Intended for
Viking Energy Wind Farm LLP

Date
April 2021

Project Number
1620009158

VIKING ENERGY WIND FARM
PLANNING MONITORING OFFICER AUDIT REPORT 005: 26TH FEBRUARY TO 24TH MARCH 2021

RAMBOLL

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005: 26TH FEBRUARY TO 24TH MARCH 2021

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1. AUDIT DETAILS

1.1 Audit Details

Audit Number	PMO 005
Location	Kergord Access Track Kergord Sandwater Road Mid Kames Ridge Main Construction Compound Nesting Locations were accessed by SSE Environmental Advisor and the SIC Planning Enforcement Officer. Video calls were undertaken 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, (6°C).
Audit Date	23rd to 24th March 2021
Audit Period	26th February to 24th March 2021
Audit Owner	Ramboll UK Ltd

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 Track[1] (consented on 29th April 2019).
- Re-alignment of Sandwater Road[2] 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); and the Pollution Prevention Plan (PPP). Additional documents will be referenced as required for specific detail.

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

It was agreed with SIC that the audit would be undertaken virtually using a combination of 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 1.5, the site visit was replaced by a virtual visit using video links, drone footage, and photographs and discussion with the Clerks of Work, SSE Environmental Advisor and RJ McLeod (RJM) Design Management Engineer.

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 video link, and attended in person by SICs Planning Enforcement Officer, undertaken on 24th March 2021 which included the following locations:
  - Kergord Access Track;
  - Kergord;
  - Sandwater Road;
  - Mid Kame Ridge;
  - Main Compound; and
  - Nesting.
- Discussions were held with the Geotechnical Clerk of Works (GCoW), Environmental Clerk of Works (ECoW), Archaeological Clerk of Works (ACoW) and RJM Design Management Engineer.

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 audit. 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
RJ McLeod	Design Management Engineer
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

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.

3.1.2 Observations

The Droswell Burn culvert under the Kergord Access Track (KAT) was observed during the audit and is shown on Photograph 1 in Appendix 1. It has been noted by the site team that there are occasional occurrences of silt discharge from beneath the culvert structure following periods of heavy rain. No significant impacts to the Droswell Burn have been recorded and the area is monitored regularly. In addition, discussions are ongoing between the Developer and the Principal Contractor to ascertain the need for additional mitigation measures to further limit environmental risks to the watercourse.

Construction was being undertaken at the junction of the KAT with Spur 5. Initial formation in this area comprised a pilot track to progress towards the Kergord Array. Stone has since been placed to complete the formation of the track.

Since the last audit, the construction of the track within the Kergord Arrays was observed to have progressed southwards and was approaching Junction 8 (Array E). During the audit, the PMO observed the installation of drainage mitigation measures at Junction 10; soil stripping on the track southwards beyond Junction 9, and the installation of silt fencing downgradient of the track route prior to construction in the vicinity of Junction 8.

Construction work was continuing at borrow pit KBP02 and preparations (i.e. drilling) had been undertaken for a blast to widen the access point into the borrow pit (refer to Photograph 2 in Appendix 1).

Peat restoration has commenced at PN01 in the vicinity of K53. Through further ecological and geotechnical assessment of the area in the vicinity of K53, and due to ongoing construction works, this area was identified as being suitable for restoration following assessment by the development team and is additional to the areas initially identified for potential restoration in the PMP and Habitat Management Plan (HMP). These documents detail the areas considered suitable for restoration based on the findings of a desktop study, and do not discount the possibility that other areas may be defined as suitable by the Clerks of Works team. Tracks were created from stone excavated from KBP02 to access the restoration area. Now that peat placement is nearing completion, tracks are to be disconnected from the main access tracks and will be covered over with peat (minimum 1 m thickness). Turves were observed being placed over the peat by a long-reach excavator. It was also noted that prior to construction works, that the volume of turves in the area was low. Reseeding of the restored peat will be required, which is in accordance with the HMP. The extent of peat restoration within PN01 is shown on Photographs 3 and 4 of Appendix 1.

The access tracks have progressed around the three proposed peatland restoration areas P04, P05 and P06 as identified in the Peat Management Plan (PMP). Discussions between the Developer and Principal Contractor are ongoing to confirm the extent of each area that will be viable for restoration and the most appropriate access routes into the areas.

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.

Since the previous PMO Audit, the temporary bridge over the Burn of Pettawater has been constructed and is now open to construction traffic accessing the west of the wind farm development site (i.e. Kergord and the Mid Kame Ridge). Road widening is ongoing close to the junction with the Mid Kame Ridge and dressing and reprofiling of the road verges are continuing.

3.2.2 Observations

During the audit construction was occurring at approximately CH.800 to CH.900 to widen the road in this area. It was noted that the verges on the southern side of the road have been reprofiled as shown on Photograph 5 in Appendix 1.

