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Environmental Impact Assessment Record of Determination

A9 Drumochter Dual Carriageway

Contents

Project Details

Description

BEAR Scotland has been commissioned by Transport Scotland to carry out signing works on the A9 Drumochter Dual carriageway to improve road safety. Works will consist of signage improvements to highlight the approach to the start and end of the dual carriageway, removal or relocation of existing signs, and cleaning of sign faces. In addition, minor concrete works will be required to install new signposts and some minor trimming of vegetation will be carried out to improve visibility of signage.

The scheme entails highly localised works within a 16.4km section of the A9 and is currently programmed to be completed within the 2023/2024 financial year. However, works may be delayed into the first half of the 2024/2025 financial year (April 2024 to October 2024 inclusive). Works are expected to be completed during daylight working hours and the expected duration of construction works will be approximately 20 days.

Traffic management (TM) is required to carry out works and is likely to entail lane closures with a 30mph speed limit. The TM strategy will be in line with recommendations and guidance in The Traffic Signs Manual Chapter 8.

Location

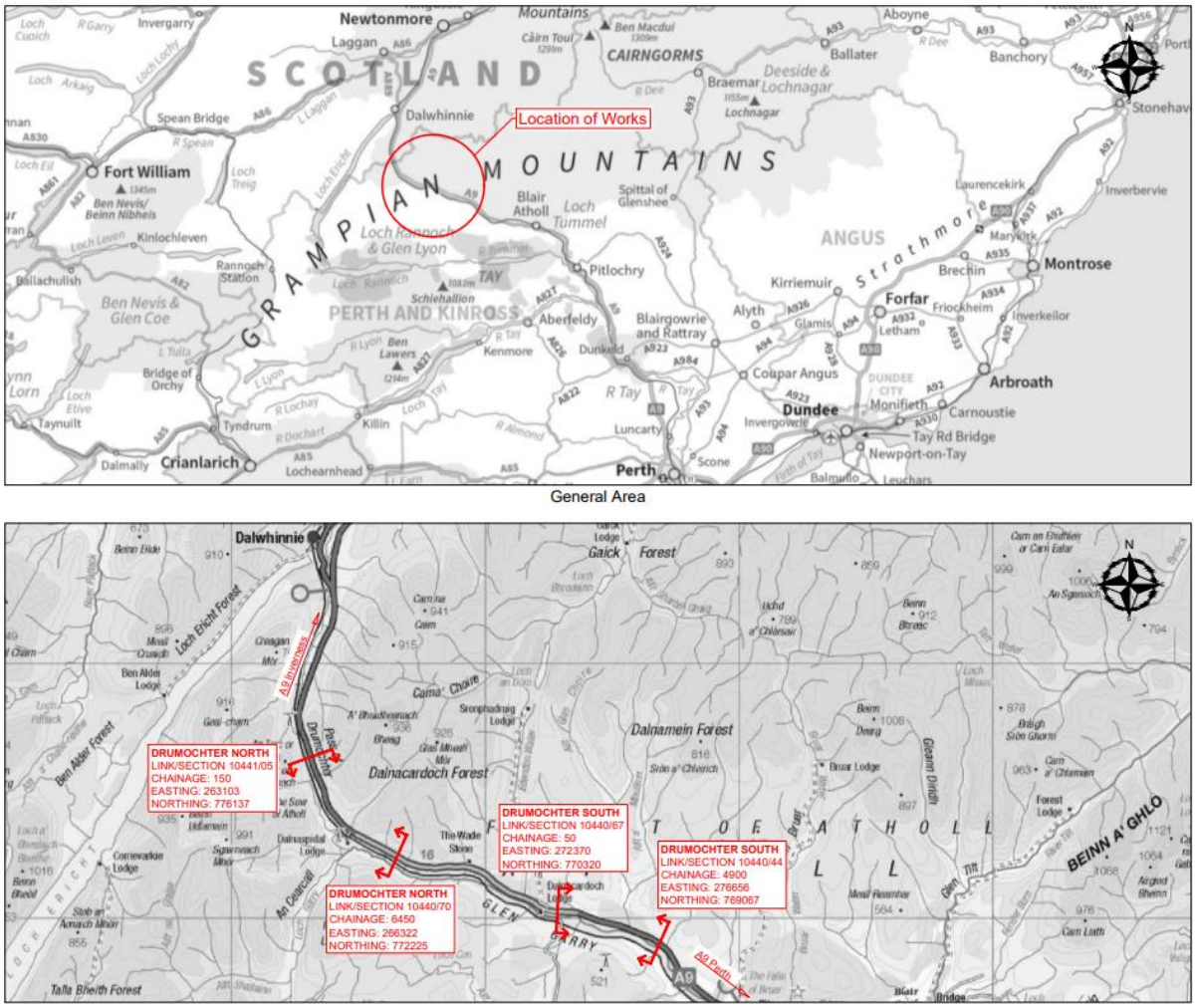
The works are to be located on the A9 carriageway from Drumochter pass (North section) and Glen Garry (South section) (Figure 1), located within the Highland Council area. The scheme has the following National Grid References:

