



Strategic Housing Section  
An Bord Pleanála  
64 Marlborough Street,  
Dublin 1  
D01V902

14 February 2022

**Re: PLANNING REGISTRATION NO: ABP 312501-22**

Dear Sir/Madam,

I write with regard to the above planning application by Tetrarch Residential Limited for Strategic Housing Development (SHD) located at Mill Road, Saggart, Co. Dublin.

Following consultations with our Air Corps colleagues at Casement Aerodrome, The Department of Defence wishes to object to the development of Block A as outlined below:

**1. Introduction.**

- a. The Minister for Defence is responsible for the regulation of military aviation, whereas the Irish Aviation Authority is responsible for the safety regulation of civil aviation including aerodromes but does not have remit for military aerodromes. Safeguarding at Casement Aerodrome is intended to serve for protection of current and future aircraft operations and also to take account of the security requirements associated with some of those operations. ICAO Standards and Recommended Practices with respect to safeguarding are applied as part of Department of Defence safeguarding.
- b. Casement Aerodrome at Baldonnel is the sole permanent air base for the Irish Air Corps (IAC) which operates a mixed fleet of fixed wing aircraft and rotary aircraft engaged in a range of training and operations. Typical helicopter tasks include security missions in support of personnel on the ground, aeromedical missions in support of the HSE, operation of the Garda Air Support Unit (GASU), firefighting, flood and weather relief. Fixed wing missions include air ambulance, Search and Rescue (SAR), surveillance and maritime patrols (offshore and inshore) and Ministerial Air Transport Service (MATS). Such missions are provided 24hrs a day and 365 days a year. The majority of aircraft movements at Casement occur in the context of pilot and aircrew training – both for aeroplanes and helicopters.



- c. Casement Aerodrome is the only secure airport in the state providing the government and the president with an independent and flexible transport service. Routinely security sensitive arrivals and departures to the State occur at Casement Aerodrome. Ensuring the security of Casement is essential to this role.
- d. Casement Aerodrome is base for c.1000 military and civilian personnel, most of whom are highly skilled and provides opportunities for local contractors. The Air Corps College has close links to SOLAS and Technical University Dublin through the Trainee Technician Scheme recognition of qualifications. There are links to local primary and post primary schools where reciprocal visits occur especially with regard to the Transition Year Programme.

## **2. The Purpose of Irish Air Corps Safeguarding.**

- a. The purpose of safeguarding is to protect the long-term viability of an aerodrome and must protect current operations, configurations and usages applied in the future. In this regard safeguarding needs to consider the longest possible view, in terms of developments of the physical infrastructure and changes in aircraft operations and navigation that may provide opportunities to exploit current or future infrastructure.
- b. In particular safeguarding is intended, inter alia, to:
  - (1) Protect the current and future operation of Casement Aerodrome through the application of ICAO obstacle limitation surfaces;
  - (2) Reduce the bird hazard posed to aircraft that may be attracted to fauna, man-made features or human activities;
  - (3) Ensure that temporary obstacles, associated with approved developments, are dealt with in a safe manner.
  - (4) Protect the ability of the IAC to access regional areas from its base at Casement Aerodrome.

## **3. Potential impact of Mill Road SHD on Irish Air Corps flight operations.**

- a. ICAO Annex 14 Obstacle Limitation Surfaces (OLS) are established at Casement Aerodrome. 'Apartment Block A' in the proposed development penetrates the Inner Horizontal Surface (IHS), which is intended to protect aircraft which are visually maneuvering in the vicinity of an aerodrome. The IHS surface begins at 131.8m above mean sea level (AMSL). Based on the details supplied in the applicants website (which the Department assumes forms the basis of the application) it is the



IAC's calculation that the development of Block A, in particular, stands at 135.8m which is a clear breach of the IHS (by some 4m). This would require an Aeronautical Study (please see (d)).

