Development Management and Strategic Road Safety
Roads Directorate

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TRANSPORT SCOTLAND
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Your ref:
ECU00000728

Our ref:
TS00538

Date:
20/12/2018

Dear Sirs,

THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

ELECTRICITY ACT 1989 : APPLICATION FOR SECTION 36 CONSENT FOR THE PROPOSED RED JOHN PUMPED STORAGE SCHEME IN THE PLANNING AUTHORITY AREA OF THE HIGHLAND COUNCIL

With reference to your recent correspondence on the above development, we acknowledge receipt of the Environmental Impact Assessment Report (EIAR) prepared by Aecom in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, we would provide the following comments.

Proposed Development

The proposed development comprises the construction of a Pumped Storage Hydro scheme (PSH) of approximately 400MW installed electrical generation capacity. The site is located on the eastern shore of Loch Ness, 14km south-west of Inverness. The nearest trunk road to the site is the A9(T), located approximately 10.5km to the north-east, while the A82(T) between Inverness and Fort Augustus lies along the north-west shore of Loch Ness. Transport Scotland was previously consulted at the pre-scoping and scoping stages of the application and provided comment in letters dated 11 September 2017 and 26 October 2017 respectively. In these, we noted that there were no Trunk Roads identified within the study network, however, we noted that the A9(T) may be utilised for the transportation of quarried materials.

Construction Traffic

The impact of Traffic and Transport is dealt with within Chapter 15 of the EIAR. This indicates that the access route for all conventional construction vehicles will be via the B851 from its junction with the A9(T) until its junction with the B862, then via the B862 until its junction with the C1064 and then via the site access. We note that for the purpose of the assessment, it has been assumed that 12,000m^3 of material will be required to be removed from the Development Site in order to represent a worst-case scenario, while in practice it is unlikely that any material will be required to be removed from the Development Site, significantly reducing the number of daily HGV movements. It is also noted that an on-site concrete batching plant (or plants) will be utilised to further reduce the impact of construction traffic. Vehicle movements associated with site clearance and forestry works have been included in the traffic impact assessment.

Table 15.10 entitled 'Worst Case Traffic Impact Assessment for All Vehicles' provides a worst-case scenario estimate of the trips generated during the peak construction month. While the trunk road network has not been included within this assessment, we note that the total number of all vehicle trips is of the order of 820 vehicles per day. We have identified the Annual Average Daily Flow (AADF) on the A9(T) at two locations – near Inshes and at a point approximately 7km south of Daviot. The AADF at these sites is 11450 and 9381 respectively. It is clear therefore, that even assuming that all 850 generated trips route along the A9(T), this will result in a maximum percentage increase in total traffic on the trunk road of 8%.

Looking at the impact of HGV trips only, the EIAR indicates that the worst-case scenario number of HGV trips is likely to be in the region of 186 HGVs per day. The daily HGV flows at the two A9(T) sites are 1091 and 983 respectively, which results in a maximum HGV increase of 16%.

Both of these increases are below the Institute of Environmental Management and Assessment (IEMA) Guideline thresholds of 30% for further assessment. Transport Scotland is therefore satisfied that there will be no significant traffic or related environmental impacts on the A9 trunk road as a result of the development.

Abnormal Loads

We note that there will be a requirement for a significant number of Abnormal Loads (AILs) to be delivered to the Development Site during the construction phase, currently estimated to be in the region of 816 trips. In addition, large construction plant vehicles will be required to be delivered for use on-site due to the scale of the earthworks that are to be carried out.

We note that both an Outline Construction Traffic Management Plan (CTMP) and Swept Path Analysis (SPA) (albeit limited) have been carried out, and are provided in Appendix 15.1 and 15.2 respectively. We note that the SPA does not include an assessment of the tunnel boring machine (TBM) and other components such as generators as the desktop software used does not have the capability to accurately model the transporters required to move these components. A separate assessment will be provided which will assess the transportation of these components and the scale of any works which will be required to provide access. We also note that while the Abnormal Load Route is identified as A9(T), B851, B862, C1064, no analysis of the A9(T) section of the route has been provided.

Transport Scotland would request that the finalised CTMP, a revised SPA including an assessment of the appropriate transporters on the A9(T) and any forthcoming updates be forwarded to the Area Manager for discussion and agreement as soon as they are available.

Conclusions

Based on the review undertaken, we can confirm that we are satisfied with the submitted EIAR and we have no objection to the development in terms of environmental impacts on the trunk road network. We would, however, request that the following conditions be attached to any consent that may be granted:

Condition 1: Prior to commencement of deliveries to site, the proposed route for any abnormal loads on the trunk road network must be approved by the trunk roads authority. Any accommodation measures required including the removal of street furniture, junction widening, traffic management must similarly be approved.

Reason

To minimise interference and maintain the safety and free flow of traffic on the Trunk Road as a result of the traffic moving to and from the development.

Condition 2: During the delivery period of abnormal loads any additional signing or temporary traffic control measures deemed necessary due to the size or length of any loads being delivered or removed must be undertaken by a recognised QA traffic management consultant, to be approved by Transport Scotland before delivery commences.

Reason

To ensure that the transportation will not have any detrimental effect on the road and structures along the route.

I trust that the above is satisfactory and should you wish to discuss any issues raised in greater detail, please do not hesitate to contact Alan DeVenny at SYSTRA's Glasgow Office on 0141 343 9636.

Yours faithfully

REDACTED

John McDonald

Transport Scotland
Roads Directorate

cc Alan DeVenny – SYSTRA Ltd.