

## 10. AIR AND CLIMATE

### 10.1 Air Quality

#### 10.1.1 Introduction

This chapter identifies, describes and assesses the potential significant direct and indirect effects on air quality and climate arising from the construction, operation and decommissioning of the proposed development.

The proposed development site is sited on the Clongawny and Drinagh Bogs approximately 2km south of the village of Cloghan in County Offaly. The townlands in which the proposed development is located, including the proposed 110kV substation and grid connection route, are listed in Table 1-1 in Chapter 1 of this EIAR.

The land uses and types within the proposed development site are a mixture of bare cutover and cutaway peat, re-vegetation of bare peat, commercial forestry, telecommunications (a 30m Mast) and wind measurement (a single 100m anemometry mast on Clongawny Bog). There are also several Bord na Móna rail lines that pass through the bogs facilitating the transportation of milled peat to Derrinlough Briquette Factory which is located in the most western part of Drinagh bog.

The surrounding land uses, and types comprise a mixture of forestry, agricultural land, a mosaic of active peat extraction, cutover and cutaway peatland, amenity (e.g. Lough Boora Parklands) and wind energy. The operational Meenwaun Wind Farm is located adjacent to the southwestern boundary of the proposed development site.

Due to the non-industrial nature of the proposed development and the general character of the surrounding environment, air quality sampling was deemed to be unnecessary for this EIAR. Although the site is located close to the peat-powered West Offaly Power Station at Shannonbridge, it is expected that air quality in the existing environment locally is good. The West Offaly Power Station is operated by the ESB under IPC Licence No. P0611-02 issued by the Environmental Protection Agency (EPA); therefore, all emissions from this site are strictly controlled and monitored. This power station is scheduled to close in 2020.

The production of energy from wind turbines has no direct emissions as is expected from fossil fuel-based power stations. Harnessing more energy by means of wind farms will reduce dependency on fossil fuels, thereby resulting in a reduction in harmful emissions that can be damaging to human health and the environment. Some minor short term or temporary indirect emissions associated with the construction of the wind farm include vehicular and dust emissions. Emissions from the construction, operation and decommissioning phases of the project are addressed in Section 10.1.5.

##### 10.1.1.1 Relevant Guidance

The air quality and climate section of this EIAR is carried out in accordance with the 'EIA Directive' as amended by Directive 2014/52/EU and having regard, where relevant, to guidance listed in Section 1.8.1 of Chapter 1: Introduction.

##### 10.1.1.2 Statement of Authority

This chapter of the EIAR was completed by Eoin McCarthy and Michael Watson. Eoin is a Senior Environmental Scientist with McCarthy O'Sullivan Ltd. with over 8 years of experience in private consultancy and has been involved in the preparation of Air and Climate chapters for EIARs for over twenty wind energy projects. Eoin holds B.Sc. (Hons) in Environmental Science from NUI, Galway.

Michael Watson is Project Director and head of the Environment Team in MKO. Michael has over 18 years' experience in the environmental sector. Following the completion of his Master's Degree in Environmental Resource Management, Geography, from National University of Ireland, Maynooth he worked for the Geological Survey of Ireland. Between them, they have completed Air and Climate EIAR chapters for over twenty wind energy projects.

## 10.1.2 Air Quality Standards

In 1996, the Air Quality Framework Directive (96/62/EC) was published. This Directive was transposed into Irish law by the Environmental Protection Agency Act 1992 (Ambient Air Quality Assessment and Management) Regulations 1999. The Directive was followed by four Daughter Directives, which set out limit values for specific pollutants:

- The first Daughter Directive (1999/30/EC) addresses sulphur dioxide, oxides of nitrogen, particulate matter and lead.
- The second Daughter Directive (2000/69/EC) addresses carbon monoxide and benzene. The first two Daughter Directives were transposed into Irish law by the Air Quality Standards Regulations 2002 (SI No. 271 of 2002).
- The third Daughter Directive, Council Directive (2002/3/EC) relating to ozone was published in 2002 and was transposed into Irish law by the Ozone in Ambient Air Regulations 2004 (SI No. 53 of 2004).
- The fourth Daughter Directive, published in 2007, relates to polyaromatic hydrocarbons (PAHs), arsenic, nickel, cadmium and mercury in ambient air and was transposed into Irish law by the Arsenic, Cadmium, Mercury, Nickel and Polycyclic Aromatic Hydrocarbons in Ambient Air Regulations, 2009 (S.I. No. 58 of 2009).

The Air Quality Framework Directive and the first three Daughter Directives have been replaced by the Clean Air for Europe (CAFE) Directive (Directive 2008/50/EC on ambient air quality), which encompasses the following elements:

- The merging of most of the existing legislation into a single Directive (except for the Fourth Daughter Directive) with no change to existing air quality objectives.
- New air quality objectives for PM<sub>2.5</sub> (fine particles) including the limit value and exposure concentration reduction target.
- The possibility to discount natural sources of pollution when assessing compliance against limit values.
- The possibility for time extensions of three years (for particulate matter PM<sub>10</sub>) or up to five years (nitrogen dioxide, benzene) for complying with limit values, based on conditions and the assessment by the European Commission.

Table 10.1 below sets out the limit values of the CAFE Directive, as derived from the Air Quality Framework Daughter Directives. Limit values are presented in micrograms per cubic metre ( $\mu\text{g}/\text{m}^3$ ) and parts per billion (ppb). The notation PM<sub>10</sub> is used to describe particulate matter or particles of ten micrometres or less in aerodynamic diameter. PM<sub>2.5</sub> represents particles measuring less than 2.5 micrometres in aerodynamic diameter.

The CAFE Directive was transposed into Irish legislation by the Air Quality Standards Regulations 2011 (S.I. No. 180 of 2011). These Regulations supersede the Air Quality Standards Regulations 2002 (S.I. No. 271 of 2002), the Ozone in Ambient Air Regulations 2004 (S.I. No. 53 of 2004) and the Ambient Air Quality Assessment and Management Regulations 1999 (S.I. No. 33 of 1999).

