

Appendix E

Responses to Comments on Scoping Report

Summary of the Highland Councils response to Comments received from Consultees on the Scoping Report

Name and Address of Respondent	Issue Raised	Council Response
<p>Susan Haslam, Acting Planning Unit Manager (North), Scottish Environment Protection Agency, SEPA Corporate Office, Erskine Court Castle Business Park, Stirling, FK9 4TR</p>	<p>Policy</p> <p>We consider that the PPS listed in Appendix A provides a very good background framework to the development of the Strategy. There are a very small number of other PPS which we suggest are also considered and these are outlined below. To assist you with the process of considering the PPS, we provide a brief synopsis of the PPS aim, and where available, a link to the original document.</p> <p><u>Water</u></p> <ul style="list-style-type: none"> • River Basin Management Plans, which set out the proposed arrangements for River Basin Management Planning in the each of Scotland's two River Basin Districts (www.sepa.org.uk/about_us/consultations.aspx); • In relation to flood risk, the Directive on the Assessment and Management of Flood Risks (EC Directive 2007/60/EC). The Floods Directive's aim is to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity (http://ec.europa.eu/environment/water/flood_risk/index.htm). Note that this also be relevant to the climate change receptor; • Thematic Strategy on the Protection and Conservation of the Marine Environment (2002), its purpose being to protect and conserve the marine environment (www.scotland.gov.uk/Topics/Environment/Water/16440/7090). 	<p>Additional policy to be added</p>

Air

- The EU Thematic Strategy on Air Pollution (2005), which sets out interim objectives for improving air quality (<http://ec.europa.eu/environment/air/cafe/index.htm>).

Climate Change

- The Second European Climate Change Programme (currently in preparation) which notes that the work identified in the first programme is being undertaken according to plan, but that further measures will be required in order to meet the EU's commitments under the Kyoto agreement (<http://ec.europa.eu/environment/climat/eccpii.htm>).

Material Assets (including waste management)

- Taking Sustainable Use of Resources Forward: A Thematic Strategy on the prevention and recycling of waste (EU, 2005), one of several sector-focused strategies produced under the Environmental Action Programme (http://ec.europa.eu/environment/waste/pdf/sec_2005_1682_en.pdf);
- Building a Better Scotland Infrastructure Investment Plan: Investing in the Future of Scotland, (2005) sets out the delivery plan for achieving significant investment in transport, education, health, water, waste management, sports, business, flood prevention and regeneration programmes in Scotland (www.scotland.gov.uk/Publications/2005/02/20756/53560);
- Zero Waste Scotland, new policy and targets on waste management (www.scotland.gov.uk/Topics/Environment/waste-and-pollution/Waste-1);
- Councils own Waste Strategy (revision understood currently to be in draft);
- EC Framework on Waste 75/442/EEC Waste Framework Directive which establishes a framework for the management of waste across the European Community

	<p>www.wasteonline.org.uk/resources/InformationSheets/Legislation.htm#75442).</p>	
	<p>Baseline</p> <p>In relation to our interests the baseline information provided is good. The only specific area we would welcome more information on is in the air quality section; you may find the Environmental Report of the Regional Transport Strategy helpful in this regard.</p> <p>Most of our own data is available directly from SEPA's website. If you have difficulty location anything please contact our Access to Information team (Telephone: 01786 457700).</p> <p>In addition to this there are obviously other sources of information which may be useful and to try and help this work progress generally, we make the following suggestions.</p> <p>The Scottish Climate Change Impacts Partnership (SCCIP) website (www.sccip.org.uk) offers free access to data on climate trends and their impacts on Scotland which might be helpful.</p> <p>When considering the effects of climate change on flood risk the most recent climate change information for the UK as a whole is the United Kingdom Climate Change Impact 2005 (UKCIP05) study (Hulme et al., 2005). This study produced four scenarios (ranging from 'Low Emissions' to 'High Emissions') of climate change, based upon different projected inputs of greenhouse gasses to the atmosphere over the course of the 21st Century. Updated information was expected last year and is now expected in the spring. Further information can be found at www.ukcip.org.uk/.</p> <p>Where information on a Highland level is not available SEPA's State of the Environment Report for Scotland could provide national information (www.sepa.org.uk/changetomorrowtoday/report/index.html).</p>	<p>Additional air quality data to be added</p>
	<p>Scoping in/out of SEA Objectives</p> <p>We agree that in this instance all environmental receptors should be scoped into the assessment.</p>	<p>Noted</p>
	<p>Alternatives</p>	

	<p>Unfortunately we were not able to attend the scoping meeting and are therefore are not aware of the discussions on alternatives that took place.</p> <p>We agree that the purpose of SEA is not to generate alternatives. Instead its purpose is to assess the reasonable alternatives that have been considered in the plan-making process. From the text it would seem that the LTS facilitates recommendations made in other higher-level strategies. There are obviously different ways that these could be facilitated, and we would consider that it is these different options that representing the reasonable alternatives in this instance, and therefore it are these alternatives which should be assessed.</p> <p>Please note that if you have no intentions as a plan-make to either "do nothing" or pursue "business as usual" then we would not consider these to represent reasonable alternatives.</p>	<p>Following this comment a revised approach to the assessment of alternatives has been agreed with the Consultee Authorities.</p>
	<p>Approach</p> <p>We note that it is proposed that the strategic vision, objectives and core policy are all to be assessed. Having examined the draft strategy we consider this to be reasonable. Generally we would expect all aspects of the Strategy which could have significant effects to be assessed.</p> <p>The SEA Objectives proposed all seem reasonable to us. Providing the NTS and RTS SEA objectives alongside your proposed LTS SEA Objectives is a very useful way to demonstrate the linkages between the documents. We also welcome the setting of questions as a practical way to consider the assessment. In relation to material assets we would welcome that the SEA objective itself, or at least the assessment criteria question, consider waste management issues. A question "Will the LTS minimise the amount of waste produced, or encourage waste to be reused and recycled rather than disposed off?", or similar, should address this.</p>	<p>Noted</p> <p>Will include question on waste management in assessment criteria.</p>
	<p>Assessment</p> <p>We understand that the strategic vision and objectives will be assessed using one style of table and the core policy, using another. Generally rather than "compatibility" we would welcome assessment of significant effects, as this is what is required by the Act.</p> <p>It is not clear why the STAG criteria are also included in the policy assessment table; we would suggest</p>	<p>The Assessment matrices for the visions and objectives will be amended to look at the significant effects.</p>

that these might be best kept separate. If they are to be kept within the table then please ensure that comments on the assessment and significance relate to environmental issues and not social or economic issues.

