

**DATE:** 18 March 2026 **CONFIDENTIALITY:** Public  
**SUBJECT:** TECHNICAL NOTE: CML2365 Conditions 3.27 & 3.29 Responses to regulatory queries to discharge conditions  
**PROJECT:** LB CCS Project **AUTHOR:** Various  
**CHECKED:** **APPROVED:**

## PURPOSE OF TECHNICAL NOTE

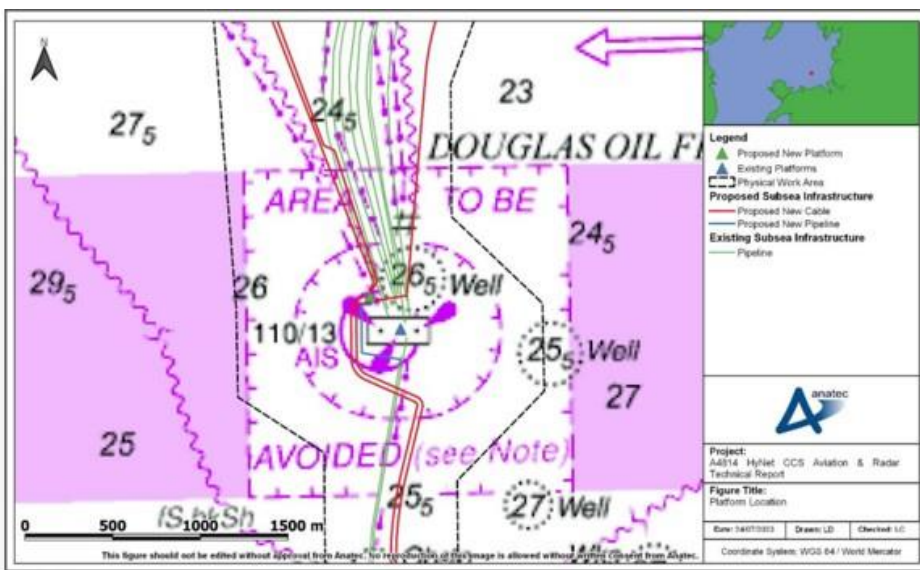
Comments on the LBCCS Combined VMP & NSP were provided by the MCA and Trinity House. Eleven main issues were raised, and the questions have been set out in ***bold black italicised text*** within this Technical Note. LBCCS has provided its responses in **blue text** immediately after each question. The Combined VMP & NSP has been updated accordingly.

1. ***The NSP does not describe how suitable navigable sea room will be maintained around the construction site for the new platform. While we understand that works will be undertaken within the existing safety zone (within the Area to be Avoided), the mooring spread for the heavy lift vessel (HLV) may extend anchor lines beyond the 500-metre safety zone.***

**LBCCS Response:** The installation of the Douglas CCS platform will be undertaken by the Heavy Lift Vessel SSCV **Balder**, operating in **Dynamic Positioning (DP) mode**. As the vessel will operate on DP during platform installation, **no anchor mooring spread will extend beyond the existing 500 m Safety Zone** surrounding the Douglas installation.

