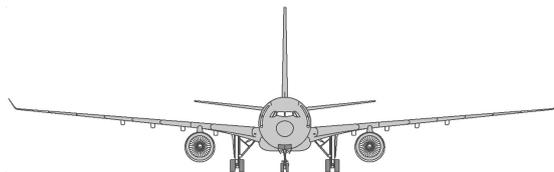


RECEIVED: 04/12/2024

**AVIATION ANALYSIS REPORT  
RE  
PROPOSED WIND FARM  
NEAR  
KELLYSTOWN, COUNTY LOUTH**

**FOR  
EDF RENEWABLES IRELAND LTD.**

28<sup>TH</sup> JUNE 2024



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**O ' D W Y E R   &   J O N E S   D E S I G N   P A R T N E R S H I P  
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*Note: In all maps /diagrams /aerial photos in this report which do not contain a North Point, north lies to the top.*

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## 1. Scope of this Report

1.1 This report, for EDF Renewables Ireland Ltd., assesses aviation-related aspects of a proposed Wind Farm to the south-east of Dunleer in County Louth, on which five wind turbines are proposed.

## 2. Outline Description of the Site and of the Turbines

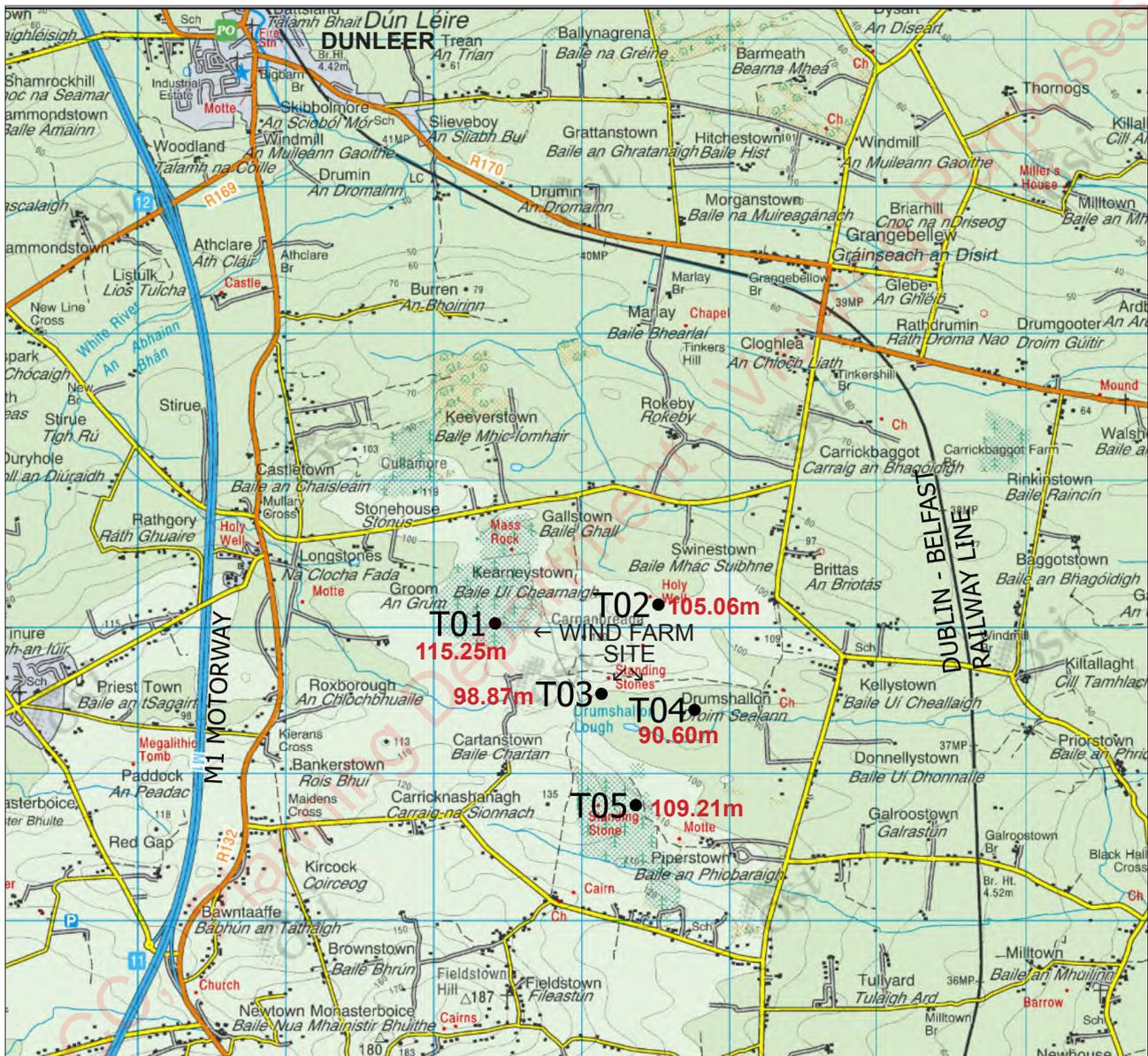
2.1 The five proposed turbines are sited between the M1 motorway and the Dublin-Belfast railway line, at around 1.92km to 3.31km to the east of the M1 motorway, and at similar distances west of the railway line. Their locations are indicated as magenta-coloured dots superimposed on the aerial photograph below. —



2.2 The land on which the turbines are proposed is moderately hilly, with hilltops in the vicinity rising to 113m, 119m, 130m and 135m OD, and with several forest areas on the flanks of these hills.

A contour map (of the same area as in the aerial photo above), with turbine locations and their elevations above sea level indicated, appears on the following page 3 >.

- 2.3 Five turbines in all are being proposed (spread over an area of 1.5km by 1.5km approx.), all of 180m overall height to blade tip, with the five turbine bases at 90.60m, 98.87m, 105.06m, 109.21m, and 115.25m OD. Consequently the tops of the turbines' blades (of 180m height) will extend from 270.6m OD to 295.25m OD.
- 2.4 The locations of the turbines (as added black dots) are shown on the contour map below, along with the elevations above mean sea level of their bases.



- 2.5 The wind farm site is centred in the area between the towns Dunleer, Termonfeckin, and Tullyallen, and is at 9-10km due west of Clogherhead. Of these towns, the nearest is Dunleer, at 4-5km to the north-west.

[Town locations also appear on the copies of Louth County Development Plan Maps 3.2 and 8.15 on pages 6 & 7 following >>.]

### **3. List of Aviation-related Considerations**

#### **3.1 Louth County Council Parameters regarding Wind Turbines:**

These include:

- (i) Written text in Section 10.6 of Louth County Development Plan 2021-'27 concerning "Wind Energy".
- (ii) Location of the site in relation to Louth Co. Co.'s Map 10.1 (*on page 10-26 of the Louth CDP*) showing "Areas Suitable for Wind Development".