- b. The area of the proposed development is regularly overflowed by the following types of visually maneuvering aircraft:
  - 1. Fixed wing aircraft operating in the standard and low-level Casement Aerodrome circuit patterns. The standard circuit pattern altitude is 1,300ft AMSL and the low-level pattern altitude is 800ft AMSL.
  - 2. Helicopter training traffic, operating to/from runway and non-runway locations at Casement Aerodrome, particularly when Runway 28 (previously Runway 29) is active
  - 3. Helicopter traffic joining/departing Casement Aerodrome from/to South and South East and South West.
- c. New penetrations of the IHS should not be permitted unless the new object is shielded by an existing immovable obstacle or, after an aeronautical study, it is found not to have a negative impact on safety or regularity of operations.
- d. The Department of Defence is not satisfied that the Mill Road SHD will not negatively impact flight operations in the vicinity of Casement Aerodrome. The development will penetrate the IHS. There is no existing obstacle that meets the shielding criteria as described in the ICAO Airport Services Manual, Part 6 or the criteria contained within the IAA material. In addition, the Developer has not appeared to have considered or provided any documentation on this matter.
- e. Wildlife hazard
  - (1) Work methods and landscaping at the site should be such not to act as a bird attractant. Potential bird attractants include attenuation ponds, water amenities, landscaping, especially sowing of plant species which provide attractive food sources to birds, temporary features including landscaping work, broken ground, soil etc. These include the selection of trees and shrubs which do not produce fruit and seed desired by birds and avoiding the creation of areas of dense cover for roosting by flocking species of birds.  
If permission is granted, it should be a condition that appropriate management methods during construction should be employed to avoid sites becoming a bird attractant.
  - (2) Permission should not be granted to this development unless it has been demonstrated that it will not increase bird hazard to aircraft operating to/from Casement.



If permission is granted, it should be a condition that mitigating measures must be taken if negative effects on Irish Air Corps flight operations become apparent due to bird activity at the site.

f. Temporary hazards during construction.

- (1) Due to the proximity of the site to Casement Aerodrome, during construction, the use of cranes, other tall construction equipment, temporary lighting, equipment which could impact navigational aids and any activities likely to produce dust or smoke, must be managed to reduce any impact on regularity or safety of flight operations. Appropriate conditions should be applied to ensure that these temporary hazards do not pose a danger to aviation.
- (2) The operation of cranes at the site requires prior permission from Military Air Traffic Services in order to mitigate the impact on flight operations. In certain circumstances a Notice to Airmen (NOTAM) may be required to notify airspace users of the obstacle.

If permission is granted it should be a condition that crane activity at the site shall be con-ordinated with Military Air Traffic Services (ATS) at least 90 days in advance for assessment of proposed crane activities, contactable at [airspaceandobstacles@defenceforces.ie](mailto:airspaceandobstacles@defenceforces.ie).

g. Aviation Warning Lighting

- (1) Aviation obstacle lighting may be required as a temporary or permanent fixture by the Irish Air Corps, as the operators of Casement Aerodrome.  
If permission is granted, it should be a condition that an aviation obstacle warning lighting scheme for the development must be agreed with Military Air Traffic Services, contactable at [airspaceandobstacles@defenceforces.ie](mailto:airspaceandobstacles@defenceforces.ie).
- (2) It should be noted that Irish Air Corps lighting requirements are separate to any that may be specified by the Irish Aviation Authority, as civil or ICAO standards may not comply with requirements specific to military aviation such as those ensuring adequate visibility for military aircraft operating with Night Vision Equipment (NVE).
- (3) Where obstacle lighting is required, obstacle lights used should be incandescent or of a type visible to NVE. Obstacle lights 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.

h. Noise.



- (1) The planning authority should take account of the effects of aircraft noise as the site lies in close proximity to Casement Aerodrome.

#### 4. Summary.

- a. Part of the proposed development (Apartment Block A) penetrates the Inner Horizontal Obstacle Limitation Surface, established for Casement Aerodrome. New penetrations of the IHS should only be permitted where (1) the object is shielded by an existing immovable obstacle or (2) where an aeronautical study finds the object will not have a negative impact on the safety or regularity of operations.

- b. There is no existing obstacle that meets the ICAO shielding criteria and an aeronautical study has not been provided which satisfies the Minister for Defence that the Mill Road SHD will not have a negative impact on the safety or regularity of operations.

In the absence of such an aeronautical study, the Department of Defence objects to the proposed development.

- c. If permission is granted by the planning authority, the following conditions should be imposed:

- (1) Appropriate management methods during construction should be employed to avoid sites becoming a bird attractant.
- (2) Mitigating measures must be taken if negative effects on Irish Air Corps flight operations become apparent due to bird activity at the site.
- (3) Crane activity at the site shall be con-ordinated with Military Air Traffic Services (ATS) at least 90 days in advance for assessment of proposed crane activities, contactable at [airspaceandobstacles@defenceforces.ie](mailto:airspaceandobstacles@defenceforces.ie).
- (4) An aviation obstacle warning lighting scheme for the development must be agreed with Military Air Traffic Services, contactable at [airspaceandobstacles@defenceforces.ie](mailto:airspaceandobstacles@defenceforces.ie).

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

Yours faithfully,

*Sent via e-mail due to Covid19 restrictions*

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