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AVIATION GLINT AND GLARE SCREENING ASSESSMENT

Proposed Solar PV Energy Installation

LRD at Greenfields, Swords, Co. Dublin.

Prepared by Macro Works Ltd

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Registered Landscape Architect

1. AVIATION GLINT AND GLARE ASSESSMENT

1.1 INTRODUCTION

This Glint and Glare Screening Assessment was carried out by Macro Works Ltd to determine the potential for solar reflectance effects upon aviation receptors in respect of proposed roof-mounted solar PV installations on the roofs of multiple proposed buildings as part of a proposed large residential development at Greenfields, Swords, Co. Dublin. Figure 1.1 and Figure 1.2 refer.

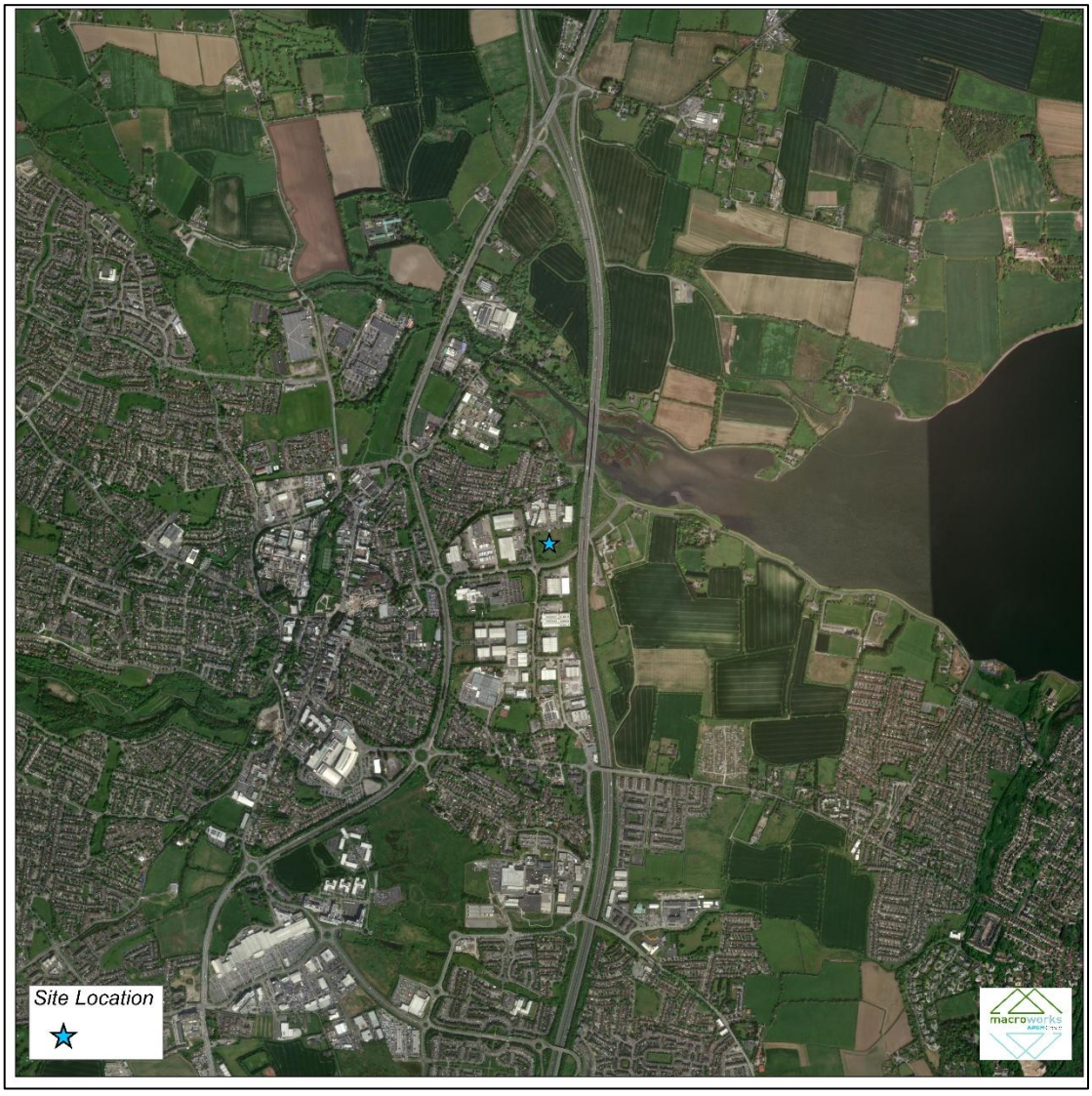


Figure 1.1 Aerial view indicating the location of the proposed PV panels

Figure 1.2 Extract from drawing no. SWO-MCORM-AR-00-DR-P3-1004 "Site Plan" showing the proposed site and panel layout.

1.1.1 Statement of Authority

Macro Works' relevant experience includes twenty years of analysing the visual effects of a wide range of infrastructural and commercial development types. This experience includes numerous domestic and international wind and solar energy developments.

1.1.2 Guidance and Best Practice

The Irish Aviation Authority (IAA) has not published any specific guidance on solar PV developments. The IAA identifies the need to ensure safety in relation to potential reflectance effects emitting from solar developments and highlights the potential for an ocular assessment to be requested.[1] The European Union Aviation Safety Authority (EASA) requires an assessment of the luminance of proposed PV panels, rather than by ocular irradiance, so as not to dazzle air traffic controllers to the extent of a reduction in visual perception of airport operations.[2] EASA found that 20,000 cd/m2 was the maximum acceptable luminance value for solar PV arrays in the vicinity of an aviation receptor. As the IAA refer to the need for an ocular assessment, this analysis will focus on potential ocular effects.

[1] Irish Aviation Authority. (2025). IAA - National Aviation Safeguarding Framework, Consultation Document, p. 30.

2 European Union Aviation Safety Agency. (2025). Certification Specifications and Guidance Material for Aerodrome Design (CS-ADR-DSN). Issue 7. Page 161. https://www.easa.europa.eu/en/document-library/certification-specifications/group/cs-adr-dsn-aerodromes-design?utm_source=chatgpt.com#cs-adr-dsn-aerodromes-design.

