Glen Earrach

Technical Clarification on Traffic and Transport

Dear The Highland Council,

Electricity Act 1989
Town and Country Planning (Scotland) Act 1997
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017

Glen Earrach Energy Pumped Storage Hydro (PSH) Project
Technical Clarification THC Transport Team – September 2025
ECU Ref: ECU00005121

The Highland Council (THC) Planning Case Officer received an internal consultation response from THC Transport team on the 17 July 2025. It is noted that the consultation response includes comments relating to traffic at the Glen Earrach PSH. This document has been prepared by the Glen Earrach Energy project team to respond to those comments.

Construction Site Access (off A831)

THC Comment 1:
At the time that the EIA Scoping for this proposal was submitted (Planning Ref. 24/02045/SCOP), there were 3No. potential means of access being looked at. Two of those were direct from the A82 Trunk Road south of Drumnadrochit, with the other from the A831 Local Public Road at Balnain.

We'd recommended at that time THC's preference was to make best-use of the road hierarchy in that area, and to take their construction and ongoing operational access direct from the A82(T). It is therefore disappointing that the main construction and ongoing operational access for the development is now proposed from the A831 Local Public Road near Balnain.

Applicant Clarification:
Following detailed engineering and environmental appraisal, and informed by very clear community feedback at the community events, the A831 option was determined to represent the most balanced solution.

A fundamental benefit of the selected Coiltie access (from the A831) is that it enables all major construction traffic to circulate internally within the Proposed Development. This design choice removes the need to use the A82 for the transfer of materials between different parts of the Proposed Development site. Under the earlier option for access from the Loch-side of Meall Fuar-mhonaidh, material excavated from tunnels or borrow pits would have emerged on the opposite side of the mountain to where it was required, necessitating movement via the external public road network.

By contrast, the Coiltie access has been specifically designed to allow material to be moved internally within the Proposed Development site boundary. Consequently, only workers, imported materials and equipment will use the public road network. This internal circulation benefit is the primary optimisation measure, sitting above the others (on-site aggregate sourcing, marine delivery of the LCW, and on-site accommodation to reduce worker flows),

and is a key reason why forecast traffic volumes are significantly reduced compared to other comparable schemes.
As outlined in EIAR Chapter 3: Evolution of Design and Alternatives (Volume 2: Main Report), the Proposed Development has evolved through an iterative design process. Where the design has been progressed in parallel with the EIA process through consideration of engineering feasibility, environmental constraints and consultation responses. From the outset of the design, the Applicant has been strongly aware of the A82 as a critical transport link for the local area, and the Applicant was also aware of the knock-on effect to other roads like the B862 on the south side of Loch Ness, if the A82 is impacted.

During the pre-application consultation process and following consultation with communities, the design was amended to reduce this impact as much as possible, including moving the construction of the Lower Control Works to a waterborne operation, and relocating the main access to the A831 via the existing Forestry Land Scotland (FLS) forestry road, which will only be require to be upgraded to suit the needs of the Proposed Development.

This ensures that only A-class roads are used, which are already designed for HGV traffic; rather than single-track roads and avoids traffic turning off the A82 directly onto a site access. Additionally, and of real importance, during community consultation, it was made clear by the community that there was an aversion to increasing traffic, particularly HGVs through the village of Drumnadrochit, with the bridge over the river Enrick (at point of A831 turnoff) and Urquhart Castle turnoff both being highlighted as areas of concern for additional construction traffic.

Accessing the site from the A82 North, via the A831 addresses these concerns by avoiding the Urquhart Castle area and eliminating the need for construction traffic to cross the Enrick bridge itself. Whilst HGVs will still need to turn onto the A831 at the junction adjacent to the bridge, this significantly reduces impact compared to requiring construction traffic to cross this constrained infrastructure

The EIAR Chapter 13: Access, Traffic and Transport (Volume 2: Main Report) assesses the impact of the Proposed Development on the road network including the A82, A831, A833 and the A887. The assessment concludes that there would be no significant adverse effects on the road network, following the introduction of the Construction Traffic Management Plan (CTMP).