North section:

- Scheme start: NN 63103 76137
- Scheme end: NN 66322 72225

South section:

- Scheme start: NN 72370 70320
- Scheme end: NN 76656 69087



General Area

Figure 1. Location of the proposed strategic road safety signage scheme at A9 Drumochter.

Source: BEAR Scotland. F108- Environmental Assessment Request (scheme reference: 23-NW-0801-63).

Description of local environment

Air quality

The scheme does not fall within any Air Quality Management Areas (AQMA) (Air Quality in Scotland).

There are no Air Monitoring Stations within 10km of the works (Site Data | Scottish Air Quality). The closest Air Monitoring Station is in Perth which is located over 50km south of the scheme itself.

No sites registered on the Scottish Pollution Release Inventory (SPRI) are located within 10km of the scheme (Map | Scotland's environment web).

Annual Average Daily Flow (AADF) at the nearest traffic monitoring point on the A9 was estimated at 9,996 total vehicles in 2022, 18.7% (1877) of which were heavy goods vehicles (HGVs) (Road traffic statistics).

Baseline air quality at the scheme location is primarily influenced by traffic along the A9 trunk road. Secondary sources could come from local forestry management and agricultural practices.

Cultural heritage

Using the online tool Pastmap, a desktop study identified the following cultural heritage features within 300m of the scheme extent:

- Four Listed Buildings within 300m of the southern scheme extent, including:
    - Dalnacardoch Lodge (LB6014), located approximately 30m south of the A9.
    - Dalnamein Bridge (Large) On Former Route of A9 (LB50911), located approximately 30m south of the A9.
    - Bridge Carrying Former Military Road Over Allt Anndeir, Including Milestone To Northeast Corner, Northeast of Dalnamein Lodge, Calvine (LB6011), located approximately 48m north of the A9.
    - Drochaid Dail An Faraoich, Bridge Carrying Former Military Road Over River Garry (LB6013), located approximately 170m south of the A9.
- Several undesignated assets recorded on the Historic Environment Record (HER) and Canmore databases. The nearest of these include:
    - Dalnamein Lodge, Allt Anndeir (ref MPK12664), a bridge on the A9 within the southern part of the scheme extent.
    - Dalnamein Lodge – Tigh Na Coille (ref MPK9301), which lies approximately 40m south of the A9 within the southern scheme extent.
    - Dalnamein Lodge (ref MPK16572), which lies approximately 50m south of the A9 within the southern scheme extent.

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

Landscape and visual effects

The scheme is not located within a National Scenic Area (NatureScot Sitelink). However, the scheme is entirely located within the Cairngorms National Park (Site code: 8623), which has the following Special General Qualities (Cairngorms National Park Authority):

- Magnificent mountains towering over moorland, forest, and strath.
- Vastness of space, scale, and height.
- Strong juxtaposition of contrasting landscapes.
- A landscape of layers, from inhabited strath to remote, uninhabited upland.
- 'The harmony of complicated curves.'
- Landscapes both cultural and natural.

