

A9 Dualling: Luncarty to Pass of Birnam

DMRB Stage 3 Environmental Statement

Appendix A6.3: Summary of Consultation Responses

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This appendix contains a summary of the key environmental input provided by consultees through the consultation process described in Chapter 6 (Consultation and Scoping). A full list of consultees is provided in Appendix A6.1 with a summary of the information provided.

Consultee	Summary of Consultee Feedback	Response
Statutory Consultees		
Historic Scotland <i>EIA Consultation Response</i> <i>18 April 2013</i>	Screening and Scoping Report <ul style="list-style-type: none"> Require ES to clarify how the programme and SEA will ultimately influence the final route and road design. Content with the proposed structure of the ES as set out in Chapter 19 of the screening and scoping report. 	<ul style="list-style-type: none"> Consideration of the SEA outcomes and project programme addressed in the ES.
	Baseline Information <ul style="list-style-type: none"> Advised to consult Perth and Kinross Heritage Trust on category B and C listed buildings. 	<ul style="list-style-type: none"> Additional consultation with Perth and Kinross Heritage Trust was undertaken. Perth and Kinross Heritage Trust confirmed they were content with the proposals following review of the draft ES in February 2014.
	<ul style="list-style-type: none"> Scoping report identifies King's Stone, standing stone 90m SE of Denmarkfield Farm (index no 1556), as within the study area although this appears to be a discrepancy as it is not within the study area shown in figure 2. 	<p>King's Stone is not located within the study area, as defined by Annex 5 of DMRB. The list of sites proposed for inclusion in the assessment was agreed with Historic Scotland</p>
	<ul style="list-style-type: none"> Content with the list of sites proposed for inclusion in the assessment. Screening effect of forestry to be treated with caution in the assessment as subject to environmental and other land use changes. Should not be relied upon in assessment to provide permanent screening for setting effects. 	<ul style="list-style-type: none"> Noted and taken into account in the assessment.
	Murthly Castle Inventory GDL <ul style="list-style-type: none"> HS believe it to be beneficial that the following issues are considered in the ES in order to aid their understanding of the effect of the project on the Murthly Castle Inventory GDL: <ul style="list-style-type: none"> Effect of the widening of the A9 on any existing boundary walls/felling of mature specimen trees. Current boundary of the GDL does not accord with the form of the designed aspects of the Estate. On this basis, HS advise that the design of the road and any mitigation measures identified should take into account the features to the south of the Inventory boundary. Murthly Castle will be subject to two separate project level environmental assessments. Where designated cultural assets fall within multiple project level areas, studies are to take a coherent approach to the assessment and mitigation of effects on the Inventory GDL. 	<ul style="list-style-type: none"> The impacts on Murthly Castle Inventory GDL have been considered within Chapter 13 of the ES (Cultural Heritage). Historic Landscape Type 8 (HLT8) comprises elements of Murthly Castle Estate not included on the Inventory of GDL but associated with it. Mitigation for the potential impact on HLT8 is considered within Section 13.5 of Chapter 13. A statement is included in Chapter 13 stating that landscape design has been developed in line with the SEA Landscape and Access Environmental Design Principles and that the detailed design of the structures will be informed by strategic design guidance currently being prepared.

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Perth & Kinross Council <i>EIA consultation responses – 17 April 2013, 02 July 2013</i>	<ul style="list-style-type: none"> Information received on potentially contaminated land sites and petroleum register localities. Provided information on locality and use of 16no. potentially contaminated land sites. 50m on either side of the entire length of any current or disused railway line should be considered as potentially contaminated land. A general rule is to apply a buffer of at least 100m around the central grid reference for any potentially contaminated land point. Provided petroleum register localities details for 3no. sites. Drainage information received on the Bankfoot Flood Protection Scheme and the SUDS in Bankfoot and Luncarty. Information uploaded to Sharepoint. Plan of NVC data for Cairnleith Moss SSSI received from Biodiversity Officer. Correspondence on traffic data, access and working hours to inform the design. Access officer provided specific feedback on the emerging design, proposed crossing points and provision for NMUs. 	<ul style="list-style-type: none"> Comments taken into consideration as part of assessments reported in the following chapters: Chapter 8 (Geology, Contaminated Land and Groundwater); Chapter 9 (Road Drainage and the Water Environment); Chapter 10 (Ecology and Nature Conservation); and Chapter 16 (Effects on All Travellers). <p>Comments on the emerging design were taken into consideration and incorporated into the proposed design.</p>
Scottish Environment Protection Agency (SEPA) <i>EIA Consultation Response 03 April 2013</i>	<ul style="list-style-type: none"> SEPA keen to see any draft assessments or Environmental Statement (ES) chapters so that important issues are brought to their attention as soon as possible to allow quick resolution. <p>1. Flood Risk</p> <p>1.1 The development proposals should be assessed for flood risk from all sources in line with Scottish Planning Policy (Paragraphs 196-211), the functional flood plain will generally have a greater than 0.5% (1:200) probability of flooding in any year. Built development should not take place on the functional flood plain.</p> <p>1.2 Scottish Planning Policy provides guidelines and policies covering development in areas identified to be at risk of flooding under the "Risk Framework". Infrastructure should be designed and constructed to remain operational during floods. This should provide guiding principles for the design of the road.</p> <p>1.3 We understand that detailed Flood Risk Assessments are proposed for each watercourse crossing for this scheme. They should also consider any requirements for compensatory storage should the proposals result in any loss of functional flood plain. We understand that separate to this process a Strategic Flood Risk Assessment is being undertaken for the whole scheme which will inform how later stages of the project are assessed in terms of flood risk. We have provided separate advice on this directly to Halcrow.</p> <p>1.4 For your information, within the study area the Ordie Burn is the only watercourse that is crossed which has a water level and flow monitoring station on it. The SEPA gauging station is located immediately downstream of the existing A9 crossing, NGR NO 090 312. Water level and flow records are available for the Ordie Burn from 1986. The other watercourses that are crossed, including the Shochie Burn are ungauged.</p> <p>1.5 We note you have requested flow records for the major watercourses within the area. It is understood that the dualling of the A9 will require the existing crossings in the study area to be extended. The extended culverts should be of similar dimensions to the existing ones. It is anticipated that the data request is to inform the requirements for compensatory storage where the road embankment and culvert extensions may encroach into the 0.5% AEP (1:200) floodplains of the watercourses.</p>	<p>SEPA, SNH and Historic Scotland reviewed and provided comment on the draft ES. The comments provided have been addressed in the final ES. The Flood Risk Assessment (Appendix A9.2) has been updated in line with SEPA's comments and audited draft ES. Scottish Planning Policy is referred to in Chapter 9 (Road Drainage and the Water Environment).</p> <p>Scottish Planning Policy guidelines and policies are referred to in Chapter 9, Table 9.2.</p> <p>This is addressed within the Appendix A9.2 (Flood Risk Assessment).</p> <p>Taken into account in baseline assessment.</p> <p>Culverts and compensatory storage are addressed within the Appendix A9.2 (Flood Risk Assessment). Information on culvert extensions is provided in Appendix A9.5 (Watercourse Crossings).</p>

