11. CLIMATE

11.1 Introduction

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

The objective of this assessment is to assess the potential effects that the Proposed Development may have on Climate and sets out proposed mitigation measures to avoid, reduce or offset any potential significant effects that are identified.

The aim of the Proposed Development when in operation is to reduce the input of carbon intensive energy into the national grid and reduce the amount of greenhouse gas (GHG) emissions being released to the atmosphere that are associated with electricity generation and use. 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.

11.1.1 Background

The Proposed Development is located south of Maumakeogh Mountain, 5.3km southwest of the village of Ballycastle and 5km south of the Atlantic Coastline, in north County Mayo. The Proposed Development site covers an area of 1,810 hectares and incorporates the townlands of Lugnalettin, Altderg, Glenora and Ballykinlettragh. The grid connection includes for 110kV on-site substation and associated works, including underground 110kV cabling to connect to the national grid at the existing Tawnaghmore 110kV substation, in the townland of Tawnaghmore Upper, Co. Mayo. The underground cabling route to Tawnaghmore, measuring approximately 26.1km in length, is primarily located within the public road corridor. The townlands within which the Proposed Development site, ancillary works and grid connection cabling route are located can be found in Chapter 1 Table 1-1 of this EIAR.

Current land-use on the Proposed Development comprises commercial forestry, underlain by blanket peat. Current land-use along the grid connection comprises of public road corridor, pastureland, peat bogs, and transitional woodland-shrub. Land-use in the wider landscape of the Proposed Development comprises a mix of agriculture, peat cutting, low density residential and commercial forestry.

11.1.2 Relevant Guidance

The climate section 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 1.2.2 of Chapter 1: Introduction. Due to the nature of the Proposed Development, a wind farm project, the following methodology and guidance was utilised for the climate section of this EIAR:

- Calculating Carbon Savings from Wind Farms on Scottish Peat Lands' (University of Aberdeen and the Macauley Institute 2008); and
- 'Wind Farms and Carbon Savings' (Scottish Natural Heritage, 2003).
- Macauley Institute Carbon Calculator for Wind Farms on Scottish Peatlands (Version 1.7.0) (2022)
- Transport Infrastructure Ireland (TII) Carbon Assessment Tool (Version 0.6.19) (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 Transport Infrastructure Ireland Carbon Tool for Road and Light Rail Projects: User Guidance Document, GE-ENV-01106 (TII 2022d).

11.2 Statement of Authority

This section of the EIAR has been prepared by Catherine Johnson and reviewed by Ellen Costello, both of MKO. Catherine is an Environmental Scientist and Climate Practitioner at MKO with over one year of consultancy experience in climate 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. Ellen is a Project Environmental Scientist and Climate Practitioner with over four years of consultancy experience with MKO and has been involved in a range of projects including climate and sustainability context reports for masterplans and commercial developments, renewable energy infrastructure projects, and the compilation of numerous chapters including the preparation of air and climate assessments for Environmental Impact Assessment Reports. Ellen holds a BSc. in Earth Science and a MSc. in Climate Change: Integrated Environmental and Social Science Aspects where she focused her studies on climate adaptation and mitigation, and its implications on environment and society.

11.2.1 Scoping and Consultation

The scope for this chapter of the EIAR has also been informed by consultation with statutory consultees, bodies with environmental responsibility and other interested parties. This consultation process and the List of Consultees is outlined in Section 2.6 of this EIAR. Matters raised by Consultees in their responses with respect to climate are summarised in Table 11-1 below.

Table 11-1 Summary of Climate Related Scoping Response

Consultee	Description	Addressed in Section
Transport Infrastructure Ireland (TII)	TII recommends that the development include the following points relating to climate: › The developer, in preparing EIAR, should have regard to TII's Environmental Assessment and Construction Guidelines, including the 'Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes' (National Roads Authority (NRA), 2006). ›	Section 11.1.2. Due to the interrelationship between air quality and climate consideration has also been given to Chapter 10 of this EIAR: Air Quality.

11.3 Climate Change and Greenhouse Gases

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 us today and is primarily the result of increased levels of greenhouse gases in the atmosphere. Greenhouse gases, when emitted, create a 'greenhouse effect' in the

atmosphere, effectively trapping heat near the earth surface, resulting in higher temperatures and a warming planet. Greenhouse gases come primarily from the combustion of fossil fuels in energy use. Changing climate patterns are thought to increase the frequency of extreme weather conditions such as storms, floods and droughts. In addition, warmer weather trends can place pressure on animals and plants that cannot 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.

11.3.1 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.

International greenhouse gas emission and climate targets play an important role in stimulating and enabling action for developed and developing nations. The following sections provide an overview of the international agreements that have played key roles in establishing climate governance.

11.3.1.1 Kyoto Protocol

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 (GHGs). It set limitations and reduction targets for greenhouse gases for developed countries. 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.

Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total greenhouse gas emissions in the period 2008 to 2012. These EU emission targets are legally binding in Ireland. Ireland's contribution to the EU commitment for the period 2008 – 2012 (the first commitment period) was to limit its greenhouse gas emissions to no more than 13% above 1990 levels. Ireland achieved its Kyoto Protocol targets under the EU burden-sharing agreement.

11.3.1.1.1 *Doha Amendment to the Kyoto Protocol*

In Doha, Qatar, on 8th December 2012, the "Doha Amendment to the Kyoto Protocol" was adopted. The amendment includes:

- 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.
    - The amendment entered into force on 31 December 2020
- A revised list of greenhouse gases (GHG) to be reported on by Parties in the second commitment period; and
- Amendments to several articles of the Kyoto Protocol which specifically referenced issues pertaining to the first commitment period and which needed to be updated for the second commitment period.

During the first commitment period, 37 industrialised countries and the European Community committed to reduce GHG emissions to an average of 5% below 1990 levels. During the second commitment period, Parties committed to reduce GHG emissions by at least 18% below 1990 levels in the eight-year period from 2013 to 2020. The composition of Parties in the second commitment period is different from the first; however, Ireland and the EU signed up to both the first and second

commitment periods. Under the protocol, countries must meet their targets primarily through national measures, although market-based mechanisms (such as international emissions trading) can also be utilised.

Although the 1997 Kyoto Protocol and 2012 Doha Amendment were in force in 2020, the 2015 Paris Agreement superseded the Kyoto Protocol as the principle regulatory instrument governing the global response to climate change.

11.3.1.2 COP21 Paris Agreement

COP21 was the 21st session of the Conference of the Parties (COP) to the United Nations Convention. Every year since 1995, the 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. COP21 was organised by the United Nations in Paris and held from 30th November to 12th December 2015.

COP21 closed on 12th December 2015 with the adoption of the first international climate agreement (concluded by 195 countries and applicable to all). The twelve-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. It is flexible and takes into account the needs and capacities of each country. It is balanced as regards adaptation and mitigation, and durable, with a periodical ratcheting-up of ambitions.

11.3.1.3 COP25 Climate Change Conference- Madrid

The 25th United Nations Climate Change conference COP25 was held in Madrid and ran from December 2nd to December 13th, 2019. While largely regarded as an unsuccessful conference, the European Union launched its most ambitious plan, 'The European Green New Deal' which aims to lower CO_2 emissions to zero by 2050. The deal includes proposals to reduce emissions from the transport, agriculture and energy sectors and will affect the technology chemicals, textiles, cement, and steel industries. Measures such as fines and pay-outs by member states who rely on coal power will be in place to encourage the switch to renewable clean energies such as wind. On the 4th of March 2020, the European Commission put forward the proposal for a European climate law. This aims to establish the framework for achieving EU climate neutrality. It aims to provide a direction by setting a pathway to climate neutrality and to this end, aims to set in legislation the EU's 2050 climate-neutrality objective.

11.3.1.4 COP27 Climate Change Conference - Sharm El-Sheikh

COP27 took place in Sharm el-Sheikh from the 6th of November 2022 to the 20th of November. The Conference of the Parties (COP) is a supreme decision-making body of the United Nations Framework Convention on Climate Change (UNFCCC).

