



5 August 2026

SOUTH DUBLIN COUNTY COUNCIL DEVELOPMENT PLAN: PROPOSED VARIATION NO 2.

Department of Defence wish to make a formal submission in relation to South Dublin County Development Plan 2022–2028 – Variation No. 2, which proposes to increase the amount of land available for development in the vicinity of the aerodrome, particularly within the Grange Castle, Citywest, Newcastle and Adamstown areas.

Annex A shows SDCC Variation 2 map of areas for zone change.

We also wish to resubmit the July 2021 Department of Defence submission to SDCC for Casement Aerodrome safeguarding. Attached for ease of reference.

The areas identified above lie within, or in close proximity to, the safeguarded airspace associated with Casement Aerodrome. Of particular concern is the proposed expansion of development at Grange Castle, which extends significantly closer to the approach to Runway 22 and the associated Public Safety Zone (Population Protection Area). Any increase in building heights or population density in these areas will directly impact Runway 22 approaches/ Runway 04 departures. It has the potential to erode the long-term operational capability of the aerodrome and constrain future aviation activities. Public Safety Zones are described in greater detail in the July 2021 safeguarding document.

Casement Aerodrome relies on each of its runways to fulfil a specific operational role. Runway 22 is the most frequently used runway, while Runway 10 and Runway 28 provide instrument approach procedures from the west and east respectively, ensuring continued access during all weather conditions. Runway 10/28 is also the aerodrome's longest runway and is essential for the operation of larger aircraft such as maritime patrol aircraft, ministerial air transport and foreign state flights. Should obstacle encroachment or incompatible development render this runway unusable or restrict its operation, these aircraft would no longer be able to operate safely from Casement Aerodrome, significantly reducing its military, governmental and emergency response capability.

The protection of the airspace surrounding Casement Aerodrome is an established international aviation safety requirement. Obstacle Limitation Surfaces (OLS), established under ICAO Annex 14 – Aerodromes, Volume I, and implemented through Commission Regulation (EU) No. 139/2014 and the associated EASA Certification Specifications (CS ADR-DSN), are intended to ensure that aircraft can safely take off, land and conduct instrument approach procedures. Development that penetrates these protected surfaces, or which increases risk within Public Safety Zones, can lead to operational restrictions, the withdrawal of instrument procedures, reduced runway availability and, ultimately, the loss of critical aviation capability to the state. A topical example of this is the sensitive state flights using Casement Aerodrome for the 2026 EU Presidency.

Given Casement Aerodrome's strategic national role, it is important that the proposed Development Plan Variation fully recognises the need to safeguard the aerodrome against both obstacle encroachment and inappropriate development. This formal submission is to seek to ensure that future zoning, building height policies and development proposals within the Grange Castle, Citywest, Newcastle and Adamstown areas remain compatible with the long-term operational requirements of the aerodrome and the internationally recognised aviation safety standards that govern its operation.

Any development within close proximity of Casement Aerodrome, especially the Grange Castle area must be appropriate and assessed against any impact to flight operations.

Grange Castle Rezoning Concerns

The approach area to Runway 22 is protected by a Public Safety Zone and associated Red Zone as described in Para 10 of the 2021 DoD submission to SDCC. This is a long standing position of the Air Corps to protect final approach segments to runways. This is common to most airports and while not an ICAO or EU standard, states will apply such protections.

- a. In the United States, the FAA refer to them as 'Runway Protection Zones'.
- b. In the UK, the CAA refer to them as 'Public Safety Control Zones/Restricted Zones'.
- c. In both the Netherlands and Italy, they have a recommended length of 1500m.

The Air Corps Recommends that the area underneath the approach surface for Runway 22 is not rezoned and remains 'green space' to protect the 1370m Red Zone for Runway 22 Casement Aerodrome as previously described in the 2021 SDCC submission. SDCC already has the equivalent Runway 28 area zoned for purposes other than development, the same approach should be applied to the land at Grange Castle for Runway 22.

