

A87 Clachan Duich Refurbishment
F565 Habitats Regulations Appraisal
Proforma

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A87 Clachan Duich Refurbishment	
Document:	Form 565 Habitats Regulations Appraisal Proforma
Issue:	#1
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Document Control Sheet

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Appraisal in relation to regulation 48 of the Conservation (Natural Habitats, &c.) Regulations 1994 as amended (Habitats Regulations Appraisal)

(Or, where relevant, under regulation 61 of The Conservation of Habitats and Species Regulations 2010 as amended, or regulation 25 of The Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007 as amended)

European Site Details

Name of European Site(s) Potentially Affected

The following European sites are located within 2km of A87 Clachan Duich and may be affected by works. Please note that Marine Protected Areas for Nature Conservation (MPA NC) are included although technically are not subject to HRA.

1. Lochs Duich, Long and Alsh Reefs Special Area of Conservation (SAC) (NatureScot Site ID: [8309](#))
2. Lochs Duich, Long and Alsh MPA NC (NatureScot Site ID: [10416](#))

In addition, the following European site is located within 12km of A87 Clachan Duich and has been scoped in for further assessment as works may have a pathway to effect due to the nature of the qualifying feature and hydrological connectivity.

3. Inner Hebrides and the Minches SAC (NatureScot Site ID: [10508](#))

Name of Component SSSI, if Relevant

Kinloch and Kyleakin Hills (Monadh Chaol Acainn is Cheann Loch) Site of Special Scientific Interest (SSSI) (Site ID [8173](#)) is a component of the Lochs Duich, Long and Alsh Reefs SAC; however, this has been scoped out of further assessment as no pathway to effect was identified due to the nature of the qualifying habitat features and distance from the area of works (approximately 15km west of the scheme).

European Site(s) Qualifying Interest(s) and Whether Priority or Non-Priority

Details of qualifying features and conservation status are listed for each of the European sites noted above and were assessed on 10/11/2025 from NatureScot's [SiteLink](#). Priority qualifying features are denoted below by (*).

1. Lochs Duich, Long and Alsh Reefs SAC

- Reefs*
 - Negative pressures: other
 - Latest assessed condition: unfavourable declining (Mar 2005)

2. Lochs Duich, Long and Alsh MPA NC

- Burrowed mud*
 - No condition assessment provided
- Flame shell beds*
 - No condition assessment provided

3. Inner Hebrides and the Minches SAC

- Harbour porpoise (*Phocoena phocoena*)*
 - Negative pressures: none
 - Latest assessed condition: favourable maintained (Apr 2020)

Condition assessments for all features were accessed via [SiteLink](#) on 10/11/2025.

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Conservation Objectives for Qualifying Species

The following conservation objectives are taken from supporting documents (i.e. 'Conservation Objectives' and/or 'Conservation Advice Package') for the below European sites, accessed via [SiteLink](#) on 10/11/2025.

1. Lochs Duich, Long and Alsh Reefs SAC

1. To ensure that the qualifying features of Lochs Duich, Long and Alsh Reefs SAC are in favourable condition and make an appropriate contribution to achieving Favourable Conservation Status.
2. To ensure that the integrity of Lochs Duich, Long and Alsh Reefs SAC is maintained in the context of environmental changes by meeting objectives 2a, 2b and 2c:
 - a. Extend and distribution of reefs within the site.
 - b. Structure and function of reefs and the supporting environment on which it relies.
 - c. Distribution and viability of typical species of reefs.

2. Lochs Duich, Long and Alsh MPA NC

1. The Conservation Objectives of the Lochs Duich, Long and Alsh MPA NC are that the protected features:
 - So far as already in favourable condition, remain in such condition; and
 - So far as not already in favourable condition¹, be brought into such condition, and remain in such condition.

3. Inner Hebrides and the Minches SAC

1. To ensure that the Inner Hebrides and the Minches SAC continues to make an appropriate contribution to harbour porpoise remaining at favourable conservation status.
2. To ensure for harbour porpoise within the context of environmental changes, that the integrity of the Inner Hebrides and the Minches SAC is maintained through 2a, 2b and 2c:
 - a. Harbour porpoise within the Inner Hebrides and the Minches are not at significant risk from injury or killing.
 - b. The distribution of harbour porpoise throughout the site is maintained by avoiding significant disturbance.
 - c. The condition of supporting habitats and the availability of prey for harbour porpoise are maintained.

¹ "Favourable condition", with respect to a marine habitat, means that a) its extent is stable or increasing; and b) its structures and functions, its quality, and the composition of its characteristic biological communities are such as to ensure that it is in a condition which is healthy and not deteriorating.

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Stage 1: What is the Plan or Project?

Proposal Title

A87 Clachan Duich Refurbishment

Name of Competent Authority

Transport Scotland, Marine Directorate

Name of Consultee

Consultation with Marine Directorate and a pre-application consultation with NatureScot will be carried out.

Details of Proposal

Inspection and sheet pile investigation works are scheduled to be undertaken on the A87 Clachan Duich bridge, north of the rural settlement of Invershiel, within the Highland Council local authority area (Figure 1). The scheme is located at national Grid Reference NG 94647 20847. The bridge spans Loch Duich, which is tidal at this location; therefore, the works will be operating in the marine environment and a marine licence is required.

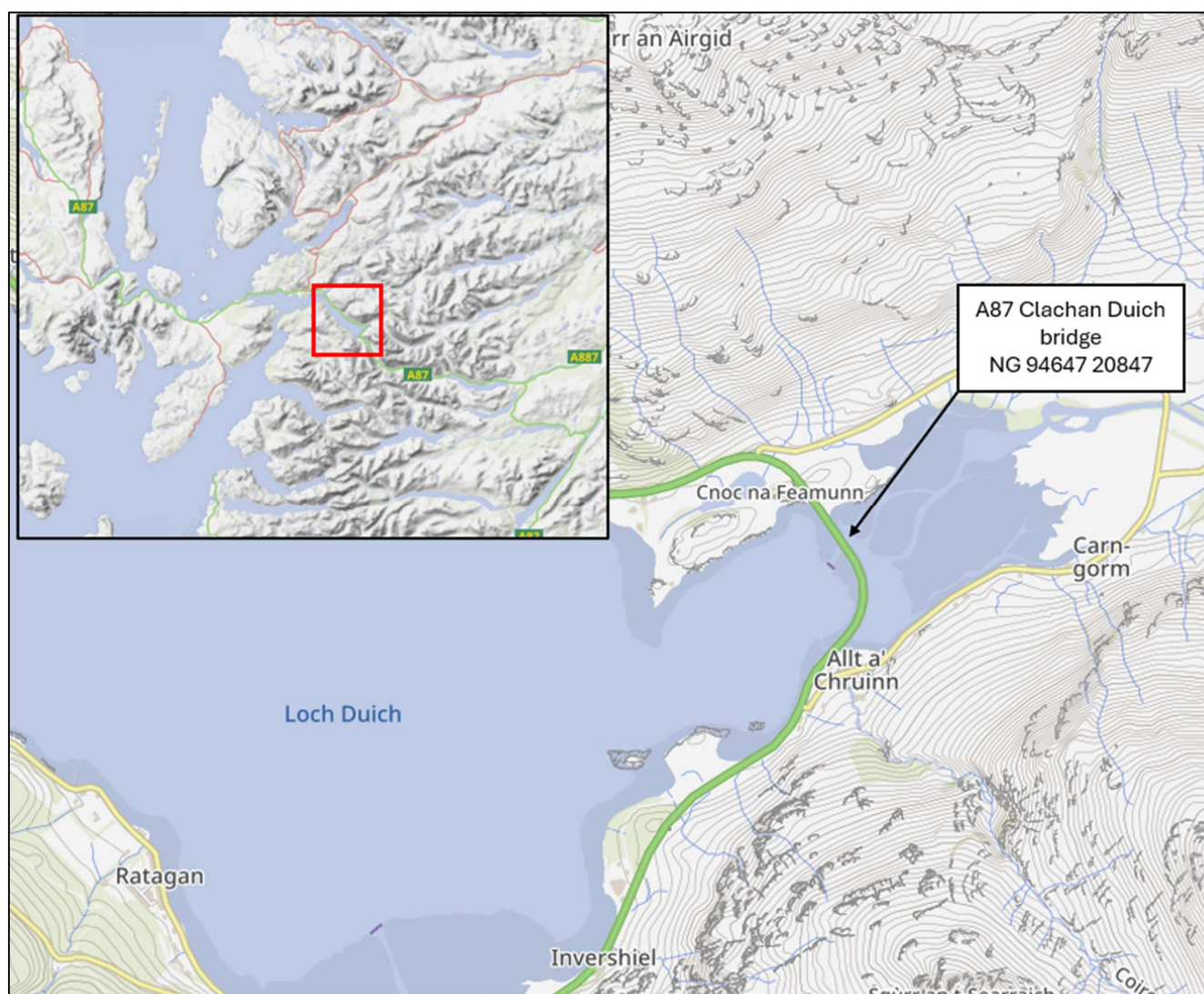


Figure 1. Location of A87 Clachan Duich bridge. Inset shows location on the west coast of Scotland. Source: [Marine Scotland](#)

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It is expected that the works will be undertaken in summer 2026. Works are currently programmed to commence from 01/06/2026, during daytime working hours (08:00-18:00), however the start date is dependent on issue of the marine licence. Traffic management will involve single-lane closure with two-way temporary traffic lights. Works are anticipated to have a duration of 10 days.