The Landscape Character Type within the scheme is recorded as '126 Upland Glen – Cairngorms' (LCT 126) and holds the following key characteristics (Scottish Landscape Character Types):

- Strong evidence of glacial processes, including steepened sides and level floors, shattered rock faces on higher slopes, hummocks of resistant rock on some glen floors and terraces of glacial deposits at the edges of glen floors.
- Often form arrival points into the Cairngorms National Park.
- Size varies from large open passes to narrower, more secluded glens.
- Enclosed predominantly by steep slopes.
- Frequently differing land-use on one side of the glen to the other - linked to aspect.
- Improved, grazed fields on glen floors and floodplains.
- Mostly settled, some only sparsely, but often extensive evidence of past settlement, including prehistoric hut circles and associated field systems, pre-improvement townships, and seasonal shielings.
- Some landmark historic buildings.
- Access varies from narrow roads, estate and forestry tracks to main routes, but most have some form of road running through them.
- Varied experience when passing through glens from open and expansive to sheltered and secluded.
- Views to adjacent uplands; from which parts of the glens are visible and provide contrast.

Historic Environment Scotland's HLAMap has highlighted the surrounding landscape to consist of a combination of plantation, designed landscapes, and rough grazing. The A9 carriageway forms an engineered corridor in the landscape.

Biodiversity

The scheme is adjacent to the Drumochter Hills Special Area of Conservation (SAC) (site code 8243; SiteLink (nature.scot)) and Drumochter Hills Special Protection Area

(SPA) (site code 8491; SiteLink (nature.scot)) in the northern part of the scheme extent.

The scheme overlaps part of the Drumochter Hills Site of Special Scientific Interest (SSSI) (site code 541; SiteLink (nature.scot)) in the northern part of the scheme extent.

The scheme also overlaps part of Glen Garry SSSI (site code 710; SiteLink (nature.scot)) in the southern part of the scheme extent. This SSSI is designated for Dalriadan geology and is discussed in the 'Geology and soils' baseline section below.

The works fall under the Operations Requiring Consent (ORC) for both of these SSSI, and as such SSSI consent is required for both Drumochter SSSI and Glen Garry SSSI.

Giant hogweed (*Heracleum mantegazzianum*), an injurious invasive non-native species (INNS) has been recorded by the NBN Atlas within 2km of the works; approximately 560m away at its closest recorded location.

Transport Scotland's Asset Management Performance System (AMPS) holds several records of the injurious weed common ragwort (*Jacobaea vulgaris*) within the verges of the A9 carriageway in the southern part of the scheme extent.

No other injurious weeds or invasive non-native species (INNS) have been recorded on AMPS on NBN in proximity to the scheme.

There are no Tree Preservation Orders (TPOs) located within 300m of the scheme (Scotland's environment web).

Habitat surrounding the scheme is predominately comprised of upland glens and forestry. Freshwater habitat is provided by the River Garry which flows parallel to the A9 carriageway.

There is one area of ancient (of semi-natural origin) woodland listed on the Ancient Woodland Inventory (AWI) which lies approximately 100m south from the A9 within the southern part of the scheme extent (Scotland's environment).

Considering the highly localised and minor nature of the works and the existing traffic levels on the A9 at the scheme extent, it is considered unlikely that any terrestrial mammal species of conservation importance are associated with permanent habitat or resting places within the area of likely construction disturbance. Therefore, a field survey has been ruled out, and a desktop study has been deemed sufficient for this assessment.

Geology and soils

Two Geological Conservation Review Sites (GCRS) are found within proximity of the scheme location (Scotland's environment):

- A9 Road Cuttings and River Garry Gorge overlaps the A9 carriageway at several points within the southern scheme extent.
- Allt Dubhaig GCRS is located 110m west of the northern scheme extent.

In addition, there are two SSSIs designated for geological features located within 300m of the scheme extent, including:

- Drumochter Hills SSSI (SiteLink (nature.scot)), which overlaps part of the northern scheme extent and is designated for Fluvial Geomorphology of Scotland.
- Glen Garry SSSI (site code 710; SiteLink (nature.scot)), which overlaps part of the southern scheme extent and is designated for Dalradian geology.

Signage works and/or vegetation clearance within the SSSI boundaries will entail activities within the list of operations requiring consent for these sites (e.g., vegetation clearance, earthworks). Applications for SSSI consent will be submitted to NatureScot to permit works within both SSSIs. As A9 Road Cuttings and River Garry Gorge GCRS overlaps with Glen Garry SSSI, any consent to permit works within the SSSI should also permit works within the GCRS. No works will take place within the SSSIs until consent is in place.

