Colm Wright
Ormand Flying Club, Birr Aerodrome (ICAO: EIBR),
Birr Airfield,
Roscrea Road
Crinkle,
Birr,
Co. Offaly

21/06/2026

Ref: ACP SID PAX92.324279 – Proposed Ballincor Wind Farm Development

Dear Sir/Madam,

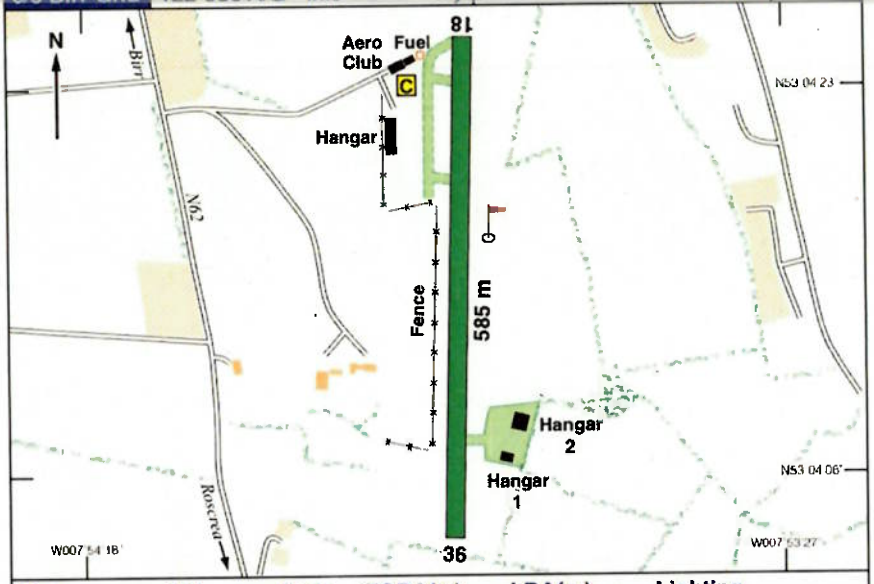
This submission is made in response to the proposed wind farm development and associated infrastructure planned for our local area. It sets out the history and context of our Flying Club, documents the failures in the Applicant RWE's consultation process, details our current operations, and presents our concerns regarding the proposed development. We respectfully request that An Coimisiún Pleanála refuse permission for the proposed development on aviation safety, operational, and procedural grounds, having regard to the serious concerns outlined in this submission.

1. History and Context

Ormand Flying Club has operated from Birr Aerodrome (official designation EIBR under the International Civil Aviation Organisation) for over fifty years. The airfield is located approximately one nautical mile south of Birr, County Offaly, and is licensed by the Irish Aviation Authority. The club holds Designated Training Organisation status, also granted by the Irish Aviation Authority and trains pilots to Private Pilot Licence standard in accordance with EASA (European Aviation Safety Agency) regulations. This is the Pooleys Plate – Aerodrome Chart for Birr. EIBR is the identifier for Birr Aerodrome.

EIBR

N53 04.25 W007 53.92	**BIRR**	250 ft AMSL
1 nm S of Birr. ///cons.unfed.introduces		**SHA 113·30 063 41·6**
c/s Birr Gnd	122·950 A/G - Information only	Shannon ATIS 130·955 H24



Rwy	Dim(m)	Surface	TORA(m)	LDA(m)	Lighting
18/36	585x18	Grass	18-585 36-585	18-585 36-585	Nil Nil

Op hrs: PPR. SR-SS. VFR conditions only.

Landing Fee: Nil. **Customs:** Nil. **Maintenance:** Nil.

Hangarage: Members only. Apron overnight parking available subject to PPR.

Remarks: Operated by the Ormand Flying Club Ltd., Streamstown, Roscrea, Co. Tipperary.
Light aircraft welcome, but strictly PPR.
Flight Training 7 days a week.

Caution: Electric fence 30m west side of runway centre line.