#### **3.2 Civil Aviation and Irish Aviation Authority (or AirNav) Considerations:**

These include:

- (i) Assessment of the site's proximity to any Civil Airport/Aerodrome, or to any Aviation Navigational Equipment or Radar Installations.
- (ii) Turbine locations in relation to any aviation "Obstacle Limitation Surfaces".
- (iii) Assessment of the site in relation to any Civil Aviation Flight Paths.
- (iv) Specific IAA, ICAO, & EASA Requirements re Wind Turbines.

#### **3.3 Department of Defence & Air Corps Considerations:**

These include:

- (i) Assessment of proximity to any Air Corps facility or to any Army Camp.
- (ii) Assessment of the site in relation to any Air Corps charted flight paths, or to any Military Operating Area.
- (iii) Assessment of the site in relation to suggested low-level Air Corps helicopter routes above motorways and national roadways.
- (iv) Other Department of Defence lighting considerations in relation to wind turbines.

*These Considerations in relation to the site near Kellystown are discussed on the following pages.*

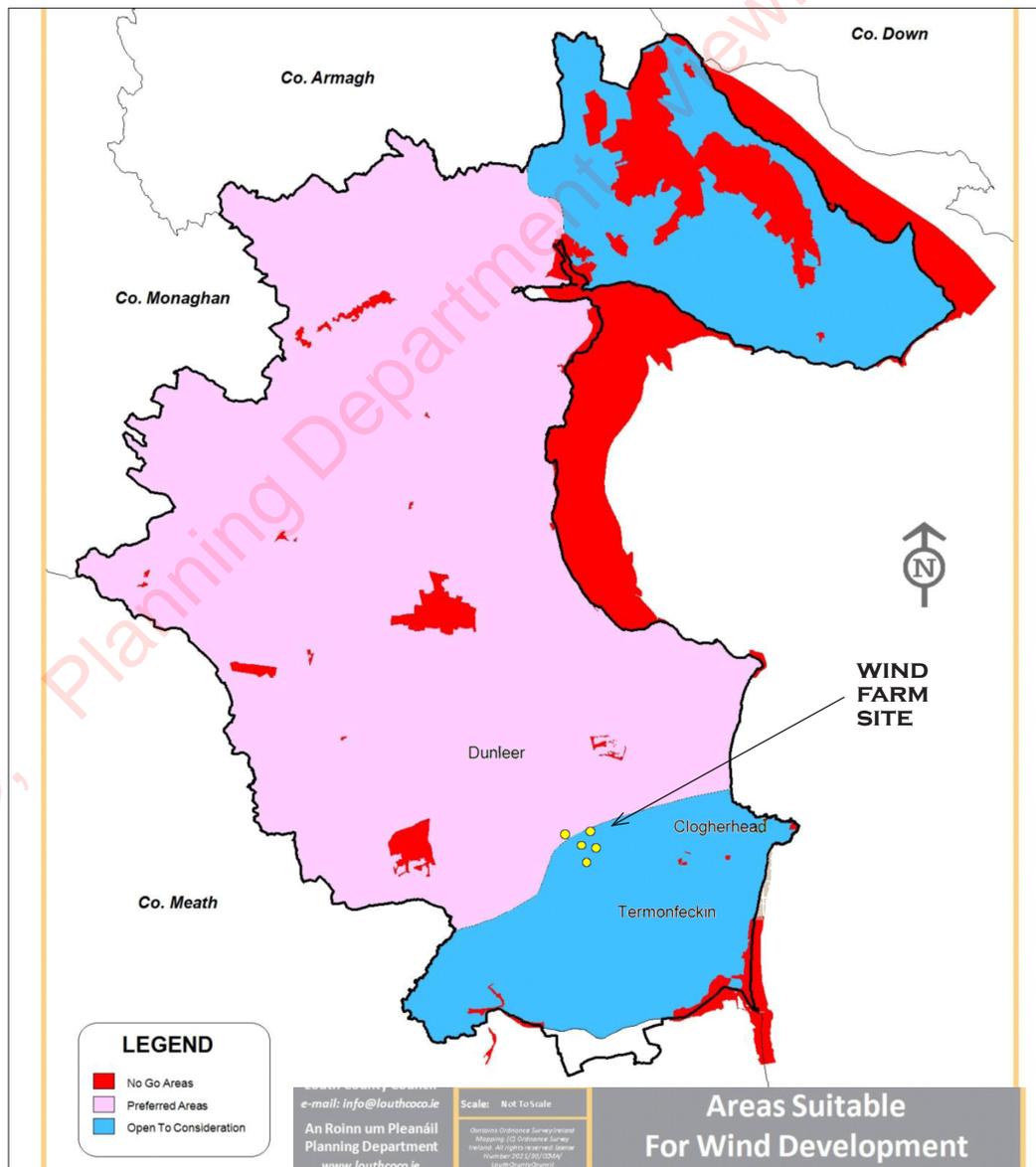
**4. Louth County Development Plan 2021-27**

4.1 Section 10.6 of the Louth County Development Plan 2021-'27 (within Chapter 10 – “Infrastructure and Public Utilities”) deals with “Wind Energy”, and states:

*“The Council recognises the significant contribution that wind energy can make as a clean sustainable solution to energy requirements and its vital role in helping achieve national targets in relation to fossil fuel reductions and consequently greenhouse gas emissions. In the next decade, onshore wind will continue to be Ireland’s main source of renewable energy.”*

and *“The Council will continue to support and encourage the principle of wind energy development in accordance with Government policy and having regard to the Wind Energy Development Guidelines for Planning Authorities or any update made thereto during the lifetime of the Plan.”*

