Safety Zone Statement

MarramWind Offshore Wind Farm

December 2025

MarramWind

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1. Introduction

1.1 Background

1.1.1.1 MarramWind Offshore Wind Farm (hereafter referred to as 'the Project') is wholly owned by ScottishPower Renewables UK Limited (SPR). MarramWind Limited, a subsidiary of SPR, is the Applicant for the Project.

1.1.1.2 The Project is a proposed floating wind farm located in the North Sea, with a grid connection capacity of up to 3 gigawatts (GW). The location of the Project is determined by the Option Area Agreement (OAA), which is the spatial boundary of the Northeast 7 (NE7) Plan Option within which the electricity generating infrastructure will be located. The NE7 Plan Option is proposed to be located in the central North Sea located approximately 40 nautical miles (nm) (75 kilometres (km)) northeast of the Aberdeenshire coast. The OAA covers a total area of around 199 square nautical miles (nm^2) (684 square kilometre (km^2)), with water depths ranging between 87.8 metres (m) and 133.7m.

1.1.1.3 Given the Project is located within the Renewable Energy Zone and is expected to have a generating capacity of in excess of 50 megawatts, the Applicant is submitting an application to Scottish Ministers via the Marine Directorate – Licensing Operations Team (MD-LOT) for consent under Section 36 (s.36) of the Electricity Act 1989, and a marine licence under Section 66 of the Marine and Coastal Access Act 2009, for approval of the construction and operation of the Projects generating station.

1.1.1.4 Further information on the location and design of the of the Project is set out in **Volume 1, Chapter 4: Project Description** of the **Environmental Impact Assessment** (**EIA) Report**.

1.2 Legislative context

1.2.1.1 The process for applying to MD-LOT for a safety zone to be established around an Offshore Renewable Energy Infrastructure (OREI) is set out in Section 95 and Schedule 16 of the Energy Act 2004. The provisions apply to waters in or adjacent to Great Britain between the mean low water mark and the seaward limits of the territorial sea and to waters in the United Kingdom (UK) Renewable Energy Zone.

1.2.1.2 The Electricity (Offshore Generating Stations) (Safety Zones) (Application Procedures and Control of Access) Regulations 2007 (hereafter referred to as '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; Applying for safety zones around offshore renewable energy installations (Department of Energy and Climate Change (DECC), 2011), were also published by the Department for Energy and Climate Change (now the Department for Energy Security and Net Zero (DESNZ)) to assist applicants in the process of making an application for safety zones. As of 1 April 2017, the application process for safety zones devolved to MD-LOT. Scottish Ministers have the power to issue a notice declaring a safety zone around or adjacent to surface piercing structures, with initial applications for safety zones being made to MD-LOT.

1.2.1.3 The provision for safety zones applies to all surface piercing structures, including those which have already been consented and encompasses 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.

1.2.1.4 The safety zone provision does not cover non-surface piercing infrastructure such as export cables, array cables, subsea distribution centres (SDC), or subsea substations located outside an approved safety zone. This infrastructure may be subject to advisory safe passing distances in lieu of statutory safety zones.

1.3 Objectives

1.3.1.1 This **Safety Zone Statement** sets out the Applicant's current intentions relating to the requirements for safety zones at the Project during the construction and operation and maintenance (O&M) stages and correspondingly the basis of an application that will be made under the provisions of the Energy Act 2004 and the 2007 Regulations (hereafter referred to as 'the Application').

1.3.1.2 The Application will provide all of the information required by Regulation 3 of the 2007 Regulations including the required descriptions of the Project, nature of the safety zones sought and means by which the safety zones would be monitored (further detail provided in **Section 3.2**). In accordance with Section 95 of the Energy Act 2004, the Application will be made to MD-LOT who will then make a recommendation to the Scottish Ministers. The Application will be made when the final number and precise location of the surface piercing structures have been determined.