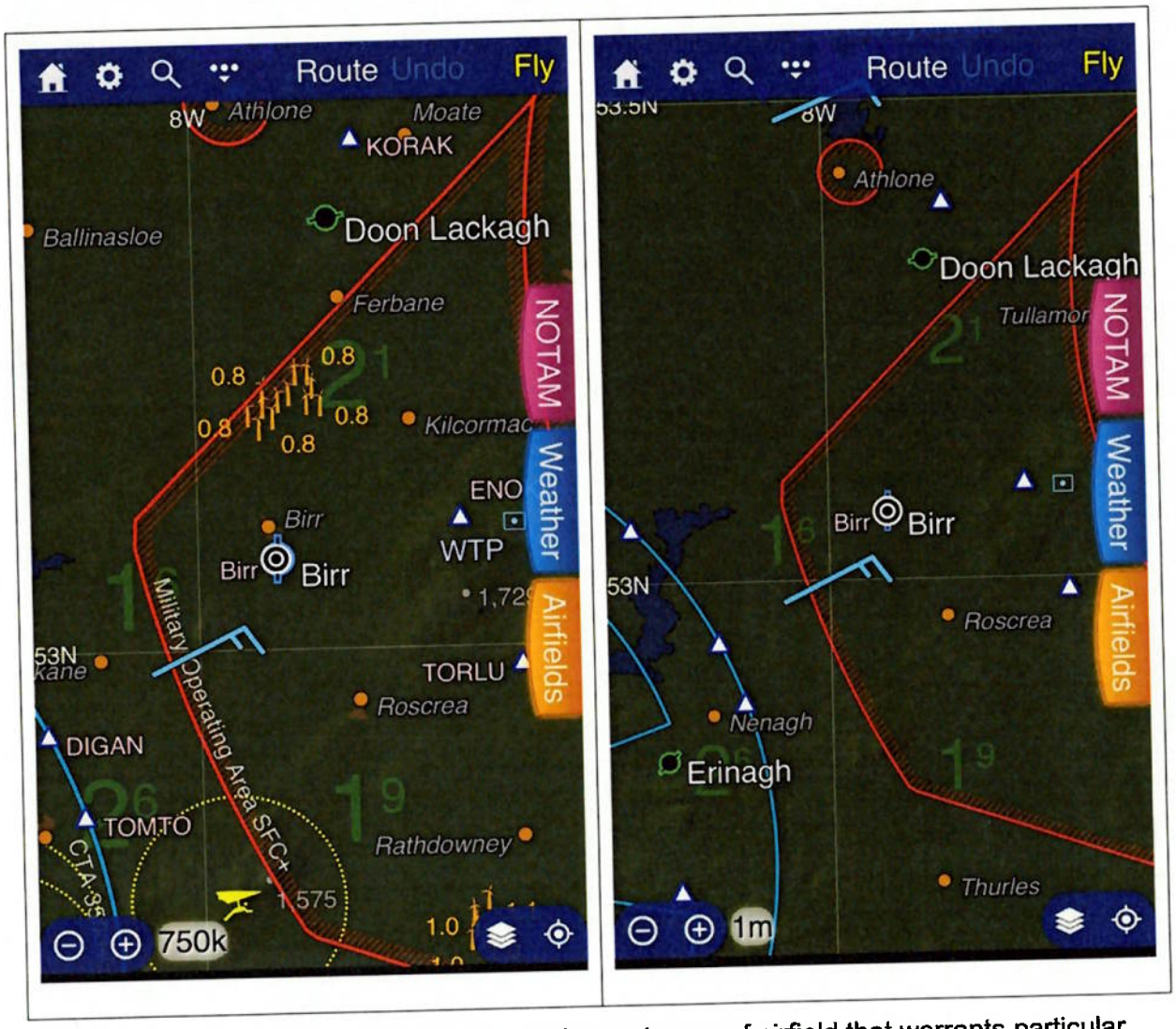
Restaurant: County Arms Hotel 1 mile from airfield, Tel: 00 353 (0)57 912 0791.
The Thatch, Crinkill, 0.5 miles from airfield, Tel: 00 353 (0)57 912 0682.
Accommodation: Minnocks B&B, Tel: 00 353 (0)57 912 0591.
County Arms Hotel, Tel: 00 353 (0)57 912 0791.
Dooly's Hotel, Tel: 00 353 (0)57 912 0032.
Taxis: Tel: 00 353 (0)57 912 0407, 00353 (0)87 666 1420.

