



**TRANSPORT
SCOTLAND**
CÒMHDHAIL ALBA

Environmental Impact Assessment Record of Determination

**A9 South of the Mound -
Resurfacing**

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Project Details

Description

BEAR Scotland has been commissioned by Transport Scotland to carry out resurfacing works on a stretch of the A9 carriageway, near Loch Fleet, approximately 6km south of Golspie.

The construction work will involve the replacement of surface course, likely to include binder inlay, over an approximate length of 770m. The scheme covers an area of approximately 0.54ha.

The resurfacing procedure is as follows:

- Set up traffic management (TM) and mark out site
- Mill out old surface course
- Lay new surface course
- Roll surface and allow it to go off
- Mark out lining schedule on site
- Remove TM and open road
- Lining/studding may be carried out at a later date under mobile TM or lane closures.

The works are currently programmed to be completed within the 2023/2024 financial year (April 2023 to March 2024 inclusive) and are expected to commence on 6th May 2023. Works are expected to be completed over 7 days, operating between the hours of 07:00 and 19:00. Changes in the programme may result in the need for night works.

Traffic management (TM) will consist of single lane closures, facilitated by temporary traffic lights and a convoy working. If the programme changes, this may result in amendments to the exact TM requirements. Where required, alternative pedestrian routes will be included in the TM setup.

Location

The works are located on the A9 carriageway, 6km south of Golspie, within the Highland Council area (Figure 1). The scheme has the following approximate National Grid References (NGRs):

Scheme Start: NH 76739 97467 (southern extent)

Scheme End: NH 77245 97983 (northern extent)



Figure 1. Location and scheme extent of the proposed resurfacing works at A9 South of the Mound. Source: BEAR Scotland. F108 – Environmental Assessment Request (Scheme ref: 23-NW-0103-91).

Description of local environment

Air quality

The scheme does not fall within any Air Quality Management Areas (AQMA) ([Air Quality Scotland](#)) and no Air Quality Monitoring Stations are located in the vicinity of works ([Air Quality Scotland](#)). The nearest air quality monitoring station is located in Inverness, approximately 53km south of the scheme ([Air Quality Scotland](#)). Pollution

levels in the general vicinity of works are anticipated to be lower than those at the monitoring station in Inverness due to the remote nature of the scheme location. Baseline air quality at the scheme location is likely to be primarily influenced by traffic along the A9 trunk road.

No sites are registered on the Scottish Pollutant Release Inventory (SPRI) ([Scotland's Environment](#)) for air pollutant releases within 1km proximity of the scheme.

Average Annual Daily Flow (AADF) was estimated for the nearest traffic count point on the A9 carriageway located 1.1km north of the scheme in 2021, and accounted for 4640 vehicles, of which 7% were heavy goods vehicles (HGV) ([Road Traffic Statistics](#)).

Cultural heritage

A desktop study using PastMap ([PastMap](#)) identified that four features listed on the Historic Environment Records (HERs) database and three on the Canmore database are located within 300m of the scheme extents. 'The Mound Causeway' HER is located within the northern end of the scheme extent. All other features are set back at least 15m from the scheme.

All works are restricted to the A9 carriageway and are restricted to like-for-like replacement of the road surfacing material, therefore the works do not include any alterations that would affect the historic and architectural character of any of these features.

There are no World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas, Garden and Designed Landscapes or Inventory Battlefields identified within 300m of the scheme.

As the works taking place strictly within the existing man-made footprint, it has been determined that the proposed project does not carry the potential to cause direct or indirect impact to features of cultural heritage importance. Construction of the A9 road corridor is likely to have removed any archaeological remains that may have been present.

As such, impact has been assessed as being 'no change' and has been scoped out of requiring further assessment.

Landscape and visual effects

The scheme does not fall within a National Park (NP) or National Scenic Areas (NSA) ([Sitelink](#)).