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SEPA <i>continued</i>	1.6 We do not hold any survey information or hydraulic models of the watercourses in the vicinity of the crossings. However we operated a gauging station on the Garry Burn at Loakmill, NGR NO 075 339, from 1986 until it was closed on May 2012. Water level and flow data is available for this location should this be useful as a donor station or the data used to support estimates for the ungauged watercourses.	Noted.
	1.7 We are generally satisfied that the Environmental Screening and Scoping Report states that an assessment is to be carried out to determine the impact that the proposed works may have on floodplain capacities and that consideration is to be given to mitigation works to address any potential increase in flooding. We would stress that if consideration is being given to increasing the conveyance capacities of any crossings then an assessment of potential increased flood risk downstream of the crossing point should be undertaken. We would also request that any changes of approach and exit angles to and from culverts be considered in terms of their impact on the channel and culvert conveyance capacities and potential to cause erosion impacts.	Assessment of potential increased flood risk downstream of crossing points is relevant to Ordie, Shochie and Broomhill culverts. This has been addressed within Appendix A9.2 (Flood Risk Assessment).
	1.8 We acknowledge that a request for data and information has been received via SEPA's Science Advice mailbox. This request will require input from Hydrometry services in addition to the input from the Flood Risk Hydrologist.	Noted.
	1.9 We appreciate the design of any replacement or new crossings are not yet finalised. We would expect that where existing crossings need to be extended or replaced that the capacity of these should be retained at the existing size as a minimum with consideration of any nearby sensitive receptors. For example where the capacity of a structure may be increased then consideration should be given to the consequences for flood risk downstream within the Flood Risk Assessment.	Capacity of crossing points are referred to in Chapter 9, Paragraphs 9.5.51. Further information is provided in Appendix A9.5.
	1.10 Any Flood Risk Assessment should be carried out following the guidance set out in the Annex to the SEPA-Planning Authority flood risk protocol. Our Technical flood risk guidance for stakeholders outlines the information we require to be submitted as part of a Flood Risk Assessment, and methodologies that may be appropriate for hydrological and hydraulic modelling. Our Flood Risk Assessment checklist should be completed and attached within the front cover of any flood risk assessments issued in support of a development proposal which may be at risk of flooding.	Technical flood risk guidance for stakeholders is referenced within Chapter 9, Paragraphs 9.2.10, 9.2.35, 9.2.38. This is also referenced in Appendix A9.2 (Flood Risk Assessment).
	1.11 During the meeting we noted your query regarding compensatory storage where works will impact upon the capacity of the functional flood plain. We would expect this to be assessed by way of each Flood Risk Assessment in line with the SEPA Technical Guidance document entitled: "Technical Flood Risk Guidance for Stakeholders".	Technical flood risk guidance for stakeholders is considered in Appendix A9.2 (Flood Risk Assessment).
	1.12 We would also expect the forthcoming Flood Risk Assessments to consider the impact of the construction phases and temporary structures which may be needed during the works. All non essential equipment and storage of materials should be kept out with the functional floodplain and this should be detailed within the Flood Risk Assessments.	Addressed in Chapter 9 (Road Drainage and the Water Environment).
	1.13 SEPA's preference is for surface water drainage devices to be located outwith the functional floodplain. Section 4.12 of our Planning advice on sustainable drainage systems (SUDS) states "SUDS can be accommodated on the functional flood plain only if they do not alter floodplain storage or functionality. In some cases, a flood risk assessment may be required to demonstrate this. If a pond, for example, is placed in the flood plain it may have a bund around it to protect it from inundation. Compensatory flood storage would have to be provided to cover any losses in flood storage due to the bunding. If no bund is provided, then flooding is likely to reach the SUDS. It is important that this will occur only for situations where no other alternative arrangements are possible and not within at least the 30 year return period flood level."	Addressed in Chapter 9 (Road Drainage and the Water Environment).
	1.14 The advice contained in this letter is supplied to you by SEPA in terms of Section 72 (1) of the Flood Risk Management (Scotland) Act 2009 on the basis of information held by SEPA as at the date hereof. It is intended as advice solely in terms of the said Section 72 (1). Our briefing note entitled: "Flood Risk Management (Scotland) Act 2009: Flood risk advice to planning authorities" outlines the transitional changes to the basis of our advice inline with the phases of this legislation.	Noted.

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SEPA <i>continued</i>	<p>2. Engineering Activities in the Water Environment</p> <p>2.1 We note the proposals to extend or replace existing watercourse crossings along with possible new watercourse crossings in some locations. As you are aware, these would be subject to control under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR). In order for us to advise on the likely consentability of the proposal the information on crossings would need to be included within the Environmental Statement.</p>	Information on proposals and justification for crossing extensions is provided in Appendix A9.5.
	2.2 As previously discussed we would welcome it if you could develop some guiding principles or guidance document which sets out the types of watercourse crossings you feel would be appropriate for different watercourse sizes or natures. Whilst there maybe some site specific constraints or flood risk issues which require a site specific solution it would be good to agree general guiding principles from the outset to reduce the need for discussions on every single watercourse crossing along the scheme length. This work should also take cognisance of the above Strategic Flood Risk Assessment work in terms of the levels of assessment required for different crossings.	Justification for the crossing types is provided in Appendix A9.5 (Watercourse Crossings).
	2.3 To assist in meeting CAR requirements, refer/adhere to guidance available on our website. WAT-SG-25 Good Practice Guide – River Crossings details the types of crossing available in order of increasing environmental impact. SEPA's preferred option is for bridges or bottomless/arched culverts to minimise environmental impact wherever possible. Where pipe or boxed culverts are used these should be at least the same width as the natural active channel, with the base buried to allow a naturalised bed. Other options which would have greater environmental impact, will need to be justified within the Environmental Statement.	A reference to WAT-SG-25 Good Practice Guide – River Crossings is included in Chapter 9, paragraph 9.5.25 and justification for the crossing types is provided in Appendix A9.5 (Watercourse Crossings).
	2.4 A site survey of existing water features and crossings and a map of the location of all proposed engineering activities in the water environment should be included in the Environmental Statement. A systematic table detailing the justification for the activity and how any adverse impact will be mitigated should also be included. The table should be accompanied by a photograph of each affected water body along with its dimensions.	All engineering activities within the water environment are shown on Figures 9.1 and 9.3. Photographs of affected waterbodies and justifications for these activities are noted in Appendix A9.5 (Watercourse Crossings). Mitigation is recorded in Chapter 9 (Road Drainage and the Water Environment).
	2.5 Any surveys should take cognisance of the local area River Basin Management Plan which details measures proposed to improve the status of water bodies in line with the requirements of the Water Framework Directive. We hold data on the current status of water bodies with a catchment of 3 square km or greater and this can be acquired via our Science.Advice@sepa.org.uk mailbox.	River Basin Management Plan (RBMP) has been referenced within Chapter 9.
	2.6 For large watercourse crossings or watercourse diversions a hydrogeomorphological assessment may be required to assess scour or erosion impacts. This will also need to detail how the proposals will mitigate impacts upon the watercourse. Please refer to the above guidance for when this may be required.	Scour and erosion impacts assessed in Chapter 9.
	<p>2.7 We visited the watercourse crossings shown in the submitted plans and noted the below. Please note that the above crossing designs will need to take into account flood risk as detailed in Section 1 above.</p> <p>a) Shochie Burn at Luncarty – This appears to be a twin bottomless arch culvert with a good gravel bed and flow through each half. We would therefore require as a minimum, an extension of the bottom less arch culvert.</p> <p>b) Ordie Burn at Luncarty - Again this appears to be another twin bottomless arch culvert this time with flow only through one culvert with good gravel bed and looks like second one only comes into use in high flows. Again we would require no less than is what is there already i.e. a bottomless arch culvert and flow limited to one culvert barrel during low flows.</p>	Watercourse proposals have been identified in Appendix A9.5 (Watercourse Crossings).and SEPA's comments considered in the development of the proposed scheme design.