A Framework CTMP is provided in EIAR Appendix 13.2 (Volume 5: Appendices). Importantly, the EIAR assessment of the impact on the road network refers to a conservative realistic scenario, and the Applicant is committed to further reducing transport and movement as much as possible, to minimise local disruption throughout the Construction phase and to always ensure road safety. It is anticipated that this will be undertaken further through the production of the CTMP, which will be agreed in consultation with Transport Scotland and THC. It is anticipated that production of the CTMP will be a required planning condition of consent and agreed with the relevant authorities, prior to be implementing in full before the commencement of the Proposed Development.

Transport Scotland's consultation response of 21 May 2025 to the ECU notes it has reviewed the submitted EIAR and has no objections to the Proposed Development regarding its environmental impact on the trunk road network.

Operation Site Access (off the A82(T))

THC Comment 2:

A secondary operational access has been proposed directly from the A82(T). The submission states that this access will have limited use and will serve primarily as an inspection route for dam safety in accordance with the Reservoirs (Scotland) Act 2011, as well as providing alternative emergency access.

Also, access to the lower control facility and outfall into Loch Ness is proposed direct from the A82(T) south of Drumnadrochit. Transport Scotland will need to comment on the suitability of both accesses proposed direct from the A82(T) south of Drumnadrochit, as the responsible body for the Trunk Road Network in Scotland.

It is noted and welcomed that the submission clarifies no construction access will be taken to or from the east of the access near Balnain via Cannich. That is because the section of the A831 north of Cannich is not suited to such types and quantities of large commercial goods vehicles. We recommend that this is controlled through a suitably worded Condition on any Planning Permission issued.

Applicant Clarification:

In relation to operational access use of the A82(T) at Alltsigh, this this access will have limited use and will serve primarily as an inspection route for dam safety in accordance with the Reservoirs (Scotland) Act 2011, as well as providing alternative emergency access. Transport Scotland in its consultation response does not raise any objection to this or the proposed access to the LCW, which is also proposed for operational traffic only. At the request of THC, a gate was added to the road at the LCW and this was included as part of the Applicant's Additional Information in June 2025.

In relation to the operational access from the A82(T), Transport Scotland notes that this will not be used by construction traffic and advises that evidence will be required as to the proposed methodology for preventing HGV access during construction. Transport Scotland notes that a Framework CTMP has been developed to mitigate the potential impact of the construction traffic and considers this approach to be appropriate stating that the CTMP will require to be discussed and agreed with the Area Manager for the A82(T).

Transport Scotland is of the view that this can be addressed in the Final CTMP to be submitted prior to commencement of the development to the Planning Authority, after consultation with Transport Scotland. Thereafter, all construction traffic associated with the development shall conform to the requirements of the agreed CTMP.

The Applicant agrees that a suitably worded condition restricting construction traffic east of Balnain is appropriate and acceptable.

A831 Access & Construction Traffic Figures

THC Comment 3:

The section of the A831 between Drumnadrochit and the proposed access near Balnain is designated as an "Agreed Route" through the Timber Transport Forum Agreed Route Map. This means that the route is designated as being capable of accommodating large standard commercial goods vehicles without restriction. Therefore, subject to appropriate mitigation at sensitive locations and times of day, we do not object to the section of the A831 between Drumnadrochit and the proposed access near Balnain being used for the construction and operational access needs of this development.

However, reference should be made to our queries below about the reliability of the predicted peak construction traffic figures. The submission states that those predicted traffic impacts over the anticipated 8-year construction period are anticipated to peak at 212 vehicle movements a day, consisting of 178No HGV movements and 34No car / minibus / LGV's.

However, the above figures would appear to have been determined from first principles incorporating a series of assumptions, including:

- **Aggregate and stone haul** All aggregate and stone for access tracks, platforms, compounds, dams and concrete will be secured from borrow pits and tunnel excavations within the development site. The information within the submission suggests that this should save over 57,700 20T tipper lorry loads of aggregate needing to be brought to the site (over 115,400 HGV vehicle movements). However, the submission does not clarify that sufficient ground investigations have been undertaken to confirm that the existing ground will be suitable for providing the material required for all of the assumed uses. Therefore, it is highly possible that proportions of those 115,400 trips missing from the assessment and peak figures above may be required.
- **Construction of LCW** The lower control facility and outfall into Loch Ness will be constructed as a "marine project" via Loch Ness and won't generate any significant road-going construction traffic. The submission however does not appear to clarify how this will be undertaken, including where plant, materials and the workforce needed will gain access to Loch Ness for travelling to the site. It would appear that the submission has assumed no vehicular impacts from this aspect of the development on the public roads being considered.
- **Temporary Workers Accommodation** The majority of the workforce will live in temporary accommodation on site and will be bused via a park and ride arrangement to and from the different parts of the development. The submission has assumed that only 20% of the predicted workforce on site during any particular day would travel out of the wider development site throughout the entire construction period. It has also assumed that all of those trips would be undertaken by filled 12-seater minibuses. This does not appear to be realistic, plus it is not clear how the workforce trips to and from the development at the start & end of a working week have been taken into consideration in the predicted traffic numbers.
- **Tree Felling** The submission states that there will be a need for tree felling to support the development. However, we've not identified any reference to that when calculating the predicted peak daily vehicle movements.

