Intended for Viking Energy Wind Farm LLP

Date November 2022

Project Number 1620009158

VIKING ENERGY WIND FARM PLANNING MONITORING OFFICER AUDIT REPORT 025: 24TH OCTOBER TO 20TH NOVEMBER 2022



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1. AUDIT DETAILS

1.1 Audit Details

Audit Number	PMO 025			
Location	Kergord			
	Mid Kame Ridge			
	Main Construction Compound			
	Nesting			
	North Nesting			
	North Compound			
	Substation			
Weather Conditions	Wet and very windy (9°C).			
Audit Date	16 th November 2022			
Audit Period	24 th October to 20 th November 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

 $^{^{\}rm 2}$ 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 (if any).
- 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, RJM Environmental Clerk of Works and SIC Planning Enforcement Officer undertaken on 16th of November 2022 which included the following locations:
 - Kergord;
 - Sandwater track;
 - Main Compound;
 - Nesting; and
 - North Nesting.
- 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	Site Environmental Manager	
RJ McLeod	Design Engineer	
Tony Gee and Partners	Geotechnical Clerk of Works	
МВЕС	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 and backfilling of cable trenches, formation of turbine hardstanding, rock extraction at borrow pits and conversion of KBP05 to laydown area for turbine components.

3.1.2 Observations

All construction of turbine bases has been completed in this area, formation of turbine hardstanding areas are ongoing, with blade finger construction noted at K73 during visit.

During the visit, KBP05 was being cleared in preparation for Vestas in 2023. Proposed Vestas compounds are at KBP05 and the North Compound.

In response to periods of heavy rainfall and prevention of silty water events, a water pump with reactor is being used between K61 and K62 on settlement ponds by Maa Water (Photo 1). The reactor accelerates sediment separation and usage has been approved by SEPA. Water from the water pump reactor is then released into another settlement pond and then multiple layers of silt fencing (Photo 2).

During the visit, tracks between K61 and K62 are being widened in preparation for turbine delivery (Photo 3). Following widening of tracks, culverts in this section will also be extended.

3.2 Mid Kame Ridge and Sandwater Track

3.2.1 Site Setting and Activities

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

Work was suspended on MKR on the day of visit due to high wind speeds. Activities on Sandwater track includes temporary peat storage.

3.2.2 Observations

The excavation of the cross-country cable route from K88 to the substation, including the crossing of the Burn of Weisdale has been completed (Photo 4). Following the heavy rainfall events reported in PMO024, further mitigation has been installed. Mitigation includes drainage grips, settlement sumps/ ponds, installation of additional silt fences and clean water cut off ditches (Photo 5). There has been no repeat of this incident.

The Burn of Weisdale diversion is ongoing and should be completed before next visit (Photo 6). An additional duct is to be installed for cabling which will avoid future disturbance of ground and additional overhead lines. The final drainage on Sandwater track has been installed according to the final design specifications (Photo 7).

A temporary peat storage has been established on the Sandwater track and has been bunded appropriately (Photo 8).

3.3 North Compound

3.3.1 Site Setting and Activities

The North Compound is located towards the northern limit of the site on the eastern side of the A970. Concrete batching plant 1 and 2 are in place at the North Compound. North Compound is being prepared for demobilised as concrete batching has been completed.

3.3.2 Observations

The North Compound was not accessed during this PMO visit due to high volume of traffic movements as the area is being prepared for demobilisation.

3.4 North Nesting

3.4.1 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. Activities in this area during the audit included progression and backfilling of cable trenches, peat restoration areas, the backfill of turbine bases and formation of turbine hardstandings.

3.4.2 Observations

N99 turbine base has been backfilled. Backfilled turbine bases are being prepared for turbine erection activities and drainage amended, where required, to the permanent design requirements (example Photo 9). Backfilling of cable trenches is being carried out in some areas where this is possible and has been observed during visit (Photo 10).

Following the report on Spur 52 in PMO024, additional drainage has been installed (Photo 11).

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

The car parking, site offices and welfare facilities are functioning well. All materials (including materials on the upper level) are stored according to regulations. No evidence of leaks or staining was observed in the vicinity of the store. All waste skips are labelled.

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 and backfilling of cable trench excavations, rock extraction at borrow pit and formation of turbine hardstandings.

3.6.2 Observations

The last of the turbine bases have been poured at N150 (Photo 12). Turbine bases at N110, N112, N118, N121, N123-127, N129 and N142 have been backfilled and geotechnical testing completed.