The temporary bridge[6] over the Burn of Pettawater towards the eastern end of the new Sandwater Road was in place and in use by construction traffic. Construction of the permanent bridge is ongoing which was observed by the PMO during the audit as shown on Photograph 6. Both bridges are shown on Photographs 6 and 7 of Appendix 1.

Piezometers remain installed in the new road to monitor settlement.

The eastern part of Sandwater Road was undergoing reprofiling on the southern verges as shown on Photograph 8 of Appendix 1. Reprofiling work to the northern verge will follow.

It was confirmed by the SSE Environmental Advisor and RJM Design Management Engineer that there were no issues with surface water runoff in this area since the previous audit.

3.3 Mid Kame Ridge

3.3.1 Site Setting and Activities

The Mid Kame Ridge (MKR) 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 towards the northern junction with the A970. Hardstanding areas for the majority of the turbines along the MKR (K78 to K88) had been formed. Peat restoration activities were continuing at P08 and P09.

3.3.2 Observations

The PMO observed the works that have been undertaken at the hardstanding for K88, the southernmost turbine on the MKR. The area is shown on Photograph 9 of Appendix 1.

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

[6] The temporary and permanent bridge crossings are 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.

Peat restoration area P08 was nearing completion. Works that remain to be completed include disconnection of the access tracks which involves excavation of channels through the tracks to separate these from the main wind farm access tracks and covering over with a minimum of 1m of peat. Clean ponded water was observed within P08 and it was confirmed that this would be removed from the restoration area using a pump.

Works within peat restoration area P09 were also nearing completion at the time of the audit.

At the northern end of the MKR, a pilot track has been formed to allow the creation of the final stretch of the access track and junction with the A970. Excavators have stripped soil from this area and the SSE Environmental Advisor explained that a blast would be undertaken in order to achieve the required width for the track. Photograph 10 in Appendix 1 shows the ongoing construction works taking place during the audit at the junction with the A970.

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, including formation of the upper level which will comprise a material laydown area.

3.4.2 Observations

Integrally bunded generators are located at the Main Compound to provide power for site cabins which contain office accommodation and welfare facilities. Plant nappies were observed beneath the generators and spill kits were present in the storage area. It was reported that the generators and associated hoses and joints are inspected twice per day for signs of leaks or spillages.

Four locked, covered skips are located in a dedicated waste storage area for the storage of general waste and recyclable materials.

The access road leading to the Main Compound from the A970 is due to be surfaced with asphalt in the coming weeks.

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, peat restoration activities are ongoing and excavation of the borrow pit NBP05 is continuing.

3.5.2 Observations

Spur 23 was observed to have progressed towards turbine location N115 since the previous audit. A member of the ACoW team was working in this area, undertaking the watching brief required at this location during soil stripping.

The hardstanding for turbine N116 was in the process of being formed during the audit as shown on Photograph 11 in Appendix 1.

Spur 24 has progressed as far as Junction 29 and an excavator was observed working in this area during the audit stripping soil. Spur 28 leads in a south westerly direction from this junction and

formation of this track has commenced with the stripping of soils and placement of stone as shown on Photograph 12 in Appendix 1.

Progress has been made in forming the access track into peat restoration area P27. Discussions regarding the most appropriate method of progressing the restoration works are ongoing between the Developer and the Principal Contractor. The PMO observed areas of bare peat flats within P27 and this is shown on Photographs 13 and 14 of Appendix 1. It was reported that areas of habitat in good condition have been demarcated by the ECoW and that these areas would be avoided during restoration to avoid deterioration of these features. This is shown on Photograph 15 in Appendix 1.

Borrow Pit NBP05 was observed and it was noted that tracks have been formed leading into the borrow pit. Preparatory work had been undertaken in advance of the first blast which was scheduled for the day following the audit. Drainage mitigation measures were observed downgradient of the borrow pit; these included the formation of a soil bund along the edge of the borrow pit, a settlement pond and a series of silt fences beyond the pond within the catchment area. This is shown on Photograph 16 of Appendix 1.

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 23rd March 2021.

The GCoW outlined the monitoring work that had been undertaken since the last audit. This included ongoing monitoring of the general construction works, including peat restoration areas, providing advice to the Developer and Principal Contractor teams in relation to peat and soil storage and handling, review of the Peat Risk Registers (PRR) and providing any additional comments as required.

Updated copies of the PRRs were provided to the PMO for review. Review of the PRRs confirmed that risk levels and mitigation measures were appropriately documented and that regular monitoring and updating of the registers is undertaken by the Principal Contractors Engineer (Sweco).

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. A video call was held between the PMO and ECoW as part of the remote audit on 23rd March 2021.

The ECoW confirmed that a monthly report had been prepared covering the four weeks since the 24th January 2021 and had been submitted to the Developer in accordance with the commitments in the CEMP.

