



TRINITY HOUSE

The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol
BS1 6PN

Your Ref: EN010121
Identification No. 20049503

21 January 2025

Dear Sir / Madam,

**The Morecambe Offshore Wind Farm Generation Assets
Written Representation to the Examining Authority on the Applicant's Further Update to
the draft DCO and Deemed Marine Licence for Deadline 3**

We refer to the above application for Development Consent.

Trinity House requests to make a written representation to the Examining Authority (ExA) in respect of the Applicant's Further Update to the draft DCO and Deemed Marine Licence (Rev 03 -12.12.2024).

In particular, Trinity House would refer to Schedule 6, Part 2, Paragraph 6 (Colouring of structures) and notes that sub-paragraph (1) has been amended as follows:

6.—(1) Except as otherwise required by Trinity House, the undertaker must paint all structures forming part of the authorised project yellow (colour code RAL 1023) from at least HAT to a **minimum of 15m above HAT or such other** height as directed by Trinity House.

The principal change in this regard being the inclusion of the additional text in this Condition (as highlighted in red above) '**minimum of 15m above HAT or such other**'

Trinity House understands that the Applicant has made this amendment consequent to a request made by the ExA at ISH 1.

As such, Trinity House respectfully requests to highlight that, in its view, this wording is too prescriptive and may imply that 15m is the absolute minimum height in relation to the painting of structures in all cases.

However, this is not, in practice, the case and simply reflects a guideline* for the recommended minimum height in relation to the painting of structures rather than what Trinity House considers should be stated as the typical presumption under the DML.

**IALA Guideline G1162: The Marking of Offshore Man-Made Structures.*

Trinity House would therefore suggest that the standard wording should apply to above referenced Condition, omitting the words “*minimum of 15m above HAT or such other*”, this being consistent with several other made Orders of this nature.

We trust that this response is helpful and would ask that all correspondence regarding this matter is addressed to myself at russell.dunham@trinityhouse.co.uk and to Mr Steve Vanstone at navigation@trinityhouse.co.uk

Yours faithfully,

A handwritten signature in black ink, appearing to read 'R Dunham', written over a horizontal line.

Russell Dunham ACII

Legal Advisor

Email: Russell.dunham@trinityhouse.co.uk