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Dear Sir

**Glenfarg Water Treatment Works Upgrading
Planning Application 23/01353/FLL
Response to Representations**

Scottish Water applied for planning permission for the upgrading of Glenfarg Water Treatment Works (WTW) to ensure reliable compliance with regulatory standards and provide resilience within the network. Prior to submitting this planning application, Scottish Water had regular discussions with nearby residents and held a community event in Glenfarg regarding the proposals. A comprehensive effort was made to answer any questions fully and transparently.

A number of representations have been received in relation to the application, from the local community and Glenfarg Community Council. The vast majority of concerns relate to construction traffic movements through Glenfarg village. Following further discussions with the Roads Authority and Glenfarg Community Council we have updated the Construction Traffic Management Plan (CTMP) and have submitted this to Perth and Kinross Council. A summary of key traffic management measures and some further information on key issues raised in the representations is provided below.

Principle of the Development

The existing WTW was built in 1984 and the need for significant investment has been identified to ensure that high quality drinking water can be provided on a sustainable basis. There is also a need to provide significantly improved storage capacity on site in order to provide an acceptable resilience of supply for customers across Kinross-shire and Fife.

The project includes upgrading the water treatment process including a new chlorine contact tank, dosing points and for providing increased treated water storage in the new Clear Water Tanks (CWTs). The existing Chlorine Contact Tank and Clear Water Tank at Glenfarg WTW are under sized and do not meet modern design standards to provide the level of resilience required. The CWT is part of the WTW, and it is vital that it is co-located at the WTW. Having storage capacity at the WTW, or as close by as possible, is essential to allow stable production of drinking water at the site on a day-to-day basis; and to provide resilience and security of supply across all the communities that it serves in the event of any significant disruption to the WTW's normal operation.

Construction Traffic Management and Road Safety

Full detail of our response to the concerns raised about traffic management and the safety of pedestrians and the school children in particular are included within the updated CTMP. A Traffic Impact Assessment was undertaken on our behalf by SWECO in 2022 and the recommendations in the assessment form the basis of the traffic management proposals, including the proposed construction traffic route.

In summary some of the key commitments set out in the CTMP are:

- Employing a logistics manager to monitor and control traffic movements, control escort vehicles, liaise with the school bus service etc.;
- A convoy system will be in place picking up HGVs and deliveries before they reach Glenfarg and escorting them to the WTW. The escort vehicle will travel at a maximum of 15mph on the private road. This will ensure speed limits are maintained and manage the interface with non-construction traffic, pedestrians and equestrians;
- The proposal to change priorities at Church Brae and Ladeside Roads has been dropped;
- One way system will not be required as HGVs movements will be managed with vehicles to be escorted off site, this will reduce the proposed extent of parking restrictions and impacts on Glenfarg village;
- A crossing attendant will be employed at the junction of Church Brae and Ladeside during school start up and end periods;
- Improvements will be made to existing passing places and verges will be cleared to maximise the width of roads, visibility and passing opportunities;
- Pre-start and dilapidation surveys of the road network will be carried out, in conjunction with the Roads Authority and any necessary repairs undertaken; and
- Winter maintenance arrangements for Church Brae and the private road to the WTW will be in place.

Parking

Church Brae will have a full parking restriction but with the management of HGV movements no restrictions are required on Greenbank and Ladeside. We are exploring the option of providing alternative parking close to Church Brae and are working to secure agreement with owners.

Operational Traffic

The operation of the extended WTW will result in additional traffic movements between the existing treatment works and new site but is not envisaged to have an overall impact on vehicle movements through Glenfarg. The intention is that the road widening and verge improvements will be retained permanently to assist the flow of operational traffic.

Protection of Structures

Glendy Mill Bridge is a listed structure. In order to protect it from construction vehicles it is proposed to install a Bailey bridge over the bridge for the duration of construction. This is the same approach as was taken previously for installation of the DAF building at the works.

Condition surveys of properties will be undertaken prior to and following construction for properties along Church Brae and Ladeside where identified as being at risk

Residential Amenity

We propose to limit construction hours to 8 to 6 Monday to Friday with any working at the WTW beyond these hours being agreed by exception and communicated to residents. All lighting at the WTW for work in poor light conditions will be angled to face into the site.

Escorting vehicles and maintaining a low speed will help limit noise disturbance from construction traffic. All parked vehicles not being used or waiting to be offloaded will be required to switch off their engines if required to wait longer than 5 minutes to avoid disturbance from idling engines. Temporary improvements to reduce noise from the cattle grid at the WTW are being investigated.

A baseline air quality survey will be undertaken at points within the village.

In respect of operational noise at the WTW a new generator designed to modern standards is being installed in a revised location over 100m further from the residential properties than the current older generator. A background noise survey has been carried out and Noise mitigation measures are being employed at the new pumping station.

There is existing lighting at the WTW which would be enhanced by some task lighting angled into the site at the pumping station and backwash tank. At the filter beds site all lighting will be directed into the site to avoid light pollution. There will be no permanently switched on lighting.

Suitable waste management systems and facilities will be provided and there will be no disposal of waste to the river.

Natural Environment

Methods to protect the water environment, including the River Farg, during construction are covered in the Project Environmental Protection Plan submitted with the application. We note this plan was not been made visible to the public on the Perth and Kinross Planning website and have asked that it is. Liaison is ongoing with SEPA and any necessary licences will be applied for. Pollution prevention measures will be implemented during construction to negate adverse impacts to the River Farg during construction. These will follow current Scottish SEPA and CIRIA guidance.

Mitigation measures will be put in place for beaver, bats, red squirrels and otters as set out in the supporting statement and Project Environmental Plan. A further ecological walkover survey will be undertaken prior to work commencing on site and any additional mitigation measures recommended will be implemented. Nature Scotland are aware that beavers are active in the River Farg and a protected species licence will be applied for with appropriate steps taken to protect the beavers. The old buildings at the filter beds were surveyed for bats and they were found in the existing pump house. Mitigation will be developed, and any necessary consents will be obtained prior to any work commencing.

Planting Plans covering the filter beds area and WTW have been prepared but we note these are not yet visible on the PKC planning portal. These plans incorporate both screen planting and planting for biodiversity objectives using native tree and shrub species and wildflower grass seeding.

Work to widen roads along the access route involves digging out and reinforcing road verges. There will be no loss of mature trees and vegetation trimming along the route will be discussed with owners.

We hope this provides sufficient information to respond to the key points raised in the representations and allay some concerns. Should any further information be required please contact the undersigned.

Yours faithfully

Catherine Souter Bell
Scottish Water – Specialist Services Delivery Team