

VIKING ENERGY WIND FARM PLANNING MONITORING OFFICER AUDIT REPORT 017: 19TH FEBRUARY 2022 TO 18TH MARCH 2022

Project Number 1620009158

Date March 2022

Intended for Viking Energy Wind Farm LLP

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1. AUDIT DETAILS

1.1 Audit Details

Audit Number	PMO 017			
Location	Kergord			
	Sandwater Road			
	Mid Kame Ridge			
	North Compound and North Nesting			
	Main Construction Compound			
	Nesting			
	Substation			
Weather Conditions	Dry and mild (6°C).			
Audit Date	17 th March 2022			
Audit Period	19 th February 2022 to 18 th March 2022			
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 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.

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.

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

 $^{^{1}}$ 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 Health and Safety Manager, RJM Design Management Engineer and SIC Planning Enforcement Officer undertaken on 17th March 2022 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 and formation of crane pad hardstanding areas.

3.1.2 Observations

The construction of tracks and bases has continued across the arrays with steelwork and concrete pouring ongoing. As noted in Report No.16, construction at K49 has taken a slower and more cautious approach to reduce risks with steep terrain and hence construction is still ongoing. Installed drainage measures are of good quality and preventative mitigation will continue to be installed as turbine base and hardstanding excavation continue. In the west, track construction has reached K72, with track construction on Spur06 (K67-K68) remaining. K71 turbine base excavation was ongoing during audit (Photo 1).

Steel rebar fixing has been completed at K50, 64, 66, 69, 70, 73 & 76 with concrete pouring completed at K42, 43, 45 & 62. During the audit, K50 was being prepared for concrete pour and shuttering was being removed at K45 after the concrete pour (Photo 2).

The majority of the patch repairs and infilling of holes on site tracks as noted in Report No.16 has been completed with less soft/ loose material observed on the surface.

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.

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.

3.2.2 Observations

The permanent Pettawater bridge is now operational and temporary bridge has been decommissioned and removed.

The PMO noted that bird diverters (known as 'CropGard') have been installed along the crosscountry underground cable route (Photo 3) to try and discourage ground nesting birds from the area which would be disturbed by construction works. There are three sections of cross-country underground cable route, the first from Array G across the A970 then follows the route of the

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

Sandwater Road; the second from K88 (MKR) to the substation; and finally from Array B to the substation. More bird diverters were being installed during the audit.

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

The cable laying activities planned to start in February 2022 has been rescheduled . Cable route excavation in preparation for the work has continued with the majority of cable route preparation completed on MKR (example Photo 4).

Turbine bases at K84, K85 and K86 have been backfilled.

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, 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

The Ground Investigation work observed in Report 015 has been completed and turbine foundation work continues. Turbine base and crane hardstanding areas have been excavated at N89, 103, 108 & 109. The Cable Duct trench at N90 was being constructed during audit (Photo 5).

At water crossing 15 (WC15), the permanent bridge construction has continued with the concrete abutment completed (Photo 6). Otter Crossing signs have been installed at both ends of the bridge. To exemplify good practice and inspire similar behaviours, the contractor that stopped work when otter activity was observed to reduce disturbance has been acknowledged internally with an environmental award.

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 Observations

To facilitate the Viking Community Hub at the end of the car park at the Main Compound, a painting showing size of a turbine blade has been completed on car park grounds.

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, cable trench excavation, rock extraction at borrow pits and formation of crane pad hardstanding areas.

3.6.2 Observations

In preparation for cable laying activities in Nesting, cable drums and "Win-Dust" (fine gravel for cable bedding) have been stockpiled along the route. Cable routes are being excavated, starting with Spur 21, 24, 30 & 38. The PMO observed cable trench excavation at N132 (Photo 7) and completed cable trench awaiting cable laying activities (example Photo 8). As a pollution prevention and preventative mitigation, drainage systems have been installed along cable trenches. Drains are installed at low points of the trenches (Photo 9), allowing water to flow into sumps which act as settlement ponds (Photo 10). The sumps are checked and maintained regularly.

Preparation work has begun at N112 for creating a show base for visitors.

The active peat restoration was observed at P25 (near N130) on the day of visit (Photo 11).

A new security barrier has been installed and is operational between the Main Compound and Nesting. All new security barriers are powered by solar power. Installation of the security barriers for the rest of the site is 95% complete and will be installed at the entrance and exit of all arrays.

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

The substation site was not accessed during the audit, however progress was discussed while overlooking the area (Photo 12). Roof cladding works have been completed on two buildings within the substation and is ongoing on the third. For the remaining three buildings, the ring beam has been completed on two with secondary steelwork completed on the third.

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 10th March 2022.

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 monitoring did not identify any events resulting in environmental incidents. There is ongoing supervision throughout the site with the GCoW working with the Principal Contractor to implement preventative measures, especially in areas of steeper terrain.

