



A9 Dualling Programme

SEA Environmental Report

Appendix B

Scoping Report Response Tables

June 2013



A9 Dualling SEA Environmental Report – Appendix B – Scoping Report Response Tables

A9 Dualling SEA Scoping Report – Statutory Consultee Feedback	SEA Comment
SNH	
<p>General comments</p> <p>We welcome this clearly presented, highly readable and succinct scoping report.</p> <p>The use of comprehensive worked examples is very helpful at this stage, and we have provided advice which we hope will be useful in revising these.</p>	<p>Comment noted and welcomed</p>
<p>Scope of assessment and level of detail</p> <p>We currently have some specific concerns about the assessment process proposed in the SEA.</p> <p>In particular, we have made detailed comments on the proposed SEA assessment questions, the level of the assessment in relation to the 7 study areas, mitigation and enhancement and cumulative effects.</p> <p>Our recommendations are aimed at increasing the SEA's focus and accuracy of assessment, and ensuring that the SEA meaningfully predicts potential significant environmental effects at this stage of the process.</p> <p>Overall, we are content with the scoping of issues, and support the comprehensive approach and mapping of the baseline information.</p> <p>We welcome the intent to add to this data as required.</p> <p>We would be pleased to provide any further baseline information we hold as required.</p>	<p>Comments noted</p> <p>Individual comments addressed below.</p>
<p>Consultation period for the Environmental Report</p> <p>We note that the Environmental Report is proposed to be submitted in April or May 2013 and that the consultation period is to be discussed and agreed with the Consultation Authorities prior to submission.</p> <p>We suggest a period of 8 to 12 weeks for this.</p>	<p>Environmental Report consultation period has been agreed as 8 weeks from 3 June 2013</p>
<p>1. Relationship with other Plans, Programmes and Strategies (scoping questions 13)</p> <p>The explanation of the strategic transport planning hierarchy in section 3.1 is useful.</p> <p>We consider the list of other PPS summarised in section 3.2 and provided in Appendix A is comprehensive.</p> <p>We note this has been updated since the Strategic Transport Projects Review SEA.</p>	<p>Noted.</p>
<p>Appendix A detailed comments</p> <p>1. Habitats Regulations: text in final column</p> <p>"Where likely significant effects are identified, appropriate plan/ programme level mitigation options will be identified in consultation with SNH."</p> <p>This should be amended to state that where likely significant effects are identified then appropriate assessment of the plan is required to be undertaken.</p>	<p>Comment noted and the Environmental Report makes reference to the requirement for an Appropriate Assessment that will be undertaken prior to drafting the SEA Post Adoption Statement</p>

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<p>16. Luncarty to Pass of Birnam: the text in the final column refers to a wide range of specific impacts. However this approach is inconsistent with other similar sections.</p> <p>For example Habitats Regulations Appraisal (HRA) screening due to proximity to River Tay Special Area of Conservation (SAC) but this text is not repeated for (18) Pass of Birnam to Tay Crossing where it is also relevant.</p> <p>It is important that there is consistency in the assessment process.</p>	<p>Noted.</p> <p>Information for #16 was taken from published scheme documents.</p> <p>No such information was available for #18 at the time of writing – text for #18 states that a project level EA is in preparation.</p>
<p>Table 3.3 - Planning principles:</p> <p>We welcome the preliminary list of principles and that these will be tailored/ more specific with recommendations produced in the Environmental Report (ER).</p> <p>We will be pleased to comment on a finalised list in due course, but a general comment is that as a bench mark we support the use of terminology such as avoidance and enhancement rather than 'minimise' for example.</p> <p>Please see our comments below in relation to the assessment process.</p> <p>Clarification as to how the environmental principles will be used in the assessment process would be useful.</p>	<p>Comment noted.</p> <p>The SEA has considered which corridor options will avoid constraints, and which will minimise risks when avoidance is not possible.</p> <p>Later route alignment studies will be better placed to consider avoidance mechanisms within a corridor boundary.</p>
<p>2. Environmental Baseline (scoping questions 4-5)</p> <p>GIS approach/ study areas (section 4.1-4.2)</p> <p>We note that the approach proposed to collation of baseline information is to adopt GIS mapping which will initially identify the locations of features/ constraints within 1km of the current A9.</p> <p>However, this is not suitable for landscape assessment where effects could extend well beyond 1km, and will vary depending on topography, size of structures (embankments, bridges etc) as well as the landscape.</p> <p>We suggest effects are informed by the landscape and visual assessment which we note will be carried out in time to inform the ER.</p> <p>We will be pleased to comment on a proposed assessment process for landscape and visual impacts based on this a wider zone.</p>	<p>A route-wide theoretical Zone of Visual Influence (ZVI) has been developed and a Landscape Review has considering the range of landscape character zones along the A9.</p> <p>The Landscape Review aims to identify key landscape issues and opportunities, and develop strategic principles, rather than conduct a detailed landscape assessment.</p> <p>The SEA does not provide a Landscape and Visual Impact Assessment, as these exercises will be undertaken at more detailed DMRB route alignment and detailed design stages.</p>
<p>We welcome consideration of the Natura sites within a wider 5 km zone, plus additional sites beyond this as agreed with SNH.</p>	<p>Noted.</p>
<p>Baseline information for associated works</p> <p>There may be significant off line proposals or ancillary works such as new bridges or new roads where junction closures off the A9 are proposed.</p> <p>We would expect mapping of baseline information and assessment of environmental effects for these in the same way as for the existing road line, and as more information about their possible locations becomes available.</p> <p>Please could you provide further information on the assessment methodology.</p>	<p>The SEA is considering broader corridor options and aims to identify the strategic issues within corridors.</p> <p>Baseline information for associated works is not possible at this stage as locations are not determined; locations of new junctions/ crossings/ structures will be developed under later design stages and informed by more detailed consultation at the local level</p>

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<p>Baseline data (section 4.2)</p> <p>We welcome the breakdown of the data into 7 study areas and are content with the boundaries of these areas.</p>	<p>Noted.</p> <p>There has since been a change from 7 study areas identified in the Scoping Report to 6 sections to align with the PES sections.</p> <p>The changes are discussed in Section 3 of the Environmental Report.</p>
<p>Appendix B – mapping</p> <p>The format of the preliminary constraint maps generally provides very clear presentation of the GIS data.</p> <p>We recommend the following in relation to presentation of maps for each study area to improve their clarity</p>	<p>GIS maps have been revised for presentation in the Environmental Report to incorporate additional data and improve clarity – see Appendix F.</p>
<ul style="list-style-type: none"> Present all SSSIs on a separate map base. As currently presented, the maps with SSSIs (mixed and biological) plus “semi natural ancient woodland” and “ancient woodland” appear cluttered, and geological SSSIs are also on a separate map. 	<p>Noted.</p> <p>Have been separated onto individual maps.</p> <p>Areas identified as Ancient or Semi Natural Ancient Woodland have been mapped directly from the inventory sources noted.</p>
<ul style="list-style-type: none"> Separate out woodland datasets and put onto a separate map. Clarify what is meant by “semi-natural ancient woodland” as opposed to “ancient woodland”. We recommend mapping areas of the ‘Scottish semi-natural woodland Inventory’ and also the “Ancient Woodland Inventory.” 	
<ul style="list-style-type: none"> We are not sure what the term “mixed SSSI” refers to - please delete. 	<p>This is the term used in the GIS shape files provided by SNH:</p> <p><i>“SSSIs containing geological/ geomorphological or geo features may be designated either solely for their geo interest ('geo SSSIs'), or have an additionally biological interest ('mixed SSSIs').”</i></p> <p>Definition from: http://www.snh.gov.uk/protecting-scotlands-nature/safeguarding-geodiversity/protecting/geological-conservation/ Accessed 11-03-2013</p> <p>Therefore GIS maps and any discussion of SSSI in the Environmental Report has continued to refer to ‘mixed SSSI’ where appropriate.</p>
<ul style="list-style-type: none"> The scale and colouring make SAC boundaries difficult to see in places, particularly the river SAC tributaries (Tay & Spey). Recommend amending these so they are more distinct. 	<p>Agreed.</p> <p>Site boundary colouring has been revised.</p>

