

The logo for Moray East Offshore Windfarm. It features the word "MORAY EAST" in a bold, dark blue, sans-serif font. Below it, the words "OFFSHORE WINDFARM" are written in a lighter blue, sans-serif font. The letter "O" in "MORAY" is stylized as a circle with a vertical line through it. In the background, there is a large, light blue circular graphic composed of several curved segments, resembling a stylized sun or a wind turbine hub.

MORAY EAST

OFFSHORE WINDFARM

Safety Zone Application

Including Supporting Safety Case

April 2020

Moray Offshore Windfarm (East) Limited

Produced by Anatec Limited on behalf of Moray Offshore WindFarm (East) Limited



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List of Abbreviations

°	Degrees
AC	Alternating Current
AIS	Automatic Identification System
ALARP	As Low As Reasonably Practicable
AtoN	Aids to Navigation
Cd	Candela
CFMS	Commercial Fisheries Mitigation Strategy
CLV	Cable Lay Vessel
CMS	Construction Method Statement
COLREGs	International Regulations for the Prevention of Collisions at Sea
CP	Construction Programme
DSLP	Development Specification and Layout Plan
ERCoP	Emergency Response Cooperation Plan
ERP	Emergency Response Plan
FI	Flashing
FLO	Fisheries Liaison Officer
HAT	Highest Astronomical Tide
HLV	Heavy Lift Vessel
HDD	Horizontal Directional Drilling
HVAC	High Voltage Alternating Current
IALA	International Association of Marine Aids to Navigation and Lighthouse Authority
IMO	International Maritime Organization
IPS	Intermediate Peripheral Structure
JUP	Jack-up Construction Vessel
km	Kilometre
kV	Kilovolt
L	Long [navigational light identification]
LAT	Lowest Astronomical Tide
LMP	Lighting and Marking Plan
m	Metre
m/hr	Metres per hour
MCA	Maritime and Coastguard Agency
MCC	Marine Coordination Centre
MW	Megawatt
MORL	Moray Offshore Renewables Limited

NLB	Northern Lighthouse Board
nm	Nautical Mile
NRA	Navigational Risk Assessment
NSP	Navigational Safety Plan
OfTI	Offshore Transmission Infrastructure
OSP	Offshore Substation Platform
PLGR	Pre-lay Grapnel Run
Q	Quick [navigational light identification]
RAM	Restricted in their Ability to Manoeuvre
ROV	Remotely Operated Vehicle
s	Second
SAR	Search and Rescue
SCADA	Supervisory Control and Data Acquisition
SOLAS	Safety of Life at Sea
SOP	Standard Operating Procedures
SOV	Service Operations Vessel
SPS	Significant Peripheral Structure
UK	United Kingdom
UKHO	United Kingdom Hydrographic Office
V	Very [navigational light identification]
VHF	Very High Frequency
VMP	Vessel Management Plan
W	White [navigational light identification]
WROV	Work Class Remotely Operated Vehicle
WTG	Wind Turbine Generator
Y	Yellow [navigational light identification]

Definitions

The following definitions have been used throughout this document with respect to the company, the consented wind farms and how these definitions have changed since submission of the Moray East Environmental Statement (ES) in 2012 and the Modified Transmission Infrastructure ES in 2014.

- **Moray Offshore Windfarm (East) Limited (formerly known as Moray Offshore Renewables Limited and hereinafter referred to as Moray East)** – the legal entity submitting this Safety Zone Application;
- **Moray East Offshore Wind Farm** - the wind farm to be developed in the Moray East site (also referred as the Wind Farm);
- **The Moray East site** - the area in which the Moray East Offshore Wind Farm will be located. Section 36 Consents and associated Marine Licences to develop and operate up to three generating stations on the Moray East site were granted in March 2014. At that time the Moray East site was known as the “Eastern Development Area (EDA)” and was made up of three sites known as the Telford, Stevenson and MacColl offshore wind farm sites; The Section 36 Consents and Marine Licences were subsequently varied in March 2018;
- **Telford, Stevenson and MacColl wind farms** – these names refer to the three consented offshore wind farm sites located within the Moray East site;
- **Transmission Infrastructure (TI)** – includes both offshore and onshore electricity transmission infrastructure for the consented Telford, Stevenson and MacColl wind farms. Includes connection to the national electricity transmission system near New Deer in Aberdeenshire encompassing AC offshore substation platforms (OSPs), AC OSP interconnector cables, AC export cables offshore to landfall point at Inverboyndie continuing onshore to the AC collector station (onshore substation) and the additional regional Transmission Operator substation near New Deer. A Marine Licence for the offshore TI was granted in September 2014 and a further Marine Licence for two additional distributed offshore substation platforms (OSPs) was granted in September 2017. The onshore TI was awarded Planning Permission in Principle in September 2014 by Aberdeenshire Council and a Planning Permission in Principle under Section 42 in June 2015;
- **Offshore Transmission Infrastructure (OfTI)** – the offshore elements of the transmission infrastructure, comprising AC OSPs, OSP inter-connector cables and AC export cables offshore to landfall (for the avoidance of doubts some elements of the OfTI will be installed in the Moray East site);
- **Moray East ES 2012** – The ES for the Telford, Stevenson and MacColl wind farms and Associated Transmission Infrastructure, submitted August 2012;
- **Moray East Modified TI ES 2014** – the ES for the TI works in respect to the Telford, Stevenson and MacColl wind farms, submitted June 2014;
- **The Development** – the Moray East Offshore Wind Farm and OfTI;
- **Development Area** – the area formed by the Moray East site and the Moray West site;
- **Design Envelope** - the range of design parameters used to inform the assessment of impacts; and
- **OfTI Corridor** – the export cable route corridor, i.e. the OfTI area as assessed in the Moray East Modified TI ES 2014 excluding the Moray East site.

- **Moray East Offshore Wind Farm Consents** – are comprised of the following:

Section 36 Consents:

- Section 36 consent for the Telford Offshore Wind Farm (as varied) – consent under Section 36 of the Electricity Act 1989 for the construction and operation of the Telford Offshore Wind Farm assigned to Moray East on 19 June 2018.
- Section 36 consent for the Stevenson Offshore Wind Farm (as varied) – consent under Section 36 of the Electricity Act 1989 for the construction and operation of the Stevenson Offshore Wind Farm assigned to Moray East on 19 June 2018.
- Section 36 consent for the MacColl Offshore Wind Farm (as varied) – consent under Section 36 of the Electricity Act 1989 for the construction and operation of the MacColl Offshore Wind Farm assigned to Moray East on 19 June 2018.

Marine Licences

- Marine Licence for the Telford Offshore Wind Farm (as varied) – Licence Number: 04629/19/0 – consent under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on 19 July 2018.
- Marine Licence for the Stevenson Offshore Wind Farm (as varied) – Licence Number: 04627/19/0 – consent under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on 19 July 2018.
- Marine Licence for the MacColl Offshore Wind Farm (as varied) – Licence Number: 04628/19/0 – consent under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on 19 July 2018.

- **OfTI Licences** – are comprised of the following:

- Marine Licence for the Offshore Transmission infrastructure – Licence Number 05340/19/0 – consent under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area (referred to as the “OfTI Marine Licence”).
- Marine Licence for two additional distributed OSPs – Licence Number 06347/19/0 – consent under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing for marine renewables construction, operation and maintenance works and the deposit of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area (referred to as the “OSP Marine Licence”).

Executive Summary

This document has been prepared to provide the required information to Marine Scotland (who administer such applications on behalf of the Scottish Ministers) to determine an application for the use of safety zones at the Moray East Offshore Wind Farm and associated Offshore Transmission Infrastructure (OfTI) (together known as the Development) as per Section 95 and Schedule 6 of the Energy Act 2004 and the Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007 (hereinafter also referred to as the “Electricity Regulations 2007”) respectively.

Marine Scotland has previously approved an application for safety zones to be used by the Development. However, this new application is being submitted due to an increase in the number of active safety zones needed during the construction phase (an increase from three to ten). No other relevant parameters or construction methods have changed from the originally approved application. Moray East are not seeking any changes to the safety zones already approved for the operations and maintenance phase.

This Safety Zone Application outlines the types of safety zone which have been applied for within the previous application. It also details this new request for up to ten 500m construction safety zones to be used at one time (in place of the previously requested three) and is based on changes to the project’s understanding of mitigations required to manage safety during the construction phase. A summary of the various infrastructure and works which shall be undertaken whilst safety zones are in place is also included.

Lighting and marking to be implemented during the construction and operation and maintenance phases are considered, and a validation of the Automatic Identification System (AIS) and Radar data submitted as part of the Navigational Risk Assessment (NRA) in 2010 has been undertaken.

A safety case has been made to justify this application for safety zones by summarising the potential risks associated with the Development. The potential impacts arising due to the presence of safety zones have been identified, and the promulgation, monitoring and policing of safety zones has been outlined.

1 Introduction

1.1 Background

In March 2014, subsidiaries of Moray Offshore Windfarm (East) Limited (Moray East), formerly known as Moray Offshore Renewables Limited (MORL), received consent from the Scottish Ministers under Section 36 of the Electricity Act 1989, and at the same time were granted associated Marine Licences under the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009, for the construction and operation of the Moray East Offshore Wind Farm (hereafter referred to as the 'Development'). At that time the development area (the Moray East site) was known as the "Eastern Development Area" and was made up of three sites known as the "Telford", "Stevenson" and "MacColl" offshore wind farm sites. In March 2018 the Section 36 consents were varied together with the relevant Marine Licences. The Section 36 licences and Wind Farm Marine Licences were assigned / transferred to Moray East in 2018 and the Wind Farm Licences were varied in July in 2019.

A Marine Licence (under the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009) was granted in September 2014 and varied in July 2019 for the Offshore Transmission Infrastructure (OfTI) and a further Marine Licence for two additional distributed Offshore Substation Platforms (OSPs) was granted in September 2017 and varied in July 2019 (together these are referred to as the OfTI Licences).

Moray East is a joint venture partnership between EDP Renewables, Engie, Diamond Generating and China Three Gorges, and has been established to develop, finance, construct, operate, maintain and decommission the Moray East Offshore Wind Farm.

The Moray East site is located approximately 12 nautical miles (nm) southeast of the Caithness coast and 22 nm north of Portknockie on the Moray coast. Three subsea export cable circuits shall be installed and shall make landfall at Inverboyndie Bay in Aberdeenshire. Further details of the Moray East Offshore Wind Farm and associated OfTI (together known as the Development) are provided in Section 3.

Construction of the Development began in May 2019, and Marine Scotland has previously granted safety zones for use during the construction phase and during periods of major maintenance in the operational phase following submission of a prior Safety Zone Application in Quarter 1 of 2019. The following safety zones were granted under this application, and as such can currently be utilised within the Moray East site:

- Mandatory "rolling" 500 metres (m) safety zones established around each wind farm or OfTI structure (both Wind Turbine Generators (WTG) and OSPs) and/or their foundations whilst construction works are in progress, as indicated by the presence of a construction vessel (including Service Operation Vessels (SOV) whilst displaying Restricted in their Ability to Manoeuvre (RAM) status). Up to three such 500m safety zones at any one time are allowed.
- Mandatory pre commissioning 50 m safety zones established around each wind farm or OfTI structure (both WTGs and OSPs) and/or their foundations when construction works have been completed but prior to the commissioning of the Development or where construction works have only been partially completed. Up to 103 of the 50 m safety zones are allowed (as the Development comprises 100 WTGs and three OSPs).
- Mandatory 500 m safety zones around all "major maintenance" work being undertaken (see Section 7).

1.2 Objectives of this Document

As per Section 95 and Schedule 16 of the Energy Act 2004 and the Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007 respectively, a Safety Zone Application can be made to Marine Scotland for safety zones for offshore wind farms within Scottish waters. On this basis Anatec Limited has been commissioned by Moray East to prepare this Safety Zone Application for the Moray East Offshore Wind Farm.

1.2.1 Justification

Moray Offshore Windfarm (East) Ltd's key priority and purpose for this amendment to its previous safety zone application is to continue to manage safe construction activities and third-party navigation by continuing to monitor industry best practice and continue to risk assess its activities to ensure all necessary mitigations are in place.

As per Section 1.1, Marine Scotland has previously granted safety zones for use during the construction phase and during periods of major maintenance in the operational phase following submission of a prior Safety Zone Application. However, since construction on Moray East began there has been updated industry wide understanding through use and application of the safety zone regulatory guidance¹, including how safety zones are applied, what vessel types they should apply to in order to manage safe navigation (including the development of SOV methodologies).

Therefore, in order to align with industry good practice, provide greater clarity to all users within the area, and continue to manage safe navigation, Moray East is seeking an increase in the number of concurrent 500m safety zones that can be active at any given time during the construction phase (from three to ten). This increase has been risk assessed as necessary for the safety of project vessels, project personnel, and third-party traffic, by ensuring that risks are within As Low As Reasonably Practicable (ALARP) parameters but also allows third party users to clearly identify installation activities and allow effective passage planning to avoid areas that are not safe for navigation.

It is emphasised that the only change between the safety zones applied for in the prior application and those applied for in this application is the increase in the number of 500m safety zones that can be active at any given time during the construction phase, given the more detailed understanding now available of vessel types required for installation activities. Further, the maximum applied for (ten) is considered a worst-case value and it is anticipated that, typically, a smaller number of safety zones will be concurrently active.

The safety zones in the following subsections are designed to manage potential interactions between third party vessels and the Moray East construction and maintenance activities, with a view to securing the safety of the assets and other installations, individuals and third-party vessels and crews in their vicinity.

It is noted that an application is being made only for surface infrastructure associated with the Wind Farm and the OfTI (i.e., the OSPs) which will be located within the Moray East site. The OfTI infrastructure located outside the Moray East site (i.e., the export cables) is not included in this application, given that the relevant legislation only allows for safety zones around fixed structures. Moray East are not seeking any changes to the safety zones already approved for the operations and maintenance phase.

1.2.2 Construction Phase – New Request and Existing Safety Zones

An increase in the number (change from three to up to ten at any one time) of 500m safety zones over that currently allowed is being applied for during the construction phase:

- ***Mandatory “rolling” 500 metres (m) safety zones established around each wind farm or OfTI structure (both (WTGs and OSPs) and/or their foundations whilst construction works are in progress, as indicated by the presence of a construction vessel (including SOVs) whilst displaying RAM status). Triggering of the safety zone will only include the SOV when it is attached to or on station next to a structure. It is expected that no more than ten of these 500 m safety zones will be active at any one time.***

Moray East are not seeking any changes to the 50m pre commissioning safety zones already approved for the construction phase. These are:

¹ The Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007

- Mandatory pre commissioning 50 m safety zones established around each wind farm or OfTI structure (both WTGs and OSPs) and / or their foundations when construction works have been completed but prior to the commissioning of the Development or where construction works have only been partially completed. Up to 103 of the 50 m safety zones will be active at any given time, given that the Development will comprise of 100 WTGs and three OSPs.

1.2.3 Operation and Maintenance Phase – Existing Safety Zones

Moray East are not seeking any changes to the safety zones already approved for the operations and maintenance phase. These are:

- Mandatory 500 m safety zones around all “major maintenance” work being undertaken. Major maintenance is defined as any activity involving large vessels such as Jack-up Construction Vessels (JUP), floating barges and Heavy Lift Vessels (HLV) which are RAM. Major maintenance includes the use of SOVs displaying RAM status. Triggering of the safety zone will only include the SOV when it is attached to or on station next to a structure. It is considered likely that no more than one 500 m major maintenance safety zone will be active at any given time during the operational phase (noting in particular that there will be not be more than one SOV on site at any one time during the operational phase, see Section 8).

Note: Safety zones for the decommissioning phase of the Development shall be applied for separately, prior to any such operations taking place.

2 Compliance with Relevant Legislation

Schedule 16 of the Energy Act 2004 requires that specific information is included within any application for safety zones submitted under Section 95. Table 2.1 summarises the requirements, and provides reference to where each is addressed within this application.