Monitoring activities undertaken by the ECoW team since the last audit were discussed. The ECoW confirmed that discussions were ongoing between the Developer and the Principal Contractor in relation to peat restoration areas P04, P05 and P06 as described in Section 3.1.2; advised that the Developer and Principal Contractor were investigating the potential for additional mitigation measures at the Droswell Burn culvert beneath the KAT, as described in Section 3.1.2; and advised that reseeding would be required in peat restoration area P09, in line with the HMP. It was also stated that a HMP Officer has been appointed and that surveys were in the process of being undertaken for peat restoration areas P01, P02 and P03.

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 23rd March 2021.

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 been completed. Works going forward in this area will involve daily monitoring checks as with the other areas of the site.
- There has been no requirement for full time watching briefs at Kergord (i.e. the western site area) since the last audit. Daily monitoring checks are undertaken.
- At Sandwater Road, there remains a 20 m stretch of the road to be excavated which will require a watching brief.
- A full time watching brief is required on the approach to turbine location N119 on Spur 24. At the time of the audit this area had not yet been reached.

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 SIC or the Developer in relation to the works, including visits to view specific areas of concern.
- A review of the bridge construction across the Burn of Pettawater.
- Update on the formation of peat restoration areas.
- Update on the construction of borrow pits.
- Updates from the ACoW, ECoW and GCoW teams.

4. AUDIT FINDINGS AND REQUIRED ACTIONS

Issue	Auditor Comments	Required Action	Action Owner	Status
Materials Storage and Handling (e.g. oil/fuel storage and peat/mineral soil storage and handling).	No issues were identified.	No action required.	N/A	Green
Natural and Built Environment (e.g. ecology, biosecurity, protected sites, archaeology and site restoration).	No issues were identified.	No action required.	N/A	Green
Pollution Prevention and Response (e.g. use of spill kits, silt control, cement/concrete, water resources).	No issues were identified.	No action required. It is noted that discussions are ongoing between the Developer and the Principal Contractor relating to the possible requirement for additional mitigation measures at the Droswell Burn culvert.	N/A	Green
Nuisance and Statutory Nuisance (e.g. noise and vibration, dust/air quality, litter).	No issues were identified.	No action required.	N/A	Green
Resources, Waste and Transport.	No issues were identified.	No action required.	N/A	Green
Pre-Planning Works (e.g. site set-up and general management, access tracks, community liaison).	No issues were identified.	No action required.	N/A	Green

