

Ballinlee Wind Farm – Individual Submission

Submitted by: Brian Dooley

Address: Camas South, Bruff, County Limerick, V35 EH72

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1. Personal Standing

My name is Brian Dooley. I live at Camas South, Bruff with my parents and am an Energy Engineer by profession. I work in the field of renewable energy and energy systems optimisation and am strongly committed to the transition to a low-carbon economy. However, that transition must be grounded in credible evidence, good design, and respect for affected communities.

I am making this submission as a directly affected resident and as a professional in the energy sector. I support and align with the observations set out in the Dooley Family Submission but wish to emphasise several technical and procedural shortcomings that undermine the integrity of this application.

2. Grounds for Objection

2.1 Technical Integrity and Data Reliability

The EIAR's assessment of site suitability is based primarily on SEAI modelled wind-speed data, with no reference to on-site measurements. For a project of this scale, reliance on unvalidated desktop modelling is inadequate. The absence of empirical data compromises the reliability of output estimates and the justification for this specific location.

2.2 Grid Connection and System Integration

The grid connection route chosen is the longest of the options considered—27.6 km to Killonan substation—while shorter and potentially less disruptive alternatives were dismissed on vague qualitative grounds. From a systems and lifecycle perspective, this increases embodied energy, capital cost, and long-term transmission losses. An Bord Pleanála explicitly requested that grid connection alternatives be revisited, yet no quantitative comparison has been provided.

2.3 Borrow-Pit and Construction Logistics

The proposal assumes on-site material sourcing through borrow pits, yet no through site investigations have verified the suitability of the underlying geology. This introduces a significant contingency risk: if the material proves unsuitable, large volumes of stone and aggregate will need to be imported from external quarries. Such a scenario would materially alter the construction profile of the project.

The consequences extend well beyond technical inconvenience. Heavy Goods Vehicle (HGV) traffic would increase substantially, placing strain on rural road networks that are neither designed nor maintained for sustained industrial haulage. Residents would face prolonged noise, dust, and vibration, as well as heightened road safety risks from frequent HGV movements through local villages and past schools. Journey times for ordinary community activities—commuting, farming, school runs, and emergency services—would be disrupted.

This risk is not acknowledged in the alternatives analysis in the form of a full report, nor are the socio-economic costs of such disruption fully quantified. By ignoring the possibility that borrow pits may be unviable, the EIAR presents an incomplete and overly optimistic picture of construction impacts. The omission undermines the credibility of the project's claimed carbon savings and environmental performance, while failing to account for the real and tangible burdens that would be imposed on the host community.

2.4 Technological alternatives

The EIA Directive requires that reasonable alternatives—including design and technology—be considered. Chapter 3 of the EIAR does not provide a detailed comparative assessment of turbine configurations or layouts that might reduce unit numbers or visual impact, nor does it quantify the implications of alternative grid connection routes. The absence of a robust alternatives analysis undermines confidence that the chosen design represents the least-impact solution. This omission weakens the procedural integrity of the EIAR and fails to demonstrate full compliance with the Directive's requirements.

3. Personal Impact Statement

As both a resident and an engineer, I find it troubling that a project of this magnitude is being advanced on the basis of unverified, model-heavy data. Without detailed on-site studies, the projected energy outputs, construction impacts, and long-term benefits remain assumptions rather than established facts. Communities asked to host such infrastructure deserve confidence that the evidence underpinning it has been rigorously tested.

From our home, at least five turbines will be visible to the north and up to twelve to the south. The visual impact will be transformative, but the greater concern is precedent. If projects of this scale are permitted to proceed without robust empirical data, it lowers the evidential bar for all future renewable developments in Ireland. That erosion of standards does not only affect this locality; it undermines public trust in the renewable transition nationally.

I recognise that developers must be afforded reasonable scope to define their projects, but with that scope comes responsibility: detailed, site-specific studies are essential to demonstrate that impacts have been properly assessed and that claimed benefits are credible. Proceeding without such evidence risks unforeseen construction disruptions, underperformance, and community impacts that could have been avoided with more rigorous preparation.

At a time when community support is essential for climate action, projects must demonstrate both technical integrity and transparency. Communities must be treated as partners in the transition, not collateral to it.

4. Conclusion and Requested Determination

I respectfully request that An Coimisiún Pleanála refuse permission for the Ballinlee Wind Farm in its current form. The proposal lacks the technical, procedural, and evidential integrity necessary to demonstrate that it represents the best use of resources or the least-impact solution. Should the application proceed, I ask that the developer be required to provide on-site wind data, a revised alternatives analysis including a full contingency plan in the case borrow pits are unviable, and transparent grid-impact modelling.

Renewable energy projects must demonstrate both climate benefit and procedural credibility. This proposal, in its present form, does neither.