

## Gherbi Lamia

---

**From:** Gherbi Lamia  
**Sent:** 24 May 2026 13:49  
**To:** Gherbi Lamia  
**Subject:** RE: CML2365 Discharge of Conditions 3.27 & 3.29 - Revised Combined VMP/NSP Response

---

**From:** navigation safety <[navigationsafety@mcga.gov.uk](mailto:navigationsafety@mcga.gov.uk)>  
**Sent:** 16 April 2026 09:13  
**To:** Treby, Stephen <[stephen.treby@cyfoethnaturiolcymru.gov.uk](mailto:stephen.treby@cyfoethnaturiolcymru.gov.uk)>  
**Subject:** RE: CML2365 Discharge of Conditions 3.27 & 3.29 - Revised Combined VMP/NSP Response

**Rhybudd:** Deilliodd yr e-bost hwn o'r tu allan i'r sefydliad. Peidiwch â chlicio dolenni, atodiadau agored nac sganio codau QR oni bai eich bod yn cydnabod yr anfonwr ac yn gwybod bod y cynnwys yn ddiogel.

**Caution:** This email originated from outside of the organisation. Do not click links, open attachments or scan QR Codes unless you recognise the sender and know the content is safe.

Dear Stephen,

Thank you for the opportunity to comment further on the Discharge of Conditions 3.27 Vessel Management Plan (VMP) and 3.29 Navigation and Safety Plan (NSP) for Marine Licence CML 2365 for the Hynet Carbon Dioxide Transportation and Storage project in Liverpool Bay, and the updated VMP and NSP received on 9<sup>th</sup> April 2026.

The applicant's feedback in the technical note was useful to aid our understanding on the risks and implications for shipping and safe navigation. The MCA is satisfied that the majority of our comments have now been addressed. There is however one item which requires updating in the plans as per section 2. Interaction with Shipping Lanes and Cable Lay Operations. We have referred to each point in our original response below:

### General Observations

We now understand that the existing Douglas Platform is currently non-operational, decommissioning has been approved by OPRED, and that the Douglas CCS installation will be sited alongside the existing Douglas Platform, where both installations will co-exist within the existing 500m Safety Zone for up to 5 years until the existing Douglas Platform is fully decommissioned.

### Specific MCA Comments

#### 1. Navigable Sea Room and Mooring Arrangements

We note that 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 in DP during platform installation, no anchor mooring spread will extend beyond the existing 500m Safety Zone. Beyond the 500m Safety Zone the platforms sit in the Area To Be Avoided which restricts vessels from transiting close to the platforms. The MCA is content with this response.

[Applicant Response: Thank you](#)

#### 2. Interaction with Shipping Lanes and Cable Lay Operations

We note that 3.6.4 states the cable lay vessel will operate under Restricted Ability to Manoeuvre (RAM) and within 500m Safety Zone for cable pull in and section 4.6.10 states that while cable laying in the access to Port of Mostyn, Anchor Handling Tugs will be used to enable a navigable corridor through the Welsh Channel for transiting vessels. In addition, section 4.3.30 states vessel movements during cable lay and burial operations will be at very slow speed at 200m to 400m per hour. However, MCA's previous comments below do not appear to have been fully addressed in the documents with additional analysis to support the confirmation stated in section 5.4.4:

- Site and time specific analysis of vessel traffic volumes at the point of cable lay crossing the shipping lane i.e how many vessels the cable laying will encounter and the speed through the lanes which the vessel can lay to ensure proper burial ; -specific analysis of vessel traffic volumes at the point of cable-lay crossing
- Detail on how interactions will be minimised (e.g. timing works for periods of lower traffic density).

**Applicant Response:** Please see Appendix F

### 3. Collision Risk Management Plan

The Collision Risk Management Plan is to be managed by the Marine Co-ordinator. The MCA is satisfied that the roles and responsibilities of the Guard Vessels and the communications procedures are clearly set out however the practical arrangements for the ERRV and/ or GV are yet to be confirmed.

#### **Applicant Response**

The Applicant confirms in section 6.2, that Guard vessels will be deployed during offshore construction activities, as required by the Navigational Risk Assessment and project-specific risk assessments, to monitor vessel traffic, enforce exclusion zones, and communicate with third-party vessels.

Where required, an ERRV will be provided in accordance with MCA guidance and relevant offshore standards; and the final ERRV and/or GV arrangements will be defined and agreed prior to commencement of offshore works, including confirmation of vessel numbers, locations, and operational responsibilities. These arrangements will be implemented under the control of the Marine Coordinator, with full alignment with Marine Licence requirements, MCA guidance, and industry best practice.

### 4. Construction Safety Zones

It is now clear that both the new CSS and existing Douglas Platform will co-exist within the existing safety zone and that cable installation activities will be co-ordinated by the Marine Coordinator with guard vessels monitoring vessel traffic where required. The MCA is therefore content with this response.

**Applicant Response:** Thank you

### 5. Overlap of New and Existing Platforms

Section 4.6.7 states: *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.* This identifies the expected longest duration the two installations will co-exist, being 5 years. The MCA is therefore content with this response on the understanding that the lighting and marking arrangements are agreed with Trinity House.

**Applicant Response:** Thank you

The MCA would expect the licence holder to address the outstanding points outlined above before the VTMP and NSP can be approved. Subject to these matters being satisfactorily resolved, and on the basis that the licence holder adheres to all relevant maritime legislation, the original licence conditions and MCA advisories, and the mitigation measures set out in the VMP and NSP, the MCA would have no further concerns regarding the proposals.