APPENDIX 1
PHOTOLOG

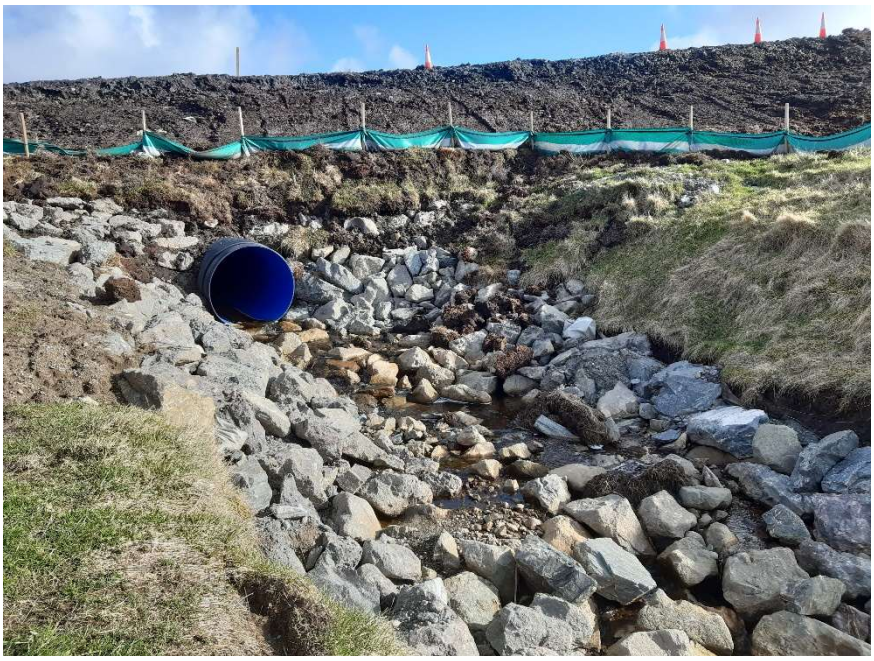

Photo 1. Droswell Burn culvert beneath Kergord Access Track

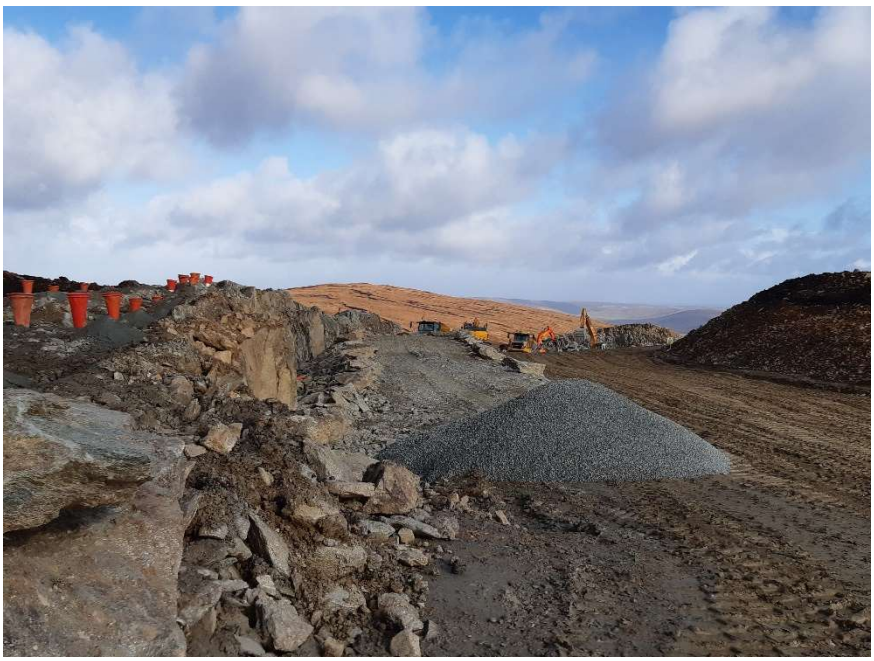

Photo 2. Access to borrow pit KBP02. Area prepared for blasting is shown on the left hand side of the image.

Title:	Photographic Log	**Viking**	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	**Date:**	24th March 2021

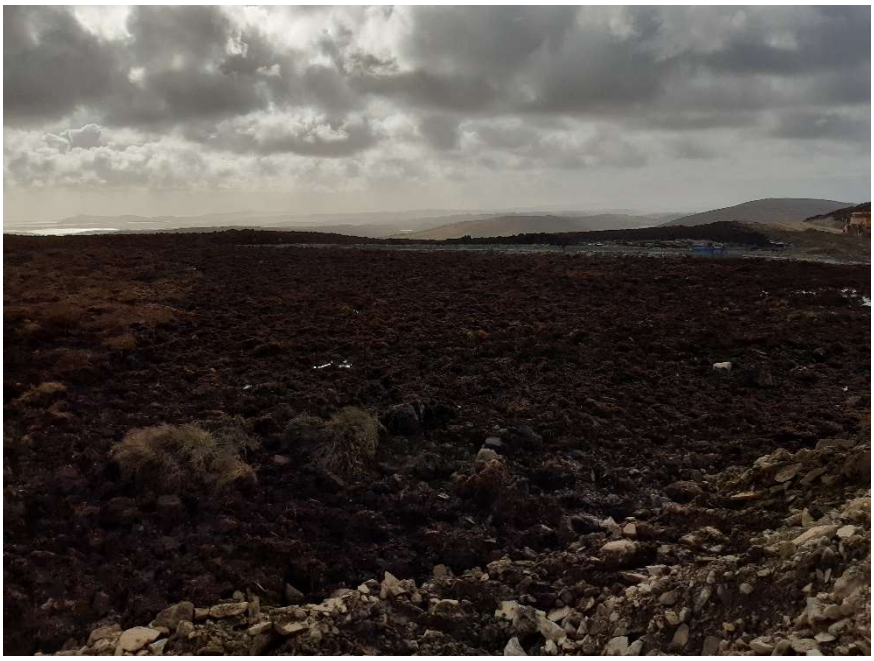

Photo 3. Peat restoration within PN01

Photo 4. Aerial image showing the extent of peat restoration area PN01

Title:	Photographic Log	**Viking**	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	**Date:**	24th March 2021