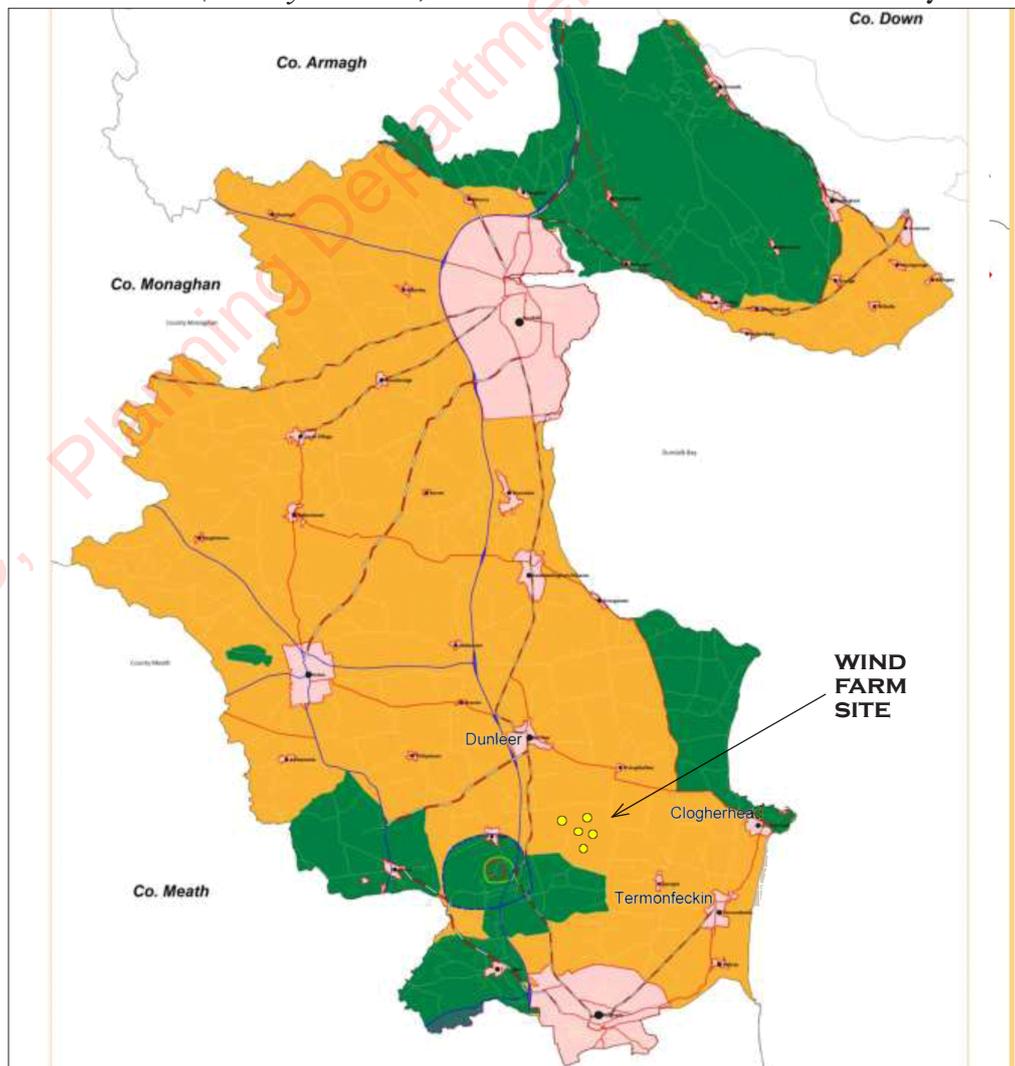
4.2 **Map 10.1** on page 10-26 shows “**Areas Suitable for Wind Development**”. Below is a copy of this map, onto which we have added (in yellow) the 5 turbine sites —



4.3 It can be seen (from Louth Map 10.1 on the previous page) that the proposed wind farm (*in yellow*) near Kellystown lies where the two areas “suitable for wind development” meet, with one of the turbines in the (*pink*) “Preferred Areas” and the other four turbines in the (*blue*) area “Open to Consideration”. **Objectives in regard to Wind Development** include the following (on page 10-27 of the Plan):

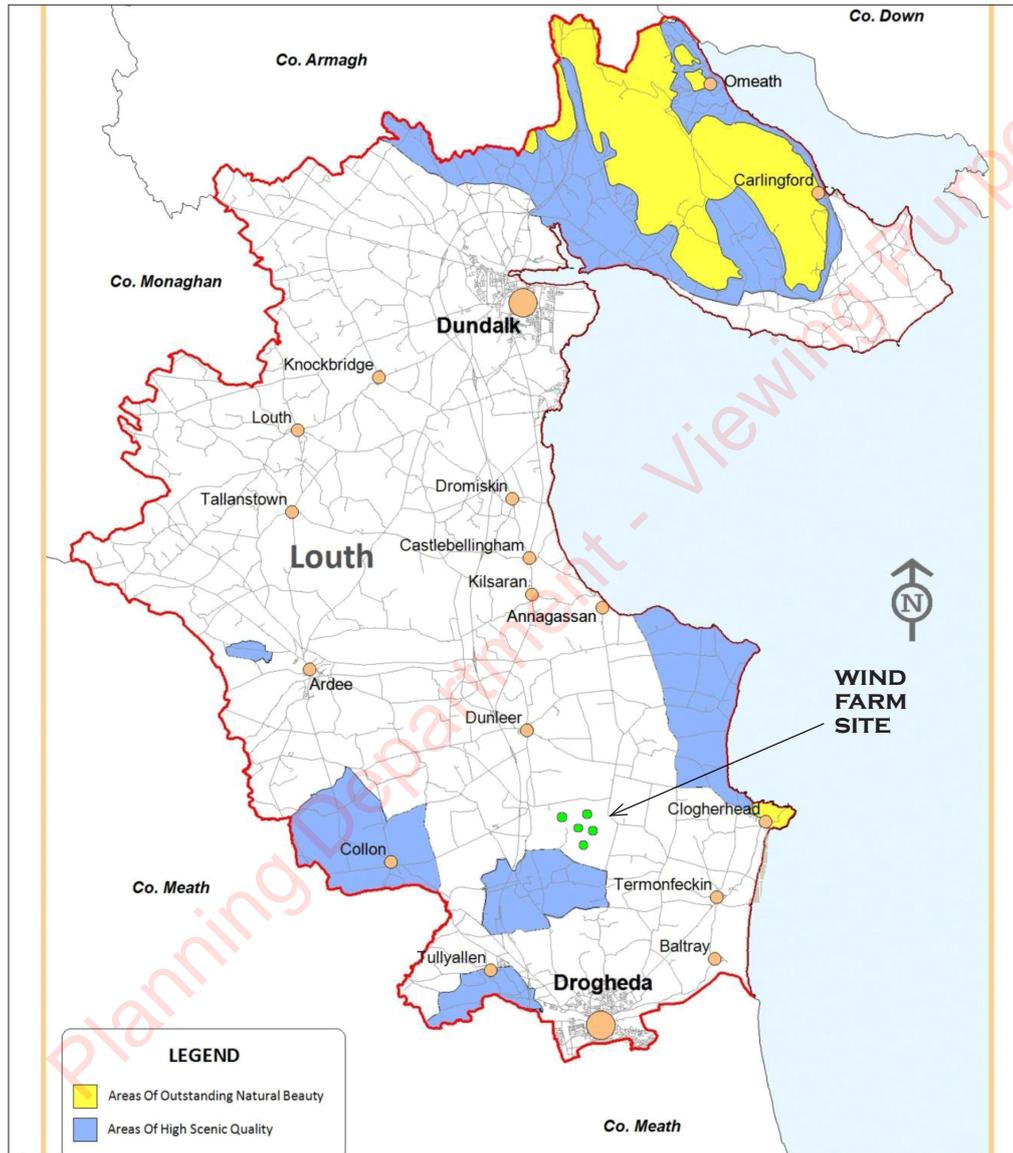
Policy Objective	
<b>IU 56</b>	To encourage the development of wind energy, in accordance with Government policy and guidance and the 'Wind Energy Development Guidelines' (2006) or any revisions thereof which may be issued during the lifetime of the Plan.
Policy Objective	
<b>IU 57</b>	To facilitate the development of wind energy in an environmentally sustainable manner ensuring proposals are consistent with the landscape preservation objectives of the Plan, the protection of the natural and built environment and the visual and residential amenities of the area.
Policy Objective	
<b>IU 58</b>	To promote the location of wind farms and wind energy infrastructure in the 'preferred areas' as outlined on Map 10.1, to prohibit such infrastructure in areas identified as 'no-go areas' and to consider, subject to appropriate assessment, the location of wind generating infrastructure in areas 'open for consideration'.

