Intended for

Viking Energy Wind Farm LLP

Date

April 2022

Project Number

1620009158

VIKING ENERGY WIND FARM PLANNING MONITORING OFFICER AUDIT REPORT 018: 19TH MARCH 2022 TO 15TH APRIL 2022



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1. AUDIT DETAILS

1.1 Audit Details

Audit Number	PMO 018				
Location	Kergord				
	Sandwater Road				
	Mid Kame Ridge				
	North Compound				
	North Nesting				
	Main Construction Compound				
	Nesting				
	Substation				
Weather Conditions	Windy, Dry with light showers (6°C).				
Audit Date	13 th April 2022				
Audit Period	19 th March 2022 to 15 th April 2022				
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.

 $^{^{\}rm 1}$ 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

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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 dirt transferred via truck wheels on public roads and the use of the B9075.
- 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 13th April 2022 which included the following locations:
 - Kergord;
 - Sandwater Road;
 - Mid Kame Ridge;
 - North Compound;
 - 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. Installed drainage measures are of good quality and preventative mitigation will continue to be installed as turbine base and hardstanding excavation continue. Additional bund support is being added between the blade fingers of K51 (Photo 1) and additional culvert installed as preventative mitigation (Photo 2).

Steel rebar fixing has been completed at K75 and K77 with concrete pouring completed at K50, K63, K64, K66, K69, K70, K73 and K75. The PMO observed shuttering being removed at K75 (Photo 3) after concrete pour and backfill preparation at K52.

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 (B9075), which remains operational for public traffic until handover of the New Sandwater Road at project end.

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

No new observations on Sandwater Track to be reported.

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.

Cable trench excavation was being undertaken during the audit.

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

3.3.2 Observations

Cable trench excavation on MKR including landscaping and drainage installation (Photo 4) ongoing in preparation for cable laying activities planned for the end of the month. Cable drums and "Whin-Dust" (fine gravel for cable bedding) have been stockpiled along the route.

All turbine bases at MKR have been backfilled. Junction 18, entrance to MKR from Sandwater Road has been widened, as per approved plans.

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. At the North Compound batching plant 1 and 2 are in place.

3.4.2 Observations

The PMO visited the North Compound during the audit.

The fuel storage at the compound was noted to be in good order, with spill kit provided.

On inspection of the waste skips in the North Compound, it was noted that there was no consistency in labelling of the skips. One of the skips was labelled on the front, one was labelled on the back and one was without a label (Photo 5). Wood was also left on the floor by the skips (Photo 6). The Developer and PMO both agreed that a wood waste skip would need to be provided.

3.5 North Nesting

3.5.1 Site Setting and Activities

The 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, crane pad hardstanding formation and cable trench excavation were being undertaken during the audit.

3.5.2 Observations

Turbine base of N93 was being excavated during the audit. Steel rebar fixing has been completed at N91, N92 and N102.

At water crossing 15 (WC15), the permanent bridge construction has continued with the steel base installed (Photo 7).

The deposition of peat to area P17 (Phase 1) has been completed (Photo 8) and is being reviewed by the ECoW and GCoW to identify any ecological, drainage or stability issues that are required before Phase 2 and seeding works commence.

3.6 Main Compound

3.6.1 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.

3.6.2 Observations

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 store. All waste skips are clearly labelled (Photo 9).

3.7 Nesting

3.7.1 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.

3.7.2 Observations

Steel rebar fixing has been completed at N112, N113, N114, N115 and N117.

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

Cable trench excavations are ongoing in Nesting in preparation for cable laying activities. The Principal Contractor is ensuring that permanent drainage is installed prior to the laying of cables and while doing so ensuring that temporary drainage for the open cable trenches does not impact on the permanent systems being installed. N137 was noted as a positive example. The PMO observed that the track side reinstatement near N137 is in good condition (Photo 10). The clean water system installed is also in good condition, with large rocks used to reinforce the stability of the clean water inlet (Photo 12) and outfall channel and silt traps also in good condition.

A sympathetic programme of bird nesting deterrents to allow works to progress in parallel with the breeding birds have been implemented. The deterrents are installed in strategic areas so that prospecting birds avoid construction areas in favour of less active areas (example in Photo 12) so enhancing their chances of breeding, and minimising their impact on construction progress.

3.8 Substation

3.8.1 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 construction of building frame, cladding and pre-cast equipment foundations.

