Drehid Wind Farm Planning Application

An Coimisiun Pleanala
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Eir Code Y25FF99

Tuesday 5 August 2025

Dear Sir/Madam
This is a joint submission on behalf of Val Martin of Kingscourt, Co. Cavan and myself John Dooley on the Planning Permission for Drehid Wind in Co. Kildare

Your Sincerely

John Dooley

Drehid Wind Farm Planning Application

Case reference number An Coimisiuin Pleanala 322845.Kildare Co.Co. being the Planning Authority a for wind Farm in the town lands of Coolea, Killeen, Kilmurray and Timahoe East Co.Kildare
The acceptance of this planning permission, from North Kildare Wind Farm Limited, using current Wind Energy Guidelines is ILLEGAL .The European Court of Justice has ruled, in decision C-24/19 , that the Wind Energy Guidelines are plans and programs. As set out in Directive 2001/42/EU.The Irish Wind Energy Guidelines do not HAVE An SEA.(A Strategic Environmental Assessment) Recent decisions by the Irish Courts declare Wind Turbines of the Danish Concept Design generate nuisance by their actual method of operating. The Nuisance can only cease impacting people when they cease operating.

Wind Turbine Configuration/Arrangement from the Drawings likely to be of considerable noise nuisance.

Configuration/Layout of T4,T5,T6 ,&T7 will likely cause more than significant noise nuisance as per Gibbet Hill noise nuisance legal case , being less than or equal to 1050 meters from a inhabited location(s)

Configuration/Layout of T1& T2 will likely cause more than significant noise nuisance as per Gibbet Hill noise nuisance legal case , being less than or equal to 1050 meters from a inhabited location(s)

The first indications of noise problems were published in a paper called **A Proposed Metric for Assessing the Potential of Community Annoyance from Wind Turbine Low-Frequency Noise Emissions by N D Kelley** in November 1987 . It was Presented at the **Windpower** '87 Conference and Exposition October 5-8, 1987
San Francisco, California, USA

In his introduction Kelley says

INTRODUCTION

Experience with wind turbines has shown that it is possible, under the right circumstances, for low-frequency (LF) acoustic noise radiated from the turbine rotor to interact with residential structures of nearby communities and annoy the occupants. Currently there are no universally accepted metrics or descriptors for community annoyance from low levels of LF noise. It is important from both a design and an operational perspective that the potential for such annoyance from wind turbines be quantified as much as possible. **This is not a straightforward task**, given the highly subjective nature of human response to noise in this frequency range

Kelley notes

A blade passing through the down- stream wake of the support tower or intersecting its own wake can result in repetitive, transient aerodynamic loads that can produce LF impulsive radiation that is periodic at *the blade passage frequency* (BPF).

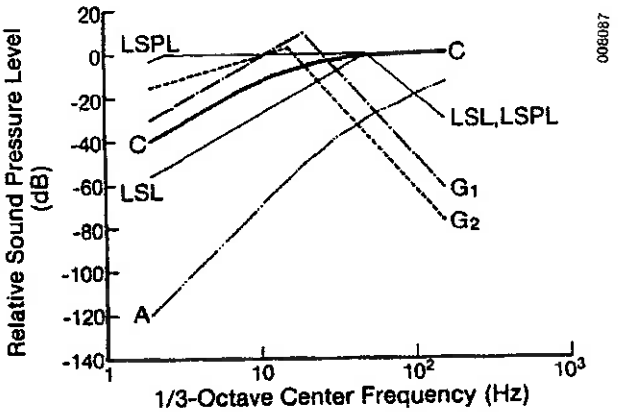

Figure 10. LOW-FREQUENCY NOISE METRICS SPECTRAL WEIGHTINGS

Figure 10 plots these weighting windows over a frequency range of 2-100 Hz. The ISO G_1 and G_2 curves have been proposed for assessing subjective human responses to acoustic noise in the infrasonic range (less than 20 Hz). The ISO/ANSI A- and (usually) C-weighting curves are standard on sound level measuring equipment. As Figure 10 shows, the C-weighting passes much lower frequencies than does the most common noise description, the A-weighting scale. The LSL and LSPL metrics have been proposed by Tokita et al. [8] for assessing residential interior environments. The LSL metric "reflects three low-frequency noise influences: structural, physiological, and psychological complaint stimuli" [8]. The LSL metric has been proposed as an appropriate descriptor for evaluating residential interior environments that contain both infra- and low-frequency audible acoustic components.

The question was asked using AI

"Dr. Neil Kelley conducted research in Boone, North Carolina, in the 1980s, which identified that wind turbines generate low-frequency noise, known as infra sound, that can cause health issues like headaches, dizziness, and sleep disturbances among nearby residents. This research highlighted the community annoyance associated with wind turbine operations and the need for better assessment metrics for such noise emissions.

