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Record of Determination A9 Evelix Cuthill Links Bridge

Contents

Project Details	3
Description	3
Location	5
Description of Local Environment	6
Population and Human Health	6
Biodiversity	6
Land	8
Soil	8
Water	8
Air	9
Climate Change	9
Material Assets.....	9
Waste.....	9
Cultural Heritage	10
Vulnerability of the Project to Risks	10
Description of Main Environmental Impacts and Proposed Mitigation	10
Population and Human Health	10
Biodiversity	11
Land	14
Soil	14
Water	14
Air	15
Climate Change	16
Material Assets.....	17
Waste.....	17
Cultural Heritage	18
Vulnerability of the Project to Risks	19
Cumulative Effects	19
Assessments of the Environmental Effects	20
Biodiversity	20
Statement of case in support of a Determination that a statutory EIA is not required	21
Annex A	23

Project Details

Description

BEAR Scotland has been commissioned by Transport Scotland to undertake a package of refurbishment works at A9 Evelix Cuthill Links Bridge (centre point NH 74782 87815). The bridge spans the River Evelix, approximately 1.5km north of the Dornoch Firth.

Vehicle restraint system (VRS) works are required on the bridge to bring the bridge parapets up to current standards and to repair deteriorated concrete on the parapet anchorages. In addition, the approach/departure safety barriers will be upgraded to comply with current standards. Works will be carried out in three phases which are detailed below:

Phase 1 – Concrete repairs

Concrete repairs will entail removal of and repair to deteriorated concrete on both the northbound and southbound edge beams of the bridge via the following procedure:

- Traffic management will be established.
- Temporary access arrangements (expected to consist of a suspended scaffolding system) will be established.
- Containment measures will be established around working areas.
- Delamination survey of the concrete edge beam will be undertaken to identify extent of concrete deterioration.
- Concrete repairs will be carried out using suitable repair material (e.g. normal flow concrete). Breakout of damaged concrete is expected to be carried out using mechanical means but may require hydro-demolition.
- Temporary access arrangements will be removed.

Phase 2 – Bridge parapet replacement

Parapet works will entail replacement of substandard aluminium BACO parapets on both the northbound and southbound sides of the bridge via the following procedure:

- Traffic management consisting of single lane closures with temporary traffic lights, a 30mph speed limit, and temporary safety barrier will be established on the bridge.
- Temporary edge protection will be established.
- Existing parapet mesh infill panels will be removed and safely disposed of.
- The existing aluminium parapets (28.4m total) will be removed and safely disposed of.
- Concrete repairs will be carried out on the top face of edge beams at the locations of the removed parapet post anchorages.

- New chemical anchorages will be installed into the concrete edge beams.
- New steel parapets (28.4m total) will be installed on the bridge.
- Safety barrier connectors will be installed to allow the connection of the parapets to Tranzflex SB transitions on approach and departure to the bridge.
- Grout will be installed under new parapet post base plates.
- Temporary edge protection will be removed.
- Class C parapet mesh infill will be installed.

Phase 3 – Safety barrier replacement

Safety barrier works will entail replacement of the safety barrier transitions between the new steel parapet and the existing safety barriers on both the northbound and southbound sides of the A9 via the following procedure:

- Traffic management will be established.
- A total of 32m of existing approach/departure safety barriers (16m on approach and 16m on departure) will be removed from both the northbound and southbound sides of the A9.
- A total of 32m of Tranzflex N2 W2 transitions will be installed on the bridge approach/departure (16m on approach and 16m on departure) between existing safety barriers/terminals and bridge parapets.
- Tranzflex transitions will be connected to the bridge parapets and existing safety barriers/terminals.
- Traffic management will be removed.

No in-stream works will be carried out. Temporary access is expected to be provided by a suspended scaffolding system attached to the bridge. Containment measures will be in place to ensure debris and pollutants do not enter the River Evelix. If hydro-demolition is required, no water will be abstracted from the River Evelix and any water used will be collected and disposed of at a licensed facility off site.

The scheme is currently proposed to commence in August-September 2021 for a duration of 20 days and works will be undertaken during daylight hours. Although the aim is for works to be completed by the end of September, there is a chance that Phase 3 of works could extend into October. The site compound will be located on the bridge within traffic management (e.g. lane closure).

The works are necessary to rectify substandard parapets and VRS on and adjacent to the bridge to comply with current standards and ensure the safety of road users. Alternatively, if repair works are not undertaken, concrete components of the bridge parapets would continue to degrade and road users would continue to remain at risk when crossing the bridge due to inadequate parapets and VRS system. No alternative options to repair have been identified.

