseline assessment is within the relevant discipline's specific assessment boundary, as identified in each cited EIAR Chapter.

Carbon Assessment

- Carbon Assessment Study Area: defined as the EIAR Site Boundary, as defined in Section 1.1.1 of Chapter 1 of this EIAR.

11.1.3 Statement of Authority

This section of the EIAR has been prepared by Catherine Johnson, with input from Edel Mulholland, and reviewed by Ellen Costello and Sean Creedon, all of MKO. Catherine is a Project Environmental Scientist and Climate Practitioner at MKO with over three years of consultancy experience in climate, renewable energy, and sustainability. Prior to joining MKO in 2022, Catherine worked as an Environmental Social Governance (ESG) analyst for Acasta in Edinburgh. Catherine has expertise in international climate law and policy, earth science, and sustainability/ESG processes. Catherine has a BSc in Earth and Ocean Science and an LLM in Global Environment and Climate Change Law.

Edel Mulholland is an Environmental Scientist with MKO with over 1 year experience. Edel holds BA (Hons) in Environmental Science from the University of Galway. Prior to taking up her position with MKO in September 2024, Edel worked as an Environmental Chemistry Analyst with Complete Laboratory Solutions, Co. Galway, where she assisted with water quality analysis. Since joining MKO, Edel has assisted in the submission of several renewable energy developments. Edel's key strengths and areas of expertise are in environmental policy, drafting EIAR chapters, field work and QGIS mapping.

Ellen Costello is a Senior Environmental Scientist with MKO with over 6 years' experience in private consultancy. Ellen holds a BSc (Hons) in Earth Science, and a MSc (Hons) in Climate Change: Integrated Environmental and Social Science Aspects where she focused her studies on renewable energy development in Europe and its implications on environment and society. Ellen's key strengths and expertise are Environmental Protection and Management, Environmental Impact Statements, Project Management, and GIS Mapping and Modelling. Since joining MKO, Ellen has been involved in a range of renewable energy infrastructure projects. In her role as a senior project manager, Ellen works with and co-ordinates large multidisciplinary teams including members from MKO's Environmental, Planning, Ecological and Ornithological departments.

This report has been reviewed by Sean Creedon (B.Sc., M.Sc.). Sean has 23 years' experience in planning and environmental impact elements within all stages of wind farm project delivery.

11.2 Climate Legislation, Policy, and Guidance

Although variation in climate is thought to be a natural process, the rate at which the climate is changing has been accelerated rapidly by human activities. Climate change is one of the most challenging global issues facing the world today and is primarily the result of increased levels of greenhouse gases in the atmosphere. Increasing human emissions of carbon dioxide and other greenhouse gases cause a positive radiative imbalance at the top of the atmosphere, meaning energy is being trapped within the climate system. The imbalance leads to an accumulation of energy in the Earth system in the form of heat that is driving global warming.^{2,3} Greenhouse gases come primarily from the combustion of fossil fuels in energy use.

In March 2024 the European Environment Agency (EEA) published the European Climate Risk Assessment.⁴ This assessment states that Europe is the fastest warming continent on the planet and is warming at about the twice the global rate. The average global temperature in the 12-month period between February 2023 and January 2024 exceeding pre-industrial levels by 1.5°C. 2023 was the warmest year on record in more than 100,000 years, at 1.48°C above pre-industrial levels, with the world's ocean temperature also reaching new heights.

The Intergovernmental Panel on Climate Change (IPCC), in their AR6 Synthesis Report: Climate Change 2023⁵, state that widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred. This has led to widespread adverse impacts and related losses and damages to people and nature due to the pressures of climate change and the inability to adapt to a rapidly changing environment. Moving away from our reliance on coal, oil and other fossil fuel-driven power plants is essential to reduce emissions of greenhouse gases and combat climate change.

The relevant legislation, policy, and guidance in international (Section 11.2.1), national (Section 11.2.2), and local (Section 11.2.3) contexts are detailed below.

11.2.1 International Greenhouse Gas Emission and Climate Targets

Globally, governance relating to climate change has changed significantly since 1994 when the United Nations Framework Convention on Climate Change (UNFCCC) entered into force. Greenhouse gas emissions have been a primary focus of climate related international agreements for almost two decades.

Table 11-1 below identifies international instruments relating to greenhouse gas emissions and climate change targets. The following table provides an overview of the international agreements that have played key roles in establishing climate governance; please refer to Appendix 11-1 'Climate Legislation, Policy, and Guidance' for further detail on each of the below international instruments.

² Hansen, J.; Sato, M.; Kharecha, P. et al. *Earth's Energy Imbalance and Implications. Atmospheric Chemistry and Physics* 2011, 11 (24), 13421–13449. <https://doi.org/10.5194/acp-11-13421-2011>

³ von Schuckmann, K.; Palmer, M. D.; Trenberth, K. E. et al. *An Imperative to Monitor Earth's Energy Imbalance. Nature Clim Change* 2016, 6 (2), 138–144. <https://doi.org/10.1038/nclimate2876>.

⁴ European Environment Agency (2024) *European Climate Risk Assessment* <<https://www.eea.europa.eu/publications/european-climate-risk-assessment>>

⁵ IPCC AR6 Synthesis Report: *Climate Change 2023*. <https://www.ipcc.ch/report/sixth-assessment-report-cycle/>

Table 11-1 International Instruments Relating to Greenhouse Gases and Climate Change Targets

| International Instrument | Description |
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| Kyoto Protocol | <p>The Kyoto Protocol was adopted on 11 December 1997; this Protocol operationalised the UNFCCC and was the first international agreement that committed countries to reduce their greenhouse gas emissions. The Kyoto Protocol came into effect in 2005, as a result of which, emission reduction targets agreed by developed countries, including Ireland, became binding for the first time.</p> |
| Doha Amendment to the Kyoto Protocol | <p>In Doha, Qatar, on 8th December 2012, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:</p> <ul style="list-style-type: none"> ➤ New commitments for Annex I Parties to the Kyoto Protocol who agreed to take on commitments in a second commitment period from starting in 2013 and lasting until 2020. ➤ A revised list of greenhouse gases to be reported on by Parties in the second commitment period |
| <p>Conference of the Parties (COP):</p> <p><i>Every year since 1995, the Conference of the Parties (COP) has gathered the 196 Parties (195 countries and the European Union) that have ratified the Convention in a different country, to evaluate its implementation and negotiate new commitments, and is the supreme decision-making body of the UNFCCC.</i></p> | <p>COP30 – Belém (November 10th 2025 to November 21st 2025)</p> <p>COP30 in Belém, Brazil, focused on enhancing national climate plans known as Nationally Determined Contribution (NDCs) for 2035, aiming to increase adaptation finance and mobilize over a trillion annually for climate action.</p> <p>Key takeaways included a strong focus on the social dimension of climate action. While a formal, binding fossil fuel phase-out roadmap was not finalised, the summit advanced commitments and highlighted growing trade-climate tensions.</p> <p>COP21 – Paris (30th November to 12th December 2015)</p> <p>COP21 closed with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The 12-page text, made up of a preamble and 29 articles, provides for a limitation of the temperature rise to below 2°C above pre-industrial levels and even to tend towards 1.5°C.</p> <p>COP25 – Madrid (December 2nd to December 13th, 2019)</p> <p>At COP25 the European Union launched its most ambitious plan, ‘The European Green Deal’ which aims to lower CO₂ emissions to zero by 2050.</p> <p>COP28 – Dubai (30th of November 2023 to the 13th of December 2023)</p> <p>COP28 resulted in a landmark deal to ‘transition away’ from fossil fuels, the United Arab Emirates (UAE) Consensus. The agreement calls for ‘transitioning away from fossil fuels in energy systems, in a just, orderly, and equitable manner.’</p> <p>COP28 concluded the first ever Global Stocktake under the Paris Agreement. The Global Stocktake recognises that the world is not on track to meet 1.5°C and will require Parties to align their national targets and measures with the Paris Agreement.</p> <p>COP29 – Azerbaijan (11th November 2024 to 22nd November 2024)</p> <p>COP29 focused on accelerating global efforts to address climate change, in particular global efforts related to climate finance. The New Collective Quantified Goal on Climate Finance (NCQG) was agreed in the final days of COP with developed nations agreeing to triple finance to developing countries, with</p> |

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| | <p>commitments increasing from USD 100 billion annually to USD 300 billion annually by 2035.</p> <p>Significant progress was made in the discussions surrounding carbon markets, with nearly 200 nations agreeing on critical rules under Article 6 of the Paris Agreement. The adoption of these rules is seen as a crucial step towards operationalising a robust and credible carbon market. Despite the advances, concerns were expressed about the potential for weak governance and risks of exploitation in the system; these issues must be addressed to ensure the market's full functionality.</p> |
| <p>United Nations Sustainable Development Goals</p> | <p>On the 14th July 2025, the United Nations published 'The Sustainable Development Goals Report 2025' this report finds that, following an assessment of all 169 targets, for which trend data is available, only 17% of the SDG targets are on track, 18% of SDG targets are showing minimum or moderate progress, 47% having stalled in progress and 18% having regressed from 2024.</p> |
| <p>Climate Change Performance Index</p> | <p>Established in 2005, the Climate Change Performance Index (CCPI)⁶ is an independent monitoring tool which tracks individual countries climate protection performance.</p> <p>Ireland, ranked 43rd in 2024, has risen 14 places to 29th for 2025, and is now considered a 'medium' performer in international performance. The CCPI states that Ireland's policies are missing a long-term strategy for phasing out fossil fuel infrastructure and shifting investments from natural gas towards an emissions-neutral energy supply.</p> |
| <p>State of the Global Climate 2024</p> | <p>In March 2025, the World Meteorological Organisation (WMO) published a report entitled the 'State of the Global Climate 2024'. This report provided a summary on the state of the climate indicators in 2023 with sections on key climate indicators, extreme events and impacts. The key messages in the report include:</p> <ul style="list-style-type: none"> ➤ Greenhouse gases reached record observed levels in 2023. Real-time data indicate that the level of greenhouse gases continued to rise in 2024. ➤ The annually averaged global mean near-surface temperature in 2024 was 1.55 °C ± 0.13 °C above the 1850–1900 average used to represent pre-industrial conditions. |
| <p>Renewable Energy Directive</p> | <p>The first Renewable Energy Directive (RED)⁷ is legislation that influenced the growth of renewable energy in the EU and Ireland for the decade ending in 2020.</p> <p>From 2021, RED was replaced by the second Renewable Energy Directive (REDII),⁸ which continues to promote the growth of renewable energy out to 2030. REDII introduced a binding EU-wide target for overall RES of 32% in 2030 and requires Member States to set their national contributions to the EU-wide target. Per the National Energy and Climate Plan (NECP) 2021-2030, Ireland's overall RES target is 34.1% in 2030.</p> <p>Given the need to ratchet up the EU's clean energy transition, RED was revised in 2023, and the amending Directive EU/2023/2413 (REDIII)⁹ entered into force on 20 November 2023 and was transposed into Irish Law in August 2025. REDIII</p> |

⁶ Climate Change Performance Index 2024 <<https://ccpi.org>>

⁷ Directive 2009/28/EC on the promotion of the use of energy from renewable sources. Available from: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:140:0016:0062:en:PDF>

⁸ Directive (EU) 2018/2001 on the promotion of the use of energy from renewable resources (recast). Available from: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32018L2001>

⁹ Directive (EU) 2023/2413 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources and repealing Council Directive (EU) 2015/652. Available from: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L_202302413

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| | amended the EU-wide overall 2030 RES target from 32% to at least 42.5% with the aim of 45%. |
| European Green Deal | <p>The European Green Deal is a comprehensive package of policy initiatives aimed at achieving climate neutrality across the EU by 2050.</p> <p>It features a wide range of actions and targets in different sectors such as energy, transport, industry, environment and agriculture. The goal is to transform the EU into a resource-efficient, competitive, circular economy that is fair and inclusive for every individual and region.</p> <p>In its approach to decarbonisation, the EU has split greenhouse gas emissions into two categories, the Emissions Trading System (ETS) and the non-ETS. Under the EU Green Deal, the targets for the ETS and non-ETS sectors will be revised upwards in order to achieve the commitment, at EU level, to reach an economy-wide 2030 reduction in emissions of at least 55%, compared to 1990 levels.</p> |
| Council Regulation (EU) 2022/2577 and 2024/223 | <p>Council Regulation (EU) 2022/2577 and 2024/223 lay down a framework to accelerate the deployment of renewable energy. Regulation 2022/2577 and 2024/223 recognises the relative importance of renewable energy deployment in the current difficult energy context and provides significant policy and legislative support to enabling renewable energy projects.</p> <p>Further detail is provided in Section 1.1.1.8 of Appendix 11-1 and in Section 2.3.1 in Chapter 2 of this EIAR.</p> |
| EU Nature Restoration Law | <p>The Nature Restoration Law is the first continent-wide, comprehensive law of its kind. It is a key element of the EU Biodiversity Strategy, which sets binding targets to restore degraded ecosystems, in particular those with the most potential to capture and store carbon and to prevent and reduce the impact of natural disasters.</p> <p>The law aims to restore ecosystems, habitats and species across the EU's land and sea areas in order to:</p> <ul style="list-style-type: none"> ➤ Enable the long-term and sustained recovery of biodiverse and resilient nature; ➤ Contribute to achieving the EU's climate mitigation and climate adaptation objectives; and ➤ Meet international commitments. <p>The EU Nature Restoration Law was approved on June 17th, 2024. EU countries are expected to submit National Restoration Plans to the Commission within two years of the Regulation coming into force (by mid-2026), showing how they will deliver on the targets. They will also be required to monitor and report on their progress.</p> |
| EU Effort Sharing Regulation | <p>Emissions from all other sectors, including agriculture, transport, buildings, and light industry are covered by the EU Effort Sharing Regulation (ESR). This established binding annual greenhouse gas emission targets for Member States for the period 2021–2030. Ireland is required to reduce its emissions from these sectors by 30% by 2030, relative to 2005 levels. Please see Section 1.1.1.10 of Appendix 11-1 for further details on the EU ESR.</p> |

11.2.2 National Greenhouse Gas Emission and Climate Targets

Ireland has reached a crucial point in addressing climate change with a goal to becoming climate neutral by 2050 and to significantly cut greenhouse gases by 2030. National greenhouse gas emission and climate targets are critical for achieving Ireland's climate ambitions.

