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Environmental Impact Assessment Record of Determination

A87 Carrich Bridge Ducting

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Project Details

Description

BEAR Scotland has been commissioned by Transport Scotland to undertake electricity ducting works on the A87 Carrich Bridge, which is adjacent to the A87 Skye Bridge. The existing power supply cable for the A87 Skye and Carrich Bridges belongs to Transport Scotland and currently also supplies power to Otter Cottage located on Eilean Ban, the island which links the two bridges. Responsibility for supplying power to Otter Cottage is being transferred from Transport Scotland to SSE, and SSE have advised that a new cable is required for this purpose. As there is no room to place the new power cable within the interior of the A87 Carrich Bridge, the works will entail installation of a painted steel duct on the underside of the bridge to carry the new electric cable (11.5 kilovolt-amps [KVa]) across the bridge to Eilean Ban.

The duct will be fixed to existing channels within the bridge soffit of the uplink footway using mechanical fixings (clamps and bolts); therefore, drilling is not required to fix new brackets. The new duct will extend beyond both bridge abutments on the uplink (south) side of the bridge. This will allow SSE to continue running the new cable both east and west of the bridge. Attachment of the new duct to the bridge will be carried out from the A87 either via a mobile elevated working platform (MEWP) with underbridge extension capabilities or via a portable scaffold unit suspended over the side of the bridge, as access below the bridge deck will be required. Traffic management (TM) is expected to consist of a lane closure with temporary traffic lights in place.

The works are currently programmed to be completed within the 2022/2023 financial year. However, works may be delayed into the 2023/2024 financial year (April 2023 to March 2024). Works are expected to be completed over 2-3 weeks by utilising night-time working hours; however, the programme has not yet been finalised and if changes are required, the works may be carried out during daylight hours.

Location

The A87 Carrich Bridge spans the Kyle Akin between mainland Great Britain and Eilean Ban, a small island between the mainland and the Isle of Skye. The A87 Carrich Bridge (centre point NG 75038 27314) is located west of Kyle of Lochalsh on the western coast of Scotland and is adjacent to the A87 Skye Bridge (Figure 1).

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Figure 1. Location of A87 Carrich Bridge in relation to A87 Skye Bridge and Otter Cottage on Eilean Ban. Inset shows scheme location in the wider area. *Source: OpenStreetMap*

Description of local environment

Air quality

The scheme is not located within any Air Quality Management Area (AQMA) and no air quality monitoring stations are located in the vicinity of works (<u>Air Quality</u> <u>Scotland</u>). The nearest air quality monitoring site to the scheme is located approximately 65km southeast in Fort William (<u>Air Quality Scotland</u>). Air pollution levels at the scheme location are likely to be lower than levels at this monitoring station due to the more rural nature of the works site.

There are no sites registered on the Scottish Pollutant Release Inventory (SPRI) (<u>Scotland's Environment</u>) for air pollutant releases within 1km of the scheme.

Baseline air quality within the scheme extent is likely to be primarily influenced by trunk road traffic and marine traffic in the area.

Cultural heritage

According to Historic Environment Scotland's Pastmap (<u>Pastmap</u>), there are four features of local cultural heritage listed on Historic Environment Record (HER) or the Canmore database that are located within 300m of the scheme. The A87 Carrich Bridge itself is listed on HER as 'Skye Bridge' (HER and Canmore IDs: MHG17575 and 89241). However, it does not have a protected status. The other cultural heritage features within 300m of the scheme are all located at least 200m from the area of works and include the following:

- Plock of Kyle (HER and Canmore IDs: MHG7463 and 72657) 230m east of the scheme;
- Plock of Kyle, Kyle of Lochalsh Golf Club (Canmore ID: 351291) 290m northeast of the scheme; and
- Lady Fullerton: Plock of Kyle, Loch Alsh (HER and Canmore Maritime IDs: MHG47128 and 255813) 280m south of the scheme.

There are no Listed Buildings, Scheduled Monuments, Inventory Battlefields, Garden & Designed Landscapes, Conservation Areas, or World Heritage Sites within 300m of the scheme.

Landscape and visual effects

The scheme does not lie within any area of land designated as a National Park or National Scenic Area (<u>Scotland's Environment</u>). As the A87 Carrich Bridge spans part of the marine environment, it does not fall within a Landscape Character Type (LCT); however, the LCT adjacent to A87 Carrich Bridge to the east is Farmed and

Settled Lowlands – Skye & Lochalsh (no. 357) (Scottish Landscape Character Types). The Farmed and Settled Lowlands – Skye & Lochalsh LCT is characterised by human activity and associated land uses which contrast sharply with surrounding moorland and mountain LCTs. Land cover east of the bridge on the mainland is dominated by deciduous woodland and littoral rock along the edge of the Kyle Akin. Habitats on Eilean Ban at the west end of the bridge are dominated by littoral rock and small areas of temperate shrub heathland scheme (Scotland's Environment).