Previously reported cable issues continue to delay the backfilling of some cable trenches. Backfilling of cable trenches, where the cables are not being affected by delays, has commenced and work is continuing. The backfilling of cable trenches by N118 was observed during the site visit (Photo 13). Following hydroseeding activities, early growth can be seen along the cuttings adjacent to the access tracks.

Cracking of the edge of the hardstanding surface at N114 noted (Photo 14). This is included in the project geotechnical risk register and is being monitored while the cause is being investigated.

It was noted by the GCoW prior to the site visit that there had been slumping peat in the area following a period of heavy rainfall (example Photo 15). Occurrence of slumping peat has been restricted to sloped reinstatement areas. There are no significant environmental impacts as a result of the peat slumps. The Design Engineer noted that drainage surrounding areas of peat slumps will be assessed and added where required.

The laying of cable ducts under the A970 as reported in PMO023 and PMO024 has been completed and the road has been reinstated. The restoration of temporary road used during construction was observed during the visit (Photo 16).

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.

3.7.2 Observations

The substation was not visited during this PMO audit due to high wind speeds.

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 and after the site visit, on the 10th and 14th of November 2022.

The GCoW described the ongoing monitoring work across the site. This has included monitoring of the general construction works including cable routes, monitoring peat restoration areas, included new temporary areas and providing advice on peat handling.

The GCoW mentioned observations of peat slumps and required clarification on the plans for the reinstatement of these areas. The Design Engineer clarified that the areas would be reinstated and drainage would be modified to divert surface water flow. The peat slumps did not have any significant environmental impacts. These areas are mentioned in Section 3 above.

As reported in Section 3.6.2, the GCoW is monitoring the crack at the edge of the hardstanding surface at N114 and .

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 10th November 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 has expressed concerns, concerns shared by many parties, on the continuation of open cable trenches and the delays in backfilling.

The ECoW continues to monitor the additional mitigation installed following the silty water event in the Burn of Weisdale as reported in PMO024.

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 7th November 2022.

The ACoW described the ongoing and completed monitoring works across the site. Ongoing works mostly related to cabling work.

The ACoW had discussions with the Principal Contractor and the Design Engineer and updated communication procedures.

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

3.9 Communication between SSE Renewables Environmental Manager and SEPA

Following the exceedance as reported in PMO024, PMO has confirmed the engagement between VEWF and SEPA and that responsible reporting has been undertaken. A Public Statement has also been released by SSE. Following the date of PMO audit visit, response from SEPA has been received.

3.10 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 cable track areas.
- Update on the construction of the VEWF Substation and undertake PMO audit of the substation area.
- Updates from the ACoW, ECoW and GCoW teams.