Table 10.1 Limit values of Directive 2008/50/EC, 1999/30/EC and 2000/69/EC (Source: <https://www.epa.ie/air/quality/standards/>)

Pollutant	Limit Value Objective	Averaging Period	Limit Value ( $\mu\text{g}/\text{m}^3$ )	Limit Value (ppb)	Basis of Application of Limit Value	Attainment Date
Sulphur dioxide ( $\text{SO}_2$ )	Protection of Human Health	1 hour	350	132	Not to be exceeded more than 24 times in a calendar year	1st Jan 2005
Sulphur dioxide ( $\text{SO}_2$ )	Protection of human health	24 hours	125	47	Not to be exceeded more than 3 times in a calendar year	1st Jan 2005
Sulphur dioxide ( $\text{SO}_2$ )	Protection of vegetation	Calendar year	20	7.5	Annual mean	19th Jul 2001
Sulphur dioxide ( $\text{SO}_2$ )	Protection of vegetation	1st Oct to 31st Mar	20	7.5	Winter mean	19th Jul 2001
Nitrogen dioxide ( $\text{NO}_2$ )	Protection of human health	1 hour	200	105	Not to be exceeded more than 18 times in a calendar year	1st Jan 2010
Nitrogen dioxide ( $\text{NO}_2$ )	Protection of human health	Calendar year	40	21	Annual mean	1st Jan 2010
Nitrogen monoxide (NO) and nitrogen dioxide ( $\text{NO}_2$ )	Protection of ecosystems	Calendar year	30	16	Annual mean	19th Jul 2001
Particulate matter 10 ( $\text{PM}_{10}$ )	Protection of human health	24 hours	50	-	Not to be exceeded more than 35 times in a calendar year	1st Jan 2005

Pollutant	Limit Value Objective	Averaging Period	Limit Value ( $\mu\text{g}/\text{m}^3$ )	Limit Value (ppb)	Basis of Application of Limit Value	Attainment Date
Particulate matter 2.5 ( $\text{PM}_{2.5}$ )	Protection of human health	Calendar year	40	-	Annual mean	1st Jan 2005
Particulate matter 2.5 ( $\text{PM}_{2.5}$ ) Stage 1	Protection of human health	Calendar year	25	-	Annual mean	1st Jan 2015
Particulate matter 2.5 ( $\text{PM}_{2.5}$ ) Stage 2	Protection of human health	Calendar year	20	-	Annual mean	1st Jan 2020
Lead (Pb)	Protection of human health	Calendar year	0.5	-	Annual mean	1st Jan 2005
Carbon Monoxide (CO)	Protection of human health	8 hours	10,000	8,620	-	1st Jan 2005
Benzene ( $\text{C}_6\text{H}_6$ )	Protection of human health	Calendar Year	5	1.5	-	1st Jan 2010

The Ozone Daughter Directive 2002/3/EC is different from the other Daughter Directives in that it sets target values and long-term objectives for ozone rather than limit values. Table 10.2 presents the limit and target values for ozone.

Table 10.2 Target values for Ozone Defined in Directive 2008/50/EC

Objective	Parameter	Target Value for 2010	Target Value for 2020
Protection of human health	Maximum daily 8-hour mean	120 $\text{mg}/\text{m}^3$ not to be exceeded more than 25 days per calendar year averaged over 3 years	120 $\text{mg}/\text{m}^3$
Protection of vegetation	AOT40* calculated from 1-hour values from May to July	18,000 $\text{mg}/\text{m}^3\cdot\text{h}$ averaged over 5 years	6,000 $\text{mg}/\text{m}^3\cdot\text{h}$
Information Threshold	1-hour average	180 $\text{mg}/\text{m}^3$	-
Alert Threshold	1-hour average	240 $\text{mg}/\text{m}^3$	-

\*The sum of the differences between hourly ozone concentration and 40 ppb for each hour when the concentration exceeds 40 ppb during a relevant growing season, e.g. for forest and crops.

### 10.1.2.1 Air Quality and Health

The EPA report ‘*Air Quality in Ireland 2018*’ noted that in Ireland, the premature deaths attributable to poor air quality are estimated at 1,180 people. A more recent European Environmental Agency (EEA) Report, ‘*Air Quality in Europe – 2019 Report*’ highlights the negative effects of air pollution on human health. The report assessed that poor air quality accounted for premature deaths of approximately 412,000 people in Europe in 2016, with regards to deaths relating to PM<sub>2.5</sub>. The estimated impacts on the population in Europe of exposure to NO<sub>2</sub> and O<sub>3</sub> concentrations in 2016 were around 71,000 and 15,100 premature deaths per year, respectively. From this, 1,100 Irish deaths were attributable to fine particulate matter (PM<sub>2.5</sub>), 50 Irish deaths were attributable to nitrogen oxides (NO<sub>2</sub>) and 30 Irish deaths were attributable to Ozone (O<sub>3</sub>) (Source: *Air Quality in Europe – 2019 Report*, EEA, 2019). These emissions, along with others including sulphur oxides (SO<sub>x</sub>) are produced during fossil fuel-based electricity generation in various amounts, depending on the fuel and technology used.

### 10.1.3 Air Quality Zones

The Environmental Protection Agency (EPA) has designated four Air Quality Zones for Ireland:

- Zone A: Dublin City and environs
- Zone B: Cork City and environs
- Zone C: 16 urban areas with population greater than 15,000
- Zone D: Remainder of the country.

These zones were defined to meet the criteria for air quality monitoring, assessment and management described in the Framework Directive and Daughter Directives. The site of the proposed development lies within Zone D, which represents rural areas located away from large population centres.

### 10.1.4 Existing Environment

The EPA publishes Air Monitoring Station Reports for monitoring locations in all four Air Quality Zones. The ambient air quality monitoring carried out closest to the proposed development site is Ferbane, Co. Offaly, located approximately 9 kilometres north-northeast of the proposed development. EPA air quality data is available for Ferbane in the report ‘*Ambient Air Monitoring at Ferbane, Co. Offaly 4th October 2006 to 29th March 2007*’, as detailed below. This monitoring location lies within Zone D.

#### 10.1.4.1 Sulphur Dioxide (SO<sub>2</sub>)

Sulphur dioxide data for the 2006/2007 monitoring period at Ferbane is presented in Table 10.3. Neither the hourly limit value nor lower assessment threshold set out in the CAFE Directive were exceeded during the monitoring period.

