



Maritime &
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Agency

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18th March 2025

Your ref: EN010125

Interested Party reference number: 20049792

Dear Sir/Madam

Application by RWE Renewables UK Dogger Bank South (West) Ltd and RWE Renewables UK Dogger Bank South (East) Ltd for an Order Granting Development Consent for the Dogger Bank South Offshore Wind Farms

Examination Timetable – Deadline 3 – The Examining Authority’s (ExA’s) written questions and requests for information, ExQ1.

Thank you for inviting the Maritime and Coastguard Agency (MCA) to provide additional information to the Examining Authority. We would like to submit the following response to the written questions (ExQ1) at Deadline 3:

Q1. ARMC.1.1: Colour of offshore structures

‘The colour requirement for the proposed offshore structures differs between International Civil Aviation Organisation and Trinity House [APP-125, paragraphs 35 and 36]. Condition 11 of Deemed Marine Licence (DML) 1 [REP1-004] states, ‘the undertaker must paint all structures forming part of the authorised scheme yellow (colour code RAL 1023) from at least HAT to a height as directed by Trinity House. Unless the MMO otherwise directs, the undertaker must paint the remainder of the structures grey (colour code RAL 7035)’.

‘Could you comment on the appropriateness of the colour secured in the DML condition, whether the colour requirement inconsistencies are resolvable, and provide appropriate justification?’

MCA Response

The MCA is content with the appropriateness of the condition. As explained in paragraph 36 of APP-125: ‘UK regulations adopt ICAO Annex 14’s requirements for the lighting of wind turbines but do not require that wind turbines follow the ICAO recommendation for paint colour’. Therefore, the Trinity House requirements as stated in the condition should be followed.

Q2. ARMC.1.8: Search and Rescue aircraft

‘ES Appendix 15-3 [APP-129, paragraph 49] states, ‘In summary, although a reduction in helicopter access under CAT Regulations would impose a logistic restriction on a gas installation, it would not result in a reduced level of safety, as SAR helicopters would still be able to access an installation’.’

‘Can you comment whether, should emergency and icing conditions coincide, an additional reliance on Coastguard Search and Rescue aircraft would be acceptable? If not, why not?’

MCA Response

MCA notes that the helicopter access report has been updated since revision 1 (APP-129) following MCA feedback, although this was post DCO application. The MCA had several comments and concerns regarding some of the content and most of these were addressed. One of the points raised related to the conclusion that a reduction in helicopter access under CAT regulations would only impose a logistic restriction. There are potential scenarios such as non-emergency evacuations (e.g. power failures, forecast bad weather) where a time-critical response may still be required and therefore it could be considered as more of a safety issue rather than a logistical one.

However, in the case of Dogger Bank South, this is not as much of a concern given there are no platforms in close proximity. If there is an emergency, it is likely that SAR would be fully engaged in a response which may or may not include CAT helicopters. Should there also be icing conditions, this may well impact the effectiveness or availability of CAT helicopters to respond but it would not be expected that this would result in an over reliance on HM Coastguard SAR helicopters.

Q3 SN 1.7: Compass deviation studies

‘How would the need for pre- and post-construction compass deviation studies be identified, as referred to by the MCA [RR-031] and the subsequent Applicants’ response [PDA-013]?’

‘Could the Applicants explain how this is secured in the draft DCO?’

MCA Response**Pre-construction (desk-based) compass deviation study**

A pre-construction desk-based compass deviation study based on the actual laying method is suggested considering the following factors:

- Whether the cable is HVDC.
- The depth of water and the seabed conditions. (To ascertain the depth below compass)
- The direction of the cable (parallel or perpendicular to the direction of traffic)
- Type and density of the traffic within the nearshore area where depth below compass will be less.
- If there is chance of separate trenches of cables towards landfall.

Post-construction (actual) compass deviation study

If the pre-construction study concludes that the MCA requirement of a 3-degree deviation for 95% of the cable route and the 5-degree deviation for the remaining 5% cannot be met, then MCA would request an actual on-site compass deviation report which will be provided to UKHO and in turn will be updated on nautical charts as required.

As explained in our Relevant Representation, we note that the Table 13-1 of the NRA (APP-124) the applicant has explained the mitigation measures to address the potential impacts on ships' compasses. If any of the parameters (burial depths, separation distances of cables, percentage of cable being buried, percentage of the cable below 20m water depth) within the table are to change we would expect the applicant to consult with MCA. We would then require a desk-based report confirming that the HVDC cable with the revised parameters can still comply with the MCA condition of a 3-degree deviation for 95% of the cable route and the 5-degree deviation for the remaining 5%. If the report suggests that this condition cannot be met, a post-construction actual compass deviation report would be required.

Q4: SN 1.14: Search and Rescue response times

'Can you confirm if there would be a likely effect on search and rescue response times due to the proposed arrays obstructing the most effective path to an incident and would this be acceptable?'

'Has it been evidenced how this has been minimised?'

MCA Response

Any array which is constructed at sea has the potential to impact on search and rescue response times, and effectiveness. An incident location, its vicinity and route to it would all be assessed at the time by HM Coastguard and a suitable response mobilised. The layout of the array is determined in a way which maximises the options for allowing search and rescue to continue within the array and where resources are required to transit past an array. This would either be achieved by going through, over or around.

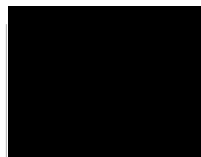
This is dynamically assessed and will differ depending on the site and environmental conditions at the time. While there may on occasions be some undesirable impact on response times, there are also benefits by having resources (predominantly vessels) from the developer who are frequently able to respond to nearby incidents. If HM Coastguard assess the area around or nearby the array to be at a higher risk of a requirement for SAR, there may be additional requirements requested of the developer, but this has not been required for this application.

The offshore array layout plan will be agreed with MCA during the post consent stage. This will ensure any likely negative effects on SAR operations are kept to a minimum. In addition, a SAR checklist will be required during post consent stage to record discussions, requirements and recommendations outlined in MCA SAR guidance. The content of the SAR checklist will be applicable over the life of the windfarm.

Yours Faithfully,



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Peter Lawson
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