



South Dublin County Council
Planning Department
County Hall,
Tallaght
Dublin 24
D24 YNN5

29th March 2022

Re: Objection to Planning Application ref: SD22A/0065

Dear Sir/Madam,

I write with regard to the above planning application by Rockface Development Limited for the construction of a warehouse building will have a maximum height of 15.5m. Located at Magna Avenue and Magna Drive, Citywest, Dublin 24.

The Department of Defence wishes to object to this proposed development for the following reasons:

- a. The International Civil Aviation Organisation (ICAO) is an agency of the United Nations. It sets out the 'Standards and Recommended Practices' (SARP'S) for international aviation through the publication of 19 annexes. ICAO Annex 14 deals with airport surfaces to be protected to ensure safe instrument flight procedures at airports. ICAO Annex 14 Obstacle Limitation Surfaces (OLS) are established at Casement Aerodrome.
- b. A 15m warehouse at the proposed development location will penetrate the Inner Horizontal Surface (IHS), which is intended to protect aircraft which are visually maneuvering in the vicinity of an aerodrome. This surface begins at 131.6m above mean sea level (AMSL). From the location information that is provided, it appears that the elevation of the site in question is approximately 125m. The planned warehouse will be 15m high giving a total height above sea level of 140m.
- c. 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.
- d. The Department of Defence is not satisfied that the proposed development will not negatively impact flight operations in the vicinity of Casement Aerodrome. 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. It is not known whether the Developer has considered or provided any documentation on this matter.
- e. In the event that this application is granted, the operation of cranes should be coordinated with Air Corps Air Traffic Services, no later than 28 days before use, contactable at airspaceandobstacles@defenceforces.ie or 01-4037681.
- f. As the authority on military aviation, the Department of Defence wish to have an Independent Aviation Assessment carried out and submitted to us for our appraisal.

The Minister for Defence requests an acknowledgement of this objection and to be kept informed of any developments in relation to this planning application, including any appeal.

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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