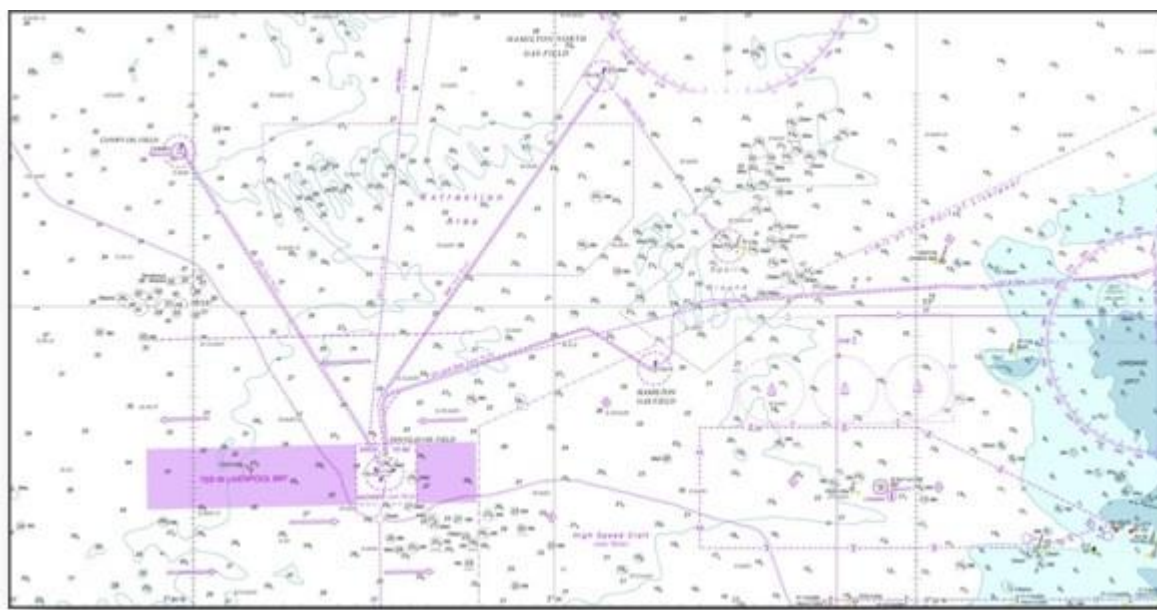
The Douglas CCS platform lies within the **Area to Be Avoided (ATBA)** established within the Liverpool Bay Traffic Separation Scheme (TSS). The ATBA is intended to provide safe operational access to the Douglas installation and restrict general vessel traffic from transiting in close proximity.

As installation activities will occur within this existing restricted area and the heavy lift vessel will operate on DP, navigable sea room for vessels transiting the Liverpool Bay TSS will not be restricted.





Satellite platform works within the wider Liverpool Bay field occur at separate locations remote from the Douglas installation. For these satellite installation activities, the SSCV *Balder* may operate using an anchor mooring spread due to shallow water depths limiting DP capability. However, these activities take place significantly distant from the Liverpool Bay TSS, and therefore the anchor spread associated with satellite installations will not affect navigable sea room within the TSS or in the vicinity of the Douglas platform.



The export cable route crosses the Welsh Channel between approximately KP 1.5 and KP 2.0, which provides navigational access to the Port of Mostyn. Cable installation in this area will be undertaken using a cable lay vessel supported by Anchor Handling Tugs (AHTs). The anchor patterns have been designed such that a navigable corridor through the Welsh Channel remains available for transiting vessels during operations.

Operations in this area will be undertaken in coordination with the Port of Mostyn Harbour Authority, in accordance with the agreed Memorandum of Understanding between Liverpool Bay CCS Ltd and the Port of Mostyn, which provides for coordination of cable laying activities with port vessel traffic and ensures safe vessel passage around the cable lay vessel where required.

During cable installation activities within the Welsh Channel, assisting Anchor Handling Tugs will act as guard vessels when not engaged in anchor handling operations to monitor vessel traffic and facilitate safe passage through the channel. Installation activities within this section will be temporary and of limited duration, after which the cable will be buried below seabed level and will not present any obstruction to navigation.

This area lies outside the Liverpool Bay Traffic Separation Scheme but is used by vessels transiting to and from the Port of Mostyn.

2. *Further reassurance required that construction and cable lay operations will not infringe on TSS shipping lanes.*

**LBCCS Response:** The Douglas CCS installation is located **between the eastbound and westbound traffic lanes of the Liverpool Bay Traffic Separation Scheme**, within the existing ATBA associated with the Douglas field.





The traffic lanes pass approximately **750 m from the Douglas installation**, ensuring separation between offshore installation activities and transiting commercial shipping.

Submarine cable installation between **Point of Ayr and Douglas CCS** will be undertaken using a **Cable Lay Vessel (CLV)** operating along the approved cable route.

Installation methodology includes:

- limited anchoring during nearshore installation up to approximately **KP11**.
- cable burial using a **plough system supported by a single bow anchor beyond KP11**.

This approach significantly limits the spatial footprint of installation activities. Cable laying vessels will operate in accordance with Rule 10 of the International Regulations for Preventing Collisions at Sea (COLREGs) governing conduct within Traffic Separation Schemes.

Guard vessels and AIS monitoring will be used to coordinate vessel movements where necessary and to ensure safe passage for transiting vessels.

Cable installation activities have been planned to avoid unnecessary encroachment into the TSS. The cable lay vessel will operate at controlled lay speeds and will be supported by AHT vessels. Installation operations are of limited duration, with marine coordination ensuring safe vessel passage where required. Notices to Mariners and navigational warnings will be issued prior to operations.