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SEPA <i>continued</i>	<p>c) Ordie Burn at Newmiln - The plans in Figure 4 indicate the 'Ordie Burn Culvert'. This is actually a bridge (not a culvert) with a small amount of banking affected by the bridge. It may be that this will not be affected as it is just off Stanley compact junction but we thought it was worth highlighting just in case. If there is to be any work done here then again we would require bridge to be improved/expanded in that a bridge with no bed affected and minimal use of banking to effect a crossing.</p> <p>d) Ardonnachie Burn, Bankfoot - This is a small watercourse with an existing pipe culvert. This is already culverted for more than just A9 crossing however any extension of the culvert may be acceptable provided a slightly larger box culvert with buried base is utilised.</p> <p>e) Gelly Burn, Waterloo - This was a very small watercourse with a pipe culvert crossing which may have limited flow in dry summer conditions and therefore an extension of existing pipe culvert may be acceptable here.</p> <p>f) Broomhill Burn, Waterloo - This was a very small watercourse with a pipe culvert crossing which may have limited flow in dry summer conditions and therefore an extension of existing pipe culvert may be acceptable here.</p>	
	2.8 Where developments cover a large area, there will usually be opportunities to incorporate improvements in the water environment required by the Water Framework Directive within and/or immediately adjacent to the site either as part of mitigation measures for proposed works or as compensation for environmental impact. The River Basin Management Plan sets out proposals to improve watercourses and the proposed development should take cognisance of these proposals.	The RBMP has been considered within Chapter 9, paragraph 9.2.4 and Section 9.3 (baseline). The mitigation for all watercourses is recorded in Section 9.5.
	2.9 We encourage applicants to seek such opportunities to avoid or offset environmental impacts. Improvements which might be considered could include the removal of redundant structures, the creation of buffer strips and provision of fencing along watercourses. Fencing off watercourses and creating buffer strips both helps reduce the risk of diffuse water pollution and affords protection to the riparian habitat. We also note that the existing carriageway may require significant upgrading including the replacement of some crossings. Where this is the case the opportunities to improve the crossings should be considered. For example changing from a box culvert to a bottomless culvert.	Refer to proposals for Shochie and Ordie Burn culverts included in Appendix A9.5 (Watercourse Crossings).
	2.10 Please note that while we are aware of the budgetary constraints associated with this type of development, you should be aware that we view the most cost-effective solution as the one that minimises environmental harm or maximises environmental benefit at a proportionate cost. In itself, a large absolute cost does not constitute disproportionate cost. For example, incurring significant costs to prevent significant environmental harm or achieve significant environmental gain would be considered proportionate. But incurring significant cost for minor environmental gain would be considered disproportionate and therefore not cost-effective	Consideration given Appendix A9.5 (Watercourse Crossings).
	2.11 Further guidance on the design and implementation of crossings can be found in our Construction of River Crossings Good Practice Guide. Other best practice guidance is also available within the water engineering and regulation sections of our website.	Construction of River Crossings Good Practice Guide is referred to in Chapter 9, paragraph 9.5.23.
	2.12 Please also refer to WAT-RM-02: Regulation of Engineering Activities which sets out in detail the process for determining an engineering authorisation under The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR).	CAR Regulations referred to in Chapter 9, paragraphs 9.2.5.
	2.13 We also recommend that you discuss your proposals with the relevant Fisheries Board or Trust as they will have important information relating to the best timing of works, the presence of different species and any existing fish barriers or problem areas which could be addressed as part of the works. If they do not hold the required information then survey work will be required.	Consultation has been undertaken with the Tay District Salmon Fisheries Board, as summarised in the ES and in this table.

