

## Appendix A: Summary of Consultation

## **1. Introduction**

### **1.1 Scoping Consultation**

- 1.1.1 This appendix sets out the scoping consultation undertaken as part of the SEA process with the Environmental Steering Group (ESG). As set out in Chapter 4 (Consultation and Stakeholder Engagement), the ESG was formed in October 2020 as a means of facilitating engagement with statutory and non-statutory authorities for greater transparency throughout the SEA process.
- 1.1.2 The SEA Scoping Report was issued to the ESG in December 2020 for review and comment. Responses to the scoping exercise were received from the following ESG members:
- § NatureScot;
  - § Historic Environment Scotland (HES);
  - § Loch Lomond and The Trossachs National Park Authority (LLTNPA);
  - § Scottish Forestry;
  - § Marine Scotland;
  - § Argyll and Bute Council; and
  - § North Ayrshire Council.
- 1.1.3 The Scottish Environment Protection Agency (SEPA) was unable to provide a response due to a data breach within the organisation, which meant staff were unable to access computers and work systems for several months. However, SEPA did contribute to the ESG meetings before this data breach. The general approach to the SEA was discussed at these ESG meetings.
- 1.1.4 Table A1.1 sets out the correspondence received from ESG members as a result of the scoping exercise, and how these have been responded to / taken into account by Jacobs/AECOM in the Environmental Report.

### **1.2 Environmental Report Consultation**

- 1.2.1 A draft version of the Environmental Report was also sent to ESG members in March 2021. The feedback received and the SEA response to this feedback is provided in Table A1.2.
- 1.2.2 The Environmental Report was sent to Scotland's SEA Gateway and placed on Transport Scotland's website (<https://www.transport.gov.scot/publication/strategic-environmental-assessment-a83-access-to-argyll-and-bute/>) for a public consultation between 29 April and 8 July 2021. Table A1.3 shows the consultation feedback received from the ESG and general public during this period and the SEA response to this feedback.

**Table A1.1: SEA Scoping Report Consultation Feedback**

Consultation Authority / Date Received	Comments/Feedback Received (verbatim)	Response in Environmental Report
<b>Statutory</b>		
	<p><u>Scoping Report</u> Thank you for your consultation which we received on 21 December 2020 about the above scoping report. We have reviewed this in our role as a Consultation Authority under the above Act. This letter contains our views on the scope and level of detail of the information to be included in the Environmental Report. Please note that our view is based on our main area of interest for the historic environment.</p>	No response required
	<p><u>Scope and level of detail</u> We note that the historic environment has been scoped into the assessment and we welcome the ongoing discussions about the project including the SEA at the Environmental Steering Group (ESG) which we are part of. Whilst we are broadly content with the scope and level of detail to be provided in the Environmental Report, we have a number of comments on the approach to be taken which are set out below.</p>	No response required
Historic Environment Scotland (HES) / 22 January 2021	<p>We understand that the Access to Argyll and Bute (A83) scheme objectives set out in paragraph 2.2.1 will be used with other assessment criteria to help inform the selection of a preferred route corridor. We note that objective TP05 relates to the environment. However, as it is currently drafted this objective suggests that it is only the benefits local communities obtain from the natural environment that are its focus. We recommend that this objective is amended to capture the overall need for environmental protection and that this is broadened out from focussing on the 'natural' environment to 'the environment' as a whole. This will be of benefit to the assessment as many of the route corridors identified have been heavily modified by people, over time and this is reflected in the environmental quality of the area including the high number of historic environment designations.</p> <p>We would suggest that objective TP05 is amended as follows: 'TP05 Environment – protect the environment, including the benefits local communities and visitors obtain from the environment by enhancing natural capital assets and ecosystem service provision...'</p>	TP05 has been amended in all PES and SEA documents to incorporate the wording suggested by HES and similar wording suggested by NatureScot, as shown in the NatureScot feedback in this table.
	We note the reference to natural capital assets and ecosystem service provision in the objective. As noted in our discussions at recent ESG meetings we would be happy to share our work to date with you on incorporating the historic environment more fully into these methodologies than they are at present.	Email sent to HES on 05 February 2021, requesting further information on the natural capital work that HES has been working on. Response from HES received and further discussions will be held.

<p>Turning to your consultation questions, we have the following comments to offer:</p> <p><u>1. Does the review of key relevant PPS (Appendix C) provided in this report adequately address all relevant strategic environmental issues related to the Access to Argyll and Bute (A83) scheme?</u></p> <p>We recommend that the Historic Environment Policy for Scotland (HEPS) is added to the list of national plans, polices and strategies to be included within the documents identified in Appendix C. The inclusion of HEPS will allow you to consider the potential effects of the 11 route corridors on the historic environment and to consider how the corridors will affect the cultural significance of the different asset types in a holistic way as part of your assessment.</p>	<p>The HEPS is included in the PPS review of the Environmental Report, provided as Appendix B (Plans, Policies and Strategies). This summarises all key aspects of the HEPS.</p>
<p><u>2. Do the environmental constraints plans in Appendix B and the baseline evidence base (Appendix D) identify all relevant environmental issues which should be considered for the Access to Argyll and Bute (A83) scheme or do additional issues need to be considered?</u></p> <p>On the assumption that the information shown on the constraints plans in Appendix B has been gathered from our portal, we are content with what is shown on them. We note the baseline evidence as shown in section D.8 of Appendix D. However, we note that this largely consists of a count of the number of assets present within the corridors and a number of broad-brush statements relating to its character. As noted in our comments on the SEA objectives and questions, it will be important to think broadly about how the route corridors may affect cultural significance across asset types, including Properties in Care and pilgrimage routes.</p>	<p>All known cultural heritage resources that fall within the 2km study areas for each of the 15 route corridors has been added to the interactive mapping for the project. This includes heritage paths, a dataset that incorporates pilgrimage routes. This dataset was used to inform the environmental baseline and assessment provided in Appendix D (Route Corridor Options Baseline and Assessment).</p> <p>No specific dataset was identified for Properties in Care. However, there are no Properties in Care within corridor 1, which is the focus of the Environmental Report..</p>
<p>As noted in the SEA scoping report, there are interrelationships between cultural heritage and the landscape and visual amenity topic which will need to be taken into account in the assessment and sifting of options. It will also be important to consider the long-term viability of listed buildings as part of the evolution of the baseline. This will need to be taken into account in assessing the impacts of these options in addition to avoiding significant effects on their site and setting. There are interrelationships here with the population and human health and landscape and visual amenity topics that will need to be included in the assessment. For example, decisions about road construction can have an impact on access to buildings, residential amenity, business viability and commercial value, all of which in turn have an impact on long-term outcomes.</p> <p>We note the interrelationships which have been identified in the box on page 25 and would recommend that links with population and human health should be included for its links with the long-term viability of the listed buildings within the route corridors.</p>	<p>The interrelationships between all SEA topics are described in the text for each SEA topic in Appendix C (Detailed Baseline and Assessment). For cultural heritage, this includes a description of the relationships with population and human health and landscape and visual amenity. Potential impacts on cultural heritage resources and their setting are also described in the assessment section of Appendix C (Section 8: Cultural heritage).</p> <p>The historic character and associated value of landscape receptors and visual receptor locations has also been taken into account in Appendix C (Section 9: Landscape and Visual Amenity).</p>

	<p><u>3. Does the methodological approach (Chapter 6), including the proposed Assessment Framework of SEA objectives (Section 6.3) provide an appropriate basis to undertake the SEA of the Access to Argyll and Bute (A83) scheme as it develops?</u></p> <p>We note the helpful overview of the overall process of getting from 11 route corridors to a potential project that would be subject to statutory Environmental Impact Assessment in paragraph 2.3.2. This is important for understanding in very broad terms how the project will develop. We would suggest that it is important to resist the temptation to use jargon such as talking about DMRB stages without having first explained what they are. Being clear and open about terms like this will help to build trust and a greater understanding of the process and ultimately in the conclusions reached.</p> <p>We note diagram 1 on page 12 and that the preliminary engineering studies (PES) have been integrated with the SEA. We would suggest that the SEA scoping report assumes a level of knowledge about the PES in particular which may not exist. We recommend that you ensure that the role of these technical assessments in sifting the route corridors is as clear as possible. It may be worth checking with ESG members that the level of knowledge you have assumed within the SEA scoping report exists within the group.</p> <p>We would also advise that the reporting of corridors which have been discounted is included within the Environmental Report with sufficient information to enable an understanding of the reasons for this.</p>	<p>The PES is described in Chapter 5 (Project Description) of the main Environmental Report. This description builds on the one provided in the SEA Scoping Report, and describes the role of the Preliminary Assessment component of the PES, and how it influenced the corridor selection. The environmental baseline and assessment are provided in Appendix D (Route Corridor Options Baseline and Assessment) of the Environmental Report.</p>
	<p>We note the approach to the assessment as set out in chapter 6. As noted in our response to the SEA objectives and questions, our preference would be for the version of the SEA objective contained in that paper to be adopted in the SEA process as this will give scope for the consideration of potential enhancements where this may be appropriate. That is:</p> <p>§ Protect and enhance (where appropriate) historic and archaeological sites and other culturally and historically important features, landscapes and their settings.</p> <p>It will also explicitly give an opportunity to consider the historic dimension of landscape in relation to the route options.</p>	<p>The SEA objective for cultural heritage has been amended to</p> <p>§ Protect and enhance (where appropriate) cultural heritage resources and their settings.</p> <p>The term cultural heritage resources was used, to align with the Standards for Highways (2020) definition, i.e. A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.</p> <p>The historic character and associated value of visual receptor locations such as Old Military Road and Rest and Be Thankful and Butterbridge viewpoints has informed the detailed baseline and assessment in Appendix C (Section 9: Landscape and Visual Amenity).</p>