Biodiversity

Designated Sites

The A87 Carrich Bridge spans the Kyle Akin, which connects the Inner Sound northwest of the bridge with Loch Alsh to the east. This water body forms part of several designated sites, including Inner Hebrides and the Minches Special Area of Conservation (SAC), Loch Carron Nature Conservation Marine Protected Area (NC MPA), and Lochs Duich, Long and Alsh Reefs SAC and Lochs Duich, Long and Alsh NC MPA (<u>SiteLink</u>).

The Inner Hebrides and the Minches SAC is spanned by A87 Carrich Bridge (<u>SiteLink</u>).

The Lochs Duich, Long and Alsh Reefs SAC is partially adjacent to the southeastern end of A87 Carrich Bridge (<u>SiteLink</u>).

The Lochs Duich, Long and Alsh NC MPA is spanned by A87 Carrich Bridge (<u>SiteLink</u>).

The Loch Carron NC MPA is partially adjacent to the northern side of A87 Carrich Bridge (<u>SiteLink</u>).

In addition, the scheme is located approximately 2.08km north of Kinloch and Kyleakin Hills SAC (<u>SiteLink</u>).

Due to the location of the bridge which spans or is adjacent to multiple designated sites, screening for potential impacts was carried out as part of the Habitats Regulations Appraisal (HRA) process and consultation with NatureScot was undertaken to determine whether the proposed works could result in Likely Significant Effects (LSE) on the qualifying features of the SACs and NC MPAs.

Terrestrial Ecology

Transport Scotland's Asset Management Performance System (AMPS) does not hold any records of INNS or injurious weeds along the A87 within the vicinity of the bridge or any proposed access routes.

Geology and soils

The scheme does not lie within a Geological Conservation Review Site (GCRS) (<u>SiteLink</u>).

Baseline data on geology and soils has been obtained from the British Geological Society's Geology Viewer (<u>BGS Geology Viewer (BETA)</u>) and Scotland's Environment map (<u>Scotland's Soils - soil maps</u>).

Bedrock geology is not recorded within the scheme extent; however, bedrock on the mainland east of the bridge and on Eilean Ban to the west is recorded as Applecross Formation (sandstone), which is a sedimentary bedrock. Superficial geology is not recorded within the scheme extent; however, the nearest superficial deposits (east of the bridge) are recorded as Marine Beach Deposits (gravel, sand and silt), which are sedimentary deposits.

Soils within the scheme extent are recorded as peaty gleys.

As a result of the works taking place strictly within the existing man-made footprint, it has been determined that the proposed project does not carry the potential to cause direct or indirect impact to geology or soils. As such, impact has been assessed as being 'no change' and has been scoped out of requiring further assessment.

Material assets and waste

The proposed works on A87 Carrich Bridge are required to carry a new electricity cable across the bridge to Eilean Ban for SSE. The following materials will be used to complete the works:

- 150mm-diameter plastic ducting
- Flanged galvanised steel pipes
- Concrete

Waste materials are expected to be minimal as only a very small amount of drilling is required to run the new ducting through the bridge abutments. No other drilling, excavation, or concrete works will be required. Any waste materials produced will be contained and removed from site.

Noise and vibration

The scheme lies in a remote location west of Kyle of Lochalsh on the A87 trunk road. There are no residential or commercial properties located within 300m of the scheme; however, Otter Cottage on the western end of Eilean Ban is located approximately 400m from the western end of A87 Carrich Bridge.

The scheme is in a remote location where noise and vibration levels will be primarily influenced by trunk road traffic and marine traffic in the surrounding area. There are no designated <u>Candidate Noise Management Areas</u> or Candidate Quiet Areas within proximity to the works location.

There is no noise modelled data available for the scheme extent (<u>Scotland's Noise</u> <u>Scotland's Environment</u>).

Population and human health

The scheme lies in a remote location west of Kyle of Lochalsh on the A87 trunk road. There are no residential or commercial properties located within 300m of the scheme; however, Otter Cottage on the western end of Eilean Ban is located approximately 400m from the western end of A87 Carrich Bridge.

There are no National Cycle Network routes (<u>OS Maps</u>), core paths (<u>Scotland's</u> <u>Environment</u>), or walking routes listed on WalkHighlands (<u>WalkHighlands</u>) within the scheme extent. A paved pedestrian footpath is present along the eastbound carriageway throughout the scheme extent. There are no bus stops or other pedestrian facilities along the A87 throughout the scheme extent.

The Plock of Kyle is a community parkland owned by the Kyle and Lochalsh Community Trust which is located northeast of A87 Carrich Bridge. The access point and carpark for the Plock is approximately 360m east of the bridge, and there are nature trails within the Plock that lie within 150m of the bridge.

