



MORAY WEST

OFFSHORE WINDFARM



Safety Zone Statement

Moray Offshore Windfarm (West) Limited

Application Supporting Document

Table of Contents

1	Introduction.....	1
1.1	Background.....	1
1.2	Legislative Context	1
1.3	Objectives	2
2	The Need for Safety Zones	3
3	Scope of the Safety Zone Application	4
3.1	Scope of Consent Application	4
3.2	Scope of Safety Zone Application.....	6

List of Figures

Figure 3.1	Moray West Boundaries	5
------------	-----------------------------	---

Copyright © 2018 Moray Offshore Windfarm (West) Limited

All pre-existing rights reserved.

Liability

In preparation of this document Moray Offshore Windfarm (West) Limited has made reasonable efforts to ensure that the content is accurate, up to date and complete. Moray Offshore Windfarm (West) Limited shall have no liability for any loss, damage, injury, claim, expense, cost or other consequence arising as a result of use or reliance upon any information contained in or omitted from this document.

Moray Offshore Windfarm (West) Limited
Safety Zone Statement

Acronyms	
Acronym	Expanded Term
BEIS	Department of Business, Energy, and Industrial Strategy
EIA	Environmental Impact Assessment
MCA	Maritime and Coastguard Agency
MS-LOT	Marine Scotland Licensing Operations Team
Moray West	Moray Offshore Windfarm (West) Limited
OREI	Offshore Renewable Energy Installation
OSP	Offshore Substation Platform
RAM	Restricted in Ability to Manoeuvre
WTG	Wind Turbine Generator

1 Introduction

1.1 Background

Moray West is planning to develop the Moray West Offshore Wind Farm and intends to submit an application for consent to the Scottish Ministers (via the Marine Scotland Licensing Operations Team (MS-LOT)) under Section 36 of the Electricity Act 1989. The Moray West Site is located within the Moray Firth, approximately 12 nautical miles (NM) from the Caithness coast (see Figure 3.1). Further information on the offshore wind farm is set out in the accompanying Environmental Impact Assessment (EIA) Report, in Chapter 4: Development Description.

This statement has been written to outline Moray West's intention to submit an application for safety zones around the offshore structures associated with the offshore wind farm to MS-LOT under section 95 (1, 2) of the Energy Act 2004 and for approval of the Scottish Ministers. The safety zone application will be made once the final number and positions of Wind Turbine Generators (WTGs) and Offshore Substation Platforms (OSPs) has been determined. On this basis it is currently anticipated that the safety zone application will be submitted post consent and prior to construction commencing.

The safety zone application would provide all of the information required by Part 2.3 of the Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007. In accordance with Section 95 of the Energy Act 2004, the Application will be made to the Scottish Ministers (via Marine Scotland).

The application will be for "standard" 500 m rolling safety zones around any structure (WTG or OSP) where construction work is being undertaken, as indicated by the presence of a large construction vessel(s), Restricted in Their Ability to Manoeuvre (RAM). Smaller 50 m safety zones will also be applied for around any partially completed structure where work is not underway, or around any completed structure prior to commissioning. During the operational phase, 500 m safety zones will be applied for around any structure where "major maintenance" is being undertaken, defined as any work requiring a large RAM vessel.

1.2 Legislative Context

The process for applying to MS-LOT for the establishment of a safety zone around an Offshore Renewable Energy Installation (OREI) is set out in section 95 and Schedule 16 of the Energy Act 2004. The provisions apply to territorial waters in or adjacent to England, Scotland and Wales and to waters in the UK Renewable Energy Zone.

The Electricity (Offshore Generating Stations) (Safety Zones) (Applications Procedures and Control of Access) Regulations 2007 (the 2007 Regulations) were introduced in August 2007 clarifying the process for applying for a safety zone and advertising such applications. Guidelines accompanying the 2007 Regulations were also published to assist applicants in the process of making an application for safety zones. It is noted that as of the 1st April 2017, Marine Scotland took responsibility for the safety zone application process from the Department of Business, Energy, and Industrial Strategy (BEIS) for any project located within Scottish Waters.