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<ul style="list-style-type: none"> Study area 5 – SSSI maps: the River Spey SSSI is shown as 'mixed SSSI' in parts on geological map and biological & mixed on other map. However, the River Spey SSSI is notified for 4 species – freshwater pearl mussels, otters, salmon & sea lamprey, but not geological features. 	Information on SSSI maps has been reviewed as noted.
<p>Table 4.4 – Additional datasets</p> <p>We welcome the comment that as additional data is obtained, the constraint maps will be updated accordingly.</p> <p>Biodiversity:</p> <ul style="list-style-type: none"> The link to the Deer Vehicle Collisions in Scotland Monitoring Project 2008-2011 report is: http://www.snh.gov.uk/docs/C326794.pdf The link to the wildcat project report is: http://www.snh.gov.uk/protectingscotlandsnature/speciesactionframework/speciesactionlist/wildcat/update/ http://cairngorms.co.uk/resource/docs/publications/30082012/CNPA.Paper.1838.Cairngorms%20Wildcat%20Project%20-%20final%20report.pdf <p>-Information on impacts of lighting on species was provided to Steve Isaacs (Halcrow) on 18/12/12</p>	<p>Reports received and considered in the Environmental Report.</p> <p>No GIS shape files were provided for the deer report no data added to the GIS databank.</p> <p>National Biodiversity Network data on wildcat was added.</p>
<p>Landscape:</p> <p>Add local landscape designations.</p>	No GIS shape file data on local landscape designations was sourced; however, the Landscape Review considers local designations.
<p>Please clarify what 'special landscape areas' constitute.</p> <p>This term is referred to in the scoping document</p> <p>– for example the "Special Landscape Areas" of Ben Alder, Laggan and Glen Banchor are listed for study area 5 (Appendix C).</p>	<p>Definition of Special Landscape Areas is on SNH website at: http://www.snh.gov.uk/protecting-scotlands-nature/protected-areas/local-designations/special-landscape-area/</p>
Add "Wild land areas of search" - available from SNH.	Data sets received and added to GIS databank.
Add "Landscape study to inform planning for wind energy" - Perth and Kinross Council, Final report 5, November 2010.	<p>No GIS shape files sourced.</p> <p>Study considered by Landscape Review team.</p>
<p>Soils:</p> <p>Carbon rich soils: we understand the James Hutton Institute holds this data.</p>	Data sets received and added to GIS databank – discussed in Section 5 of the Environmental Report.
We have already provided soil data for the CNP, Highland Council area & Perth & Kinross area (24 December 2012).	Data sets received and added to GIS databank.
<p>Geodiversity:</p> <p>as well as GCR sites, add regionally and locally important geological sites.</p>	SEA team was unable to source relevant GIS shape files for RIGS/ LIGS, so these features need to be identified as a data gap.

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<p>Human environment: Add data for long distance routes and key recreational assets</p>	<p>SEA team was unable to source relevant GIS shape files, so features need to identified as a data gap. The A9 PES team is collating a more detailed baseline for an emerging Non Motorised Users Strategy.</p>
<p>Key features/ resource constraints Table 4.5 summarises key features/ resource constraints in each study area. For each study area, we recommend for clarity that these are listed under the SEA topics, as shown in Appendix C. For example, listing the significant biological designations under the header 'biodiversity, flora and fauna.' Species information is currently omitted from the summary, but we understand this will be updated once all the baseline information is collated. We will be pleased to comment on this and Appendix C at this stage.</p>	<p>Section 5 of the Environmental Report now discusses each key feature/ constraint under the relevant SEA topic heading. Species information on red squirrel, otter and wildcat was obtained from the National Biodiversity Network and added to the GIS databank.</p>
<p>Appendix C – baseline data review For all study areas we note that there is inconsistent mention of the proximity of the road corridor to some designations. For example, in relation to the River Tay & Spey SACs, and key issues tend to focus on the proximity to Natura sites, possibly overlooking other designations.</p>	<p>Noted.</p>
<p>There are only two mentions of road closures due to snow and we query if this is correct: Study area 4 (Glen Garry to Crubenmore) in 2009/2010 (page 15) and Study area 6 (Aviemore to Slochd). This is relevant to climate change and the resilience of the road (winter weather) - please see our response to SEA proposed assessment question 7.</p>	<p>The information was sourced from an A9 climate impacts study workshop report. Climatic factors are now scoped out of the assessment in the Environmental Report.</p>
<p>4.3 Scoping SEA issues We welcome the approach to set out in section 4.3.1 which provides likely inter-relationships with other SEA topics, and considers whether the issue should be considered as part of the SEA, or whether it is better suited to project level consideration and EIA (Appendix D). This is helpful in determining the level of assessment proposed.</p>	<p>Noted.</p>
<p>Throughout the Appendix we note the 5th column frequently uses generic wording such as “SEA will review, assess and inform developing strategies. SEA criteria to be determined as strategies develop.” It is unclear as to what this means. Likewise, the use of wording on the lines of “high level consideration to signpost issues and need for design guide /principles.” We welcome the use of the guide/ principles as a part of the assessment process especially in terms of enhancement/ mitigation, but please see our request under ‘further assessment’ for clarification as to the role the guide/ principles are proposed to play in</p>	<p>Section 5 of the ER includes preliminary reviews of emerging strategies, in terms of their outline principles, noting that the SEA has made recommendations. The design guide/ principles should be understood as an output from the A9 assessment processes, not a feature of the assessment.</p>

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the assessment.	
<p>Appendix D – detailed comments</p> <p>Page 5</p> <p>Highland mainline notes that</p> <p>“it is feasible that A9 and HML could be considering similar areas for dualling/ passing loops within the confines of the current corridor.”</p> <p>This is potentially a significant issue.</p> <p>How the timescale of this project dovetails with the A9 (and Beaulay – Denny works – page 6) could mean increased impacts, such as extended periods of disturbance for species.</p> <p>Please see our comments for assessment under cumulative impacts.</p>	<p>Noted.</p> <p>Section 5 of the ER considers the HML and BDL projects, noting that further contact will be made with the HML team, during the ER consultation period, to determine whether option sites for improvements are available.</p> <p>If so a more detailed cumulative impacts assessment will be completed for inclusion with the SEA Post Adoption Statement.</p>
<p>Page 8</p> <p>Accident reduction – see deer collision information available (link above) to inform this.</p>	<p>The deer collision report has been considered through the Environmental Report.</p>
<p>Page 12</p> <p>Landscape character areas – 4th column:</p> <p>references to definition of visual envelope, key viewpoints and references to wildness mapping are all supported.</p>	<p>Noted.</p> <p>Landscape review underway.</p>
<p>Page 13</p> <p>We note that ‘wildness’ is only considered for CNP.</p> <p>We recommend the same approach for areas with wild land characteristics for the route line outwith the Park.</p>	<p>Noted.</p> <p>SNH Search Areas for Wild Land composite wildness map data set added to GIS databank.</p>
<p>Page 19</p> <p>Drainage & hydrology, 5th column:</p> <p>“HRA will consider impacts on hydrology for designated sites.”</p> <p>This type of comment crops up in a few places. HRA is only applicable for European sites, and other designated sites need to be fully considered.</p>	<p>Noted.</p>
<p>Page 19</p> <p>Run-off & pollution events column</p> <p>“not considered a significant issue for this SEA”.</p> <p>Given the proximity of the road, (and likely construction footprint) for example to the Rivers Tay and Spey, regardless of the construction environmental management plan, is an important issue.</p>	<p>Agreed.</p> <p>This is an important issue; however, it is not considered to be a strategic issue for the SEA of corridor options.</p>
<p>3. Scoping of SEA topics (scoping questions 6-7)</p> <p>Section 4.4:</p> <p>We are content with the scoping of topics provided in Table 4.6.</p>	<p>Red squirrel, otter and wildcat data added under species.</p> <p>Various habitat types and sites considered</p>