The A87 is a single carriageway trunk road that provides a key transport route in the northwest of Scotland between Invergarry on the A82 and Uig at the north end of the Isle of Skye. A 40-mph speed limit applies on the A87 throughout the scheme extent.

The nearest traffic count point (ID 80594) on the A87 is located approximately 800m east of the scheme (<u>Road traffic statistics</u>). Vehicle count data taken from this point in 2021 shows an Average Annual Daily Traffic (AADT) count of 4,093 motor vehicles, of which 209 were heavy goods vehicles (<u>Road traffic statistics</u>).

Road drainage and the water environment

The A87 Carrich Bridge spans the Kyle Akin, which connects the Inner Sound (ID: 200491) northwest of the bridge with Loch Alsh (ID: 200352) to the east. Loch Alsh is a coastal water body that was classified by the Scottish Environment Protection

Agency (SEPA) under the Water Framework Directive 2000/60/EC in 2020 as having an overall status of 'Good' (<u>Water Classification Hub</u>). The Inner Sound is also a coastal water body which is located just north of the bridge. It was classified by SEPA in 2020 as having an overall status of 'High' (<u>Water Classification Hub</u>).

The eastern end of the bridge lies within the Wester Ross, Assynt and Kintail Coe groundwater body, which was classified by SEPA in 2020 as having 'Good' condition (Water Classification Hub).

The A87 within the scheme extent is not at risk of flooding (SEPA Flood Map).

As the A87 Carrich Bridge spans an area seaward of Mean High Water Springs (MHWS), works on the bridge are subject to marine licence requirements. In 2019, BEAR Scotland was issued a 5-year marine licence (06777/19/0) by Marine Scotland to permit a range of maintenance works on the A87 Carrich Bridge. However, the proposed ducting works were not included on the original 5-year marine licence. Therefore, consultation with Marine Scotland was undertaken, which confirmed the need for a variation to the existing 5-year marine licence to permit ducting works.

A variation to the existing licence was granted by Marine Scotland on 31st May 2022 (MS-00009546) which permits the ducting works, in addition to the maintenance works included in the original marine licence. This licence remains valid until 15th April 2024.

Climate

The Climate Change (Scotland) Act 2009 sets out the target and vision set by the Scottish Government for tackling and responding to climate change (<u>The Climate</u> <u>Change (Scotland) Act 2009</u>). The Act includes a target of reducing CO2 emissions by 80% before 2050 (from the baseline year 1990). The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 amended the Climate Change (Scotland) Act 2009 to bring the target of reaching net-zero emissions in Scotland forward to 2045 (<u>Climate Change (Emissions Reduction Targets</u>) (Scotland) Act 2019.

The Scottish Government has since published its indicative Nationally Determined Contribution (iNDC) to set out how it will reach net-zero emissions by 2045, working to reduce emissions of all major greenhouse gases by at least 75% by 2030 (Scotland's contribution to the Paris Agreement: indicative Nationally Determined Contribution - gov.scot (www.gov.scot)). By 2040, the Scottish Government is committed to reducing emissions by 90%, with the aim of reaching net-zero by 2045 at the latest.

Transport Scotland is committed to reducing carbon across Scotland's transport network and this commitment is being enacted through the Mission Zero for Transport (<u>Mission Zero for transport | Transport Scotland</u>). Transport is the largest contributor to harmful climate emissions in Scotland. In response to the climate emergency, Transport Scotland are committed to reducing their emissions by 75% by 2030 and to a legally binding target of net-zero by 2045.

Policies and plans

This Record of Determination has been undertaken in accordance with all relevant regulations, guidance, policies and plans, notably including the Environment and Sustainability Discipline of the Design Manual for Roads and Bridges (<u>Design</u> <u>Manual for Roads and Bridges (DMRB</u>)) and Transport Scotland's Environmental Impact Assessment Guidance (<u>Guidance - Environmental Impact Assessments for road projects (transport.gov.scot</u>)).

The following policies of Scotland's National Marine Plan were considered in the applications for both the 5-year marine licence for maintenance works on A87 Carrich Bridge and the variation to the 5-year marine licence to permit ducting works on the bridge. Neither the maintenance works assessed in the 5-year marine licence application nor the proposed ducting works include any element of in-water working.

- General Policy 6 Historic environment
- General Policy 7 Landscape/seascape
- General Policy 9 Natural heritage
- General Policy 11 Marine litter
- General Policy 12 Water quality and resource
- General Policy 13 Noise
- General Policy 14 Air quality

Description of main environmental impacts and proposed mitigation

Air quality

During ducting works, there is potential for short-term negative impacts on air quality. Activities undertaken on site may cause dust and particulate matter to be emitted to the atmosphere. However, considering the nature and small scale of the works as well as the following good practice measures, the risk of significant impacts to air quality is considered to be low.