Table 11-2 below provides an overview of the national legislation and reports relating to greenhouse gases and climate change targets in Ireland; please refer to Appendix 11-1 for further detail on each of the below national legislation measures.

Table 11-2 National Legislation and Reports relating to Greenhouse Gas Emission and Climate Change Targets

| National Instrument | Description |
|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Programme for the Government - Securing Irelands Future | The Programme for Government – Securing Irelands Future was published in January 2025. The programme notes that the government are committed to reducing greenhouse gas emissions by an average 7% per annum over the next decade in a push to achieve a net zero emissions by the year 2050. The Programme states the Government’s ongoing support and commitment to take “ <i>the necessary action to deliver at least 70% renewable electricity by 2030</i> ”. |
| Climate Action and Low Carbon Development Act 2015 | The Climate Action and Low Carbon Development Act 2015 established the national framework for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a low carbon, climate resilient and environmentally sustainable economy. |
| Climate Action and Low Carbon Development (Amendment) Act 2021 | <p>The Climate Action and Low Carbon (Amendment) Act 2021, amended the Climate Action and Low Carbon Development Act 2015 and is a piece of legislation which commits the country to move to a climate resilient and climate neutral economy by 2050. This was passed into law in July 2021.</p> <p>The Programme for Government has committed to a 7% average yearly reduction in overall greenhouse gas emissions over the next decade, and to achieve net zero emissions by 2050. This Act will manage the implementation of a suite of policies to assist in achieving these annual targets.</p> |
| Climate Change Advisory Council | The Climate Change Advisory Council (CCAC) was established on 18th January 2016 under the Climate Action and Low Carbon Development Act 2015. The Annual Review 2025: Electricity report has been released by the CCAC and focuses specifically on key findings and recommendations for the Electricity sector. In 2024, emissions from the sector reduced by approximately 7.3% from 2023. Ireland’s carbon intensity of electricity generation is higher than the EU average due to continued reliance on coal and oil, which are estimated to have contributed 13.4% and 3.1% of total electricity emissions for 2024, while accounting for only 3.2% and 0.7% of indigenous generation, respectively. |
| Carbon Budgets | The first national carbon budget programme proposed by the CCAC, approved by Government and adopted by both Houses of the Oireachtas in April 2022 comprises three successive 5-year carbon budgets. The total emissions allowed under each budget are shown in Section 1.1.2.4 of Appendix 11-1. |
| Sectoral Emission Ceilings | <p>The Sectoral Emissions Ceilings were launched in September 2022. The Sectoral Emissions Ceilings alongside the annual published Climate Action Plan provide a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030.</p> <p>The Sectoral Emission Ceilings for each 5-year carbon budget period was approved by the government on the 28th of July 2022 and is shown in Section 1.1.2.5 of Appendix 11-1.</p> |
| Climate Action Plan 2025 | The National Climate Action Plan (CAP) 2025 was launched in April 2025. CAP 2025 sets out the roadmap to deliver on Ireland’s climate ambition. It aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022 following the Climate Action and Low Carbon Development (Amendment) Act 2021, which commits Ireland to a legally binding target of net-zero greenhouse gas emissions no later than 2050, and a reduction of 51% by 2030. |

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|--------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>CAP 2025 highlights the firm commitment that has been made by Ireland in relation to the clean energy transition and provides an outline of precise goals for renewable energy, focusing on solar, onshore wind, and offshore wind.</p> |
| <p>Ireland's Climate Change Assessment</p> | <p>In 2023 the EPA published Ireland's Climate Change Assessment (ICCA). This assessment provides a comprehensive overview and breakdown of the state of knowledge around key aspects of climate change with a focus on Ireland. The ICCA report is presented in four volumes:</p> <ul style="list-style-type: none"> ➤ Volume 1: Climate Science – Ireland in a Changing World; ➤ Volume 2: Achieving Climate Neutrality in 2050; ➤ Volume 3: Being Prepared for Ireland's Future; and ➤ Volume 4: Realising the Benefits of Transition and Transformation. <p>Please refer to Section 1.1.2.7 of Appendix 11-1 for further information on the ICCA.</p> |

11.2.3 Local Greenhouse Gas Emission and Climate Targets

11.2.3.1 Offaly County Council Local Authority Climate Action Plan 2024-2029

The Offaly County Council Local Authority Climate Action Plan 2024-2029¹⁰ (Offaly LACAP) was adopted in February 2024 and published in April of the same year.

The Offaly LACAP highlights the current state of climate action in Ireland, and how Offaly County Council intends to deliver and enable climate action for a just transition to a low carbon and climate resilient future within County Offaly. The Offaly LACAP will help address the mitigation of greenhouse gases, the implementation of climate change adaptation measures, and will strengthen the alignment between national climate policy and the delivery of effective local climate action.

Overall, the greenhouse gas emissions generated from County Offaly equated to 1,450,877 tonnes of carbon dioxide equivalent (tCO₂e) in the baseline year of 2018. The top three emitting sectors within County Offaly in terms of total greenhouse gas emissions in the baseline year were agriculture, residential and transport producing 47%, 17%, and 17% of total emissions respectively. Offaly County Council, along with all public sector entities must reduce greenhouse gas emissions by 51% by 2030 as compared to 2018 in line with the National Climate Action Plan 2025 (CAP25) (Section 11.2.2 above).

Strategic Goal 2 of the Offaly LACAP is to '*achieve [Offaly's] carbon emission and energy efficiency targets for 2030 and 2050*' and Strategic Goal 3 is to '*deliver on climate adaptation and climate resilience.*' These goals are designed to ensure that local authorities adhere to carbon budgets and collaborate as a sector to achieve their 2030 and 2050 targets and adapt their buildings, infrastructure and natural environment to the changing climate to increase the climate resilience of their county. The Offaly LACAP assesses climate risk relevant to Ireland and to County Offaly; the Offaly LACAP, in conjunction with the evidence baseline, inform the climate objectives and actions that will be undertaken by Offaly County Council to assist in the achievement of national and international climate targets.

Once operational, the Proposed Project will assist in reducing greenhouse gas emissions by enabling renewable energy to be fed into the national grid, thereby reducing the overall carbon intensity of Ireland's electricity supply. This will, in turn, support the decarbonisation of other sectors, particularly the main emitting sectors in County Offaly as identified above. Please see Section 11.4.3.2 below for further information on carbon savings associated with the Proposed Project.

¹⁰ Offaly County Council Climate Action Plan 2024-2029 (2024). Available at: <https://www.offaly.ie/app/uploads/Offaly-CoCo-Climate-Action-Phase-Two-English-Digital.pdf>

The Adopted Offaly County Development Plan 2021-2027¹¹ sets out the overall strategy for the proper planning and sustainable development of the County over a 6-year period. Key components of the County Development Plan are the settlement strategy, housing strategy and renewable energy strategy for the county; please refer to Section 2.6.4.1 of Chapter 2 of this EIAR for more details.

11.2.4 Relevant Guidance

The climate chapter of this EIAR is carried out in accordance with the ‘EIA Directive’ as amended by Directive 2014/52/EU and has been prepared in accordance with guidance listed in Section 1.7.2 of Chapter 1: Introduction. Due to the nature of the Proposed Project, a wind farm project, the following methodology and guidance was also utilised for the climate section of this EIAR:

- ‘Guidance on Integrating Climate Change and Biodiversity into Environmental Impact Assessment’ (European Commission, 2013);
- *Environmental Impact Assessment Guide to Climate Change Resilience and Adaptation* (Institute of Environment Management and Assessment (IEMA), 2020);
- ‘Calculating Carbon Savings from Wind Farms on Scottish Peat Lands’ (University of Aberdeen and the Macauley Institute, 2008);
- ‘Wind Farms and Carbon Savings’ (Scottish Natural Heritage, 2003);
- Macauley Institute Carbon Calculator for Wind Farms on Scottish Peatlands (Version 2.15.0) (Macauley Institute, 2023); and
- Transport Infrastructure Ireland (TII) Carbon Assessment Tool (Version 0.9.1) (TII, 2020).

Consideration has also been given to the ‘Air Quality Assessment of Proposed National Roads – Standard PE-ENV-01107’ (Transport Infrastructure Ireland, December 2022 (2022a)), Climate Assessment of Proposed National Roads – Standard and Overarching Technical Documentation (Transport Infrastructure Ireland, December 2022b/c) and TII Carbon Tool for Road and Light Rail Projects: User Guidance Document, GE-ENV-01106 (TII, 2022d).

11.3 Climate and Weather

Climate change projections show that the Earth is getting warmer and extreme weather events are increasing in frequency on an annual basis. The Proposed Project will assist in mitigating these effects through the deployment of clean renewable energy to the national grid and subsequent decarbonisation of energy systems. Changes to climate and weather in Ireland will occur as a result of climate change, for further details on the vulnerability of the Proposed Project to Climate please refer to Chapter 16.

11.3.1 Baseline Environment

11.3.1.1 Data Sources

A review of literature and data relating to climate change in Ireland was undertaken and utilised to provide an overview of the current baseline environment. The following key data sources were reviewed:

- Met Éireann 30-Year Averages¹²;
- Irelands Climate Averages 1991-2020 Summary Report¹³;

¹¹ *Offaly County Development Plan 2021-2027 (2021)*. Available at: < <https://www.offaly.ie/c/county-development-plan/> >

¹² *Met Éireann 30-Year Averages* < <https://www.met.ie/climate/30-year-averages/> >

¹³ *Department of Housing, Local Government and Heritage (2024) Irelands Climate Averages 1991-2020 Summary Report* < https://edepositireland.ie/bitstream/handle/2262/108695/Ireland%27s_climate_averages_1991-2020_rev2.pdf?sequence=1&isAllowed=y >

- Ireland's National Inventory Report 2025¹⁴;
- Climate Status Report for Ireland 2020¹⁵; and
- Annual Review 2025 – Our Changing Climate in 2024¹⁶.

11.3.1.2 Physical Environment

Ireland has a temperate, oceanic climate, resulting in mild winters and cool summers. Met Éireann provides 30-year weather averages for Ireland at specific weather stations throughout Ireland. The closest weather and climate monitoring station to the Current Baseline Study Area that has meteorological data recorded for a 30-year period is Birr weather station, located approximately 23km southwest to the Proposed Wind Farm at its closest point (T03). Meteorological data recorded at Birr over the 30-year period from 1979-2008 is shown in Table 11-3 below. The wettest months are October and December, with February and April being the driest. July is the warmest month with an average temperature of 15.6° Celsius.

More recent, monthly meteorological data recorded at Gurteen, Co Tipperary, located approximately 31km southwest of the site, from January 2023 to January 2026 is available at <https://www.met.ie/climate/available-data/monthly-data>. July 2023 was the wettest month in this time period, with 206mm of rainfall recorded, while February 2023 the driest month with 21.7mm of rainfall. July 2025 and August 2025 were the warmest months in this time period, with a mean monthly temperature of 16.5° Celsius. January 2024 was the coldest month with a mean monthly temperature of 4.4° Celsius.

Table 11-4 below provides a summary of the current physical baseline environment with reference to relevant chapters within the submitted EIAR where further information is available.

¹⁴ EPA (2025) Ireland's National Inventory Report <<https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/Ireland's-NID-2025.pdf>>

¹⁵ EPA (2021) Climate Status Report for Ireland 2020 <<https://www.epa.ie/publications/research/climate-change/research-386-the-status-of-irelands-climate-2020.php>>

¹⁶ Climate Change Advisory Council (2025) Annual Review 2025 – Our Changing Climate in 2024 <<https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC%20AR25%20Our%20Changing%20Climate-final.pdf>>