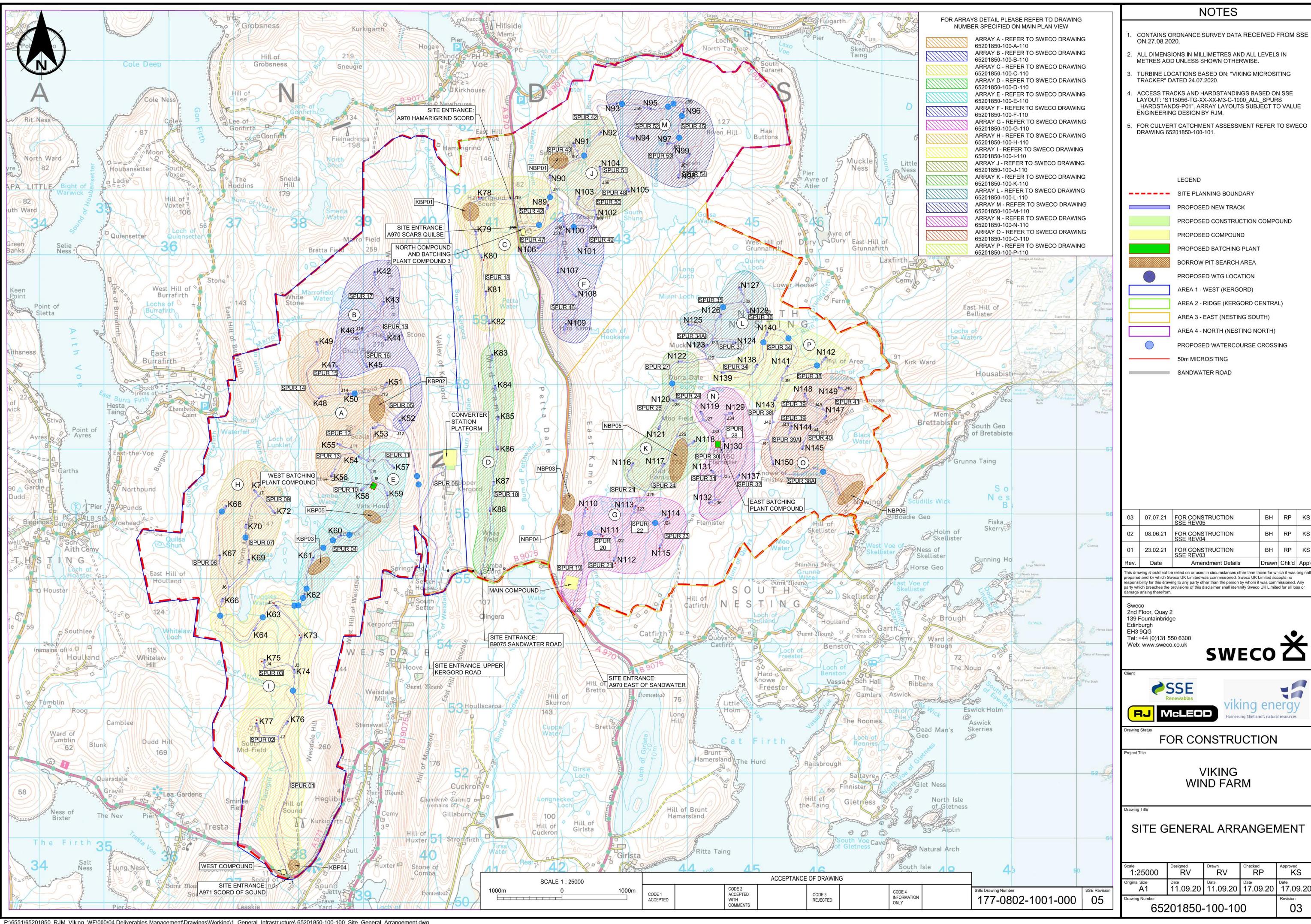
4. AUDIT FINDINGS AND REQUIRED ACTIONS

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
Natural and Built Environment (e.g. ecology, biosecurity, protected sites, archaeology and site restoration).	Ecological constraints identified 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 archaeological constraints are identified. Where there are known archaeological features the track is micro-sited to avoid the feature.	No action required.	N/A	Green