Table 2.1: Energy Act 2004 Schedule 16 Applications and proposals for notices under section 95 – completion of requirement

Item	Requirement	Where Addressed within this Document
3(1) An application for a safety zone notice must describe, by way of a map –	<p>(a) The place where the relevant renewable energy installation is to be, or is being, constructed, extended, operated or decommissioned.</p> <p>(b) The waters in relation to which any declaration applied for will establish a safety zone.</p>	<p>Figure 3.1 and Figure 3.2 provide the location of the Development and installations on United Kingdom Hydrographic Office (UKHO) Admiralty Charts.</p> <p>Figure 3.1 and Figure 3.2 provide details relating to the waters within and in proximity to the Development on UKHO Admiralty Charts.</p>
3(2) The application must also –	<p>(a) Describe the other provisions the application asks to be included in the notice applied for; and</p> <p>(b) Include such other information as may be prescribed by regulations made by the appropriate minister².</p>	Requirements under the Electricity Regulations 2007 are outlined in Table 2.2.
3(3)	An application is not allowed to be made orally.	This document constitutes a written application to Marine Scotland.

Table 2.2 summarises where the relevant requirements from the Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007 has been addressed within this document. It is noted that Marine Scotland has responsibility for all applications received after 1st April 2017 (powers transferred from BEIS under Section 62 of the Scotland Act 2016) and their own Standard Operating Procedures (SOP) have also been considered (which are based on the Electricity Regulations 2007).

² It should be noted that the application is being made to Marine Scotland as the relevant authority for the safety zone process for offshore wind farms in Scottish waters.

Table 2.2: Compliance with the Electricity Regulations 2007

Item	Requirement	Where Addressed within this Document
3. An application for the declaration under section 95(2) of a safety zone must include the following information (in addition to that required by paragraph 3(1) and 3(2)(a) of Schedule 16)— (a) In relation to any proposed or existing relevant renewable energy installation –	(i) 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.	The locations of the installations are provided in Figure 3.2. A description of the various components required is provided in Section 4 and includes key properties for each type of infrastructure.
	(ii) A description of how the installation operates (or is to operate).	Overviews of processes during the construction phase and operation and maintenance phase is provided in Section 6 and Section 7, respectively.
	(iii) A description of the location (or proposed location) of: (aa) Any electric line used (or proposed to be used) for the conveyance of electricity to or from the installation; and (bb) Any connection to such an electric line.	A description of cabling for the Development including export cables, inter-array cables and inter-connector cables is provided in Section 5.4.
	(iv) A description of the location (or proposed location) of any offshore sub-station housing connection equipment.	The locations of the OSPs are provided in Figure 3.2.
	(v) Where the zone is sought in respect of more than one relevant renewable energy installation, the proposed or existing distances between such installations.	Proposed distances (which will be in excess of minimum spacing) between installations are provided in Section 3.1 .
	(vi) Details of any navigational marking that has been specified for use with an installation of the description in question by a general lighthouse authority.	Details of navigational lighting and marking to be implemented during the construction and operation and maintenance phases are outlined in Section 9.
3(c) In relation to the proposed safety zone –	(i) Whether the zone relates to the construction, extension, operation or decommissioning of the relevant renewable energy installation.	The safety zones to be applied for (including the relevant phases) are stated in Section 1.2.
	(ii) Whether the applicant seeks the declaration of a standard safety zone, or if not, what dimensions are sought for that zone.	The safety zones to be applied for (including the dimensions) are stated in Section 1.2.
	(iii) A description of those works or operations in respect of which the zone is being applied for and their estimated date and duration.	The safety zones to be applied for (including the related work) are stated in Section 1.2. The scheduled dates for construction processes are provided in Section 3.2.

Item	Requirement	Where Addressed within this Document
	<p>(iv) 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.</p> <p>(v) Whether the zone relates to major maintenance works in respect of a relevant renewable energy installation which has become operational.</p> <p>(vi) A statement setting out what steps, if any, the applicant proposes to take to monitor vessels and activities within the zone.</p> <p>(vii) Except where the Secretary of State has notified the applicant that it is not required, an up to date shipping traffic survey for the waters comprising the zone.</p>	<p>Not applicable to the Development.</p> <p>The safety zones to be applied for include zones for major maintenance activities as stated in Section 1.2.</p> <p>Planned monitoring is outlined in Section 13.2.</p> <p>A review of Automatic Identification System (AIS) data for the area recorded in 2018 has been undertaken and is discussed in Section 10.</p>
3(d)	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.	A risk assessment for safety zones is provided in Section 11 and potential navigational risks due to the presence of the safety zones are identified and assessed in Section 12.
4(1) The applicant shall publish notice of an application—	<p>(a) In two successive weeks in one or more local newspapers which are likely to come to the attention of those likely to be affected by the safety zone.</p> <p>(b) In <i>Lloyd's List</i> and in one or more national newspapers.</p> <p>(c) If there are in circulation one or more appropriate fishing trade journals which are published at intervals not exceeding one month, in at least one such trade journal.</p> <p>(e)⁴ In the case of an application relating to a safety zone proposed or located wholly or partly in an area of Scottish waters or an area of waters in the Scottish part of the Renewable Energy Zone(1), the <i>Edinburgh Gazette</i>.</p>	<p>Notice of the application shall be published in the following³:</p> <ul style="list-style-type: none"> • Press and Journal (local newspaper); • Lloyd's List; • Herald; • Fishing News; • Kingfisher; and • Edinburgh Gazette

³ This list of publications is in line with those used for the previous application process.

⁴ Points (d) and (f) relate to safety zones located in non-Scottish waters and therefore are not applicable to the Development.

Item	Requirement	Where Addressed within this Document
4(2) The applicant shall, at the same time as publishing the notice under paragraph (1)(a), send a copy of the notice to— —requesting that the notice be displayed for a period of not less than 14 days at an address accessible during normal office hours to members of the public likely to be affected by the application.	(a) The harbour masters of ports whose users are in the opinion of the applicant likely to be affected by the application (b) The sector office of the Maritime and Coastguard Agency which is responsible for operations in the waters in which the safety zone is proposed or located.	<p>Notice of the application shall be sent to the following local harbour masters⁵:</p> <ul style="list-style-type: none"> • Banff; • Invergordon; • Lossiemouth; • Macduff; • Nairn; and • Wick. <p>Aberdeen Coastguard Operations Centre under the remit of the Offshore Renewable Energy Liaison Officer.</p>

⁵ This list of ports is in line with those contacted as part of the previously approved application.

3 Development Overview

This section provides a brief overview of the Development relevant to this Safety Zone Application and sets out the main roles and responsibilities in relation to Moray East and the key contractors. Further information is provided in the Development Specification and Layout Plan (DSLPL).

As per Section 1.2, it should be considered that construction began in May 2019, and as such certain infrastructure is already in place at the time of writing.

3.1 Development Overview and Layout

Once complete, the Development shall consist of the following main components:

- A total generating capacity of approximately 950 Megawatt (MW), however the total generation capacities will be constrained by the transmission entry capacity of 900 MW (further details provided within the DSLPL);
- Up to 100 WTGs of no greater than 10MW each;
- Jacket substructures each installed on three pile foundations driven into the seabed;
- Three Alternating Current (AC) OSPs to collect the generated electricity and transform the electricity for transmission to shore;
- A network of inter-array, buried or mechanically protected (if burying is not possible), subsea cable circuits to connect strings of turbines together and to connect the turbines to the OSPs;
- Two inter-connector cable circuits that link the OSPs to one another;
- Three buried or mechanically protected (if burying is not possible) subsea export cable circuits, to transmit the electricity from the OSPs to the landfall at Inverboyndie Bay and connecting to the onshore buried export cable circuits for transmission to the onshore substation and connection to the national electricity transmission system; and
- Minor ancillary works such as the deployment of met buoys and permanent navigational marks.

The location of the Development in the Moray Firth is shown in Figure 3.1.

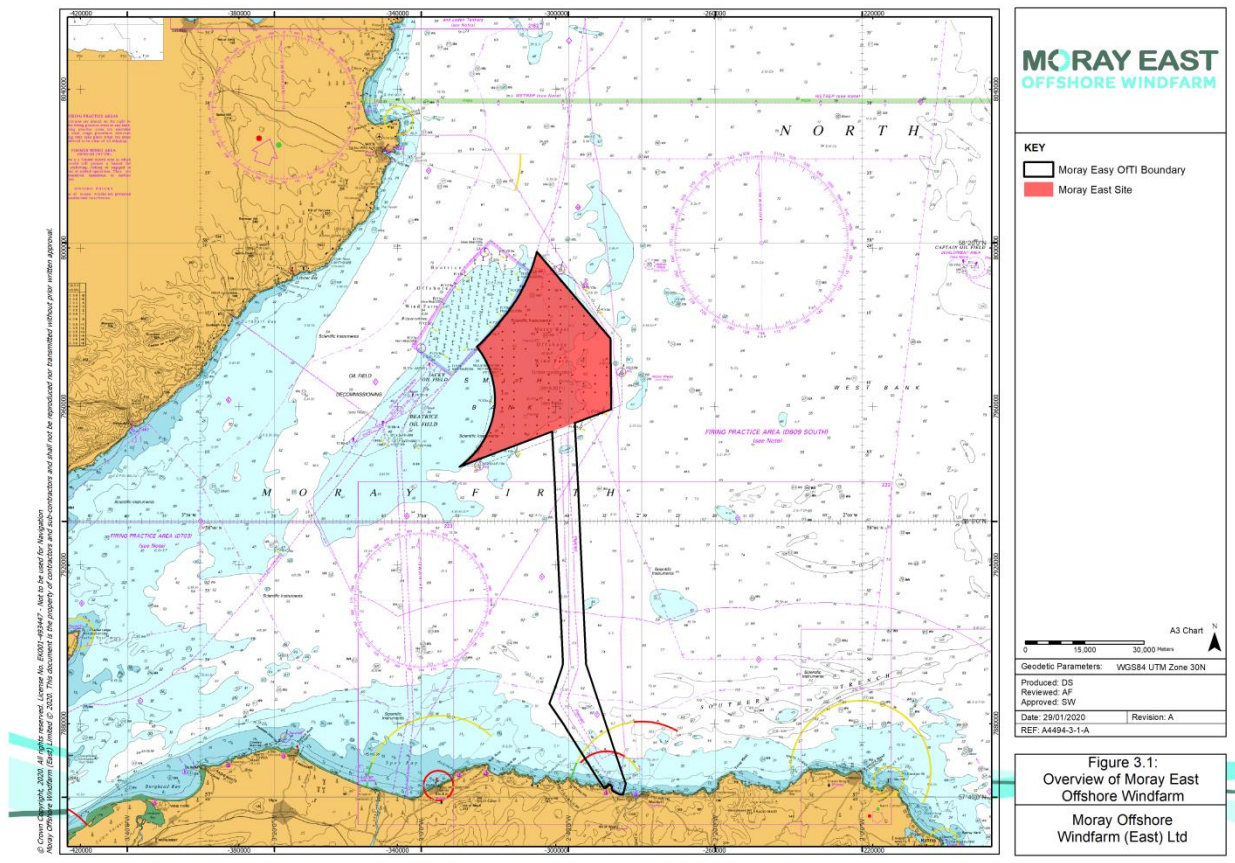


Figure 3.1: Overview of the Development

The final layout of WTGs and OSPs, subject to confirmation through final project design and engineering work, is presented in Figure 3.2. As indicated in Figure 3.2, this included up to seven spare locations which would only have been utilised where circumstances dictated their use as necessary (e.g., ground conditions at a given location are such that there is a high risk of pile refusal). This includes where such issues are encountered during the foundation installation stage at one or more of the WTG or OSP locations that cannot be overcome by micro-siting.

Piling operations were completed in February 2020 and no use of spare locations was required.

The standard spacing between WTGs in the north to south axis is 1,128 m and in the east to west axis is 1,547 m. However, there are a small number of cases where the north to south axis spacing shall differ from this, with an overall minimum spacing of approximately 1,120 m.

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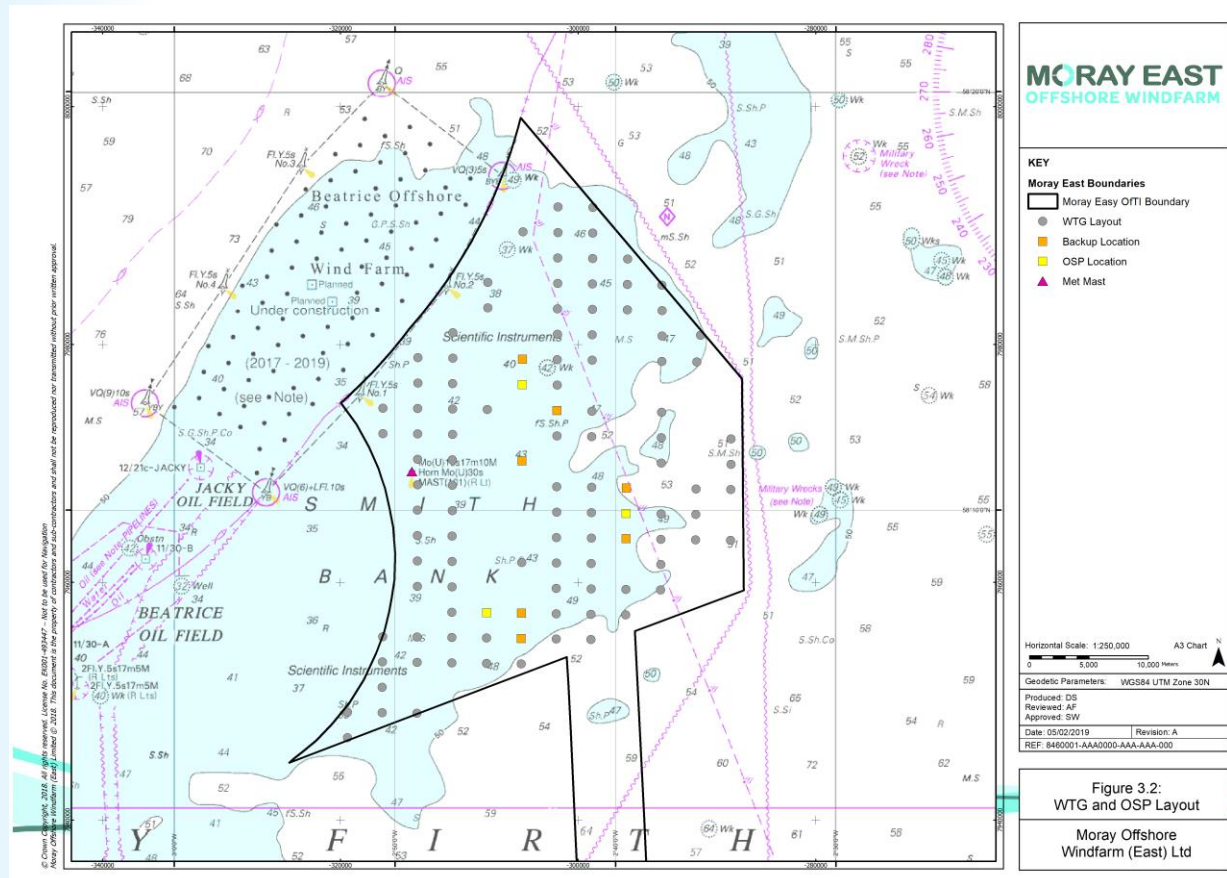


Figure 3.2: WTG and OSP Layout

3.2 Development Schedule

Offshore construction activities commenced in May 2019 with piling at the Moray East site and horizontal directional drilling (HDD) at the landfall location (offshore “punch-out”). The Development is expected to be at full generation in April 2022.

The current construction programme is presented in Figure 3.3. It is noted that the construction programme is valid as of February 2020, and may be subject to change due to a number of factors such as weather delays.

At the time of submission of this application to Marine Scotland, piling operations have recently been completed for all the WTGs and OSPs within the Moray East site.