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 14th March 2022.

The ECoW continues to work with the Principal Contractor to identify and implement mitigation measures throughout different stages of construction. The measures aim to ensure the project maintains compliance with relevent licences. The ECoW is monitoring the progress of these measures on an ongoing basis. The ECoW reported no incidents with ecological impacts.

In preparation for the breeding bird season, preventive mitigation, e.g. crop guard bird diverters and nest boxes are being installed. The ECoW is working closely with the Principal Contractor to ensure that construction works have a minimal impact on breeding birds.

The ECoW has continued with regular checks across the project site.

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 10th March 2022.

The ACoW described the ongoing and completed monitoring works across the site. In Nesting North the monitoring of N107 and 109 has been completed.

In the Nesting South array there is ongoing monitoring for the cable trench excavation at N131 N132; at N121 N122 and between N138-N141.

In MKR, monitoring for most of the cable trench excavation has been completed with K87 and K88 ongoing.

In the Kergord array there are no ongoing monitoring works with the excavation of Spur 6 remaining.

The ACoW is drafting a revised Written Scheme of Investigation to account for the revised and approved cross-country cable routes. The ACoW noted dialogue is ongoing with the Environmental Advisor regarding the level of monitoring required for the cable trench works and the cross-country cable routes.

The ACoW has continued with daily checks across the project site.

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.

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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 Principal Contractor	Principal Contractor	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	