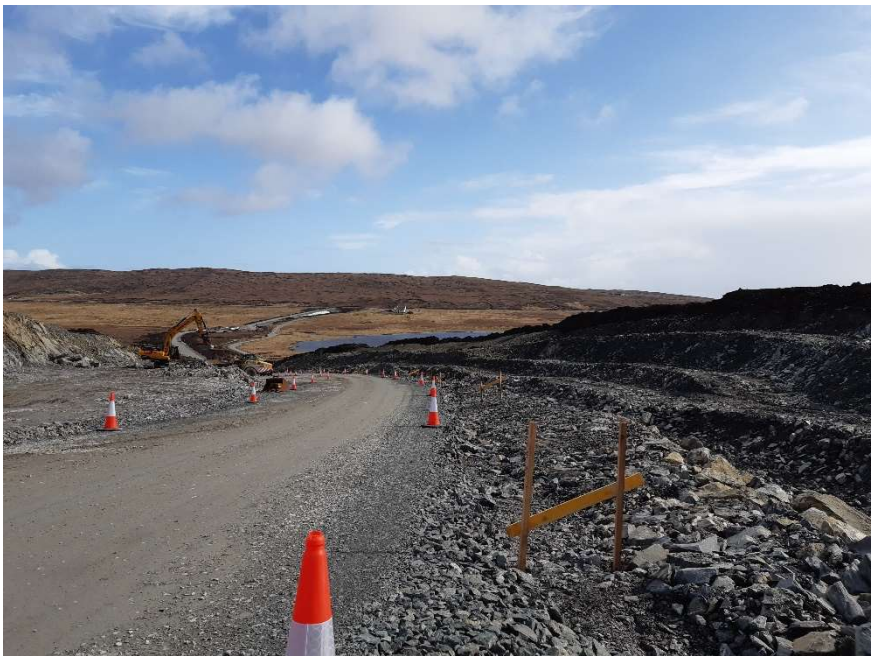

Photo 5. Reprofiling of verge on Sandwater Road.

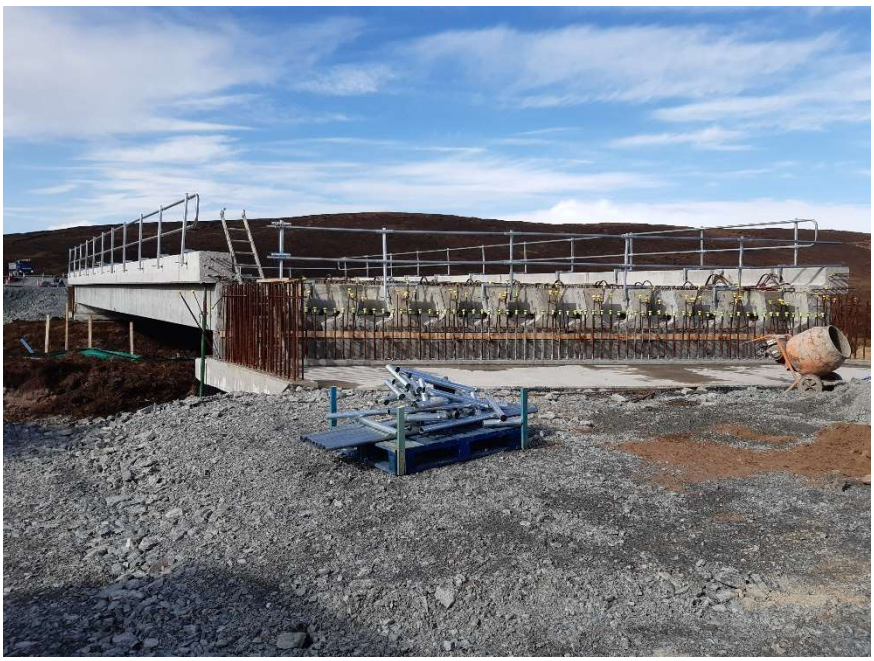

Photo 6. Construction of the permanent bridge over the Burn of Pettawater

Title:	Photographic Log	**Viking**	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	**Date:**	24th March 2021

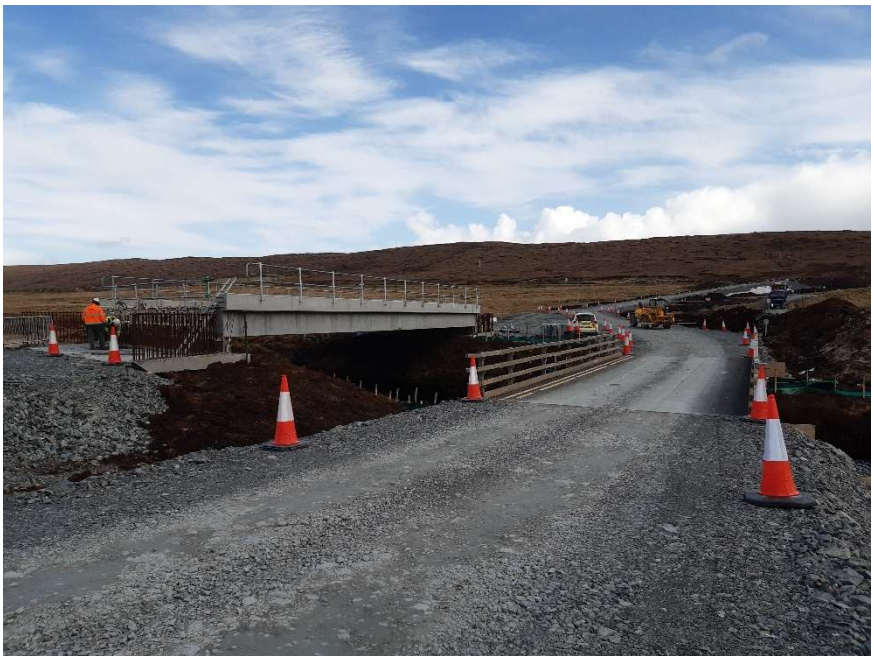

Photo 7. Temporary bridge over the Burn of Pettawater shown on the right. Permanent bridge, under construction, located immediately to the left.