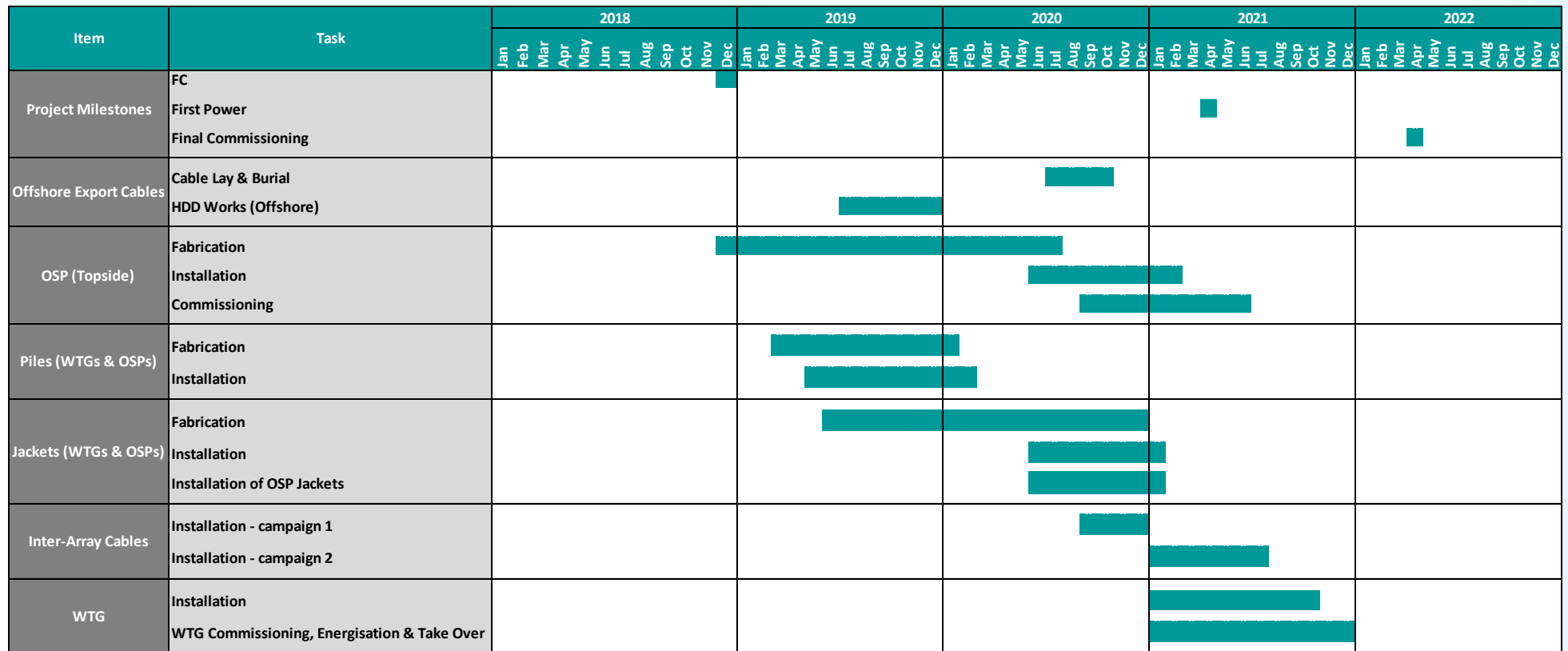


Figure 3.3: Indicative Construction Programme

4 Wider Context

The Safety Case supporting this Safety Zone Application represents one of a number of documents relevant to navigational safety for the Development. Other relevant documentation includes the following:

- Construction Programme (CoP) and Construction Method Statement (CMS) document;
- Development Specification and Layout Plan (DSLPL);
- Emergency Response Cooperation Plan (ERCoP);
- Emergency Response Plan (ERP);
- Lighting and Marking Plan (LMP); and
- Vessel Management Plan (VMP) and Navigational Safety Plan (NSP) document.

It is also noted that, as discussed in Section 1.1, Moray East has submitted a prior application for safety zones to Marine Scotland (Doc Ref: 8460001-PPL0050-ANA-REP-001), which was subsequently approved.

5 Project Components

5.1 Foundations

The foundations for the WTGs comprise of three steel pin piles and a three-legged tubular steel lattice jacket substructure. The maximum diameter of each pile is 2.5 m with a maximum pile length of 60 m. As noted in Section 3.2, at the time of submission of this application all the piles have already been installed.

Figure 5.1 presents an illustration of the WTG support structures.

5.2 Wind Turbine Generators

5.2.1 Wind Turbine Generator Properties

Once complete, the Development shall consist of 100 WTGs, each with a generating capacity of up to 10 MW. Table 5.1 summarises the key properties of the WTGs deemed relevant to this Safety Zone Application.

Table 5.1: WTG Properties

Manufacturer	MHI Vestas
Number of WTGs	100
Generating capacity (per WTG)	Up to 10 MW
Rotor diameter	164 m
Number of blades	3
Maximum blade width	5.4 m
Hub height above Lowest Astronomical Tide (LAT)	114 to 117 m
Tip height above LAT	196 to 199 m
Interface height (foundation to transition piece) above LAT	23.4 to 26.9 m
Clearance blade tip to sea surface above LAT	31 to 35 m

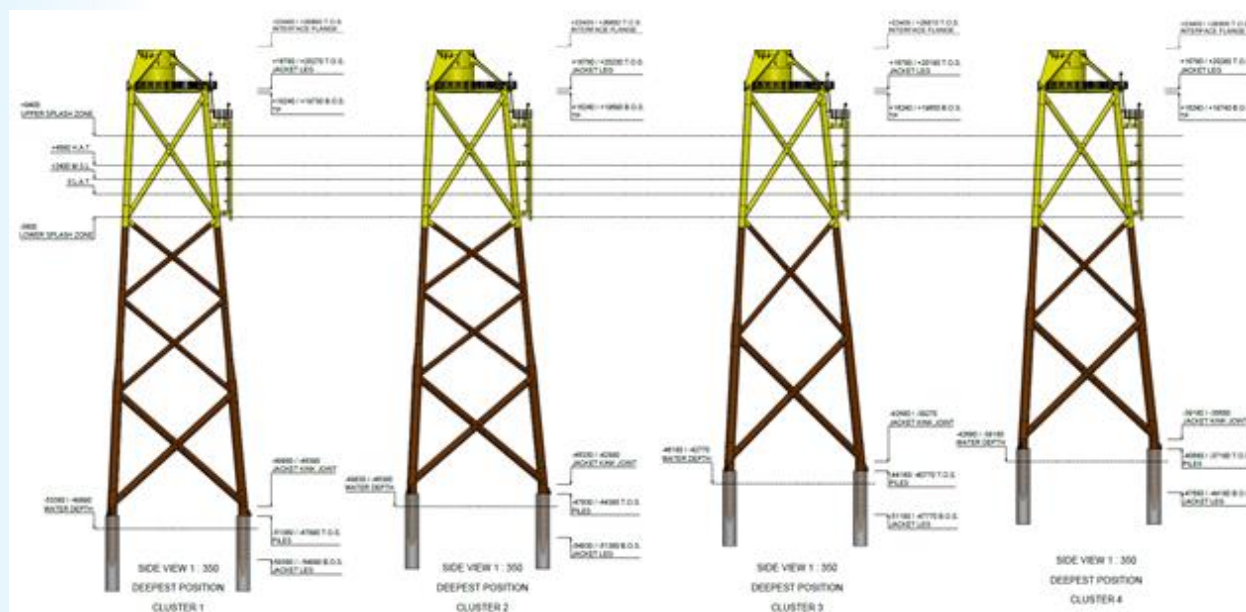


Figure 5.1: Illustration of WTG Support Structures

All structures within the array shall be equipped with a Supervisory Control and Data Acquisition (SCADA) system which shall allow remote supervision of the behaviour and control of all WTGs on an individual basis and also the Moray East site as a whole.

5.2.2 Scour Protection

The current support structure design means that no scour protection will be required around the majority of foundation structures, thereby reducing impacts on seabed habitats as a result of the placement of scour protection material. However, it is anticipated that a minority of the WTG foundations (up to 10 WTGs) located in areas of soft soils will require scour protection. In addition, foundations for each of the three OSPs will require scour protection due to the number of cables terminating into the corresponding jackets.

Where required, the scour protection system will consist of materials deposited on the seabed either prior to or post pile installation in the form of a filter layer and surface rock placement.

5.3 Offshore Substation Platforms

The Development shall include three OSPs, each supported by the same tubular jacket substructure and foundation piles as that of the WTGs (see Section 5.1). Table 5.2 summarises the key dimensions of the OSPs.

Table 5.2: Key Dimensions of the OSPs

OSP topside dimensions (length × width × height)	33×30.7×26.9 m
Height of OSP jacket above LAT	20.4 m
Height of topside above LAT	35 m

5.4 Cabling

5.4.1 Export Cables

Three 220 Kilovolt (kV) standard High Voltage Alternating Current (HVAC) subsea export cable circuits shall run between the OSPs and the landfall location at Inverboyndie Bay on the Aberdeenshire coast, with a total length of approximately 95.4 nm. The export cables shall be buried within the sea sediments along their length wherever possible. In locations where this is not possible, the cables will be mechanically protected.

5.4.2 Inter-Array Cables

Fifteen strings of 66 kV inter-array cables with a total length of approximately 84.2 nm (not accounting for micro-siting) shall be arranged in strings across the Moray East site, with each likely to connect four to eight WTGs. The length of individual inter-array cables shall vary between a minimum of approximately 0.6 nm up to a maximum of approximately 2.1 nm.

5.4.3 Inter-connector Cables

The three OSPs will be linked via two 66 kV inter-connector cables. The total length of these cables will be approximately 10 nm.

6 Construction Overview

Crew transfers (including use of a SOV) during the construction phase are being undertaken from various local ports within the Moray Firth and East coast of Scotland.

The following subsections briefly outline the methodology for construction of each offshore component of the Development.

6.1 Foundations

Foundations were delivered to Invergordon prior to mobilisation offshore for installation.

The foundation pin piles were installed using a self-propelled jack-up construction vessel (JUP), equipped with heavy lift craneage suitable for the pile lifting and installation operations. Figure 6.1 presents the MV Apollo, which was used for these operations.

As per the construction schedule shown in Figure 3.3, all piles have already been installed.



Figure 6.1: Image the MV Apollo

6.2 Wind Turbine Generators and Offshore Substation Platforms

WTG components shall be delivered to a north east port from other construction bases in the UK and mainland Europe, where they shall be stored in an onshore laydown area for pre-assembly prior to loadout for installation.

A JUP shall be loaded with four complete turbines for each trip to the Moray East site. Once jacked down at the WTG location a walk to work gangway shall be put in place to allow access to the foundation. The WTG tower shall be installed at each location, followed by the nacelle and blades.

The OSP topsides consist of two decks and a winch pad which shall be assembled as a single unit prior to being loaded onto a barge and transported to the Moray East site. An HLV shall lift the topside, and subsequently secure it onto the jacket substructure.

6.3 Cabling

6.3.1 Inter-array and Inter-connector cables

Prior to the installation of inter-array and inter-connector cables an installation support vessel shall mobilise at the Moray East site. Activities undertaken by this vessel shall include foundation inspection and pull-in equipment set-up, installation / checking of messenger lines located in the cable pull-in J-tubes, removal of the subsea and topside J-tube exit covers and a pre-construction survey of each cable route using a Work Class Remotely Operated Vehicle (WROV).

It is anticipated that inter-array and inter-connector cables shall be transported directly to the Moray East site from the manufacturing facility by a Cable Lay Vessel (CLV).

The CLV shall install the inter-array and inter-connector cables string by string with the installation support vessel preparing each structure for cable installation. The normal cable lay speed is anticipated to be between 400 and 600 metres per hour (m/hr).

Once installed the inter-array and inter-connector cables shall primarily be protected by burial. A Dynamic Positioning 2 class (DP2) trenching support vessel shall undertake this activity using trenching tools and a survey Remotely Operated Vehicle (ROV). Where trenching of the cable is not practical the installation of rock placement is required. This shall be undertaken by a DP fallpipe vessel with the operation monitored by the fallpipe ROV.

6.3.2 Export Cables

HDD operations have been completed at the landfall location at Inverboyndie Bay.

The cable layer vessel will transport the export cables to the Moray East site.

There are a number of offshore processes which may need to be undertaken in the installation of the export cables including:

- Pre-lay Grapple Run (PLGR);
- Pre-lay boulder clearance;
- Cable collection;
- Cable installation;
- Cable free-lay and second end pull-in;
- Cable Burial; and
- Post installation survey.

The PLGR shall be undertaken in order to reduce the risk of a cable being laid on debris and shall be performed by a standard anchor handling vessel. Such a vessel shall then undertake boulder clearance work using a towed plough unit, with an ROV available to support the operations particularly during launch and recovery.

Having delivered the export cables, the chosen cable laying vessel is also anticipated to undertake the installation. Prior to its arrival, the HDD ducts at the approach to the landfall point shall be inspected and cleaned utilising divers and a small multicat or jack-up to assist. Following this, the installation vessel shall deploy the export cable into the duct and commence the process of laying the export cable with the assistance of the WROV.

Following the completing of cable laying ROVs shall be deployed from DP2 vessels to trench the export cables. Finally a post installation survey shall be undertaken using a free-flying ROV moving along the export cable route.

7 Operation and Maintenance Overview

Throughout the operation and maintenance phase it is anticipated that major maintenance shall be required in addition to the planned regular maintenance. Major maintenance requirements shall vary from year to year, and therefore it is not currently possible to provide a comprehensive schedule for such activity.

Examples of major maintenance activities which may occur are as follows, noting that this is not an exhaustive list:

- WTG gearbox replacement;
- WTG blade repair/replacement;
- WTG replacement; and
- OSP transformer replacement.

As noted in Section 1.2.3, during periods of major maintenance mandatory 500 m safety zones shall be established around any WTG and OSP structure where work is being undertaken on that structure. Major maintenance activities are likely to involve large vessels which may be RAM (e.g., jack-ups, floating barges and HLVs). Information regarding major maintenance including safety zones shall be promulgated via local Notice to Mariners and radio warnings, and shall be indicated by the presence of a RAM vessel as well as a guard vessel deployed at the Moray East site.

8 Service Operations Vessel

A SOV will be utilised during the construction phase, and certain major maintenance activities. Indicative vessel details are provided in Table 8.1 (noting that these are subject to change given the SOV which will be used has yet to be finalised). The vessel will be equipped with a “walk to work” system, for crew and cargo transfer from the SOV to the wind farm structures.

Table 8.1: SOV Indicative Dimensions

Parameter	Value
Length	Up to 120 m
Breadth	Up to 23 m
Draught	Up to 7m

Given the crew on board, and the “walk to work” system, 500 m safety zones have been granted for any structure where the SOV is stationed and displaying RAM status (during any project phase), as per Section 1.2.

It is noted that an SOV will only trigger a safety zone when the vessel is attached to or on station next to a structure. The safety zones are viewed as a required risk mitigation measure due to the vulnerable nature of the SOVs when they are in this operational condition including the transfer of personnel. During the operations and maintenance phase, it is anticipated that there will be a maximum of one SOV working within the Moray East site at any given time.

9 Lighting and Marking

This section outlines the lighting and marking implemented at the Moray East site during the construction phase. A summary of the lighting and marking during the operation and maintenance phase is also included. Further details can be found in the LMP.

9.1 Construction Phase Marking

Navigational marking for the construction phase has been directed by the Northern Lighthouse Board (NLB) to alert mariners of the navigational safety hazards associated with the construction activities. The cardinal marks do not require mariners to avoid the area but do require them to consider the presence of hazardous activities within their passage. The International Convention for the Safety of Life at Sea (SOLAS) Chapter V as implemented by the Merchant Shipping (Safety of Navigation) Regulation 2002 requires all vessels on all voyages (irrespective of their activity) to have a passage plan in place. This passage plan must anticipate all known navigational hazards.