	<p>We note and welcome the identification of cultural heritage as a 'prominent topic' for the assessment and we would be happy to provide further information and advice to assist in the gathering of baseline information. We also note the proposed methodology as set out in table 6.3. In line with our recommendation to use the SEA objective as set out in the SEA objectives and questions paper, we would suggest that it may be possible to consider the scope for appropriate enhancements once the question of mitigating impacts of the corridor options has been addressed.</p>	<p>Potential enhancements for cultural heritage resources are described in Appendix C (Section 8: Cultural heritage) of the Environmental Report.</p>
	<p><u>Consultation period for the Environmental Report</u> We note that in section 7.1.3 the specific dates for the rest of the SEA process are yet to be confirmed. We recommend that there is a minimum of an eight-week consultation period for the Environmental Report. Please note that, for administrative purposes, we consider that the consultation period commences on receipt of the relevant documents by the SEA Gateway. We hope this is helpful. Please contact us if you have any questions about this response.</p>	<p>The statutory Consultation Authorities will be provided with a minimum of eight weeks for consultation. Comments on the consultation period commencement and SEA Gateway noted.</p>
<p>NatureScot / 21 January 2021</p>	<p>Thank you for your Scoping Report. NatureScot received this via the Scottish Government SEA Gateway on 21 December 2020. Our comments on the scope and level of detail to be included in the Environmental Report and on the duration of the consultation period are set out below. <u>Overall scheme objectives – TPO5 on environment</u> We welcome that the overall scheme objectives include TPO5 on the environment. The current wording for this is focussed mainly on the benefits which people (local communities and visitors) get from the natural environment. This is indeed important, but we suggest that this objective should also recognise the need to protect the environment overall (including meeting international obligations). We suggest that the wording at the start of TPO5 could be amended to read: • 'TPO5 Environment – protect the environment, including the benefits local communities and visitors obtain from the environment...' The SEA objectives later on in the document recognise the importance of environmental protection overall, so it would be good if the high-level scheme objectives did so as well.</p>	<p>TPO5 has been amended in all PES and SEA documents to use the wording suggested by NatureScot, but with some additional wording on natural capital and ecosystem services suggested by HES in their scoping response above.</p>
	<p><u>Scope of assessment and level of detail</u> Subject to the specific comments set out below, NatureScot is content with the scope and level of detail proposed for the Environmental Report. We have been involved in discussions on the development of this – along with others – at the meetings of the Environmental Steering Group for this project. The region that this plan covers is biodiverse with highly-valued landscapes, and our comments mainly relate to these aspects of the Scoping report. Section D.6 (Biodiversity, Flora and Fauna) describes protected areas and protected species well, but this region is very biodiverse and many important habitats and species in the area exist outside of designated areas. It is important, therefore, that biodiversity found outside of protected areas – often referred to as 'wider countryside' – is also recognised here.</p>	<p>Non-designated habitats and species are described in the biodiversity baseline and assessment of Appendix C (Section 5: Biodiversity). The Landscape and Visual Amenity assessment includes, and recognises the value of, both designated and non-designated landscapes, in line with the European Landscape Convention (see Appendix C, Section 9: Landscape and Visual Amenity).</p>

	<p>Associated with this, it is important to ensure that existing habitats retain their ecosystem functionality – or that this can be enhanced in some way. For example, it there is a need to maintain or enhance the contiguousness of woodland or the hydrological integrity of peatlands and other wetlands, and this should be factored into the plans.</p>	
	<p>In addition, on biodiversity, paragraphs 1.4.2 – 1.4.5, and the box on page 26 regarding biodiversity, should be updated to reflect the changes in terminology following the end of the Brexit transition period.</p>	<p>The following text is included in the Biodiversity section of the final Environmental Report:  <i>'European legislation has been retained in UK law upon the UK's exit from the EU, where practical and appropriate. The Environmental Impact Assessment (Transport) (EU Exit) (Scotland) (Amendment) Regulations 2019 make technical and minor changes relevant to retained EU law to ensure the continued and proper operation of Environmental Impact Assessment legislation in the fields of road and transport works. The Conservation (Natural Habitats, &amp;c.) (EU Exit) (Scotland) (Amendment) Regulations 2019 ensures that the UK will continue to meet its international commitments, particularly under the Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention).</i>                  As of 01 January 2021, upon the UK's exit from the EU, Natura 2000 sites are now referred to as European Sites (NatureScot, 2021).</p>
	<p>In table 3.1, the reference to 'encourage green infrastructure' appears under the Landscape and Visual Amenity topic, though its benefits may well be cross-sectoral. However, green infrastructure is not referenced under any other heading here. Given its broad range of benefits, it would be good if green infrastructure possibilities are considered under other topics as well.</p>	<p>Comments noted. Green infrastructure has also been considered in the Environmental Report under 'Material Assets' in terms of natural assets, and 'Population and Human Health' in terms of outdoor recreation and open space.</p>
	<p>In table 6.1 Draft SEA Objectives, under Climatic Factors there is reference to reducing emissions from Scotland's transport sector by reducing the need to travel and encouraging modal shift. This is laudable, although it is not clear how developing a new route will contribute to this. However, this could be achieved if active travel provision is designed into the route, as well as demonstrating that a new route would be a more effective option for public transport services.</p>	<p>Active travel and public transport provision is being considered as part of the project. Active travel provision for the project will align with wider government priorities, in particular the National Transport Strategy (NTS2) and the Programme for Government (Scottish Government 2020). This policy context is provided in Appendix B (Plans, Policies and Strategies Review).</p>
	<p><u>Approach to the assessment</u>                  Diagram 1 on page 12 of the document (page 14 of the PDF) is useful and sets out a logical approach to the assessment. For those corridors which are scoped out of the SEA as part of the preliminary assessment process, it will be important that rationale is provided even if it is simply project feasibility. For example, if routes are ruled out on the basis of costs or other practicalities, even though these routes may be better options in terms of the environmental impacts, it is important to have this documented. A good audit trail for decision-making is important.</p>	<p>The role of the Preliminary Assessment component of the PES, and how it influenced the corridor selection is described in Chapter 5 (Project Description). The environmental baseline and assessment, that were a key component of the Preliminary Assessment, are provided in Appendix D (Route Corridor Options Baseline and Assessment) of the Environmental Report.</p>

	<p>Section 3 of the Scoping report covers the legislative and policy context. We would expect that the findings from the review of the higher-tier plans would subsequently be used to inform thinking on the assessment as it progresses.</p>	<p>Relevant legislation to the SEA is provided in Chapter 1 (Introduction), Chapter 2 (Background to the SEA) and Appendix B (Plans, Policies and Strategies Review). The key relevant aspects of legislation and policy have informed the development of the SEA objectives and underlying guide questions that have been used for the assessment provided in Appendix C (Detailed Baseline and Assessment).</p>
	<p><u>Documents to be referenced</u> In table 6.3, it would be helpful to reference NatureScot’s HRA guidance (see <a href="https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra">https://www.nature.scot/professional-advice/planning-and-development/environmental-assessment/habitats-regulations-appraisal-hra</a>). In Appendix C, the introduction in Chapter 1 identifies some additional Scottish Government documents from late 2020 that will be reviewed as part of the PPS review for the Environmental Report. Members of the Environmental Steering Group also identified further plans and policies in addition to those listed in table C1.1. The Scottish Government’s document Scottish Biodiversity Strategy Post-2020: statement of Intent (published on 14 December 2020) should also be included here – it can be found at <a href="https://www.gov.scot/publications/scottish-biodiversity-strategy-post-2020-statement-intent/">https://www.gov.scot/publications/scottish-biodiversity-strategy-post-2020-statement-intent/</a></p>	<p>The Scottish Government’s document ‘Scottish Biodiversity Strategy Post-2020: statement of Intent’ has been added to Appendix B (Plans, Policies and Strategies Review). NatureScot’s HRA guidance is referred to in the HRA Screening Report for this project.</p>
	<p><u>Comments in response to consultation questions</u> In Chapter 7: Next Steps, Transport Scotland asks for comments on three key areas. Our responses are below. Question 1 on the review of key relevant PPS (Appendix C) and whether these address all relevant strategic environmental issues. We agree that they do, subject to the comments we have provided above. Question 2 on the environmental constraints plans (Appendix B) and the baseline evidence base (Appendix D), and whether these identify all relevant issues which should be considered. We agree that they do, subject to the comments we have provided above. Question 3 on the methodological approach (Chapter 6). We agree that the methodology is fine, but would suggest that iterative amendments in design to avoid adverse effects are also documented to keep a good, clear audit trail and would also suggest that meaningful indicators are included to ensure that monitoring is useful.</p>	<p>Comments noted. In relation to the comment about keeping a clear audit trail, the Preliminary Assessment process described in Chapter 5 (Project Description) explains how corridor selection has been used to avoid adverse environmental effects. In relation to corridor 1, iterative amendments to the route alignments of the possible route options have also been made to avoid sensitive receptors. These amendments are also described in Chapter 5 (Project Description). The environmental baseline and assessment, that were a key component of the Preliminary Assessment, are provided in Appendix D (Route Corridor Options Baseline and Assessment) of the Environmental Report.</p>
	<p><u>Consultation period for the Environmental Report</u> We note that in section 7.1.3 the specific dates for the rest of the SEA process are yet to be confirmed. However, we would advise a minimum of an eight-week consultation period for the Environmental Report.</p>	<p>The statutory Consultation Authorities will be provided with a minimum of eight weeks for consultation. Comments on the consultation period commencement and SEA Gateway noted.</p>
<p>Scottish Environment Protection Agency (SEPA)</p>	<p>No feedback received.</p>	

