



TRANSPORT
SCOTLAND
CÒMHDHAIL ALBA

Environmental Impact Assessment Record of Determination

A828 South of Ballachulish Hotel

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Project Details

Description

BEAR Scotland has been commissioned by Transport Scotland to carry out resurfacing works on a stretch of the A828 carriageway south of Ballachulish.

Surface course throughout the site is exhibiting signs of fatigue (such as fretting, stripping and cracking), and as such these works are required to maintain the safety and integrity of the A828 carriageway at this location.

The construction work will involve replacement of old and deteriorating surface course over an approximate 1,022m length of the carriageway utilising a 110/120mm inlay. The scheme covers an approximate area of 6,132m² (0.61ha).

The resurfacing procedure is as follows:

- Set up traffic management (TM) and mark out site
- Mill out old surface course
- Lay new surface course
- Roll surface and allow it to go off
- Mark out lining schedule on site
- Remove TM and open road
- Lining/studding may be carried out at a later date under mobile TM or lane closures

The works are currently programmed to be completed within the 2022/2023 financial year (January 2023 to March 2023 inclusive). However, works may be delayed into the first half of the 2023/2024 financial year (April to September 2023 inclusive). Works are expected to be completed over ten nights by utilising night-time working hours (19:00 – 06:00); however, changes in the programme may result in the need for day works.

Traffic management (TM) will consist of single lane road closures, facilitated by two-way temporary traffic lights (TTLs) and a convoy system. However, if the programme changes, this may result in amendments to the exact TM requirements. Where required, alternative pedestrian routes will be included in the TM setup.

Location

The works are located on the A828 carriageway between North and South Ballachulish, within the Highland council area (Figure 1). The scheme has the following National Grid References (NGRs):

