

Inverness West Link Road Design Project
Strategic Environmental Assessment
Post-Adoption Statement

PART 1

To: SEA.gateway@scotland.gsi.gov.uk

or

SEA Gateway
Scottish Executive
Area 1 H (Bridge)
Victoria Quay
Edinburgh EH6 6QQ

PART 2

A post-adoption SEA statement is attached for the PPS entitled:

Inverness River and Canal Crossing (West Link) Design Project

The Responsible Authority is:

The Highland Council

PART 3

Contact name Simon Hindson

Job Title Planner

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Signature & date S. Hindson 06/04/2012

Introduction

This document (referred to here as the post-adoption SEA statement) has been prepared in accordance with Section 18 of the Environmental Assessment (Scotland) Act 2005.

This is the Post-Adoption Statement for the Inverness West Link Road Design Project, a decision on the final route and to progress future work on the project with only one option (Option 6) being taken forward, was taken (adopted) on 1st March 2012 at the meeting of The Highland Council who are the Responsible Authority.

The details of the Inverness West Link Design Project and the accompanying Strategic Environmental Assessment can be viewed online at:

<http://www.highland.gov.uk/developmentplans>

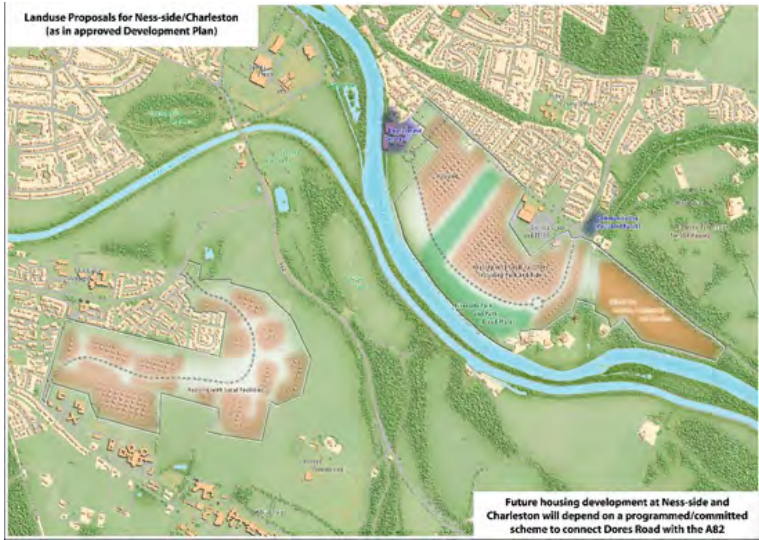
The documents can also be viewed at:

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Key Facts

Name of Responsible Authority	The Highland Council
Title of Plan, Program or Strategy (PPS)	Inverness West Link Road Design Project
What Prompted the PPS	A detailed design of a river and canal crossing is required to ensure the road is delivered to facilitate a reduction in congestion within Inverness City Centre and the wider city area, including public transport and active travel improvements.
Subject	Transport
Period Covered by the PPS	2011 onwards
Frequency of Updates	As required
Area Covered by PPS	 <p>Landuse Proposals for Ness-side/Charleston (as in approved Development Plan)</p> <p>Future housing development at Ness-side and Charleston will depend on a programmed/committed scheme to connect Dores Road with the A82</p>
Summary of nature/content of the document	The purpose of the design project was to consider the options for the delivery of a river and canal crossing to the south west of Inverness to be used as a distributor road.
Date Adopted	1 st March 2012
Contact Point	Simon Hindson, Planner Simon.hindson@highland.gov.uk Council Headquarters, Glenurquhart Road, Inverness, IV3 5NX (01463) 702261

STRATEGIC ENVIRONMENTAL ASSESSMENT PROCESS

The Inverness West Link Road Design Project has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Environmental Assessment (Scotland) Act 2005. This has included the following activities:

- Taking into account the views of the Scottish Environment Protection Agency, Scottish Natural Heritage and the Scottish Ministers (Historic Scotland) regarding the scope and level of detail that was appropriate for the Environmental Report
- Preparing an Environmental Report on the likely significant effects on the environment of the Inverness West Link Road Design Project which included consideration of:
 - the baseline data relating to the current state of the environment;
 - links between the Inverness West Link Design Project and other relevant strategies, policies, plans, programmes and environmental protection objectives;
 - existing environmental problems affecting the Inverness West Link Design Project;
 - the likely significant effects on the environment (positive and negative);
 - measures envisaged for the prevention, reduction and offsetting of any significant adverse effects;
 - an outline of the reasons for selecting the alternatives chosen;
 - monitoring measures to ensure that any unforeseen environmental effects will be identified allowing for appropriate remedial action to be taken.
- Consulting on the Environmental Report
- Taking into account the Environmental Report and the results of consultation in making final decisions regarding the Inverness West Link Road Design Project
- Committing to monitoring the significant environmental effects of the implementation of the Inverness West Link Design Project. This will also identify any unforeseen adverse significant environmental effects and to enable taking appropriate remedial action.

How Environmental Considerations have been integrated into the Inverness West Link Design Project and how the Environmental Report has been taken into account

This section of the Post Adoption Statement sets out how environmental considerations have been taken into consideration when the final decision on the route of the Inverness West Link Road. It will contain information on how the following has been addressed in the Inverness Trunk Link Road Design Project:

- Environmental Problems
- Significant negative effects
- Mitigation
- Significantly positive effects

Environmental Problems

The table below outlines the environmental problems which were identified in the Environmental Report and how these have been addressed in bringing forward the Inverness West Link Design Project:

SEA Issue	Potential Environmental Impact resulting from the Inverness West Link Design Project	How has this been taken into account in producing the Highland-wide Local Development Plan
Biodiversity, flora, fauna	Construction activities and crossing design may affect open water and have an impact down stream. The potential exists for European protected species and other protected species on the site. Loss, fragmentation and isolation of habitats and disturbance to species from the construction of a crossing. Habitat loss and fragmentation due to culverting of water courses.	A Construction Environmental Management Plan will be produced and implemented to avoid significant adverse impacts. A protected species survey has been undertaken to look at the likelihood of the presence of protected species and identify potential mitigation. The chosen route avoids the most important habitats within the area and mitigation will be brought forward through the design stage to limit disturbance to species during construction. The chosen route avoids any water courses which would have required a culvert.
Population	Increasing population, increases traffic in and around the City leading to congestion at peak times.	This route will allow for a reduction in congestion around the city centre as an alternative route will be available for cross-city traffic.
Human health	Noise associated with high traffic flows can have a detrimental affect on human health.	The crossing will displace the high traffic flows through the city centre to an area which is largely un-habited. It is anticipated however that development will take place around the chosen route but sufficient safeguards will be put in place through application of good practice and planning policies which will avoid impact on human health.
Soil	New infrastructure would result in both temporary impacts on and permanent loss of greenfield land. It should be noted that this land has been allocated for development in the Inverness Local Plan and the Highland wide Local Development Plan (Proposed Plan).	In adopting option 6 the Council have committed to providing net betterment of the open space in the area. In choosing the preferred option impact on soil and geology including impacts on important geomorphological features such as Torvean Landforms will be avoided.
Water	Water quality in the River Ness is good and in the Caledonian Canal has good ecological potential. Disturbance of the river during	The chosen crossing will avoid the use of culverting and put in place appropriate construction methods to avoid impact on the

	construction may have an impact (albeit temporary) on the water quality. Potential disturbance to groundwater during the construction period.	water environment.
Air	If the river and canal crossing results in increased traffic then there maybe an increase in emissions which may reduce air quality.	The chosen crossing will provide active travel options for crossing the river and canal.
Climatic factors	Increased emissions for the potential increased traffic may have an impact on climate change.	The chosen crossing will provide active travel options for crossing the river and canal.
Material assets	The crossing can enable the development of additional active travel links	The chosen crossing will seek to promote the sustainable use of natural resources.
Cultural heritage	Risk of impact on the setting of cultural heritage features.	By locating the development of the canal crossing close to the existing Tomnahurich crossing it will avoid significant detriment to the Caledonian Canal. The crossing will also avoid impact on listed buildings, the Inverness Riverside Conservation Area and the Torvean Motte SAM.
Landscape	Any new crossing is likely to have an impact on visual amenity and landscape character	The location of the chosen crossing will allow for landscape impact to be mitigated, however ti is recognised that their will be a material change in landscape character.

Significant negative effects identified in the Environmental Report and whether / how these have been dealt with by the Inverness West Link Road

It is considered that there will be a significant negative environmental effect on SEA Objective 1 – *Maintain and enhance designated wildlife sites, biodiversity, valuable habitats and protected species, avoiding irreversible losses and SEA objective 4 - Value and protect the diversity and local distinctiveness of landscapes*. It is likely that the negative effects of this option on SEA Objective 1 will only be very local and short term. It is recognised that there will be a landscape impact of any of the options and this will be significant as a previously un-developed area will now become developed.