We would expect the "comment on significance" box to be used in full to justify the decisions made. Removing the STAG criteria would allow more space for the comments box in the table.

We welcome the inclusion of mitigation in the table. However, we would encourage you to use this assessment to improve the environmental performance of individual aspects of the Strategy, and therefore mitigation would be best placed as a column (rather than a row) so that it can be related to each policy. Please remember that changes to the Strategy itself are the strongest forms of mitigation and we will be interest to see the differences between the current draft of the document and the one what will be published following assessment, along-side the ER.

Where the mitigation proposed does not relate to modifications to the Strategy itself then it should be clear how the mitigation will be achieved and by whom. These should follow the mitigation hierarchy (avoid, reduce, remedy or compensate). It would be extremely helpful to set out all mitigation measures in a way that clearly identified: (1) the measures required, (2) when they would be required and (3) who will be required to implement them. A summary table could be included as part of the preparation of the ER.

Generally when carrying out the assessment please refer to sections 6.3.7 to 6.3.3.12 of the Scottish Government SEA Toolkit which outlines the proposed coverage of the issues expected. Specific issues to consider may include, for example, the fact that:

- While air quality is generally very good in the area, air quality hotspots may occur at key points of congestion;
- Transport routes are an important source of diffuse pollution; and
- Construction of transport infrastructure will generally require watercourse crossings which can lead to disturbance of watercourses and the presence of permanent structures such as bridges can increase the risks of flooding.

	<p>Monitoring</p> <p>There is no reference in the scoping report to an approach to the monitoring of significant environmental effects from the Strategy.</p> <p>Although not specifically required at this stage, monitoring is a requirement of the Act and early consideration should be given to a monitoring approach particularly in the choice of indicators. It would be helpful if the ER included a description of the measures envisaged to monitor the significant environmental effects of the plan.</p>	<p>A draft monitoring framework will be included within the Environmental Report</p>
	<p>Next Steps</p> <p>We are satisfied with the proposal for an eight week consultation period for the ER.</p>	<p>Noted</p>

<p>George Hogg, Area Manager, Scottish Natural Heritage, Fodderty Way, Dingwall Business Park, Dingwall, Ross-shire. IV15 9XB</p>	<p>Scope and level of assessment</p> <p>1. A key factor for any transport strategy to address is climate change and the contribution that modal shift and increased proximity of services to population can make to combating climate change. Following on from the Climate Change (Scotland) Act 2009 the Scottish Climate Change Delivery Plan indicates contributions to greenhouse gas emission reductions expected from key sectors. An SEA Objective is proposed to address climatic factors, but the assessment criteria for this are more 'open-ended' in nature than the proposed assessment criteria for the other SEA Objectives. Therefore an understanding of the methodology and conclusions here may prove complicated. Any negative assessment ought as clearly as possible to be able to be concluded, so that mitigation can be considered or if necessary residual negative environmental effects clearly identified for the purposes of consultation and decision making.</p> <p>Leading on from this, since the draft LTS Objectives have already been identified in the draft LTS sent with the scoping report, it is possible to see that at present no LTS Objective specifically relates to the need to address climate change through the reduction of greenhouse gas emissions and adaptation to the effects of climate change. Although this could be considered within the proposed LTS Objective for the Environment ("Manage/reduce the impacts of transport on the natural and built environment"), we believe this objective should focus on more direct possible effects, with an additional LTS Objective being included to concentrate on climate change (e.g. "Seek to reduce greenhouse gas emissions and adapt transport infrastructure to withstand changing weather patterns").</p>	<p>We will amend assessment criteria for climate change to be more specific</p> <p>This will be considered as a recommendation following the assessment process.</p>
	<p>2. There is no reference in the other plans, programmes and strategies to the Highland Council's Single Outcome Agreement (SOA-2), although the draft LTS itself does include reference to the SOA (paras 2.76-2.77). However even here the reference is limited to the specific outcomes relating to transport, and so do not reflect the wider aspirations of the SOA to which all partners should work towards in their operations. Accordingly there needs to be more reference to and consideration of the SOA-2 as a whole in both the LTS and the SEA. The following local outcomes appear relevant at least -</p> <ul style="list-style-type: none"> • People across the Highlands have access to the services they need • Our natural heritage is protected and enhanced, enabling it to deliver economic, health and 	<p>Will provide text within the Environmental Report highlighting the links between the SOA 2 and the proposed LTS</p>

	<p>learning benefits</p> <ul style="list-style-type: none"> • Carbon emissions are reduced and communities are protected from the consequences of changing weather patterns (note this is one of the priority local outcomes) • The impact of the recession is limited and sustainable economic growth is supported (another priority) • To support the economy, access is improved to housing, transport and high speed broadband • Healthy life expectancy is improved, especially for the most disadvantaged <p>Any specific outcomes, indicators or targets relating to transport proposals in this SOA may need to be considered in the LTS SEA for any likely significant effects on the environment, since there was no SEA carried out for the SOA in view of its 'high level' nature. Thus one of the targets for transport in SOA-2 is to 'increase investment in lifeline roads and bridges'. A cross-reference could be made to the relevant LTS Objective or core policy that is taking this element of the SOA forward.</p>	
	<p>3. The relationship between the Local Transport Strategy, the Capital Programme and SEA needs to be considered carefully. Figure 9 of the draft LTS indicates that the Capital and Revenue Programmes sit underneath the LTS and are part of it ("LTS Capital and Revenue Programme"). Indeed Appendix B of the LTS will be the Capital and Revenue Programmes 2009-2014. However there is no reference to the components of the capital programme in the SEA, despite being how the LTS will be delivered on the ground. One possibility could be for the more significant proposed capital projects to be assessed against the SEA Objectives as well, e.g. road upgrades and improvements, new park and ride sites. Alternatively the assessment of the core policies of the LTS should allow for those elements within the capital programme that will deliver them, i.e. in scoring the core policy on road improvement schemes against the SEA objectives, account should be taken of relevant components of the capital programme that will be the 'on the ground' expression of the policy.</p>	<p>Cameron to advise on the status of the capital programme</p>
	<p>4. The proposed consideration of alternatives in the SEA essentially is either to produce the LTS or not to produce it. This does appear rather weak, and while we appreciate alternatives need to be reasonable and not devised for their own sake, it is a requirement to identify, describe and evaluate alternatives in the Environmental Report.</p>	<p>Following this comment a revised approach to the assessment of alternatives</p>