- Scheme Start: NN 04954 59602
- Scheme End: NN 04115 59477

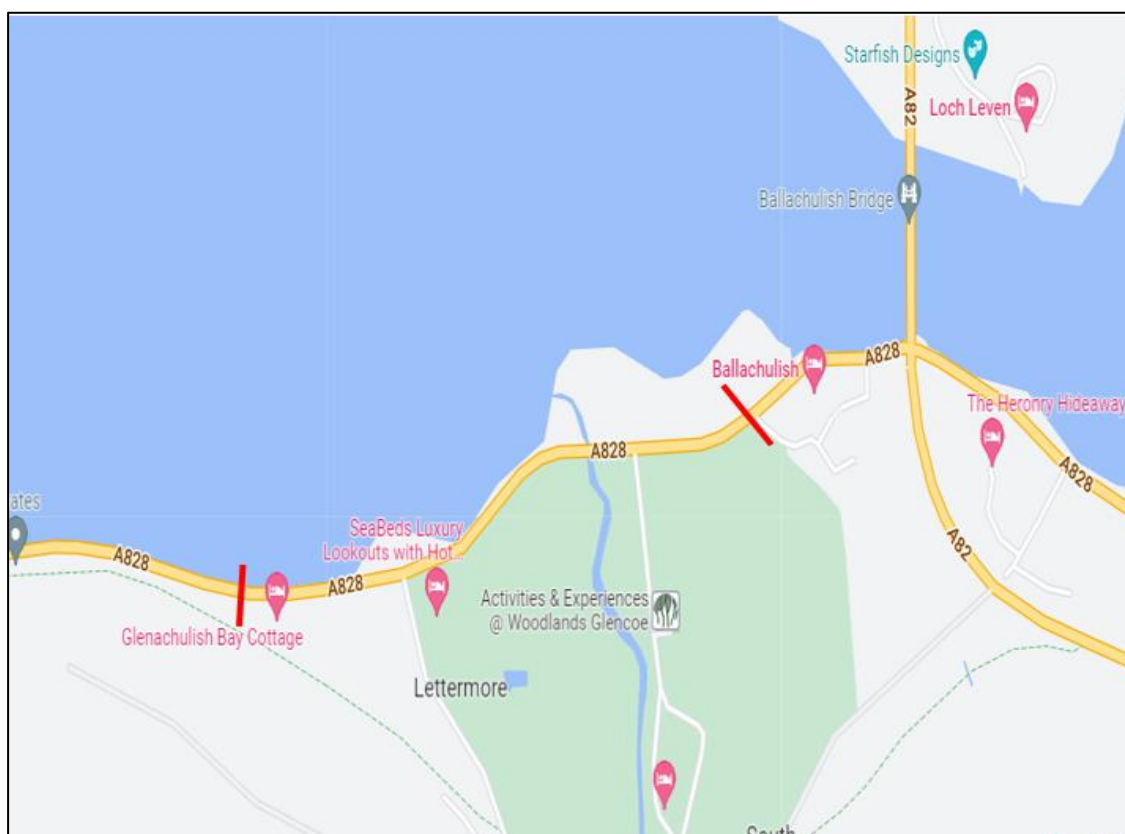


Figure 1. Location and scheme extent of the proposed resurfacing works at A828 South of Ballachulish. Source: BEAR Scotland. F108 – Environmental Assessment Request (Scheme ref: 22/NW/0103/035).

Description of local environment

Air quality

The works are located in the rural setting of the Highland Council, between North and South Ballachulish, surrounded mostly by woodland and coastal features, with intermittent residential and commercial properties.

There are several residential properties within 300m of the works, with the closest residential property located less than 5m from the southbound (SB) carriageway at the southern scheme extent.

The Highland Council has declared one [Air Quality Management Area](#) (AQMA) within Inverness city centre. This AQMA scheme does not fall within proximity to the works. No [Air Quality Monitoring Stations](#) are located in the vicinity of works; the nearest air quality monitoring station is located in Fort William, approximately 15km north of the scheme. Pollution levels in the general vicinity of works are anticipated to be lower than those at the monitoring station in Fort William due to the remote nature of the scheme location.

No sites registered on the [Scottish Pollutant Release Inventory](#) (SPRI) for air pollutant releases are located within proximity of the scheme. The closest SPRI site is located approx. 2.8km east of the scheme. Details of the site are as follows:

- Callert Marine Cage Fish Farm (intensive livestock production and aquaculture), which lies within Loch Leven.

[Average Annual Daily Flow](#) (AADF) for the A828 carriageway (taken from a count point at Achindarroch, approximately 6.2km south of the scheme extent) accounted for 2,410 vehicles, with an average of 6.2% heavy goods vehicle (HGV).

Baseline air quality at the scheme location is likely to be primarily influenced by traffic along the A828 trunk road.

Cultural heritage

A desktop study using [PastMap](#) has identified the following features of cultural heritage within 300m of the works:

- 'Ballachulish Hotel' (ID: LB6881), a Category B Listed Building, located approx. 50m north east of the scheme. This feature is also recorded on the Canmore and Historic Environment Record (HER) databases.
- 'Ballachulish Home Farm, Burial Mound SW Of Ballachulish Hotel' (ID: SM4166), a Scheduled Monument located approx. 40m south of the scheme. The monument comprises a prehistoric burial mound, probably of Bronze Age date.
- Eleven features listed on the Canmore database; the closest of which is located approx. 10m south of the scheme.
- Six features listed on the HER database; the closest of which is located approx. 60m south of the scheme.

There are no World Heritage Sites, Conservation Areas, Garden and Designed Landscapes or Inventory Battlefields identified within 300m of the scheme.

Landscape and visual effects

This scheme is located entirely within [Ben Nevis and Glen Coe National Scenic Area \(NSA\)](#) which is designated for the following special qualities:

- A land of mountain grandeur
- A land of classic highland vistas
- Human settlement dwarfed by mountain and moorland
- The expansive Moor of Rannoch
- The spectacular drama of Glen Coe
- The wooded strath of lower Glen Coe
- The narrow and enclosed Loch Leven
- The impressive massif of Ben Nevis
- The wild Mamores and secretive Glen Nevis
- The fjord-like upper Loch Leven
- Long and green Glen Etive
- The dark heritage

No further areas designated for landscape character exist within 300m of the works.

The [Landscape Character Type](#) (LCT) within the scheme extent is categorized as 'Lochs with Settled Edges' (no. 234), which is characterised by:

- Flat landscape contained between steep loch sides and open water.
- Extensive agriculture and settlement confined within a narrow lochside fringe, whose foreshore is subject to tidal influence.
- Loch heads and river mouths that permit more extensive farming and built development, including housing and small industrial estates.
- Communications confined to narrow loch edges where shingly beaches, rocky headlands, wooded banks and marshy platforms form a diverse water's edge.
- Extensive tracts of oak-birch woodland climbing from the lochside up into the foothills, often engulfing the settled edge and providing an enclosed microlandscape.

