Intended for Viking Energy Wind Farm LLP

Date March 2021

Project Number **1620009158**

VIKING ENERGY WIND FARM PLANNING MONITORING OFFICER AUDIT REPORT 004: 27TH JANUARY TO 25TH FEBRUARY 2021



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1. AUDIT DETAILS

1.1 Audit Details

Audit Number	PMO 004				
Location	Kergord				
	Sandwater Road				
	Mid Kames Ridge				
	Main Construction Compound				
	Nesting				
	Locations were accessed by SSE Environmental Advisor and SIC Planning Enforcement Officer. Live video calls were undertaken at each location to allow the PMO to observe the active work areas and work areas that had been progressed since the last audit.				
Weather Conditions	Rain showers, windy, cold, (7°C).				
Audit Date	24 th to 25 th February 2021				
Audit Period	27 th January to 25 th February 2021				
Audit Owner	Ramboll UK Ltd				
Additional Comments	The PMO Audit was undertaken remotely as a result of revised guidance issued by the Scottish Government on 5 th January 2021 whereby mainland Scotland moved from COVID Protection Level 4 to a temporary lockdown.				
	Shetland Islands Council (SIC) agreed to audits taking place remotely in the interim, comprising live video links with attendance by SICs Planning Enforcement Officer, as an alternative to a site visit audit on 22nd January 2021.				
	The PMO provided an agenda to representatives of SSE and SIC in advance of the audit.				

1.2 Distribution

Position	Action
Ramboll Project Director Planning Monitoring Officer	For information
SSE Renewables Development Manager	For information
SSE Renewables Consents Manager	For information
SSE Renewables Environmental Advisor	For information
RJ McLeod Design Management Engineer	For Information
Shetland Islands Council Planning Enforcement Officer	For information
Shetland Islands Council Natural Heritage Officer	For information

1.3 Terms of Reference

This audit has been completed with reference to the following key documents:

 Application under Section 36C of the Electricity Act 1989 to vary the consent granted under Section 36 of that Act on 4 April 2012 to construct and operate the Viking Wind Farm located in Shetland Islands Council Planning Authority Area and for a direction under Section 57 of the Town and Country Planning (Scotland) Act 1997 for planning permission to be deemed to be granted in respect of the proposed development (i.e. the 'Variation Application'). The Viking Wind Farm project will comprise the construction of 103 wind turbines with a turbine tip height of 155 m; development of a temporary construction compound; construction of associated access tracks; development of a substation; development of a convertor station; erection of permanent Met Masts; and the excavation of borrow pits.

The project was consented as detailed above, receiving Section 36C Consent and deemed planning permission on 24th May 2019.

Separate planning consents are in place for the following specific aspects of the development:

- Construction of the Kergord Access Track¹ (consented on 29th April 2019).
- Re-alignment of Sandwater Road² between the Burn of Weisdale and the junction with the A970 to facilitate construction access for the Viking Wind Farm (consented on 26th May 2020).
- Formation of temporary construction compounds at two locations; Sandwater (Main)³, consented on 22nd June 2020; and North (South of Voe)⁴ consented on 9th September 2020R.

1.4 Role of the Planning Monitoring Officer

Condition No. 3 of the Variation Application states that:

"No development shall commence unless and until the Planning Authority has approved in writing the terms of appointment by the Company of an independent and suitably qualified environmental consultant to assist the Planning Authority in monitoring compliance with the terms of the deemed planning permission and conditions attached to this consent (a Planning Monitoring Officer ("PMO"). The terms of the appointment shall:

- Impose a duty to monitor compliance with the terms of the deemed planning permission and conditions attached to this consent;
- Require the PMO to submit a monthly report to the Planning Authority summarising works undertaken on site; and
- Require the PMO to report to the Planning Authority any incidences of non-compliance with the terms of the deemed planning permission and conditions attached to this consent at the earliest practical opportunity.

The PMO shall be appointed on the approved terms throughout the period from Commencement of Development to completion of post construction restoration works.

In order to discharge the above requirements, the PMO undertakes site-based audits at monthly intervals to monitor the compliance with the conditions of the consent. The primary documents used for compliance monitoring are the Construction Environmental Management Plan (CEMP); Pollution Prevention Plan (PPP). Additional documents will be referenced as required for specific detail.

