Intended for

Viking Energy Wind Farm LLP

Date

January 2024

Project Number

1620009158

VIKING ENERGY WIND FARM PLANNING MONITORING OFFICER AUDIT REPORT 039: 18TH DECEMBER 2023 TO 19TH JANUARY 2024



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Ramboll 80 George Street Edinburgh EH2 3BU United Kingdom T +44 131 297 2650 www.ramboll.co.uk

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1. AUDIT DETAILS

1.1 Audit Details

VIKING ENERGY WIND FARM

Audit Number	PMO 039
Location	Kergord Nesting North Compound
Weather Conditions	Partially sunny, dry, 7 degrees Celsius
Audit Date	10 th January 2024
Audit Period	18 th December 2023 – 19 th January 2024
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.

 $^{^{}m 1}$ 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 Shetland Islands Council (SIC) regarding public concerns or complaints received during the audit period (if any).
- A site visit attended by SSE Renewables Environmental Advisor was undertaken on the 10th January 2024. It was agreed with all parties that the PMO would not attend in person during this audit, given that limited works had taken place since the last audit visit in December 2023, due to the site closing down for the Christmas period. Prior to the site visit, the PMO discussed with SSE Renewables Environmental Advisor which areas should be inspected during the visit. The SSE Renewables Environmental Advisor undertook the visit and provided photographs and observations to the PMO. The site visit included the observation of the following locations:
 - Kergord;
 - North compound; and
 - Nesting.
- Virtual update meetings were undertaken between the PMO and SSER Geotechnical Clerk of Works (GCoW), Environmental Clerk of Works (ECoW), and Vestas packahe manager.

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 Management Engineer	
Tony Gee and Partners	Geotechnical Clerk of Works	
MBEC	Environmental Clerk of Works	
SSE	Vestas Package Manager	
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 Kergord

3.1.1 Site Setting and Activities

Access to the Kergord Arrays is taken via the Kergord Access Track (KAT), which is accessed from the Sandwater track along the southern boundary of the central area of the development.

Activities observed in this area during the audit included backfilling of the cross-country routes, completion of track and drainage reinstatement works, borrow pit reinstatement, reprofiling of road and internal commissioning works. The cable jointing and cable testing in Kergord are complete. All turbines in the area have been erected and are now undergoing sequential commissioning.

3.1.2 Observations

KBP05 is being used by Vestas as a satellite compound and comprises a refuelling bund. This area was inspected during this audit visit. The plastic sheeting lining the bund was inspected and presented no evidence of wear or tear (Photo 1). A fuel bowser was however noted to be present outside of the bund, this was reported to Vestas via RJM and following the audit the bowser was taken into the bunded area.

The compound at KBP05 was observed to be tidy and well maintained.

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.

3.2.2 Observations

MKR and Sandwater track area was not observed during this audit visit.

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 and is used by Vestas.

3.3.2 Observations

The north compound was visited during this audit visit. Works to reinstate and convert the compound area have commenced. A new recreational car park is awaiting approval from SIC and is being set out with the adjacent embankment being regraded, using stored peat. The area was observed to be levelled during the audit visit.

The western section of the compound is being retained by SIC Road Department as a storage area and is being regraded and levelled (photos 2 and 3). An access road will link this area to the existing SIC access point of the A970 south of the windfarm access point.

Evidence of good fuel storage practice was noted during the audit (photo 4). The plinth and interceptor present onsite will be retained by SIC in the final design.

A container was noted to be present onsite (photo 5); this will be removed by Vestas in due course.

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.

3.4.2 Observations

This area did not form party of this audit visit.

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

The main compound did not form part of this audit visit.

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 were focussed on reinternment works.

3.6.2 Observations

During the audit visit, the restoration work undertaken to date at NBP05 was observed (photos 6 and 7).

The PMO understands that reprofiling has largely been completed, and that SSE ECoW will continue to monitor drainage to confirm performance and acceptance.

RJM design team (SWECO) will be attending site in March 2024 to discuss sign off on the geotechnical aspects for the upfill of all borrow pits, including NBP05.

Discussions are continuing between SSE and RJM to develop an alternative reinstatement plan which includes a native woodland within the restored NBP05.

It is understood that the outstanding works required at geotechnical event 016 (corresponding to a movement of peat located on the eastern side of NBP05) have been agreed with RJM and will be actioned over the coming weeks. The works will require signing off by all parties, it is anticipated that this will take place in March 2024.