- Dense commercial forests descend to loch shore in some locations.
- Occasional policy grounds of big houses along the loch edge give rise to a proliferation of rhododendron and other ornamentals in some places, providing a lush and sheltered character.
- Linearly arranged crofting communities with vivid green croft fields contrast with the more subdued duller colours of surrounding hills.

Historic Environment Scotland's [HLAMap](#) has highlighted the surrounding landscape to consist of a combination of managed woodland, fields and farmland, and a golf course.

Biodiversity

The works are located in a rural setting within the Highland Council area, surrounded by areas of woodland and coastal features associated with the adjacent Loch Linnhe.

A desktop study using [Nature Scot SiteLink](#) has identified Glen Etive and Glen Fyne Special Protection Area (SPA) (Site Code: 10113) located approx. 310m west of the scheme.

The NBN Atlas holds records of the following invasive non-native species (INNS) of plants (denoted by *) and injurious weeds under the same criteria:

- Broad-leaved dock (*Rumex obtusifolius*)
- Creeping thistle (*Cirsium arvense*)
- Curled dock (*Rumex crispus*)
- Rhododendron (*Rhododendron ponticum*)*
- Rosebay willowherb (*Chamaenerion angustifolium*)
- Spear thistle (*Cirsium vulgare*)

Three of the above listed plant species are located in an area of northbound (NB) verge within the scheme extent (rhododendron, curled dock, and rosebay willowherb). In addition, Transport Scotland's Asset Management Performance System (AMPS) does not hold any records of INNS along the A828 throughout the scheme extent, however there are records of rosebay willowherb within, and either side of, the scheme extent.

Habitats to the east and west of the scheme are typically dominated by areas of mixed coniferous and broadleaved woodland. A managed recreational area including

a golf course is located south of the scheme, and Loch Linnhe is located immediately north of the scheme, which provides some coastal habitats in the surrounding area.

There are three areas of woodland listed on the [Ancient Woodland Inventory \(AWI\)](#) within 300m of the scheme; two categorised as Ancient (of semi-natural origin) and one categorised as Long-Established (of plantation origin). The closest area of woodland is located on the SB carriageway immediately adjacent to the A828 carriageway.

A desktop study has been deemed sufficient for this assessment, and no ecological surveys have been carried out.

Geology and soils

The scheme does not lie within a [Geological Conservation Review Site](#) (GCRS) or geological [Site of Special Scientific Interest](#) (SSSI). There are also no Local Geodiversity Sites (LGS) with connectivity to the scheme extents ([SiteLink](#)).

The [National Soil Map of Scotland](#) has identified the local soil type as humus-iron podzols.

A desktop study using the [British Geological Survey Map](#) identifies the local geology type as the following:

- Bedrock Geology: Leven Schist Formation (Semipelite, quartzite and pelite), which is a metamorphic bedrock.
- Superficial Deposits: Raised Marine Deposits, Devensian (gravel, sand, and silt) which are sedimentary deposits.

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 are required to resurface the worn carriageway and reinstate road markings. Materials used will consist of:

- Asphaltic material

- Road-marking paint
- Bituminous emulsion bond coat
- Milled in road studs

Wastes are anticipated to be planings from the carriageway surface course, which will be fully recovered for re-use in line with BEAR Scotland's Procedure 126: The Production of Fully Recovered Asphalt Road Planings.

The Contractor is responsible for the disposal of road planings and this has been registered in accordance with a Paragraph 13(a) waste exemption issued by SEPA, as described in Schedule 3 of the Waste Management Licensing Regulations 2011 (exemption number WML/XS/2004384).

It is not yet known if the works will encounter coal tar contaminated road surfacing.

Noise and vibration

The works are located in a rural coastal setting between North and South Ballachulish, surrounded by woodland, coastal features, and managed recreation areas (golf course).

Several properties, including both residential and commercial accommodation, are located within 300m of the works, spread intermittently throughout the full scheme extent. The nearest residential property is located less than 5m from the SB carriageway at the southern scheme extent. Ballachulish Hotel is located adjacent to the SB carriageway at the northern scheme extent. No acoustic screening features are present between the A828 and several of these properties.