The scheme does not fall within Annex I of the Environmental Impact Assessment (EIA) Directive 2011/92/EU as amended by 2014/52/EU. However, the scheme lies within Dornoch Firth National Scenic Area (NSA) and has connectivity with several designated sites, including the River Evelix Special Area of Conservation (SAC), Dornoch Firth and Morrich More SAC, Moray Firth SAC, Dornoch Firth and Loch Fleet Special Protection Area (SPA) and Ramsar site, and Dornoch Firth Site of Special Scientific Interest (SSSI). These sites are 'sensitive areas' as defined by the Roads (Scotland) Act 1984 as amended by the Roads (Scotland) Act 1984 (Environmental Impact Assessment) Regulations 2017. Therefore, the scheme is considered to be a 'relevant project' falling within Annex II of the above EIA Directive and has been screened against the criteria in Annex III of the EIA Directive. The conclusions have been recorded in this Record of Determination (RoD).

Location

The A9 Evelix Cuthill Links bridge is located on the A9 trunk road north of the Dornoch Firth in the Highland Council region (centre point NN 32229 33778). It spans the River Evelix.



Figure 1. Location of A9 Evelix Cuthill Links bridge.

Description of Local Environment

Population and Human Health

The scheme lies in a rural location north of the Dornoch Firth and west of Dornoch on the A9 trunk road. There is one residential property (Cuthill Steading) located 290m southeast of the works. There are no other properties within 300m of the scheme, although part of Carnegie Golf Course lies 200m southwest of the bridge.

There are no [National Cycle Network](#) (NCN) cycle routes, walking routes listed on [WalkHighlands](#), or [core paths](#) within the scheme extent. Paved footways are present across the span of A9 Evelix Cuthill Links Bridge only; they do not continue along the A9 carriageway.

Pedestrians and equestrians are unlikely to use the A9 at this location due to the high-speed nature of the traffic and the availability of more appropriate trails and bridleways in the surrounding countryside. However, cyclists may use the A9 within the scheme extent.

The scheme is in a rural location where noise and vibration levels will be primarily influenced by trunk road traffic and agricultural activities in the surrounding area. There are no designated [Candidate Noise Management Areas](#) (CNMAs) or Candidate Quiet Areas (CQAs) within proximity to the works location.

The A9 north of Inverness is a single carriageway trunk road that provides a key transport route to the north of Scotland. The national speed limit applies throughout the scheme.

Biodiversity

Designated Sites

There are several designated sites, including Natura 2000 sites (i.e. SACs and SPAs) present in the surrounding area of A9 Evelix Cuthill Links Bridge. A Habitats Regulations Appraisal (HRA) screening and consultation with NatureScot were undertaken to determine which of the following sites could have connectivity with the proposed parapet and VRS works at the bridge:

- River Evelix SAC
- Dornoch Firth and Morrich More SAC
- Dornoch Firth and Loch Fleet SPA
- Dornoch Firth and Loch Feet Ramsar site
- Moray Firth SAC
- Moray Firth SPA
- Loch Eye SPA
- Loch Eye Ramsar site
- Morangie Forest SPA

- Strath Carnaig and Strath Fleet Moors SPA
- Dornoch Firth SSSI

Based on the scale of works, distance to the scheme, and advice provided by NatureScot, the following sites were scoped out of the assessment and were not considered further:

- Dornoch Firth and Loch Feet Ramsar site
- Moray Firth SPA
- Loch Eye SPA
- Loch Eye Ramsar site
- Morangie Forest SPA

As the scheme has connectivity to the above designated sites, consultation with NatureScot was undertaken and a Statement to Inform Appropriate Assessment (SIAA) was completed as part of the HRA process to assess potential risks to the qualifying features of these sites as a result of the works.

Ecology Surveys

The BEAR Scotland NW Environment Team carried out a preliminary roost assessment (PRA) of the bridge for bat roost potential and a walkover survey in January 2020 to assess the potential for ecological constraints. Overall, the bridge was assessed as having moderate summer bat roost potential and high hibernation roost potential. Suitable structure for otter resting places was relatively lacking within the survey area due to modified and/or steep banks. The bridge and surrounding area offer suitable nesting habitat for birds. No signs of other protected or invasive non-native species were recorded. The bat and aquatic surveys were carried out by Jacobs in 2020 and are detailed under the relevant headings below.

A second site visit was carried out by the BEAR NW Environment Team on 13th May 2021 to update ecological survey results.

Bats

One WHI was carried out at height by Jacobs on 25th February 2020. No bats or evidence of bats were found.

Upon close inspection of the potential roost features during the first WHI, and considering the fact that works will take place out with the bat hibernation season and the potential roost features will not be destroyed by works, the bat-licensed ecologists at Jacobs confirmed that a second WHI would not be required prior to works.

Two bat activity surveys were carried out by Jacobs on the bridge during summer 2020 (30th June and 15th July). Both surveys were undertaken at dusk and no bat emergences were recorded during either survey. Low levels of foraging and commuting behaviour by one or a few common pipistrelles (*Pipistrellus pipistrellus*), soprano pipistrelles (*P. pygmaeus*), and *Myotis* sp. bats were recorded in the vicinity of the bridge, but no signs of roosting were observed. The surveyor noted large

amounts of pigeon droppings in both bridge pier galleries, but no active nests were recorded.