Table 10.3 Sulphur Dioxide Data Ferbane 2006/2007

Parameter	Measurement
No. of hours	4,210
No. of measured values	4,103
Percentage Coverage	98.1%
Maximum hourly value	15.1 µg/m <sup>3</sup>
99.7 percentile for hourly values	13.5 µg/m <sup>3</sup>

Parameter	Measurement
Mean hourly value	3.2 $\mu\text{g}/\text{m}^3$
Maximum 24-hour mean	3.0 $\mu\text{g}/\text{m}^3$
98 percentile for 24-hour mean	2.9 $\mu\text{g}/\text{m}^3$

#### 10.1.4.2 Particulate Matter (PM<sub>10</sub>)

Particulate matter (PM<sub>10</sub>) data for the 2006/2007 monitoring period in Ferbane is presented in Table 10.4. The 24-hour limit value for the protection of human health (50  $\mu\text{g}/\text{m}^3$ ) was exceeded 35 times during the measurement period. The upper assessment threshold was exceeded on 19 days and the lower assessment threshold was exceeded on 56 days. The CAFE Directive stipulates that these assessment thresholds should not be exceeded more than 35 times in a calendar year. The mean of the daily values during the measurement period is below the annual limit value for the protection of human health (40  $\mu\text{g}/\text{m}^3$ ).

Table 10.4 Particulate Matter (PM<sub>10</sub>) Data Ferbane 2006/2007

Parameter	Measurement
No. of days	175
No. of measured values	175
Percentage Coverage	100%
Maximum daily value	63.6 $\mu\text{g}/\text{m}^3$
Mean daily value	18.7 $\mu\text{g}/\text{m}^3$

#### 10.1.4.3 Nitrogen Dioxide (NO<sub>2</sub>)

Nitrogen dioxide and oxides of nitrogen data for the 2006/2007 monitoring period at Ferbane is presented in Table 10.5. One hourly mean NO<sub>2</sub> value was above the lower assessment threshold of 200  $\mu\text{g}/\text{m}^3$ . The CAFE Directive stipulates that this threshold should not be exceeded more than 18 times in a calendar year. The mean hourly NO<sub>2</sub> value of 5.2  $\mu\text{g}/\text{m}^3$  was below the annual lower assessment threshold for the protection of human health, which is 26  $\mu\text{g}/\text{m}^3$ .

Table 10.5 Nitrogen Dioxide and Oxides of Nitrogen Data Ferbane 2006/2007

Parameter	Measurement
No. of hours	4,210
No. of measured values	4,153
Percentage Coverage	99.5%
Maximum hourly value (NO <sub>2</sub> )	106.4 $\mu\text{g}/\text{m}^3$
99.8 percentile for hourly values (NO <sub>2</sub> )	42.6 $\mu\text{g}/\text{m}^3$
Mean hourly value (NO <sub>2</sub> )	5.2 $\mu\text{g}/\text{m}^3$

Parameter	Measurement
Mean hourly value (NOx)	6.7 µg/m <sup>3</sup> NO <sub>2</sub>

#### 10.1.4.4 Carbon Monoxide (CO)

Carbon Monoxide data for the 2006/2007 monitoring period at Ferbane is presented in Table 10.6. The mean hourly concentration of carbon monoxide recorded was 0.2 mg/m<sup>3</sup>. The carbon monoxide limit value for the protection of human health is 10 mg/m<sup>3</sup>. The lower Assessment Threshold is 5 mg/m<sup>3</sup>. On no occasions were values in excess of the 10 mg limit value set out in the CAFE Directive/ Air Quality Standards Regulations 2011 (as amended) recorded.

Table 10.6 Carbon Monoxide Data Ferbane 2006/2007

Hourly Values	Result
No. of hours	4,210
No. of measured values	3,663
Percentage Coverage	87.6%
Maximum hourly value	1.7 mg/m <sup>3</sup>
98 percentile for hourly values	0.7mg/m <sup>3</sup>
Mean hourly value	0.2mg/m <sup>3</sup>
Maximum 8-hour mean	1.4 mg/m <sup>3</sup>
98 percentile for 8-hour mean	0.6 mg/m <sup>3</sup>

#### 10.1.4.5 Dust

There are no statutory limits for dust deposition in Ireland. However, EPA guidance suggests that a deposition of 10 mg/m<sup>2</sup>/hour can generally be considered as posing a soiling nuisance. This equates to 240 mg/m<sup>2</sup>/day. The EPA recommends a maximum daily deposition level of 350 mg/m<sup>2</sup>/day when measured according to the TA Luft Standard 2002.

Construction dust has the potential to be generated from on-site activities such as excavation and backfilling. The extent of dust generation at any site depends on the type of activity undertaken, the location, the nature of the dust, i.e. soil, sand, peat, etc., and the weather. In addition, dust dispersion is influenced by external factors such as wind speed and direction and/or, periods of dry weather. Construction traffic movements also have the potential to generate dust as they travel along the haul route.

The potential dust-related effects on local air quality and the relevant associated mitigation measures are presented in Sections 10.1.5.2.2 and 10.1.5.3.2 below.

## 10.1.5 Likely Significant Effects and Associated Mitigation Measures

### 10.1.5.1 ‘Do-Nothing’ Effect

If the proposed development were not to proceed, there would be no exhaust emissions from construction plant and vehicles, nor would there be dust emissions due to the movement of the same. However, the opportunity to further reduce emissions of carbon dioxide, oxides of nitrogen (NO<sub>x</sub>), and sulphur dioxide (SO<sub>2</sub>) to the atmosphere would be lost resulting in a continued dependence on electricity derived from fossil fuel, rather than renewable energy sources such as from the proposed wind farm. This will result in an indirect negative impact on air quality.

### 10.1.5.2 Construction Phase

#### 10.1.5.2.1 Exhaust Emissions

##### Turbines and Other Infrastructure

The construction of turbine bases and hardstands, the substation, underpasses, site roads, site entrances, anemometry mast bases, grid connection cabling and other onsite infrastructure will require the operation of construction vehicles and plant on site. Exhaust emissions associated with vehicles and plant will arise as a result of construction activities. This potential effect will not be significant and will be restricted to the duration of the construction phase and localised to works locations. Therefore, this is considered a short-term slight negative impact. Mitigation measures to reduce this impact are presented below.