The Landscape Character Type (LCT) within the southern scheme extent is categorized as 'Rounded Hills – Caithness & Sutherland' (no. 135) ([Scottish Landscape Character Types](#)), which is characterised by:

- Rolling hills forming broad, subtly rounded summits but with some more pronounced hills also occurring, these often featuring steeper slopes along the coast or where truncated by deep glens.
- Hills cut by numerous narrow burns and small lochans lie within dips, corries and on plateau summits.
- Predominantly dense heather ground cover and moorland grasses, but also some areas of bog.
- Fragments of broadleaf woodland in inaccessible locations.
- Scarcely settled with a largely uninhabited interior and widely scattered crofts and farms on lower slopes adjoining straths and farmed landscapes.
- Narrow glens and lower hill slopes often rich in archaeology with features such as standing stones, brochs and medieval townships.
- Wind farms located in more accessible and generally lower rolling hills, either close to extensive forestry or the high voltage transmission line aligned broadly parallel to the south-east Sutherland coast.
- Convex character of hill slopes limiting distant visibility and views of the hill tops when travelling through the landscape.
- Views into the interior of the hills very restricted.
- Strong sense of wild character can be experienced within the more remote and little modified parts of this landscape.

The northern scheme extent falls in the 'Strath – Caithness & Sutherland' LCT (no. 142), characterized by the following:

- Straths range from fairly straight deeply incised troughs to more winding valleys with a number of minor side glens.
- River terraces and hummocky lower side slopes a common feature.
- Water is a key characteristic with straths accommodating a central river meandering across the floodplain, often traced by clumps of birch and alder.
- Lochs in some straths, where a string of small lochs add to the scenic richness of the lower strath.
- Areas of wetland often present on the strath floors.
- Smooth and fairly large pastures the predominant land cover on the floodplains of the straths, commonly enclosed by wire fences.
- Semi-improved pastures, heather and grass moorland and coniferous plantations covering lower side slopes.
- Increasing extent of moorland and woodland generally further up the straths, where the floodplain narrows and settlement is sparser.

- Smaller strip-fields present on often hummocky, lower side slopes and associated with croft houses arranged in linear groups raised on terraces above the floodplain and sometimes backed by woodland.
- Some crofts within the Straths more randomly dispersed or staggered on lower hill slopes.
- Occasional small farms located in the broader and more fertile parts of the straths.
- Settlement generally denser within the lower reaches of many straths, especially at bridging points, on the coast and close to major roads.
- Many areas rich in archaeology with cairns, roundhouses, brochs and old field systems, usually found on side slopes.
- Abandoned crofts, particularly within the upper straths and in narrow side glens.
- Focus in views from roads provided by a number of estate shooting lodges, and clustered, predominantly 19th Century, often estate style buildings.
- Narrow roads, commonly aligned along the edge of the floodplain, from which views are strongly channelled by the side slopes.
- Rounded Hills often forming prominent edges to the straths with shapely well-defined hills, providing a distinctive skyline and scenic backdrop.
- Highly scenic backdrop of mountains often revealed in some of the upper reaches of these straths.

Historic Environment Scotland's HLAMap ([HLAMap](#)) has highlighted the surrounding landscape to consist of a combination of managed woodland, plantations, rough grazing, designed landscape and a reservoir. However, Loch Fleet, a coastal waterbody which lies to the southeast of the scheme, has not been classified, though it is considered an important feature at the scheme location. The A9 carriageway forms an engineered linear corridor in the landscape.

Biodiversity

A desktop study using Nature Scot SiteLink ([SiteLink](#)) has noted the scheme extent lies adjacent to a number of sensitive areas, including:

- Dornoch Firth and Loch Fleet Special Protection Area (SPA) to the northwest and southeast of the scheme
- Dornoch Firth and Loch Fleet Ramsar Site to the northwest and southeast of the scheme. Features overlap with the SPA
- Loch Fleet Site of Special Scientific Interest (SSSI) located to the southeast
- Loch Fleet and Dornoch and Cuthill Sands Nature Conservation Order (NCO) 1995 – to the southeast
- Mound Alderwoods Special Area of Conservation (SAC) to the northwest
- Mound Alderwoods SSSI to the northwest

- Loch Fleet National Nature Reserve (NNR), located to the southeast of the scheme.

The NBN Atlas ([NBN Atlas](#)) has records of a number of bird species within 2km over a 10-year period.

The NBN Atlas ([NBN Atlas](#)) also holds records of invasive non-native species (INNS) of plants, as listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) (WCA), injurious weeds, as listed under the Weeds Act 1959, or invasive native perennials, as listed in the Trunk Road Inventory Manual:

- Broad-leaved dock (*Rumex obtusifolius*)
- Creeping thistle (*Cirsium arvense*)
- Montbretia (*Crocasmia x crocosmiflora*)
- Rosebay willowherb (*Chamerion angustifolium*)
- Spear thistle (*Cirsium vulgare*)

Transport Scotland's Asset Management Performance System (AMPS) noted no records of INNS or injurious weeds within 300m of the scheme.