Mitigation

The exact design and construction methods of the bridge are still to be decided therefore it has been possible by carrying out the Strategic Environmental Assessment of the Inverness West Link Road Design Project that mitigation can be put in place to avoid the significant negative environmental impacts and enhance the positive impacts. In doing a raft of mitigation measures are proposed which will be a consideration in the final design and construction of the river and canal crossing. This mitigation was set out in the Environmental Report and is repeated below:

- Fish Habitats survey to be carried out;
- Appropriate lighting of bridge;
- Compensatory planting where required;
- Archaeological survey work to be undertaken;
- Maximise active travel linkages;
- Avoid closure of canal/paths/trails for
- Appropriate design of bridge;
- Sensitive construction methods employed;
- Include mitigation such as badger/otter crossings where the route passes through their territory.
- Appropriate landscaping;
- Improved active travel links through the area;
- Provision of new active travel

prolonged periods during construction.

linkage between crossing and
Dores Road Roundabout.

Much of this mitigation is dealing with more minor effects but some of it including those related to landscaping, compensatory planting and bridge design are specifically in place to reduce the negative impacts of the river and canal crossing on the landscape. The impacts on SEA objective 1 are largely down to the effect on species during construction. These are addressed by two specific mitigation measures as set out above related to the fish, badger and otter habitats which may be affected by this river and canal crossing.

Significant positive effects identified in the Environmental Report and whether / how these have been dealt with in the Highland-wide Local Development Plan

It is likely that the Inverness River and Canal Crossing in this location will have one significant positive effect and this would be on SEA Objective 5 – *Maintain and enhance active travel and recreational access opportunities within the wider area*. In the mitigation for this option set out above this positive effect is secured and seeks enhancement of the existing situation.

How Consultation Responses have been taken into account

The Environmental Report was published at the same time as the consultation on the Inverness West Link Design Project in late 2011.

During the consultation period, The Highland Council received comments from all of the Consultation Authorities and from members of the public as well.

The following pages set out how the views of all respondents to the Environmental Report have been taken on board.

Comments received at Environmental Report (Main Issues Report Stage)

Historic Scotland

Comment	Response
<p>Thank you for consulting Historic Scotland on the Environmental Report for The Highland Council's Inverness West Link Design Project which was received in the Scottish Government's SEA Gateway on 22 November 2011. I have reviewed the Environmental Report on behalf of Historic Scotland and should make clear that this response is in the context of the SEA Act and our role as a Consultation Authority. It therefore focuses on the environmental assessment, rather than the contents of the project, to which Historic Scotland shall be replying separately.</p>	Noted.
<p>General Comments I welcome that the comments we provided at the scoping stage on 24 August 2011 have been taken into account during the preparation of the Environmental Report. My focus in reviewing the Environmental Report is on the potential for significant environmental impacts on the historic environment that may arise from the project. The Environmental Report is well presented and clearly considers the environmental implications of the each option. It provides a clear account of the steps undertaken during the assessment process and presents these in a logical structure. I am therefore content with the assessment.</p>	Noted.
<p>Assessment of Options I note that the majority of options score negatively against the SEA Objective for the historic environment with the exception of Option 9 (Do-nothing scenario). Of these options 7 and 8 are considered to be significantly negative. I am content to agree with this assessment.</p>	Noted.
<p>Mitigation For all options the mitigation considered that could relate to the historic environment includes archaeological investigation, sensitive design and layout, appropriate landscaping and minimising construction impact on the canal tow path. I am satisfied that this mitigation is appropriate for the level of impact involved in the options.</p>	Noted.
<p>Monitoring No monitoring is suggested for the impacts identified on the historic environment. Given the nature of the impacts of the options, in that they are primarily "one-off", I would agree that the key role in monitoring the impacts on the historic environment lies in the implementation of the mitigation.</p>	Noted.

None of the comments in this letter should be taken as constituting legal interpretation of the requirements of the SEA Act. They are intended rather as helpful advice, as part of Historic Scotland's commitment to capacity building in SEA.	Noted.
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Scottish Environment Protection Agency

Comment	Response
<p>Thank you for your Environmental Report (ER) consultation submitted under the above Act in respect of The Inverness West Link Design Project. This was received by SEPA via the Scottish Government SEA Gateway on 24 November 2011.</p>	<p>Noted.</p>
<p>We have used our scoping consultation response to consider the adequacy of the ER. We previously considered that in respect of our main areas of interest (air, water, soil, human health and climatic factors) the project is not likely to have significant strategic environmental effects. We therefore do not have any specific comments to make in terms of the ER.</p>	<p>Noted.</p>
<p>Although we do not consider that the project will have significant strategic effects on the environment we do consider that it may have some local effects. We have already been consulted on the draft project options environmental appraisal and hope to continue to be consulted as the project develops so we can provide detailed comments on local environmental issues within our remit.</p>	<p>Noted.</p>
<p>As The Inverness West Link Design Project is finalised, Highland Council as Responsible Authority, will require to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government SEA templates and toolkit which is available at www.scotland.gov.uk/Publications/2006/09/13104943/13. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.</p>	<p>Noted.</p>

Scottish Natural Heritage

Comment	Response
<p>I refer to your Environmental Report (ER), sent to the Scottish Government SEA Gateway on 24 November 2011. In our role as a Consultation Authority, in accordance with Section 15(2) of the Environmental Assessment (Scotland) Act 2005, we have reviewed the above report. Our comments on the report are set out below. These comments focus on the affected designated sites: Torvean Landforms Site of Special Scientific Interest (SSSI) and the River Moriston Special Area of Conservation (SAC).</p>	<p>Noted.</p>
<p>Environmental issues/concerns and key trends identified We are pleased to note that the report covers all of the key environmental issues. There are however a few sections of the report which we recommend you amend.</p> <ul style="list-style-type: none"> – Page 3, Biodiversity, Flora and Fauna, first paragraph: This wording could be misleading. As reported elsewhere in the ER, both Atlantic salmon and fresh water pearl mussel are both qualifying features of the River Moriston SAC. – Page 5, What are the current environmental problems?: It would be worth highlighting that the proposals could impact nationally important geological features. – Page 25, Biodiversity, Flora and Fauna, paragraph 1, final sentence: This sentence could be misleading. Torvean Landforms SSSI is purely a fluvio-geomorphological site and is not designated or noted for its habitats. We recommend deleting this sentence and noting this habitat interest in the following paragraph. – Page 30, Environmental Problems, Row entitled Soil: We recommend that you amend the ‘implications’ to state that the guidance should seek to avoid impacting the physical integrity of Torvean Landforms SSSI and minimising the impact on its visual integrity. – Page 35, Option 7: This paragraph refers to Option 7 ‘cutting through’ Torvean Landforms SSSI. The current design for Option 7 is a high level option and does not involve any cuttings. We recommend that this paragraph is reworded. 	<p>Noted. These changes will be made to the finalised environmental report.</p>
<p>Assessment of likely significant effects on the environment The assessment of likely significant effects on the environment is thorough and we agree with the conclusions reached for the SEA Objectives relating to the SSSI and SAC (Objectives 1 and 2).</p>	<p>Noted.</p>
<p>Identification of measures that could prevent, reduce or offset any significant adverse effects on the environment</p>	<p>Noted. These modifications will be made to the environmental report.</p>

<p>We are pleased to note that there are a couple of measures in place to mitigate for impacts on the River Moriston SAC and its Atlantic salmon and fresh water pearl mussel interests. These include a fish habitats survey, appropriate lighting of the bridge and appropriate design of the bridge. Sensitive construction methods are also listed and we assume that these will include appropriate timing of the construction phase.</p> <p>We recommend that the measures to prevent and reduce significant adverse impacts on Torvean Landforms SSSI are expanded upon in all relevant sections (including on pages 6, 51 and 110) of the document. They should include all of the mitigation that we recommended in our letter to your council dated 16 September 2011:</p> <ul style="list-style-type: none"> – Elevation of the road above the level of the esker ridge with sufficient headroom to allow pedestrian access underneath. – Design of the embankment to ensure that it doesn't encroach on to the esker ridge. – Sensitive micro-siting of the bridge piers to avoid the footprint of the esker. (Please note the rewording of the mitigation currently listed.) <p>Great crested newts are referred to for a number of the proposals that are likely to impact on the ponds at Torvean Golf Course (Options 2, 4, 5 and 8). No great crested newts have been recorded in these ponds by the survey work undertaken so far. Mitigation for them is therefore not required but there are other amphibians present and they will need to be considered should any of these routes be chosen.</p>	
<p>Monitoring measures The monitoring measure proposed for Torvean Landforms SSSI is not adequate. Measuring the area of the SSSI affected will tell us very little about the impact that the proposal has on the site's designated interest. Instead we recommend monitoring the impact that the proposal has on the physical and the visual integrity of the esker ridge and the wider SSSI. We can provide further detail on how this can be done if necessary. Should Option 7 be selected we will be keen to work closely with your council on the design of the route and on detailed monitoring indicators for the site.</p>	<p>Noted. The monitoring indicator will be revised in the finalised environmental report</p>
<p>Additional Comments Please note that we should be listed in paragraph 3 on page 11 as key partners to this process.</p>	<p>Noted.</p>
<p>Concluding remarks I hope that these points are helpful. Please note that this response is in the context of the</p>	<p>Noted.</p>

