Intended for

Viking Energy Wind Farm LLP

Date

May 2021

Project Number **1620009158**

VIKING ENERGY WIND FARM PLANNING MONITORING OFFICER AUDIT REPORT 006: 25TH MARCH TO 27TH APRIL 2021



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1. AUDIT DETAILS

1.1 Audit Details

Audit Number	PMO 006		
Location	Kergord Access Track		
	Kergord		
	Sandwater Road		
	Mid Kames Ridge		
	North Compound		
	Main Construction Compound		
	Nesting		
Weather Conditions	Rain showers, windy, cold, (6°C).		
Audit Date	22 nd to 27 th April 2021		
Audit Period	25 th March to 27 th April 2021		
Audit Owner	Ramboll UK Ltd		

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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 2020.

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.

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.

 $^{^{\}mathrm{1}}$ 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

1.5 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.

2.2 Scope of Audit

The scope of the audit was as follows:

- Liaison with SIC regarding public concerns or complaints received during the audit period.
 - A complaint was received by SIC relating to the generation of dust on the Kergord Access Track (KAT).
 - It was highlighted that a peat slippage had occurred in the Kergord area on 18th April 2021 which was discussed at a Community Liaison meeting on 20th April 2021.
- 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 visit attended by the PMO, SSE Environmental Advisor, RJM Design Management Engineer, SSE Consents Manager, SIC Planning Enforcement Officer and SIC Natural Heritage Officer undertaken on 27th March 2021 which included the following locations:
 - Kergord;
 - Sandwater Road;
 - Mid Kame Ridge;
 - North Compound;
 - 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 SSE Civil Engineer.

A selection of photographs taken during the audit 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	
SSE Renewables	Civil Engineer	
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 made during the audit are described in this section. Corresponding photographs are included in Appendix 1, alongside a plan of the site indicating the location of each photograph.

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.

Activities in this area during the audit including progression of access tracks, peat restoration, rock extraction at borrow pits and formation of crane pad hardstanding areas.

3.1.2 Observations

Construction of the tracks within the Kergord Arrays were observed to have progressed towards K52 on Spur 5; K55 on Spur 12; K56 on Spur 13; and towards K60 on Spur 4.

Rock extraction from borrow pit KBP02 is ongoing and this area was viewed during the audit (refer to Photo 1 in Appendix 1). The extracted rock continues to be used for the formation of tracks and crane pad hardstandings.

The hardstanding crane pad for K54 has been formed, and excavation of the turbine base at this location had also commenced.

Two excavators were observed to be working in peat restoration area P05 (refer to Photo 2 in Appendix 1) and peat restoration within PN01 is also ongoing.

Mitigation measures compliant with Section 7.1 of the CEMP have been implemented along the Kergord Access Track (KAT) in response to public concerns regarding the generation of dust in this location due to vehicle movements. Perforated pipes connected to a pump and clean water supply have been positioned along a 250 m stretch of the edge of the road verge which are used to 'damp down' the access track surface during dry periods (refer to Photo 3 in Appendix 1). Reminders of the site speed limit of 15 mph were provided to vehicle operatives. The Principal Contractor also confirmed that additional water bowsers for dust suppression use have been sourced and that regular visual monitoring is undertaken.

A peat slippage occurred at CH2450 of Spur 4 (coinciding with the location of borrow pit KBP05) on 18th April 2021 following the excavations to form the access track. It was reported that turves excavated during the construction of the track had been temporarily stockpiled to the side of the track to be used for reinstatement. A section of the turves subsequently slipped down the hillside.

The PMO observed recovery of the slipped peat during the audit. An excavator was working in the area and a series of bunds have been created within the slipped area to stabilise the slope. This is shown on Photo 4 of Appendix 1.

The CEMP sets out the requirement for the Principal Contractor to maintain a Peat Risk Register (PRR). The area where the peat slip occurred was previously identified on the PRR for the relevant array (Array E). Mitigation measures set out in the PRR relating to the risk of movement of steep slopes as identified between CH2300 and CH2500 were to minimise the volume of peat stored. This was carried out by the Principal Contractor since only turves were stored at the side of track, with the underlying peat soils removed to the peat restoration area, to minimise the volume of material stored in the vicinity of the track.

