

## CAA Strategy and Policy

19 March 2025

### Application by RWE Renewables UK Dogger Bank South (West) Limited and RWE Renewables UK Dogger Bank South (East) Limited for the Dogger Bank South Offshore Wind Farms Project

Dear Sir or Madam,

On 28 February 2025, the Examining Authority (ExA) published written questions and requests for information (ExQ1). For those questions which were directed at the Civil Aviation Authority, along with other interested parties, the table below provides the answers from the Civil Aviation Authority.

ARMC.1.1	Civil Aviation Authority (CAA), Maritime Coastguard Agency (MCA) and Trinity House	<p><b>Colour of offshore structures</b></p> <p>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)'.</p> <p><b>CAA answer</b></p> <p>The International Civil Aviation Organisation (ICAO) publishes colour requirements for wind turbines in its Annex 14, Volume 1 – Aerodromes, to the Chicago Convention Chapter 6.2.4.2 as a recommendation that the rotor blades, nacelle and upper 2/3 of the supporting mast of wind turbines should be painted white, unless otherwise indicated by an aeronautical study. ICAO does not specify a colour of the lower 1/3 of the wind turbine tower and therefore individual countries have discretion to determine this colour scheme. We work closely with the MCA and Trinity House on offshore wind turbine marking schemes and we are content with the Trinity House proposed colour scheme.</p> <p>The CAA requires that the rotor blades, nacelle and upper 2/3 of the supporting mast of wind turbines that are deemed to be an aviation obstruction to be painted white or light grey. Wind turbine manufacturers typically use the RAL Colour Standard, a four-digit code to identify a specific colour of paint. The CAA will accept a white paint</p>
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**Civil Aviation Authority**

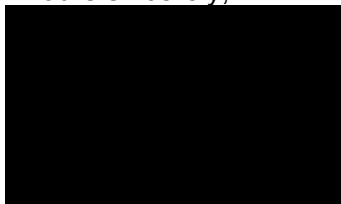
5<sup>th</sup> Floor, 11 Westferry Circus, London E14 4HD [www.caa.co.uk](http://www.caa.co.uk)  
[DCO.coordination@caa.co.uk](mailto:DCO.coordination@caa.co.uk)

		<p>colour that is pure white, RAL 9010, or an equivalent through to light grey, RAL 7035. Any shade of white between these two RAL specifications will also be accepted. These colours have been shown to be the most effective method for providing daytime conspicuity to aviators.</p>
<p>ARMC.1.2 Notification periods</p>	<p>CAA, Defence Infrastructure Organisation and Marine Management Organisation (MMO)</p>	<p>Are you supportive of the fourteen and five-day notification periods in Condition 12 of DML 1 [REP1-004] and do you have any other comments on the condition as drafted? The ExA notes this condition is repeated in other DMLs and will consider comments received relevant for all instances</p> <p><i>REP1-004: Dogger Bank South Offshore Wind Farms Draft Development Consent Order (Revision 05) (Clean) Volume 3, SCHEDULE 10 Deemed Marine Licence 1: DBS East Project Offshore Generation – Work Nos. 1A, 4A and 7A Part 2</i></p> <p><i>Condition 12 - Aviation Safety</i></p> <p><i>(1) The undertaker must exhibit such lights, with such shape, colour and character as are required in writing by the Air Navigation Order 2016(a) and determined necessary for aviation safety in consultation with the Defence Infrastructure Organisation Safeguarding and as directed by the Civil Aviation Authority.</i></p> <p><i>(2) The undertaker must notify the Defence Infrastructure Organisation Safeguarding, the Civil Aviation Authority and the MMO, at least 14 days prior to the commencement of the authorised scheme, in writing of the following information—</i></p> <ul style="list-style-type: none"> <li><i>(a) the date of the commencement of construction of the authorised scheme;</i></li> <li><i>(b) the date any wind turbine generators are to be installed;</i></li> <li><i>(c) the maximum height of any construction equipment or vessels to be used;</i></li> <li><i>(d) the maximum height of each wind turbine generator to be constructed;</i></li> <li><i>(e) the latitude and longitude of each wind turbine generator to be constructed; and the Defence Infrastructure Organisation Safeguarding and the Civil Aviation Authority must be notified of any changes to the information supplied under this paragraph and of the completion of the construction of the authorised scheme.</i></li> </ul> <p><i>Copies of notifications must be provided to the MMO within 5 days.</i></p> <p><b>CAA answer</b></p> <p>We are not supportive of the 14-day notification period in Condition 12(2) and would propose a 56-day notification period.</p> <p>56 days is consistent with the notification period in Article 225A(5)(a) of the Air Navigation Order 2016. This allows the Civil Aviation Authority sufficient time to ensure the UK</p>

		<p>aeronautical obstacle database is updated to provide aviators with information on the location of wind turbines and any other construction equipment that may pose a safety risk to low-level flight operations.</p> <p>We interpret “five-day notification periods in Condition 12” to refer to: 'Copies of notifications must be provided to the MMO within 5 days'. We have no comments on this notification period as it does not relate to the Civil Aviation Authority.</p> <p>The question states that the condition is repeated in other DMLs. We are unable to comment on other conditions as they may involve different circumstances.</p>
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If the ExA has further questions on these or any other topic, we will be happy to provide whatever assistance we can.

Yours sincerely,



Head of Policy