

Intended for
Viking Energy Wind Farm LLP

Date
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Project Number
1620009158

VIKING ENERGY WIND FARM PLANNING MONITORING OFFICER AUDIT REPORT 038: 23RD NOVEMBER TO 19TH DECEMBER 2023

**VIKING ENERGY WIND FARM
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038: 23RD NOVEMBER TO 19TH DECEMBER 2023**

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1. AUDIT DETAILS

1.1 Audit Details

Audit Number	PMO 038
Location	North Nesting Nesting Sandwater Road
Weather Conditions	Clear, dry, cold (0°C)
Audit Date	6 th December 2023
Audit Period	23 rd November – 19 th December 2023
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
SSE Renewables Vestas Package Manager	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 the 24th of May 2019.

Separate planning consents are in place for the following specific aspects of the development:

- Construction of the Kergord Access Track¹ (consented on the 29th of 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 the 26th of 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 the 9th of 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.

¹ Shetland Islands Council Planning Reference No: 2018/096/PPF

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 Shetland Islands Council (SIC) regarding public concerns or complaints received during the audit period (if any).
- A site visit attended by the PMO and SSE Renewables Environmental Advisor as undertaken on the 6th December 2023. The site visit included the observation of the following locations:
 - Sandwater Road;
 - North Nesting; and
 - Nesting.
- E-mail updates were shared by 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
SSE	Environmental Advisor

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 following completion of turbine erection.

With all turbines now erected, work across the site is focussed on electrical commissioning. Turbines were noted to be in a 'preservation' mode with hybrid generators in place at each turbine across the site. The majority of civil engineering work is now complete, with localised activities ongoing to deliver reinstatement work, e.g. removal of blade fingers, construction of permanent headwalls on watercourse crossings, borrow pit restoration.

3.1 Sandwater Track

3.1.1 Observations

Observations were made at the Sandwater track. Culvert replacement works, which were ongoing during the November audit visit, were noted to be complete (photo 1 and 2).

Work sites were noted to have been left tidy with the exception of some geotextile (photo 2), which the SSE Environmental Advisor undertook to report (to request uplift) on return to the main compound.

As previously reported, the adjacent cross country cable works have been completed and ground reinstated (photo 3). Watercourses were running clear at the time of the audit.

3.2 North Compound

3.2.1 Site Setting and Activities

The North Compound is located towards the northern limit of the site on the eastern side of the A970 and is used by Vestas.

3.2.2 Observations

The north compound did not form part of this audit visit. It is understood that discussions are ongoing with Shetland Islands Council about the retention/repurposing of the North Compound as a public car park.

3.3 North Nesting

3.3.1 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 the construction of a headwall on a watercourse crossing near Spur 43/ junction 57 (photo 5 and 6).

3.3.2 Observations

Static plant on the site was noted to be provided with a plant nappies. No other material observations were made.

3.4 Main Compound

3.4.1 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.

3.4.2 Observations

The car parking, original site offices and welfare facilities are functioning well. The lower level only was observed during the site audit and appeared tidy. It was noted that preparations are underway for the removal of a significant proportion of the temporary office and welfare provision in early 2024.

3.5 Nesting

3.5.1 Site Setting and Activities

The Nesting arrays are accessed from the A970.

Activities in this area during the audit included construction of a palisade fencing around a LiDAR compound near the main compound. No other active work sites were observed.

3.5.2 Observations

During the audit visit, the restoration work at NBP05 was observed (photo 7).

The PMO understands that discussions are progressing between SSE and RJM to agree an alternative reinstatement plan, including woodland planting within the restored NBP05. RJM are in the process of finalising detailed proposals with a view to implementing in 2024 prior to final handover.

Recent work had been completed to seek to provide a revised surface water management strategy downstream of NBP05. Drainage mitigation and the diversion of surface water flows was carried out to prevent against silty water run out from the north east extremity of the reinstated borrow pit as had been noted during a period of heavy rain. The PMO understands that the SSE ECoW will continue to monitor this in the new year to confirm performance and acceptance.

3.6 Substation

3.6.1 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.

3.6.2 Observations

The substation did not form part of this audit visit.

3.7 Communication with SSER Clerks of Work

3.7.1 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. An update was obtained from the GCoW on 14th December 2023.

The GCoW confirmed that they had not had any site presence since the November audit and that there was nothing to report – this is in line with expectations given that the majority of civil engineering work is now complete.

3.7.2 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. An update was provided by the ECoW on 18th December 2023.

The ECoW indicated that they are continuing to engage with RJM to address litter across the site.

Borrow pit reinstatement is being closely monitored by the ECoW and further inspection is required to assess the recent interventions to mitigate and manage surface water and potential sediment contaminated water from NBP05, which is the Burn of Flamister catchment.

3.7.3 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 14th December 2023.

The ACoW confirmed that they are completing a monthly visit schedule; however given the limited planned activities on site between December and February, there was no update to provide since the November visit (reported in the November PMO report).

3.8 Communication with SIC

The PMO asked SIC if there had been any observations or complaints from members of the public regarding activities on site. SIC confirmed that no complaints or communications had been received during this audit period.

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. A planned schedule of audit visits has been agreed in principle between the PMO, SIC and SSE Renewables. Progress against programme will be monitored to inform the audit schedule between March and June 2024.

