Intended for

Viking Energy Wind Farm LLP

Date

March 2023

Project Number

1620009158

VIKING ENERGY WIND FARM PLANNING MONITORING OFFICER AUDIT REPORT 029: 20TH FEBRUARY TO 21ST MARCH 2023



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1. AUDIT DETAILS

1.1 Audit Details

Audit Number	PMO 029
Location	Kergord
	Main Construction Compound
	Nesting
	North Nesting
	North Compound
Weather Conditions	Low cloud/mist and rain (5°C). Accumulated snow and ice still present in track-side drainage ditches and cable trenches.
Audit Date	21 st March 2023
Audit Period	20 th February – 21 st March 2023
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.

 $^{^{}m 1}$ 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 Audit 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, RJM Design Engineer and SIC Planning Enforcement Officer undertaken on 21st March 2023 which included the following locations:
 - Kergord;
 - Sandwater Road;
 - Main Compound;
 - Nesting;
 - North Compound; and
 - North Nesting.
- Discussions were held with the SSER 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	
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. The turbine numbers used in the site plan have been updated to the operational numbering. The turbine numbering system previously shown is being phased out in line with onset of turbine erections.

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, albeit this was delayed in some locations due to residual accumulated snow and ice. Rock extraction was continuing at borrow pits. The Vestas satellite compound at KBP05 was in the process of being commissioned for use but not yet in use. Turbine components deliveries were ongoing, with both main lattice boom and telescopic mobile cranes were present on site for turbine assembly.

3.1.2 Observations

During the visit, rock was being taken out of KBP02 (photo 1). This is part of the reprofiling process of the borrow pit face as discussed with SEPA to expedite capping of the offending area in Kergord . The full reinstatement of this section is scheduled for April 2023 in keeping with mitigation commitments made to SEPA. Recently installed surface water management measures by KBP03, including settlement ponds and circulation pumped through a reactor were inspected. The surface water management was recently relocated from the downslope to upslope side of the access track to the other to accommodate cable installation (photo 2 and 3).

Photo 4 shows a recently reinstated section of cable track. The PMO observed concrete deliveries to the site from an off-site batching facility. The concrete was being used to form impermeable 'plugs' in sections of the cable track on steep gradients in order to avoid the cable tracks becoming a preferential subsurface drainage pathways. Work was also underway to provide concrete reinforcement to sections of the cable route where additional protection for cables is required (e.g. where the cable array passes underneath hardstanding areas, blade fingers or access routes (photo 5 and 6).

Cranes for turbine erection were noted on site at K46 and K43 (photo 7 and 8). Turbine component laydown was inspected at K46 (photo 9).

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. MKR was not visited during the audit.

Preparatory work for cable laying adjacent to the Sandwater track was noted during the audit.

3.2.2 Observations

Following previous audit, it has been established that the cross-country cable route works would recommence in the week following the March PMO visit. The halted sections of the cross-country

cable route are still in good condition prior to recommencement. The cable route has been marked out in the area adjacent to the Sandwater Track. Preparatory work in progress was noted to include the installation of silt fencing, delivery of pumps for the surface water management and pollution prevention plan and stockpiling of stone for the cable track (photo 10).

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. RJ Macleod has demobilised the concrete batching plant, reinstated the drainage management and concrete washout pits and has handed over the North Compound to Vestas for use as a satellite compound.

3.3.2 Observations

Vestas are in the process of establishing their compound in the upper parts of the North Compound. Labelled skips were noted to be present, along with a number of mobile lighting rigs and general material laydown and storage.

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 the cable trenches, delivery of turbine components and preparatory works for turbine erection.

3.4.2 Observations

The first tower section was noted to have been installed in several locations, with all turbine components delivered to some locations and turbine component deliveries ongoing (see photo from N100, photo 11, 12).

Scaffolding was noted near turbine N100 to be covered with netting to provide a visual screening barrier to avoid disturbance to potential bird nesting locations (photo 15), in keeping with what was installed last season.