The provision for safety zones applies to all OREIs, including those which have already been consented and includes those which:

- are used (or will be used or, in the case of decommissioning, have been used) for purposes connected with the production of energy from water or winds;
- permanently rest on, or are permanently attached to, the bed of the waters; and

- are not connected with dry land by a permanent structure providing access at all times for all purposes.

The safety zone provision does not cover export cables or inter-array cables, or parts thereof, located outside an approved safety zone.

1.3 Objectives

This statement confirms Moray West's intention to submit an application for safety zones to MS-LOT and sets out the approach that will be taken during the application process.

This statement does not currently address in detail any safety zone requirements relating to the decommissioning phase. If, following consultation with relevant bodies such as the Maritime and Coastguard Agency (MCA), a safety zone is deemed to be advisable for the decommissioning of the Project, a further safety zone application would be made at the relevant time.

This statement addresses the following:

- The safety zones that will be applied for;
- The need (justification) for safety zones; and
- The scope of the application.

2 The Need for Safety Zones

Moray West intends to submit an application for safety zones around the WTGs, should consent be granted for the Development by MS-LOT. Safety Zones have been identified as being an essential embedded mitigation through the Formal Safety Assessment (FSA) undertaken in Chapter 12: Shipping and Navigation of the EIA Report, and within the supporting Navigation Risk Assessment (NRA). These documents form part of Moray West's consent application to MS-LOT. The safety zone application will present a full justification of the need for safety zones however a summary is provided below.

During the construction phase, Moray West will apply for 500 m safety zones around any WTG or OSP where construction work is underway, as denoted by the presence of a large RAM construction vessel. Smaller 50 m safety zones will also be applied for around any partially completed WTG or OSP when work is not underway, or around any completed structure prior to commissioning. These safety zones are considered necessary to protect technicians, crew and vessels on-site during construction, in addition to the structures themselves. It is also noted that during construction, the lighting and marking of the structures may not yet be operational and safety zones therefore provide an additional mitigation pre-commissioning.

During the operational phase, Moray West will apply for 500 m safety zones around any WTG or OSP where major maintenance (defined as any work requiring a large RAM vessel) is underway. Similarly, to the construction phase safety zones, these are considered necessary to protect the technicians, crew and vessels on-site during the maintenance work. Safety zones are not considered necessary during normal operations given mitigation measures in place. However, if a need was identified a case could later be made in line with the regulations.

Safety zones are also likely to be necessary during the decommissioning phase, however this will be determined at an appropriate stage when decommissioning plans are known via risk assessment. As such, the decommissioning phase will not be covered by the initial safety zone application, with a separate application submitted separately if such safety zones were deemed necessary.

3 Scope of the Safety Zone Application

3.1 Scope of Consent Application

A description of the Development for which consent is being sought is provided in the EIA Report - Chapter 4: Development Description. The extent of the offshore export cable corridor, and the Moray West site are presented in Figure 3.1, which shows the boundaries within which each of the below will be installed.

- Up to 85 WTGs;
- Up to two OSPs;
- A network of inter-array cables;
- Up to one OSP interconnector cable circuit; and
- Two offshore export cable circuits.