Table 11-3 Data from Met Éireann Weather Station at Birr 1979-2008

| | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Year |
|--------------------------------------------|-------|------|------|------|------|------|------|------|------|------|------|------|-------|
| TEMPERATURE (degrees Celsius) | | | | | | | | | | | | | |
| Mean daily max. | 8.1 | 8.6 | 10.3 | 12.6 | 15.5 | 17.8 | 19.6 | 19.3 | 17.1 | 13.6 | 10.4 | 8.6 | 13.5 |
| Mean daily min. | 2.0 | 2.0 | 3.3 | 4.3 | 6.6 | 9.5 | 11.6 | 11.3 | 9.3 | 6.6 | 4.0 | 2.7 | 6.1 |
| Mean temperature | 5.1 | 5.3 | 6.8 | 8.4 | 11.0 | 13.6 | 15.6 | 15.3 | 13.2 | 10.1 | 7.2 | 5.6 | 9.8 |
| Absolute max. | 14.3 | 15.5 | 18.6 | 23.2 | 25.7 | 29.7 | 30.8 | 29.4 | 25.6 | 20.4 | 17.5 | 15.3 | 30.8 |
| Absolute Min. | -14.6 | -7.1 | -7.8 | -4.7 | -2.3 | 0.2 | 3.7 | 2.0 | -1.1 | -5.2 | -6.9 | -8.6 | -14.6 |
| Mean No. of Days with Air Frost | 8.2 | 7.7 | 4.9 | 3.5 | 0.9 | 0.0 | 0.0 | 0.0 | 0.2 | 1.6 | 4.8 | 7.0 | 38.8 |
| Mean No. of Days with Ground Frost | 16.0 | 15.0 | 13.0 | 12.0 | 7.0 | 1.0 | 0.0 | 0.0 | 2.0 | 6.0 | 11.0 | 15.0 | 98.0 |
| RELATIVE HUMIDITY (%) | | | | | | | | | | | | | |
| Mean at 0900UTC | 89.8 | 88.9 | 86.9 | 81.5 | 77.7 | 78.3 | 80.9 | 84.2 | 86.6 | 89.1 | 90.9 | 90.3 | 85.4 |
| Mean at 1500UTC | 82.4 | 75.6 | 71.6 | 65.1 | 64.7 | 66.2 | 67.5 | 68.5 | 70.3 | 76.1 | 81.1 | 84.5 | 72.8 |
| SUNSHINE (Hours) | | | | | | | | | | | | | |
| Mean daily duration | 1.5 | 2.2 | 2.9 | 4.5 | 5.1 | 4.3 | 3.9 | 4.0 | 3.5 | 2.9 | 1.9 | 1.4 | 3.2 |
| Greatest daily duration | 7.7 | 9.4 | 10.5 | 13.0 | 15.1 | 15.7 | 15.2 | 13.6 | 11.5 | 9.7 | 8.5 | 6.9 | 15.7 |
| Mean no. of days with no sun | 11.0 | 7.1 | 5.8 | 2.9 | 2.2 | 2.9 | 2.5 | 2.5 | 3.5 | 6.2 | 8.8 | 12.0 | 67.4 |
| RAINFALL (mm) | | | | | | | | | | | | | |
| Mean monthly total | 78.8 | 58.6 | 67.4 | 55.0 | 59.5 | 66.5 | 59.4 | 81.6 | 66.4 | 94.2 | 74.7 | 83.8 | 845.7 |
| Greatest daily total | 39.2 | 28.0 | 22.0 | 26.3 | 19.7 | 41.1 | 44.5 | 59.1 | 35.7 | 32.3 | 29.7 | 37.5 | 59.1 |
| Mean num. of days with $\geq 0.2\text{mm}$ | 19 | 15 | 19 | 15 | 16 | 16 | 16 | 18 | 17 | 19 | 18 | 18 | 206 |
| Mean num. of days with $\geq 1.0\text{mm}$ | 14 | 11 | 14 | 11 | 12 | 11 | 11 | 12 | 11 | 14 | 13 | 13 | 147 |
| Mean num. of days with $\geq 5.0\text{mm}$ | 5 | 4 | 4 | 3 | 4 | 4 | 3 | 5 | 4 | 6 | 5 | 6 | 53 |
| WIND (knots) | | | | | | | | | | | | | |
| Mean monthly speed | 7.9 | 8.0 | 7.8 | 6.5 | 6.2 | 5.8 | 5.6 | 5.6 | 6.0 | 6.8 | 7.0 | 7.5 | 6.7 |
| Max. gust | 75 | 77 | 64 | 58 | 55 | 49 | 49 | 46 | 51 | 64 | 54 | 69 | 59.2 |
| Max. mean 10-minute speed | 40 | 38 | 33 | 29 | 29 | 27 | 24 | 27 | 30 | 37 | 32 | 38 | 32 |
| Mean num. of days with gales | 0.2 | 0.2 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.1 | 0.5 |
| WEATHER (Mean No. of Days With:) | | | | | | | | | | | | | |

| | | | | | | | | | | | | | |
|-----------------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|------|
| Snow or sleet | 3.5 | 2.6 | 2.5 | 0.8 | 0.2 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.2 | 1.9 | 11.7 |
| Snow lying at 0900UTC | 2.0 | 0.6 | 0.7 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.0 | 0.3 | 3.7 |
| Hail | 0.6 | 0.8 | 1.8 | 2.0 | 0.9 | 0.1 | 0.0 | 0.2 | 0.1 | 0.2 | 0.3 | 0.3 | 7.3 |
| Thunder | 0.1 | 0.1 | 0.2 | 0.3 | 0.4 | 0.8 | 0.9 | 0.5 | 0.3 | 0.1 | 0.2 | 0.1 | 3.9 |
| Fog | 2.1 | 1.3 | 1.1 | 1.5 | 1.1 | 0.8 | 1.1 | 1.8 | 2.5 | 2.1 | 1.9 | 2.9 | 20.4 |

Table 11-4 Summary of Current Physical Baseline Environment

| Climate variable | Summary of current baseline environment | Relevant EIAR chapter (if applicable) |
|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Air Temperature | <p>Climate change is impacting air temperatures in the Northern European region, with a range of observable effects including rising temperature, increased frequency of heatwaves, changes in seasonal temperature patterns and milder winters¹⁷.</p> <p>Ireland's Climate Averages 1991-2020 Summary Report identifies that the annual mean air temperature for Ireland over the period 1991-2020 is 9.8°C. The annual mean air temperature ranges from approximately 8.5°C - 10.8°C. Comparing the 1991-2020 annual mean air temperature for Ireland with that of the 1961-1990 period, there has been an increase of approximately 0.7°C.</p> <p>The Climate Status Report for Ireland 2020¹⁸ states that air temperatures in Ireland have '<i>been increasing at an average rate of 0.078°C per decade since 1900 and that the annual average temperature is now approximately 0.9°C higher than it was in the early 1900s</i>'. Temperatures in Ireland are increasing, with 16 of the top 20 warmest years on record occurring since 1990¹⁹. On 10th July 2024 Met Éireann confirmed that 2023 was Ireland's wettest and warmest year on record (with records dating back to 1900).²⁰</p> | Chapter 10: Air Quality |

¹⁷ IPCC (2021) Climate Change 2021: The Physical Science Basis <https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_FullReport.pdf>

¹⁸ Government of Ireland (2020) Climate Status Report for Ireland 2020 <https://www.epa.ie/publications/research/climate-change/Research_Report_386.pdf>

¹⁹ Irelands Climate Change Assessment (2023) Volume 1 Climate Science – Ireland in a Changing World <<https://www.epa.ie/publications/monitoring-assessment/climate-change/irelands-climate-change-assessment-volume-1.php>>

²⁰ <https://www.met.ie/2023-confirmed-as-irelands-wettest-year-on-record>

| Climate variable | Summary of current baseline environment | Relevant EIAR chapter (if applicable) |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| | <p>Due to the moderating influence of the North Atlantic, Ireland has, and will continue to, experience much milder air temperatures as compared to mainland Europe and other continental countries²¹. However, this moderating influence could be in jeopardy if the Atlantic Meridional Overturning Circulation (AMOC) continues to weaken²². The AMOC is a large system of ocean currents responsible for carrying warm water from the tropics into the North Atlantic and the strength of this current is a function of global mean temperature. The weakening of this current would counterbalance the warming effects of climate change creating instability for local ecosystems, agriculture, and fisheries.</p> | |
| Precipitation | <p>Climate change is impacting precipitation patterns in the Northern European region, with a range of observable effects including increased precipitation, more extreme precipitation events, seasonal variations and impacts on hydrological regimes²³.</p> <p>Precipitation has been measured systematically in Ireland since the late 19th century and is a key indicator of changes in the climate; measurements and analysis of rainfall are essential for assessing the effects of climate change on the water cycle, water balance and for flood mitigation. Met Éireann highlights that it is already observing these trends, with the national annual average rainfall over the period 1991-2020 being approximately 1,288mm, which represents an increase of 7% from the previous 30-year monitoring period (1961-1990)²⁴.</p> <p>Ireland's Climate Averages 1991-2020 Summary Report obtained averages for the annual, seasonal and monthly number of rain days (number of days with rainfall ≥ 0.2 mm), wet days (number of days with rainfall ≥ 1 mm) and very wet days (number of days with rainfall ≥ 10 mm). Over the period 1991-2020, on an annual basis, the average number of rain days ranges from 201 days to 272 days; the average number of wet days ranges from 147 days to 226 days; and the average number of very wet days ranges from 22 days to 68 days.</p> | <p>Further detail on rainfall and evaporation data is provided in Section 9.3.2 in Chapter 9: Water.</p> |

²¹ <https://www.met.ie/climate/what-we-measure/temperature#:~:text=The%20moderating%20influence%20of%20the,mild%20winters%20and%20cool%20summers.>

²² IPCC (2019) IPCC Special Report on the Ocean and Cryosphere in a Changing Climate Chapter 6. Extremes, Abrupt Changes, and Managing Risk <https://www.ipcc.ch/site/assets/uploads/sites/3/2022/03/08_SROCC_Ch06_FINAL.pdf>

²³ IPCC (2021) Climate Change 2021: The Physical Science Basis <https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_FullReport.pdf>

²⁴ Department of Housing, Local Government and Heritage (2024) Irelands Climate Averages 1991-2020 Summary Report <<https://edepositireland.ie/handle/2262/108695>>

| Climate variable | Summary of current baseline environment | Relevant EIAR chapter (if applicable) |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Wind and Storms | <p>Climate change is impacting wind patterns in the Northern European region with a range of observable effects including increased wind speeds, changes in wind direction and seasonal variations²⁵.</p> <p>Ireland's Climate Averages 1991-2020 Summary Report identifies that the annual mean hourly wind speed ranges from 9 knots at Shannon Airport to 15 knots at Malin Head. Winds are generally strongest in the northwest of the country. The strongest winds are observed during the winter months and range from 10 knots at Shannon Airport to 18 knots at Malin Head. The lightest winds are observed during the summer months and range from 8 knots at Valentia Observatory to 13 knots at Malin Head.</p> <p>In late 2023 and early 2024, Ireland experienced a very active storm season; the county was affected by 13-14 severe storms²⁶. In Ireland, the storm naming season begins on 1st September each year and ends on the 31st August the following year. In the 2024/2025 storm season there were 6 no. named storms, with Storm Eowyn, occurring in January 2025, reaching hurricane force winds (maximum wind speed recorded as 184km/h). At the time of writing there have been four named storms in the 2025/2026 storm season.²⁷</p> <p>The increased frequency and intensity of storm events will lead to associated increases in precipitation (see above). As stated in 'Air Temperature' above, the AMOC has a moderating influence on Europe. However, as identified by the IPCC, the strength of the AMOC is directly correlated to global mean temperature, and as global mean temperature increases, the AMOC will weaken²⁸. The weakening of this current would result in increased storm activity in Northern Europe.</p> | N/A |

²⁵ IPCC (2021) *Climate Change 2021: The Physical Science Basis* <https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_FullReport.pdf>

²⁶ Met Éireann (2024) *Human-caused Climate Change Brings Increased Storm Rainfall* <<https://www.met.ie/human-caused-climate-change-brings-increased-storm-rainfall>>

²⁷ <https://www.met.ie/climate/storm-centre>

²⁸ IPCC (2019) *IPCC Special Report on the Ocean and Cryosphere in a Changing Climate Chapter 6. Extremes, Abrupt Changes, and Managing Risk* <https://www.ipcc.ch/site/assets/uploads/sites/3/2022/03/08_SROCC_Ch06_FINAL.pdf>

11.3.1.3 Existing Greenhouse Gas Emissions

Greenhouse gas emissions arise from a large majority of anthropogenic activities. The main sectors which release emissions in Ireland are detailed in Section 1.1.2.5 of Appendix 11-1 Climate Legislation Policy and Guidance. These sectors include:

- > Electricity;
- > Transport;
- > Built Environment;
 - Residential
 - Commercial
- > Industry;
- > Agriculture;
- > Land Use, Land Use Change, and Forestry (LULUCF)¹;
- > Other (F-Gases, Waste, Petroleum refining); and
- > Unallocated savings.

The most recent inventory report for Ireland, National Inventory Report 2025 (NIR 2025)²⁹, was published in 2025 and refers to the greenhouse gas inventory timeseries for the years 1990-2023. From 1990-2001, total emissions of greenhouse gases (excluding LULUCF) increased steadily from 55,734.9 ktCO_{2e} in 1990 to 70,848.8 ktCO_{2e} in 2001, which is the highest level of greenhouse gas emissions ever reported in Ireland. Emissions then plateaued until 2008 with estimates ranging from 70,149.9 ktCO_{2e} to 67,927 ktCO_{2e}. There was then a sharp decrease from 67,927 ktCO_{2e} in 2008 to 57,836.3 ktCO_{2e} in 2011. The declining trend between 2008 and 2011 is largely attributable to a slowing down of the previously sustained increase in transport emissions, coupled with the 2008 financial crisis. In 2023, total emissions of greenhouse gases including indirect emissions from solvent use (excluding LULUCF) in Ireland were 54,934.4ktCO_{2e}, which is 6.8% lower than emissions in 2022, and the lowest level in the time series.

The Electricity sector accounted for the bulk of the CO₂ emissions in 2023 (57.1%), Agriculture contributed 36.2%, while a further 5.2% emanated from Industrial Processes and Product Use and 1.5% was due to Waste. Emissions of CO₂ accounted for 61.1% of the national total in 2023, with CH₄ and N₂O contributing 28.9% and 8.8%, respectively. The combined emissions of fluorinated gases (HFC, PFC, SF₆ and NF₃) accounted for 1.2% of total emissions in 2023.³⁰

11.3.2 Future Environment

Ireland is experiencing climate change in line with global trends, with current projections, detailed below, indicating that these effects will intensify in the coming decades. The baseline environment, detailed above, will undergo significant shifts, influencing Ireland's environment, economy, and society. Predicted changes include rising temperatures, altered precipitation patterns, and increased frequency of extreme weather events.

Visible changes in global climate are evident worldwide, with climate change projections suggesting further, more pronounced impacts in the future. These impacts will have wide-ranging effects on both natural and man-made environments across various sectors and regions, resulting in socio-economic repercussions. Referred to as the 'costs of inaction,' these economic impacts of climate change are increasingly influencing policy discussions³¹. It has become clear that even if greenhouse gas emissions

²⁹ EPA (2024) National inventory Report 2025 <<https://www.epa.ie/publications/monitoring-assessment/climate-change/air-emissions/Ireland's-NID-2025.pdf>>

³⁰ Ibid.

³¹ European Environment Agency (2007) Climate change: the cost of inaction and the cost of adaptation <https://www.eea.europa.eu/publications/technical_report_2007_13/download>

were to cease immediately, climate alterations would persist for many decades. Therefore, alongside efforts for mitigation, it is imperative to develop effective adaptation to mitigate damages or seize opportunities arising from climate change.

This section provides a description of the future predictions for climate change.