- All plant, machinery and vehicles associated with the scheme must be maintained to the appropriate standards and must switch their engines off when not in use.
- Material stockpiles will be reduced as much as reasonably practicable by using a 'just in time' delivery system. All material will also be stored on made ground (e.g. within the A87 carriageway boundary) and, where feasible, 10m away from potential pollution pathways such as drains and watercourses.
- Materials should be removed from site as soon as is practical.
- Good housekeeping will be employed throughout the work.

With the above good practice measures in place, the risk of significant effects on air quality during the construction phase is considered to be low and this receptor is not considered further in this RoD.

Cultural heritage

Of the four features of cultural heritage identified within 300m of the proposed works, the A87 Carrich Bridge itself is the only feature within 200m of works. The A87 Carrich Bridge is listed on HER and Canmore databases but does not hold a protected status. The risk of significant impacts to cultural heritage as a result of ducting works is considered to be low provided that the following good practice measures are in place.

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

With the above good practice measures in place, the risk of significant effects on cultural heritage features during the construction phase is considered to be low and this receptor is not considered further in this RoD.

Landscape and visual effects

Land use will not change as a result of the works and no land take is required. However, there is potential for minor, temporary adverse impacts during ducting works as a result of damage to roadside verges, littering, or obstructed views due to vehicles and machinery. Considering the nature and small scale of works and with the following good practice measures in place, the risk of significant impacts to land is considered to be low.

- Throughout all stages of the works, the site must be kept clean and tidy, with materials, equipment, plant and wastes appropriately stored, reducing the landscape and visual effects as much as possible.
- Works are to avoid encroaching on land and areas where work is not required or does not have permission to do so. This includes general works, storage of equipment/containers and parking.
- The site will be left clean and tidy following construction.

With the above good practice measures in place, the risk of significant effects on land during the construction phase is considered to be low and this receptor is not considered further in this RoD.

Biodiversity

Designated Sites and consultation with NatureScot

The proposed ducting works will take place on A87 Carrich Bridge, which spans Lochs Duich, Long and Alsh NC MPA and the Inner Hebrides and the Minches SAC. The bridge is also adjacent to Lochs Duich, Long and Alsh Reefs SAC and Loch Carron NC MPA and lies approximately 2km north of Kinloch and Kyleakin Hills SAC. Consequently, consultation with NatureScot was carried out to determine whether the proposed works could result in LSE on the qualifying features of these designated sites.

Kinloch and Kyleakin Hills SAC

No works will take place within the boundaries of Kinloch and Kyleakin Hills SAC, which is located over 2km south of the A87 Carrich Bridge. Therefore, works will not result in any direct or indirect impacts on the qualifying habitat features of the SAC. Standard good practice working methods for working in or near water will be in place during works and the working area will be appropriately contained to prevent loss of pollution into the water environment. Given the nature of the works, the distance

between the works and the SAC, and the good working practices that will be in place, it is highly unlikely that the works would result in LSE on the qualifying features of Kinloch and Kyleakin Hills SAC. NatureScot has agreed with this assessment and confirmed that Appropriate Assessment is not required.

Lochs Duich, Long and Alsh Reefs SAC

Ducting works will not entail any in-water works; therefore, there will be no direct impacts on the qualifying reef features in Lochs Duich, Long and Alsh Reefs SAC. NatureScot advised that there are records of rocky reefs in the vicinity of works, although other biogenic reefs in the SAC are over 400m from the bridge. However, NatureScot advised that the rocky reef type found near the bridge is more robust than other types of reefs and is less likely to be impacted by a loss of containment of the working area. Additionally, there are strong currents through the Kyle Akin water body that would quickly disperse small quantities of pollution if there was a loss of containment during works. Standard good practice working methods for working in or near water will be in place during works and the working area will be appropriately contained to prevent loss of pollution into the water environment. Given the nature of the works and the good working practices that will be in place, it is highly unlikely that the works would result in LSE on the qualifying features of Lochs Duich, Long and Alsh Reefs SAC. NatureScot has agreed with this assessment and confirmed that Appropriate Assessment is not required.

Inner Hebrides and the Minches SAC

Ducting works will not entail any in-water works; therefore, there will be no direct impacts on the qualifying feature or its supporting habitat in Inner Hebrides and the Minches SAC. The risk of disturbance is very low considering the nature of the works and the species are highly mobile. Standard good practice working methods for working in or near water will be in place during works and the working area will be appropriately contained to prevent loss of pollution into the water environment. In addition, there are strong currents through the Kyle Akin water body that would quickly disperse small quantities of pollution if there was a loss of containment during works. Given the nature of the works, the high mobility of the species, and the good working practices that will be in place, there is no pathway to LSE on the qualifying feature of Inner Hebrides and the Minches SAC. NatureScot has agreed with this assessment and confirmed that Appropriate Assessment is not required.