Discussions between SSE and the Principal Contractor are currently ongoing to ascertain whether there are additional mitigation measures that could be implemented in future for areas where similar topography and related risks are identified.

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.

Activities in this area included road widening, bridge construction and ongoing reinstatement.

3.2.2 Observations

There were no active construction works occurring in the western half of Sandwater Road during the audit, however peat reinstatement is ongoing in this area.

East of the Mid Kames Ridge access point, work is continuing to widen the road at approximately CH.800 to CH.900.

Construction of the permanent bridge over the Burn of Pettawater is ongoing which was observed by the PMO during the audit as shown on Photo 5 of Appendix 1.

Reinstatement of the southern verge on the eastern half of Sandwater Road had continued since the last audit and reseeding will be undertaken following confirmation of an appropriate seed mix. Reprofiling work to the northern verge will follow at a later date.

Recently implemented dust mitigation measures were observed on Sandwater Road, comprising perforated pipes connected to a pump and clean water supply (refer to Photo 6 in Appendix 1).

It was confirmed by RJM Design Management Engineer that there were no issues with surface water runoff in this area during the audit period.

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. Track construction, reinstatement, crane pad hardstanding formation and ground investigation works were being undertaken during the audit.

3.3.2 Observations

The PMO observed a variety of works being undertaken along the length of the MKR during the audit.

Intrusive ground investigations comprising drilling with a rotary rig are being undertaken by a subcontractor to confirm the depth to rockhead at the turbine bases along the MKR.

An excavator was observed carrying out reinstatement work along the eastern verge of the track.

 $^{^{\}rm 5}$ As notified under the Nature Conservation (Scotland) Act 2004

Active work in peat restoration areas P08 and P09 has been completed, with ongoing monitoring undertaken by the ECoW and GCoW. P08 as viewed from the MKR track is shown on Photo 7 in Appendix 1.

The crane pad hardstanding for K79 has been formed and the turbine base excavated as shown on Photo 8 of Appendix 1. Peat restoration area P09 is located to the rear of the turbine base excavation.

At the northern end of the MKR at Hamarigrind Scord, work is ongoing to form the junction with the A970 and to construct the final stretch of the access track that will connect with the MKR. Rock was in the process of being extracted from this area during the audit which was used for the formation of the crane pad hardstanding for turbine K78. The PMO observed a settlement pond downgradient of active work area at Hamarigrind Scord used to intercept silty water. The water is subsequently pumped back up the hill to the upgradient catchment area. The general work area is shown on Photo 9 of Appendix 1; the settlement pond is located between the machinery and the A970 road beyond (not visible in photo).

3.4 North Compound

3.4.1 Site Setting and Activities

The North Compound is located towards the northern limit of the site on the eastern side of the A970. Activities that have been undertaken in this area have included ecological surveys and commencement of excavations to form the compound platform.

3.4.2 Observations

At the time of the audit the work being carried out in the North Compound was limited to the excavation and stockpiling of soil and rock. The immediate junction of the future access track to the North Compound was observed to have been surfaced in asphalt (refer to Photo 10 in Appendix 1).

Prior to the commencement of physical earthworks in the main compound, pre-construction ecological surveys were undertaken which included breeding bird surveys. Once the ECoW confirmed that there were no nesting birds in the work area that could pose a constraint to the development, works were able to be progressed by the Principal Contractor.

Pre-construction surveys undertaken by the ECoW confirmed the presence of the invasive (non-native) species Montbretia $Crocosmia \times crocosmiiflora$. Condition 8(j) of the Planning Consent for the North Compound outlines the requirement for all contractors and personnel to be briefed on the presence of this invasive plant at the site and the need to apply relevant biosecurity best practice measures to avoid the spread of the species off-site. A Method Statement for the Formation of the North Compound Platform, dated 16^{th} April 2021, was prepared by the Principal Contractor and provided to the PMO for review. The presence of Montbretia in the North Compound was highlighted within the document and it was reported that locations where this was identified had been demarcated. Removal of the plants was supervised by the ECoW, and a dedicated disposal point was created on site, capped with 5 m of site derived soil.