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SEPA <i>continued</i>	2.14 In terms of the best way to approach the CAR application process you can submit one single application for the whole road section or individual applications for each crossing, dependant on the levels of authorisation dictated in the Practical Guide to the Water Environment. The disadvantage of one single application would be that should a single element prove to be problematic this would hold up the determination of the other elements as it all falls under one licence.	Noted.
	3. Surface water drainage 3.1 We welcome the proposal to implement two levels of sustainable drainage systems for the road (SUDS). This requirement would also apply to any construction compounds, temporary areas of hardstanding or temporary roads required to enable the continuity of the A9 during construction.	SUDS has been considered and referenced within Chapter 9 and shown in Figure 9.3.
	3.2 For the avoidance of doubt, the treatment of surface water runoff by sustainable drainage systems (SUDS) is a legal requirement for most forms of development. We encourage surface water runoff from all developments to be treated by SUDS in line with Scottish Planning Policy (Paragraph 209), PAN 61 Planning and Sustainable Urban Drainage Systems and PAN 79 Water and Drainage.	Taken into account in the assessment reported in Chapter 9.
	3.3 It is important to ensure that adequate space to accommodate SUDS is incorporated within the site layout. This should include both construction and operational SUDS should they be separate systems. Consideration should be given to this matter early in the planning process when proposals are at their most fluid and modifications to layout can be easily made with less expense to the developer. Each individual type of SUDS facility, such as a filter drain, detention basin, permeable paving or swale, provides one level of surface water treatment. The SUDS treatment train should be followed which uses a logical sequence of SUDS facilities in series allowing run-off to pass through several different SUDS before reaching the receiving waterbody. SUDS devices should not be located on any existing wetland areas as identified through the Phase 1 habitat survey detailed below.	SUDS strategies are described in Section 9.5 of Chapter 9.
	3.4 SEPA expect a minimum of two levels of treatment however where a section of road is close to a designated site it may require additional levels of treatment to be agreed with Scottish Natural Heritage and may be determined by the available dilution of the receiving waterbody.	Levels of treatment are referred to in paragraph 9.5.39 of Chapter 9. Consultation with SNH and Perth & Kinross Council on drainage proposals undertaken during the EIA process.
	3.5 Whilst this may only be an issue during construction, please note that run-off from areas subject to particularly high pollution risk (eg yard areas, service bays, fuelling areas, pressure washing areas, oil or chemical storage, handling and delivery areas) should be minimised and directed to the foul sewer, if possible. Where run-off from high risk areas cannot be directed to the foul sewer we can, on request, provide further site specific advice on what would be the best environmental solution.	Run off areas at risk to pollution risk are covered in best practice mitigation in Section 9.5.
	3.6 Further guidance on the design of SUDS systems and appropriate levels of treatment can be found in CIRIA's C697 manual entitled The SUDS Manual. Advice can also be found in the SEPA Guidance Note Planning advice on sustainable drainage systems (SUDS) and the SUDS section of our For technical guidance on SUDS techniques and treatment for roads please refer to the SUDS for Roads manual.	SUDS Manual is referenced in Chapter 9, particularly in reference to mitigation in Section 9.5.
	3.7 SUDS must be used on all aspects of the development, including any areas with elevated levels of contaminants. SUDS which use infiltration will not be suitable where infiltration is through land containing contaminants which are likely to be mobilised into surface water or groundwater. This can be overcome by restricting infiltration to areas which are not affected by contamination, or constructing SUDS with an impermeable base layer to separate the surface water drainage system from the contaminated area.	Infiltration is discussed in paragraph 9.5.42, and covered by Mitigation Item G2 of Chapter 8..

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SEPA <i>continued</i>	3.8 We note your query regarding the using of filter drains with a permeable liner. Provided that all surface water is still subject to two levels of treatment and groundwater is at least 1m below the level of the discharge point then we would not object to this being used. Please note groundwater should be measured to seasonally highest water table in winter.	Noted and referred to in Chapter 9.
	3.9 We note that you are keen to develop a standardised approach to SUDS for the whole scheme so this first road section may set some guiding principles. We recommend that you develop a standardised approach which sets out different SUDS devices available and flags up sensitivities, such as designated sites, which may require extra levels of treatment. We would welcome the opportunity to comment on any draft guiding principles.	Noted.
	3.10 Please note we will not provide comments on the quantity aspects of SUDS. Comments should be sought from the local authority roads department and the local authority flood prevention unit on the acceptability of post-development runoff rates for flood control. Peter Dickson (pdickson@pkc.gov.uk) may be a good first contact to ascertain any requirements from the Council. As discussed at our recent meeting you may wish to seek comments from him on the existing issues where surface water run-off from Westwood Farm sometimes flows across the A9 and also near Bankfoot, the problem with existing groundwater seepage or possible severance of a drain or watercourse which could create SUDS capacity issues should the road be extended. Please note our comments in Section 1.8 above.	Noted.
	3.11 Again in terms of the best way to approach the CAR application process you can submit one single application for the whole road section or individual applications for each SUDS discharge dependant on the levels of authorisation dictated in the Practical Guide to the Water Environment. The disadvantage of one single application would be that should a single element prove to be problematic this would hold up the determination of the other elements as it all falls under one licence.	Noted.
	4. Existing Groundwater Abstractions <ul style="list-style-type: none"> • A list of groundwater abstractions both within and outwith the site boundary needs to be drawn up and a risk assessment of possible impacts undertaken. SEPA guidance can assist with establishing the radius of the risk assessment. • Advised that information on private water supplies usually relates to the point of use (i.e. the household). The risk assessment should be undertaken at the point of abstraction which may require a site visit and contact with the supply owner. 	Chapter 8 identifies groundwater abstractions based on Envirocheck information and consultation with land owners (as reported in Section 8.1 of Chapter 9, with principles described in Section 8.2 (i.e. risk assessment undertaken at the point of abstraction)).
	5. Contaminated land <p>5.1 We also note that ground investigations may be undertaken where the risks of contaminated made ground are considered highest in order to apply appropriated remediation and mitigation measures. Any development works in the subsurface where contaminants exist may remobilise contaminants allowing them to migrate to the groundwater resource. In addition changes to groundwater flow can divert pollution towards receptors previously not at risk.</p> <p>5.2 Where contaminated land is identified the Environmental Health department should be consulted in order to ensure that a ground investigation and subsequent remediation (where necessary) is carried out in order to ensure minimal risk to the groundwater environment. Any development works in the subsurface where contaminants exist may remobilise contaminants allowing them to migrate to the groundwater resource.</p>	Potential contaminated land sites have been identified and assessed following industry standards.
	6. Dewatering <ul style="list-style-type: none"> • All sensitive receptors should be identified and appropriately assessed in the event that any temporary or permanent groundwater abstractions or dewatering is required. Details should be provided of how any dewatering will be managed along with the proposed abstraction volumes and measures that will be taken to minimise any risks to identified receptors. 	The volumes of water to be extracted constitute the Threshold for exemption or different types of licensing, and on that basis, this information is typically relevant for the compilation of CAR processes.

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<p>SEPA <i>continued</i></p>	<ul style="list-style-type: none"> • SEPA have noted that Jacobs have historic groundwater investigation data but that we are unable to update this until after the Environmental Statement is submitted due to timing constraints. The Environmental Statement should demonstrate what the seasonally highest water table is and what appropriate mitigation is achievable within the development footprint. • Where it is considered that dewatering is likely to be required, the Environmental Statement should contain the following information to determine how the dewatering will be managed: <ul style="list-style-type: none"> ➢ Source; ➢ Location; ➢ Volume; ➢ Timing; ➢ Nature of abstraction; ➢ Proposed operating regime; ➢ Survey of existing water environment including any existing water features; ➢ Impacts of the proposed abstraction upon the surrounding water environment. • If other development projects are present or proposed within the same water catchment then we advise that you consider whether the cumulative impact upon the water environment needs to be assessed. The Environmental Statement should also contain a justification for the approach taken. 	<p>The chapter includes a screening of road cuttings, which discusses the likelihood of intercepting groundwater. The significance of impact is assessed qualitatively and is discussed separately for each type of receptor. A quantitative assessment cannot be provided at this stage as it will depend on the detailed design and the appointed Contractor.</p> <p>The mitigation reported in Chapter 8 states that “Where proposed road cutting widening is likely to intercept groundwater, as per Table 8.13, the Contractor will consider potential volumes of groundwater intercepted within the groundwater abstraction CAR context prior to starting the works. To support such assessment, additional GI may be required.”</p> <p>In parallel to the EIA, additional assessments were undertaken to estimate volumes, with the current GI data. Where the volume estimates fall under potential CAR licencing, a technical report is prepared. However, this level of detail is not included within the ES.</p> <p>CAR applications are in preparation alongside the ES.</p> <p>In summary, the ES provides a qualitative assessment and the parallel CAR application process will provide the quantitative assessment requested by SEPA.</p>
	<p>7. Disruption to Wetlands including Peatlands</p> <p>7.1 A Phase 1 Habitat Survey should be carried out for some sections of the development area. Guidance is provided on the SEPA website to help with the identification of wetland areas.</p> <p>7.2 National Vegetation Classification should be completed for any wetlands identified. Results of these findings should be submitted, including a map with all the proposed infrastructure overlain on the vegetation maps to clearly show which areas will be impacted and avoided.</p> <p>7.3 SEPA has noted that the Scoping Report does not refer to groundwater dependent terrestrial ecosystems. SEPA believe these to be important receptors depending on site conditions and that they may be overlooked if the assessment is undertaken on surface water impacts only.</p>	<p><i>Please see text on following page of table</i></p>