¹ Shetland Islands Council Planning Reference No: 2018/096/PFF

 $^{^{\}rm 2}$ Shetland Islands Council Planning Reference No: 2019/079/PPF

³ Shetland Islands Council Planning Reference No: 2019/188/PPF

⁴ Shetland Islands Council Planning Reference No: 2019/210/PPF

The following traffic light system is used to indicate action status:

Green – activities appear to be compliant with the CEMP, PPP and other applicable environmental management procedures and plans and there are no other issues.
Amber – in general activities are compliant with the CEMP, PPP and other applicable environmental management procedures and plans but there are minor actions required.
Red – activities may not be compliant with the CEMP, PPP and other applicable environmental management procedures and there are critical actions.

1.5 Limitations of Audit

As described above, it was agreed with SIC that the audit would be undertaken virtually using a combination of live video links, drone footage and photographs. In addition to these sources, the PMO relied on information provided by the Archaeological, Environmental and Geotechnical Clerks of Work and where required, cross referenced information with approved planning conditions and management plans to comment on compliance and identify where issues require further actions.

1.6 General Limitations and Reliance

This report has been prepared by Ramboll UK Limited ("Ramboll") exclusively for the intended use by Viking Energy Wind Farm LLP (the "client"). No other warranty, expressed or implied, is made as to the professional advice included in this report or in respect of any matters outside the agreed scope of the services or the purpose for which the report and the associated agreed scope were intended or any other services provided by Ramboll.

In preparation of the report and performance of any other services, Ramboll has relied upon site observations, publicly available information, information provided by the client and information provided by third parties. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll was accurate, complete and available to Ramboll within the reporting schedule.

Ramboll's services are not intended as legal advice, nor an exhaustive review of site conditions and/or compliance. This report and accompanying documents are intended to form a record for the purpose of documenting compliance with Condition No. 3 of the Variation Application. Ramboll neither owes nor accepts any duty to any third party, unless formally agreed by Ramboll through that party entering into, at Ramboll's sole discretion, a written reliance agreement.

2. INTRODUCTION

2.1 Objectives of Audit

The purpose of the PMO Audits is to monitor the provision of appropriate environmental management at active work sites of the project, via desk-based review of relevant documentation and site visits to be undertaken on a monthly basis to ensure compliance with the conditions of the planning consent and associated environmental management plans. As stated in Section 1.1, the site visit on this occasion was replaced by a virtual visit using live video links, drone footage, and photographs and discussion with the Clerks of Work and SSE Environmental Advisor.

Prior to undertaking Audit 004, the PMO liaised with the Council's Planning Enforcement Officer to ascertain whether the Council had received comments or concerns from the public regarding the construction works. No public comments had been received since the previous audit.

2.2 Scope of Audit

The scope of the audit was as follows:

- Review of documents provided by the Client and Principal Contractor prior to and following the audit visit. Specific references are included in the relevant sections of the report.
- A site tour, hosted by SSE's Environmental Advisor via live video links, and attended in person by SICs Planning Enforcement Officer, undertaken on 25th February 2021 which included the following locations:
 - Kergord
 - Sandwater Road
 - Mid Kame Ridge;
 - Main Compound; and
 - Nesting.
- Discussions were held on site with the Geotechnical Clerk of Works (GCoW), Environmental Clerk of Works (ECoW) and Archaeological Clerk of Works (ACoW).

A selection of photographs were taken during the audit by the SSE Environmental Advisor, as requested by the PMO based on observations made during the live video links. These are included in Appendix 1.

2.3 Site Personnel

The following site personnel were interviewed as part of this audit:

Company	Position	
SSE Renewables	Environmental Advisor	
Tony Gee and Partners	Geotechnical Clerk of Works	
MBEC	Environmental Clerk of Works	
Headland Archaeology	Archaeological Clerk of Works	

3. SITE SETTING, RECORDS AND OBSERVATIONS

Observations recorded during the remote audit are described in this section. Corresponding photographs are included in Appendix 1.

3.1 Kergord

3.1.1 Site Setting and Activities

Access to the Kergord Arrays is taken via the Kergord Access Track (KAT), which is accessed from the existing Sandwater Road along the southern boundary of the central area of the development.

Since the last audit, works have progressed from approximately CH.1200 of Spur 5, past borrow pit KBP02 and further southwards heading towards the location of turbine K54.

3.1.2 Observations

The construction of the track was observed to have progressed and new clean water cut-off trenches were observed along the track. These comprise trenches excavated on the upgradient side of the road, directing clean surface water under the track through a culvert and discharging the clean water into the downgradient catchment area. An example is shown on Photograph 1 of Appendix 1.

