



Appendix 1

Correspondence between Orsted's Legal Team and AirNav Ireland

Charlie O'Loughlin
Manager Surveillance M&E Systems
AirNav Ireland
charlie.oloughlin@airnav.ie

BY EMAIL ONLY

1 October 2025

Your ref:

Our ref: 45119.34

MHC-38561812-1

Matter: Oatfield Wind Farm
Our Client: Orsted Onshore Ireland Midco Limited

Dear Mr O'Loughlin

We confirm we have been instructed by our Client in relation to its pending application for planning permission for the construction Oatfield Wind Farm in County Clare (the **"Proposed Development"**) and in particular your recent engagement with our Client in relation to radar data files.

1 Planning history

By way of background, a strategic infrastructure development ("**SID**") planning application was submitted by our Client to An Bord Pleanála, the predecessor of An Coimisiún Pleanála (together, the "**Commission**") on 22 December 2023 for the Proposed Development (reference number 318782-24). Chapter 11 of the environmental impact assessment report submitted with the application was entitled Material Assets and included an Aviation Review Statement prepared by Ai Bridges and Cyrrus Limited ("**Cyrrus**") at Appendix 11.2.

AirNav Ireland ("**AirNav**") submitted an observation in respect of the Proposed Development dated 24 January 2024 entitled "*Observation on the Strategic Infrastructure Development Application submitted by AirNav Ireland (Re: Reference PA03.318782 Oatfield Wind Farm within townlands of Co. Clare)*". Our Client submitted their response to submissions on 19 June 2024, including a response prepared by Ai Bridges and Cyrrus to AirNav's submission at appendix 1.

The Commission issued a request for further information ("**RFI**") to our Client on 17 January 2025. Item 1 of the RFI is as follows:

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Partners - William Carmody (Managing) | Philip Nolan (Chair) | Catherine Allen | Julie Austin | Declan Black | Rebecca Boland | Ron Boucher | Kim Bowen | Domhnall Breatnach | Sonya Bruen | Alan Burns
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“Significant concerns in relation to aviation safety have arisen given the relationship of the proposed development to Instrument Flight Procedures (IFP), the Air Traffic Control Surveillance Minimum Altitude Coordinates (ATC SMAC) and the Woodcock Hill Radar as set out in the observations received by the Board from Irish Aviation Authority (IAA), Shannon Airport Authority DAC with additional information from AirNav Ireland. Notwithstanding the applicant’s response to the observations received and the technical report provided, the applicant is requested to review these submissions further and demonstrate that sufficient consultation with Irish Aviation Authority (IAA), Shannon Airport Authority DAC and AirNav Ireland has been undertaken and all aviation concerns have been addressed to their satisfaction”.

Our Client submitted a response to the RFI on 23 May 2025 which included a technical response prepared by Ai Bridges at appendix 1. The technical response sought to address the submissions made by the Irish Aviation Authority (the “**IAA**”), Shannon Airport Authority DAC and AirNav as requested by item 1 of the RFI.

2 Engagement with IAA/AirNav

Our Client has facilitated open and proactive consultation on aviation matters from the inception of the Project, with Brookfield Renewable Ireland (“**Brookfield**”), the original developer of the Proposed Development. having first engaged with the IAA in 2016 to discuss the initial iteration of Oatfield Wind Farm. Brookfield continued to engage with the IAA from 2016 – 2018 and a number of detailed technical assessments were carried out at the request of the IAA. Brookfield’s interest in Oatfield Wind Farm was acquired by our Client in 2021.

Following on from the initial engagement, a consultation occurred in September 2023 between our Client and the Airspace and Navigation Team at AirNav. The areas of instrument flight procedures and radar surveillance systems safeguarding were identified by AirNav as specific areas of concern. AirNav stated during the September 2023 consultation that, in their opinion, the proposed development would affect the operation of the monopulse secondary surveillance radar at Woodcock Hill. In response, in December 2023, Ai Bridges was commissioned by our Client to carry out a radar surveillance screening assessment for all of the radar equipment and sensors located in the vicinity of Shannon Airport and Woodcock Hill.