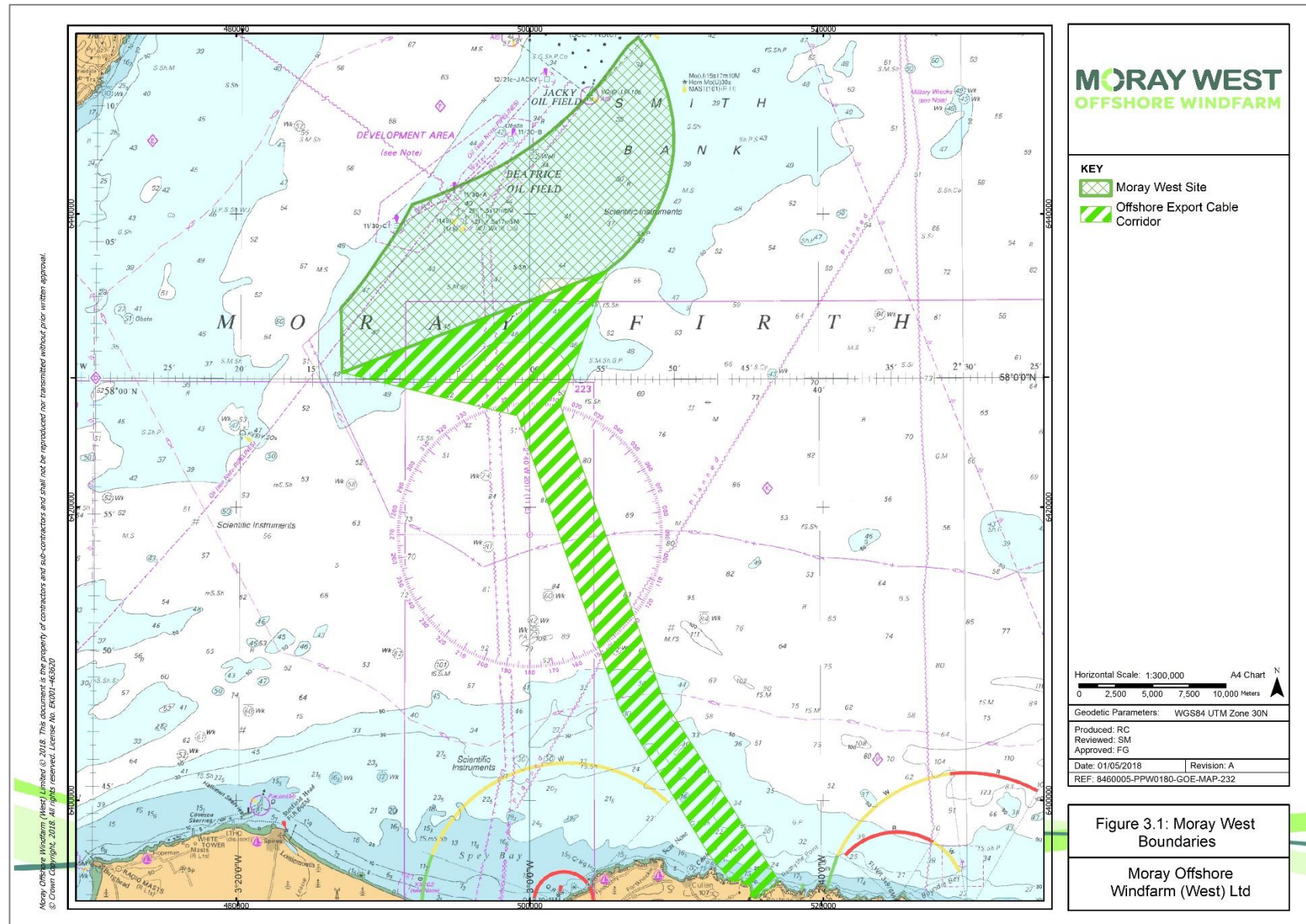


Figure 3.1 Moray West Boundaries

3.2 Scope of Safety Zone Application

Moray West intends to submit a safety zone application to MS-LOT following award of consent for the Development and completion of post consent design work, but prior to the commencement of construction. This is in line with the guidance on safety zone applications, which notes that following award of consent, the developer is likely to have taken decisions on various important technical issues which are pertinent to the safety zone application (for example, foundation type). Submitting the safety zone application post consent therefore ensures the contents of the application are based upon firm and up to date information.

