

Intended for
Viking Energy Wind Farm LLP

Date
November 2024

Project Number
1620009158

VIKING ENERGY WIND FARM PLANNING MONITORING OFFICER AUDIT REPORT 048: 26TH SEPTEMBER TO 27TH NOVEMBER 2024

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048: 26TH SEPTEMBER TO 27TH NOVEMBER 2024**

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1. AUDIT DETAILS

1.1 Audit Details

Audit Number	PMO 048
Location	Kergord Sandwater Road Nesting Main Compound
Weather Conditions	Sunny, dry, 7°C
Audit Date	27 th November 2024
Audit Period	26 th September – 27 th November 2024
Audit Owner	Ramboll UK Ltd

1.2 Distribution

Position	Action
Ramboll Project Director Planning Monitoring Officer	For information
SSE Renewables Environmental Advisor	For information
Shetland Islands Council Planning Enforcement 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 project was consented as detailed above, receiving Section 36C Consent and deemed planning permission on the 24th of May 2019.

The Viking Wind Farm project comprises 103 operational wind turbines with a turbine tip height of 155 m; associated access tracks; substation and convertor station and other ancillary development. The wind farm was constructed between 2020 and 2024.

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 completed site-based audits at monthly intervals from to monitor the compliance with the conditions of the consent from October 2020 until September 2024. The wind farm was deemed operational by SSE Renewables in August 2024; however in discussion with Shetland Islands council (the planning authority) it was agreed to continue audits on a quarterly frequency from September 2024 for one year to monitor compliance of the final elements of site reinstatement and completion of construction works over that period.

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.

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

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.

1.5 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. From September 2024 site visits will be undertaken on a quarterly basis to ensure compliance with the conditions of the planning consent and associated environmental management plans. The PMO remit relates to construction phase work under the previously referenced planning permissions – any work which relates to site operations and maintenance is outwith the scope of this report.

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, SIC and SSE Renewables (SSER) Environmental Advisor and Consents Manager as undertaken on the 27th November 2024. The site visit included the observation of the following locations:
 - Sandwater Road;
 - Kergord;
 - Mid Kame Ridge;
 - Nesting; and
 - Main compound.
- Update meetings between the PMO and 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
Tony Gee and Partners	Geotechnical Clerk of Works
MBEC	Environmental Clerk of Works
Headland Archaeology	Archaeological Clerk of Works
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.

All wind turbine generators (WTGs) are now commissioned and operational. The majority of civil engineering work is now complete, with localised activities ongoing to deliver reinstatement work, e.g. reinstatement of the main compound. The new Sandwater Road has been surfaced with a permanent bitmac/asphalt running surface, with works to dress the edges of the road nearing completion.

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.

All turbines in the area have been commissioned. The borrow pit reinstatement is complete.

Activities observed during the audit visit comprised fencing works.

3.1.2 Observations

The new design for permanent surface water management to provide attenuation and treatment of surface water draining to the Burn of Droswell from the KAT has been completed (photo 1). The water present in the ponds appeared very silty (photo 2), SSER indicated that this is likely due to the fact that works have been recently completed. It is recommended that this area is being monitored by site personnel to ensure that the drainage system is working properly. This area should be visited during future PMO audits.

The PMO audit included inspection of the temporary drainage treatment at KBP02 (photo 3). It is understood that SSER have taken on the monitoring and maintenance of the treatment system, with continued water monitoring and sampling. Further data is required in order to confirm the acceptability of water quality or the need for additional interventions. Based on the additional data, a reassessment of stream condition will take place early 2025. This area should be visited during future PMO audits.

KBP02 borrow pit reinstatement profiles were noted to be in keeping with the general landscape character and local topography, with successfully vegetated slopes (photo 4).

The need for additional reinstatement work around the site to remove/block up or reinstate construction cut-off ditches that were used during construction to mitigate pollution risks is being undertaken, with a number of ditches having already been reinstated in order to prevent these features contributing to the draining of the restored peatland. Ditches were not observed during the audit visit.