Soils within the scheme are recorded as peaty gleyed podzols (Scotland's Soils).

Bedrock geology within the scheme extent is recorded as Gaick Psammite Formation (Psammite), which is a metamorphic bedrock, and superficial deposits are recorded as hummocky (moundy) glacial deposits (Diamicton, sand and gravel), which is a sedimentary superficial deposit type (British Geological Survey).

Material assets and waste

Materials to be used will consist of:

- Signs
- Posts
- Hazard marker posts
- Concrete

The waste material from this project is anticipated to include old aluminium signs and steel posts, both of which are 100% recyclable. Some new signs will be attached to pre-existing posts to reduce the amount of waste. Vegetation removed will be disposed of appropriately in line with the NW NMC Contract (Schedule 5, Appendix 0/1, 3010SR Maintenance of Established Trees and Shrubs).

As the value of the scheme does not exceed £350,000, a Site Waste Management Plan (SWMP) is not required for these works.

Noise and vibration

There are approximately six residential properties within 300m of the A9 along the full scheme extent. The closest property is located within the southern part of the scheme and sits approximately 30m south of the A9. The property is screened from the A9 by a line of mature trees. The other five residential properties are located approximately 60m south of the A9 at numerous points along the scheme extent. No other sensitive properties are located within 300m of the scheme.

The scheme does not fall within a Candidate Noise Management Area (CNMA) as defined by the Transportation Noise Action Plan (TNAP).

There is no noise modelled data for the scheme (Scotland's Noise Map). Given the rural nature of the area, it is considered likely that baseline noise levels will be low, with noise mainly influenced by vehicles travelling along the busy A9 trunk road.

Population and human health

There are approximately six residential properties within 300m of the A9 carriageway, distributed over the full scheme extent. The closest property is found 30m south of the A9. The other five residential properties are located approximately 60m south of the A9 at various locations along the scheme extent.

Access to all properties is via numerous accesses or on-off-slip roads along the A9 within the scheme. There are also several laybys found on the northbound and southbound A9 carriageways within the scheme extents.

There is one National Cycle Network Route which is located within the scheme extent. Route 7 is broken up into sections between Sunderland and Inverness, forming parts of the famous Sea to Sea (C2C) cycle route (OS Maps).

There is one Core Path located within 300m of the northern part of the scheme, which is part of the Core Paths linked with the Cairngorms National Park (Highland Council).

TM is likely to entail single lane closures with a 30mph speed limit and will be in line with recommendations and guidance in The Traffic Signs Manual Chapter 8.

The A9 Trunk Road, within the North West, connects Perth with Thurso. It commences immediately north of Inveralmond Roundabout in Perth leading generally northwards for 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 works are located within a section of dual carriageway on the A9.

Road drainage and the water environment

The Rannoch groundwater body (ID 150691) underlies this scheme and has been classified by the Scottish Environmental Protection Agency (SEPA) under the Water Framework Directive 2000/60/EC (WFD) as having an overall status of 'good' in 2020 (SEPA Water Classification Hub). This groundwater body is designated as a Drinking Water Protected Area (DWPA).

Surface waterbodies in the vicinity of the scheme extent include (SEPA):

- River Truim (ID 23638) which has been classified by SEPA as having an overall status of 'moderate' in 2020. It forms part of the River Spey catchment of the Scotland river basin district. The River Truim crosses the A9 within the northern scheme extent and runs parallel to the west of the A9 and railway line.
- Allt Coire Dhomhain (ID 6610) which has been classified by SEPA as having an overall status of 'poor' in 2020. It forms part of the River Tay catchment of the Scotland river basin district. It runs to the west of the A9 carriageway, flowing adjacent to the trunk road and railway line.
- River Garry (Loch Garry to Garry Intake; ID 6912) which has been classified by SEPA as having an overall status of 'poor ecological potential' in 2020. The River Garry forms part of the River Tay catchment of the Scotland river basin district. This stretch of the River Garry runs parallel to the A9 carriageway within the northern section of the scheme and is connected to Loch Garry.
- River Garry (Garry Intake to Errochty Water; ID 6911) which has been classified by SEPA as having an overall status of 'good ecological potential' in 2020. The River Garry forms part of the River Tay catchment of the Scotland river basin district. This stretch of the River Garry runs parallel to the A9 carriageway within the southern section of the scheme and is connected to Loch Garry.
- Several unclassified watercourses/field drains are culverted below and flow within proximity of the A9 carriageway at the scheme location.