11.3.2.1 Data sources

A review of literature and data relating to climate change in Ireland was undertaken and utilised to provide an overview of the future baseline environment. The following key data sources were reviewed:

- High-resolution Climate Projections for Ireland – A Multimodel Ensemble Approach (report No. 339)³²;
- Climate Status Report for Ireland 2020³³; and
- Climate Ireland³⁴.

11.3.2.2 Physical environment

This section will describe the future baseline for the Site’s physical environment under the Representative Concentration Pathways (RCP) 8.5 high emission scenario. RCPs represent climate change scenarios used in modelling the possible future climate evolution, and are based on a wide suite of assumptions, to specify the greenhouse gas concentrations that will result in defined radiative forcing by 2100. The RCP 8.5 combines assumptions about high population and relatively slow income growth with modest rates of technological change and energy intensity improvements, leading in the long term to high energy demand and greenhouse gas emissions in absence of climate change policies. Compared to the total set of RCPs, RCP 8.5 thus corresponds to the pathway with the highest greenhouse gas emissions³⁵. The physical environment of the Proposed Project under the RCP 8.5 scenario is discussed under the following headers:

- Air Temperature
- Precipitation and Flood Risk
- Wind and Storms

Air Temperature

Annual surface air temperatures³⁶ in Ireland are now approximately 1 °C higher than they were in the early 1900s (2013 - 2022 period relative to 1903 - 1912). The upward trend in air temperatures is predicted to continue for all seasons: annual air temperatures may increase by over 3 °C by the end of the 21st century relative to a 1976 to 2005 reference period under an RCP 8.5 high emission scenario³⁷.

Met Éireann projections³⁸ indicate an increase of 1–1.6 °C in mean annual temperatures in Ireland, with the largest increases seen in the east of the country. Warming is enhanced for the extremes (i.e., hot or cold days), with highest daytime temperatures projected to rise by 0.7–2.6 °C in summer and lowest night-time temperatures to rise by 1.1–3 °C in winter. Averaged over the whole country, the number of

³² EPA Research (2020) *High-resolution Climate Projections for Ireland – A Multimodel Ensemble Approach*
<https://www.epa.ie/publications/research/climate-change/Research_Report_339_Part1.pdf>

³³ https://www.epa.ie/publications/research/climate-change/Research_Report_386.pdf

³⁴ <https://www.climateireland.ie/>

³⁵ *Climate Change (2011) A scenario of comparatively high greenhouse gas emissions*
<<https://link.springer.com/article/10.1007/s10584-011-0149-y>>

³⁶ <https://www.epa.ie/publications/monitoring-assessment/climate-change/irelands-climate-change-assessment-volume-1.php>

³⁷ *Ireland's Climate Change Assessment (2023) Volume 1 Climate Science – Ireland in a Changing World*

³⁸ <https://www.met.ie/climate/climate-change>

frost days (days when the minimum temperature is less than 0°C) is projected to decrease by 62% for the RCP 8.5 high emissions scenario^{39,40}.

Precipitation and Flood Risk

Climate change is expected to have a significant impact on Ireland's precipitation patterns. Ireland is predicted to experience greater seasonality in precipitation, with more extreme fluctuations between wet and dry periods. Winter and autumn are anticipated to see increased rainfall, while spring and summer are projected to become drier, leading to more frequent droughts. The EPA's climate projections indicate that very wet days (i.e., days with more than 30mm of rainfall) will become more common, increasing by 31% under a high emissions scenario (RCP 8.5).

Due to Ireland's location in the west of Europe, exposure to Atlantic storms is of concern and this is particularly the case in the context of rising sea levels which will enhance the impacts of storm surges.⁴¹

Extreme rainfall events, such as those currently expected only once every 50 years, could become twice as frequent by the end of the century. This means more frequent flooding risks, particularly during the winter months⁴². Further information on flood risk is presented in the section below.

Flood Risk

Chapter 9: Water, and the accompanying Flood Risk Assessment (FRA) (Appendix 9-1) detail the flood risk of the Proposed Project. Based on the information provided in the stated documents, the areas of the Proposed Project at risk of flooding were identified.

No recurring or historic flood incidents are recorded within the Proposed Project site. However, several flood events have been recorded in the surrounding lands. There are 2 no. recurring flood events (Flood ID: 2627 and 2643) mapped along the Boor River downstream of the Proposed Project site. The flood events are located upstream of the confluence of the Boor River and the Brooks stream.

Recurring flood events in the vicinity of the Proposed Project site include a recurring flood event along the R346, approximately 500m south of the site (Flood ID: 2906) and approximately 1km west of the site at Derrica Beg (Flood ID: 2907). Here low-lying land and roads are noted to flood annually following heavy rain.

The National Catchment Flood Risk Management (CFRAM)⁴³ Programme has been completed along the Brosna River, approximately 2km south of the Proposed Project site. The modelled fluvial flood zones in this area extend a significant distance from the mapped river channel indicating the presence of a floodplain. However, the flooding does not encroach upon the site, with the exception of an existing BnM railway line which traverses the site. With regards to the Proposed Project infrastructure, the low probability fluvial flood zone associated with the 1 in 1,000-year flood event is situated approximately 1.6km from the nearest proposed turbine location (T03). Note that there are no NIFM fluvial flood zones mapped in the area of the TDR works at Kennedy's Cross.

³⁹ Nolan, P. 2015. EPA Report: Ensemble of Regional Climate Model Projections for Ireland. EPA climate change research report no. 159. EPA: Wexford.

⁴⁰ O'Sullivan, J., Sweeney, C., Nolan, P. and Gleeson, E., 2015. A high-resolution, multi-model analysis of Irish temperatures for the mid-21st century. *International Journal of Climatology*. doi: 10.1002/joc.4419.

⁴¹ <https://www.epa.ie/our-services/monitoring-assessment/climate-change/climate-ireland/impact-of-climate-change-on-ireland/climate-hazards/coastal-flooding>.

⁴² EPA (2005) *Climate Change Regional Climate Model Predictions for Ireland* <<https://www.epa.ie/publications/research/climate-change/climate-change-regional-climate-model-predictions-for-ireland.php>>

⁴³ CFRAM is Catchment Flood Risk Assessment and Management. The national CFRAM programme commenced in Ireland in 2011 and is managed by the OPW. The CFRAM Programme is central to the medium to long-term strategy for the reduction and management of flood risk in Ireland.

The National Indicative Fluvial Flood Mapping (NIFM) (www.floodinfo.ie) shows probabilistic fluvial flood zones for catchments greater than 5km² for which flood maps were not produced under the CFRAM Programme. For the Present-Day Scenario, the low (1,000-year flood event) and medium (100-year flood event) probability fluvial flood zones are recorded in the main bog area along the EPA-mapped Lemanaghan Stream. The flood zones extend some distance away from the mapped watercourse. This is likely due to the low-lying nature of some of the peat fields (historic peat extraction has lowered the topography of the local area). Site walkover surveys have revealed that the Lemanaghan Stream has been modified within the Proposed Project site and now forms part of the bog drainage infrastructure. The integration of the Lemanaghan Stream into the bog drainage system casts doubt on the validity of the NIFM mapped flood zones as the modelling assumes the presence of the natural, non-modified, Lemanaghan Stream in this area.

The CFRAM Programme has modelled flooding associated with potential 2 no. future climate change scenarios. The Mid-Range and High-End Future Scenario flood extents were generated using an increase in rainfall of 20% and 30% respectively. The extent of the CFRAM flood zones along the Brosna River increase slightly for each future scenario. However, the low probability flood zone associated with the High-End Future Scenario does not encroach upon the Site. Similarly, NIFM mapping has been modelled for the 2 no. potential future climate change scenarios. Both modelled flood extents show similar flood zones to the Present-Day Scenario discussed above.

No additional flood zones are mapped to encroach upon the site. However, NIFM flood zones are located on the Boor River, the Brooks Stream and the Blackwater River downstream of the Proposed Project site. Note that there are no NIFM fluvial flood zones mapped in the area of the TDR works at Kennedy's Cross.

The GSI Historical Groundwater flood map and the modelled groundwater flood extents map (www.floodinfo.ie) do not show the occurrence of any groundwater flooding within the Proposed Project site. The closest historic groundwater flood zone is mapped approximately 950m to the west of the site in the townland Lisdermot, Co. Offaly. There are no groundwater flood zones mapped in the area of the TDR works at Kennedy's Cross.

The FRA concludes that the overall risk of flooding posed at the site is low. Furthermore, the risk of the Proposed Project contributing to downstream flooding is also very low, as the long-term plan for the site is to retain and slow down drainage from the bogs, and this will result in sections of the site being wetter for longer and therefore promoting more Fen like conditions.

Robust drainage measures on the Proposed Wind Farm will include swales, silt traps, check dams, settlement ponds and buffered outfalls. Please refer to Section 4.9 of Chapter 4 and Section 9.4 and Section 9.5 of Chapter 9 of the EIAR for further details.

Wind and Storms

Future climate and weather predictions indicate a slight reduction in mid-century (2041 – 2060) average wind speeds around Ireland (-2.47% for RCP 8.5 high emissions scenario compared to the 1981 – 2000 baseline), with these decreases being more pronounced during the summer months⁴⁴. Predictions also point towards less frequent, but more intense storm activity around Ireland. However, there is uncertainty with regard to future predictions for storms, and it is expected that the trends observed in the frequency and intensity of storms will continue to be influenced by natural variability. Additionally, future trends are difficult to predict due to a low confidence in attributing historic trends in storms to climate change. However, ongoing changes in the climate may potentially affect storms with cumulative effects on wind.

⁴⁴ <https://www.climateireland.ie/impact-on-ireland/future-climate-of-ireland/windspeed/>

Projections indicate a decrease in average and extreme wave heights towards the end of the century, but an increase in the frequency and severity of storm surges in coastal regions of western Ireland, particularly in winter months⁴⁵. Storm surge levels over a 20-to-30-year return period are anticipated to increase by up to 9cm by 2100⁴⁶.

11.3.2.3 Greenhouse Gas Emissions Projections

In its approach to decarbonisation, the EU has split greenhouse gas emissions into two categories: Emissions Trading System (ETS) emissions and non-ETS emissions. Emissions from electricity generation and large industry in the ETS are subject to EU-wide targets which require that emissions from these sectors be reduced by 43% by 2030, relative to 2005 levels. Within the ETS, participants are required to purchase allowances for every tonne of emissions, with the amount of these allowances declining over time to ensure the required reduction of 43% in greenhouse gas emissions is achieved at EU-level⁴⁷.

Emissions from all other sectors, including agriculture, transport, buildings, and light industry are covered by the EU Effort Sharing Regulation (ESR)⁴⁸. This regulation established binding annual greenhouse gas emission targets for Member States for the period 2021–2030. Please see Section 11.2.1 above and Section 1.1.1.10 of Appendix 11-1 for further details on the EU ESR.

Considerable progress has been made in the decarbonisation of the Electricity Sector, with emissions falling 22% between 2022 and 2023. This reduction in emissions is due to an increase in the share of renewable electricity generation, from 38.6% to 40.7% from 2022 to 2023, with wind energy accounting for 33.7% of electricity supply.⁴⁹

The Environmental Protection Agency (EPA) publish Ireland’s greenhouse gas emission projections and at the time of writing, the most recent report, *‘Ireland’s Greenhouse Gas Emissions Projections 2024-2055’* was published in May 2025. The report includes an assessment of Ireland’s progress towards achieving its emission reduction targets out to 2030 set under the ESR.

The EPA has produced two scenarios in preparing these greenhouse gas emissions projections: a “With Existing Measures” (WEM) scenario and a “With Additional Measures” (WAM) scenario. These scenarios forecast Ireland’s greenhouse gas emissions in different ways. The WEM scenario assumes no additional policies and measures, beyond those already in place by the end of 2023. This is the cut off point for which the latest national greenhouse gas emission inventory data is available, known as the ‘base year’ for projections. The WAM scenario has a higher level of ambition and includes government policies and measures to reduce emissions such as those in Ireland’s Climate Action Plan 2024 that are not yet implemented. As implementation of policies and measures occurs, they will be migrated into the WEM Scenario. Please note, CAP25 is not specifically referenced in this report as it had yet to be published during the preparation phase of the 2024-2055 projections. A review was undertaken and there are no significant additional measures in CAP25 therefore no major omissions in these projections.

The EPA Emission Projections Update notes the following key trends:

⁴⁵ <https://www.epa.ie/publications/research/climate-change/research-339-high-resolution-climate-projections-for-ireland-.php>

⁴⁶ <https://www.climateireland.ie/impact-on-ireland/future-climate-of-ireland/waves-surges/>

⁴⁷ Department of the Environment, Climate and Communications (2023) - Climate Action Plan 2024
<https://www.gov.ie/en/publication/79659-climate-action-plan-2024/>

⁴⁸ Regulation (EU) 2018/842 of the European Parliament and of the Council of 30 May 2018 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement and amending Regulation (EU) No 525/2013 (Text with EEA relevance)

⁴⁹ Department of the Environment, Climate and Communications (2025) - Climate Action Plan 2025

- Ireland is not on track to meet the 51% emissions reduction target by 2030 (as compared to 2018 levels) based on most up to date EPA projections which include many of Climate Action Plan 2024 measures
- The first two carbon budgets (2021-2030), which aim to support achievement of the 51% emissions reduction goal, are projected to be exceeded by a significant margin
 - Carbon Budget 1 to be exceeded by a margin of 8 to 12 MtCO_{2e}
 - Carbon Budget 2 to be exceeded by a margin of 77 to 114 MtCO_{2e} (with carryover from Carbon Budget 1)
- Sectoral emissions ceilings for 2025 and 2030 are projected to be exceeded by the Buildings, Electricity, Industry and Transport Sectors and met by the Other sector
 - Please note, a direct comparison of emissions in the Agriculture sector against its Sectoral Emission Ceiling is no longer viable due to significant refinement of the Agriculture inventory
- From 21.4 MtCO_{2e} in 2018, total emissions from the Agriculture sector are projected to be between 18.0 and 21.6 MtCO_{2e} in 2030 (a 16% reduction in WAM and 1% increase in WEM)
 - Without full implementation of all planned policies and measures, there will be a net increase in emissions in this sector by 2030.
- Transport emissions are projected to decrease from 12.3 MtCO_{2e} in 2018 to between 9.7 MtCO_{2e} and 11.2 MtCO_{2e} in 2030 (a 9 to 21% reduction).
- From 10.6 MtCO_{2e} in 2018, emissions from the Energy Industries sector are projected to decrease to between 3.4 and 4.4 MtCO_{2e} in 2030 (a 59 to 68% reduction)
 - Renewable energy generation at the end of the decade is projected to range from 69 to 68% of electricity generation
- Emissions from the Energy Industries sector are projected to decrease by between 57 and 62% over the period 2022 to 2030
 - Renewable energy generation at the end of the decade is projected to range from 69 to 80% of electricity generation
- Total emissions from the LULUCF sector are projected to increase over the period 2018 to 2030 by between 1.5 and 3.8 MtCO_{2e} (an increase of 39 to 95%)
- Ireland is not projected to meet its EU target, set under the Effort Sharing Regulation, of a 42% emissions reduction by 2030 (compared to 2005) even with flexibilities applied
 - Under the WEM Scenario Ireland is projected to receive a 9.5% emission reduction from 2005 levels by 2030
 - Under the WAM Scenario Ireland is projected to achieve a 21.7% emissions reduction from 2005 levels by 2030.