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. Activities included drainage tidying up.

3.2.2 Observations

Along MKR, the track and drains appeared in good condition generally. Some works was on-going along the track (photo 6), consisting of placement of peat to tidy up the drainage along the track as part of the snagging phase.

Along the Sandwater track, the works to provide a permanent surface water drainage solution for drainage in the Burn of Pettawater catchment were noted to have been completed. The road-side swale adjacent to the road has been directed into a permanent attenuation pond which has been recently completed on the north side of the road at Petta Dale (photo 7, 8). Works to dress the edges of the road appeared as near complete, with only fencing still to be undertaken (photo 9). Liaison between SSER and SIC to agree the 'stopping up' of the old Sandwater road is ongoing.

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. The creation of a new recreational carpark is proposed for the North Compound, and a planning application has been submitted to SIC. Further information was requested from SIC in relation to the application, this was submitted by VEFW on 16th December 2024.

3.3.2 Observations

The North Compound was not observed during the audit visit. SSER indicated that additional information is currently being collated to support the planning application for the new recreational carpark.

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

North Nesting was not observed during the audit visit. It is understood that no construction work was ongoing in the North Nesting area.

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, site offices and welfare facilities, material and equipment laydown, and stockpiled material. The upper level has been reinstated and is awaiting seeding. Activities at the lower level compound, now main and only level, comprised the loading of concrete weight blocks onto a lorry, and loading of stockpiled material onto a tipper wagon (photo 10).

3.5.2 Observations

The main compound was observed to be in good order with the ongoing clearing out of site offices. Waste segregation was inspected and noted that it could benefit from improvement, with

the absence of signage for two skips present onsite, and incorrect signage for the third skip (photo 11). This was reported to SSER to be addressed by site personnel. General level of tidiness appeared satisfactory. This area should be visited during future PMO audits.

3.6 Nesting

3.6.1 Site Setting and Activities

The Nesting arrays are accessed from the A970. No activities were observed in this area during the audit visit.

3.6.2 Observations

NBP05 was observed to be in general good condition during the audit visit, with some drainage remediation having taken place, with the creation of a ditch to the west of the footpath to deal with water ponding on the path (photo 12). The ground to the east the footpath and on the lower slopes appeared water logged (photo 13). Successful establishment of seeds was observed on the upper sections of NBP05 (photo 14).

Drainage at T076 was observed. Removal of the secondary additional mitigation drains has taken place, with all drainage works completed. The water was noted to run clear indicating that the drainage remains effective (photo 15). This area should be visited during future PMO audits.

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.

3.7.2 Observations

The substation has been handed over to operations and no longer needs to be visited during PMO audits.

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. Updates were obtained from the GCoW on the 27th November 2024.

The GCoW confirmed that the last visit completed was during week commencing 2nd September 2024 on behalf of SSER to review the geotechnical risk register and geotechnical event remediation on site. The GCoW confirmed that no immediate stability concerns were noted during the site visit, with no concern since the visit took place. A meeting has been schedule in the coming weeks to discuss progress on closing out all geotechnical events.

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 21st November 2024. The ECoW confirmed that their last visit on-site took place in

September 2024 in order to complete activities related to the construction to operations handover, with no concern since the visit took place.

The ECoW has noted further actions to reinstate construction stage surface water cut-off ditches. The construction team will continue to oversee the completion of this work.

The ECoW noted that discussions are in progress to agree operational phase monitoring visits, with visits currently proposed for Spring and Autumn 2025.

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. As noted in the March audit, it has been agreed by Shetland Amenity Trust that no further visits are required by the ACoW unless excavation is required.

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 observations were received during this PMO audit period and discussed with SSER.