4.4 Below is a copy of **Map 3.2** (on page 3-25 of the Plan) on which the Kellystown wind farm site (*added yellow dots*) can be seen to lie within “**Rural Policy Zone 2**”:



4.5 The copy of Map 3.2 (on the previous page) shows that the wind farm site lies *outside* the Rural Policy Zone 1 areas which are defined in the Plan (on pages 3-23) as having “significant landscape value”.

And below is a copy of **Map 8.15** (on page 8-40 of the Plan) on which it can be seen that the proposed turbine sites (*in added green dots*) lie well outside all areas defined as being of “Outstanding Natural Beauty” or of “High Scenic Quality” —



4.6 From the maps shown at paras. 4.2, 4.4, & 4.5 above, it can be see that the proposed wind farm lies in “suitable” and “open to consideration” locations which are “consistent with the landscape preservation objectives of the Plan, the protection of the natural and built environment and the visual and residential amenities.”

Aviation aspects are not mentioned in the Louth Plan 2021-27, other than comments in relation to accessibility to Dublin Airport and the county’s location half-way between Dublin and Belfast Airports. This half-way location (i.e. not beside any major airport) is advantageous for a wind farm location, and the various other aviation considerations are dealt with in Sections 5 and 6 following >>.



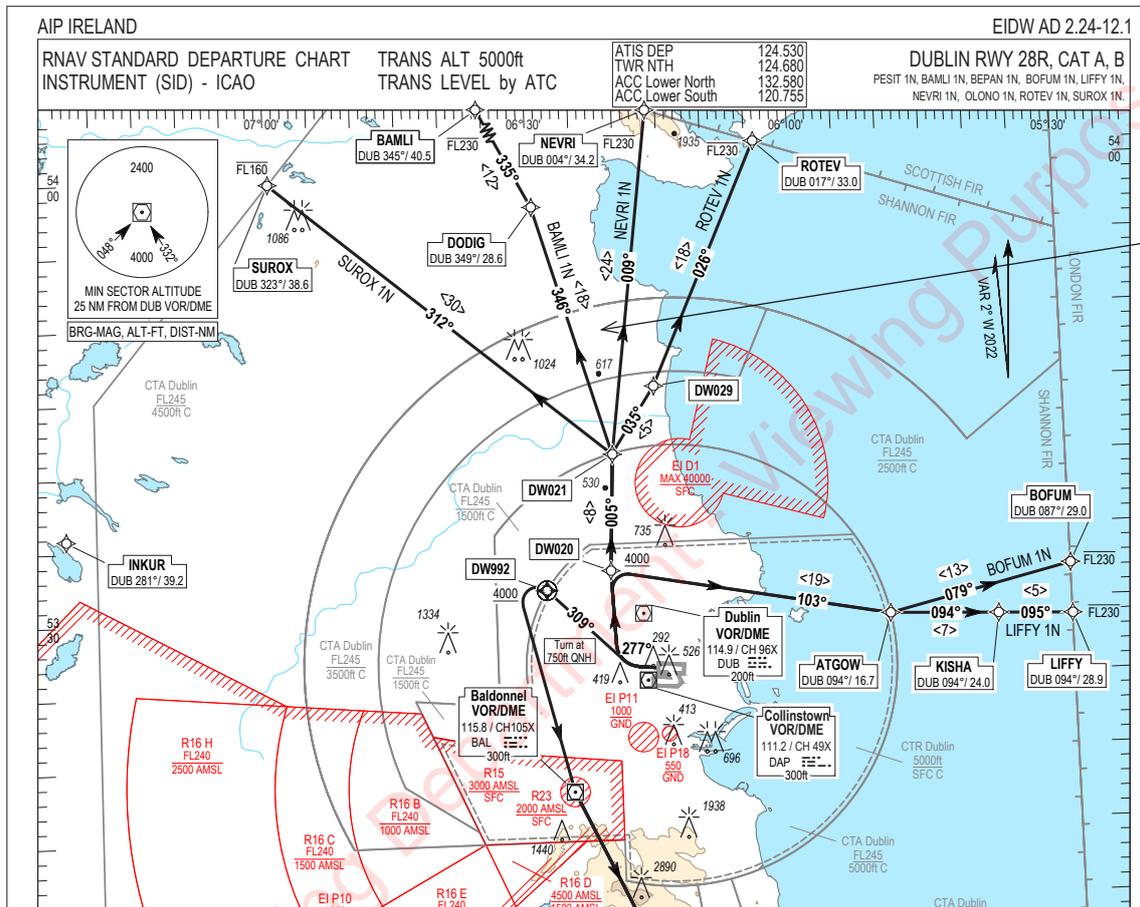
## 5.2 Concerning the items listed at paragraph 5.1 above —

