Intended for

Viking Energy Wind Farm LLP

Date

November 2021

Project Number

1620009158

VIKING ENERGY WIND FARM PLANNING MONITORING OFFICER AUDIT REPORT 013: 21ST OCTOBER TO 12TH NOVEMBER 2021



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1. AUDIT DETAILS

1.1 Audit Details

Audit Number	PMO 013			
Location	Kergord			
	Sandwater Road			
	Mid Kame Ridge			
	North Compound and North Nesting			
	Main Construction Compound			
	Nesting			
	Substation			
Weather Conditions	Windy, mild, dry with showers (8°C).			
Audit Date	10 th November 2021			
Audit Period	21 st October to 12 th November 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.
- 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 Renewables Environmental Site Manager, and SIC Planning Enforcement Officer undertaken on 10th November 2021 which included the following locations:
 - Kergord;
 - Sandwater Road;
 - Mid Kame Ridge;
 - North Compound and North Nesting;
 - Main Compound;
 - Nesting; and
 - Substation.
- Discussions were held with the Geotechnical Clerk of Works (GCoW), Environmental Clerk of Works (ECoW) and Archaeological Clerk of Works (ACoW).

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	
RJ McLeod	Design 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 was accessed from the Sandwater track along the southern boundary of the central area of the development.

Activities in this area during the audit included progression of access tracks and peat restoration areas, rock extraction at borrow pits, formation of crane pad hardstanding areas, installation of steel cages and concrete pouring at turbine foundations.

3.1.2 Observations

Construction of track in the north of Kergord has been completed and excavation for K42 hardstanding has begun (Photo 1). Construction of track in the south of Kergord has just reached K76 and excavation for K76 hardstanding has begun. Following the dry summer and early autumn periods, rainfall has increased. In response to this, excavation of new turbine bases has stopped and work has focused on turbine bases already excavated and improvement work on built tracks. The installation of the anchor cage has been completed at K44, K46 - K48, K51, K52 and K54 - K60 (example shown in Photo 2); steel rebar has been installed at K46, K48, K52 and K55; concrete pouring has been completed at K52; with K46 being prepared for concrete pouring. At the time of visit, the shuttering at K48 was being lifted (Photo 3) and the steel fix had just begun at K57.

There was no work at KBP02 on the day of visit, rock extraction at KBP03 and KBP05 is still ongoing. Original bunding is still in place at the temporary peat storage area near KBP05 (Photo 4). The temporary peat storage area is compliant with the CEMP specifications and act as temporary storage before peat can be used for future reinstatement purposes. Phase 1 of the peat restoration at P04 and P05 has been completed (Photo 5) with ongoing restoration at P02. The peat reinstatement along tracks is ongoing, although there are sections where the reinstatement of turves is awaiting installation of cabling. Reinstatement of turves on the opposite side of track without cabling is ongoing and has been completed in some sections.

3.2 Sandwater Track

3.2.1 Site Setting and Activities

A track has been constructed at Sandwater, located at the southern limit of the central site area, which provides access to the Kergord and Mid Kame Ridge wind farm areas for all construction traffic. The new track is located adjacent to the existing Sandwater Road (B7095), which remains operational for public traffic. Landscaping has been completed on the south side of the western section of Sandwater Track. Landscaping has also been completed at a managed settlement pond to the north of the western section.

The Sandwater Loch is located 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.

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

3.2.2 Observations

Works on Pettawater bridge are ongoing to complete construction, with duct installed for cabling. Fencing around P8 and P9 has been completed.

3.3 Mid Kame Ridge

3.3.1 Site Setting and Activities

The Mid Kame Ridge (MKR) is accessed from the Sandwater track and stretches northwards to Hamarigrind Scord..

3.3.2 Observations

At the time of visit, there was no active work on MKR and hence no observations were made. Concrete pouring for all turbines along MKR has been completed with backfilling of the turbine base excavations scheduled for the coming month.