If you have any questions regarding this response, please contact us.

Kind regards

**Jo Cooke**

Marine Licensing and Consenting  
Advisor

**Marine Safety and PNT Services** [NavigationSafety@mcga.gov.uk](mailto:NavigationSafety@mcga.gov.uk)



Maritime &  
Coastguard  
Agency

Mobile: 07815 703225

**Maritime & Coastguard Agency**

Spring Place, 105 Commercial Road,  
Southampton, SO15 1EG



**Safer Lives, Safer Ships, Cleaner Seas**

[www.gov.uk/mca](http://www.gov.uk/mca)

---

**From:** Treby, Stephen <[stephen.treby@cyfoethnaturiolcymru.gov.uk](mailto:stephen.treby@cyfoethnaturiolcymru.gov.uk)>

**Sent:** 24 March 2026 10:29

**Subject:** CML2365 Discharge of Conditions 3.27 & 3.29 - Revised Combined VMP/NSP - DEADLINE 14 APRIL 2026

Dear Consultee,

## **HYNET CARBON DIOXIDE TRANSPORTATION AND STORAGE PROJECT – LIVERPOOL BAY**

The Marine Licencing Team has received an application containing updated documents from Liverpool Bay CCS Ltd for the purpose of discharging conditions 3.27 & 3.29 of Marine Licence **CML2365**, in relation to the above project. Conditions 3.27 & 3.29 require:

### **3.27 Vessel Management Plan (VMP)**

*3.27.1 The Licence Holder must submit a VMP to the Licensing Authority for written approval at least 4 months prior to commencement of the Licensed Activities. No Licensed Activities may be undertaken prior to written approval from the Licensing Authority.*

*3.27.2 The Licence Holder must ensure that any actions outlined in the documents detailed in*

*condition 3.27.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.*

### 3.29 Navigation and Safety Plan (NSP)

*3.29.1 The Licence Holder must submit a NSP to the Licensing Authority for written approval at least 4 months prior to commencement of the Licensed Activities. No Licensed Activities may be undertaken prior to written approval from the Licensing Authority.*

*3.29.2 The Licence Holder must ensure that any actions outlined in the documents detailed in condition 3.29.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.*

I have attached the application form, an updated combined VMP & NSP and a Technical Note that brings together the questions raised by consultees. Please note that in the updated Combined VMP & NSP, new and updated sections are shown as **BLUE TEXT**.

Please submit a response by the **14 April 2026**. If I do not hear from you by this date then I shall assume you have no comments to make. If you have any questions, please don't hesitate to ask.

Kind regards,  
Stephen

**Stephen Treby**

Uwch Swyddog Trwyddedu Morol / Senior Marine Licensing Officer

Cyfarwyddiaeth Strategaeth, Polisi a Thystiolaeth / Strategy, Policy and Evidence Directorate

0300 065 4068



**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.**

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



**From:** Treby, Stephen

**Sent:** 21 January 2026 15:46

**Subject:** CML2365 Discharge of Conditions 3.27 & 3.29 - Combined VMP/NSP - DEADLINE 12 FEBRUARY 2026

Dear Consultee,

## **HYNET CARBON DIOXIDE TRANSPORTATION AND STORAGE PROJECT – LIVERPOOL BAY**

The Marine Licencing Team has received an application from Liverpool Bay CCS Ltd for the purpose of discharging conditions 3.27 & 3.29 of Marine Licence **CML2365**, in relation to the above project. Conditions 3.27 & 3.29 require:

### **3.27 Vessel Management Plan (VMP)**

*3.27.1 The Licence Holder must submit a VMP to the Licensing Authority for written approval at least 4 months prior to commencement of the Licensed Activities. No Licensed Activities may be undertaken prior to written approval from the Licensing Authority.*

*3.27.2 The Licence Holder must ensure that any actions outlined in the documents detailed in condition 3.27.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.*

### **3.29 Navigation and Safety Plan (NSP)**

*3.29.1 The Licence Holder must submit a NSP to the Licensing Authority for written approval at least 4 months prior to commencement of the Licensed Activities. No Licensed Activities may be undertaken prior to written approval from the Licensing Authority.*

*3.29.2 The Licence Holder must ensure that any actions outlined in the documents detailed in*

*condition 3.29.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.*

I have attached the application, combined VMP/NSP and the Marine Licence for your convenience. Please submit a response by the **11 February 2026**. If I do not hear from you by this date then I shall assume you have no comments to make. If you have any questions, please don't hesitate to ask.

Kind regards,  
Stephen

**Stephen Treby**

[Uwch Swyddog Trwyddedu Morol](#) / Senior Marine Licensing Officer

[Cyfarwyddiaeth Tystiolaeth, Polisi a Thrwyddedu](#) | Evidence, Policy and Permitting Directorate  
0300 065 4068



**Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi.**

Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.



**Cyfoeth  
Naturiol**  
Cymru  
**Natural  
Resources**  
Wales

**Byd natur a phobl  
yn ffynnu gyda'n gilydd**  
Nature and people  
thriving together



[cyfoethnaturiol.cymru](http://cyfoethnaturiol.cymru)  
[naturalresources.wales](http://naturalresources.wales)

The information in this email may be confidential or otherwise protected by law. If you received it in error, please let us know by return e-mail and then delete it immediately, without printing or passing it on to anybody else.

Incoming and outgoing e-mail messages are routinely monitored for compliance with our policy on the use of electronic communications and for other lawful purposes.