1.3.1.3 This **Safety Zone Statement** does not currently address in detail any safety zone requirements relating to the decommissioning stage. If, following consultation with MD-LOT and other relevant bodies such as the Maritime and Coastguard Agency (MCA) and Northern Lighthouse Board (NLB), 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.

1.3.1.4 This **Safety Zone Statement** addresses the following:

- **Section 2:** Need for safety zones for the Project.
- **Section 3:** Outline of the intended Application.

2. The Need for Safety Zones for the Project

2.1.1.1 The Applicant's intention is to make an application for safety zones around the WTGs and offshore substations during the construction and O&M stages in the event that consent is granted for the Project. The currently anticipated need for safety zones at the Project OAA is set out in **Volume 1, Chapter 15: Shipping and Navigation** of the **EIA Report**, which accompanies the application for a marine licence and s.36 consent. The need for safety zones is supplemented by the detailed marine Navigational Risk Assessment (NRA). This assessment is set out in **Volume 3, Appendix 15.1: Navigational Risk Assessment** of the **EIA Report**.

2.1.1.2 For the construction stage, 500m safety zones have been considered by the NRA as being an essential mitigation. Specifically, during the construction stage, 500m safety zones will be established at locations in which construction activity is currently taking place and evidenced by the presence of a construction vessel. A 50m safety zone around each surface piercing structures where construction works are complete but prior to the overall wind farm being commissioned and operational may also be necessary.

2.1.1.3 For normal operations during the O&M stage, the NRA does not currently identify any specific need for safety zones to be established around the surface piercing structures. However, an application would be made for safety zones of up to 500m to be employed where major maintenance is underway on any surface piercing structures during the O&M stage.

2.1.1.4 With regard to the decommissioning stage of the Project, as noted above, it is anticipated that the Application would not include any specific provisions for the decommissioning stage. Rather it is expected that the need for safety zones at that stage would be subject to appropriate risk assessment and consultation with the statutory authorities. A separate application would be made prior to decommissioning where necessary. It is noted that the anticipated provisions for safety zones for the Project align with the standard definitions set out in the 2007 Regulations.

2.1.1.5 In summary, the Applicant anticipates that an application for safety zones would be made to MD-LOT incorporating some or all of the following provisions, noting that safety zones will move with the floating units:

- Construction stage – rolling 500m safety zones around active construction works and evidenced by the presence of a construction vessel; and 50m safety zones around partially or fully completed structures prior to the overall wind farm commissioning.
- O&M stage – a 500m safety zone around the location of major maintenance works.
- Decommissioning stage – no safety zones currently proposed; a separate application would be made prior to decommissioning where considered necessary.

2.1.1.6 The final scope and form of the safety zone application will be decided following completion of the detailed design of the Project but prior to the start of construction works; currently the earliest date an application would be submitted would be one year prior to offshore construction commencing. The phased build out is intended to be continuous in nature and follow a systematic approach over the course of the construction stage and so construction works and associated requirements for safety zones would commence at different area of the OAA at different times. The final safety zone application would be developed through further risk assessment and in consultation with relevant statutory authorities, and in line with the 2007 Regulations and accompanying guidance notes.

3. Outline of Intended Application

3.1 Scope of the application for marine licence and section 36 consent

3.1.1.1 The following subsections outline the anticipated works across the construction and O&M stages of the Project. Further detail is provided in **Volume 1, Chapter 4: Project Description** of the **EIA Report**.

3.1.2 Construction

3.1.2.1 The application for the Project seeks consent for the following offshore construction works, as detailed in **Volume 1, Chapter 4: Project Description** of the **EIA Report**:

- pre-construction surveys and seabed preparation activities;
- anchor and mooring line installation;
- WTG floating unit and wind turbine preparatory works;
- floating wind turbine towing to site;
- array cable and SDC installation;
- offshore platform foundation installation and;
- offshore platform topside installation;
- offshore subsea substations;
- export cable installation; and
- WTG commissioning.

3.1.2.2 These works are described sequentially above, although given the scale of the Project it is likely that some works will be undertaken in parallel in practice.