Fuel: 100LL, MOGAS. By prior arrangement. Self serve and payment by credit card.	**Tel:** 00 353 (0)57 912 1300 Airfield **Tel:** 00 353 (0)87 669 2248 David **Tel:** 00 353 (0)87 0664545 Colm **Email:** info@ormandflyingclub.ie **Website:** www.ormandflyingclub.ie

Robert Pooley © 59 2025

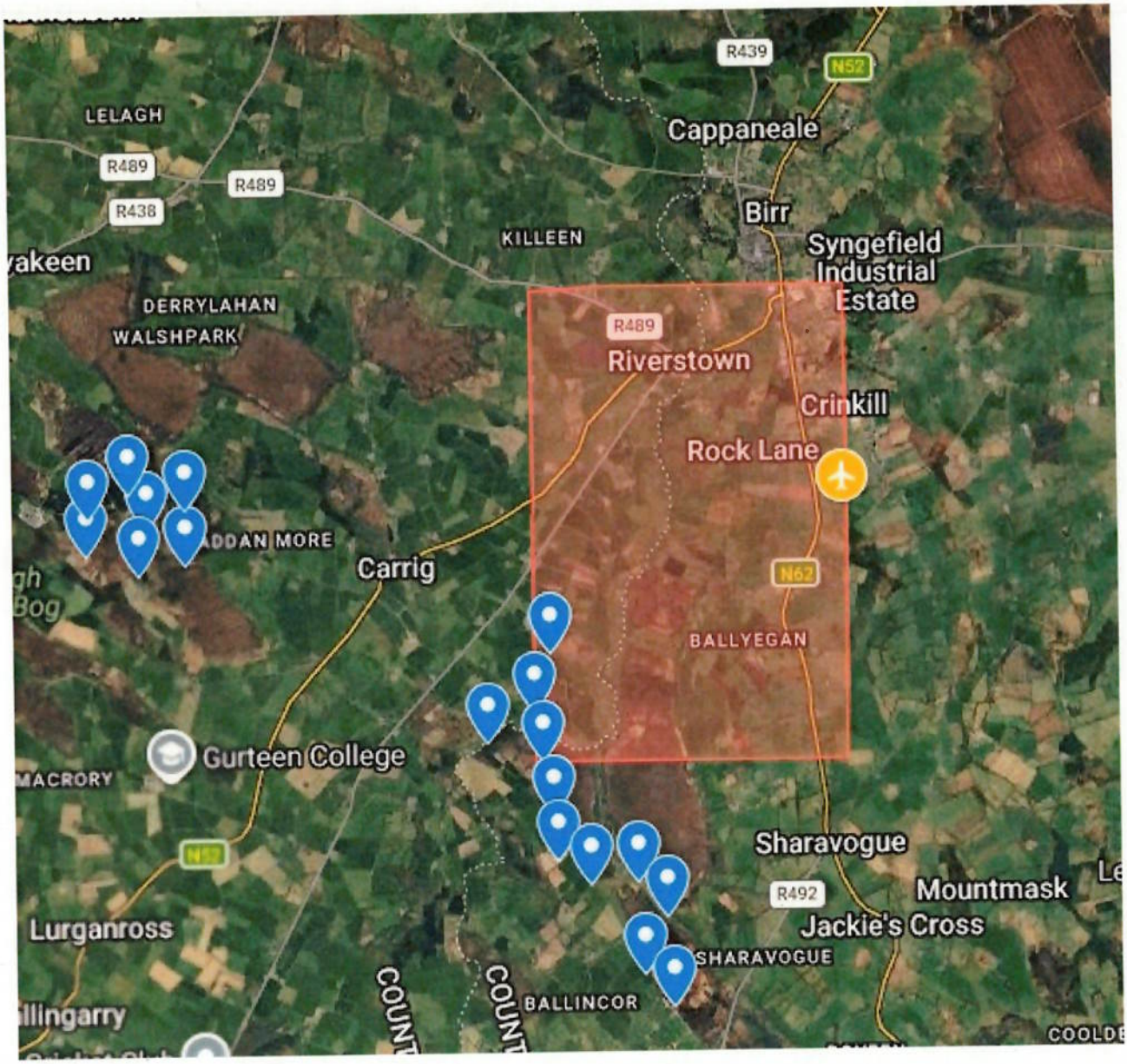
The airfield operates a single grass runway orientated north–south (designated 18/36), approximately 585 metres in length, at an elevation of approximately 250 feet above mean sea level. Operations are conducted under Visual Flight Rules only. There is no air traffic control service thus separation from other traffic and obstacles is achieved by pilots through visual reference and situational awareness. This is the standard operating model for general aviation training aerodromes throughout Ireland.