All required construction phase buoyage was established prior to the commencement of construction works (in agreement with NLB) with required notification submitted. Construction phase buoyage consists of three cardinal marks and six special marks, as shown in Figure 9.1.

Table 9.1 summarises the relevant specifications and details of the installed buoyage, including the as-built coordinates.

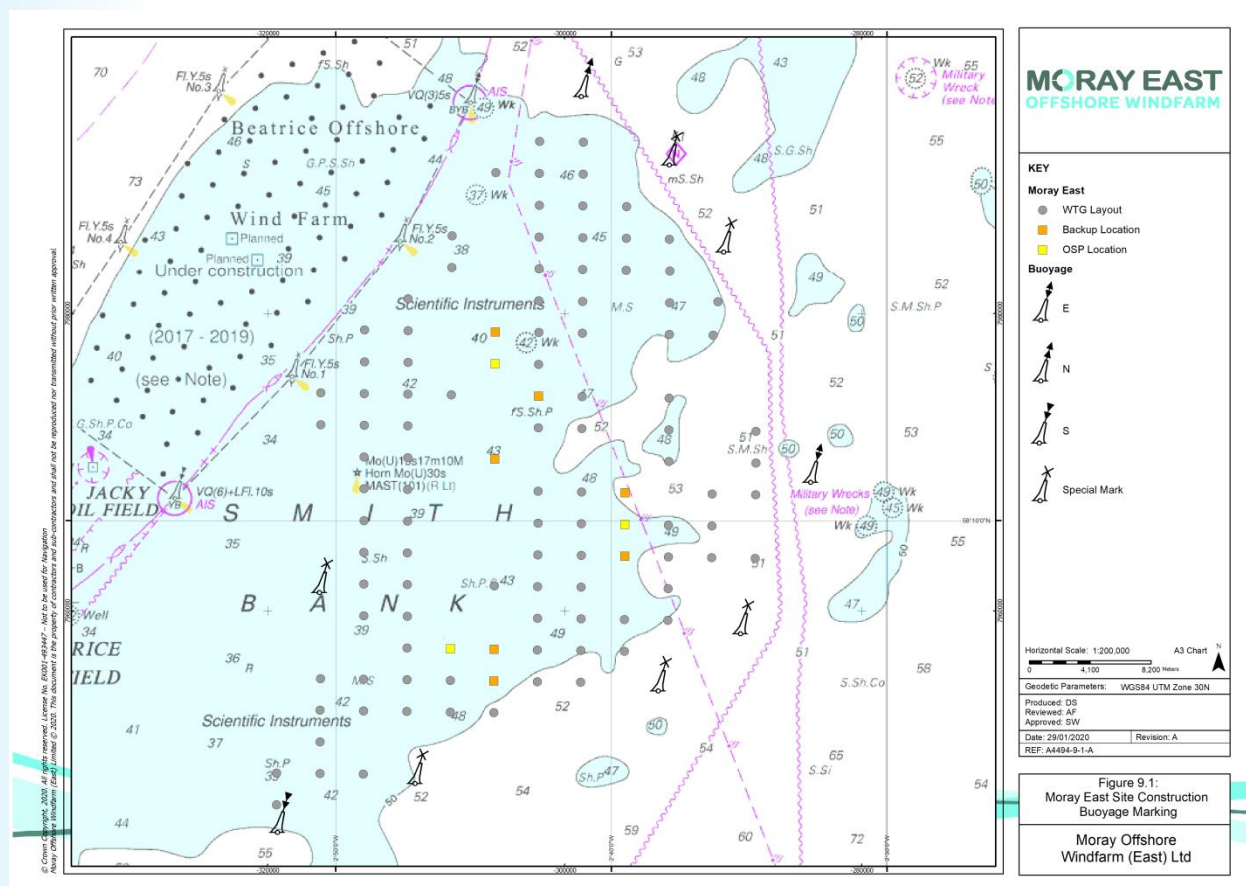


Figure 9.1: Moray East site Construction Buoyage Marking

Table 9.1: Construction Phase Buoyage Summary (Universal Transverse Mercator (UTM) Zone 30N World Geodetic System (WGS) 84

Structure	Specification	Latitude (UTM30 N (WGS 84))	Longitude (UTM30 N (WGS 84))
North Cardinal	<ul style="list-style-type: none"> With a focal plane of at least 3 m and range of 5 nm. Minimum of 3 m in diameter at waterline. Pillar shaped with a north cardinal shaped top mark, exhibiting a Quick (Q) White (W) light character. Category 1 Availability - 99.8% (IALA 2011). Radar Reflector AIS AtoN transmitter (Category 3 Availability - 97.0%). 	58° 18' 6.57" N	2° 41' 4.80" W
East Cardinal	<ul style="list-style-type: none"> With a focal plane of at least 3 m and range of 5 nm. Minimum of 3 m in diameter at waterline. Pillar shaped with an east cardinal shaped top mark, exhibiting a Very (V) Q (3) 5 second (s) W light character. Category 1 Availability - 99.8% (IALA 2011). Radar Reflector. AIS AtoN transmitter (Category 3 Availability - 97.0%) 	58° 10' 44.10" N	2° 32' 45.85" W
South Cardinal	<ul style="list-style-type: none"> With a focal plane of at least 3 m and range of 5 nm. Minimum of 3 m in diameter at waterline. Pillar shaped with a south cardinal shaped top mark, exhibiting a V Q (6) + L Fl 10s W light character. Category 1 Availability - 99.8% (IALA 2011). Radar Reflector AIS AtoN transmitter (Category 3 Availability - 97.0%) 	58° 4' 1.11" N	2° 52' 6.68 W
Six Special Marks	<ul style="list-style-type: none"> With a focal plane of at least 3 m and range of 5 nm. Minimum of 3 m in diameter at waterline. Pillar shaped with a yellow 'X' shaped top mark, exhibiting a Fl Y 5s light character. Category 2 Availability – 99% Radar Reflector 	58° 16' 48.28" N	2° 37' 55.40" W
		58° 15' 8.48" N	2° 35' 57.28" W
		58° 7' 49.70" N	2° 35' 20.63" W
		58° 6' 43.97" N	2° 38' 19.84" W
		58° 4' 57.22" N	2° 47' 9.35" W
		58° 8' 37.09" N	2° 50' 37.07" W

During the construction phase any substructure which is left partially constructed by the installation vessel for any significant time period shall be marked with a construction phase navigational light (Fl Y 2.5s) with 2 nm range visible through 360 degrees (°).

The construction phase buoyage shall remain in place until all operational phase lighting and marking has been inspected and approved by the NLB.

9.2 Operation and Maintenance Phase Lighting and Marking

9.2.1 Marine Navigation

All WTGs which are designated as a Significant Peripheral Structure (SPS) or Intermediate Peripheral Structure (IPS) shall be marked with an appropriate navigational light. Sound (fog) signals shall also be installed on selected SPS. Table 9.2 summarises the navigational lighting and marking to be installed throughout the operation and maintenance phase.

Table 9.2: Operation and Maintenance Phase Lighting and Marking Summary

Structure	WTG	Specification
Significant Peripheral Structure (SPS)	ME-A01 ME-F04 ME-H05 ME-L09 ME-L13 ME-K17 ME-H22 ME-B13 ME-C09 ME-B05	<ul style="list-style-type: none"> Located on a corner or other significant point Each SPS will have 360° visibility, with flashing IALA special mark characteristics (yellow (Y) 5 second flash(FL) – Fl.Y.5second(s)) and with a range of not less than 5 nm IALA Category 1 (> 99.0% availability) All SPS lights shall be synchronized Lights shall be located not less than 6 m and not more than 30 m above HAT
Intermediate Peripheral Structure (IPS)	ME-C02 ME-J07 ME-L11 ME-J19 ME-E19 ME-C16 ME-C07 ST-A01 (Met Mast)	<ul style="list-style-type: none"> Structures on the periphery of the layout other than SPS considered to require additional lighting 360° visibility with a flashing yellow light different to the SPS (2.5 second – Fl.Y.2.5s) and with a range of not less than 2 nm IALA Category 2 (> 99.0% availability) All IPS lights shall be synchronized Lights shall be located not less than 6 m and not more than 30 m above HAT
Sound (Fog) Signals	ME-A01 ME-H05 ME-L09 ME-L13 ME-K17 ME-H22 ME-B13 ME-B05	<ul style="list-style-type: none"> Foghorns on transition piece must face outward into open sea and sound signals must be unimpeded by the tower; IALA Category 3 (at least 97% availability) over a rolling three year period; Each WTG fitted with a sound signal will also have a visibility meter. Sound signals will turn on when visibility is detected to be less than 2 nm. Foghorns can be disabled via SCADA to enable access to WTGs during maintenance.

All jacket foundations shall be painted traffic yellow (RAL 1023 Traffic Yellow) all around up to 18.9 m above HAT. The tower of each WTG shall be painted grey (RAL 7035 Light Grey). Each WTG and OSP shall display its unique ID marking via black letters and numbers on a yellow background visible in all directions, as illustrated in Figure 9.2.



Figure 9.2: Example ID Marking

9.2.2 Aviation

Aviation lighting and marking is not deemed as being directly relevant to this Safety Zone Application, however a summary is provided below for reference.

All periphery structures shall be equipped with two aviation warning lights lit with a synchronised flashing red Morse Code “W” during normal operations. The intensity of these lights shall be 2,000 Candela (Cd) when the visibility is less than 5 kilometres (km) and 200 Cd when the visibility is greater than 5 km, with 360° coverage.

All internal structures will be fitted with a 200 Cd red Search and Rescue (SAR) light in line with Maritime and Coastguard Agency (MCA) requirements. The 2,000 Cd aviation lights on the periphery structures will be capable of being dimmed to 200 Cd at MCA request, and hence will double as SAR lights.

10 Marine Traffic Survey Data

The Moray East NRA, submitted in 2010, presented survey data collected via AIS and Radar over a 90 day period between the 1st May and 31st July 2010. To assess the validity of the vessel traffic data in the NRA, a further 28 days of AIS data recorded between the 4th and 31st March 2018 has been analysed and compared against the 2010 data where appropriate.

It should be considered when viewing the marine traffic analysis that construction of the Development commenced in May 2019, and as such third party traffic may currently be deviating to avoid the buoyed construction area around the Moray East site. Wind farm traffic within the Moray East site not previously reflected in the 2018 data will also now be present.

It should also be considered that at the time that the newer 2018 data was recorded, the neighboring Beatrice project was still under construction. To ensure the focus of the analysis was on non-wind farm related traffic, the vessels associated with the construction of the Beatrice project have been removed from the main analysis. The Beatrice project became operational in May 2019, and on this basis any currently associated traffic is considered to be operations or maintenance based. It is therefore likely that wind farm traffic associated with Beatrice will be at lower levels than when the data was recorded.

Given that Beatrice is now operational, the construction buoys marking the construction site have been removed. However, it should be considered that the buoys were still in place at the time of the marine traffic survey periods.

10.1 Survey Data Overview

The AIS tracks recorded during the NRA survey and Safety Zone Application survey are presented in Figure 10.1 and Figure 10.2 colour-coded by vessel type.

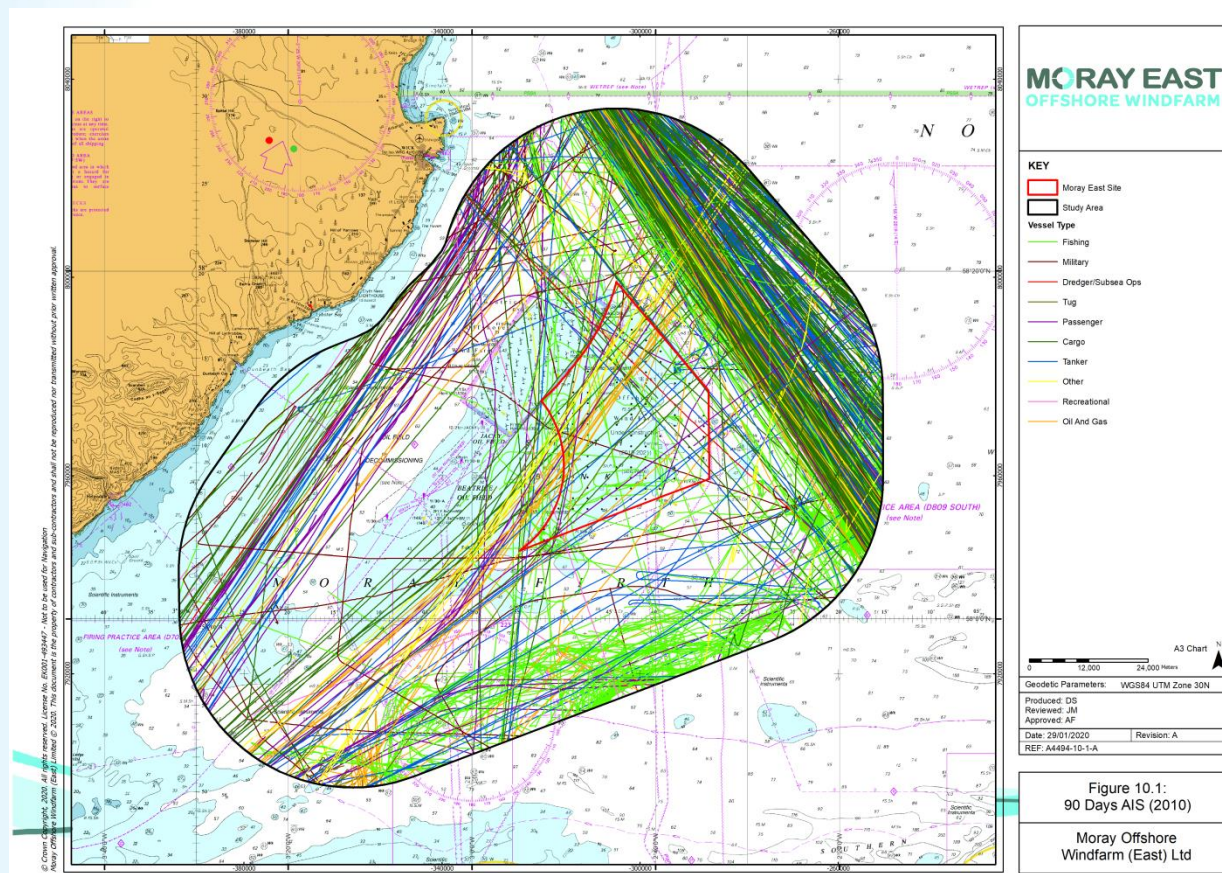


Figure 10.1: 90 Days AIS Data (2010)

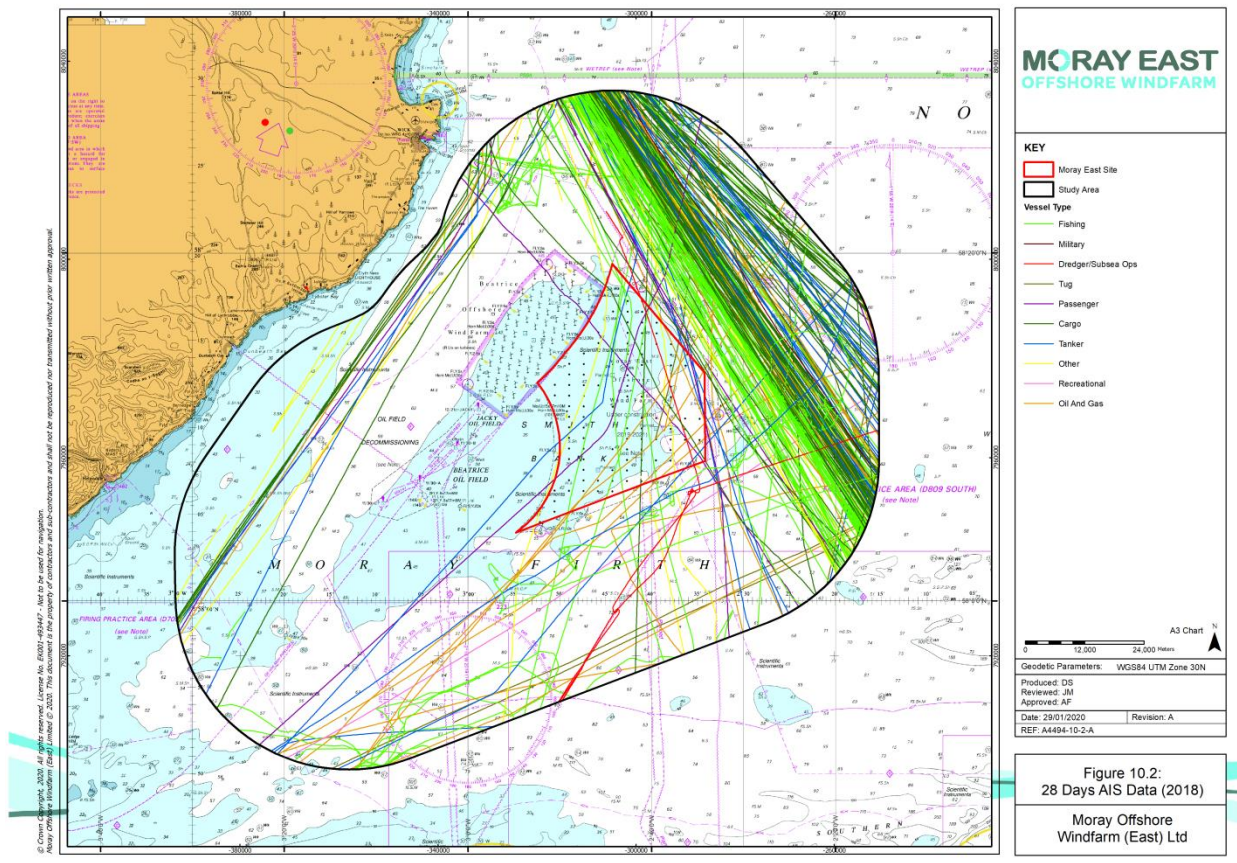


Figure 10.2: 28 Days AIS Data (2018)

It can be seen that in both survey periods the majority of traffic was in transit using the route to the east of the Moray East site. This route comprises mainly cargo vessels, fishing vessels and tankers. Vessels were recorded within the Moray East site during both surveys, noting that at the time that the data was recorded, construction of the Development had not yet commenced (i.e., the Moray East site was not yet marked as a buoyed construction area).