Fencing around areas of peat restoration areas was noted to be ongoing.

3.5 Main Compound

3.5.1 Site Setting and Activities

The Main Compound is located at the southern extent of the 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

Vestas have set up site offices and welfare facilities across the car park, opposite the original offices and welfare facilities.

The car parking, original site offices and welfare facilities are functioning well. All materials (including materials on the upper level) were stored according to regulations. No evidence of leaks or staining was observed in the vicinity of the store. All waste skips were 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 of cable trench excavations and backfilling, preparation for cabling, rock extraction and reprofiling work at borrow pit NBP05.

3.6.2 Observations

Rock extraction and reprofiling work was noted to be progressing at NBP05 during the audit (photo 13).

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 construction of the interior of buildings, watercourse diversion, cabling, backfilling of cable arrays, the reprofiling of the areas north and south of the northern water course and the ongoing offsite removal of excess construction materials and materials.

3.7.2 Observations

The substation was not visited during the audit.

3.8 Off site activity/ turbine component delivery convoys

The PMO observed a blade delivery convoy leaving Gremista. The convoy left the yard at the advertised time. Two traffic police vehicles went ahead of the convoy and held traffic at the right hand turn from Gremista on to the A970. The SIC Planning Enforcement Officer noted during the audit that there has been no correspondence from the public regarding the abnormal load convoys, indicating that the management plan and communications protocols are working effectively.

3.9 Communication with SSER Clerks of Work

3.9.1 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 9th of March 2023.

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 and providing advice on peat handling.

The GCoW highlighted that they expect to review detailed reinstatement and restoration plans for borrow pits in the coming weeks.

3.9.2 ECoW

Condition 19 of the planning consent requires the appointment of an Ecological Clerk of Works (ECoW) 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 13th March 2023.

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 is having ongoing communication with the Principal Contractor including details of open cable trenches and maintenance of silt fences. Discussions with the contractor are with a view to minimising the risks associated with heavy rainfall and washing out cable dust in particular. It was noted that there has been some unavoidable delays in the cable installation and reinstatement due to the snow and ice build up.

The ECoW noted that the site was closed for over a week from the 4th March 2023 due to snow and ice. It was noted that the cross-country cable route is due to restart imminently. The ECoW has made all parties aware of the potential constraints relating to breeding bird activity.

The ECoW reiterated the need to inspect the borrow pit reinstatement and restoration proposals as soon as possible.

3.9.3 ACoW

Condition 29 of the planning consent requires the appointment of an Archaeological Clerk of Works (ACoW) to ensure archaeological features are protected and recorded during the development. The ACoW communicated the ongoing works to the PMO on the 8th March 2023.

The ACoW described the ongoing and completed monitoring works across the site. As there is a delay on cross-country cabling works ongoing works was confined to Spur 6.

Following February's visit, ACoW site provision has been suspended until the cross-country works recommence. All other watching brief areas have been completed. For the past month, an ACoW resource remained dedicated to the project, based remotely, was available for call should issues arise. The ACoW has now been requested to remobilise following the decision to recommence cross-country cable route works.

3.10 Communication with SIC

During the February audit, the SIC Planning Enforcement Officer observed work in NBP01 and NBP05. SIC has enquired as to the status of the borrow pit reinstatement plans. PMO notes that generic reinstatement plans have been submitted and approved under Condition 8. Detailed plans are to be submitted to SSE and signed off by SSER GCoW and ECoW. RJM notes that the detailed plans are in draft and will be submitted in due course. The PMO noted that while the pre-commencement element of condition 8 has been discharged, there is an ongoing obligation on the project to demonstrate implementation of the reinstatement plans in full. As such, the PMO will request to see the detailed plans as they become available and will share this with SIC.