Aquatic Habitat

As there is a chance that works could extend into October (i.e. sensitive period for salmonids), consultation with the Kyle of Sutherland District Salmon Fishery Board (DSFB) was undertaken to identify any concerns regarding fish habitat or populations.

Land

The scheme lies within Dornoch Firth National Scenic Area (NSA), which is designated for the following qualities:

- The contrast between the enclosed west and the expansive east;
- Inhabited surrounds within a wilder backdrop of hills and moors;
- A wide diversity of woodland cover;
- A rich variety of alluvial lands, dunes and links;
- The ever-changing firth;
- The tranquillity of an undeveloped coastline; and
- Migdale, a microcosm of the wider Dornoch Firth.

Views from A9 Evelix Cuthill Links Bridge are expansive to the south, although the Dornoch Firth is not visible. Views of agricultural areas to the east, west, and north are slightly obstructed by woodland along the River Evelix.

Land cover in the surrounding area is dominated by improved grassland. Patches of woodland, inland waters, and coastal habitats are also present. The Carnegie Championship Links golf course is located to the southwest of the bridge.

Soil

The scheme is not located within a [Geological Conservation Review Site](#) (GCRS).

Bedrock geology within the scheme extents is recorded as Raddery Sandstone Formation – Sandstone, which is a sedimentary bedrock of a fluvial origin. The local environment was previously dominated by rivers.

Superficial geology within the scheme extent is recorded as Alluvium - Clay, Silt, Sand and Gravel, which are sedimentary deposits of a fluvial origin, suggesting that the local area was previously dominated by rivers.

Soils recorded within the immediate vicinity of the scheme are recorded as humus-iron podzols.

Water

The A9 Evelix Cuthill Links Bridge spans the River Evelix, which was classified by the Scottish Environment Protection Agency (SEPA) in 2018 as having 'Good'

overall status. The River Evelix flows into the Dornoch Firth via Loch Evelix to the east of the scheme. Loch Evelix is a component of the Dornoch Firth, which was classified by SEPA in 2018 as having 'Good' overall status.

The scheme falls within the boundary of the Dornoch Coastal and Dornoch groundwater bodies, both of which were classified by SEPA in 2018 as having 'Good' condition. The Dornoch groundwater body is also a Drinking Water Protected Area (Ground).

Air

The works are not wholly or partially located within an [Air Quality Management Area](#) (AQMA).

No air quality monitoring stations are located in proximity to the scheme, with the closest located approximately 42km southwest in Strath Vaich. Air pollution levels at the scheme location are likely to be similar to levels at this monitoring station due to the rural settings of both locations.

Air quality within the scheme extents is likely to be primarily influenced by trunk road traffic and agricultural activity in the area.

Climate Change

The Climate Change (Scotland) Act 2009 creates mandatory climate change targets to reduce Scotland's greenhouse gas emissions. BEAR Scotland have a Carbon Management Policy in place with the core aim of reducing the carbon footprint that the company measures and reports annually.

Material Assets

Transport Scotland has a statutory obligation to maintain Scotland's trunk road network in a safe condition for road users. The proposed works on the A9 Evelix Cuthill Links Bridge are required to bring the parapets and VRS barriers up to current standards and to repair concrete deterioration on the bridge edge beams. The following materials will be used to complete these works:

- Concrete for patch repairs and safety barrier post foundations
- Cement grout
- Steel rebar
- Timber (formwork for concrete patch repairs)
- Epoxy resin (concrete anchors for new parapets)
- Steel parapets

Waste

Waste materials will comprise old concrete, aluminium, and steel components of the existing bridge parapets. Materials will be recycled after use where possible. Expected waste to be recycled or removed from site to licensed facilities is listed below:

- Concrete removed from existing edge beams – to be removed from site as waste
- Aluminium from existing parapets – to be removed from site and recycled
- Steel from existing safety barriers and parapet components – to be removed from site and recycled

Cultural Heritage

According to [Pastmap](#), The Bridge is located just within the boundary of Skibo Castle Garden and Designed Landscape (GLD00343) in the southeast corner. There is one other feature of cultural heritage within 300m of the bridge: a findspot listed on both the Historic Environment Record (HER) and the Canmore databases. It is located 270m northwest of the bridge.

There are no other cultural heritage features, including Listed Buildings, Scheduled Monuments, Inventory Battlefields, or World Heritage Sites within 300m of the scheme.

Vulnerability of the Project to Risks

The following environmental factors were identified as potential risks to the project:

- Unidentified ecological constraints.
- Disturbance of protected species.
- Programme delays.