In Dr. Neil Kelley's research, the wind turbines were located approximately 1.5 kilometers (about 0.93 miles) from the impacted houses. This distance was significant in assessing the effects of turbine noise on nearby residents"

The implications of granting this planning permission consent to construct this wind farm

Given recent courts decisions and this early research the ETSU-R-97 are irrelevant as the section of the Wind Energy Guidelines which measures the proposed noise impacts on people forced to live beside wind turbines.If you grant planning permission you are depriving those people living within 1 kilometer and some in excess of 1 kilometer the quiet and peaceful enjoyment of their property.

An AI response on a question on the Suitability of ETSU-R-95 noise regulations

"ETSU-R-97 is a guideline used in the UK for assessing wind turbine noise, but it has faced criticism for being based on "bad science," which may lead to inadequate noise assessments and complaints from nearby residents. **A proposed solution is to enforce a minimum separation distance of about 2 kilometers between wind turbines and residential areas to reduce noise nuisance.**"

If in future the Irish Courts accepts nuisances extends from wind turbines 2 kilometers from an inhabited residence all or most of these wind turbines will be ordered to be removed

In dealing with Infrasound Low Frequency noise the EIAR states the following"7.2.2.2 Infrasound and Low Frequency Noise

The definition of low frequency noise can vary, but it is generally accepted that low frequency noise is noise that occurs within the frequency range of 10 Hz to 160 Hz as defined in NANR45: Procedure for

assessment of low frequency noise, Salford University Report, 2011." 2011 is 14 years ago Wind Turbines have got a lot bigger since then

"Infrasound is noise occurring at frequencies below that at which sound is normally audible, i.e. at less than about 20 Hz, due to the significantly reduced sensitivity of the ear at such frequencies. In this frequency range, for sound to be perceptible, it has to be at very high amplitude and it is generally considered that when such sounds are perceptible then they can cause considerable annoyance. However, wind turbines do not produce infrasound at amplitudes capable of causing annoyance as outlined in the following paragraphs."

However the National Library of Medicine in the USA state the following

https://pmc.ncbi.nlm.nih.gov/articles/PMC9999102/

"Exposure to infrasonic (<20 Hz) and lower frequency airborne pressure waves can cause cellular and tissue damage depending on frequency, dB-level, and exposure time, while the viscoelastic properties inherent to biological tissues impart a nonlinear response to this type of acoustic stressor.[4] Widespread vascular involvement was observed in palpebral and bulbar conjunctiva and retina, gastric mucosa, liver structures, lungs, pleura and tracheae, alveoli, pericardia, and coronary arteries. The whole-body response also elicits the immune system, affects organs of the reproductive system, changes receptor cells in the vestibular semicanals and auditory cochlea, and induces genotoxic effects, including teratogenesis.[5]

At present, Infrasound and LFN (ILFN) are agents of disease that go unchecked. Vibroacoustic disease is a whole-body pathology that develops in individuals excessively exposed to ILFN. In exposure to LFN, significant problems such as depression and mental dysfunction are seen in 3% to 5% more than prevalence in general population. Other problems observed following exposure to low-frequency sound include an increase in heart rate and potentially related problems. People chronically exposed to this type of sound can develop significant health problems. Although there are thousands of articles on the relationship between hearing loss and speech intelligibility, it should be noted that not many studies have been done on the relationship between LFN exposure* and hearing loss.

Another serious consequence of ILFN exposure is the onset of mental stress, which can significantly affect all organs of the body and, more importantly, can have a considerably negative effect on the immune system. Feelings of discomfort, agitation, and restlessness when exposed to LFN have been observed in other patients, which causes people to have difficulty in daily work "and job performance. Known symptoms of ILFN include sleep disorders in various types, including changes in the quality and quantity of sleep.[6] Researchers continue to investigate the destructive effects of ILFN on human body tissues. The most important point in dealing with ILFN is the possibility of detrimental interference with biological structures (not limited to the biological structures addressed * herein). However, more studies are needed to examine how ILFN affects body tissues from a biological and pathobiological point of view

Then we have to deal with the fantastic claims that this wind farm will supply so many thousand houses

in County Kildare and surrounding counties with cheap reliable energy and reduce CO2 for so many years.