The three major topics of COP27 were:

- Closing the emissions gap to keep 1.5°C alive
- Loss and damage
- Climate finance

The summit took place a year after its precedent COP26 summit in Glasgow, Scotland. In Glasgow, the final agreement was delayed due to the stance of China and India, among others, who were not comfortable with the wording on the 'phase out' of coal in the draft text. This led to the watering down of this commitment to a 'phase down' of coal use. The hope was that COP27 would work to include further language on coal and fossil fuel reduction efforts and be matched by increased ambition and action to meet agreed pledges. Initial texts represented more serious language than used at COP26 in

Glasgow, however, the published final text retains the language of Glasgow, phase down, which does not use any binding language to reduce use and is still only applicable to coal, not oil and gas.

There has been the setting of a workplan for 2023 to help articulate the nature and components of a global collective goal on adaptation and resilience, however in order to achieve this, more work needs to be done by countries, cities and organisations as currently, the numbers on the NDCs don't add up. Currently, no country has an NDC in place that is able to meet Paris Agreement goals, making net zero by 2050 difficult to envision and 2030 commitments near impossible.

11.3.1.5 COP28 Climate Change Conference – Dubai

At the time of drafting the 28th annual Conference of the Parties for the UNFCCC was underway in Dubai. COP28 began on the 30th of November and will finish on the 12th of December. One of the main topics discussed at COP28 will be the Global Stocktake. The Global Stocktake is the main mechanism by which progress against the 2015 Paris Agreement is assessed, i.e., how are countries' commitments stacking up against the Paris target of limiting warming to less than 1.5°C. Current commitments under the Paris Agreement will fail to meet what is required to limit warming to 1.5°C, therefore the outcome of the Global Stocktake is expected to include increased commitments and recommendations to address climate change.

Other topics of discussion expected to take place at COP28 include the energy transition, with further detailing on language used around the phasing out or, at a minimum, phasing down of fossil fuels. Loss and damage was highlighted during COP27 and a first of its kind fund was established for vulnerable countries. To utilise this fund, there is a significant body of work that needs to be done at COP28 – the fund has to be set up and recommendations and regulations need to be agreed on which countries should put money in, what for and how much, and who will receive money from the fund.

As COP28 was ongoing at the time of drafting, the final outcomes are not discussed here.

11.3.1.6 United Nations Sustainable Development Goals Report 2023

Transforming our World: the 2030 Agenda for Sustainable Development which includes 17 Sustainable Development Goals (SDGs), and 169 targets was adopted by all UN Member States at a UN summit held in New York in 2015. The agenda is universally applicable with all countries having a shared responsibility to achieve the goals and targets which came into effect on January 1st, 2016. The goals and targets are to be actions over the 15-year period, are integrated and indivisible i.e., all must be implemented together by each Member State. On 10th July 2023, the United Nations published '*The Sustainable Development Goals Report 2023*'[1], highlighting that the lasting impacts of the COVID-19 pandemic, the war in Ukraine and subsequent refugee crisis, and the increasing consequences of the climate crisis have hindered the achievement of the SDGs. The report stipulates that due to these unprecedented events, the world is falling short of meeting most of the SDGs by 2030, especially in terms of climate action. An assessment of the around 140 targets for which trend data is available shows that about half of these targets are moderately or severely off track; and over 30% have either seen no movement or regressed below the 2015 baseline.

In October 2022 the Department of Communications, Climate Action & Environment, in partnerships with all Government Departments, key stakeholders, and based on input from two public consultation processes, published the Sustainable Development Goals National Implementation Plan 2022-2024.[2] The Plan identifies that, overall, the world is not on track to achieve the global Goals by 2030. The Plan sets out how Ireland will work to achieve the goals and targets of the Agenda for Sustainable

[1] *The Sustainable Development Goals Report Special Edition. Available at: <https://unstats.un.org/sdgs/report/2023/The-Sustainable-Development-Goals-Report-2023.pdf>*
[2] *National Implementation Plan for the Sustainable Development Goals 2022-2024. Available at: <https://www.gov.ie/en/publication/e950f-national-implementation-plan-for-the-sustainable-development-goals-2022-2024/>*

Development both domestically and internationally. Irelands first National Implementation Plan provided a framework for Ireland to work towards the implementation of the SDGs; the new Implementation Plan aims to build on the structures and mechanisms from the first Plan and to develop and integrate additional approaches in areas identified as requiring further action.

In September 2023, the UN Summit on the SDGs took place in New York and was co-facilitated by Ireland and Qatar. Representing the halfway mark to achieving the SDGs by 2030, it marked the beginning of a new phase of accelerated progress towards the SDGs with high-level political guidance on transformative and accelerated actions. The Global Sustainable Development Report 2023[3] was published in September 2023. The previous Global Sustainable Development Report (2019) found that for some targets the global community was on track, but for many others the world would need to quicken the pace. In 2023, the situation is much more worrisome owing to slow implementation and a confluence of crises. The 2023 Report goes on to highlight the current standing of each SDG and its relevant indicators. A 2023 UN Special Report[4] found that over 30% of the SDGs have seen either no improvement or reverse trends in progress. The push for transformation to achieve the SDGs will come by through shifts in six key entry points:

1. *Human Well Being and Capabilities*
2. *Sustainable and Just Economies*
3. *Food Systems and Healthy Nutrition*
4. *Energy Decarbonisation with Universal Access*
5. *Urban and Peri-Urban Development*
6. *Global Environmental Commons*

The Proposed Development will contribute to Entry Point 4 due to the clean and renewable energy it will provide over its operational life. The phase out of fossil fuels in a manner that is globally and domestically just, while strengthening the transition to renewables by increasing energy efficiency and encouraging behavioural change will be key to achieving the relevant SDGs to the Proposed Development.

Relevant SDGs to the Proposed Development and how they are implemented into Irish National plans and policies can be found in Table 11-2.

[3] *Global Sustainable Development Report 2023* <https://sdgs.un.org/sites/default/files/2023-09/FINAL%20GSDR%202023-Digital%20-110923_1.pdf>
[4] *The Sustainable Development Goals Report 2023: Special Edition* <https://unstats.un.org/sdgs/report/2023/The-Sustainable-Development-Goals-Report-2023.pdf>

Table 11-2 Sustainable Development Goals Report 2023, Relevant SDGs to the Proposed Development, and Implementation into Irish National Plans

SDG	Targets	International Progress/ downfalls to Date (2023)	National Relevant Policy
SDG 7 Affordable and Clean Energy: *Ensure access to affordable, reliable, sustainable and modern energy for all*	› By 2030, ensure universal access to affordable, reliable and modern energy services › By 2030, increase substantially the share of renewable energy in the global energy mix › By 2030, double the global rate of improvement in energy efficiency › By 2030, enhance international cooperation to facilitate access to clean energy research and technology, including renewable energy, energy efficiency and advanced and cleaner fossil-fuel technology, and promote investment in energy infrastructure and clean energy technology › By 2030, expand infrastructure and upgrade technology for supplying modern and sustainable energy services for all in developing countries, in particular least developed countries, small island developing States, and land-locked developing countries, in accordance with their respective programmes of support	The war in Ukraine and global economic uncertainty continue to cause significant volatility in energy prices, leading some countries to raise investments in renewables and others to increase reliance on coal, putting the green transition at risk. The share of renewable sources in total final energy consumption amounted to 19.1% globally in 2020, or 2.4 percentage points higher than in 2015. Part of this progression is due to lower final energy demand in 2020, as the pandemic disrupted social and economic activities worldwide. The electricity sector shows the largest share of renewables in total final energy consumption (28.2% in 2020) and has driven most of the growth in renewable energy use, while the heat and transport sectors have seen limited progress over the past decade. The rate of improvement in primary energy intensity, which had already slowed in recent years, dropped to 0.6% in 2020. This makes it the worst year for energy intensity improvement since the global financial crisis. This slowdown was influenced by a shift in the economic structure during Covid towards more energy-intensive industrial production, combined with only modest rates of technical efficiency improvements, in the context of low energy prices.	*Ireland's Transition to a Low Carbon Energy Future 2015-2030;* *Energy Poverty Action Plan;* *Ireland's Transition to a Low Carbon Energy Future 2015-2030;* *National Mitigation Plan;* *National Energy Efficiency Action Plan;* *One World, One Future;* *The Global Island* *Economic Recovery Plan* *Project Ireland 2040: National Planning Framework;* *Project 2040;* *National Development Plan 2021-2030;* *Climate Action Plan 2023*
SDG 9: Industry, Innovation, and Infrastructure	› Develop quality, reliable, sustainable and resilient infrastructure, including regional and transborder infrastructure, to support economic development and	The manufacturing industry's recovery from COVID-19 remains incomplete and uneven: some high-income regions achieved record-high manufacturing value added	*National Development Plan 2021-2030;* *National Economic Recovery Plan;*