10.2 Data Validation

This subsection compares the original NRA data from 2010 with the updated survey data recorded in 2018 for validation purposes. It is noted that the duration of the 2018 survey period is shorter than the period assessed as part of the NRA (90 days for 2010, and 28 for 2018). For consistency, the analysis of both surveys has been undertaken for vessels recorded within 10 nm of the Development Area; this is an area which contains both the Moray East and Moray West sites. This ensures a consistent approach with the analysis undertaken in the NRA.

10.2.1 Vessel Count

The average number of unique vessels per day was computed for each of the survey periods. Note that the analysis is based upon AIS only (i.e., the Radar data from the 2010 survey has been excluded). This ensured a consistent approach as the 2018 data was AIS only.

Stricter AIS carriage requirements for fishing vessels have been introduced since 2010, and a general upwards trend of smaller vessels not obliged to transmit via AIS but choosing to do so on a voluntary basis has also been observed. However, it should be considered when viewing the assessment that fishing vessels associated with squid in the area are known to not transmit via AIS.

The count assessment showed an average of approximately 11 unique vessels per day was recorded during both the 2010 and 2018 survey periods. On this basis, the difference in the volume of traffic recorded within the study area during the 2010 and 2018 surveys was considered as being insignificant.

10.2.2 Vessel Type

The vessel type distributions recorded during the 2010 and 2018 surveys are compared in Figure 10.3.

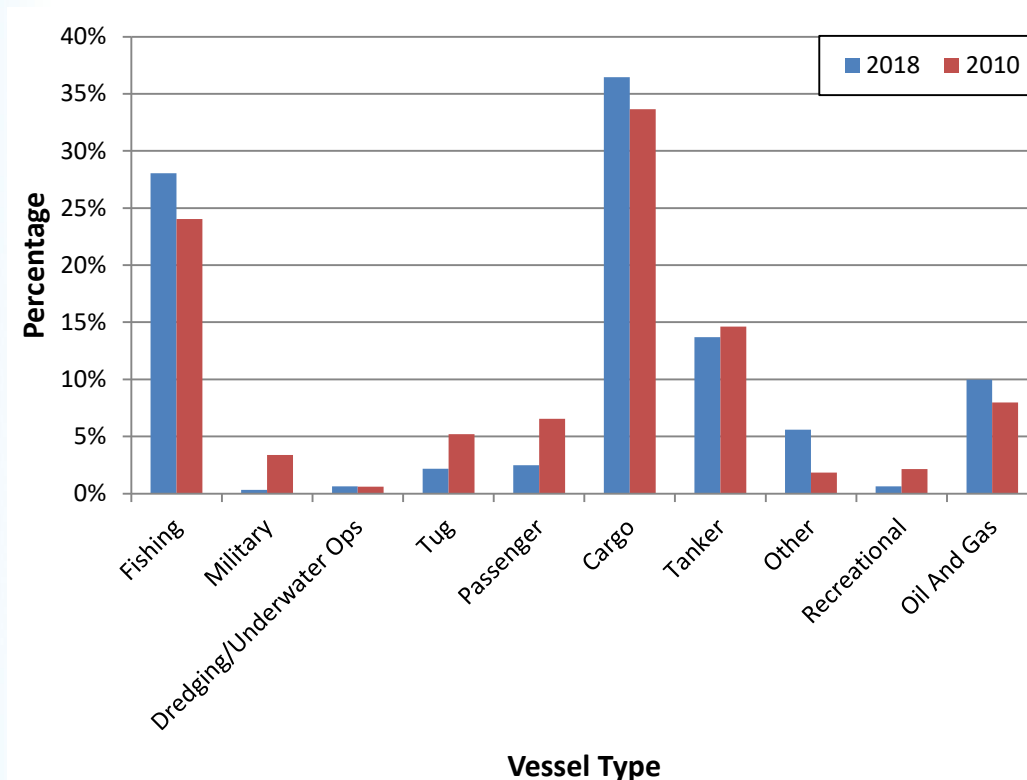


Figure 10.3: Vessel Type Distribution

Overall, there was good correlation between the two datasets, with both showing cargo vessels and fishing vessels to be the most frequent vessel types.

It is noted that a higher proportion of military vessels were recorded during the 2010 survey. These were fishery patrol vessels, which have since reduced in numbers due to the devolution of the monitoring of fishing in Scottish waters which is now the responsibility of Marine Scotland.

Recreational vessels and passenger vessels were also recorded in greater numbers during the 2010 survey when compared to the 2018 data. This difference is likely due to seasonal variation given that the 2010 survey was undertaken across a summer period, whereas the 2018 survey was undertaken in spring.

10.2.3 Intersecting Vessels

Figure 10.4 and Figure 10.5 present the AIS tracks recorded intersecting the Moray East site throughout each survey period, colour-coded by vessel type.

It can be seen that the main route in the 2010 survey was passing through the site in a south westerly direction towards the Inner Moray Firth; the number of vessels recorded using this route in the 2018 survey was significantly reduced due to the ongoing construction works at the Beatrice project (at the time of the traffic survey being undertaken, Beatrice is now operational) which the route passes through. The 2018 survey data indicates a route passing through the east of the Moray East site which may be due to adverse weather conditions or Masters' routeing preferences.

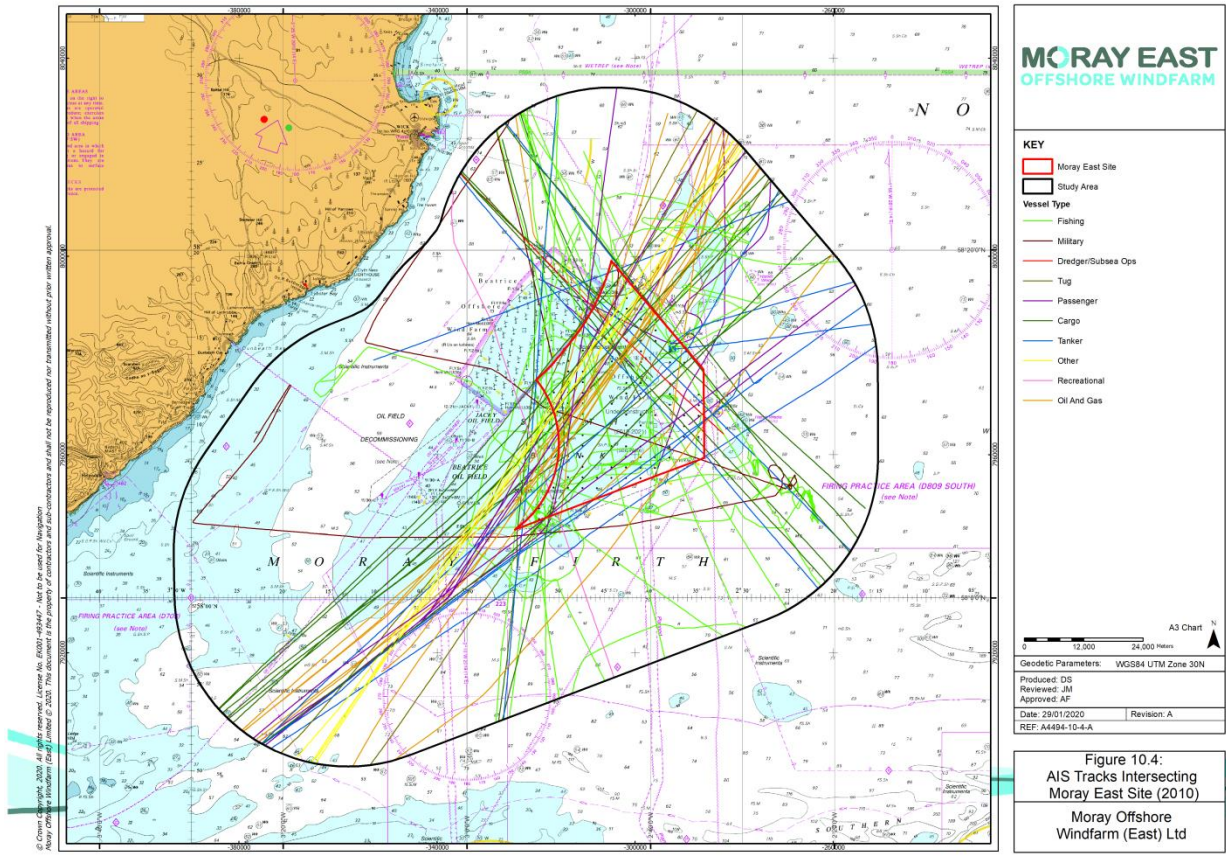


Figure 10.4: AIS Tracks Intersecting Moray East site (2010)

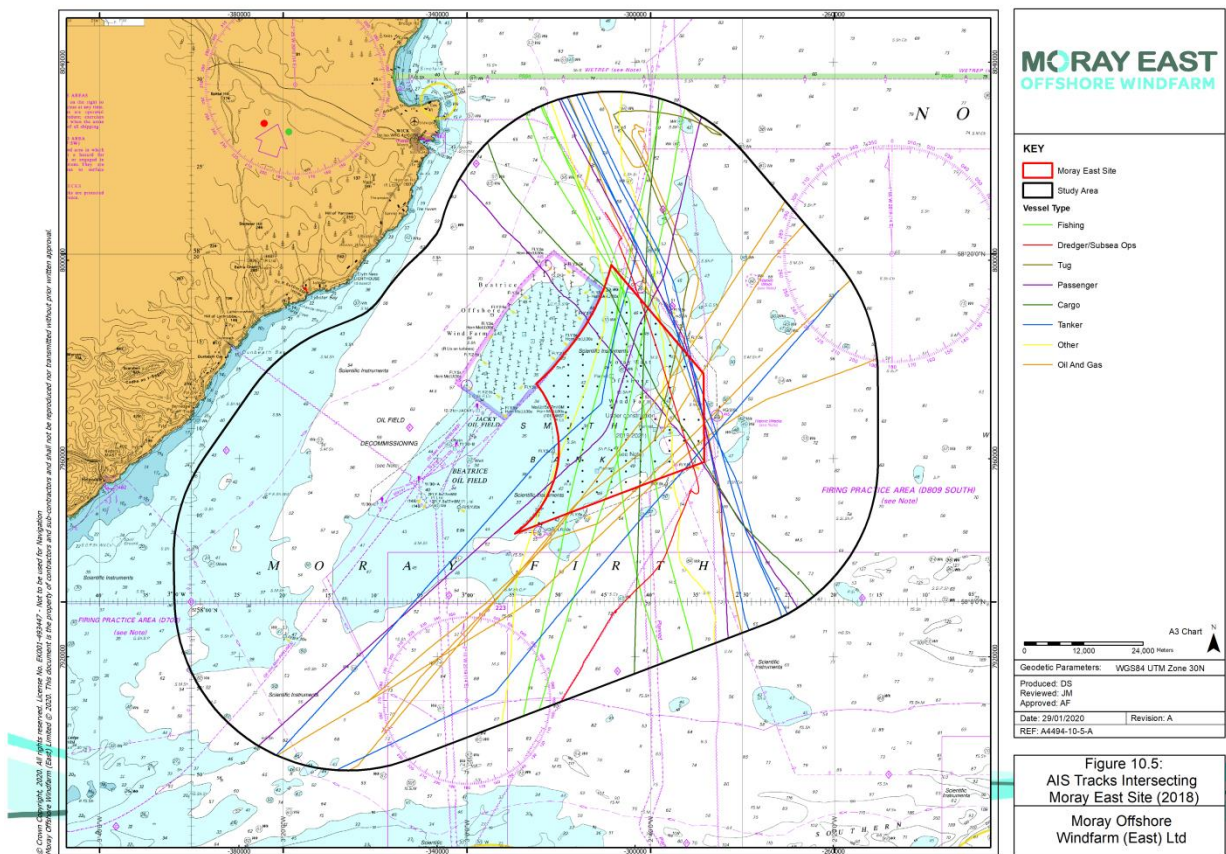


Figure 10.5: AIS Tracks Intersecting Moray East site (2018)

10.2.4 Cargo Vessels

Figure 10.6 and Figure 10.7 present the AIS tracks recorded from cargo vessels throughout the 2010 and 2018 survey periods, respectively.

Cargo vessels accounted for 34% and 36% of the total vessel traffic during the 2010 and 2018 survey periods, respectively. For the 2018 survey, an average of approximately four unique cargo vessels per day was recorded which correlates well with the 2010 survey when approximately four unique cargo vessels per day were also recorded.

It can be seen that in both surveys the majority of cargo vessels which passed through the study area did so to the east of the Moray East site. The 2010 survey also recorded cargo vessels routeing to and from ports within the Inner Moray Firth and passing through the Moray East site. The construction works at the Beatrice project at the time of the 2018 survey resulted in this traffic reducing significantly, with only a small number of cargo vessels passing between the mainland and the Beatrice buoyed construction area. Some of the vessels noted in the 2010 survey period that passed through the Moray East site appear to pass to the north in the 2018 survey data.