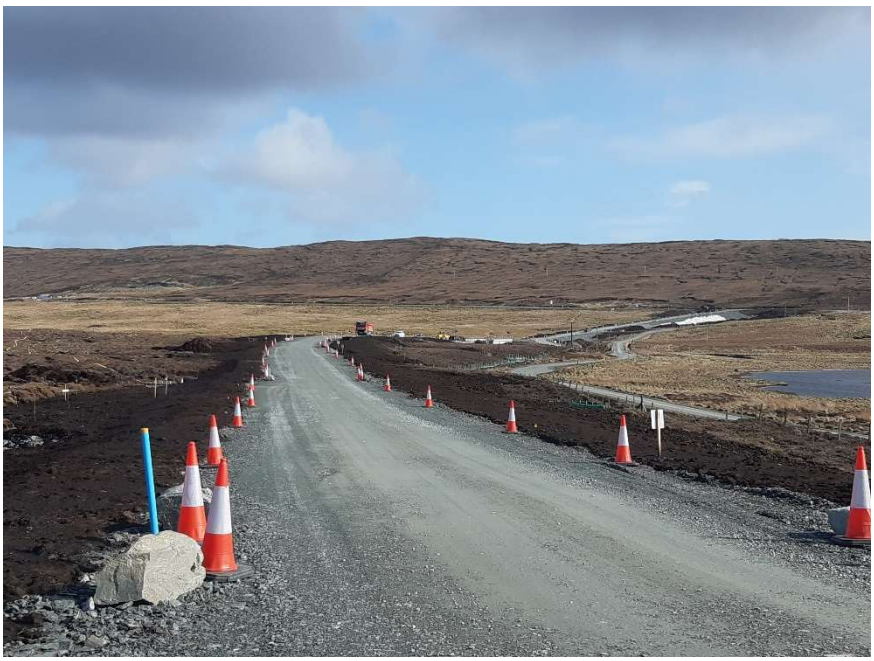

Photo 8. Sandwater Road, facing east, showing ongoing reprofiling works.

Title:	Photographic Log	**Viking**	Viking Energy Wind Farm
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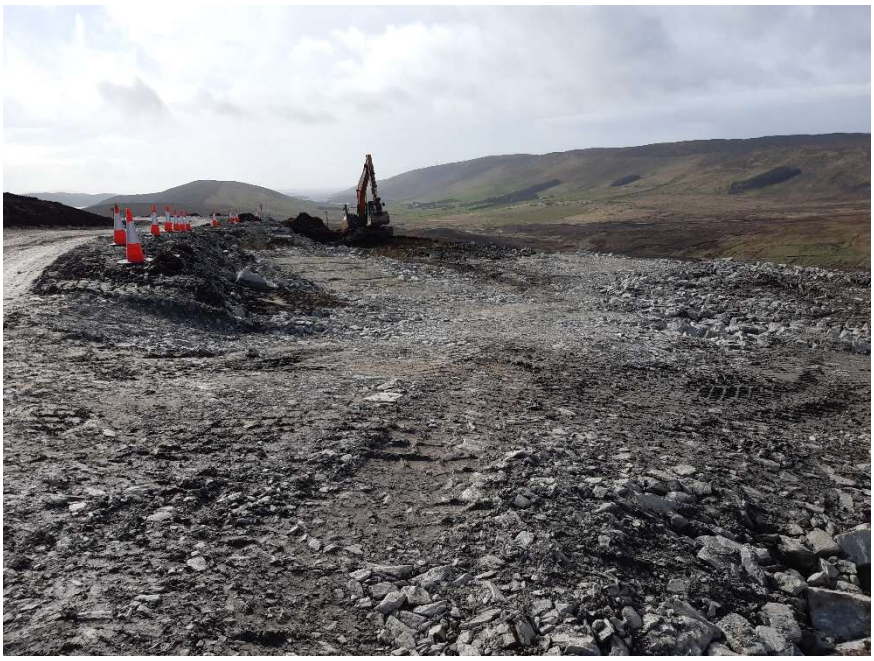

Photo 9. K88 Hardstanding crane pad.

Photo 10. Track construction at the northern end of Mid Kame Ridge at the junction with the A970.