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Please add species and habitats under “biodiversity, flora and fauna			under Section 5 of the ER.
4. SEA Assessment Framework SEA assessment questions (sections 4.3.2-8) – scoping questions 8 and 9. We have examined the assessment questions proposed which are relevant to our remit and hope the following comments will be helpful in focusing the assessment. We would welcome their discussion with you and the other Consultation Authorities.			Noted The assessment questions were discussed at meeting with SNH on 8-3-2013
A general comment is to replace wording of questions starting with ‘limit’ and ‘reduce’ with “avoid.” While we acknowledge that there will be loss/ adverse environmental effects, the use of ‘avoidance’ will provide a certain and consistent assessment standard and a more realistic ‘scoring’ of environmental effects.			The assessment questions were discussed at meeting with SNH on 8-3-2013
SNH Feedback on Proposed SEA Assessment Questions			The assessment questions were discussed at meeting with SNH on 8-3-2013. It was agreed that the assessment questions were appropriate for the strategic alternative assessment that was undertaken at the Scoping stage, however an ‘issue’ based assessment approach would be undertaken for the Environmental Report. An example of the detailed assessment process was issued to SNH for comment. Further SNH feedback was received and incorporated into the assessment where possible. Many of the individual questions/ issues were not considered at the route section level, but were considered at the route wide level, for example, signs, gantries, lighting were removed from section specific assessments as they added no value. Instead SEA recommended route wide principles and guidance.
Question in Scoping Report	Recommended Change	Comment on Change	
1. Deliver a fully dualled route	Delete	This is the aim of the plan rather than an assessment question.	
3. Maintain or increase road lighting provision in sensitive landscape areas	Delete	This is addressed under Q 22 ‘landscape’.	
4. Maintain or increase the number of signs/ gantries in sensitive landscape areas	Avoid increasing the number of	Move to landscape section.	
5. Maintain or increase the number of structures/ crossings in sensitive landscape areas	Avoid increasing the number of structures/ crossings in sensitive landscape areas’ (need to define ‘sensitive’ in SEA).	Move to landscape section.	
6. Maintain or improve lay-bys and rest area provisions (including viewpoint and interpretation opportunities).	Maintain or improve lay-bys and rest area provisions and locations for access, interpretation and improved siting and design.	See also question 18 where viewpoint and interpretation opportunities are addressed.	
7. Maintain or improve drainage and resilience of A9 infrastructure		We are unclear as to what this means. Please clarify the purpose of this question. It would be useful to focus this specifically on resilience to climate change, such as heavier snowfall/ severe flood events.	

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8. Limit resource consumption and waste generation	Avoid resource consumption and waste generation		Similarly, material resource consumption, waste generation, planned development were considered at the route wide level. Discussion on all of these issues is presented in Section 5 of the ER.
9. Facilitate current and planned development		We are unclear as to what this means. Please clarify the purpose of this question	
Population and human health			
11. Improve strategic connectivity between central belt and Inverness		We are unclear as to what this means. Please clarify the purpose of this question as this does not seem to an environmental issue under SEA.	Strategic connectivity with the central belt is now discussed as a driver for A9 dualling, and not assessed as an issue.
12. Maintain or improve access to the Cairngorms national park and other visitor attractions	Maintain or improve opportunities to access the Cairngorms national park and other visitor attractions		Access to and opportunities to stop in the National Park were discussed under both Population and Human Health (Access) and Landscape topics in Section 5 of the ER.
14. Maintain or improve access to core paths, rights of way, areas used for recreation and non-motorised users (NMUs)?	Maintain or improve non motorised access to core paths, rights of way, key routes used for recreation/ to access areas used for recreation		Non Motorised User access to recreation and public transport is discussed as a route wide issue, and not specifically assessed at the route section level.
Introduce additional question	Avoid vehicle collision risk with red deer.		Avoiding collisions with red deer is not considered an SEA issue, it is considered a potential local design and consultation issue.
Landscape Please split this section from 'historic and cultural environment' as this will allow for landscape effects to be more clearly identified and assessed.			Landscape and Historic Environment separated in the ER as advised.
17. Provide opportunities to stop in the Cairngorms national park.	Provide opportunities in terms of appropriately sited/ designed viewpoints and interpretation (including landscape, recreation, biodiversity, geological/ geodiversity /historic land use/ archaeological interpretation).	Move to 'population and human health' section as it primarily concerned enjoyment/ access to the environment.	Discussed under various topics, including for example, Landscape, Human Health, Soil.
19. Provide opportunities in terms of non-motorised recreational routes and visitor attractions.		Delete as covered by question 14.	

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20. Limit the potential visual effects on designated landscape areas (e.g. NSA and GDL.	Avoid adverse landscape and visual effects on NSAs and the CNP.		<p>The SEA does not provide a Landscape and Visual Impact Assessment as these will be conducted to inform the more detailed route alignment studies.</p> <p>Section 5 of the ER considers which corridor options would present the potential for more/ less impact on the Special Qualities of the NSAs and National Park.</p> <p>Section 5 also specifically considers issues on Gardens and Designed Landscapes.</p> <p>Local landscape designations have not been considered in the Environmental Report.</p> <p>Landscape Character has been considered via the ongoing Landscape Review and the Section 5 of the ER presents a summary of early findings in terms of landscape sensitivity.</p> <p>Discussed in Section of the ER, and will be considered further via the ongoing Landscape Review</p> <p>Specifically discussed in Section 5 of the ER.</p> <p>The experience of travellers on the route and views from the road is specifically discussed in Section 5 of the ER.</p> <p>Natura, Ramsar, SSSI sites are all discussed in Section 5 of the ER.</p> <p>The HRA Screening Report has been submitted</p>
Introduce additional question	Avoid adverse landscape and visual effects on the CNP.		
Introduce additional question	Avoid adverse landscape and visual effects on Gardens and Designed Landscapes		
Introduce additional question	Avoid adverse landscape and visual effects on local landscape designations.	Also need to clarify the term “special landscape areas” which is used in the scoping report.	
Introduce additional question	Avoid adverse effects on landscape character and visual amenity.	LCA coverage is at a scale that should help alignment and also detailed design so that road is better integrated with its surroundings (reducing impacts for those not on the road (wide constituency including residents, recreational users (also from elevated viewpoints) etc).	
21. Limit the potential effects on areas noted for wildness/ wild land.	Avoid adverse impacts on landscapes that display a high degree of wild land characteristics	Wildness and Search Areas for Wild Land mapping is available; also referred to in LCA (Drumochter area, for example).	
22. Limit the potential visual impact of additional lighting.	Avoid adverse landscape and visual impacts of additional lighting especially in landscapes where dark skies are a key characteristic.		
Introduce additional question	Avoid diluting/ homogenising the travellers’ experience of the distinctive variety of landscapes and landscape character along the route.	To recognise the importance of keeping distinct the different places the A9 travels through and experience of the range of landscapes.	
24. Directly affect protected biodiversity sites or species	Avoid negative effects on Natura and Ramsar sites		
Introduce additional question	Avoid negative effects on SSSIs		

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Introduce additional question	Avoid negative effects on locally important sites for biodiversity		to SNH for further comment, and the Environmental Report notes that further work is required on strategic programme level Appropriate Assessment, for completion prior to drafting the SEA Post Adoption Statement. Effects on species have been considered at a route wide rather than section specific level. Ancient and Semi Natural Ancient woodland has been specifically considered in Section 5 of the ER.
Introduce additional question	Avoid negative effects (both direct and indirect) on protected species such as wildcats, otters and red squirrels (including European Protected Species).		
Introduce additional question	Avoid negative effects on woodland including that are recorded in the Scottish Semi-natural Woodland Inventory and Ancient Woodland Inventory. Important sites for biodiversity		
25. Limit land take and the potential fragmentation of habitats	Avoid land take and the potential fragmentation of habitats and barrier effect impacts on species		Fragmentation and barrier effects are key issues discussed throughout the ER.
26. Provide opportunities for biodiversity connectivity in terms of green bridges/crossings	Delete.	This is covered in Question 26 above in relation to habitat fragmentation/ barrier effects. Mitigation and enhancement should be considered for all effects.	Green bridges are not discussed in the Environmental Report; however, other issues around species crossings are discussed. Specific provision of green bridges presents a number of conflicting issues and the SEA states an overarching principle on the avoidance of overhead structures.
27. Limit potential effects on habitat drainage/ hydrology	We are unclear as to what this means/ how impacts will be measured.	Please clarify the purpose of this question.	Should the consultees require specific consideration of green bridges, further discussion is required during the ER consultation period.
28. Provide biodiversity enhancement opportunities in terms of SUDS provision		This seems to be very specific in terms of SUDS enhancement but does not identify other enhancement opportunities.	SUDS, drainage, connectivity and lighting and are discussed through the ER. INNS issues are mentioned but not assessed as strategic issues, these would be considered at the detailed design survey and assessment stages. Not possible to consider options that avoid land take and soil sealing; all dualling options will
29. Limit the potential biodiversity impacts of additional lighting	Avoid negative biodiversity impacts of additional lighting.	We have provided information on biodiversity and lighting effects.	
30. Limit the potential spread of non-native invasive species (INNS)		We are unclear as to how impacts will be measured. Please clarify	
31. Minimise overall land take and soil sealing?	Avoid overall land take and soil sealing?		
32. Minimise the need for peat cutting?	Avoid the need for peat cutting		