##### N52/N62 Junction Bypass

The junction accommodation works along the proposed turbine haul route will encompass the bypass of the junction between the N52 and N62 National Secondary Roads, as outlined in Chapter 4 of this EIAR. The use of construction vehicles at this location will give rise to exhaust emissions, creating a short-term slight negative impact in terms of air quality. Mitigation measures in relation to exhaust emissions are presented below.

##### 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 exhaust emissions associated with the transport vehicles. This constitutes a slight negative impact in terms of air quality. Mitigation measures in relation to exhaust emissions are presented below.

##### Mitigation

- All construction vehicles and plant will be maintained in good operational order while onsite, thereby minimising any emissions that arise.
- Machinery will be switched off when not in use.
- Turbines and construction materials will be transported to the site on specified routes only, unless otherwise agreed with the Planning Authority.



- Aggregate materials for the construction of site access tracks and all associated infrastructure will all be locally sourced, where possible, which will further reduce potential emissions.

### Residual Impact

Short-term Imperceptible Negative impact.

### Significance of Effects

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

## 10.1.5.2.2 **Dust Emissions**

### Turbines and Other Infrastructure

The construction of turbine bases and hardstands, underpasses, site roads, site entrances, anemometry mast bases and other onsite infrastructure will give rise to dust emissions during the construction phase. The potential for impacts on off-site receptors is limited due to the isolated nature of the site and the vegetative screening that exists surrounding the site. This potential effect will not be significant and will be restricted to the duration of the construction phase. Therefore, this is a short-term slight negative impact. Dust suppression mitigation measures to reduce this impact are presented below.

### Grid Connection

The construction of the substation and excavation of associated connection to the National Grid will give rise to localised dust emission during their construction. The potential for impacts on off-site receptors is limited due to the isolated nature of the site and the vegetative screening that exists surrounding the site. This is a short-term slight negative impact. Mitigation measures to reduce this impact are presented below.

### N52/N62 Junction Bypass

The junction accommodation works along the proposed turbine haul route will encompass the bypass of the junction between the N52 and N62 National Secondary Roads, as outlined in Chapter 4 of this EIAR, will also give rise to some localised dust, particularly during periods of dry weather. This is a short-term slight negative impact in terms of air quality. Mitigation measures to reduce this impact are presented below.

### Transport to Site

The transport of turbines and construction materials to the wind farm site will also give rise to some localised dust emissions during periods of dry weather. This is a short-term slight negative impact. Mitigation measures to reduce the significance of this effect are presented below.

### Mitigation

- Sporadic wetting of loose stone surface will be carried out during the construction phase to minimise movement of dust particles to the air. In periods of extended dry weather, dust suppression may be necessary along haul roads to ensure dust does not cause a nuisance. If necessary, water will be taken from stilling ponds in the site's drainage system and will be pumped into a bowser or water spreader to dampen down haul roads and site compound to prevent the generation of dust where

required. Water bowser movements will be carefully monitored to avoid, insofar as reasonably possible, increased runoff.

- All plant and materials vehicles shall be stored in dedicated areas (on site).
- Areas of excavation will be kept to a minimum, and stockpiling will be minimised by coordinating excavation, spreading and compaction.
- Turbines and construction materials will be transported to the site on specified haul routes only.
- The agreed haul route roads adjacent to the site will be regularly inspected for cleanliness and cleaned as necessary.
- The transport of construction materials to the site that have significant potential to cause dust, will be undertaken in tarpaulin or similar covered vehicles where necessary.
- A Construction and Environmental Management Plan (CEMP) will be in place throughout the construction phase (see Appendix 4.3). The CEMP includes dust suppression measures.

### Residual Impact

Short-term Imperceptible Negative Impact

### Significance of Effects

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

## 10.1.5.3 Operational Phase

### 10.1.5.3.1 Exhaust Emissions

Exhaust emissions associated with the operational phase of the proposed development will arise from machinery and vehicles that are intermittently required onsite for maintenance. This will give rise to a long-term imperceptible impact.

### Mitigation

Any vehicles or plant brought onsite during the operational phase will be maintained in good operational order, thereby minimising any emissions that arise.

### Residual Impact

Long-term Imperceptible Negative Impact

### Significance of Effects

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

### 10.1.5.3.2 Air Quality

Although exhaust emissions will arise during the construction phase, the proposed development, by providing an alternative to electricity derived from coal, oil or gas-fired power stations, will result in emission savings of carbon dioxide (CO<sub>2</sub>), oxides of nitrogen (NO<sub>x</sub>), and sulphur dioxide SO<sub>2</sub>. The production of renewable energy from the proposed development will have a long-term significant positive impact on air quality. Further details on the carbon dioxide savings associated with the proposed development are presented in Section 10.2.3 below.

### Residual Impact

Long-term Significant Positive Impact

### Significance of Effects

Based on the assessment above there will be a significant positive direct and indirect effect.

#### 10.1.5.3.3 **Human Health**

Long-term exposure to chemicals such as SO<sub>2</sub> and NO<sub>x</sub> are harmful to human health. The production of clean, renewable energy from the proposed development will offset the emission of these harmful chemicals by fossil fuel powered sources of electricity and, therefore, will have a long-term slight positive impact on human health. Further information on the impact of the proposed development on Human Health is contained in Chapter 5: Population and Human Health.

### Residual Impact

Long-term Slight Positive Impact

### Significance of Effects

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

#### 10.1.5.4 **Decommissioning Phase**

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.

## 10.2 **Climate**

All relevant legislation and policy in relation to climate is outlined in detail in Chapter 2 of this EIAR. A summary of the same is provided in the following sections.

### 10.2.1 **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. These 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.

### 10.2.1.1 Greenhouse Gas Emission Targets

Ireland is a Party to the Kyoto Protocol, which is an international agreement that sets limitations and reduction targets for greenhouse gases for developed countries. It is a protocol to the United Nations Framework for the Convention on Climate Change. The Kyoto Protocol came into effect in 2005, as a result of which, emission reduction targets agreed by developed countries, including Ireland, are now binding.

Under the Kyoto Protocol, the EU agreed to achieve a significant reduction in total greenhouse gas emissions in the period 2008 to 2012. Ireland's contribution to the EU commitment for the period 2008 – 2012 was to limit its greenhouse gas emissions to no more than 13% above 1990 levels.