Works will involve the inspection and investigation of the sheet piles that surround the abutments and piers of the bridge to determine their integrity, thickness and depth. These measurements will determine the rate of corrosion of sheet pile cofferdams around the pier footings of the bridge, with a view of informing the potential need for future repair or replacement works.

To verify the depth of the existing sheet piles, boreholes will be drilled around each corner of the sheet pile cofferdam surrounding two piers and the abutments using drilling rigs positioned on the bridge deck (Figure 2). Boreholes will be drilled directly through the water to the riverbed until the required pile depth is reached. A temporary scaffold platform or proprietary access system will be erected on the deck to support the weight of the drilling rig, personnel, and associated equipment, with allowances for dynamic loads generated during drilling. The platform may be configured to cantilever beyond the bridge parapets using beams or counterweights to provide the required reach. Most works will take place from the bridge deck only, with some works requiring access beneath the bridge deck.

In line with health and safety requirements, all work carried out beneath the bridge will require an adequate working platform and edge protection to prevent falls of personnel or materials. Containment will be provided through debris netting or thickened sheets attached to the platform to prevent material from falling into the water. Additionally, floating double silt traps/curtains will be installed around the piers and abutments to contain silt created by drilling of boreholes. This will include weighted chains to keep curtains anchored to the seabed.

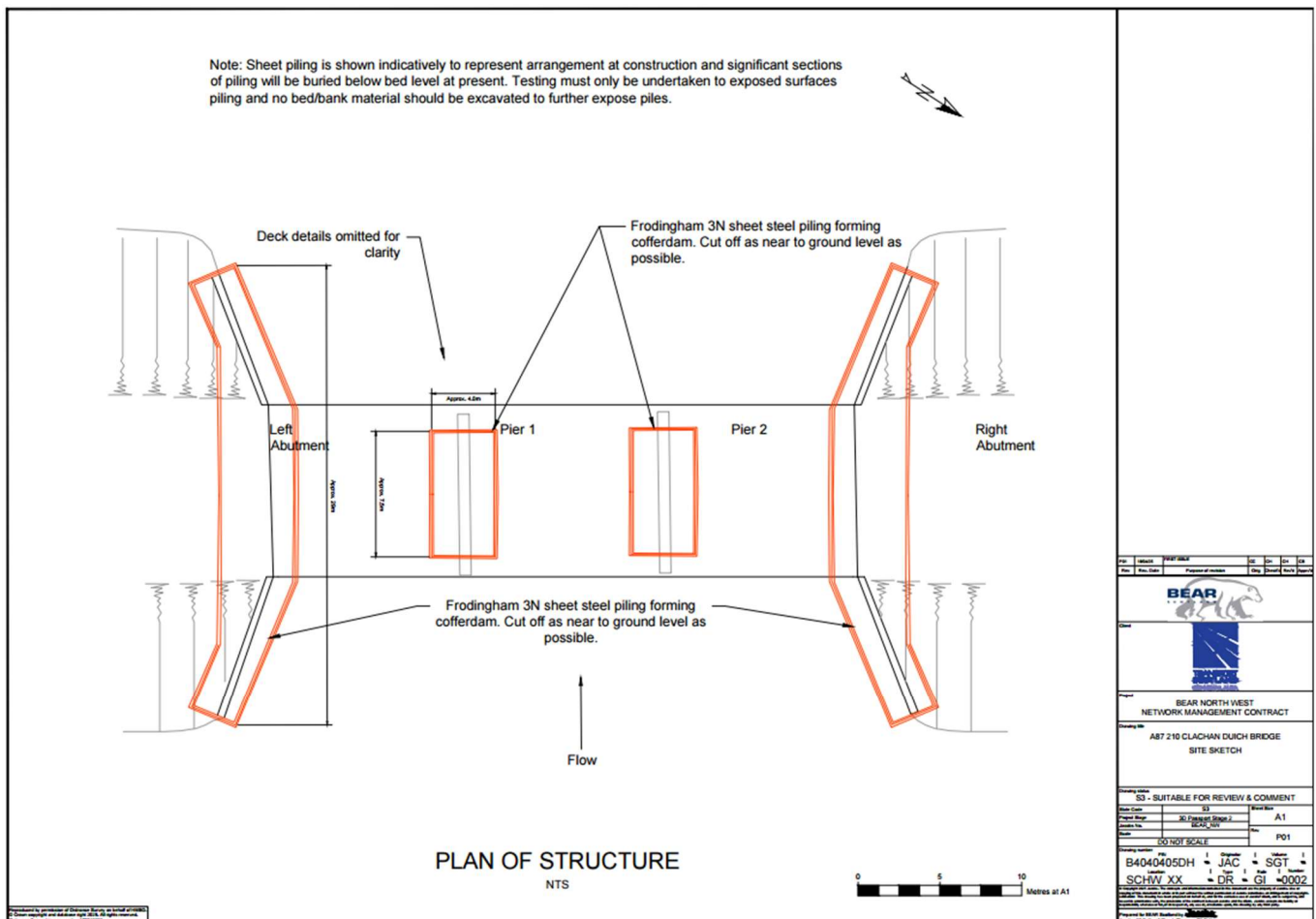


Figure 2. A87 Clachan Duich site sketch

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Integrity and sonic testing of the sheet piles will be undertaken from either small boats/vessels positioned along the structure, or from temporary fixed working platforms (e.g. scaffolding), which may be suspended from the bridge or footed on the ground below. Strict containment measures will be implemented to prevent pollution of the surrounding marine environment. These tests will entail the following:

- **Thickness measurement** of the sheet pile tops using callipers or a suitable alternative.
- **Integrity testing** using sonic echo methods to detect any defects, discontinuities, or damage along the pile length.
- **Thickness testing** of steel sections using ultrasonic or similar non-destructive methods.
- **Bathymetric survey** of the riverbed surrounding the bridge to record riverbed levels and ensure safe positioning of boreholes.

BEAR Scotland follow good practice guidance produced by the Scottish Environment Protection Agency (SEPA) as standard for works in or near water to reduce the risk of water pollution as much as possible. These measures will ensure that any potential pollutants, including fine sediments and materials required for the works in or near water, will not enter the water environment. In addition, good practice measures to reduce noise will be in place to comply with Section 72 of the Control of Pollution Act 1974 and BS5228-1:2009-A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites. These measures and working practices would be in place regardless of the presence of nearby designated sites and therefore are not considered to be mitigation. All relevant pollution controls and other good practice measures will be detailed in the Site Environmental Management Plan (SEMP) for each scheme and adhered to on site. Refer to **Appendix A** for details of these good practice measures.



Stage 2: Is the Plan or Project Directly Connected with or Necessary to Site Management for Nature Conservation?

Connection to Site Management

This test is to identify and remove from further assessment those proposals which are clearly necessary to, or of value to, or inevitable as part of, management of the site for its qualifying interests. For the majority of proposals competent authorities deal with the answer to Stage 2 will be 'no'. However, where it is thought this could be applicable the following points should be considered:

- I. Has the effect on all qualifying interests been considered?
- II. Is the proposal part of a fully assessed and agreed management plan? If not, then further consideration or supporting information will be required.
- III. Is there a clear rationale to justify the connection with the conservation objectives?
- IV. If there is a clear connection with the conservation objectives will any benefits arising from the proposal outweigh any negative effects?
- V. Have any alternative methods of implementing the proposal been explored, including building in any relevant mitigation, to demonstrate that this is the least damaging option?
- VI. Give a Yes / No conclusion in terms of whether the plan or project is considered directly connected with or necessary to site management for nature conservation.