Subsequent to receipt of the RFI, stakeholder meetings were held between our Client, RSK Ireland and Ai Bridges with AirNav on 29 January 2025 and 19 February 2025 and with Shannon Airport Authority on 25 February 2025. A joint stakeholder call between our Client, RSK Ireland, Ai Bridges, Cyrrus, the IAA, AirNav and Shannon Airport Authority was held on 20 May 2025. We are instructed that it was confirmed at this last meeting that the issue of deflections was the primary outstanding aviation concern in respect of the Proposed Development and that more studies were required to confirm that this would not be an issue for the Proposed Development.

It was agreed at the 20 May 2025 meeting that AirNav would provide sample radar files illustrating the deflection issues to Cyrrus in order for Cyrrus to investigate the issue further and report on the results of its analysis.

As set out in the email of 6 June 2025 from Kevin Hayes of Ai Bridges to you, following up on the meeting of 20 May 2025:

“The Wind Farm Developer, Orsted, is very keen to complete this additional technical assessment of one of the outstanding concerns that AirNav still have in relation to issue of deflections.

As discussed on the Teams Meeting, one of the agreed actions was that Cyrrus would carry out a software analysis of the radar data files (reflector files) to allow an analysis the Woodcock Hill data. To conduct this analysis Cyrrus requested the radar data files and it was agreed that this data could be provided

To this end the following data files would be required

- The ASTERIX Files received by the ARTAS MRT system from each of the radars used to compose their combined radar picture.

- Either the callsign or IATA code and the time that the Woodcock Hill radar data displayed a deflected target which caused a Short Term Conflict Alert.

- Each of the radars whose data is provided, including location and antenna height. This is required to accurately plot the aircraft position.

We would be grateful if you could provide this data so that Cyrrus could carry out their software analysis and revert with their findings on the instance of where deflections occurred

If you have any queries please do not hesitate to contact me.”

[Emphasis added]

As you will be aware, our client has continued to engage with you to obtain the aforementioned data, with follow-up emails issued on 19 June, 22 July, 30 July and 1 September 2025 from Kevin Hayes, Ai Bridges, requesting that the radar data be shared, as agreed. We are informed that to date, despite initial assurances that delays arose due to capacity issues¹, no radar data has been forthcoming to Ai Bridges or Cyrrus, as was explicitly agreed at the meeting of 20 May 2025.

Further consultation took place this month, by both telephone and email. By email dated 4 September 2025, Kevin Hayes shared a “Mitigation Options Study Report” prepared by

¹Email of 20 June 2025 at 12.21 from Charlie O’Loughlin, AirNav – *“I apologise that I haven’t gotten back to you or Cyrrus in relation to deflected targets displayed on the Woodcock Hill Radar. We have been and continue to be, fully occupied with regulatory issues related to Dublin Radars. I will get back you on this once we have some available time to progress this.”*

Cyrrus in May 2025 as well as our Client's response to AirNav's observations submitted to the Commission.

On 16 September 2025, you replied to Kevin Hayes by email as follows:

"The attached "AirNav Surveillance description of Woodcock Hill Radar deflections 10 July 2025", is the file illustrating clearly the deflection issues we have experienced in Woodcock Hill outlined in our meeting of 20 May 2025.

It has been compiled by our certified radar specialist with over 25 years' experience of working with radars that includes such radar analysis.

I remain open to receiving from you evidence to support the assertion that wind turbines which are over 150m high at 2.5-4km and fully visible by an En-Route radar do not cause radar track deflection issues. As you are aware, based on the available technological analysis, this position is not shared by AirNav Ireland.

Again, I would like to highlight that "Key Notes on Meeting with IAA, AirNav Ireland and Shannon Airport Authority on Date: 20th May 2025 Time.15.00 to 16.30 pm", are notes taken by the wind development side, and were not reviewed by AirNav Ireland and are not agreed minutes / actions arising from that meeting."

It is noted that the above email purports that the meeting minutes of the 20 May 2025 were not agreed by AirNav. However, it is clear from both the meeting minutes and the subsequent email and telephone correspondence on the matter with your office, that the agreed action from the Joint Stakeholder meeting on the 20 May was that the deflections data would be provided by AirNav.

3 Request for radar data

It has been stated in the email of 16 September that AirNav are open to receiving evidence in relation to the purported radar track deflection issues. However, a meaningful analysis of the reported deflections issue cannot be prepared in the absence of the required data, in the format requested in Kevin Hayes' email of 6 June 2025.