#### 10.2.1.1.1 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 1 January 2013 to 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 five percent against 1990 levels. During the second commitment period, Parties committed to reduce GHG emissions by at least 18 percent below 1990 levels in the eight-year period from 2013 to 2020; however, the composition of Parties in the second commitment period is different from the first.

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.

#### 10.2.1.1.2 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.

#### 10.2.1.1.3 COP25 Climate Change Conference

The 25<sup>th</sup> United Nations Climate Change conference COP25 was held in Madrid and ran from December 2<sup>nd</sup> to December 13<sup>th</sup>, 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<sub>2</sub> 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. The Commission will present draft laws for the new deal to the EU in January of 2020 and if accepted will likely be implemented in 2021. Decisions regarding the global carbon market were postponed until the next Climate Conference (COP26) which will be held in Glasgow in November 2020.

#### 10.2.1.1.4 Emissions Projections

Ireland's target is to achieve a 20% reduction of non-Emissions Trading Scheme (non-ETS) sector emissions, i.e. agriculture, transport, residential, commercial, non-energy intensive industry and waste, on 2005 levels, with annual binding limits set for each year over the period 2013 – 2020. The Environmental Protection Agency (EPA) publish Ireland's Greenhouse Gas Emission Projection and at the time of writing, the most recent report, 'Ireland's Greenhouse Gas Emissions Projections 2018– 2040' was published in June 2019. The report includes an assessment of Ireland's progress towards achieving its emission reduction targets out to 2020 and 2030 set under the EU Effort Sharing Decision (Decision No 406/2009/EU) and Effort Sharing Regulation (Regulation (EU) 2018/842).

The 2019 emission projections report include the impact of new climate mitigation policies and measures which were outlined in the National Development Plan 2018. These projections see a greater impact from policies and measures and a greater reduction in emissions over the longer term, particularly in the "With Additional Measures" scenario. The 2019 emissions projections do not take into account policies and measures set out in the Climate Action Plan 2019. Such measures will be taken into consideration in an updated future projections report in 2020.

Greenhouse gas emissions are projected to 2040 using two scenarios; 'With Existing Measures' and 'With Additional Measures'. The 'With Existing Measures' scenario assumes that no additional policies and measures, beyond those already in place by the end of 2017 (latest national greenhouse gas emission inventory) are implemented. The 'With Additional Measures' scenario assumes the implementation of the "With Existing Measures" scenario and further implementation of the governments renewable and energy efficiency policies including those set out in the National Renewable Energy Action Plan (NREA), the National Energy Efficiency Action Plan (NEEAP) and the National Development Plan 2018-2027.

The EPA Emission Projections Update notes the following key trends:

- Total emissions are projected to increase from current levels by 1% and 6% by 2020 and 2030, respectively, under the "With Existing Measures" scenario.
- Under the "With Additional Measures" scenario, emissions are estimated to decrease by 0.4% and 10% by 2020 and 2030, respectively.
- Ireland's non-Emissions Trading Scheme (ETS) emissions are projected to be 5% and 6% below 2005 levels in 2020 under the 'With Measures' and 'With Additional Measures' scenarios, respectively. The target for Ireland is a 20% reduction.
- Ireland has exceeded its annual binding limits in 2016 and 2017 under both scenarios, 'With Measures' and 'With Additional Measures'.
- Over the period 2013 – 2020, Ireland is projected to cumulatively exceed its compliance obligations by 10 Mt CO<sub>2</sub> (metric tonnes of Carbon Dioxide) equivalent under the 'With Measures' scenario and 9 Mt CO<sub>2</sub> equivalent under the 'With Additional Measures' scenario.

The report concludes:

- *"Projections indicate that Ireland will exceed the carbon budget over the period 2021-2030 by 52-67Mt CO<sub>2</sub> equivalent with the gap potentially narrowing to 7-22 Mt CO<sub>2</sub>*

*equivalent if both the ETS and LULUCF flexibilities described in the Regulation are fully utilised.”*

- *“To determine compliance under the Effort Sharing Decision, any overachievement of the binding emission limit in a particular year (between 2013 and 2020) can be banked and used towards compliance in a future year. However, even using this mechanism Ireland will still be in non-compliance according to the latest projections.”*
- *“A significant reduction in emissions over the longer term is projected as a result of the expansion of renewables (e.g. wind), assumed to reach 41-54% by 2030, with a move away from coal and peat... [...] ... However, Ireland still faces significant challenges in meeting EU 2030 targets in the non-ETS sector and national 2050 reduction targets in the electricity generation, built environment and transport sectors. Progress in achieving targets is dependent on the level of implementation of current and future plans.”*

#### 10.2.1.1.5 **Progress to Date**

The ‘Europe 2020 Strategy’ is the EU’s agenda for growth and jobs for the current decade. The Europe 2020 Strategy targets on climate change and energy include:

- Reducing greenhouse gas (GHG) emissions by at least 20% compared with 1990 levels;
- Increasing the share of renewable energy in final energy consumption to 20%; and
- Moving towards a 20% increase in energy efficiency.

Further details on the Europe 2020 Strategy are included in Chapter 2: Background to the Proposed Development of this EIAR. Regarding progress on targets, the ‘*Europe 2020 indicators – climate change and energy*’ report provides a summary of recent statistics on climate change and energy in the EU.

In 2015, EU greenhouse gas emissions, including emissions from international aviation and indirect carbon dioxide (CO<sub>2</sub>) emissions, were down by 22.1% when compared with 1990 levels. However, regarding the progress of individual Member States, and Ireland in particular, the Europe 2020 indicators include the following statements:

- 24 countries are on track to meet their GHG targets, except Austria, Belgium, Ireland and Luxembourg.
- Luxembourg emitted the most GHG per capita in the EU in 2014 followed by Estonia, Ireland and the Netherlands.
- In 2015, Malta was the farthest from reaching their national target, followed by Ireland, Belgium and Luxembourg.

#### 10.2.1.1.6 **United Nations Sustainable Development Summit 2015**

*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. Coming into effect on January 1<sup>st</sup>, 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.

The Sustainable Development Goals National Implementation Plan 2018-2020 was published by the Department of Communications, Climate Action & Environment in partnerships with OSI, Esri Ireland and the Central Statistics Office. The Plan sets out how Ireland will work to achieve the goals and targets of the Agenda for Sustainable Development both domestically and internationally. Relevant SDGs and how they are implemented into Irish National plans and policies can be found in Table 10.7.