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<p>SEPA <i>continued</i></p>	<p>7.4 In order to determine which areas will require a Phase 1 Habitat Survey, SEPA advise the use of Land Cover Map 2007/LCM2010 to identify areas of disturbed ground. Where land is identified as urbanised, arable agriculture or commercial forestry, these areas can be excluded from the Phase 1 survey areas. Railway embankments can also be excluded from the survey zone.</p> <p>7.5 Where linear infrastructure (e.g. railway line) is present alongside the existing A9, the area in-between will potentially require to be surveyed depending on is illustrated on the Land Use cover maps. Areas beyond the linear infrastructure would not need to be surveyed as it acts as a buffer. The same applies for other development such as housing.</p> <p>7.6 All other areas within 100m either side of the road will require a Phase 1 survey, and followed with a National Vegetation Classification where wetlands are identified. The Scottish Wetland Inventory (which has been provided to Transport Scotland) can be used to inform areas which are currently lacking survey information.</p> <p>7.7 Details of how impacts upon wetlands including peatlands are minimised and mitigated should be provided within the ES.</p> <p>7.8 Should include preventative/mitigation measures to avoid significant drying or oxidation of peat through the construction of access tracks, dewatering, excavations, drainage channels, cable trenches, or the storage and re-use of excavated peat.</p> <p>7.9 Mitigation proposals should also be detailed within the Construction Environmental Management Document. In addition, existing areas of wetland should not be used for treatment of contaminated surface waters and run-off both during and post construction.</p>	<p>Chapter 8, Sections 8.3 and 8.4 discuss Groundwater Dependent Terrestrial Ecosystems (GWDTE). These receptors have been identified based on their designations, and information provided by the ecology team.</p> <p>A Phase 1 habitat survey was undertaken for the entire study area and is provided as Figure 10.2a-d, NVC surveys were also undertaken, where appropriate as explained in Chapter 10 (Ecology).</p> <p>The proposed scheme has no significant impact on peat deposits (see additional responses in relation to SEPA point 8, as covered below).</p>
	<p>8. Disturbance and re-use of excavated peat or soils</p> <p>8.1 It seems unlikely that this section of the scheme will impact upon peatlands but it may involve the significant movement of soils. There are important waste management implications of measures to deal with surplus soils under The Waste Management Licensing (Scotland) Regulations 2011. A soils balance should be included within the Environmental Statement to demonstrate how excavated soils will be re-used on site and how any surplus soils will be dealt with. Appendix 1 contains an example table which could also provide a useful basis for setting out this information however we appreciate you may already have agreed methods for setting out this information.</p> <p>8.2 Where material is to be exported off site this should be via a registered waste carrier and to an appropriately licensed or exempt site. We would also highlight that our "end of waste" position for recovered asphalt which is contained within our Guidance on production of fully recovered asphalt road planings.</p> <p>8.3 Through the above Phase 1 habitat survey it should be apparent if any peat is present. If peat is indeed present then please refer to Appendix 1 of this letter which contains detailed advice on the information we would expect to be included within the Environmental Statement.</p> <p>8.4 You may also need to import materials. It should be ensured that the relevant waste management exemptions under The Waste Management Licensing (Scotland) Regulations 2011 are in place for the re-use of certain materials, further information is available on the our website. Guidance on the reuse of greenfield soils can be found with in our guidance entitled Promoting the sustainable reuse of greenfield soils in construction.</p>	<p>Chapter 8 cross references Chapter 17 (Materials) for cut/fill balance calculations. The re-use of potentially contaminated land soil is, however, noted in Chapter 8 with appropriate mitigation measures identified in Section 8.5. Where re-use is not applicable, reference is made to off-site disposal.</p> <p>The proposed scheme has no significant impact on peat deposits. Guidance in Appendix 1 (peat management) is applicable to areas where significant areas of peat deposits are potentially affected. This is not the case for the proposed scheme which is located alongside small isolated areas of peat. The guidance asks for a detailed map of peat depths, and following discussions with SEPA on the draft ES, Figure 8.1 of the ES shows the location of peat deposits, while peat depth and anticipated volumes (catotelmic and acrotelmic) are provided within Chapter 8.</p>