3.10 Scope of next audit

It has been agreed with SIC that audits will continue for a further 12 months on a quarterly frequency from September 2024 to September 2025. The PMO will liaise with the SSER operational environment manager and SIC to arrange future audit visits. The next visit is scheduled for March 2025. Future audits will focus on the reinstatement of borrow pits and construction compounds, permanent surface water management, consideration of any issues raised by SIC, and handover of the new Sandwater Road for adoption by the local roads authority.

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>	No action required.	Vestas/ Principal Contractor	Green
Materials Storage and Handling (e.g. oil/fuel storage and peat/mineral soil storage and handling).	Work was ongoing at the time of the audit to clear out stockpiled material and storage areas. Skip signage was observed to be absent for two skips present onsite, and incorrect signage for the third skip.	Improve waste management	N/A	Amber
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. The ECoW construction phase duties are now complete,	No action required.	N/A	Green

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Issue	Auditor Comments	Required Action	Action Owner	Status
	albeit follow up surveys are proposed for 2025 to assess the success of reinstatement and the need for any remedial work. The construction phase duties of the ACoW are complete.			
Pollution Prevention and Response (e.g. use of spill kits, silt control, cement/concrete, water resources).	The project construction phase is now effectively complete. Additional reinstatement work is required around the site to remove/block up or reinstate construction cut-off ditches that were used during construction to mitigate pollution risks.	SSE to confirm plan to reinstate cut-off ditches.	VEWF	Amber
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.	Short-term mitigation measures have been implemented as per the SEPA accepted mitigation plan. Further monitoring is required to understand if the issue will require long-term mitigation. .	VEWF	Amber
Pollution Prevention and Waste (e.g. use of spill kits and littering)	A small number of generators will be retained on site – the majority have been removed.	Audits to be on-going on the use of plant nappies.	VEWF	Green
Noise, Dust, and Air Quality	No complaints on Noise Dust or Air Quality had been received by SIC during the audit period.	Continued monitoring of dust conditions and implementation of control measures during dry periods.	N/A	Green
Resources, Waste and Transport.	The construction phase Site Waste Management Plan will end following handover of the site to the SSE operations team. No issues in relation to waste management were identified during the audit.	No action required.	N/A	Green

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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. Ongoing ECoW and GCoW supervision during the audit period was noted.	No action required.	N/A	Green

APPENDIX 1 PHOTOLOG



Photo 1. Permanent surface water management at the Burn of Droswell



Photo 2. Permanent surface water management at the Burn of Droswell

Title: Photographic Log	Client: Viking Energy Wind Farm
Site: Viking Energy Wind Farm	Date: 27 th November 2024



Photo 3. Temporary drainage treatment at KBP02



Photo 4. Works along the track on MKR

Title: Photographic Log	Client: Viking Energy Wind Farm
Site: Viking Energy Wind Farm	Date: 27 th November 2024



Photo 5. Sandwater Road – Swale (Petta Dale)



Photo 6. Sandwater Road – completed attenuation pond (Petta Dale)

Title: Photographic Log	Client: Viking Energy Wind Farm
Site: Viking Energy Wind Farm	Date: 27 th November 2024



Photo 7. Sandwater Road – road edges completed



Photo 8. Loading of stockpiled material onto a tipper wagon at the main compound

Title: Photographic Log	Client: Viking Energy Wind Farm
Site: Viking Energy Wind Farm	Date: 27 th November 2024



Photo 9. Main Compound – skips



Photo 10. NBP05- drainage

Title: Photographic Log	Client: Viking Energy Wind Farm
Site: Viking Energy Wind Farm	Date: 27 th November 2024



Photo 11. NBP05- waterlogged area west of the footpath



Photo 12. NBP05- vegetated slopes

Title: Photographic Log	Client: Viking Energy Wind Farm
Site: Viking Energy Wind Farm	Date: 27 th November 2024



Photo 13. Drainage down from NBP05 along T076

Title: Photographic Log	Client: Viking Energy Wind Farm
Site: Viking Energy Wind Farm	Date: 27 th November 2024