The club is widely regarded as the oldest grass-runway flying club in Ireland. Its activities include pilot training, skydiving operations, recreational flying by members and visiting pilots, regular fly-in events and airshows that attract attendance from across Ireland. The aerodrome has been used for helicopter emergency and rescue services when responding to tasks in the local area and operates within a designated Military Defence Operating Area (see MOA5 Military Operating Area 5 map below).



These characteristics place Birr Aerodrome in a category of airfield that warrants particular consideration in any planning process involving tall structures in the surrounding area. The proposed Ballincor WindFarm development, if permitted, would introduce structures of approximately 180 metres or greater in overall tip height within airspace that is routinely and necessarily used by aircraft operating from Birr Aerodrome.

The map below illustrates the aerodrome traffic circuit area utilised for training operations at Birr Aerodrome. Please note the proximity and overlap with the proposed wind farm development. Turbine 1 is estimated at a distance of 3.8km / 2 nautical miles away, Turbine 2 and Turbine 4 are also likely to directly overlap with our training and traffic circuit area.



The points set out in this submission are grounded in aviation safety, procedural compliance, and the long-term viability of a licensed aviation facility that serves the midland region.

2. Failure of Consultation

According to ACP official records (ABP318666-23) a pre-application consultation meeting was held between RWE representatives and ACP on February 22nd 2024. The matter of the Airfield was raised by the ACP Board where they noted the sites proximity to the Airfield and the need for RWE to consider this in the proposal and submission. See below.

- The Boards representatives discussed the location of the proposed site and asked the prospective applicant if they have assessed wind speeds and has this been taken into consideration in the proposed turbine layout. The prospective applicant stated that they have had wind monitoring devices on site for over 2 years and have been monitoring data collected.

- The Boards representatives pointed out the presence of an airfield located northeast of the proposed development site. They questioned if this airfield is still in operation. The prospective applicant stated that they will take the airfield into account in their assessment.

- The Boards representatives noted the presence of peat on the subject site and stressed the importance that a robust assessment of peat stability be carried out as this could be a significant issue. This issue should be comprehensively addressed in the environmental impact assessment report. The prospective applicant stated that although peat partly overlies the proposed site, there is only one single turbine that will be located on peat. All other turbines will be located on lands currently occupied by forestry, notwithstanding this, the applicant will carry on a robust peat stability risk assessment for this turbine.

A second meeting occurred with ACP on May 7th 2025 where RWE claims "Birr Airfield is located outside of their zone of influence". See below. They also advised that they had consulted with the Airfield and provided a layout of proposed turbine locations.

- Following on from a point raised by the Board's representatives, the prospective applicant advised that the proposed development is located approx. 3km from the Birr Airfield and is located outside of their zone of influence. They also advised that they have consulted with the Airfield and provided them with a layout of the proposed turbine locations.

- The Board's representatives noted that it would appear from the [illegible]

Ormand Flying Club did receive two emails from RWE dated February 14th 2025 and March 19th, 2025 (see below). The subject line in **both** reads RWE Consultation on **Arbourhill, Tipperary WindFarm Proposal.**

From: [redacted]
Sent: 14 February 2025 10:48
To: info@ormandflyingclub.ie <info@ormandflyingclub.ie>
Cc: [redacted]
Subject: RWE Renewables Ireland Ltd. - Consultation on Arbourhill, Tipperary Wind Farm Proposal

To whom it may concern,

We are writing to you on behalf of RWE Renewables Ireland Ltd. to consult on a wind farm proposal at a site in north County Tipperary. Please find attached information outlining the location and current plans. At this stage we are seeking to identify any potential issues or constraints that we should be aware of as we progress the design of the wind farm and supporting infrastructure.

We would welcome any feedback or information you may wish to share at your earliest convenience.