The sequence of guidance developed by the United States Federal Aviation Administration (FAA) to address the potential hazards that solar developments may pose to aviation activities, is considered the most comprehensive for the purposes of assessment of solar developments near aerodromes. The initial guidance was prepared in 2010 (entitled 'Technical Guidance for Evaluating Selected Solar Technologies on Airports' (archived)), was subsequently updated in 2013[3] (entitled 'Interim Policy, FAA Review of Solar Energy System Projects on Federally Obligated Airports'). The most current version of the guidance (Version 1.1) 'Technical Guidance for Evaluating Selected Solar Technologies on Airports' was released in 2018.[4]

The SGHAT was developed in conjunction with the FAA in harmony with this guidance and is adopted as the standard for measuring the ocular impact of solar developments. Furthermore, it is commonly regarded as the accepted industry standard by aviation authorities internationally when considering the glint and glare effects upon aviation-related receptors.

There is currently no aviation-authority guidance from either the IAA, FAA or EASA that specifically addresses glint and glare impacts from solar installations in relation to helipads or heliports. Existing guidance and policy documents are primarily framed around fixed-wing aircraft operations at aerodromes, with a focus on potential ocular impacts to pilots and air traffic controllers during critical phases of flight. In the absence of helipad-specific criteria, it is best practice to apply the same underlying aviation safety principles to helicopter operations, namely that reflections from solar panels should not result in distracting or hazardous glare that could impair pilot vision during approach, landing, take-off or departure.

By virtue of their efficiency, the intensity of reflected light from modern PV solar panels is deliberately low and currently equates with that of the reflection from still water. Recent studies generally agree, however, that there still exists the potential for hazard or nuisance upon surrounding receptors. Macro Works' glint and glare analysis methods and determination of effects are based on a combination of available studies and established best practice. This methodology has been successfully implemented on numerous previous solar farm projects that met with the approval of various Planning Authorities

Federal Aviation Authority

Within the FAA's interim policy, a 'Review of Solar Energy System Projects on Federally Obligated Airports'[5] it states:

> *"To obtain FAA approval to revise an airport layout plan to depict a solar installation and/or a ''no objection'' to a Notice of Proposed Construction Form 7460–1, the airport sponsor will be required to demonstrate that the proposed solar energy system meets the following standards:*
>
> *No potential for glint or glare in the existing or planned Airport Traffic Control Tower (ATCT) cab, and*

3 Interim Policy, FAA Review of Solar Energy System Projects on Federally Obligated Airports, Department of Transportation, Federal Aviation Administration, date: 10/2013

4 Technical Guidance for Evaluating Selected Solar Technologies on Airports, Federal Aviation Administration (FAA), date: 04/2018

5 Federal Aviation Administration (FAA). (2013). Department of Transportation - Federal Aviation Administration. Interim Policy, FAA Review of Solar Energy System Projects on Federally Obligated Airports. Vol 78 (No 205), 63276-63279. Available at: https://www.federalregister.gov/documents/2013/10/23/2013-24729/interim-policy-faa-review-of-solar-energy-system-projects-on-federally-obligated-airports

No potential for glare or ''low potential for after-image'' (shown in green in Figure 1[Figure 1.3 refers]) along the final approach path for any existing landing threshold or future landing thresholds (including any planned interim phases of the landing thresholds) as shown on the current FAA-approved Airport Layout Plan (ALP). The final approach path is defined as two (2) miles from fifty (50) feet above the landing threshold using a standard three (3) degree glidepath."

An update of the policy in 2021[6] replaced this interim policy, with the key amendment of deprioritising runway approaches as critical aviation receptors, citing the following;

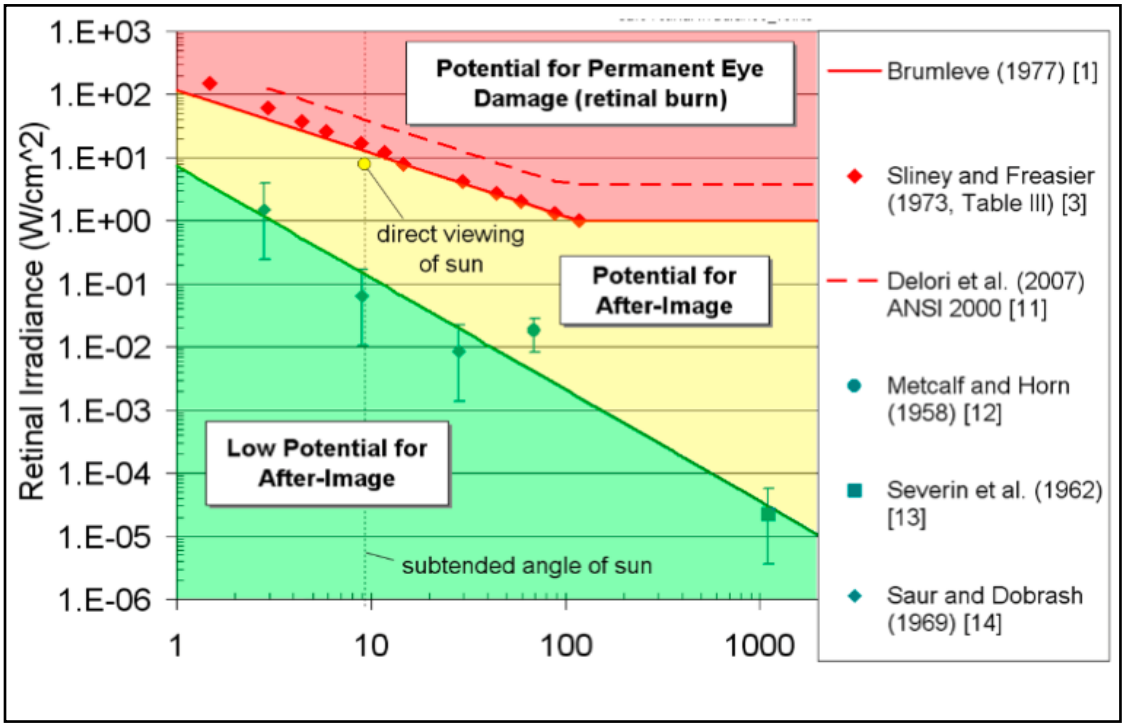
"Initially, FAA believed that solar energy systems could introduce a novel glint and glare effect to pilots on final approach. FAA has subsequently concluded that in most cases, the glint and glare from solar energy systems to pilots on final approach is similar to glint and glare pilots routinely experience from water bodies, glass-façade buildings, parking lots, and similar features. However, FAA has continued to receive reports of potential glint and glare from on-airport solar energy systems on personnel working in ATCT cabs. Therefore, FAA has determined the scope of agency policy should be focused on the impact of on-airport solar energy systems to federally-obligated towered airports, specifically the airport's ATCT" (Federal Aviation Administration 05/11/2021).