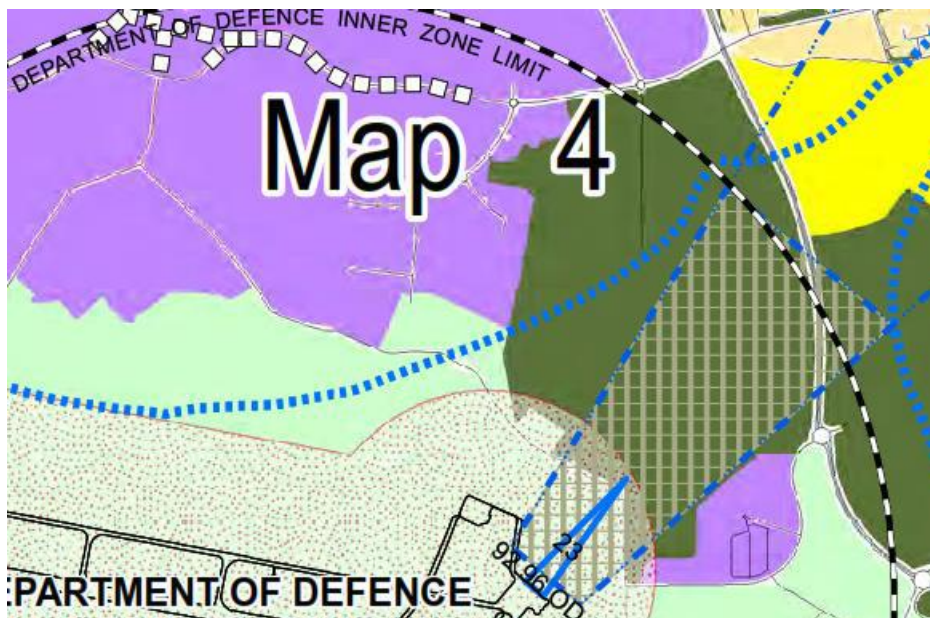


Figure 1: SDCC Development Plan map showing hatched/shaded area to remain unchanged.

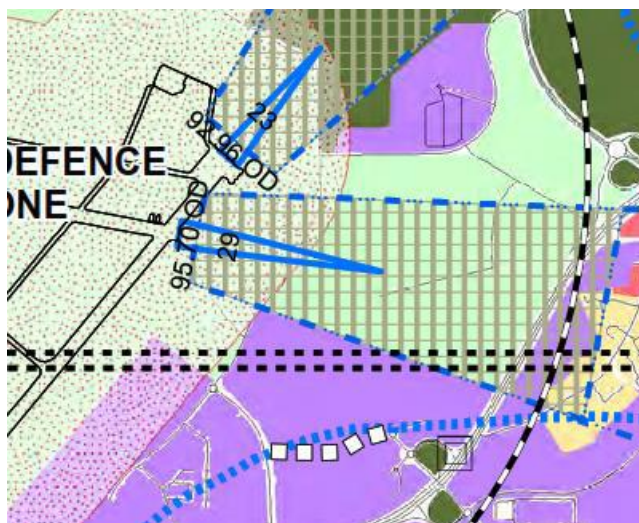


Figure 2: SDCC Development Plan map showing protected hatched area for Runway 28 approach.

Regarding the impact on the Communications Navigation and Surveillance (CNS) services here at Casement Aerodrome some consequences are highlighted below:

Navigational Aids for airports must be commissioned and calibrated regularly by a registered third-party calibration company to ensure they meet International Civil Aviation Organizations (ICAO) standards. Due to recent developments around the perimeter of Casement Aerodrome that have infringed on the ICAO EUR DOC 015 guidelines we have been unable to commission the aerodromes new DVOR/DME navigation aid. The original project cost was €1.1m. We have had to seek an additional €500k funding at HLPPG level, most of which will be for mitigation measures in a bid to bring the equipment online. At present we are 18 months overschedule and with an approximate 40% increase in cost, the majority of which is attributed to the developments within the CNS building restricted area. These issues will be replicated across all our comms and nav aids if the development continues to infringe on the recommended restricted area.

While GNSS is routinely used for approach and landings at commercial airports it is susceptible to jamming and spoofing. Given that Ireland is currently hosting the EU Presidency the flights landing into Baldonnel are prime target for these types of attacks. The 24/7 presence of the Garda Air Support Unit (GASU) is also another favourable target. The international aviation community has shifted its position quite significantly over the past few years with ground-based navigation aids now seen as a critical resilience essential in aviation. As such we must maintain our own independent ground based navigational aids for redundancy and autonomy, particularly with the nature of military operations.

CNS includes voice communications between aircraft and Air Traffic Services (ATS). Radio transmitters and receivers are also protected by the aforementioned ICAO document. If comms between aircraft and Air Traffic Control (ATC) fail it is regarded as a communications emergency and requires air traffic restrictions along with other emergency measures to be invoked. If ATC is unable to reliably communicate with aircraft in the vicinity that flight safety risks are significant. Raising antenna heights is limited as they would then penetrate obstacle limitation surfaces. Airports don't tend to be located in densely populated areas because of these restrictions.

Navigation Aids are particularly important when weather and night reduce visibility. During these periods aircraft are unable to fly Visual Flight Rules (VFR) and must navigate using their instruments and published procedures which rely on ground-based navigation aids and GNSS. Casement Aerodrome is open and operational 24/7 which means that a significant portion of the year requires pilots to fly Instrument Flight Rules (IFR). Given the previously mentioned risks with GNSS it is essential that ground-based navigation aids are available to aircraft landing at Baldonnel. Unlike many other industries that accept an element of risk it's very difficult to accept risk in aviation as the consequences can be so catastrophic.

The Department of Defence and the Air Corps are not opposed to the zoning change of land surrounding Casement Aerodrome as outlined in SDCC Development Plan, Variation No. 2. Rather, it seeks to ensure that SDCC fully recognises and incorporates Casement Aerodrome safeguarding requirements into the planning process. This is essential that future development remains compatible with the safe and efficient flight operations for domestic and foreign aircraft operating at Casement Aerodrome.

Annex A