Mrs Stafford

Comment	Response
<p>It is my understanding that SEA is only required for plans, programmes and strategies, where SEA objectives provide a tool for assessing the potential environmental effects arising from the implementation of plans. PAN 1 2010 'SEA of Development Plans' provides much insight on SEA, including that:</p> <p><i>Strategic Environmental Assessment (SEA) has a key role to play in delivering sustainable economic growth.</i></p> <p><i>SEA is an important and statutory step that must be built into the plan preparation process. It has a positive role to play within this, reflecting the aspirations for the new development planning system within Scotland. SEA can add value to development planning, by stimulating creative and lateral thinking, helping to challenge traditional views and facilitating fuller consideration of the environmental effects of policies and proposals.</i></p> <p><i>Linking the principles of plan preparation and the requirements of the 2005 Act can be viewed as challenging, but the new process of development planning has been designed to accommodate the SEA process.</i></p> <p><i>The central aim of SEA is to help ensure that the environment is given the same level of consideration as social and economic factors within the plan. It can do this by promoting:</i></p> <ul style="list-style-type: none"> <i>• integration of environmental information into the plan preparation and adoption process;</i> <i>• early dialogue with consultees, particularly those with environmental expertise, but also the wider public;</i> <i>• full and objective consideration of alternatives to ensure that the best environmental options are identified and taken on board as far as possible; and</i> <i>• transparency of decision-making, through the publication of the post adoption SEA statement.</i> <p><i>Where policies are rolling forward without change, the SEA could include a simple screening exercise to assess their effects, and go on to explore any potential significant effects in more detail. It could also identify cumulative effects of the plan as a whole by collectively assessing the effects of policies which are not changing.</i></p> <p><i>The SEA should assess the vision in broad terms, and consider any reasonable alternatives from a purely environmental perspective. This could include questioning whether a vision focused primarily on economic development has considered its environmental effects, or exploring whether a different balance can be struck within a draft vision, to better reflect environmental sensitivity within the plan area.</i></p> <p><i>The SEA environmental report has to be published for consultation alongside the main issues report... Plan preparation and SEA should be integrated...</i></p> 	<p>Noted. For the Inverness West Link Design Project the Strategic Environmental Assessment process was undertaken to facilitate a better understanding of the strategic environmental issues which may be apparent if each option is taken forward. This was then used to help inform the decision making on the final option.</p>

<p>Etc</p> <p>I have major concerns about how SEA is being used by Highland Council to inform, or not, as the case may be, decision making through the Development Plan process; this has a direct bearing on the environmental assessment of the road options that we are being consulted upon.</p>	
<p>What little work there was regarding the West Link was carried out as part of the SEA on the Local Transport Strategy, LTS. SNH has informed me that:</p> <p><i>...the Local Transport Strategy (and its SEA) contains a 'core policy' for road improvements and the proposed 'Inverness Link Road' was assessed as part of this. Minor negative effects were identified for biodiversity, soil, water and cultural heritage. This is a very high level document and so the mitigation was recommended to be undertaken at the project level environmental assessment.</i></p> <p>I appreciate that:</p> <p><i>'The broad coverage of the [SEA] legislation in Scotland provides an opportunity to better link SEAs and thus reduce potential duplication. As SEA practice develops and experience grows, this should provide significant opportunities for streamlining. Greater integration may be horizontal or vertical'. 'Key point - link your SEA with others that have already been undertaken to give a clearer view of the 'bigger picture' and minimise resource requirements'.</i></p> <p>However I have serious concerns regarding the depth of analysis carried out by simply including the Inverness Link Road assessment as part of a 'core policy' and therefore concerns arise as to how effective this would have been in informing the Development Plan Process to the level required.</p> <p>I also have concerns regarding the timelines and the ability of the LTS SEA itself to have been able to influence the HwLDP process. I am currently looking into this in more detail.</p> <p>I contend that it would have been more appropriate for a thorough environmental assessment of the impacts of the West Link road construction to have been carried out as part of the SEAs on the HwLDP MIR and the HwLDP PP. I do not agree with the West Link Design Project SEA statement as in note 1 over page. I also contend that if it is too late to comment on the land allocations in the Ness-side/Charleston areas through the IMFLDP and development in these areas is considered proven due to their inclusion in the HwLDP then it is too late to link them to any SEA related to the IMFLDP, if that is the intention.</p> <p>Note 1 Where the SEA states on page 48 re 'Highland Wide Local Development Plan'</p> <p>The Highland wide Local Development Plan identifies Ness-side and Charleston as areas key for consolidation of the city of Inverness prior to the expansion of the city. Without the west link only a limited amount of housing can be delivered in this area meaning development in the A96 corridor will</p>	<p>The production of the Local Transport Strategy and the Highland-wide Local Development Plan were twin tracked to the stage of the Main Issues Report for the Highland-wide Local Development Plan. The SEA work for the Highland-wide Local Development Plan was used to inform the SEA for the Local Transport Strategy. The Local Transport Strategy informed the production of both the Main Issues Report and Proposed Plan of the Highland-wide Local Development Plan.</p> <p>While the principle of development for a mix of uses has been carried into the Highland-wide Local Development Plan for the Ness-side and Charleston allocations (which has been subject to examination) the local detail of these allocations will be looked at as part of the Inner Moray Firth Local Development Plan and therefore will again be subject to SEA.</p>

<p>need to be brought forward. This is contrary to our vision and strategy set out in the Highland wide Local Development Plan which identifies the need for a river and canal crossing to facilitate the delivery of development to consolidate the city. Therefore it is considered that this project is compatible with the Highland wide Local Development Plan.</p>	
<p><u>Comments on this SEA – the above noted impediments to the consultation process result in this list not being exhaustive.</u></p> <p>I was originally advised by SEPA on 25032011 that the “West Link is at project options appraisal stage now, so SEA would not apply”. However it is now noted in the ‘SEA activities to Date’ on page 10 of this SEA that ‘<i>Following comment from the Consultation Authorities it was determined that an SEA would be required on the 25th July 2011.</i>’ I would be grateful if you could please explain this apparent ‘change of heart’.</p>	<p>The position of the Scottish Environment Protection Agency has not changed. They advised The Highland Council that they do not consider that the project would lead to significant environmental effects on topics within their remit. However, the other Consultation Authorities advised that the project may lead to significant environmental effects. With this in mind, The Highland Council took the precautionary approach and undertook SEA.</p>
<p>1 With respect to the INVERNESS CITY TRUNK LINK ROAD - WEST LINK OPTIONS APPRAISAL SUMMARY TABLE: I don’t understand how option 6 can be a major beneficial impact under row ‘Policies and Plans’ on page one of table. ILP was not subject to any environmental assessment.</p>	<p>The plans and policies row of this table was related to compatibility or otherwise with policies and allocations within the Inverness Local Plan and other relevant plans.</p>
<p>2 With respect to ‘Regional policies and plans’ it seems incongruous to me that, “<i>The project will have due regard to the land allocations and general policies on the local development plan</i>” when SEA on the road options should have been used in the first place to test the inclusion of those land allocations – see previous comments on page 3. Surely this is closing the stable door after the horse has bolted.</p>	<p>The section where this is written indicates whether the project will be impacted on or be influenced by a number of plans, programmes and strategies. Whichever route is chosen there would be implications on the land allocations contained within the Highland-wide Local Development Plan, the Inverness Local Plan and it will have an impact on what type and level of development on allocations (especially in the Ness-side and Charleston areas) which will be contained within the Inner Moray Firth Local Development Plan.</p>
<p>3 The ‘Open space audit plan’ on page 68 simply lists the area where the rugby pitches are as outdoor sports facility which does not begin to convey the myriad uses for the area when the pitches are not being used for matches. The value of the area as ‘open space’ to be enjoyed as a major accessible health benefit is not recorded. Not all users of the area are members of the American Football, Golf, Rowing or Rugby clubs. In fact many users, and visitors many not be. This should be taken into consideration under human health, particularly when this SEA states that The West link design project ‘<i>... will take into account health related impacts of different strategies and seek to promote more active travel.</i>’</p> <p>Please see Appendix 2 regarding the benefits of simple fresh air and the concerns regarding vitamin D.</p>	<p>The open space audit follows a national methodology for the identification of open space. While there are a number of uses of the canal pitches outdoor sports facilities are considered the primary use. For more information on this please see the Highland Greenspace Audit: http://www.highland.gov.uk/NR/rdonlyres/3BB70201-8829-477A-A644-CC3BE8A24290/0/highgreenauditintro.pdf and for specific detail of Inverness’ open spaces please see the Inverness map of the greenspace audit: http://www.highland.gov.uk/NR/rdonlyres/2421FA71-</p>

