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# Environmental Impact Assessment Record of Determination

## A9 Dalnaspidal Single to Dual Transition (Drumochter) – Resurfacing

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# Project Details

## Description

BEAR Scotland has been commissioned by Transport Scotland to undertake resurfacing works on a 187m section of the A9 trunk road. Carriageway resurfacing will involve the milling out and replacing of bituminous material. Following the resurfacing works, road markings and studs will be reinstated. Additionally, works will include filter drain recycling, gully clearance and cleaning, culvert clearance to remove weed growth, and replacement of missing or damaged verge marker posts and snow poles.

Main plant will include pavers, planers, excavators, and rollers. Heavy goods vehicles (HGVs) will be required for transport of materials and wastes.

The package of works will include:

- Set up traffic management (TM) and mark out site.
- Mill out old surface course.
- Lay new surface course.
- Roll surface and allow it to go off.
- Install road markings and studs
- Remove TM and open road.

Additional works as described above will be conducted simultaneously.

The scheme is currently programmed for delivery within the 2026-2027 financial year, with an approximate start date of 01/12/2026, over a duration of six nights and night-time working pattern (19:00 – 06:00). Changes in the programme may result in a change to the proposed working hours/commencement dates.

Traffic Management (TM) for the scheme will consist of three-way temporary traffic lights with convoy.

The TM strategy will be in line with recommendations and guidance in The Traffic Signs Manual Chapter 8 (Traffic signs manual chapter 8). Access to junction and private roads will be maintained. Site access and plant storage will be located within TM. If the programme changes, this may result in amendment to the exact TM requirements.

# Location

The scheme is located on a stretch of the A9 trunk road approximately 15km southeast from the village of Dalwhinnie, located within Perth & Kinross Council (Figure 1) region. The scheme extent has the following National Grid Reference (NGR) points:

- Start: NN 64646 73277
- End: NN 64495 73388

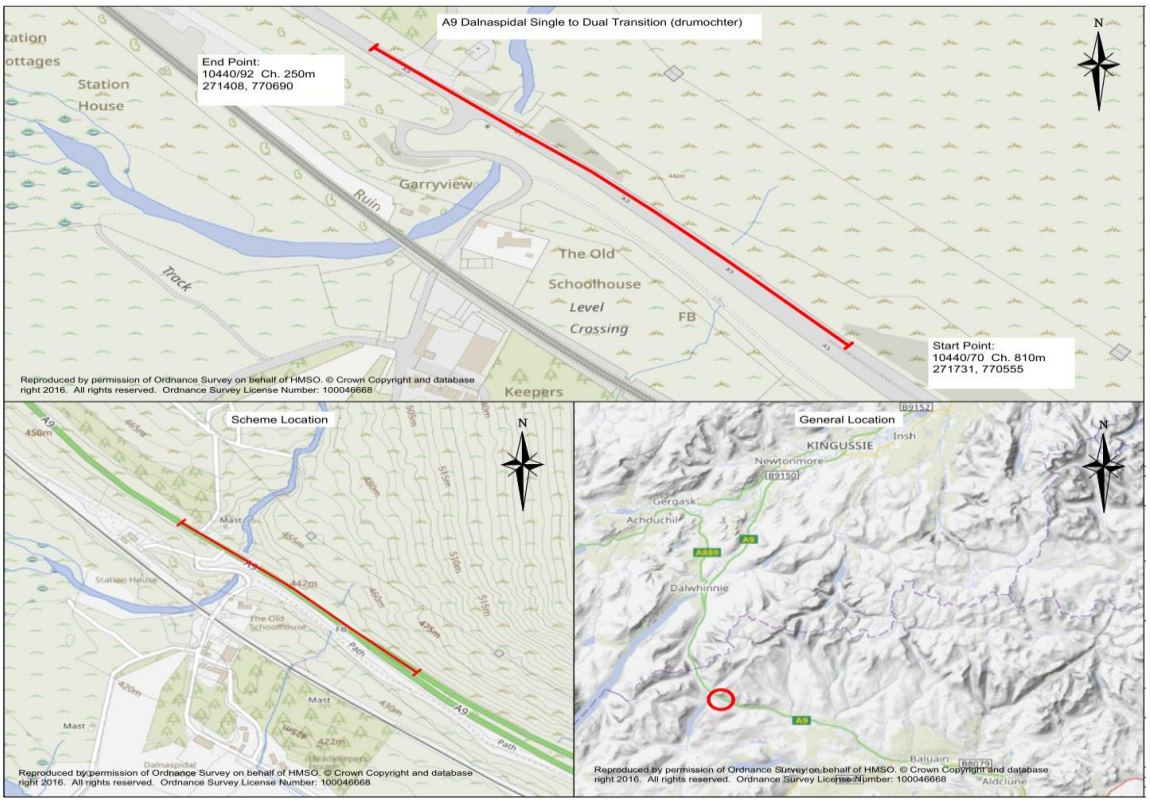


Figure 1. A9 Dalnaspidal Single to Dual Transition (Drumochter) scheme location.

