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

Ballinlee Wind Farm – Dooley Family Submission

Location: Camas South, Bruff, County Limerick, V35 EH72
Date: 16th November, 2025

Submitted by:
Geoff, Geraldine, and Brian Dooley (residents)
Conor and Ian Dooley (family members resident abroad)

Introduction and Standing

The Dooley family makes this submission in relation to the proposed Ballinlee Wind Farm. Our family home is situated at Camas South, Bruff (Eircode V35 EH72) on a 30-acre property, of which approximately 24 acres have been sustainably forested since 2005. We are directly affected residents with clear visual, hydrological, and social proximity to the proposed development. Five turbines will be visible from the north side of our home, and up to twelve turbines will be visible from the south-facing side of our home (Figs. 4 & 5). Specifically, turbines 4 and 5 will be 670m and 975m from our home.

Our family comprises:

- Geoff Dooley: Farmer, Environmental Scientist and Strategy & Sustainability Consultant
- Geraldine Dooley: Health care administrator
- Brian Dooley: Energy Engineer
- Conor Dooley: Tax Consultant, Luxembourg
- Ian Dooley: Teacher, Glasgow

This submission integrates our reviews of EIAR Chapters 3 and 8, our observations on Appendix 1C (Community Engagement Report), and our lived experience as residents of Camas South.

Summary of Grounds for Objection

1. Non-compliance with the EIA Directive (2014/52/EU), specifically the failure to consider reasonable alternatives to the proposed development as required under Article 5(1)(d) and Annex IV(2).

2. Inadequate site investigation and of the on-site quarries ("borrow-pits") and their viability. The developer's assumptions of the on-site availability of suitable quality aggregate in sufficient quantity are not supported by empirical data. This creates a cascade of doubt about the EIAR's assumptions on water impacts, traffic impacts and carbon emissions during construction.
3. There is a procedural failure of a "design-before-evidence" approach repeated across the EIAR chapters. This means that the developer began this process by designing the most financially advantageous wind farm and then used the EIAR to justify the predetermined design. This is a flawed approach. The design should arise from the findings of the EIA.
4. There is an incomplete and reactive analysis of grid and transport alternatives (Chapter 3), which means the proposal is predicated on a series of significant unknowns.
5. There was a deficient defensive and non-transparent community engagement process, which is clearly evidenced in Appendix 1C
6. The development, as proposed, places an unjust environmental risk and social burden on a small rural community, contrary to equity and just transition principles.

Technical and Procedural Evidence

Alternatives Not Demonstrated (Chapter 3)

The EIAR's analysis of alternatives is superficial and primarily desk-based. Site selection relied on SEAI wind-speed modelling without on-site validation. Eight alternative sites were rejected on vague qualitative grounds, such as 'residential density' and 'landscape considerations', without quantified data. The project objective, to deliver a 'large-scale wind development at Ballinlee' predetermined both location and scale, precluding meaningful comparison. This is a clear example of the developer using the EIA as justification for their design choice rather than the EIA being the basis for the design.

An Bord Pleanála explicitly requested, at pre-planning meetings in November 2024 and March 2025, that the applicant provide detailed consideration of alternatives for both grid connection and turbine delivery routes. These directions were not substantively acted upon. Appendix 2C (Turbine Delivery Route Report) defers assessment of the Adare Bypass (Foynes Road) route to a future stage. This is contrary to EIA requirements that reasonable alternatives be assessed before consent.