Non-Statutory		
Marine Scotland / 3 February 2021	<p>1. <u>Does the review of key relevant PPS (Appendix C) provided in this report adequately address all relevant strategic environmental issues related to the Access to Argyll and Bute (A83) Scheme?</u></p> <p>Yes I believe that in Appendix C addresses all relevant strategic environmental issues are addressed. (Relates to table 3.1) Water Enquire "safeguard access to ports and harbours and encourage their sustainable growth to maximise their potential to facilitate cargo movement, passenger movement and to support other sectors. – Marine Scotland wants to know the reasoning for only ports and harbours sector being safeguarding and not fisheries activities.</p>	<p>Feedback not applicable to corridor 1, the focus of the Environmental Report, as the feedback relates to the marine environment. However, marine constraints were considered in the Preliminary Assessment for the 11 route corridors, which are provided in Appendix D (Route Corridor Options Baseline and Assessment) of the Environmental Report. Appendix C (Plans, Policies and Strategies Review) includes plans that relate to the marine environment.</p>
	<p>2. <u>Do the environmental constraints plans in Appendix B and the baseline evidence base (Appendix D) identify all relevant environmental issues which should be considered for the Access to Argyll and Bute (A83) Scheme or do additional issues need to be considered?</u></p> <p>Route Options 5, 6, 7 8 – Not clear where the LNR is from this section. LNR missing from the maps affected by these routes located at Dunoon and within 2km of study area. Holy Loch LNR, unsure if it has been taken into account in the SEA.</p> <p>Route Options 5,7,11 – Notes Marine Conservation Order in effect from October 2020 between Ottenferry and Port Ann to the mouth of Loch Fyne. These are additional measures put in place for flame shell protection areas. Trawling restricted, dredging prohibited and fishing restriction.</p> <p>Route Options 8 and 9 – Notes that surrounding both Millport and Little Cumbrae Island is a Marine Consultation Area listed. Identified by Nature Scot as deserving particular distinction in respect to the quality and sensitivity of the marine management environment within them.</p> <p>Route Options 10 and 11 – Notes Priority Marine Features present in both route options.</p>	<p>Feedback not applicable to corridor 1, the focus of the Environmental Report, as the feedback relates to the marine environment. However, marine constraints were considered in the Preliminary Assessment for the initial (pre-public consultation) 11 route corridors, which are provided in Appendix D (Route Corridor Options Baseline and Assessment) of the Environmental Report.</p>
	<p>3. <u>Does the methodological approach (Chapter 6), including the proposed Assessment Framework of SEA objectives (Section 6.3) provide an appropriate basis to undertake the SEA of the Access to Argyll and Bute (A83) Scheme as it develops?</u></p> <p>Yes the methodological approach proposed in chapter 6 seems like an appropriate method to take and gives regard to the aspects that might have more influence over certain route corridor options.</p> <p>However there is no reference specifically to just the marine environment under the water environment section or the legislation protecting the marine environment such as Marine Strategy Framework Directive (MSFD) (directive 2008/56/EC), Habitats Directive and Wild Birds Directive. There are a wide range of legislative provisions (and other biodiversity and ecologically relevant obligations) at the international and national level that can be taken into account. For example under the national marine plan policy Gen 12 Water Quality and Resource: 'Developments and activities should not result in a deterioration of water quality of waters to which the Water Framework directive, Marine Strategy Framework Directive or other related Directives apply.' Marine planners and decision makers should be satisfied that impacts of development and use on water have been taken into account. With regards to the WFD, reference should be made to the 'ecological status of the water environment' which includes water quality and</p>	<p>Much of this feedback is not applicable to corridor 1, the focus of the Environmental Report, as the feedback relates to the marine environment. However, marine constraints were considered in the Preliminary Assessment for the initial (pre-public consultation) 11 route corridors, which are provided in Appendix D (Route Corridor Options Baseline and Assessment) of the Environmental Report. The Habitats Directive and Wild Birds Directive are considered in the biodiversity section of Appendix C (Section 5: Biodiversity). The Water Framework Directive is considered in the Water Environment topic section of Appendix C (Section 6: Water Environment).</p>

<p>quantity and changes to water level as well as biological aspects such as the impact of non-native species. These are details missing from the table that could possibly be included?</p> <p><u>Additional comments on SEA Scoping Report</u>        Section 4. Baseline Profile        Section: Water Environment Text Box (p.21) and section D 5.2 Evolution of the baseline and trends (p. 47): “Key concern for the water environment in the future indicate urbanisation and intensive agriculture/aquaculture resulting in pollution to water courses, climate change effects resulting in an increased rainfall and flooding and water scarcity, and ecological impacts.”        Comment: Just to note that although some of the key concerns listed are relevant to the marine environment, they are probably more relevant to freshwater environments. For the marine environment the two most significant pressures that are widespread are climate change contributed by human activity and fishing which impacts on seabed and species.        Proposed change: While most of this report does not separate ‘Water environment’ into different ecosystems (i.e. freshwater and marine), it might be relevant for context that there are different key concerns for these two environments. Although this plan is mainly terrestrial it can be understood why water environment has been chosen to encompass all water bodies.</p>	<p>Feedback not applicable to corridor 1, the focus of the Environmental Report. However, marine constraints were considered in the Preliminary Assessment for the initial (pre-public consultation) 11 route corridors, which are provided in Appendix D (Route Corridor Options Baseline and Assessment) of the Environmental Report.</p>
<p><u>Section D4. Material Assets</u>  <u>D 4.1 Baseline</u>        Section: D 4.1 Baseline (p.45); Route corridors 4,5,6,7,8,9,10, and 11 include fixed crossing over waterbodies which will require consideration for shipping clearance and navigation. There are several ferry services in the region including connections from Greenock to Dunoon and Wemyss Bay to Rothesay in the Firth of Clyde. Otter Ferry on the Cowal Peninsula links to Tarbet across Loch Fyne. HMNB Clyde is located on Gare Loch north of Helensburgh which will require consideration of maritime navigation routes that include crossing of the Firth of Clyde. The STPR2 environmental objectives include safeguarding and improving the provision and connectivity of ferry services to islands and remote island communities.</p> <p>Comment: Is important to consider, especially with regards to these route corridor options (4,5,6,7,8,9,10 and 11) the impact not just on maritime navigation routes across the Firth of Clyde, but also the impact on sectors such as fishing areas and aquaculture sites. The National Planning Framework 3 describes that “land use and marine planning should aim to balance development with environmental quality and activities such as fishing and tourism.” The SEA takes into account the impact of proposals on for example quality of bathing waters, drinking water protected areas. But from the maps below representing various aspects of Aquaculture, Seaweed and Fishing sectors these route options proposed show how these sectors can also be affected.</p> <p>Proposed change: I understand this is an environmental assessment so this information might be captured in other areas of the process, but it would be important to consider other sectors too. Or understand why only maritime</p>	<p>Feedback not applicable to corridor 1, the focus of the Environmental Report. However, marine constraints were considered in the Preliminary Assessment for the 11 corridors, which are provided in Appendix D (Route Corridor Options Baseline and Assessment) of the Environmental Report.</p>