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33. Minimise excavation/ construction on peat/ high carbon soils	Avoid excavation/ construction on peat/ high carbon soils		result in land take and soil sealing. This is one of the reasons why the initial range of questions used ‘minimise’ to compare between corridor options – an online widening option will limit land take/ sealing/ peat excavation further than a new, alternative corridor, but neither will avoid these impacts. Section 5 of the ER discusses a range of issues on peat, wetland and geological sites, including issues around potential opportunities at geodiversity sites. Not possible to consider options that avoid watercourse crossings and/ or areas of flood risk.
34. Maintain or minimise effects on hydrological and ecological integrity of peat/ wetland soils	Avoid effects on hydrological and ecological integrity of peat/ wetland soils	Please clarify how impacts will be measured.	
35. Maintain or improve the integrity/ condition of designated geological sites.	Avoid negative effects on the integrity/ condition of designated geological sites.	We welcome this cognisance of geological sites.	
36. Maintain or improve access to, and opportunities for interpretation of, geological sites/ features of interest.	Maintain or improve access to, and opportunities for interpretation of, geological sites/ features of interest, including GCR, regionally and locally important sites.	Please clarify how this will be measured.	
37. Maintain or increase the number of watercourse crossings	Delete	This seems to be the same question as 34 above.	Section 5 of the ER discusses a range of issues and make references to ongoing work on a route wide Strategic Flood Risk Assessment. Carbon issues are discussed under the Material Assets topic in Section 5 of the ER. Opportunities to increase sequestration are not specifically discussed, but would generally relate to landscaping and habitat measures.
43. Maintain or otherwise affect flood risk potential?	Avoid areas of flood risk		
44. Deliver low carbon (embodied and/ or emissions) over the infrastructure life cycle?		Please clarify how this will be measured.	
45. Provide opportunities to increase carbon sequestration?		Please clarify how this will be measured. Mitigation and enhancement should be considered for all effects.	
Assessment methodology (scoping questions 10-11) Preliminary Assessment of Strategic Alternatives (section 5.1) Example assessment matrixes – tables 5.2 and 5.3: We understand that the proposed approach for assessment of strategic alternatives is to assess the 3 strategic alternatives for the entire route (online widening, online widening and some offline, and alternative route) against the assessment questions. We support these 3 strategic alternatives for this initial assessment.			The preliminary assessment at Scoping stage was intended to compare the relative merits of 3 strategic alternatives for A9 dualling. The ER does not revise/ refine this assessment as the result is considered unlikely to change. Detailed assessment of corridor options (different from 3 strategic alternatives) has included a wider scale for effects, as presented in Appendix C.
We recommend the scoring for the assessments is refined to provide a wider scale of effects (i.e. --/+/+/++), or that the commentary is revised so that the most significant effects can be identified. We suggest agreement of the thresholds for recording these effects prior to the assessment taking place.			

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<p>Further assessment and level of detail for the ER (section 5.3)</p> <p>Para 1:</p> <p>The statement to keep later stages of assessment to the minimum required is noted.</p> <p>However, please see our comments in this response on the level of assessment needed.</p>	<p>Noted.</p> <p>However, actual text states:</p> <p>‘...to the minimum required to summarise indicative dualling route options as they are developed via Preliminary Engineering work’.</p>
<p>Para 2:</p> <p>In terms of further assessment, we understand the intent is to use the GIS constraint maps to assess local route options to best determine best fit through ‘constraints’.</p> <p>We acknowledge the statement that it is not possible to provide an example at this stage, but request that this is forwarded for our comment prior to commencement of the assessment.</p>	<p>Noted</p> <p>Indicative corridor options were discussed at a meeting with SNH on 8-3-2013.</p>
<p>Para 3:</p> <p>The proposed approach is noted, but we have some concerns about the level of detail proposed.</p> <p>For clarification, we expect this assessment to apply the full set of assessment questions separately for each of the 7 study areas.</p> <p>We would be pleased to comment on an example assessment template for a study area, or meet with you and the other Consultation Authorities to discuss the assessment methodology further.</p>	<p>Noted.</p> <p>The assessment methodology and question approach were discussed at a meeting with SNH on 8-3-2013.</p> <p>It was agreed that an issue based assessment approach would be undertaken for the each online corridor section and alternatives.</p> <p>An example of the detailed assessment matrix was provided for comment.</p> <p>SEA did not complete a detailed assessment matrix for near offline Options A6, B2, B5 as these were not considered sufficiently different from the online corridor.</p>
<p>We welcome the use of the commentary in the assessment.</p> <p>This should be of sufficient detail to identify any specific issues in relation to each assessment question for each study area (for example a SSSI that may be affected and the identification of significant environmental effects, or an Ancient Woodland Inventory site under the relevant assessment questions).</p> <p>We welcome the baseline information for the 7 study areas that is already being collated (table 4.5).</p>	
<p>Where there are potential issues between for example landscape and biodiversity impacts, we recommend these are also highlighted in the commentary.</p>	
<p>Para 4:</p> <p>We support the consideration of associated works with the main route line such as junctions and accesses, lay-bys and rest areas.</p> <p>There may also be additional works such as new/ diverted roads as a result of junction closures.</p> <p>These have the potential to generate significant environmental effects and we would expect the same level of mapping and assessment of these works.</p> <p>Please see our earlier comments in this response.</p>	<p>For clarification;</p> <p>The SEA will not consider associated <i>works</i>, the text explains that:</p> <p>“The ER will also include reviews of, and recommendations for, A9 route ‘strategies’ on for example, Junctions and Accesses, Lay-Bys and Rest Areas, as these develop during the timescale available”.</p> <p>At the corridor level, actual locations of junctions and other ancillary works are not determined and therefore not possible to assess.</p>

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<p>Para 5:</p> <p>The statement that it is expected that ER assessments and recommendations will be informed by the outputs of other strategic studies such as Flood Risk Assessment and Landscape and Visual review is welcomed.</p> <p>We also support the approach that the preparation of the ER is dependent on the recommendations of these studies (section 6) i.e. it will be prepared after these studies are completed.</p> <p>These will form an important part of the assessment process.</p> <p>Please could you explain how the findings of these studies will be integrated into the assessment process.</p> <p>Where these studies have informed the SEA process, we would expect these to be clearly referenced in the ER so that there is a clear audit trail for the assessment.</p> <p>Our comments in relation to the Habitats Regulations Assessment are provided below.</p>	<p>Noted.</p> <p>Whilst the aim is to incorporate recommendations from the SFRA and Landscape Review, the ER will <i>not</i> be prepared after these studies are completed.</p> <p>These studies began during the SEA Scoping Consultation period and will not be complete by the ER publication target date.</p> <p>The Environmental Report has captured key issues/ recommendations where the work is sufficiently advanced.</p> <p>The SEA Post Adoption Statement will capture further recommendations where relevant.</p>
<p>Para 6:</p> <p>This states that the ER will result in a draft set of A9 dualling design/ environmental principles to inform both design guidance and a draft SEA monitoring framework, tailored to specific issues/ recommendations in each study area.</p> <p>Please also see our comments in relation to Appendix D which regularly refers to</p> <p>“SEA will recognise as a high level issue for inclusion in developing design principles/ guides.”</p> <p>However, while we support the production of design and environmental principles as mitigation and enhancement measures, the result of the SEA should be the identification and assessment of significant environmental effects and therefore the best environmental options for the route.</p> <p>We understand there will be an opportunity to discuss these principles and will be pleased to work with you in this process.</p>	<p>Noted.</p> <p>The text on recognising as a high level issue for inclusion in design principles/ guidance generally refers to issues that are important, but not necessarily strategic for the SEA.</p> <p>The aim is to ensure these are included in design principles even though they may not inform strategic assessments.</p> <p>Discussed at the meeting with SNH on the 8-03-13.</p>
<p>Mitigation and enhancement measures</p> <p>In Tables 5.2 and 5.3 we note the commentary in the assessment includes both assessment of effects and mitigation/ enhancement (e.g. question 14, ‘opportunity to incorporate cycling/ footpath/ bridleway provisions in overall dualling project’).</p> <p>We recommend mitigation/ enhancement are presented in a separate column in the assessment matrix.</p> <p>This will show a clear link between any adverse effects identified through the assessment, and the mitigation/ enhancement measures required as the project moves through the entire process.</p> <p>This section should include descriptions of the measures to mitigate significant adverse effects identified by the assessment, explaining the reasons for it and identifying who will implement it and when.</p> <p>Any residual effects should also be identified following mitigation.</p>	<p>Noted.</p> <p>The level of detail required here is not appropriate to strategic comparison of corridor options.</p> <p>This is more appropriate for route alignment, detailed design and project level environmental assessment and mitigation management planning.</p> <p>The ER discusses opportunities for enhancement at a strategic, not site level.</p>

