

John

ren Hickey

From: Bord
Sent: Monday 3 July 2023 17:05
To: Appeals2
Subject: FW: Objection Letter re. ABP 317239-23
Attachments: 2023-07-03 Objection Letter to ABP re ABP 317239-23.pdf

From: Defence Property Management Planning <PropertyManagementPlanning@defence.ie>
Sent: Monday, July 3, 2023 4:58 PM
To: Bord <bord@pleanala.ie>
Cc: Jason Kearney (Defence) <Jason.Kearney@defence.ie>; Gillian Holden (Defence) <Gillian.Holden@defence.ie>
Subject: Objection Letter re. ABP 317239-23

A Chara,

Please find attached, objection letter in respect of An Bord Pleanála ref. ABP 317239-23

Development by Cloncant Renewable Energy Limited for a windfarm development located Ticknevin, Carbury, Co. Kildare

Is mise, le meas,
Don

Don Watchorn

Property Management Branch

An Roinn Cosanta

Department of Defence

Bóthar an Stáisiúin, An Droichead Nua, Contae Chill Dara, W12 AD93.

Station Road, Newbridge, Co.Kildare, W12 AD93.

Fógra faoi Rúndacht: Tá an ríomhphost seo agus aon iatán a ghabhann leis rúnda. Is leis an duine / nó daoine sin amháin a bhfuil siad seolta chucu a bhaineann siad agus ní ceart iad a léamh ná a scaoileadh chuig aon tríú páirtí gan cead roimh ré ón Roinn Cosanta.

Notice re Confidentiality: This e-mail and any attachment transmitted with it are confidential. They are intended solely for the use of the intended recipient and should not be read or released to any third party without the prior consent of the Department of Defence.



An Bord Pleanála
64 Marlborough Street,
Dublin 1
D01V902

03 July 2023

ABP ref. 317239-23

Dear Sir/Madam,

I write with regard to the above development by Cloncant Renewable Energy Limited for a windfarm development located Ticknevin, Carbury, Co. Kildare, noting the Board's decision has been quashed.

The Minister for Defence is responsible for the regulation of military aviation, whereas the Irish Aviation Authority (IAA) is responsible for the safety regulation of civil aviation including aerodromes. The IAA does not have remit for military aviation or installations. Safeguarding of military flight operations and installations is intended to protect both current and future aircraft operations and also to take account of the security requirements associated with some of those operations.

Following consultations with our Air Corps colleagues at Casement Aerodrome, the Department of Defence would like to make the following objection:

- The Department of Defence opposes the erection of wind farms or other obstacles which will affect the ability of the Irish Air Corps to train and operate in a safe and economic manner. The Irish Air Corps specifically advise that the intensity of the development will, if proceeded with, entail low level training in the area will have to cease.
- The development, including the intensification sought, lies within an area in which low flying operations take place by Irish Air Corps aviation assets.
- The routes taken by Irish Air Corps aircraft to multiple training areas within the MOA 4 and MOA 5 pass through the area of the windfarm development. The windfarm development shall significantly reduce aircraft navigability in the EI-R16 and MOA 4 areas.
- A portion of the development lies on lands underlying Military airspace EI-R16 and MOA 4 within the 20 nautical miles (NM) area of Casement Aerodrome that



is protected against tall structures. At its nearest, the windfarm boundary is 19.8 NM from Casement Aerodrome Reference Point (ARP)

- The development is located in an area in which the Irish Air Corps aviation assets uses the EI-R16 and Military Operating Areas (MOA's) to conduct pilot training and to recover aircraft conducting approaches under instrument flight rules to Casement Aerodrome. Instrument approach procedures to Casement Aerodrome are primarily conducted from the west through the EI-R16. This area is designated in accordance with Section 68 of the IAA Act for use by the Defence Forces and published in ENR 5-2 of AIP IRELAND. Military aircraft in this airspace may not be flying in compliance with the rules of the air.
- A tall structure does not have to penetrate restricted air space to impact Air Corps flight operations. The ability of transiting aircraft to fly underneath the lower level of restricted airspace so remaining clear of restricted airspace is a standard method employed by Military Air Traffic Services to provide separation from Instrument Flight Rules (IFR) traffic operating above.
- The development, will effect transiting aircraft to remain clear and below restricted airspace.

Any Irish Air Corps (IAC) requirements are separate to Irish Aviation Authority (IAA) requirements.

Please contact me if you have any queries in this regard.

Yours faithfully,

Jason Kearney
Principal Officer
Property Management Branch
Department of Defence
Station Road
Newbridge
Co. Kildare W12 AD93
045 452143