DATE:	23 March 2026	CONFIDENTIALITY:	Public
SUBJECT:	TECHNICAL NOTE: CML2365 Condition 3.30 Responses to regulatory queries to discharge conditions		
PROJECT:	LB CCS Project	AUTHOR:	Various
CHECKED:		APPROVED:	

PURPOSE OF TECHNICAL NOTE

Comments on the LBCCS LMP were provide by Trinity House, and the MCA. Twelve 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 LMP has been updated accordingly.

TRINITY HOUSE

1. *Please note that this is a live document that is subject to change throughout the project.*

LBCCS Response: Noted. The LMP has been updated to state clearly that it is a 'live' document and will be revised as the project design, construction methodology, and agreed AtoN arrangements developed. Any material change to approved lighting and marking arrangements will be submitted for approval in accordance with Marine Licence CML2365 Condition 3.30.2. Please also see response to Question 2.

2. *We would not expect the LMP to include any operational details, as it currently does in places.*

LBCCS Response: We understand the Trinity House comment. However, Marine Licence CML2365 Condition 3.30 requires the submission and approval of a Lighting and Marking Plan (LMP) prior to the commencement of all the licensed activities. As such, Condition 3.30 is a pre-commencement condition, intended to ensure that appropriate navigational and aviation safety measures are defined and agreed in advance of any offshore works taking place.

Given the nature of the Project, which is being delivered in discrete but overlapping phases, the LMP has been developed to apply across all phases of the Project lifecycle, including construction, installation, operation, and transitional periods where different phases overlap. This approach ensures that suitable lighting and marking arrangements are always in place, regardless of whether individual project elements are under construction or already operational.

The Project will not be delivered as a single, continuous installation campaign. Instead, it will comprise a sequence of activities undertaken over multiple years. For example, the Douglas CCS platform is scheduled to be installed during summer/autumn 2026 and will become operational from that point onwards. Subsequent activities, including the installation of pipeline spools and electrical and fibre-optic cables to the satellite platforms, are planned to be undertaken during spring/summer 2027.

As a result, there will be periods during which:

- elements of the Project are fully installed and operational, requiring permanent operational lighting and marking; and
- other elements are simultaneously under construction or installation, requiring temporary or construction-phase lighting and marking arrangements associated with vessels, equipment, and partially installed infrastructure.

The LMP therefore addresses:

- construction-phase lighting and marking associated with installation vessels, jack-up platforms, and temporary works;
- operational lighting and marking for permanently installed infrastructure, including the Douglas CCS platform, once commissioned; and
- interface and transitional arrangements to ensure continuous navigational safety during periods when construction and operational activities overlap.

By adopting this holistic, phased approach, the LMP ensures continuous compliance with Condition 3.30 throughout the duration of the Project, avoids gaps in navigational safety coverage, and provides a clear framework for managing lighting and marking requirements as the Project progresses from installation through to long-term operation. This approach is consistent with the intent of Condition 3.30 as a pre-commencement requirement and reflects the practical delivery of a phased offshore development.

Notwithstanding, the LMP has where appropriate been revised to focus on the functional lighting and marking requirements relevant to navigational safety, including the type, range, character, purpose, and management of the AtoN.

3. *The document should clearly state the details of all aids to navigation established throughout all stages of the project.*

LBCCS Response: Agreed. The LMP has been updated to provide a clearer summary of the AtoN arrangements applicable throughout all project stages, including construction, any transitional phases, operation, and where relevant temporary hazard marking. This includes both temporary and permanent arrangements.

4. *References to IALA document O-139 should be amended to reference IALA guideline G1162.*

LBCCS Response: Agreed. The LMP has been revised to reference IALA Guideline G1162 as the primary applicable guidance for the marking of offshore man-made structures. All remaining references to O-139 have been removed and the LMP updated accordingly. Please see attached declaration of conformity from our supplier.

5. *Any plans for the use of racon should be detailed within the document.*

LBCCS Response: Agreed. The LMP has been updated to provide a description of Radar Beacons (RACONs) as fixed Aids to Navigation (AtoN) in accordance with IALA guidance and the requirements of the UK General Lighthouse Authority (Trinity House). RACONs will be installed on the Douglas CCS platform and the satellite platforms (Hamilton, Hamilton North and Lennox) to enhance radar conspicuity and navigational safety. Each RACON will operate as a passive radar responder, automatically replying to interrogating vessel radar transmissions with a Morse-coded identifier on both X-band and S-band frequencies, enabling mariners to readily identify the installation and determine its bearing and range on radar displays. The RACONs will be mounted at elevated locations to provide unobstructed 360-degree azimuth visibility, designed for continuous offshore operation, and charted as recognised AtoN on UKHO nautical charts. The Douglas RACON will be integrated with the platform radar system to prevent self-interrogation, while the satellite platform RACONs will operate autonomously, with hazardous-area installations provided in ATEX-certified configurations where required.

6. *Under section 2.1.3 'Temporary AtoN', the use of the term 'must' should be clarified to note that any temporary AtoN are to be established only after consultation with Trinity House.*

LBCCS Response: Agreed. The wording has been amended to clarify that temporary AtoN will only be established following consultation with, and where required, approved by, Trinity House.

Additionally, LBCCS can confirm the AtoN system has been designed to align with IALA Category 3, corresponding to an availability of approximately 97%. This is consistent with the limitations expected for NUI-type platforms and matches the feedback received from Trinity House.