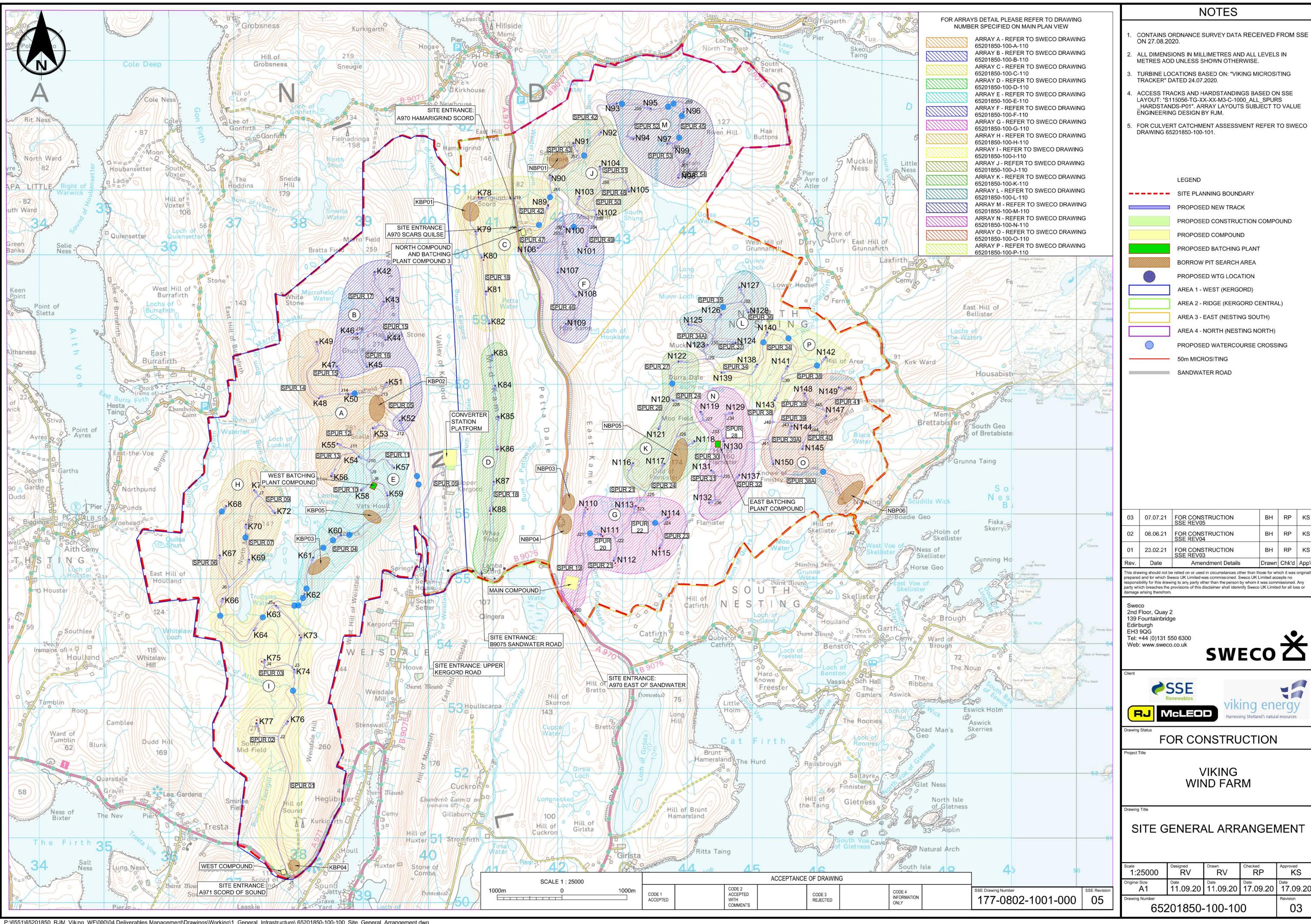
VIKING ENERGY WIND FARM

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. The project continues to improve the pollution prevention measures with additional measures installed in high risk area. PMO observed effective measures in place including but not limited to cut off drains, settlement ponds, silt controls, track side ditches and water pump reactor.	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

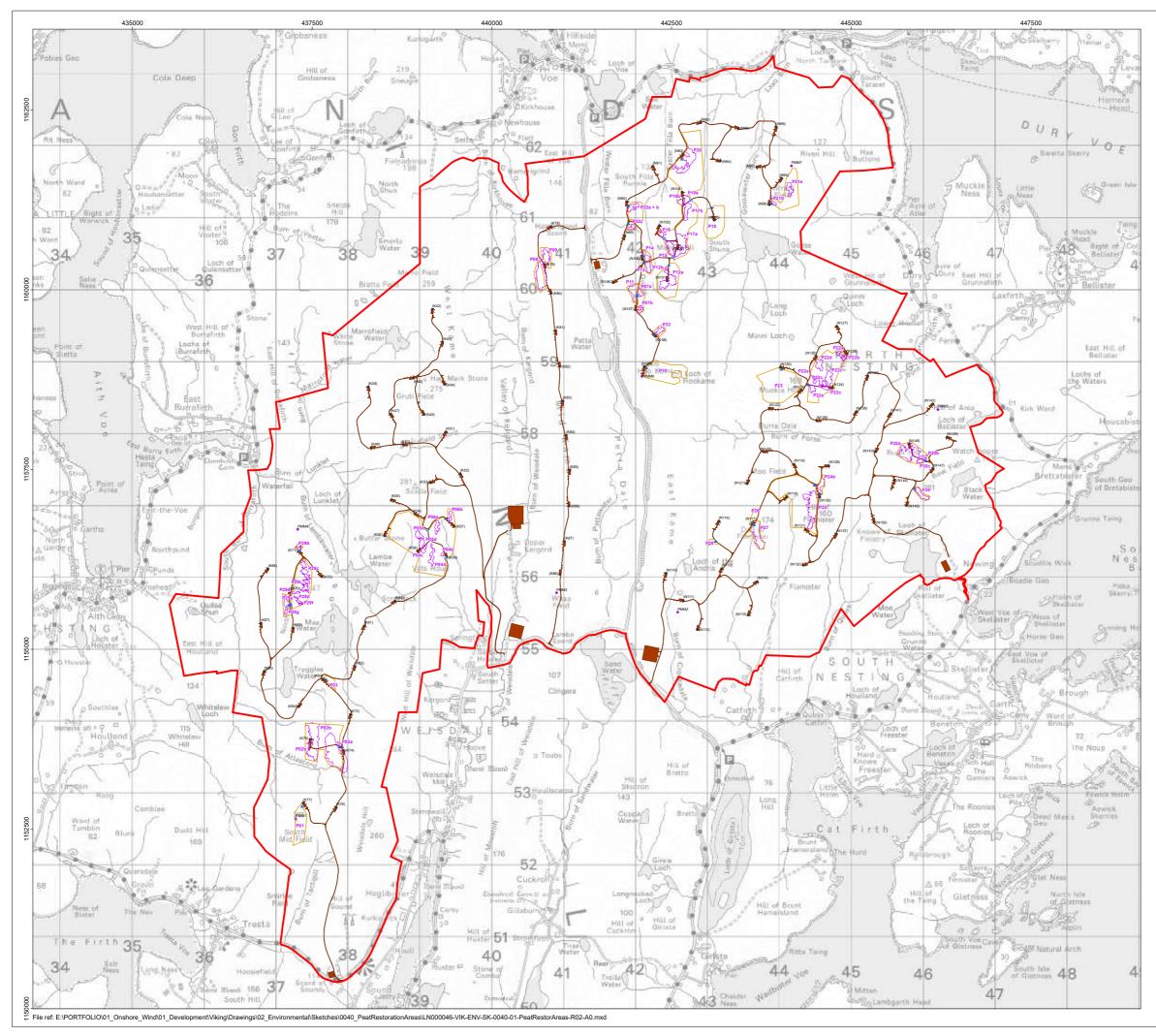
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Issue	Auditor Comments	Required Action	Action Owner	Status
Pre-Planning Works (e.g. site set-up and general management, access tracks, community liaison).	Evidence of pre-planning works observed and reported during the audit included pre- construction 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