Description of Main Environmental Impacts and Proposed Mitigation

Population and Human Health

During works, activities undertaken on site may have temporary adverse impacts on local residents and road users as a result of vehicle noise and delays due to traffic management measures. However, there is one residential property located 290m from the bridge and no other properties within 300m of works. Considering the nature and scale of the works and with the following mitigation measures in place, the risk of significant impacts on population and human health is considered to be low.

- A traffic management plan will be developed in accordance with Chapter 8 of the Traffic Signs Manual to reduce disruption to vehicle travellers. Traffic management is expected to consist of lane closures with temporary traffic lights.
- Traffic management will include appropriate provisions for non-motorised users of the road such as pedestrians and cyclists who may take longer than motorised vehicles to travel the length of the traffic management.
- The Best Practicable Means, as defined in Section 72 of the Control of Pollution Act 1974 and BS5228-1:2009+A1:2014 Code of Practice for Noise and Vibration

Control on Construction and Open Sites, will be employed at all times during works.

- In general, works will be carried out during daylight hours.
- Good practice measures to reduce noise and vibration disturbance from works will be detailed in the Site Environmental Management Plan (SEMP) and adhered to on site.

With the above mitigation measures in place, the risk of significant effects on population and human health during the construction phase is considered to be low and this receptor is not considered further.

Biodiversity

Designated sites

The proposed works will be carried out directly over the River Evelix SAC, which also provides connectivity between the bridge and four other designated sites listed previously. Consequently, an SIAA was produced by BEAR Scotland's NW Environment Team to assess potential impacts of the works on the relevant designated sites as part of HRA process in relation to regulation 48 of the Conservation (Natural Habitats, &c.) Regulation 1994 as amended. The SIAA identified potential for Likely Significant Effects (LSE) on some qualifying features of the designated sites. Therefore, in addition to standard working practices for working in or near water, which are required to comply with The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) and are described further in the 'Water' section below, the SIAA includes mitigation measures (listed below) that will be adhered to on site to avoid Adverse Effects on Site Integrity (AESI) of nearby designated sites:

- Containment measures will be in place around working areas to ensure that materials and pollutants do not enter the River Evelix or surrounding environment.
- If hydro-demolition is required, no water will be abstracted from the River Evelix and any water used in hydro-demolition will be collected and removed from site for appropriate disposal.
- For any works undertaken in October (i.e. overwintering bird period), working hours will be restricted to between one hour after sunrise until one hour before sunset.

Bats

Proposed works include activities that could disturb bat roosts if present in the bridge. The works are planned to be carried out during the bat active season (April to October inclusive). The WHI and summer activity surveys carried out in 2020 did not record evidence of roosting bats, although moderate foraging activity was recorded during the summer surveys. Therefore, the bridge is not considered to support bat roosts during either the bat active season or hibernation season. As such, it is

expected that there will be no significant short-term or long-term negative impacts on the local bat populations as a result of works.

Terrestrial Ecology

The works are currently planned to commence in late August or September 2021, which is at the end of the main breeding bird season. If deemed necessary, nesting bird checks will be carried out prior to works commencing. In addition, there is potential for works to impact terrestrial mammals which may be present in the vicinity of works. The following mitigation measures will be in place during works to reduce the risk of impacts on terrestrial mammals:

- Site personnel should remain vigilant for protected species and are instructed not to approach or touch any animals seen on site.
- Toolbox talks on protected species and breeding birds will be provided to all site staff prior to works commencing. Briefings are to be clear and unambiguous, with all staff informed to stop works where a concern is raised. Works may not recommence until advice from an appropriately qualified ecologist is sought and appropriate mitigation is in place, where required.
- If deemed necessary, checks for nesting birds will be carried out prior to works commencing.
- If an active bird nest (e.g. eggs present, adult sitting on nest) is identified in the vicinity of works, all works within 30m must stop until the BEAR Scotland NW Environment Team can provide advice.
- Where protected mammals are encountered or move within 50m of the active works, works will cease until the animal(s) move at least 50m away from the construction site or until the BEAR Scotland NW Environment Team can provide advice.
- All material, machinery, and equipment will be subject to checks for resting mammals daily prior to any works commencing to prevent entrapment or injury of any mammals.
- A 'soft start' will be implemented on site each day. This will involve switching on vehicles and checking under/around vehicles and the immediate work area for mammals prior to works commencing to ensure none are present and that there is a gradual increase in noise.
- Any excavations, exposed pipes/drains, or areas where an animal could become trapped (e.g. storage containers) will be covered over when not in use, at the end of each shift, and following completion of works to avoid mammals falling in and becoming trapped.

- Suitable passage for otter under the bridge must be maintained for the duration of works.
- If fencing is utilised at any point during works, a gap of 200mm from ground level must be provided, allowing free passage for mammals and preventing entrapment.
- If night working or night deliveries are required, artificial lighting should be directed away from the River Evelix, woodland, or other suitable habitat as much as is safe and reasonably practicable.