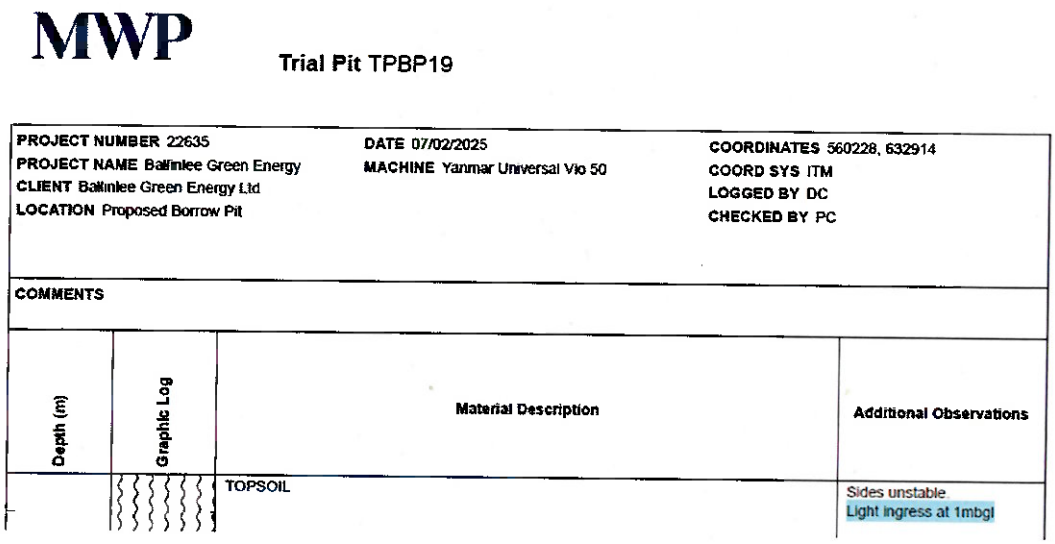
Quarry ("Borrow-Pit") Viability and Circular Reasoning (Chapter 8)

The EIAR assumes the availability of suitable aggregate on-site to justify reduced HGV (heavy goods vehicle) movements and environmental footprint. Chapter 8 ("Land, Soils and Geology") reveals this assumption to be unsubstantiated: the quarry sites are assessed based solely on secondary GSI (Geological Survey of Ireland) data without effective on-site investigation.

The developer claims that this site is a suitable location for two large-scale quarry sites to supply 61% of the aggregate required for the development, amounting to 99,852m^3 (or

4,992 HGV loads at 20m^3 per load). This claim is based on very limited trial pit data, without any rock core drilling to assess the extent of bedrock and with no assessment of the quality of aggregate actually available. Therefore, the developer's claims do not bear scrutiny and if allowed to proceed, risk critical hydrogeological impacts.

To demonstrate the limited research on which the developer's claims rest, see the figure below, taken from Appendix 8B. Of the potential sites investigated on February 7th, 2025, groundwater was evident at 50%. The depths at which water seepage became evident were at ranged from 1m below ground level to 2.3m below ground level (see example at Fig. 1).



MWP

Trial Pit TPBP19

PROJECT NUMBER 22635	**DATE** 07/02/2025	**COORDINATES** 560228, 632914
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 unstable. Light ingress at 1mbgl

Figure 1: Developer trial pit data showing water ingress at 1m below ground level

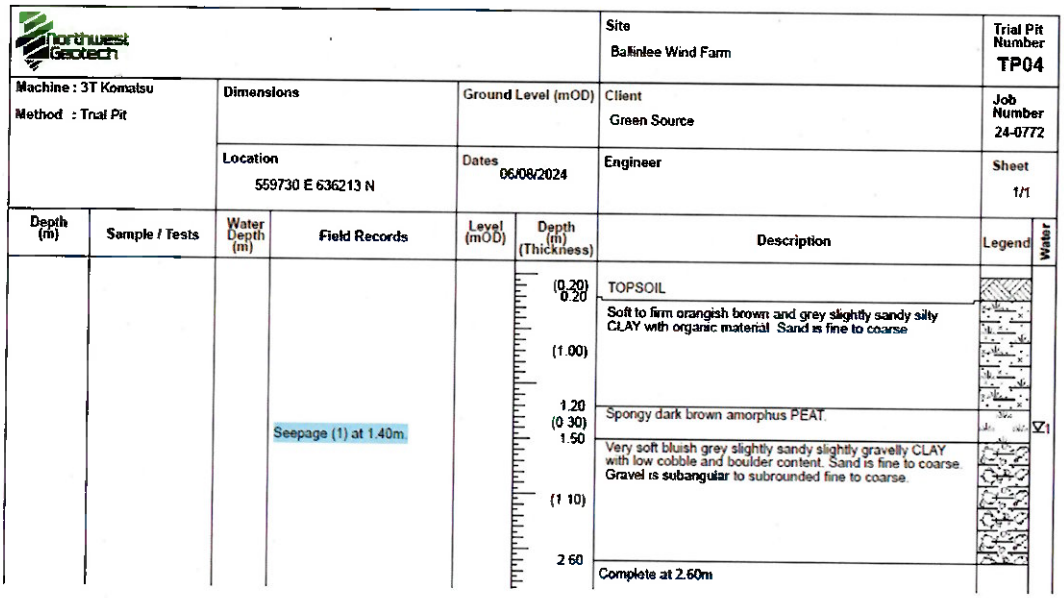
Furthermore, the character of the soils in Appendix 8B consistently shows a predominantly topsoil, followed by silts and heavy clay. The developer offers nothing by way of independently verified reassurance that this material is fit for purpose. We regard this as a significant omission that casts doubt over the viability of the project and the claims in other sections of the EIAR, reliant on the viability of the on-site quarries.