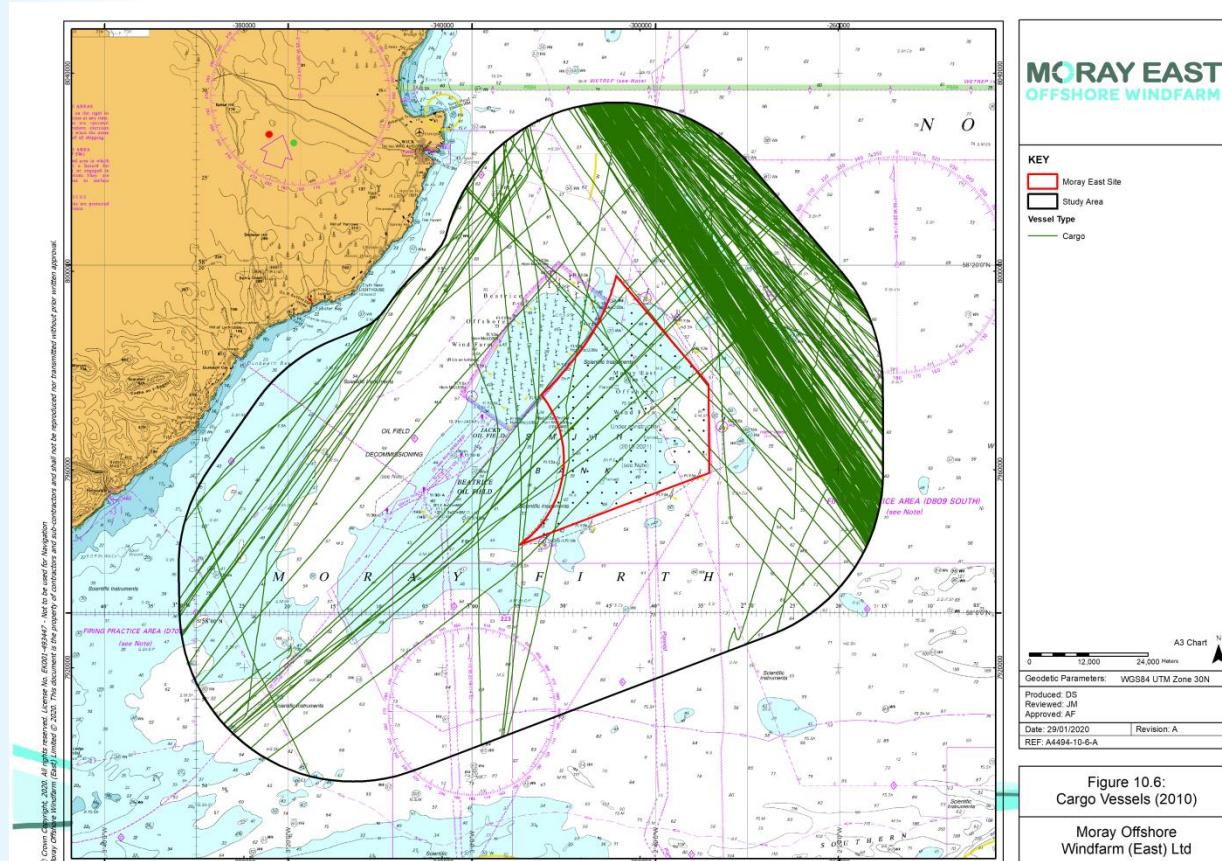


Figure 10.6: Cargo Vessels (2010)

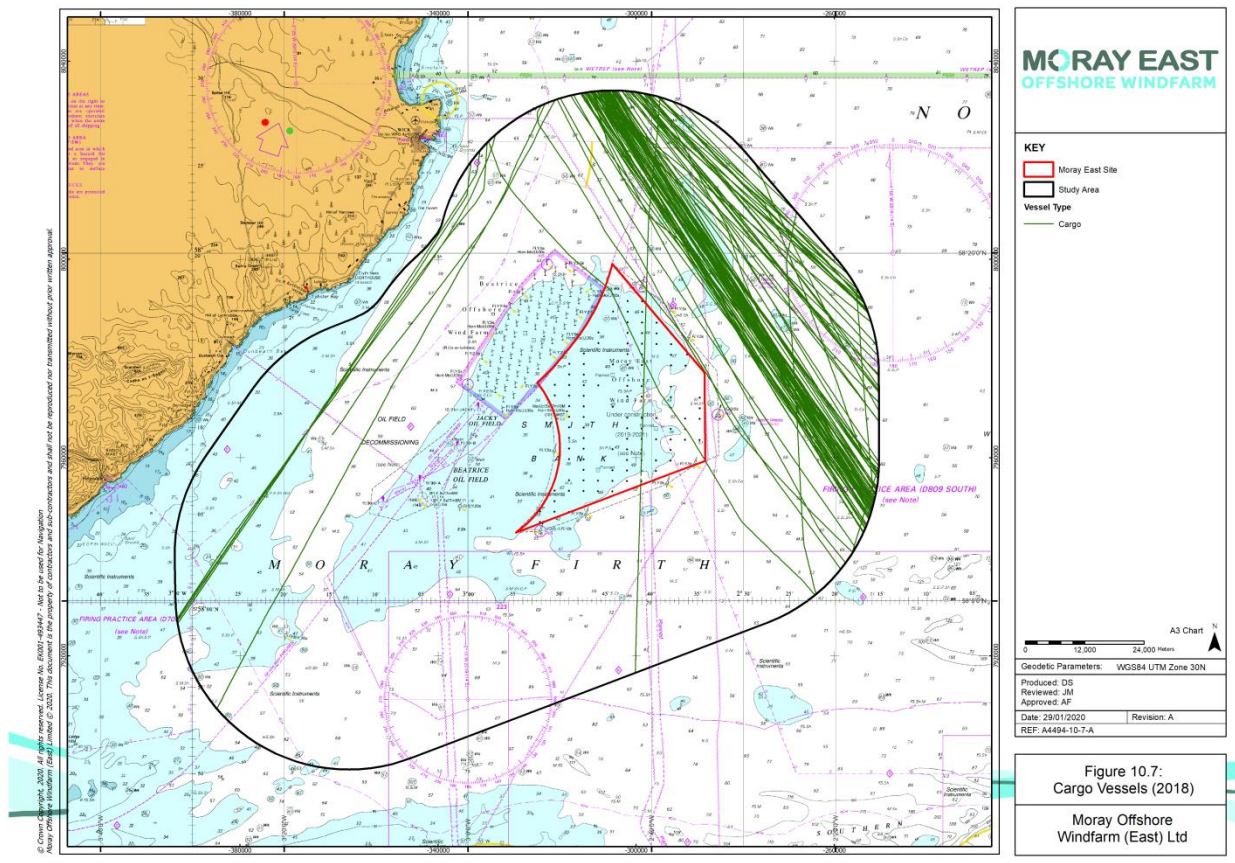


Figure 10.7: Cargo Vessels (2018)

10.2.5 Tankers

Figure 10.8 and Figure 10.9 present the AIS tracks recorded from tankers throughout the two survey periods.

Tankers accounted for 15% of traffic during the 2010 survey, and 14% during the 2018 survey period. For the 2018 survey, an average of one to two unique tankers per day were recorded which correlates well with the 2010 survey when one to two unique tankers per day were also recorded.

Tanker transits to the south of the Moray East site observed within the 2010 survey were not reflected to the same degree within the 2018 survey. This could be attributed to the construction works at the Beatrice project, which may have resulted in tankers choosing an alternative passage. A minor route passing through the eastern extent of the Moray East site is noted in the 2018 survey; this may be attributed to adverse weather conditions or Masters' routing preferences.

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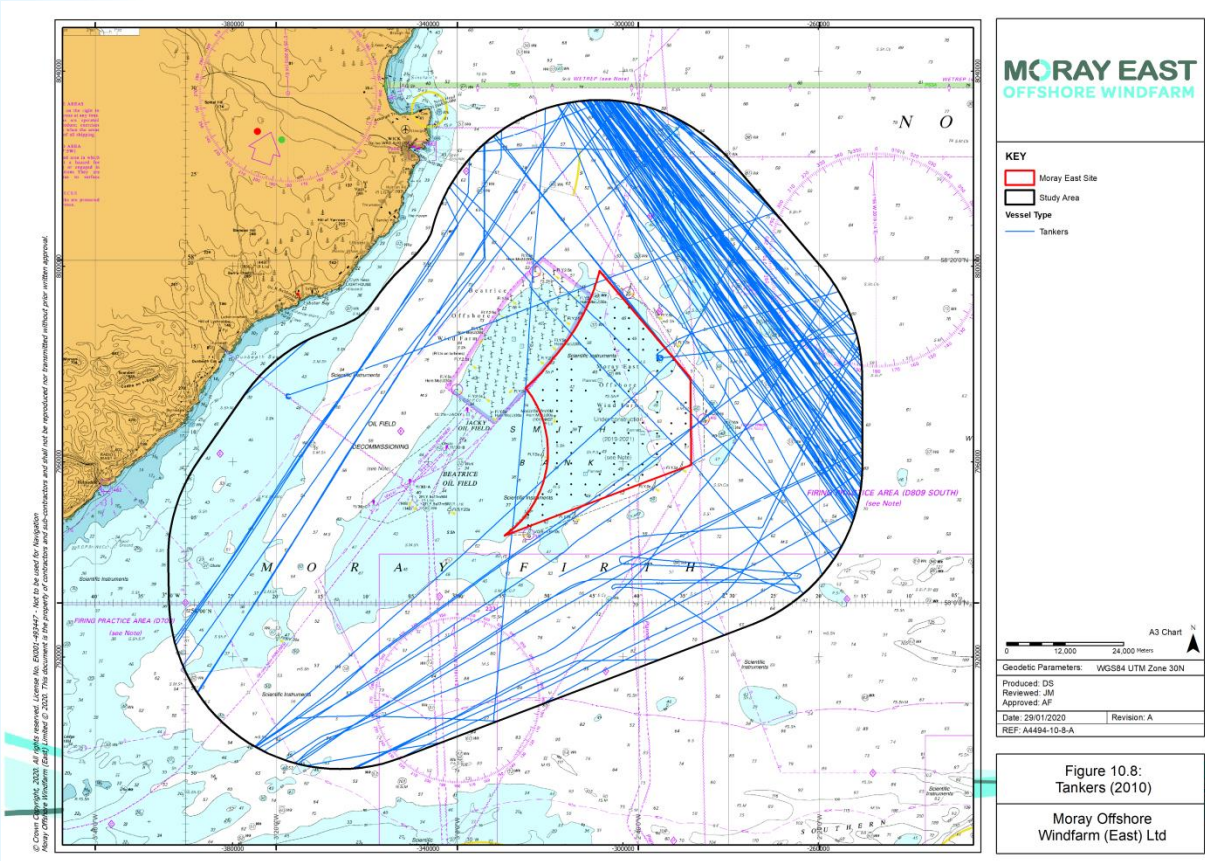


Figure 10.8: Tankers (2010)

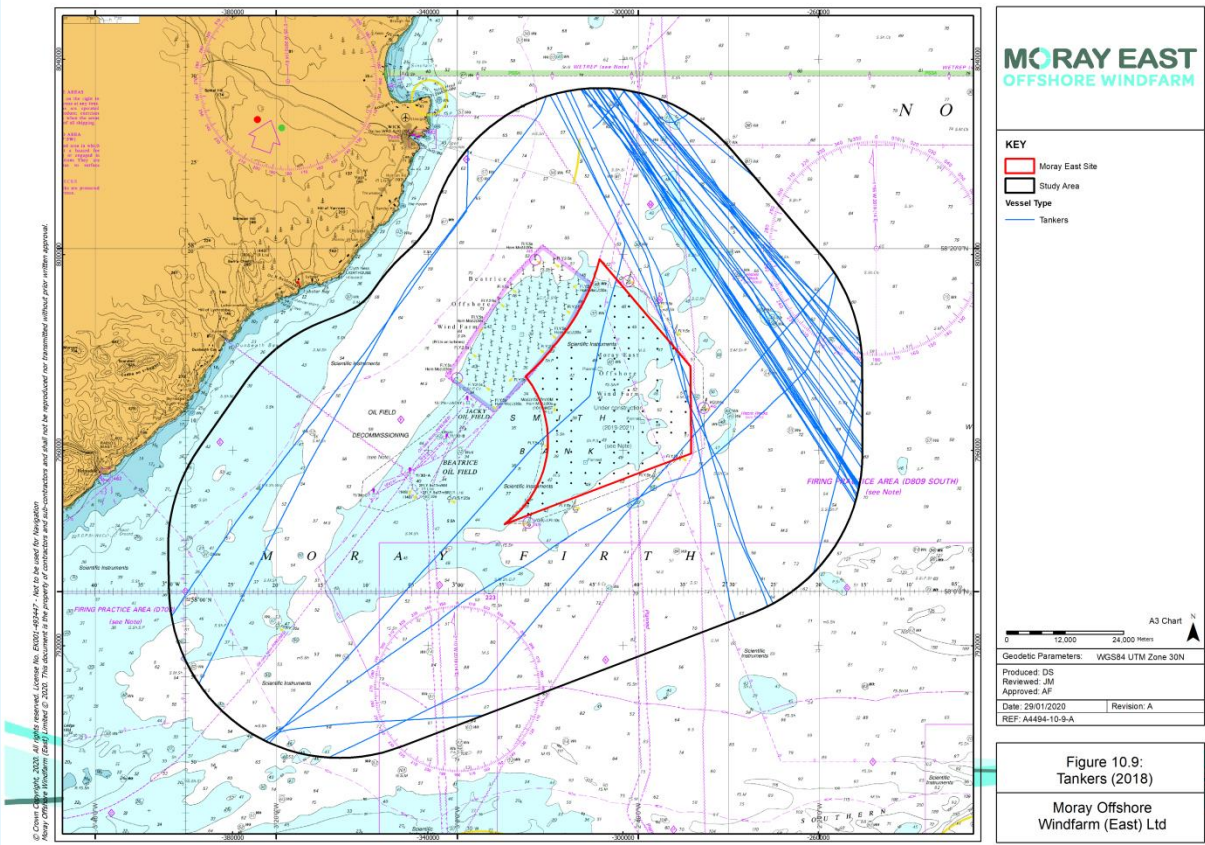


Figure 10.9: Tankers (2018)

10.2.6 Fishing Vessels

Figure 10.10 and Figure 10.11 present the AIS tracks recorded from fishing vessels throughout each survey period.

Fishing vessels accounted for 28% and 24% of the total vessel traffic throughout the 2010 and 2018 surveys, respectively. For the 2018 survey, an average of approximately three unique fishing vessels per day were recorded which correlates well with the 2010 survey when two to three unique fishing vessels per day were recorded.

A decrease in the number of vessels actively fishing within the study area was noted; seasonal variation is considered a large factor in this change, noting that the 2018 data was collected during March, as opposed to the NRA data which covered May to July. The presence of construction works associated with the Beatrice project may also have contributed to the decrease, noting that fishing vessels were recorded within the Beatrice site during 2010, but not in 2018.