[Average Annual Daily Flow](#) (AADF) for the A828 carriageway (taken from a count point at Achindarroch, approximately 6.2km south of the scheme extent) accounted for 2,410 vehicles, with an average of 6.2% HGV. Baseline noise conditions at this location are likely influenced primarily by traffic travelling along the A828, and additionally by noise associated with nearby recreational land uses.

The works do not fall within a [Candidate Noise Management Area](#) (CNMA) as defined by the Transportation Noise Action Plan (Road Maps).

There is no [noise modelled data](#) available for the scheme extent.

Population and human health

The A828 Trunk Road connects Connel with South Ballachulish. It commences at the A828 / A85 junction in Connel leading generally north-eastwards for a distance of

51 kilometres to its junction with the A82 in South Ballachulish. The A828 is a single carriageway along its length. The national speed limit applies throughout the scheme.

Three large layby/parking areas are located in proximity; one located adjacent to the SB carriageway within the scheme extent, and two located adjacent to both the NB and SB carriageways immediately north of the scheme.

A section of the [National Cycle Network \(NCN\) route 78](#), 'The Caledonia Way', travels parallel to the SB A828 carriageway at the southern scheme extent (20m at its nearest point). This is also used as a paved pedestrian footpath and is designated as a [Core Path](#) (ID: 4533). An additional Core Path (ID 16593) meets the A828 carriageway within the scheme extents, at the Glenachulish Road junction. There are no walking routes listed on [WalkHighlands](#) in proximity to the A828 within the scheme extent.

One bus stop is located on the SB carriageway at the Glenachulish Road junction, serviced by [Shiel Buses](#) service number 144.

Several access points are located within the scheme extents, which give access to residential properties, in addition to the local road network, recreational areas, and holiday cottages/hotels.

Various walking/hiking trails, and popular destinations within the Highlands lie within proximity of the scheme, such as Glencoe Mountain Resort which is located approx. 4km to the east. The area is likely to attract tourists and outdoor recreationists.

Road drainage and the water environment

A desktop study using the Scottish Environment Protection Agency (SEPA) [River Basin Management Plan Interactive Map](#) has identified Loch Linnhe (South) (ID: 200081), which lies to the northwest of the A828 throughout the scheme extent (10m at its nearest point). Loch Linnhe (South) is a coastal waterbody which has been classified by the Scottish Environment Protection Agency (SEPA) under the Water Framework Directive 2000/60/EC (WFD) in 2020 as having an overall status of 'Good' and is 148.7km² in area.

Abhainn Greadhain and two minor watercourses/field drains are culverted below the A828 carriageway within the scheme extent, outflowing into Loch Linnhe. These watercourses are unclassified by SEPA.

The scheme falls within the 'Kinlochleven' groundwater body which was classified by SEPA in 2021 as having an overall status of 'Good'.

The A828 carriageway within scheme extents is in an area at high risk of surface, coastal and river water flooding (each year this area has a 10% chance of flooding), as displayed on the [SEPA Flood Map](#).

Climate

[The Climate Change \(Scotland\) Act](#) sets out the target and vision set by the Scottish Government for tackling and responding to climate change. 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.

The Scottish Government has since published its indicative [Nationally Determined Contribution](#) (iNDC) to set out how it will instead reach net-zero by 2045, working to reduce emissions of all major greenhouse gases (GHG) by at least 75% by 2030. By 2040, the Scottish Government is committed to reduce 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, this commitment is being enacted through the [Mission Zero for Transport](#). Transport is the largest contributor to harmful climate emissions in Scotland. In response to the climate emergency, TS 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](#) (DMRB) and Transport Scotland's [Environmental Impact Assessment Guidance](#).

Description of main environmental impacts and proposed mitigation

Air quality

Construction activities associated with the proposed works have the potential to temporarily cause local air quality impacts. Activities undertaken on site and use of TM may cause dust and particulate matter to be emitted to the atmosphere, and the use of vehicles, plant and generators emitting carbon emissions may temporarily affect air quality and will require the use of finite resources. However, taking into account the nature and scale of the works and the following mitigation measures, the risk of significant impacts to air are considered to be low.