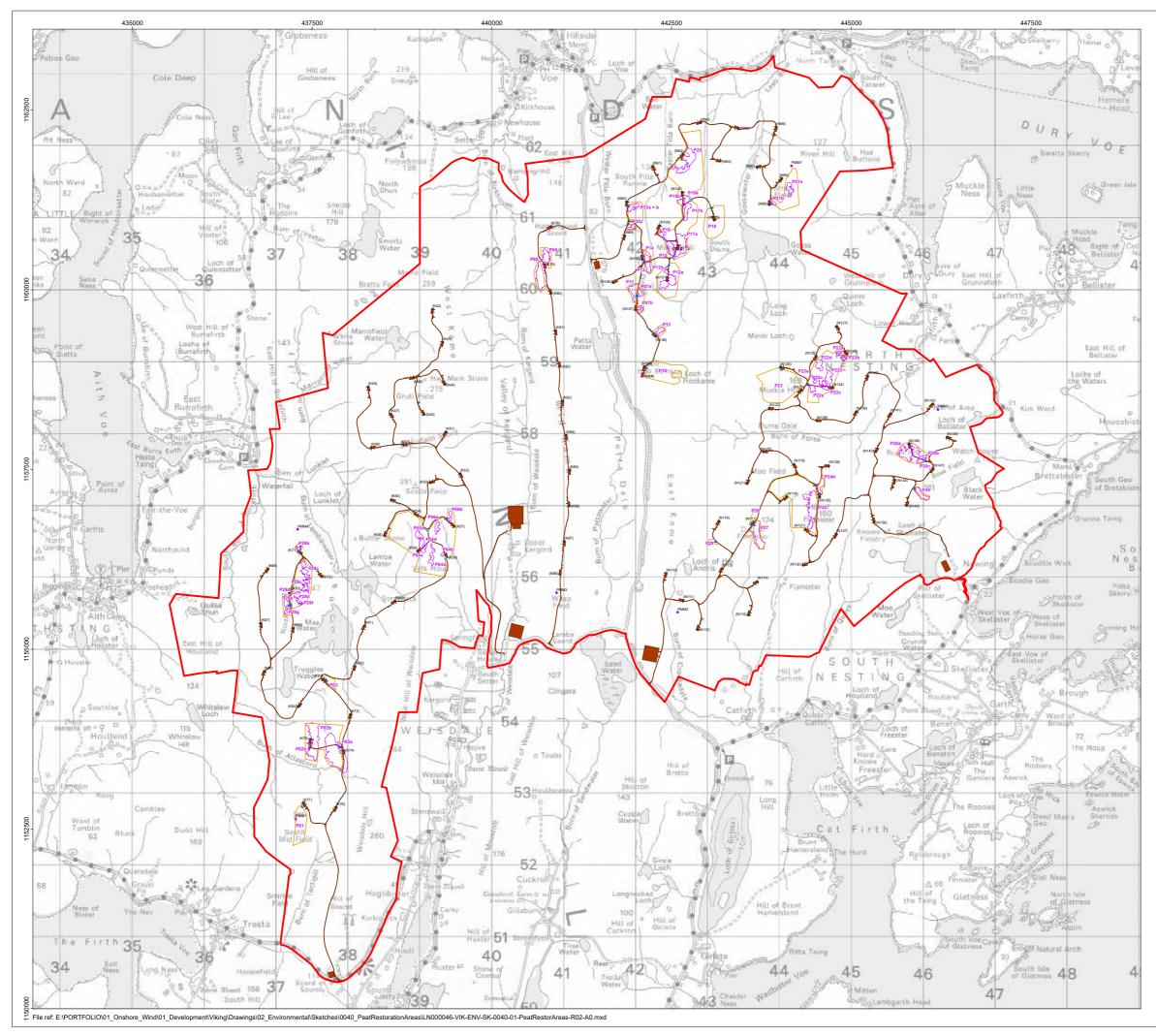
Issue	Auditor Comments	Required Action	Action Owner	Status
Pollution Prevention and Response (e.g. use of spill kits, silt control, cement/concrete, water resources).	The project has received authorisation to abstract water from eight locations from SEPA. The authorisation allows the water to be used 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.	No action required.	N/A	Green
	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 areas. 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.			
Pollution Prevention and Response (e.g. use of spill kits, silt control, cement/concrete, water resources).	Silty water has been observed being discharged for a short time into watercourses during period of heavy rainfall. This was discreet, rare, short- lived and do not exceed reportable thresholds The levels of sediment in the water have not exceeded the permitted levels. Further mitigation has been put in place in the areas of concern.	No action required. Field testing for suspended solids determines whether further action and/or external reporting is required.	N/A	Green
Pollution Prevention and Response (e.g. use of spill kits, silt control, cement/concrete, water resources).	The SSE Renewables Environmental Manager notified the PMO that there have been some exceedances of Environmental Quality Standards of some trace metals in water quality sampling in the Burn of Lunklet.	Investigation into the source of the trace metals is ongoing. PMO has confirmed the engagement between VEWF and SEPA and response from SEPA has been received following the date of PMO audit visit.	Principal Contractor	Amber

Issue	Auditor Comments	Required Action	Action Owner	Status
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 archaeological watching brief, community liaison. 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