The excavations to form borrow pit KBP02 had commenced since the previous audit and progress is shown on Photographs 2 and 3 of Appendix 1. Peat and mineral soil had been stripped from the area, with peat being removed to a storage area. Drilling had progressed to allow a blast to be undertaken which will create the access road into the borrow pit. The blast was scheduled for the afternoon of the audit. Stone generated from the blast will be processed and used to form access tracks and turbine crane pads.

Three proposed peatland restoration areas (P04, P05 and P06) are located to the south of the current work area (beyond Junction 10) as identified in the Peat Management Plan (PMP). These restoration areas are not yet in use. A peat storage area has been created in the vicinity, in proximity to the location of K53, as shown on Photograph 4 of Appendix 1. Surveys of the aforementioned areas have been undertaken by the ECoW to delineate those that are suitable for restoration which were under review by VEWF at the time of the audit. Further details are provided in Section 3.6.2.

No further environmental issues have arisen following implementation of the mitigation measures in response to the Environmental Incident to the Burn of Droswell reported in the last audit.

3.2 Sandwater Road

3.2.1 Site Setting and Activities

Sandwater Road (B7095) is located at the southern limit of the central site area, immediately west of the junction with the A970. The Sandwater Loch is located south west of this junction, and directly to the south of the site boundary. Sandwater loch is designated as a Site of Special Scientific Interest (SSSI)⁵, notified for 'Open Water Transition Fen' and 'Mesotrophic Loch' habitats.

⁵ As notified under the Nature Conservation (Scotland) Act 2004

Since the previous PMO Audit, the eastern and western sections of the road have been joined together and activities are generally associated with creating final track levels, widening the road and ongoing reinstatement.

It is anticipated that the new Sandwater Road will be accessible for construction traffic by the middle of March 2021.

3.2.2 Observations

The PMO viewed the western end of the road which was covered with snow during the previous audit. No further excavation works have progressed in this area and a small section remains to be completed which will connect with the existing public carriageway. Culverts were observed diverting clean water under the road.

The 'transition area' that was observed during the last audit (i.e. the area where the road transitions from being floated on peat to founded on the underlying soils) had been completed, meaning that the western and eastern sections are now connected. The track was in the process of being widened to accommodate construction traffic and reinstatement of excavated soils was ongoing (refer to Photographs 5 and 6 in Appendix 1).

At the eastern end of Sandwater Road the final road levels have been achieved at the junction with the A970. Reinstatement of soils along the edge of the road was observed to be ongoing. The public car park connected to the existing Sandwater Road was observed to have been formed. Photograph 7 in Appendix 1 shows the progress that has been made in this area.

Construction of the bridge⁶ over the Burn of Pettawater was ongoing during the remote audit visit. The temporary bridge steelwork was due to be lifted into position during the week commencing 1st March 2021 and the associated hardstanding crane pad area had been formed. This temporary crossing will be used by construction traffic until the permanent bridge is constructed. The permanent bridge will be used by construction traffic (e.g. for transportation of turbines and other infrastructure) through the construction phase. Once all construction is completed, the new Sandwater Road (and permanent bridge) would be adopted by SIC for public use, replacing the existing stretch of Sandwater Road adjacent to Sandwater Loch. Silt fencing remains in place, extending beyond the active work areas, on both banks of the burn. Photograph 8 in Appendix 1 shows the eastern abutment of the temporary bridge in the foreground.

Construction works occurring on the section of road between the Pettawater Burn and Mid Kame Ridge were generally limited to the placement of LECA (lightweight clay aggregate) fill to build the road up to the required final level.

There were no issues reported with the functionality of the culverts installed beneath the road. Photographs of the culverts were taken by the SSE Environmental Advisor during the audit. No environmental incidents were reported during the audit period. Safety and Environmental Awareness Report (SEARs) are produced by the Developer to document observations and incidents on site including those which could have the potential to result in an environmental impact. A report was provided to the PMO for review which contained details of the additional mitigation measures that were put in place by the Principal Contractor within an existing roadside ditch to prevent runoff of silty water to the Burn of Pettawater. No impacts to the watercourse were reported.

⁶ The bridge crossing is being constructed in accordance with CAR License: CAR/S/1190764, dated 24th June 2020. This was provided for review during the previous audit. A method statement for the works was prepared by RJ McLeod and submitted to SEPA by SSE on 25th August 2020. SEPA confirmed via email that the method statement had been approved on 26th August 2020.