Applicant Clarification:
Fundamental Design Principle – Internal Circulation
The forecast traffic figures for the Proposed Development must be understood in the context of a fundamental design decision: all construction circulation is contained within the Proposed Development site boundary, with only imports (workers, material and equipment) requiring use of the public road network at agreed times as will be proposed in the CTMP.

This principle was established and explained in the EIAR. As set out in Chapter 3: Evolution of Design and Alternatives (Sections 3.4.8–3.4.9), access arrangements were reviewed between Design III (Scoping, April 2024) and Design IV (Post-Scoping, September 2024). During this evolution, three potential access routes were identified, but following consultation feedback and engineering review, the A831 entry from Balnain was confirmed as the primary access. This allowed the main construction camp to be located at the Coiltie and enabled

internal circulation of materials (from tunnelling, borrow pits and other works) across the site.

This design evolution removed the need to transfer material between work sites via the A82 or other external roads, directly addressing concerns raised during early engagement and consolidating temporary and permanent works in the north near the River Coiltie. The embedded design principle of internal circulation underpins the lower traffic profile of Glen Earrach compared with other pumped storage hydro schemes and is central to the justification for selecting the A831/Coiltie access.

3.1 Aggregate and stone haul – basis, imports and contingency

The EIAR traffic assessment set out in *Appendix 13.1 Annex E* is based on comprehensive on-site aggregate sourcing. Aggregate material requirements will be met from the headpond borrow pit, tunnel spoil, and an existing FLS borrow pit at the entrance to the Proposed Development site, on the upgraded existing forestry track. A small allowance has been included for the Pre-Construction and Enabling phase imports (c. 310 HGV deliveries over several months, representing less than 0.3% of the total aggregate requirement). This allowance is already incorporated in the EIAR traffic assessment and occurs in the Pre-Construction and Enabling phase prior to the busiest construction month.

The forecast peak of 178 HGV movements per day arises from a later programme phase when multiple critical activities overlap. This peak figure includes a significant allowance for imported sand, in addition to the small early-phase import allowance of imported aggregate.

Site investigations and engineering assessments, supported by laboratory testing of recovered samples, indicate that the local rock mass is suitable for use in rock-fill embankments, aggregate production, and concrete manufacture. The contractor's construction methodology includes on-site crushing to generate the required aggregate. This combined approach to cut/fill balance and re-use of excavated materials is documented in the *Materials Management Appraisal* (EIAR Volume 5, Appendix 15.1). The appraisal demonstrates that the headpond embankments and other principal structures can be constructed primarily from on-site won material, with only negligible import requirements. No credible scenario has been identified in which bulk external supply on the scale of the ~115,400 HGV movements referred to in THC's comment would be required.

Prior to commencement, the CTMP will include a short materials-sourcing verification note summarising the final on-site production approach, acceptance testing, and any limited contingency arrangements, to confirm inputs to the traffic envelope.

3.2 Lower Control Works (LCW) – marine logistics

The Lower Control Works (LCW) is planned as a **waterborne** construction project, with materials and equipment to be transported via the Caledonian Canal and along Loch Ness. Personnel are anticipated to be mobilised to the LCW site via boat using the existing jetty infrastructure around the Loch Ness, and the LCW construction site will include jetty provision of the transit of materials, equipment and personnel from the water to the site.

As noted in the earlier section, supplies for the headpond location will still route via the **A831** (which connects to the **A82**). However, the approach to the Proposed Development site via the A831 combined with the LCW marine strategy **minimises exposure on the A82 corridor through Drumnadrochit and past Urquhart Castle**. Final routing, staging, laydown and

protective measures will be specified in the CTMP, which will be agreed with THC prior to implementation.