In summary, glare at an ATCT is not acceptable and while still relevant glare with a ''low potential for after-image'' is generally acceptable along final approach paths to runways in most instances.

Solar Glare Hazard Analysis Tool

The SGHAT was designed to determine whether a proposed solar energy project would result in the potential for ocular impact as depicted on the Solar Glare Hazard Analysis Plot (Figure 1.3 refers). SGHAT analyses ocular impact over the entire calendar year in one minute intervals from when the sun rises above the horizon until the sun sets below the horizon. One of the principal outputs from the SGHAT report is a glare plot per receptor that indicates the time of day and days per year that glare has the potential to occur. SGHAT plot classifies the intensity of ocular impact as either Green Glare, Yellow Glare or Red Glare. These colour classifications are equivalent to the FAA's definitions regarding the level of ocular impact e.g. 'Green Glare' in the SGHAT is synonymous to the FAA's ''low potential for after-image',' and so forth. The various correlations are illustrated on the Solar Glare Hazard Analysis Plot.

6 Federal Aviation Administration Policy: Review of Solar Energy System Projects on Federally-Obligated Airports; date: 11/2021



Solar Glare Ocular Hazard Plot: The potential ocular hazard from solar glare is a function of retinal irradiance and the subtended angle (size/distance) of the glare source. It should be noted that the ratio of spectrally weighted solar illuminance to solar irradiance at the earth's surface yields a conversion factor of ~100 lumens/W. Plot adapted from Ho et al., 2011.

Chart References: Ho, C.K., C.M. Ghanbari, and R.B. Diver, 2011, Methodology to Assess Potential Glint and Glare Hazards from Concentrating Solar Power Plants: Analytical Models and Experimental Validation, J. Solar Energy Engineering, August 2011, Vol. 133, 031021-1 – 031021-9.

Figure 1.3 - Figure 1 from the FAA Interim Policy, FAA Review of Solar Energy System Projects on Federally Obligated Airports

1.2 METHODOLOGY

The process for dealing with aviation receptors is as follows:

1. The Federal Aviation Administration (FAA) approved Solar Glare Hazard Analysis Tool (SGHAT) is used to determine if any of these aviation receptors has the potential to theoretically experience glint or glare. This tool also calculates the intensity of such reflectance and whether it is acceptable by FAA standards.

2. SGHAT does not account for terrain screening or screening provided by surface elements such as existing vegetation or buildings, therefore the results of the SGHAT may need to be considered, in conjunction with an assessment of existing intervening screening that may be present, to establish if reflectance can actually be experienced at the receptors.

3. Finally, if necessary, additional assessment is undertaken using Macro Works' bespoke model which would into account any screening provided by any proposed mitigation measures.

1.2.1 Identification of Relevant Receptors

In accordance with current IAA and DAA protocol 10 km and 15 km radius study areas were established for the identification of IAA registered aerodromes and main airports respectively, that might require testing for glint and glare impacts. However, there are no IAA registered aerodromes within the 10 km aviation study area and neither of DAA's Dublin or Cork airports occur within 15 km of the proposed solar development. For these reasons, no further aviation analysis was undertaken.

Furthermore, the Planning and Development (Solar Safeguarding Zone) Regulations 2022 set out 43 Solar Safeguarding Zones (SSZs). A SSZ is an area around an airport, aerodrome or helipad in which there is a potential for glint or glare from solar panels to impact aviation safety. The proposed development is not located within any of the defined SSZs, and therefore, an aviation-based glint and glare analysis was scoped out for further assessment.