	80C3-410D-8A84-5DBFD177796D/0/greenauditresinvss.pdf
<p>4 The 'land allocations map on page 65' does not show areas which may be included in the forthcoming IMFLDP and hence may not show the full picture of planned development for the area and how congested it will become.</p>	<p>Noted. As the Main Issues Report was not published and the call for sites options had not been fully considered at the time of the publication of the Environmental Report this was not contained. The finalised Environmental Report will contain a map showing the area in the Inner Moray Firth Local Development Plan.</p>
<p>In terms of Table 2 – page 13 onwards.</p> <p>Where the council states under 'European Climate Change Programme (2005)' that "The project should promote choice and raise awareness of the need for change; and aim to reduce the need to travel. The Council will promote active travel." How does the 'West Link' project comply with this?</p> <p>Where the council states under 'UNECE Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters. 'The Aarhus Convention' Adopted June 1998' that, 'Public involvement in the formulation of the project should be actively facilitated. Consultations should incorporate the views and suggestions of local residents, business groups, council representatives and government.' How does the Council intend to demonstrate that it has effectively met its obligations under the convention?</p> <p>5.3 S Where the council states under 'Scottish Executive: Choosing Our Future Scotland's Sustainable Development Strategy (2005)' that 'The project will take account of objectives relating to sustainable development. Measures for reducing the need to travel and a shift to active and public transport will positively contribute to these indicators.' What specific measures will be taken in terms of reducing need to travel and use of public transport and how do they sit in terms of levels of importance within the West Link Design Project</p> <p>5.4 Where the council states under 'Land Reform (Scotland) Act 2003' that 'The project needs to be aware of community land ownership and liaise with communities in order to assess if there are any allocations that may be required for the community's benefit. The project will also take into account local paths that need to be maintained, improved and safeguarded from development.' What does this mean in relation to this West Link project?</p> <p>5.5 Where it states under 'Inverness and Nairn Core Path Plan' '...sufficient for the purpose of giving the public reasonable access throughout their area' what is considered to be 'reasonable access'?</p>	<p>Which ever option is chosen effective active travel linkages will be included in the final design of that route.</p> <p>This Strategic Environmental Assessment Post Adoption Statement is part of our response to this Convention. In addition Transport, Environment and Community Services have undertaken consultation on the West Link Road options and have responded to a series of questions on the website.</p> <p>Which ever option is chosen provision will be made for appropriate active travel linkages and public transport. The issue of reducing the need to travel is somewhat wider than the Inverness West Link, however it will provide a shorter route for cross-city traffic to access facilities on opposing sides of the river.</p> <p>The issue of community benefit is outwith the scope of the planning system but in the decision made on the final route of the west link the overall benefit to the community will be a consideration. In the case of the chosen route this is net betterment of recreational open space provision.</p> <p>Reasonable Access is considered as no impediments of access of the land and if development(s) are to affect an access route that any alternative provision is no less attractive, and is safe and convenient for public use. This is inline with Policy 77 of the Highland-wide Local</p>

	Development Plan.
<p>How do you define the term 'Active Travel' in the context of this West Link Project?</p> <p>Please could you illustrate how you would, '<i>Maintain and enhance active travel and recreational access opportunities within the wider area.</i>' – see page 33.</p> <p>How do you define the 'wider area' and how does it relate to the statement made on page 29 re gaps;</p>	<p>Active travel is defined as walking and cycling.</p> <p>We would do this by no net detriment to the existing access in the area and building in active travel opportunities to the chosen route</p> <p>The wider area is considered to be the City of Inverness as defined by the Inverness Local Plan. This will be clarified in the Finalised Environmental Report.</p>
<p>Gaps/Unreliability of Baseline Data <i>This Strategic Environmental Assessment has been informed by an Environmental Assessment of Options specially commissioned for the Inverness West Link Design Project. While this document used the most up to date information available, it focused mainly on the area which will be directly affected by the river and canal crossing.</i></p> <p>7.1 Under SEA objective 5 - <i>Maintain and enhance active travel and recreational access opportunities within the wider area?</i> What is 'Active Travel' in this context? What modes of travel are considered? What is the wider area – see 6.2 above</p>	See above response.
<p>What does this - <i>It is considered that the level of development which would be facilitated by this option would not lead to significantly different affects than those experienced through delivery of the option alone except in terms of increased opportunities for recreation/active travel as the routes through any new development will help create new opportunities.</i>- mean? (Page 46)</p>	It means that no matter what level of development is brought forward alongside this option the environmental effects of this route would not be that different. This will be clarified in the finalised environmental report.
<p>I am really not happy with table on page 54 With regard to SEA objective 5; I dispute the conclusion that any of the options may have a ...<i>neutral affect on the recreational access around and on the Caledonian Canal in the medium to long term.</i> I am also very concerned that access will be restricted during construction in the short term where the 'short term' is defined as up to 5 years. Given the short term adverse effects how can you score +/- for the short term? What mitigation is to be provided to compensate for or to offset the short term adverse effects? The current 'free' access to the canal from the rugby pitches cannot fail to be affected by the construction of a road as set out in options 1-6 in the long term. Could you let a small child run freely on the pitches up towards the canal once a road is constructed? It is this precious sense of freedom that will be lost forever it seems. Why use terms like 'detrimental effect' with respect to impacts on Whin Park and Option 3 but not when regarding the open use of the rugby pitches in terms of option 1, this is surely inconsistent and very unfair. The use of the open space at rugby pitches may mean as much to users as the use of the playpark to its constituency. Many people do not have or have childless 'grown up' children and would not consider walking in this area. Similarly dog owners are not allowed access to Whin park.</p>	<p>Noted. The justification for the scoring is set out in the environmental report. In terms of the mitigation in the short term alternative access routes will be provided. The detail of access to the canal in the medium to longer term from the canal pitches will be dealt with through the design of road. The use of wording is noted and will be amended in the finalised environmental report.</p>

Additional comments have also been made in the form of an appendix which included a series of e-mails with the council and details on vitamin D. These comments have been noted.

Mr Tuley

Comment	Response
<p>1 - UNREADABLE</p> <p>The Council is failing in its duties under EC Directive on Public Access to Environmental Information (2003/4/EC) because it is not possible for the public to read the entire document [page 14].</p> <p><i>“Appendix 1 – Relevant Baseline Information and Maps”</i> [page 56] gives a list of 11 maps but the maps are not provided in the order listed and some of them do not have the same names as in the list. The worst examples are: <i>“Designated sites”</i> is the map on page 67 <i>“Natural Heritage Features”</i> <i>“Core Path Network”</i> - page 69 <i>“Paths and Trails (Inverness and Nairn Core Path Plan (2010))”</i> <i>“Development plan allocations”</i> is the map on page 65 <i>“Land Allocations”</i></p> <p>The colour of the legend on some maps does not agree with the shading on the map and some items in the legend do not appear on the map. I am a Chartered Forester and cannot understand the <i>“Forestry Features”</i> [page 70] and <i>“Water Quality”</i> [page 71] maps and the 4 yellow/brown colours on the <i>“Land Allocations”</i> [page 65] are confusing.</p> <p><i>“Appendix 2 – Option Drawings”</i> are of such poor quality that the annotations are unreadable. I queried the quality at Council Headquarters on 28 November 2011 and was provided with A3 sized maps to study and later have been provided with a set for use by Inverness Civic Trust. On 30 December 2011 the maps on the website still had unreadable annotations.</p>	<p>Noted. The Council has made these maps available on request and they were available at the public exhibitions. Revised mapping is included in the revised environmental report.</p>
<p>2 - MAJOR DISCREPANCIES</p> <p>Describing the road in Option 7 on page 35 it states: <i>“After leaving the Southern Distributor road at the Dores Road Roundabout the road would flow through through [sic] Ness Side and up a newly created embankment to cross [sic] the River and Canal with a high level bridge at the point where the 132kv cables currently cross the canal. There would be a need for a cutting through the Torvean landforms SSSI before disending [sic] down and connecting to a roundabout on the A82. This will also include a low level crossing of the Caledonian Canal close to the Tomnahurich Bridge.”</i></p> <p>The map on page 78 shows a pier erected in the steep slope at the edge of the Torvean esker and an embankment for the descent down but no cutting. On page 21 of the handout prepared for the public meetings [Council</p>	<p>Noted. This design was a last minute addition after the Strategic Environmental Assessment was prepared. The finalised environmental report addresses this point.</p>

<p>website – <i>Public Handout 2011 (4060kb pdf)</i>] is a drawing of the proposed bridge which shows the road entering the quarry on an embankment and not in a cutting. All the comments and scorings have been made assuming that there was to be a cutting but this is not the case. It would have been the case with a medium level lifting bridge but it appears that the design of the bridge has been changed but this has not been taken into account in the SEA. Also there is no explanation of why an extra low level crossing of the canal is needed – it increases the cost and allows more negative comments to be made about this option.</p>	
<p>In Appendix 4 for Options 1 to 6 and 8 for SEA Objective 1 there is the justification: <i>“This option will avoid the Torvean Landforms SSSI therefore it facilitates its protection.”</i> Whereas for in Option 7 it states: <i>“This option will go directly through the Torvean Landforms SSSI however this is designated for geological features rather than its biodiversity value.”</i> According to the SSSI citation [obtained from Scottish Natural Heritage website]: <i>“It is an important site for Quaternary geomorphology (less than 10 million years old) containing an excellent range of fluvio-glacial landforms (deposited by meltwater) comprising kame terraces, eskers and kettleholes.”</i> It is a geomorphological site [landforms] rather than geological [solid rock] and neither of these are anything to do with biodiversity. It appears that this has been mentioned in SEA Objective 1 to give a favourable comment to most of the options when it has nothing to do with biodiversity. This is WRONG.</p>	<p>This has been addressed in the Revised Environmental Report.</p>
<p>The detailed explanations and scorings in Appendices 4 and 5 are summarised in the main body of the report. There are discrepancies between the scores in the 2 places which should be identical: Option 6 SEA Objective 5 Local is ++ in Appendix 4 [page 104] but + in the report [page 39] Option 5 SEA Objective 4 [page 132 and page 45] Medium Term is -- in Appendix 5 but – in the report Long Term is -- in Appendix 5 but – in the report Local is -- in Appendix 5 but – in the report Option 5 SEA Objective 5 Regional is = in Appendix 5 [page 132] but +/- in the report [page45]</p>	<p>Noted. These have been revised in the Finalised Environmental Report.</p>
<p>On page 9 is a map with the title <i>“Landuse Proposals for Ness-side/Charleston (as in approved Development Plan)”</i> and page 65 is a map of <i>“Land Allocations”</i> which has one category of land <i>“Expansion”</i>. The latter map has a bigger area at Ness-side allocated for housing and also includes the adjoining area of Ness Castle which will contribute traffic onto any new road. Neither map acknowledges the existence of the current expansion of housing at Wester Craigs which includes the new Scottish Natural Heritage office.</p>	<p>Noted. As mentioned in response to another respondent an additional map will be included for clarification.</p>
<p>Option 6 Summary in Appendix 5 on page 136 is: Commentary <i>“It is considered that the level of development which would be facilitated by this option would not lead</i></p>	<p>Noted. This was a typing and formatting error and has been corrected in the finalised environmental</p>