3.8.2 Observations

Roof cladding works have been completed on three buildings with wall cladding nearly complete on one of the three (Photo 13). For the remaining three buildings within the substation, secondary steelworks are ongoing for two of the buildings and pre-cast wall are being poured for the final building.

Bird diverters are also installed in the substation in preparation for the breeding bird season. Nets are used to cover the opening of pipes stored in the substation area to prevent birds entering.

The fuel storage at the substation was noted to be in good order, with spill kit provided (Photo 14). The waste skips at the substation are mostly well labelled with one skip without a label (Photo 15).

3.9 Communication with SIC

As described in Section 2.2, SIC advised the PMO of a public complaint that had been received regarding dirt transferred via truck wheels on public road and the use of B9075.

The Developer and Principal Contractor confirmed that wheel washing facilities are provided at the Main Compound (Photo 16) and wash bay is provided at the North Compound on cement pouring days. The Developer reassured that the A970 is constantly monitored and where required the road sweeper is deployed. The Principal Contractor noted that the road sweeper has been recently serviced and is in good working condition.

The Developer noted that the use of B9075 between Kergord and Weisdale, which runs through Setter, is permitted in any vehicles under 3.5t. While on work business, the Sandwater Track should be used by commercial vehicles involved in the construction of the windfarm and substation.

The Developer has provided detailed response to SIC which will then be communicated to the relevant parties.

3.9.1 Desk-based Audit

SIC has requested the PMO to check the Developer's compliance with the terms of approvals given under Condition 8 and Condition 13 of the deemed planning permission.

The PMO has completed a desk-based audit of the following documents:

- Borrow Pit Management Plan (including handling of overburden; drainage measures; Ground Investigation Summary; General GWDTE Protection measures; Programme of implementation and reinstatement);
- Borrow Pit Method Statement;
- Written approval from SIC on the discharge of Condition 8 (Borrow Pit Working Scheme);
- Blasting Schedule;
- Blasting Report (including vibration monitoring); and
- Written approval from SIC on blasting delays.

The Principal Contractor confirmed that there are active works in KBP02, KBP03, KBP05, NBP01 and NBP05.

Following the desk-based audit, the PMO is satisfied that the Developer has complied with the terms of approvals given under Condition 8 and Condition 13 of the deemed planning permission to date and have received confirmation from SIC that Condition 8 has been discharged.

3.10 Communication with Clerks of Work

3.10.1 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 April 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 ECoW to perform snagging on completed peat restoration areas.

3.10.2 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 6th April 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 relevant 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 is also working with GCoW to perform snagging on completed peat restoration areas.

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

3.10.3 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 6th April 2022.

The ACoW described the ongoing and completed monitoring works across the site. The majority of the ongoing monitoring are in Nesting with the cabling works. The ACoW also completes daily checks in North Nesting and Kergord but cable trench monitoring is not required yet as works have not commenced in the area.

The revised Written Scheme of Investigation to account for the requirements for watching briefs during cable trench excavations prepared by the ACOW is currently with the Shetland Regional Archaeologist for review. This revision was carried out in conjunction with Site Environmental Manager to ensure the provision of resources are coordinated with the Principal Contractors' programme of works..

The ACoW noted dialogue with the Environmental Advisor regarding the level of monitoring required for the cable trench works and the cross-country cable routes has completed and are in agreement.

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

3.11 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	Principal Contractor	Green
Materials Storage and Handling (e.g. oil/fuel storage and peat/mineral soil storage and handling).	PMO observed non-compliance with waste management plan. A wood waste skip is required at the North Compound and clearer and more consistent labelling of skips are required in North Compound and Substation.	Move materials to approved storage location and provide clearer labelling	Principal Contractor	Amber
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.	No action required.	N/A	Green