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SEPA <i>continued</i>	<p>9. Pollution prevention and environmental management</p> <p>9.1 One of our key interests in relation to major developments is pollution prevention measures during the periods of construction (including cuttings, removal of forestry and temporary works), operation, maintenance, demolition and restoration. The construction phase includes construction of ancillary works, temporary roads any other site infrastructure.</p>	Pollution prevention measures during the construction phase are reported in Section 9.5 of Chapter 9.
	<p>9.2 We advise that you should, through the Environmental Impact Assessment process, systematically identify all aspects of site work that might impact upon the environment, potential pollution risks associated with the proposals and identify the principles of preventative measures and mitigation. This will establish a robust environmental management process for the development.</p>	Effects of all aspects of site work are discussed in Sections 9.4 and 9.5 of Chapter 9. Residual impacts are noted in Appendix A9.4.
	<p>9.3 A draft Schedule of Mitigation and draft Environmental Management Plan should be included within the Environmental Statement. This should cover all the environmental sensitivities, pollution prevention and mitigation measures identified to avoid or minimise environmental effects. Details of the specific issues that we expect to be addressed are available on the Pollution Prevention and Environmental Management section of our website.</p>	A schedule of mitigation, which includes a measure for the contractor to draft Environmental Management Plans is included in Chapter 20 (Schedule of Environmental Commitments).
	<p>9.4 We also note that the existing carriageway will be upgraded and may involve the generation of significant quantities of waste materials. Details of how this will be managed should be included within the Environmental Statement.</p>	Chapter 17 (Materials) provides estimates of material to be generated by the proposed scheme and details of how it will be managed.
	<p>9.5 We note that you are keen to develop a standardised approach Environmental Management Plan for the whole scheme so this first road section may set some guiding principles. It would also provide a useful link between the principles of development which need to be outlined at the early stages of the project and the method statements which are usually produced following award of contract (just before development commences).</p> <ul style="list-style-type: none"> • Best practice advice developed by The Highland Council (in conjunction with industry and other key agencies) on the Construction Environmental Management Process is available in the guidance note Construction Environmental Management Process for Large Scale Projects 	Noted.
	<p>10. Borrow pits</p> <p>10.1 It is unclear whether any borrow pits are proposed as part of this proposal. Detailed investigations in relation to the need for and impact of such facilities should be contained in the ES. Where borrow pits are proposed, information should be provided regarding their location, size and nature. In particular, details of the proposed depth of the excavation compared to the actual topography and water table should be submitted. In addition details of the proposed restoration profile, proposed drainage and settlement traps, turf and overburden removal and storage for reinstatement should be submitted.</p> <p>10.2 The impact of such facilities (including dust, blasting and impact on water) should be appraised as part of the overall impact of the scheme. Information should cover, in relation to water; at least the information set out in Planning Advice Note PAN 50 Controlling the Environmental Effects of Surface Mineral Workings (Paragraph 53). In relation to groundwater, information (Paragraph 52 of PAN 50) only needs to be provided where there is an abstraction or groundwater dependent terrestrial ecosystem within 250 m of the borrow pit. Additional information on groundwater is provided above.</p>	No borrow pits have been proposed for the proposed scheme.
	<p>11. Air Quality</p> <p>SEPA recommend that Environmental Health Department within the relevant local authority is consulted early in the process for issues relating to local air quality management.</p>	<p>Perth & Kinross Council was consulted early in the process for issues relating to local air quality management.</p> <p>Details of local air quality management are reported in Chapter 14 (Air Quality).</p>

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<p>Scottish Natural Heritage (SNH) EIA Consultation Response 16 April 2013</p>	<p>Ecology and Nature Conservation</p> <ul style="list-style-type: none"> • Advised to source data for protected species, River Tay SAC, historical INNS records, wildcat and otter from Halcrow. • SNH have records for freshwater pearl mussel, badger, red squirrel and some INNS records. These records are currently on their internal systems and SNH intend to get their GIS team to make this information available externally and cut down on individual requests from consultants. • SNH to make comments on the HRA for the River Tay SAC via a separate consultation exercise. • Mill Dam SSSI and Craig Tronach SSSI to be removed from consideration in this section of the A9 dualling and should be addressed in the Birnam to Tay bridge crossing work, if required, where they may be more relevant. • SNH believe the scope of protected species and habitat survey work proposed is comprehensive. <p>Landscape and Visual Impact Assessment</p> <ul style="list-style-type: none"> • SNH want the the overall Landscape Design Principles, being established for the entire route, included in subsequent stages of the EIA so they are incorporated in the design of the two sections that precede the dualling of the entire route. <p>Effects on All Travellers</p> <ul style="list-style-type: none"> • In relation to proposed mitigation plans for non motorised access (pedestrians, cyclists and equestrians) the broad Access Design Principles, being established for the entire route, need to be included in subsequent stages of the EIA. 	<ul style="list-style-type: none"> • GIS data for protected species, River Tay SAC etc. was obtained and used to inform the assessment reported in Chapter 10: Ecology and Nature Conservation. • A separate consultation process for the HRA has been undertaken and SNH have provided comments on the draft HRA, which have been addressed in Chapter 10: Ecology and Nature Conservation. • Overall design principles and outcomes of the SEA have been considered in the ES and are noted in the relevant chapters. Detailed consultation with SNH to specifically consider the issues and risks around SUDS, to provide strategic design guidance on the levels of treatment required before discharge to SAC designated areas, and to agree guidance on SUDS in the flood zone.
<p>SNH (Deer Commission Scotland) EIA Consultation Response 19 April 2013</p>	<ul style="list-style-type: none"> • The deer commission has now merged with SNH. • SNH has supplied deer vehicle collision data to Transport Scotland for the purpose of understanding where specific issues are currently and to aid the design of appropriate mitigation measures when designing the new dual carriageway. SNH has offered to send Jacobs the data. • SNH stated there may be opportunities to design in green bridges and other features to reduce the incidence of deer vehicle collisions on this stretch of the A9, and would welcome the opportunity to contribute to the design. 	<ul style="list-style-type: none"> • Deer vehicle collision data were received from SNH whilst undertaking the assessments within Chapter 10 (Ecology and Nature Conservation). This species group was scoped out from having a conservation value. However, the receptor was included in the ecological assessment due to the potential for collisions with vehicles during the operational phase of the proposed scheme, resulting in the potential for road safety issues. Mitigation is covered in Chapter 11 (Landscape).
<p>Tay District Salmon Fisheries Board (TDSFB)</p>	<ul style="list-style-type: none"> • Main concern is the area surrounding the Shochie Burn and its tributaries, the Ordie Burn and Garry Burn. • This tributary system is a productive one for salmon spawning and also for sea trout. • TDSFB have electrofishing data for a number of sites in these tributaries (e.g. annual data for a site on the Shochie Burn and one on the Ordie Burn for a number of years, but these sites are well upstream of the A9). • TDSFB also have occasional electrofishing data for recent years from another site on the Shochie Burn and Ordie Burn, with some data from mid 2000s for the Garry Burn. Data shows good numbers of juvenile salmon particularly, but all the sites are upstream of the A9. • Two years ago TDSFB installed a resistivity fish counter in a weir on the lower Shochie Burn at Luncarty. TDSFB can count adult salmon (but potentially also large sea trout as these are not discriminated) going upstream. TDSFB now have two years of data on this. Data is particularly useful in showing when and under what conditions adult salmon enter this tributary. • No data on other species, although lampreys and invasive species have been caught in the Ordie Burn. Beavers are now present at the Battleby Loch on the lower Shochie Burn. 	<ul style="list-style-type: none"> • No data were received to inform survey work undertaken. Existing Tay District Salmon Fisheries Board reports and information received has been included in the baseline considered in the assessment. Refer to Chapter 10 (Ecology and Nature Conservation) and Appendix A10.3.