Aquatic Habitat & Fish Populations

Although in-stream works are not required to complete parapet and VRS works, there is potential for noise and vibration caused by works to impact species which are protected within the River Evelix SAC. In addition to the mitigation measures listed above for Designated Sites, the following mitigation measures will be in place during works to reduce the risk of impacts on aquatic habitat and fish populations:

- No in-stream works are permitted.
- All conditions of All conditions of SEPA's General Binding Rules (GBRs) 6,9, and 13 will be adhered to during works.
- Relevant SEPA Pollution Prevention Guidelines (PPGs) and Guidance for Pollution Prevention (GPPs) must be strictly adhered to, in particular PPG1: Understanding your environmental responsibilities – good environmental practices; GPP 5: Works and maintenance in or near water; PPG 6: Working at construction and demolition sites; PPG 7: Safe storage - The safe operation of refuelling facilities; GPP 13: Vehicle washing and cleaning; GPP 21: Pollution incident response planning; GPP 22: Dealing with spills.
- No discharges into the water environment are permitted and containment measures must be in place to ensure this, particularly in regard to wet cement.
- All mitigation measures listed under the 'Water' heading below will be followed to reduce the risk of pollution and other impacts to the water environment.
- Free passage for migratory fish in the River Evelix must be maintained for the duration of works.
- Good practice measures will be detailed in the SEMP and adhered to on site.

The Biodiversity receptor is considered further in the 'Assessment of the Environmental Effects' section below due to the following factors:

- Production of an SIAA assessing potential impacts of works on the River Evelix SAC and several other designated sites with connectivity to the scheme.

- Potential for impacts on terrestrial mammals, freshwater fish and nesting birds.
- Requirement for consultation with NatureScot
- Requirement for consultation with the Kyle of Sutherland DSFB.

Land

There is potential for minor, temporary visual impacts to Dornoch Firth NSA as a result of works. However, the Dornoch Firth and coastline (two of the main components of the NSA) are not visible from the A9 Evelix Cuthill Links bridge and views to the east, west, and north from the bridge are somewhat obstructed by woodland along the River Evelix. The scheme is of short duration and will be carried out from the existing A9 carriageway; therefore, land use will not change as a result of the works and no land take is required. Works are currently planned to commence in late August or September 2021, which is out with the main summer tourist season. In addition, NatureScot did not raise any concerns regarding the NSA during consultation for designated sites. Considering the nature and small scale of works and with the following mitigation measures in place, the risk of significant impacts to land and the Dornoch Firth NSA is considered to be low.

- Throughout all stages of the works, the site must be kept clean and tidy, with materials, equipment, plant and wastes appropriately stored, reducing the landscape and visual effects as much as possible.
- Works are to avoid encroaching on land and areas where work is not required or does not have permission to do so. This includes general works, storage of equipment/containers and parking.
- Where applicable, upon completion of the works, any damage to the local landscape (i.e. damage to grass verges or hardstanding of the A9) should be reinstated as much as is practicable.
- The working area and site compound location will be appropriately reinstated following works and the site will be left clean and tidy following construction.

With the above mitigation measures in place, the risk of significant effects on land and the Dornoch Firth NSA during the construction phase is considered to be low and this receptor is not considered further.

Soil

Proposed repair works will take place from the deck of the A9 Evelix Cuthill Links Bridge and/or a suspended scaffolding system. There will be no excavations during construction and the scheme is not located within a GCRS. Therefore, impacts on soils or geology are not expected as a result of parapet and VRS works and this receptor is not considered further.

Water

There is potential for temporary adverse impacts on the water environment due to the risk of pollution incidents during works. Potential contaminants include concrete

debris, fuel and oils from mechanical plant, and dirty water run-off from the construction site. Standard working practices to comply with The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) for works in or near water will be detailed in the Site Environmental Management Plan (SEMP) and adhered to on site. These measures include the following:

- All conditions of SEPA's General Binding Rules (GBRs) 6,9, and 10b will be adhered to during works.
- Pollution control measures, including relevant SEPA Pollution Prevention Guidelines (PPGs) and Guidance for Pollution Prevention (GPPs), as well as other good practice measures for working in or near water, will be detailed in the SEMP and adhered to on site to prevent sediment or other materials entering the water environment.
- No discharges into any watercourses or drainage systems are permitted and appropriate containment measures must be in place to prevent any loss of construction materials into the water environment (e.g. dust, debris, wet concrete). Any dust, concrete debris, or other materials produced during works must be contained and removed from site to be disposed of appropriately.
- If hydro-demolition is required, no water will be abstracted from the River Evelix and any water used will be collected, contained, and appropriately disposed of off-site.
- During concrete repairs, wet cement must not be allowed to discharge into drains, watercourses or waterbodies. Concrete batching should be carried out on an impermeable surface and at least 10m away from drains and watercourses.
- The subcontractor is required to produce an incident response plan for dealing with spills or environmental incidents. The incident response (contingency) plan will be put in place to minimise the risk from pollution incidents or accidental spillages. All necessary containment equipment, including suitable spill kits (for oil and chemicals) and floating booms (designed to retain oil), will be available on site, quickly accessible if needed, and staff trained in their use.