If Yes for all elements of a plan or project, for all the European site qualifying interests (preferably as part of a fully assessed and agreed management plan), then consent can be issued. The rationale should be detailed below, and no further appraisal is required (no need to proceed to Stage 3 or 4).

If No for one or more European site qualifying interests then proceed to Stage 3.

If a plan has multiple elements (e.g., a range of policies or management objectives), elements of the plan considered directly connected with or necessary to site management for nature conservation should be discussed below and a rationale given for this conclusion. No further appraisal is then required for those elements. All other elements of the plan must proceed to Stage 3.

The works are not directly connected with or necessary to the management of any of the above designated sites for the purpose of nature conservation. Therefore, further assessment is required.

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Stage 3: Is the Plan or Project (Either Alone or in Combination with Other Plans or Projects) Likely to Have a Significant Effect on the Site?

Assessment for LSE

The test of Likely Significant Effect (LSE) is a simple screening stage to determine whether or not an appropriate assessment is required. Each qualifying interest must be considered in relation to their conservation objectives. The following points should be considered:

- I. Briefly indicate which qualifying interest could be affected by the proposal and how; if none, provide a brief justification for this decision, and then proceed to v), otherwise continue:
- II. consider whether there is connectivity between the proposal and each of the qualifying interests i.e. are there processes or pathways by which the proposal may influence the site's interests? Conclude no LSE only if there is no connection, or it is obvious that the proposal will not undermine the conservation objectives despite a connection. The potential for negative effects on the qualifying interests may be immediately obvious, in which case conclude likely significant effect and move straight to the next step.
- III. consider the nature, scale, location, longevity, and reversibility of effects.
- IV. consider whether the proposal contributes to cumulative or incremental impacts in combination with other plans or projects completed, underway or proposed.
- V. Where the impacts of a proposal are the same for different qualifying interests these can be considered together however a clear conclusion should be given for each interest.
- VI. give Yes / No conclusion for each interest.

If Yes, or in cases of doubt, continue to Stage 4.

If No for all features, a consent can be given and recorded below. There is no need to then proceed to Stage 4.

Remember if mitigation is required to prevent there being an effect on qualifying interests, then LSE must be concluded, and an appropriate assessment (Stage 4) must be conducted. Further guidance on the handling of mitigation can be found as part of the European site Casework Guidance.

Below is an assessment of the potential for Likely Significant Effects (LSE) of the proposed works on the qualifying features of the following designated sites:

1. Lochs Duich, Long and Alsh Reefs SAC – 800m southwest of the area of works
2. Lochs Duich, Long and Alsh MPA NC – 50m west of the area of works
3. Inner Hebrides and the Minches SAC – 12km northwest of the area of works

Assessment of the potential effects of the proposed investigation activities have been carried out below.

1. Lochs Duich, Long and Alsh Reefs SAC

This site is an extensive area of extremely sheltered reefs within a system of fjordic sea lochs in north-west Scotland. There is considerable diversity within the site, with areas of sheltered sublittoral rock supporting unusual assemblages of encrusting sponges and solitary ascidians, and, on shallower reefs, tide-swept kelp forests influenced by brackish water. Loch Duich is particularly notable for its well-developed communities of brachiopods and sea anemones on sheltered bedrock ([JNCC SAC Site Details](#)). The SAC is located 800m southwest of the area of works.

Assessment against the conservation objectives for reefs

Reefs within the SAC can include rocky reefs and horse mussel beds, a Priority Marine Feature. Both of these types of reefs are sensitive to physical disturbance, siltation, and smothering, all of which can kill or damage individual organisms and break up the reef structure (NatureScot (NS) 2024). Increased sedimentation can also negatively affect reefs by reducing water quality and oxygen flow (NS 2024). Reefs are present throughout Lochs Duich, Long and Alsh Reefs SAC; the closest is located 600m southwest of the area of works ([National Marine Plan Interactive](#); see Figure 3). There is a negligible risk of physical disturbance to reefs as a result of investigations and surveys,

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which will require drilling of boreholes into the riverbed A87 Clachan Duich Bridge. There is also a risk that water quality could be affected due to pollution or siltation events during investigation, particularly drilling boreholes. Consequently, the proposed works could contribute to pressures faced by reefs, which could in turn affect the conservation status of this feature within the SAC. **Therefore, LSE on reefs as a result of the proposed works cannot be ruled out, and this feature is considered further in Stage 4.**

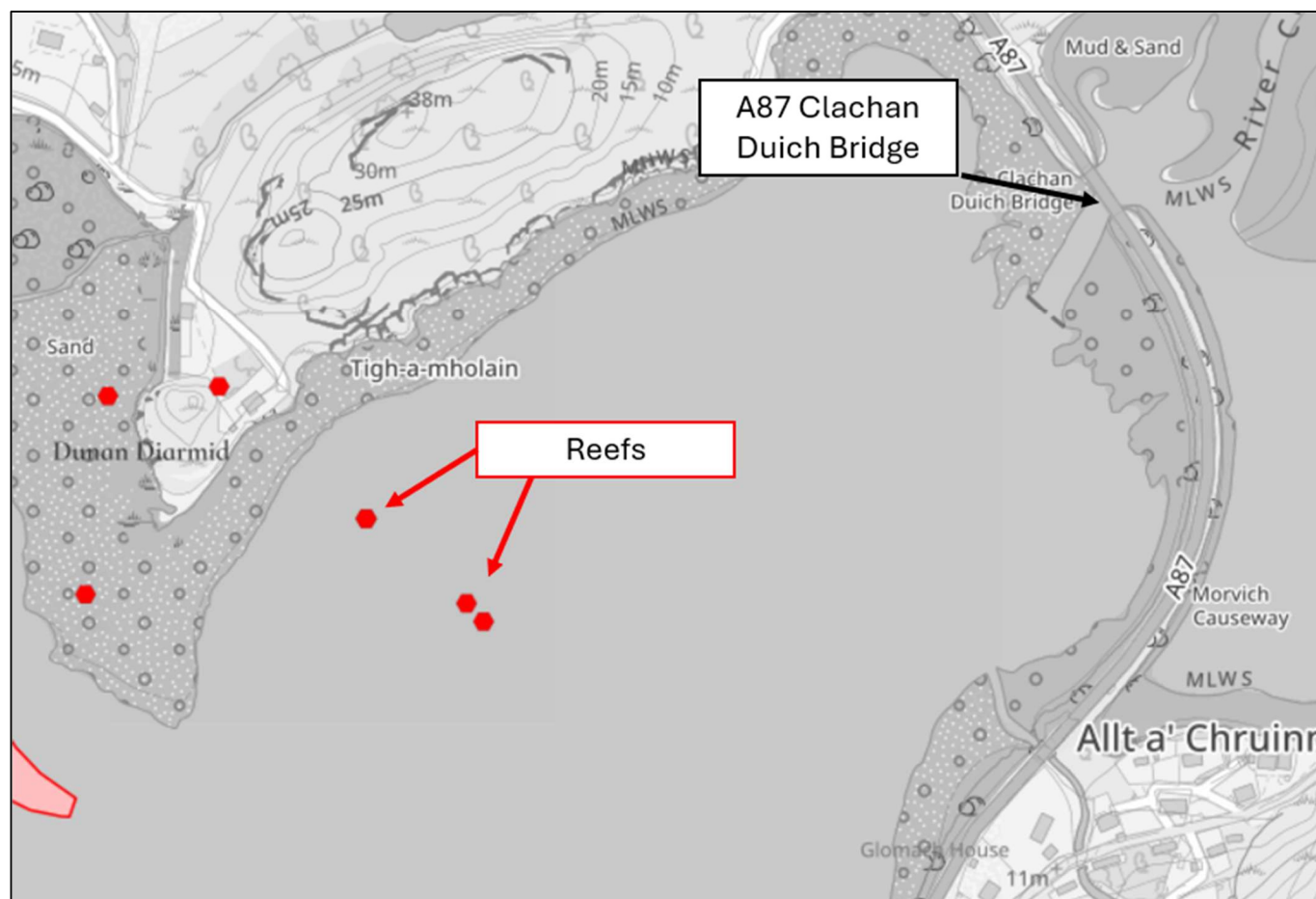


Figure 3. Location of nearest reefs within 600m of the A87 Clachan Duich Bridge. Source: [National Marine Plan Interactive](#)

2. Lochs Duich, Long and Alsh MPA NC

Lochs Duich, Long, and Alsh MPA NC covers three sea lochs on the west coast of Scotland, including Loch Long to the north, Loch Duich to the southeast, and Loch Alsh to the west. Lochs Duich, Long, and Alsh MPA NC is designated for burrowed mud and flame shell beds, which are both inshore sublittoral marine sediment features. It partially overlaps with the Inner Hebrides and the Minches SAC and Lochs Duich, Long, and Alsh Reefs SAC and forms part of Scotland's MPA network ([NatureScot Site Summary](#)). The MPA NC is located 50m west of the area of works.