- (a) In regard to the aerodromes and airport listed at (i), (ii), (iii) – **the Kellystown site is well outside any “obstacle limitation surfaces” for these aerodromes**, which (per EASA and ICAO definitions) extend to 15km from Dublin Airport and to 2.7km from the smaller aerodromes.
- (b) In regard to item (iv) – the former military aerodrome at Gormanston, this airfield is currently disused, and even if Gormanston were to come into use again, the Kellystown site would also be outside any “obstacle limitation surfaces” for that aerodrome. And in regard to the offshore military firing range (identified on the chart as a red fan-shape, and named “Danger Area EID1” by the IAA, the wind farm site is well clear of this area and could not affect it, or be affected by it.
- (c) In regard to (v) – the existing Collon Wind Farm at 12km west of the Kellystown site, it should be noted that, although the Collon turbines (listed as being 278ft /85m tall) are half the height of the proposed Kellystown turbines, they are located on significantly higher ground, so that their tops extend to 1024ft /312m above sea level, which is **more elevated than the 295.25m height above sea level to which the highest of the proposed Kellystown turbines would extend**. This means that any aircraft flying at sufficient clearance above the Collon turbines will also have sufficient height above the Kellystown turbines.
- (d) In regard to item (vi) – aerial sporting activities, the Kellystown site is well clear of the hang-gliding location at Dunsany Point, and it is also well clear of the ballooning activity which is indicated on the chart at Slane, Navan, Athboy and Trim airfields in Meath, and would not affect these aerial sporting activities.
- (e) In regard to (vii) – the Dublin ATC Control Area which lies above the site, it should be noted that this control area is at a particularly high level in this location, commencing at “Flight Level 245” (i.e. at approximately 2,450ft /747m amsl) and rising to 3,500ft /1067m amsl, the lower dimension of which is **450m+ higher than the tops of the proposed turbines** at Kellystown.
- (f) In addition to identifying the above aviation features, the Aeronautical Chart also shows that there are no radar installations or other aviation navigational equipment in the vicinity of the proposed turbines (which might be affected by them) – the nearest being a beacon at Gormanston, and a radar installation at Ashbourne.

## 5.3 In summary, none of the above aviation features will be affected by (or will affect) the proposed wind farm near Kellystown.

### 5.4 Civil Aviation Flight Paths

The one current aviation chart which shows a flight route near the Kellystown area is Dublin Airport Departure Chart EIDW-AD-2.24-12.1 which shows two high-level transit routes (“BAMLI” & “NEVRI”) several thousand feet above the site, which would be unaffected by the proposed development. —



### 5.5 Aviation Authority Guidance with regard to Wind Turbines

While wind turbines in the immediate vicinity of aerodromes or radar installations may be subject to restrictions – including various height restrictions for up to 15km from major airports and assessment for potential interference with radar – such restrictions do not apply at the Kellystown site, and there is usually no automatic objection to wind turbines or wind farms from the various aviation authorities.

The principal requirements are that any wind turbines greater than 45m in height above ground should —

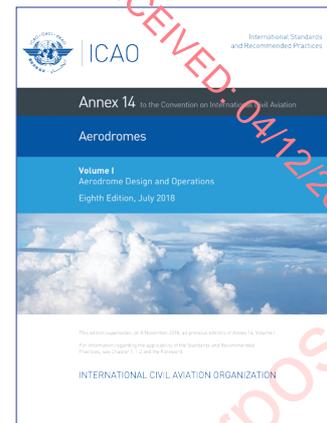
- (i) be marked and lit (in specific ways related to their height), and
- (ii) be identified on aviation charts (as in the example on page 8 above).

Any observations by the aviation authorities in relation to the proposed turbines near Kellystown would be likely to refer to these two requirements.

## 5.6 ICAO Guidance:

ICAO [the International Civil Aviation Organization] has included a section (#6.2.3) on “Wind Turbines”, under “Marking and Lighting” in its revised Annex 14 Standards and Recommended Practices (Volume I – Aerodromes) of 2018 >>. This includes, among others, the following lighting recommendation:

- ii) *for wind turbines from 150 m to 315 m in overall height, in addition to the medium-intensity light installed on the nacelle, a second light serving as an alternate should be provided in case of failure of the operating light. The lights should be installed to assure that the output of either light is not blocked by the other; and*
- iii) *in addition, for wind turbines from 150 m to 315 m in overall height, an intermediate level at half the nacelle height of at least three low-intensity Type E lights, as specified in 6.2.1.3, should be provided. If an aeronautical study shows that low-intensity Type E lights are not suitable, low-intensity Type A or B lights may be used.*



## 5.7 EASA Guidance:

EASA [the European Aviation Safety Agency], in its Aerodrome Specifications of 2017, also has a section “CS ADR-DSN.Q.851 – **Marking and lighting of wind turbines**”, with the following applicability: “*When considered as an obstacle a wind turbine should be marked and/or lighted.*” and it includes lighting specifications in the exact same wording as the ICAO Annex 14 document quoted above.

## 5.8 IAA (and AirNav-Ireland) Guidance:

IAA [the Irish Aviation Authority] has published in 2015 Guidance Material on Off-shore Wind Farms. While mainly dealing with off-shore turbines, it also contains useful information with regard to inland wind turbines, in particular in relation to “*lighting, marking and radar enhancement requirements and also on information required for promulgation to ensure the conspicuity of wind farm machines and associated structures, so as to protect air and marine navigation safety.*” It also provides guidance that turbines  $\geq 90\text{m}$  in overall height be lit and marked, and notified to the IAA three months in advance of construction.