Habitats in the surrounding area are dominated by aquatic habitats, with marine habitats to the east and inland surface water with associated wetland habitats to the northwest of the scheme ([Scotland's Environment](#)). A range of different broadleaved woodland types, including swamp woodland and non-riverine woodland, are located to the south and west of the scheme. Temperate shrub heathland, plantation woodland and arable land is located in the wider area. The grass verges within the scheme extent are fairly wide and accompanied by a belt of broadleaved trees and shrub along the northbound lane. Broadleaved trees changing to gorse can be found along the southbound verge.

An area of woodland listed as Ancient (of semi-natural origin) on the Ancient Woodland Inventory (AWI) ([Scotland's Environment](#)) is located to the west of the scheme, approximately 10m from the A9 trunk road boundary at its closest point.

A desktop study has been deemed sufficient for this assessment, and no ecological surveys have been carried out.

Geology and soils

The scheme does not lie within 300m of a Geological Conservation Review Site (GCRS) or a geological SSSI ([SiteLink](#)).

Bedrock within the scheme extents is comprised of Langwell Conglomerate Member (Conglomerate), which is a sedimentary bedrock ([BGS GeoIndex](#)).

Superficial deposits within the scheme extent are comprised of Raised Marine Deposits of Holocene Age (gravel, sand and silt) which are sedimentary deposits ([BGS GeoIndex](#)).

Soils within the scheme extent are recorded as alluvial soils ([Scotland's Soils](#)).

Material assets and waste

The proposed works are necessary to resurface the worn carriageway, likely requiring a binder inlay and reinstatement of road markings. Materials used will consist of:

- Asphaltic material
- Road-marking paint
- Bituminous emulsion bond coat
- Milled in road studs.

Wastes are anticipated to be planings from the carriageway surface course, which will be recovered for re-use (if not contaminated with coal tar) in line with BEAR Scotland's Procedure 126: The Production of Fully Recovered Asphalt Road Planings. The Contractor is responsible for the disposal of road planings and this will be registered prior to the start of works in accordance with a Paragraph 13(a) waste exemption issued by SEPA, as described in Schedule 3 of the Waste Management Licensing Regulations 2011.

Noise and vibration

The works are located in a rural setting with tree and shrub shelterbelts and some rock slopes flanking the trunk road for the majority of the scheme extent.

Apart from one property, all receptors in proximity to the scheme are screened from the scheme extent by sufficient vegetation, which provides a visual and noise barrier. The property which is afforded no screening is located adjacent to the northbound verge within the scheme extent.

The works do not fall within a Candidate Noise Management Area (CNMA) as defined by the Transportation Noise Action Plan ([TNAP](#)).

There is no noise modelled data available for the scheme extent ([Scotland's Noise Scotland's Environment](#)). However, given the rural nature of the area and the low AADT flow, it is considered likely that noise levels will be low, with noise mainly influenced by vehicles travelling along the trunk road.

Population and human health

There are approximately six residential properties located within 300m of the scheme. The closest property is located adjacent to the northbound carriageway of the A9 within the scheme extent, with no screening present. All other properties are screened from the scheme extent by a belt of tree and scrub, providing a visual and noise barrier for the local residents.

There are no National Cycle Network (NCN) routes ([OS Maps](#)), core paths ([Scotland's Environment](#)) or walking routes as listed on WalkHighlands ([WalkHighlands](#)) within the scheme extents. There are also no paved footpaths, bus stops, or other pedestrian facilities along the A9 within the scheme extent.

One minor road and an access track diverge from the northbound carriageway within the scheme extent. One layby is also located along the northbound carriage way towards the end of the scheme.

Traffic management (TM) will consist of daytime lane closures with convoy. Full road closure is not expected and access to properties will be maintained.

The A9 Trunk Road, within the North West NMC, connects Perth with Thurso. It commences immediately north of Inveralmond Roundabout in Perth leading generally northwards for a distance of 357 kilometres to its junction with an unclassified road leading to Holborn Head lighthouse at Scrabster. The A9 is a mixture of single carriageway, '2+1' carriageway and stretches of two-lane dual carriageway. The A9 north of Inverness is a single carriageway trunk road and is a key route to the far north of Scotland.