Title:	Photographic Log	**Viking**	Viking Energy Wind Farm
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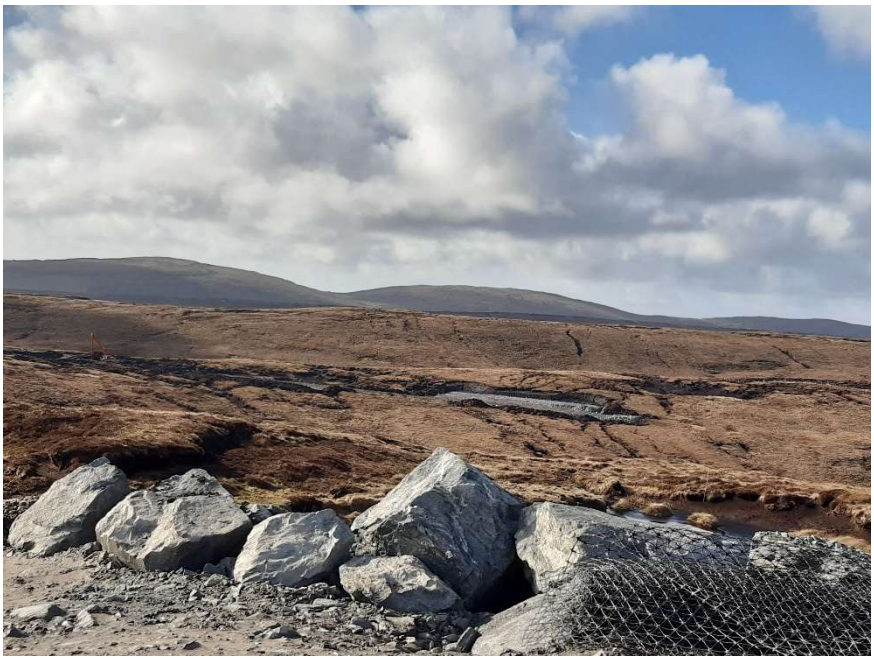

Photo 11. Hardstanding for turbine N116 shown in distance.

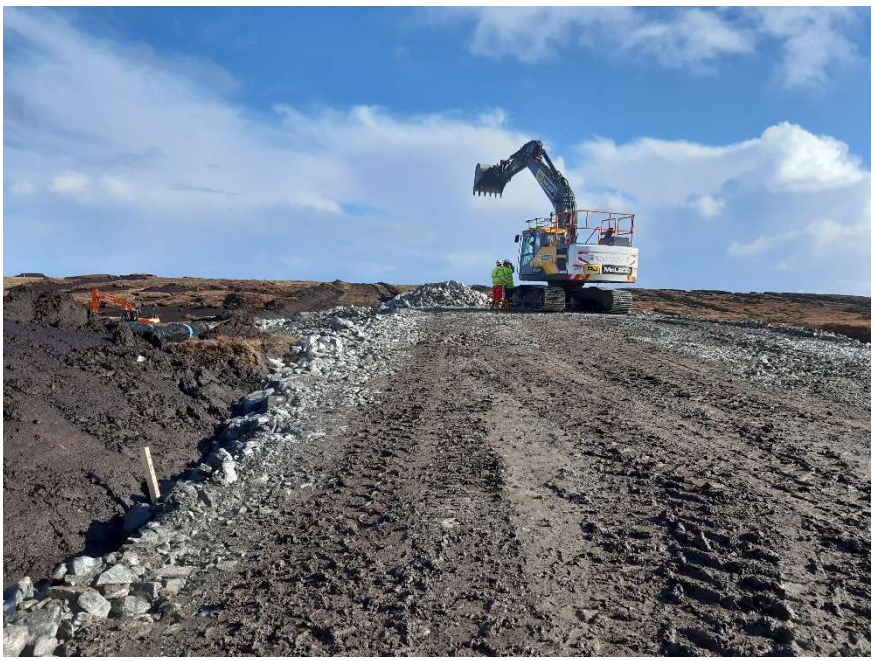

Photo 12. Progress of track construction at Spur 28.

Title:	Photographic Log	**Viking**	Viking Energy Wind Farm
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Photo 13. View of bare peat flats located within peat restoration area P27.

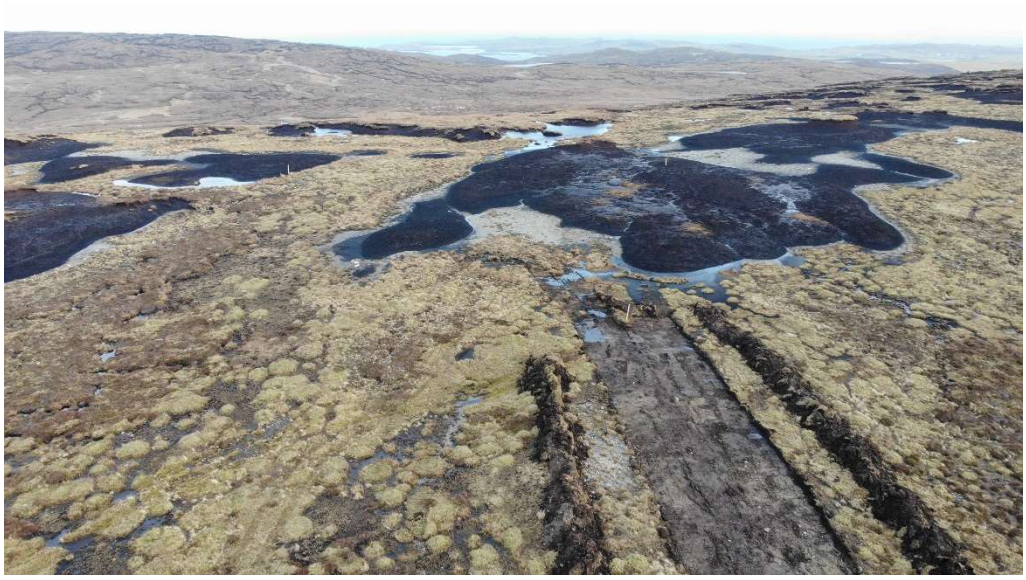

Photo 14. Aerial image showing access track to peat restoration area P27 and the extent of bare peat flats in the vicinity.