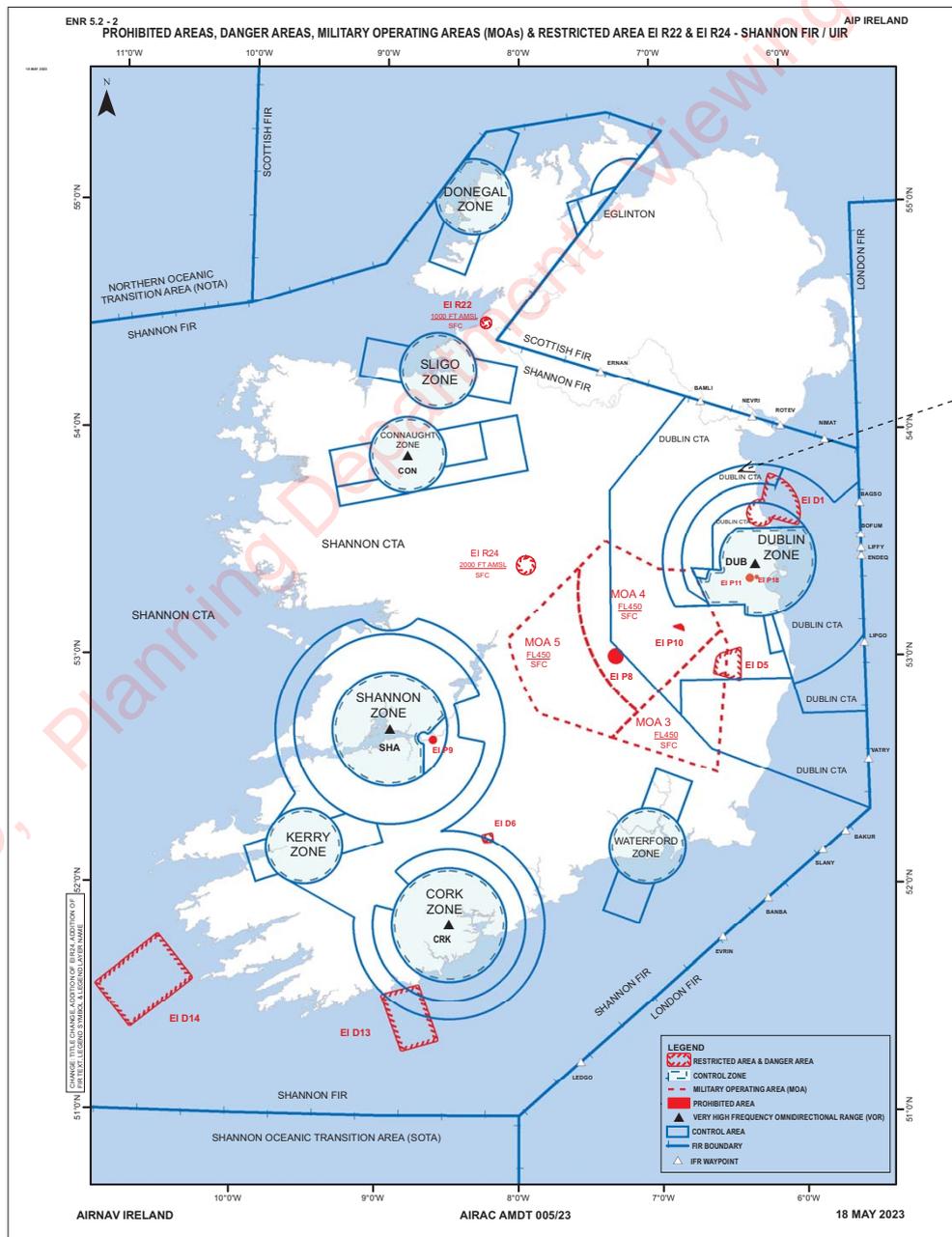
This advance notification as to any potential “obstacle” to aviation – **including any temporary object such as cranes during construction** – is also required under the IAA Obstacles to Aircraft in Flight Order [S.I. 215 of 2005], which requires 30 days’ minimum notice (although the three months’ notice referred to above is preferred). As of May 2023, the IAA’s Air Navigation Service Provider responsibilities have been transferred to a new commercial semi-state company: *Seirbhís Aerloingseoireachta na hÉireann* (or in English, the Irish Air Navigation Service), also known as: “**AirNav Ireland**”, and the issuing of notifications to pilots in regard to aviation “obstacles” now falls under its remit.



## 6. Department of Defence Considerations

6.1 In a submission to Kildare County Council the Department of Defence has expressed concern in regard to wind turbines in excess of 45m in height in the vicinity (i.e. within 5 Nautical Miles or 9.6km) of “military installations” – i.e. army camps – or within 20NM (or 37km) of Casement Aerodrome, or – in general – anywhere within the various designated “Military Operating Areas”.

These “MOAs”, set up under Section 68 of the Irish Aviation Authority Act 1993 (and outlined **in red dashed lines** in the current chart below) are mainly located over Kildare, and parts of Wicklow and Offaly etc., and are defined as areas under military air traffic control from which civil aircraft flying can be excluded. The chart below also shows (in red) the “Danger Area” surrounding Gormanston, and **it can be seen that the Kellystown wind farm site lies outside all these military areas.**





#### 6.4 Military Helicopter Routes above Motorways:

One item to note is that the Department of Defence has stated that its military helicopters may navigate by following motorway routes, and has identified in some documents several motorways and roads within 3 Nautical Miles of which it wished that no tall objects would be erected.

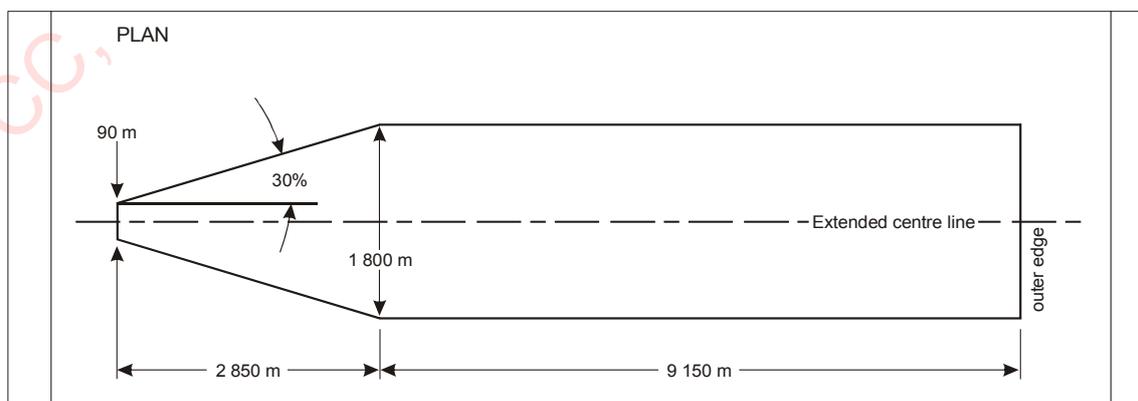
These Department of Defence observations have included —

- (i) a notification to Kildare County Council in regard to the M4, M7/N7, & M9 roadways within the military Operating Areas (MOA3 & MOA4) to the west of Casement Aerodrome;
- (ii) a letter of 23 August 2023 to Jennings O'Donovan & Ptnrs, Consulting Engineers, which stated that the M1/N1 was identified as a critical Air Corps route to access regional areas (although the letter also states that “nothing in the above observations shall be taken as a binding response”); and
- (iii) an earlier “draft Air Corps position paper” dated 8 August 2014 which identified a large number of routes throughout Ireland – i.e. all motorways and thirteen N roads, including the M1, N1, & N2 within Co. Louth – within 3NM of which the Air Corps desired that there would be no tall structures or turbines of greater than 45m in height above ground: a map (attached at “Appendix D” to this draft position paper) indicated the locations of 25 routes, and an extract from this map appears on the following page

#### 6.5 Assessment of the Suggested 11.1km-wide Military Helicopter Routes:

Bearing in mind that 3 Nautical Miles (i.e. 5.556km) to either side of a roadway equals an overall width of 11.1km, and taking into account that the M1 motorway lies at 1.92m to 3.31km to the west of the proposed Kellystown wind farm site, this potential Department of Defence restriction is assessed as follows —

- (i) The International Civil Aviation Organization, in its *Annex 14, Volume 2 – Heliports* (which contains the image below) states that the “obstacle limitation surfaces” for helicopter Approaches and Take-offs will have an overall width of 1.8km at their widest part. This applies for all helicopters (and not just for the more sophisticated twin-engined craft such as are used by the Irish Air Corps).