3.4 North Compound and North Nesting

3.4.1 Site Setting and Activities

The North Compound and northern Nesting turbine arrays are located towards the northern limit of the site on the eastern side of the A970. Track and bridge construction, track improvement, peat restoration, reinstatement and crane pad hardstanding formation was also being undertaken during the audit. At the North Compound batching plant 1 and 2 are in place.

3.4.2 Observations

At the time of visit, work was underway to remove a stockpile by North Compound to improve visibility at the access junction.

Construction of the temporary bridge between N95 and N96 (watercrossing 15) has been completed, allowing the construction of the permanent bridge and track towards N96 and beyond to begin. As a proactive approach to prevent water pollution and in anticipation of higher rainfall in coming months, settlement pond and silt traps have been installed by the temporary bridge and along tracks (example in Photo 6). Some splash guards are also in place (example in Photo 7), with more to be installed on all active bridges.

The PMO observed ongoing restoration at P11.

At the south of North Nesting, construction has progressed to N108 (Photo 8).

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. The lower level comprises car parking and site offices and welfare facilities. The upper level is in use for material and equipment laydown.

3.5.2 Observation

The car parking, site offices and welfare facilities are functioning well. All materials are stored according to regulations. No evidence of leaks or staining was observed in the vicinity of the COSHH store.

3.6 Nesting

3.6.1 Site Setting and Activities

The Nesting arrays are accessed from the A970. Activities in this area during the audit included progression of access tracks, bridges and peat restoration areas, rock extraction at borrow pits and formation of crane pad hardstanding areas.

3.6.2 Observations

The construction in the north of Nesting is ongoing at N127 and N128. In the east of Nesting, construction is ongoing at N149. The construction of the permanent bridge over the Burn of Forse (watercrossing 19, between N120 and N122) is ongoing.

On the day of the visit, there was drilling at NBP05 in preparation for blasting planned later on in the week and ongoing restoration at P22, P24, and near N148 (Photo 9). With higher rainfall and heavy construction traffic, reinstatement of the track surface are underway on tracks near borrow pits.

PMO observed the surface water management system installed near N132 where clean and dirty water are separated (Photo 10). Settlement ponds (Photo 11), silt traps and fencing are checked and maintained regularly. Once silt traps are full of silt, they will be cleared as soon as possible.

3.7 Substation

3.7.1 Site Setting and Activities

The Substation occupies the northern third of the HVDC Converter Station Platform located in the Kergord Valley, between Mid Kame Ridge and Kergord. Access to the Substation is taken via the KAT. Only the substation area is subject to the PMO audit. Activities in this area included excavation, foundation work for buildings within the Substation and construction of building frame of the main building.

3.7.2 Observations

Foundation work for buildings within the Substation is ongoing with frame of the main building being constructed on the day of visit (Photo 12). Construction is in its early stage and activities will be audited in more detail during the future visits.

3.8 Communication with Clerks of Work

3.8.1 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 discussion was held between the PMO and GCoW before the site visit, on the 4th November 2021.

The GCoW described the ongoing monitoring work across the site. This has included monitoring of the general construction works, monitoring peat restoration areas and providing advice on peat handling. The GCoW reported good working practices on peat restoration areas with ongoing supervision to ensure high standard throughout. The GCoW reported completion of routine inspection of geotechnical items, none of which resulted in environmental incident.

3.8.2 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 discussion was held between the PMO and ECoW before the site visit, on the 5^{th} November 2021.

The ECoW continues to work with the Principal Contractor to identify and implement mitigation measures ahead of construction. This includes pre construction surveys ahead of planned works, predicting ornithology constraints in the coming year to advise construction schedule and additional surveying of cable routes.

The ECoW noted dialogue has taken place with the Principal Contractor regarding best practices on turf reinstatement.

3.8.3 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. The ACoW communicated the ongoing works to the PMO on the 9th November 2021.

The ACoW described the ongoing and completed monitoring works across the site. In the Nesting Array, track excavation on Spur 26 (near N121), track excavation on Spur 46 (near N128) and hardstanding excavation at N149 have been completed with ongoing monitoring on Spur 30 (near N132).

In North Nesting monitoring has been completed at spur 48 to N105 with ongoing monitoring at spur 47 (near N106) and spur 45 (near N96).