<p><i>to significantly different affects than those experienced through delivery of the option alone except in terms of increased opportunities for recreation/active travel as the routes through any new development will help create new opportunities.”</i></p> <p>This bears no resemblance to what is on page 45:</p> <p><i>“It is considered that the level of development which would be facilitated by this option would not lead to significantly different affects than those experienced through delivery of the option alone except in terms of landscape affects which would be greater given the greater level of change in the landscape as apposed to delivery of the river and canal crossing in isolation.”</i></p>	<p>report.</p>
<p>The scoring system uses 5 main impact categories from Significant Positive, Minimal Positive, No or Neutral, Minimal Negative to Significant Negative. It might be argued that changing a scoring by one category is not a significant change because there are 2 categories between No or Neutral and Significant Negative but any change in score affects the overall total and so would be regarded as significant in the normal use of the word.</p>	<p>The purpose of SEA is to consider the significant environmental effects, it may be that there are effects but these are not significant which is why the scoring system has been applied and formulated, following advice from the Consultation Authorities.</p>
<p>3 – DIFFERENT TITLES</p> <p>On the Council Website after clicking on the image <i>Inverness City Trunk Link Road – West Link Second Public Consultation</i> are 3 documents which may be the Environmental Report referred to in the advertisement:</p> <p><i>Strategic Environmental Assessment (SEA) Report (4453kb pdf)</i> <i>SEA - Land Use Framework (3405kb pdf)</i> <i>SEA - West Link Options (76kb pdf)</i></p> <p>The heading in the Inverness Courier on 22 November 2011 was <i>The Highland Council Environmental Assessment (Scotland) Act 2005 Inverness West Link Design Project Environmental Report</i> but at the bottom of the advertisement it was called <i>Strategic Environmental Assessment – Environmental Report for Inverness West Link Design Project</i>. As I was unsure what document(s) I should consult on the website I visited the Council Headquarters and asked for the document referred to in the advertisement. I believe I was given just the one document although I did not have sufficient time at that visit to study all 151 pages in detail. To add to the confusion the footer on these 151 pages is <i>“Inverness West Link Design Project Strategic Environmental Assessment Environmental Report – For Consultation”</i>. I assume that the 151 page document is the one that is the subject of the advertisement because, according to the Cover Note, it has been submitted to the Scottish Executive [should it have been addressed to the Scottish Government?]. I believe that members of the public may be misled by these differences and may look at the wrong document. What is the status of these other 2 documents?</p>	<p>Only the document <i>“Strategic Environmental Assessment (SEA) Report (4453kb pdf).”</i> Is part of the SEA the other papers are back ground documents. The titles on the website will be revised and inconsistencies addressed.</p>
<p>4 – SCORING SYSTEM</p> <p>For Option 5 the Commentary on page 133 [Appendix 5] is the same as appears on page 45:</p> <p><i>“It is considered that the level of development which would be facilitated by this option would not lead to significantly different affects than those experienced through delivery of the option alone except in</i></p>	<p>The summary is a summary and as such not everything has been included within it. The finalised environmental report will be revised for clarification but the scoring will not be revised.</p>

<p><i>terms of landscape affects which would be greater given the greater level of change in the landscape as apposed to delivery of the river and canal crossing in isolation.”</i></p> <p>On page 131 as a Justification for SEA Objective 1 it says: <i>“It is considered that through considering this option with the potential for development that it may bring it will be likely that there will be a loss of habitat including possible fragmentation of habitat in the longer term in and around the Charleston expansion site.”</i></p> <p>These adverse comments are not in the summary and in spite of them the scoring has been made more attractive – THIS IS RIDICULOUS: SEA Objective 1 Short Term changed from - [page 39] to = [page 45] SEA Objective 1 Medium Term and Long Term changed from -- [page 39] to - [page 45]</p>	
<p>On page 42 the road options are classified into High, Medium and Low in relation to the potential release of development land. Options 3, 4 and 5 are classed as low with the comment <i>“All land at Charleston could be released limited development at Ness-side”</i> options 1, 2, 7 and 8 are classed as medium with the comment: <i>“This option would release all land at Charleston but limited land at Ness-side”</i> but option 7 gets an additional comment <i>“as a large area of the site would be lost to earth works”.</i> Option 6 is classed as high with the comment: <i>“All allocated land at Charleston and Ness-side could be released.”</i> There is no justification for these 3 different classes in the document and the wording of the low and medium are very similar. There is a separate document on the Council website, <i>“SEA - Land Use Framework (3405kb pdf)”</i>, which gives more information but it is not part of the SEA, is not referred to in the SEA, has not been sent to SEA Gateway and so is not part of the formal SEA which was advertised. It does have watermarks of <i>“Consultation Draft”</i> on it.</p>	<p>The landuse frameworks were brought forward to facilitate decision making on the appropriate route for the west link road.</p>
<p>There are many errors in typing in this document which should have been corrected by using a spell checker before publication [I have not corrected these errors in quotations].</p>	<p>Noted.</p>
<p>NON-TECHNICAL SUMMARY</p> <p>This should be a summary of information in the main report. It gives considerable detail about some items including the effects of the different options but fails to describe the different road options and on page 3 it describes it as: <i>“... a river and canal crossing to the south east of Inverness ...”</i> This is confusing because it should be south west not south east.</p>	<p>Noted. This will be revised.</p>
<p>In the Non-technical summary on page 3 it says:</p>	<p>The river and canal crossing will be a distributor</p>

<p><i>“The purpose of this design project is to consider the options for the delivery of a river and canal crossing to the south east of Inverness to be used as a distributor road.”</i></p> <p>On page 5 it says: <i>“What might happen if the Inverness West Link Design Project was not implemented?”</i> <i>Without the Inverness West Link Design Project it is considered that the likely future changes to the area will be:</i></p> <ul style="list-style-type: none"> • <i>Limited opportunity for development leading to faster expansion of the city rather than first consolidating the city which may lead to an adverse impact on the environment;</i> • <i>Given the growth around the city there will be an increase in traffic wishing to cross the city. Without a solution brought forward through the Inverness West Link Design Project this may lead to a decrease in air quality in the City Centre;</i> • <i>Limited opportunity to improve active travel connections across the city, making Inverness a more walkable/bikeable city.”</i> <p>Page 3 regards it as a distributor road but the second bullet point on page 5 indicates that without it there be more cross city travel [the changes in travel patterns in a separate document confirm that there will be no change to cross city travel]. The first bullet point quoted on page 5 is rubbish.</p>	<p>road. Through new development there inevitably will be an increase in cross-city traffic. While the road itself will not change the level of cross city traffic it will change the routes people use to get across the city to access certain facilities. Without the development of the Ness-side/Charleston sites there will be an increase in the housing land which will need to be released to meet demand for new housing.</p>
<p>The area covered by the project as shown on the map on page 9 is difficult to read and misleading. Three different features are shown within the areas for development but the text explaining this is unreadable. The development that is taking place at Westercraigs which includes the new office for Scottish Natural Heritage is not shown. People from this area are more likely to use Option 7 [high bridge through Torvean Quarry]. In the <i>“Land Allocations”</i> map [page 65] it is difficult to separate <i>“Expansion”</i> from <i>“Special Uses”</i> but it shows a larger area for the Ness-side development and also shows the Ness Castle and other areas further east as expansion areas.</p>	<p>Noted a revised map is included in the finalised environmental report alongside a new map showing the allocation options in the Inner Moray Firth Local Development Plan.</p>
<p>The <i>“Open Space (Inverness Greenspace Audit 2010)”</i> map [page 68] is difficult to interpret because the colours of the legend differ from shading on the map but it is clear that the golf course and sports grounds are <i>“Outdoor Sports Facility”</i> whereas the Torvean Quarry has no designation. The <i>“Forestry Features”</i> map [page 70] has a number of non forestry features on the map but the forestry features cannot be understood by a forester. The map on page 71 is even worse.</p>	<p>Noted. Revised maps have been included in the finalised environmental report.</p>
<p>For SEA 1 on page 36 it has: <i>“Will it safeguard Sites of Special Scientific Interest?”</i></p> <p>There are no biological SSSIs in the area. This point should be in SEA 2 and combined with the entry there to become Geomorphological not Geology. Should building embankments in the flood plain of the River Ness be considered under SE1, SE2 or SE4? Should there be a specific mention of the River Ness and recreation in SE5? Should there be a specific statement in SE5 – Does it include a new cycle route linking Dores roundabout and the A82 and how many junctions have to be negotiated? In SE5 what is the “wider area” is this Torvean quarry area or something beyond it? Should SE5 include safeguard and enhance existing recreational facilities like rugby pitches, golf courses etc.?</p>	<p>The issue related to Torvean Quarry SSSI has been removed from this SEA objective.</p> <p>The issue of the water environment (including flooding) has not been scoped into the assessment.</p> <p>Whichever route is chosen active travel will be a</p>

