

Mark Ashton
Energy Consents Unit
The Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Your ref:
ECU00001800

Our ref:
TS00538

Date:
30/05/2019

econsentsadmin@gov.scot

Dear Sirs,

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

ELECTRICITY ACT 1989 SECTION 36 AND SCHEDULE 8: APPLICATION FOR THE PROPOSED KIRKAN WIND FARM 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 RSK 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 up to 17 wind turbines with a tip height of up to 175m and a total installed capacity of up to 81.6 MW. The site is located approximately 5.8 km north-west of Garve in the Highlands. The nearest trunk road to the proposed development is the A835(T) which forms the northern boundary of the site. Transport Scotland was consulted on the Scoping Report for this application, and provided comment in a letter dated 18th June 2018.

Site Access

The EIAR indicates that site access will be taken from the A835(T) to the north of the site near the Aultguish Inn. It is noted that the details of the proposed access are provided in Figure 11.1 although we note that the drawing is largely un-dimensioned. Transport Scotland would request that its design and management of existing uses served by the access be discussed and agreed with the Area Manager. The Area Manager for the A835(T) is Marco Bardelli - 0141 272 7130.

Assessment of Environmental Impacts

The potential impact of traffic and transport is dealt with within Chapter 11 of the EIAR. This states that the main construction traffic access routes are as follows:

- B817 (Invergordon), A9(T) (Alness), A835(T)
- A862 (Dingwall), A862, A835(T)
- A9(T) (Inverness), A835(T)

We note that a threshold assessment to assess the impact of development traffic has been undertaken for the A9(T) and the A835(T) trunk roads. The results of this exercise are presented in Table 11.9 of the EIAR. The results indicate that the A9(T) will experience a maximum increase in HGV traffic of 2%, which does not exceed the 30% threshold as set out in the Institute of Environmental Management and Assessment (IEMA) Guidelines. We note, however, that the three sections of the A835(T) examined all exceed the 30% threshold, with increases of between 57% and 102%. The A835(T), therefore, has been the subject of further assessment.

The potential environmental effects associated with increased traffic have been assessed in line with the IEMA guidelines, with the conclusions of the assessment identified as follows:

Effect	Predicted Impact
Pedestrian severance	Negligible sensitivity, negligible significance
Driver stress and delay	Negligible sensitivity, negligible significance
Pedestrian delay and amenity	Low sensitivity, negligible significance
Fear and intimidation	Low sensitivity, negligible significance
Accidents and road safety	Negligible adverse

We note that no further traffic assessment has been carried out on the A835(T) route. In particular, no analysis has been undertaken for the increase in traffic through the A9(T)/ A835(T) Tore Roundabout and the A835(T) / A862(T) roundabout at Maryburgh. We also note, however, that the base traffic on these sections is relatively low, and that the maximum percentage increase in total traffic for the section of the A835(T) between the site and Garve is 23%, while the sections closer to the roundabouts identified above experience a maximum percentage increase of 7%.

Given the above, and the temporary nature of the construction traffic, we can confirm that we are satisfied with the conclusion that there will be no significant environmental effects on the trunk road network as a result of construction traffic.

Traffic Management Plan

The EIAR indicates that a Traffic Management Plan (TMP) will be produced at the pre-commencement stage of the development, identifying how traffic will be managed throughout the duration of the construction period and including potential mitigation measures. The TMP will define the prescribed routes for HGV access to ensure that such vehicles only use approved routes to arrive at and leave the site. The TMP would also include measures adopted by the Contractor, such as signage, wheel washing facilities and any temporary access arrangements.

Transport Scotland would request that this document be discussed and agreed with the Area Manager, as identified above, given that the development will be taking access directly from the trunk road network. The TMP should also address management of the existing parking area served by the proposed access.

Abnormal Load Assessment

We note that no Abnormal Load Assessment has been provided within the EIAR. The report states that “*an assessment has been undertaken and potential constraints identified for further investigation or resolution prior to construction*”, however, no detail has been provided as to where these constraints may be. Transport Scotland will require to be satisfied that the size of turbines proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path. A full Abnormal Loads Assessment report should, therefore, be provided that identifies key pinch points on the trunk road network.

With the exception of the site access junction, no Swept Path Analysis has been provided. This should be undertaken and details provided with regard to any required changes to street furniture or structures along the route.

Conclusions

Transport Scotland considers that, with the exception of the principle of the site access junction, the EIAR, as presented, satisfactorily demonstrates that the proposed development will not have any significant adverse environmental impact on the trunk road network. Consequently, we have no objection to the development in terms of environmental impact, however, we would 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 prior to the movement of any abnormal load. 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 the wind turbine construction materials 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.

Condition 3: Wheel washing facilities shall be provided at an appropriate point within the site adjacent to the access from the A835(T).

Reason:

To ensure that material from the site is not deposited on the trunk road to the detriment of road safety.

Condition 4: The proposed means of access to the trunk road should be submitted for approval by the Planning Authority in consultation with Transport Scotland as trunk road authority and, thereafter, implemented prior to the commencement of development.

Reason

To minimise interference with the safety and free flow of the traffic on the trunk road.

Condition 5: Visibility splays shall be provided and maintained on each side of the access to the A835(T), to the satisfaction of the local Planning Authority after consultation with Transport Scotland as the Trunk Roads Authority. These splays are the triangles of ground bounded on 2 sides by the first 4.5 metres of the centreline of the access driveway (the set back dimension) and the nearside trunk road carriageway measured 215 metres (the y dimension) in both directions from the intersection of the access with the trunk road, unless otherwise agreed in writing with the Planning Authority. In a vertical plane, nothing shall obscure visibility measured from a driver's eye height of between 1.05 metres and 2.00 metres positioned at the set back dimension to an object height of between 0.26 metres and 1.05 metres anywhere along the y dimension.

Reason:

To ensure that vehicles entering or exiting the access can undertake the manoeuvre safely and with minimum interference to the safety and free flow of traffic on the trunk road and to ensure that the standard of access layout complies with the current standards and that the safety of the traffic on the trunk road is not diminished.

Condition 6: Prior to commencement of deliveries to site, a Construction Traffic Management Plan must be submitted to and approved by Transport Scotland to ensure that general construction traffic and abnormal loads can be transported along the trunk road network safely and efficiently.

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.

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.