



Defence
Infrastructure
Organisation

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Copy to Giulia Bazzoni - PEDW

28th May 2026

Dear Joe,

Marine and Coastal Access Act 2009 Part 4 Marine Licensing

LIŷr Floating Offshore Wind Project

I write in response to your email dated 14th May 2026, within which you provided a set of draft conditions to address the Ministry of Defence's (MOD) outstanding objections to the above development.

The MOD objected to this Marine Licence application, and also the Section 36 application, on the grounds that the proposed wind turbine generators would have an unacceptable impact upon the performance of the Hartland Point Primary Surveillance Radar (PSR). MOD also objected to the export cable routing through Danger Areas associated with Castlemartin Range. We previously advised that should these objections be overcome, and consent granted, that MOD would require conditions be applied to the Marine Licence and Section 36 consents relating to requirements for the turbines to be fitted with aviation warning lighting and information be submitted for charting purposes.

Following the submission of a feasible radar mitigation proposal and the applicant committing to accept liability should the export cable be damaged by Castlemartin Range firing activities, the MOD is prepared to remove its objections subject to conditions.

The MOD has considered the conditions drafted by Natural Resource Wales but the conditions as drafted do not afford MOD with the appropriate protection it requires and do not adequately address the MOD's concerns. Alternative condition wording are provided at annexes A, B and C, which the MOD feels address MOD's concerns and can secure the mitigation required.

Condition wording to secure a radar mitigation scheme to address the impacts on the Hartland Point PSR is provided at Annex A. To address the cable route objection, a Cable Mitigation Scheme and Communications Protocol condition is provided at Annex B. At Annex C, the MOD's standard aviation lighting and aviation safety conditions are provided.

The radar, aviation lighting and aviation safety conditions are standard MOD conditions which have been successfully applied to many onshore and offshore wind development consents.

We would be grateful if Natural Resource Wales can consider the MOD required conditions provided at annexes A, B and C and confirm if these conditions can be imposed upon the Marine Licence and Section 36 consents. Should Natural Resource Wales be minded to amend any of the conditions at annexes A, B and C, the MOD would welcome the opportunity to discuss these amendments with you first.

Unless and until agreement is reached on the wording of the conditions required to address MOD's concerns, the MOD's Hartland Point radar and Castlemartin Range cable route objections must remain in place. Once the conditions are agreed, the MOD should then be able to formally update its position to this application.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours Sincerely

L. van der Merwe

Laura van der Merwe

Senior Safeguarding Manager

Annex A

Air Traffic Control Radar

- 1) No wind turbine shall be erected unless and until an Air Traffic Control Radar Mitigation Scheme to address the impact of the wind turbines upon air safety has been submitted to and approved in writing by Natural Resource Wales in conjunction with the Ministry of Defence.

The Air Traffic Control Radar Mitigation Scheme (ATCRMS) is a scheme designed to mitigate the impact of the Llŷr Floating Offshore Wind Project upon the operation of the Primary Surveillance Radar at Hartland Point (“the Radar”) and the air traffic control operations of the Ministry of Defence which are reliant upon the Radar. The ATCRMS shall set out the appropriate measures to be implemented to mitigate the impact of the Llŷr Floating Offshore Wind Project on the Radar and shall be in place for the lifetime of the development.

The Llŷr Floating Offshore Wind Project shall be implemented strictly in accordance with the details set out in the approved ATCRMS.

- 2) No wind turbine erected as part of this development shall be permitted to rotate its rotor blades about its horizontal axis, other than for the purpose of testing radar mitigation for this development for specific periods as defined in the approved Air Traffic Control Radar Mitigation Scheme (ATCRMS) or otherwise arranged in accordance with provisions contained in the approved ATCRMS, until:
 - a) those mitigation measures required to be implemented prior to any wind turbine being permitted to rotate its rotor blades about its horizontal axis as set out in the approved ATCRMS have been implemented; and
 - b) any performance criteria specified in the approved ATCRMS and which the approved ATCRMS requires to have been satisfied prior to any wind turbine being permitted to rotate its rotor blades about its horizontal axis have been satisfied and Natural Resource Wales, in conjunction with the Ministry of Defence, have confirmed this in writing. Thereafter the development shall be operated strictly in accordance with the details set out in the approved ATCRMS for the lifetime of the Llŷr Floating Offshore Wind Project.
- 3) The undertaker must thereafter comply with all other obligations contained within the approved mitigation for the life of the authorised development, or unless the Ministry of Defence agree in writing that such mitigation is no longer required.