In order for our Client and their advisors to undertake an analysis of the deflections issue, they require that the radar data be furnished as a matter of priority. It is now over 4 months since AirNav agreed to provide this data and the delay in providing same is obstructing our Client from effectively engaging on and addressing the issues raised by AirNav.

In order to avoid further delay, please furnish the requested data by **8 October 2025**.



We await hearing from you.

Your sincerely

Sent by email, no signature

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BY EMAIL ONLY

31 October 2025

Your ref:

Our ref: 45119.34

MHC-38788321-1

Matter: Oatfield Wind Farm
Our Client: Orsted Onshore Ireland Midco Limited

Dear Mr O'Loughlin

We refer to the above matter, in particular our letter of 1 October 2025 requesting the data referred to therein no later than 8 October 2025.

We note, that as of today's date, despite following up by email, no response, data or indeed acknowledgement to our letter has been received.

As set out in our letter of 1 October, our client requires the data to undertake an analysis of the deflections issue. AirNav's ongoing lack of engagement and delay in providing this data is obstructing our client from effectively engaging on and addressing the issues raised by you.

In the circumstances, in particular where our client is now in receipt of another further information request on the matter, as enclosed, this is directly prejudicing our client and is unacceptable conduct from a public body.

We request a response as a matter of priority, and no later than **Tuesday 4th November 2025**.

We await hearing from you as a matter of the utmost urgency.

Your sincerely

Sent by email, no signature

MASON HAYES & CURRAN LLP

Dublin

London

New York

San Francisco

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31st October 2025

FAO: Elaine Keating
Mason Hayes and Curran
Barrow Street
Dublin 4
By email only

Dear Sirs

We refer to the above and your letter dated 1 October with the request for:

- ***The ASTERIX Files received by the ARTAS MRT system from each of the radars used to compose their combined radar picture.***
- ***Either the callsign or IATA code and the time that the Woodcock Hill radar data displayed a deflected target which caused a Short-Term Conflict Alert.***
- ***Each of the radars whose data is provided, including location and antenna height. This is required to accurately plot the aircraft position.***

(hereinafter collectively referred to as Additional Technical Information)

The request for Additional Technical Information has been considered, and the information relating to [***Each of the radars whose data is provided, including location and antenna height. This is required to accurately plot the aircraft position***] is provided in Schedule 1, enclosed herewith.

Having considered the request for the other two categories of Additional Technical Information, we respond to each as follows:

Regarding '***the callsign or IATA code and the time that the Woodcock Hill radar data displayed a deflected target which caused a Short-Term Conflict Alert***' we advise that the specific records requested do not exist.

Regarding the '***ASTERIX Files received by the ARTAS MRT system from each of the radars used to compose their combined radar picture***'. This information

cannot be provided due to its sensitive nature as it contains national security (military) operations.

The assertion that AirNav Ireland gave a commitment or undertaking to provide the Additional Technical Information, as set out in your letter, is denied. This is confirmed in the responses that clearly state that AirNav Ireland did not agree on the minutes, that your client seeks to rely on, to make such assertions. Furthermore, the correspondence merely indicates that the request for information was being considered, not that it would be provided.

AirNav Ireland is satisfied that the information included with this correspondence, and that was previously provided to your client, sufficiently addresses any onus that may exist to provide technical justification that the proposed wind farm development should not proceed in the locations sought.

The obligation on wind farm developers is to ensure that such structures do not impact on ANSP infrastructure. The threat posed by the proposed wind farm development to AirNav Ireland's infrastructure has already been clearly stated in the data and analysis provided by AirNav Ireland.

We wish to inform you, and as you may be aware, the information you seek may be available under the provisions of the Freedom of Information Act. Under this legislation, individuals have the right to access records held by public bodies, subject to certain exemptions. Should your client wish to proceed with such a request, you may submit a formal request under the Freedom of Information Act. To assist you, please ensure that your request: is made in writing (email or post), clearly states that it is being made under the Freedom of Information Act, and provides sufficient detail to enable us to identify the records sought.

Requests can be sent to: the Freedom of Information Officer, AirNav Ireland, 11-12 The Times Building, D'Olier Street, Dublin 2 or by email to foi@airnav.ie

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ewan Murtagh', written in a cursive style.