The area is likely to attract a large number of outdoor recreationists and tourists, especially during the summer months, given its location on the popular North Coast 500 route. A free parking area is located just north of the scheme.

Road drainage and the water environment

There are no waterbodies classified by the Scottish Environment Protection Agency (SEPA) under the Water Framework Directive 2000/60/EC (WFD) spanned or culverted beneath the A9 within the scheme extent. However, one unnamed watercourse is culverted beneath the A9 towards the southern scheme extent, discharging into Loch Fleet. The watercourse is considered to be a minor tributary and has not been classified by SEPA.

Loch Fleet is a coastal waterbody (ID:200475) located to the southeast of the scheme, which was classified by SEPA in 2020 as having 'Good ecological potential'. Loch Fleet has been designated as a heavily modified water body on account of physical alterations that cannot be addressed without a significant impact on an airport or major transport route and protected habitats and species.

Loch Fleet, Mainland (ID:20331) is another coastal waterbody which is located to the northwest of the scheme and is connected to Loch Fleet at the Mound. Loch Fleet, Mainland was classified by SEPA in 2020 as having an overall status of 'Good' ([SEPA water environmental hub](#)).

There may be roadside drains/drainage ditches in the vicinity of the A9 within the scheme extent.

The scheme falls within the 'Dornoch Coastal' and 'Dornoch' groundwater bodies, which were classified by SEPA in 2020 as having 'Good' overall condition ([SEPA water environmental hub](#)).

This section of A9 is noted as having no risk of river flooding. Small patches of the trunk road towards the southern end of the scheme extent are associated with up to high likelihood (10% chance of flooding each year) of surface water flooding and land immediately beyond the southbound carriageway also has a high likelihood of coastal flooding associated with Loch Fleet([SEPA Flood Map](#)).

Climate

The Climate Change (Scotland) Act 2009 sets out the target and vision set by the Scottish Government for tackling and responding to climate change ([The Climate Change \(Scotland\) Act 2009](#)). The Act includes a target of reducing CO₂ emissions by 80% before 2050 (from the baseline year 1990). The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 amended the Climate Change (Scotland) Act 2009 to bring the target of reaching net-zero emissions in Scotland forward to 2045 ([Climate Change \(Emissions Reduction Targets\) \(Scotland\) Act 2019](#)).

The Scottish Government has since published its indicative Nationally Determined Contribution (iNDC) to set out how it will reach net-zero emissions by 2045, working to reduce emissions of all major greenhouse gases by at least 75% by 2030 ([Scotland's contribution to the Paris Agreement: indicative Nationally Determined Contribution - gov.scot \(www.gov.scot\)](#)). By 2040, the Scottish Government is committed to reducing emissions by 90%, with the aim of reaching net-zero by 2045 at the latest.

Transport Scotland is committed to reducing carbon across Scotland's transport network and this commitment is being enacted through the Mission Zero for Transport ([Mission Zero for transport | Transport Scotland](#)). Transport is the largest contributor to harmful climate emissions in Scotland. In response to the climate emergency, Transport Scotland are committed to reducing their emissions by 75% by 2030 and to a legally binding target of net-zero by 2045.

Policies and plans

This Record of Determination (RoD) has been undertaken in accordance with all relevant regulations, guidance, policies and plans, notably including the Environment and Sustainability Discipline of the Design Manual for Roads and Bridges ([Design Manual for Roads and Bridges \(DMRB\)](#)) and Transport Scotland's Environmental Impact Assessment Guidance ([Guidance - Environmental Impact Assessments for road projects \(transport.gov.scot\)](#)).

Description of main environmental impacts and proposed mitigation

Air quality

Construction activities associated with the proposed works have the potential to temporarily cause local air quality impacts. Activities undertaken on site may cause dust and particulate matter to be emitted to the atmosphere. However, taking into account the nature and scale of the works and the following mitigation measures, the risk of significant impacts to air are considered to be low.

- All plant, machinery and vehicles associated with the scheme will be maintained to the appropriate standards and will be switched off when not in use.
- Green driving techniques will be adopted, and effective route preparation and planning to be undertaken prior to works.
- 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 far as is reasonably practicable by using a 'just in time' delivery system. All material will also be stored on made ground.
- Any stockpiled material on site will be monitored daily to ensure no risks of dust emissions exists.
- Materials must be removed from site as soon as is practicable.
- Good housekeeping will be employed throughout the work.
- Drop heights to haulage vehicles and onto conveyors will be minimised.
- Surfaces will be swept where loose material remains following planing.