	<p>navigation routes and ferry services are considered as objectives as these industry and sectors also have important transport objectives associates as well and could be impacted by several route options.</p> <p>(*Informal screenshots of Marine Scotland maps were attached to the original email from Marine Scotland)</p>	
	<p><u>D. 9 Landscape and visual amenity</u> Section: Landscape and seascape character (p. 54): The national Landscape Characters Assessment of Scotland as well as the Seascape/Landscape Assessment of the Firth of Clyde (Firth of Clyde Forum 2013) including sensitivity assessment would be used to establish the baseline against which to assess the potential for significant landscape and visual effects. Comment: No comment, just background information update. The Firth of Clyde Forum (FOFC) became the Clyde Marine Planning Partnership (CMPP) back in 2016, in which their principle role is to prepare a regional marine plan for the Clyde Marine Region. The assessment referenced was carried out by the Firth of Clyde Forum, but is now known as the Clyde Marine Planning Partnership. CMPP have drafted their consultation regional marine plan and is with Marine Scotland for review before going out for public consultation.</p>	<p>Feedback not applicable to corridor 1, the focus of the Environmental Report. However, landscape and seascape were considered in the Preliminary Assessment for the initial (pre-public consultation) 11 route corridors, which are provided in Appendix D (Route Corridor Options Baseline and Assessment) of the Environmental Report. Noted and updated the references.</p>
<p>Scottish Forestry / 11 February 2021</p>	<p>Thank you for consulting Scottish Forestry on the A83 SEA Scoping Report. Following on from the ESG discussions at meetings, I was pleased to see the attention given to Forestry and woodland issues outlined in the slide. I am not finding this so easy to follow through the SEA scoping report.</p> <p>From the ESG slide-19.1.21</p> <ol style="list-style-type: none"> <li>Forestry to be discussed across the SEA topics (soils, material assets, landscape &amp; visual, water, biodiversity), including inter-relationships. Impacts on all forestry types will be assessed at a high level.</li> </ol> <p>Needs to be specifically mentioned in the scoping report?</p> <ol style="list-style-type: none"> <li>SEA will consider potential effects on existing and planned forested areas, as well as identify opportunities, e.g. for additional planting (in alignment/with reference to what is set out in the various relevant Forestry Strategies and Management Plans. These plans have also been added to the SEA Plans, Programmes and Strategies review.</li> </ol> <p>Not reflected in Table 6.1- Draft SEA Objectives or Table 6.3 Assessment approach? Needs to be specifically mentioned in the scoping report?</p>	<p>Noted. Response comments provided below.</p> <p>This feedback is discussed in Chapter 4 (Consultation and Stakeholder Engagement). Forestry is discussed across several SEA topics, including in the inter-relationships subsections, in Appendix C (Detailed Baseline and Assessment).</p> <p>SEA objectives now include underlying guide questions to aid the assessment. One of the SEA objectives for the 'Material assets' SEA topic is Reduce the use of natural resources. This includes the following guide question: <i>Does the Access to Argyll and Bute (A83) corridor ensure forestry removal is avoided and potential woodland creation areas are protected wherever possible?</i> The Landscape and Visual Amenity SEA topic assesses the potential effects on landscape elements including existing and planned forested areas. The extent of native and non-native woodland cover within the corridor is shown on Figure C9.2 as is the indicative extent of the planned Rest and Be Thankful Woodland Creation Project.</p>

	<p>3. Avoidance, enhancement and monitoring measures will be described in the Environmental Report</p> <p>For the ER?</p>	<p>Yes, avoidance, enhancement and monitoring measures are described in Chapter 8 (SEA Findings and Recommendations) of the Environmental Report and Appendix C (Detailed Baseline and Assessment).</p>
	<p>4. Areas of commercial forestry, AWI &amp; native woodland to be shown on SEA figures</p> <p>Needs to be specifically mentioned in the scoping report? And that it will be all native woodland not only designated</p>	<p>Areas of commercial forestry, AWI &amp; native woodland have been added to our interactive mapping and the material assets, biodiversity and landscape figures embedded in those respective sections of Appendix C (Detailed Baseline and Assessment, Sections 4, 5 and 9). Areas of commercial forestry were initially added to Figure C9.2 in Appendix C (Section 9: Landscape and Visual Amenity). However, the figure was too 'busy' to be legible and the SEA team subsequently decided to just show the extent of native and non-native woodland cover on that figure as per the dataset received from LLTNPA, which covers the area outside the National Park as well.</p>
	<p>5. Environmental Report will include recommendations on how forestry strategies and management plans are considered at future DMRB stages</p> <p>For the ER?</p>	<p>Yes, the Environmental Report includes recommendations on how forestry strategies and management plans are considered at future DMRB stages – see Chapter 8 (SEA Findings and Recommendations)</p>
	<p><u>Other comments</u></p> <p>§ No mention of Tree Health? I think this is a strategic issue – especially as new corridors creating conduits for pathogens and disturbed soil for invasion.</p> <p>§ PPS – doesn't appear to include UK Forestry Standard , Control of Woodland Removal Policy or Scotland Forestry Strategy, which I would consider are all relevant at a strategic level.</p>	<p>Biosecurity (i.e. prevention of the introduction and spread of pests and diseases affecting tree health) is discussed in the landscape section of Appendix C (Section 9: Landscape and Visual Amenity)</p> <p>Biosecurity forms part of the Biodiversity SEA Objectives and, Appendix C (Section 5: Biodiversity) includes an assessment against the guide question 'does the Access to Argyll and Bute (A83) corridor reduce the risk of spreading invasive non-native species?'</p> <p>These PPS have been added to Appendix B (Plans, Policies and Strategies Review).</p>
<p>North Ayrshire Council / 15 February 2021</p>	<p><i>'Many thanks for consulting North Ayrshire Council on the SEA Scoping report for the above project. It is considered that the Scoping report meets the requirements of the Environmental Assessment (Scotland) Act 2005. It is noted and welcomed that the assessment will consider the likely impacts on the designated sites within the Study Area relating to North Ayrshire (namely, Portencross SSSI).</i></p> <p><i>It is also welcomed that the assessment will refer to the Seascape/Landscape Assessment of The Firth of Clyde (including sensitivity assessment) to help establish the potential for significant landscape and visual effects. I would like to take this opportunity to highlight that the entire coast line of Little Cumbrae is currently described as "isolated coast" in the Council's Adopted Local Development Plan (2019), meaning that that significant protection is</i></p>	<p>Comments noted. The Clyde Marine Planning Partnership was not contacted for the Environmental Report stage as the focus is on corridor 1. However, consideration of landscape and seascape constraints was a key component of the environmental sections of the Preliminary Assessment, which are provided in Appendix D (Route Corridor Options Baseline and Assessment) of the Environmental Report.</p>

	<p><i>afforded to ensure that development does not result in any unacceptable environmental impacts, including Landscape/Seascape.</i></p> <p><i>In addition to the above, it is welcomed that Marine Planning and the National Marine Plan (and its policies) inform the assessment and consultation, but it also considered worth noting that most of the study area includes areas which will be covered by the forthcoming Clyde Marine Regional Plan. It may be worthwhile to consult the Clyde Marine Planning Partnership to inform your assessment.</i></p> <p><i>Please note that the above is an Officers response made on behalf of the Council and will not prejudice any future decision made by the Council (if required). Please get in touch if any of the above raises any questions or comments.</i></p>	
<p>Argyll and Bute Council 18 December 2020</p>	<p>I am content with the process and analysis of the A83 Options.</p> <p>In terms of the legal aspect: it may be worth including the reference to the Nature Conservation (Scotland) Act 2004, where all public bodies are required to further the conservation of biodiversity when carrying out their responsibilities. Following an amendment in the Wildlife and Natural Environment (Scotland) Act 2011; every three years public bodies are also required to publish and make publicly available their report on the actions they have taken to meet their biodiversity duty in the form of a Biodiversity Duty Compliance Report. Perhaps as it is mostly public bodies that are involved in the A83 solution process, the inclusion of this legal duty it would underpin our approach.</p> <p>The latest information on Biodiversity: the LBAP, Biodiversity Duty Compliance report etc. is available on the following link: <a href="https://www.argyll-bute.gov.uk/planning-and-environment/biodiversity">https://www.argyll-bute.gov.uk/planning-and-environment/biodiversity</a></p> <p>The Argyll and Bute Regional Spatial Strategy is available online: <a href="https://www.argyll-bute.gov.uk/moderngov/documents/s166821/Draft%20FULL%20Indicative%20RSS%20v7.pdf#:~:text=Argyll%20and%20Bute%20Indicative%20Regional%20Spatial%20Strategy%20,to%20inform%20the%20preparation%20of%20the%20forthcoming%20Draft">https://www.argyll-bute.gov.uk/moderngov/documents/s166821/Draft%20FULL%20Indicative%20RSS%20v7.pdf#:~:text=Argyll%20and%20Bute%20Indicative%20Regional%20Spatial%20Strategy%20,to%20inform%20the%20preparation%20of%20the%20forthcoming%20Draft</a></p>	<p>These PPS have been added to Appendix B (Plans, Policies and Strategies Review). Data from the Argyll and Bute Regional Spatial Strategy has also been used to inform the baseline data in Appendix C (Detailed Baseline and Assessment).</p>
<p>Loch Lomond and The Trossachs National Park Authority (LLTNPA) / 15 December 2020</p>	<p>Thank you for sharing the draft Scoping Report with us. I have just had a very quick look through the SEA files you have sent and support and agree with most of what is set out. One area which perhaps didn't feature much in the discussion today and is perhaps a little light in the Scoping document in terms of SEA objectives is the importance of outdoor recreation and access. From looking at the SEA objectives there is potential for this to slip through the assessment Is there an opportunity to include a more specific SEA Objective relating to enhancing outdoor recreation and access opportunities?</p>	<p>The SEA Objective for Population and Human Health now includes an underlying guide question, as follows: <i>Does the Access to Argyll and Bute (A83) corridor improve accessibility to open spaces and the path network for physical recreational purposes, including core paths, long distance trails and active travel routes?</i> The SEA objectives have been used to undertake the assessments in Appendix C (Detailed Baseline and Assessment) and are shown in full in Chapter 6 (SEA Approach and Methods).</p>