Ewan Murtagh
Company Secretary

Operational Status of Radar Installations

The following table provides details on the operational status of AirNav radar installations across various counties. Each radar is listed with its corresponding location, operational status, and radar models deployed at the site.

Radar	County	Operational Status	Radar Models
Malin	Donegal	Operational	RSM970S CIRIUS
Dooncarton	Mayo	Operational	RSM970S CIRIUS
Forrest Little	Dublin	Operational	RSM970S CIRIUS
Tooman	Dublin	Operational	RSM970S CIRIUS & PSR STAR2000
Dublin 3	Dublin	Operational	RSM970S CIRIUS & PSR STAR2000
Woodcock Hill	Clare	Operational	RSM970S CIRIUS
Shannon	Clare	Operational	RSM970S CIRIUS & PSR STAR2000
Tullig More	Cork	Operational	RSM970S CIRIUS & PSR STAR2000
Mt Gabriel 1	Cork	Operational	RSM970S CIRIUS
Mt Gabriel 2	Cork	Operational	RSM970S CIRIUS

Radar Locations and Physical Characteristics

This section lists the geographic coordinates and elevation above sea level for each radar installation.

Radar	Lat (N)	Long (W)	Height (m)
Malin	55° 21' 18.4"	7° 16' 27.7"	285
Dooncarton	54° 16' 21.7"	09° 49' 36.82"	263.9
Forrest Little	53° 26' 21.12"	06° 15' 9.00"W	65
Tooman	53° 33' 20.0"	06° 15' 03.0"	125
Dublin 3	53° 26' 22"	6° 15' 25"	68
Woodcock Hill	52° 43' 15.77"	08° 42' 26.78"	307.8
Shannon	52° 42' 5.03"	8° 56' 11.74"	14.3
Tullig More	51° 49' 19.4"	08° 31' 17.92"	165
Mt Gabriel 1	51° 33' 26.53"	9° 32' 30.03"	404
Mt Gabriel 2	51° 33' 22.10"	9° 32' 35.17"	404

Radar Antenna Height Above Ground Level

The following table provides information on the heights of primary and secondary radar antennas above ground level.

Radar	Primary Antenna	Secondary Antenna
Malin		10m
Dooncarton		17.57m

Forrest Little		28m
Tooman	28m	31m
Dublin 3	12.5m	15m
Woodcock Hill		10m
Shannon	18.8m	21.3m
Tullig More, Cork	12m	16m
Mt Gabriel 1		10m
Mt Gabriel 2		9m

Secondary Radar Specifications

Interrogation Modes, Rotation Periods, and Maximum Ranges

Details regarding secondary radar interrogation modes, antenna rotation periods (in seconds), and maximum operational ranges (in nautical miles) are outlined below for each radar site.

Radar	Interrogation Mode	Rotation Period	Max Range (NM)
Malin	SSR Mode A/C	5.8	256
Dooncarton	SSR Mode A/C	5.8	256
Forrest Little	Mode-S	4	150
Tooman	Mode-S	4	256 (PSR 60)
Dublin 3	Mode-S	4	150 (PSR 60)
Woodcock Hill	Mode-S	5.8	256
Shannon	SSR Mode A/C	4	250 (PSR 60)
Tullig More, Cork	SSR Mode A/C	4	256 (PSR 60)
Mt Gabriel 1	Mode S	5.8	256
Mt Gabriel 2	SSR Mode A/C	5.8	256

RSM 970S Technical Characteristics

General Specifications

- Interrogation frequency: 1030 MHz \pm 0.01 MHz
- Reception frequency: 1090 MHz \pm 3 MHz
- Transmitter peak power: 2570 W
- VSWR: < 1.5 (cabinet output)
- Isolation between channels: > 70 dB
- RF change over switching time: < 100 ms

Transmitter Duty Cycle

- Capable of maximum ICAO interrogation rates for Mode S
- At least 5% long-term duty cycle
- 63.7% over 2.4 ms (48 Mode S interrogations within 2.4 ms, one interrogation every 50 μ s); can repeat this cycle every 24 ms

- 96 long Mode S interrogations within 4.8 ms, one interrogation every 50 μ s

RSM 970S Power Budget Parameters

- Transmitted power at the output of the transmitter: 2,570 W (64.1 dBm)
- Transmitted frequency: 1,030 MHz (wavelength = 29.12 cm)
- Processing threshold: -84 dBm (input to receiver)