Lochs Duich, Long and Alsh NC MPA

Ducting works will not entail any in-water works; therefore, there will be no direct impacts on the qualifying marine features in Lochs Duich, Long and Alsh NC MPA. NatureScot advised that the nearest records in Lochs Duich, Long, and Alsh NC MPA are over 300m from A87 Carrich Bridge. Additionally, there are strong currents through the Kyle Akin water body that would quickly disperse small quantities of pollution if there was a loss of containment during works. Standard good practice working methods for working in or near water will be in place during works and the working area will be appropriately contained to prevent loss of pollution into the

water environment. Given the nature of the works, the distance of the sensitive marine features from the scheme, and the good working practices that will be in place, there is no pathway to LSE on the qualifying features of Lochs Duich, Long and Alsh NC MPA. NatureScot has agreed with this assessment and confirmed that Appropriate Assessment is not required.

Loch Carron NC MPA

Ducting works will not entail any in-water works; therefore, there will be no direct impacts on the qualifying marine features in Loch Carron NC MPA. NatureScot advised that the nearest records within Loch Carron NC MPA are over 600m from the bridge. Additionally, there are strong currents through the Kyle Akin water body that would quickly disperse small quantities of pollution if there was a loss of containment during works. Standard good practice working methods for working in or near water will be in place during works and the working area will be appropriately contained to prevent loss of pollution into the water environment. Given the nature of the works, the distance of the sensitive marine features from the scheme, and the good working practices that will be in place, there is no pathway to LSE on the qualifying features of Loch Carron NC MPA. NatureScot has agreed with this assessment and confirmed that Appropriate Assessment is not required.

Good practice measures for designated sites

Standard working practices for working in or near water will be in place during works to comply with The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended), which are described further in the 'Road drainage and the water environment' section below. These and other good practice measures (listed below) will be in place during works to reduce the risk of impacts to the qualifying features of the above designated sites. Therefore, there is limited potential for indirect impacts on these features as a result of disturbance or pollution. Consultation with NatureScot confirmed that the works would not result in LSE on the qualifying features of the designated sites, given the nature of the works and provided that the following good practice measures are in place:

- No in-water works will take place.
- Works are to be strictly limited to areas required for access and ducting works. Unnecessary encroachment onto terrestrial or aquatic areas will not be tolerated.
- No discharges into any water bodies or drainage systems are permitted.
- Appropriate containment measures must be in place to prevent any loss of construction materials into the water environment.
- The standard working practices for working in or near water as described in the 'Road drainage and the water environment' section below will be adhered to during works.

Terrestrial mammals and nesting birds

There is potential for the works to result in impacts on terrestrial species (depending on the timing of works). There is also suitable habitat for nesting birds in the vicinity of the bridge.

There is suitable habitat for nesting birds present on site. If works will commence during the breeding bird season (March to August inclusive), checks for nesting birds will be carried out prior to works. All site staff will receive a toolbox talk on nesting birds prior to works commencing and will be informed to stop works if an active bird nest is identified in the nearby area. With these and the below good practice measures in place, the risk of significant impacts on nesting birds as a result of works is considered to be low.

- A pre-construction species survey will be carried out prior to works to identify any new active resting places in the vicinity of the bridge.
- Toolbox talks on protected species and breeding birds will be provided to all site staff prior to works commencing.
- Checks for nesting birds will be carried out prior works commencing.
- If an active bird nest (e.g., eggs or young present, adult sitting on nest) is identified in the vicinity of works, all works within 30m must stop until the BEAR Scotland NW Environment Team can provide advice.
- Where protected mammals are encountered or move within 50m of the active works, works will cease until the animal(s) move at least 50m away from the construction site or until the BEAR Scotland NW Environment Team can provide advice.
- All material, machinery, and equipment will be subject to checks for resting mammals daily prior to any works commencing to prevent entrapment or injury of any mammals.
- A 'soft start' will be implemented on site each day. This will involve switching on vehicles and checking under/around vehicles and the immediate work area for mammals prior to works commencing to ensure none are present and that there is a gradual increase in noise.
- Any excavations, exposed pipes/drains, or areas where an animal could become trapped (e.g., storage containers) will be covered over when not in use, at the end of each shift, and following completion of works to avoid mammals falling in and becoming trapped.
- Suitable passage under the bridge must be maintained for the duration of works.
- If fencing is utilised at any point during works, a gap of 200mm from ground level must be provided, allowing free passage for mammals and preventing entrapment.

• Artificial lighting will be directed away from water bodies, coastline, vegetation, or other suitable habitat as much as is safe and reasonably practicable.