SDG	Targets	International Progress/ downfalls to Date (2023)	National Relevant Policy
Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation	human well-being, with a focus on affordable and equitable access for all. › Promote inclusive and sustainable industrialization and, by 2030, significantly raise industry's share of employment and gross domestic product, in line with national circumstances, and double its share in least developed countries › Support domestic technology development, research and innovation in developing countries, including by ensuring a conducive policy environment for, inter alia, industrial diversification and value addition to commodities	per capita in 2022 but levels in least developed countries were not much higher than the 2015 baseline. Global carbon dioxide (CO2) emissions from energy combustion and industrial processes grew by 0.9% in 2022 to a new all-time high of 36.8 billion tonnes. Emissions shrank by more than 5% in 2020, but rebounded past pre – pandemic levels in 2021, growing more than 6% in tandem with economic stimulus and a surge in coal demand even as renewables capacity additions scaled record heights. CO2 growth in 2022 was well below GDP growth of 3.2%.	*Climate Action Plan 2023;* *National Implementation Plan on Persistent Organic Pollutants;* *Waste Action Plan for a Circular Economy;* *National Waste Prevention Programme;* *A Better World*
SDG 11: Sustainable Cities and Communities *Make cities and human settlements inclusive, safe, resilient and sustainable*	› By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums › By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons › Strengthen efforts to protect and safeguard the world's cultural and natural heritage › By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management	Climate change, the pandemic, and conflicts tend to have a disproportionate impact on cities. These factors mean that the world is far from achieving the goal of sustainable cities. In many developing countries, slum populations have been growing, putting at risk the target of adequate housing for all by 2030. Since 2015, the number of countries with national disaster risk reduction strategies has more than doubled. According to 2022 data from 1,507 cities in 126 countries, only 51.6% of the world's urban population has convenient access to public transport, with considerable variations across regions. Data for 2020 from 1,072 cities in 120 countries indicate that more than three-quarters of these cities have less than	*Rebuilding Ireland Action Plan for Housing and Homelessness;* *Housing for All;* *EU Regulation 1370/2007 on Public Passenger Transport Services by Rail and by Road;* *Project Ireland 2040 National Planning Framework;* *National Clean Air Strategy;* *Rural Development Programme 2014-2022;* *National Implementation Plan on Persistent Organic Pollutants;* *Waste Action Plan for a Circular Economy;*

SDG	Targets	International Progress/ downfalls to Date (2023)	National Relevant Policy
		20% of their area dedicated to open public spaces and streets, about half of the proportion recommended. By the end of 2022, 102 countries reported having local governments with disaster risk reduction strategies, an increase from 51 countries in 2015.	*National Waste Prevention Programme;* *A Better World*
SDG 12 Responsible Consumption and production: *Ensure sustainable consumption and production patterns.*	› By 2030, achieve the sustainable management and efficient use of natural resources. › By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment › Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle › Promote public procurement practices that are sustainable, in accordance with national policies and priorities. › Develop and implement tools to monitor sustainable development impacts for sustainable tourism that creates jobs and promotes local culture and products	Unsustainable patterns of consumption and production are the root cause of the triple planetary crisis: 1. *Climate Change* 2. *Biodiversity Loss* 3. *Pollution* The world is seriously off track in its effort to halve per-capita food waste and losses by 2030.The COVID-19 pandemic has had significant impacts on consumption and production patterns, with disruptions to global supply chains and changes in consumer behaviour. Responsible consumption and production must be an integral part of the recovery from the pandemic. But the global economy also needs to speed up the decoupling of economic growth from resource use by maximizing the socio-economic benefits of resources while minimizing their negative impacts. Reporting on corporate sustainability has tripled since the beginning of the SDG period, but the private sector will need to significantly improve reporting on activities that contribute to the SDGs. Global data showed a rise in fossil fuel subsidies in 2021, after a brief fall in 2020 which was largely caused by a drop in energy prices. In 2021, Governments spent an	*National Implementation Plan on Persistent Organic Pollutants;* *Waste Action Plan for a Circular Economy;* *National Waste Prevention Programme;* *Climate Action Plan 2023* *Tourism Action Plan;* *National Clean Air Strategy;* *Towards Responsible Business: Ireland's Second National Plan on Corporate Social Responsibility (CSR) 2017-2020;* *Sustainable, Inclusive and Empowered Communities 2019-2024;* *Climate Action Plan 2023*

SDG	Targets	International Progress/ downfalls to Date (2023)	National Relevant Policy
		estimated $732 billion on subsidies to coal, oil, and gas, against $375 billion in 2020. This brings the subsidies back to pre-2015 levels. High oil and gas prices in 2022 will likely bring a new increase, as subsidies are often linked to the price of energy.	
SDG 13 Climate Action: *Take urgent action to combat climate change and its impacts** **Acknowledging that the United Nations Framework Convention on Climate Change is the primary international, intergovernmental forum for negotiating the global response to climate change.*	› Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries › Integrate climate change measures into national policies, strategies and planning › Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning	The world is on the brink of a climate catastrophe and current actions and plans to address the crisis are insufficient. Without transformative action starting now and within this decade to reduce greenhouse gas emissions deeply and rapidly in all sectors, the 1.5°C target will be at risk and with it the lives of more than 3 billion people. Failure to act leads to intensifying heatwaves, droughts, flooding, wildfires, sea-level rise, and famines. Emissions should already be decreasing now and will need to be cut almost by half by 2030 - a mere seven years from now. Global temperatures have already hit 1.1°C, rising due to increasing global greenhouse gas emissions, which reached record highs in 2021. Real-time data from 2022 show emissions continuing an upward trajectory. Instead of decreasing emissions as required by the target to limit warming, carbon dioxide levels increased from 2020 to 2021 at a rate higher than the average annual growth rate of the last decade and is already 149% higher than pre-industrial levels. Projected cumulative future CO2 emissions over the lifetime of existing and currently planned fossil fuel infrastructure exceed the total cumulative net CO2 emissions in pathways that limit warming to 1.5°C (>50%) with no or limited overshoot.	*National Adaptation Framework;* *Building on Recovery: Infrastructure and Capital Investment 2016-2021;* *National Mitigation Plan;* *National Biodiversity Action Plan 2017-2021;* *National Policy Position on Climate Action and Low Carbon Development;* *Project 2040: National Development Plan 2021-2030;* *Climate Action Plan 2023;* *National Dialogue on Climate Action;* *Agriculture, Forest, and Seafood Climate Change sectoral Adaptation Plan;* *The National Strategy on Education for Sustainable Development in Ireland*

11.3.1.7 Climate Change Performance Index

Established in 2005, the Climate Change Performance Index (CCPI) is an independent monitoring tool which tracks countries climate protection performance. It assesses individual countries based on climate policies, energy usage per capita, renewable energy implementation and Greenhouse Gas Emissions (GHG) and ranks their performance in each category and overall. The 2023 CCPI was published in November 2022. While the CCPI 2023 indicated signs of potential reductions in global emissions, no country achieved its Paris Climate targets and therefore the first three places of the ranking system remain unoccupied.