3.3 Temporary workers' accommodation and personnel movements
Assumption. The EIAR assumes **20% of the daily workforce** undertakes off-site trips, with managed **12-seat minibus** operations. This 20% envelope **includes**:

- start/end of leave and shift rotations for accommodated staff;
- daily movements of locally-housed staff;
- contractor management movements and specialist personnel; or
- In the event of an emergency.

In relation to controls, the CTMP will set enforceable measures: parking controls, minibus dispatch and occupancy targets, staff travel plans, and monitoring against the 20% allowance. If monitoring indicates exceedance risk, adaptive measures (e.g., additional services, staggered shifts) will be implemented.

3.4 Tree felling
The total tree felling associated with the Proposed Development is anticipated to be **<11 ha** (**EIAR Volume 2, Chapter 18: Forestry**), comprising localised widening along the A831 access and low-density woodland at the LCW, via the A82. The Applicant understands that FLS intends to pause forestry operations in the immediate vicinity to avoid conflicts on the shared access, which will be managed by a local access code of conduct. Timber extraction linked to the Proposed Development is expected to be modest with any such haul routed via the agreed hierarchy and incorporated in the CTMP model and counters. Net effect on peak site-generated HGV movements for the Proposed Development is negligible relative to the assessed envelope.

Above predicted peak daily traffic figures
THC Comment 4:
The above predicted peak daily traffic figures appear to be extremely low for the scale of the proposed development that, at its peak, is predicted to require a 1000-person workforce on site. Also, when compared to other similar schemes considered in the area, the above figures again appear to be low. For example, the Transport Assessment provided in support of the Loch Kemp Pumped Storage Hydro Scheme on the east side of Loch Ness (Planning Ref. 23/06025/S36) was predicting a peak of 384 vehicle movements a day. Also, the Red John Pumped Storage Hydro Scheme (Planning Ref. 18/05427/S36) was predicting a peak worst-case scenario of 820 vehicle movements a day. Given all of the above, we believe that the predicted peak daily vehicle movements proposed in support of this application cannot be relied upon as being representative of what the likely peak traffic impacts of this development could be. We recommend that a more detailed appraisal of likely construction traffic generations by this development, informed from appropriate contractor input, is undertaken to gain a greater and more realistic understanding of the likely impacts on the public roads in the area. This should then be used to inform the nature and scale of mitigation required.

Applicant Clarification:
The Applicant acknowledges THC's queries on the peak traffic figures and welcomes the opportunity to provide more detail behind the assumptions and detail design decisions that enable the Proposed Development's construction traffic profile to be materially lower than other PSH schemes.

The submitted EIAR numbers use realistically conservative assumptions and represent the **single busiest month** for environmental assessment. They incorporate design choices that

suppress road traffic demand (on-site material sourcing, marine delivery for LCW, and on-site workforce accommodation with managed transport).

Final projections, controls and monitoring will be secured through a **Construction Traffic Management Plan (CTMP)**, to be prepared with the appointed contractor and submitted to the Planning Authority for approval (in consultation with Transport Scotland where applicable) prior to commencement. The CTMP will include traffic counters, reporting and an adaptive management component that can evolve with the project, through feedback from Transport Scotland, THC and members of the community.

4.1 Why Glen Earrach's numbers are lower by design

THC references a forecast peak of 178 HGV movements per day (89 inbound / 89 outbound), within a total of 212 vehicle movements per day during the single busiest construction month of the Construction Phase. This is compared with higher peak forecasts reported for other pumped storage hydro schemes in the area, such as Loch Kemp (384 daily movements) and Red John (820 daily movements).

The lower traffic profile for the Proposed Development reflects four design and construction decisions embedded from the concept stage, each of which materially reduces demand on the public road network:

1. **Internal circulation of materials.** The Balnain/Coiltie access enables all major construction circulation to remain internal to the project boundary. Excavated material, aggregate and equipment can therefore be transferred between work sites without recourse to the public road network, with only genuine imports requiring use of the A831/A82;
2. **Material self-sufficiency.** On-site aggregate production from the headpond borrow pit, tunnel spoil, and the FLS borrow pit removes the requirement for approximately 115,400 HGV movements otherwise associated with bulk imports;
3. **Marine delivery for the Lower Control Works (LCW).** Material, equipment and personnel for the LCW will be transported by water via the Caledonian Canal and Loch Ness, materially reducing reliance on the A82/A831 corridor; and
4. **On-site accommodation with managed transport.** A peak workforce of up to 1,000 personnel will be housed within temporary on-site accommodation, with movements controlled through managed minibus services rather than private vehicle commuting.