Assessment against the conservation objectives for flame shell beds and burrowed mud

Flame shells are bivalve molluscs that form beds on areas of muddy gravel and sand, often where water currents are moderate or strong. Beds formed by flame shells consolidate the underlying sediments in the area and form a surface or reef to which other marine life can attach (Marine Directorate 2018). Flame shell beds are a Priority Marine Feature and are highly sensitive to physical disturbance which can kill or damage individuals and break up the bed structure. Increased sedimentation can also negatively affect flame shell beds by reducing water quality and oxygen flow (NS 2024). Flame shell beds within Lochs Duich, Long and Alsh MPA NC are known to be present in high densities mostly at the western end of Loch Alsh, however there are some records within Loch Duich, the closest being 2.8km southwest from the area of works ([National Marine Plan Interactive](#); see Figure 4). There is a negligible

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risk of physical disturbance to flame shell beds as a result of investigations and surveys, which will require drilling of boreholes into the riverbed A87 Clachan Duich Bridge. There is also a risk that water quality could be affected due to pollution or siltation events during investigation, particularly drilling boreholes. Consequently, the proposed works could contribute to pressures faced by flame shell beds, which could in turn affect the conservation status of this feature within the SAC. **Therefore, LSE on flame shell beds as a result of the proposed works cannot be ruled out, and this feature is considered further in Stage 4.**

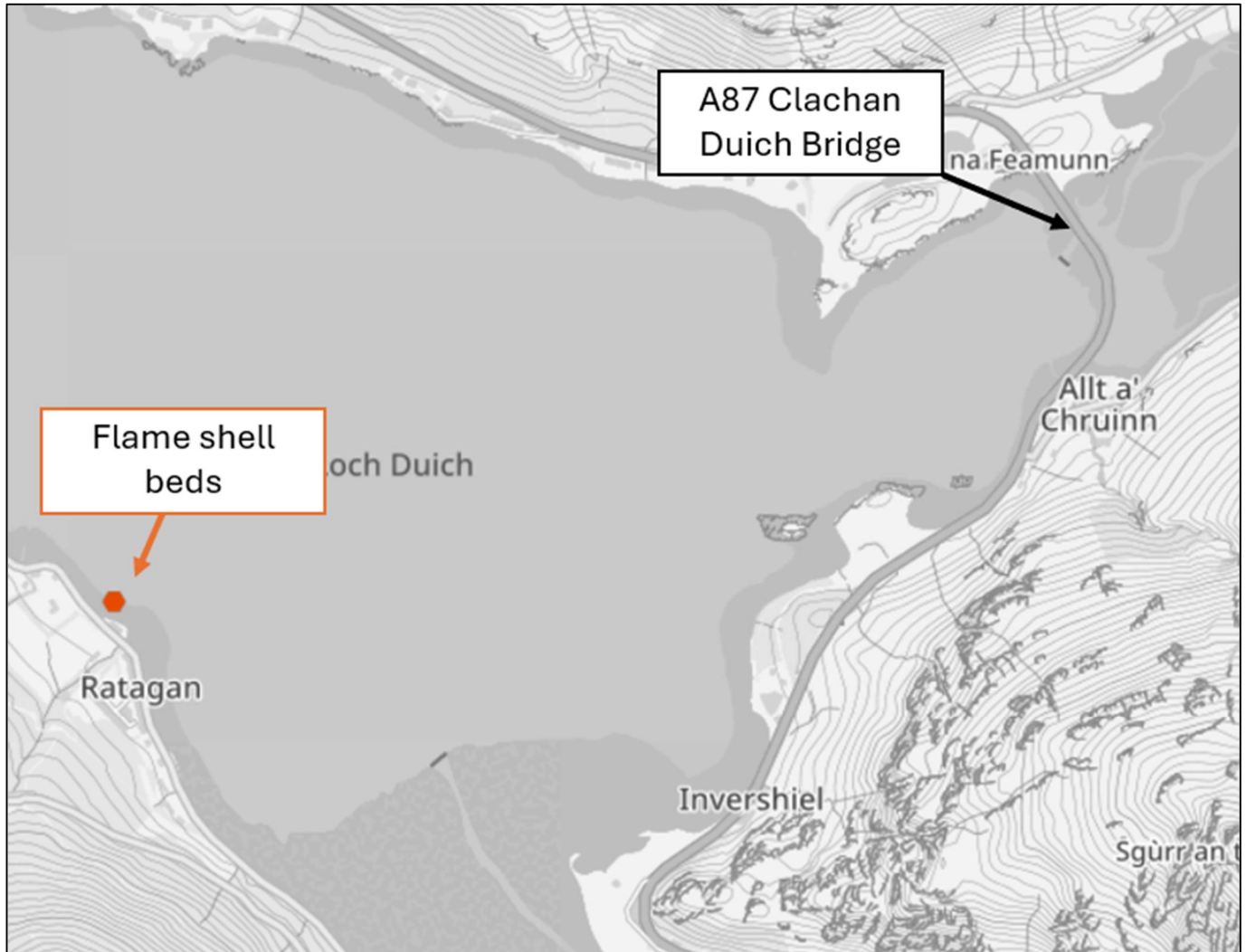


Figure 4. Location of nearest flame shell beds within 2.8km of the A87 Clachan Duich Bridge. Source: [National Marine Plan Interactive](#)

Burrowed mud habitat is found in marine areas where water movement is relatively limited, creating a stable environment for the seabed. This usually occurs in deeper water or in shallower sheltered areas, such as the sea lochs along Scotland's west coast (NS 2023). Burrowed mud habitat supports a range of marine invertebrates, many of which create burrows in the mud which aerate the substrate and prevent anoxic conditions from occurring. Burrowed mud is a Priority Marine Feature that is sensitive to physical disturbance, pollution and siltation. The nearest areas of burrowed mud habitat to the A87 Clachan Duich Bridge are located in Loch Duich, approximately 180m southwest from the area of works ([National Marine Plan Interactive](#); see Figure 5). There is a negligible risk of physical disturbance to burrowed mud as a result of investigations and surveys, which will require drilling of boreholes into the riverbed A87 Clachan Duich Bridge. There is also a risk that water quality could be affected due to pollution or siltation events during investigation, particularly drilling boreholes. Consequently, the proposed works could contribute to pressures faced by burrowed mud, which could in turn affect the conservation status of this feature within the SAC. **Therefore, LSE on burrowed mud as a result of the proposed works cannot be ruled out, and this feature is considered further in Stage 4.**