Based on the above consultation with NatureScot and survey data and provided that the above good practice measures and any additional mitigation measures identified (detailed in the SEMP) are adhered to during works, any impacts on the 'Biodiversity' receptor resulting from the proposed ducting works at A87 Carrich Bridge are expected to be minor, temporary, and not significant. This receptor is not considered further in the RoD.

Material assets and waste

There is potential for impacts as a result of resource depletion through use and transportation of new materials. However, materials will be sourced locally where possible. With the following good practice measures in place, significant impacts on material assets are not anticipated as a result of works:

- Materials will be sourced from recycled origins as far as reasonably practicable within design specifications.
- Care will be taken to order the correct quantity of required materials to prevent the disposal of unused materials.
- Where possible, minimal packaging should be requested on required deliveries to reduce unnecessary waste and production of packaging materials.

During ducting works, there is potential for impacts as a result of the improper storage or disposal of waste. However, provided the following good practice measures are in place, the risk of significant impacts as a result of the works is considered to be low.

- The waste hierarchy (Reduce, Reuse, Recycle and Dispose) will be employed throughout the construction works.
- The subcontractor will adhere to waste management legislation and ensure they comply with their Duty of Care.
- Containment measures will be in place to prevent debris or pollutants from entering the surrounding environment.
- All wastes and unused materials must be removed from site in a safe and legal manner by a licensed waste carrier upon completion of the works. The appointed waste carrier must have a valid SEPA waste carrier registration, a copy of which will be provided to and retained by BEAR Scotland as early as possible.
- All appropriate waste documentation must be present on site and be available for inspection. A copy of the Duty of Care paperwork should be provided and filed appropriately in accordance with the Code of Practice (as made under Section 34 of Environmental Protection Act 1990 as amended).
- Re-use and recycling of waste will be encouraged and the subcontractor will be required to fully outline their plans and provide documentary evidence for waste

arising from the works (e.g. waste carrier's licence, transfer notes, and waste exemption certificates).

- Staff will be informed that littering will not be tolerated. Staff will be encouraged to collect any litter seen on site.
- Where applicable, all temporary signage will be removed from site on completion of the works.
- Any special waste should be removed from site by a licenced waste carrier. Special waste should not be mixed with general waste and/or other recyclables. Any contaminated ground as a result of the works should be removed and transferred off site as special waste.

With the above good practice measures in place, the risk of significant effects on the environment due to use of materials and waste produced during the construction phase is considered to be low and this receptor is not considered further in this RoD.

Noise and vibration

During ducting works, activities undertaken on site may have temporary adverse impacts on road users as a result of vehicle noise and delays due to traffic management measures. The works are currently anticipated to take place overnight; however, the programme has not been finalised and works may be carried out during daylight hours. Considering the nature and small scale of the works and with the following good practice measures in place, the risk of significant impacts on population and human health is considered to be low.

- There are no properties located within 300m of the scheme and the works will facilitate electricity provision to Otter Cottage, located 400m from the works.
- The Best Practicable Means, as defined in Section 72 of the Control of Pollution Act 1974 and BS5228-1:2009+A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites, will be employed at all times during works.
- If night works are required, the Environmental Health Officer (EHO) for Highland Council will be notified of works. Residents in the holiday cottage on Eilean Ban will also be consulted and provided with a 24-hour contact number for the BEAR Scotland Control Room.
- On-site construction tasks should be programmed to be as efficient as possible, with a view to limiting noise disruption to local sensitive receptors.
- Good practice measures to reduce noise and vibration disturbance from works will be detailed in the SEMP and adhered to on site.

With the above good practice measures in place, the risk of significant effects on population and human health during the construction phase is considered to be low and this receptor is not considered further in this RoD.

Population and human health

During ducting works, activities undertaken on site may have temporary adverse impacts on road users as a result of vehicle noise and delays due to traffic management measures. However, the works will be publicised to inform road users of construction dates and time. In addition, the works will move progressively along the full scheme extent. Considering the nature and small scale of the works and with the following good practice measures in place, the risk of significant impacts on population and human health is considered to be low.

- There are no properties located within 300m of the scheme and the works will facilitate electricity provision to Otter Cottage, located 400m from the works.
- A traffic management plan will be developed in accordance with Chapter 8 of the Traffic Signs Manual to reduce disruption to vehicle travellers. Traffic management is required for safe access to the site and is expected to consist of a single lane closure that will be removed/reinstated at the end/start of each work shift.
- Journey planning information will be available for drivers online at the trafficscotland.org website. Journey planning information will also be available for drivers online through BEAR's social media platforms.
- Traffic management will include appropriate provisions for non-motorised users (NMUs) of the road such as pedestrians and cyclists who may take longer than motorised vehicles to travel the length of the traffic management.
- Good practice measures to reduce noise and vibration disturbance from works will be detailed in the SEMP and adhered to on site.