# Description of local environment

## Air quality

There are no Air Quality Management Areas (AQMA) which have been declared by the Perth & Kinross Council within 10km of the scheme (Air Quality Management Areas).

There are no air quality monitoring sites located within 10km of the scheme (Scottish Air Quality).

There are no air pollutant release sites listed on the Scottish Pollutant Release Inventory (SPRI) within 10km of the scheme (Scottish Pollution Release Inventory).

Baseline air quality in the study area is mainly influenced by vehicles travelling along the A9 trunk road and trains on the nearby railway line. Secondary sources are derived from land management within the surrounding area.

## Cultural heritage

There are no designated features for cultural heritage such as Listed Buildings, Scheduled Monuments, Garden & Designed Landscapes, Conservation Areas, Battlefields or World Heritage Sites found within 300m of the scheme extent (Pastmap).

Several records of lesser cultural heritage importance are noted on the National Records of the Historic Environment (NRHE) and Historic Environment Record (HER) databases within 300m of the schemes. The closest noted on both the NRHE and HER databases is Dalnaspidal Bridge (Ref: 161391 / MPK10790), which lies approximately 20m south from the scheme.

As the works are restricted to engineered ground within the A9 trunk road boundary and there are no cultural heritage features of licensable nature within proximity of the proposed works, the potential for the presence of unknown archaeological remains in the study area has been assessed to be negligible. This receptor is not considered further in this Record of Determination (RoD).

## Landscape and visual effects

The scheme falls within Cairngorms National Park (NatureScot Site code: 8623) which is designated for the following special general qualities:

- 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 scheme does not fall within a National Scenic Area (NSA) (SiteLink).

The Landscape Character Type (LCT) within the scheme extent is recorded as 'Upland Glen - Cairngorms' (LCT 126), which has the following key characteristics:

LCT 126 - Upland Glen - Cairngorms

- *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 and 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.*

Land use (HLA Map) within 300m of the scheme extent is classified as rough grazing, plantation woodland, rectilinear fields and farms and motorway and major roads (A9).

The A9 carriageway is a prominent linear landscape feature. The road corridor, for example, has a distinct character shaped by fast-flowing traffic, road markings, safety barriers, signage, landscaping, etc. The scale of the carriageway detracts from the quality and character of the wider landscape. Highland Main railway line is also a prominent linear landscape feature cutting through the landscape.

The A9 Trunk Road, within the North West Network Management Contract (NMC), 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.

# Biodiversity

The scheme lies approximately 50m southwest from Drumochter Hills Special Area of Conservation (SAC) (NatureScot site code: 8243).

Drumochter Hills SAC overlaps Drumochter Hills Special Protection Area (SPA) (NatureScot site code: 8491) which also lies approximately 50m from scheme extents.

Due to the ecological connectivity to the SAC and SPA, a Habitats Regulations Appraisal (HRA) has been undertaken to assess the potential effects of the works on the qualifying features of the site. Please refer to the Biodiversity Impacts and Mitigation section below for conclusion of the HRA.

Drumochter Hills Site of Special Scientific Interest (SSSI) (NatureScot site code: 541) lies within the scheme extent. Additional geological features are detailed in the Geology and Soils section below. NatureScot has been consulted regarding SSSI consent to permit the proposed works (details of this can be found in the assessment section below) due to the following Operations Requiring Consent (ORC) for Drumochter Hills SSSI which relate to the scheme (but are not limited to):

- Operation 13a: Drainage (including moor gripping and the use of mole, tile, tunnel, or artificial drains).
- Operation No. 21: Construction, removal or destruction of tracks, walls, fences, hardstands, banks, ditches or other earthworks, or the laying, maintenance or removal of pipelines and cables, above or below ground.
- Operation No. 22: Storage of materials.
- Operation No 23: Erection of permanent or temporary structures, or the undertaking of engineering works, including drilling.
- Operation No 26: Use of vehicles or craft likely to damage or disturb botanical or ornithological interest.

No other locally or nationally designated sites with biodiversity features (such as Local Nature Reserves (LNR) or National Nature Reserves (NNR)) are located within 300m of the scheme (SiteLink).