With the above mitigation measures in place, it is anticipated that any air quality effects associated with the proposed works are unlikely to be significant. This receptor is not considered further in this Record of Determination (RoD).

Landscape and visual effects

There is potential for minor, temporary visual impacts to the local landscape during the construction phase as a result of littering or obstructed views due to vehicles and machinery. However, proposed works will be restricted to like-for-like resurfacing of the A9 carriageway and will be carried out over a short period of time (7 days only) with the works moving progressively along the scheme extent. Land use will not

change as a result of the works. Furthermore, the scheme does not lie within an area of land designated as an NSA or NP. In addition, the following mitigation measures will be put in place during works:

- Throughout all stages of the works, the site will be kept clean and tidy, with materials, equipment, plant and wastes appropriately stored, reducing the landscape and visual effects as much as possible.
- The working area will be appropriately reinstated following works.
- Works will 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 must be reinstated as much as is practicable.
- The site will be left clean and tidy following construction.

With the above mitigation measures in place, it is anticipated that any landscape and visual effects associated with the proposed works are unlikely to be significant. This receptor is not considered further in this RoD.

Biodiversity

During road resurfacing, activities undertaken on site could potentially have a temporary adverse impact on biodiversity in the area as a result of an increased vehicle presence and the potential for disturbance to protected species and pollution of habitats.

The scheme is located within the vicinity of multiple designated sites for numerous features like non-breeding waterfowl assemblage, breeding bird assemblage, a number of coastal habitats and wet woodland. However, the Habitats Regulation Appraisal (HRA) concluded that the works would not result in any likely significant effects (LSE) upon the qualifying features of these by virtue of the following factors:

- All works are restricted to made-ground within the footprint of the A9 trunk road, with only 'like-for-like' replacement of road surface being undertaken, which will not involve any change of the natural landscape or its processes.
- There is no requirement for land take (or resources) or site clearance associated with the scheme and the works are limited to the existing A9 carriageway boundary, and as such stay within engineered ground.
- The works will not involve any in-stream works or any discharges to the natural water environment, and therefore there will be no change to water quality or impact on qualifying features.

- The trunk road along the scheme extents is flanked by roadside tree/shrub shelterbelts and rock cuttings, therefore the scheme extents is afforded visual and acoustic screening from the wider landscape.
- Disturbance levels due to works are unlikely to be significantly higher than disturbance due to normal traffic on the A9 and it is thought that any protected species in the area are likely to be habituated to existing levels of disturbance on the A9 due to traffic noise.
- All works will be completed over 7 days by utilising daytime working pattern (negating requirement for artificial lighting). As works will take place during the day only, a quiet period for the rest of the day will allow species to forage without potential noise or disturbance from the works.
- The resurfacing scheme is scheduled outwith the over-wintering bird season, and as such, will not affect overwintering birds.
- Works will not promote the known negative pressure on the designated species.
- No significant dust, particulate matter, and exhaust emissions (DPME) sources will be introduced by the works, and standard pollution prevention measures will be in place during works.

All works will be restricted to the A9 carriageway surface and will not entail any verge working. There are also no earthworks associated with the scheme, the scheme does not require permanent (or temporary) land-take, accommodation works, site clearance or locally gained resources, and there is no requirement to import topsoil. As such, there is limited potential to spread or introduce INNS, invasive native perennials, or injurious flowering plant species.

Pollution controls and good practice measures to reduce impacts of works on the local environment will be detailed in the Site Environmental Management Plan (SEMP) and adhered to on site. Therefore, with the following mitigation measures in place, the risk of significant impacts on biodiversity are considered to be low:

- Site personnel will remain vigilant for the presence of potentially unrecorded instances of INNS or injurious weeds in road verges throughout the works period. Should any INNS be identified in working areas, no works may take place within 7m of these areas until the BEAR Scotland Environmental Team can provide further advice on additional mitigation measures.
- Works will be strictly limited to areas required for access and resurfacing works. Unnecessary encroachment onto terrestrial or aquatic areas will not be tolerated.
- Site personnel must remain vigilant for the presence of any protected species throughout the works period. Should a protected species be noted during construction, works must temporarily halt until the species has sufficiently moved on. Any sightings of protected species must be reported to the BEAR Scotland Environmental Team.

