



Limerick Flying Club,
Coonagh Airfield,
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**Planning Department
Clare County Council
Ennis
Co Clare**

25th March 2022

To whom it may concern:

Re: Clare County Development Plan 2023-2029

I write on behalf of Limerick Flying Club, its members and stakeholders. We have become aware of the above noted Development Plan which includes proposals for wind turbines in an area north of Coonagh Aerodrome, Limerick City and west of Ardnacrusha.

To this end I enclose some observations on the possible impact of wind turbines so close to our aerodrome and general area of flight operations.

We presume the Local Authority will engage with the Irish Aviation Authority in the matter.

Please confirm receipt hereof to the writer's email below. Many thanks.

Yours sincerely

**Harry McNamara
Chairman
Limerick Flying Club**

Email:

Phone:

CC: Aerodrome Licensing Section, Irish Aviation Authority

Submission by Limerick Flying Club (Coonagh) CLG t/a Limerick Flying Club on County Clare Draft Development Plan 2023-2029

WHO IS MAKING THIS OBSERVATION?

Limerick Flying Club (Legal structure and ownership of the club and lands)

- Limerick Flying Club (Coonagh) CLG, CRO # 130693, Coonagh Aerodrome, Ennis Road, Limerick, V94 H2HF.
- The club is a not-for-profit company which has operated a flying club providing professional flight training and recreational aviation facilities at Coonagh since 1971.
- Coonagh Aerodrome has operated continuously since 1947 where the main hangar is a protected structure.
- The club is the occupier and operator of Coonagh on foot of Aerodrome Licence # 102 issued by the Irish Aviation Authority (IAA)
- We have previously provided Clare County Council with an Aerodrome Safeguarding Map in April 2021 on the advice of the Irish Aviation Authority.

The licence is subject to an annual review without which the club cannot conduct flight training. A condition of the renewal process is the operator's ability to:

Conduct all of its operations safely and in compliance with all regulations promulgated by European Union Aviation Safety Agency (EASA) and the Irish Aviation Authority.

ON WHAT BASIS IS THIS SUBMISSION BEING MADE?

Limerick Flying Club and its stakeholders have given consideration to potential impact on our operations at Coonagh as a result of the full adoption and implementation of the Draft Development Plan 2023-2029 for County Clare. Our specific concern relates to the Strategic Area (Wind Energy) and Acceptable in principle area (Wind Energy) as set out on Page 7 Volume 2 Maps which are located in South East County Clare. Specifically, we wish to comment on the area north of Coonagh Aerodrome, Limerick City and West of Ardnacrusha.

WHAT ARE THE SPECIFIC REASONS FOR THIS SUBMISSION?

At the outset we have no issues with the development of wind energy as an alternative source of power.

There are numerous studies across the globe studying the impact of wind turbines and their potential to disrupt the air mass downwind of the turbine's operations.

We presume the Local Authority is aware that these wind turbines will be located within Class C Airspace as defined by the Irish Aviation Authority and controlled by Shannon Air Traffic Control. However, the area from O'Brien's Bridge southwest to a point just west of Coonagh is Class G Airspace and is uncontrolled up to 1,000 feet above mean sea level.

The area around the city of Limerick is Prohibited Airspace called P9. This is a restriction imposed by the State as enhanced security for the prison complex in Limerick City.

When light aircraft are coming into Coonagh and Shannon or departing to the north east within this area (following the headrace to Ardnacrusha Power Station), these aircraft are funneled through a gap bounded by Shannon Class C Airspace to the West / North of the route and the restricted Airspace over Limerick City (P9) to the east and south.

Some reports suggest there can be disruption to the airmass 3 to 5 km downwind of wind turbines. The extent of the disruption is influenced by the size and height of the turbine. As a consequence, this has the potential to cause disruption to the airmass at Coonagh Aerodrome which is about 4 km's south of the southern reaches of the proposed Strategic Area.

This will be particularly relevant if the prevailing winds are westerly or northerly. It could also impact light aircraft and helicopters which pass through this funnel every day particularly when close to Ardnacrusha and Parteen.

WHAT IS OUR PROPOSAL IN THE MATTER?

Pilots of light aircraft and helicopters do not have alternative routes other than to route further east and south around Limerick City. However, the most expedient routing is through the gap north of the city following the Ardnacrusha headrace, passing over Parteen and in close proximity to Meelick and Kilkishen all of which are extremely close to the proposed Strategic Area for Wind Energy.

In making a decision to zone this specific area for wind energy, we ask the Local Authority to be cognisant of the various reports and studies on the potential impact of wind turbines on light aircraft and helicopters operating in close proximity to such facilities.

Finally, we would hope that the Local Authority will consult widely with the Irish Aviation Authority and relevant experts in the matter. Such expertise would I imagine be available from the Aeronautical Engineering Faculty at the University of Limerick.

Contact

For queries and responses to this submission of observation contact details are in the covering letter.

25th March 2022