Ireland, ranked 46th in 2022, has climbed 9 places to 37th for 2023, however still remains as a "low" performer in international performance. Ireland still remains at "very low" on the Greenhouse Gas Emissions ratings at 47th in the world and is one of the only two EU countries, along with Poland, to receive a "very low" performance rating. However, in the Renewable Energy rating table, Ireland is placed 23rd in the rankings in the "Medium" category.

At the time of drafting the updated CCPI for 2024 was not out, it is expected to be published on the 8th of December at COP28 (discussed above in Section 11.3.1.5).

11.3.2 National Greenhouse Gas Emission and Climate Targets

11.3.2.1 Programme for Government

The Programme for Government was published in October 2020 and last updated April 2021. In relation to climate change the programme recognises that the next ten years are a critical period in addressing the climate crisis. It is an ambition of the programme to more than halve carbon emissions over the course of the decade (2020-2030). 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 also recognises the severity of the climate challenge as it clarifies that:

> *"Climate change is the single greatest threat facing humanity"*

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

The Climate Action and Low Carbon (Amendment) Act 2021 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.

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 this target.

The Act includes the following key elements, among others:

- Places on a statutory basis a 'national climate objective', which commits to pursue and achieve no later than 2050, the transition to a climate resilient, biodiversity-rich, environmentally sustainable and climate-neutral economy.
- Embeds the process of carbon budgeting into law, Government are required to adopt a series of economy-wide five-year carbon budgets, including sectoral targets for each relevant sector, on a rolling 15-year basis, starting in 2021.

- Actions for each sector will be detailed in the Climate Action Plan, updated annually.
- A National Long Term Climate Action Strategy will be prepared every five years.
- Government Ministers will be responsible for achieving the legally binding targets for their own sectoral area with each Minister accounting for their performance towards sectoral targets and actions before an Oireachtas Committee each year.
- Strengthens the role of the Climate Change Advisory Council, tasking it with proposing carbon budgets to the Minister.

Provides that the first two five-year carbon budgets proposed by the Climate Change Advisory Council should equate to a total reduction of 51% emissions over the period to 2030, in line with the Programme for Government commitment.

11.3.2.3 Climate Change Advisory Council 2023

The Climate Change Advisory Council (CCAC) was established on 18th January 2016 under the Climate Action and Low Carbon Development Act 2015. The CCAC aims to provide independent evidence-based advice and recommendations on policy to support Ireland's Just Transition to a biodiversity-rich, environmentally sustainable, climate-neutral, and resilient society.

The Annual Review 2023[5] is the seventh annual review carried out by CCAC and details the CCAC concerns that the necessary national actions are not taking place or being enabled at the required speed, going on to state that 'at the current rate of policy implementation, Ireland will not meet the targets set in the first and second carbon budget periods unless urgent action is taken immediately, and emissions begin to fall much more rapidly.'

11.3.2.4 Carbon Budgets

The first national carbon budget programme proposed by the Climate Change Advisory Council, 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 Table 11-3.

Table 11-3 Proposed Carbon Budgets of the Climate Change Advisory Council

	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2	2031 – 2035 Provisional Carbon Budget 3
	All Gases		
Carbon Budget (Mt CO_2eq)	295	200	151
Annual Average Percentage Change in Emissions	-4.8%	-8.3%	-3.5%
The figures are consistent with emissions in 2018 of 68.3 Mt CO_2eq reducing to 33.5 Mt CO_2eq in 2030 thus allowing compliance with the 51% emissions reduction target by 2030			

[5] *Climate Change Advisory Council 2023 Review* <https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR-2023-FINAL%20Compressed%20web.pdf>

11.3.2.5 Sectoral Emissions Ceilings

The Sectoral Emissions Ceilings were launched in September 2022. The objective of the initiative is to inform on the total amount of permitted greenhouse gas emissions that each sector of the Irish economy can produce during a specific time period. 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.

Section C of the Climate Action and Low Carbon Development (Amendment) Act 2021 provides the minister with a method of preparing the Sectoral Emissions Ceiling within the bounds of the carbon budget. The Sectoral Emission Ceilings for each 5-year carbon budget period was approved by the government on the 28th of July 2022 and are shown in Table 11-4 below.

Table 11-4 Sectoral Emission Ceilings 2022

	Sectoral Emission Ceilings for each 5-year carbon budget period (MtCO2eq.)	
Sector	2021 – 2025 Carbon Budget 1	2026 – 2030 Carbon Budget 2
Electricity	40	20
Transport	54	37
Built Environment-Residential	29	23
Built Environment-Commercial	7	5
Industry	30	24
Agriculture	106	96
LULUCF[1]	Yet to be determined	Yet to be determined
Other (F-Gases, Waste & Petroleum refining)	9	8
Unallocated Savings		*-26*
Total[2]	Yet to be determined	Yet to be determined
Legally binding Carbon budgets and 2030 Emission Reduction Targets	295	200

[1] Finalising the Sectoral Emissions Ceiling for the land-use, Land-use Change and Forestry (LULUCF) sector has been deferred for up to 18 months to allow for the completion of the Land-use Strategy
[2] Once LULUCF sector figures are finalised, total figures will be available.

The electricity sector is the third largest emitting sector in Ireland and the successful decarbonisation of this sector could lead to decarbonisation in other sectors, such as the electrification of transport and heating. The Annual 2023 Review states that the electricity sector has been set one of the smallest sectoral emission ceilings and the steepest decline in emissions of all sectors with emission ceilings of 40MtCO$_2$eq for the first carbon budget period (2021–2025) and 20MtCO$_2$eq for the second carbon budget period (2026–2030) (further detailed in Section 11.3.2.4 above). This equates to a headline target of a 75% reduction in emissions in the sector from 2018 levels by 2030, which will be achieved by

increasing the share of renewable electricity to 80%, encompassing 9GW of onshore wind capacity, at least 5GW of offshore wind capacity and 8GW of solar photovoltaic capacity, supported by a range of actions set out in the Climate Action Plan 2023.[6]

11.3.2.6 Climate Action Plan 2023

The Climate Action Plan 2023 (CAP 2023) was launched in December 2022. Following on from Climate Action Plans 2019 and 2021, CAP 2023 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.* CAP 2023 sets out indicative ranges of emissions reductions for each sector of the economy.

At the time of writing, the National Climate Action Plan 2024 was not published. It is expected to be published before the end of the 2023.

There have been Six Vital High Impact Sectors identified within CAP 2023 relating to the sectoral emission ceilings (Section 11.3.2.5 above) and these are as follows:

Powering Renewables – 75% Reduction in emissions by 2030

We will facilitate a large-scale deployment of renewables that will be critical to decarbonising the power sector as well as enabling the electrification of other technologies.

- *Accelerate the delivery of onshore wind, offshore wind, and solar.*
- *Dial up to 9 GW onshore wind, 8 GW solar, and at least 5 GW of offshore wind by 2030 (with 2 GW earmarked for green hydrogen production).*
- *Support at least 500 MW of local community-based renewable energy projects and increased levels of new micro-generation and small-scale generation.*
- *Phase out and end the use of coal and peat in electricity generation.*
- *New, dynamic Green Electricity Tariff will be developed by 2025 to incentivise people to use lower cost renewable electricity at times of high wind and solar generation.*

Achievement of the 75% reduction in emissions by 2030 and the decarbonisation of the grid in Ireland would assist in the achievement of the Electricity sectoral emission ceiling.

Building Better – 45% (Commercial/Public) and 40% (Residential) Reduction in Emissions by 2030

We will increase the energy efficiency of existing buildings, put in place policies to deliver zero-emissions new builds and continue to ramp up our retrofitting programme.