With the above mitigation measures in place, the risk of significant effects on soils during the construction phase is considered to be low and this receptor is not considered further.

Air

There is potential for short-term negative impacts on air quality during works. Activities undertaken on site may cause dust and particulate matter to be emitted to the atmosphere. However, considering the nature and small scale of the works as well as the following mitigation measures, the risk of significant impacts to air quality is considered to be low.

- Appropriate containment measures must be in place to prevent pollutants from entering the environment.
- All plant, machinery and vehicles associated with the scheme must be maintained to the appropriate standards and must switch their engines off when not in use.
- The movement of dusty material will be minimised by appropriately planning material movements.
- A designated laydown area will be established at the site compound location.
- All delivery vehicles carrying material with dust potential will be covered when travelling to or leaving site, preventing the spread of dust beyond the work area.
- Material stockpiles will be reduced as much as reasonably practicable by using a 'just in time' delivery system. All material will also be stored on made ground (e.g. within the A9 carriageway boundary) and, where feasible, 10m away from potential pollution pathways such as drains and watercourses.
- Cement bags will remain closed when not in use to prevent cast-off to the surrounding environment.
- Any stockpiled material on site will be monitored daily to ensure no risks of dust emissions exists. Where a risk of dust emissions exists from stockpiles, these are to be dampened down. This is likely to require the use of mobile water bowsers.
- Materials should be removed from site as soon as is practical.
- Good housekeeping will be employed throughout the work.
- All construction activities will operate in line with good practice measures for construction as outlined in the SEMP.

With the above mitigation measures in place, the risk of significant effects on air quality during the construction phase is considered to be low and this receptor is not considered further.

Climate Change

During scour repair works, there is potential for impacts as a result of the emission of greenhouse gases through the use of vehicles and machinery, material use and production, and transportation of materials to and from site. However, considering the nature and small scale of the works as well as the following mitigation measures, the risk of significant impacts to climate is considered to be low.

- BEAR Scotland will adhere to the company's Carbon Management Policy.
- BEAR Scotland will undergo annual CEEQUAL Assessment.

- Where possible and in line with Covid-19 restrictions, construction operatives will be encouraged to car-share, used organised company transport or public transport, reducing greenhouse gas emissions.
- All plant, machinery and vehicles associated with the scheme must be maintained to the appropriate standards and must switch their engines off when not in use to reduce and control emissions.
- Where possible, materials are to be sourced locally to reduce greenhouse gas emissions associated with materials movement.

With the above mitigation measures in place, the risk of significant effects on the climate during the construction phase is considered to be low and this receptor is not considered further.

Material Assets

There is potential for impacts as a result of resource depletion through use and transportation of new materials. However, materials will be sourced locally where possible and provided that the following mitigation measures are in place, significant impacts on material assets are not anticipated as a result of works:

- Materials will be sourced from recycled origins as far as reasonably practicable within design specifications.
- Care will be taken to order the correct quantity of required materials to prevent the disposal of unused materials.
- Where possible, minimal packaging should be requested on required deliveries to reduce unnecessary waste and production of packaging materials.

With the above mitigation measures in place, the risk of significant effects on material assets during the construction phase is considered to be low and this receptor is not considered further.

Waste

There is potential for impacts during works as a result of the improper storage or disposal of waste. However, provided the following mitigation measures are in place, the risk of significant impacts as a result of the works is considered to be low.

- The waste hierarchy (Reduce, Reuse, Recycle and Dispose) will be employed throughout the construction works.
- The subcontractor will adhere to waste management legislation and ensure they comply with their Duty of Care.
- Containment measures will be in place to prevent debris or pollutants from entering the surrounding environment.

- All wastes and unused materials must be removed from site in a safe and legal manner by a licensed waste carrier upon completion of the works. The appointed waste carrier must have a valid SEPA waste carrier registration, a copy of which will be provided to and retained by BEAR Scotland as early as possible.
- All appropriate waste documentation must be present on site and be available for inspection. A copy of the Duty of Care paperwork should be provided and filed appropriately in accordance with the Code of Practice (as made under Section 34 of Environmental Protection Act 1990 as amended).
- Re-use and recycling of waste will be encouraged and the subcontractor will be required to fully outline their plans and provide documentary evidence for waste arising from the works (e.g. waste carrier's licence, transfer notes, and waste exemption certificates).
- Staff will be informed that littering will not be tolerated. Staff will be encouraged to collect any litter seen on site.
- Where applicable, all temporary signage will be removed from site on completion of the works.
- Any hazardous or special waste subject to the Control of Substances Hazardous to Health (COSHH) Regulations 2002 (as amended) should be removed from site by a specialised waste carrier. COSHH waste should not be mixed with general waste and/or other recyclables. Any contaminated ground as a result of the works should be removed and transferred off site as special waste.