3.5 Main Compound

3.5.1 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 in December 2020. Formation of the upper level, which will comprise a material laydown area, is nearing completion.

3.5.2 Observations

There were few significant changes to the main compound since the previous audit. The PMO noted that the main access route from the A970 to the Main Compound had been surfaced in asphalt. A number of bird nesting boxes were observed to have been installed on the upper level of the main compound (along the exposed rock cutting), and along the northern limit of the compound as shown on Photo 11 of Appendix 1. These boxes provide preferential nesting locations to plant (e.g. dump trucks) since bird nesting within parked vehicles is a common occurrence in Shetland and has the potential to result in vehicle fires.

3.6 Nesting

3.6.1 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 borrow pit NBP05 is continuing.

3.6.2 Observations

Track construction has progressed as far as turbine N137 on Spur 32 (refer to Photo 12 of Appendix 1). At the time of the audit, peat was being excavated and transported to peat restoration area P27. The PMO viewed culverts that had been constructed to divert drainage beneath the track. Water flowing into and out of the culvert was noted to be clear.

An excavator was observed progressing the removal of peat to allow the subsequent formation of the crane pad hardstanding for turbine location N132 (refer to Photo 13 of Appendix 1).

Progress at Spur 27 towards turbine location N122 was observed from Junction 28 as shown on Photo 14 of Appendix 1. Pre-construction surveys have been carried out along the route of Spur 26 to the south (towards turbine location N121) with the route cleared by the ECoW shown to be demarcated.

The PMO viewed the area at Spur 23 leading towards turbine location N115. Formation of the tracks had been completed in this area and an excavator was observed to be carrying out reinstatement work in this area.

The borrow pit NBP05 was observed; rock extraction continues in this area and preparations were underway for the next blast (refer to Photo 15 and 16 in Appendix 1). Extracted rock is used for the construction of tracks and crane pad hardstandings.

Peat restoration area P27 is located adjacent to NBP05 and restoration works are ongoing.

The aerial extent of NBP05 and P27 is shown on Photos 17 and 18 of Appendix 1.

3.7 Communication with Clerks of Work

3.7.1 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 prior to the site visit on 22nd April 2021.

The GCoW described 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. The GCoW highlighted the peat slip that occurred at Spur 4 of the Kergord Array, as referenced in Section 3.1.2 of this report.

Updated copies of the PRRs were provided to the PMO for review. Specific reference to the Kergord slip is included in Section 3.1.2. Review of the remaining PRRs for Arrays A, C, I, J and N confirmed that risk levels and mitigation measures were appropriately documented and that regular monitoring and updating of the registers is being undertaken by the Principal Contractors Engineer (Sweco).

3.7.2 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 prior to the site visit on 26th April 2021.

The ECoW confirmed that a monthly report had been prepared and this was submitted to the Developer following the audit, in accordance with the commitments in the CEMP.

The ECoW confirmed that there were no impacts to surface watercourses following the peat slip at CH2450 of Spur 4 at Kergord.

The pre-construction ecological surveys undertaken within the North Compound were described by the ECoW as previously outlined in Section 3.4.2.

It was reported that discussions are held regularly between the Developer, Principal Contractor and ECoW regarding nesting birds. In addition to nesting bird surveys undertaken by the ecology team, pre-construction checks are ongoing by the ECoW team and resources such as breeding bird maps for previous years are consulted in advance of these surveys to identify areas where there could be potential constraints so that consideration can be given to alternative scheduling of works as required.

3.7.3 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 prior to the site visit on 22nd April 2021.

The ACoW shared the GIS Trigger Map with the PMO which is the main database for recording observations and progress through 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:

- A full time watching brief was undertaken in the vicinity of turbine N132.
- A full time watching brief is being undertaken between N120 and N122 on Spur 27.
- A method statement has been drafted for investigation of the area at borrow pit NBP06, located at the south eastern extent of the site. Once the method statement has been finalised this will be submitted to SIC for approval.
- Daily monitoring checks are undertaken across the construction site.