- *Ramp up retrofitting to 120,000 dwellings to BER B2 by 2025, jumping to 500,000 by 2030.*
- *Put heat pumps into 45,000 existing and 170,000 new dwellings by 2025, up to 400,000 existing and 280,000 new dwellings by 2030.*
- *Generation up to 0.8 TWh of district heating by 2025 and up to 2.5 TWh by 2030.*

[6] *Climate Action Plan 2023* <https://www.gov.ie/en/publication/7bd8c-climate-action-plan-2023/>

Achievement of the 45% (Commercial/Public) and 40% (Residential) reduction in emissions by 2030 would assist in the achievement of the Built Environment (Commercial/Residential) sectoral emission ceiling.

Turning Transport Around – 50% Reduction in Emissions by 2030

We will drive policies to reduce transport emissions by improving our town, cities and rural planning, and by adopting the Avoid-Shift-Improve approach: reducing or avoiding the need for travel, shifting to public transport, walking and cycling and improving the energy efficiency of vehicles.

- *Change the way we use our road space.*
- *Reduce the total distance driven across all car journeys by 20%.*
- *Walking, cycling and public transport to account for 50% of our journeys.*
- *Nearly 1 in 3 private cars will be an Electric Vehicle.*
- *Increase walking and cycling networks.*
- *70% of people in rural Ireland will have buses that provide at least 3 trips to the nearby town daily by 2030.*

Achievement of the 50% reduction in emissions relating to transport by 2030 would assist in the achievement of the Transport sectoral emission ceiling.

Making Family Farms More Sustainable – 25% Reduction in Emissions by 2030

We will support farmers to continue to produce world class, safe and nutritious food while also seeking to diversify income through tillage, energy generation and forestry.

- *Significantly reduce our use of chemical nitrogen as a fertilizer.*
- *Increase uptake of protected urea on grassland farms to 90-100%.*
- *Increase organic farming to up to 450,000 hectares, the area of tillage to up to 400,000 ha.*
- *Expand the indigenous biomethane sector through anaerobic digestion, reaching up to 5.7TWh of biomethane.*
- *Contribute to delivery of the land use targets for afforestation and reduced management intensity of organic soils.*

Achievement of a 25% reduction in emissions by 2030 in agriculture and farming practices would assist in the achievement of the Agriculture sectoral emission ceiling.

Greening Business and Enterprise – 35% Reduction in Emissions by 2030

We're changing how we produce, consume, and design our goods and services by breaking the link between fossil fuels and economic progress. Decarbonising industry and enterprise is key to Ireland's economy and future competitiveness.

- *Reduce clinker content in cement and substitute products with lower carbon content for construction materials, ensuring 35% reduction in emissions by 2030 (against 2018).*
- *Reduce fossil fuel use from 64% of final consumption (2021) to 45% by 2025 and further by 2030.*
- *Increase total share of heating to carbon neutral to 50-55% by 2025, up to 70-75% by 2030.*
- *Significantly grow the circular economy and bioeconomy.*

Achievement of a 35% reduction in emissions by 2030 in relation to Irish production and consumption would enable a more circular economy and assist in the achievement of the Industry and Other sectoral emission ceilings.

Changing Our Land-Use - Exact reduction target for this sector is yet to be determined.

The first phase of the land use review will tell us how we are using our land now. Then, we can map, with evidence, how it can be used most effectively to capture and store carbon and to produce better, greener food and energy.

- *Increase our annual afforestation rates to 8,000 hectares per annum from 2023 onwards.*
- *Rethink our Forestry Programme and Vision.*
- *Promote forest management initiatives in both public and private forests to increase carbon sinks and stores.*
- *Improve carbon sequestration of 450,000 ha of grasslands on mineral soils and reduce the management intensity of grasslands on 80,000 ha of drained organic soils.*
- *Rehabilitate 77,600 hectares of peatlands.*

By improving the manner in which Ireland utilises its land use, Ireland can achieve emission reductions and mitigate the ongoing climate and biodiversity crisis's. The LULUCF sectoral emission ceiling will be set after completion of the Land-use Strategy.

11.3.2.7 Greenhouse Gas Emissions Projections

In its approach to decarbonising, the EU has split greenhouse gas (GHG) emissions into two categories, the Emissions Trading System (ETS) and the non-ETS. 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 GHG emissions is achieved at EU-level[7].

Emissions from all other sectors, including agriculture, transport, buildings, and light industry are covered by the EU Effort Sharing Regulation (ERS[8]). This established binding annual GHG 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. 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[1].

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 2022–2040'*[9] was published in June 2023. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2030 set under the Effort Sharing Regulation (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 Irelands greenhouse gas emissions in different ways. The WEM scenario assumes that

[7] *Government of Ireland (2023) - Climate Action Plan 2023* https://www.gov.ie/en/publication/7bd8c-climate-action-plan-2023/
[8] *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)*
[9] *Irelands Greenhouse Gas Emissions Projections 2022-2040.* <https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-GHG-Projections-2022-2040_Finalv2.pdf>

no additional policies and measures, beyond those already in place by the end of 2020. 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 2023.

The EPA Emission Projections Update notes the following key trends:

- Ireland is not on track to meet the 51% emissions reduction target by 2030 (as compared to 2018 levels) – expected to achieve a total reduction of 29% under a WAM scenario
  - Will only achieve an 11% reduction under a WEM scenario
- Almost all sectors are projected to breach their sectoral emission ceiling (SEC) for 2025 and 2023 in both WAM and WEM scenarios
  - Only the residential sector will achieve their SEC
- Projected that Ireland could meet the original EU Effort Sharing Regulation target of 30% emissions reductions by 2030 (compared to 2005) – this goal has since been updated to a 42% reduction which will require full and rapid implementation of CAP 2023 measures and further measures to be implemented
- Energy sector emissions are projected to decrease by 50-60% between 2021-2030
  - Achievement of the 80% renewable energy target is expected
- Transport emissions are expected to decrease between 1-35% between 2021-2030
- Emissions from LULUCF are projected to increase over the period 2021-2030 as forestry reaches harvesting age
  - Planned policies for the sector are expected to reduce the extent of emissions increase.

11.3.3 Local Greenhouse Gas Emission and Climate Targets

11.3.3.1 Mayo County Council Local Authority Climate Action Plan

The Mayo County Council Local Area Climate Action Plan is currently being drafted; public consultation was completed in December 2023. The Mayo County Council Climate Action Plan Issues Paper[10] highlights the aims of Mayo County Council to deliver and enable climate action for a just transition to a low carbon and climate resilient future within the County. The Local Area Climate Action Plan for County Mayo will help address the mitigation of greenhouse gases, the implementation of climate change adaption measures, and will strengthen the alignment between national climate policy and the delivery of effective local climate action.

A Baseline Emissions Inventory[11] for County Mayo shows that overall, the GHG emissions generated from County Mayo equated to 2,631,000 tCO2eq in the baseline year, 2018. The top three emitting sectors within County Mayo in terms of total greenhouse gas emissions in the baseline year were agriculture, land use, land use change and forestry (LULUCF), and residential, producing 43%, 20%, and 14% of total emissions respectively. Mayo 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 2023 (Section 11.3.2.6).

The Local Area Climate Action Plan for County Mayo will assess climate risk relevant to Ireland and to County Mayo, this, plus the emissions baseline, will inform climate objectives and actions that will be

[10] *Mayo County Council Climate Action Plan Pre-Draft Public Engagement Issues Paper* <https://www.mayo.ie/getmedia/751e3cdd-eb17-4d13-a5c0-e126da9dc4a4/Final-MCC-CAP-Issues-paper.pdf>
[11] *Baseline Emissions Inventory Mayo County Council.* <https://www.mayo.ie/getmedia/21dbdaef-9995-4dc6-bda4-1d916afeef93/Final_County_Mayo_BEI_2023.pdf>

undertaken by Mayo County Council to assist in the achievement of national and international climate targets.