## 6.5 [continued]

- (ii) As noted in paras. 5.6 & 5.7 above, ICAO and EASA both make provision for wind turbines of up to 315m in height in any location, with stated requirements for the lighting of turbines and for identifying them on aviation charts, but with no additional requirement to facilitate the accessing “of regional areas” by civil helicopters flying at low levels beyond the immediate surroundings of aerodromes & heliports.
- (iii) Former Air Corps helicopter pilots inform us: (a) that there is no legal requirement for provision of a corridor of 11.1km (/6NM) width – equivalent to the distance from O’Connell Bridge to Howth – for helicopter navigation above roadways; (b) that such a width would be an excessive requirement for the purpose of low-level navigation of a helicopter above a motorway; and (c) that a width of 1.8km/1NM overall (i.e. 0.9km to either side) would be sufficient for aviation safety purposes.
- (iv) Provision in aviation legislation for the low-level flying of military aircraft is made only in relation to the Military Operating Areas, and the specific Restricted & Danger Areas delineated by the IAA and published by AirNav Ireland, and (as shown in para. 6.1 above) the proposed Kellystown Wind Farm is well outside all such areas.

 <b>EASA</b>	<b>Easy Access Rules for Standardised European Rules of the Air (SERA)</b>	ANNEX: Rules of the Air
		SECTION 5 Visual meteorological conditions, visual flight rules, special VFR and instrument flight rules
<p>(f) Except when necessary for take-off or landing, or except by permission from the competent authority, <u>a VFR flight shall not be flown:</u></p> <p>(1) over the congested areas of cities, towns or settlements or over an open-air assembly of persons at a height less than 300 m (1 000 ft) above the highest obstacle within a radius of 600 m from the aircraft;</p> <p>(2) elsewhere than as specified in (1), at a height less than 150 m (500 ft) above the ground or water, or 150 m (500 ft) <u>above the highest obstacle within a radius of 150 m (500 ft) from the aircraft.</u></p>		

Outside these Military Operating Areas [^], all aircraft and helicopters are obliged to observe the European Union Aviation Safety Agency’s *Standardised European Rules of the Air* [SERA] of 2020 (also contained in the Irish Aviation Authority Rules of the Air Orders S.I. 72 of 2004 & S.I. 266 of 2019), which (as noted in the extract above) require aircraft to fly at specified safe heights (e.g. 150m & 300m) above whatever obstacles exist within horizontal distances of 150m & 600m (i.e. substantially less than the 11,100m [3+3NM] mentioned in the Air Corps’s “position paper” of 2014).

- (v) In the map attached (at “Annex D”) to the Air Corps’s “position paper” of 2014 showing suggested “Low Level Routes” [^], these routes (which would overlap with one another at 6NM overall width) are all drawn at less than 1.75NM width – i.e. at 1.6km to either side of all routes – and the Kellystown wind farm is outside that distance from any route on that map (including the M1 route).



## 6.5 [continued]

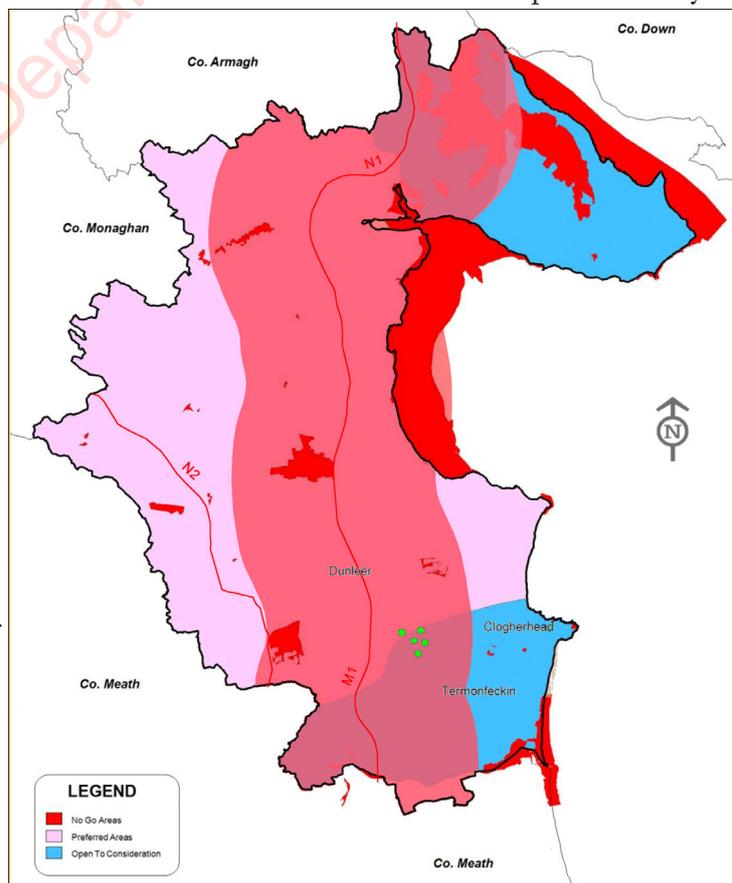
(vi) Apart from the 11.1km width being excessive and arbitrary (and bearing no relationship to ICAO & EASA requirements) it is necessary to recognise that it is not possible to maintain an obstacle-free corridor along *any* of the motorways or N-roads listed in the Air Corps “position paper” for the simple reason that each one of the listed roads is already bordered at closer distances by existing obstacles of greater than 45m height. These include the following in Co. Louth (all marked on the aviation chart shown on page 8 above) —

M1 & N1: 328'/100m -high Dublin Airport control tower at 3km,  
 288'/88m -high turbine near Rush, at 2km,  
 407'/124m -high mast, Duleek, at 2km,  
 381'/116m -high mast, Jonesboro, at 2km.

N2: 328'/100m -high airport control tower at 3.8km,  
 233'/71 -high turbine near Skreen, at 1km,  
 278'/85m -high turbines, Collon, at 1km,  
 202'/62m -high mast near Ardee, at 2km.