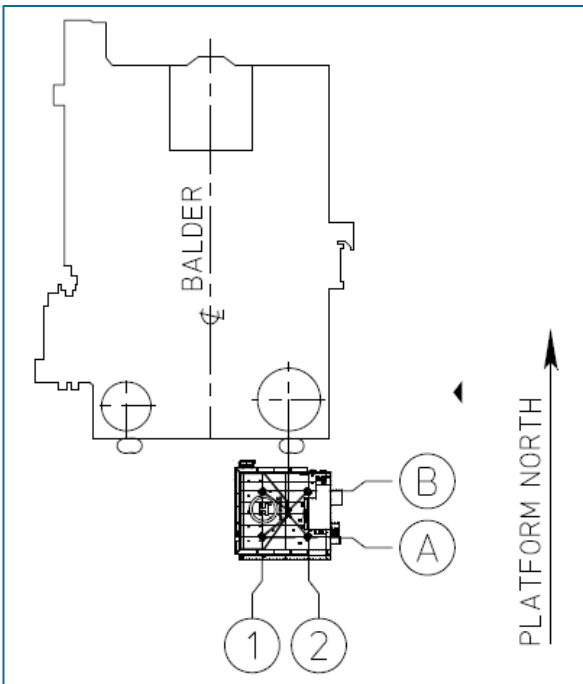
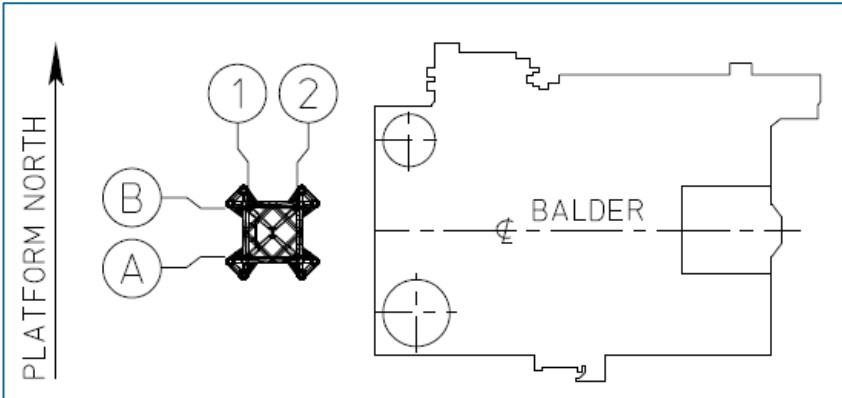
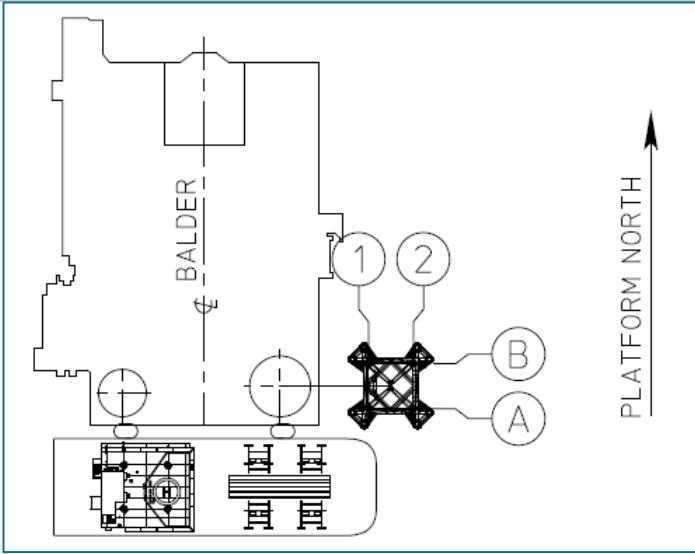
3. *Plans should reference the site-specific collision risk management plan including guard vessels, ERRVs and reduced visibility procedures.*

**LBCCS Response:** Vessel traffic will be managed through the project **Marine Coordinator**, supported by guard vessels when required during cable installation activities. Vessel movements and anchor positions will be monitored through the vessel navigation and Tug Management System. Standard offshore procedures regarding operational limits, including reduced visibility conditions, will apply.