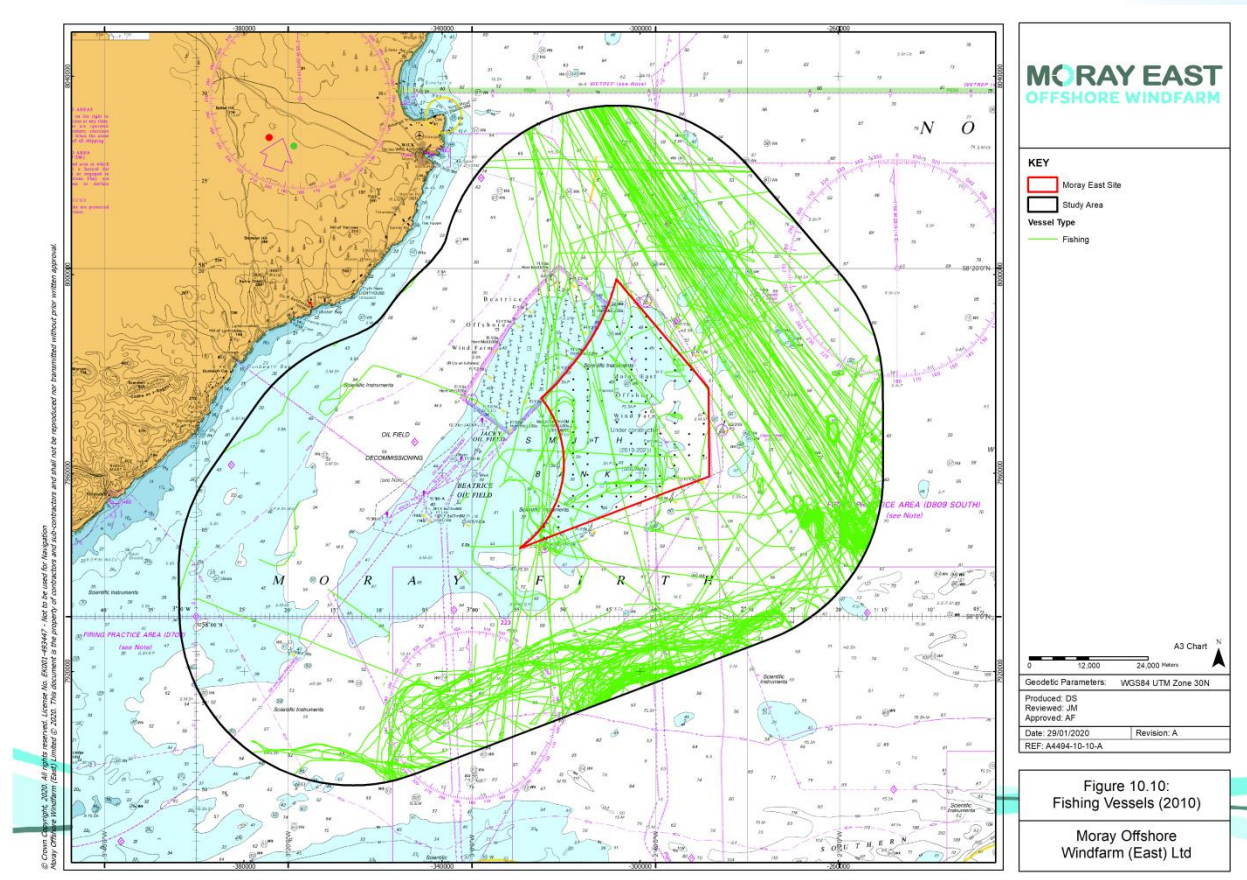


Figure 10.10: Fishing Vessels (2010)

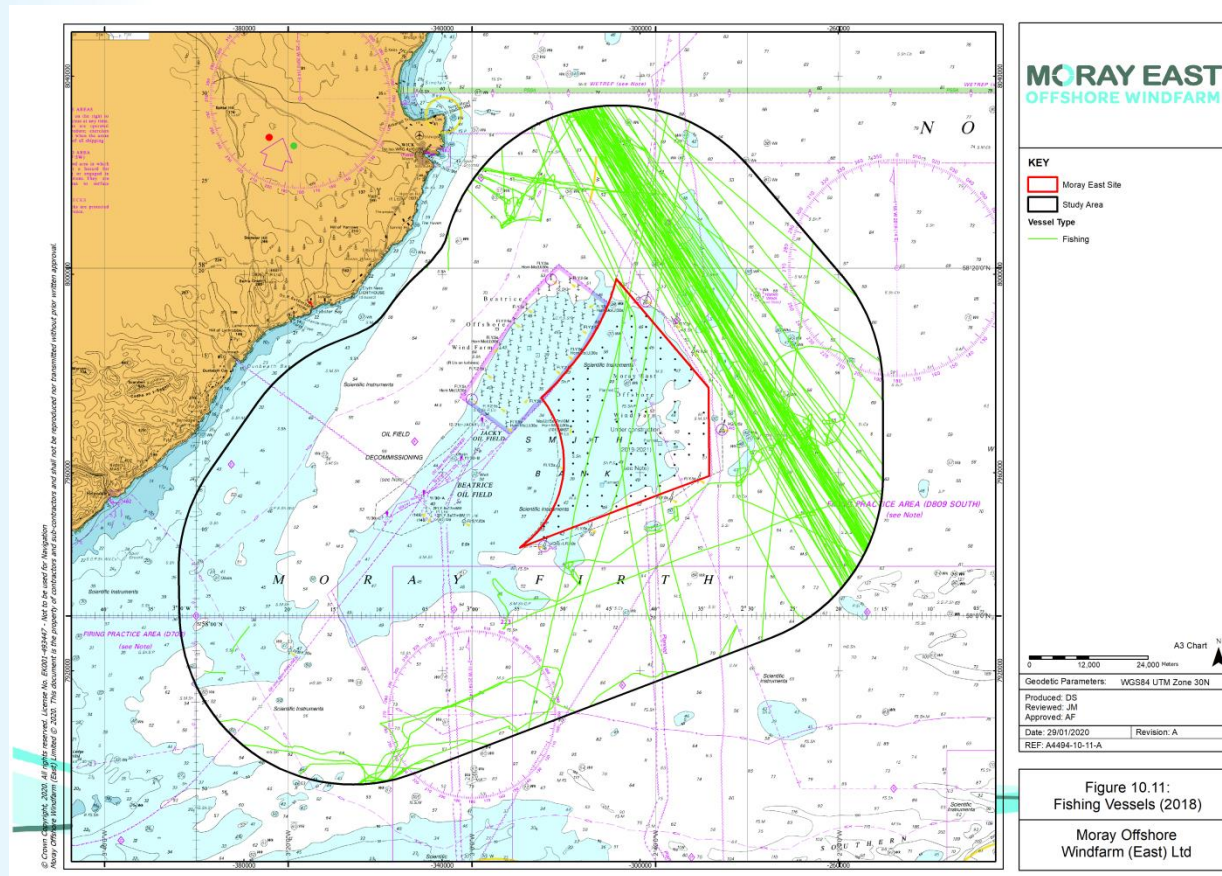


Figure 10.11: Fishing Vessels (2018)

10.2.7 Oil and Gas Support Vessels

Figure 10.12 and Figure 10.13 present the AIS tracks recorded from Oil and Gas support vessels throughout each survey period.

Oil and Gas support vessels accounted for 8% and 10% of the total vessel traffic throughout the 2010 and 2018 surveys, respectively. For the 2018 survey, an average of approximately one unique Oil and Gas support vessel per day was recorded which correlates well with the 2010 survey when approximately one unique Oil and Gas support vessel per day was also recorded.

During both surveys Oil and Gas support vessels passed within the Moray East site, noting that such traffic appears to pass further south in the 2018 survey at a greater distance from the construction works at the Beatrice Project, which were ongoing at the time.

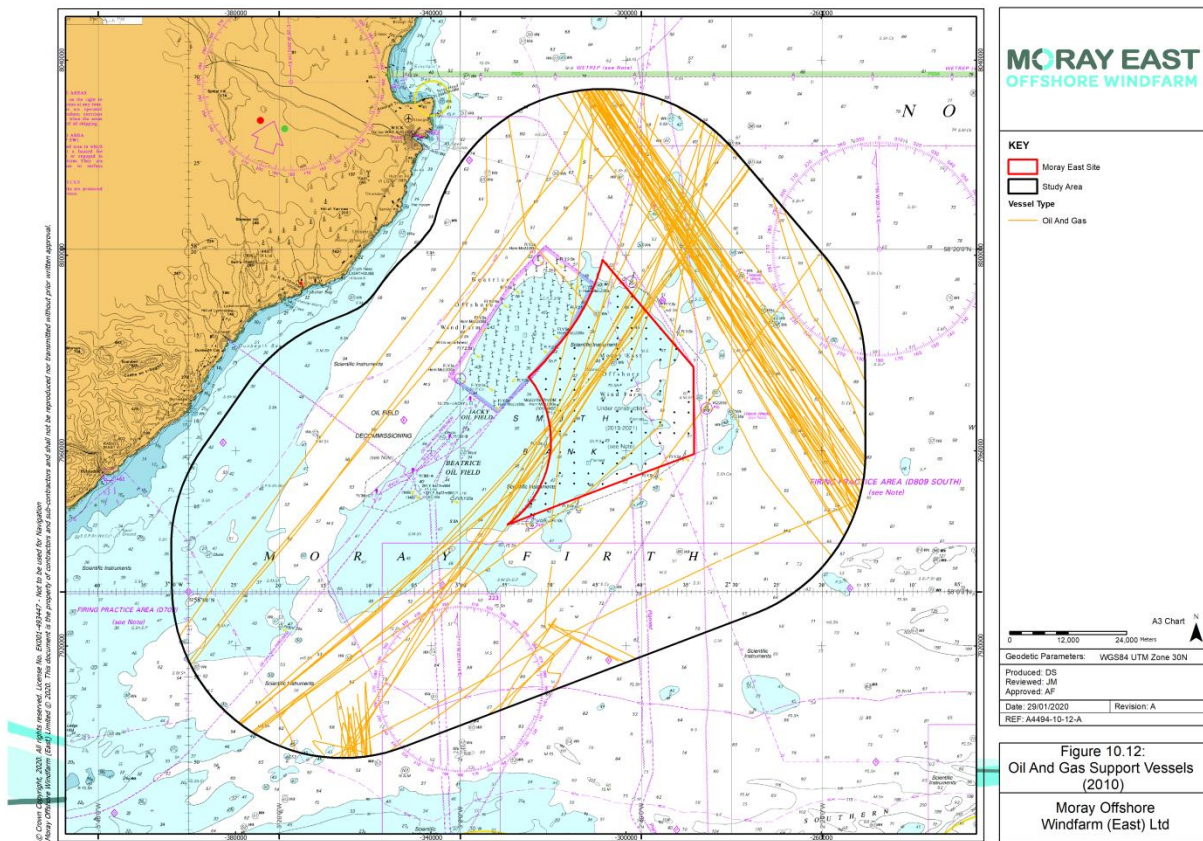


Figure 10.12: Oil and Gas Support Vessels (2010)

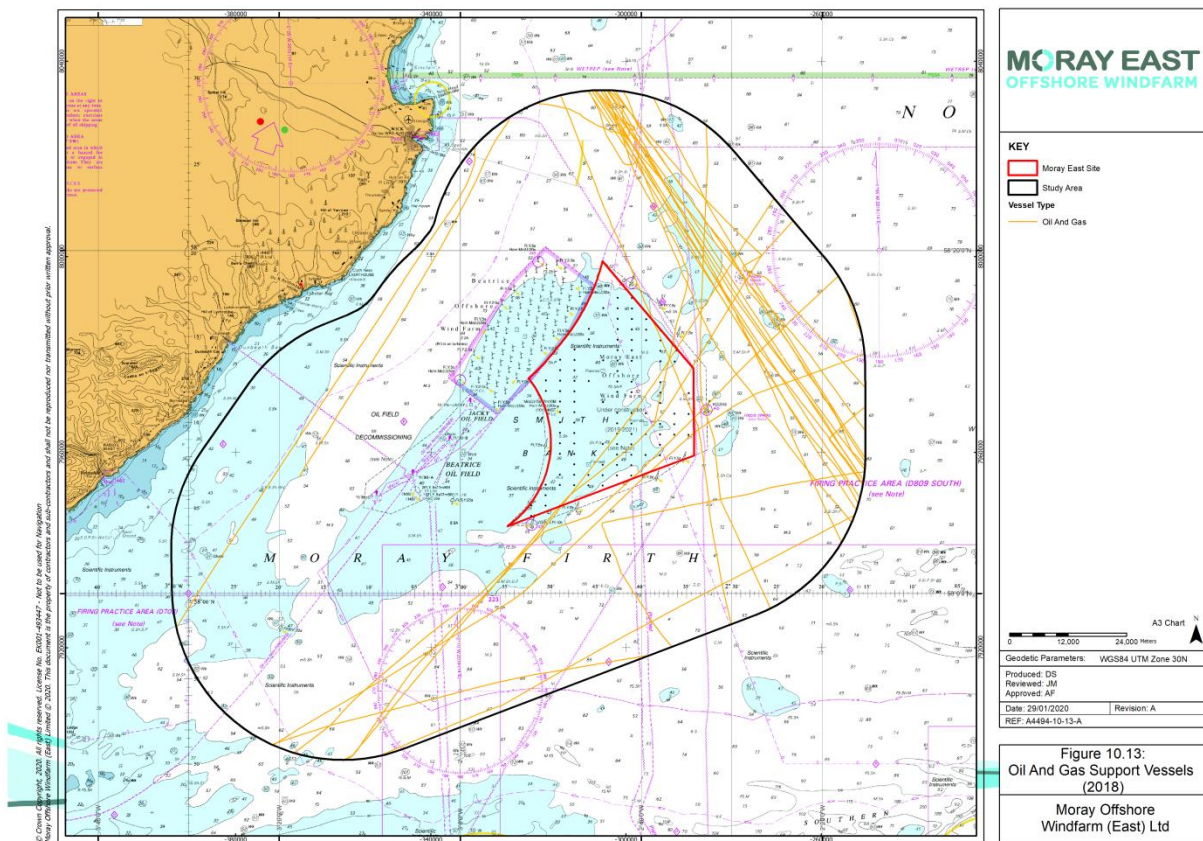


Figure 10.13: Oil and Gas Support Vessels (2018)

10.2.8 Recreational Vessels

A minimal level of recreational vessel activity was recorded within the study area during the 2018 survey whereas there were a greater number of AIS tracks recorded in the 2010 survey. Seasonal variation is considered likely as being the main factor in this change, particularly given that the carriage of AIS on recreational vessels has increased significantly between the two survey periods (which would naturally suggest an increase in recreational vessel activity).

It is noted that recreational vessel activity is likely to be under-represented throughout both surveys since there is no mandatory requirement for recreational vessels to carry AIS.

10.2.9 Anchored Vessels

For the purposes of this validation, a vessel was deemed to be at anchor if it had travelled at a speed of less than one knot for more than 30 minutes. Applying these criteria, no vessels were deemed to be at anchor during the 2018 survey. This may be attributed to the lack of slow moving traffic, as most vessels were in transit, and is in line with the findings of the 2010 survey where only one vessel was deemed to be at anchor throughout the survey period.

11 Risk Assessment Required for Safety Zones

This section considers the potential risks to shipping and navigation identified for the construction and operation and maintenance phases of the Development. This section forms the safety case-based element of the application and summarises potential risks that provide justification for the safety zones being sought.

11.1 Reduction in Collision Risk

Throughout the construction phase of the Development, a number of construction vessels shall be within the buoyed construction area carrying out the installation of foundations, WTGs and inter-array / inter-connector cables. This shall involve the utilisation of a large variety of vessels including barges, tugs, jack-ups, HLVs, SOV and CLVs. The multi-activity nature of the construction phase may result in large numbers of these vessels being on-site simultaneously, including vessels which are RAM. During any particular construction activity at a particular location the likelihood is that only one large vessel shall be present, with support from a number of smaller vessels, however as a worst case up to three large vessels (per structure location) is assumed.

In the case of the operation and maintenance phase, it is anticipated that there shall only be multiple vessels on-site simultaneously during periods of major maintenance. This is likely to involve only one large vessel (potentially an SOV) supported by several smaller vessels. The total number of vessel movements associated with major maintenance activities is anticipated to be significantly lower than that of the construction activities.

As noted in Section 10.2.3, there is a vessel route which passes through the east of the Moray East site. Although any vessel on this route may be at risk of colliding with vessels associated with the works at the Moray East site, it is anticipated that mariners shall alter their passage plans to pass well clear of activities being undertaken, particularly given that the vessels on this route should already have good awareness of dealing with construction activities during the development of Beatrice OWF. This assumption is in line with experience of other constructing or operational offshore wind farms in UK waters whereby marine traffic surveys and AIS data (undertaken by other developers as part of safety zone applications, post consent surveys and Navigation Risk Assessments) show vessels passing consistently clear of construction activities and complying with the guidance issued by the physical presence of cardinal and safety water marks (buoyage). It is noted that the buoyage placement is specifically designed by the General Lighthouse Authority (NLB) to manage the majority of safe vessel transits during the construction phase of any offshore development with safety zones intended to manage internal navigation for those vessels that need to continue to access the construction area.

There is also a main route which passes north east of the site, with cargo vessels, tankers and fishing vessels making up the majority of traffic on this route. There is considered to be a low risk of collision between vessels utilising this route and vessels associated with the works at the Moray East site given the distance at which the majority of routing vessels pass the Moray East site.