The drainage works undertaken at N118 were observed as part of this audit (photos 8 to 10). It was observed that the settlement ponds are being effective at retaining sediments. The two upstream ponds were observed to be full however and requiring emptying. Downstream ponds were observed to be clear of sediments, indicating that the upstream ponds were still functioning well as retention measures despite being full. The outlet to the Burn of Flamister appeared cleared also, with no obvious evidence of siltation. An internal SOR was raised following the audit and the upstream ponds were cleared between the 12th and 19th January 2024. This area should form part of the next audit visit.

Trackside Drainage was observed at various location across Nesting, and a series of outlets were noted (photo 11 to 13). RJM confirmed that these features are the early stages of forming additional outlets from the permanent trackside drainage. These works should form part of the next audit visit.

Good practice in the on-going reinstatement and permanent drainage work was observed across the site, including at Spur 32 south west of T099 (photo 14).

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 did not form part of this audit visit.

3.8 Communication with SSER 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. An update was obtained from the GCoW on 9th January 2024.

The GCoW confirmed that they had not had any site presence since the November 2023 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. The next GCoW visit is scheduled for the coming weeks.

3.8.2 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 9th January 2024.

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.

The ECoW commented that the settlement ponds put in place in the area around N118 are working well, preventing dirty water going into the Burn of Flamister. It was noted that the ponds were filling up with soils, and that regular checks and good maintenance regime are required to ensure that the ponds keep doing their job.

3.8.3 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.

No update was provided by the ACoW. Given the limited on-going and planned groundwork activities on site however, no new update is anticipated on the archaeological aspects since the November 2023 visit (reported in the November 2023 PMO report).

3.8.4 Vestas Package Manager

A discussion was held between the SSE Package Manager for the Vestas works and the PMO on the 8th of January 2024.

Vestas confirmed that most of the remaining work is internal to the turbines, causing minimal disruption. At the time of the discussion, all 103 turbines had been energised.

Further investigation of the potential SF6 gas leak has been undertaken since the last audit period including a tracer test, and a sniffer test undertaken in the sunken ducts present under the turbine foundation (SF6 gas is heavier than air so would sink). The findings of the investigation undertaken to date did not provide any evidence to confirm that a leak has ever occurred onsite. Vestas and their suppliers are continuing to investigate whether there had been a fault in manufacturing meaning the tank was never charged. SSER are awaiting the outcomes.

Plant nappies placement under generators has improved, and it was indicated that all generators being used onsite are now of hybrid type.

Littering across the site is an on-going issue, and litter picking across the site continues to be undertaken. The state of littering across the site should be noted during the next PMO audit visit.

No spill was reported during the audit period.

3.9 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.

3.10 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. A planned schedule of audit visits has been agreed in principle between the PMO, SIC and SSE Renewables. Progress against programme will be monitored as the works progress 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.
- 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).	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.	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).	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