Research in "**Two methods for estimating limits to large-scale wind power generation Lee M. Miller[a,1], Nathaniel A. Brunsell[b], David B. Mechem[b], Fabian Gans[a], Andrew J. Monaghan[c], Robert Vautard[d], David W. Keith[e], and Axel Kleidon** " quantifies the density limitations of wind turbines . Limitations on the planned installed capacity in a particular area are important as when you exceed the density discussed in the research the actual output of the planned and installed wind turbines can drop by as much as 80% . The amount of kinetic energy in the wind can drop from 5 watts per M^{-2}(per meter squared) to less than 1 watts per M^{-2}(per meter squared) an 80% drop in the supply of raw material.Machines are mechanical, electrical, hydraulic etc powered devices that add value to raw material. But as everybody knows that the faster they operate with a supply of raw material the more they produce and assuming you have customers for the product and can sell the product at a price greater than the cost of production the greater the profit you make.However no matter how much you dream ,propagandize and say what ever you like you cannot increase production as your supply of raw material declines. Research by **Johns Hopkins and the Katholic University Louvain** recommends that the separation for Wind Turbines with hubs greater than **300Ft(91.407 meters)** should be separated from one another by 15 times the hub diameter. 150 Meter hub diameter Hub Diameter wind turbines should be separated by 2.025 kilometers. This not the case here there the output loss for each of the down wind turbines will be **35%**..It is likely that **Cloncreen** Wind Farm over near **Clonbulloge** will impact the output of this wind turbine. **The Texas Technology University Doppler Radar Studies** show extended Wind Wake in certain wind conditions. Claims by the Government and others that renewables , the largest capacity it/or will be installed which is wind generation, are cheap and the grid penetration of 80% is achievable are laughable . All they need to do to complete their energy circus is wear Red Noses and Baggy Trousers when making speeches about their "wonderful wind program" and the Climate Emergency. So claims that wind Turbine generation of electricity reduce emissions are NOT true. As are claims that a wind farm will supply electricity to thousands of houses. All of which is mathematically unproven.

Actual. Output likely to be achieved based on actual Grid Performance

The installed Irish Grid of close to 4000MW during the years 2018 and 2019 on 50 occasions produced 0(Zero) output therefore the whole Irish Grid supplied ZERO HOUSES, on 2022 occasions produced <=50MW, on 2022 occasions, produced 2798<=100MW, on 2914 occasions <=150MW, 2747 occasions produced <=200MW. Therefore on 50 occasions supplied Zero Houses, for 505.5 hrs or .0577 yrs it supplied , the whole grid, supplied from zero to ,10 houses . For .08338years the whole grid supplied between 10 and 20 Houses. For .0783 years the whole Irish grid supplied between 20 and 30 houses for .0783 years (The Whole installed wind capacity) supplied between 30 and 40 houses. From actual data supplied by Eirgrid . There is zero probability that wind energy will supply "up to 80% of electricity " onto the grid. Based on Grid ACTUAL PERFORMANCE claims that this wind farms will supply so many thousand houses are ABSURD.

Then there is the issue of EU Law.

In 2020 the ECJ released judgement C-24/19 which stated that wind energy guidelines are plans and programs as set out in Directive 2001/42/EU. As such ,The Wind Energy Guidelines, Legally Require a Strategic Environmental Assessment . The Irish Wind Energy Guidelines are almost identical to the Flanders Wind Energy Guidelines on which the ECJ decision,C-24/19 , was made. The ECJ Decided that wind energy guidelines are PLANS and Programs as set out in DIRECTIVE 2001/42 /EU . Therefore legally require A STRATEGIC ENVIRONMENTAL ASSESSMENT Any upgrade of these can only be effected by A STRATEGIC ENVIRONMENTAL ASSESSMENT. No other procedure is legally valid. Currently the Irish Wind Energy Guidelines DO NOT HAVE A STRATEGIC ENVIRONMENTAL ASSESSMENT.

Issues in Relation to wind turbine COMPLIANCE with The Machinery Directive

"The Regulation of Machinery Standards in Europe.

The Machinery Directive was introduced in 2006 and amended in 2009. According to the EU

Commission and wind turbines are machines to which it applies .

In answer E-005937/ 2015 from the EU Commission to a question from Mairead McGuinness MEP. The Commission said that "Wind turbines are considered machines to which the Machinery Directive 2006/42/ ec applies"

Extract from The Machinery Directive

"(2) The machinery sector is an important part of the engineering industry and is one of the industrial mainstays of the
Community economy. The social cost of the large number of accidents caused directly by the use of machinery can be

reduced by inherently safe design and construction of
machinery and by proper installation and maintenance.
(3) Member States are responsible for ensuring the health and safety on their territory of persons, in particular of workers and
consumers and, where appropriate, of domestic animals and
goods, notably in relation to the risks arising out of the use of
machinery.

The opinion of the States haverikommission in relation to wind turbine compliance with Machinery Directive.

"2.2 Design and construction
A wind turbine and all its parts are to be regarded as a machine. This means that the rules resulting from the so-called " The machine directive applies to the construction. The manufacturer allowed an external party to review and certify the turbine type and tower height used in Lemnhult. This process followed an international standard, IEC 61400-22.