At the very least, we believe a robust hydrogeological survey is necessary to validate the notion that it is feasible to position two large-scale quarries in this area. We believe that using an unverified assumption to justify a preferred site selection demonstrates a reliance on circular reasoning to align with the developer's approach of using the EIA to justify the windfarm location and design rather than as an informed basis for location and design decision-making. We believe this exemplifies the developer's lack of due regard for the local area, its environment and its residents.

Groundwater risks

As residents, we know that a highly variable water table is a year-round issue at this site. In justifying their decisions about turbine location, the developer's trial pit data show that

water ingress was evidenced at just 1.4m below ground level at Trial pit 4 at the driest time of the year – in Aug 2024 (from Appendix 8A). This is just 670m from our home (fig 4).



Northwest Geotech				Site: Ballinlee Wind Farm	Trial Pit Number: TP04
Machine : 3T Komatsu Method : Trial Pit	Dimensions	Ground Level (mOD)		Client: Green Source	Job Number: 24-0772
	Location: 559730 E 636213 N	Dates: 06/08/2024		Engineer	Sheet: 1/1

Depth (m)	Sample / Tests	Water Depth (m)	Field Records	Level (mOD)	Depth (m) (Thickness)	Description	Legend	Water
					(0.20) 0.20	TOPSOIL		
					(1.00)	Soft to firm orangish brown and grey slightly sandy silty CLAY with organic material. Sand is fine to coarse		
			Seepage (1) at 1.40m.		1.20 (0.30) 1.50	Spongy dark brown amorphus PEAT.		▽1
					(1.10)	Very soft bluish grey slightly sandy slightly gravelly CLAY with low cobble and boulder content. Sand is fine to coarse. Gravel is subangular to subrounded fine to coarse.		
					2.60	Complete at 2.60m		

Figure 2: Groundwater level was at 1.4m below ground level in August 2024 (Appendix 8A)

This section of the EIAR, prepared by National Geotech (Appendix 8A) acknowledges the water problem and states that the design must factor this issue in. However, there is no evidence of the developer following this advice. Instead, they abide by their pre-determined design. This is borne out by their not considering alternatives as evidenced in Chapter 3 of the EIAR.

5.3 Groundwater

Groundwater was encountered as seepage at depths of 1.40m and 2.20m in trial pits TP04 and TP16.

Details of the individual groundwater strikes, along with any relative changes in levels as works proceeded, are presented on the exploratory hole logs for each location.

Seasonal variation in groundwater levels should also be factored into design considerations.

5

Figure 3:: Advice from National Geotech (Appendix 8A) who carried out the trial pit investigation in August 2024. The developer offers no evidence of heeding this advice.

This is what we consider to be another example of the developer's cavalier and irresponsible approach to this proposal, evidencing their lack of care for the local area, the land, the water, its nature and its residents.

Visual evidence of how water accumulates on this site is offered in the pictures below:

Figure 4: View towards the cluster of 5 turbines to the north of our home (photo taken 12th November, 2025)

Figure 5: Evidence of water table above ground level on 11th November, 2025. Photo includes our home looking towards the northern cluster of 5 turbines.