- 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 species in the area are likely to be accustomed to road noise on the A9. Relevant toolbox talks for working with protected species will be included in the SEMP. The potential for significant species disturbance within the area of likely construction disturbance is therefore somewhat diminished.
- 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 the works to avoid animals falling in and becoming trapped.
- If fencing is utilised at any point during the works, a gap of 200mm from ground level will be provided, allowing free passage for mammals and preventing entrapment.

With the above mitigation measures in place, it is anticipated that any biodiversity effects associated with the proposed works are unlikely to be significant. This receptor is not considered further in this RoD.

Geology and soils

As a result of the works taking place strictly within the existing man-made footprint, it has been determined that the proposed project does not carry the potential to cause direct or indirect impact to geology or soils.

The following measures will be applied to on site:

- The parking of machinery/personnel and storage of equipment on road verges will be minimised as far as is reasonably practicable.
- Upon completion of the works, any damage to the local landscape (i.e. damage to grass verges) must be reinstated as much as is practicable.
- Best practise measures to prevent contamination of soils through loss of containment will be strictly adhered to.

With the above mitigation measures in place, it is anticipated that any geology and soils effects associated with the proposed works are unlikely to be significant. This receptor is not considered further in this RoD.

Material assets and waste

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 the following mitigation measures will be put in place:

- 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 must be requested on required deliveries to reduce unnecessary waste and production of packaging materials.

There is potential for impacts during works as a result of the improper storage or disposal of waste. The following mitigation measures will be put in place:

- 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.
- Uncontaminated road planings will be re-used or recycled under a SEPA Paragraph 13(a) waste exemption and in line with BEAR Scotland's Procedure 126: The Production of Fully Recovered Asphalt Road Planings.
- If the works encounter coal tar then this will be appropriately processed in line with Transport Scotland's Guidance Note on dealing with coal tar bound arisings ([Coal Tar Guidance](#)). This will include, but not be limited to:
 - Coal tar contaminated road planings will be classified as a Special Waste.
 - All waste will be appropriately segregated, with coal tar contaminated planings being kept separate from uncontaminated planings.
 - Coal tar contaminated road planings will be transported by a registered waste carrier and be accompanied by a SEPA-issued consignment note or code. SEPA will be notified, at least 72 hours

before and no longer than one month before, prior to Special Waste leaving site. It will be sent to a facility that holds suitable pollution prevention and control permits and waste management licences. Copies of consignment notes will be retained for a period of three years.

- Waste will be transported in a safe and secure manner to prevent the release of contaminated material en-route.
- All wastes and unused materials will be removed from site in a safe and legal manner by a licensed waste carrier upon completion of the works. The appointed waste carrier will 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 will be present on site and will be available for inspection. A copy of the Duty of Care paperwork must 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 must 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.

With the above mitigation measures in place, it is anticipated that any material assets and waste effects associated with the proposed works are unlikely to be significant. This receptor is not considered further in this RoD.

Noise and vibration

Construction activities associated with the proposed scheme works have the potential to cause noise and vibration impacts through the use of equipment and construction vehicles for the proposed activities. The works will employ a day-time working pattern, and the majority of the properties within 300m of the works are suitably screened from the scheme by intervening vegetation. The proposed scheme is anticipated to result in temporary minor noise impacts. The following mitigation measures will be put in place:

- The Best Practice Means, as defined in Section 72 of the Control of Pollution Act 1974, will be employed at all times to reduce noise to a minimum.
- On-site construction tasks will be programmed to be as efficient as possible, with a view to limiting noise disruption to local sensitive receptors.
- All site personnel will be fully briefed in advance of works regarding the need to minimise noise during works and of the site-specific sensitivities.
- All plant, machinery and vehicles will be switched off when not in use.
- All plant will be operated in such a way that minimises noise emissions and will have been maintained regularly to the appropriate standards.
- For any night works (if required due to change of the programme), the Environmental Health Officer (EHO) and local residents will be notified of works and provided with a 24-hour contact number for the BEAR Scotland Control Room.
- Where fitted, and where permitted under Health and Safety requirements, white noise reversing alarms will be utilised during construction.
- Where ancillary plant such as generators are required, they will be positioned so as to cause minimum noise disturbance. Where deemed necessary, acoustic screens will be utilised.