A search of the National Biodiversity Network Atlas (NBN Atlas) within 2km of the scheme during the last ten-year period returned no records of protected species. Only records with attributions CC-BY, OGL and CC0 (open use) were included in the search criteria. However, numerous bird species were recorded on NBN within 2km over a ten-year period. Under the Wildlife and Countryside Act 1981 (as amended), all wild birds and their active nests are protected.

The NBN Atlas holds no records of invasive or injurious plant species (as listed in the NMC) within 300m of the scheme, using the same search criteria as above.

A search of Transport Scotland's Asset Management Performance System (AMPS) returned no records of invasive or injurious plant species (as listed in the NMC) within 300m of the scheme.

Habitats surrounding the A9 carriageway are dominated by rough grassland and heather moorland. Pockets of plantation woodlands of densely planted coniferous tree species are also present, providing habitat suitable for nesting birds within the breeding season (March-August inclusive).

There are no areas of ancient woodland within 300m of the scheme (Ancient Woodland Inventory).

There are no Tree Preservation Orders (TPOs) present within 300m of the scheme (Perth & Kinross Council).

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

The scheme lies within Drumochter Hills SSSI (541), which is designated for Fluvial Geomorphology of Scotland earth sciences (biodiversity features are detailed in the biodiversity section above). The SSSI is overlapped in part by Allt Dubhaig Geological Conservation Review Site (GCRS) (SiteLink) which lies approximately 100m southwest (beyond railway line) from the scheme.

Bedrock geology (BGS Geology Viewer) within the scheme consists of:

- Gaick psammite formation – psammite. These rocks were sedimentary in origin, possibly shallow marine (siliciclastic units), but have subsequently undergone metamorphism.

Superficial deposits (BGS Geology Viewer) within the scheme consists of:

- Hummocky (moundy) glacial deposits – diamicton, sand and gravel.
- Alluvium – clay, silt, sand and gravel.
- Till and morainic deposits (undifferentiated) – diamicton, sand and gravel.

Soils (Scotland's Soils) within the scheme are recorded as peaty gleyed podzols with dystrophic semi-confined peat with peaty gleys.

Soils within the scheme extent are recorded as being of Carbon and Peatland 'Class 3', which is associated with peaty soil with some peat soil and peatland with some heath and 'Class 5', which is associated with peat soil and no peatland vegetation (Carbon and Peatland map).

# Material assets and waste

The proposed works are necessary to resurface the worn carriageway and improve drainage, likely requiring binder inlay, reinstation of road markings, filter drain recycling, gully and culvert clearance, and replacement of verge marker poles and snow poles. Materials used will consist of:

- Asphaltic material
- Bituminous emulsion bond coat
- Milled in road studs
- Thermoplastic road marking paint
- Verge marker poles
- Snow poles

Wastes are anticipated to be removed planings from the surface course, which will be treated in line with the Scottish Environment Protection Agency's (SEPA) Position Statement WAS-G-DEF-07 Low Risk Waste Activity (LRWA) 3 and recycled in line with SEPA Guidance WAS-G-DEF-05 on End-of-Waste for Recycled Aggregates. The Contractor will be responsible for ensuring full compliance with these requirements.

If present, any coal tar contaminated road planings will be classified as a Special Waste. Special waste consignment notes (SWCN) will be obtained from SEPA to allow the movement of the contaminated planings. Coal tar contaminated road planings will be transported by a registered waste carrier to an appropriate waste recovery facility, and SEPA will be notified prior to the Special Waste leaving site.

Waste material following the recycling process will be tested for Waste Acceptance Criteria (WAC) prior to disposal.

Vegetation removed from the culvert inlet/outlet will be taken off-site to a BEAR Scotland depot and disposed of in an appropriate manner.

Old marker posts and snow poles removed will be taken off-site to a BEAR Scotland depot and disposed of in an appropriate manner.

The value of the scheme does not exceed £350,000; therefore, a Site Waste Management Plan (SWMP) is not required.

No site compound is required for these works. Storage of plant and equipment (if required) will be within the Traffic Management (TM).

# Noise and vibration

For residential, community and commercial receptors refer to the 'Population and Human Health' section below.

A search of (Scotland's Noise Map) returned records for noise levels during the night (LNGT) within the A9 and its verges between 55 and 70dB.

The scheme does not fall within a Candidate Noise Management Area (CNMA) as defined by the Transportation Noise Action Plan (TNAP) 2024 – 2028.

Baseline noise levels are likely to be primarily influenced by traffic travelling along the A9 carriageway and trains on the nearby railway line (Highland Main Line). Secondary sources are derived from rural activities associated with land management within the area.