11.3.3 Summary

As outlined in the preceding sections, Ireland is and will continue to experience climate change in line with global trends, with current projections indicating that these effects will intensify in the coming decades. The design of the Proposed Project has considered the potential climate change effects under both the baseline and future environment, and it is considered that the Proposed Project will not be negatively impacted by climate change, nor will it have a negative impact on climate change over its 35-year design horizon.

Further information on the vulnerability of the Proposed Project to major accidents and natural disasters is detailed in Section 16.4 of Chapter 16 Major Accidents and Natural Disasters.

11.4 Carbon Assessment - Calculating Carbon Losses and Savings from the Proposed Project

11.4.1 Background

In addition to the combustion of fossil fuels, greenhouse gases are also released through natural processes such as the decomposition of organic (i.e., carbon-based) material. Bogs and peatlands are known to store large amounts of organic carbon. Due to the waterlogged nature of these habitats, stored carbon is not broken down and released into the atmosphere. The construction of wind farms on bog and peat habitats may affect the natural hydrological regime, thus exposing and drying out the peat and allowing the decomposition of carbon. It is therefore necessary to demonstrate that any wind farm constructed on such sites saves more carbon than is released. The Proposed Wind Farm is situated on a mixture of bare cutaway peat, re-vegetated bare peat, degraded raised bog, scrub, and remnants of high bog. Please note that the Proposed Wind Farm has been subject to industrial peat extraction and drainage over several decades and consequently, the peatland habitats and hydrology are highly degraded and modified from their original state. As such, the peatland habitat loss would not be as significant as that of an intact peatland. The Proposed Grid Connection is situated on agricultural land and peatland. For this reason, the carbon balance between the use of renewable energy and the loss of the carbon stored in the peat will be assessed in this section of the EIAR.

Please note that in line with the Department of Agriculture, Food, and the Marine, Forest Service's published policy⁵⁰ on granting felling licences for wind farm developments, areas cleared of forestry for access roads, and any other wind farm-related uses will have to be replaced by replanting at an alternative site or sites. The Forest Service policy requires replacement or replanting on a hectare-for-hectare basis for the footprint of the infrastructure developments. The estimated 3.8 hectares of immature woodland (WS2) that will be felled within and around the Proposed Wind Farm along with existing treeline boundaries is not subject to a LFL (Limited Felling License) from the Forestry Service and will be replanted within the site as detailed in Section 6.4.2 of Chapter 6 Biodiversity and Appendix 6-5 BMEP. Therefore, the losses associated with tree felling are not included in the carbon loss assessment provided in Section 11.4.3.1.

CO₂ emissions occur naturally in addition to being released with the burning of fossil fuels. All organic material is composed of carbon, which is released as CO₂ when the material decomposes. Peatland habitats have a significant capacity to store organic carbon. The vegetation on a peat bog slowly absorbs CO₂ from the atmosphere when it is alive and converts it to organic carbon. When the vegetation dies, in the acidic waterlogged conditions of bogs and peatlands, the organic material does not decompose fully, and the organic carbon is retained in the ground.

The carbon balance of wind farm developments in peatland habitats has attracted significant attention in recent years. When developments such as wind farms are proposed for peatland areas, there will be direct impacts and loss of peat in the area of the development footprint. There may also be indirect impacts where it is necessary to install drainage in certain areas to facilitate construction, or from the reinstatement of extracted peat. The works can either directly or indirectly allow the peat to dry out, locally, which permits the full decomposition of the stored organic material with the associated release of the stored carbon as CO₂. It is therefore important to demonstrate that a wind farm development in a peatland area offsets more CO₂ through its operational lifetime than is released during construction, operation and decommissioning.

The below assessment includes all projected carbon losses associated with turbine infrastructure lifecycle (manufacture, construction, decommissioning) of the Proposed Project, back up of proposed

⁵⁰Department of Agriculture, Food and the Marine (2020). Forest Service <<https://www.gov.ie/en/department-of-agriculture-food-and-the-marine/publications/tree-felling-licences/>>

turbines, reduced carbon fixing potential of the Site, soil organic matter, tree felling activities, traffic generation, embodied carbon of all construction materials, and those emissions associated with carbon savings from the Proposed Project.

11.4.2 Methodology for Calculating Losses

A methodology for calculating carbon losses was published in June 2008 by scientists at the University of Aberdeen and the Macauley Institute with support from the Rural and Environment Research and Analysis Directorate of the Scottish Government, Science Policy and Co-ordination Division. The document, ‘*Calculating Carbon Savings from Wind Farms on Scottish Peat Lands*’, was developed to calculate the impact of wind farm developments on the soil carbon stocks held in peat. This methodology was refined and updated in 2011 based on feedback from users of the initial methodology and further research in the area. The web-based version of the carbon calculator, which supersedes the Excel-based versions of the tool, was released in 2016. Please note that the web-based version of the carbon calculator is currently not available. The Macauley Institute has supplied a worksheet of the calculator (Version 2.15.0) which has been used to complete the following carbon loss assessment. The tool provides a transparent and easy to follow method for estimating the impacts of wind farms on the carbon dynamics of peatlands. Previously, guidance produced by Scottish Natural Heritage in 2003 had been widely employed to determine carbon payback in the absence of more detailed methods.

Further to the methodology supplied by the Macauley Institute, other relevant data sources utilised for the calculation of carbon losses to provide relevant information in an Irish context. These additional information sources are listed below:

- Multiyear greenhouse gas balances at a rewetted temperate peatland. (Wilson et al., 2016a);
- Greenhouse gas Emission Factors. (Wilson et al., 2016b);
- Derivation of GHG emission factors for peatlands managed for extraction in the ROI and the UK. (Wilson et al., 2015); and
- The Effect of Management Strategies on Greenhouse Gas Balances in Industrial Cutaway Peatlands in Ireland (The CARBAL Report) (Wilson, D. and Farrell, E.P., 2007); and
- Wilson et al (2013) Carbon Emissions and Removals from Irish Peatlands: Present Trends and Future Mitigation Measures, Irish Geography 2013 Vol. 46 Nos. 1-2, 1-23 (Wilson et al., 2013).

These data sources were used to assess the effects of the Proposed Project in terms of potential carbon losses taking into account peat removal, drainage and operation of the Proposed Wind Farm.

Although the loss of carbon fixing potential from plants on peatland is not substantial, it is nonetheless calculated for areas from which peat is removed and the areas affected by drainage. The development of a wind farm requires the construction of infrastructure, i.e., turbines and associated foundations and hardstands, internal site roads, construction compounds, etc. and, on a site such as the Proposed Project, this requires peat excavation resulting in the loss of the carbon-fixing potential associated with that peat. The determination of the carbon losses associated with the carbon-fixing potential of peat is calculated from the area affected by proposed infrastructure of a wind farm development (both directly by removal of peat and indirectly by drainage, the annual gains due to the carbon fixing potential of the peatland, and the time required for habitat restoration). The amount of carbon lost is estimated by the Macauley Institute carbon tool using default values from the IPCC Revised 1996 Guidelines for National Greenhouse Gas Inventories⁵¹ as well as by more site-specific equations derived from the

⁵¹ IPCC (1997) Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories

scientific literature and updated emission factors.⁵² Please note, carbon losses associated with the removal of other carbon-fixing vegetation will result in additional carbon losses. These have not been quantified as the lack of consistent national-level field data and methodologies limits the ability to make accurate projections on carbon sequestration potential for other carbon fixing habitat types, i.e., hedgerow, grassland, etc., and therefore carbon loss associated with removal. While it can be assumed that loss of carbon fixing vegetation will occur as part of the Proposed Project due to the removal of these habitat types, the exact carbon loss is not quantifiable. It is also assumed that these carbon losses are not significant as the vast majority of the site consists of bare peat and therefore vegetation coverage is limited. However, to ensure a robust assessment in Section 11.5 below, these carbon losses have been considered; please see Section 11.5.2 and 11.5.3 below for the detailed impact assessment and Appendix 11-2 for further information on assumptions used in this assessment.

Peatlands are essentially unbalanced systems. When flooded, peat soils emit less carbon dioxide but more methane than when drained. In waterlogged soils, CO₂ emissions are usually exceeded by plant fixation, so the net exchange of carbon with the atmosphere is negative and soil carbon stocks increase. When soils are aerated, CO₂ emissions usually exceed plant fixation, so the net exchange of carbon with the atmosphere is positive. In order to calculate the CO₂ emissions resulting from the removal or drainage of the peat, the Macauley Institute method accounts for emissions occurring if the peat had been left in-situ and subtracts these from the emissions occurring after removal and drainage.

The Macauley Institute methodology states that the total volume of peat impacted by the construction of a wind farm is strongly correlated to the extent of the peatland affected by drainage at the site.

The drainage of peat soils leads to continual loss of soil carbon until a new steady state is reached, when inputs are approximately equal to losses. For peats, this steady state approximates 0% carbon, so 100% carbon loss from drained peats is assumed if the site is not restored after decommissioning of the wind farm. The amount of carbon lost is calculated on the basis of the annual emissions of methane and carbon dioxide, the area of drained peat, and the time until the site is restored. In the case of the Proposed Project, the model has been prepared on the basis that restoration will not occur upon decommissioning of the wind farm (i.e., site roads, hardstands, construction compounds, will be left in situ). However, as detailed in Section 4.11, upon decommissioning, it is proposed that all above ground turbine and met mast components will be removed, and hardstands and compounds would remain underground and covered with peat and allowed to revegetate. The Decommissioning Plan, included as Appendix 4-8, will be updated prior to the end of the operational period in line with decommissioning methodologies that may exist at the time and will agree with the competent authority at that time.

The effects of drainage may also reduce dissolved and particulate organic carbon retention within the peat. Losses of carbon dioxide due to leaching of dissolved and particulate organic carbon are calculated as a proportion of the gaseous losses of carbon from the peat. The Macauley Institute method assumes that published good practice is employed in relation to avoiding the risk of peat landslides. This is certainly the case in respect of the Proposed Project, which has been the subject of a peat stability risk assessment, as described in the Peat Stability Assessment Report in Appendix 8-1 of this EIAR.

The outputs of the Macauley Institute carbon calculator are included in Appendix 11-2 of this EIAR, 'Carbon Calculations'.

In addition to the Macauley Institute methodology described above, where possible, CO₂ emissions or losses associated with embodied carbon of materials used in the construction, operational and decommissioning phase of the Proposed Project have been identified. Embodied carbon refers to the emissions associated with procuring, mining and harvesting raw materials, the transformation of those

⁵² *Calculating potential carbon losses and savings from wind farms on Scottish peatlands (2018)* <<https://www.gov.scot/advice-and-guidance/2018/12/carbon-calculator-technical-guidance/documents/calculating-potential-carbon-losses-and-savings-from-wind-farms-on-scottish-peatlands>>

materials into construction products, transporting them to site, installation of these materials during a construction phase, and the subsequent replacement, removal, and disposal of these materials upon decommissioning⁵³.

The full life cycle and embodied carbon of the proposed turbines have been taken account of in the Macauley Institute model. The emissions associated with the embodied carbon, along with the construction phase transport movements, of the remaining features of the site are considered using the TII Carbon Tool (TII, 2022)⁵⁴. The TII Carbon Tool is customised for road and light rail projects in Ireland, using emission factors from recognised sources during the construction, maintenance and operation of TII projects in Ireland.

Section 15.1.6 in Chapter 15 of this EIAR outlines traffic generation numbers relative to quantum of materials required for the construction of the Proposed Project, the details of which have been utilised to determine the emissions associated with these activities and are included in Appendix 11-2.

11.4.3 Carbon Losses and Savings Calculations

11.4.3.1 Carbon Losses

The Scottish Government online carbon calculator⁵⁵ was used to assess the impacts of the Proposed Project in terms of potential carbon losses taking into account peat removal and reinstatement, drainage, habitat improvement, forestry felling and site restoration. The online calculator is pre-loaded with information specific to the CO₂ emissions from the United Kingdom's electricity generation plant, which is used to calculate emissions savings from proposed wind farm projects in the UK. However, due to the availability of Irish-specific carbon intensity emission factors for the Irish electricity generation plant, available from the SEAI website⁵⁶, the CO₂ emissions savings from the Proposed Project have been calculated separately from the online carbon calculator as set out in Section 11.4.3.2 below.

In relation to embodied carbon and associated transport movements of all other ancillary elements of the Proposed Project, the TII Carbon Tool has been utilised to assess the impacts of the Proposed Project in terms of potential carbon losses in relation to construction phase transport emissions and embodied carbon.