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Non-Statutory Consultees		
Bat Conservation Trust (BCT)	<ul style="list-style-type: none"> Recommended to contact Dr Sue Swift (of Tayside bat group) for information as well. BCT noted that the habitat, woodland and water make for a good feeding habitat. BCT believe bats will be present in the area. BCT noted the potential for the works to impact on bat roosts, bat feeding areas and bat commuting routes BCT noted the potential for bats to roost in a variety of places such as trees, rock faces, bridges and buildings. Any of these features that will be affected by the works should be checked for bats / bat roost potential. If roosts are found then a licence is needed before these can be damaged, obstructed or destroyed. Bats and lighting - if the road is to be lit then avoid light spill and try to maintain dark corridors for feeding / commuting bats. 	<ul style="list-style-type: none"> No data were received to inform survey work undertaken. Information given has been used to inform the baseline considered in the assessment. Refer to Chapter 10 (Ecology and Nature Conservation) and Appendix A10.3.
British Geological Survey	<ul style="list-style-type: none"> BGS not likely to have any information of relevance to the EIA. No Geological Conservation Review sites exist within the area in question, nor are the BGS aware of any geodiversity sites within the area. In May 2013, the BGS is to undertake a new geological survey in the area around Crieff, including the Luncarty to Ballinluig section of the A9. May reveal new information that will be of relevance to the A9 upgrade project. 	<ul style="list-style-type: none"> Comments taken into account in Chapter 8 (Geology, Contaminated Land and Groundwater).
British Horse Society (BHS)	<ul style="list-style-type: none"> Note presence of a crossing at Coltrennie, but also the absence of a crossing at Gellywood. Consider the Gellywood a major crossing point. BHS querying how walkers / riders cross the A9 under these arrangements. Note the presence of a grade separated junction at Stanley / Tullibelton which allow horses on the old A9 and at Tullibelton and near Little Glenshee to cross ok. 	<ul style="list-style-type: none"> The proposed scheme design provides a crossing point at Gelly Wood Jacobs met with BHS representatives in October 2013 to discuss the proposed scheme design, confirming the crossing points to be provided (refer to Chapter 16: Effects on All Travellers). BHS requested that high parapets are provided at Tullybelton Overbridge. The proposed scheme design accommodates this, providing 1.8m high infilled panels.
ByCycle	<p>Working north from Luncarty:</p> <ul style="list-style-type: none"> Overpass to Northleys/Cramflat etc from B9099. From a ByCycle perspective the loss of direct access to the A9 does not present a problem. ByCycle state that the ability to cross on the overpass may encourage greater use of the core path network (LUNC/122, LUNC/125 and LUNC/123) by all non-vehicle users, not just cyclists. Newmill Junction Complex. Provided there are dedicated cycle/pedestrian paths provided for all the routes at this junction, including the flyover and sliproads, ByCycle foresee no problems. As stated above, ByCycle believe it can only be of benefit to pedestrians and cyclists to be able to cross the A9 east/west without being on the main carriageway as is the case at present. ByCycle note the absence of an extension of this section of the old A9 from Bankfoot (core path AGVN/115) to link into the Newmill complex (figure 3). ByCycle believe such an extension is vital to give pedestrian/cyclist access from Bankfoot to Stanley and Luncarty, and also to the recreational area of Five Mile Wood where the recently established Stanley Community/Forestry Commission mountain bike track can be better exploited by those residents living west of the A9. The present omission of this link forces cyclists between Bankfoot and Newmill onto the main carriageway of the A9. ByCycle consider this omission highly unsatisfactory. 	<ul style="list-style-type: none"> Proposed scheme design significantly improves access, safety and linkages for all NMUs including cyclists. A safe route between Luncarty and Bankfoot has been included in the design through the provision of footway/cycleways linking to the wider path network. Further details are provided in Chapter 16: Effects on All Travellers

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ByCycle <i>continued</i>	<ul style="list-style-type: none"> • Bankfoot. ByCycle agree with arrangements for Bankfoot. Would be pleased to see a cycle lane on the road through the underpass from the village to the road to South Barns, and to the A9's southbound access/egress. • Gelly. ByCycle interested to know how the scheme plans to maintain the linkage of core paths AGVN/113 to SPIT/101. Currently the link involves crossing the main carriageway. Believe it is not clear from Figure 6 if there is to be an underpass linking these paths. ByCyle stated there appears to be no access/egress for the inhabited house at Gelly, on • the south side of Gelly Woods - their current access is along the track AGVN/113. • A9 Carriageway. Feel it is important for there to be cycle lanes along the linear route of the A9 itself: "There is evidence that many road/touring/commuter cyclists do currently use the A9, and with the rise in interest in cycling for both recreational and touring purposes, the numbers of cyclists using the route is likely to increase. Dualling of the A9 is such a major project that it would seem most important that the needs of all road users, including recreational/ touring/ commuting cyclists, are addressed and their requirements taken into account, both for now and future years. 	<i>Please see text on previous page of table</i>
CTC	<p>CTC stated that emphasis should be on serving local community needs. Key points CTC raised, comprise:</p> <ul style="list-style-type: none"> • Requirement for higher standard of design and construction of cycle tracks. This was noted as a significant issue further north where harsh winter conditions can lead to track surfaces degrading through frost. • CTC raised that the standard of management of cycle tracks using pre-existing routes (often abandoned sections of the former carriageway) should be improved and the responsibilities associated with this should be clearly stated. • CTC note a question of safety regarding 'side-of-carriageway' cycle routes. Adequate separation is encouraged to improve safety. • CTC asked for existing crossings to be taken into regard in our assessments. • CTC stated that trunk roads could sever communities from the countryside on the other side of the carriageway. They note that, in reality, there is often little opportunity to resolve such issues. CTC note that those intent on exercising their statutory rights may do so simply by crossing the carriageway at grade. • CTC request that due consideration is given to junctions of cycle paths to ensure they are safe and suitable for cyclist use. • CTC identified a possible opportunity of near-carriageway cycle paths from the Redgorton junction north as far as the Tullybelton junction to provide Stanley and Luncarty villages with more realistic cycle commuting distances into Perth. 	Comments taken into account in Chapter 16: Effects on All Travellers.
First Group	<ul style="list-style-type: none"> • No response. 	n/a
Forestry Commission Scotland (Perth and Argyll)	<ul style="list-style-type: none"> • The section immediately north of Luncarty is unlikely to have significant impacts on woodland. • Recognise the presence of individual old and veteran trees present in hedgerows and field margins. These are noted for their high nature conservation and landscape value. • The A9 passes through a group of woodlands marked as Gelly wood. These woodlands are recorded on the Ancient Woodland Inventory and should be regarded as having high conservation status. • For both above two items, recommended to view paragraph 147 Consolidated Scottish Planning Policy 2010. • Any woodland removal should be considered against the Scottish Governments Policy on Control of Woodland Removal. This indicates that any woodland loss required to deliver this project would require an associated area of compensatory planting to be carried out. The location, extent and type of this compensatory planting should be agreed with input from Forestry Commission Scotland. These new proposed areas of planting will themselves be subject to consideration under the EIA Forestry regulations. 	<ul style="list-style-type: none"> • All comments taken into consideration as part of landscape and ecology assessments; refer to Chapters 10-12. Impacts on commercial woodlands are also considered in Chapter 7 (Community and Private Assets).
National Trust	<ul style="list-style-type: none"> • No response. 	n/a