# Population and human health

There are approximately eight properties within 300m of the scheme. The closest property (The Old School House) lies approximately 70m southwest from the scheme. Acoustic and visual screening is present with garden planting of shrubs and small trees. Access to all the properties is via the Dalnaspidal junction from the A9 carriageway within the scheme extent.

The Highland Main (railway) Line lies approximately 100m southwest from the scheme at its closest point.

There are no laybys, bus stops or any other public amenities within 300m of the scheme.

According to Scottish Road Works Online, there are no other works scheduled within 300m of the scheme.

At its closest point, a traffic-free section of the National Cycle Network (NCN) route 7 lies approximately 20m south from the scheme. The same route is also utilised as a core path (path ref: BAST/100) listed on Perth & Kinross Council Core Paths.

The walking route 'Meall na Leitreach, from Dalnaspidal' listed on WalkHighlands lies approximately 70m south from the scheme. The same route is also utilised as a core path (path ref: BAST/50) listed on Perth & Kinross Council Core Paths.

Transport Scotland's manual data counter (Site name: JTC00148) located approximately 7.5km north from the scheme, recorded an annual daily total (ADT) of 10,743 motor vehicles in 2025, of which 16% were Heavy Goods Vehicles (HGVs).

TM will consist of three-way temporary traffic lights with convoy.

# Road drainage and the water environment

'Rannoch' (ID 15069) is a groundwater body, and Drinking Water Protected Area (DWPA), in the Scotland river basin district, which underlies the scheme. It has been awarded an overall status of 'good' in 2024 by Scottish Environmental Protection Agency (SEPA) under the Water Framework Directive 2000/60/EC (WFD) (Water Classification Hub).

There are no classified surface water bodies within 300m of the scheme (Water Classification Hub). However, a small unclassified surface waterbody 'Allt Coire Mhic-sith' is culverted below the A9 carriageway within the scheme extent. Other small unclassified surface waterbodies and/or culverted drainage channels may flow below or within proximity to the scheme.

The scheme falls within an area that has a low likelihood (0.1% chance) of surface water and small watercourse flooding each year (SEPA Flood Maps). The unclassified surface waterbody Allt Coire Mhic-sith culverted below the scheme has a high likelihood (10% chance) of flooding each year but this does not encroach onto the A9 carriageway at the scheme extent.

# Climate

The Climate Change (Scotland) Act 2009 ('The Act'), and its subsequent amendment under the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019, sets the framework for the Scottish Government to address climate change. The Act has an ambitious target to reach Net Zero greenhouse gas emissions by 2045, with any residual emissions balanced by removing carbon dioxide from the atmosphere. This is five years earlier than the rest of the UK due to the greater potential for carbon sequestration in Scotland.

The Act was amended to replace interim targets with carbon budgets. Carbon budgets are legally binding caps on greenhouse gas emissions in Scotland over five-year periods. In line with the Act, the Climate Change Committee (CCC) published advice on the level of Scotland's four carbon budgets, covering the period 2026 to 2045, recommending what the Scottish Government sets its carbon budgets at for annual average levels of emissions. These recommendations are based on an ambitious but credible route to Net Zero for Scotland by 2045.

Emissions reductions from surface transport are the largest contribution to meeting the first two carbon budgets. The pathway for surface transport emission reduction is primarily driven by the uptake of electric vehicles, in addition to measures to enable a shift from car use to public transport and active travel, which all play a role in reducing emissions from fossil fuel cars. Ensuring efficiency of existing transport infrastructure and improving/providing new active travel facilities is therefore important to support these carbon reduction budgets.

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 the above noted legally binding target of net-zero by 2045. 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).

# Policies and plans

This Record of Determination 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. The main sources are likely to be dust generated by cold milling in preparation of carriageway resurfacing, as well as exhaust emissions from ancillary plant and vehicles. As a result, there is potential for dust, particulate matter, and exhaust emissions to be emitted to the atmosphere. However, taking into account the nature and scale of the works and the following mitigation measures, the risk of significant impacts to air quality are considered to be low.