In Kergord, most of the monitoring areas have been completed.

The ACoW has continued with daily checks across the project site and has completed surveying of cable routes and LiDAR masts.

3.9 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 North Nesting, Main 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.
- Update on the construction of the VEWF Substation and audit in more detail.
- 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).	Peat restoration areas are managed through the project Habitat Management Plan and by a dedicated HMPO which balances the geotechnical and ecological objectives of the restoration. Potential risks relating to storage of peat are recorded on the PRRs and communicated to the Principal Contractor to allow mitigation/monitoring to be undertaken. The PMO will request evidence in future audits to confirm compliance with requirements for GCOW and ECOW approval of proposed peat restoration areas. The project COSHH stores are typically used for the storage of maintenance oils and greases. The stores were all locked and the assessment for each substance was readily available in each store. The stores were bunded and no leaks or staining was observed around the stores.	No action required.	N/A	Green
Natural and Built Environment (e.g. ecology, biosecurity, protected sites, archaeology and site restoration).	Ecological constraints identifed by the ECoW team are communicated to the Principal contractor and Developer to allow mitigation measures to be implemented and rescheduling of preparatory and construction work as required. These are also marked out by poles on the site and included on ecological sensitive plans issued to the Principal contractor. Watching briefs have been undertaken by the AcoW where potential archaeolgical constraints are identifed. Where there are known archaelogical features the track is micro-sited to avoid the feature.	No action required.	N/A	Green

Issue	Auditor Comments	Required Action	Action Owner	Status
Pollution Prevention and Response (e.g. use of spill kits, silt control, cement/concrete, water resources).	The project has recieved authorisation to abstract water from eight locations from SEPA. The authorisation allows the water to be used for dust suppression. The PMO has reviewed documents confirming that the appropriate registration is in place with SEPA under The Water Environment (Controlled Activities) (Scotland) Regulations 2011, as amended. During the audit the PMO observed spill kits to be well stocked and readily available in areas where liquids are stored.	No action required.	N/A	Green
Noise, Dust, and Air Quality	No dust complaints had been received during the reporting period. Given the wet weather, dust suppression measures have not been required but effective measures are in place if required.	No additional actions required other than continued monitoring of dust conditions and implementation of control measures as needed; and ongoing liaison as required with other construction operators.	N/A	Green
Resources, Waste and Transport.	The project manages wastes through a Site Waste Management Plan, the plan identifies the contractors transferring the waste and the disposal sites. Documents are retained in line with regulatory requirements.	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 micro-siting of access tracks to account for constraints. Potential constraints are identified and suitable mitigation measures implemented to prevent negative impacts.	No action required.	N/A	Green