	<p>Figure 9.4 of the SEA Toolkit suggests a 'hierarchy' of alternatives, ranging from need/demand to mode/process, to location, to timing/implementation. There may be reasonable alternatives within the LTS relating to mode/process (i.e. alternative priorities that could be assigned to the LTS Objectives and hence the core policies that take them forward) and also – especially if the Capital Programme is more thoroughly included – relating to location and timing (i.e. selection and phasing of capital projects).</p>	<p>has been agreed with the Consultee Authorities.</p>
	<p>5. The SEA Scoping Report does not have a section on monitoring (included in part 9 of schedule 3 of the 2005 Act), but the draft LTS does, with Table 4 putting forward a draft monitoring framework for the LTS Objectives. This is to be welcomed, but the monitoring indicators will need to be expanded to consider the environmental effects covered in the SEA. Further examples might therefore be –</p> <ul style="list-style-type: none"> • The extent of fragile areas (or the index within this that considers accessibility) • Road kill deaths of protected species, especially badger and otter (fulfilling surveillance requirements for incidental killings of European Protected Species) • Development within designated nature conservation areas • Loss of prime agricultural land or peatland <p>For climate change, an indicator may be possible as part of any wider programme by The Highland Council in terms of monitoring greenhouse gas emissions, i.e. transport as a contributor to GHG emission levels in Highland.</p>	<p>A draft monitoring framework will be included within the Environmental Report</p>
	<p>6. In submitting a draft LTS at the same time as the SEA scoping report, there is a natural concern that the SEA process is not informing the production of the LTS. It is highly desirable that any mitigation identified in the draft Environmental Report should be reflected in the draft LTS prior to its consultation, with the draft LTS and the draft ER being available for consultation at the same time. This will mean that exactly parallel consultation times will not be possible for the draft LTS and the Highland Wide Local Development Plan Main Issues Report, but it would we believe be very beneficial for the LTS production process.</p>	<p>Noted</p>
	<p>Consultation period for the environmental report</p> <p>We note that a minimum period of eight weeks is proposed for consultation on the Draft Environmental Report (at the same time as consultation on the draft LTS) and we are content with this proposed minimum period and with</p>	<p>Noted</p>

	<p>consultation on the draft LTS and draft ER taking place at the same time.</p>	
	<p>PPS Review</p> <p><u>International Tier</u></p> <p>Suggest add for completeness re climate change the European Climate Change Programme (2005)</p> <p>The Ramsar Convention could be added, although the EC Wild Birds Directive is included</p> <p><u>UK National Tier</u></p> <p>Suggest add the UK National Aviation Strategy</p> <p><u>Scottish Tier</u></p> <p>Scottish Planning Policies – suggest add –</p> <ul style="list-style-type: none"> • SPP 11 Open Space and Physical Activity (references in here to green networks and to core paths) <p>Planning Advice Notes – suggest add –</p> <ul style="list-style-type: none"> • PAN 52 Planning and Small Towns • PAN 59 Improving Town Centres • PAN 75 Planning and Transport • PAN 76 New Residential Streets 	<p>PPS review to be updated in accordance with comments</p>

	<ul style="list-style-type: none"> • PAN 77 Designing Safer Places <p>Add “Scotland’s Scenic Heritage” and Planning Circular 9/1987 in order to cover National Scenic Areas</p> <p>Add Countryside (Scotland) Act 1967 – public bodies have a duty in respect of conserving the natural beauty and amenity of the countryside</p> <p>Add Land Reform (Scotland) Act 2003 in order to cover access, e.g. this places a duty on local authorities to identify and manage a core path network</p> <p>Could add “European Protected Species, Development Sites and the Planning System” (Scottish Executive, 2001) to address EPS more at the national level</p> <p>Add Scottish Soil Framework</p> <p>Health strategies and programmes should be added, to provide context for active travel, e.g –</p> <ul style="list-style-type: none"> • Let’s Make Scotland More Active (2003) • Improving Health in Scotland – The Challenge (2003) • Delivering a Healthy Scotland – Meeting the Challenge (2006) <p>Also in this context is “Safe Routes to Schools” to add</p> <p>Since ferries are included in the LTS, any PPS relating to the protection of the marine environment should be included – one example may be the OSPAR Convention on international cooperation on protection of the marine environment of the North-East Atlantic</p> <p><u>Local Tier</u></p> <p>As noted in the letter, there must be added a reference to the Single Outcome Agreement of THC (SOA-2) – the</p>	
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	<p>LTS must clearly demonstrate how it is working to achieve relevant parts of the SOA</p> <ul style="list-style-type: none"> • Add reference to the suite of Landscape Character Assessments covering Highland • Add reference to Core Path Plans covering Highland • Add reference to A96 Corridor Framework Plan • Add reference to Highland Council's Badger Policy Guidance Notes • If the Cairngorms National Park area is included within the LTS, then the Park Plan • and the Park Local Plan will need to be added 	
	<p>PSS Review Updates</p> <p>8 EU Habitats Directive - Amend third sentence to read "Projects are only permitted adversely affecting such sites under exceptional circumstances" – since there is a need also to be mindful of developments outwith sites but which could impact upon a site. Protected species should refer to Annex IV (European Protected Species) Amend last sentence to read "... must be subject to an Appropriate Assessment if there is likely to be a significant effect either alone or in combination with other plans and proposals".</p> <p>Add a sentence to say that "Any development or works that could potentially affect a European Protected Species can only be permitted if a licence to disturb can be obtained from the Scottish Government"</p> <p>Refer also to Article 10 Features – wildlife corridors – need to avoid fragmentation and to seek connectivity – support the green network concept as also now being advocated in NPF2 – safeguard and enhance functioning green networks</p> <p>10 EC Birds Directive - This should refer in column 2 to SPAs and the test once again about the possible need for Appropriate Assessments. In column 3 there should be consideration of impacts on wild birds themselves as well</p>	<p>PPS review to be updated in accordance with comments</p>

	<p>as on wild birds' habitats.</p> <p>17 Wildlife and Countryside Act 1981 as amended. Refer also here to protected species under Schedules 1 (birds), 5 (other animals) and 8 (plants) – strict protection except in exceptional circumstances</p> <p>22 NPF2 – this is now adopted</p> <p>30 NPPG 14 Natural Heritage – no need to refer to cultural heritage here too</p> <p>46 Title should be The Conservation (Natural Habitats, &c.) Regulations 1994 as amended – it has been amended several times, so it may be too unwieldy to have an entry for each Amendment Regulation – the overall implications for the LTS are consistent</p> <p>58 Scottish Climate Change Bill</p> <p>This is now the Climate Change (Scotland) Act 2009. The Scottish Climate Change Delivery Plan indicates the contribution to greenhouse gas emission reduction targets expected from key sectors. It identifies measures which can lead to a 32% reduction in transport-related emissions by 2020 (when compared with 2006 levels).</p>	
	<p>PPS to be removed</p> <p>21 NPF1 – this can now be deleted (replaced by NPF2)</p> <p>25 SPP 6 Renewable Energy – uncertain if this is relevant to LTS, so could be removed</p> <p>64-65 , 72 Other renewable energy strategies at the Scottish and Highland levels – as for SPP 6 it is rather unclear as to how this LTS can promote or otherwise renewable energy usage – so this may be an aspect that can be omitted (unless the electrification of the Inverness – Edinburgh/Glasgow railway line is promoted?)</p>	<p>PPS review to be updated in accordance with comments</p>
	<p>Baseline</p>	