3.1.3 Operation and maintenance

WTGs

3.1.3.1 The following O&M activities are expected to occur in relation to the floating WTGs:

- replacement of consumable items (for example lubricants);
- routine inspections;
- blade repairs and / or replacements;
- gear box replacements;
- other minor repairs;
- painting or other protective coatings; and
- visual inspections.

3.1.3.2 Regular maintenance activities will primarily be carried out offshore with the WTG in situ. For major component replacement (MCR), it may be necessary to tow the WTG / WTG

floating unit assembly to port, particularly in the early years of floating wind farm operation. Emerging technologies are being considered and developed that would remove the need for tow to port and allow MCR to be undertaken offshore.

Floating units

3.1.3.3 The following O&M activities are expected to occur in relation to the floating units:

- routine inspections;
- repairs or replacements of navigational equipment and other ancillary equipment including condition monitoring equipment;
- removal of marine debris (for example lost fishing gear);
- application of paint or other protective coatings and corrosion protection measures;
- modification or replacement of ancillary structures such as access ladders and boat landings;
- replacement or repair of mooring line components and hardware such as rope, links, chain buoyancy aids and / or clump weights where necessary; and
- replacement or repair of array cables.

Array cables

3.1.3.4 The following O&M activities are expected to occur in relation to the array cables:

- routine inspections;
- geophysical surveys;
- cable repair by recovering the cable from its trench or water column and making the necessary repairs.
- reburial of sections of cable that have become exposed;
- ancillary equipment repair or replacement; and
- replacement of cable protection over sections of the cable identified as in need of protection.

Subsea distribution centres and subsea substations

3.1.3.5 The following O&M activities are expected to occur in relation to SDC and subsea substations:

- routine inspection by remotely operated vehicle (ROV);
- geophysical surveys;
- removal of marine growth;
- replacement of corrosion protection anodes;
- replacement of equipment / connections;
- cable repair or replacement; and
- replacement of scour protection (if fitted).

Offshore platforms

Offshore platform topsides

3.1.3.6 The following O&M activities are expected to occur in relation to the offshore substation topsides:

- routine inspections;
- removal of avian guano;
- replacement of consumables and electrical transmission components; and
- painting and other coatings.

Offshore substation and reactive compensation platform (RCP) jacket foundations

3.1.3.7 The following O&M activities are expected to occur in relation to the offshore substation and RCP jacket foundations:

- routine inspections;
- geophysical surveys;
- repairs and replacements of navigational equipment and other ancillary equipment including condition monitoring equipment;
- removal of marine growth;
- replacement of corrosion protection anodes;
- application of painting or other protective coatings;
- replacement of access ladders and boat landings;
- modifications to or replacement of J and I-tubes; and
- replacement of scour protection.

3.2 Scope of the safety zone application

3.2.1.1 A formal safety zone application is normally expected to be made following award of the main development consent (in this case the approval of a marine licence and consent under s.36 by the Scottish Ministers). The DECC guidance on safety zone applications (DECC, 2011) notes that, following award of consent, a developer will normally have taken decisions on a range of important technical issues such as foundation type and the locations of the installations which will make up an array, thereby ensuring that decisions about safety zones, and particularly how a safety zone notice should be drawn up, can be taken on the basis of firm and up to date information. The application is to be made to MD-LOT with notice of application served to the Navigation Safety Branch of the MCA, NLB and other relevant stakeholders.

3.2.1.2 The approach to safety zone applications for the Project has been discussed and agreed with key stakeholders including the MCA, NLB and MD-LOT through engagement in 2025.

3.2.1.3 In the case of the Project, the safety zone application would be made following completion of the detailed design work but prior to the start of the construction works. The earliest date an application would be submitted is anticipated to be one year prior to offshore construction, subject to progression of the design and procurement process.