These measures are not assumptions introduced at assessment stage but are embedded design and construction principles. They collectively underpin the reduced traffic envelope reported for the Proposed Development relative to other comparable schemes.

4.2 Assessed (conservative) traffic envelope – Average Daily HGV Movements

The traffic figures presented in the EIAR of the Proposed Development are based on a realistic conservative assessment envelope. They adopt prudent assumptions regarding programme overlap, vehicle payloads, and material sourcing in order to ensure that significance testing is carried out against robust upper-bound values. The figures represent average two-way HGV movements per day during the specified periods of construction activity, rather than maximum instantaneous flows:

- **Peak construction month (busiest single month):** 178 HGV movements per day (89 inbound and 89 outbound);
- **Average across the 8-year construction period:** 54 HGV movements per day (27 inbound and 27 outbound); and
- **Average during all months outside the busiest 12-month period:** 38 HGV movements per day (19 inbound and 19 outbound).

These figures are already inclusive of the conservative assumptions regarding aggregate self-sufficiency, with a residual allowance for imported sand, and also incorporate the small early-phase import allowance described in Section 3.1.
For context, the bulk constituents of concrete (coarse aggregate, cement, and sand as fine aggregate) account for a large proportion of total construction tonnage. In conventional models, imported inert material generates frequent HGV movements. The Glen Earrach assessment assumes that coarse aggregate is met through on-site sources, with only residual sand imports included within the traffic envelope.

4.3 Potential optimisation via the CTMP once developed further (indicative only; for information and not utilised within the assessment)
Subject to validation of on-site production of manufactured sand, the removal of the remaining high-volume sand import stream could reduce HGV **movements by up to c. 40%** relative to the assessed case. **Illustrative** figures (rounded to even totals with matching inbound/outbound) are:

- **Peak month: 72 HGV movements per day** (**36 in / 36 out**);
- **8-year construction average: 22 HGV movements per day** (**11 in / 11 out**); and
- **Outside busiest 12 months: 16 HGV movements per day** (**8 in / 8 out**).

These indicative optimisation figures are **illustrative only** and are **not relied upon** for the environmental assessment envelope or for decision-making. If implemented via the CTMP and validated through pre-commencement testing by the principal contractor, any optimisation would be secured and monitored via the CTMP. Importantly, achieving such reductions would also create additional contingency headroom within the agreed assessment envelope, allowing flexibility to accommodate any limited unforeseen material imports or programme adjustments without exceeding the assessed peak figures.

4.4 Contractor input and CTMP commitments
In a further measure to reduce transport impacts, the Applicant would be content to ground the final traffic forecasts in contractor methodology, in line with THC's recommendation. The CTMP, to be submitted for approval prior to commencement, will be prepared with the appointed contractor and will include validated projections based on final plant, sequencing and haul arrangements.

The specific mitigation and monitoring measures expected to form part of the CTMP — covering delivery scheduling, prohibition of convoying, school bus lay-bys, community feedback, debris control, surfacing and traffic counters — are set out in detail in our response to **Comment 5** below.
Conclusion

- The EIAR traffic **movements** are conservative and reliable for a scheme designed to **optimise internal circulation of materials**, **avoid bulk imports**, **use marine delivery for LCW**, and **control workforce transport**;
- The peak **178 HGV movements per day** already assumes **limited imports (not zero)**—principally sand—and includes the small early-phase aggregate import allowance;
- Further reductions are **credible but indicative** at this stage; if validated, they will be formalised and monitored through the CTMP and reported publicly; and
- Final projections will be validated through contractor input and agreed via the CTMP.