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<p>Appendix E:</p> <p>While we appreciate that this is a preliminary assessment, the scoring and commentary are sometimes unclear.</p> <p>For example in Question 29, lighting is scored both + / - effects.</p> <p>We are uncertain as to the basis for some of the scoring.</p> <p>It would be helpful to list positive effects separately to the negative effects in the commentary.</p> <p>The refinement of the scoring as suggested above will allow for the clearer identification of the range of significance of effects in these cases.</p> <p>We are recommending the assessment questions are revised to provide a more focussed assessment and this should help in updating this table.</p>	<p>Accepted that Q29 may not explain or warrant the +/- score</p> <p>Scoring and assessment questions were discussed at the meeting with SNH on the 8-03-13.</p> <p>Assessment not revised as overall result not expected to change.</p>
<p>We note that for Question 32, option 1 recognises potential positives with interpretation etc. but this isn't recognised for option 2.</p>	<p>However, in this example, Option 2 text states 'as well as those required for online widening'.</p> <p>The negative score aimed to demonstrate that the number/ volume of cuttings would be greater than option 1.</p> <p>The opportunities for interpretation were considered to be the same/ similar to option 1, so was not mentioned in the commentary.</p>
<p>Cumulative, synergistic and secondary effects</p> <p>The intent to consider cumulative effects once the preferred corridor options are determined is noted (Appendix D).</p> <p>However, we recommend cumulative, synergistic and secondary effects with other plans as well as the preferred options are considered as part of the SEA assessment.</p> <p>This should also inform the location of any preferred corridors.</p> <p>We would be pleased to comment on a proposed assessment methodology as to how this will be considered in the ER prior to its commencement.</p> <p>We note the recording of major windfarm development as part of the baseline information, but also suggest other major infrastructure developments such as the BeaulieuDenny powerline and Highland mainline rail route are considered.</p> <p>Mitigation measures to avoid or mitigate significant negative effects should be included.</p>	<p>Noted.</p> <p>The Highland Mainline and Beaulieu Deny Powerline projects are recognised through the Environmental Report and key issues/ cumulative risks are discussed.</p> <p>Current HML and BDL locations are included in constraint maps.</p> <p>The ER states that a more detailed cumulative impacts assessment will be considered before drafting the SEA Post Adoption Statement should further information become available.</p>
<p>We support the SEA assessment being carried out at the same time as the preliminary engineering study, but for clarification, we expect the SEA to be independent of the engineering study in terms of the identification and assessment of significant environmental effects of the route.</p> <p>The SEA should be used to identify the best fit of the route from an environmental perspective.</p> <p>The findings of both these studies can then be brought together in terms of the overall best fit of the route and to ensure environmental considerations are integrated into the plan.</p>	<p>Noted.</p> <p>SEA has provided environmental input to option considerations; however, any options sifted out as not viable on an engineering basis have not been assessed in any detail by the SEA.</p> <p>SEA options consideration has remained independent.</p>

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Monitoring is a requirement of the Act and we request further information on the monitoring programme.	Monitoring proposals are discussed in the Environmental Report, and will be revised/ finalised prior to drafting the SEA Post Adoption Statement.
<p>Habitats Regulations Appraisal</p> <p>We welcome the HRA screening assessment running parallel with SEA scoping (para 2.7), and the intent to incorporate its recommendations in the SEA assessment.</p> <p>The ER should make clear the outcome of the Habitat Regulations Appraisal process regarding impacts on European sites, rather than the first stage of screening for likely significant effects as stated in para 2.7.</p> <p>The approaches and links between the SEA and HRA processes should be fully explained.</p> <p>When the HRA is undertaken in parallel with SEA it is important that the findings of both appraisals are separately documented and the HRA uses the right terminology</p>	<p>Noted.</p> <p>The SEA makes reference to the HRA Screening and the need for strategic programme level Appropriate Assessment (AA). The AA will be completed, in consultation with SNH, during the ER public consultation period to ensure recommendations are captured prior to drafting the SEA Post Adoption Statement.</p>
Historic Scotland	
<p><u>General comments</u></p> <p>Overall, I found the SEA scoping report to be very well presented with a clear approach to the assessment which was easy to follow.</p> <p>However, I have made some comments on the detail of the SEA framework set out in the scoping report which, if adopted, will improve the clarity of the assessment for our interests.</p> <p>On the whole, the Scoping Report provides a clear outline of the approach to the environmental assessment of the plan, and subject to the comments set out below and in the attached Annex, I am content with the level of detail proposed for the environmental assessment.</p> <p>I welcome the inclusion of the historic environment within the scope of the assessment.</p>	Comments noted and welcomed.
<p><u>Relationship with other Plans, Programmes and Strategies (PPS)</u></p> <p>I consider that Appendix A sets out the relevant PPS for the historic environment as they currently stand.</p> <p>However, as you may be aware historic environment policy in Scotland is currently under review.</p> <p>Whilst the review process will be unlikely to have concluded before the expected completion date of the SEA Environmental Report (ER), the findings of the review will be implemented during the lifetime of the project.</p> <p>I recommend that you highlight that there will be a need to keep sight of the progress of the review in the ER as this may have some implications for the project level environmental assessments that will be undertaken.</p>	<p>Section 5 of the ER makes specific reference to the need to track the outcomes of the historic environment policy review, as recommended by Historic Scotland, and as more detailed project level design and environmental assessments progress.</p> <p>Also included in recommendations and monitoring framework.</p>
<p><u>Environmental baseline</u></p> <p>We welcome the GIS based approach taken to mapping the environmental baseline.</p> <p>However, I note that Inventory gardens and designed landscapes (GDL) appear on both the maps for cultural heritage designations and landscape designations.</p>	<p>Noted.</p> <p>Inventory Gardens and Designed Landscapes were shown on both GIS maps at Scoping stage as they were considered to crossover between SEA topics for this assessment</p>

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<p>The rationale behind this is unclear and it would be helpful if this was explained in the ER.</p> <p>Simply for information, GDL are designated and managed through the planning process solely by Historic Scotland.</p>	<p>(Landscape and Cultural Heritage/ Historic Environment).</p> <p>GDL has been reassigned to Historic Environment mapping only.</p>
<p>It may be helpful to show the presence of unscheduled archaeology on the GIS maps to be presented as the baseline for the scheme in the ER.</p> <p>This will inform the strategic approach to mitigating impacts on those sites and may also help with formulating alternative route options.</p> <p>Information on the location and extent of such sites should be obtained from the relevant planning authority archaeologists.</p> <p>Contact details for those services along the length of the route are available on the Archaeology Scotland website.</p>	<p>Unscheduled archaeology (local authority Historic Environment Records) has been added to the A9 dualling GIS databank; however, the information has not been assessed in the SEA.</p> <p>It is considered more appropriate to inform later route alignment studies within corridors.</p>
<p><u>Proposed scope of the SEA</u></p> <p>I welcome the inclusion of the historic environment within the scope of the assessment.</p> <p>However, the dataset for Inventory gardens and designed landscapes is missing from table 4.3.</p> <p>I recommend that datasets for Local Authority Sites and Monuments Records/ Historic Environment Records are added to this list.</p>	<p>Noted.</p> <p>Local authorities have been contacted to obtain GIS shape files.</p>
<p>I note the identification of SEA topic interactions in Appendix D.</p> <p>However, it should be noted that there may be more interactions than highlighted in the scoping report and that this may have implications for any mitigation measures that may be identified.</p> <p>Section 4 of the most recent draft (dated October 2012) of Volume 10 section 5 of the Design Manual for Roads and Bridges (DMRB) explains how other topics relevant to this SEA may interact with the historic environment.</p> <p>Consideration of these issues in the ER would be beneficial.</p>	<p>The Environmental Report states an overarching position that later phases of A9 design/ route alignment selection/ environmental assessment will be considered in full compliance with DRMB, including the relevant update noted.</p> <p>The comparison of route corridors detailed in the Environmental Report focused more simply on historic environment constraint features.</p>
<p><u>SEA assessment framework</u></p> <p>The SEA scoping issues set out on page 27 provides a good starting point for the assessment of the strategic issues the dualling of the A9 is likely to raise for the historic environment.</p> <p>However, given the range of issues to be considered as outlined for the historic environment and landscape in Appendix D, I recommend landscape and the historic environment are dealt with as separate topics as this will bring greater clarity to the assessment.</p> <p>I welcome the clarification given in Appendix D that high level consideration will be given to the effect of the project on undesignated archaeology.</p> <p>As noted above it will be helpful to include these assets on the baseline mapping.</p>	<p>Noted</p> <p>Landscape and Historic Environment has been considered separately in the ER.</p> <p>Appendix D of the Scoping Report stated that the SEA would <i>not</i> consider archaeology, other than “<i>high level consideration only to highlight principles of managing construction and unrecorded archaeology</i>”.</p> <p>SEA includes draft strategic principles which include reference to archaeology; however, there is no assessment of the effect of the project.</p>