The Mayo County Development Plan 2022-2028[12] sets out the overall strategy for the proper planning and sustainable development of the County over a 6-year period. The Development Plan includes numerous objectives on sustainability and climate within, as well as a Renewable Strategy.

11.4 Climate and Weather in the Existing Environment

Ireland has a temperate, oceanic climate, resulting in mild winters and cool summers. The Met Éireann weather station at Belmullet which is located approximately 52.8 kilometres to the west of the site, is the nearest weather and climate monitoring station to the Proposed Development site that has meteorological data recorded for the 30-year period from 1991-2020. Meteorological data recorded at Belmullet over the 30-year period from 1991-2020 is shown in Table 11-5 below. The wettest months are January and November, with May and June being the driest. July is the warmest month with an average temperature of 14.9° Celsius.

Recent monthly meteorological data recorded at Belmullet, Co Mayo, located approximately 52.8 kilometres west of the site, from January 2020 to January 2023 is available at: https://www.met.ie/climate/available-data/monthly-data. February 2020 was the wettest month in this time period, with 241.9mm of rainfall recorded, while April 2020 was the driest month with 23.6mm of rainfall. July 2021 was the warmest month in this time period, with a mean monthly temperature of 16.3° Celsius. January 2021 was the coldest month with a mean monthly temperature of 5.5° Celsius.

[12] *Mayo County Development Plan 2022-2028.* <https://www.mayo.ie/getmedia/c656984a-b1fc-455e-b3ce-cccf10975b3f/Vol-1-Mayo-CDP-22-28-Final.pdf >

Table 11-5 Data from Met Éireann Weather Station at Belmullet, 1991 to 2020

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
TEMPERATURE (degrees Celsius)													
Mean daily max	8.9	9.2	10.5	12.2	14.6	16.3	17.6	17.7	16.5	13.8	11	9.2	13.1
Mean daily min	3.9	3.9	4.9	6	8.2	10.6	12.3	12.4	11	8.7	6.3	4.6	7.7
Mean temperature	6.4	6.5	7.7	9.1	11.4	13.5	14.9	15	13.7	11.2	8.7	6.9	10.4
Absolute max.	13.7	15.6	22.2	23.9	26.3	27.2	29.9	27.7	25	21	16.2	14.6	29.9
Absolute Min.	-5.9	-4.1	-4.9	-2.1	0.5	3.5	5.6	5.2	3.1	-1.7	-4.6	-7.8	-7.8
Mean No. of Days with Air Frost	3.1	2.9	1.2	0.3	0	0	0	0	0	0	0.5	2.4	10.4
Mean No. of Days with Ground Frost	9.4	8.8	6.7	4	1.5	0	0	0	0	1.4	4.5	8.7	45.1
RELATIVE HUMIDITY (%)													
Mean at 0900UTC	86.6	86.5	84.1	80.7	78.7	80.7	83.9	83.9	84.4	85.4	85.9	86.6	83.9
Mean at 1500UTC	82.4	80	76.2	73.5	72.8	76.2	78.5	78.1	77.5	79.2	82.3	83.9	78.4
SUNSHINE (Hours)													
Mean daily duration	1.4	2.4	3.5	5.3	6.3	5.6	4.4	4.6	4	3	1.7	1.2	3.6
Greatest daily duration	8.3	10	11.9	14.1	15.5	15.9	15.5	13.9	12.6	11	8.6	7.2	15.9
Mean no. of days with no sun	9.5	6	5.3	2.5	2	2.4	2.7	2.8	3.3	5.4	7.7	10.4	60
RAINFALL (mm)													
Mean monthly total	136.9	109.9	90.6	74	70.8	73	85.9	100.5	102.6	131.2	139.6	126.6	1241.6
Greatest daily total	44.26	31.3	29	25.9	36.3	38.9	33.2	49.5	57	40	43	34.4	57
Mean num. of days with >= 0.2mm	24.4	21.7	21.5	18.8	18.1	17.8	21.1	21.2	20.8	23.2	24.7	24.2	257.5
Mean num. of days with >= 1.0mm	20.1	17.8	16.7	13.8	13.2	12.4	14.9	15.8	15.8	18.7	21	20.7	200.9
Mean num. of days with >= 5.0mm	10.2	8.8	6.7	5.3	4.8	4.8	6.1	6.6	6.7	9.1	10.1	9.9	89.1
WIND (knots)													
Mean monthly speed	14.8	14.2	13.2	12.1	11.6	11.2	10.7	10.9	11.7	12.5	13	14.2	12.5
Max. gust	94	82	74	75	78	63	62	56	73	71	80	93	94
Max. mean 10-minute speed	54	53	50	44	46	45	37	40	50	49	47	59	59
Mean num. of days with gales	5.5	4.2	3.3	1.1	1	0.4	0.3	0.8	2.3	3.6	3.4	4.5	30.5

11.5 Calculating Carbon Losses and Savings from the Proposed Development

11.5.1 Background

In addition to the combustion of fossil fuels, greenhouse gases are also released through natural processes such as the decomposition of organic material (which is composed of carbon). Bogs and peatlands are known to store large amounts of carbon. Due to the waterlogged nature of these habitats, stored carbon is not broken down and released into the atmosphere. The Macauley Institute Carbon Calculator Tool, detailed below, provides background on the impacts of constructing wind farms on bog and peat habitats. Wind farms constructed on these 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 Development site is situated on agricultural land and peatland, covered by coniferous forestry and smaller areas of transitional woodland scrub. Note, in line with the Forest Service's published policy 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. For this reason, the carbon balance between the use of renewable energy and the loss of carbon stored in the peat will be assessed in this section of the EIAR.

CO_2 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 CO_2 when the material decomposes. Organic material acts as a store of carbon. Peatland habitats have a significant capacity to store organic carbon. The vegetation on a peat bog slowly absorbs CO_2 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 CO_2. It is essential therefore that any wind farm development in a peatland area saves more CO_2 than is released.

11.5.2 Methodology for Calculating Losses

A methodology 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 and is currently available as Version 1.7.0 which was last updated in 2022. 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 any more detailed methods.

Although the loss of carbon fixing potential from plants on peat land is not substantial, it is nonetheless calculated for areas from which peat is removed and the areas affected by drainage. This calculation can take account of the annual gains due to the carbon fixing potential of the peat land and the time required for any habitat restoration. The carbon sequestered in the peat itself represents a much more substantial potential source of carbon loss. During wind farm construction, carbon is lost as a result of peat excavation and peat drainage. The amount of carbon lost is estimated using default values from the Intergovernmental Panel on Climate Change (IPCC, 1997) as well as by more site-specific equations derived from the scientific literature and updated emission factors. Carbon gains due to habitat improvement and site restoration are calculated in a similar fashion.

Peatlands are essentially unbalanced systems. When flooded, peat soils emit less carbon dioxide but more methane than when drained. In waterlogged soils, carbon dioxide 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, carbon emissions usually exceed plant fixation, so the net exchange of carbon with the atmosphere is positive. In order to calculate the carbon 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 the 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 peat, 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 Development, the model has been prepared on the basis that restoration will not occur upon decommissioning of the wind farm (i.e., site roads and hardstands will be left in situ) however, as detailed in Section 4.11, refer to Appendix 4-7 of the EIAR for details in relation to decommissioning.

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 Development, 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.

Clear-felling of existing forestry surrounding turbine locations is necessary to allow for the construction of the Proposed Development footprint and the erection of the wind turbines, and to protect local bat populations. Forestry may be felled earlier than originally planned due to the wind farm development, so limiting the nature and longevity of the resulting timber produced. If a forestry plantation was due to be felled with no plan to replant, the effect of the land use change is not attributable to the wind farm development and is omitted from the calculation. If, however, the forestry is felled for the development as is the case for this project, the effects are judged to be attributable to the wind farm development. Carbon losses as a result of felling are calculated from the area to be felled the average carbon sequestered annually, and the lifetime of the wind farm. Alterations in soil carbon levels following felling are calculated using the equations for drainage and site restoration already described.