Glen Earrach

Construction Traffic Management Plan

THC Comment 5:

Whilst we note the submission of a Framework CTMP in support of the Application, we believe that the following points need to be incorporated into the final Plan that will be utilised by Contractors and their suppliers, should this development be granted permission to be built:

- Where the Framework Plan says that deliveries will be scheduled in order to minimise their impacts on other road users, where possible, we believe that this will be a fundamental requirement of managing the impacts of this developments construction traffic. The Final Plan should be required to avoid construction deliveries during the busier periods on the public roads in the area, including during school drop-off and pick-up times and during any planned local events in the area that will generate significant traffic impacts;
- Similarly, when the Framework Plan says "Where reasonable and practical, construction vehicles will avoid travelling in convoys on public roads", this should be a requirement to avoid such activities. Convoying of large and heavy commercial vehicles accelerates road failures as the pavement has no time to recover from previous axle loadings;
- We welcome the suggestion that surfaced areas should be provided along the A831 where the school bus picks-up and drops-off pupils for the local schools and recommend that this is included as a Conditioned requirement on any Permission issued. The design details for that should be agreed by THC and fully implemented prior to the A831 being used for access to the main works associated with this development;
- Again, we welcome the comments about informing the local community and wider public in that area about traffic activities and movements. However, this needs to be expanded to permit local community groups to provide feedback about the performance of the Traffic Management Plan and make recommendations about how the Plan can be improved to better mitigate impacts. This should include a requirement for the Promoter to feedback to those groups on how their recommendations have been considered and what actual changes, if any, came from them;
- In addition to installing facilities to remove mud or other construction debris at the site access prior to joining the public road, the final CTMP should include a requirement to operate street sweeping equipment for removing any such debris that is brought onto the public road. We will also be expecting the designs for the altered access to be surfaced with a suitably bound material for at least the first 20 metres from the edge of the public road; and
- When the Framework Plan says that "records of HGV movements will be maintained and reported", this needs expanding to include a requirement to install traffic counters at site accesses to record the quantum, type and times of vehicle movements into and out of the wider development site. Such information should be reported and published every 6-months throughout the construction period (both numbers within that period being reported and cumulative throughout the project). This information should also be used to determine whether additional changes are required to the Traffic Management Plan.

CTMP Condition –

We recommend that any permission issued includes a suitably worded Condition requiring a Construction Traffic Management Plan, developed with direct input from the Contractor appointed to oversee the construction of the development, be submitted to and accepted by the Planning Authority and then subsequently implemented prior to any works commencing on site. This should be based on the most accurate and up-to-date prediction on anticipated

construction vehicle movement patterns and must include the proposed physical changes to the existing road network and complementary traffic management measures deemed necessary to mitigate the adverse impacts of such traffic.

'Wear and Tear' Agreement with THC

THC Comment 5:

Any such CTMP will also need to include a requirement to enter into a formal 'Wear and Tear' Agreement with THC acting as the Local Roads Authority. Such an agreement should be developed in accordance with Section 96 of the Roads (Scotland) Act 1984 and will include a requirement for a Road Bond or some other suitable form of financial security. This is to protect The Council from incurring any extraordinary expenses in having to repair any damage inflicted to the local public road network by the activities of this development that the Promoter and/or their representatives have not rectified to the satisfaction of the Local Roads Authority.

Applicant Clarification:

The Applicant acknowledges THC's expectation that the CTMP must move beyond a framework and be developed with full contractor input prior to commencement. The Applicant agrees with this approach, as the CTMP will be an evolving document that would be signed off by the THC, prior to implementation where any changes are proposed. At this time, the Applicant would see the CTMP evolving to include such measures as:

- **Delivery scheduling:** Construction deliveries will be programmed to avoid recognised peak periods on the public road network, including **school drop-off and pick-up periods** and any local events notified through the CTMP liaison process. GPS and clear delineation of traffic intended for the Proposed Development will help avoid peak periods and enable for the easy detection of construction traffic by THC and members of the public;
- **Convoying:** The CTMP will include a prohibition on convoying of HGVs, recognising the adverse effects of consecutive axle loadings on road surfaces;
- **School bus pick-up and drop-off areas:** Surfaced lay-bys will be provided along the A831, with final design to be agreed with THC. These will be delivered in advance of main works traffic;
- **Community feedback:** The CTMP will establish a mechanism for local community groups to provide feedback on performance, and the project will provide written responses explaining how recommendations have been considered and acted upon;
- **Debris control:** Facilities for wheel-washing and debris removal will be installed at site exits, supported by road-sweeping operations. Access junction surfaced in bound material will extend **at least 20 m from the public road edge**; and
- **Traffic counters and reporting:** Counters will be installed at site accesses to record the number, type and timing of vehicle movements. Data will be reported publicly at six-monthly intervals, showing both period totals and cumulative totals, and will be used to inform adaptive management of the CTMP.

