



Clatto Landscape Protection Group

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Clatto Landscape Protection Group Objection to the Proposal to build a wind power station on Clatto Hill. Reference Number 03/03397/EEIA.

Transportation

Clatto Landscape Protection Group (CLPG) have studied Scottish Power's (SP) Environmental Impact Assessment (EIA) and would make the following points:

SP quote the following 3 documents used as guidance:-

- 1 NPPG 17
- 2 PAN 57
- 3 Guidelines for the Environmental Assessment of Road Traffic, Institute of Environment Assessment, 1993.

The first 2 documents are easily accessed, however we have been unable to access the last guidance document.

CLPG held a meeting with Fife Transportation Services (FTS) on 8th January 2004 and asked a number of questions of them. The answers to these questions gave us considerable cause for concern, not least of which involve road safety issues. We informed FTS of our difficulty in obtaining this 3rd document and were informed that they could not find their copy, but would provide one to us as soon as possible. At this stage I should point out that we imply no criticism of FTS. The representatives were most helpful but clearly lacked information on several crucial points which we feel SP should have supplied to them. We would contest that SP have failed to engage FTS and others in full as is required.

FTS have as yet not supplied or advised us with regards to the 1993 document. They have however provided us with a computer generated disc headed "Transportation Development Guidelines." Contained in this document Chapter 2. Fig 2.1 Typical Procurement Flow Diagram – shows that at Planning Consent stage a Transport Assessment is a precursor to the granting of planning consent. In addition to this as highlighted in SP's EIA, PAN 57 paragraph 2 on Transport Assessment notes that: The policy framework referred to in NPPG17, and which will be developed further in guidance to be issued in due course, requires developers to produce a Transport Assessment for significant travel generating developments. The Transport Assessment is to be distinguished from an Environmental Assessment, but may, where a formal Environmental Assessment is required, form part of it.

Quoting directly from SP's EIA Chapter 4 page 4-3. 4.2.3.1 Public Road 7

"For traffic using the public highway a traffic management plan *will be developed* in consultation with Fife Council Transportation Service, the Police and the local community." (our italics)

Indeed FTS informed us that SP had not carried out a full Traffic Assessment(TA) of the proposed route.

From these considerations we would contest that for the scale of this proposal the effort to engage and form a coherent TA with FTS and other relevant bodies has not yet taken place and CLPG reserve the right to assess any proposed TA should it emerge in the future. Had full consultation and provision of a TA been provided to FTS we feel the numerous questions asked of FTS on 8th January would have resulted in more questions being answered. Several questions were answered with “I do not know”. Included in these were questions such as :

Has the Education Department been approached with regards to the large increase in traffic passing the two schools on the proposed route?

SP figures apply to the main routes, namely the A916 and the A911, where are the figures for the sensitive points such as the turn off at Kennoway Post Office passing the school and on up to site?

Throughout the meeting it was re-iterated to us that SP had not provided information to FTS to enable them to answer what we consider to be fairly basic questions.

Our point is that it is clear that a TA is required before Planning Consent can be granted. It is also clear that an adequate TA has not yet been provided by SP. We would wish to view any TA in order to make our own judgements on its effects. More importantly- how can FTS make professional judgements in relation to this proposal with the lack of information as it stands?

The EIA describes route 2 as the proposed route to site for construction traffic. From EIA Chapter 4 4.2.3.1 public road

A92 to Glenrothes

A911 and Milton Road to Windygates

A916 Kennoway Road to Kennoway

Denhead, Langside Drive, Langside Road

Right turn before Langdykes towards Devon

Right turn to site entrance to Devon Wood

The EIA talks about “sensitive areas”. We feel that the most “sensitive area” would relate to the last part of this route. Namely, from the turning at Kennoway Post Office up passed the school and to the proposed site. Contained in the EIA are traffic counts for the A911 and A916 but nothing for this most crucial part of the route which passes a busy school.

We have considered Page 13-4 of EIA Table 13.3 – Construction Traffic Monthly Counts

Taking month 3 to end of month 6 there are 6358 movements out of 10456 movements overall.

If you include month 7 – there are 7364 movements out of 10456 movements over the whole 10 month construction period.

With regards to turbine base construction

SP say 960 lorries of concrete will be delivered, A standard concrete lorry will carry 6m³ of concrete, this equates to 5760m³ of concrete or 12672 Tonnes of concrete. This works out at 338.82m³ of concrete per turbine or 745.41 tonnes of concrete per turbine, or 112.94 movements of hgv concrete lorries per base.

We are advised that these bases would have to be constructed in a continual pour and are concerned over the sudden massive increase in traffic consolidated into a short space in time- If you also include the site personnel vehicles – (3600 movements occurring from month 3 to end month 6) (4400 movements if you include month 7)

During these intense periods of activity we consider that other tasks will be carried out other than the sole installation of the turbine bases. Just what might be the true scenario?

Pag 13-5 Item 10 states that SP's analysis is a worst case scenario of 3 hgv arrivals and 3 departures occurring during the same hour. In reality should this massive operation go ahead then we will realistically be dealing with queuing lorries on a regular basis – NOT OVER THE PERIOD OF AN HOUR BUT FOR LONG PERIODS OF TIME THOUGHOUT THE DAY. Also on Page 13-4 item 5 they make several assumptions which we would question including “that HGV movements will be spread uniformly throughout a 12 hour working day.” Do transportation services consider this to be a reasonable assumption to make?

One concern is the lack of figures for the last part of the journey – namely PO at Kennoway passing the school and continuing on up to site. No traffic figures for this part of the journey. This is in an area closest to the residents who are directly affected by this proposal. Surely – even if we accept SP's figures on traffic movements (which we contest are on the low side). This stretch of road through and passed the school and town of Kennoway will show that rule 1 and rule 2 taken from “The Guidelines for the Environmental Assessment of Road Traffic, Institute of Environmental Assessment, 1993 would permit the conclusion that this proposal will have a highly significant detrimental effect on this area with regards to nuisance/road deterioration/public safety etc.

Throughout, SP's considered opinion is that the massive operation previously unseen in Fife on this scale has a low or more often NO significant effect. We contest this.

From the EIA – MITIGATION – note page 13-5 item 13.5 “ A transport management plan will be drawn up by Scottish Power, and agreed with Fife Council Transportation Department.....”. Again we contest that this plan must be available for all to study before consent could be considered.

We would like engineering details of the concrete bases to be provided to FTS. Is it possible that the concrete requirement for these bases is in fact greater than the EIA states? The result being an even greater increase in construction traffic. This and many other questions remain unanswered in the absence of a TA.

We note with interest the significance given to traffic issues in the recent public enquiry rejecting a proposal for turbines near Kinross.