- When not in use plant and vehicles will be switched off; there will be no idling vehicles.
- All plant and fuel-requiring equipment utilised during construction shall be well maintained in order to minimise emissions, as per manufacturing and legal requirements.
- Green driving techniques will be adopted, and effective route preparation and planning shall be undertaken prior to works.
- All delivery vehicles carrying material with dust potential will be covered when travelling to or leaving site, preventing the spread of dust beyond the work area.
- Material stockpiles will be reduced as far as is reasonably practicable by using a 'just in time' delivery system. All material will also be stored on made ground.
- Any stockpiled material on site will be monitored daily to ensure no risks of dust emissions exists.
- Materials shall be removed from site as soon as is practicable.
- Good housekeeping will be employed throughout the work.
- Drop heights to haulage vehicles and onto conveyors will be minimised.
- Surfaces will be swept where loose material remains following planing.

With the above mitigation measures in place, it is anticipated that any air quality effects associated with the proposed works are unlikely to be significant. This receptor is not considered further in this Record of Determination (RoD).

Cultural heritage

The proposed works are not anticipated to have an adverse impact on cultural heritage as the works will be restricted to made ground within the A828 carriageway boundary and involve like-for-like replacement of the road surfacing material. There are no recorded features of cultural heritage within the works footprint. The following good practice measures will be in place to reduce the risk of impacts to undiscovered features of cultural heritage interest:

- Should any unexpected archaeological evidence be discovered, works will stop temporarily in the vicinity and the BEAR Scotland Environment Team contacted for advice.
- People, plant, and materials shall, 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 shall be reduced as far as is reasonably practicable and will ideally be limited to access on foot. There shall be no storage of vehicles, plant, or materials against any buildings, walls or fences.

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

Landscape and visual effects

There is potential for minor, temporary visual impacts to the local landscape during the construction phase as a result of littering or obstructed views due to vehicles and machinery. However, proposed works will be restricted to A828 carriageway and land use will not change as a result of the works. In addition, the following mitigation measures will be put in place during works:

- Throughout all stages of the works, the site will be kept clean and tidy, with materials, equipment, plant and wastes appropriately stored, reducing the landscape and visual effects as much as possible.
- The working area and site compound location will be appropriately reinstated following works.
- Works will 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.
- Where applicable, upon completion of the works, any damage to the local landscape shall be reinstated as much as is practicable.

- The site will be left clean and tidy following construction.

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

Biodiversity

During road resurfacing, activities undertaken on site could potentially have a temporary adverse impact on biodiversity in the area as a result of an increased vehicle presence and the potential for disturbance to protected species and pollution of habitats.

The scheme is located approx. 310m from Glen Etive and Glen Fyne SPA. The high-level Habitats Regulations Appraisal (HRA) concluded that the works would not result in any likely significant effects (LSE) on the qualifying features, as works are currently programmed to be undertaken in the winter period (January) which is out with the breeding/fledging season where bird species would be most susceptible to any disturbance (visual or acoustic). Disturbance is also not predicted in the event that works are postponed to within the breeding/fledging season, as the works are sufficiently distanced from the SPA, and extensive acoustic/visual screening is present. In addition, all work will be restricted to the footprint of the A828 trunk road and will not involve any change of the natural landscape or its processes and, given the highly rural location of the scheme, it is anticipated that foraging birds would easily avoid the works area if any disturbance was created from noise, as there is an abundance of alternative habitat present in the landscape suitable for foraging.

Although the scheme is adjacent to an area of woodland listed on the AWI, works will be restricted to the A828 carriageway boundary and will not entail any tree felling. Pollution controls will be in place to ensure there is no loss of containment to the local environment. Therefore, the works will not impact the adjacent AWI woodland.

Although there are records of injurious weeds within verges adjacent to the carriageway within the scheme extent, all works are restricted to made ground within the A828 carriageway boundary. Works will entail like-for-like replacement of the road surfacing material and will not include earthworks or vegetation removal. The scheme does not require permanent or temporary land-take, accommodation works, site clearance, or locally-gained resources, and there is no requirement to import topsoil. As such, there is limited potential to spread or introduce INNS, invasive native perennials, or injurious weeds such as rosebay willowherb.