3.8 Scope of next audit

The scope of the next PMO audit 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, North Compound 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.
- 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).	A peat slip occurred at CH2450 of Spur 4 at Kergord which resulted in temporarily stored turves sliding downslope. The peat risk register for this area had been completed prior to the slip and mitigation measures were implemented by the Principal Contractor. Slipped peat is in the process of being recovered and the measures to stabilise the slope have been undertaken.	No further actions required.	N/A	Green
Natural and Built Environment (e.g. ecology, biosecurity, protected sites, archaeology and site restoration).	Nesting bird surveys have commenced at the site. A method statement for the North Compound provided ot the PMO for review confirmed that personnel working in this area are briefed about the presence of invasive species. EcoW and AcoW monitoring is ongoing with regular liaison undertaken with the Developer and Principal Contractor.	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.	N/A	Green
Nuisance and Statutory Nuisance (e.g. noise and vibration, dust/air quality, litter).	Dust mitigation measures comprising perforated pipes, pumps and clean water supplies have been implemented at the Kergord Access Track and Sandwater Road for use during dry condtions. Monitoring of atmospheric conditions and work activites is undertaken regularly and mitigation measures used as required.	No further actions required.	N/A	Green

VIKING ENERGY WIND FARM

Issue	Auditor Comments	Required Action	Action Owner	Status
Resources, Waste and Transport.	Invasive (non-native) plant species were excavated at the North Compound prior to commencing construction works. The excavated plants were buried on site at a designated location in accordance with the method statement.	No action required.	N/A	Green
Pre-Planning Works (e.g. site set-up and general management, access tracks, community liaison).	Evidence of pre-planning works observed and reported during the audit included pre-construction surveys, nesting bird surveys, and preparation of method statement for formation of the North Compound.	No action required.	N/A	Green