3.3 Mid Kame Ridge

3.3.1 Site Setting and Activities

The Mid Kame Ridge is accessed from the new Sandwater Road and stretches northwards towards Hamarigrind Scord. At the time of the audit, construction of the track had advanced to approximately CH.6150. A number of turbine hardstanding areas had been progressed since the last audit and peat restoration activity at P08 and P09 was ongoing.

3.3.2 Observations

The SSE Environmental Advisor indicated that material within the mineral soil store (i.e. excess mineral soil generated during excavation work throughout the project) located at the southern end of the Mid Kame Ridge (CH.20-CH.50) was being used for the formation of hardstanding at a number of turbine locations. Soil volumes and movements are tracked on the Excavation Register as referenced in Section 5.3.1 of the CEMP. A photograph of the storage area is shown on Photograph 9 of Appendix 1.

The PMO viewed the hardstanding for K87. The stone to form the crane pad had been placed following excavation of the underlying turves, peat and mineral soils. The SSE Environmental Advisor provided photographs showing the progress that had been made at the hardstanding for K86, which was observed during the previous audit (refer to Photographs 10 and 11 in Appendix 1).

At the time of the audit, a number of turbine hardstanding excavations had been progressed along the Mid Kame Ridge, including at K78, K81, K82, K83 and K87.

Since the previous audit, restoration of peat within P08 had progressed significantly and was nearing completion. Mineral soil excavated in the vicinity has been used in the formation of access tracks into P09. Three excavators were operating within P09 during the audit with peat being brought into the restoration area with dump trucks. The formation of the temporary tracks with mineral soil is in accordance with the Habitat Management Plan and the tracks are designed to act as stabilising berms upon completion of the restoration area. Tracks will not be connected to the main access tracks and will be overlain with peat so as to be integrated with the restoration structure. An aerial image shows the progress that had been made within P08 and P09 on the day following the audit (26th February 2021) on Photograph 12 of Appendix 1.

3.4 Main Compound

3.4.1 Site Setting and Activities

The Main Compound is located at the southern extent of the development site, accessed from the A970. Occupation of the Main Compound commenced on 17th December 2020 and set up of the compound is ongoing.

The upper level of the Main Compound will be used as a laydown area for materials. At the time of the audit, it was indicated that one blast remains to be carried out. Rock generated by the blast will continue to be crushed using the mobile crusher and used for construction of access tracks.

There have been no significant changes within this area since the previous audit.

3.5 Nesting

3.5.1 Site Setting and Activities

The Nesting area is accessed from the A970, via the track that leads to the Main Compound.

Since the previous audit, track construction has progressed towards N114 and N115 (Spur 22 and 23), and towards N116 and N117. The borrow pit NBP05 search area was in the process of being stripped of surface vegetation and peat in preparation for exploratory drilling and quarrying (refer to Photograph 13 in Appendix 1).

3.5.2 Observations

Construction work in the Nesting area at the time of the audit was generally focussed around progression of the access tracks. Preparatory works for the formation of borrow pit NBP05 were underway and ongoing reinstatement works were being undertaken.

The PMO viewed progress of the tracks leading to N116 (Spur 21) and N117 (Spur 24) from Junction 23. Photograph 14 in Appendix 1 shows the progress that has been made on Spur 24. Progress towards N114 and N115 at Spur 22 and Spur 23 was also observed (refer to Photograph 15 in Appendix 1).

Peat restoration area P27 is located in the vicinity of NBP05. A survey of the area was carried out by the ECoW which confirmed that a larger area than anticipated would be suitable for restoration due to the presence of eroded peat (i.e. peat hags). This is shown on Photograph 16 in Appendix 1. It was reported that this area has been demarcated using canes and that discussions relating to the use of this area for peat restoration were ongoing between the Developer, the Principal Contractor, and the ECoW.

The Environmental Advisor confirmed that the Crookadale Burn culvert that was damaged prior to the previous audit had been repaired.

3.6 Communication with Clerks of Work

3.6.1 GCoW

Condition 39 of the planning consent requires the appointment of a Geotechnical Clerk of Works (GCoW) to minimise the risk of peat failure arising from the development. A video call was held between the PMO and GCoW as part of the remote audit on 24th February 2021.

The GCoW advised that minor peat slippages had occurred since the last audit which were recorded on the Peat Risk Registers (PRR). Copies of the PRR and a Geotechnical Event Report were provided to the PMO for review and it was confirmed that the slippages were recorded on the PRRs and that the Principal Contractor was taking appropriate actions to mitigate further risks.