AS 909 Secondary Antenna Specifications

- Maximum antenna gain: 27.0 dB isotropic
- Gain decrease at 0.5° above horizon: -6.0 dB relative to maximum gain

System Losses

- Uplink (transmitter output to antenna input): 4.2 dB
- Downlink (antenna output to receiver input): 4.2 dB

Details of Downlink Losses

- Inside cabinet RF losses: 1.3 dB
- Transfer RF unit switches losses: 0.7 dB
- Diplexer losses: 0.3 dB
- RF cable losses from cabinet output to rotary joint input: 1.65 dB (typical)
- Connectors and interconnection cable losses: 0.75 dB
- Cable losses: 0.9 dB (assuming a 25m 13/50, or a 32m 17/50 cellular dielectric coaxial cable)

Ewan Murtagh
Company Secretary
AirNav Ireland
Ewan.Murtagh@airnav.ie; Deirdre.Conway@airnav.ie

BY EMAIL ONLY

7 November 2025

Your ref:

Our ref: 45119.34

MHC-38960791-1

Matter: Oatfield Wind Farm
Our Client: Orsted Onshore Ireland Midco Limited

Dear Mr Murtagh,

We refer to the above matter, in particular your letter of 31 October 2025.

We note that, in your letter, you have stated that:

“The obligation on wind farm developers is to ensure that such structures do not impact on ANSP infrastructure. The threat posed by the proposed wind farm development to AirNav Ireland’s infrastructure has already been clearly stated in the data and analysis provided by AirNav Ireland.”

To confirm, our client has not been provided any technical assessment, quantitative analysis or data, as stated in your letter.

We request that you provide as a matter of priority, full and complete information relating to the data and analysis of AirNav Ireland in relation to Oatfield Wind Farm, as referenced above.

We await hearing from you as a matter of urgency.

Yours sincerely

Sent by email, no signature

MASON HAYES & CURRAN LLP

Dublin

London

New York

San Francisco

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na hÉireann
ag trádáil mar AirNav na
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Foirgneamh na hAmanna
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The Irish Air Navigation
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trading as AirNav Ireland
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T: +353 1 603 1505
www.airnav.ie



14 November 2025

FAO: Elaine Keating
Mason Hayes and Curran
Barrow Street
Dublin 4
By email only

Your ref: MHC-38960791-1
Your Client: Oatfield Wind Farm; Orsted Onshore Ireland Midco Limited

Dear Ms Keating,

I refer to the above, and your letter dated 7 November 2025.

The available data and analysis as requested in your letter dated 1 October 2025 has already been provided. The reasons that certain requested data has not been provided has also been explained. The renewed request is not understood.

The proposed Oakfield Wind Farm is located within the recommended safeguarding zone, as determined by the appropriate EU authority, that is required to protect radar signals. The details of the safeguarding zone have already been provided to your client.

Yours sincerely,

A handwritten signature in black ink that reads 'Ewan Murtagh'.

Ewan Murtagh
Company Secretary

Bord Stiúirthóirí / Board of Directors

Bryan Bourke (Chairman), Cian Blackwell,
Anne Bradley, Gerald Caffrey (Chief Executive),
Lourda Moloney, Emer Murray, James O'Loughlin,
Eimer O'Rourke, Aidan Skelly.

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BY EMAIL ONLY

18 November 2025 **Your ref:** **Our ref:** 45119.34
MHC-39039570-2

Matter: **Oatfield Wind Farm**
Our Client: **Orsted Onshore Ireland Midco Limited**

Dear Mr Murtagh,

We refer to the above matter and to your letter of 14 November 2025.

We wish to reiterate that despite the contention in your letters of 31 October and 14 November 2025 that the available data and analysis have previously been provided by AirNav, our Client has not been provided with any technical assessment, qualitative analysis or data. The only information provided to our Client is the *Schedule 1 AirNav Radar details 2025* provided on 3 November 2025.

As stated in our letter of 31 October 2025, our Client requires this data as a matter of urgency to undertake an analysis of the deflection issues and prepare and deliver a response to a further information request.

We request a response as a matter of utmost priority.

Your sincerely

Sent by email, no signature

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