The Applicant is content for the CTMP, including the measures above, to be secured through a planning condition requiring submission and approval prior to commencement of development. The CTMP will be prepared with direct input from the appointed contractor to ensure forecasts reflect the final construction methodology.

The Applicant recognises the requirement for a formal **'Wear and Tear' Agreement** with THC under Section 96 of the Roads (Scotland) Act 1984. The Applicant is content in principle with providing a road bond or other financial security to ensure the Local Roads Authority is protected from extraordinary repair costs. This would typically include a video survey of the

roads network prior to any use as a Schedule of Condition and will be captured as part of the CTMP.

Abnormal Load Assessment

THC Comment 6

We also recommend that any permission issued includes a suitably worded Condition requiring the final Abnormal Load (AIL) Assessment be submitted to and accepted by the Planning Authority. This should be based on the actual products and vehicles that will need delivering to the development site and be informed by physical trial runs done of vehicles representing those loads. This must include any assessments required of existing road structures impacted by the proposed routing of such loads to and from the development site. We recommend that early engagement is had with THC Structures Team on such matters (structures@highland.gov.uk).

Applicant Clarification:

The Applicant is committed to ensuring that Abnormal Loads (AIL) can negotiate the selected route and that their transportation will not have a detrimental effect on structures on the trunk road route to Proposed Development. AIL will travel to the Proposed Development Site by road. They are expected to travel from the Port of Inverness via the A82 and A831 to the Balnain Main Access. EIAR Appendix 13.1: Transport Assessment (Volume 5: Appendices) contains a Preliminary Route Appraisal for the transport of AIL from Inverness to site. It is anticipated that a detailed AIL assessment will be required as a condition of consent and prior to commencement of the Proposed Development. It is anticipated that this would be submitted to and approved by the Planning Authority, in consultation with Transport Scotland.

Design & Construction details of proposed access from the A831 near Balnain

THC Comment 7

We note the intention to make physical changes to the existing Forestry and Land Scotland access from the A831 near Balnain to both accommodate the proposed construction traffic and manage any conflicts between such traffic and wider users of the existing access. To ensure that the changes proposed are sufficient, including the tie-in with the local public road, we recommend that the design and construction details for such access changes to the proposed access from the A831 near Balnain are submitted to and accepted by the Planning Authority and then subsequently fully implemented prior to the works commencing to build the proposed development.

Such designs should confirm their suitability to accommodate the different types and volumes of traffic needing to use the access and demonstrate that the changes are to be built in accordance with the requirements from our published Roads and Transport Guidelines for New Developments. This should include demonstrating the achievable visibility splays in both directions along the A831 from a 2.4 metres setback and justifying that they are sufficient when compared to the requirements from the above linked Guidelines.

Applicant Clarification:

The Applicant would be content for design and construction details for the upgraded Forestry and Land Scotland access near Balnain to be submitted for approval prior to commencement. These will:

- demonstrate capacity for the types and volumes of construction traffic anticipated;
- show tie-in with the A831 in accordance with THC's Roads and Transport Guidelines for New Developments;
- confirm that visibility splays meet the 2.4 m set-back requirement, or provide justification against published standards; and

- include details of surfacing, drainage, signage and safety features appropriate to the anticipated traffic mix.

During community consultation, local residents expressed a preference for extending the **30 mph speed limit** to cover the Proposed Development site access from the A831 at Balnain. The Applicant is supportive of further dialogue with THC on this matter.

Road Opening Permit

THC Comment 8:

Any permission issued should also include a suitably worded Informative clarifying that no works should be undertaken on or directly adjacent to the local public road network until a Road Opening Permit has been sought from and accepted by THC acting as the Local Roads Authority. The process of seeking such permits is set out on THC website at: Apply for a road opening permit.

Applicant Clarification:

The Applicant is aware of this requirement and will seek the necessary permit from THC, prior to commencement of development of the Proposed Development.

To conclude, we hope THC find these clarifications useful and we are happy to accept a suitably worded planning condition as proposed.