Reason: In the interests of aviation safety.

Annex B

Cable Mitigation Scheme & Communications Protocol

No development or preparatory works shall take place within Range Danger Areas D113A and D113B unless and until a Cable Mitigation Scheme, which includes a Communications Protocol, to mitigate the impacts of the Llŷr Floating Offshore Wind Project and its associated infrastructure on the Castlemartin Range and the operations of the Ministry of Defence conducted on the Castlemartin Range, has first been submitted in writing to and approved in writing by Natural Resource Wales (NRW) in consultation with the Ministry of Defence and the Ministry of Defence has provided written confirmation that the measures required by the Cable Mitigation Scheme and the Communications Protocol to be implemented prior to any development or preparatory works taking place have been implemented.

The Cable Mitigation Scheme and Communications Protocol must, as a minimum, include:

- outline procedures for communicating with the Castlemartin Range to obtain prior approval before undertaking any surveys, installation works or maintenance within Range Danger Areas D113A and D113B;
- a schedule setting out the projected dates and times for the implementation of the development works;
- a schedule identifying the methods to be used to install cable infrastructure within Range Danger Areas D113A and D113B;
- a schedule identifying the route and layout of all cables to be laid within Range Danger Areas D113A and D113B;
- procedures for approval of the cable installation methods and route and layout of all cables to be laid within Range Danger Areas D113A and D113B;
- the technical specifications and methods to be used for cable protection.

All development and preparatory works shall be carried out and all Licensed Activities shall be undertaken strictly in accordance with the provisions set out in the approved Cable Mitigation Scheme and Communications Protocol. No variation or departure from those provisions shall be permitted other than in accordance with procedures set out in the Cable Mitigation Scheme and Communications Protocol.

The Llŷr Floating Offshore Wind Project and its associated infrastructure shall be operated and maintained in accordance with the approved Cable Mitigation Scheme and the Communications Protocol for the lifetime of the Llŷr Floating Offshore Wind Project.

Reasons: to mitigate the impacts of the Llŷr Floating Offshore Wind Project upon the operation of the Castlemartin Range and Defence training and exercises undertaken on the Castlemartin Range; in the interests of safety.

Annex C

Aviation Lighting

Prior to commencing construction, installation, or deployment of any permanent, or temporal structure(s) with a height of 50 metres or greater (above mean sea level), the undertaker must submit an aviation lighting scheme for the approval of Natural Resource Wales in conjunction with both the Civil Aviation Authority and the Ministry of Defence. The aviation lighting scheme shall define how the development will be lit throughout its life to maintain civil and military aviation safety requirements as required under the Air Navigation Order 2016 and, or, determined necessary for aviation safety by the Ministry of Defence and, or, as directed by the Civil Aviation Authority.

The aviation lighting scheme shall include, but not be limited to:

- a) Details of any construction equipment and temporal structures with a height of 50m or greater (above mean sea level) that will be used during the construction, installation or deployment of the development, and details of any aviation warning lighting that they will be fitted with, specifying the position of the lights; the type(s) of lights that will be fitted; and the performance specification(s) of those lights;
- b) Details of any floating structures with a height of 50m or greater (above mean sea level) specifying the position of any lights; the type(s) of lights that will be fitted; and the performance specification(s) of those lights for all stages of marine transit or storage, or whilst moored prior to final installation;
- c) Details of any permanent structures with a height of 50m or greater (above mean sea level), providing their locations and heights, and identifying those that will be fitted with aviation warning lighting, specifying the position of the lights; the type(s) of lights that will be fitted; and the performance specification(s) of those lights.

The undertaker must exhibit such lights as detailed in the approved aviation lighting scheme. Where fitted to permanent structures, the approved lighting installed will remain operational for the lifetime of the development.

Aviation Charting and Safety Management

The undertaker must notify the Ministry of Defence, at least 14 days prior to the commencement of the works, in writing of the following information:

- a) the date of the commencement of the construction, installation, or deployment of any permanent structures with a height of 50m or greater (above mean sea level);
- b) the latitude and longitude, and maximum height of any construction equipment with a height of 50m or greater (above mean sea level) that will be used in the implementation of the approved development;
- c) the latitude and longitude, and maximum heights of any permanent structures with a height of 50m or greater (above mean sea level).

On completion of the development, the Ministry of Defence must be notified of any changes to the information supplied in accordance with these requirements.