	key element of it however this will be a matter of detail for the final designed route.
<p>In all the Options in Appendix 4 for SEA Objective 1 the following Assumptions are made: <i>“For the purpose of this assessment it is assumed that no mitigation is built in. The freshwater pearl mussels are intrinsically linked with the lifecycle of the Atlantic Salmon”</i></p> <p>And after the summary at the end of each one, except Option 9 there is: <i>“The following mitigation is proposed to ensure that the negative and positive effects can be minimised/maximised respectively:</i></p> <ul style="list-style-type: none"> • <i>Fish Habitats survey to be carried out;</i> • <i>Appropriate design of bridge;</i> • <i>Appropriate lighting of bridge;</i> • <i>Sensitive construction methods employed;”</i> <p>I do not think that the lighting of a bridge more than 30 metres above the river and canal needs to be considered [Option 7]. There is no mention anywhere that all Options except Options 7 and 9 will involve the construction of 2 piers in the river which will require the use of cofferdams. During the construction phase this will cause considerable disturbance to the river and having 2 piers in the river will have some effect in the long term. This is a major omission. For Option 7 there are specific entries about the bridge:</p> <ul style="list-style-type: none"> • <i>Sensitive micro-siting of an bridge piers to avoid impact on SSI</i> • <i>Consideration of bridge design to limit landscape impact”</i> <p>I agree that siting of any piers in the SSSI needs to be carried out carefully and that a much better bridge design is needed than the one that has been put forward. In the document Environmental Appraisal (3687kb pdf) Scottish Natural Heritage are reported to have advised that:</p> <p><i>“The physical integrity of the site could, however, be safeguarded if:</i></p> <ul style="list-style-type: none"> • <i>The road is elevated above the level of the esker ridge with sufficient headroom to allow pedestrian access underneath.</i> • <i>The embankment doesn’t encroach on to the esker ridge</i> • <i>There are no piers within the footprint of the esker.”</i> <p>These recommendations have been ignored in the preparation of the high level bridge [Option 7]. Another detailed proposal:</p> <p><i>“• Include mitigation such as badger/otter crossings where the route passes through their territory ie on the stretch of road from Dores Road Roundabout up to the River Crossing”</i></p> <p>Is more demanding for Option 7 than Option 6 but near the river Option 7 is on piers and so there is almost unrestricted access whereas Option 6 has a considerable length of road on an embankment running parallel to the river which is a much serious problem that is not specifically acknowledged.</p>	<p>The mitigation related to lighting etc is considered appropriate as the light can potentially effect the Atlantic Salmon.</p> <p>The bridge designs for all options shown at the consultation were indicative.</p> <p>This option 6 provides open space between the river and canal and as such allows access to the riverside to be maintained.</p>
<p>Option 1 In spite of a long length of new road being built close to the canal, the noise and visual effect of this, the barrier it creates between the canal and the large area used for recreation on page 6 it states: <i>“... positive significant affects on Population and Human Health.”</i> and on page 85:</p>	<p>This SEA objective is related to the maintenance and enhancement of active travel and recreational access opportunities and does not consider noise.</p>

<p><i>"... neutral affect on the recreational access around and on the Caledonian in the medium and long term ..."</i></p>	
<p>Option 2 In spite of a long length of new road being built through the middle of a large recreation area which is free of traffic and the disruption to movement this will cause on page 6 it states: <i>"... significant positive affects on Population and Human Health."</i> on page 89: <i>"... neutral affect on the recreational access around and on the Caledonian Canal in the medium to long term ..."</i> and on the same page I wonder how a slightly longer road through the golf course can result in: <i>"Recreational access to the wider area will be improved ..."</i> The Justification for Objectives 3 and 4 on page 88 are the wrong way round.</p>	<p>The SEA objective related to population and human health was elated solely to active travel and recreational access opportunities. Inconsistencies in the SEA have been addressed through the Finalised Environmental Report.</p>
<p>Option 3 Excavation of steeply sloping woodland site to widen the road will be necessary so that: <i>"Each approach leg will have 2 lanes"</i> [detail on map Proposed Design Option 3] and I hope that the pavement will be widened and/or a new one created on the other side of the road. No widening of the road is shown on the map but this work will require a substantial retaining wall. This woodland is protected by a Tree Preservation Order and may be used by red squirrels which on page 26 are listed as a: <i>"... priority species in the UK BAP ..."</i> On page 91 there is: <i>"This option will provide a very limited opportunity for further development and therefore it is unlikely that there will be a greater impact on the landscape when looked at cumulatively."</i> Is not relevant to the full assessment, it might have some relevance to secondary effects but the intention of the project is to provide a link across the river and canal and not to provide roads within developments. Only options 3, 4 and 5 do not involve construction on land allocated for housing and on page 6 it says: <i>"... may have no significant affects."</i> but on page 92 it says: <i>"This option is largely negatively scored. There are no anticipated significant affects either positive or negative."</i> Does this mean that scores from a single + through +/- and = to a single - can be ignored and only double ++ and double - - are significant.</p>	<p>The purpose of SEA is to consider the significant effects of a plan, programme or strategy. The more minor effects are still considered as they may have a cumulative effect.</p>
<p>Option 4 Excavation of steeply sloping woodland – comments as for Option 3. Option 4 has a substantial length of new road through the golf course so to repeat the statement that is in Option 3 is wrong [see page 95]: <i>"... there will be very limited amount of new road built and it is contained within a small area."</i></p>	<p>Noted.</p>

<p>Option 5 Excavation of steeply sloping woodland – comments as for Option 3. Option 5 has a substantial length of new road through the recreation area and the golf course so to repeat the statement of option 3 is wrong [see page 99]: “... there will be very limited amount of new road built and it is contained within a small area.”</p>	<p>Noted.</p>
<p>Option 6 On page 104 it states: “... may have a neutral affect on the recreational access around and on the Caledonian Canal in the medium to long term ... Recreational access to the wider area will be improved in the medium to long term ...” Building a road on an embankment alongside the canal and the river will destroy it as an area for quite recreation. Between the Dores Road and Glenurquhart Road roundabouts there are 4 other roundabouts which are not ideal for walkers and cyclists to negotiate [Why are the Holm Mains and Weir roundabouts needed? – I did not believe the explanation that was given at a public meeting by a road engineer]. On page 104 it states: “... will provide a shorter river and canal crossing therefore increasing the attractiveness of active travel ... making it easier to follow the cycle route which currently runs alongside the existing Southern Distributor Road and extend this to cross the river/canal.” Options 1 to 5 would give a shorter route but as the cycle route is not mentioned in these I assume that they should all have the lack of this as a negative feature. Why does option 6 have no comment about loss of development ground due to the roadway on agricultural ground? The statement on [page 6] “... buy [sic] significantly positive affects on Population and Human Health.” Is too favourable – it should be neutral or negative because of the loss of quiet recreation. There is no acknowledgement that the road alongside the river is built on an embankment in the flood plain of the river and so no indication of what adverse effect this might have.</p>	<p>Noted. The impacts described are likely on the amenity of the area rather than the recreational access opportunities and active travel opportunities of the area which is considered by this SEA objective.</p>
<p>Option 7 The following changes would make this option more attractive [they will make a better design and are not suggested as mitigation features]: A - Remove short crossing of the canal near Tomnahurick Swing Bridge to reduce cost B – Remove pier from half way up steep face of esker and replace it with one on edge of canal and/or one in the quarry C – Only have pavement/cycleway on one side of bridge to reduce cost D - Modify Dores Road roundabout so that road goes in straight line E - Replace embankment south of river with piers F - Replace embankment in quarry with piers to provide parking underneath G – Perhaps include low level pedestrian/cycle bridge across river above flood height H – Perhaps include steps from bridge to either side of canal It appears that Option 7 has been designed to make it as unattractive as possible and has been subjectively scored to make it as undesirable as possible – [page 109]:</p>	<p>These comments are noted. These comments have been passed to TEC Services as they are related to the design project rather than the Strategic Environmental Assessment. It is accepted if these changes are made that the option would score less negatively but this option was not under consideration and as such has not been subject to SEA.</p>

