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Your ref:  
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GB01T19K05

Date:  
28/04/2023

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Dear Sirs,

## **ELECTRICITY ACT 1989**

### **THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017**

#### **APPLICATION FOR CONSENT UNDER SECTION 36 OF THE ELECTRICITY ACT 1989 FOR CONSTRUCTION AND OPERATION OF BRANXTON BATTERY ENERGY STORAGE SYSTEM WITHIN THE PLANNING AUTHORITY AREA OF EAST LoTHIAN COUNCIL**

With reference to your recent correspondence on the above development, we acknowledge receipt of the Planning Statement (PS) prepared by Arcus 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, Transport Scotland would provide the following comments.

#### **Proposed Development**

The proposed development comprises the construction and operation of a Grid Services Facility including battery storage modules and other associated ancillary electrical infrastructure. The site is located near Thorntonloch, approximately 2.5km east of Innerwick in East Lothian. The nearest trunk road to the site is the A1(T), which forms part of the north-eastern site boundary. Access to the site is proposed via the local road network, utilising existing junctions on the A1(T).

We note that on 28<sup>th</sup> March 2023, Scottish Ministers adopted the opinion that the proposed development is not EIA development.

#### **Assessment of Environmental Impacts**

The PS indicates that construction of the development is estimated to occur over a 12-month period. Assuming a 6-day working week and a 24-day working month, it has been estimated that an average of 56 HGV movements would occur per day and an average of 60 car/van movements per day would occur for staff.

Abnormal Load Vehicle (ALV) movements would be more infrequent with a total of 30 movements occurring over the 10-month construction period. Given the relatively low level of construction related generated traffic, Transport Scotland is satisfied that the proposal will not have rise to any significant traffic (or related environmental) impacts on the A1(T) and no further analysis is required in this regard.

### **Abnormal Loads Assessment**

A Swept Path Analysis Report (SPA) by Collett & Sons Limited has been submitted. This indicates that Abnormal Indivisible Loads (AILs) will leave the A1(T) at either the Bilsdean/ Dunglass junction which lies approximately 2.1km south of the Torness Power Station junction, or a second access point which lies an additional 1.5km further south, where AILs will turn right onto a small rest area prior to the bridge crossing Dunglass Burn, directly opposite a private access road.

We note that this second access point involves AILs turning right into the rest area and continuing in a southerly direction under underneath Dunglass railway viaduct. This route is closed to traffic, with a fence blocking any vehicular movements beyond the rest area. The route under the viaduct forms part of the Southern Upland Way tourist walking route. Transport Scotland would state that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager, who in this instance is Alex Joannides. Alex can be contacted at [alex.joannides@transport.gov.scot](mailto:alex.joannides@transport.gov.scot)

The SPA indicates that AILs can negotiate the Bilsdean/ Dunglass junction without the need for any physical mitigation, however, we note that utilisation of the full extents of the road are required at this location. We would request that the SPA report be forwarded to Alex to allow his comments and recommendations to be taken on board, in particular, the issue of the second access point which seems to be less favourable as it involves a right-angled turn from the trunk road at a location which is not a recognised road junction along with mitigation works.

### **Conclusions**

Based on the review undertaken, and subject to the agreement of the proposed AIL route, Transport Scotland is satisfied with the PS and has 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 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 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.

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

**Gerard McPhillips**

**Transport Scotland  
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.