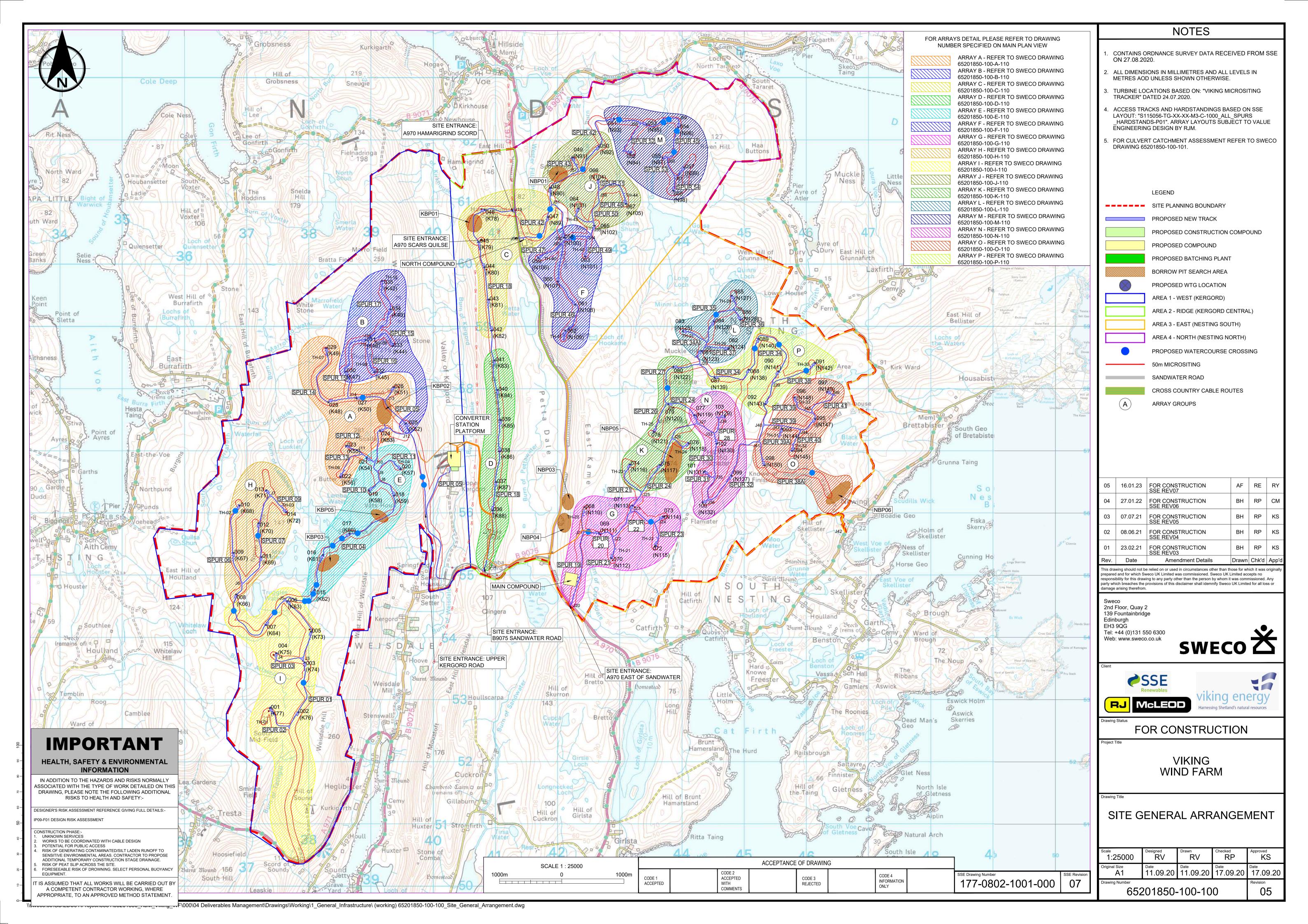
Issue	Auditor Comments	Required Action	Action Owner	Status
Pollution Prevention and Response (e.g. use of spill kits, silt control, cement/concrete, water resources).	The project has received authorisation to abstract water from eight locations from SEPA. The authorisation allows the water to be used for dust suppression 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. 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.	No action required.	N/A	Green
Pollution Prevention and Response (e.g. use of spill kits, silt control, cement/concrete, water resources).	The PMO observed that upstream silt ponds at N118 were full, which was reported as a SOR. This however did not result in a dirty water incident, with downstream ponds and the outlet to the Burn of Flamister noted to be clear during the audit visit.	Ensure regular inspection of drainage system and emptying of ponds as required. SSE to undertake further audit of this area.	Principal contractors	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 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.	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 August 2023 audit, the PMO observed the plastic sheeting present on the walls of the fuel storage bunded area at the Vestas Satellite compound to be damaged. A direct breach in the floor of the refuelling area was observed. 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. 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. During the subsequent audits, the bund was observed to have been successfully repaired and in good condition. A fuel bowser was observed to have been left outside of the bunded area. This was reported and sorted following the audit visit. This did not result in any spill or environmental incidents.	Replacement of damage plastic sheeting when required. Good maintenance and care of plastic sheeting during operations required. SSE to conduct audit of the compound to ensure good condition of bund is maintained and storage of bowsers within bunded area.	Vestas	Amber
Pollution Prevention and Waste (e.g. use of spill kits and littering)	All generators are now hybrid type. Plant nappies to be used under all generators	Audits to be on-going on the use of plant nappies. Plant nappies to be installed where absent.	VEWF	Amber
Noise, Dust, and Air Quality	No complaints regarding Noise, Dust, and Air Quality had been received by SIC during the audit period.	Continued monitoring of dust conditions and implementation of control measures during dry periods; ongoing	N/A	Green

Issue	Auditor Comments	Required Action	Action Owner	Status
		liaison as required with other construction operators.		
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 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

PLANNING MONITORING	OFFICER AL	UDIT REPORT	039: 18th	December	2023 to	19th January	2024
IKING ENERGY WIND F	ARM						