Risks and mitigation measures associated with this activity should continue to be communicated with the construction team working in these areas, as per the commitments in the PRR

3.6.2 ECoW

Condition 19 of the planning consent requires the appointment of an Ecological Clerk of Works to ensure protection of the natural heritage of the area.

Monthly reports are prepared by the ECoW for submission to SSE Renewables to document the works carried out. At the time of the audit, the most recent ECoW report covered Weeks 28 and 29 (i.e. up to and including 24th January 2021), which fell within the period of the previous PMO audit. As such, the activities undertaken by The ECoW during this PMO audit period (i.e. between 27th January to 25th February 2021) were discussed on a teleconference on 25th February 2021.

The ECoW advised that one of the predominant activities undertaken since the last PMO audit related to monitoring of the peat restoration areas P08 and P09. P08 was reported to be nearing completion and restoration of P09 had commenced. It was reported that reseeding of the peat

restoration areas would be undertaken at the earliest opportunity in accordance with seasonal and climactic conditions. Should future reseeding be required, this would be addressed in accordance with the contents of the Habitat Management Plan (HMP). Monitoring of these areas is undertaken regularly and will continue throughout the project (and beyond).

The ECoW confirmed that surveys were undertaken to delineate peat restoration areas P04, P05 and P06, located in the vicinity of K53. At the time of the audit the report prepared by the ECoW had been submitted to the VEWF team for review. The areas identified to be suitable for restoration were demarcated by the ECoW and are in discussion with the development team for viability.

3.6.3 ACoW

Condition 29 of the planning consent requires the appointment of an Archaeological Clerk of Works to ensure archaeological features are protected and recorded during the development. A video call was held between the PMO and ACoW as part of the remote audit on 24th February 2021.

The ACoW shared the GIS Trigger Map with the PMO during the audit which is the main database for recording observations and progress throughout the construction works.

An update on the archaeological watching briefs and monitoring that has been carried out since the previous PMO audit was provided, as summarised below:

- The full time watching brief at the Mid Kame Ridge has advanced as far as CH.6150. A 50 m stretch remains to be completed. Excavation of the track has temporarily ceased beyond this point to divert resources to other works areas. Daily monitoring is undertaken by the ACoW in this area in the interim, and the full time watching brief will recommence between CH.6150 and CH.6200.
- There has been no requirement for full time watching briefs at Kergord since the last audit. Daily monitoring checks are undertaken. A stone cairn was identified by the ACoW in proximity to borrow pit KBP02. In order to protect this feature, the cairn was demarcated using flags and the construction team progressing works at this location (plant operators and foreman) and the SSE Environmental Adviser were made aware of its presence.
- A WWII Nissen Hut was previously identified (during investigations in 2020) in the northern area of the site at the location of a borrow pit, in proximity to the North Compound. This will require to be recorded by the ACoW as part of the future excavations in the area. Construction at this location is not expected in the short term, however a method statement has been prepared for the works which has been submitted to the Shetland Amenity Trust for approval. The ACoW fenced off the area as a precautionary measure given that road diversion works are currently in place on the A970.
- At Sandwater Road, there remains a 20 m stretch of the road to be excavated which will require a watching brief.
- The ACoW reported that plans showing peat restoration areas had not previously been provided by the development team. A copy of the plan was provided so that the proposed restoration areas can be reviewed in conjunction with the existing Written Scheme of Investigation (WSI) and updates made to the WSI if required. This will be checked during the next PMO audit.

3.7 Scope of next audit

The scope of the next PMO audit remains to be confirmed and will be dependent on the specific activities undertaken at the development site in the preceding days and weeks. This is likely to include:

- Update on progress of construction works at Kergord, Mid Kame Ridge, Sandwater Road and Nesting.
- Consideration of any comments received by the Council or SSE in relation to the works, including visits to view specific areas of concern.
- A review of the temporary bridge placement across the Pettawater Burn.
- Update on formation of peat restoration areas.
- Updates from ACoW, ECoW and GCoW teams.