Table 10.7 United Nations Sustainable Development Goals adopted in 2015. <https://sustainabledevelopment.un.org/sdgs>

SDG	Targets	International Progress to Date (2019)	National Relevant Policy
<p><b>SDG 7 Affordable and Clean Energy:</b> <i>Ensure access to affordable, reliable, sustainable and modern energy for all</i></p>	<ul style="list-style-type: none"> <li>➤ By 2030, ensure universal access to affordable, reliable and modern energy services</li> <li>➤ By 2030, increase substantially the share of renewable energy in the global energy mix</li> <li>➤ By 2030, double the global rate of improvement in energy efficiency</li> <li>➤ 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</li> <li>➤ 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</li> </ul>	<p>The renewable energy share of total final energy consumption gradually increased from 16.6 per cent in 2010 to 17.5 per cent in 2016, though much faster change is required to meet climate goals.</p> <p>Global primary energy intensity (ratio of energy used per unit of GDP) improved from 5.9 in 2010 to 5.1 in 2016, a rate of improvement of 2.3 per cent, which is still short of the 2.7 per cent annual rate needed to reach target 3 of Sustainable Development Goal 7.</p>	<p><i>Ireland's Transition to a Low Carbon Energy Future 2015-2030</i></p> <p><i>Strategy to Combat Energy Poverty in Ireland</i></p> <p><i>Ireland's Transition to a Low Carbon Energy Future 2015-2030</i></p> <p><i>National Mitigation Plan</i></p> <p><i>National Energy Efficiency Action Plan for Ireland # 4 2017-2020</i></p> <p><i>Better Energy Programme</i></p> <p><i>One World, One Future</i></p> <p><i>The Global Island</i></p>
<p><b>SDG 13 Climate Action:</b> <i>Take urgent action to combat climate change and its impacts*</i></p> <p><i>*Acknowledging that the United Nations Framework Convention on Climate Change is the primary international,</i></p>	<p>Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries</p> <p>Integrate climate change measures into national policies, strategies and planning</p> <p>Implement the commitment undertaken by developed-country parties to the United Nations Framework Convention</p>	<p>In 2017, greenhouse gas concentrations reached new highs, with globally averaged mole fractions of CO<sub>2</sub> at 405.5 parts per million (ppm), up from 400.1 ppm in 2015, and at 146 per cent of pre-industrial levels. Moving towards 2030 emission objectives compatible with the 2°C and 1.5°C pathways requires a peak to be achieved as soon as possible, followed by rapid reductions.</p>	<p><i>National Adaptation Framework</i></p> <p><i>Building on Recovery: Infrastructure and Capital Investment 2016-2021</i></p> <p><i>National Mitigation Plan</i></p>

SDG	Targets	International Progress to Date (2019)	National Relevant Policy
<i>intergovernmental forum for negotiating the global response to climate change.</i>	<p>on Climate Change to a goal of mobilising jointly \$100 billion annually by 2020 from all sources to address the needs of developing countries in the context of meaningful mitigation actions and transparency on implementation and fully operationalize the Green Climate Fund through its capitalization as soon as possible</p>	<p>During the period 1998–2017, direct economic losses from disasters were estimated at almost \$3 trillion. Climate-related and geophysical disasters claimed an estimated 1.3 million lives.</p> <p>As of April 2019, 185 parties had ratified the Paris Agreement. Parties to the Paris Agreement are expected to prepare, communicate and maintain successive nationally determined contributions, and 183 parties had communicated their first nationally determined contributions to the secretariat of the United Nations Framework Convention on Climate Change, while 1 party had communicated its second. Under the Agreement, all parties are required to submit new nationally determined contributions, containing revised and much more ambitious targets, by 2020.</p> <p>Global climate finance flows increased by 17 per cent in the period 2015–2016 compared with the period 2013–2014.</p> <p>As at 20 May 2019, 75 countries are seeking support from the Green Climate Fund for national adaptation plans and other adaptation planning processes, with a combined value of \$191 million.</p>	<p><i>National Biodiversity Action Plan 2017-2021</i></p> <p><i>National Policy Position on Climate Action and Low Carbon Development</i></p>

### 10.2.1.1.7 Climate Action Network Europe Off Target Report 2018

The June 2018 ‘Off Target Report’ published by the Climate Action Network (CAN) Europe which ranks EU countries ambition and progress in fighting climate change listed Ireland as the second worst performing EU member state in tackling climate change. It also stated that Ireland is set to miss its 2020 climate (20% reduction in greenhouse gases) and renewable (40% increase in overall energy from renewable electricity sources) energy targets. Additionally, it was noted that Ireland is also off course for its 2030 emissions target.



In March 2019, the Minister for Communications, Climate Action, and the Environment, Richard Bruton, announced a renewable electricity target of 70% by 2030 for Ireland. Furthermore, the release of the Climate Action Plan in June 2019 has noted a 30% reduction in greenhouse gases by 2030. Considering only renewable energy from electricity as part of this plan and to meet the required level of emissions reduction by 2030, Ireland will:

- Reduce CO<sub>2</sub> eq. emissions from the sector by 50–55% relative to 2030 NDP projections.
- Deliver an early and complete phase-out of coal- and peat-fired electricity generation.
- Increase electricity generated from renewable sources to 70%, indicatively comprised of:
  - at least 3.5 GW of offshore renewable energy;
  - up to 1.5 GW of grid-scale solar energy; and
  - up to 8.2 GW total of increased onshore wind capacity.
- Meet 15% of electricity demand by renewable sources contracted under Corporate PPAs.

Achieving 70% renewable electricity by 2030 will involve phasing out coal and peat-fired electricity generation plants, increasing our renewable electricity, reinforcing our grid (including greater interconnection to allow electricity to flow between Ireland and other countries), and putting systems in place to manage intermittent sources of power, especially from wind.

As noted previously, Ireland are not on track for meeting their 2020 renewable energy targets. It is now more critical than ever that we continue to progress renewable energy development in Ireland so as we are successful in meeting our 2030 target.