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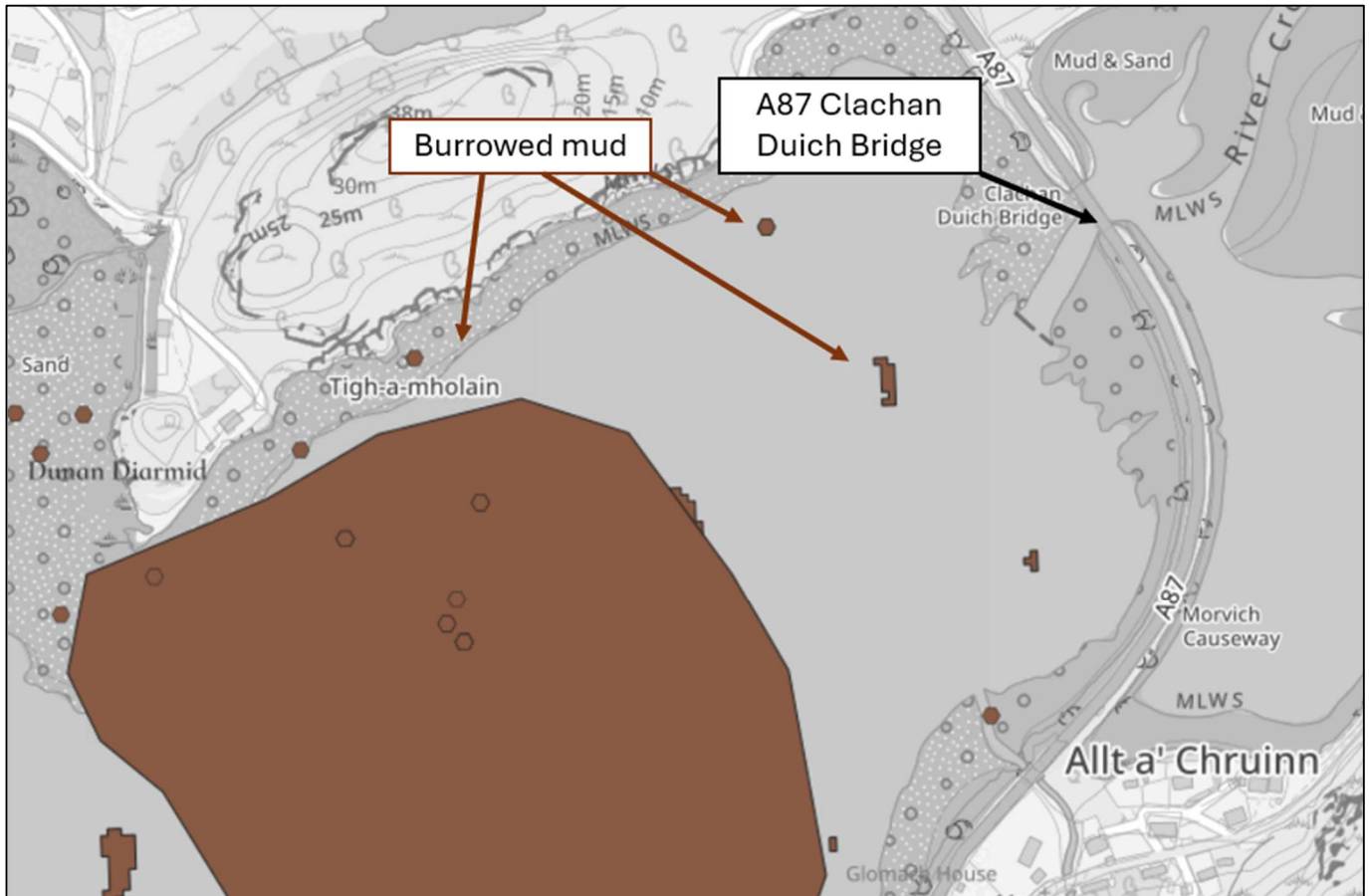


Figure 5. Location of nearest burrowed mud within 600m of the A87 Clachan Duich Bridge. Source: [National Marine Plan Interactive](#)

3. Inner Hebrides and the Minches SAC

The Inner Hebrides and the Minches SAC covers a very large area along the west coast of Scotland, including coastal waters extending from the Point of Store (north of Lochinver) south to the peninsula of Kintyre. The seas around Scotland's Inner Hebrides are included within the SAC boundary. The Inner Hebrides and the Minches SAC partially overlaps with Lochs Duich, Long, and Alsha MPA NC and Lochs Duich, Long and Alsh Reefs SAC, and forms part of Scotland's MPA network. It is designated for harbour porpoise which is a Priority Marine Feature. The SAC is located 12km northwest of the area of works.

Assessment against the conservation objectives for harbour porpoise

Harbour porpoise are wide-ranging cetaceans (and a European Protected Species) that inhabit the coastal waters along Scotland's west coast. They occur at low densities and are known to be sensitive to four main pressures that can affect harbour porpoise survival and distribution across the site (NS 2020). These pressures include:

- Removal of target and non-target species (i.e. entanglement of harbour porpoise in fishing gear and removal of their prey species).
- Contaminants (e.g. through effects on water quality and bioaccumulation of contaminants affecting survival and productivity of harbour porpoise).
- Underwater noise.
- Death or injury by collision (predominantly collision with fast-moving vessels and tidal turbines).

The proposed works at A87 Clachan Duich do not entail any fishing. However, some works would require the use of vessels which could result in collisions with harbour porpoise and the drilling of boreholes could result in underwater noise. Additionally, silt curtains will be implemented to contain sediment which could result in entanglement. All works

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have potential to result in pollution of the marine environment. Consequently, the proposed works could contribute to some of the above pressures, which could in turn affect the survival and distribution of harbour porpoise within the SAC. **Therefore, LSE on harbour porpoise as a result of the proposed works cannot be ruled out, and this feature is considered further in Stage 4.**

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Stage 4: Undertake an Appropriate Assessment of the Implications for the Site in View of its Conservation Objectives

Appropriate Assessment

It is the responsibility of the competent authority to carry out the appropriate assessment. The competent authority must consult SNH (NatureScot) on the appropriate assessment. NatureScot can provide advice on what issues should be considered in the appropriate assessment, what information is required to carry out the assessment, in some circumstances carry out an appraisal to inform an appropriate assessment and/or provide comments on an assessment carried out.

An 'appropriate assessment' consists of two parts: a scientific, reasoned appraisal (Stage 4) and a conclusion (Stage 5). Consider the proposed plan/project, its impact on the qualifying interests assessed against their conservation objectives and take account of any possible in combination effects with other plans or projects.

The following points should be considered:

- I. Describe for each qualifying interest the potential impacts of the proposal detailing which aspects or effects of the proposal could impact upon them and their conservation objectives.
- II. Evaluate the potential impacts, e.g., whether short/long term, reversible or irreversible, and in relation to the proportion/importance of the interest affected, and the overall effect on the site's conservation objectives. This should be in sufficient detail to ensure all impacts have been considered and sufficiently appraised. Record if additional survey information or specialist advice has been obtained.
- III. Each conservation objective should be considered, and a decision reached as to whether the proposal will affect achievement of this objective i.e., whether the conservation objective will be undermined if the proposal is consented to. Restore objectives may have been set where qualifying features of a site are in an unfavourable condition. In such cases the appropriate assessment should consider whether the plan or project would prevent the qualifying feature from being able to be restored.

The assessment in Stage 3 could not rule out LSE on the following qualifying features as a result of proposed works at A87 Clachan Duich Bridge. These features are considered further below:

- Lochs Duich, Long and Alsh Reefs SAC
 - Reefs
- Lochs Duich, Long and Alsh MPA NC
 - Flame shell beds
 - Burrowed mud
- Inner Hebrides and the Minches SAC
 - Harbour porpoise

1. Lochs Duich, Long and Alsh Reefs SAC

Reefs

As noted above, Lochs Duich, Long and Alsh Reefs SAC is designated for reefs, which can include rocky reefs and horse mussel beds. The A87 Clachan Duich Bridge is located 800m northeast of the SAC and the eastern end of the SAC covers part of Loch Duich. Some works will include in-water works/access (drilling boreholes and bathymetry survey), therefore there is a risk of direct impacts on reefs due to physical disturbance and/or sedimentation from in-water works, and a risk of indirect impacts on these features due to pollution, which can reduce water quality.

Risk of physical damage/sedimentation

The A87 Clachan Duich Bridge spans Loch Duich, but no works will take place within the SAC. Reefs are known to be present approximately 600m southwest of the bridge. Surveys/inspections requiring boat access will be of short duration (e.g., one week or less) and will use small boats which are unlikely to affect the seabed. As no reefs are present in the immediate vicinity of A87 Clachan Duich Bridge, anchor drops will not occur within areas of reefs and physical damage is not expected to occur as a result of boat use.

Works will not take place within or directly over the SAC but will take place within or over the same waterbody with direct hydrological connectivity to the SAC. The drilling of boreholes for investigations and integrity/sonic testing will require in-water works. The remaining works will take place on the bridge deck or by using below-deck access (e.g.

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scaffolding or under-bridge units). All works will be highly localised to the A87 Clachan Duich Bridge and its immediate vicinity and standard containment measures (e.g., edge protection, debris netting) will be in place around working areas. Although the distance between the working area and the nearest reefs likely ensures that any sediment produced during in-water works would be sufficiently diluted prior to reaching areas of reefs, additional mitigation measures will be in place to reduce this risk. Floating silt curtains will be installed in the water around the working area to contain any sediment or contaminated water produced during investigation works, particularly borehole drilling. Silt curtains should allow any disturbed sediment to settle within the contained area and prevent it from spreading through the marine environment and affecting reefs within the SAC. Chains are used to anchor the curtains to the seabed however this will not occur within areas of reefs and physical damage is not expected to occur as a result of the silt curtains. With these measures in place, the risk of physical damage or sedimentation to reefs is considered to be low.