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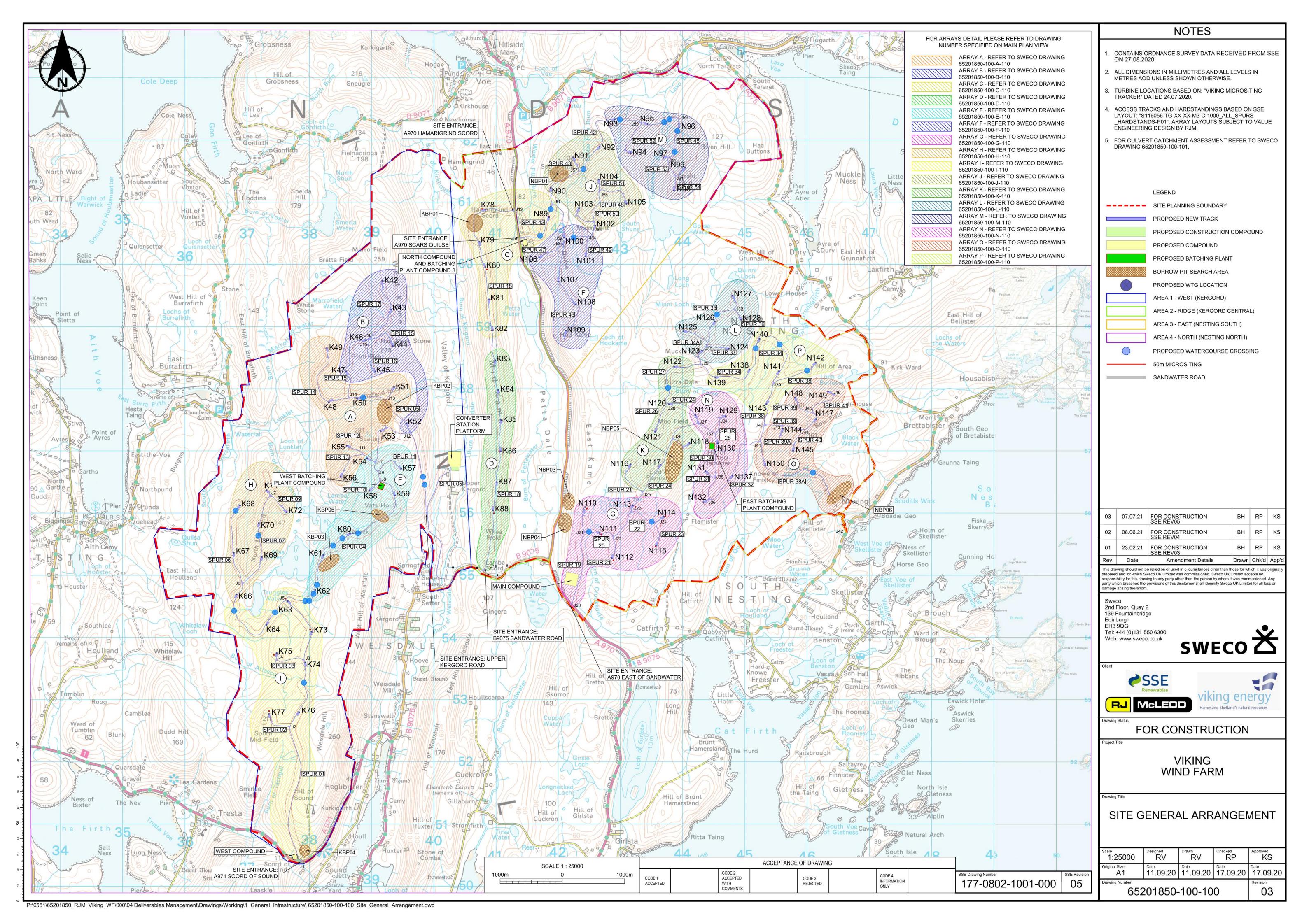
Issue	Auditor Comments	Required Action	Action Owner	Status
	Watching briefs have been undertaken by the AcoW where potential archaeolgical constraints are identified. Where there are known archaelogical features the track is micro-sited to avoid the feature.			
Pollution Prevention and Response (e.g. 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	No action required.	N/A	Green

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Issue	Auditor Comments	Required Action	Action Owner	Status
	disposal sites. Documents are retained in line with regulatory requirements.			
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