	<p><u>Biodiversity, Flora and Fauna</u></p> <p>Table 1 – SPAs are for wild birds, not for flora and fauna. The total area figure of 6.59 km² is incorrect</p> <p>2.3.3 This should refer to Schedules 2 and 4 of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended, not the Habitats and Birds Directive 1994 (amended 2008). The European Protected Species listed could just refer to those occurring in Scotland, so long as this was made clear in the text – so the following can be omitted –</p> <ul style="list-style-type: none"> • Large butterfly • Dormouse • Sand lizard • Smooth snake • Shore dock • Early gentian • Lady's slipper • Creeping marshwort • Fen orchid • Floating leaved water plantain <p>There is a duty on Member States under Article 12.4 of the Habitats Directive to establish monitoring of incidental or accidental capture and killing of European Protected Species. Otter in particular are vulnerable to collisions with road traffic. A simple system of recording road kill by the Council's roads maintenance crews could help both inform the design of road improvements and contribute to Scotland's duty under the Directive to undertake</p>	<p>Baseline to updated in accordance with comments</p>
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surveillance. This can form part of the monitoring of this SEA and be baseline data for the SEA of future LTSs.

In the same vein Scottish Badgers has a database of the location of badger Road Traffic Accidents (RTAs) throughout Scotland, and this baseline data should be referred to by the Highland LTS, given the issues around the A96 corridor in particular. Highland Council should hold data on the inventory of ancient, semi-natural and long established woodland, and also selective Phase 1 Habitat Survey coverage.

Water

The WFD Area Management Plans for Argyll and Lochaber and for North East Scotland should be included to enable complete coverage of Highland.

Soil

Agricultural land classification could be used to consider possible effects on prime land. We note peatland data can be taken from Scottish data on both soils and land cover. Under soil is proposed a consideration of geodiversity. Therefore baseline information is required for this. Examples should include –

- Geological SSSIs
- Geological Conservation Review sites
- Regionally Important Geological Sites (RIGS)

Air

The Air Pollution Information Service (APIS) is the key source of information on the impacts of air pollution on habitats and species – see www.apis.ac.uk

Climatic Factors

The MONARCH Project (Modelling Natural Resource Responses to Climate Change) may provide useful environmental baseline data – it provides a valuable framework for studying the response of the key biodiversity elements to climate change.

	<p><u>Landscape</u> Areas of Great Landscape Value (AGLVs) should be added to Table 18 – data can be obtained from THC. Search Areas for Wild Land is another possible environmental baseline, although it may be concluded that the LTS will have no effect on such areas (negative or positive).</p> <p><u>Material Assets</u> The SEA Objective relating to this may need to be changed – as discussed at the workshop it may be better to focus this more on the walking and cycling networks, rather than transport infrastructure as a whole. Otherwise this will be a very self fulfilling section for a LTS. So data on cycle routes as well as core paths would need to be added.</p>	
	Yes - agree that all topics should be scoped in.	Noted
	<p>SEA Objectives</p> <p><u>General</u> It would be useful to see if the assessment criteria can all be answered ‘yes’ or ‘no’ in a consistent way, at least within each topic. Thus for Population and Human Health, the desired answer to the first two criteria is ‘yes’ while the desired answer to the last criterion is ‘no’ – it would be easier in reading the assessment if the last was converted to seek a ‘yes’ answer also, i.e. “Will the LTS maintain or enhance the air and water quality of the region”? – (although having said that these are repeated later, so this criterion is not really necessary here).</p> <p>The assessment criteria should allow for the scope for positive as well as negative environmental effects – thus for cultural heritage (“Will the LTS result in any adverse impacts upon the cultural heritage features of the Highlands?”) this may suppress consideration of seeking positive effects as well as avoiding negative effects – so this can be solved by simply removing “adverse” from this and other similar criterion.</p> <p><u>Biodiversity</u> 2nd criterion – rather than an ‘adverse effect’ it would be preferable if this was amended to ‘impact’ in order to be consistent with the 3rd and 4th criterion, and in order to allow in theory for positive as well as negative effects,</p>	<p>Noted</p> <p>Will review assessment criteria to ensure there is scope for positive as well as</p>

	<p>which is part of the SEA process.</p> <p>A further assessment criterion could be added to take account of green/wildlife networks and corridors (bearing in mind Article 10 of the Habitats Directive). It is important that functioning green networks should not be fragmented or connectivity impaired. On the positive side it would be desirable for currently fragmented wildlife movement areas to be connected by say hedge or tree planting. Therefore an additional criterion under Biodiversity could be along the lines of –</p> <ul style="list-style-type: none"> • Will green networks for the movement of wildlife be safeguarded and enhanced? <p><u>Soil</u> 3rd criterion – SPAs would not be designated on the basis of geology – so delete reference to SPA here.</p> <p><u>Climatic factors</u> See comments in main letter – the qualifications and caveats to the first two assessment criteria may over-complicate this part.</p>	<p>negative impacts</p> <p>To be amended</p> <p>Noted</p>
	<p>As noted above, the 3rd criterion under Population and Human Health could be omitted, as it duplicates air and water quality elsewhere. Otherwise the need to scope in all the issues limits the degree to which the objectives can be more focussed.</p>	<p>Noted</p>
	<p>Assessment matrices</p> <p>The methodology appears to switch between the Vision/Objectives and the Core Policies, using a different scoring system for each. It is not clear why this is proposed, and the proposed methodology for the Core Policies is the more conventional (ranging from major positive to major negative).</p> <p>The mitigation/recommendations column at the right hand side of the Vision/Objectives matrix is welcomed, and it would be clearer if similarly the final column at the right hand side of the Policies matrix was also headed Mitigation/Recommendations. It is highly desirable that identified mitigation should be taken back into the draft LTS produced at the same time as the draft ER, in order that it is clear that it is informing the strategy rather than</p>	<p>The Assessment matrices for the visions and objectives will be amended to look at the significant effects</p> <p>Column to amended</p> <p>Noted</p>