The northern section of the scheme has no specific risk of flooding from rivers or surface water (Risk Result - Flood Maps | SEPA).

The southern section of the scheme has a high risk of surface water flooding (each year this area has a 10% chance of flooding), however no flood risk associated with River Garry has been highlighted within the scheme extents (Risk Result - Flood Maps | SEPA).

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 CO_2 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, considering 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 to minimise emissions.
- Green driving techniques will be adopted, and effective route preparation and planning shall 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.
- Activities involving cutting/breaking out will be appropriately managed to reduce the potential for dust creation. This will involve use of measures such as dampening down or on tool extraction where required.
- Material stockpiles will be reduced as much 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 will be removed from site as soon as is practicable.
- Good housekeeping will be employed throughout the work.

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 RoD.

Cultural heritage

Although there are features of cultural heritage interest within 300m of the scheme extent, works will be restricted to made ground within the trunk road boundary where construction of the A9 is likely to have removed any archaeological remains that may have been present. Therefore, the potential for the presence of unknown archaeological remains in the study area has been assessed to be low. The works do not include any alterations that would affect the historic and architectural character of any nearby cultural heritage features.

The following good practice measures will be in place to reduce the risk of impacts to undiscovered features of cultural heritage interest:

- Should any unexpected archaeological evidence be discovered, works will stop temporarily in the vicinity and the BEAR Scotland Environment Team contacted for advice.
- People, plant, and materials will, as much as is reasonably practicable, only be present on areas of made / engineered ground. Where access out with these areas is required for the safe and effective completion of the scheme, it will be reduced as much as is reasonably practicable and ideally be limited to access on foot.
- There will be no storage of vehicles, plant, or materials against any buildings, walls or fences.

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

Landscape and visual effects

There is potential for minor visual impacts to Cairngorms National Park and the local landscape during the works as a result of new signage, littering, or obstructed views due to materials, vehicles and machinery. However, like-for-like replacement of signs will be undertaken where possible and new signage will be in keeping with other local signage. Proposed works will be restricted to the carriageway and verges on the A9, and land use will not change because of the works. Cairngorms National Park has been consulted regarding the proposed works but have not provided a response to date. The following mitigation measures will be put in place:

- 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.

- Works will avoid encroaching on land and areas where work is not required or is not permitted. This includes general works, storage of equipment/containers and parking.
- Where applicable, upon completion of the works, any damage to the local landscape will be reinstated as much as is practicable.
- The site will be left clean and tidy following completion of the works.

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

Activities undertaken on site could potentially have a temporary adverse impact on biodiversity as a result of an increased vehicle presence and the potential for disturbance to protected species and pollution of habitats. Although the scheme lies adjacent to Drumochter Hills SAC and SPA, a Habitats Regulations Appraisal (HRA) concluded that the works would not result in potential for any likely significant effects (LSE) upon the qualifying features by virtue of the following factors:

- The SAC is designated for habitats with no works required within any part of the SAC, and there is no requirement for land take, site clearance or vegetation management from within the SAC. There is also no requirement for 'in-water' works, and as such no hydrological connectivity exists between the proposed works and SAC features.
- Works will be restricted to signage amendments within the verges adjacent to the A9 carriageway. The works are not expected to increase noise levels above the baseline, and as such any potential noise disturbance is negligible.
- All works are restricted to the A9 carriageway boundary and works will not involve any change of the natural landscape or its processes.
- The risk of loss of containment is considered very low given the nature of the works and the standard industry pollution prevention practices that will be adhered to throughout the works.

The northern part of the scheme lies within Drumochter Hills SSSI, the works are very minor, highly localised within the verges of the A9 carriageway, and will be carried out during daylight hours over a short timeframe. In addition, noise levels associated with the works are not expected to deviate significantly from baseline levels due to traffic on the A9, and standard containment measures will be in place. Therefore, no significant negative impacts have been identified on the qualifying biodiversity features of the SSSI as a result of proposed works. An application for

SSSI consent will be submitted to NatureScot to permit excavation and vegetation removal for signage works within the SSSI, as these activities fall within the list of operations requiring consent.