A copy of the outputs is provided as Appendix 11-2 of this EIAR, 'Carbon Calculations'. Where available and relevant, site-specific information was inserted into the online carbon calculators. Otherwise, default values were used.

The main CO₂ losses due to the Proposed Project are summarised in Table 11-5.

⁵³ Irish green Building Council – What is embodied carbon? <<https://www.igbc.ie/what-is-embodied-carbon/>>

⁵⁴ Transport Infrastructure Ireland Carbon Tool for Road and Light Rail Projects: User Guidance Document
<https://www.tii.ie/publications/library/GE-ENV-01106-01.pdf>

⁵⁵ Scottish Government online Carbon Calculator. Available at: <https://www.gov.scot/publications/carbon-calculator-for-wind-farms-on-scottish-peatlands-factsheet/>

⁵⁶ <https://www.seai.ie/data-and-insights/seai-statistics/conversion-factors>

Table 11-5 CO₂ Losses from the Proposed Project

| Origin of Losses | CO ₂ Losses (tonnes CO ₂ equivalent) | |
|------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|----------------|
| | Expected | Maximum |
| Losses due to turbine life (e.g., manufacture, construction, decommissioning) | 77,078 | 78,480 |
| Losses due to backup | 60,293 | 61,298 |
| Losses from reduced carbon fixing potential | 1,985 | 2,646 |
| Losses from soil organic matter and due to leaching of dissolved and particulate organic carbon (CO ₂ loss from removed and drained peat) | 37,622 | 173,231 |
| Losses associated with embodied carbon in construction materials | 82,933 | 82,933 |
| Losses associated with traffic and transport movements | 1,450 | 1,450 |
| Total | 261,360 | 400,038 |

The worksheet models and online tools calculate that the Proposed Project will give rise to 261,360 tonnes of CO₂ equivalent losses over its 35-year life. Of this total figure, the Proposed Wind Farm’s turbines directly account for 77,078 tonnes, or 29%. Losses due to backup account for 60,293 tonnes, or 23%. Losses from reduced carbon fixing potential accounts for 1,985 tonnes, or 0.8%. Losses from soil organic matter, i.e., CO₂ loss from removed and drained peat, will equate to 37,622 tonnes, or 14%. Losses due to embodied carbon accounts for 82,933 tonnes, or 32% and losses due to construction phase transport emissions accounts for 1,450 tonnes, or 0.5%.

The figure of 37,622 tonnes of CO₂ arising from ground activities associated with the Proposed Project is calculated based on the entire Proposed Project footprint being “Acid Bog”, as this is one of only two choices the model allows (the other being Fen). The Carbon Calculator Technical Guidance document⁵⁷ defines ‘Acid Bog’ as being ‘a wetland fed primarily by rainwater and often inhabited by sphagnum moss, thus making it acidic’ and ‘Fen’ as being ‘a type of wetland fed by surface and/or groundwater (McBride et al., 2011)’. The habitat that will be impacted by the Proposed Project footprint comprises predominantly cutover peatland which has been subject to industrial peat extraction and drainage over several decades. Consequently, the peatland habitats and hydrology are highly degraded and modified from their original state. Therefore, to the degraded nature of the peatlands which comprise the Proposed Project site, it is therefore assumed that the actual carbon losses associated with ground activities will be less than the 37,622 tonnes stated in Table 11-5 above, which was calculated under a precautionary scenario of “Acid Bog”.

The values discussed above are based on the assumption that no habitat enhancement activities will take place as part of the Proposed Project. Please note that as part of Condition 10 attached to Bord na Móna’s IPC licence (Ref. P0500-01), decommissioning and habitat rehabilitation work is currently being carried out on the site; all measures associated with Condition 10 of the IPC Licence are separate from proposed enhancement identified for the Proposed Project and will take place on the site regardless of the planning permission for the Proposed Project. Appendix 6-5 to Chapter 6 provides a Biodiversity Management and Enhancement Plan for the Proposed Project. Proposed measures include the creation

⁵⁷ Scottish Government (2018) Carbon Calculator: Technical Guidance <<https://www.gov.scot/publications/carbon-calculator-technical-guidance/>>

of localised wetland areas for bird populations and habitat management for marsh fritillary. Taking into account the habitat enhancement that will take place for the Proposed Project, the actual CO₂ losses for reduced carbon fixing potential of the peatland on which the Proposed Project is situated is expected to be lower than the values detailed in Table 11-5, over the lifetime of the Proposed Project.

The figure of 82,933 tonnes of CO₂ arising from the embodied carbon of construction materials associated with the Proposed Project is calculated based the types of materials available in the TII Carbon Tool such as, concrete, steel, cement and granular fill, and assumes that each Heavy Goods Vehicles (HGV) or Large Good Vehicles (LGV) will be carrying material at its full capacity. The figure of 401 tonnes of CO₂ arising from transport movements associated with construction activities of the Proposed Project is calculated based on the assumption that material will be imported locally or from a port/city location where applicable. Details on the assumptions made for the modelling of embodied carbon and construction phase transport emissions are included in Appendix 11-2.

The above calculation is based on the assumption that the hydrology of the Proposed Project and habitats within the site are not restored on decommissioning of the Proposed Wind Farm after its expected 35-year proposed operational life. As detailed in the Decommissioning Plan, Appendix 4-8, it is proposed that the wind turbines will be dismantled and removed offsite. It is not intended to remove the concrete foundations from the ground as it is considered that their removal will be the least preferred option in terms of potential effects on the environment. The associated foundations will be backfilled and covered with peat. Peat will be spread and graded over the foundation using a tracked excavator and revegetation enhanced by spreading of an appropriate seed mix to assist in revegetation and accelerate the resumption of the natural drainage management that will have existed prior to any construction. The underground electrical cabling connecting the turbines to the proposed onsite 220kV substation will be removed from the cable ducts. The cable ducting will be left in-situ as it is considered the most environmentally prudent option, avoiding unnecessary excavation and soil disturbance. The cable materials will be transferred to a suitable recycling or recovery facility. Taking into account the proposals incorporated in the Decommissioning Plan, the actual CO₂ losses are expected to be lower than the values detailed in Table 11-5.

11.4.3.1.1 Carbon Sequestration Potential

During the construction and operation phase, the lands beneath the Proposed Project footprint will not be available to develop into carbon sequestering habitat. In addition, lands adjacent to the Proposed Wind Farm footprint may also be indirectly impacted through drainage and therefore also not reach their carbon sequestration potential. As stated in Section 1.1.1 of Chapter 1 of the EIAR, the site encompasses an area of approximately 1,258 hectares (ha). The permanent infrastructure footprint of the Proposed Project measures approximately 34.3ha, which represents approximately 3% of the site. In order to assess the potential that the Proposed Project might have on the carbon balance of the lands over the lifetime of the project, a number of conservative assumptions are made:

- 100% of the area beneath the wind farm footprint will actively sequester carbon continuously over the 35-year period and will begin to sequester carbon in 2025.
- The highest recorded rate of carbon sequestration for rewetted cutaway peatlands is utilised in the calculation⁵⁸.
- A total of 50% of the area outside of the Proposed Project footprint will actively sequester carbon at the stated rate and the remainder will be carbon-neutral.
- The Proposed Project footprint is buffered by 5m around the permanent infrastructure to allow for any possible impact on habitat formation in those areas adjacent to the footprint.

⁵⁸ EPA (2018). Network Monitoring Rewetted and Restored Peatlands/organic Soils for Climate and Biodiversity Benefits (NEROS), EPA Research Programme 2014-2020, P23, Table 5.2.

It should be noted that the draft Cutaway Bog and Decommissioning Plan (Draft Rehabilitation Plan) for Lemanaghan Bog (Appendix 2-4) recognise that the surface topography within the site is heterogeneous. Therefore, it is not possible to re-wet all areas within the site and hence create the optimum conditions for carbon sequestration. In the drier areas, this will result in the formation of dry woodland areas or similar drier habitats. Furthermore, in those areas where the optimum conditions for carbon sequestration will be created by the rehabilitation plan it will require time to transition to the desired habitat. This applies to both the areas within and outside the Proposed Project footprint. Finally, the application of a 5m buffer around the windfarm infrastructure is a conservative assumption. Research has indicated that the impact of drains on the water table adjacent to the drain may extend only a few metres.^{59,60} Habitat regeneration and rehabilitation can be directly applied adjacent to the Proposed Project infrastructure.

The permanent infrastructure footprint of the Proposed Project will be approximately 3% of site and therefore does not impact or change the overall goals and outcomes of the proposed rehabilitation plans for Lemanaghan Bog. As such, it is the intention of the BnM to integrate the peatland rehabilitation measures with the Proposed Project. The key objectives of environmental stabilisation and re-wetting of the cutaway areas will occur between and surrounding the Proposed Wind Farm infrastructure. For example, during construction for access tracks, hardstands and other areas, peat is excavated from the cutaway, moved to the side, graded into berms not more than 1m and allowed to naturally re-vegetate. This has proven successful during the construction of the Derrinlough, Mountlucas, and Cloncreen Wind Farms, see Plate 11-1 below. The projected impact under theoretical precautionary conditions is outlined in Table 11-6.

Table 11-6 Assessment of potential loss of carbon sequestration due to the Proposed Project

| Description | Windfarm | Windfarm plus 5m Buffer (Note 1) |
|------------------------------------------------------------------|--------------------|----------------------------------|
| Total Footprint (Ha) | 34.4 | 74.3 |
| Carbon sequestration factor (tCO ₂ /ha/yr) | 3.82 ⁶¹ | 3.82 ⁶² |
| Rewetted Footprint carbon savings (tCO ₂ /ha/35yr) | 4,599 | 9,934 |
| Area of the site (Ha) | 1,258 | 1,258 |
| Area of the site assume to actively sequester carbon (Ha) | 629 | 629 |
| Proposed Wind Farm carbon savings total (tCO ₂ /35yr) | 56,375* | 56,375* |
| % loss of carbon sequestration (30yr) | 8.2% | 17.6% |

Note 1: 5m is considered to be a worst-case buffer.

*Carbon saving calculations are presented in Section 11.4.3.2 below

In conclusion, on the basis of a number of conservative assumptions the percentage loss of carbon sequestration arising from the construction of the Proposed Project is determined to range from 8.2% - 17.6%.

⁵⁹ Stewart and Lance (1991) *Effects of Moor-Draining on the Hydrology and Vegetation of Northern Pennine Blanket Bog*. *Journal of Applied Ecology*, Dec. 1991, Vol. 28, No. 3 pp. 1105-1117. <https://www.jstor.org/stable/2404228>

⁶⁰ Galvin, L. F 1976 *Physical Properties of Irish Peats*. *Irish Journal of Agricultural Research*, Vol. 15, No. 2 (Aug. 1976), pp. 207-221. <http://www.jstor.org/stable/25555820>

⁶¹ EPA (2018). *Network Monitoring Rewetted and Restored Peatlands/organic Soils for Climate and Biodiversity Benefits (NEROS)*, EPA Research Programme 2014-2020, P23, Table 5.2.

⁶² *ibid*.

Plate 11-1 Peatland rehabilitation implemented in the form of drain blocking proximal to wind farm infrastructure at Cloncreen Wind Farm.



11.4.3.2 Carbon Savings

According to the model described above, the Proposed Project will give rise to total losses of 261,360 tonnes of carbon dioxide.

A simple formula can be used to calculate carbon dioxide emissions reductions resulting from the generation of electricity from wind power rather than from carbon-based fuels such as peat, coal, gas and oil. The formula is:

$$\text{CO}_2 \text{ (in tonnes)} = \frac{\text{A} \times \text{B} \times \text{C} \times \text{D}}{1000}$$

where: A = The rated capacity of the wind energy development in MW

B = The capacity or load factor, which takes into account the intermittent nature of the wind, the availability of wind turbines and array losses etc.

C = The number of hours in a year

D = Carbon load in grams per kWh (kilowatt hour) of electricity generated and distributed via the national grid.

For the purposes of this calculation, the rated capacity of the Proposed Wind Farm is assumed to be 90MW (based on 15 No. 6 MW turbines).

A load factor of 0.35 (or 35%) has been used for the Proposed Project.⁶³

The number of hours in a year is 8,760.

A conservative figure for the carbon load of electricity generated by natural gas in Ireland was sourced from Sustainable Energy Authority Ireland's (SEAI) Conversion and Emissions Factors for Publication worksheet.⁶⁴ The emission factor for electricity generated in Ireland in 2024 was 204.3gCO₂/kWh.⁶⁵

The calculation for carbon savings is therefore as follows:

$$\begin{aligned} \text{CO}_2 \text{ (in tonnes)} &= \frac{(90 \times 0.35 \times 8,760 \times 204.3)}{1000} \\ &= 56,375 \text{ tonnes per annum} \end{aligned}$$

Based on this calculation, **56,375** tonnes of carbon dioxide will be displaced per annum from the largely carbon-based traditional energy mix by the Proposed Wind Farm. Over the proposed 35-year lifetime of the development, therefore **1,973,125** tonnes of carbon dioxide will be displaced from traditional carbon-based electricity generation.

Based on the Scottish Government carbon calculator as presented above in Section 11.4.3.1, 261,360 tonnes of CO₂ will be lost to the atmosphere due to changes in the soil and ground conditions and due to the construction and operation of the Proposed Project. This represents **13%** of the total amount of carbon dioxide emissions that will be offset by the Proposed Wind Farm. The 261,360 tonnes of CO₂ that will be lost to the atmosphere due to changes in soil and ground conditions and due to the construction and operation of the Proposed Project will be offset by the Proposed Wind Farm in approximately **56** months (4.6 years) of operation.