With the above mitigation measures in place, the risk of significant effects to the environment due to waste produced during the construction phase is considered to be low and this receptor is not considered further.

Cultural Heritage

Although the bridge lies just within the boundary of Skibo Castle GDL, the works will be restricted to the A9 carriageway boundary and do not entail any vegetation clearance. Therefore, the character of the GDL will not be affected. There is only one other feature of cultural heritage within 300m of the scheme, located 270m northwest of the bridge. Works will be restricted to the A9 Evelix Cuthill Links Bridge and A9 carriageway; therefore, the risk of significant impacts to cultural heritage is considered to be low provided that the following mitigation measures are in place.

- There shall be no parking of construction vehicles, placement of plant, or storage of materials adjacent to walls, buildings, or fences.
- People, plant, and materials should, as much as is reasonably practicable, only be present on areas of made/engineered ground. Where access out with these areas is required for the safe and effective completion of the scheme, it should be reduced as much as possible and ideally be limited to access on foot.

- All site personnel are to be briefed on the importance of archaeological finds and are instructed, as part of the site induction, to inform the site supervisor where potential finds are made.
- Should any unexpected archaeological evidence be discovered during works, construction activities in the vicinity should be halted, the area of interest should be cordoned off, and the BEAR Scotland NW Environmental Team should be contacted to arrange a competent archaeologist to survey the site.

With the above mitigation measures in place, the risk of significant effects on cultural heritage features during the construction phase is considered to be low and this receptor is not considered further.

Vulnerability of the Project to Risks

There is potential for minor impacts on the project as a result of environmental risks such as the discovery of a protected species on site, pollution incidents, or delays to the programme. However, a range of ecological surveys has been carried out prior to works to identify potential risks to protected species and mitigation measures will be adhered to during works. There will be no in-stream works and containment measures will be in place to reduce the risk of pollution incidents. The works have been timed for the least sensitive period of the year for several ecological receptors, including qualifying features of nearby designated sites. Consultation with NatureScot and the Kyle of Sutherland DSFB was carried out to identify additional mitigation measures (e.g. restricted working hours) if works extend into October, which is a more sensitive period for overwintering birds and freshwater fish. These measures, along with standard working practices, will be detailed in the SEMP and adhered to on site. Therefore, the vulnerability of the project to risk is considered to be low.

- A Site Environmental Management Plan (SEMP) has been produced by BEAR Scotland which sets out a framework to reduce the risk of adverse impacts from construction activities on sensitive environmental receptors. The subcontractor will comply with all conditions of the SEMP during works and may be subject to audit throughout the contract.

Cumulative Effects

A search of the [Highland Council Planning Portal](#) showed several applications for alterations to private properties in the village of Dornoch. All of these are located over 4.6km from the bridge and are minor in scale. There are also a few applications to erect houses on single lots in Dornoch as well as an application for a new residential development on the northern side of the village of Dornoch. No decision has yet been made on the proposed residential development; therefore, if planning permission is granted, works are unlikely to go ahead in the near future. One other planning application for alteration of a retaining wall was identified at Skibo Castle, approximately 1.75km northwest of the scheme. No other planning applications were identified in the vicinity of the scheme.

BEAR Scotland has been commissioned by Transport Scotland to carry out repair works on the A9 Mound Sluices, which are located approximately 11km (straight-line distance) north of A9 Evelix Cuthill Links Bridge. Works at A9 Mound Sluices are currently scheduled to commence in summer 2021.

Due to the distance of the A9 Evelix Cuthill Links Bridge from A9 Mound Sluices and the minor alteration proposals in Dornoch and Skibo, the risk of in-combination or cumulative impacts on environmental receptors is low.

The proposed works will bring the bridge parapets and VRS system up to current standards, improve the condition of the bridge, and protect against future deterioration of the structure. Consequently, carrying out these maintenance works now will reduce the risk that additional major refurbishment works will be required in the future. This in turn will reduce the amount of work required at this location on the River Evelix. Therefore, it is not expected that the works will contribute to long-term significant cumulative effects on the environment in the vicinity of A9 Evelix Cuthill Links Bridge.

Assessments of the Environmental Effects

This assessment has identified potential effects on one environmental receptor (Biodiversity) as a result of the proposed work, which is considered in further detail below.

Biodiversity

The Biodiversity receptor is considered further in this section due to the following factors:

- Production of an SIAA assessing potential impacts of works on the River Evelix SAC and several other designated sites with connectivity to the scheme.
- Potential for impacts on terrestrial mammals, freshwater fish and nesting birds.
- Requirement for consultation with NatureScot
- Requirement for consultation with the Kyle of Sutherland DSFB.