Material Contradictions Across EIAR Chapters

The unvalidated assumptions made in Chapter 3 (Alternatives) and Chapter 16 (Traffic) depend on the availability of on-site aggregate materials (via the on-site quarries). This is consistent with the developer's reactive and post-rationalising approach to the EIA and is in contradiction with good EIA practice.

For example, given that the developer's estimates of the volumes of aggregate available via the on-site quarries are unreliable, their estimation of traffic impacts during construction has to be unreliable as well. In the EIAR, they advise that HGV movements will be as follows:

Table 16-9: Proposed Construction Works Heavy Vehicle Loads

Works	Total Number of Heavy Vehicle Loads		
	Total Construction (24 months)	Peak Daily	Highest Hour
Windfarm and Substation Site Works (24 months)	11,405	142	16
Public Roads' Grid Connection Works (6 months)	6,414	42	6
Total (24 months)	17,819	142	16

Figure 6: From Chapter 16 (Material assets - Traffic & Transportation) HGV loads in total per day

As residents, we are acutely aware that each HGV load requires two movements – to arrive and depart. But furthermore, stark as the numbers as stated are, they almost certainly are a huge underestimation. This is because if the quarries aren't found on site, an extra 4,992 HGVs of aggregate will need to be imported or nearly 10,000 HGV movements.

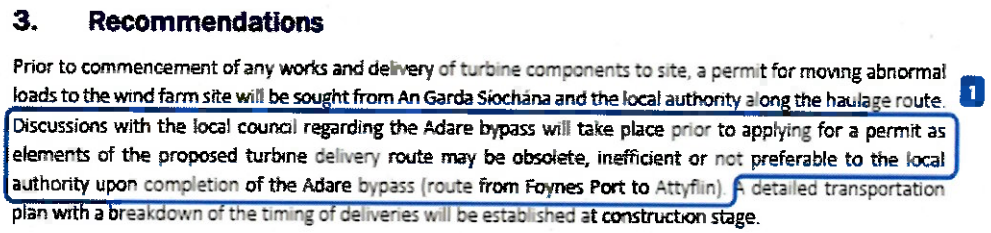
But that is not the end of it. The quarry voids are to be used as dumps for the spoils created at the turbine sites. If the voids are not available on-site, this material will need to be exported, compounding the traffic problem with up to another 10,000 truck movements. Our roads are essential to the socio-economic functioning of our community. We believe it is irresponsible and demonstrative of an absence of local knowledge to propose that our local transport network can cope with this volume of traffic.

At a minimum, the developer must be requested to consider the impact of the more plausible traffic scenarios (given the limited evidence for viable on-site quarries) and propose mitigating measures.

Incomplete Grid and Transport Assessment

The longest grid connection route (27.6 km to Killonan substation) was selected over a shorter (25 km) alternative to Limerick, with no quantitative justification. This decision carries material environmental and cost implications and was raised as an issue at the preplanning meeting with An Bord Pleanála on 20th March 2025, as recorded in the memo

of the meeting. Yet, the turbine delivery alternatives remain deferred pending the completion of the Adare Bypass. This means the project's logistical footprint is undefined. See Fig. below:



3. Recommendations

Prior to commencement of any works and delivery of turbine components to site, a permit for moving abnormal loads to the wind farm site will be sought from An Garda Síochána and the local authority along the haulage route. 1

Discussions with the local council regarding the Adare bypass will take place prior to applying for a permit as elements of the proposed turbine delivery route may be obsolete, inefficient or not preferable to the local authority upon completion of the Adare bypass (route from Foynes Port to Attyflin). A detailed transportation plan with a breakdown of the timing of deliveries will be established at construction stage.

Figure 7: Extract from Appendix 2C showing that the delivery route for heavy loads remains unknown.