7. *Under section 4.2.8 it should note that Trinity House is to be consulted regarding the need for any temporary AtoN.*

LBCCS Response: Agreed. Section 4.2.8 has been updated to state that where exposure, free span, or any other seabed condition results in a potential navigational hazard, the need for temporary AtoN will be assessed in consultation with Trinity House, and appropriate temporary marking will be implemented where required until the hazard is removed or mitigated.

8. *A casualty response plan should be detailed within the LMP, we recommend including this under section 6.2. This should reference the requirement to report any casualties to Trinity House via the Local AtoN Reporting System (LARS). Details of your LARS account will be provided to you once it is confirmed that the AtoN have been established. Attached is a guide which may help you in producing the casualty response plan.*

LBCCS Response: Agreed. A casualty response procedure has been added to the LMP, under Section 6.2, to address AtoN failures, defects, outages, displacement, or damage. This includes immediate risk assessment, interim mitigation measures where required, notification to Trinity House via LARS where applicable, and notification to MCA, NRW, and UKHO as appropriate. The procedure also covers the issue of navigation warnings and Notices to Mariners where necessary.

MCA

9. *We note in Table 2-1 that there are some erroneous Marine Guidance Note reference numbers and titles which need to be checked and corrected.*

LBCCS Response: Agreed. All Marine Guidance Note references and titles within Table 2-1 and the wider document have been reviewed and corrected.

10. *We note in Table 3-1 under the activity "Incident, defect, and outage management" the list of actions should include reporting the failure to the UK Hydrographic Office for the purpose of distributing Navigation Warnings, in the immediate future while the failure is reported and rectified.*

LBCCS Response: Agreed. The relevant section of the LMP has been updated to include notification to the UK Hydrographic Office where an AtoN failure, outage, or navigational hazard is considered significant enough to require promulgation of a Navigation Warning while rectification is being undertaken.

11. *There appears to be no consideration of the period during which both the new platform and the existing Douglas installation will be simultaneously in place. The MCA is therefore unclear how the lighting and marking arrangements at both the new and existing platforms at Douglas within the area to avoid will be managed. This requires clarification.*

LBCCS Response: Agreed. The LMP has been updated to address the transitional phase during which both the existing Douglas Complex and the new Douglas CCS Platform will be present simultaneously. The existing Douglas Complex will remain in its current operational state (although not in production), and its approved and existing lighting and marking arrangements will remain unchanged throughout the installation of the new Douglas CCS Platform. These arrangements will not be modified and will not be impacted by the new installation.

During installation of the Douglas CCS Platform, lighting and marking will be provided in accordance with installation vessel requirements and applicable COLREGS and project-specific construction AtoN arrangements. Following installation, a temporary platform lighting arrangement will be established. This will include, as a minimum:

- fog signal (fog horn);
- emergency lighting;
- perimeter navigation lights; and
- illuminated identification panels.

Where required, temporary lighting will be supplemented by installation support vessels (e.g. jack-up unit) until permanent platform systems are commissioned.

Upon completion of first commissioning activities, the permanent approved AtoN system for the Douglas CCS Platform will be activated and will assume full operational function.

Throughout the transitional phase:

- both structures will be independently marked and lit;
- lighting characteristics will be configured such that the two platforms can be clearly distinguished by mariners; and
- final arrangements will be agreed with Trinity House as part of the AtoN approval process.

The Douglas CCS Platform is located within the existing 500 m safety zone associated with the Douglas Complex. Marine traffic in the area will continue to be managed in accordance with established safety zone controls and standard marine procedures. Full decommissioning, which considers removal of the existing Douglas Complex, is not currently planned within the near-term project timeframe and it is independent from installation of New Douglas CCS platform.

When decommissioning and full removal occurs in the future, the Douglas CCS Platform will retain its approved lighting and marking arrangements and will assume standalone status with respect to navigational marking and associated safety zones.

12. *The MCA would expect all feedback provided by Trinity House to be suitably addressed before this condition can be considered discharged.*

LBCCS Response: Noted. The LMP has been revised to address all comments raised by Trinity House in full, and the updated document has been resubmitted for review accordingly.

IALA G1162 CONFORMITY DECLARATION

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IALA

IECEx NOTIFIED

ATEX NOTIFIED

CERTIFIED MANAGEMENT SYSTEM
ISO 9001 - ISO 14001
ISO 45001

Pesaro, 23/03/2026
SHEET 1 OF 1

IALA G1162 CONFORMITY DECLARATION

PLANT : **NAVIGATION AIDS FOR LIVERPOOL BAY PROJECT (DOUGLAS- HAMILTON-HAMILTON N)**

CUSTOMER : **ROSETTI MARINO S.P.A.**

CONTRACT : **1725002111 REV. A DATED 30/01/2026**

JOB CODE : **JB-2534/A**

WE DECLARE UNDER OUR SOLE RESPONSABILITY THAT ALL EQUIPMENT LISTED IN YOUR PURCHASE ORDER TO WHICH THIS DECLARATION (REFERRED TO THE NAVIGATION AIDS SYSTEM FOR DOUGLAS PLATFORM, HAMILTON PLATFORM AND HAMILTON NORTH PLATFORM), ARE IN CONFORMITY WITH IALA GUIDELINE G1162.

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