The PMO asked SIC if there had been any observations or complaints from members of the public regarding activities on site or as a result of the turbine component deliveries. SIC confirmed it had received no observations or complaints.

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 cable track areas, site wide reinstatement works and cable trench backfilling, and the cross-country cable route construction.
- Update on the construction of the VEWF Substation and undertake PMO audit of the substation area.
- Update on Vestas satellite compounds, delivery schedule and turbine erection.
- Update on borrow pit detailed reinstatement and restoration plans.
- Updates from the ACoW, ECoW and GCoW teams.

4. AUDIT FINDINGS AND REQUIRED ACTIONS

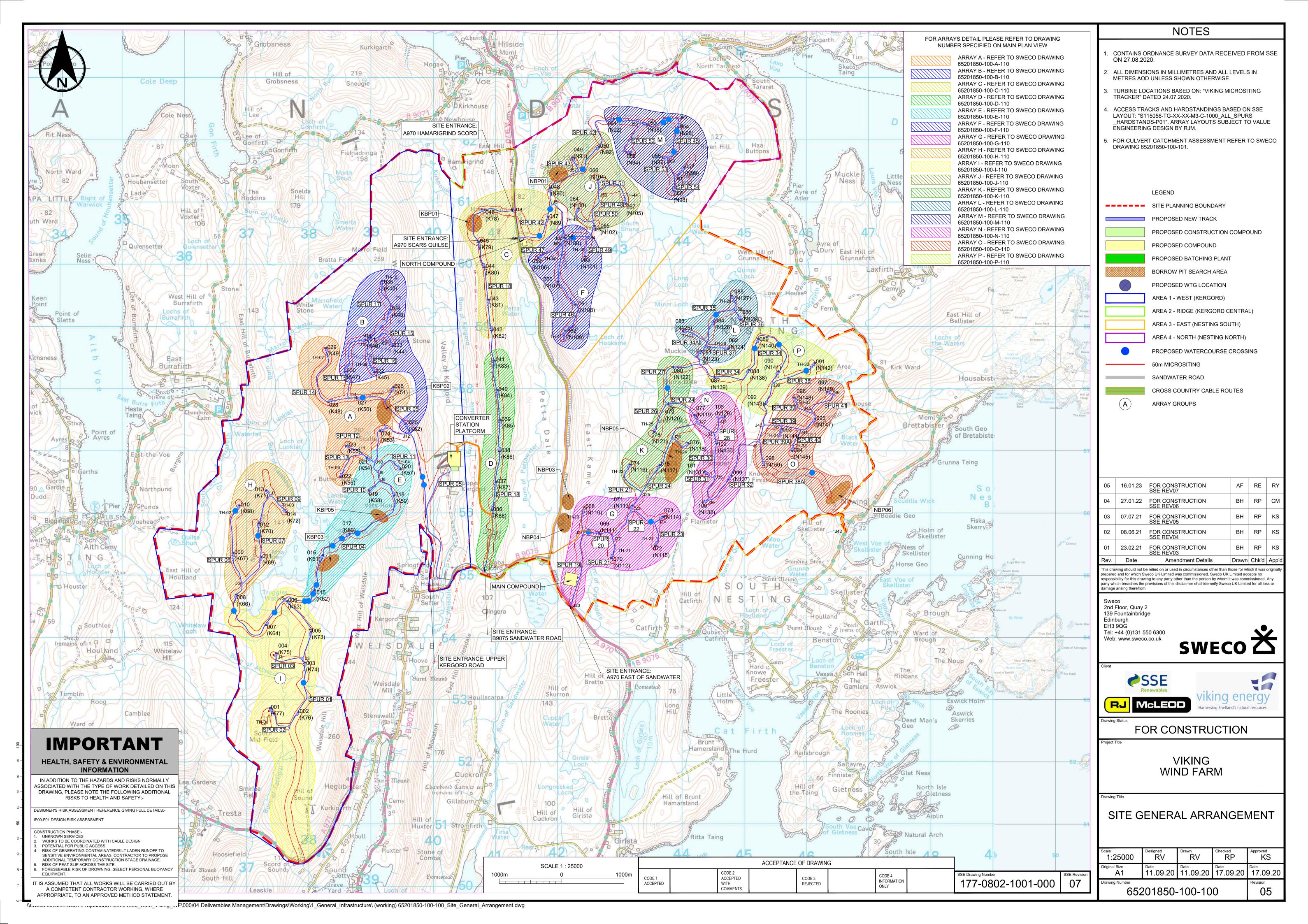
Issue	Auditor Comments	Required Action	Action Owner	Status
Materials Storage and Handling (e.g. oil/fuel storage and peat/mineral soil storage and handling).	Peat restoration areas are managed through the project Habitat Management Plan and by a dedicated HMPO which balances the geotechnical and ecological 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
	The project continues to improve the pollution prevention measures with additional measures installed in high risk areas (e.g. downsteam of KBP02). 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 not a long and uncontrolled continuous discharge. 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. Short-term mitigation measures have been implemented as per the SEPA accepted mitigation plan with long-term mitigation strategy progressing.	VEWF	Amber