	<p>being left to a possible future document (thus 'economic growth' in the vision may need to be prefixed by 'sustainable'; an additional LTS Objective as noted may need to relate to the contribution to tackling and adapting to climate change; and Core Policy 13 re design guidance for new developments may need to include reference to species, habitats, landscape and access).</p> <p>The proposed consideration of potential cumulative impacts of the core policies is to be welcomed. It is however unclear how the assessment methodology will consider if necessary any cumulative impacts with other PPS, especially the Highland Wide Local Development Plan.</p> <p>More detailed matrices than that shown in Appendix C of the scoping report will presumably be included in the Draft Environmental Report to enable understanding of how aggregate scores of significance are obtained from a combined consideration of the assessment criteria, duration, permanence/reversibility and spatial scale.</p>	<p>Noted</p> <p>A robust commentary will be provided in the assessment matrices to justify how the aggregate scores of significance are obtained</p>
	<p>Methodology</p> <p>It does not seem necessary to include Scottish Transport Appraisal Guidance (STAG) criteria as well as SEA Objectives in the assessment methodology. It would seem less complicated if the STAG was kept separate from the SEA</p>	<p>Stag criteria to be removed</p>
	<p>Detailed Comments</p>	<p>To be amended</p>

Location	Section of text (if applicable)	Comment
Page 9, Table 2	Biodiversity, Flora and Fauna	Reference should be to Cairngorms National Park.
Page 11, Table 3	Biodiversity, Flora and Fauna	Should add reference also to species.
Page 16, Table 5	Soil	Add question mark after fourth bullet point
Appendix A, Links to other Plans, Programmes and Policies and their environmental objectives		
17. Wildlife and Countryside Act 1981 as amended		In column 3 should be SSSIs not SSS's. Reference to SAC and SPA here is slightly misleading as these are international sites rather than national ones and are not linked directly to the Wildlife and Countryside Act.
17. Wildlife and Countryside Act 1981 as amended	"...in terms of biodiversity) and strive to ensure they are adequately protected..."	Bracket not necessary; "...strive to ensure..." is not strong enough given that Highland Council has a duty under the Nature Conservation (Scotland) Act 2004 to further the conservation of biodiversity. Cross reference could be made to NPPG 14 and the policy test therein for development affecting SSSIs.
45. Nature Conservation (Scotland) Act 2004	"The LTS should seek to ensure [SSSI] protection and enhancement where possible".	"...seek to ensure..." is not strong enough given that Highland Council has a duty under the Act to further the conservation of biodiversity. Cross reference could be made to NPPG 14 and the policy test therein for development affecting SSSIs.

	<p>46. The Conservation (Natural Heritage <i>[sic]</i> & c.) Amendment (Scotland) Regulations 2004</p>	<p>Column 2, paragraph 3: "...Part Me of the Wildlife and Countryside Act 1981."</p>	<p>Should be The Conservation (Natural Habitats, &c.) Regulations</p> <p>Misprint re "Part Me"</p>	
Appendix B: Environmental baseline - Section 2; Biodiversity, flora and fauna				
Page 3, Table 1	SSSIs	Strictly speaking SSSIs are not defined as 'exemplary places for nature conservation' but as land of special interest by reason of its natural features.		
Page 7, Para. 2.5		Reference to Habitats Directive does not need to be in bold.		
Page 8, Para. 3.3.1. Population – para 3, line 9 of 10.	"Fodd Shop"	Should be food shop; Figure 3 Fragile Areas fails to state what the key means. Presumably the higher the indicator number, the more fragile the area, but this should be clarified.		
Page 11, Table 4	Road Accidents and Casualties	The "All Scotland" figure for fatalities (71) appears incorrect, as this is less than the number of fatal accidents (255)		
<p>Alasdair McKenzie, Strategic Environmental Assessment Team Leader, Historic Scotland,</p>	<p>Scope and level of assessment</p> <p>I found the Scoping Report to be clear and thorough and, subject to the specific comments set out below and in the annex, I am content with the scope and level of detail proposed for the environmental assessment.</p> <p>My understanding from the Scoping Report is that the environmental assessment will undertake an assessment of:</p>			<p>Noted</p>

<p>Longmore House, Salisbury Place, Edinburgh EH9 1SH</p>	<ul style="list-style-type: none"> • Strategic Vision • Objectives • Core Policy 	
	<p>I note that alternatives to the strategy have been considered, including a ‘business as usual’ and a ‘do nothing’ approach. You may wish to include in the report a discussion on how alternatives within the strategy itself have been assessed and to record the outcomes of these in a clear manner. For example, where a preferred option for a project is identified in the Local Transport Strategy (LTS), a discussion of the project’s alternatives should to be included in the Environmental Report to demonstrate that the environmental implications of the various options have been considered in determining the preferred option to be taken forward in the LTS.</p>	<p>Noted</p>
	<p>While we accept that the timing of the scoping exercise can be difficult to judge, the submission of the Draft LTS at the same time as the scoping report raises concerns that the preferred content of the strategy has already been substantially determined. It will therefore be important to demonstrate how the SEA has influenced the development of the LTS, indicating any mitigation measures or changes made during the course of the assessment within the Environmental Report.</p>	<p>Noted</p>
	<p>Simply for information, Scottish Historic Environment Policy (SHEP) (Chapter 1) provides a useful definition of the historic environment. It defines that the historic environment encompasses built heritage features (ancient monuments, archaeological sites and landscapes, historic buildings, townscapes, parks, gardens and designed landscapes, as well as marine heritage) and the context or setting in which they sit, and the patterns of past use, in landscapes and within the soil, and also in our towns, villages and streets. It also recognises that the historic environment has less tangible aspects including the historical, artistic, literary, linguistic and scenic associations of places and landscapes.</p>	<p>Noted</p>
	<p>Impacts on historic environment features often depend on the land-take associated with infrastructure and supporting activities, and may be avoided through appropriate locational measures. Impacts on the historic environment should be considered in terms of the following:</p>	<p>Noted</p>