Title:	Photographic Log	**Viking**	Viking Energy Wind Farm
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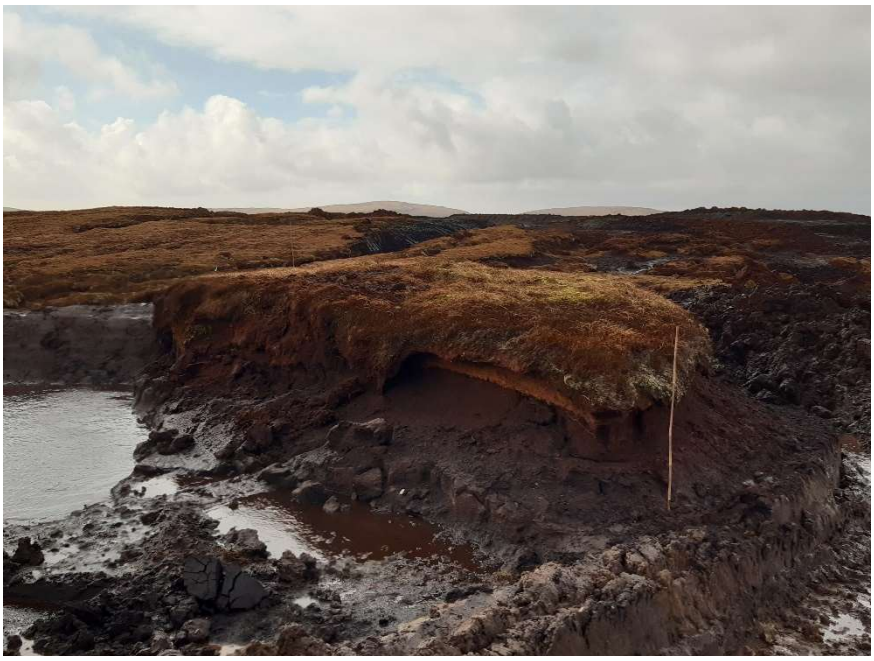

Photo 15. Example of canes that have been used to demarcate areas of peat to be avoided during restoration at P27.

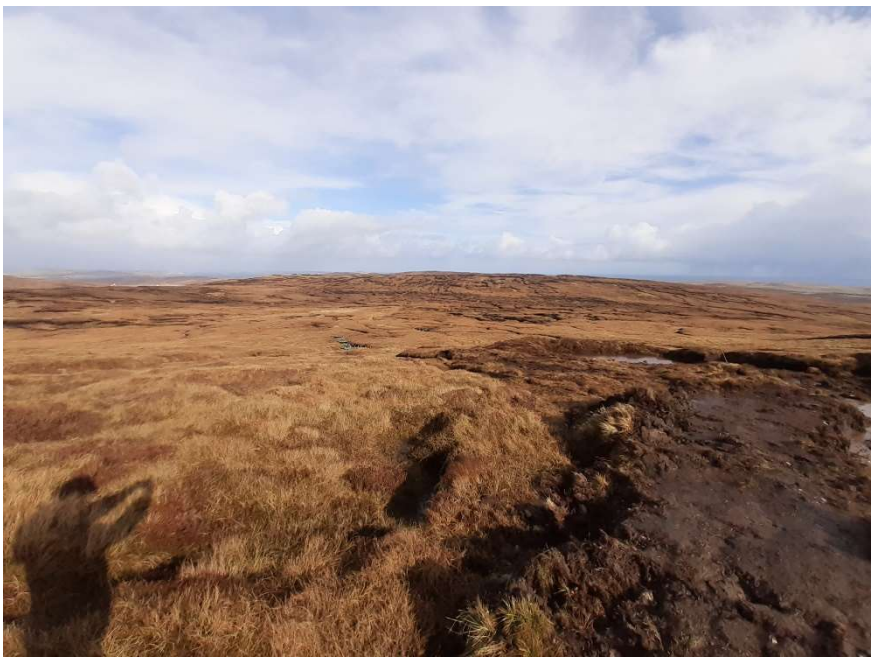

Photo 16. View from the edge of borrow pit NBP05 showing drainage mitigation measures including settlement pond and silt fences present in the distance.

Title:	Photographic Log	**Viking**	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	**Date:**	24th March 2021