Issue	Auditor Comments	Required Action	Action Owner	Status
Pollution Prevention and Waste (e.g. use of spill kits and littering)	During the audit the PMO observed spill kits to be well stocked and readily available in areas where liquids are stored.	No action required	Principal Contractor	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 archaeological watching brief, community liaison. Potential constraints are identified and suitable mitigation measures implemented to prevent negative impacts.	No action required.	N/A	Green

PLANNING	MONITORING	OFFICER AU	JDIT REPO	RT 029: 2	20th FEBRUAR	RY TO 21st MA	ARCH 2023
VIKING E	NERGY WIND F	ARM					

APPENDIX 1
SITE LOCATION PLAN, PEAT RESTORATION PLAN AND PHOTOLOG



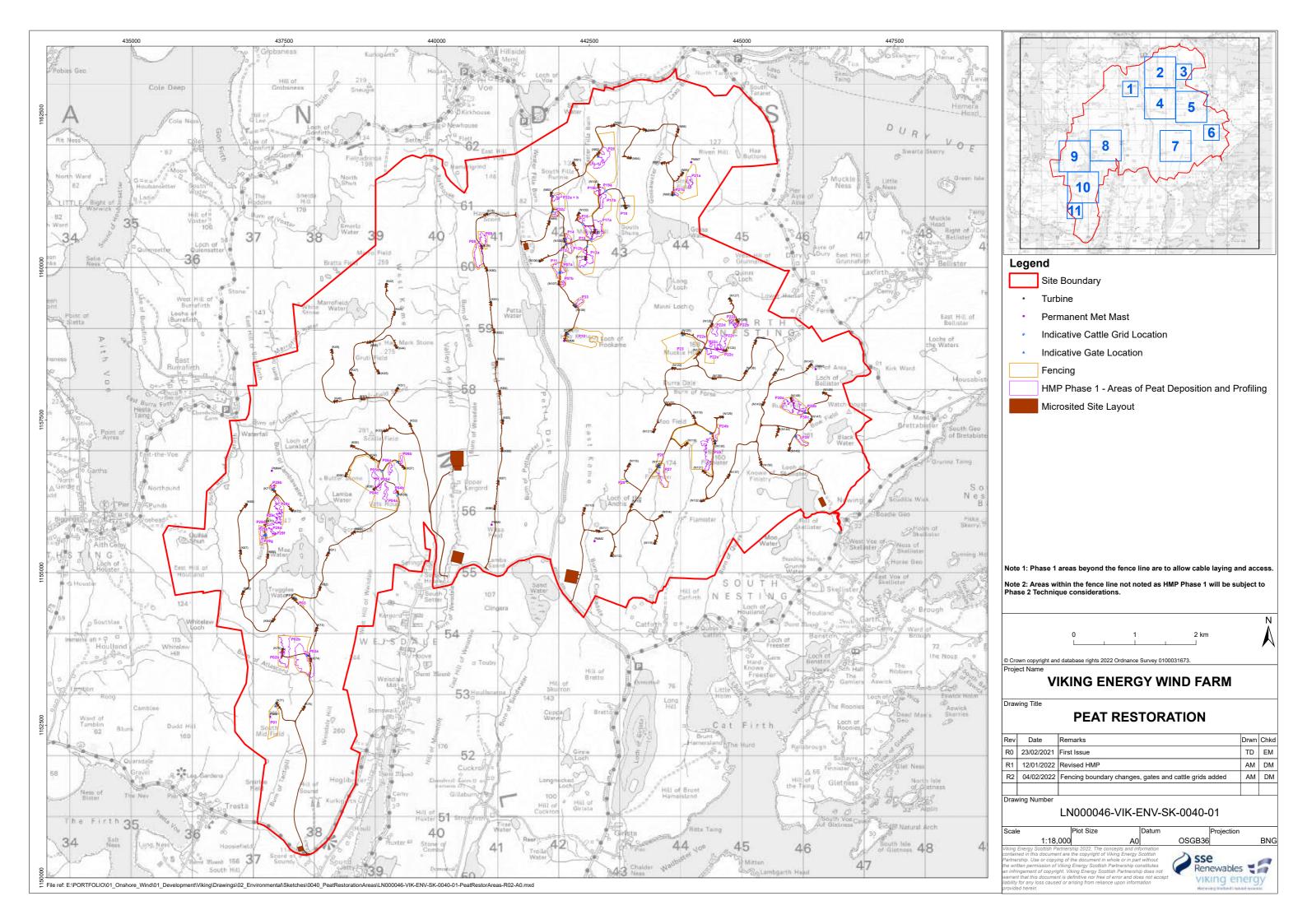






Photo 1. View of KBP02



Photo 2. Mitigation by Maa Water with settlement pond, water pump (and silt fences out of shot), by KBP03

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	21 st March 2023





Photo 3. View of pump/reactor upgradient of Maa Water, by KBP03



Photo 4. Cable track reinstatement near KBP02

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	21 st March 2023