The Electricity Regulations 2007 sets out the required contents of a safety zone application. In line with those requirements, the application submitted by Moray West will include:

- A map showing:
 - The location where the relevant renewable installation will be constructed, extended, operated, or decommissioned; and
 - The waters around the renewable installation(s) where a safety zone will be established as detailed within the application.
- A description of the installation and its proposed or existing location and dimensions (including an explanation of how much of it is (or is expected to be) visible above the water line and how much below it), supported by drawings;
- A description of how the installation operates (or is to operate);
- A description of the location (or proposed location) of:
 - Any subsea cables used (or proposed to be used) for the conveyance of electricity to or from the installation;
 - Any connection to such subsea cables;
 - A description of the location (or proposed location) of any offshore substation housing connection equipment;
 - Where the zone is sought in respect of more than one relevant renewable energy installation, the proposed or existing distance between such installations; and
 - Details of any navigational marking that has been specified for use with an installation of the description in question by a general lighthouse authority.
- Whether the zone relates to the construction, extension, operation or decommissioning of the relevant renewable energy installation;
- Whether the applicant seeks the declaration of a standard¹ safety zone, or if not, what dimensions are sought for the zone;
- A description of those works or operations in respect of which the zone is being applied for and their estimated date and duration;
- Whether the applicant proposes that the area of the zone will vary and any factors or determinations by reference to which the applicant proposes that such variation may take place;
- Whether the zone relates to major maintenance works in respect of a relevant renewable energy installation which has become operational;

¹ Standard size safety zones are 500 m for construction and major maintenance; and 50 m for pre-commissioning.

- A statement setting out what steps, if any, the applicant proposes to take to monitor vessels and activities within the zone;
- Except where the Scottish Ministers has notified the applicant that it is not required, an up to date Automatic Identification System (AIS) based shipping traffic survey for the waters comprising the zone; and
- An assessment of the extent to which navigation might be possible or should be restricted and whether restrictions would cause navigational problems within or near waters where the relevant renewable energy installation is to be, or is being, constructed, extended, operated or decommissioned, as the case may be.

The safety zone application submitted by Moray West will include the information required by Regulation 3, Part 2 of the 2007 Regulations as set out above. Standard safety zones will be applied for as follows:

- 500 m safety zones around any structure where construction work is underway, as indicated by the presence of a large RAM construction vessel(s);
- 50 m safety zones around any partially completed structure during the construction phase where work is not underway;
- 50 m safety zones around any completed structure prior to commissioning; and
- 500 m safety zones around any structure undergoing major maintenance during the operational phase, defined as work requiring a large or RAM vessel.

The 2007 Regulations also require notice of any application for safety zones to be publicised in prescribed media publications (both paper and digital), and a copy of the notice to be sent to:

- The harbour masters of ports whose users are in the opinion of the applicant likely to be affected by the application;
- The sector office of the MCA which is responsible for operations in the waters in which the safety zone is proposed or located; and
- The local office of the Marine and Fisheries Agency which is responsible for operations in the waters in which the safety zone is proposed or located.

In addition, the guidelines on the Regulations 2007 advise that applicants undertake early consultation with “interested parties” on their intent to submit an application, and it is noted that Marine Scotland will undertake consultation with various organisations and stakeholders upon receipt of a submitted application.

Moray West will comply fully with the prescribed publicity and notification requirements as set out in the 2007 regulations (and summarised above) and have already undertaken general consultation with shipping operators and statutory stakeholders including the MCA and the Northern Lighthouse Board (NLB). Prior to submission of the safety zone application to Marine Scotland, Moray West will undertake further consultation with regards to safety zones, ensuring stakeholder feedback is incorporated into the application.



MORAY WEST

OFFSHORE WINDFARM

Contact

Moray Offshore Windfarm (West) Limited
4th Floor, 40 Princes Street
Edinburgh EH2 2BY
Tel: +44 (0)131 556 7602