Pollution controls and good practice measures to reduce impacts of works on the local environment will be detailed in the SEMP and adhered to on site. Any protected

species in the area are likely to be accustomed to road noise on the A828 and the scheme is of short duration. Therefore, with the following mitigation measures in place, the risk of significant impacts on biodiversity are considered to be low:

- Works will be strictly limited to areas required for access and resurfacing works. Unnecessary encroachment onto terrestrial or aquatic areas will not be tolerated.
- On site light sources will be kept to a minimum, and only used as required. When in use, any artificial site lighting will be kept directional to the works area as far as reasonably practicable, reducing any light spill into the wider surroundings, and potentially sensitive habitat (e.g. woodland, road verges, and waterbodies). When not in use or required, light sources shall be switched off to reduce impact on nocturnal species.
- No tree felling or in-stream works are permitted.
- All construction operatives are to be briefed through toolbox talks prior to works commencing. The toolbox talks will provide information on the legislation, general ecology, and best practice measures for relevant protected species and INNS.
- Site personnel will be briefed on the location of the rhododendron, curled dock, and rosebay willowherb that is recorded onsite and will remain vigilant for the presence of any other potentially unrecorded instances of INNS or injurious weeds in road verges throughout the works period. Should any INNS be identified in working areas, no works may take place within 7m of these areas until the BEAR Scotland Environmental Team can provide further advice on additional mitigation measures.
- Site personnel shall remain vigilant for the presence of any protected species throughout the works period. Should a protected species be noted during construction, works shall temporarily halt until the species has sufficiently moved on. Any sightings of protected species shall be reported to the BEAR Scotland Environmental Team.
- A 'soft start' will be implemented on site each day. This will involve switching on vehicles and checking under/around vehicles and the immediate work area for mammals prior to works commencing to ensure none are present and that there is a gradual increase in noise.
- Any excavations, exposed pipes/drains, or areas where an animal could become trapped (e.g. storage containers) will be covered over when not in use, at the end of each shift, and following completion of the works to avoid animals falling in and becoming trapped.

- If fencing is utilised at any point during the works, a gap of 200mm from ground level will be provided, allowing free passage for mammals and preventing entrapment.

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

Material assets and waste

There is potential for impacts as a result of resource depletion through use and transportation of new materials. However, materials will be sourced locally where possible and the following mitigation measures will be put in place:

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

There is potential for impacts during works as a result of the improper storage or disposal of waste. The following mitigation measures will be put in place:

- The waste hierarchy (Reduce, Reuse, Recycle and Dispose) will be employed throughout the construction works.
- The subcontractor will adhere to waste management legislation and ensure they comply with their Duty of Care.
- Containment measures will be in place to prevent debris or pollutants from entering the surrounding environment.
- Road planings will be re-used or recycled under a SEPA Paragraph 13(a) waste exemption and in line with BEAR Scotland's Procedure 126: The Production of Fully Recovered Asphalt Road Planings.
- All wastes and unused materials will be removed from site in a safe and legal manner by a licensed waste carrier upon completion of the works. The appointed waste carrier will have a valid SEPA waste carrier registration, a copy of which will be provided to and retained by BEAR Scotland as early as possible.
- All appropriate waste documentation will be present on site and will be available for inspection. A copy of the Duty of Care paperwork shall be

provided and filed appropriately in accordance with the Code of Practice (as made under Section 34 of Environmental Protection Act 1990 as amended).

- Re-use and recycling of waste shall 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.
- If the works encounter coal tar, then this will be appropriately processed in line with Transport Scotland's [Guidance Note on Dealing with Coal Tar Bound Arisings](#). This will include:
 - Coal tar contaminated road planings will be classified as a Special Waste.
 - All waste will be appropriately segregated, with coal tar contaminated planing being kept separate from uncontaminated planings.
 - Coal tar contaminated road planings will be transported by a registered waste carrier and be accompanied by a SEPA-issued consignment note or code. SEPA will be notified no less than three working days (72 hours) before and no longer than one month before, prior to Special Waste leaving site. Special Waste will be sent to a facility that holds suitable pollution prevention and control permits and waste management licences. Copies of consignment notes will be retained for a period of three years.
 - Waste will be transported in a safe and secure manner to prevent the release of contaminated material en-route.