Community Engagement and Social Licence (Appendix 1C)

Our household first became aware of the proposed development in late May 2025. Shortly afterwards, it became evident that contractual negotiations with our neighbouring landowners had been ongoing for years. See the developer's report on communication timelines with the community from Appendix 1C:

Date	Description of Activity
23 May	Project Website Launched www.ballinleegreenenergy.ie with contact details for the Community Team.
28 May	Advertisement published in the Limerick Leader newspaper announcing the commencement of community engagement.
30 May	All local representatives, including TDs and Councillors, were contacted in relation to the project proposals via phone and email.
30 May	Letter and Leaflet posted to households within 1km of the project.
17th – 19th June	Door-to-door visits to all residents within 1km of the project.
June & July	Additional in-person consultation at residences by request.
6th August	Invitation to Community Consultation Clinics posted to all households within 1km of the project.
26th & 27th August	Community Consultation Clinics held by appointment in the Deebert Hotel, Kilmallock, Co. Limerick.
18th September	Second Round of Community Consultation Clinics held by appointment in the Deebert Hotel.
Ongoing	Engagement with residents, community groups and local representatives in person, and via phone and email

Figure 6 Community Engagement Milestones

Figure 8: Our family first heard about this development in early June 2025 (from Appendix 1C)

This sequence undermines the credibility of the developer's claim to have conducted meaningful community engagement. The community was told nothing of the proposal until after the design of the wind farm and the contracts with the landowners were fully locked in. This can only be construed as the developer's complete misunderstanding of what community engagement actually is or their contempt for community engagement processes.

Our family had been completely blindsided by this proposal. We were shocked upon learning of the developer's fully designed and ready-to-go plan. There was no consultation or engagement worthy of the name. Instead, we were at the receiving end of a one-directional flow of information from the developer, with no possibility for our voice to matter or to accommodate what might be valuable local knowledge.

Three members of our family attended what is referenced above as the Community Consultation Clinic on August 26th. Wee experienced the clinic as a "tick-box" engagement exercise.

Sensing that the developer's inexperience in or contempt for engagement, when at the meeting, we asked their representatives on three occasions if they had engaged external professional expertise to support them with the critical task of community engagement. On the third time of asking, they acknowledged that they had not and relied solely on their own intuition as to what would work best for them in getting the project through. As one member of our family works professionally as a strategy and sustainability consultant, we were acutely aware of the developer's ineptitude, lack of know-how and their representatives' lack of confidence in this pivotal area.

This ineptitude is clearly evidenced throughout the Community Engagement Report (Appendix 1C). For example, they reference how the restriction to appointment-based clinics was '*to avoid anti-wind voices dominating.*' This reveals an approach focused on managing opposition and their own fear of and discomfort with genuine dialogue. Their record of '*hostility and safety concerns*' among staff is further evidence of a flawed and incompetent process. Their approach of blindsiding the community and leaving no allowance for community input inevitably generated high levels of community distrust.

We are deeply disappointed to have been completely excluded from what should be a community-informed initiative. The phrase "*nothing about us, without us*" is often used as a rule of thumb for sustainable development initiatives. The developer's approach signals their lack of understanding or appreciation for the fundamentals of sustainable development.

Corporate Transparency

We are particularly concerned about the developer's avoidance and lack of transparency about of the project beneficiaries. Given the the scale and impact of what the developer was proposing to impose on our local area we believe it is reasonable to ask for the developer's details and submitted a request on the 1st Aug, 2025. On the 8th of Aug 2025, the

developer's representative responded and refused to share details on the grounds of GDPR. See the email below:

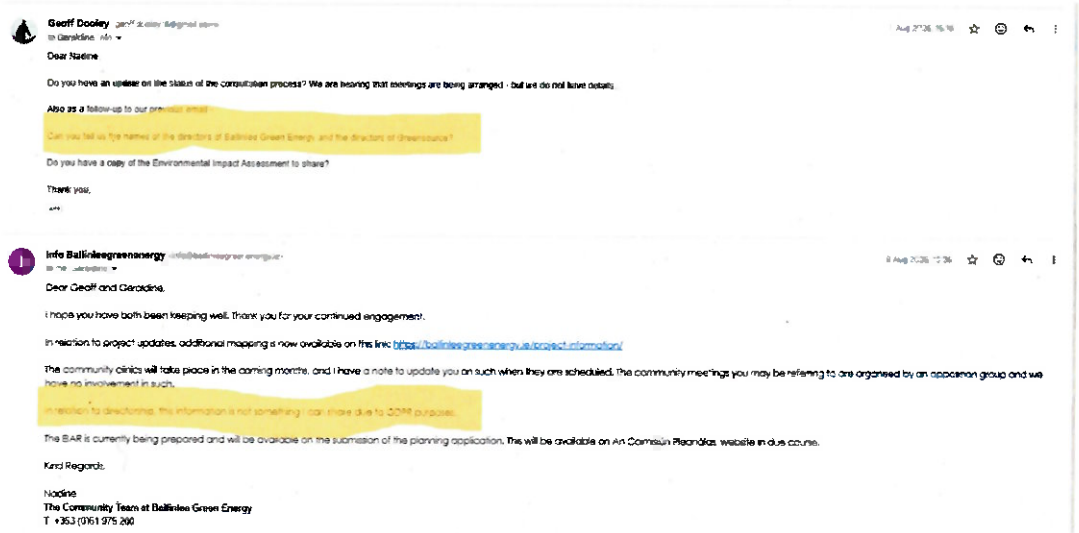


Figure 9: Email exchange with the developer's representatives in August 2025, when we were refused details of the beneficiaries of the development based on GDPR restrictions.

We challenged this reason on the basis that GDPR is not a basis for refusing to share information that is of legitimate public interest. In their response, the developer agreed but continued to refuse to share details of the project beneficiaries. See below:

Figure 10: Email exchange where the developer's representative refuses to share details of the project beneficiaries

This response is inadequate and evasive. It demonstrates a hand-off approach that we experienced as condescending and possibly contemptuous. At a minimum, we deserve to know who we are dealing with and to know who it is that wants to come into our community and utterly change our lives. Transparency about ownership and financing is a precondition for community trust and accountability. The refusal to disclose such

information highlights a pattern of opacity inconsistent with a project seeking social licence for a 35-year operational period.

Personal and Family Impact

Our home lies approximately 670m from the nearest proposed turbine and within 600m of the identified turbine delivery route. The cumulative effects on our family include: visual intrusion from up to 17turbines, loss of rural character, noise and shadow flicker impacts, and daily disruption from construction traffic. The property, partially forested for twenty years, currently holds standing surface water following heavy rain (Figs 4 & 5), evidence that the hydrological regime is already fragile and insufficiently understood. We believe that the developer has no regard for or interest in our circumstances.

Equity and Environmental Justice

This development imposes disproportionate environmental and social costs on a small rural community while exporting benefits to distant investors and financiers who prefer not to identify themselves. There is no evidence of distributive fairness or a just transition approach within this proposal.

As residents, we will bear the visual, noise, and amenity impacts for decades while the financial benefits accrue elsewhere. We see this as extractive capitalism at its worst.

What does all this mean?

Given the deficiencies identified above, we respectfully request that An Coimisiún Pleanála refuse permission for the proposed Ballinlee Wind Farm as currently presented. Should the Board determine that further consideration is warranted, we request that the applicant be required to resubmit with:

(1) verifiable on-site investigations that recognise (using local knowledge) interdependencies across soil, water and transport impacts;
(2) a competent, confident and inclusive approach to engaging with local communities, and
(3) an informed comparative assessment of alternatives.

We affirm our commitment to renewable energy and climate action that is participative, socially just, evidence-based, equitable, and grounded in good planning practice. This proposal, however, fails to meet those standards.

We are deeply disappointed that, based on this developer and this EIAR, that the prospects for sustainable development in Ireland are very low. We believe it needs to be understood that developers must model the principles and ethics of sustainable development (i.e., *development that meets the needs of the present generation without compromising the ability of future generations to meet their needs*). With their inept approach and their breach of trust that the imposition of the project represents, we believe this developer has not only let us down but is letting down Ireland's sustainable future.

We trust that the Board will give full consideration to the substantive ethical, procedural and technical deficiencies outlined in this submission.

Thank you for considering this submission.

Kind regards,

Geraldine, Geoff, Ian, Conor and Brian Dooley.