	<p>There is a likely requirement for any route to have to include to include NMU provision and it is therefore important that assessment is made of opportunities to connect to existing routes and potential impacts the options could have on existing outdoor recreation provision such as core paths, long distance trails and active travel connections to communities. There is also a strong link here for the role access and recreation plays in allowing people to experience the landscape qualities of an area and this should also be assessed so there is perhaps a need for the inter-relationships section to tease out the close relationship between population and health, material assets and landscape. Has the core path plans from each authority been used in the baseline?</p>	<p>The core paths have been added to the active travel figure embedded in Appendix C (Section 3: Population and Human Health), which has been used to inform the assessment. Outdoor recreation is also discussed in the population and human health section of Appendix C (Section 3: Population and Human Health).</p> <p>People using core paths, long distance and hill walking trails and other active travel users constitute visual receptors and as such have been assessed in the Landscape and Visual section of Appendix C (Section 9: Landscape and Visual Amenity). The core paths plans for Argyll and Bute and the National Park have been used in establishing the landscape and visual amenity section of the SEA. The potential opportunities to deliver benefits by enhancing the scenic walking, cycling and hiking routes in the area to take advantage of key views to enable enjoyment of the special landscape qualities of the surrounding area have been mentioned in Appendix C (Section 9: Landscape and Visual Amenity). The relationship between landscape, material assets and population and health is also discussed in the interrelationship section of Appendix C (Section 9: Landscape and Visual Amenity).</p>
	<p>In looking at the plans in Appendix C there are several additional ones not listed from the National Park which may merit attention. As I mentioned in the meeting there is the Trees and Woodland Strategy. There is also our National Park Partnership Plan which sets out the strategic priorities for the National Park and all the partners working within the National park. Finally on the Access and Recreation theme our Core Paths Plan and draft Outdoor Recreation Plan would be useful references.</p>	<p>These PPS have been added to Appendix B (Plans, Policies and Strategies Review). Data from the Argyll and Bute Regional Spatial Strategy has also been used to inform the baseline data in Appendix C (Detailed Baseline and Assessment).</p> <p>The landscape and visual amenity assessment has referred to the National Park Trees and Woodland Strategy, as well as the National Park Partnership Plan and the Core Paths Plan but not to the Draft Outdoor Recreation Plan (given its status).</p>

**Table A1.2: SEA Draft (Pre-Publication Version) Environmental Report Consultation Feedback**

Consultation Authority / Date received	Comments/Feedback Received (verbatim)	Response in Environmental Report
<b>Statutory</b>		
NatureScot / 31 March 2021	<p>In paragraph 4.5.12 there is reference to Biodiversity Net Gain. The term that the Scottish Government is uses is Positive Effects for Biodiversity – which comes from the Planning (Scotland) Act 2019. We suggest that references in the ER and other documents for the project should be to Positive Effects for Biodiversity, given the Scottish Government’s plans for this area of policy as outlined in the NPF4 Position Statement published at the end of 2020. Given that Positive Effects for Biodiversity is a Scotland-focussed term, it may be helpful to use a phrase like ‘Positive Effects for Biodiversity (also known as Biodiversity Net Gain)’.</p>	<p>All terminology in the Environmental Report and its appendices has now been updated to refer to Positive Effects for Biodiversity rather than Biodiversity Net Gain.</p>
	<p>In Table 6.1 which sets out the topic-specific approach and methods, there is reference to a search on the NBN Atlas Scotland for species records within the corridor between 1999 and 2019. This approach is likely to pick up records for species which are surveyed reasonably regularly. However, some species may well be surveyed less frequently – so we advise that there should be a search for species records further back than 1999. This is especially important for those on the IUCN Red List of Threatened Species.</p>	<p>The biodiversity desk study has now been extended from 1989 to 2019 (2020 not included as COVID-19 lockdowns resulted in a reduction in records collected across the country). The baseline information and assessment has been updated accordingly in Appendix C (Section 5: Biodiversity).</p>
	<p>We feel that the approach taken to the preparation of the draft Environmental Report has been thorough and has highlighted the key environmental risks that are likely to arise from the proposed route options in the Glen Croe corridor.</p> <p>Looking ahead to the next stages on the refinement of options and the more detailed planning and design of what is eventually taken forward, there are some key points that we want to raise.</p>	<p>Comments noted. No further action required at the SEA stage.</p>
	<p><b>Non-motorised users</b> We welcome the consideration in the ER of the issues around NMU access within the Glen Croe area. However, given that Glen Croe is a gateway to much of Argyll as well as there being a range of recreational destinations in the area – for example, both The Cobbler and the forest road network – this is an opportunity to improve NMU access in the wider area. It would be helpful to look at the whole NMU corridor from Tarbet over into Cowal and further west. The work on Glen Croe could be the start of a wider project to improve NMU access in a key tourist destination.</p>	<p>Various mitigation and enhancement measures relating to NMU provision were included in the publication version of the Environmental Report. This includes provision for early consultation with key stakeholders and active travel groups in order to develop active travel proposals to complement the project. NMU provision will also be considered in DMRB Stages 2 and 3, in relation to the possible route options being considered.</p>

Consultation Authority / Date received	Comments/Feedback Received (verbatim)	Response in Environmental Report
	<p><b>Landslip risk elsewhere in Glen Croe</b> The hillsides further east on the A83 towards Loch Long are quite steep – and have had landslips recently, as well as in the past which have affected the road. It is important to consider the risks in this area as well so that the landslip issue is addressed throughout Glen Croe as much as possible.</p>	<p>The assessment undertaken for the preliminary engineering support services (Jacobs/ AECOM 2021b) does this. This has considered a wider study area, extending from Ardgartan to Butterbridge. Two of the figures being prepared will summarise the geotechnical constraints and landslide susceptibility. It should be noted that much of lower Glen Croe is assessed as being highly susceptible to landslide/debris flow.</p>
	<p><b>The existing A83 route</b> If the option selected is one where the existing route remains largely as it is – e.g. if the green route on the south-western side of Glen Croe is selected – then it is important to decide what to do with the current road which will probably no longer be used by motorised traffic. There will be a range of options from retaining it as an NMU route to largely removing it and softening the visual impact. There are likely to be consequences of most options, so there is a need for careful consideration of these from as early as possible in the decision-making process.</p>	<p>The treatment of the existing A83 route will be dependent on the possible route option ultimately selected. In the event that the existing route is no longer used by motorised traffic, landscape and visual mitigation proposals will be developed in the next DMRB Stages. The potential opportunities to deliver benefits by enhancing the scenic walking, cycling and hiking routes in the area to take advantage of key views and enable enjoyment of the special landscape qualities of the surrounding area were described in Section 9.7 of Appendix C (Section 9: Landscape and Visual Amenity) of the Environmental Report.</p>
	<p><b>Rest and Be Thankful viewpoint</b> This is a key point on the way into and out of south Argyll – and it would be good to have this as an attractive place for those travelling through the area to enjoy the views. There is a need for investment in and longer-term maintenance of the site. Given its profile, there is an opportunity to create something notable – for example, like the Scottish Scenic Routes installations which have been created at Inveruglas on Loch Lomond and at Glen Falloch further north on the A82, and which create synergies with Argyll as a tourist destination.</p>	<p>The potential opportunities to deliver benefits by enhancing key viewpoints in the area, such as the Rest and Be Thankful car park, and providing high-quality stopping places to take advantage of key views to enable enjoyment of the special landscape qualities of the surrounding area have been described in Appendix C (Section 9: Landscape and Visual Amenity) of the Environmental Report. The wording in paragraph 9.7.4 of Appendix C was updated to reflect this.</p>
	<p><b>Positive Effects for Biodiversity (Biodiversity Net Gain) – woodland management opportunities as an example</b> We welcome the references to Biodiversity Net Gain in the draft ER, as mentioned above. We would like to see exploration of opportunities for Positive Effects for Biodiversity (Biodiversity Net Gain) as early as possible in the decision-making process so that potential nature-based solutions and biodiversity enhancements can be included in the project and planned for. For example, it may be beneficial to re-structure the commercial forestry on the lower slopes of Glen Croe and convert these areas to long-term retention native woodland, rather than maintain clear-fell rotation forestry on such unstable slopes. In addition, the development of riparian woodland on the Croe Water – both above and below the road – could help with stabilisation of burn banks, have biodiversity benefits and help with spate and sediment management.</p>	<p>Positive Effects for Biodiversity are discussed at a high level in Appendix C (Section 5: Biodiversity) of the final Environmental Report and are included in the design recommendations for biodiversity. However, more detailed recommendations will be made following ecological surveys in 2021 and 2022 and reported on in DMRB Stages 2 and 3.</p>