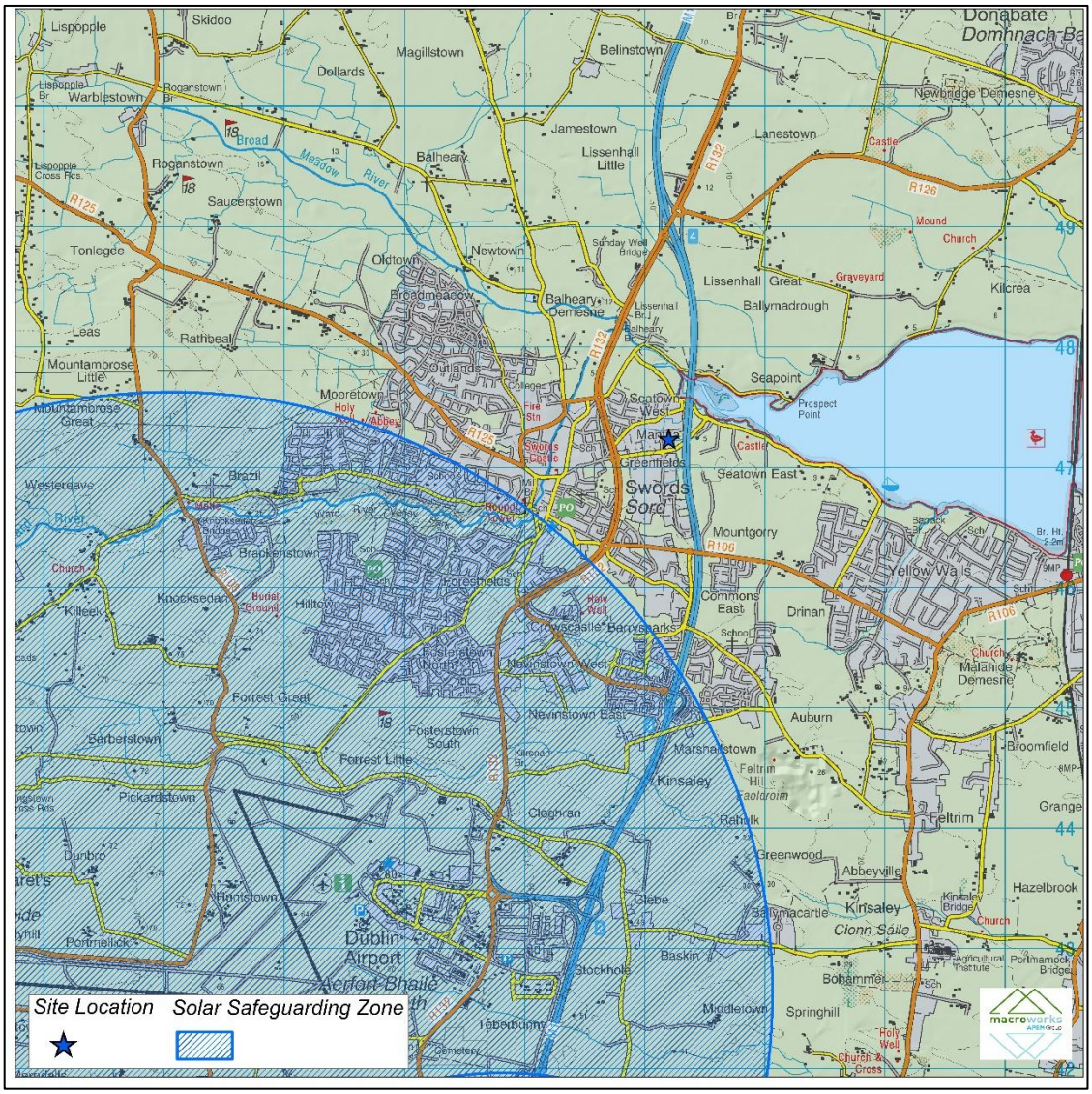


Figure 1.4 Map showing the approximate location of the proposed development relative to the nearest Solar Safeguarding Zone(s).

1.3 OVERALL CONCLUSION

The need for a SGHAT assessment was screened out as the proposed development at Greenfields, Swords, Co. Dublin, is not contained within a designated Solar Safeguarding Zone. On review of the PV panel and roof layout, no further investigation was deemed necessary.