It is noted that the development has transitioned from the construction phase into the “snagging phase”, whereby completed works are offered to SSE for review and feedback on issues that might need to be resolved before acceptance. This is likely to include:

- Update on progress of works at Kergord, Mid Kame Ridge, Sandwater Road, North Compound and North Nesting, Main Compound, Nesting and Substation.
- Consideration of any comments received by the SIC or the Developer in relation to the works, including visits to view specific areas of concern.

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- Update on the site wide reinstatement works.
- Update on transfer of compounds to SIC (in the case of the north compound) or reinstatement proposals, including for the main compound.
- Update on borrow pit detailed restoration, particularly on water management at NBP05.
- 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).	<p>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.</p> <p>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.</p> <p>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.</p>	Maintain plastic sheet bund in refuelling area. SSE to undertake further audit of the compound.	Vestas/ Principal Contractor	Green
Natural and Built Environment (e.g. ecology, biosecurity, protected sites, archaeology and site restoration).	<p>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.</p> <p>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.</p>	No action required.	N/A	Green

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Issue	Auditor Comments	Required Action	Action Owner	Status
Pollution Prevention and Response (e.g. use of spill kits, silt control, cement/concrete, water resources).	<p>The project has received authorisation to abstract water from eight locations from SEPA. The authorisation allows the water to be used for dust suppression management. 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.</p> <p>The project continues to improve the pollution prevention measures with additional measures installed in high-risk areas (e.g. downstream of KBP02). The 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.</p>	No action required.	N/A	Green
Pollution Prevention and Response (e.g. use of spill kits, silt control, cement/concrete, water resources).	<p>Silty water and a small volume of oily water were discharged for a short time into Sandwater Loch during culvert replacement works. This was not a long or uncontrolled continuous discharge. Further mitigation was put in place in the areas of concern.</p>	No action required. Field testing for suspended solids determines whether further action and/or external reporting is required.	Principal Contractor and all sub-contractors	Green
Pollution Prevention and Response (e.g. use of spill kits, silt control, cement/concrete, water resources).	<p>The SSE Renewables Environmental Manager notified the PMO in March 2023 that there have been some exceedances of Environmental Quality Standards of some trace metals in water quality sampling in the Burn of Lunklet.</p>	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
Pollution Prevention and Waste (e.g. use of spill kits and littering)	<p>During the August 2023 audit, the PMO observed the plastic sheeting present on the walls of the fuel storage bunded area at the Vestas Satellite</p>	Replacement of damage plastic sheeting when required.	Vestas	Amber

Issue	Auditor Comments	Required Action	Action Owner	Status
	<p>compound to be damaged. A direct breach in the floor of the refuelling area was observed.</p> <p>During the September 2023 audit, the PMO observed that effort has been made to patch the damage. However, direct breach to the floor of the refuelling area can still be observed.</p> <p>During the October 2023 audit, further works were being conducted to repair the breach. This however did not result in any spill or environmental incidents.</p> <p>During the November 2023 audit, the bund was observed to have been successfully repaired and in good condition.</p>	<p>Good maintenance and care of plastic sheeting during operations required.</p> <p>SSE to conduct audit of the compound to ensure good condition of bund is maintained.</p>		
<p>Pollution Prevention and Waste (e.g. use of spill kits and littering)</p>	<p>The generators for the turbine commissioning works observed during the December PMO audit visit had plant nappies.</p> <p>All generators were of hybrid type.</p>	<p>Plant nappies to be installed where absent.</p>	<p>VEWF</p>	<p>Amber</p>
<p>Noise, Dust, and Air Quality</p>	<p>No complaints regarding dust had been received by SIC during the audit period.</p>	<p>Continued monitoring of dust conditions and implementation of control measures as needed; and ongoing liaison as required with other construction operators.</p>	<p>N/A</p>	<p>Green</p>
<p>Resources, Waste and Transport.</p>	<p>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.</p>	<p>No action required.</p>	<p>N/A</p>	<p>Green</p>

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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 ongoing monthly ACoW visit and ongoing ECoW supervision of ongoing reinstatement work and water quality monitoring on the Burn of Lunklet and the Weisdale Tributary.	No action required.	N/A	Green

APPENDIX 1 PHOTOLOG



Photo 1. Sandwater Track Culvert



Photo 2. Geotextile reported for uplift at Sandwater Track

Title: Potential Photographic Log	Client: SSE Renewables
Site: Viking Wind Farm	Date: 6 th December 2023



Photo 3.

Sandwater Track – Looking west towards Kergord – reinstated cross country cable track on right of image



Photo 4.

North Nesting NBP01 reinstatement

Title: Potential Photographic Log	Client: SSE Renewables
Site: Viking Wind Farm	Date: 6 th December 2023



Photo 5. Headwall works near Spur 43/junction 57 North Nesting



Photo 6. Headwall works near Spur 43/junction 57 North Nesting

Title: Potential Photographic Log	Client: SSE Renewables
Site: Viking Wind Farm	Date: 6 th December 2023



Photo 7. NBP05 reinstatement profile - Nesting



Photo 8. Main Compound

Title: Potential Photographic Log	Client: SSE Renewables
Site: Viking Wind Farm	Date: 6 th December 2023