Consultation Authority / Date received	Comments/Feedback Received (verbatim)	Response in Environmental Report
	<p><b>Biodiversity impacts on protected areas</b> The SEA Environmental Report highlights potential impacts on both the Glen Etive and Glen Fyne SPA and the Beinn an Lochain SSSI. However, we feel that these potential impacts can be addressed as long as the precautionary approach set out in the ER continues to be followed.</p>	Comments noted – no further action required at the SEA stage.
	<p><b>NatureScot and LLTNPA areas of interest</b> Given the overlap in our respective remits and the wider implications (especially for the environment, active travel and tourism) for what is taken forward in Glen Croe, we have discussed the key issues in and around the Environmental Report and the wider project with our colleagues at the LLTNPA. We want to ensure that the advice from both organisations is coordinated – and that the wider issues for the rest of South Argyll are highlighted and considered.</p>	Comments noted – no action required.
<p>Historic Environment Scotland (HES) / 1 April 2021</p>	<p>Thank you for sending on the draft Environmental Report for the A83 for comment. Unfortunately, time constraints have not allowed us to consider the draft Environmental Report in depth. However, we note the response in the ER to our scoping comments and we welcome that the majority of our recommendations have been taken forward, particularly in relation to the suggested amendments to the Transport Planning Objective and SEA Objective. Simply for your information, while we note that TPO5 has been updated along suggested lines we would make you aware that one repetition of TPO5 has not been updated (Table 5.1).</p>	TPO5 wording updated in Table 5.1 of the final Environmental Report.
	<p>We note the preferred route has been identified as Corridor 1, within which a number of alternative design solutions are available and an assessment of the potential effects of these options has been presented in Appendix C: Cultural Heritage - Detailed Baseline and Assessment. As the draft ER notes, there are no historic environment assets within our statutory remit within Corridor 1. The assessment notes the presence of the Category C listed Rest and Be Thankful Stone (LB11816) as well as the Old Military Road and consideration of the potential for impacts on these assets and their setting as a result of the options is presented.</p> <p>In terms of the key findings and recommendations we are generally content to agree with these and will offer further comment on this as part of our formal response to the consultation on the PES and ER</p>	No response required
<p>Scottish Environment Protection</p>	<p>There are three elements of the Draft SEA that I had comments on and they were:</p> <p>We welcome the statements regarding opportunities to reduce flood risk.</p>	Comments noted – no further action required at the SEA stage.

Consultation Authority / Date received	Comments/Feedback Received (verbatim)	Response in Environmental Report
Agency (SEPA) / 12 April 2021	<p>Whether SEPA's previous discussions with Transport Scotland about Climate Change allowances have been reflected in the document (or whether it is appropriate at this stage to reflect this).</p> <p>The status of delivery mechanisms for the outcomes.</p>	<p>Consideration of Climate Change allowances in accordance with SEPA (2019) LUPS-CC1 'Climate change allowances for flood risk assessment in land use planning' have been included within sections 6.3 (Detailed Baseline) and 6.4 (Evolution of Baseline and Trends) of Appendix C (Water Environment) of the Environmental Report. As detailed within Table C6.10, consideration of flood risk in line with applicable guidance should be undertaken at later DMRB stages.</p> <p>The delivery mechanisms for the SEA objectives are described in the mitigation, enhancement and monitoring recommendations (Table 10.1) of the main Environmental Report. These will be updated at each DMRB stage.</p>
<b>Non-Statutory</b>		
Loch Lomond and The Trossachs National Park / 31 March 2021	<p>Thank you for consulting the National Park on the draft SEA Environmental Report. Overall this looks a very comprehensive assessment and we broadly agree with the identified impacts.</p> <p>However, there could be opportunities for the SEA to provide further in-depth thinking on mitigation and enhancement measures from both a National Park and wider Argyll perspective on landscape mitigation and landscape gains, recreational gains and biodiversity gains to inform thinking at the subsequent stages of project assessment and design.</p> <p>The following specific points are areas we think could be further addressed or expanded upon into the SEA as appropriate or into the subsequent DMRB stages and route option appraisals.</p> <ol style="list-style-type: none"> <li>The NMU provision to accompany the new road. We think this needs to be considered holistically from the junction with the A82 at Tarbet right through to the top of the Rest &amp; be Thankful. This would provide real multiple user benefits for the local communities from Tarbet, Arrochar, Succoth and Lochgoilhead, as well as for tourist and recreational users accessing the hills and forest road network from the Trunk Road Corridor and from the railway station at Tarbet. It would also provide a logical starting point for developing future NMU provision into Argyll beyond the Park boundary and could for example enhance the Loch Lomond and Cowal Way Strategic route.</li> <li>The possibility of landslip risks further south east towards Ardgartan should be considered if not done so. The January 2020 slip and the historic 1913 slip that blocked the glen were both on the lower slopes of the Cobbler and this risk is expected to remain.</li> </ol>	<p>Comments noted. Responses to specific points provided below.</p> <p>Various mitigation and enhancement measures relating to NMU provision are included in the mitigation, enhancement and design recommendations of the final Environmental Report. This includes provision for early consultation with key stakeholders and active travel groups in order to develop active travel proposals to complement the project. NMU provision will also be considered in DMRB Stages 2 and 3, in relation to the possible route options being considered.</p> <p>The assessment undertaken for the preliminary engineering support services (Jacobs/ AECOM 2021b) does this. This has considered a wider study area, extending from Ardgartan to Butterbridge. Two of the figures being prepared will summarise the geotechnical constraints and landslide susceptibility. It</p>

Consultation Authority / Date received	Comments/Feedback Received (verbatim)	Response in Environmental Report
	<p>3. The implications for future felling and restocking proposals for existing forest cover. The forest blocks on the lower slopes of the Cobbler and along the Green Route on the southwest of Glen Croe could both be impacted directly or indirectly by way of changes to their accessibility for harvesting and extraction, to varying degrees depending on the option chosen. Restocking options could allow for landscape and biodiversity mitigation and gains from the overall scheme.</p> <p>4. The future treatment of the existing A83 should be considered. We don't want the existing road to be simply left as an abandoned piece of road with landscape detriment and no practical benefit. Could it be left in situ and maintained in an appropriate way as NMU provision? Can it be removed or profiled in some way to soften its visual impact? If it ceases to be maintained, does that increase the landslip threats to the Old Military Road?</p> <p>5. The viewpoint and carpark and bus turning circle at the Rest &amp; Be Thankful and B828 road junction as an opportunity for investment. Glen Croe is the gateway between the National Park and the rest of Argyll and is one of the Special Landscape Qualities of the National Park. This location is the prime viewpoint for it but it has become degraded over time and merits significant investment as part of this scheme to become an attractive feature for enjoyment of the scenery and to help send the message that Argyll is open for tourism business.</p> <p>6. The Beinn an Lochain SSSI and the Glen Etive and Glen Fyne SPA both need to be considered but we think it is likely that these can be accommodated within the range of route options without great difficulty.</p>	<p>should be noted that much of lower Glen Croe is assessed as being highly susceptible to landslide/debris flow.</p> <p>The potential opportunities to provide mitigation planting that seamlessly integrates with the surrounding landscape and deliver positive landscape effects by way of large-scale woodland planting have been referred to in Appendix C (Section 9: Landscape and Visual Amenity – Section 9.7.3) of the publication version of the Environmental Report. The accessibility of different forest blocks will be considered at DMRB Stages 2 and 3.</p> <p>The future treatment of the existing A83 will depend on the possible route option ultimately selected. For example, the existing road alignment may end up accommodating mitigation measures for options along the valley floor or below the road (including viaduct options). Allowing continued use for NMUs would require ongoing maintenance for clean-up and perhaps operational considerations to close the route if required, although the implications for trunk road operation are obviously avoided. If it ceases to be maintained completely then clearly that may well increase exposure of the OMR to the landslide threat.</p> <p>The comments provided by LLTNPA will be considered by the project engineers.</p> <p>The potential opportunities to deliver benefits by enhancing key viewpoints in the area, such as the Rest and Be Thankful car park, and providing high-quality stopping places to take advantage of key views to enable enjoyment of the special landscape qualities of the surrounding area have been mentioned in Appendix C (Section 9: Landscape and Visual Amenity, paragraph 9.7.4) of the Environmental Report.</p> <p>Comments noted, no further action required.</p>

Consultation Authority / Date received	Comments/Feedback Received (verbatim)	Response in Environmental Report
Argyll and Bute Council / 1 April 2021	Doc 0013- Page 3 should read NatureScot rather than Natural Scotland.	The wording in Appendix C (Section 4: Material Assets, paragraph 4.3.2) of the Environmental Report has been amended to reflect the author of the report being referred to (Scottish Government).
	Re. peat and peaty soils and trees: the importance of peat and trees for carbon sequestration is well documented, however grasslands make a valuable contribution too - it is a matter of appropriate management.	Reference to the importance of grassland and natural habitats for carbon sequestration (in addition to peat and woodland) has been added to the baseline and assessment in Appendix C (Section 1: Climatic Factors) and Section 7.2 (paragraph 7.2.3), Section 7.5 (paragraph 7.5.3) and paragraph 8.2.6 of the main Environmental Report.
	Re. habitat enhancement and modification... worth considering the use of over burden (tunnel excavations and other won material) in combination with the addition of a SUDS system - which could be tiered; placement determination will be influenced by the preferred option within Glen Croe.	This should be considered in DMRB Stages 2 and 3, in relation to the possible route options being considered.
	Depending on the options, consideration should be given to designing the manmade features to be unattractive to wildlife so as to avoid RTA's.	This should be considered in DMRB Stages 2 and 3, in relation to the possible route options being considered.
	Justification for designated site, I am content to leave this to NatureScot...as they have a handle on the bigger picture.	Comments noted, no further action required.