Risk of pollution

There is potential for the proposed works to result in indirect effects on reefs as a result of pollution. However, the standard working practices noted in Stage 1 include robust containment measures to prevent pollution events for both in-water works/access and works undertaken from the bridge structure. The use of floating silt curtains around the working area will help contain any pollution or debris, which can then be collected and removed from site with appropriate authorisations where required. In addition, boats will be launched from local ports where possible to limit travel distances and reduce the effects of pollution.

Although the A87 Clachan Duich Bridge spans the Loch Duich waterbody, which provides hydrological connectivity to Lochs Duich, Long and Alsh Reefs SAC, none of the works involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Loch Duich waterbody. The proposed works will be highly localised and adhere to standard good practice for pollution prevention; therefore, with these measures in place during works, the risk of indirect effects on reefs and their associated species as a result of pollution is limited.

Cumulative and in-combination effects

The proposed works will be highly localised to the A87 Clachan Duich Bridge and immediate vicinity, and works are currently planned to take place in March 2026 (to be confirmed) over 10 days. A search has been undertaken for other plans and projects that could have cumulative or in-combination effects in the vicinity of the works, and none were identified. There is one planning application for construction of a holiday lodge approximately 450m from the bridge, which has not yet been approved and is unlikely to have a cumulative effect. In addition, considering the nature and scale of the works, there is likely to be limited potential for significant cumulative or in-combination effects due to other plans or projects.

The potential for cumulative or in-combination effects resulting from multiple activities carried out by BEAR is also limited due to the minor and localised scale the proposed investigation activities. No other works are currently planned at A87 Clachan Duich bridge during the proposed timing of the investigation works. BEAR Scotland are carrying out works at the A87 Carrich Bridge and A87 Skye Bridge, approximately 24km and 25km northeast of the scheme, respectively. The works at A87 Carrich Bridge are due to be completed by mid February 2026, so it is likely there will be no overlap in timing. The works at A87 Skye Bridge are due to begin in March 2026, so will likely overlap in timing with the works at A87 Clachan Duich. However, the scale of the investigation works at A87 Clachan Duich is relatively minor and the duration is only 10 days. The bridges are also a good distance apart (24km) so the likelihood for any cumulative or in-combination effects is likely to be limited. In addition, BEAR Scotland programme all proposed works in line with appropriate guidance and contractual requirements to take into account existing and future planned works on the trunk roads with a view to limiting any cumulative effects relating to traffic management. As a result of this approach, disturbance in localised areas due to investigations noise and activities is also limited.

Overall, due to the nature and scale of the proposed works, the distance between the area of works and designated site, it is highly unlikely that the proposed works would result in significant cumulative or in-combination effects on the qualifying feature of Lochs Duich, Long and Alsh Reefs SAC.

Conclusion

Upon detailed review, the in-water drilling and investigations by use of boats is likely to carry the highest risk of impacting reefs with the SAC; however, no reefs are present directly beneath A87 Clachan Duich Bridge and appropriate containment measures will be in place to reduce the risk of pollution and sedimentation. Therefore, **with the above measures in place, these works are not expected to result in adverse effects on site integrity (AESI) for Lochs Duich, Long and Alsh SAC. All conservation objectives for the qualifying feature will be met.**

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2. Lochs Duich, Long and Alsh MPA NC

Burrowed mud and flame shell beds

As noted above, Lochs Duich, Long and Alsh Reefs MPA NC is designated for reefs, which can include rocky reefs and horse mussel beds. The A87 Clachan Duich Bridge is located 50m west of the MPA NC and the eastern end of the SMPA NC covers part of Loch Duich. Some works will include in-water works/access (drilling boreholes and bathymetry survey), therefore there is a risk of direct impacts on burrowed mud and flame shell beds due to physical disturbance and/or sedimentation from in-water works, and a risk of indirect impacts on these features due to pollution, which can reduce water quality.

Risk of physical damage/sedimentation

The A87 Clachan Duich Bridge spans Loch Duich, but no works will take place within the MPA NC. Burrowed mud is known to be present approximately 180m southwest of the bridge, and flame shell beds are known to be present approximately 2.8km southwest of the bridge. Surveys/inspections requiring boat access will be of short duration (e.g., one week or less) and will use small boats which are unlikely to affect the seabed. As no burrowed mud habitat or flame shell beds are present in the immediate vicinity of A87 Clachan Duich Bridge, anchor drops will not occur within areas of burrowed mud or flame shell bed habitats and physical damage is not expected to occur as a result of boat use.

Works will not take place within or directly over the MPA NC but will take place within or over the same waterbody with direct hydrological connectivity to the MPA NC. The drilling of boreholes for investigations and integrity/sonic testing will require in-water works. The remaining works will take place on the bridge deck or by using below-deck access (e.g. scaffolding or underbridge unit). All works will be highly localised to the A87 Clachan Duich Bridge and its immediate vicinity and standard containment measures (e.g., edge protection, debris netting) will be in place around working areas. Although the distance between the working area and the nearest burrowed mud or flame shell beds likely ensures that any sediment produced during in-water works would be sufficiently diluted prior to reaching these areas, additional mitigation measures will be in place to reduce this risk. Floating silt curtains will be installed in the water around the working area to contain any sediment or contaminated water produced during investigation works, particularly borehole drilling. Silt curtains should allow any disturbed sediment to settle within the contained area and prevent it from spreading through the marine environment and affecting burrowed mud or flame shell beds within the MPA NC. Chains are used to anchor the curtains to the seabed however this will not occur within areas of burrowed mud and flame shell beds, and physical damage is not expected to occur as a result of the silt curtains. With these measures in place, the risk of physical damage or sedimentation to reefs is considered to be low.

Risk of pollution

There is potential for the proposed works to result in indirect effects on burrowed mud and flame shell beds as a result of pollution. However, the standard working practices noted in Stage 1 include robust containment measures to prevent pollution events for both in-water works or access and other works. The use of floating silt curtains around the working area will help contain any pollution or debris, which can then be collected and removed from site with appropriate authorisations where required. In addition, boats will be launched from local ports where possible to limit travel distances and reduce the effects of pollution.

Although the A87 Clachan Duich Bridge spans the Loch Duich waterbody, which provides hydrological connectivity to Lochs Duich, Long and Alsh MPA NC, none of the works involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Loch Duich waterbody. The proposed works will be highly localised and adhere to standard good practice for pollution prevention; therefore, with these measures in place during works, the risk of indirect effects on burrowed mud and flame shell beds and their associated species as a result of pollution is limited.

Cumulative and in-combination effects

The proposed works will be highly localised to the A87 Clachan Duich Bridge and immediate vicinity, and works are due to take place in March 2026 (to be confirmed) over 10 days. A search has been undertaken for other plans and projects that could have cumulative or in-combination effects in the vicinity of the works, and none were identified. There is one planning application for erection of a holiday lodge approximately 450m from the bridge, which has not yet been approved and is unlikely to have a cumulative effect. In addition, considering the nature and scale of the works, there is likely to be limited potential for significant cumulative or in-combination effects due to other plans or projects.

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The potential for cumulative or in-combination effects resulting from multiple activities carried out by BEAR is also limited due to the minor and localised scale the proposed investigation activities. No other works are currently planned at A87 Clachan Duich bridge during the proposed timing of the investigation works. BEAR Scotland are carrying out works at the A87 Carrich Bridge and A87 Skye Bridge, approximately 24km and 25km northeast of the scheme, respectively. The works at A87 Carrich Bridge are due to be completed by mid February 2026, so it is likely there will be no overlap in timing. The works at A87 Skye Bridge are due to begin in March 2026, so will likely overlap in timing with the works at A87 Clachan Duich. However, the scale of the investigation works at A87 Clachan Duich is relatively minor and the duration is only 10 days. The bridges are also a good distance apart (24km) so the likelihood for any cumulative or in-combination effects is likely to be limited. In addition, BEAR Scotland programme all proposed works in line with appropriate guidance and contractual requirements to take into account existing and future planned works on the trunk roads with a view to limiting any cumulative effects relating to traffic management. As a result of this approach, disturbance in localised areas due to investigations noise and activities is also limited.

Overall, due to the nature and scale of the proposed works, the distance between the area of works and designated site, it is highly unlikely that the proposed works would result in significant cumulative or in-combination effects on the qualifying features of Lochs Duich, Long and Alsh MPA NC.