Best regards,
[redacted]

From: [redacted]
Date: Wed 19 Mar 2025 at 11:31
Subject: Re: RWE Renewables Ireland Ltd. - Consultation on Arbourhill, Tipperary Wind Farm Proposal
To: info@ormandflyingclub.ie <info@ormandflyingclub.ie>
Cc: [redacted]

To whom it may concern,

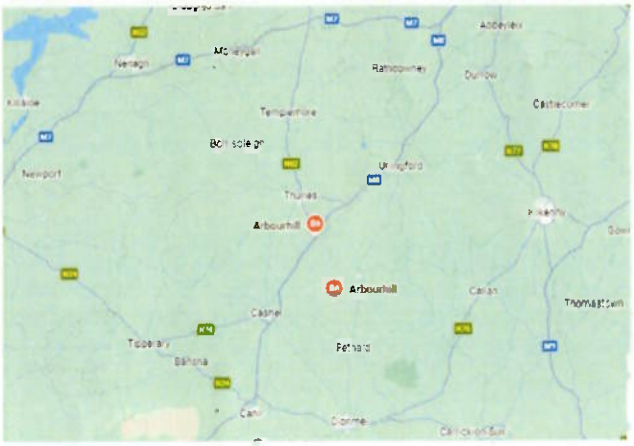
I am just following up on the below and attached. Please also note that in their response to our email, the IAA suggested direct engagement with yourselves to ensure you were aware of the plans given that you are the nearest aerodrome to the proposed wind farm site.

If there is anything you wish to raise as a potential issue, please don't hesitate to get in touch.

Best regards,

[redacted]

There are a number of Townlands in Co. Tipperary named Arbourhill (see below) but none have a direct impact on Birr Airfield.



An email exchange between Officers in Ormand Flying Club determined that these locations are a substantial distance from Birr Airfield and deemed it not relevant. No further communication occurred.

A review of Appendix 1-3 Consultee Responses in the RWE Application files includes two separate interactions between RWE and the Irish Aviation Authority. In both the IAA requested that Birr Airfield and Ormand Flying Club be contacted directly about the Ballincor Windfarm proposal. See below:

RE: EIA Scoping for Ballincor Wind Farm

From Christophe O'BRIEN <Christophe O[redacted]>
Date Fri 4/5/2024 12:05 PM
To Ryan O'Toole <[redacted]>
Cc John Dillon <[redacted]>

You don't often get email from christophe o[redacted] Learn why this is important

CAUTION: This email originated from outside of the organisation. Do not click links, open attachments or scan QR codes unless you recognise the sender and know the content is safe. Forward unusual emails to [redacted] for verification.

Good afternoon Ryan,

Thank you for your email and the information provided in relation to the proposed Ballincor WF in Co. Offaly.

Having reviewed the coordinates you have provided, it appears that the proposed site is approximately 5kms South West of the licensed Aerodrome – Birr Airfield in Co. Offaly.

As such, we would request that you engage directly with the Aerodrome licensee as part of your consultation process.

Contact details for Birr Aerodrome are as follows:

https://ormandflyingclub.ie/

Birr Airfield,
Birr,
Co.Offaly
Phone:[redacted]
[redacted]

Should a formal planning application be submitted, the Irish Aviation Authority will likely offer the following general observations:

There are 4 critical points to be made here:

1. The explicit direction at different stages of the process from both An Comisiuin Pleanala and the Irish Aviation Authority to engage directly with Ormand Flying Club **must** require RWE to do more than send an email late in the process.

2. The RWE statement in the second meeting that the development is **outside** the Airfields 'zone of influence' is wholly inaccurate as will be shown in Section 4 and reflects the lack of consultation this submission underlines.

3. Any correspondence seen by Officers of the Club relates to **a different windfarm in a different area**. The email:

    - references the **wrong** development site;
    - is not included within the applicant's Consultees documentation, meaning it's content cannot be independently verified;
    - was not followed up by any telephone contact, site visit, or meeting;
    - may, in any event, have been directed to a general or outdated email address and never received.

4. **No direct contact** was made. This constitutes a serious and fundamental failure, denying a licensed aviation facility the opportunity to engage meaningfully at the appropriate stage of the planning process.