- A water-assisted dust sweeper will sweep the carriageway after dust-generating activities, and waste will be contained and removed from site as soon as is practicable.
- Materials that have a potential to produce dust will be removed from site as soon as possible, and vehicles that remove waste from site will have sheeted covers.
- Ancillary plant and vehicles will have been regularly maintained, paying attention to the integrity of exhaust systems.
- Ancillary plant and vehicles will be switched off when stationary to prevent exhaust emissions (e.g., there will be no idling vehicles).
- Cutting, grinding, and sawing equipment (if required) will be fitted or used in conjunction with suitable dust suppression techniques e.g., local exhaust ventilation system that fits directly onto tools.
- Regular monitoring (e.g., engineer or Clerk of Works) will take place when activities generating air pollution are occurring. In the unlikely event that unacceptable levels of air pollution are emanating from the site, the operation will, where practicable, be modified and re-checked to verify that the corrective action has been effective. Actions to be considered include: (a) minimising cutting and grinding on-site, (b) reducing operating hours, (c) changing the method of working, etc.
- All delivery vehicles carrying material with dust potential will be covered when travelling to or leaving the site, preventing the spread of dust beyond the work area.
- Material stockpiles will be reduced as far as is reasonably practicable by using a ‘just in time’ delivery system. All material will also be stored on made ground.

- Any stockpiled material on site will be monitored daily to ensure no risks of dust emissions exists.
- Materials 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 Record of Determination (RoD).

# Landscape and visual effects

The works lie within the boundary of the Cairngorms National Park. However, the works are like-for-like general maintenance of the trunk road surface and its drainage system and as such, the works will not have an impact on the landscape character associated with the park. The National Park Authority will be notified of the works prior to the construction commencing.

There will be a short-term impact on the landscape character and visual amenity of the site as a result of the presence of construction plant, vehicles, and TM. However, people, ancillary plant, vehicles, and materials are restricted to areas of made/engineered ground on the A9, and construction works are programmed to be of short duration, undertaken at night (19:00 – 06:00) on a rolling programme. As such, the visual impact of the works will be minimal.

Upon completion of the works, no residual impacts are anticipated. When complete, the visual appearance will remain largely unaffected, with a renewed road surface and drainage being the only discernible change.

In addition, the following mitigation measures will be put in place during works:

- Throughout all stages of the works, the site will be kept clean and tidy, with materials, equipment, plant and wastes appropriately stored, minimising the landscape and visual effects as much as possible.
- Advice from Cairngorms National Park, if received, will be complied with at all times.
- Works will avoid encroaching on land and areas where work is not required or 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 shall be reinstated as much as is practicable.
- The site will be left clean and tidy following construction.

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

# Biodiversity

The scheme is located wholly within the Drumochter Hills SSSI. The proposed works fall under several 'operations requiring consent' which required consultation with NatureScot. Consultation undertaken with NatureScot confirmed that the works are not likely to damage the protected natural feature(s) of Drumochter Hills SSSI and therefore, consent is not required for the works.

A review of the 'Roads and Bridges Maintenance Activities within the Drumochter Hills, River Spey and River Spey - Insh Marshes European Sites, Highland Region' HRA completed in 2023 to assess a variety of maintenance activities on the trunk roads (including resurfacing and drainage works) concluded that the proposed maintenance activities are not expected to result in Likely Significant Effects (LSE) on the qualifying features of the Drumochter Hills SAC or Drumochter Hills SPA for the following reasons:

- No works will take place within the boundary of the SAC or SPA and no in-water works in a natural watercourse are required; as such, no direct impacts on the qualifying features (habitats and breeding birds) will occur.
- Given the minor and localised nature of the works, the lack of requirement for in-water works in a natural watercourse, and adherence to standard good practice measures for pollution prevention, no risk of significant pollution impacts (to any watercourse or feeding grounds) was identified.
- Although the works will result in a temporary (localised) increase in noise, this is unlikely to significantly affect the qualifying features of the SPA due to the transient nature of the works, the mobile nature of the breeding bird species and the ample alternative foraging habitat in the remainder of the SPA away from the works.
- Although night works will require artificial lighting, the works will be transient, and lighting will be directed in a way to avoid light spillage within the surrounding environment.
- The qualifying habitats within the SAC are immobile and are located primarily upstream of the area of works. Additionally, standard working practices to prevent pollution will be in place.

Activities undertaken on site could potentially have a temporary adverse impact on biodiversity in the area as a result of an increased vehicle presence and the potential for disturbance to protected species and pollution of habitats. However, works are restricted to the A9 carriageway and the number of construction vehicles and

construction operatives required onsite is low given the scale and scope of works. In addition, any species in the area are likely to be accustomed to noise and visual disturbance pertaining to vehicle movements on the A9 and the scheme is of short duration. The potential for significant species disturbance within the area of likely construction disturbance is therefore considered to be low.