With the above mitigation measures in place, it is anticipated that any noise and vibration effects associated with the proposed works are unlikely to be significant. This receptor is not considered further in this RoD.

Population and human health

During construction, activities undertaken on site may have temporary adverse impacts on local residents, vehicle travellers, and non-motorised road users (NMUs) as a result of vehicle noise and delays due to traffic management measures. Local residential premises in proximity to the scheme are typically well screened from the scheme extents, with no local access likely to be obstructed by presence of works and TM. Road users will be informed of works through a media release, which will provide details of construction dates and times. The works will be of short duration (7 days) and will move progressively along the full scheme extent. With the following mitigation measures in place, the risk of significant impacts on population and human health is considered to be low:

- If access to local properties is restricted, then residents will be notified of the impending works. Information will provide contact details (office phone

number and e-mail address) for the Project Engineer as well as a 24-hour contact number for the BEAR Scotland Control Room.

- Any changes of schedule (e.g. change from daytime works to night-time works) will be communicated to local residents throughout the programme.
- Appropriate provisions / measures will be implemented within the traffic management to allow the safe passage of NMUs of all abilities through the site.
- Journey planning information will be available for drivers online at the trafficscotland.org website. Journey planning information will also be available for drivers online through BEAR's social media platforms.

With the above mitigation measures in place, it is anticipated that any population and human health effects associated with the proposed works are unlikely to be significant. This receptor is not considered further in this RoD.

Road drainage and the water environment

During resurfacing works, there is potential for temporary impacts on the water environment. Potential changes in water quality from pollution events (either by accidental spillage of sediments, particulate matter, chemicals, fuels or by mobilisation of these in surface water caused by rain or tidal movements) during works have the potential to have a direct or indirect effect on the surrounding waterbodies. The following mitigation measures will be put in place to reduce the risk of pollution incidents as a result of works:

- The scheme will not entail any in-stream works.
- Standard working practices to comply with The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) for works in or near water are detailed in the SEMP and will be adhered to on site.
- No discharges into any watercourses or drainage systems are permitted. Appropriate containment measures will be in place to prevent any loss of construction materials into the water environment.
- An incident response (contingency) plan will be put in place to reduce the risk from pollution incidents or accidental spillages. All necessary containment equipment, including suitable spill kits (for oil and chemicals) will be available on site, quickly accessible if needed, and staff trained in their use.
- All spills will be logged and reported. In the event of any spills into the water environment, all works will stop, and the incident will be reported to the project manager and the BEAR Scotland Environmental Team. SEPA will be informed of any such incident as soon as possible using the SEPA Pollution Hotline.

- All plant and equipment will be regularly inspected for any signs of damage and leaks. A checklist will be present to make sure that the checks have been carried out.
- Storage of hazardous material, oil and fuel containers will be distanced more than 10m away from any watercourses.
- If required, a designated refuelling area will be identified. Fuel bowsers will be stored on an impermeable area and will be fully bunded. This will be distanced more than 10m from any watercourses.
- During refuelling of smaller mobile plant, a funnel will be used, and drip trays will be in place. Care will be taken to reduce the chance of spillages. Spill kits will be quickly accessible to capture any spills should they occur. The ground / stone around the site of a spill will be removed, double bagged and taken off site as special contaminated waste.
- Generators and static plant may have the potential to leak fuel and / or other hydrocarbons and will have bunding with a capacity of 110%. If these are not bunded then drip trays must also be supplied beneath the equipment with a capacity of 110%.

With the above mitigation measures in place, it is anticipated that any road drainage and the water environment effects associated with the proposed works are unlikely to be significant. This receptor is not considered further in this RoD.

Climate

Construction activities associated with the proposed scheme works have the potential to cause local air quality 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. The following mitigation measures will be put in place:

- BEAR Scotland will adhere to their Carbon Management Policy.
- Local contractors and suppliers will be used as far as practicable to reduce fuel use and greenhouse gas emitted as part of the works.
- Where possible, materials will be sourced locally to reduce greenhouse gas emissions associated with materials movement, and waste will be disposed at local landfill.

With the above mitigation measures in place, it is anticipated that any climate effects associated with the proposed works are unlikely to be significant. This receptor is not considered further in this RoD.

Major Accidents and Disasters

The trunk road, within the scheme extents, is not at risk of river flooding and surface water flooding is limited to a small area. Although land adjacent to the A9 trunk road are at risk of coastal flooding associated with Loch Fleet, this does not include the A9 carriageway boundary itself.