The injurious weed species common ragwort is located within the verges of the A9 carriageway within the scheme extent, and giant hogweed has been recorded in the wider area. No further injurious weeds or INNS have been recorded within the footprint of works for installation of new signage. Lack of records does not preclude presence of INNS/injurious weeds from within the works area, and as such there is potential for these to be present. Site staff will be advised of INNS potential and instructed to contact the BEAR Scotland Environment Team if any excavation works within areas of INNS are required. A toolbox talk for working near INNS will be included in the SEMP and adhered to on site.

Pollution controls and good practice measures to reduce impacts of works on the local environment will be detailed in the SEMP and adhered to on site. Any protected species in the area are likely to be accustomed to road noise on the A9 and the scheme is of a temporary nature with works undertaken during daylight hours. Therefore, with the following mitigation measures in place, the risk of significant impacts on biodiversity are considered to be low:

- For works within Drumochter Hills SSSI that entail operations requiring consent for these sites (e.g., earthworks, vegetation clearance), no works will take place until SSSI consent is in place.
- Works will be strictly limited to areas required for access and works. Unnecessary encroachment onto terrestrial or aquatic areas will not be tolerated. No in-stream works will be undertaken.
- All construction operatives will be briefed through toolbox talks prior to works commencing. The toolbox talks will provide information on the legislation, general ecology, and best practice measures for relevant protected species.
- Site personnel will remain vigilant for the presence of any protected species throughout the works period. Should a protected species be noted during construction, works will temporarily halt until the species has sufficiently moved on. Any sightings of protected species will be reported to the BEAR Scotland Environmental Team.
- Operatives will made aware of invasive plant species in the area and biosecurity and other measures to avoid the spread of INNS will be stated in the SEMP and adhered to on site. Should any INNS be identified in working areas, no works shall take place within 7m of these areas until the BEAR Scotland Environment Team can provide further advice on additional mitigation measures.

- A ‘soft start’ will be implemented on site each day. This will involve switching on vehicles and checking under/around vehicles and the immediate work area for mammals prior to works commencing to ensure none are present and that there is a gradual increase in noise.
- Any excavations, exposed pipes/drains, or areas where an animal could become trapped (e.g., storage containers) will be covered over when not in use, at the end of each shift, and following completion of 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.
- Any temporary lighting used during periods of low light levels will be directional, and will avoid spilling into sensitive areas where possible.

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

The scheme is located within Drumochter Hills SSSI and Glen Garry SSSI, which are both designated for geological features. In addition, Glen Garry SSSI is partially overlapped by A9 Road Cuttings and River Garry Gorge GCRS. Several signage locations are located within each SSSI and entail works such as excavation and vegetation removal that fall within the list of operations requiring consent for each SSSI. Therefore, this scheme requires consent from NatureScot prior to any works, and applications for SSSI consent will be submitted. Provided that SSSI consent is granted, no significant negative impacts on either SSSI or the GCRS have been identified due to the following reasons:

- For works within Glen Garry SSSI (and the associated GCRS) and Drumochter Hills SSSI that entail operations requiring consent for these sites (e.g., earthworks, vegetation clearance), no works will take place until SSSI consent is in place.
- All works are restricted to made ground within the footprint of the A9 trunk road, with only very minor excavation and vegetation trimming being undertaken, which will not entail any impacts to the underlying geology.
- Works will follow best practice and will not promote the known negative pressures on the features; no development or dumping/storage of materials will occur out with the existing engineered carriageway boundary.

- Standard good practice measures, like containment measures for working near water, to prevent water and soil pollution will be detailed in the SEMP and adhered to on site.

Although works include excavation, construction activities are restricted to the already engineered layers of the A9 carriageway and verges, so are not anticipated to have an adverse impact on geology and soils. With the following mitigation measures in place, the likelihood of significant impacts on the geology and soils is low.

- 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) will be reinstated as much as is practicable.
- Mitigation measures to prevent contamination of soils through loss of containment will be strictly adhered to.
- Topsoil and subsoil reused on site will be spread evenly in a single layer less than 200 mm in height to ensure the soil profile is maintained across the works location.
- Multiple handling of soil derived from excavations will be minimised. The extent and duration of exposed soil will be kept to the minimum required for the works.