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

Noise and vibration

Construction activities associated with the proposed scheme have the potential to cause noise and vibration impacts through the use of equipment and construction vehicles for the proposed activities. The works are anticipated to take place during night-time hours. The proposed scheme is anticipated to result in temporary minor adverse noise impacts. The following mitigation measures will be put in place:

- The Best Practice Means, as defined in Section 72 of the Control of Pollution Act 1974, will be employed at all times to reduce noise to a minimum.
- For any night works, the Environmental Health Officer (EHO) and local residents will be notified of works and provided with a 24-hour contact number for the BEAR Scotland Control Room.
- On-site construction tasks shall be programmed to be as efficient as possible, with a view to limiting noise disruption to local sensitive receptors.
- For any night works within 300m of residential properties, the noisiest works shall be programmed to be completed before 23:00 each night (where possible).
- All site personnel will be fully briefed in advance of works regarding the need to minimise noise during works and of the site-specific sensitivities.
- All plant, machinery and vehicles will be switched off when not in use.
- All plant will be operated in such a way that minimises noise emissions and will have been maintained regularly to the appropriate standards.
- Where fitted, and where permitted under Health and Safety requirements, white noise reversing alarms will be utilised during construction.
- Where ancillary plant such as generators are required, they will be positioned so as to cause minimum noise disturbance. Where deemed necessary, acoustic screens will be utilised.

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

Population and human health

During construction, activities undertaken on site may have temporary adverse impacts on local residents, vehicle travellers, and non-motorised road users (NMUs) as a result of vehicle noise and delays due to traffic management measures. Local residents will be notified of works via letter drop and road users will be informed of works through a media release, which will provide details of construction dates and times. The works will be of short duration and will move progressively along the full scheme extent. With the following mitigation measures in place, the risk of significant impacts on population and human health is considered to be low:

- Local residents will be notified of the impending works. Information will provide contact details (office phone number and e-mail address) for the Project Engineer as well as a 24-hour contact number for the BEAR Scotland Control Room.
- Any changes of schedule (e.g. change from night works to daytime works) must be communicated to local residents throughout the programme.
- Appropriate provisions / measures shall be implemented within the traffic management to allow the safe passage of NMUs of all abilities through the site.
- Journey planning information will be available for drivers online at the trafficscotland.org website. Journey planning information will also be available for drivers online through BEAR's social media platforms.

Local accesses may be temporarily obstructed, and the bus stop/laybys within the scheme extents may be inaccessible or have limited/restricted use during the works. With the following mitigation measures in place, the risk of significant impacts on population and human health is considered to be low:

- Operatives will grant local access as required.
- Any bus stop or layby restrictions will be advertised locally.

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

Road drainage and the water environment

During resurfacing works, there is potential for temporary impacts on the water environment. Potential changes in water quality from pollution events (either by accidental spillage of sediments, particulate matter, chemicals, fuels or by mobilisation of these in surface water caused by rain or tidal movements) during works have the potential to have a direct or indirect effect on the surrounding waterbodies. The following mitigation measures will be put in place to reduce the risk of pollution incidents as a result of works:

- The scheme will not entail any in-stream works.
- Standard working practices to comply with The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended) for works in or near water are detailed in the Site Environmental Management Plan (SEMP) and will be adhered to on site.

- No discharges into any watercourses or drainage systems are permitted. Appropriate containment measures will be in place to prevent any loss of construction materials into the water environment.
- An incident response (contingency) plan will be put in place to reduce the risk from pollution incidents or accidental spillages. All necessary containment equipment, including suitable spill kits (for oil and chemicals) will be available on site, quickly accessible if needed, and staff trained in their use.
- All spills shall be logged and reported. In the event of any spills into the water environment, all works will stop and the incident will be reported to the project manager and the BEAR Scotland Environmental Team. SEPA will be informed of any such incident as soon as possible using the SEPA Pollution Hotline.
- All plant and equipment will be regularly inspected for any signs of damage and leaks. A checklist will be present to make sure that the checks have been carried out.
- Storage of COSHH material, oil and fuel containers shall be distanced more than 10m away from any watercourses.
- If required, a designated refuelling area shall be identified. Fuel bowzers shall be stored on an impermeable area and will be fully bunded. This shall be distanced more than 10m from any watercourses.
- During refuelling of smaller mobile plant, a funnel shall be used, and drip trays will be in place. Care will be taken to reduce the chance of spillages. Spill kits will be quickly accessible to capture any spills should they occur. The ground / stone around the site of a spill will be removed, double bagged and taken off site as special contaminated waste.
- Generators and static plant may have the potential to leak fuel and / or other hydrocarbons, and will have bunding with a capacity of 110%. If these are not bunded then drip trays shall also be supplied beneath the equipment with a capacity of 110%.