With the above good practice measures in place, the risk of significant effects on population and human health during the construction phase is considered to be low and this receptor is not considered further in this RoD.

Road drainage and the water environment

Ducting works will not entail any in-water works; however, the A87 Carrich Bridge spans an area seaward of MHWS. Therefore, consultation with Marine Scotland was carried out to determine whether a variation to BEAR Scotland's existing 5-year marine licence (06777/19/0) would be required to permit the proposed works, as the ducting works were not included on the original 5-year marine licence. Marine Scotland confirmed that a variation to this licence would be required and later advised that validation of the Appropriate Assessment completed for the 5-year marine licence would be undertaken. A variation to the 5-year marine licence was granted by Marine Scotland on 31st May 2022 (MS-00009546) which permits the ducting works, in addition to the maintenance works included in the original marine licence. This licence remains valid until 15th April 2024.

As ducting works will not entail any in-water works, the potential for impacts on the water environment is limited to pollution due to loss of containment of the working

area. However, works will either be carried out using a MEWP with underbridge extension capabilities or via a portable scaffold unit suspended over the side of the bridge. Both of these options will have containment measures in place (e.g., debris netting, sheeting) to prevent any loss of construction materials into the water environment. The new ducting will be bolted to existing channels in the soffit of the footway using mechanical fixings. Therefore, drilling into the concrete of the bridge is not required and concrete dust or other particular matter will not be created during works.

Standard working practices to comply with The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) for works in or near water will be detailed in the SEMP and adhered to on site. These measures include the following:

- All conditions of the marine licence (06777/19/0) and variation (MS-00009546) issued by Marine Scotland must be complied with. A copy of the marine licence and variation will be retained on site and made available for inspection as required.
- All conditions of SEPA's General Binding Rules (GBR) 9 will be adhered to during works (<u>car_a_practical_guide.pdf (sepa.org.uk)</u>).
- Pollution control measures, including relevant SEPA Pollution Prevention Guidelines (PPGs) and Guidance for Pollution Prevention (GPPs), as well as other good practice measures for working in or near water, will be detailed in the SEMP and adhered to on site to prevent materials or pollutants entering the water environment.
- The scheme will not entail any in-water works.
- No discharges into any watercourses or drainage systems are permitted and appropriate containment measures must be in place to prevent any loss of construction materials or pollutants into the water environment.
- The subcontractor is required to produce an incident response plan for dealing with spills or environmental incidents. The incident response (contingency) plan will be put in place to minimise the risk from pollution incidents or accidental spillages. All necessary containment equipment, including suitable spill kits (for oil and chemicals) will be available on site, quickly accessible if needed, and staff trained in their use.
- Standard good practice measures for working in or near water will be detailed in the SEMP and adhered to on site for the duration of works.

With the above good practice measures and licences in place, the risk of significant effects on road drainage and the water environment during the construction phase is considered to be low and this receptor is not considered further in this RoD.

Climate

Construction activities associated with the proposed works have the potential to cause local air quality impacts as a result of the emission of greenhouse gases through the use of vehicles and machinery, material use and production, and transportation of materials to and from site. However, considering the nature and small scale of the works as well as the following good practice measures, the risk of significant impacts to climate is considered to be low.

- BEAR Scotland will adhere to the company's Carbon Management Policy.
- Works are currently anticipated to be carried out overnight. However, works will be undertaken utilising a daytime work pattern if possible to reduce the requirement for additional lighting.
- BEAR Scotland will undergo CEEQUAL Assessment.
- Where possible, construction operatives will be encouraged to car-share, used organised company transport or public transport, reducing greenhouse gas emissions.
- All plant, machinery and vehicles associated with the scheme must be maintained to the appropriate standards and must switch their engines off when not in use to reduce and control emissions.
- Where possible, materials are to be sourced locally to reduce greenhouse gas emissions associated with materials movement.

With the above good practice measures in place, the risk of significant effects on the climate during the construction phase is considered to be low and this receptor is not considered further.

Major Accidents and Disasters

The A87 within the scheme extent is not at risk of flooding.

Works are restricted to made ground within the A87 carriageway and traffic management will be designed in line with existing guidance. The proposed works are anticipated to last for 2-3 weeks and are currently anticipated to be completed overnight. Traffic management will consist of a lane closure with temporary traffic lights in place. Where required, alternative pedestrian routes will be included in the TM setup to reduce impacts of the works on NMUs.

These measures, along with mitigation measures and standard working practices, will be detailed in the SEMP and adhered to on site. Therefore, the vulnerability of the project to risk is considered to be low.