The outputs of the Macauley Institute web-based carbon calculator are included in Appendix 11-1 of this EIAR, '*Carbon Calculations*'.

In addition to the Macauley Institute methodology described above, where possible, carbon emissions or losses associated with embodied carbon of materials used in the construction, operational and decommissioning phase of the Proposed Development have been identified. Embodied carbon refers to 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.[13]

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 site infrastructure and the grid connection are considered using the Transport Infrastructure Ireland (TII) Carbon Tool (TII 2022)[14]. 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 15.1.4 in Chapter 15 of this EIAR outlines traffic generation numbers relative to quantum of materials required for the construction of the Proposed Development, the details of which have been utilised to determine the emissions associated with these activities and are included in Appendix 11-1.

11.5.2.1 Carbon Losses and Savings Calculations

11.5.2.1.1 *Carbon Losses*

The Scottish Government online carbon calculator was used to assess the impacts of the Proposed Development in terms of potential carbon losses and savings taking into account drainage, habitat improvement, forestry felling and site restoration. The online calculator is pre-loaded with information specific to the CO_2 emissions from the United Kingdom's electricity generation plant, which is used to calculate emissions savings from proposed wind farm projects in the UK. Similar data to that used in the worksheet to calculate the CO_2 emissions from the UK electricity generation plant, was not allowable for input for the Irish electricity generation plant, and so the CO_2 emissions savings from the Proposed Development have been calculated separately from the online carbon calculator as set out in Section 11.5.2.1.2 below.

In relation to embodied carbon and associated transport movements of all other ancillary elements of the Proposed Development, the TII Carbon Tool has been utilised to assess the impacts of the Proposed Development in terms of potential carbon losses, and in particular construction phase transport emissions associated with the movement of aggregate material and ancillary elements to the site; this includes for infrastructure relating to the grid connection.

A copy of the outputs is provided as Appendix 11-1 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 CO_2 losses due to the Proposed Development are summarised in Table 11-6.

Table 11-6 CO_2 Losses from the Proposed Development

Origin of Losses	CO_2 Losses (tonnes CO_2 equivalent)	
	Expected	Maximum
Losses due to turbine life (e.g., manufacture, construction, decommissioning)	174,715	178,826

[13] *Irish green Building Council – What is embodied carbon?* <https://www.igbc.ie/what-is-embodied-carbon/>
[14] *Transport Infrastructure Ireland Carbon Tool for Road and Light Rail Projects: User Guidance Document* https://www.tiipublications.ie/library/GE-ENV-01106-01.pdf

Losses due to backup	131,127	153,189
Losses from reduced carbon fixing potential	3,086	6,005
Losses from soil organic matter and due to leaching of dissolved and particulate organic carbon (CO_2 loss from removed and drained peat)	45,910	114,880
Losses associated to forestry felling	53,592	63,493
Losses associated with embodied carbon in construction materials (including aggregates and ancillary infrastructure components associated with the Proposed Development)	4,252	4,252
Losses associated with traffic and transport movements (for all elements of the Proposed Development)	209	209
Total	**412,891**	**520,854**

The worksheet models and online tools calculate that the Proposed Development will give rise to 412,891 tonnes of CO_2 equivalent losses over its 35-year life. Of this total figure, the proposed wind turbines directly account for 174,715 tonnes, or 42%. Losses due to backup account for 131,127 tonnes, or 32%. Losses from reduced carbon fixing potential accounts for 1% or 3,086 tonnes. Losses from soil organic matter, i.e., CO_2 loss from removed and drained peat, will equate to 45,910 tonnes, or 11%. Losses due to forestry felling account for 53,592 tonnes or 13%. Losses due to embodied carbon accounts for 4,252 tonnes or 1% and losses due to construction phase transport emissions accounts for 0.05% or 209 tonnes.

The figure of 3,086 tonnes of CO_2 arising from ground activities associated with the Proposed Development is calculated based on the entire development footprint at the Proposed Development being "Acid Bog", as this is one of only two choices the model allows (the other being Fen). The habitat that will be impacted by the Proposed Development is predominantly comprised of commercial forestry, underlain by blanket peat, rather than the acid bog assumed by the model that gives rise to the 3,086 tonnes and therefore the actual CO_2 losses are expected to be lower than this value.

The figure of 4,252 tonnes of CO_2 arising from the embodied carbon of construction materials associated with the Proposed Development is calculated based the types of materials available in the TII Carbon tool such as, concrete, steel, cement and granular fill. The figure of 209 tonnes of CO_2 arising from transport movements associated with construction activities associated with the Proposed Development is calculated based on the assumption that each HGV or LGV will be carrying material at its full capacity, along with 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 11-1.

The values discussed above are based on the assumption that the hydrology of the Proposed Development and habitats within the Proposed Development site are not restored on decommissioning of the Proposed Development after its expected 35-year useful life. As detailed in the Decommissioning Plan, Appendix 4-7, 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 its removal will be the least preferred options in terms of having potential effects on the environment. The associated foundations

will be reinstated and revegetated with an appropriate seed mix. The electrical and fibre optic cabling that connects each turbine to the proposed onsite 110kV electrical substation will be removed from the cable ducting. The cable ducting will be left in-situ as it is considered the most environmentally prudent option, avoiding unnecessary excavation and soil disturbance for an underground element that is not visible with no environmental impact associated with leaving the ducting in-situ. Taking into account the proposals incorporated in the Decommissioning Plan, the actual CO_2 losses are expected to be lower than the values detailed in Table 11-6.

11.5.2.1.2 Carbon Savings

According to the model described above, the Proposed Development will give rise to total losses of 412,891 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:

$$CO_2 \text{ (in tonnes)} = \frac{(A \times B \times C \times D)}{1000}$$

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 Development is assumed to be 198 MW (based on 22 No. 9 MW turbines).

A load factor of 0.35 (or 35%) has been used for the Proposed Development[15].

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) December 2022 report, '*Energy in Ireland.*' The provisional emission factor for electricity generated in Ireland in 2022 was 296 g CO_2/kWh.

The calculation for carbon savings is therefore as follows:

$$CO_2 \text{ (in tonnes)} = \frac{(198 \times 0.35 \times 8{,}760 \times 296)}{1000}$$

$$= 179{,}692 \text{ tonnes per annum}$$

Based on this calculation, **179,692** tonnes of carbon dioxide will be displaced per annum from the largely carbon-based traditional energy mix by the Proposed Development. Over the proposed 35-year lifetime of the development, therefore, **6,289,220** tonnes of carbon dioxide will be displaced from traditional carbon-based electricity generation.

[15] *Eirgrid, 2022 Enduring Connection Policy 2.2 Constraints Report for Solar and Wind* ECP-2-2-Solar-and-Wind-Constraints-Report-Area-B-v1.0.pdf (eirgridgroup.com)
The Proposed Development is located within the B wind region for Ireland with an associated 2020 capacity factor of 35%.

As noted previously areas cleared of forestry for the Proposed Development will be replaced by replanting at alternatives sites. A total of 116 hectares of new forestry will be replanted at alternative sites to compensate the loss of forestry at the development site. Given that losses due to felling forestry account for 53,592 tonnes of CO_2, it has been assumed for the purposes of this calculation that the same quantity of CO_2 can be saved by replanting forestry at alternative sites.

Based on the Scottish Government carbon calculator as presented above in Section 11.5.2.1.1, 412,891 tonnes of CO_2 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 Development. This represents **7%** of the total amount of carbon dioxide emissions that will be offset by the Proposed Development. The 412,891 tonnes of CO_2 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 Development will be offset by the Proposed Development in approximately **28** months of operation.