	<ul style="list-style-type: none"> • direct i.e. loss of and/or damage to a feature of the historic environment e.g. through land take • indirect e.g. effects on the setting of a listed building or scheduled ancient monument; changes to surface drainage patterns, removal of peat; etc 	
	When undertaking the environmental assessment, you may find that some impacts are uncertain at the strategic level. Where this is the case it is important to identify these issues and to be clear how they will be taken into account at the lower level, for example at project level, and who will be responsible for following them through.	Noted
	<p>Consultation period for the Environmental Report</p> <p>I am content with the 8-week period proposed for consultation on the Environmental Report. Please note that, for administrative purposes, Historic Scotland consider that the consultation period commences on receipt of the relevant documents by the SEA Secretariat.</p>	Noted
	At the Environmental Report stage, I would prefer to receive paper copies of the report and the draft strategy, both of which should be sent via The Scottish Government Gateway in line with the procedures set out in the SEA Tool Kit (available at www.scotland.gov.uk/Publications/2006/09/13104943/45).	Noted
	<p>Introduction, setting the context and Draft Context of the Local Transport Strategy</p> <p>I found these sections very helpful for setting the context for the Local Transport Strategy (LTS) in particular the relevant issues, objectives and the policy context for LTS.</p>	Noted
	<p>Relationship with other Plans, Programmes and Strategies</p> <p>I am content with the PPS included for the historic environment in Appendix A.</p>	Noted
	<p>PPS Updates</p> <p>SHEP supersedes the policy elements of Passed to the Future and so you may wish to remove the reference to it from the list of relevant PPS.</p> <p>Managing Change in the Historic Environment Guidance Notes have now gone out to public consultation (31</p>	PPS review to update in line with comments

	<p>August). The consultation seeks views on the form and content of the guidance notes, which are designed to support the Scottish Historic Environment Policy (SHEP) and Scottish Planning Policy SPP23: Planning and the Historic Environment. The initial series of 14 notes replace guidance previously provided by the Memorandum of Guidance (1998). The notes have been designed to offer clear, consistent advice to professionals, developers and applicants and be published on-line. The consultation documents can be accessed via the following link http://www.historic-scotland.gov.uk/index/about/consultations/currentconsultations.htm</p>	
	<p>PPS Removal Please see Paragraph 1 of PPS Updates section above.</p>	Noted
	<p>Baseline</p> <p>I note that Gardens and Designed Landscapes (GDL) is listed in both Historic Environment and Landscape baseline data in Appendix B. For clarity and for accurate recording of environmental impacts you should amend the baseline data to show GDL's in one or the other and not both, and you should also include GDL's under the same SEA topic (Historic Environment or Landscape) in Table 2 page 10.</p> <p>I can confirm the following information for our historic environment interests:</p> <ul style="list-style-type: none"> • 186 A Listed Buildings • 1667 B Listed Buildings • 1162 C (S) Listed Buildings • 1237 Scheduled Monuments • 51 Gardens and Designed Landscapes (as a minor point we use the term Gardens and Designed Landscapes rather than <i>Historic</i> Gardens and Designed Landscapes.) <p>You may wish to also use the same historic environment protection objective as set out in Table 5 page 17 of the</p>	<p>To be amended</p> <p>Noted</p>

	<p>scoping report to ensure consistency.</p> <p>Historic Scotland can provide up to date GIS datasets under licence for scheduled monuments, listed buildings, and gardens and designed landscapes (contact hsgimanager@scotland.gsi.gov.uk). This information can also be downloaded from Historic Scotland's spatial data warehouse at http://hsewsf.sedsh.gov.uk/pls/htmldb/f?p=500:1:8448412299472048421::NO</p>	<p>To be amended</p> <p>Noted</p>
	<p>Proposed Scope and Level of Detail</p> <p>Do you agree with the approach to Scope all topics in?</p> <p>A: I note that all topics including the historic environment are scoped in to the assessment and I am content.</p> <p>Do you agree with the approach to assess the do nothing and do everything as our alternatives?</p> <p>A Please see my comments at point 1.3 of the accompanying letter.</p>	<p>Noted</p> <p>Noted</p>
	<p>SEA Framework</p> <p>Q.7 Are the SEA Objectives suggested in Table 5 suitable for this particular assessment?</p> <p>A: I am content with the SEA objectives suggested for the historic environment in Table 5.</p> <p>Q.8 What recommendations would you have on refining the list to ensure focus is maintained on only the key significant issues for the LTS?</p> <p>A: Significant issues for the historic environment arising from the implementation of the strategy are likely to be negative/adverse due to the new transport interventions and land-take associated with these, and I therefore agree that the assessment criteria should concentrate on the potential for adverse impacts to the historic environment.</p> <p>Q. 9 Do the assessment matrices outlined in Appendix C provide sufficient detail on the proposed assessment</p>	<p>Noted</p> <p>Noted</p>

	<p>methodology?</p> <p>A: I am content with the proposed methodology for the assessment of the LTS. I welcome the early consideration of how any mitigation measures will be identified and taken forward. As you will be aware these should follow the mitigation hierarchy i.e. avoid, reduce, remedy or compensate (for negative effects) and enhance where appropriate (for positive effects). Mitigation measures may include making changes to the strategy, as well as proposing more detailed measures to be implemented as the strategy objectives or policies are delivered.</p>	<p>Noted</p>
	<p>Monitoring</p> <p>The ER should provide an outline of how significant and unforeseen environmental effects will be monitored. When monitoring the effects of the strategy, indicators chosen for the historic environment should reflect both the actions to be taken within the strategy and the potential impacts identified in the course of the SEA. I would be happy to discuss this further should you find it helpful.</p>	<p>A draft monitoring framework will be included within the Environmental Report</p>

Appendix F

The Highland Council Local Transport Strategy: Screening for Appropriate Assessment

Introduction

This report documents the screening for ‘Appropriate Assessment’ (AA), which has been undertaken as part of the Strategic Environmental Assessment of the Highland Council’s Local Transport Strategy (LTS). An Appropriate Assessment is required where any plan is likely to have a significant effect on a ‘Natura 2000’ site (designated under the EU Habitats and Birds Directives), which are transposed into Scottish law by the ‘Conservation (Natural Habitats &c) Amendment (Scotland) Regulations 2007. Natura 2000 sites include Special Areas of Conservation and Special Protection Areas. Ramsar sites are also included in Appropriate Assessment, in accordance with advice from Scottish Natural Heritage.

The LTS lies within or adjacent to a large number of Natura 2000 sites, of which 41 have the potential to be significantly affected. The potential environmental impacts of the LTS on these sites and their interaction with the requirements of the Habitats Regulations are critical to the development of a realistic and viable strategy.