However, the standard is not harmonized with the Machinery Directive, which means that the fact that a machine is certified according to the stan- dard does not indicate that all requirements of the Machinery Directive are met."(Google translation from report)

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The opinion of the ARBETSMILJO VERKET in relation to wind turbine compliance with the Machinery Directive

"There is no harmonized C standard for wind turbines that gives the presumption of machine directive. A harmonized standard must be published in the Official Journal of the European Union for its presumption
Compliance with the current Directive in the parts covered by the Standard (Machine Directive 2006/42 / EC in this case), see Section 9 of the Machine Requirements

A standard referred to by many manufacturers is EN 50308, Wind Power Plant - Safety and Protection in Care and Maintenance. The standard is not published in the Official

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Journal of the European Union (according to search 2016-09-09) and can not therefore be expected to comply with the applicable rules of the machine regulations "

It can be seen from the above both investigations carried out by Swedish authorized bodies that wind turbines ,which the EU Commission classifies Machines. Are not compliant with the Machinery Directive.

Granting this likely failed production unit planning permission will certainly cause multiple families to abandon their houses because nuisance. If they want to access their homes after they are forced to abandon by low frequency noise and infrasound, noise which is at or below, the threshold of hearing, will be after they have got a court to close down the offending machines. Which in this case will 90+% of the whole wind. After the farmers on whose lands these sources of nuisance operate from are forced to pay significant damages to because of your decision to grant planning permission. Plus of course the wind energy company. Whose reason for building it is their delusional belief that CO2 causes the climate to change .

Submission on an EIA Project by Val Martin, Drumsallagh, Kingscour, Co Cavan a farmer. Contact person is John Dooley who has agreed to allow this submission to be submitted jointly with his. I intend this submission to permit me to take a Judicial Review against the decision of the Commission.

Drehid Wind Farm Planning Application

Name of Project: Drehid Wind Farm.
Reference Number of application: Coimisiuin 322845
Applicant's name as per planning Application form:Coolea, Killeen, Kilmurrray and Timahoe East Co.Kildare

Fee Enclosed:

Recommendation: I recommend this application be marked invalid and if not that it be refused for the reasons given.

Reason 1. This wind farm is to be funded and remunerated under the Irish Government's Renewable Energy Plans or Programmes for energy which requires an Environmental Report under EU Directive 2001/42/EU as amended which sets the framework for projects submitted under Directive 2011/92/EU (EIA Directive), the Habitats Directive and the Pollution Directive. There is no copy of an Environmental Report which renders the EIA, AA and Pollution control documents invalid.

Reason 2.

The Commission must decide and state what it considers the status of the Wind Energy Guidelines to be? Are they made and compliant with Directive 2002/42/EC or not? I know the SEA Directive was never complied with during their compilation. This appears to mean that the Guidelines conflict with the law or else they predate the implementation of their introduction which was in 2004 with a 24 month extension if it commenced prior to the introduction date in Directive 435/ 2004 introduced on the 14th July 2004. The 24 month extension period expired on the 14th July 2006 and as no guidelines were enacted since the 2006 Guidelines are out of date.

If the Commission insisted the Guidelines comply with the law then it must take into account page 34 thereof. These specify the spacing of turbines in relation to the prevailing wind which is to the south west. i/ e. from Limerick at that location. 3 turbine blade diameters in the cross wind direction and seven in the (Para 5.13). The EIAR must clarify this clearly stating if it complies.

Reason 3. The Birds Directive and the Wildlife Act 1976 as amended forbids the killing or taking of a protected wild bird for any reason including accident. This wind farm will kill such birds which is a criminal offence under the Act and must be refused.

Reason 4. The applicant must state what this wind farm is intended to do? There is 4,000 megawatt of wind farms in the Republic while at the same time there is 6,000 megawatts of conventional fossil fuel generation. This was 5,500 megawatts of conventional generation back in 1990 when there were no wind farms. The applicant should be asked to explain why no fossil fuel generation was ever shut down. Further the Minister for Energy ordered 11 million Euros of Diesel engines to keep the lights on when the wind is calm. There is a lot more conventional plant now than when there was no wind farms at all. This reflects in the retail price of electricity which amounts to 70 cent per unit (kWh) at some Dublin apartments. One quarter of bill payers are in arrears. Claims that this wind farm will reduce the price of electricity are

untrue. The applicant should clarify how the contribution is measured.
It is by Capacity Credit, that is the amount of conventional which can be turned off and replaced by wind without endangering supply. Claims that wind farm reduce fossil fuel are false. In fact when counted over one year they are net consumers of electricity.

I will help the community take a Judicial Review to stop this project. Val Martin 30th July 2025.