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. Therefore, with the following mitigation measures in place, the risk of significant impacts on biodiversity are considered to be low:

- No in-water works will be permitted. Works will be strictly limited to areas required for access and to carry out the works. Unnecessary encroachment onto terrestrial or aquatic areas will not be tolerated.
- All construction operatives will be briefed through toolbox talks prior to works commencing, which will be included in the SEMP. 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 recorded and unrecorded instances of invasive plants or injurious weeds in road verges throughout the works period; should any be identified in working areas, no works will take place within 7m of these areas until the BEAR Scotland Environment Team can provide further advice on additional mitigation measures.
- Site personnel shall remain vigilant for the presence of any protected species throughout the works period. Should a protected species be noted during construction, works shall temporarily halt until the species has sufficiently moved on. Any sightings of protected species shall be reported to the BEAR Scotland Environmental Team.
- Artificial lighting will be directed away from areas of woodland and waterbodies as far as is safe and reasonably practicable.
- If an active bird nest (e.g., eggs or young present, adult sitting on nest) is identified on site, all works within 30m of the nest will stop until the BEAR Scotland NW Environment Team can provide advice.
- 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.

Taking into account the nature and scale of the works and the good site practice mitigation measures which will be adopted during the works, it is anticipated that any biodiversity effects associated with the proposed works will not be significant. This receptor is not considered further in this RoD.

# Geology and soils

The Allt Dubhaig GCRS lies approximately 100m southwest from the scheme and is overlapped by the Drumochter Hills SSSI which is designated for Fluvial Geomorphology of Scotland earth sciences alongside several biodiversity features. As mentioned, consultation undertaken with NatureScot confirmed that consent is not required for the works.

Excavation is required as part of the resurfacing works; however, this is restricted to engineered ground within the A9 trunk road boundary. Some soil exposure/disturbance may occur during the works but this will entail minor and highly localised excavation in areas for replacement of street furniture only. It is not anticipated that this will result in any change to local soil make-up and standard working practices will limit any potential pollution of soils. To mitigate any adverse impacts on geology and soils, the following measures will be in place:

- Any excavated material will be reused and/or redistributed within the scheme extents.
- Topsoil and subsoil reused onsite will be spread evenly in a single layer <200m in height to ensure the soil profile is maintained across the works location.
- Multiple handling of soil derived from excavations must be minimised.
- Topsoil reused onsite will not be transversed by heavy machinery.
- Upon completion of the works, any damage to the local landscape will be reinstated as much as is practicable.
- Mitigation measures to prevent contamination of soils through loss of containment will be strictly adhered to.
- The parking of machinery/vehicles and storage of equipment on grass will be minimised as far as is reasonably practicable.
- All relevant soil management toolbox talks will be included in the SEMP and sediment control measures will be in place where required.
- Additional pollution prevention measures as outlined in the ‘Road drainage and the water environment’ section will be adhered to during construction.

With the above mitigation measures in place, it is anticipated that any geology and soil 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.
- Waste material following the recycling process will be tested for Waste Acceptance Criteria (WAC) prior to their disposal.
- All road planings will be managed in accordance with SEPA Position Statement WAS-G-DEF-07 LRWA 3 and recycled in line with SEPA Guidance WAS-G-DEF-05 on End-of-Waste for Recycled Aggregates.
- 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 will be produced and filed appropriately in accordance with the Code of Practice (as made under Section 34 of Environmental Protection Act 1990 as amended).
- If any presence of coal tar is discovered the following process will be followed:

    - Any coal tar contaminated road planings will be classified as Special Waste.
    - Special waste consignment notes (SWCN) will be obtained from SEPA to allow the movement of the contaminated planings.
    - Coal tar contaminated road planings will be transported by a registered waste carrier to an appropriate waste recovery facility.
    - SEPA will be notified at least 72 hours before (and no longer than one month before) Special Waste leaving site.
- 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

Construction activities associated with the proposed scheme have the potential to cause noise and vibration impacts through the use of equipment and construction vehicles for the proposed activities. However, the works are not located within a CNMA or CQA and the proximity of road space suggests that residents within the local area will have a degree of tolerance to noise and disturbance. Works for the scheme will be completed over a duration of 6 nights on a rolling programme, with the aim being to complete the noisiest work by 23:00. Works with the potential to induce worst-case scenario noise and vibration will also be intermittent, temporary, transient and short-lived.

The road surface is in a poor condition, with a series of defects. Replacing the life-expired surface course affords the benefits of a reduction in mid-to-high frequency traffic noise and a reduction in ground vibrations. As a result, upon completion of the work, noise associated with the movement of vehicles on the trunk road should decrease post construction.

The following mitigation measures will be put in place:

- The Environmental Health Officer (EHO) from Perth & Kinross Council and affected local residents will be notified prior to works.