As a direct result of this failure, Birr Aerodrome was unable to engage at the pre-application or Environmental Impact Assessment stage, was unable to provide operational data that would have informed the assessment and has been unable to participate meaningfully in a process that directly affects the safety of its operations. This submission is accordingly made without the benefit of a technical dialogue with the applicant that should have occurred before this stage.

3. Operations of Birr Aerodrome and Ormand Flying Club

Flight Training

Ormand Flying Club operates as a Designated Training Organisation approved by the Irish Aviation Authority and delivers Private Pilot Licence training to EASA standards. Demand for training has grown to the point that additional flight instructors have been engaged. Training activity includes:

- solo and dual circuit flying, with repeated low-level approaches and departures in the immediate vicinity of the aerodrome;
- local area navigation exercises using known ground features as visual reference points;
- cross-country training flights across the midland region;

- trial and introductory flights, which are frequently a member of the public's first experience of light aircraft.

General Flying and Club Activity

The aerodrome is active on a year-round basis, with daily operations the norm outside the winter months of November, December, and January. Activity includes member recreational flying, visiting aircraft, and cross-country arrivals from other Irish aerodromes. The aerodrome holds both AVGAS and MOGAS fuel, making it a practical transit stop for general aviation traffic across the Irish midlands.

Expanding Operations — Skydiving Partnership

EIBR has been the base of skydiving operations over the years and in more recent times up until 2016. In early 2026, a partnership agreement has been concluded with a skydiving operator, with operations scheduled to commence in Summer 2026. Parachute operations will introduce a significantly different and more complex dimension to the airspace around the aerodrome. Aircraft will climb to drop altitude and release jumpers who will descend under canopy over an extended area. Any obstacle that reduces the safe drop zone or the ability to plan reliable flight paths to and from altitude may directly compromise this operation.

Economic and Community Value

The airfield generates tangible economic and social benefit for the local area. The Annual Breakfast Fly-In has raised in excess of €15,000 annually for the Birr branch of St Vincent De Paul and draws aircraft from aerodromes across Ireland and UK. Multiple additional fly-in events are held annually. Airshows held at the site attract significant public attendance. The Annual Birr Vintage week Airshow is a staple in the calendar and attracts enormous crowds every year. In addition, the aerodrome hosts visits from school groups and Scouting organisations providing educational access to aviation for young people in the region.

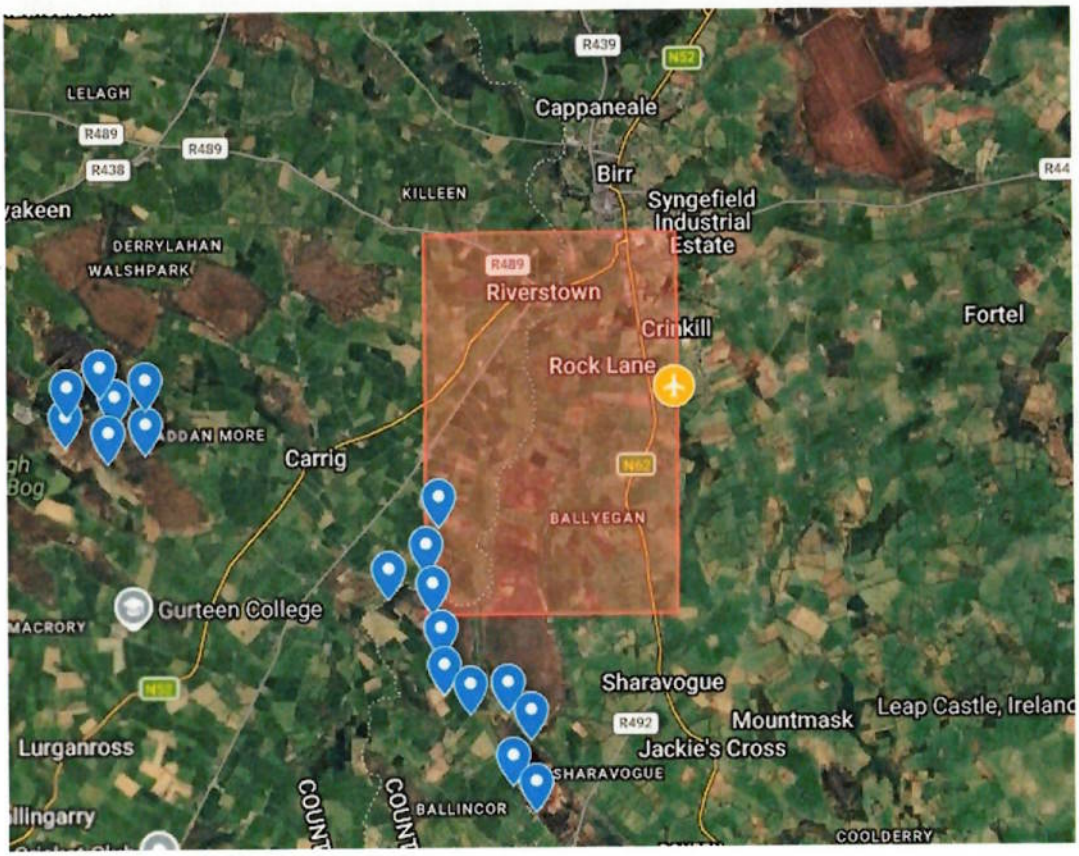
These activities are not incidental. They represent the visible output of a licensed aerodrome that has served its community for over five decades and is actively growing. Any development that degrades the safety or operational capability of Birr Aerodrome affects not just the club but the broader community that engages with it.