Conclusion

Upon detailed review, the in-water drilling and investigations by use of boats is likely to carry the highest risk of impacting burrowed mud and flame shell beds with the MPA NC; however, no burrowed mud or flame shell beds are present directly beneath A87 Clachan Duich Bridge and appropriate containment measures will be in place to reduce the risk of pollution and sedimentation. Therefore, with the above measures in place, **these works are not expected to result in AESI for Lochs Duich, Long and Alsh MPA NC. All conservation objectives for the qualifying features will be met.**

3. Inner Hebrides and the Minches SAC

Harbour porpoise

As noted above, the Inner Hebrides and the Minches SAC is designated for harbour porpoise and is located 12km northwest of the A87 Clachan Duich Bridge. Although the proposed works will not include fishing or the use of nets, the silt curtains used to contain sediment could entangle harbour porpoise. Additionally, some investigation works will require the use of vessels which may result in underwater noise and disturbance to harbour porpoise. All works have potential to result in pollution of the marine environment. Therefore, there is a risk of direct impacts on harbour porpoise due to collision with investigation vessels and entanglement in silt curtains, and a risk of indirect impacts on harbour porpoise due to disturbance (e.g. underwater noise, loss of foraging habitat, and pollution).

Risk of collision or entanglement

The A87 Clachan Duich Bridge is located 12km from the SAC, and no works will take place within the SAC. The bridge is located at the very eastern end of Loch Duich and it is not likely that harbour porpoise will frequently travel this far into the loch. A review of the NBN Atlas did not return any records of harbour porpoise within 2km of the bridge in the last 10 years. Due to the distance of the works to the SAC, and the low likelihood of harbour porpoise being present in the immediate vicinity of the works, the potential for direct effects on harbour porpoise as a result of investigation activities is low. In-water works/access will be required for the integrity and sonic testing which require the use of boats for access. However, works requiring in-water access will be highly localised to the A87 Clachan Duich immediate vicinity, are of a short duration (10 days) and will use small boats. Any boats or vessels would launch from local points where possible to limit travel distances. Where the use of boats is required to carry out the works, all vessels operating during works will adhere to good practice for watching marine wildlife to maintain appropriate speed and distance to reduce the risk of accidental collision (NS 2017). Most of the proposed works would take place on the bridge or by using a temporary scaffold platform or proprietary access system erected on the bridge deck with cantilevers. With these measures in place, and as harbour porpoise are not likely to be present in the immediate vicinity of the bridge, and are highly mobile, it is expected that they would easily be able to avoid any vessels used for works. Therefore, upon detailed review, the risk of construction vessels colliding with harbour porpoise within the SAC is considered to be negligible.

Floating silt curtains will be installed in the water around the working area to contain any sediment or contaminated water produced during investigation works, particularly during borehole drilling. Silt curtains should allow any disturbed sediment to settle within the contained area and prevent it from spreading through the marine environment

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and affecting sensitive marine habitats; however, it could result in the entanglement of harbour porpoise. The silt curtains will be highly localised to the A87 Clachan Duich Bridge immediate vicinity and will only be installed during the works which are of a short duration (10 days). They will be installed around the working area for borehole drilling which is located at the bridge piers. Additionally, the silt curtains will act as a solid barrier due to its impermeable material which would make them more detectable to harbour porpoises. Harbour porpoise are sensitive to noise and have been observed to avoid areas of construction during periods of noisy activities (e.g. pile driving) at least up to a distance of 15km (Marine Scotland 2020). Due to the distance between the SAC and the area of works (12km), it is not likely that harbour porpoise will be present in the immediate vicinity of the works. Therefore, upon detailed review, the risk of entanglement of harbour porpoise in the silt curtains is considered to be low.

Risk of disturbance

The A87 Clachan Duich Bridge is located 12km from the SAC, and no works will take place within the SAC. The bridge is located at the very eastern end of Loch Duich and it is not likely that harbour porpoise will frequently travel this far into the loch. A review of the NBN Atlas did not return any records of harbour porpoise within 2km of the bridge in the last 10 years. Due to the distance of the works to the SAC, and the low likelihood of harbour porpoise being present in the immediate vicinity of the works, the potential for direct effects on harbour porpoise as a result of investigation activities is low. However, the use of boats and drilling of boreholes could result in underwater noise that could disturb harbour porpoise.

Harbour porpoise are found in coastal seas where boat traffic levels and noise levels tend to be high. The A87 Clachan Duich Bridge is located approximately 22km southeast from the busy port at Kyle of Lochalsh. Results of a study by Danuta et al (2018) suggested that wild harbour porpoises can be disturbed by noise from boats and ships even when they inhabit areas of high boat traffic (e.g. near harbours). Porpoises in the study were recorded diving deep and/or suspending foraging activities to avoid high-level noise from close ship passes. Although there is a high level of existing marine traffic at the port at Kyle of Lochalsh, additional use of boats for works could result in disturbance of harbour porpoise and potential displacement from foraging areas. Several studies carried out to examine the effect of simulated increases in boat traffic and/or dredging activities on bottlenose dolphins (*Tursiops truncatus*) in the Moray Firth suggested that localised increases in disturbance due to increased boat traffic and/or dredging activities do not affect the overall viability of the dolphin population or survival rates of calves over the longer term (New et al. 2013, Pirodda et al. 2015). This was mainly due to the high mobility of the dolphins which allows them to avoid areas of higher disturbance. Although this research focused on bottlenose dolphin, harbour porpoise are classed as very high-frequency cetaceans alongside bottlenose dolphins and have a similar sensitivity to underwater noise as well as high mobility and are likely to behave similarly to bottlenose dolphins (Southall et al. 2019). Considering this alongside the low frequency and duration of boat use required for the proposed works (10 days), boats would launch from local points where possible to limit travel distances, and engine noise will likely only be produced when traveling to/from the bridge and when moving between piers, the risk of significant disturbance to harbour porpoise from underwater noise as a result of proposed works is considered to be low.

The drilling works will be highly localised to the A87 Clachan Duich immediate vicinity and the works are of a short duration (10 days). Noise levels created by drilling will be relatively low (less than 10Hz to 10kHz) and will not entail loud or impulsive activities such as pile driving, dredging or blasting. The drilling methodology will be carried out in short, infrequent durations which are not impulsive and can be detrimental to hearing in porpoises (Southall et al. 2019). With these measures in place, and as harbour porpoise are highly mobile, it is expected that they would easily be able to avoid the area of works. Therefore, upon detailed review, the risk of significant disturbance to harbour porpoise as a result of the proposed works is considered to be low.

It is unknown whether the area around the A87 Clachan Duich Bridge provides suitable foraging habitat for harbour porpoise; however, even if it is used frequently by harbour porpoise, the low amount of boat traffic required for works, and the relatively low and infrequent underwater noise created by drilling, is not expected to significantly reduce the foraging area of local harbour porpoise. Furthermore, the works will be carried out during the daytime hours. Most of the porpoises tracked by Danuta et al. (2018) foraged primarily at night. This suggests that any loss of foraging habitat during works would be temporary each day, and this area would become available again during periods when works are paused (at night). In addition, harbour porpoise are not likely to be present in the immediate vicinity of the bridge, are highly mobile, thus would have ample alternative habitat available to them in the wider area, and within the SAC which is 12km from the area of works.

Upon detailed review, the works are considered to carry limited potential to result in significant underwater noise or impacts on foraging habitat for harbour porpoise. In addition, considering that harbour porpoise are highly mobile and

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capable of moving to undisturbed areas of the SAC, and are not likely to be present in the immediate vicinity of the works, the risk of significant disturbance on harbour porpoise as a result of the proposed works is considered to be low.

Risk of pollution

The A87 Clachan Duich Bridge is located 12km from the SAC, and no works will take place within the SAC. The bridge is located at the very eastern end of Loch Duich and it is not likely that harbour porpoise will travel frequently this far into the loch. A review of the NBN Atlas did not return any records of harbour porpoise within 2km of the bridge in the last 10 years. Due to the distance of the works to the SAC, and the low likelihood of harbour porpoise being present in the immediate vicinity of the works, the potential for indirect effects on harbour porpoise, their supporting habitats, and prey species as a result of pollution from investigation activities is low. The standard working practices noted in Stage 1 and Appendix A include robust containment measures to prevent pollution events for both in-water works and other works undertaken from the bridge deck. In addition, boats will be launched from local ports where possible to limit travel distances and reduce the effects of pollution.

Additionally, none of the works involve activities that would result in changes to the water levels, tides or other hydrological processes in the Loch Duich waterbody. The proposed works will be highly localised and adhere to standard good practice for pollution prevention; therefore, no significant effects on fish within the SAC (i.e. prey for harbour porpoise) have been identified.