3.2.1.4 In relation to the information requirements of an application, Regulation 3 of the 2007 Regulations sets out what should be included within a written application for safety zones in respect of an offshore generating station. The requirements are set out as follows:

- A map showing:
  - the place where the relevant renewable energy installation is to be, or is being, constructed, extended, operated or decommissioned; and
  - the waters in relation to which any declaration applied for will establish a safety zone.
- 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 electric line used (or proposed to be used) for the conveyance of electricity to or from the installation; and
  - any connection to such an electric line.
- 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 surface piercing structure, the proposed or existing distance between such installations.
- 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 standard 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.
- 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 shipping traffic survey for the waters comprising the zone.
- 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 surface piercing structure is to be, or is being, constructed, extended, operated or decommissioned, as the case may be.

3.2.1.5 The Application for the Project will contain the information required by Regulation 3 of the 2007 Regulations as set out above. An application will be made for the standard safety zones, which may comprise the following:

- a 500m radius around individual surface piercing structures whilst work is being performed as indicated by the presence of construction vessels;
- a 50m radius around individual surface piercing structures prior to commissioning of the wind farm, whether they be complete or incomplete; and
- a 500m radius around all major maintenance works being undertaken around the WTGs.

3.2.1.6 Regulation 4 of the 2007 Regulations also require an application to be publicised by notice in a prescribed manner and copies of the notice must be sent to the Harbour Masters of ports whose users are, in the opinion of the Applicant, likely to be affected by the Application; and to the MCA Headquarters plus the Coastguard Maritime Rescue Coordination Centres responsible for operations in the waters in which the safety zone is proposed or located.

3.2.1.7 In addition, the guidelines on the 2007 Regulations advise that applicants undertake early consultation with 'interested parties' on their intention to make an application for safety zones. MD-LOT will consult with a range of organisations upon receipt of an application.

3.2.1.8 The Applicant will take note of the prescribed publicity and notification requirements in preparing the Application. The Applicant has already undertaken early consultation in preparing the current application for a marine licence and s.36 consent, consulting with vessel operators, fishers and recreational interest groups as well as statutory agencies such as the MCA and NLB. Once the final design details of the Project are available, the Applicant will conduct further consultation with regard to safety zones if required, prior to making an application to MD-LOT.

3.3 Next steps

3.3.1.1 Following consent application submission and assuming that s.36 and marine licence consents are granted, the next steps will be for the Applicant to undertake the necessary safety zone applications based on the final Project design and to undertake the required consultations to inform the process.

4. References

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5. Glossary of Terms and Abbreviations

5.1 Abbreviations

Acronym	Definition
DESNZ	Department for Energy Security and Net Zero
EIA	Environmental Impact Assessment
km	kilometre
km²	square kilometre
m	metre
MCA	Maritime and Coastguard Agency
MCR	Major Component Replacement
MD-LOT	Marine Directorate – Licensing Operations Team
NLB	Northern Lighthouse Board
nm	nautical mile
nm²	square nautical mile
NRA	Navigational Risk Assessment
O&M	Operation and Maintenance
OAA	Option Agreement Area
OREI	Offshore Renewable Energy Installation
ROV	Remotely operated vehicle
s.36	Section 36 of the Electricity Act 1989

Acronym	Definition
SDC	Subsea Distribution Centre
UK	United Kingdom
WTG	Wind Turbine Generator

5.2 Glossary of terms

Term	Definition
Navigational Risk Assessment	A document which assesses the hazards to Shipping and Navigation of a proposed OREI based upon Formal Safety Assessment.
Offshore Renewable Energy Installation	As defined by Marine Guidance Note 654 (Merchant and Fishing) Safety of Navigation: OREIs – Guidance on UK Navigational Practice, Safety and Emergency Response (MCA, 2021). For the purposes of this report and in keeping with the consistency of the EIA, OREI can mean offshore wind turbines and the associated electrical infrastructure such as offshore substations.
Safety Zone	A statutory marine zone demarcated for the purposes of safety around a possibly hazardous installation or works/construction area. Where these are referred to as “rolling”, this indicates that the safety zone is dynamic, such that the exclusion area moves in line with active work zones as opposed to holding a fixed location.

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