PLANNING N	MONITORING	OFFICER	AUDIT	REPORT	018:	19th	March	2022	То	15th	April	2022
VIKING ENE	RGY WIND FA	ARM										

APPENDIX 1
SITE LOCATION PLAN, PEAT RESTORATION PLAN AND PHOTOLOG



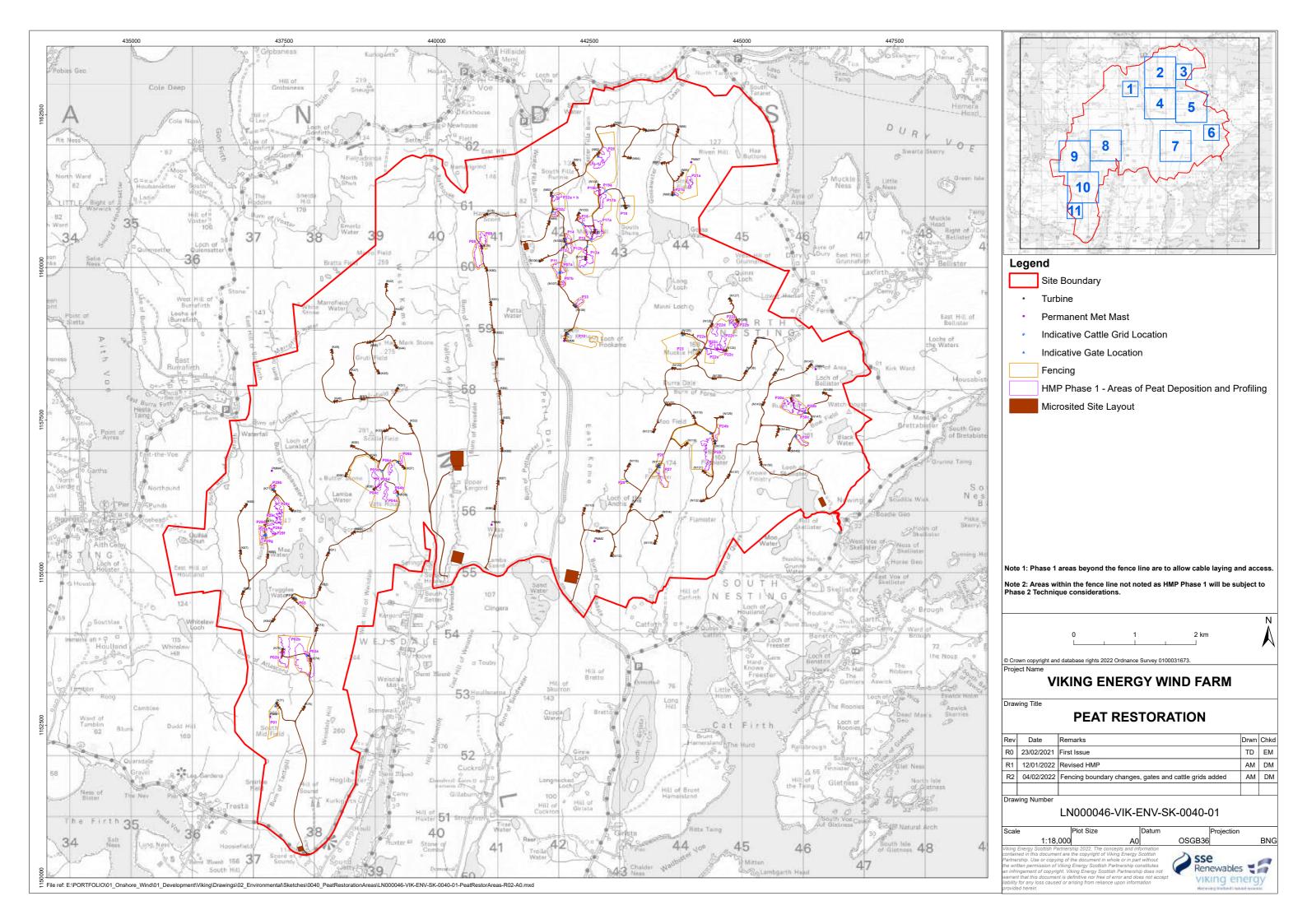






Photo 1. Additional bund support between K51 blade fingers.



Photo 2. Additional culvert installed at K51

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	13 th April 2022





Photo 3. View of shutter removal in progress at K75



Photo 4. View of cable trench drainage at K85

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	13 th April 2022





Photo 5. Inconsistent waste skip labelling at North Compound



Photo 6. Wood waste between pipe storage by waste skip at North Compound

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	13 th April 2022





Photo 7. Permanent bridge steel base installation at WC15



Photo 8. View of Peat Restoration Area P17a

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	13 th April 2022





Photo 9. Clear waste skip labelling at Main Compound



Photo 10. Track side reinstatement near N137 in good condition

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	13 th April 2022





Photo 11. Inlet of clean water system at N137



Photo 12. New bird diverter, 'Bird Scarer Kite' installed along tracks

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	13 th April 2022





Photo 13. Completed roof cladding on two of the buildings in the substation area



Photo 14. Fuel storage at substation with spill kit

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	13 th April 2022





Photo 15. Missing Skip Label (on the right) at substation



Photo 16. Washing facilities provided at the Main Compound

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	13 th April 2022