Works are restricted to the made ground of the A9 carriageway and traffic management will be designed in line with existing guidance. The proposed works are anticipated to last only 7 days. Traffic management will consist of lane closure facilitated by temporary traffic lights and convoy working. Where required, alternative pedestrian routes will be included in the traffic management setup, to minimise impact of the works on NMUs.

These measures, along with mitigation measures and standard working practices, will be detailed in the SEMP and adhered to on site. The vulnerability of the project to risks of major accidents and disasters is considered to be low.

Assessment cumulative effects

The proposed works are not anticipated to result in significant environmental effects. Due to the nature of the proposed works, no cumulative effects are anticipated with any other developments in the vicinity. A search of the Highland Council Planning Portal ([Map Search](#)) identified no planning applications within 300m of the scheme.

A search of the Scottish Roads Works Commissioner's website ([Map Search](#)) has identified that no other roadworks are currently ongoing, or noted as being planned at the same time as this scheme, on the trunk road at the schemes location and within 3km of the scheme. Due to the nature of the proposed works, and absence of other developments in the vicinity or the works, there are no cumulative effects are anticipated.

BEAR Scotland programme all of their proposed works in line with appropriate guidance and contractual requirements. All schemes are programmed to take into account existing and future planned works, with a view of limiting any cumulative effects relating to traffic management. As a result of this exercise, where a potential for cumulative impacts is identified, BEAR will reprogramme schemes to avoid / limit any cumulative effects or will utilise existing traffic management to complete multiple schemes at once. This approach allows BEAR Scotland to effectively manage the potential cumulative effects as a result of traffic management, resulting in minimal disruption to users of the Scottish trunk road network.

Overall, it is unlikely that the proposed works will have a significant cumulative effect with any other future works in the area.

Assessments of the environmental effects

As detailed in the Description of Main Environmental Impacts and Proposed Mitigation section within this Record of Determination, there are no significant effects anticipated on any environmental receptors as a result of the proposed works.

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) are situated adjacent to a number of areas including a SPA, SAC, SSSI, Ramsar and NCO 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 (EIA) 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 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 total working area doesn't exceed 1 ha.
- Works are restricted to like-for-like replacement of worn road surface, with all works restricted to made-ground on the A9 carriageway surface.
- The works will be temporary, transient, localised, and completed during daytime hours on a rolling programme.
- Containment measures of the working area will be in place to prevent debris or pollutants from entering the surrounding environment.
- Works are not expected to result in significant disturbance to protected species that may be present in the wider area.
- In the event that INNS are found on site, measures to prevent potential INNS spread will be implemented.
- No in-combination effects have been identified.

- The risk of major accidents or disasters is considered to be low.
- By removing the carriageway defects this will provide this part of the A9 carriageway with another life cycle, and significantly improve the ride quality, which will result in safer conditions for road users.

Location of the scheme:

- Although the works are located adjacent to, or have connectivity to, multiple sensitive areas, the high-level HRA screening confirmed that the works will not result in LSE on the qualifying features of the SPA, SAC or Ramsar site.
- The scheme will not have a significant impact on the Mound Alderwoods SSSI, Loch Fleet NNR or Loch Fleet and Dornoch and Cuthill Sands NCO.
- The scheme is not located within any areas designated for landscape interests.
- The scheme is not located within a densely populated area.
- The scheme does not lie within any sites of historical, cultural, or archaeological significance.
- The scheme will be confined within the existing carriageway boundaries and as a result will not require any land take and will not alter any habitats or landscape.
- Any impacts to the local landscape during the construction phase will be minor, temporary and not considered significant. In addition, no operational impacts are anticipated.

Characteristics of potential impacts of the scheme:

- Any potential impacts of the works are expected to be temporary, short-term, non-significant, and limited to the construction phase.
- Measures will be in place to ensure appropriate removal and disposal of waste.
- The SEMP will include plans to address environmental incidents.
- No impacts on the environment are expected during the operational phase as a result of works. The works are expected to result in positive impacts on road users during the operational phase.
- As the works will be limited to the like-for-like replacement of the structural components, there is no change to the vulnerability of the road to the risk or severity of major accidents/disasters that would impact on the environment.
- Mitigation measures detailed above (and in the SEMP) will be put in place with the objective to prevent and, if required, subsequently control any potential 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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