<p><i>“This option is largely scored as significantly negative. There is a greater impact on cultural heritage and minimal benefits through this option for active travel.”</i></p> <p>On page 106 it states: <i>“...moderate to major loss of mature woodland, trees ...”</i></p> <p>The woodland is mainly on a worked out quarry and therefore is recent and is not subject to any designation. Loss of habitat reduced and no problems near Tomnahurick so SEA 1 is at least neutral. No major embankment needed so negative effects of SEA 2 is reduced. A bridge on pillars could be an attractive feature and so the SEA 3 is less negative because the Tomnahurick crossing has been removed. Not building embankments will significantly reduce negative impact and without additional short crossing may make SEA 4 neutral. On page 109 it says: <i>“...current access enjoyed here may be adversely affected in terms of amenity given the noise of the bridge crossing.”</i></p> <p>For other options noise of a new road alongside the river or canal which are core paths is not considered relevant but for a footpath in the quarry near the A82 it is. Including proposals A to G should increase SEA 5 to slightly positive and if a link to either side of the canal can be constructed [proposal H] then it could be significantly positive. By removing the extra canal crossing this Option 7 is the only road proposal that does not involve building an embankment in the flood plain.</p> <p>Page 110 Mitigation includes: <i>“Sensitive micro-siting of an [sic] bridge piers [sic] to avoid impact on SSI [sic]”</i></p> <p>Micro-siting is not a lot of use when it is in the middle of the slope of the esker.</p>	
<p>Option 8 On page 112 it states: <i>“Given this option will bring a change to the existing landscape character of the area that there will be a negative impact at a very local level. This is somewhat limited as there will be very limited amount of new road built, the crossing is below the canal and it is contained within a small area”.</i></p> <p>The aqueduct might be short but this is only a small part of the new road needed for the whole of option 8. Disrupting recreational use of an area by constructing an aqueduct and a new road through it then to score it +/- is wrong. It appears that the roundabout near the river is in the flood plain [see map on page 63] and is not built on an embankment [see map Proposed Design Option 8] and so the aqueduct could be flooded.</p>	<p>It is considered that the negative effect will be at a local level despite the amount of road above ground. The issue of flooding has not been considered through this SEA, that will be a matter for the detailed design of a final route.</p>
<p>Option 9 On page 5 it states that if the project not implemented then: <i>“Limited opportunity for development leading to faster expansion of the city rather than first consolidating the city which may lead to an adverse impact on the environment;”</i></p> <p>And so effect on biodiversity cannot be considered as neutral as it is scored on page 115.</p>	<p>Noted.</p>
<p>PAGES 42-47 ASSESSMENT OF ALTERNATIVES - CUMULATIVE</p>	<p>Noted. Clarification has been given in the finalised</p>

<p>EFFECTS</p> <p>On page 42 there is a table indicating the extent of land that will be made available for development in 3 levels for the different options but there is no map to support this. Options 3, 4 and 5 are Low level because: <i>“... limited development at Ness-side.”</i></p> <p>whereas Options 1, 2 and 8 are Medium level because: <i>“... limited land at Ness-side.”</i></p> <p>Without a map it is impossible to work out the difference between the words development and land. Option 7 is Medium level because: <i>“... limited land at Ness-side as a large area of the site would be lost to earth works.”</i></p> <p>but Option 6 has a much longer length of road and 2 additional roundabouts and is the only Option classed as High level.</p>	<p>environmental report as to why each option has the level of development set out.</p>
<p>The document SEA – Land Use Framework (3405kb pdf) seems to indicate a similar area of land indicated for development. The document seem to suggest that the golf course between the A82 and Torvean should be developed as an urban village – this seems to be backdoor way of zoning this area of land for development. The maps for Options 1 to 5 and 8 all show all of the land at Ness-side as available for development. Option 6 has the area to the west and north west of the road shown as Recreational Area and a massive area near the road in Option 7 is Green Wedge. I am unable to understand the map for Option 9 because it uses a different colouring scheme for the options. Because of the similarity of the colouring of different categories and because the colours in the legend differ from the shading on the map it is difficult to be certain of what the maps show. A final criticism is that the colouring of certain features are different, Amenity Green Space [purple to green], Outdoor Sports Faculty [brown to blue/green], Tree Preservation Orders [from blue to green] and Core Paths [green to yellow so that it impossible to distinguish them from minor roads]. This document is not mentioned in the SEA document and has not been sent to SEA Gateway and so cannot be part of the formal assessment. The information that it contains should be part of the SEA because it should be the explanation of the Low, Medium and High level on development on page 42 but it fails to do this,</p>	<p>As previously stated these are not part of the SEA. The Inner Moray Firth Local Development Plan will be the place that any new land use framework for the area is brought forward.</p>
<p>All proposals except Option 7 involve building a crossing of the river which involves 2 bridge supports being constructed in the river. This will have significant short term effects and there will be some long term modification of the flow of the river because of these permanent obstructions. A low level bridge will have different shading effects compared with a high level bridge. This subject has been ignored.</p>	<p>Noted. These will be detailed considerations at the project design stage however mitigation has been included in the SEA to cover these issues.</p>
<p>Should the long term effects of development on the landscape be related to the choice or road at all? The decision to zone land for development is a separate matter and houses to service it are a necessary part of the development. Whether there is a new crossing of the river and canal will not affect how the houses look but if certain road options are used as an excuse to zone new areas of land for development then that is a different matter but that should not be achieved by a devious backdoor method.</p>	<p>As stated above any new land use framework will need to be brought through the Inner Moray Firth Local Development Plan. The impact on the landscapes needs to be considered as the road has a direct impact on the level of land which can be released. The more land</p>

	released for development the greater the impact will be on the landscape.
<p>Option 1 Pages 43 and 121 include: “... would not lead to significantly different affects ...” but page 119 has: “... likely that there will be a loss of habitat including possible fragmentation of habitat ...” The score for biodiversity has been changed so the result is different so pages 43 and 121 are wrong: SEA Objective 1 Long Term changed from - to --</p>	Noted. Inconsistencies have been addressed in the Finalised Environmental Report. The views on the scoring are noted.
<p>Option 2 Pages 43 and 124 include: “... would not lead to significantly different affects ...” but page 122 has: “... likely that there will be a loss of habitat including fragmentation of habitat ...” There are no changes to the scores because the Medium and Long term scores for SEA Objective 1 were already - - but the Local score could have been increased from - .</p>	Noted. Inconsistencies have been addressed in the Finalised Environmental Report. The views on the scoring are noted.
<p>Option 3 Page 44 includes: “... would not lead to significantly different affects ...” does not agree with the Commentary [page 127] which says: “...would not lead to significantly different affects ...except in terms of landscape affects which would be greater ...” and on page 126: “This option considered in line with the potential for development out of this option at Charleston expansion site would lead to a greater change in the landscape which is may lead to a significantly adverse affect in the medium to longer term at a local level.” The statement refers to a Low level of development [page 42] whereas Medium level of development in Options 1 and 2 does not get an adverse comment – THIS IS INCONSISTENT. SEA Objective 4 Medium Term, Long Term and Local changed from to</p>	Noted. Inconsistencies have been addressed in the Finalised Environmental Report.
<p>Option 4 Comments and quotations about landscape are the same as for Option 3. Page 128 as Justification on Objective 1 includes: “...likely that there will be a loss of habitat including possible fragmentation of habitat in the longer term ...” These adverse comments are not in the summary and in spite of them the scoring has been made more attractive – THIS CANNOT BE CORRECT: SEA Objective 1 Short Term changed from - to =</p>	Noted. Inconsistencies have been addressed in the Finalised Environmental Report. The views on the scoring are noted. As previously stated the summary is a summary of the whole assessment and as such will not include all of the details of the assessment.

<p>SEA Objective 1 Medium Term and Long Term changed from -- to -</p>	
<p>Option 5 Pages 45 and 133 include: <i>“...except in terms of landscape affects...”</i> Page 132 has the same comment as for Options 3 and 4: <i>“This option considered in line with the potential for development out of this option at Charleston expansion site would lead to a greater change in the landscape which is may lead to a significantly adverse affect in the medium to longer term at a local level.”</i> SEA Objective 4 Medium Term, Long Term and Local changed from - to -- in Appendix 5 [page 132] but not in the report [part 45] – THIS IS INCOMPETENCE. Page 131 as Justification for Objective 1 includes; <i>“...likely that there will be a loss of habitat including possible fragmentation of habitat in the longer term ...”</i> These adverse comments are not in the summary and in spite of them the scoring has been made more attractive – THIS CANNOT BE CORRECT: SEA Objective 1 Short Term changed from - to = SEA Objective 1 Medium Term and Long Term changed from -- to - page 132 as Justification on Objective 5; <i>“... likely to lead to the development of additional active travel routes however it is unlikely that this would lead to any greater of an affect than that of just the road option.”</i> In spite of this neutral comment the scoring have been made more attractive – THIS CANNOT BE CORRECT: SEA Object 5 Short Term, Medium Term, Long Term and Local changed from - to +/-</p>	<p>Noted. Inconsistencies have been addressed in the Finalised Environmental Report. The views on the scoring are noted. As previously stated the summary is a summary of the whole assessment and as such will not include all of the details of the assessment.</p>
<p>Option 6 Page 45 includes: <i>“...except in terms of landscape affects...”</i> but there is no concern about landscape on page 135: <i>“... the affect will be any greater than that of road delivery in isolation.”</i> and in the Commentary on page 136 but the score has been improved - WHY?: SEA Objective 4 Short Term has been changed from -- to - Page 134 as comment on Objective 1 includes: <i>“...likely that there will be a further loss of habitat including possible fragmentation of habitat in the medium to long term ...”</i> These comments are not in the Commentary on pages 136 and 45 but have resulted in the score being adversely affected [which may be right but in that case it should be in the summaries]: SEA Objective 1 Medium Term and Long Term changed from - to --</p>	<p>Noted. Inconsistencies have been addressed in the Finalised Environmental Report. The views on the scoring are noted.</p>
<p>Option 7 Pages 46 and 136 include:</p>	<p>Noted. Inconsistencies have been addressed in the Finalised Environmental Report.</p>