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<p>A significant omission from the list of SEA questions for the historic environment is one which will allow for the consideration of direct impacts on heritage assets.</p> <p>On this basis, it will be beneficial to expand the SEA questions listed in para 4.3.4 for the historic environment to include issues such as whether dualling/ route corridor options would</p> <ol style="list-style-type: none"> 1) directly affect the site of a heritage asset and/ or 2) affect the setting of a heritage asset. <p>The inclusion of the second question as a separate issue will allow you to consider the potential for positive and/ or negative effects.</p> <p>For example, whilst some of the options currently being considered in the vicinity of the A listed Dunkeld station could bring the line of the road closer to the building, the option to lower the level of the road may lead to, amongst other things, a beneficial impact on both the long term viability of the station building (direct impact) and improvements to its setting by reconnecting the station with the town (effect on setting).</p> <p>This, together with the separation of the landscape and historic environment topics will help to bring greater clarity to the assessment framework.</p>	<p>Noted.</p> <p>Section 5 of the ER refers to direct effects and effects on setting as separate issues.</p> <p>The SEA does not consider site level mitigation, as it is limited to comparing corridor options on the basis of which might present more or fewer issues/ risks.</p> <p>Options around Dunkeld station require more detailed studies than the SEA provides, although the particular issues noted are being considered via a specific A9 scheme.</p>
<p>I note the range of issues to be considered as set out in Appendix D.</p> <p>It may be beneficial to include the topic of temporary features associated with the construction phase such as works compounds and laydown areas should be included in the range of issues identified here.</p>	<p>Appendix D made reference to site compounds; however, this issue has been discussed, and Transport Scotland do not and cannot control the location of temporary works sites.</p> <p>This is up to the construction contractor to negotiate with local land owners, and Transport Scotland do not buy the land.</p>
<p>The inclusion of worked examples in Appendix E is welcomed.</p> <p>However, I found the scoring of the assessment as described in the key lacked clarity.</p> <p>For example, as noted in Appendix C there are a large number of scheduled monuments within 1km of the existing A9.</p> <p>It is not clear how the conclusion reached in response to the assessment question posed in row 23 for option 1 has been arrived at.</p> <p>It will be helpful if the questions were reworked and the commentary expanded on these issues.</p>	<p>Q23 referred to potential effects on the setting of designated features and, when compared with the other 2 strategic alternatives, Option1 was considered as presenting the lowest level of change beyond existing conditions.</p> <p>Option1 was assessed as '+/-' mixed; however, it is recognised that it could have been assessed as negative.</p> <p>The Scoping stage assessment is not revisited in the ER.</p>
<p><u>Mitigation</u></p> <p>Consideration of the wider range of topic interactions in the assessment will help you to identify appropriate mitigation measures and to consider the effects of those measures across the range of environmental issues included in the scope of the SEA.</p>	<p>SEA is limited to comparison of corridor options, and flexibility on route alignments within corridors, informed by local survey and more detailed environmental assessment are considered appropriate strategic mitigation.</p>

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SEPA	
<p>General comments</p> <p>Generally, the scoping report is very thorough and contains most of the elements that SEPA would normally wish to see addressed at this stage.</p> <p>We are generally content with the scope and level of detail proposed for the ER.</p> <p>As explained at the meeting, there are a few detailed issues that you may wish to consider which are set out below.</p>	<p>Comment noted and welcomed.</p>
<p>1. Relationship with other Plans, Policies and Strategies (PPS)</p> <p>1.1 The list of PPS in Appendix A provides a good review of relevant plans, programmes and strategies.</p> <p>In particular we welcome the statement to avoid flood risk and consider mitigation where unavoidable.</p> <p>Avoiding flood risk is the first principle of sustainable flood risk management and we welcome that as a guiding principle, though appreciate that it is not always possible, particularly given that sections of the existing A9 route are within high risk areas.</p>	<p>Noted.</p> <p>The ER includes the principle of avoidance of increased flood risk, and mitigation in unavoidable areas.</p>
<p>1.2 We consider that the review is very thorough and includes the relevant plans, programmes and strategies for the SEA topics within our remit.</p> <p>You may also wish to refer to The Waste Management Licensing (Scotland) Regulations 2011 under soil as it has implications for the re-use of peat and soils.</p> <p>Any peat and soil re-use proposals will need to be for ecological benefit otherwise they will needed to be licensed under WML.</p> <p>The only other omission we would note is Highland Council's Construction Environmental Management Process for Large Scale Projects.</p> <p>However this may have been missing off their website at the time of writing the Scoping Report.</p>	<p>Noted.</p> <p>The PPS review has been updated to include The Waste Management Licensing (Scotland) Regulations 2011.</p>
<p>2. Environmental Baseline</p> <p>2.1 Page 21 of the scoping report and Appendix C provides good specific baseline data for those aspects of the environment where we have an interest.</p> <p>We support the clear way in which data is presented making use of GIS, maps and diagrams.</p> <p>For your information there is a historic landfill at Dunkeld, Ladwell within 1km of the existing A9 junction with the A822.</p> <p>You may need to check this with the Perth and Kinross Council.</p>	<p>Noted.</p> <p>This historic landfill location has not been added to the GIS databank.</p> <p>SEA reviewed closed landfill data on the Scotland's Environment website and did not identify this site.</p> <p>If still considered necessary, further mapping information will be confirmed with Perth and Kinross Council prior to drafting the SEA Post Adoption Statement.</p>
<p>2.2 We note that you are still awaiting wetlands information.</p> <p>We understand there was an error with the previous wetland inventory we sent so we have sent you the information again.</p>	<p>Wetlands inventory information gratefully received and added to GIS databank.</p>

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<p>2.3 We also note that you are awaiting peat information. We do not hold any data on peat areas but would suggest you might want to contact The James Hutton Institute who may hold data on peat coverage. The Soil Survey of Scotland 1:250 000 maps provide information on soils for the Programme area. This and other information on Scottish soils should be available from them. In addition the LandSat2007 satellite data is freely available and maybe a useful source of data. It categorises land type into categories such as forestry, urbanised and arable. This could help you usefully screen possible routes against the land which has already been disturbed compared with ecologically sensitive habitats. Obviously options which utilised brownfield land or land already disturbed would be scored more positively compared with routes which would disturb areas not previously developed.</p>	<p>JHI soils data gratefully received and added to GIS databank. Other sources of data reviewed but not included in SEA mapping. If still considered necessary to inform route alignment studies within corridors, additional information can be added to the GIS databank.</p>
<p>2.4 This would also help you to assess what further detailed assessments need to be undertaken at the Environmental Impact Assessment (EIA) stage. For your information at the EIA stage, we will usually expect a Phase 1 habitat survey for 100m either side of the chosen route to assess any potential impacts on wetlands. However where existing roads, housing or other types of development are within 100m of the chosen route then you would only have to survey up to the built development envelope as it will act as a buffer between the new road and any wetland areas. Please note that where wetlands are identified through the Phase 1 habitat survey that we will then expect a more detailed National Vegetation Classification to be undertaken in accordance with Appendix 2 (which is also applicable to other types of developments) of our Planning guidance on windfarm developments to identify if wetlands are groundwater dependent terrestrial ecosystems. You may wish to note this in your tables setting out further work to be undertaken but we will also provide more advice on this at the EIA stage.</p>	<p>Noted. Information will be passed on for later, more detailed environmental assessment stages.</p>
<p>2.5 We welcome the consideration through the Preliminary Engineering work, as detailed on page 17 of the scoping report, of the existing contours and need for cuttings. This could provide very useful data in terms of the likely disturbance of soil resources if it is available within the timescales of the SEA.</p>	<p>The A9 PES team have conducted a separate geotechnical desk based review to inform the engineering assessments.</p>