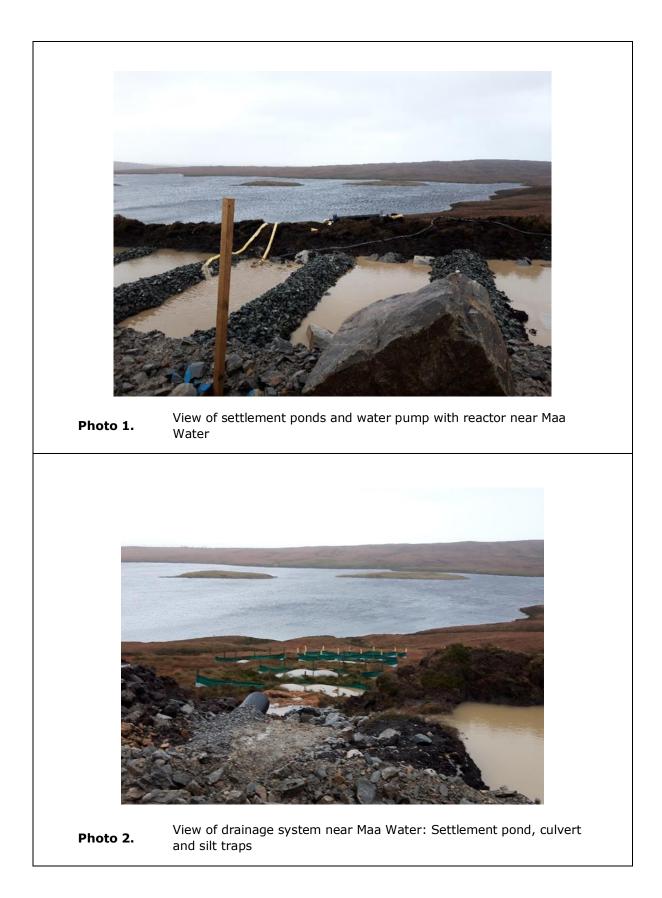


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Note Note	Turk Per Indi Indi Fen HM Mici	Boundary bine manent Met Mast cative Cattle Grid Location cative Gate Lo	d acc	ess.			
1 10,0		KING ENERGY WIND FARM					
Draw	ing Title						
		PEAT RESTORATION					
Rev	Date	Remarks	Drwn	Chkd			
R0	23/02/2021	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					
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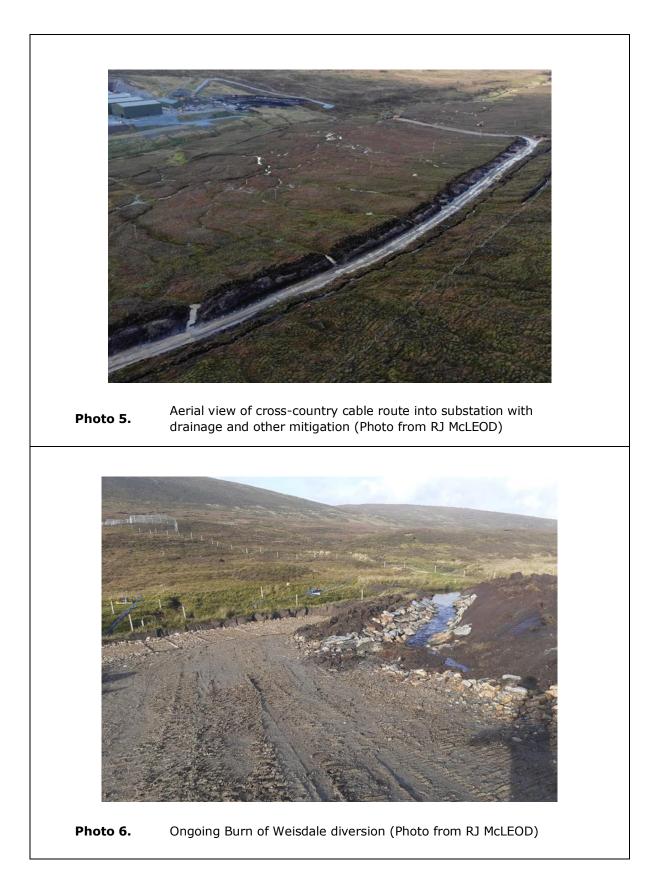
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Site:	Viking Energy Wind Farm	Date:	16 th November 2022