The following table provides a summary of the AA process;

Table G1: AA steps

Screening Phase	
Step	Task
1	Identify the geographical scope of the plan.
2	Identify all European sites that may be affected (maritime and terrestrial)
3	Consider the qualifying interests and conservation objectives of each European site which may be affected, in the context of the plan’s aims and objectives
4	Plan implications; consider the development objectives and what they might entail for one or more European sites. Including an estimation of the likely magnitude, duration, location and extent of the effects of these changes as far as possible
5	Determine which, if any, elements of the plan would have a ‘likely significant effect’ on any interest/feature of any European site, alone or in combination with other projects and plans, directly or indirectly
6	If no ‘likely significant effects’ on European sites, plan may be submitted to Scottish Government and adopted
7	For each likely significant effect, consider avoidance measures to remove the significant effect on the European site. If such modifications remove the likelihood of a significant effect on any European site, the plan may proceed to adoption or submission for Scottish Ministers’ approval. Records will be kept of the modifications made, their appraisal and the reasoning behind such a conclusion. Where there are residual likely significant effects, we will progress to Stage 2 (Appropriate Assessment Phase)

Appropriate Assessment (AA) Phase	
8	Where a significant effect on a European site remains likely, an AA is required. Agree the methods and scope of the AA with SNH and other relevant stakeholders (e.g. SEPA; The Scottish Government).
9	For each likely significant effect, alone or in combination, undertake an AA of the implications for the site in light of its conservation objectives (regulation 48(1)).
10	Having formally consulted SNH (regulation 48(3)) and other stakeholders (regulation 48(4)), identify any impacts on European sites, possible avoidance and/or mitigation measures, or restrictions which would allow them to be undertaken. The Scottish Government need to ascertain that the plan would not adversely affect the integrity of any European site (regulation 48(5)). Consider any restrictions or modifications to which the plan may be subjected, in order to achieve 'no adverse effects' (regulation 48(6)).
11	If no adverse effect on European site integrity plan can proceed to adoption. For a high level offshore wind plan, show which developments will need further, more detailed assessment at site level (i.e. lower tier AA)
12	If it <i>cannot</i> be ascertained that a plan will <i>not</i> adversely affect European site integrity, The Scottish Government can only proceed with it if it is agreed that it meets the necessary tests for imperative reasons of overriding public interest.

Methodology

The AA screening complies with Scottish Government guidance on AA². The methodology for this screening is based on discussions³ that took place in September 2009 with Scottish Natural Heritage, the statutory consultee for AA in Scotland. It was decided that a simple table would be produced to outline the key environmental implications for the different transport schemes and what, if any, further AA work was required. This approach was taken for the following reasons;

- To avoid repetition; some of the proposed transport schemes in the LTS have already been assessed in the AAs of other plans⁴

² Assessing Development Plans in Terms of the Need for Appropriate Assessment (Interim Guidance). Scottish Government, 2006.

³ Email correspondence with Graham Neville, 21/10/09, 22/10/09.

⁴ Transport Scotland Strategic Transport Projects Review AA, AA in Support of the HITRANS Regional Transport Strategy

- given the strategic nature of the LTS and its core policies at this time specific detailed interventions have not been identified; they would therefore be extremely difficult to assess appropriately.

All Natura 2000 sites located within or near the Highlands were screened for potential impacts; no sites were ‘scoped out’. Due to some Natura 2000 sites having an extensive list of qualifying interest features, these features and the conservation objectives for the sites are presented in the citations at the end of this appendix.

Table G2 shows the distances for which impacts of the LTS are possible, as used in the AA of the Strategic Transport Projects Review (STPR) for Scotland. For the sake of brevity a full description of species and sensitivity and evidence sources are not repeated here. The receptors in this table refer to the qualifying interest features of all potentially affected Natura 2000 sites.

Impact Screening Methodology

Table G2: Impact receptors and distances

Effect	Receptor used in STPR AA	Distance from transport scheme for possible impact
Habitat Loss and / or Fragmentation;	All habitat types	2 km
Noise & Vibration;	Breeding bird species	1.5 km
Changes in Hydrology and/or Water Quality	All aquatic ecosystems	2 km

Screening for air pollution from NO_x, NH₃, heavy metals and particulates is based on possible impacts from major roads passing within 200m of a Natura 2000 site, a distance quoted in UK Design Manual for Roads Bridges guidance⁵ for possible impacts on Natura 2000 sites.

⁵ Interim Advice Note 61/05: Guidance for Undertaking Environmental Assessment of Air Quality for Sensitive Ecosystems in Internationally Designated Nature Conservation Sites and SSSIs (Supplement to DMRB 11.3.1)

Summary results

Many aspects of the LTS are conceptual and it was therefore not possible to assess any tangible impacts on Natura 2000 sites. However, many specific interventions are presented within Core Policies (CPs) contained in the LTS and it was possible to assess these due to site location details being known. These interventions are shown in the maps at the end of this appendix and are as follows;

- CP2: Road Improvement Schemes; Trunk Road Priorities
- CP4: Pedestrian and Cycle Network
- CP5: Road based Public Transport (Part 1 – Key route network); bus priorities
- CP6: Rail based Public Transport
- CP8: Air Services
- CP9: Ferry Services
- CP10: Parking Policy: new park and ride sites

The assessment found that there were possible significant impacts on 41 Natura 2000 sites (see table G3). These impacts are likely to occur in the following ways;

CP2: Road Improvement Schemes; Trunk Road Priorities

As a result of road improvements, particularly the dualling of the A96 between the A96 and the A9 south of Inverness and link roads between the A96 and A9 and between the A9 and A82. Roads that already run through Natura 2000 sites were also assessed to have likely significant impacts and therefore require further site-level AA. These are as follows;

- The A82 passes through River Moriston Special Areas of Conservation (SAC), Onich to Ballachulish Woods SAC, Glen Coe SAC, Rannoch Moor SAC and the Rannoch Lochs Special Protection Area (SPA) and Ramsar sites and passes very close to Urquhart Bay Wood SAC
- The A9 passes through or very close to Slochd SAC, Kinveachy Forest SPA and Ramsar site, the River Spey SAC, Insh Marshes SAC, SPA and Ramsar sites and the Drumochter Hills SAC and SPA
- Developments associated with the A96 have the potential to impact on the nearby Moray Firth SAC, the Inner Moray Firth SPA/ Ramsar and the Loch Flemington SPA

In general terms these road improvements could fragment all habitat types or degrade it through drainage run-off, changes to water levels or air pollution from dust and chemical pollutants, principally oxides of nitrogen, ammonia and heavy metals. Dust pollution would be more likely to be associated with the construction phase whereas airborne chemical pollution would be more likely to be caused by vehicles using the road after construction. Traffic could also disturb qualifying bird species through noise or light pollution. Finally, increased numbers of vehicles using the A82, A9 and A96, or roads leading from them, could lead to increased recreational pressure on many sites, which could particularly affect ground-nesting bird species that are qualifying features of many SPAs and Ramsar sites.