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<p>2.6 The Indicative River & Coastal Flood Map (Scotland) is listed as we would expect, and we agree this is probably the most useful tool for this level of assessment.</p> <p>We welcome the intention to carry out a Strategic Flood Risk Assessment (SFRA).</p> <p>Our Strategic Flood Risk Assessment – SEPA technical to support Development Planning contains guidance relevant to this project.</p> <p>In addition Section 3 of SEPA's Technical Flood Risk Guidance for Stakeholders provides guidance on how to do this with section 3.2 providing a range of relevant information sources for investigation including the Indicative River and Coastal Flood Map (Scotland).</p> <p>The Flood Map provides an indication of the 1 in 200-year (0.5% annual probability) return period flood extent for both riverine and coastal flooding and provides a useful overview of flood risk for the area.</p> <p>This information could be supported and complemented by other easily derived or readily available information in relation to flood risk from SEPA Local Authorities, for example information on historical flood events or the impact of flood alleviation schemes.</p> <p>We also hold some historic flood information and river levels which can be request from Science.Advice@epa.org.uk.</p> <p>Part of the SFRA could also be the identification of priority areas for more detailed analysis in the future.</p> <p>During the SFRA work you may wish to make contact with the new Local Plan District Partnerships formed under The Flood Risk Management (Scotland) Act 2009 to produce Flood Risk Management Plans.</p> <p>They may hold other information or benefit from the work you are undertaking.</p>	<p>Noted.</p> <p>This information has been passed to the SFRA team and further consultation with SEPA and other key stakeholders is underway.</p> <p>SFRA outputs and recommendations will be captured prior to drafting the SEA Post Adoption Statement.</p>
<p>2.7 In terms of waterbody classification you may also wish to take into account the River Basin Management Planning process in the preparation of the plan.</p> <p>The River Basin Management Plan (RBMP) for the Scotland River Basin District and the draft Area Management Plans describe environmental objectives for each waterbody to protect and improve the water environment and a Programme of Measures to progress towards achieving these environmental objectives.</p> <p>The draft plans can be viewed on our website at: www.sepa.org.uk/water/river_basin_planning/early_basin_planning_work.aspx.</p> <p>These will be important where watercourse crossings are proposed and where the RBMP has proposals to improve the status of the waterbody.</p> <p>Please note that the waterbody data on our website is the 2008 data and more up to date data is available from foi@sepa.org.uk.</p>	<p>Watercourse data gratefully received and added to GIS databank.</p> <p>The SEA has not considered specific site level issues for watercourse crossings, keeping to a higher level discussion of the range of issues to be considered at more detailed design stages.</p>
<p>2.8 We note that the constraints mapping does not show any waterbody data.</p> <p>We presume this is just an omission and that the GIS used in this assessment will contain all relevant data and clearly highlight where waterbodies exist.</p>	<p>GIS mapping includes OS base maps which identifies names of watercourses and waterbodies.</p> <p>Watercourse data received did not include names or status.</p>

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<p>2.9 It is not related to our remit, but we note that the Development Sites for Cairngorm National Park are not listed although Highland and Perth and Kinross are.</p>	<p>GIS information received from Perth and Kinross and Cairngorms National Park was added to the GIS databank. Highland Council development site data is a data gap at this time.</p>
<p>3. Proposed Scope of SEA</p> <p>3.1 We support the use of SEA to consider the different environmental effects of the alternatives of online, online and some offline or an alternative route options. We welcome the approach of using the two overarching questions on Page 27 of the scoping report to determine which SEA issues to scope in. We agree with the scoping results in Appendix D and welcome the way the tables clearly highlight where further detailed assessment will be required. This helps identify information gaps and sets clear roles between the SEA and Environmental Assessment and Design Manual for Roads and Bridges (DMRB) guidance requirements.</p>	<p>Noted.</p>
<p>3.2 Page 35 of the scoping report suggests that air quality will be scoped out entirely whereas Appendix D page 11 suggests that 'Air' as a topic will be considered under 'Population and Human Health' but does not detail how this would be implemented in practice. As suggested in our response PCS/123089 "we would recommend that if any high level assessment of alternative routes is being carried out that such assessments include air quality". Perhaps under the topic 'Population and Human Health' this could include air quality in terms of whether if an off-line route is chosen this is likely to have positive or negative impacts. For example if the current route is adjacent to a settlement then by moving the route away from the settlement this could have a positive impact upon air quality.</p>	<p>Noted. 'Air' has been scoped out following discussion with SEPA; however, emissions to air are discussed in Section 5 of the ER. The ER states that more detailed air quality assessment will be required to inform route alignment studies, in accordance with DMRB guidance.</p>
<p>3.3 We would support 'Climatic Factors' being scoped out provided it is embedded within the other topics as described in Table 4.6 on page 35 of the scoping report. For example climate change is an integral aspect of the consideration of overall flood risk.</p>	<p>Climatic factors have been scoped out; however, related issues are discussed through the Material Assets and Water sections.</p>
<p>4. SEA Assessment Framework</p> <p>4.1 We consider the proposed SEA assessment questions presented in Section 4.3 of the scoping report and Appendix D provide a good assessment of issues within our remit.</p>	<p>Noted.</p>

A9 Dualling SEA Scoping Report – Statutory Consultee Feedback	SEA Comment
<p>4.2 The use of a worked example was helpful.</p> <p>Section 5.3 of the scoping report appears to indicate that the various route options for each of the seven study areas will be subject to the SEA questions however Paragraph 1 of Section 5.3 also talks about limiting the assessment.</p> <p>This is a bit confusing as it is unclear exactly what level of assessment each route option will be subject to.</p> <p>Our preference would be that each route option for each of the seven study areas is subject to the SEA questions as this should highlight the differences in terms of significant environmental effects between the route options.</p>	<p>Corridor options that passed an initial sifting exercise on engineering issues and whether or not they meet the A9 programme objectives have been assessed in the SEA.</p> <p>Assessments of sifted corridor options focus on the key issues and constraints within each corridor option.</p>
<p>4.3 It is noted that evidence-based expert judgement will inform the assessment as well as other type of analysis including the use of GIS.</p> <p>We are generally content with the proposed detailed assessment matrix and particularly welcome the use of a commentary box to fully explain the rationale behind the assessment results.</p>	<p>Noted.</p>
<p>4.4 Some of questions use terminology such as limit, minimise and maintain.</p> <p>For many of issues, and given the purpose of the SEA in terms of comparing route options, it would be best if term avoidance was used as this provides a bench mark to compare different route options i.e. option 1 is within a flood plain versus option 2 that avoids the flood plain.</p> <p>In order to assist we suggest the following changes to the assessment questions (these are numbered as per the scoping report):</p>	<p>Noted and discussed with SEPA in the period following receipt of the Scoping Report response.</p> <p>It was agreed that the assessment questions were appropriate for the strategic alternative assessment undertaken at the Scoping stage, however an 'issue' based assessment would be undertaken for each corridor option.</p>
<p>a) Question 8 –</p> <p>It is unclear if this question refers to waste in terms of soils and peat or whether it is referring to the re-use of existing roadways thus limiting the need for additional raw materials in terms of tarmac or other infrastructure.</p> <p>It would be good to narrow this question down to make it more meaningful.</p> <p>We would suggest that Questions 32 and 33 may already take into account the generation of waste rock or soils.</p>	<p>Section 5 of the ER now discusses material resources, raw materials and waste separately from potential impacts on soils.</p> <p>Section 5 of the ER discusses issues on watercourse crossings within 100m of the existing road.</p> <p>The SEA does not consider site level options on crossings as this is better considered via later route alignment, detailed design, local survey and environmental assessment stages.</p> <p>In all cases, the 200m wide corridor options considered require new/ modified crossings, will cross peat and wetland areas, and will have some effect on native woodlands.</p> <p>The online corridor option is assessed as least</p>
<p>b) Question 27 –</p> <p>This could usefully be split into several questions,</p> <p>“Will this option be within 100m of a waterbody?”</p> <p>“Will this option require new or modified watercourse crossings?”</p> <p>“Will this option cross an area of previously undisturbed habitat e.g. peatlands or native woodlands?”</p> <p>Question 37 already assesses the number of watercourse crossings so there maybe opportunities to combine these.</p>	
<p>c) Question 28 –</p> <p>We would expect all sections of the route to be served by SUDS.</p>	