4. Concerns Regarding the Proposed Development

Circuit Flying and Obstacle Clearance

Training circuit flying is conducted at a standard circuit height of 800 feet above ground level around Birr Aerodrome. This is consistent with Irish general aviation practice and is the operationally appropriate height for a runway of this length and type. The standardised rules of the air SERA.5005(f) require aircraft to maintain a minimum clearance of 500 feet above any obstacle over which they fly. However, 800 feet above ground level is the circuit height, not a height selected with reference to obstacles; it is the standard for safe circuit operations.

Wind turbines of approximately 180 metres tip height — equivalent to approximately 590 feet — would place blade tips at a height that, with the required 500-foot clearance, would demand circuit altitudes in excess of 1,090 feet above ground level in the affected sector. This is not operationally compatible with standard training circuit procedures at Birr Aerodrome. The map below illustrates the aerodrome traffic circuit area utilised for training operations at Birr Aerodrome. Please note the proximity and overlap with the proposed wind farm development - T1 a distance of 3.8km / 2 nautical miles away.



The circuit cannot simply be 'moved'. It is defined by actual wind conditions, the runway orientation, the traffic pattern geometry and the requirement to maintain controlled flight throughout.

Student Pilot Altitude Deviation

A critical and often underappreciated consideration in training environment assessments is the performance envelope of the student pilot, not the qualified one. A student pilot in the early stages of training may deviate from their assigned circuit altitude by plus or minus 200 feet. This is not negligence; it is the expected variation during the learning process and the reason that 'height-holding' is a core assessed skill. Instructors are trained to manage and correct these deviations.

The consequence of this operational reality is that an aircraft intending to fly at 800 feet above ground level may, at a given moment, be at 600 feet. At that height, in the sector occupied by the proposed turbines, the clearance above a 590-foot tip is a matter of tens of feet. This is not a theoretical risk; it is a foreseeable scenario that arises in the normal course of training operations. The proposed development would introduce a permanent obstacle into airspace where this scenario occurs routinely.

Prevailing Wind and Approach Geometry

Runway 18/36 is aligned north–south. Aircraft take off and land into wind; under prevailing westerly / north-westerly conditions, the active runway and the base and final approach legs of the circuit will be oriented to bring aircraft over or in close proximity to the area in which the proposed turbines are sited. The Ballincor approach sector, identified in the map, is assessed as the more frequently used approach path under typical wind conditions in this part of the midlands.

The implication is that the conflict between circuit traffic and the proposed turbines would not be an occasional or exceptional event. It would be a routine feature of operations under the most common meteorological conditions.