**Table A1.3: SEA Final (Publication Version) Environmental Report Consultation Feedback**

Consultation Authority / Date received	Comments/Feedback Received (verbatim)	SEA Response
<b>Statutory</b>		
SEPA / 9 June 2021	<p>As you will be aware SEPA was subject to a cyber-attack on Christmas eve. This severely impacted our organisation and systems, including our ability to respond to your SEA scoping consultation. As such we were not able to respond in detail to your scoping consultation within the statutory timescale, instead we referred you to the advice contained in the SEA Topic Guidance Notes on our website.</p> <p>Work on the Access to Argyll and Bute (A83) plan has progressed significantly in the meantime, and I understand that the ER has now been submitted. As such it is unlikely that you still require SEPA's input to the scope of the assessment. However, if you do still require SEPA's input I would ask that you contact me as soon as possible. If I don't hear from you by close of play on Friday 18 June, I will assume that you do not require any further SEPA input to the scope of the assessment.</p> <p><i>SEA Note: No SEPA comments received on the Environmental Report due to the reasons mentioned above.</i></p>	Comments noted, no further action required.
Historic Environment Scotland / 1 July 2021	<p>Thank you for your consultation which we received on 13 May 2021 about the above and its Environmental Report (ER). We have reviewed these documents in relation to our main area of interest for the historic environment. The first part of this response relates to the preferred corridor with part two focusing upon its environmental assessment.</p>	Comments noted, no further action required.
	<p><u>Part 1: Access to Argyll and Bute (A83) Preliminary Assessment – Preferred Corridor</u></p> <p>We welcome the engagement undertaken throughout this project through the environmental steering group that has been put in place. The group provides an important forum for discussion on emerging environmental issues as well as project development communication and advice. We look forward to continuing to work with all stakeholders to ensure that proposals fully take into account the historic environment as the project develops.</p>	Comments noted, no further action required.
	<p>In terms of the identification of a preferred option we can confirm that route corridor 1 does not raise significant concerns for our statutory remit. As part of the assessment process carried out to identify this preferred option we note the recognition of the potential impact on the historic environment of a number of the route corridors put forward as part of the preliminary assessment. As is stated in the environmental report, the high level assessment of these corridors against the historic environment baseline indicated that the most significant effects on this resource were likely from corridors 8a, 8b and 9, with further significant effects identified for route corridors 5, 6, 7, 10 and</p>	Comments noted, no further action required.

Consultation Authority / Date received	Comments/Feedback Received (verbatim)	SEA Response
	<p>11. We concur with these findings and welcome that this work has informed the choice of the preferred route corridor.</p>	
	<p><u>Part 2: Environmental Report</u></p> <p><b>Scoping Response</b> We welcome the response to our scoping comments presented here and we welcome that the majority of our recommendations have been taken forward. In particular we welcome the response to our suggested amendments to the Transport Planning Objective 5. However, in response to the draft ER we noted that there was one repetition of TPO5 that had not been updated. While reference to TPO5 through the document is now consistent it appears that the second reference to the 'natural environment' has reappeared as opposed to simply 'environment'. This is not in line with the response to this issue stated in Appendix E. We have therefore assumed this is a drafting error.</p>	<p>All references to TPO5 in this SEA Post Adoption Statement use the final wording suggested by HES and NatureScot.</p>
	<p><b>Alternatives Considered</b> As you will be aware, the Environmental Assessment (Scotland) Act 2005 requires consideration to be given to the reasonable alternatives to the proposals. We note that it is your view that both the work carried out through the ongoing development of the STPR2 and the high level assessment of the 15 route corridors as part of the preliminary engineering assessment meet these requirements. The environmental report (in particular appendix D) presents an assessment of these 15 route corridors and we welcome that the identified environmental effects of these alternatives have fed into the sifting of options down to the preferred route corridor. We also understand that the alternatives available within the preferred route corridor will be subject to further assessment as part of DMRB Stage 2.</p>	<p>Agreed. The 15 original route corridors were considered as reasonable alternatives, as are the possible route options within corridor 1.</p>
	<p><b>Topic Specific Methodology</b> We note that the SEA Objective identified for the historic environment has been amended in response to our previous comments and we note the alignment with the Standards for Highways (2020) definition. The assessment guide questions also offer a level of detailed consideration which aids in informing assessment findings.</p>	<p>Comments noted, no further action required.</p>
	<p><b>SEA Topics and Ecosystem Services</b> We welcome the commitment here to continue to engage with us on how approaches to ecosystem services and natural capital assessment that more fully consider and understand the wide-ranging role played by the historic environment resource across these methodologies can be developed. As the environmental report sets out that natural capital assessment will be progressed at DMRB Stage 2 we welcome the opportunity for continuing engagement through the environmental steering group in this area.</p>	<p>Further discussions on natural capital with HES will be held, including discussions within the ongoing regular ESG meetings.</p>

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	<p><b>Environmental Constraints and Opportunities</b> No significant effects arising from the possible route options within the preferred route corridor on historic environment assets within our statutory remit have been identified. We are content to agree with this finding and the reasoning put forward in the environment report. The comments regarding the setting of the Category C listed 'Rest and be Thankful' stone are noted and we would expect further consideration be given to this as design and assessment work continues for the possible route options. We note that no opportunities have been identified in relation to the designated historic environment assets within Corridor 1. However, as the assessment notes, the further stages of DMRB assessment will allow for consideration of the military road that runs through the corridor and any opportunities around protection and interpretation that can be brought forward.</p>	<p>Potential opportunities for the designated historic environment assets will be considered during DMRB stages 2 and 3.</p>
	<p><b>Mitigation and Monitoring</b> The mitigation and monitoring proposals relating to the historic environment are noted as is the commitment to the development of cultural heritage design objectives to guide and inform proposals going forward. We would be happy to advise and offer comment on these as proposals are developed and into the construction phase.</p>	<p>Further discussions on mitigation and monitoring with HES will be held, including discussions within the ongoing regular ESG meetings.</p>
	<p><b>Appendix C: Cultural Heritage - Detailed Baseline and Assessment</b> This appendix sets out the detailed cultural heritage assessment of the 5 route options within the preferred route corridor. We are content to agree with the findings presented and welcome the proposed mitigation and monitoring put forward.</p>	<p>Comments noted, no further action required.</p>
	<p>None of the comments contained in this letter constitute a legal interpretation of the requirements of the Environmental Assessment (Scotland) Act 2005. They are intended rather as helpful advice, as part of our commitment to capacity building in SEA.</p>	<p>Comments noted, no further action required.</p>
<p>NatureScot/ 5 July 2021</p>	<p>Thank you for your Environmental Report. NatureScot received this via the Scottish Government SEA Gateway on 13 May 2021. We have reviewed these documents in relation to our main areas of interest.</p> <p><b>Comments provided on draft Environmental Report – March 2021</b> We provided comments at the beginning of April 2021 on the draft environmental report. As we commented at that stage, we feel that the approach to the preparation of the Environmental Report has been thorough and has highlighted the key environmental risks that are likely to arise from the proposed route options in the Glen Croe corridor.</p>	<p>Comments noted, no further action required.</p>

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	<p>We commented on a number of key issues that should be taken into account in the next stages of the refinement of options and the more detailed planning and design of what is eventually taken forward:</p> <ul style="list-style-type: none"> <li>§ Non-motorised users</li> <li>§ Landslip risk elsewhere in Glen Croe</li> <li>§ The existing A83 route</li> <li>§ Rest and Be Thankful viewpoint</li> <li>§ Positive Effects for Biodiversity (Biodiversity Net Gain) – woodland management opportunities as an example</li> <li>§ Biodiversity impacts on protected areas</li> </ul> <p>The Environmental Report includes a commentary on how these points have been addressed or will be taken on board in further work. We are happy with the Transport Scotland response on these points – and look forward to addressing them further through the A83 Environmental Steering Group (ESG).</p> <p><b>Assessment of the medium-term options developed since March 2021</b> The medium-term options that have been developed since March 2021 (and that were outlined at the ESG in May 2021) will need a suitable assessment of the potential environmental impacts. There are potential cumulative impacts when these medium-term options are combined with the proposed long-term solutions to the route of the A83 through Glen Croe. There is an opportunity for the SEA process to be clearer on the mitigation required and to make it more specific. A carefully-planned approach will be needed to avoid significant impacts on the natural and other assets in Glen Croe.</p>	<p>Comments noted. The key issues have been covered in the Mitigation and Monitoring Framework contained in Section 5 (SEA Monitoring Framework) of this SEA Post Adoption Statement. Further discussions on these and other topics will also be held via the ongoing regular ESG meetings. These key issues will also be addressed in the EIA proposed for the Medium-Term Solutions, described in Section 1.4 (Medium-Term Solutions) of this SEA Post Adoption Statement (main report).</p> <p>The medium-term solutions were not available at the time of preparing the Environmental Report and are still in the early stages of development. The cumulative environmental impacts of the medium-term and long-term solutions and any associated mitigation and enhancement measures, will be addressed in the EIA proposed for the medium-term solutions, described in Section 1.4 (Medium-Term Solutions) of this SEA Post Adoption Statement (main report). This will allow mitigation and enhancement measures to be developed that are more specific and detailed, when the medium-term solutions are at a more defined stage of development.</p> <p>The long-term solutions will also need to incorporate the environmental mitigation and enhancement measures that will be included in the Medium-Term Solutions EIA, given the decision on the long-term solutions and design of that scheme comes later.</p>
<p><b>Non-Statutory</b></p> <p>Scottish Forestry / 17 June 2021</p>	<p>I realise that the consultation period has ended, however, I am just expanding on the issues that were raised by myself and Alan Bell at the last ESG meeting.</p> <p>In particular these comments relate mainly to the green route in the SEA and the medium term solution presented at the last ESG where it dissects the woodland.</p>	<p>These comments were received within the Environmental Report consultation period, which ran from 29 April to 8 July 2021.</p> <p>Noted.</p>

