

The Secretary,
An Coimisiún Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902
Case reference: PAX91.323780

Ballinlee Wind Farm – Individual Submission

Submitted by: Geoff Dooley
Address: Camas South, Bruff, County Limerick, V35 EH72

Date: 16th November, 2025

Personal Standing

My name is Geoff Dooley. I live at Camas South, Bruff, County Limerick, with my wife and family. Our home is located on a 30-acre property, of which 24 acres have been forested since 2005. I am a farmer, Environmental Scientist, and Strategy & Sustainability Consultant. I have over two decades of experience supporting organisations in aligning development, policy, and sustainability goals.

I am a directly affected resident of the Ballinlee area and an active participant in the community. I support renewable energy development and the taking of decisive action in response to the climate crisis. However, such action must be evidence-informed and consistent with the principles of sustainable development and good rural planning. I am opposed to the Ballinlee Wind Farm proposal as currently presented, on procedural, technical, and social grounds.

I support and align with the observations set out in the Dooley Family Submission and wish to make the following personal observations.

Grounds for Objection

Process Integrity and Planning Compliance

The EIAR for the Ballinlee Wind Farm demonstrates a *'design-before-evidence'* approach, where it is clear that the developer selected the most financially advantageous design and then uses the EIA to justify that design. Key project parameters—including site selection, scale, and grid routing were fixed and did not allow for the meaningful investigation of alternatives. This contravenes the intent of Article 5(1)(d) and Annex IV(2) of the EIA Directive, which requires developers to describe and compare reasonable alternatives in terms of location, design, size, and technology.

An Bord Pleanála's pre-application meetings (October 2024 and March 2025) explicitly referenced the assessment of grid and turbine delivery alternatives. The applicant's failure

to clarify in the EIAR represents a procedural deficiency that undermines the completeness of the application.

Groundwater and Soil Risk

Chapter 8 of the EIAR (Land, Soils and Geology) and the trial pit data in Appendices 8A and 8B confirm groundwater was encountered at depths from 1m in August 2024 and February 2025, proving that a high water table is not just a seasonal variable. Yet large-scale excavation is proposed for turbine bases and two on-site quarries (or what the EIAR refers to as borrow pits)

This raises legitimate concerns about hydrological stability, run-off, and surface water management. As a local resident, we know this site is vulnerable to flooding (see the Dooley family submission and below).



Figure 1: Photo looking towards the northern cluster of 5 turbines from the road outside my home. Photo taken 12th November, 2025.

These conditions indicate a fragile local water balance that has not been assessed. The developer's refusal to confront this issue was reaffirmed at the preplanning meeting held with ABP on 20th March 2025, where they stated they would not be interacting with the water table. See below:

- required for the various stages of the proposed development.
- In relation to the location of the proposed borrow pits, the prospective applicant was advised to consider the reasons for the locations chosen, including context relative to the nearest residential receptors and any intended processes to be undertaken/mitigation proposed as part of this element of the project.
 - The Board's representatives queried the volume of material to be removed at the borrow pit and if any ground water would be encountered during excavations. The prospective applicant stated that the volume would be dependent on the type of material (e.g. gravel or rock) and that they would not be interacting with the water table.
 - The Board's representatives queried whether the 2019 draft guidelines separation distances were being met in relation to all residential receptors, with the prospective applicant confirming this to be the case.

Figure 2: Extract from ABP's memo of the preplanning meeting with the developer on 20th March 2025 - where the developer states they will not be interacting with the water table.

From my perspective as a concerned community member, an environmental scientist and as a farmer with a keen awareness of the fragile ecosystem within which we have the privilege to live, the developer's disregard for the local reality demonstrates a lack of understanding, care and respect.

On-site Quarry (or "Borrow-Pit") Viability

The developer's claim that on-site borrow pits will reduce HGV movements and environmental footprint is unsubstantiated, based on very limited trial pit data. The data they do provide contradicts their claims of aggregate availability. See fig below.

PROJECT NUMBER 22635		DATE 07/02/2025	COORDINATES 560356, 633001
PROJECT NAME Ballinlee Green Energy		MACHINE Yanmar Universal Vio 50	COORD SYS ITM
CLIENT Ballinlee Green Energy Ltd			LOGGED BY DC
LOCATION Proposed Borrow Pit			CHECKED BY PC
COMMENTS			
Depth (m)	Graphic Log	Material Description	Additional Observations
		TOPSOIL	Sides spalling Boulder at 1mbgl Seepage at 2.3mbgl
		Brown gravelly, slightly sandy SILT	
0.5			
1		Brown gravelly, sandy SILT with several cobbles and few boulders.	

Figure 3: Extract from Appendix 8B showing that a small minidigger was used for the trial pit exploration. It also describes the type of material available on the site.

This trial pit exploration method, using a small mini digger (Yanmar Universal Vio 50), is not useful for deep exploration to bedrock and is incapable of taking bedrock samples or going past the bedrock.

Across all the trial pits, the predominant material was a shallow topsoil, followed by heavy brown clay and silt mixed with cobbles. This is very unlikely to be the type of aggregate the developer requires. And the developer has no evidence that it is a suitable load-bearing material because they didn't get it tested. Therefore, the EIAR's claims about the availability of on-site material are unsubstantiated. The implications are that it is impossible to have confidence in the other claims made in the EIAR around traffic movement, the import/export of spoils and aggregate, traffic impacts, and hydrogeological impacts.

If there isn't a suitable on-site aggregate via the on-site quarries they propose to create during the development phase, thousands of additional truck movements will occur, invalidating key sections of the EIAR's alternatives and traffic analyses.

Sustainability and Integrity

True sustainability requires not just renewable energy output but procedural fairness, environmental responsibility, and community legitimacy. This project fails on these measures. It relies heavily on desktop data, defers essential site-specific investigations (or deems them non-essential), and presents community engagement as a formality in the

provision of information rather than a generative dialogue. In alienating the community, the developer not only reveals their inexperience and ineptitude at complex, multi-stakeholder project development, but they have also blindsided and ignored a hugely valuable resource of local intelligence.

Personal and Community Impact

Our family home lies approximately 670m from the nearest proposed turbine (Turbine 4) and within 600 m of where the turbine delivery route will cross the Camas South road. At least five turbines will be visible to the north of our home and up to twelve to the south. These structures will dominate our visual horizon, introduce persistent low-frequency noise, and undermine the rural amenity that has defined this landscape for generations.

As a professional working in sustainability, I am particularly concerned that projects of this type, particularly when poorly evidenced, undermine public confidence in renewable energy and the concept of sustainable development more broadly. This EIAR indicates that the same extractive mindset that has led to a climate and biodiversity emergency has now captured the renewable energy space. This proposal is deeply damaging to the social licence upon which Ireland's climate transition depends.

Conclusion and Requested Determination

I respectfully request that An Coimisiún Pleanála refuse permission for the Ballinlee Wind Farm in its current form. The proposal fails to meet the requirements of the EIA Directive and the EPA's 2022 Guidelines, and it does not enable informed decision-making. If the Board determines that the application should proceed, it should require the developer to submit further information addressing hydrological impacts, quarry ("borrow-pit") feasibility, grid and transport alternatives, and meaningful community consultation.

I am fully supportive of renewable energy initiatives, climate and biodiversity positive initiatives that are transparent, socially just, proportionate, and evidence-informed. I am disappointed that this proposal conflicts with these essential principles.

Thank you for considering this submission.

Kind regards,

Geoff Dooley.