4. *Further detail required regarding methodology for working within and adjacent to the Liverpool Bay Traffic Separation Scheme (TSS) given the elevated collision risk associated with high density traffic, cable lay operations and construction activities.*

**LBCCS Response:** Offshore installation activities have been designed to minimise interaction with the Liverpool Bay Traffic Separation Scheme. The Douglas CCS platform is located within the Area to Be Avoided (ATBA) established within the TSS, where general vessel traffic is already restricted. Platform installation will be undertaken by SSCV Balder operating in Dynamic Positioning (DP) mode, ensuring no anchor mooring spread extends beyond the existing 500 m safety zone. Cable installation activities will be coordinated by the Marine Coordinator with guard vessels monitoring vessel traffic where required.







5. *Clarification required regarding the timeline between construction of the new Douglas platform and removal of the existing Douglas installation.*

**LBCCS Response:** A temporary period will occur during which both the existing Douglas installation and the new Douglas CCS platform will be present within the Douglas field area. The existing installation is currently non-operational and subject to a separate decommissioning programme managed under OPRED regulatory approval. As both structures remain within the ATBA and existing safety zone, this temporary overlap does not introduce additional navigational restrictions. It is expected in next 5 years that existing Douglas Complex is removed.

6. *Clarify safety zone arrangements for the existing and new Douglas installations and whether additional safety zones will be established.*

**LBCCS Response:** The Douglas CCS platform will be installed within the existing Douglas field ATBA and safety zone arrangements. Safety zone provisions therefore remain consistent with the current navigational restrictions associated with the Douglas installation. During construction activities navigational warnings and guard vessels will provide additional operational control where required. Once Douglas CCS is commissioned, a new 500m safety zone shall be established around platform.

7. *No consideration of the period during which both the existing Douglas installation and the new CCS platform will be present simultaneously.*

**LBCCS Response:** During installation there will be a temporary period during which both installations coexist within the Douglas field area. The existing installation will subsequently be removed as part of the approved decommissioning programme managed under a separate regulatory process.

8. *Marine Coordinator role welcomed but liaison with wind farm operators should be described.*

**LBCCS Response:** The Marine Coordinator will oversee vessel traffic monitoring, communications and coordination of project vessels during offshore operations. Liaison will be maintained with relevant offshore stakeholders including nearby wind farm operators where appropriate to ensure safe coordination of activities including Crossing Agreements compliance.

9. *Inconsistent dates within the Vessel Management Plan: Table 1.1 indicates pipeline spool installation April–May 2027 or September–October 2027, while Section 4.4 describes January–July 2027.*

**LBCCS Response:** The programme information within the Vessel Management Plan has been updated to ensure consistency across all sections of the document. Table 1.1 and the detailed activity tables have been aligned to reflect the same indicative installation schedule. To be updated accordingly as per schedules.

Phase	Activity	Approx. Timing
Mobilisation	CSV / DSV vessels mobilise from Peterhead	Early 2027
Early spool works	First metrology / tie-ins (PL1039 / PL1030)	Jan 2027 (planning envelope)
Main spool installation campaign	Spool delivery and tie-ins (PL1035 / 1036A)	Late Mar – Apr 2027
Additional spool installation	PL1041 and remaining tie-ins	May – Jun 2027
Final metrology / completion	Douglas spool completion works	Late Jun – early Jul 2027





10. *Table 4-21 proposes spool installation beginning January 2027 which conflicts with Marine Licence Condition 3.18.1 prohibiting works between 01 November and 31 March without approval.*

**LBCCS Response:** The indicative schedule presented in the VMP reflects a planning envelope only. Offshore construction activities will be undertaken in accordance with the conditions of Marine Licence CML2365. Pipeline spool installation activities will therefore be scheduled outside the restricted seasonal period unless prior written approval is obtained from the Licensing Authority in accordance with Condition 3.18.1.

11. *Table 1.1 indicates installation of the Douglas CCS platform in September/October 2026, while Section 4.5 refers to Hamilton Main and Hamilton North topsides installation in March–April 2027. Clarify scope of Activity 4.*

**LBCCS Response:** Activity 4 in the Vessel Management Plan refers specifically to the **installation of the Douglas CCS platform**. Installation of Hamilton Main and Hamilton North topsides is part of the wider project programme and is described separately for information. The schedule descriptions in the VMP have been clarified to distinguish these activities.