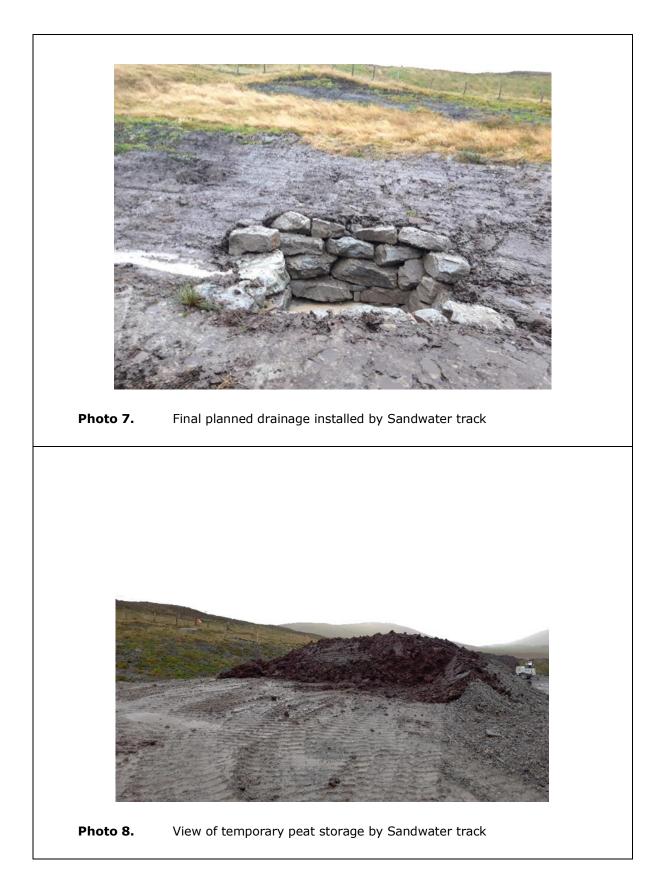
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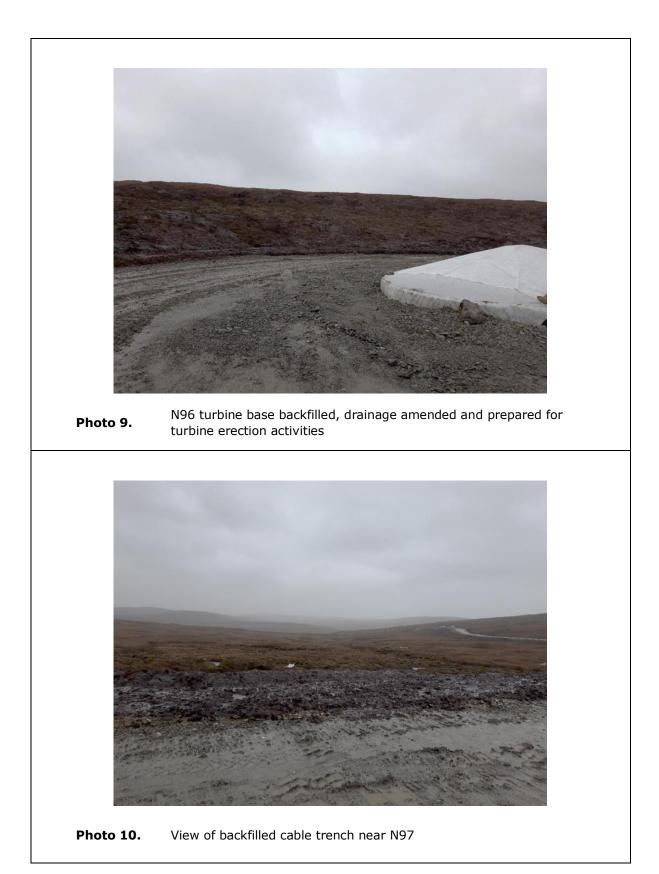
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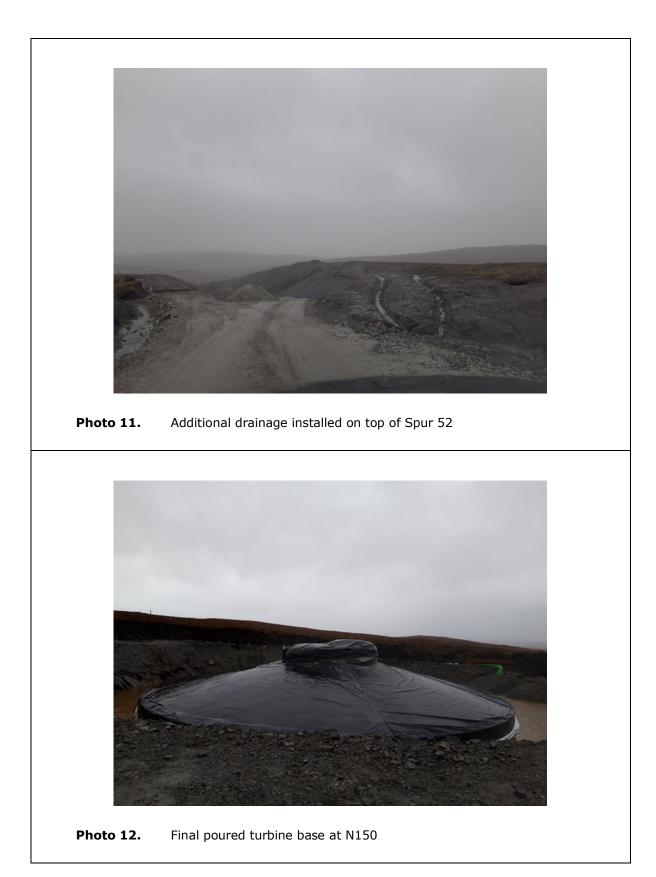
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Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	16 th November 2022





Photo 16. Temporary road by A970 being reinstated

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	16 th November 2022