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	<p><u>A. Impact on Forest Plan</u></p> <ul style="list-style-type: none"> <li>§ The corridor required to implement the medium term / green route will be substantial, given a 7.3m running surface, steep slopes that will require cut and fill. This will have an impact on the management of forestry above the road.</li> <li>§ Essentially, these routes may require all the forest above the proposed route to felled, as it will no longer be able to be worked as a productive woodland. A sensible restock option would then be to establish a suitable native woodland type, that is capable of attaining a climax woodland community without further intervention.</li> <li>§ This would also have to be integrated into the landscape in the surrounding woodland.</li> <li>§ My rough estimation is that these proposals could mean felling at least 100ha of forest within a very short timescale.</li> <li>§ There is also likely to be an impact on how woodland below the road can be managed safely and the access required.</li> </ul>	<p>An option for the medium-term solution along the lines of the Green Option was not one of the possible route options being considered at the time of writing the Environmental Report. However, these comments are being considered by the medium-term solution project team and will be addressed in their EIA.</p> <p>Any medium-term solution option taken forward will require a plan for replanting native woodland species that will be discussed and agreed with ESG members to ensure integration of the planted area with the surrounding landscape and to maximise biodiversity enhancement opportunities.</p> <p>Comments on estimation noted.</p> <p>The design of the medium-term solution needs to consider how safe access to and management of the adjacent land may be maintained during the construction and operation of the medium-term solution.</p>
	<p><u>B. Water and soil</u></p> <ul style="list-style-type: none"> <li>§ The impact of large clear-felling and restocking activity needs to be fully considered when choosing the route.</li> <li>§ This includes a temporary increase in runoff speed and nutrient load, as well as the potential for diffuse pollution from ground disturbance.</li> <li>§ There would then be a period of increased run off until the site has greened-over and trees establish.</li> </ul>	<p>The potential impacts of clear-felling and restocking on erosion and surface water runoff will be considered in the possible route option selection process, including the medium-term solutions.</p> <p>The SEA Mitigation and Monitoring Framework provided in Section 5 (SEA Monitoring Framework) of this Post Adoption Statement includes measures to reduce flood risk, monitor water quality and design the project in line with best practice and relevant guidance, considering the requirements of The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) (CAR) and in consultation with SEPA.</p> <p>The contractor will also be required to implement erosion and surface water management measures for any felling activities.</p>
	<p><u>C. Landscape</u></p>	<p>The timing of growth for the native woodland and integration with the surrounding landscape will be discussed with ESG members and taken into account in the planting plan.</p>

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	<p>§ The integration of what happens above and below the road is key and the timescale for establishing native woodland can be a long one, certainly more than 10 years before the visual impact of the felling is counteracted by the native woodland.</p>	
<p>Loch Lomond and The Trossachs National Park / 1 July 2021</p>	<p>We have reviewed the SEA Environmental Report and we agree with many of the assessment findings. However, one area where we think that further analysis could be undertaken is regarding the cumulative impacts of all the works going on around the area and specifically the extent of the medium term solution works on the A83 on top of the current continuing programme of catch pit construction, boulder catch nets, etc. We consider there is obviously a big risk of cumulative impacts from the impact of a significant medium term new road and then in the future a better new road.</p>	<p>Comments noted. The medium-term solutions were not among the possible route options being considered at the time of writing the Environmental Report but are now described in Section 1.6 (Medium-Term Solutions) of this Post Adoption Statement (main report). Responses to the specific comments are provided below.</p>
	<p>From reviewing the SEA we note that Table 8.5 does cover cumulative effects to some extent and does identify the risk of negative impacts. However, we consider this is quite light touch and we would encourage a proper appraisal / assessment of the potential impact of the medium-term options as there is potential for cumulative impacts when combined with the long-term options. We note the comments from Scottish Forestry advice attached that some of the medium term road options could necessitate harvesting of 100ha of conifer plantation as preparatory works, which illustrates the potential scale of cumulative impacts even before the road works themselves are considered.</p>	<p>Comments noted. Due to the early stage of development of the medium-term solutions, the cumulative effects of the medium and long-term solutions combined will be more effectively addressed in the medium-term solutions EIA. The long-term solutions will also need to incorporate the environmental mitigation and enhancement measures that will be included in the medium-term Solutions EIA, given the decision on the long-term solutions and design of that scheme comes later.</p>
	<p>Currently the identified mitigation is merely to defer to subsequent DMRB stages to reduce the effects of the A83 project. Perhaps there is an opportunity for the SEA to undertake further appraisal and also recommend bolder actions in the form of identified mitigation. Our thoughts are effects could be mitigated by seeking a planned approach so that the medium term solutions identified seek to align with the final route option. In an ideal world the medium term solution would be turned into the long term solution via an on-line upgrade.</p>	<p>The SEA Mitigation and Monitoring Framework has been updated and is provided in Section 5 (SEA Monitoring Framework) of this Post Adoption Statement (main report). The coordinated planning required for the medium term and long term solutions to reduce potential cumulative effects is described in Section 6.1 (Co-ordination of Medium and Long-Term Project Solutions) of this Post Adoption Statement (main report).</p>
<p><b>Comments received from general public</b></p>		
<p>24 May 2021</p>	<p><b>Are you content with Route Corridor 1 as the recommended preferred route corridor?</b> Yes</p>	<p>Comments noted, no further action required.</p>
	<p><b>If you wish, give a reason for your answer.</b> Makes most sense and the right solution must have speed of delivery as one of key objectives.</p>	
	<p><b>Do any of the routes affect you?</b> Yes</p>	
	<p><b>Other Routes – If yes, which route(s) and how/why?</b></p>	<p>Comments noted, no further action required for the SEA.</p>

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	<p>In my opinion there are four key objectives to assess against the 5 options - these are</p> <ol style="list-style-type: none"> <li>1. Speed of delivery - requested by businesses but important for regular users like ourselves and to protect tourism which in particular was badly affected by the frequent road closures in 2020 as if the COVID restrictions weren't enough.</li> <li>2. Practicality and sustainability</li> <li>3. Meets key environmental requirements</li> <li>4. Cost - Including ongoing maintenance</li> </ol> <p>Assessing all of these in a scoring system then the most sensible solution is YELLOW. Factors in its favour are less impact on existing road and OMR during construction, viaduct solutions are not uncommon in Scotland so some competency already available, possible reduction/ mitigation of significant landscape and visual effects and opportunity to make this a road which magnifies the beauty of the glen and OMR can be kept as an alternative when maintenance on this new route is required. Importantly this would be less impacted by ongoing landslides in the area.</p> <p>Other options should be rejected because</p> <p><b>Purple and Pink</b> - too slow due to tunnel construction, heavy maintenance of tunnels, no obvious alternative route during maintenance or road traffic incident and greater cost and damaging effects on the environment.</p> <p><b>Brown</b> - slow due to keeping traffic moving, landslides and construction difficulties, debris shelters are new to Scotland so not sure sufficient expertise available to support design and construction, additional maintenance - not just ongoing but due to landslides which will no doubt continue.</p> <p><b>Green</b> - not clear that this route would not also become subject to frequent landslides as the other side and therefore the design might be subject to changes during construction adding more viaducts and landslide mitigations etc. This will slow down delivery and increase cost of solution and ongoing maintenance. Also could be disastrous from an environmental point of view. One side of the glen already looking pretty awful from the increasing unsightly landslide mitigations.</p>	
	<p><b>Are there any other routes you would like to suggest within the recommended preferred route corridor?</b></p> <p>I wonder if the viaduct option should be a straighter road through the glen rather than hugging the existing road at times - thinking about making it easier for larger vehicles in terms of gradient and no bends.</p>	<p>Comments noted, no further action required for the SEA.</p>

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	<p>Are there any environmental / cultural / heritage features within the recommended preferred route corridor of particular interest to you?</p> <p>Yes.</p>	<p>Comments noted, no further action required for the SEA.</p>
	<p><b>If yes, please give details.</b></p> <p>The key opportunities identified in the SEA section 9 are excellent and valid and should be considered and integrated where possible into the final design and plans for ongoing management of the road.</p> <p>I would also like the existing road and its ugly mitigations to be returned to a natural condition improving the state of the overall glen and keep the OMR as the alternative when required.</p>	<p>Comments noted, no further action required for the SEA.</p>
	<p><b>Is there anything else you think we should consider about the recommended preferred route corridor or the possible route options?</b></p> <p>I would like to call out the following dependencies for a professional, competent and cost managed design, delivery and ongoing management :-</p> <ol style="list-style-type: none"> <li>1. Independent Professional Project Management engaged for length of project</li> <li>2. Proven Construction Businesses independently selected</li> <li>3. Design frozen before start of construction, only changes due to technical difficulties encountered should be allowed.</li> <li>4. Commitment of Scottish Government in terms of funds including ongoing maintenance</li> </ol> <p>Commitment to keep OMR available as alternative route for planned or unplanned closure of new route for maintenance, landslide etc.</p>	<p>Comments noted, no further action required for the SEA.</p>