APPENDIX 1 SITE LOCATION PLAN AND PHOTOLOG

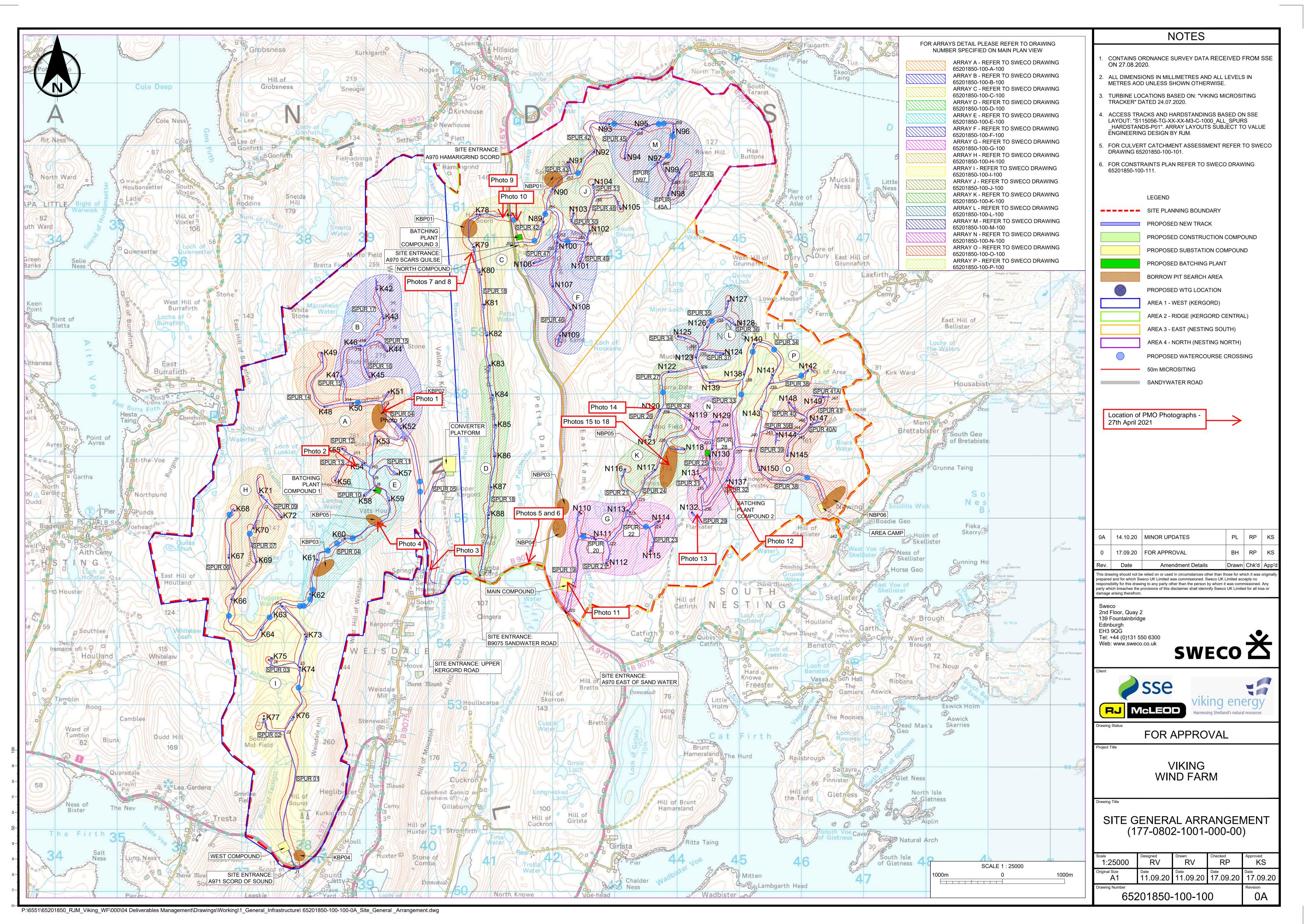






Photo 1. View of borrow pit KBP02



Photo 2. View of activity in peat restoration area P05 from crane pad hardstanding of K54.

Title:	Photographic Log	Viking	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	27 ^h April 2021





Photo 3. Perforated pipes along KAT for dust mitigation. Pump located in distance.



Photo 4. View of peat slip area at CH2450 of Spur 4 at Kergord. Recovery of peat and slope stabilisation in progress.

Title:	Photographic Log	Viking	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	27 ^h April 2021





Photo 5. Progress with construction of permanent bridge over the Burn of Pettawater



Photo 6. Dust mitigation measures ready for use as required along Sandwater Road

Title:	Photographic Log	Viking	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	27 ^h April 2021





Photo 7. View of peat restoration area P08 from K79 crane pad hardstanding



Photo 8. Turbine K79 excavation with peat restoration area P09 in the background.

Title:	Photographic Log	Viking	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	27 ^h April 2021





Photo 9. Excavation of rock at Hamarigrind Scord, being removed for use at the crane pad hardstanding for K78.



Access point for North Compound at the junction with the A970.

Photo 10. Excavators in the background are progressing construction of the North Compound platform.

Title:	Photographic Log	Viking	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	27 ^h April 2021





Photo 11. Example of bird nesting boxes that have been installed at the Main Compound.



Photo 12. Progress of track construction at Spur 32 towards N137.

Title:	Photographic Log	Viking	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	27 ^h April 2021





Photo 13. Excavation of peat at the location of N132 on Spur 32.



Photo 14. View of progress along Spur 27, viewed from Junction 28.

Title:	Photographic Log	Viking	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	27 ^h April 2021





Photo 15. Excavator progressing extraction of rock within borrow pit NBP05.



Photo 16. Drilling rig working in borrow pit NBP05, preparing for the next blast.

Title:	Photographic Log	Viking	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	27 ^h April 2021





Photo 17. Aerial view of peat restoration area P27.



Photo 18. Aerial view of peat restoration area P27 in the foreground, and borrow pit NBP05 in the background.

Title:	Photographic Log	Viking	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	27 ^h April 2021