The presence of construction and major maintenance vessels as well as partially completed or pre-commissioned wind farm structures should encourage mariners to pass at a safe distance from the activities; however the use of mandatory 500 m safety zones around major maintenance (or 50 m for pre commissioned or partially completed structures) should provide an additional level of protection against a collision incident by ensuring that the sea area where construction is being undertaken is clear. Should a vessel approach or infringe a safety zone they shall be alerted using the standard procedures outlined in Section 13.

Other mitigation measures which shall be implemented to reduce the collision risk during the construction and operation and maintenance phases include:

- Use of buoys to mark the Development during the construction phase;
- Charting of the Moray East site during all phases;

- Provision of a guard vessel(s) and a Marine Coordination Centre (MCC) to monitor activities on Very High Frequency (VHF) and AIS; and
- Promulgation of information (e.g., Notice to Mariners, Kingfisher, port liaison, etc.).

11.2 Reduction in Allision Risk

Throughout the construction phase of the Development, any partially completed or pre commissioned wind farm structures poses an allision risk to passing traffic, particularly earlier in the construction phase when mariners may be less aware of the Development and the associated construction activities. The use of a guard vessel(s) may discourage vessels from approaching the Moray East site; however the use of mandatory 500 m safety zones around partially completed structures (or 50 m for pre commissioned structures) should aid with encouraging mariners to increase their passing distance from the Development.

Moreover, the need to promulgate details of the safety zones to stakeholders in addition to more general information regarding the construction works should further increase awareness of the Development and therefore reduce the overall allision risk.

Again, should a vessel approach or infringe a safety zone they shall be alerted using the standard procedures outlined in Section 13.

Other mitigation measures which shall be implemented to reduce the allision risk during construction and operation and maintenance phases include those listed in Section 11.1 and the lighting of partially completed structures with a construction phase navigational light (FI Y 2.5 s with 2 nm range visible through 360°).

It is noted that the piles put in place for the foundations of the WTGs and OSPs have not reduced water depths by more than 2.5m. Given water depths within the Moray East site are in excess of 30m, no underkeel allision risks are therefore anticipated, and safety zones are therefore not necessary until the jacket installation stage (noting difficulties associated with safety zones around subsea structures). Once jacket installation commences and a vessel is in situ, a 500m safety will be then be activated. Should the vessel move away from the jacket/installation activity a 50m pre commissioning safety zone will apply (see section 1.2.2).

11.3 Reduction in Risk of Interaction with Anchor Spread

During the construction phase, construction vessels may be anchored to the seabed by a spread of anchors which on occasion may extend outwards of 1,000 m from the vessel. Furthermore during the operational and maintenance phase, maintenance vessels may anchor to the seabed whilst undertaking major maintenance. The presence of subsea anchors and anchor chains gives rise to the risk of a passing vessel interacting with them, which could have severe consequences both for passing traffic and construction and maintenance vessels.

The implementation of mandatory 500 m safety zones would ensure that passing traffic stays clear of locations where the risk of interaction with an anchor spread is high, therefore reducing the risk of such interaction occurring. Other mitigation measures would also be required to minimise the level of risk, including the promulgation of information regarding construction and maintenance activities and details of subsea anchor spreads. As per Section 13, a guard vessel will also warn any approaching vessels of the safety zones and ongoing works, including any deployed anchor spreads. This would allow mariners to account for the presence of anchors when passage planning.

11.4 Protecting Moray East Personnel

Throughout the construction phase and during periods of major maintenance of the Development there shall be a significant number of Moray East personnel working in the Moray East site and surrounding area. Given the collision and allision risk (see Section 11.1 and Section 11.2, respectively) there is a risk (albeit a low level and infrequent risk) of loss of life or injury to both Moray East personnel and the crews of passing third party vessels.

As per Section 8, an SOV equipped with a “walk to work” system will be utilised during the construction and operation and maintenance phases. The implementation of 500 m safety zones at any structures that the SOV is attached to or on station next to would provide additional protection to the associated personnel, particularly during the “walk to work” operations.

The implementation of mandatory 500 m safety zones in conjunction with other mitigation measures such as the use of a guard vessel would ensure that vessels are able to passage plan effectively in order to pass the Development at a safe distance, thus minimising the risk to the crew.

11.5 Reduction in Fishing Gear Snagging Risk

Fishing vessels accounted for approximately 24% of traffic recorded within the 2018 survey data, which corresponds to approximately three unique fishing vessels per day (see Section 10). Both anchor spreads of vessels associated with the construction works at the site and pre commissioned wind farm structures pose a risk to fishing vessels snagging their gear, which could have severe consequences including the capsizing of the vessel.

The implementation of mandatory 500 m safety zones during construction or major maintenance activity (or 50 m for pre commissioning structures) in conjunction with other mitigation measures such as the use of a guard vessel and the MCC, a buoyed construction area and charting of the Moray East site would increase awareness of the ongoing works and allow fishermen to passage plan effectively to avoid the Development, therefore reducing the likelihood of a gear snagging incident.

Were a fishing vessel to approach or infringe a safety zone, contact would be made by the monitoring vessel (see Section 13) to identify the area of danger to the fishing vessel, thus reducing the risk of a gear snagging incident.

11.6 Accounting for Inexperienced Mariners

As shown in Section 10, although recreational vessels were infrequent throughout the 2018 survey data, there was recreational activity recorded in the 2010 NRA survey data, and therefore it is considered appropriate to assume that some recreational vessels may pass in proximity to the Development, particularly as the 2018 data was recorded during Spring which may not be reflective of peak recreational traffic levels. Further, there may be non-AIS recreational traffic in the area.

Recreational users may not be experienced mariners or hold many formal marine qualifications. Furthermore, recreational craft generally do not carry as high a standard of navigational equipment as commercial vessels since there is no requirement for them to do so. Therefore, there is a need to mitigate against the potential lack of marine experience and reduced navigational equipment on board recreational vessels.

The implementation of mandatory 500 m safety zones during construction or major maintenance activity (or 50 m for pre commissioning structures) in conjunction with other mitigation measures such as the use of a guard vessel and the MCC, a buoyed construction area and charting of the Moray East site would increase awareness of the ongoing works. This is particularly important for recreational users since inexperienced mariners may not be equipped to effectively assess their distance from a safety zone.

As previously, were a recreational vessel to approach or infringe a safety zone, contact would be made by the monitoring vessel (see Section 13) to identify the area of danger to the recreational vessel.

11.7 Accounting for Unforeseen Risk

Throughout the construction phase and periods of major maintenance of the Development there is potential for a number of events to occur which may result in previously unforeseen risk. Examples of such events include:

- Fire/explosion on board a construction or major maintenance vessel;
- Machinery failure on board a construction or major maintenance vessel;
- Cargo shifting on board a construction or major maintenance vessel;
- Dropped object;
- Structure failure of a wind farm component;
- Unanticipated adverse weather; and
- Accidental interaction with unexploded ordnance or a wreck.

Any of these events could lead to severe consequences to both people and the environment. By implementing mandatory 500 m safety zones during construction or major maintenance activity, and 50 m safety zones around structures pre-commissioning, the risk of a third party vessel becoming involved in any of these events would be reduced. This in turn would reduce the overall severity of consequence for any potential incident.

12 Potential Impacts

This section considers and assesses the potential impacts to shipping and navigation users identified due to the presence of safety zones for the construction phase of the Development (noting that safety zones during periods of major maintenance in the operational phase have already been granted).

12.1 Passing Traffic

As shown in Section 10, vessel traffic on the main route within the region generally pass at a safe distance to the east of the Development and therefore vessels using this route are not anticipated to be significantly impacted by the presence of safety zones within the site. However the 2018 survey data did indicate a less trafficked route which passes through the Moray East site. To avoid infringing upon a safety zone such traffic would have to re-route. However, it should be considered that experience of other wind farm projects indicates that routed commercial vessels will avoid wind farms that are under construction or operational, and as such for Moray East the safety zones in of themselves will not result in additional impact upon passing commercial traffic over that of the buoyed construction area.

Therefore, assuming effective promulgation of information and given the sea room available to the east of the Moray East site for a deviation there are no significant impacts anticipated for passing traffic.

12.2 Fishing Vessels

The Moray Firth area supports a range of fishing activities. Key fisheries active in areas relevant to the site include scallop dredging (including large nomadic scallop dredgers that target grounds in the Moray Firth and across the UK), demersal trawling (principally associated with the seasonal squid fishery (generally from July to September) and more recently creeling for lobster and crab.

The implementation of temporary rolling safety zones may have potential to result in a discrete loss of access to fishing grounds for the above fisheries. It is important to note, however, that these safety zones would be localised and short term and would only apply to small areas (i.e., up to 500m radius each). For reference, ten concurrently active safety zones would account for approximately 3% of the Moray East site as a whole, meaning that the significant majority of the site would not be affected by these safety zones.

It should also be noted that a Fisheries Liaison Officer (FLO) has been appointed by Moray East to facilitate on-going engagement with the fishing industry. In addition, in line with the Moray East's Commercial Fisheries Mitigation Strategy (CFMS) a number of measures are being implemented to ensure that fisheries stakeholders are aware of the activities on site, including relevant information on safety issues and the location and extent of safety zones. These include but are not limited to:

- Weekly Notice of Operations;
- Notice to Mariners;
- Ad-hoc liaison with the fishing industry through the FLO;
- Offshore Fisheries Liaison Officers; and
- Guard vessels.

In the context of this assessment it is important to consider that the 500m construction safety zones applied for are designed to indicate to passing vessels (including fishing vessels) the areas of the Moray East site which should be avoided to ensure their own safety as well as the safety of project and third party vessels.

In addition, it should be noted that for the most part a smaller number of safety zones are expected to be in place at a given time, with 10 safety zones representing the absolute worst case.

12.3 Recreational Vessels

As discussed in Section 10, the level of recreational vessel activity was low, particularly in the 2018 NRA survey data. However there was some recreational traffic recorded in the 2010 survey data, and so this should be considered alongside any non-AIS recreational traffic in the area.

Should any recreational vessel choose to pass through the buoyed construction area, they would be free to transit anywhere outside of an active safety zone. It is anticipated that only ten 500 m safety zones would be active at any given time as a worst case, and this accounts for approximately 3% of the Moray East site in terms of area.

It is important to consider that the 500m construction safety zones are designed to indicate to passing vessels (including recreational vessels) the areas of the Moray East site which should be avoided to ensure the safety of both project and third party vessels. On this basis, vessels should not be passing in proximity to the relevant construction works regardless of the presence of a safety zone.

Therefore, noting the presence of the buoyed construction area as a mitigation measure to indicate that vessels should pass around the Development, and taking into account the small proportion of the site that the safety zones would occupy at any one time, it is not anticipated that the safety zones will have any additional impact upon recreational vessels.

13 Promulgation, Monitoring and Policing

13.1 Promulgation of Information

The deployment of a safety zone shall be promulgated in publications such as (but not limited to) Notice to Mariners, Radio Warnings and Kingfisher bulletins. Moray East will have regular contact with fishing stakeholders through Commercial Fisheries Working Group meetings and the company FLO. Further details can be found in the Navigation Safety Plan (NSP) which is available via the Marine Scotland website. The designated on-site monitoring vessel will also alert passing third party vessels to the presence of any active, or soon to be active safety zones.

13.2 Monitoring

All development vessels will be supplied with safety zone procedures.

Whenever an active safety zone is in place, an on-site vessel will be assigned guard duties, including the responsibility to monitor the safety zones, and the surrounding area, via Radar, AIS, VHF communications and visual observations. This will be either a dedicated guard vessel, or, if no guard vessel is being utilised at the time, another on-site vessel (performing non-critical duties and not restricted in its ability to manoeuvre).

It is assumed that other on-site vessels will also be keeping a watch as required under Rule 5 of COLREGS (IMO, 1972).

Where a third party vessel is observed to be approaching the Moray East site, early contact will be made by the designated on-site vessel to advise the passing vessel of the construction / maintenance work underway, and alert them to the presence of the safety zone(s). Where a third party vessel is observed to enter or come in close proximity to an active safety zone, the designated on-site vessel will make contact using standard marine procedures to inform the vessel it has, or is close to, infringing an active safety zone. The vessel will be warned to increase their passing distance and instructed against entering in the future.

Direct navigational advice will not be given to any third party vessel, with COLREGS (IMO, 1972) remaining as the navigational priority for all vessels.

13.3 Policing

Where feasible, details and actions of any vessels which consistently ignore the warnings issued by the development and are considered to be causing a potential danger to vessels (including their own vessels), personnel or assets within the safety zone areas will be monitored and action (including steps taken) recorded. The safety zones supplement more general regulations that are applicable to all sea users including The Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations 1996 which implement COLREGS (IMO, 1972). These general regulations remain in force and require vessels to take appropriate action when encountering vessels that are RAM as well as the presence of safety zones. Any infringements of the safety zone or unsafe navigational acts (as required under the relevant regulations implementing international conventions) will be reported to the relevant authorities.

It is also acknowledged that assistance measures under Regulation 33 of Safety of Life at Sea (SOLAS) (IMO, 1974) remain valid and a third party vessel is obliged to render assistance to another vessel in trouble even if entry into a safety zone is required.

14 Summary

Within the NRA for the Moray East Offshore Wind Farm the use of safety zones was identified as a mitigation measure required to ensure that the significance level of each shipping and navigation impact was ALARP. This document provides the necessary information to support the following safety zone during the construction phase and during any periods of major maintenance in the operational phase:

- Mandatory “rolling” 500 metres (m) safety zones during the construction phase established around each wind farm structure (both WTGs and OSPs) and / or their foundations whilst construction works are in progress, as indicated by the presence of a construction vessel.
- Mandatory pre commissioning 50 m safety zones during the construction phase established around each wind farm structure (both WTGs and OSPs) and / or their foundations when construction works have been completed but prior to the commissioning of the Development.
- Mandatory 500 m safety zones during the operation and maintenance phase around all major maintenance work being undertaken.

No more than ten 500 m safety zones (worst case) will be active at any given time. Multiple 50 m pre commissioning safety zones will be deployed at any one time (as any structure without a 500 m safety zone would trigger a 50 m safety zone during the construction phase).

Overall, the construction phase is anticipated to take a total of approximately 30 months between May 2019 and October 2021. During the construction phase a large number of vessels, some of which will be RAM, shall be present and undertaking multiple works which overlap in duration. This shall also be the case for periods of major maintenance during the operation and maintenance phase. Throughout both phases, the Development shall be marked and charted as required by NLB.

An analysis of recent AIS data (2018) correlated well with the AIS data which was analysed in the NRA (2010). It can be concluded from the data that the vessel traffic in the region has not changed significantly from the time of the NRA submission (noting that the construction of the Beatrice offshore wind farm has resulted in some third party deviation since the time of the NRA).

Based on the marine traffic assessment, any impacts from the implantation of the safety zones will be minimal. However, the safety zones shall assist with managing various risks in tandem with the other mitigation measures implemented. Benefits include the following:

- Reduction in the likelihood of a collision incident between a construction or maintenance vessel and a third party vessel;
- Reduction in the likelihood of an allision incident between a third party vessel and a wind farm structure;
- Reduction in the risk of an interaction between the anchor spread of a construction or maintenance vessel and a third party vessel;
- Protecting Moray East personnel from passing traffic;
- Reduction in the likelihood of a fishing vessel snagging its gear;
- Accounting for inexperienced mariners; and
- Accounting for unforeseen risks.

Mandatory safety zones shall be implemented alongside a range of other mitigation measures such as a buoyed construction area, charting of the Moray East site, provision of a guard vessel, marine coordination managed from the MCC to monitor and police activities, and promulgation of information. In combination these mitigations shall ensure that the risks associated with the Development are within ALARP parameters.

Safety zones shall be monitored via radar, AIS, VHF communications, and visual observations by a designated on-site vessel at all times, with infringing activity or unsafe navigational activity reported to the relevant authorities as required.

Details of the safety zones will be promulgated in advance of implementation via the standard means (e.g., Notice to Mariners, Kingfisher bulletin) and by the designated on-site monitoring vessel.

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