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

Climate

Construction activities associated with the proposed scheme works have the potential to cause local air quality impacts as a result of the emission of greenhouse gases through the use of vehicles and machinery, material use and production, and

transportation of materials to and from site. The following mitigation measures will be put in place:

- BEAR Scotland will adhere to their Carbon Management Policy.
- Use of any plant (including lighting) will be minimised as far as is reasonably practicable, to reduce the requirement for additional lighting.
- Local contractors and suppliers will be used as far as practicable to reduce fuel use and greenhouse gas emitted as part of the works.
- Where possible, materials will be sourced locally to reduce greenhouse gas emissions associated with materials movement, and waste will be disposed at local landfill.
- BEAR Scotland participate in CEEQUAL.

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

Major Accidents and Disasters

Parts of the A828 carriageway within scheme extents is at high risk (10% chance in any year) of surface, coastal and river water flooding.

Works are restricted to the made ground of the A828 carriageway and traffic management will be designed in line with existing guidance. The proposed works are anticipated to last 10 nights. Traffic management will consist of night-time single lane road closures, facilitated by two-way TTLs and a convoy system.

These measures, along with mitigation measures and standard working practices, will be detailed in the SEMP and adhered to on site.

As the works will be limited to the like-for-like replacement of the carriageway structure, there will be no change in vulnerability of the road to risk, or in severity of major accidents/disasters that would impact on the environment. The vulnerability of the project to risks of major accidents and disasters is considered to be low.

Assessment cumulative effects

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

The [Scottish Road Workers Commission](#) Interactive Map does not highlight any other works in the area at the time of construction.

[The Highland Council's Planning Application Portal](#) does not highlight any proposed developments or planning applications on the A828 carriageway within 300m of the scheme.

BEAR's current [Planned Works portal](#) has not highlighted any proposed works during the timescale or location of the proposed works.

BEAR Scotland programme all of their proposed works in line with appropriate guidance and contractual requirements. Any future schemes will be programmed to take into account already programmed works, and as such any effect (such as from TM arrangements and potential construction noise) will be limited. 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.

Assessments of the environmental effects

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

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

This is a relevant project in terms of section 55A(16) of the Roads (Scotland) Act 1984 as it is a project for the improvement of a road, and the completed works (together with any area occupied by apparatus, equipment, machinery, materials, plant, spoil heaps, or other such facilities or stores required during the period of construction) are wholly situated in the Ben Nevis and Glen Coe NSA, which is a sensitive area 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 (EIA) 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:

- Construction activities are restricted to the approximate 6,132m² (0.61ha) area of existing carriageway. The total working area is less than 1 ha.
- The works will be temporary, localised, and completed during night-time hours, when the traffic count is at its lowest levels.
- Containment measures 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.
- No in-combination effects have been identified.
- The risk of major accidents or disasters is considered to be low.

Location of the scheme:

- The scheme is situated in whole within Ben Nevis and Glen Coe NSA, a “sensitive area” as listed under regulation 2 (1) of the Environmental Impact Assessment (Scotland) Regulations 1999 (as amended). Works will not result in any change to the designated qualities of Ben Nevis and Glen Coe NSA.
- Although the works are located 310m from Glen Etive and Glen Fyne SPA, the high-level HRA concluded that the works would not result in any likely significant effects (LSE) on the qualifying features of the SPA.
- The scheme will be confined within the existing carriageway boundaries and as a result will not require any land take and will not alter any local land uses.
- Any impacts to the local landscape during the construction phase will be minor, temporary and not considered significant. In addition, no operational impacts are anticipated.
- Any storage/set-down areas will be located on made ground.

Characteristics of potential impacts of the scheme:

- Any potential impacts of the works are expected to be temporary, short-term, non-significant, and limited to the construction phase.
- Measures will be in place to ensure appropriate removal and disposal of waste.
- 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. The works are expected to result in positive impacts on road users during the operational phase.
- As the works will be limited to the like-for-like replacement of the structural components, there is no change to the vulnerability of the road to the risk or severity of major accidents/disasters that would impact on the environment.
- Mitigation measures detailed above (and in the SEMP) will be put in place with the objective to prevent and, if required, subsequently control any potential 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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