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Network Rail	<ul style="list-style-type: none"> No response. 	n/a
Perth Museum Biological Records Centre	<ul style="list-style-type: none"> No response. 	n/a
Ramblers Association	<ul style="list-style-type: none"> Sought confirmation that NMU access will be included in the EIA. JA's representations made to Scott Shaw of Transport Scotland on 04.05.12. 	<ul style="list-style-type: none"> Proposed scheme design significantly improves access, safety and linkages for NMUs. This includes specific provision of a safe route between Luncarty and Bankfoot by including footway/cycleways linking to the wider path network. Further details are provided in Chapter 16 (Effects on All Travellers) which includes the assessment on NMUs.
Royal Society for the Protection of Birds (RSPB)	<ul style="list-style-type: none"> Data on breeding birds within the survey area was provided. No formal comments at this stage. 	<ul style="list-style-type: none"> Data used to inform the assessment, refer to Chapter 10 (Ecology and Nature Conservation) and Appendix A10.3.
Scottish Mink Initiative	<ul style="list-style-type: none"> No response. 	n/a
Scottish Wildcat Assoc.	<ul style="list-style-type: none"> No response. 	n/a
SUSTRANS	<ul style="list-style-type: none"> GIS datasets provided for: <ul style="list-style-type: none"> NCN 7 (between Pitlochry and Inverness) ; NCN 77 (between Perth and Pitlochry); Local cycle routes in the vicinity of the A9 between Perth and Inverness; and Scottish Rights of Way (ScotWays) walking routes in the vicinity of the A9 between Perth and Inverness. SUSTRANS have reviewed the information and believe the NCN will be unaffected by the proposals. Recognise the potential for an increased number of vehicles using the quieter roads instead of the A9 during the construction process. Ideally, SUSTRANS would not want to see traffic increase on the quieter roads. Summary of response from the SUSTRANS Volunteer Rangers group, dated 31.03.13: Evidence that some cyclists continue to use the A9 in both sections, rather than Sustrans NCN Routes 7 and 77 and Regional Route 83, which avoid the A9 by taking a more circuitous route on minor roads together with some sections of purpose built cyclepath adjacent to the A9 carriageway. Currently few safe points for walkers, cyclists and horse riders to cross the A9. The dualling of the A9 gives the opportunity to improve this situation and new crossings should be provided, where possible. Currently no cycling provision alongside the A9 between Luncarty and the B687 at Birnam and the lack of safe crossing points on this section of the A9 is a significant physical obstacle to many of the possible routes that could be used for cycling as recreation or transport. 	<ul style="list-style-type: none"> GIS data set used to inform the assessment, refer to Chapter 16 (Effects on All Travellers). Proposed scheme design significantly improves access, safety and linkages for all NMUs including cyclists. A safe route between Luncarty and Bankfoot has been included in the design through the provision of footway/cycleways linking to the wider path network. Further details are provided in Chapter 16 (Effects on All Travellers).

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SUSTRANS <i>continued</i>	<ul style="list-style-type: none"> The proposals in the current consultation include a new junction for Stanley and Tullybelton, which is to be linked by a new section of road to Luncarty. This offers the opportunity for a new safe crossing point and the needs and safety of cyclists should be taken into account when designing this junction. There is also an opportunity to connect this junction to the remnants of the old A9 carriageway, which run from Grid Reference 083327 to Bankfoot and it is good to see that such a link is included within the proposals out for consultation. This will provide cyclists with an alternative more direct safe route to Bankfoot from the existing commuting route to Luncarty and is welcomed. The needs of cyclists should be incorporated in the design of both the new road link to Luncarty and the path connecting with the A9. Noted a new bridge over the A9 is indicated on the track through Murthly Estate (Muir of Thorn) at grid Reference 067376. This is welcomed and should incorporate the needs of cyclists and be provided with ramps. Opportunity to provide a new short section of cycle/footpath on the eastern side of the A9 carriageway linking the B867 and the northern entrance to Murthly Estate at Grid Reference 049398. This would provide safe access from Birnam for walkers and cyclists to the paths in the Estate. The needs of cyclists should be taken into account whichever option is decided for the new junction between the B867 and A9, and this could offer opportunity for safe direct access to Birnam for those travelling on Sustrans NCN Route 77. Existing link from the B867 to the Dunkeld and Birnam railway station should be maintained. The opportunity should also be taken to provide a new cycle path northwards from the station up to B898. Sustrans NCN Route 77 crosses the Tay using the west hard shoulder of the A9 river bridge and is then linked by a short section of path to the B898 to Dalguise and on the north side by a path dropping down from the A9 to the route of the old Wade road through the grounds of the Dunkeld House Hotel to Birnam. This route should be protected when renewing the A9/B898 junction and opportunity taken to improve river crossing for the cycle route when providing new bridge over the river. 	<i>Please see text on previous page of table</i>
Tayside Bat Group (formerly Perth Bat Group)	<ul style="list-style-type: none"> Tayside Bat Group have a number of bat records for the Luncarty to Birnam area - mainly near the river, but also some in Luncarty and Bankfoot. There is a large maternity colony of pipistrelles at Battleby, which could be affected due to their commuting routes along river. Recommended that any buildings affected by the proposed works should receive a full bat survey, as well as any mature trees (those with trunk diameter of >0.3m is my normal rule of thumb). Offered to send the bat records. 	<ul style="list-style-type: none"> No data were received to inform survey work undertaken. Information given has been used to inform the baseline considered in the assessment. Refer to Chapter 10 (Ecology and Nature Conservation) and Appendix A10.3.
Tayside Biodiversity Partnership	<ul style="list-style-type: none"> Anticipate opportunities to create otter and badger underpasses at several places. Want to work with local experts to ensure correct siting and engineering. Note a number of veteran trees on the route. Want to work with the planners to safeguard as many as possible. Note Tayside Geodiversity keen to be involved to highlight potential geodiversity sites (either newly created ones or to highlight existing ones). 	<ul style="list-style-type: none"> Data and information used to inform the assessment, refer to Chapter 10 (Ecology and Nature Conservation) and Appendix A10.3.
Tayside Geodiversity	<ul style="list-style-type: none"> Does not wish to preserve any rock sections on the Luncarty to Murthly Castle stretch of the A9. Anticipate any new cuttings will be in drift, mainly sand and gravel. There will probably be some interesting temporary sections exposed where the widened road or adjacent roads lie in a cutting (for example at Newmill). Hope it will be possible for one or two geologists to document these sections at a convenient stage during road construction. Believe the next section north through the Pass of Birnam to be of considerably more geological interest and would appreciate being kept informed. 	<ul style="list-style-type: none"> Comments taken into account in Chapter 8 (Geology, Contaminated Land and Groundwater).
Visit Scotland	<ul style="list-style-type: none"> No comments. 	n/a