<p>“...except in terms of increased opportunities for recreation/active travel as the routes through any new development will help create new opportunities....”</p> <p>but no changes have been made to any scores of SEA Objective 5.</p> <p>Page 137 includes:</p> <p>“...likely that there will be a further loss of habitat including possible fragmentation of habitat in the medium to long term ...”</p> <p>but not in summary [pages 46 and 139] but in spite of this the score has been adversely affected [which may be right but in that case it should be in the summaries]:</p> <p>SEA Objective 1 Medium Term and Long Term changed from - to --</p> <p>Page 138 includes:</p> <p>“...no affect greater ...”</p> <p>but still there has been a change - WHY SCORE MADE WORSE?:</p> <p>SEA Objective 3 Regional changed from - to --</p>	
<p>Option 8</p> <p>Page 46 includes:</p> <p>“...except in terms of slightly increased opportunities for recreation/active travel as new routes may be created through the any new development but this would be limited given the limited development which could take place.”</p> <p>and page 141 has something similar:</p> <p>“It is likely that development of the allocated sites may lead to further paths which would create linkage to the wider area. However, these would be limited in their scope and in there benefit as they will be mostly on the north of the river and canal with few on the south.”</p> <p>but in spite of these favourable the score has been made worse:</p> <p>SEA Objective 5 Medium Term and Long Term changed from +/- to -</p> <p>Page 140 includes :</p> <p>“...likely that there will be a further loss of habitat including possible fragmentation of habitat in the medium to long term ...”</p> <p>but there is nothing about this on pages 142 and 46 and so WHY IS SHORT TERM WORSE?:</p> <p>SEA Objective 1 Short Term and Local changed from - to --</p> <p>Page 140 includes:</p> <p>“...will have no affect ...”</p> <p>and soil is not mentioned on pages 142 and 46 and so WHY SCORE MADE SO DIFFERENT?:</p> <p>SEA Objective 2 Regional changed from = to --</p> <p>Page 141 includes:</p> <p>“...not anticipated that the affect will be any greater than that of road delivery in isolation.”</p> <p>and landscape not mentioned on pages 142 and 46 so WHY HAVE 4 SCORES BEEN MADE WORSE?:</p> <p>SEA Objective 4 Short Term, Medium Term, Long Term and Local changed from - to --</p>	<p>Noted. Inconsistencies have been addressed in the Finalised Environmental Report.</p>
<p>Option 9</p>	<p>Noted. Inconsistencies have been addressed in the</p>

<p>Page 47 includes: <i>“...except in terms of slightly increased opportunities for recreation/active travel...”</i> and in the Commentary on page 145: <i>“...in terms of improved active travel/recreational access route.”</i> and so the improvement in the scores would be expected: SEA Objective 5 Long Term changed from - - to - but the Justification for this Objective is one very long sentence with no punctuation which means what? Page 143 SEA 1 includes: <i>“...likely that there will be a loss of habitat including possible fragmentation of habitat in the medium to long term ...”</i> but this is not mentioned in pages 47 and 143 - WHY ARE 3 SCORES MADE WORSE?: SEA Objective 1 Medium Term, Long Term and Local changed from = to - Page 144 SEA 4 includes: <i>“...likely to have a negative affect on the landscape character and local distinctiveness. It is not considered that this would be significant given the low level of development this option would facilitate.”</i> but this is not mentioned in pages 47 and 143 - WHY ARE 4 SCORES MADE WORSE: SEA Objective 4 Short Term, Medium Term, Long Term and Local changed from = to -</p> <p>On page 53 it states: <i>“Note: Items highlighted in grey are longer term items which we seek to monitor as and when resources become available.”</i> Where are the items highlighted in grey?</p> <p>On page 149 it states: <i>“Consideration should be included of users of the Great Glen Way, the Great Glen Canoe Trail and the River Ness, all of whom stand to be affected by the proposals.”</i> Where are the Great Glen Way and the Great Glen Canoe Trail mentioned?</p>	<p>Finalised Environmental Report.</p> <p>The grey boxes are in the monitoring table on the next page. This has been clarified in the revised environmental report.</p> <p>This was a comment from SNH.</p>
<p>SEPARATE WEBSITE DOCUMENT SEA - Land Use Framework (3405kb pdf)</p> <p>This is a separate document on the website which gives more information but it is not part of the SEA because it is not referred to in the SEA, has not been sent to SEA Gateway and so is not part of the formal SEA which was advertised.</p> <p>With computers it is possible to add a lot of information on to one map but when this is printed it can be impossible to interpret and this is the case with the <i>“Inverness West Link Design Constraints”</i> on page 1. Many of the items in the Legend have been reduced to short abbreviations such that they are meaningless [Approximate extent – Uncertain extent – A – B – C – C(S)]. It is impossible to separate some items [Core Paths – Conservation Areas, and the many green areas] and in some places several shadings are applied to the same area.</p>	<p>These are comments on a separate document which was prepared to aid understanding of how the chosen option may change the development potential of the area. This document is not part of the SEA the title of the document on the website is wrong.</p>

A map should aid understanding not confuse – the information should be shown on about 3 separate maps to be understandable.

Assumptions [page 2] says “Further investigation needs to be undertaken to establish if Ness-side south can be used for housing given the access issues for pedestrians and cyclists.” What are the boundaries of this area and what are the access issues?

No mention in the options of:

- effect of building a bridge over the river with piers in the water
- building houses in the flood plain
- destroying the approach into Inverness by building a large car park [park and ride] on one side of the road and an urban village [=dense housing] on the other

Road Option	Development Potential SEA [page 42]	SEA - Land Use Framework
1	Medium	Opportunities – Increased housing land availability [page 3]
2	Medium	Opportunities – Increased housing land availability.. [page 6]
3	Low	Strengths – Maintains similar housing and other... [page 9]
4	Low	Strengths – Maintains similar housing and other... [page 13]
5	Low	Strengths – Maintains similar housing and other... [page 17]
6	High	Weaknesses – Current land allocations severed [page 21]
7	Medium	Weaknesses - Decrease in housing land availability.[page24]
8	Medium	Weaknesses – Current land allocations severed [page 27]
9	Low	Weaknesses – Limits the expansion land ...developed [page 30]

Additional comments were received which considered a revision to option 7. These were passed to Transport, Environment and Community Services for consideration.

Reasons for choosing the Highland-wide Local Development Plan as Adopted, in the light of other reasonable alternatives

Option 6 has the potential to ensure a positive impact on the environment as it contains measures which will ensure it can meet the Strategic Environmental Assessment Objectives as well as the Strategic Transport Appraisal Guidance Objectives.

While it was not considered an option to not have a river and canal crossing to the south west of Inverness, there were a number of alternative crossing options which have been considered. In the case of these alternatives, the option which was most environmentally sensitive while also balancing other competing needs such as sustainable economic growth (albeit outwith the scope of the SEA process) was brought forward.

The main focus of this Strategic Environmental Assessment has been on the future development of the river and canal crossing for south west Inverness and the immediate locality however the effects of the river and canal crossing will extend to a wider area covering the city of Inverness.

A number of related plans, policies and strategies were identified and have been used to better inform the final chosen option for the Inverness West Link Road.

Measures that are to be taken to monitor significant environmental effects of the implementation of the Highland-wide Local Development Plan

Section 19 of the Environmental Assessment (Scotland) Act 2005 requires the Responsible Authority to monitor significant environmental effects of the implementation of the Highland-wide Local Development Plan. This must be done in such a way as to also identify unforeseen adverse effects and to take appropriate remedial action.

It is considered good practice for monitoring:

- fit a pre-defined purpose, help to solve problems, and address key issues;
- is practical and is customised to the PPS;
- is transparent and readily accessible to the public;
- is seen as a learning process and a cyclical process relating closely to the collation of the environmental baseline.

For this monitoring to be effective it will need to be linked to both the SEA Objectives and the STAG Objectives. The baseline data set out earlier in this report sets the scene for any monitoring which is to take place. Below is a monitoring framework, the table below only considers indicators relevant to the state of the environment.

Note: Items highlighted in grey in the table below are longer items which we seek to monitor as and when resources become available.

SEA Topic	What the project seeks to achieve	Monitoring Indicator	Responsible for Data Collation	Publication of Monitoring	Remedial Action
Soil	Limited impact on an geologically important site.	Impact on the physical and the visual integrity of the esker ridge and the wider SSSI	THC (TEC Services) supported by data from site condition monitoring reports from SNH	Biennially	Review mitigation measures put in place.
Biodiversity	Protection and enhancement of biodiversity in Highland		THC (Information and Research)	Annually	Review Mitigation measures put in place
	Protected Species are not significantly disturbed		THC/SNH	Annually	Review policy and site allocations in Local Development Plan(s).
Human Health	Improve active travel / recreational access linkages	% travelling to work/study by car	THC (Information and Research)	Biennially	Review wider active travel linkages
		% travelling to work/study by active travel	THC (Information and Research)	Biennially	Review wider active travel linkages
	Protection and enhancement of public access	Number of path identified in the core path plan affected by chosen option in the long term	THC (Information and Research facilitated by access officers)	5 yearly	Secure enhancements to additional routes/improvements to those which have been affected.

Conclusion

It is considered that the Strategic Environmental Assessment of the Inverness West Link Design Project has added significant value to the decision making process by ensuring the chosen route gives due consideration to environmental objectives and works with other plans, programmes or strategies to maintain, enhance and protect the environment. The SEA has led to the consideration and inclusion of a number of pieces of mitigation which will ensure that negative effects of the river and canal crossing can be offset and positive effects are maximised.