CP4: Pedestrian and Cycle Network

Impacts from pedestrian and cycleway improvements were only deemed to be likely if new structures were placed in the River Spey SAC, if drainage of pollutants from the path affected the River Spey SAC or if there was a change to water table levels or an increase in recreation disturbance to habitats, qualifying bird species or otters.

CP5: Road based Public Transport (Part 1 – Key route network); bus priorities

Improvements to bus services were seen to improve air quality and therefore reduce potential impacts on Natura 2000 sites, but actual road engineering works could lead to potentially significant impacts. Road widening could also cause impacts on various Natura 2000 sites in the longer term. These impacts would likely be the same as those described above under the potential impacts of CP2.

CP6: Rail based Public Transport

Works at Conon Bridge Railway Station were found to have uncertain impacts due to lack of precise details of the works. The nearest Natura 2000 site to the station is Conon Islands SAC, which lies within 0.5km of the station. However, the SAC is on the opposite side to the A862, meaning impacts may be unlikely unless the A862 itself is affected by the station improvements.

CP8: Air Services

Increased airport usage or expansion could lead to air pollution affecting some Natura 2000 sites but the impacts would depend on weather conditions and emissions from vehicles and aircraft operating from the airports. It could also lead to increased noise and physical disturbance to the qualifying bird species of the Inner Moray Firth SPA and Ramsar site from Inverness airport improvements and the Cuillins SPA from Broadford airstrip operations.

CP9: Ferry Services

Increased use of ferry services could potentially impact on seals, otters and the qualifying bird species of various SACs, SPAs and Ramsar sites if noise disturbance or litter and chemical pollution was to occur in their proximity, but these impacts were seen to be unlikely as JNCC data on Standard Natura Data forms does not indicate any such threats from existing ferry services.

CP10: Parking Policy: New Park and Ride Sites

Impacts were only likely to occur as a result of new park and ride sites if their development in some way led to increased private vehicle usage (and therefore increased air pollution) of the roads in their proximity, drainage of pollutants into designated habitat or direct land-take of designated or supporting habitat.

Conclusions

The AA found that most likely impacts are likely to occur as a result of road improvements, especially with roads that already run through Natura 2000 sites. Impacts from many transport schemes were not easy to predict but possible impacts were listed for habitat loss and fragmentation, air pollution, run-off pollution, road strike, noise pollution and changes to hydrology. To summarise, the AA found that there were possible significant impacts on 41 Natura 2000 sites in total, yet impacts were unlikely to occur on 14 of these sites. For all sites where there was an uncertain impact, further details of the transport schemes will be needed to assess their likely impacts. A large number of schemes, including those listed as having uncertain effects, will require further, site-level AA.

Table G3: Screening Matrix

Intervention	Description	Natura 2000 Sites ⁶	Potentially Significant Impacts	Take forward to scheme specific AA? ✓*
Trunk road priorities				
A96 Inverness to Nairn	Dualling proposals; Masterplan for development through the corridor Inverness to Nairn	Moray Firth SAC	Habitat impact pathways <ul style="list-style-type: none"> • Increased chemical and particulate pollution from construction activities • Increased pollution caused by fuel spills and leakages. • Increased pollution from run-off and erosion from or near road edges. Habitat effects	✓

⁶ Qualifying features and conservation objectives for the international sites of nature conservation interest are listed at the end of this matrix

			<ul style="list-style-type: none"> Elevated sediment and solids levels increasing turbidity and sedimentation rates. Potential change in biotopes and stability of subtidal sandbanks from increased pollution <p>Species effects (secondary)</p> <ul style="list-style-type: none"> Disturbance to, damage and loss of bottlenose dolphins <i>Tursiops truncatus</i> from increased pollution (e.g. affecting breathing, breeding and feeding, depressing immune system etc) 	
		Inner Moray Firth SPA	<p>Habitat effects</p> <ul style="list-style-type: none"> Air pollution of NOx, NH3 causing nutrient enrichment, airborne heavy metal pollution; elevated growth of some plant species from nutrient enrichment Air pollution; construction dust deposition; abrasion of plants, shading, and cumulative effects e.g. drought stress, change to soil chemical composition Run-off pollution of ditches and drains during construction and operation of the dualled road - could lead to siltation and degrading of the site. Water pollution impacts on substrates and food sources for qualifying bird species. Hydrological impacts due to construction – raised or lowered water tables Habitat loss or fragmentation to SPA or adjacent habitats, including feeding and roosting sites 	✓

			<p>Species effects</p> <ul style="list-style-type: none"> • Road traffic noise disturbance to qualifying bird populations • Road traffic light pollution disturbance to qualifying bird populations • Physical, noise and light disturbance to qualifying bird populations from construction activity 	
		Inner Moray Firth Ramsar	<p>Habitat and species effects</p> <p>As above for SPA</p>	✓
		Loch Flemington SPA	<p>Habitat effects</p> <ul style="list-style-type: none"> • Air pollution of NOx, NH3 causing nutrient enrichment, airborne heavy metal pollution; elevated growth of some plant species from nutrient enrichment • Air pollution; construction dust deposition; abrasion of plants, shading, and cumulative effects e.g. drought stress, change to soil chemical composition • Run-off pollution of ditches and drains during construction and operation of the dualled road - could lead to siltation and degrading of the site. <p>Species effects</p> <ul style="list-style-type: none"> • Road traffic noise disturbance to Slavonian Grebe (Podiceps 	✓

			<p>auritus) population</p> <ul style="list-style-type: none"> • Road traffic light pollution disturbance to Slavonian Grebe (Podiceps auritus) population • Physical, noise and light disturbance to grebe population from construction activity 	
A82 corridor	Upgrades to road standard	North Inverness Lochs SPA	<p>If road size or traffic volume increases;</p> <ul style="list-style-type: none"> • Road traffic noise disturbance to Slavonian Grebe (Podiceps auritus) population • Road traffic light pollution disturbance to Slavonian Grebe (Podiceps auritus) population • Physical, noise and light disturbance to qualifying bird populations from construction activity • Recreation disturbance, particularly to ground-nests of Slavonian Grebe 	?
		Urquhart Bay Wood SAC	<ul style="list-style-type: none"> • Air pollution of NOx, NH3 causing nutrient enrichment, airborne heavy metal pollution; elevated growth of some plant species from nutrient enrichment • Air pollution; construction dust deposition; abrasion of plants, shading, and cumulative effects e.g. drought stress, change to soil chemical composition • Run-off pollution of ditches and drains during construction and operation of road • Impacts on water table of alluvial delta/ forest 	✓
		River Moriston SAC	<p>Water Pollution Risk (affecting habitats and species)</p> <ul style="list-style-type: none"> • Pollution (chemical and particulate – suspended solids and 	✓