The Climate Action Plan noted specific sectors which are required to step-up in order to help Ireland achieve its EU targets. The renewable energy sector was cited alongside the country’s commitment to increase onshore wind capacity by up to 8.2 GW. The proposed Derrinlough Wind Farm will help contribute towards this target.

Further detail on the EU 2030 targets are noted in Chapter 2, Section 2.3 of this EIAR.

#### 10.2.1.1.8 **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 2020 CCPI was published in December 2019 and presented at the COP25. While the CCPI 2020 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 the worst performer in the CCPI 2019, climbed 7 places to 41<sup>st</sup> place and has moved from a “very low” performer to a “low” performer in international performance. However, it remains at “very low” at a national performance level. The CCPI report states that while some improvements have been made, GHG per capita emissions are at a high level and “significant challenges lie ahead in closing Ireland’s emission gap, meeting the current (2030) target and aligning Ireland’s emission trajectory with a net zero goal for 2050. Therefore, the country still ranks among the bottom ten performers in this indicator.” Recognising Ireland’s Climate Action Plan 2019, the CCPI states:

*“the government must go much further in implementing policies across all sectors that drive sustained emissions reductions over the next decade. Near-term ambition needs to be ratcheted up quickly by specifying deep cuts in fossil fuel and reactive nitrogen usage to put Ireland on a net zero emissions pathway aligned with the Paris temperature goals”.*

## 10.2.2 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 Birr, Co. Offaly, is the nearest weather and climate monitoring station to the proposed development site that has meteorological data recorded for the 30-year period from 1979-2008. The monitoring station is located approximately 6.9km southwest of the site. Meteorological data recorded at Birr over the 30-year period from 1979-2008 is shown in Table 10.8. The wettest month was October and the driest month on average was April. July was the warmest month with a mean temperature of 19.6° Celsius.

Table 10.8 Data from Met Éireann Weather Station at Birr 1979–2008: Monthly and Annual Mean and Extreme Values

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
<b>TEMPERATURE (degrees Celsius)</b>													
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
min. maximum	-3.5	-0.5	2.0	4.3	6.3	10.5	12.5	11.6	9.7	5.9	2.7	-1.0	-3.5
max. minimum	11.6	12.1	12.2	13.0	15.2	16.6	18.9	18.1	17.9	15.7	12.8	13.0	18.9
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 num. 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 num. 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
mean 5cm soil	3.9	3.9	5.7	9.0	13.0	16.0	17.2	16.4	13.5	9.4	6.2	4.5	9.9
mean 10cm soil	4.1	4.2	5.6	8.2	11.8	14.8	16.3	15.6	13.0	9.4	6.5	4.8	9.5
mean 20cm soil	4.8	5.0	6.4	8.8	12.1	14.9	16.6	16.2	14.0	10.5	7.5	5.6	10.2
<b>RELATIVE HUMIDITY (%)</b>													
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
<b>SUNSHINE (hours)</b>													
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 num. 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
<b>RAINFALL (mm)</b>													
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 $\geq 0.2$ mm	19	15	19	15	16	16	16	18	17	19	18	18	206
mean num. of days with $\geq 1.0$ mm	14	11	14	11	12	11	11	12	11	14	13	13	147

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Year
mean num. of days with $\geq 5.0\text{mm}$	5	4	4	3	4	4	3	5	4	6	5	6	53
<b>WIND (knots)</b>													
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
<b>WEATHER (mean no. of days with)</b>													
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

## 10.2.3 Calculating Carbon Losses and Savings from the Proposed Development

### 10.2.3.1 Background

Carbon dioxide (CO<sub>2</sub>) 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<sub>2</sub> when the material decomposes. Organic material acts as a store of carbon. Peatland habitats are significant stores of organic carbon. The vegetation on a peat bog slowly absorbs CO<sub>2</sub> from the atmosphere when it is active 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 accumulating mass of the peatland.

The carbon balance of proposed 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 effects and loss of peat in the area of the development footprint. There may also be indirect effects where it is necessary to install drainage in certain areas to facilitate construction. The works can either directly or indirectly allow the peat to dry out, which permits the full decomposition of the stored organic material with the associated release of the stored carbon as CO<sub>2</sub>. It is essential therefore that any wind farm development in a peatland area saves more CO<sub>2</sub> than is released.

### 10.2.3.2 Calculating Carbon Losses and Savings

Bord na Móna developed a methodology based on their extensive experience for calculating carbon losses and savings from proposed wind farm development. The methodology was informed by the Scottish Government's Carbon Calculator<sup>1</sup> and other relevant information sources such as:

- Multiyear greenhouse gas balances at a rewetted temperate peatland. (Wilson et al., 2016);
- Greenhouse gas Emission Factors. (Wilson et al., 2016);
- 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).

This was used to assess the effects of the proposed wind farm in terms of potential carbon losses and savings taking into account peat removal, drainage and operation of wind farm. The methodology reflects the specific nature of the cutaway peat lands upon which the project is proposed to be located.

The completed worksheet including the assumptions used in the model is provided as Appendix 10.1 to this ELAR. The peat losses are based on the volume of peat disturbed and redistributed, and takes a 'worst case' approach, by assuming that the in-situ peat had been rewetted and therefore had zero net emissions, and the redistributed peat has high emissions associated with rushes and birch/willow scrub habitat type.

The model calculates the total carbon emissions associated with the proposed wind farm development including manufacturing of the turbine technology, transport, construction of the development and carbon losses due to peatland disturbance.

The model also calculates the carbon savings associated with the proposed wind farm development against three comparators:

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<sup>1</sup> Scottish Government (2016) <http://informatics.sepa.org.uk/CarbonCalculator/>

1. The average fossil emissions on the Irish Grid – based on the SEM Reference mid-merit plant
2. The EU Fossil Fuel Comparator (a measure of the fossil intensity across the European market)
3. A displaced ‘Load Following’ combined cycle gas turbine plant.

The expected and maximum, worst-case scenario CO<sub>2</sub> losses due to the proposed wind farm development are summarised in Table 10.9 and the total savings against the three comparators listed above are summarised in Table 10.10.

Table 10.9 CO<sub>2</sub> losses from the Proposed Development

Origin of Losses	CO <sub>2</sub> Losses (tonnes CO <sub>2</sub> equivalent)
Losses due to turbine life (e.g. manufacture, construction, decommissioning)	76,173
Losses due to Additional Cycling Emissions	110,811
Losses from peat land disturbance emissions	5,681
<b>Total</b>	<b>192,665</b>

The peat losses are based on the volume of peat disturbed and redistributed and takes a ‘worst case’ approach as described above.