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 will 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.
- Vegetation removed will be disposed of appropriately in line with the NW NMC Contract (Schedule 5, Appendix 0/1, 3010SR Maintenance of Established Trees and Shrubs).
- 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 be available for inspection. A copy of the Duty of Care paperwork shall be provided and filed appropriately in accordance with the Code of Practice (as made under Section 34 of Environmental Protection Act 1990 as amended).
- Re-use and recycling of waste will be encouraged, and the subcontractor will be required to fully outline their plans and provide documentary evidence for waste arising from the works (e.g., waste carrier's licence, transfer notes, and waste exemption certificates).
- Staff will be informed that littering will not be tolerated. Staff will be encouraged to collect any litter seen on site.
- Where applicable, all temporary signage will be removed from site on completion of the works.

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

The proposed works have the potential to cause noise and vibration impacts through the use of equipment and construction vehicles for the proposed activities. Works will

be undertaken during a daytime working programme and several properties lie within 300m of the scheme. Due to the short duration and localised nature of the works, the scheme is anticipated to result in temporary minor noise impacts during construction. The following mitigation measures will be put in place:

- The Best Practicable Means, as defined in Section 72 of the Control of Pollution Act 1974, will be always employed to reduce noise to a minimum.
- Where applicable, residents within 300m of the scheme will be notified in advance of the works, likely by a letter drop. This notification will include details of proposed nature, timings and duration of the works, and a 24-hour contact number for the BEAR Scotland Control Room.
- 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.
- 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 TM measures. 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 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:

- Notification will be issued to local residents and local public transport operators prior to commencement of the works, advising of any proposed works and expected restrictions.
- Any changes of schedule (e.g. change from daytime works to night-time works) will be communicated to local residents and the Local Authority (Environmental Health Team) throughout the programme.
- Appropriate provisions / measures will be implemented within the TM to allow the safe passage of NMUs of all abilities through the site.
- Journey planning information will be available for drivers online at the Traffic Scotland website. Journey planning information will also be available for drivers online through BEAR Scotland's social media platforms.
- Works will be undertaken out with the peak tourist season if possible.
- Works will be carried out during daylight hours.

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 the 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 will be 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 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 will 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 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/or suppliers to be used wherever possible to reduce carbon footprint from transportation.
- Where possible, materials will be sourced locally to reduce greenhouse gas emissions associated with materials movement.
- Any waste that cannot be reused or recycled will be disposed of at local landfills to reduce carbon footprint from transportation of waste.

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.

Vulnerability of the project to risks

The northern section of the scheme has no specific risk of flooding from rivers or surface water (Risk Result - Flood Maps | SEPA).

The southern section of the scheme has a high risk of surface water flooding (each year this area has a 10% chance of flooding), however no flood risk associated with River Garry has been highlighted within the scheme extents (Risk Result – Flood Maps | SEPA).

Works will be programmed as far as is reasonably practicable to avoid periods of adverse weather or heavy rainfall.

Works are restricted to the A9 carriageway boundary (including verges), and any TM will be designed in line with existing guidance. TM will likely entail single lane closures with a 30mph speed limit. Where required, alternative pedestrian routes will be included in the TM setup, to minimise impact of the works on NMUs.

A Traffic Management Plan (TMP), which includes measures to avoid or reduce disruption to road traffic, will be produced in accordance with the Traffic Signs Manual (Department of Transport 2009). The TMP will ensure that there is no severance of community assets, access routes or residential development.

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 low.

Assessment of cumulative effects

During construction, activities associated with the works may create several types of minor temporary disturbances such as changes to noise and vibration and air quality. However, these impacts will be temporary in nature and are not anticipated to result in a significant cumulative effect.

A search of the Highland Council Planning Portal identified no planning applications within 300m of the scheme (Simple Search (highland.gov.uk)).

A search of the Scottish Road Works Online has identified that there are currently three roadwork projects taking place within the scheme location and one scheduled for early next year:

- Lining works on the A9 from the access road into Dalnaspidal Lodge to the entrance to Glackmore Farm, Calvine. This is due be carried out from between 13/12/2023 to 29/12/2023 for a duration of 3 days.
- Signing Improvements on the A9 from the access road into Dalnaspidal Lodge to the entrance to Glackmore Farm, Calvine. This is due to start between 08/01/2024 – 16/01/2024 for a duration of 21 working days.