Assessment cumulative effects

A search of the Highland Council Planning Portal showed several planning applications for minor changes to properties within the settlements of Kyle of Lochalsh (approximately 1km east of the scheme) and Kyleakin (approximately 1km south of the scheme) (Highland Council Planning Portal). An application made by MOWI for use and storage of Liquified Natural Gas (LNG) approximately 1.8km southwest of the scheme has not yet been decided. Finally, the Highland Council issued an Environmental Impact Assessment (EIA) scoping response to SSE on a proposal to construct an overhead transmission line between Fort Augustus and Skye (known as the Skye Reinforcement Project), which is proposed to run approximately 2.8km south of the scheme at the nearest point. This project will undergo an EIA prior to construction.

A search of the Scottish Roads Works Commissioner website (<u>Map Search</u>) has identified that no other roadworks are currently ongoing, or noted as being planned, on the A87 trunk road at the same time as this scheme. Due to the nature of the proposed works, no cumulative effects are anticipated with any other developments in the vicinity.

BEAR Scotland programme all of their proposed works in line with appropriate guidance and contractual requirements. All schemes are programmed to take into account existing and future planned works, with a view of limiting any cumulative effects relating to traffic management. As a result of this exercise, where a potential for cumulative impacts is identified, BEAR will reprogramme schemes to avoid / limit any cumulative effects or will utilise existing traffic management to complete multiple schemes at once. This approach allows BEAR Scotland to effectively manage the potential cumulative effects as a result of traffic management, resulting in minimal disruption to users of the Scottish trunk road network. Overall, it is unlikely that the proposed works will have a significant cumulative effect with any other future works in the area.

Considering the small scale of the proposed ducting works at A87 Carrich Bridge, the risk of in-combination or cumulative impacts on environmental receptors in regard to the above proposed projects is low.

Assessments of the environmental effects

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

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

This is a relevant project in terms of section 55A(16) of the Roads (Scotland) Act 1984 as it is a project for the improvement of a road and the completed works (together with any area occupied by apparatus, equipment, machinery, materials, plant, spoil heaps, or other such facilities or stores required during the period of construction) are situated in whole or in part in Inner Hebrides and the Minches SAC and has connectivity to Lochs Duich, Long, and Alsh Reefs SAC, which are sensitive areas within the meaning of regulation 2(1) of the Environmental Impact Assessment (Scotland) Regulations 1999.

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

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

Characteristics of the scheme

- The total working area is less than 1 ha.
- The works will be temporary, localised, and short-term.
- Works are currently programmed to be completed during night-time hours, when the traffic count is at its lowest levels.
- The works will not damage or alter the footprint of the A87 Carrich Bridge.
- Containment of the working area will be in place to prevent debris or pollutants from entering the surrounding environment.
- Works are not expected to result in significant disturbance to protected species that may be present in the wider area.
- A pre-construction species survey will be undertaken and pre-construction nesting bird checks will be undertaken if works will commence during the breeding bird season (March to August inclusive).
- No in-combination effects have been identified.
- The risk of major accidents or disasters is considered to be low.

Location of the scheme

- Although the works lie within the boundary of Inner Hebrides and the Minches SAC and has connectivity to other designated sites, the HRA assessment and consultation with NatureScot concluded that works would not result in LSE on the qualifying features of the designated sites and that Appropriate Assessment was not required.
- The scheme is located in a rural area distant from businesses and residential properties.
- Land use will not change as a result of the works.
- The site compound will be located on made ground.
- The works will not result in altered views from the A87, and minor impacts to view during the construction phase will be temporary and short-term.

Characteristics of potential impacts of the scheme

- Any potential impacts of the works are expected to be temporary, short-term, and limited to the construction phase.
- A variation to BEAR Scotland's 5-year marine licence (06777/29/0) for A87 Carrich Bridge was granted by Marine Scotland on 31st May 2022 (MS-00009546) which permits the ducting works, in addition to the maintenance works included in the original marine licence. This licence remains valid until 15th April 2024.
- Measures will be in place to ensure appropriate removal and disposal of waste.
- The SEMP will include plans to address environmental incidents.
- No impacts on the environment are expected during the operational phase as a result of works.
- Good practice measures detailed above and in the SEMP will ensure no significant negative impacts on sensitive receptors.

Annex A

"sensitive area" means any of the following:

- land notified under sections 3(1) or 5(1) (sites of special scientific interest) of the Nature Conservation (Scotland) Act 2004
- land in respect of which an order has been made under section 23 (nature conservation orders) of the Nature Conservation (Scotland) Act 2004
- a European site within the meaning of regulation 10 of the Conservation (Natural Habitats, &c.) Regulations 1994
- a property appearing in the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention for the Protection of the World Cultural and Natural Heritage
- a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979
- a National Scenic Area as designated by a direction made by the Scottish Ministers under section 263A of the Town and Country Planning (Scotland) Act 1997
- an area designated as a National Park by a designation order made by the Scottish Ministers under section 6(1) of the National Parks (Scotland) Act 2000.



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