APPENDIX 1 SITE LOCATION PLAN, PEAT RESTORATION PLAN AND PHOTOLOG



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Note Note	Turk Per Indi Indi Fen HM Mici	Boundary bine manent Met Mast cative Cattle Grid Location cative Gate Lo	d acc	ess.			
1 10,0		KING ENERGY WIND FARM					
Draw	ing Title						
		PEAT RESTORATION					
Rev	Date	Remarks	Drwn	Chkd			
R0	23/02/2021	First Issue	TD	EM			
R1 R2	12/01/2022 04/02/2022	Revised HMP Fencing boundary changes, gates and cattle grids added	AM AM	DM DM			
				2.11			
Draw	ving Number						
	LN000046-VIK-ENV-SK-0040-01						
Scale	1:18,			BNG			
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Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	17 th March 2022





Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	17 th March 2022





Photo 6. Permanent bridge construction in progress at WC15

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	17 th March 2022





Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	17 th March 2022



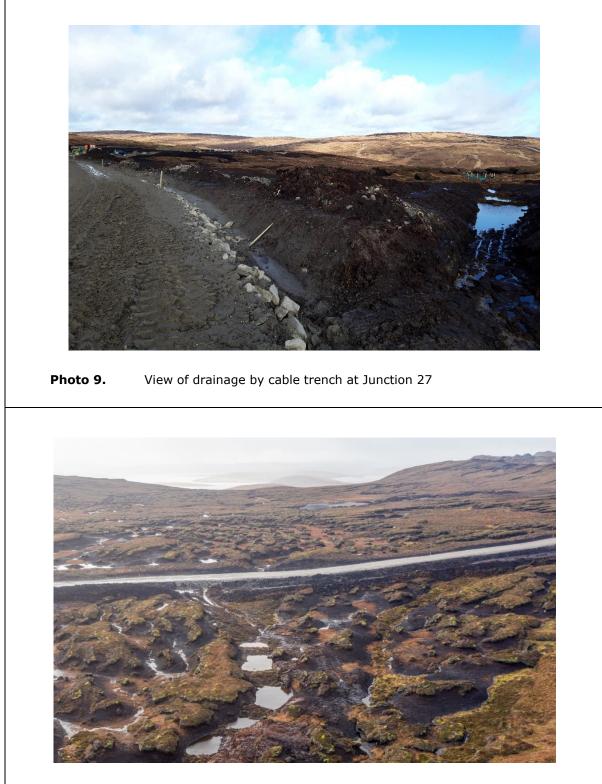
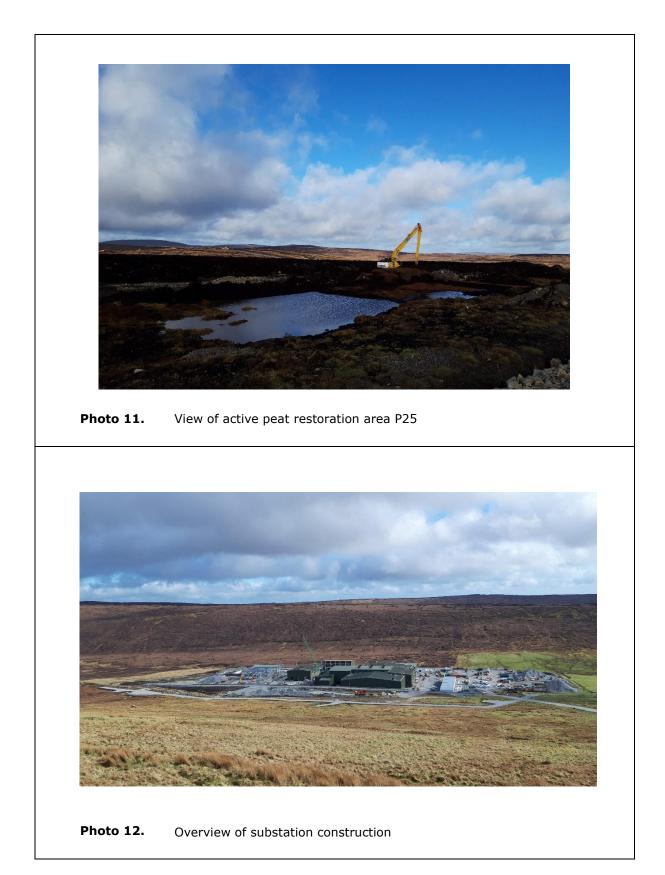


Photo 10. Aerial view of cable trench drainage (provided by RJ McLeod)

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	17 th March 2022





Title:	Photographic Log	Client:	Viking Energy Wind Farm
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