Photo 5. Cable ducts and reinforcement at entrance to Vestas compound (KBP06)

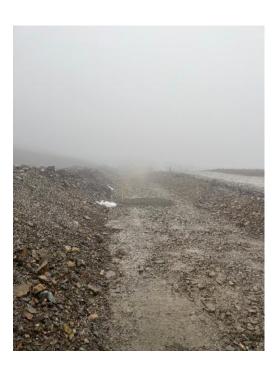


Photo 6. Cable track concrete plug (partially poured)

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	21 st March 2023





Photo 7. Mobile crane (lattice boom) – K46

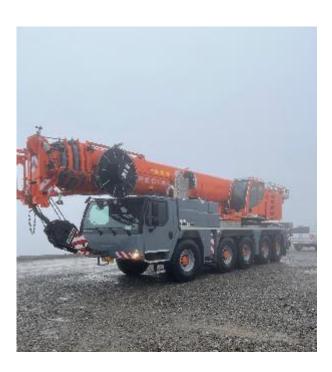


Photo 8. K43 – telescopic boom mobile crane

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	21 st March 2023





Photo 9. K46 laydown



Photo 10. Silt fencing and stone stockpiles adjacent to Sandwater track ready for cross-country cable route

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	21 st March 2023





Photo 11. N100 blade laydown on blade fingers



Photo 12. Tower N100 lower section erected

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	21 st March 2023





Photo 13. Reprofiling work at NBP05



Photo 14. AIL on Sandwater Track

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	21 st March 2023





Photo 15. N100 bird mitigation (netting still to be installed on scaffold)

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	21 st March 2023