Table 10.10 Wind Farm Lifetime Savings

Comparator	CO <sub>2</sub> Savings (tonnes CO <sub>2</sub> equivalent)	Payback (years)
SEM Mid-Merit Plant	5,141,287	1.12
EU Fossil Fuel Comparator (FFC)	4,549,469	1.27
‘Load Following’ Combined Cycle Gas Turbine Plant	2,725,552	2.12

Based on the Bord na Móna model calculations as presented above, 192,665 tonnes of CO<sub>2</sub> will be lost to the atmosphere due to changes in the peat environment, changes in the cycling of mid-merit gas-fired generation units and due to the construction, operation and decommissioning of the proposed development. This represents a fraction ( EU FFC – 4.2%) of the total amount of carbon dioxide emissions that will be offset by the proposed wind farm project as set out in Table 10.9. The volume of CO<sub>2</sub> that will be lost to the atmosphere will be offset by the proposed development between 1 and 2 years of operation, depending on the fuel source to which it is compared.

## 10.2.4 Likely Significant Effects and Associated Mitigation Measures

### 10.2.4.1 ‘Do-Nothing’ Effect

If the proposed development were not to proceed, greenhouse gas emissions, e.g. carbon dioxide (CO<sub>2</sub>), carbon monoxide and nitrogen oxides associated with construction vehicles and plant would not arise. However, the opportunity to further significantly reduce emissions of greenhouse gas emissions, including carbon dioxide (CO<sub>2</sub>), oxides of nitrogen (NO<sub>x</sub>), and sulphur dioxide (SO<sub>2</sub>), 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 impact.

The proposed Derrinlough Wind Farm development will be integrated into the Rehabilitation Plans for Clongawny and Drinagh Bogs. It will therefore not have a significant impact on the plans for rehabilitation in the Do-Nothing Scenario either with respect to habitat development or the carbon balance of the site. The Draft Rehabilitation Plans for Clongawny and Drinagh Bogs are included in Appendix 6.8.

### 10.2.4.2 Construction Phase

#### 10.2.4.2.1 Greenhouse Gas Emissions

##### Turbines and Other Infrastructure

The construction of turbine bases and hardstands, underpasses, site roads, site entrances, anemometry mast bases and all associated infrastructure will require the operation of construction vehicles and plant on site. Greenhouse gas emissions, e.g. carbon dioxide (CO<sub>2</sub>), carbon monoxide and nitrogen oxides associated with vehicles and plant will arise as a result of the construction and demolition activities. This potential impact will be slight, given the insignificant quantity of greenhouse gases that will be emitted, and will be restricted to the duration of the construction phase. Therefore, this is a short-term slight negative impact. Mitigation measures to reduce this impact are presented below.

##### Grid Connection

The construction of 1 No. 110 kV substation and excavation of associated cable trenches will require the use of construction machinery giving rise to greenhouse emissions. This is a short-term slight negative impact, which will be reduced through use of the best practice mitigation measures as presented below.

##### N52/N62 Junction Bypass

The junction accommodation works along the proposed turbine haul route will encompass the bypass of the junction between the N52 and N62 National Secondary Roads, as outlined in Chapter 4 of this EIAR. This will require the use of construction machinery giving rise to greenhouse emissions. This is a short-term slight negative impact. Mitigation measures to reduce this impact are presented below.

##### 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. This constitutes a slight negative impact in terms of air quality. Mitigation measures in relation to greenhouse gas emissions are presented below.

## Mitigation

- All construction vehicles and plant will be maintained in good operational order while onsite, thereby minimising any emissions that arise.
- Turbines and construction materials will be transported to the site on specified routes only unless otherwise agreed with the Planning Authority.
- Aggregate materials for the construction of site access tracks and all associated infrastructure will all be locally sourced, where possible, which will further reduce potential emissions.

## Residual Impact

Short-term Imperceptible Negative Impact on Climate as a result of greenhouse gas emissions.

## Significance of Effects

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

### 10.2.4.3 Operational Phase

#### 10.2.4.3.1 Greenhouse Gas Emissions

The proposed development will generate energy from a renewable source. This energy generated will offset energy and the associated emission of greenhouse gases from electricity-generating stations dependent on fossil fuels, thereby having a positive effect on climate. As detailed in Table 10.8 above, the proposed development will displace carbon dioxide from fossil fuel-based electricity generation, over the proposed 30-year lifespan of the proposed wind farm. The proposed project will assist in reducing carbon dioxide (CO<sub>2</sub>) emissions that would otherwise arise if the same energy that the proposed wind farm will generate were otherwise to be generated by conventional fossil fuel plants. This is a long-term significant positive effect.

## Residual Impact

Long-term Moderate Positive Impact on Climate as a result of reduced greenhouse gas emissions.

## Significance of Effects

Based on the assessment above there will be a direct long-term moderate, positive effect.

### 10.2.4.4 Decommissioning Phase

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.

## 10.3 Cumulative Assessment

Potential cumulative effects on air quality and climate between the proposed development and other projects in the vicinity were also considered as part of this assessment. The projects considered as part of the cumulative effect assessment are described in Section 2.7 of this EIAR.



The nature of the proposed development is such that, once operational, it will have a long-term, moderate, positive impact on the air quality and climate.

During the construction phase of the proposed development and other projects described in Section 2.7 that are yet to be constructed, there will be minor emissions from construction plant and machinery and potential dust emissions associated with the construction activities. However, once the mitigation proposals, as outlined in this chapter are implemented, during the construction phase of the proposed development, there will be no cumulative negative effect on air and climate.

There will be no net carbon dioxide (CO<sub>2</sub>) emissions from operation of the Derrinlough Wind Farm. Emissions of carbon dioxide (CO<sub>2</sub>), oxides of nitrogen (NO<sub>x</sub>), sulphur dioxide (SO<sub>2</sub>) or dust emissions during the operational phase of the proposed development will be minimal, relating to the use of operation and maintenance vehicles onsite, and therefore there will be no measurable negative cumulative effect with other projects on air quality and climate.