Designated Sites and consultation with NatureScot

As part of the HRA process, consultation was carried out with NatureScot and an SIAA was produced by BEAR Scotland's NW Environment Team to assess potential impacts of the works on the following designated sites, which were identified to have connectivity to the scheme at A9 Evelix Cuthill Links Bridge:

- River Evelix SAC
- Dornoch Firth and Morrich More SAC
- Dornoch Firth and Loch Fleet SPA
- Moray Firth SAC
- Dornoch Firth SSSI

Although the Dornoch Firth SSSI is not a Natura 2000 site, it overlaps with Dornoch Firth and Morrich More SAC and Dornoch Firth and Loch Fleet SPA and was therefore considered as a component SSSI of these sites in the SIAA.

Based on advice from NatureScot, the SIAA concluded that there could be LSE on some of the qualifying features of each site.

As LSE were identified for several qualifying features, Appropriate Assessment was carried out for these features and mitigation measures were identified (listed previously in the 'Description of Main Environmental Impacts and Proposed Mitigation' section) to ensure that the works will not result in AESI for any of the designated sites.

All mitigation measures detailed in the SIAA will be included in the SEMP and adhered to during works. With these measures in place, there will be no AESI on the above designated sites as a result of works.

Terrestrial mammals and nesting birds

A range of ecological surveys have been carried out on the A9 Evelix Cuthill Links Bridge to inform the assessment of potential impacts of works on terrestrial mammals and nesting birds.

Summary

Based on the above assessment and provided that the mitigation measures and standard working practices detailed above and in the SEMP are adhered to during works, any impacts on the 'Biodiversity' receptor resulting from the proposed works at A9 Evelix Cuthill Links Bridge are expected to be minor, temporary, and not significant.

Statement of case in support of a Determination that a statutory EIA is not required

This is a relevant project in terms of section 55A(16) of the Roads (Scotland) Act 1984 as it is a project for the improvement of a road and the completed works (together with any area occupied by apparatus, equipment, machinery, materials, plant, spoil heaps, or other such facilities or stores required during the period of construction)—

Do not exceed 1 hectare in area; but

are situated wholly within Dornoch Firth NSA, which is a sensitive area within the meaning of regulation 2(1) of the Environmental Impact Assessment (Scotland) Regulations 1999; and

have connectivity with several designated sites, which are sensitive areas within the meaning of regulation 2(1) of the Environmental Impact Assessment (Scotland) Regulations 1999.

The project has been subject to screening using the Annex III criteria to determine whether a formal Environmental Impact Assessment is required under the Roads (Scotland) ACT 1984 (as amended by The Roads (Scotland) Act 1984 (Environmental Impact Assessment) Regulations 2017). Screening using Annex III

criteria, reference to consultations undertaken and review of available information has not identified the need for a statutory EIA.

The project will not have significant effects on the environment by virtue of factors such as:

Characteristics of the scheme:

- The works will be temporary, localised, and short-term (less than 2 months in duration) and will be completed during daylight hours.
- The works will not damage or alter the footprint of A9 Evelix Cuthill Links Bridge.
- The works do not include any excavations or in-stream works.
- Containment of the working area will be in place to prevent debris or pollutants from entering the surrounding environment.

Location of the scheme:

- The total working area is less than 1ha.
- Although the scheme lies within Dornoch Firth NSA, the works will not result in altered views from the A9, and minor impacts to views during the construction phase will be temporary and short-term.
- Although the scheme has connectivity to several Natura 2000 sites, the HRA assessment and SIAA approved by NatureScot and submitted to Transport Scotland concluded that works would not result in AESI on nearby designated sites.
- Land use will not change as a result of the works.
- The site compound will be located within the A9 carriageway boundary.
- The scheme is not located within a densely populated area.

Characteristics of potential impacts of the scheme:

- Any potential impacts of the works are expected to be temporary, short-term, and limited to the construction phase.
- The HRA assessment and SIAA approved by NatureScot and submitted to Transport Scotland concluded that works would not result in AESI on nearby designated sites.
- Measures will be in place to ensure appropriate removal and disposal of waste.
- The SEMP will include plans to address environmental incidents.
- Mitigation measures detailed above and in the SEMP will ensure no significant negative impacts on sensitive receptors.

Annex A

“sensitive area” means any of the following:

- land notified under sections 3(1) or 5(1) (sites of special scientific interest) of the Nature Conservation (Scotland) Act 2004
- land in respect of which an order has been made under section 23 (nature conservation orders) of the Nature Conservation (Scotland) Act 2004
- a European site within the meaning of regulation 10 of the Conservation (Natural Habitats, &c.) Regulations 1994
- a property appearing in the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention for the Protection of the World Cultural and Natural Heritage
- a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979
- a National Scenic Area as designated by a direction made by the Scottish Ministers under section 263A of the Town and Country Planning (Scotland) Act 1997
- an area designated as a National Park by a designation order made by the Scottish Ministers under section 6(1) of the National Parks (Scotland) Act 2000.



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