11.6 Likely Significant Effects and Associated Mitigation Measures

11.6.1 'Do-Nothing' Effect

If the Proposed Development were not to proceed, the opportunity to further significantly reduce emissions of greenhouse gas emissions, including carbon dioxide (CO_2), oxides of nitrogen (NO_x), and sulphur dioxide (SO_2) from fossil fuels to the atmosphere would be lost. The opportunity to contribute to Ireland's commitments under the Kyoto Protocol and EU law would also be lost. This would be a long-term slight negative effect.

11.6.2 Construction Phase

11.6.2.1.1 *Greenhouse Gas Emissions*

Proposed Development Infrastructure

The construction of turbines, site roads and other onsite infrastructure (as outlined in Chapter 4 of this EIAR) will require the removal and reinstatement of peat habitat, tree felling, construction materials (such as cement), and the operation of vehicles and plant at the Proposed Development. Greenhouse gas emissions, e.g., carbon dioxide (CO_2), carbon monoxide and nitrogen oxides associated with the removal and reinstatement of peat habitat, tree felling, production of construction materials, and operation of vehicles and plant will arise as a result of the construction activities. This potential impact will be a short-term moderate effect, 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 impacts 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 Development, which has ensured the utilisation of as much of the existing roads within the Proposed Development as possible to gain access to the proposed turbine locations and minimise the construction of additional roads. This potential impact will be long-term and moderate only, given the quantity of greenhouse gases that will be emitted to the atmosphere.

Transport to Site

The transport of turbines and construction materials to the site, which will occur on specified routes only (see Section 4.4 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 and slight only, given the quantity of greenhouse gases that will be emitted, and will be restricted to the duration of the construction phase. Mitigation measures to reduce this impact are presented below.

Waste Disposal

Construction waste will arise from the Proposed Development mainly from excavation and unavoidable construction waste including material surpluses, damaged materials and packaging waste. This potential impact will be short-term and slight only, 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. 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

- 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.
- The majority of aggregate materials for the construction of the Proposed Development will be obtained from the borrow pits on site. This will significantly reduce the number of delivery vehicles accessing the site, thereby reducing the amount of emissions associated with vehicle movements.
- The Construction and Environmental Management Plan (CEMP) (Appendix 4-3) includes a Waste Management Plant (WMP) which outlines the best practice procedures that will occur during the construction phase relating to waste material.
    - Section 4.3.10.7 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 Development site to reduce the amount of emissions associated with vehicle movements.
- Waste associated with the construction of the underground electrical cabling route will be either brought directly to a licensed MRF or brought back to the Primary Construction Compound on-site, whichever is closest to the waste generation location in order to reduce vehicle movements.

Residual Effects

Following implementation of the mitigation measures above, residual impacts of greenhouse gas emissions arising from the construction phase of the Proposed Development will have a short-term imperceptible negative effect and will be restricted to duration of the construction phase. 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.

When considering these greenhouse gas emissions within the context of the national Electricity Sector Emissions Ceilings detailed in Section 11.3.2.4, Carbon Budget 1 (2021-2025) has an Electricity Sector budget of 40 MtCO2eq. and Carbon Budget 2 (2026-2030) has an Electricity Sector budget of 20 MtCO2eq for large-scale deployment of renewables. As detailed in Section 11.5.2.1.2, the Proposed Development will displace carbon dioxide from fossil fuel-based electricity generation, over its proposed 35-year operational lifespan. Therefore, while there will be greenhouse gas emissions associated with the construction of the Proposed Development, this will take place under the Electricity

sector emissions ceiling and will be offset by the operation of the Proposed Development within its operational life.

Significance of Effects

Based on the assessment above there will be no significant effects.

11.6.3 Operational Phase

11.6.3.1 Greenhouse Gas Emissions

The Proposed Development will generate electricity from a renewable source. As detailed in Section 11.5.2.1.2 above, the Proposed Development will offset greenhouse gas emissions associated with fossil fuel-based electricity generation, over the proposed 35-year lifespan of the Proposed Development. For the purposes of this EIAR, a rated output of 9MW has been chosen to calculate the power output of the Proposed Development, which would result in an estimated installed capacity of 198MW, displacing approximately 179,692 tonnes of carbon dioxide per annum from traditional carbon-based electricity generation. This will have a long-term significant positive effect on climate.

Some potential long-term slight negative impacts that may occur during the operational phase of the Proposed Development are the release of carbon dioxide to the atmosphere due to maintenance and monitoring activities, and the removal of carbon fixing vegetation and habitat, peat reinstatement and associated drainage.

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.
- As detailed in Appendix 6-4, a Biodiversity Management and Enhancement Plan for the Proposed Development has identified enhancement activities such as removal of forestry, drain blocking, and removal of rhododendron, rewetting of existing cutover peat habitat and restoration of wetland habitats.

Residual Effect

Following implementation of the biodiversity enhancement outlined above, the loss of carbon fixing vegetation over the lifetime of the Proposed Development will be partially offset by the biodiversity enhancement plan and using the precautionary principle, will have a potential long-term imperceptible negative effect on Climate. Furthermore, the Proposed Development will displace carbon dioxide from fossil fuel-based electricity generation, over its proposed 35-year operational lifespan. Therefore, while there will be greenhouse gas emissions associated with the operation of the Proposed Development, this will be offset by the operation of the Proposed Development within its operational life.

Long-term moderate positive effect on Climate as a result of reduced greenhouse gas emissions.

Significance of Effects

Based on the assessment above there will be no significant effects.

11.6.4 Decommissioning Phase

The wind turbines proposed as part of the Proposed Development are expected to have a lifespan of approximately 35 years. Following the end of the operational life of the wind farm, the wind turbines may be retained and the operational life extended or replaced with a new set of turbines, subject to planning permission being obtained. In the event that neither of the above options are implemented, the Proposed Development will be decommissioned fully as agreed with the Planning Authority. The grid connection will remain in place as it will be under the control of ESB and will form a permanent part of the national electricity grid.

The works required during the decommissioning phase are described in Section 4.11 in Chapter 4: Description of the Proposed Development. Any impact and consequential effect that occurs during the decommissioning phase are similar to that which occur during the construction phase, be it of less impact. The mitigation measures prescribed for the construction phase of the Proposed Development will be implemented during the decommissioning phase thereby minimising any potential impacts.

A Decommissioning Plan is included as Appendix 4-7 of this EIAR, the detail of which will be agreed with the relevant planning authority prior to any decommissioning. The potential for effects during the decommissioning phase of the Proposed Development has been fully assessed in the EIAR.

11.7 Cumulative Assessment

Potential cumulative effects on air quality and climate between the Proposed Development and other permitted or proposed projects and plans in the area, (wind energy or otherwise), as set out in Section 2.8 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 2.8 of this EIAR.

The nature of the Proposed Development is such that, once operational, it will have a long-term, moderate, positive impact on climate.

During the construction phase of the Proposed Development and other permitted or proposed projects and plans in the area as set out in Section 2.8 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 cement), 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 emission 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. However, as noted above, the Proposed Development will offset the 412,891 tonnes of CO_2 associated with the construction and operational phase that will be lost to the atmosphere in approximately 28 months of operation (Section 11.5.2.1).

When considering these greenhouse gas emissions within the context of the Electricity Sector Emissions Ceilings detailed in Section 11.3.2.4, Carbon Budget 1 (2021-2025) has an Electricity Sector budget of 40 MtCO2eq and Carbon Budget 2 (2026-2030) has an Electricity Sector budget of 20 MtCO2eq for large-scale deployment of renewables. As detailed in Section 11.5.2.1.2, the Proposed Development will displace carbon dioxide from fossil fuel-based electricity generation, over the proposed 35-year lifespan of the Proposed Development. Therefore, while there will be greenhouse gas emissions associated with the construction of the Proposed Development, this will take place under the Electricity sector emissions ceiling and will be offset by the operation of the Proposed Development within its operational life. Thus, there will be no cumulative effects arising on climate from the Proposed Development and other permitted or Proposed Developments and plans in the area as set out in Section 2.8 in Chapter 2 of this EIAR