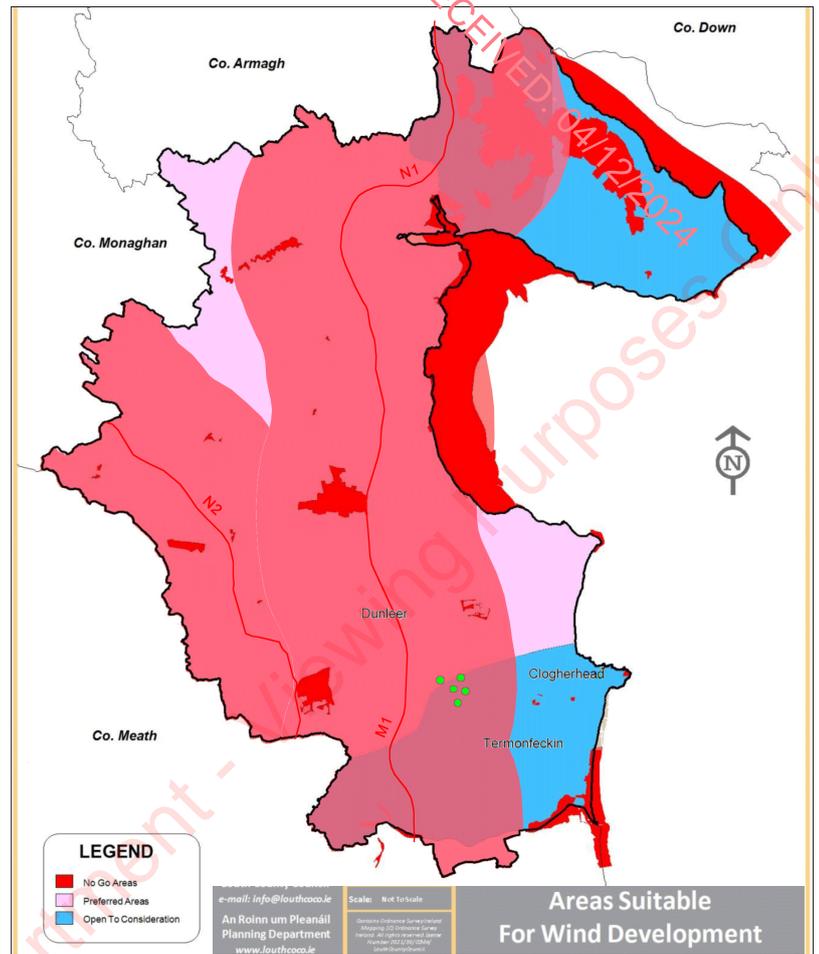
Along other listed motorways (M4, M7, M8, M9, & M50), there are at least twelve tall obstacles (of up to 140m in height) identified on aviation charts as being within 1km-5km of the motorway centrelines. In these circumstances it is not possible (or safe) for a 11.1km low-level obstacle-free corridor to be adopted (or assumed) along the routes listed in the Air Corps “position paper”. In addition the use of “low level routes” (towards Co. Louth) by Air Corps helicopters along the M1, M2, N2 & M50 (as shown in the extract on the previous page) would require the closure of Dublin Airport during operation of these routes, as they would conflict with Approaches & Take-offs to & from all of Dublin Airport’s runways.

(vii) The drawing opposite [>] shows (in darker pink) the effect of the suggested 11.1km-wide low-level corridor for Air Corps helicopters along the M1 & N1 upon Co. Louth’s adopted Wind Development Strategy. It can be seen that this 11.1km strip would remove more than half of all “Preferred Areas” and “Areas Open To Consideration” for Wind Turbines throughout all of County Louth, and is in conflict with the current Louth Development Plan 2021-’27.



(viii) The additional effect upon Co. Louth's adopted Wind Development Strategy of the suggested 11.1km-wide low-level corridor for Air Corps helicopters along the N2 (as well as the M1 & N1) is shown opposite (*in further dark pink >*). It can be seen that this 11.1km strip would remove almost all of the "Preferred Areas" as well as half the "Areas Open To Consideration" for Wind Turbines, and would be in major conflict with the current Louth Development Plan 2021-'27.

(ix) ***In Summary*** – given that ICAO & EASA have both specified an overall width of 1.8km – at their widest – for the "obstacle limitation surfaces" for helicopter Approaches and Take-offs, it is our view that a 0.9km clear area to either side of any visual flying route (e.g. above a motorway or N-road) should provide a safe and more than adequate "low level route" for military helicopters. As the Kellystown Wind Farm site is at 1.92km at its nearest from the M1 motorway, it would be well clear of any such low-level helicopter route above the M1, N1 or N2, should a need for such routes arise.



## 6.6 Department of Defence Requirements for Lighting of Wind Turbines:

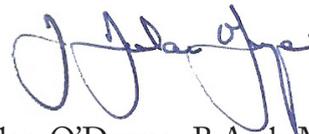
The Department of Defence also has a requirement that any wind turbines should be illuminated as follows (to suit Air Corps night vision goggles):

- All turbines or tall structures, should be illuminated by high intensity obstacle lights or aeronautical marking that will allow the hazard be identified and avoided by aircraft in flight. and*
- Obstruction lights used should be incandescent or of a type visible to Night Vision Equipment. Obstruction lighting fitted to obstacles must emit light at the near Infra-Red (IR) range of the electromagnetic spectrum specifically at or near 850nanometres (nm) of wavelength. Light intensity to be of similar value to that emitted in the visible spectrum of light.*

We recommend that – in addition to the ICAO & EASA & IAA lighting requirements mentioned on page 11 – the infrared lighting (*above*) requested by the Dept. of Defence would also be installed on the proposed five turbines at Kellystown.

## 7. SUMMARY

- 7.1 The proposed wind farm near Kellystown appears to meet all of the requirements set out for Wind Development within the Consolidated Louth County Development Plan 2021-2027. In particular the site is well clear of all “no-go” areas, and of any built-up areas, and well clear of all areas identified in the Plan as being of “significant landscape value” or of “high scenic quality.”
- 7.2 The site of the proposed wind farm is well clear of all aerodromes, and of all aviation facilities (including navigational equipment and radar, and aerial sporting areas), and outside all aviation “obstacle limitation surfaces”. The site lies under an outer segment of the Dublin ATC Control Area, but this control area (from ~2,450ft to 3,000ft amsl), and any associated civil aircraft flight routes, are at sufficient height to be unaffected by the proposed wind turbines.
- 7.3 The proposed wind farm site is well clear of all military installations and restricted areas, and well clear of any 1.8km-wide low-level helicopter route (per ICAO & EASA dimensions) which might be adopted for military helicopters above the M1.
- 7.4 The elevation (above sea level) of the highest point of the proposed 180m-tall turbines would be at 295.25m OD, and this is a lower elevation-OD than a nearby wind farm on higher ground at Collon, which is at 1024ft /312m OD (per aviation charts).
- 7.5 The principal aviation requirements in relation to the proposed turbines are:
- that they be marked and lit in accordance with IAA requirements and ICAO and EASA lighting specifications for objects of 150m-315m in height;
  - that the infra-red lighting requirements of the Department of Defence (to suit military night-vision goggles) also be provided;
  - that advance notifications (per SI 215 of 2005, etc.) of installation of turbines, and of all intended cranes, be given to the IAA (and to AirNav Ireland).
- 7.6 Overall, from an aviation point of view, the site near Kellystown appears to be suitable for a wind farm, and not in conflict with any current aviation requirement.



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28<sup>th</sup> June 2024  
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