VIKING ENERGY WIND FARM

APPENDIX 1 SITE LOCATION PLAN AND PHOTOLOG

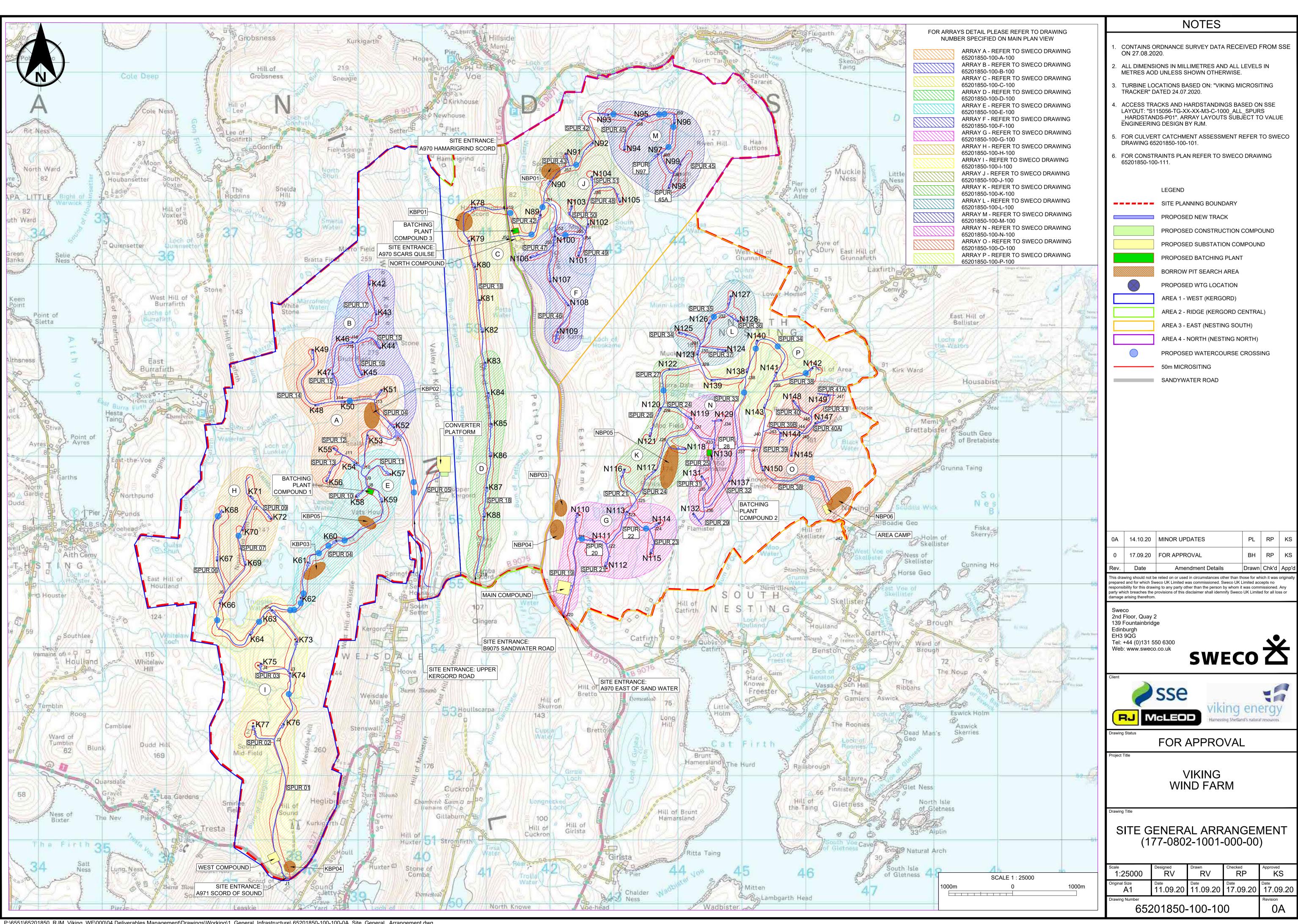






Photo 1. View of excavation for K42 hardstanding



Photo 2. Example installed central pillar over concrete blinding at K44, before steel fixing

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	10 th November 2021



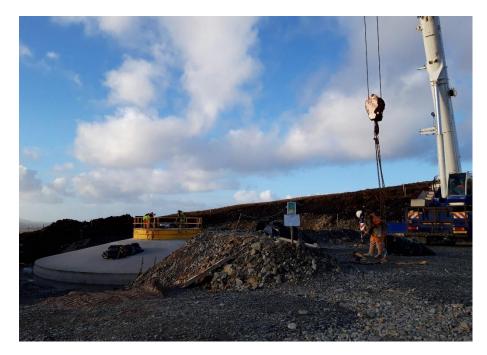


Photo 3. Shuttering being lifted at K48 after concrete pour



Photo 4. View of temporary peat storage area at KPB05

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	10 th November 2021





View towards P04 and P05 where phase 1 of the peat restoration has been completed



Photo 6. Settlement pond and silt trap next to temporary bridge by watercrossing 15

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	10 th November 2021





Photo 7. Splash guards installed on temporary bridge at watercrossing 15 and view towards tracks onto N96



Photo 8. View of ongoing construction at N108

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	10 th November 2021





Photo 9. View of ongoing peat restoration near N148



Photo 10. Example of dirty water system near N132

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	10 th November 2021





Photo 11. Example of track side settlement pond near N132



Photo 12. View towards substation under construction

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	10 th November 2021