As detailed in Section 11.4.3.1 above, habitat enhancement will take place as part of the Proposed Project, in addition to the restoration requirements required as part Condition 10 of the relevant IPC licence (Ref. P0500-01). These activities, over the lifetime of the Proposed Project has the potential to give rise to carbon savings; please note, this potential has not been quantified and therefore is not considered in Section 11.5.3 below. The carbon storage capacity of restored habitats will vary over time as vegetation matures / reverts and land use and the baseline environment change. Therefore, while it can be assumed that rehabilitation measures on the site will result in an increased capacity of carbon storage due to the carbon storage potential that exists within these habitats⁶⁶, to ensure the assessment below is identified under a theoretical precautionary scenario, the quantification of these potential carbon savings (via an increase in carbon storage potential) associated with these measures has not been included. Please note, the carbon sequestration potential associated with the replanting of native woodland will be able to be determined in the future via the Teagasc Forest Carbon Tool⁶⁷; currently this is not able to be completed due to Teagasc carrying out further analysis and validation on current data and the sequestration potential not being available in the public domain.

⁶³ Enduring Connection Policy 2.3 Solar and Wind Constraints Report: Assumptions and Methodology Available at: <https://cms.eirgrid.ie/sites/default/files/publications/ECP-2.3-Solar-and-Wind-Constraints-Report-Assumptions-and-Methodology-v1.1.pdf> The Proposed Project is located within the J wind region for Ireland with an associated of 35%.

⁶⁴ Conversion and Emission Factors for Publication (2024) <https://www.seai.ie/sites/default/files/data-and-insights/seai-statistics/conversion-factors/SEAI-conversion-and-emission-factors.xlsx>

⁶⁵ SEAI have published the provisional 2023 emission factor for electricity generation in Ireland as 229.9 gCO₂/kWh. Please note that this is a provisional value that may change.

⁶⁶ <https://teagasc.ie/news-events/daily/carbon-stocks-and-sequestration-in-hedgerows/>

⁶⁷ <https://interactive.teagasc.ie/Open/ForestryCarbon/ForestryCarbonCalculator>

11.5 Likely Significant Effects and Associated Mitigation Measures

11.5.1 'Do-Nothing' Scenario

If the Proposed Project were not to proceed, the site would continue to be managed under the requirements of the IPC licence (P0500-01) and therefore the ongoing decommissioning activities, site management and environmental monitoring would continue.

In the absence of the Proposed Project, natural revegetation processes would continue across the site. Areas of bare peat would progressively revegetate and transition through successional stages, potentially developing into heath communities, scrub or bog woodland over time, depending on local hydrological conditions. Therefore, the existing baseline of the landscape will transition from a predominantly industrial cutover peatland landscape, with open exposed peat surfaces and drainage features, to a more natural mosaic landscape of cutaway peatland, wetland and regenerating bog habitats.

The Proposed Project site is located on lands that are subject to ongoing and future peatland rehabilitation and decommissioning works required under the existing IPC Licence. Therefore, under a 'Do-Nothing' scenario, the implementation of the Draft Rehabilitation Plan as required under IPC License would continue. These rehabilitation works are mandatory and will proceed irrespective of whether the Proposed Project is permitted, in order to ensure compliance with the IPC Licence.

If the Proposed Project were not to proceed, the opportunity to further significantly reduce emissions of greenhouse gases, including carbon dioxide (CO₂), oxides of nitrogen (NO_x), and sulphur dioxide (SO₂) from fossil fuels to the atmosphere would be lost. The opportunity to capture a significant part of County Offaly's and Ireland's valuable renewable energy resources would be lost, as would the opportunity to contribute to meeting Government and EU Targets for the production and consumption of electricity from renewable resources and the reduction of greenhouse gas emissions. The opportunity to generate local employment and investment and to diversify the local economy would also be lost. This would be a long-term slight negative effect and is Not Significant.

11.5.2 Construction Phase

11.5.2.1 Greenhouse Gas Emissions

Proposed Wind Farm

The construction of Proposed Wind Farm infrastructure, including turbines and associated foundations and hard-standing areas, meteorological mast, access roads, temporary construction compounds, underground cabling, peat deposition areas, borrow pits, site drainage, biodiversity enhancement, amenity, and all ancillary works and apparatus will require construction materials (such as cement), and the operation of construction vehicles and plant on and off-site, and the transport of workers to and from the Proposed Wind Farm. Greenhouse gas emissions, e.g., carbon dioxide (CO₂), carbon monoxide and nitrogen oxides, associated with the production of construction materials, and operation of vehicles and plant will arise as a result of the construction activities. This effect will be short-term, negative and slight only, and is not significant, given the quantity of greenhouse gases that will be emitted to the atmosphere and will be restricted to the duration of the construction phase. Mitigation measures to reduce this impact are presented below.

Some potential long-term slight negative effects will occur due to the removal of carbon fixing vegetation and habitat, however, that has been avoided where possible by the design and layout of the Proposed Wind Farm. As identified in Section 11.4.3.1.1 the percentage loss of carbon sequestration

potential within the site arising from the construction of the Proposed Project is determined to range from 8.2% - 17.6%. This effect will be long-term, negative and slight only and is Not Significant.

Proposed Grid Connection

The construction of the proposed onsite 220kV substation and overhead line to connect to the existing Shannonbridge-Maynooth 220kV OHL, and all ancillary works and apparatus will require the operation of construction vehicles and plant on and off site, and the transport of workers to and from the Proposed Grid Connection.

Greenhouse gas associated with vehicles and plant, such as carbon dioxide (CO₂), carbon monoxide, and nitrogen oxides will arise as a result of construction activities. This effect will be short-term, negative and slight only, and is not significant, given the quantity of greenhouse gases that will be emitted to the atmosphere and will be restricted to the duration of the construction phase. Mitigation measures to reduce this impact are presented below.

Transport to and from the Proposed Project site

The transport of turbines and construction materials to the Proposed Project site, which will occur on specified routes only (see Section 4.7.3 in Chapter 4 of this EIAR), will also give rise to greenhouse gas emissions associated with the transport vehicles and exhaust emissions. This impact will be short-term, negative and slight only, and is not significant, given the quantity of greenhouse gases that will be emitted and will be restricted to the duration of the construction phase, therefore it is Not Significant. Mitigation measures to reduce this effect are presented below.

Waste Disposal

Construction waste will arise from the Proposed Project, mainly from excavation and unavoidable construction waste including material surpluses, damaged materials and packaging waste. This potential impact will be short-term, negative and slight only, and is not significant, given the quantity of greenhouse gases associated with the generation and management of these waste streams that will be emitted to the atmosphere and will be restricted to the duration of the construction phase, therefore it is not significant. Waste management will be carried out in accordance with *Best Practice Guidelines on the Preparation of Resource and Waste Management Plans for Construction & Demolition Projects* (2021) produced by the EPA.

Please refer to Section 4.5.7 of Chapter 4 of this EIAR and Section 3.8 of the Construction and Environmental Management Plan (CEMP) (Appendix 4-4) for detailed processes on waste management during the construction phase of the Proposed Project.

Mitigation

- Construction staff will be trained how to inspect and maintain construction vehicles and plant to ensure good operational order while onsite, thereby minimising any emissions that arise. The Site Supervisor/Construction Manager produce and follow a site inspection and machinery checklist which will be followed and updated if/when required.
- All construction vehicles and plant will be maintained in good operational order while onsite, thereby minimising any emissions that arise.
- When stationary, delivery and on-site vehicles will be required to turn off engines.
- Turbines and construction materials will be transported to the site on specified routes only unless otherwise agreed with the Planning Authority. Please see Section 15.1.6 of Chapter 15 Material Assets for details.

- It is intended to obtain the majority of materials for the construction of the Proposed Project from the proposed onsite borrow pits, with some material being imported from local licenced quarries as needed. This will significantly reduce the number of delivery vehicles accessing the site, thereby reducing the emissions associated with vehicle movements.
- A CEMP (Appendix 4-4) will be in place throughout the construction phase.
- The CEMP (Appendix 4-4) includes a Resource Waste Management Plan (RWMP) which outlines the best practice procedures that will occur during the construction phase relating to waste material.
 - The RWMP outlines the methods of waste prevention and minimisation by recycling, recovery and reuse at each stage of construction of the Proposed Project. Disposal of waste will be seen as a last resort.
 - Section 4.5.7 of Chapter 4 for this EIAR refers to the methodology that will be utilised to manage onsite waste. This waste material will be transferred to a licensed /permitted Materials Recovery Facility (MRF) by a fully licensed waste contractor.
 - The MRF facility will be local to the Proposed Project site to reduce the amount of emissions associated with vehicle movements. Derryclure Civic Amenity Site is the closest MRF to the Proposed Project and is approximately 19.4km southeast of the proposed turbine (T14).
- Where applicable, low carbon intensive construction materials will be sourced and utilised onsite.

Residual Effects

Following implementation of the mitigation measures above, residual effects of greenhouse gas emissions arising from the construction phase of the Proposed Project will have a short-term, imperceptible negative effect, which is not significant. However, once emitted to the atmosphere, the greenhouse gas emissions that will arise from construction phase activities will have a permanent imperceptible negative effect on climate, which is not significant.

When considering these greenhouse gas emissions within the context of the national Electricity Sector Emissions Ceilings detailed in Section 11.2.2, Carbon Budget 1 (2021-2025) has an Electricity Sector budget of 40 MtCO_{2e} and Carbon Budget 2 (2026-2030) has an Electricity Sector budget of 20 MtCO_{2e} for large-scale deployment of renewables. As detailed in Section 11.4.3.2, the Proposed Project will displace carbon dioxide from fossil fuel-based electricity generation, over the proposed 35-year lifespan of the Proposed Wind Farm. Therefore, while there will be greenhouse gas emissions associated with the construction of the Proposed Project, this will take place under the Electricity sector emissions ceiling and will be offset by the operation of the Proposed Wind Farm within its operational life.

Significance of Effects

Based on the assessment above there will be no significant effects with regard to greenhouse gas emissions arising from the construction phase of the Proposed Project.

11.5.3 Operational Phase

11.5.3.1 Greenhouse Gas Emissions

Proposed Wind Farm

The Proposed Wind Farm will generate energy from a renewable source. As detailed in Section 11.4.3.2 above, the Proposed Wind Farm will displace carbon dioxide from fossil fuel-based electricity

generation, over the proposed 35-year lifespan of the Proposed Project. For the purposes of this EIAR, a rated output of 6MW per turbine has been chosen to calculate the anticipated power output of the Proposed Project, which would result in an estimated output of 90MW, displacing approximately, 56,375 tonnes of carbon dioxide per annum from traditional carbon-based electricity generation. This will have a long-term significant positive impact on climate, which is significant.

The operational phase of the Proposed Project will generate additional traffic to the area in the form of light goods vehicles (LGVs) visiting the site 1-2 times per day for inspections but on occasion, daily visits by LGVs and HGVs may be required over short periods during maintenance/component replacement activities. The addition of 1-2 HGVs per week on occasion over the 35-year lifetime of the Proposed Project will give rise to a long-term imperceptible negative effect on climate which is not significant. LGVs will also be present on site in the form of public vehicle access for the local community. Amenity visitors will arrive to the site and park at identified amenity carparks near proposed amenity site entrances (please see Table 4-9 in Chapter 4 for further detail). The anticipated number of LGVs visiting the Proposed Wind Farm during the operational phase (up to a maximum of 40 car trips per day, i.e., 20 cars, based on information from other similar Bord na Móna facilities), spread across carparks located between 1.8km and 4km from each other will give rise to a long-term imperceptible negative impact, and is Not Significant.

Some potential long-term slight negative impacts that may occur during the operational phase of the Proposed Wind Farm are the release of carbon dioxide to the atmosphere due to maintenance and monitoring activities, including the removal of carbon fixing vegetation as part of the proposals detailed in Section 3 of the Biodiversity Management and Enhancement Plan (Appendix 6-5), as well as peat reinstatement and associated drainage.

Please note that the requirements under Condition 10 of the IPC License (P0500-01) will be implemented on the site regardless of the planning permission of the Proposed Project. These measures will serve to reduce greenhouse gas emissions and aim to restore the site to a carbon sink. As these measures are separate from the Proposed Project, they have not been included in the impact assessment.

Proposed Grid Connection

The permanent onsite 220kV substation will be operated and maintained by ESB/EirGrid. No regular visits are required for the Proposed Grid Connection; however HGVs may be required to visit the site for maintenance/substation component replacement. On occasion, the removal of hydrocarbons (transformer oil) and waste from substation welfare facilities will be undertaken by a licenced waste disposal company. This will give rise to a long-term imperceptible negative effect on climate, which is Not Significant.

Transport to and from the Proposed Project site

In the unlikely event that a turbine blade is damaged and must be replaced during the operational phase, emissions will arise from the transportation of the replacement turbine blade(s) to the Proposed Project site and re-instatement of the turbine delivery accommodation works at Kennedys Cross, This impact will be short-term, negative and slight only, therefore it is not significant. Emissions resulting from routine maintenance at Proposed Wind Farm are included in the section '*Proposed Wind Farm*' above.

Waste Disposal

Waste is not proposed to be generated onsite during the operational phase, any waste that does arise will be minimal and any impact will be short-term, negative and imperceptible, which is not significant. Waste management will be carried out in accordance with '*Best Practice Guidelines on the Preparation*

of Resource and Waste Management Plans for Construction & Demolition Projects' (2021) produced by the EPA.

Mitigation

- Ensure that all maintenance and monitoring vehicles will be maintained in good operational order while onsite, and, when stationary, be required to turn off engines thereby minimising any emissions that arise.

Residual Effect

Following implementation of the mitigation measures above, residual effects of greenhouse gas emissions arising from the operational phase of the Proposed Project will have potential long-term imperceptible negative effect on Climate, which is Not Significant.

Please note, as identified above in Section 11.4.3.2, the carbon storage capacity of restored habitats will vary over time as vegetation matures and land use and the baseline environment change. Therefore, while it can be assumed that measures outlined in the BMEP will result in an increased capacity of carbon storage due to the carbon storage potential that exists within these habitats, to ensure this assessment is completed under a theoretical precautionary scenario the quantification of these potential carbon savings (via an increase in carbon storage potential) associated with these measures has not been included.