The proposed lining works will take place within the southern scheme section. Lining works and associated TM will utilise a road marking vehicle and will be mobile in nature, travelling slowly along the A9. There is potential for slight overlap of works due to location and timings, however any impact to journey times will be minor, and mitigated further still by presence of intermittent sections of dual carriageway to allow ease of traffic flow. Similarly, signing improvements are planned for within the same scheme southern scheme section. In the event that works overlap, the combination of verge working and minor TM requirements where required will not result in any significant increase in journey times for users of the A9 carriageway. TM may be combined for these nearby schemes, resulting in a further reduction in potential combined impact.

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

The HRA undertaken to assess potential effects of the works on the Drumochter Hills SAC/SPA did not identify potential for any LSE on the qualifying features of the Drumochter Hills SAC/SPA due to the nature and scale of the works and limited pathway to effect.

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 in whole or in part in Cairngorms National Park, Drumochter Hills SSSI, and Glen Garry SSSI, which are sensitive areas within the meaning of regulation 2(1) of the Environmental Impact Assessment (Scotland) Regulations 1999.

The project has been subject to screening using the Annex III criteria to determine whether a formal Environmental Impact Assessment is required under the Roads (Scotland) Act 1984 (as amended by The Roads (Scotland) Act 1984 (Environmental Impact Assessment) Regulations 2017). Screening using Annex III criteria, reference to consultations undertaken and review of available information has not identified the need for a statutory EIA.

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

Characteristics of the scheme:

- The total working area of the scheme is less than 1 ha and will be restricted to the A9 carriageway boundary (including verges).

- The works will be temporary, highly localised, and undertaken during daylight hours.
- Works are not expected to result in significant disturbance to protected species that may be present in the wider area.
- No in-combination effects have been identified.
- The risk of major accidents or disasters is considered to be low.
- The works are essential to improve road signage within the scheme extent and create safer conditions for road users on the A9.
- Any potential adverse impacts of the works are expected to be temporary, short-term, non-significant, and limited to the construction phase.
- 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 due to improved road safety.

Location of the scheme:

- Although works are located adjacent to the Drumochter Hills SAC/SPA, the HRA did not identify the potential for any LSE on the qualifying features of the SAC due to the nature and scale of the works and limited pathway to effect.
- Although some working areas are located within the Drumochter Hills SSSI, no significant negative impacts have been identified on the qualifying features of the SSSI as a result of the proposed works and no works will take place within the SSSI until SSSI consent has been granted by NatureScot.
- Although some working areas are located within the boundaries of Glen Garry SSSI and A9 Road Cuttings and River Garry Gorge GCRS, no significant negative impacts have been identified on the qualifying features of the SSSI/GCRS as a result of the proposed works and no works will take within the SSSI/GCRS until SSSI consent has been granted by NatureScot.
- Road signage will be replaced where possible, and any permanent changes will be localised within the A9 boundaries and will be in keeping with existing street furniture.
- Consultation with the Cairngorms National Park has been carried out to identify any concerns regarding the proposed works, but no response has been received to date. No significant visual impacts on the National Park have been identified as a result of the works.
- The works are not expected to result in any alteration to existing cultural heritage features or exposure of potentially undiscovered features of cultural heritage.
- The scheme will be confined within the existing carriageway and verges and will not require any land take or alter any local land uses.
- No site compound is required for this project.

Characteristics of potential impacts of the scheme:

- INNS and injurious weeds have been recorded within proximity of the scheme extent and as such there is potential for the works to result in disturbance to or spread of these, however, biosecurity measures and measures to prevent the spread of INNS will be detailed in the SEMP and adhered to on site.
- Containment measures will be in place to prevent debris and pollutants from entering the surrounding environment.
- Measures will be in place to ensure appropriate removal and disposal of waste.
- The SEMP will include plans to address environmental incidents.
- Mitigation measures detailed above and in the SEMP are put in place with the objective to prevent and, if required, subsequently control any potential impacts on sensitive receptors.
- 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.
- No in-combination effects have been identified.

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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