VIKING ENERGY WIND FARM

4. AUDIT FINDINGS AND REQUIRED ACTIONS

Issue	ssue Auditor Comments Re		Action Owner	Status				
Actions carried fromward from Audit 003								
Natural and Built Environment (reinstatement) Materials storage and handling (soil storage)	No significant issues were raised by the ECoW with respect to the reinstatement and storage of soils (turves, peat and mineral soils) since the last audit. Storage and reinstatement of soils will continue to be closely monitored by the ECoW team and areas for improvement communicated with the Principal Contractor and the Developer as required.	None, other than ongoing monitoring.	VEWF with assistance from ECoW team	Green				
Actions arising from Audit 0	004							
Material storage and handling	Review of Peat Risk Registers confirmed that work areas are monitored regularly and that appropriate mitigation measures are implemented where required.	None, other than ongoing communication with site personnel regarding the risks associated with overloading soils.	VEWF with assistance from GCoW.	Green				

PLANNING MONITORING OFFICER AUDIT REPORT 004: 27th JANUARY TO 25th FEBRUARY 2021 VIKING ENERGY WIND FARM

APPENDIX 1 PHOTOLOG





Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	25 th February 2021





Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	25 th February 2021





Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	25 th February 2021





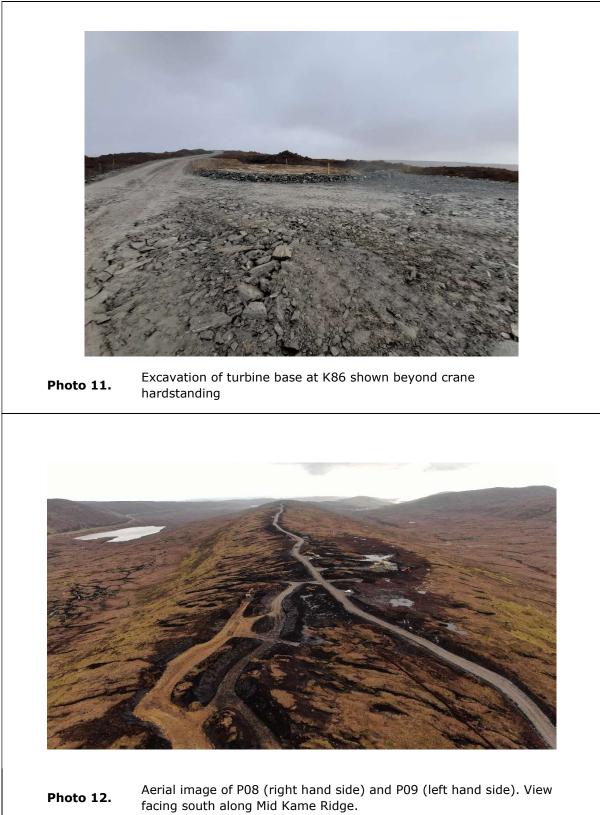
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Site:	Viking Energy Wind Farm	Date:	25 th February 2021





Title:	Photographic Log	Client:	Viking Energy Wind Farm
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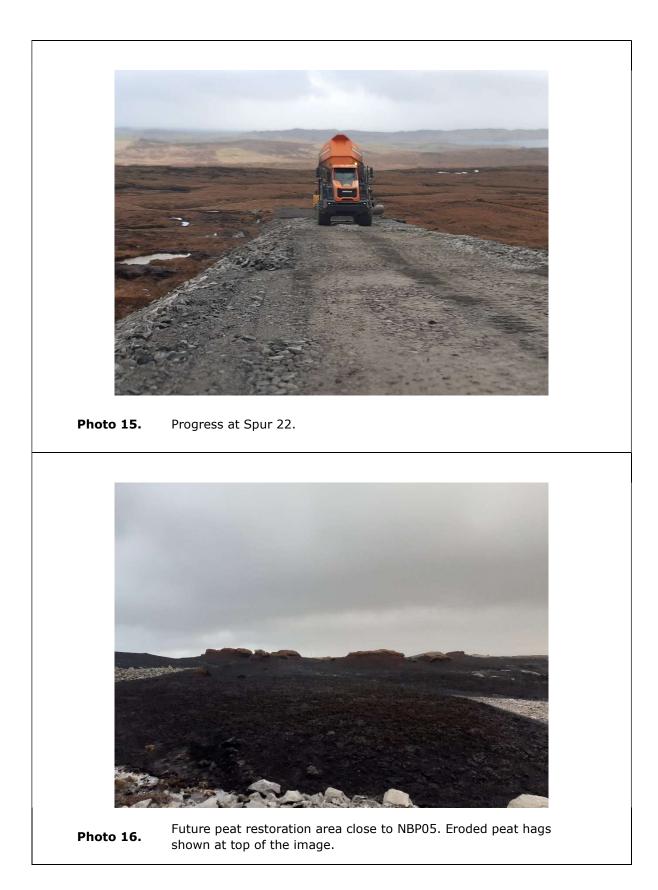
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