The operation of the Proposed Project will displace carbon dioxide from fossil fuel-based electricity generation, over the proposed 35-year operational lifespan due to the provision of clean renewable energy to the national grid. Therefore, while there will be greenhouse gas emissions associated with the operation of the Proposed Wind Farm, through the use of monitoring and maintenance vehicles, this will be offset by the operation of the Proposed Wind Farm within the 35-year operational life.

This will have a long-term moderate positive effect on climate as a result of reduced greenhouse gas emissions during the operational phase, which is Not Significant.

Significance of Effects

Based on the assessment above there will be no significant effects with regard to greenhouse gas emissions arising from the operational phase of the Proposed Project.

11.5.4 Decommissioning Phase

The wind turbines proposed as part of the Proposed Wind Farm are expected to have a lifespan of approximately 35-years. Following the end of their useful life, the equipment may be replaced with a new technology, subject to planning permission being obtained, or the Proposed Wind Farm will be decommissioned fully.

Upon decommissioning of the Proposed Wind Farm, the wind turbines and the met mast would be disassembled. All above-ground turbine and mast components would be separated and removed from the site for recycling. Turbine and mast foundations would remain underground and would be covered with peat and allowed to revegetate. Leaving the foundations in-situ is considered a more environmentally prudent option, as to remove that volume of reinforced concrete from the ground could result in significant temporary environmental nuisances such as noise, dust and vibration. Site roadways will be used during the operational phase for maintenance and monitoring purposes, as well as for amenity by the local community. Therefore, the site roads will be retained post decommissioning to continue to facilitate amenity use.

The underground electrical cabling connecting the proposed turbines and met mast to the proposed onsite 220kV substation will be removed from the cable ducts and any direct buried cables will be cut and left in situ. The cabling will be pulled from the cable ducts using a mechanical winch which will extract the cable and re-roll it on to a cable drum. This will be undertaken at the original cable jointing pits which will be excavated using a mechanical excavator and will be fully re-instated once the cables are removed. The ground above original pulling pits will be excavated using a mechanical excavator and will be fully re-instated once the cables are removed.

The cable ducting will be left in situ as it is considered the most environmentally prudent option, avoiding unnecessary excavation and soil disturbance. The cable materials will be transferred to a suitable recycling or recovery facility.

The Proposed Grid Connection infrastructure, including the proposed onsite 220kV substation, will remain in place as it will be part of the National Electricity Grid network under the ownership and control of the ESB Networks and/or EirGrid.

Any impact and consequential effect that occurs during the decommissioning phase are similar to that which occur during the construction phase, albeit of lesser impact. The mitigation measures prescribed for the construction phase of the Proposed Project will be implemented during the decommissioning phase thereby minimising any potential impacts. The decommissioning of the Proposed Wind Farm will be completed in compliance with the requirements of the Rehabilitation Plan for Lemanaghan Bog as appropriate.

A Decommissioning Plan has been prepared (Appendix 4-8). The Decommissioning Plan will be updated prior to the end of the operational period in line with best-practice decommissioning methodologies that may exist at the time and will agree with the competent authority at that time. The potential for effects during the decommissioning phase of the Proposed Project has been fully assessed in the EIAR.

11.6 Cumulative Assessment

Potential cumulative effects on climate between the Proposed Project and other permitted or proposed plans in the area, (wind energy or otherwise), as set out in Section 2.10 in Chapter 2 of this EIAR, were also considered as part of this assessment. The developments considered as part of the cumulative effect assessment are described in Section 2.10 of this EIAR and presented in Appendix 2-3; please see Table 2.7 of Chapter 2 for the relevant cumulative assessment boundary justification.

As part of the IPC licence rehabilitation requirements, BnM is required to produce cutaway bog decommissioning and rehabilitation plans, please see Appendix 2-4 to view the Draft Rehabilitation Plan for Lemanaghan Bog. These plans have considered the Proposed Project footprint and demonstrate that both peatland rehabilitation and renewable energy can coexist harmoniously onsite. Irrespective of any further development on the site, BnM's statutory duties to discharge the conditions of its IPC Licence will remain ongoing.

The Peatland Climate Action Scheme (PCAS) comprises enhanced peatland rehabilitation (above and beyond IPC licence requirements). As identified in Section 2.10.2.4 of Chapter 2, PCAS is proposed in bogs in the vicinity and adjacent to the Proposed Project site; PCAS will not occur within the site and does not form part of the Proposed Project application. Please note, PCAS activities in the vicinity and adjacent to the Proposed Project site have been cumulatively assessed.

11.6.1 Construction Phase

During the construction phase of the Proposed Project and other permitted or proposed projects and plans in the area as set out in Section 2.10 in Chapter 2 of this EIAR, that are yet to be constructed, there will be greenhouse gas emissions arising from production of construction materials (such as

concrete), and the operation of construction vehicles and plant. These will be restricted to the duration of the construction phase, and as such will give rise to emissions over a short-term duration. However, once emitted to the atmosphere, the greenhouse gas emissions that will arise from construction phase activities will have a permanent, imperceptible, negative effect on climate, which is Not Significant.

As identified in Section 11.4.3.1.1 the percentage loss of carbon sequestration potential within the site arising from the construction of the Proposed Project is determined to range from 8.2% - 17.6%, this will have a long-term, slight, negative cumulative effect on climate.

Substitute Consent and EPA Licensed Activities

As identified in Table 2-2 in Chapter 2, an application for substitute consent was submitted to An Coimisiún Pleanála (Case Ref: SU19.323676) on 12th September 2025, for peat extraction and ancillary works from July 1988 to the present day that have been carried out within Lemanaghan Bog. A Remedial Natura Impact Statement (rNIS) and Remedial Environmental Impact Assessment Report (rEIAR) was submitted with this application. Impacts on climate within the substitute consent application during identified activities to be carried out on Lemanaghan Bog in the future were determined to be long-term, neutral and not significant due to the provisions outlined in the Draft Rehabilitation Plan which has been updated since the substitute consent application to ACP on 12th September 2025.

The implementation of the Draft Rehabilitation Plan in conjunction with the construction phase of the Proposed Project as well as proposed, permitted and operational plans and projects listed in Chapter 2 of its EIAR is considered. It is the intention of the BnM to integrate the peatland remedial measures proposed in the draft Cutaway Bog Decommissioning and Rehabilitation Plan that as submitted as part of the substitute consent project with the Proposed Project. Overall, there are no significant negative cumulative effects on climate when considering the future works associated with the Lemanaghan Bog (i.e., the Draft Rehabilitation Plan submitted as Appendix 2-4 to the EIAR) and the Proposed Project.

Peatland Climate Action Scheme

In 2023 the Peatland Climate Action Scheme (PCAS) selected Ballaghurt and Glebe Bogs located approximately 4.4km west of the Proposed Wind Farm at its closest point (i.e., T01), Clynan Bog located approximately 25.5km north of the Proposed Grid Connection, and Killeglan Bog located approximately 28.1km northwest of the Proposed Grid Connection for PCAS. In 2024, PCAS has selected Curraghalassa Bog and Derrynagun bog which are adjacent to the Proposed Project site. These two areas are on the southern side of the R436 road which connects Fermbane, Co. Offaly to Ballycumber, Co. Offaly.

If the enhancement peatland rehabilitation measures proposed for the above listed bogs occur simultaneously with the construction phase of the Proposed Project, carbon losses associated construction activities and traffic and transportation movements of vehicles and plant will have a negative cumulative effect in conjunction with the PCAS works ongoing in the above listed bogs during construction.

11.6.2 **Operational Phase**

The nature of the Proposed Project is such that, once operational, it will have a long-term, moderate, positive effect on climate. However, as noted above, the Proposed Project will offset the 261,360 tonnes of CO₂ associated with the construction and operational phase that will be lost to the atmosphere (Section 11.4.3.2) in approximately 56 months of operation.

When considering these greenhouse gas emissions within the context of the Electricity Sector Emissions Ceilings detailed in Section 11.2.2, Carbon Budget 1 (2021-2025) has an Electricity Sector budget of 40 MtCO₂e and Carbon Budget 2 (2026-2030) has an Electricity Sector budget of 20 MtCO₂e for large-scale deployment of renewables. As detailed in Section 11.4.3.2, the Proposed Project will displace

carbon dioxide from fossil fuel-based electricity generation, over the proposed 35-year lifespan of the Proposed Project. Therefore, while there will be greenhouse gas emissions associated with the construction of the Proposed Project, this will take place under the Electricity sector emissions ceiling and will be offset by the operation of the Proposed Project within its operational life. Thus, there will be no negative cumulative effects arising on climate from the Proposed Project and other permitted or proposed projects and plans in the area as set out in Section 2.10 in Chapter 2 of this EIAR.

Substitute Consent and EPA Licensed Activities

The substitute consent application for peat extraction and ancillary works from July 1988 to the present day that have been carried out within Lemanaghan Bog identified that activities to be carried out on Lemanaghan Bog in the future would result in a long-term, neutral and not significant effect due to the provisions outlined in the Draft Rehabilitation Plan submitted as part of the substitute consent application.

The Draft Rehabilitation Plan for Lemanaghan Bog (Appendix 2-4), prepared in accordance with Condition 10 of IPC Licence Ref. P0500-01, recognises that the surface topography of the site is heterogeneous. As a result, it is not feasible to re-wet all areas to achieve optimum carbon sequestration conditions. In relatively drier areas, rehabilitation is likely to result in the establishment of dry woodland or other dry habitat types. In areas where optimal re-wetting conditions can be achieved, time will be required for ecological transition and habitat maturation before full carbon sequestration functionality is restored.

The carbon storage capacity of restored peatland habitats will vary over time as vegetation establishes, hydrological conditions stabilise, and baseline environmental conditions evolve. While rehabilitation measures are expected to increase Lemanaghan Bog's overall carbon storage potential relative to its current condition, the assessment of long-term climate benefits is unquantifiable. Accordingly, the cumulative carbon sequestration benefits associated with the Proposed Project and the future implementation of the Draft Rehabilitation Plan cannot be determined at this stage. However, it can be assumed that the implementation of measures in the Draft Rehabilitation Plan and the operation of the Proposed Project will result in a positive cumulative effect. Further, cumulatively, the Proposed Project and the Draft Rehabilitation Plan would assist in nation goal of achieving a climate neutral Ireland by 2050 as set out in the Climate Action and Low Carbon Development (Amendment) Act 2021.

Peatland Climate Action Scheme

As identified in Section 11.6.1 above, PCAS is to be implemented on Ballaghurt and Glebe Bogs, Clynan Bog, Killeglan Bog, Curraghalassa Bog and Derrynagun Bog, which are all located in the surrounding area of the Proposed Project site.

PCAS represents enhanced peatland rehabilitation measures that go beyond the requirements of the IPC licence. These measures are designed to stabilise former industrial peat production areas and restore peatland hydrology. Enhanced rehabilitation will facilitate the transition of these bogs from degraded cutover peat toward functioning carbon sinks, thereby reducing ongoing carbon emissions and promoting long-term carbon sequestration.

As outlined in Section 11.4.3.2, the Proposed Wind Farm will generate renewable electricity over its 35-year lifespan, displacing carbon dioxide emissions from fossil fuel-based generation. The carbon savings associated with the Proposed Project will therefore have a long-term moderate positive effect on climate.

When considered cumulatively, the renewable energy generation from the Proposed Project and the peatland restoration measures under PCAS will result in an overall positive cumulative effect on climate during the operational phase.

11.6.3 Decommissioning Phase

The works required during the decommissioning phase are described in Section 4.13 in Chapter 4: Description of the Proposed Project. Any cumulative effect and consequential effect that occurs during the decommissioning phase are similar to that which occur during the construction phase, albeit of lesser effect. The mitigation measures prescribed for the construction phase of the Proposed Project will be implemented during the decommissioning phase thereby minimising any potential cumulative effects.

Post decommissioning of the Proposed Wind Farm, the requirements of Condition 10, under the IPC 500-01 license of the Boora Bog Group, within which part of the Proposed Project site is located, will be agreed by the EPA and carried out on Lemanaghan Bog. As identified in Section 11.4.3.1 above, the site will undergo a percentage loss of carbon sequestration potential due to the construction and operational phase footprint of the Proposed Project. During the decommissioning phase, the permanent footprint of the site will remain largely the same due to the elements of the Proposed Project (i.e., construction compound foundations, roads, amenity track, etc.) that will remain in situ. Therefore, it can be assumed that the immediate footprint of the Proposed Project will not return to full sequestration capabilities, however the carbon sequestration potential of the area surrounding the Proposed Project will improve as a result of Condition 10 of the IPC licence.

The emissions associated with the Decommissioning Phase activities will have a long-term, Not Significant, neutral cumulative effect on climate.

11.7 EIA Classification Summary

Please see the below table for a summary of all identified impacts for the Proposed Project relating to greenhouse gas emissions.

Table 11-7 Impact Assessment Classification Summary

| Topic | Pre-Mitigation Effect | Mitigation Section Reference | Residual Effect | Significance |
|---------------------------|---------------------------------------------------------------------|------------------------------|------------------------------------|-----------------|
| Construction Phase | | | | |
| Greenhouse Gas Emissions | Short-Term, Slight, Negative | Section 11.5.2 | Permanent, Imperceptible, Negative | Not Significant |
| Operational Phase | | | | |
| Greenhouse Gas Emissions | Proposed Wind Farm: Long-Term, Imperceptible, Negative | Section 11.5.3 | Long-Term, Moderate, Positive | Not Significant |
| | Proposed Grid Connection: Long-Term, Imperceptible, Negative | | | |

| | | | | |
|------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-----|-----|
| | <p>Transportation: Short-Term, Slight, Negative</p> <p>Waste Disposal: Short-Term, Imperceptible, Negative</p> | | | |
| Decommissioning Phase | | | | |
| Climate | <p>Any impact and consequential effect that occurs during the decommissioning phase will be similar to that which occurs during the construction phase, however to a lesser extent and lesser duration, and the mitigation measures outlined in Section 11.5.2 will be implemented during the decommissioning phase also</p> | 11.5.2 | N/A | N/A |