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<p>Instead, what would help compare the route options would be a question similar to: “Is there enough space to incorporate two levels of SUDS treatment?” In most cases the answer would be yes however this would highlight any pinch points along the route. This question may also duplicate Question 38 somewhat so perhaps the two can be combined?</p>	<p>likely to affect previously undisturbed areas.</p> <p>Pinch points along the route have been identified through the discussion in Section 5 of the ER.</p>
<p>d) Question 30 – Best practice pollution prevention measures should insure that non-native invasive species are not spread so this should be standard along the route. A more useful question may be: “Is the route within 100m of any known areas of NNIS?” However it is unclear how readily available this information would be without doing site surveys so this may not be appropriate at this level. Alternatively waterbodies and the importation of soils can often be the cause of the spread of invasive species and therefore questions such as the above “Will this option be within 100m of a waterbody” or “Will this option require significant importation of materials?” may flag up where risks lie.</p>	<p>Other potential SUDS related issues have also been discussed, including landscape, ecological, water discharge quality and the level of treatment required for discharge into Special Areas of Conservation.</p> <p>INNS (invasive non native species) were discounted from consideration at the SEA level as no local surveys are being undertaken. More appropriate at later route alignment/ detailed design stages.</p> <p>All corridor options are within 100m of watercourses at some points, all will require significant importation of materials, therefore a route wide strategic principle on INNS issues is considered more effective.</p>
<p>e) Question 33 – This should be modified to “Avoid excavation/ construction on peat/ high carbon soils?” as this would help compare the route options more directly.</p>	<p>The A9 north of Glen Garry (Section C) cannot avoid excavation/ construction on peat soils in some areas (none identified south).</p>
<p>f) Question 34 – This could be more specific by changing to “Is the route within 100m of peat or wetland areas?” as again we would expect all options to minimise significant adverse impacts. By putting a distance in, it will help flag up where potential problem areas could be. Based on our comments on baseline data in Sections 2.3 and 2.4 above you may wish to re-phrase this question further depending on the level of data and categories of land types currently available. Again this appears to duplicate Question 39 so the two may be combined.</p>	<p>Section 5 of the ER provides data on peat and wetland areas with distances from the current A9, highlighting key areas of risk of these important soils and habitats.</p>

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<p>g) Question 40 – We expect water quality to be maintained or improved in line with the Water Framework Directive (WFD). Perhaps a more useful question would be “Is the proposal within 100m of any private or public water supplies?” This data is readily available from us and local authorities. Our comments in (b) above also make reference to general impact upon waterbodies. It is important to remember than morphological impacts are just as important as water quality in terms of the classification of waterbodies under WFD.</p>	<p>Discussed with SEPA, not so relevant for corridor options, more relevant for route alignment studies, so not considered further in the SEA.</p> <p>In general, water quality along the A9 is not expected to be detrimentally affected, accepting construction stage risks and pollution control measures are required.</p>
<p>h) Question 41 – If our comments above are implemented then it is unlikely this question would be needed as again we expect there to be no pollution to the water environment.</p>	<p>Long term water quality may see cumulative benefits due to SUDS attenuation of road surface run off.</p>
<p>i) Question 43 – By using the Indicative River & Coastal Flood Map (Scotland) this question could be better phrased as “Does the route cross a flood plain?” In addition flood risk from smaller waterbodies not mapped on the Indicative River & Coastal Flood Map (Scotland) could be captured by Questions 37 and our suggestion in (b) above.</p>	<p>Noted and taken into consideration in the ongoing Strategic Flood Risk Assessment (SFRA).</p> <p>SFRA findings and recommendations will be captured prior to drafting the SEA Post Adoption Statement.</p>
<p>j) In addition to assessing the main route options Section 5.3 talks about the ancillary works. Whilst we recognise the full extent of ancillary works will not be available at this time it maybe useful to have questions such as “How many junctions would be closed and thus how many additional roads are likely to be required?” The footprint of these ancillary works could be significant so by comparing the likely number it may give a better idea of which option would have the biggest ancillary works footprint.</p>	<p>Discussed with SEPA, not possible to assess at this time.</p> <p>SEA will review the emerging Junction Strategy prior to drafting the SEA Post Adoption Statement.</p>
<p>k) The Scoping Report refers to some other nearby projects such as the Beaully Denny power line or windfarms. It would be useful to get an idea how the ER will take the cumulative impact of the projects alongside the A9 into account. We appreciate that the decision has already been taken to dual the A9 but perhaps a question similar to “Is the route within 1km of proposed construction project or a project currently being built?” This would enable areas where the cumulative impact could be significant and require some form of mitigation to be flagged up.</p>	<p>Section 5 of the ER discusses wind farms, Beaully Denny and the Highland Mainline, recognising key areas of concerns and stating that a more detailed cumulative impacts assessment will be completed prior to the SEA Post Adoption Statement should further information become available.</p>
<p>4.5 Page 9 of the scoping report suggest that for peat soils, wetlands and flood risk suggests that SEA may be limited to signposting to good practice. We consider that there should be enough baseline data upon which to ascertain whether there is a risk of significant environmental effect for these topics.</p>	<p>Noted.</p> <p>Soils and wetlands data has been obtained and GIS maps identify areas of peat, wetland, flood risk to support assessments for each corridor</p>

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<p>Our comments in section 2 above may assist in this but we would happy to provide comments on any draft assessments if this would be of help.</p> <p>For example in terms of flood risk, where potential route options are being assessed the SFRA, Indicative River and Coastal Flood Map (Scotland) and other available information should enable you to screen the options and ascertain where flood risk could be an issue.</p>	option.
<p>4.6 This work needs to be done at this early stage to help inform the route selection process rather than being done after the preferred route is selected.</p> <p>The above suggested questions would help you make meaningful comparisons between the route options.</p>	Important to distinguish that SEA is looking at corridor options (ie. issues within 200m wide corridors), which will be followed by more detailed route alignment studies within the corridors.
<p>4.7 In terms of assessing impacts upon waterbodies and the number of watercourse crossings the Water Framework Directive requires the protection of the whole water environment not just designated sites.</p> <p>Section 4.3.7 on page 32 appears to indicate that only impacts upon designated watercourses would be considered.</p> <p>The SEA should consider impacts and numbers of watercourse crossings upon all watercourses, loch and groundwater dependant terrestrial ecosystems.</p> <p>We feel the SEA questions should enable this to be undertaken.</p>	<p>Noted.</p> <p>Watercourse data received and included information on GIS maps.</p> <p>Site level issues not considered in SEA.</p>
<p>4.8 Page 3 of Appendix D suggests that all permeable paving and under drained swales provide two levels of treatment.</p> <p>It should be noted that this is only the case if they are constructed in a specific way.</p> <p>CIRIA C697 manual entitled The SUDS Manual provides further detail on this.</p>	Noted.
<p>4.9 We would encourage you to use the assessment as a way to improve the environmental performance of individual aspects of the final option.</p> <p>For example it is good the way you are using the SEA to identify the need for further assessments or guidelines.</p> <p>Where mitigation is proposed this should be included within the SEA assessment so that it can be taken forward into the more detailed Environmental Assessment at a later stage.</p> <p>It may be good to have a column to the right entitled 'Mitigation/ further assessments required' and within this state what mitigation or assessments may be needed to address the impact.</p> <p>A further column to the right of this could then re-score the option against the question taking into account the mitigation and thus giving a fairer assessment.</p>	<p>The Environmental Report includes discussion of constraints, risks, impacts, strategic mitigation and opportunities.</p> <p>The SEA Post Adoption Statement will provide the final link with recommendations for more detailed environmental assessment within each preferred corridor.</p>
<p>4.10 In particular we welcome the idea of an A9 Design Guide as mentioned on pages 15 and 39 of the scoping report.</p> <p>We believe that if there is a clear central document which sets out standard mitigation requirements then this should enable good design and construction methodology to be implemented.</p>	Noted.



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