Visual Navigation, Landmark Reliance and Turbulence

General aviation training at uncontrolled aerodromes is fundamentally dependent on VFR rules and visual navigation using clear and recognisable ground features. The River Brosna corridor serves as a **primary visual reference line** for local training flights operating to and from Birr Aerodrome. This is consistent with standard practice at rural training aerodromes, where linear features such as rivers provide unambiguous orientation, positional awareness, and circuit alignment. The introduction of large-scale turbine structures into this corridor would fundamentally alter that visual environment. Turbines of this scale would:

- Compromise the clarity of the river as a navigation reference

- Introduce significant vertical elements that compete visually with the underlying landscape
- Create visual distraction and increase pilot workload, particularly for student pilots still developing situational awareness

In a training context, where pilots are required to maintain aircraft control, monitor altitude, and navigate visually, the introduction of multiple large moving structures (rotating blades) within a primary reference corridor creates a material risk of confusion and misjudgement of position.

In addition the turbines would create a significant physical obstacle hazard and generate mechanical turbulence and wake effects in their lee. Under moderate to strong wind conditions, turbulent wake extending downwind of turbines of approximately 180 metres in height can persist for several rotor diameters — potentially several hundred metres — at altitudes consistent with general aviation training flight.

For a student pilot operating a light training aircraft, the combination of:

- Reduced clarity of visual reference points
- Increased cognitive workload
- Unexpected turbulence in proximity to terrain and obstacles

represents a **serious and unacceptable safety risk** within an established training environment.

Uncontrolled Airspace and the Absence of Radar Separation

Birr Aerodrome operates in class G uncontrolled airspace. There is no radar service and no air traffic control providing separation. Pilots are responsible for their own separation including terrain and obstacle avoidance using visual reference. In controlled airspace, a controller may alert a pilot to a conflicting obstacle or traffic; here, no such safety net exists.

This is precisely why wind turbines in the vicinity of uncontrolled general aviation aerodromes and particularly within the circuit pattern require careful scrutiny. The margin for error is carried entirely by the pilot. Introducing dominant obstacles into routinely used training airspace removes margin that, in a controlled environment, might be recoverable. At an uncontrolled aerodrome, it is not.

Emergency Services and Military Operations

Birr Aerodrome is situated within a designated Military Defence Operating Area. The airfield is referenced in Pooley's flight guide and identified in relevant navigation plates for the midland region.

The aerodrome has served and continues to serve as a base for helicopter emergency and rescue service operations. These activities involve low-level flight by aircraft under operational pressure, often in degraded weather conditions.

Introducing large obstacles into the area used for such operations demands specific and detailed assessment. We are not aware that the implications for helicopter rescue operations or military activity in this area have been adequately considered or addressed in the applicant's submission.

Aviation Lighting, Distraction, and Night Environment

Operations at EIBR take place within day Visual Flight Rules hours — from 30 minutes before sunrise to 30 minutes after sunset. In practice, this means flights regularly occur in the low-sun conditions of early morning and evening, when glare, shadow, and reduced contrast affect a pilot's ability to identify and judge distance to obstacles. Turbines of this height are required to carry aviation warning lighting and in an area currently free of tall structures, the introduction of multiple flashing red obstruction lights alters the visual environment during these marginal daylight periods. The concern is not night operations — the aerodrome does not conduct them — but the degraded visibility at the edges of the operating day when a clear, uncluttered visual horizon matters most. This is an operational consideration that has not been addressed in the applicant's submission.

5. Conclusion and Relief Sought

Ormand Flying Club and Birr Aerodrome submit that the proposed wind energy development as currently described presents unacceptable risks to aviation safety in the vicinity of a licensed, active, and growing aerodrome. The concerns raised in this objection arise from the documented operational characteristics of the aerodrome, the known flight envelope of student pilots in training, the geometry of the standard circuit pattern, and the physical dimensions of the proposed turbines.

The failure of the applicant to engage meaningfully with the aerodrome means that these concerns have not been considered, tested, or addressed at any stage of the application process. This is a material deficiency in the application.

Ormand Flying Club respectfully requests that the Board:

- refuse permission for the proposed development on aviation safety grounds as elaborated in this submission;
- note the inadequacy of the consultation conducted by the applicant in respect of this licensed aerodrome and require that any resubmission demonstrate direct, documented, and substantive engagement with Ormand Flying Club and Birr Aerodrome prior to lodgement;
- have regard to the planned expansion of aerodrome operations, including the imminent commencement of parachute operations, as material evidence of a growing and economically active facility whose long-term interests must be weighed in the planning balance.

Chairperson Ormand Flying Club