APPENDIX 1
SITE LOCATION PLAN, PEAT RESTORATION PLAN AND PHOTOLOG



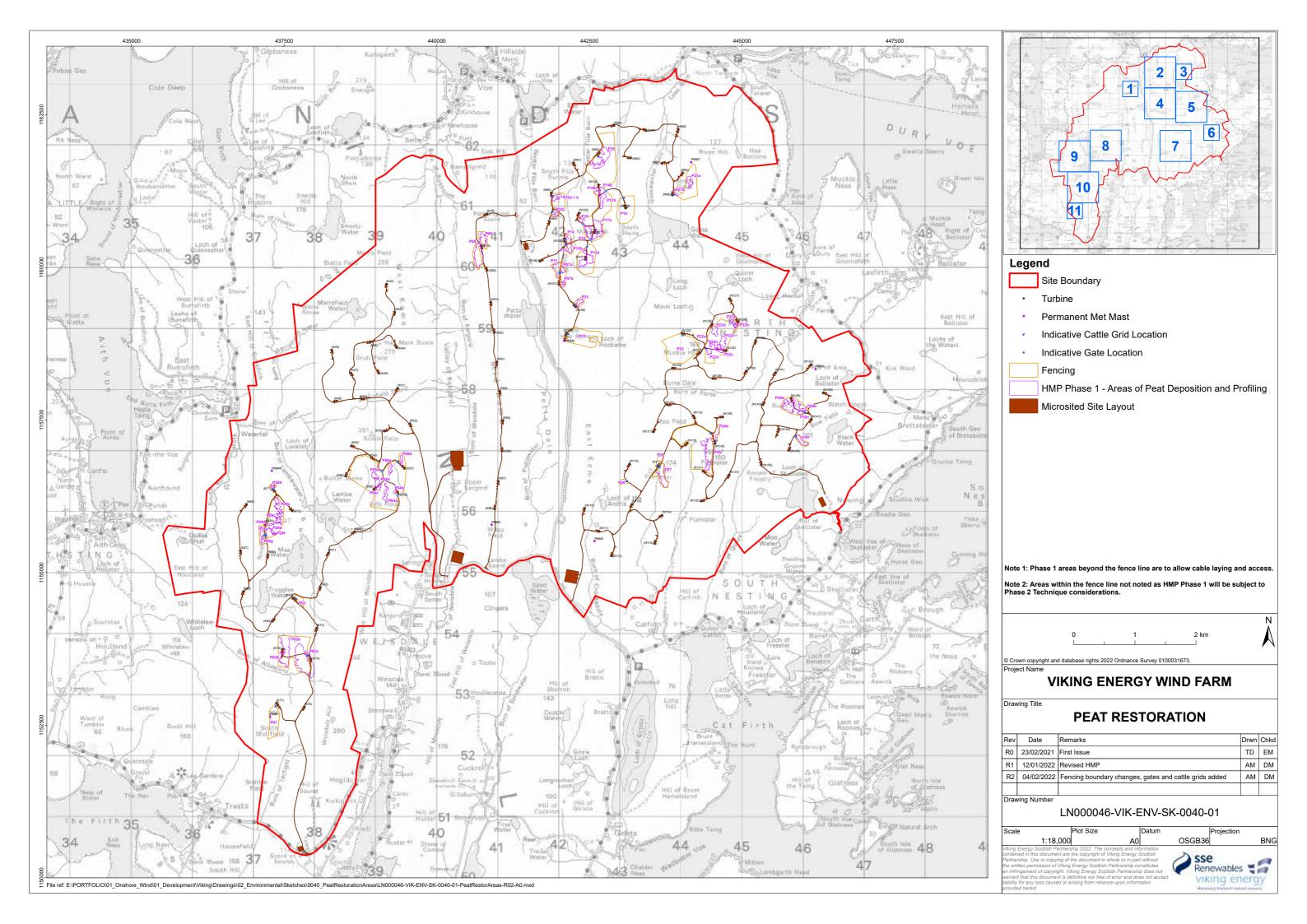






Photo 1. Fuel storage area at KBP05



Photo 2. Reinstatement of North Compound

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	19 th January 2024





Photo 3. Reinstatement of North Compound



Photo 4. Fuel storage good practice at North Compound

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	19 th January 2024





Photo 5. Setting out for North Compound new car park



Photo 6. NBP05 restoration works completed to date

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	19 th January 2024





Photo 7. NBP05 restoration works completed to date



Photo 8. Drainage at N118

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	19 th January 2024





Photo 9. Drainage at N118



Photo 10. Drainage at N118

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	19 th January 2024





Photo 11. Trackside outlet in progress south of T088



Photo 12. Trackside outlet in progress south of T089

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	19 th January 2024





Photo 13. Trackside outlet in progress between T080 and T087



Photo 14. Permanent drainage good practice at T099

Title:	Photographic Log	Client:	Viking Energy Wind Farm
Site:	Viking Energy Wind Farm	Date:	19 th January 2024