

AI_4_03 Traffic and Transport

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

Response to THC Transport Planning Memorandum dated 9 July 2026

ECU Ref: ECU00005121

THC Ref: 25/01599/S36

The Applicant has reviewed the Transport Planning Team memorandum dated 9 July 2026, issued following submission of the Updated Cumulative Traffic and Transport Assessment dated 9 March 2026 (AI_3_29) and the Grid Connection Traffic and Transport Review dated April 2026 (AI_3_38).

The Applicant notes that the matters raised principally concern the form of appropriate conditions and controls, and agrees with the Transport Planning Team that the Construction Traffic Management Plan (CTMP) is the appropriate measure through which the detailed management of construction traffic should be secured and developed with the appointed contractor post consent.

1. A831 construction traffic routing

The Applicant understands from subsequent correspondence with the Planning Officer within The Highland Council that the reference in the memorandum to preventing PSH construction access along the A831 **east** of the Proposed Development site access near Balnain was a drafting error between east and west, and that the intended restriction relates to construction traffic travelling **west** from the site access towards Cannich.

This is consistent with the Applicant's submitted transport strategy, under which the principal construction traffic route approaches the Proposed Development site from the east via the A82 and A831.

The Applicant is content for the intended routing restriction to be secured by condition. However, to avoid unnecessarily restricting incidental project movements, which do not give rise to the traffic effects that the condition is intended to manage, it is suggested that the restriction is directed specifically at HGV construction traffic and abnormal loads. In principle, wording could provide that:

No HGV or abnormal load construction traffic associated with the Proposed Development shall access or egress the Proposed Development site using the section of the A831 between the site access and Cannich, other than in an emergency or as may otherwise be prior agreed in writing with the Planning Authority.

The Applicant would be content to agree the detailed wording with the Transport Planning Team on that basis.

2. Cumulative construction traffic and Bingally

The Applicant understands and agrees with the Transport Planning Team's objective of avoiding an unacceptable cumulative traffic impact on the A831 arising from the Proposed Development and other major projects.

For clarity, the Proposed Development construction programme was updated on the basis of the latest information available to the project team, with a revised start in October 2027. That programme was then assessed against the latest available construction programmes for the Bingally 400kV Substation and OHL Tie-in (25/02301/S37), Cnoc Farasd Wind Farm and Chrathaich Wind Farm. The traffic profiles reported in AI_3_29 are the modelled output of that exercise. The construction vehicle forecast and construction duration for the Proposed Development remain unchanged from those previously assessed.

As recorded at Section 2.3.1 of AI_3_29, the effect of the revised programme is that Proposed Development traffic largely avoids the A831 during the principal Bingally 400kV Substation construction period.

The Applicant is content for this intended transport outcome to be secured through an appropriately worded condition. It is suggested, however, that the condition has two components to it, such that it retains sufficient flexibility to allow the respective project programmes to be coordinated where the same assessed transport outcome can be achieved:

1. the Construction Phase for the Proposed Development does not commence until the main works for the Bingally 400kV Substation and OHL Tie-in associated with significant HGV transport or abnormal loads have been completed such that associated construction traffic has substantially reduced; **or**
2. where the programmes overlap, it is demonstrated through the approved CTMP and appropriate coordination with other relevant developments that forecast combined daily HGV movements on the affected A831 links will remain within the highest cumulative daily HGV levels already assessed in AI_3_29.

This alternative would not increase the assessed cumulative traffic envelope. It would simply allow the same transport outcome to be achieved through coordinated construction traffic management where project programmes change or overlap. Traffic counters, reporting and liaison through the CTMP would provide the appropriate means of monitoring the Proposed Development's traffic contribution and managing the position as construction progresses.

The October 2027 assessment already includes the Proposed Development's Pre-Construction and Enabling Phase overlapping with the Bingally 400kV Substation construction programme. The Applicant therefore requests that any condition is expressly worded so that the restriction on commencement of Construction Phase does not prevent the assessed Pre-Construction and Enabling Phase from proceeding.

3. Grid Connection

The Applicant understands The Highland Council Transport Planning Team's objective in seeking to avoid unacceptable cumulative traffic effects associated with the future Grid Connection works and does not disagree with the principle.

The Grid Connection does not form part of the Proposed Development for which consent is presently sought. The final Grid Connection route will be the subject of a separate consenting process by the relevant transmission operator, including the necessary consent for any overhead line and/or underground cabling elements, together with any other associated infrastructure. Nevertheless, the Grid Connection Traffic and Transport Review (AI_3_38), submitted as part of the June 2026 Additional Information, assessed the potential traffic and transport effects of a reasonable indicative Grid Connection using the information available at that stage. This included assumptions regarding the indicative 2 km underground cable and 16 km OHL connection, construction access and sequencing relative to the Bingally Substation and OHL, Cnoc Farasd Wind Farm and Chrathaich Wind Farm. Those assumptions were adopted to enable the potential traffic effects of an indicative connection to be assessed proportionately; they do not define or commit the future Grid Connection route, design or construction programme.

The Applicant therefore considers that detailed sequencing and construction traffic management requirements relating to construction of the Grid Connection are most appropriately considered and secured through that separate consenting process and its associated CTMP, so that the relevant obligations apply directly to the party responsible for delivering those works. The Applicant is not in a position to give commitments through this consent in respect of a project it will not itself construct.

4. CTMP and other transport controls

The Applicant confirms the commitments previously provided in the September 2025 Technical Clarification (AI_3_24) and is content for the following to be secured through appropriate conditions:

- preparation and approval of a detailed CTMP with direct input from the appointed contractor, including final traffic projections validated against the contractor's construction methodology, plant, sequencing and haul arrangements;
- construction traffic monitoring, including traffic counters at the relevant site accesses and periodic reporting to The Highland Council;
- liaison and coordination with other major developments using the A831;
- a formal Wear and Tear Agreement and associated Road Bond or other appropriate financial security;
- submission and approval of the final Abnormal Indivisible Load assessment, including early engagement with the Structures Team from The Highland Council; and
- approval and implementation of the detailed A831 site access upgrades prior to commencement of the Construction Phase, while allowing the access to be used during the Pre-Construction and Enabling Phase, including for traffic associated with other preliminary track and site works and with delivery of the access upgrades themselves.

The requirement for a Road Opening Permit prior to works on or directly adjacent to the local public road network is noted and agreed, and the Applicant is content for this to be secured by informative.

In relation to the potential extension of the 30 mph speed limit to cover the proposed A831 site access, the Applicant considers that this may provide a wider local benefit and remains supportive of progressing the matter through the appropriate process. Any proposal would be developed in accordance with national guidance and with appropriate engagement with The Highland Council, Police Scotland and the local community.

5. Conclusion

The Applicant agrees with the transport management objectives sought by the Transport Planning Team and accepts the controls recommended in the memorandum.

Three clarifications are requested when the conditions are drafted:

- that the A831 routing restriction is corrected to apply to HGV construction traffic travelling west from the site access towards Cannich;
- that the Pre-Construction and Enabling Phase already assessed in AI_3_29 is not prevented by the restriction on commencement of Construction Phase; and
- that the Bingally 400kV Substation sequencing condition retains an alternative route to compliance where combined construction traffic can be demonstrated to remain within the highest cumulative levels already assessed.

The Applicant would welcome further discussion with the Transport Planning Team on the detailed wording of these conditions.