- The Best Practicable Means, as defined in Section 72 of the Control of Pollution Act 1874, will be employed at all times to reduce noise to a minimum. On-site construction tasks will be programmed to be as efficient as possible, with a view to limiting noise disruption to local sensitive receptors.
- Where possible and where works will take place within 300m of sensitive receptors, the noisiest work operations (e.g., cold milling, using breakers (jackhammers), chipping hammers, use of rollers, etc.) will be completed before 23:00.
- 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.
- Drop heights from vehicles and machinery will be kept to a minimum to minimise noise when unloading.
- 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 have the potential to have temporary adverse impacts on sensitive receptors, including vehicle travellers and NMUs as a result of construction presence and associated noise and delays due to TM.

Although the scheme includes three-way temporary traffic lights with convoy, TM will take place at night when traffic count is at its lowest and no significant congestion issues are noted during the proposed construction hours. Local access will also be granted as requested. Access to any NMU facilities which lie within 300m of the scheme will be maintained.

With the following mitigation measures in place, the risk of significant impacts on population and human health is considered to be low:

- The works schedule and any changes to this will be communicated to local residents throughout the programme.

- Construction lighting will consider the need to avoid illuminating surrounding environment to avoid a nuisance at night, and non-essential lighting will be switched off at night.
- Local access will be granted as required.
- Appropriate provisions / measures shall be implemented within the traffic management to allow the safe passage of NMUs of all abilities through the site.
- Journey planning information will be available for drivers online at the trafficscotland.org website. Journey planning information will also be available for drivers online through BEAR's social media platforms.

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

# Road drainage and the water environment

There is potential for temporary impacts on the water environment due to operation of plant within and within proximity to watercourses and/or drainage systems, which may lead to 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.

No in-water works within natural watercourses will take place and there is no requirement for the abstraction or transfers of water from, or discharges to, a waterbody. As such, the potential for a direct pollution incident within a waterbody is unlikely. Experience gained from BEAR maintenance schemes elsewhere on the network has shown that where standard good working practice is adopted (e.g., adherence to SEPA good practice guidance, utilisation of drain covers or similar, etc.), water quality is protected.

The works may result in potential direct or indirect effects on surrounding waterbodies. The following mitigation measures will be put in place to reduce the risk of pollution incidents as a result of works:

- No in-water works within natural watercourses will take place. If such a need were identified onsite, BEAR Scotland's Environmental Team will be contacted (before the works commence) to allow consideration of potential environmental effects.
- Standard working practices to comply with The Environmental Authorisations (Scotland) Regulations 2018 (EASR) for works in or near water will be detailed in the SEMP and adhered to on site.

- As per EASR 2018, authorisation from SEPA is not required for '*construction and maintenance of land drainage works (including road drains and field drains) that do not affect a natural watercourse'*.
- Appropriate containment measures will be in place to prevent any loss of construction materials into the water environment.
- Appropriate measures will be implemented during resurfacing operations to limit the potential for wastes (i.e., road planings) and materials (i.e., new asphalt) to enter gullies present on site will be visually checked to ensure they have not become blocked as a result of the scheme.
- 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 shall 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 shall 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

During the works there is potential for impacts such as the emission of greenhouse gases through the use of equipment, vehicles, material use, and production and transportation of materials and wastes. However, considering the nature, short-term duration, size and scale of the scheme, and the mitigation detailed below, the risk of significant impacts to climate are considered to be low.

Proposed climate mitigation measures:

- BEAR Scotland will adhere to its Carbon Management Policy.
- All mitigation measures detailed within 'Air Quality' and 'Material Assets and Waste' will be adhered to.
- The works will utilise the use of Warm Mix Asphalt (WMA) for binder layer in favour of Hot Mix Asphalt (HMA).
- Local contractors and suppliers will be used as far as is practicable to reduce fuel use and greenhouse gases emitted as part of the works.
- Where possible, materials will be sourced locally to reduce greenhouse gas emissions associated with materials movement, and waste will be disposed at local facilities, where required.

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

There is a low likelihood (0.1% chance) of surface water and small watercourse flooding each year. There will be no change to the likelihood of flooding on the A9 within the scheme extents upon completion of the works.

Works are restricted to areas of engineered ground of the A9 trunk road and TM will be designed in line with existing guidance. TM will consist of three-way temporary traffic lights with convoy. Pedestrians or other NMUs will be accommodated within the traffic management setup.

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 considered to be low.

# Assessment of cumulative effects

A search of Perth & Kinross Planning Portal identified two approved planning applications within the last 2 years within 300m of the scheme. The first issued on 07/10/2026 was approval for the installation of duct and cabling for a telecommunications mast and the second, was issued 03/06/2026 was approval for land 1.4km west of the Old School House, to have alterations to overbridge and associated works.

An attempt to search Cairngorms National Park Planning Portal was also made but the site was offline for maintenance purposes.

The proposed works are not anticipated to result in significant environmental effects. Due to the nature of the proposed works, no cumulative effects are anticipated with any other developments in the vicinity.

A search of the Scottish Road Works Commissioner website (Scottish Road Works Online) has not identified any other roadworks that are or noted as being planned, on the trunk road at the same time as this scheme. Due to the nature of the proposed works, no cumulative effects are anticipated with any other developments in the vicinity.

BEAR Scotland programme all of its proposed works in line with appropriate guidance and contractual requirements. All schemes are programmed to take into account existing and future planned works, with a view of limiting any cumulative effects 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

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

A review of the 'Roads and Bridges Maintenance Activities within the Drumochter Hills, River Spey and River Spey - Insh Marshes European Sites, Highland Region' HRA completed in 2023 to assess a variety of maintenance activities on the trunk roads (including resurfacing and drainage works) concluded that the proposed maintenance activities are not expected to result in LSE on the qualifying features of the Drumochter Hills SAC or Drumochter Hills SPA. No further assessment is required.

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

This is a relevant project in terms of section 55A(16) of the Roads (Scotland) Act 1984 as it is a project for the improvement of a road and the completed works (together with any area occupied by apparatus, equipment, machinery, materials, plant, spoil heaps, or other such facilities or stores required during the period of construction) do not exceed 1 hectare in area but are situated in whole within Cairngorms National Park and Drumochter Hills 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:**

- Consultation undertaken with NatureScot confirmed that the works are not likely to damage the protected natural feature(s) of Drumochter Hills SSSI and therefore, consent is not required for the works.
- Works are restricted to like-for-like replacement of worn road surface and drainage works, with all works restricted to the A9 carriageway boundary.
- Construction activities are restricted to a 187m long section along the A9 trunk road, with a working area of 0.252ha.
- The works will be temporary, transient, localised and will be completed over a rolling programme over 6 nights.
- Works are not expected to result in significant disturbance.

- The risk of major accidents or disasters is considered to be low.
- Measures will be in place to ensure appropriate removal and disposal of waste.
- By removing the carriageway defects this will provide the section of the A9 carriageway with another life cycle, and significantly improve the ride quality, which will result in safer conditions for road users.
- No impacts to the environment are expected during the operational phase as a result of the 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 the environment.

**Location of the scheme:**

- The scheme will be located within the existing A9 road boundary and as such, no land take will be required.
- The scheme is located within the Cairngorms National Park; however, no change to the visual characteristics of the park is expected due to the nature of the works.
- The scheme is located wholly within Drumochter Hills SSSI which overlaps with Allt Dubhaig GCRS. Consultation undertaken with NatureScot confirmed that consent is not required for the works.
- No LSE have been identified on the qualifying features of Drumochter Hills SAC and Drumochter Hills SPA as a result of the works.
- There are several properties within 300m of the scheme. Mitigation will be in place to reduce the impact of the works on surrounding sensitive receptors.
- There are no Cultural Heritage features of licensable nature located within, or connected to, the scheme. It is considered likely that construction of the A9 trunk road would have removed any archaeological remains that may have previously been present.

**Characteristics of potential impacts of the scheme:**

- Any impacts of the works are expected to be temporary, short-term, non-significant, and limited to the construction phase.
- Measures will be in place to ensure appropriate removal and disposal of waste.
- Residual impacts are considered to be beneficial for the travelling public which may use this stretch of the carriageway. In addition, improved road surface will reduce the noise levels from travelling public and in turn will reduce disruption.

- Any mitigation measures advised by the Cairngorms National Park Authority and NatureScot will be adhered to on site.
- The SEMP will include plans to address environmental incidents.
- Mitigation measures detailed above and, in the SEMP, will be in place with the objective to prevent and, if required, subsequently control any potential impacts on sensitive receptors.
- In the event that INNS are found on site, measures to prevent potential INNS spread will be implemented.
- No in-combination effects have been identified.

# References of supporting documentation

F565 Habitats Regulations Appraisal (HRA) Proforma.

BEAR Scotland. 2023. Roads and Bridges Maintenance Activities within the Drumochter Hills, River Spey and the River Spey – Insh Marshes European Sites, Highland Region.

# 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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