With these measures in place during works, and due to the distance of the works from the SAC, the risk of indirect effects on harbour porpoise and their supporting habitats and prey species as a result of pollution is limited.

Cumulative and in-combination effects

The proposed works will be highly localised to the A87 Clachan Duich Bridge and immediate vicinity, and works are due to take place in March 2026 (to be confirmed) over 10 days. A search has been undertaken for other plans and projects that could have cumulative or in-combination effects in the vicinity of the works, and none were identified. There is one planning application for erection of a holiday lodge approximately 450m from the bridge, which has not yet been approved and is unlikely to have a cumulative effect. In addition, considering the nature and scale of the works, there is likely to be limited potential for significant cumulative or in-combination effects due to other plans or projects.

The potential for cumulative or in-combination effects resulting from multiple activities carried out by BEAR is also limited due to the minor and localised scale the proposed investigation activities. No other works are currently planned at A87 Clachan Duich bridge during the proposed timing of the investigation works. BEAR Scotland are carrying out works at the A87 Skye Bridge, approximately 25km northeast of the scheme. The works at A87 Skye Bridge are due to begin in Financial Year 2026/27, so there may be an overlap in timing with the works at A87 Clachan Duich. However, the scale of the investigation works at A87 Clachan Duich is relatively minor, highly localised to the bridge and the duration is only 10 days. The bridges are also a good distance apart (25km) so the likelihood for any cumulative or in-combination effects is likely to be limited. In addition, BEAR Scotland programme all proposed works in line with appropriate guidance and contractual requirements to take into account existing and future planned works on the trunk roads with a view to limiting any cumulative effects relating to traffic management. As a result of this approach, disturbance in localised areas due to investigations noise and activities is also limited.

Overall, due to the nature and scale of the proposed works, the distance between the area of works and designated site, it is highly unlikely that the proposed works would result in significant cumulative or in-combination effects on the qualifying features of Inner Hebrides and the Minches SAC.

Conclusion

Upon detailed review, the in-water drilling and investigations by use of boats have limited potential to result in LSE on harbour porpoise within the SAC. A few activities carry a higher risk of impacting harbour porpoise due to collisions with vessels, entanglement or disturbance, and all activities have potential to result in pollution. However, with the above measures in place alongside robust containment measures, these works are not expected to result in AESI for Inner Hebrides and the Minches SAC, and all conservation objectives for harbour porpoise within the SAC will be met.

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Stage 5: Can it be Ascertained that the Proposal Will Not Adversely Affect the Integrity of the Site?

Assessment for AESI

In the light of the appraisal, ascertain whether the proposal will not adversely affect the integrity of the site. Conclusions should be reached beyond reasonable scientific doubt. If more than one SAC and/or SPA is involved, give separate conclusions. If mitigation or modifications are required, detail these below.

LSE could not be ruled out for the following qualifying features:

1. Lochs Duich, Long and Alsh Reefs SAC

- Reefs

2. Lochs Duich, Long and Alsh MPA NC

- Burrowed mud
- Flame shell beds

3. Inner Hebrides and the Minches SAC

- Harbour porpoise

However, with the measures outlined in Stage 4 in place, alongside the proper application of the standard working practices and measures described in Stage 1 and Appendix A, **it is concluded that the works will not result in AESI for the above designated sites, either alone or in combination with other plans or projects.**

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Modifications Required to Ensure Adverse Effects are Avoided and Reasons for These

Required Modifications
Only list those modifications (i.e., further mitigation) that have been identified as being required to prevent there being an adverse effect on site integrity.
Do not include mitigation that has already been planned in the plan/project or best practice that is already being followed unless you believe these should be added as conditions to the permission given.

Following detailed review, the below measures to reduce the effects of pollution from works are considered suitable to ensure that the works do not result in AESI on Lochs Duich, Long and Alsh Reefs SAC, Lochs Duich, Long and Alsh Reefs MPA NC, and Inner Hebrides and the Minches SAC:

- Boats will be launched from local ports where possible to limit travel distances.
- Boats or vessels used for works should avoid the use of anchors where possible and must avoid areas where reefs, flame shell beds, and/or burrowed mud habitat is known to be present within the SAC and MPA NC boundaries.
- Floating silt curtains will be installed in the water around the working area to contain any sediment or contaminated water produced during works.

Advice Sought

Consultation
Include here details of, or clear reference to, any advice sought. If an appropriate assessment has been carried out NatureScot must be consulted.

Due to the proximity of A87 Clachan Duich Bridge to designated sites, advice on potential impacts of works will be sought from NatureScot and the Marine Directorate to inform this assessment.

Conclusion in Relation to Plan or Project

Conclusion
In view of the appraisal above select the appropriate response position and whether the plan or project can be consented/approved/undertaken. Note: this conclusion is just in relation to effects on a European site. There may be impacts to other natural heritage interests that also need to be considered.

This HRA has been undertaken to assess the potential impacts of the investigation works at A87 Clachan Duich Bridge (described in Stage 1 and Appendix A) on the qualifying features of the below European Sites, and has **concluded that although LSE on the qualifying features of Lochs Duich, Long and Alsh Reefs SAC, Lochs Duich, Long and Alsh MPA NC, and Inner Hebrides and the Minches SAC could not be ruled out, the proposed works will not result in AESI on these features provided the above mitigation measures are in place.**

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Appendix A – Standard Good Practice Measures

Standard working practices for works in or near water

Works will be undertaken within the marine environment and as such are generally not subject to authorisation under the Environmental Authorisations (Scotland) Regulations 2018 (EASR). However, BEAR Scotland follow good practice guidance (including but not limited to the below list) as standard for works in or near water to reduce the risk of water pollution as much as possible:

- Engineering in the Water Environment Good Practice Guide. Temporary Construction Methods WAT-SG-29 (SEPA, 2009).
- Engineering in the Water Environment Good Practice Guide. River Crossings WAT-SG-25 (SEPA, 2010).
- SEPA Guidance for Pollution Prevention (GPP) 1: Understanding your environmental responsibilities – good environmental practices (NetRegs, 2021).
- SEPA GPP 5: Works and maintenance in or near water (NetRegs, 2018).
- SEPA GPP 21: Pollution incident response planning (NetRegs 2021).
- SEPA General Binding Rule (GBR) 6: Construction and maintenance of a minor bridge over a river, burn or ditch; (or removal) of a temporary bridge over a river, burn or ditch that has a bed width of less than 5m; or of a surface water drainage system outfall which discharges into a river, burn or ditch (SEPA, 2024).
- SEPA GBR9: Operating any vehicle, plant or other equipment (machinery) in or near any surface water or wetland for the purpose of undertaking any other GBR activity or for the purpose of maintaining an existing man-made structure in or near any surface water or wetland (SEPA, 2024).

Specific working practices outlined in the aforementioned guidance that must be adhered to include, but are not limited to:

- All reasonable steps must be taken to prevent silt from entering the waterbody (GPP 5).
- Plant and wheel washing to be carried out in a designated area of hardstanding at least 10m away from any waterbody or surface water drain. Where possible, washing will take place prior to moving vehicles/equipment to different water bodies to reduce the risk of transporting invasive aquatic plants or other species (GPP 5 and GBR 9).
- Refuelling must take place at least 10m away from any surface water. Appropriate containment measures (e.g., drip trays, funnels, plant nappies, bunding) must be in place to reduce the risk of spills (GPP 5, GBR 9).
- Biodegradable hydraulic oils should be used for vehicles and plant where possible (GPP 5).
- Dust, debris and contaminated water will be appropriately contained to reduce the risk of pollution (GPP 5).
- Development of a pollution incidence response plan is required (GPP 21).
- The works must not prevent the free passage of migratory fish (GBR 7).
- All reasonable steps must be taken to ensure that the discharge does not result in pollution of the water environment (GBR 10(a)).

Additional standard working practices

In addition to the standard working practices and measures described above, the following good practice and management measures will be adopted by the successful contractor for each of the above activities:

- Where required (e.g., to comply with protected species legislation), relevant ecological surveys will be carried out prior to works. If surveys identify the requirement for protected species licencing, additional consultation with NatureScot will be carried out and licences will be sought where required.
- The site supervisor will give appropriate toolbox talks prior to work commencing. These talks will highlight any sensitive features, including the designated sites and their qualifying features.
- The contractor will be required to produce a contingency plan for dealing with spills or environmental incidents on site. Spill kits must be present on site, quickly accessible, and all staff trained in their use.
- All spills must be logged and reported. In the event of any spills into the water environment, all works must stop and the incident be reported to the project manager and the BEAR Scotland Environmental Team. SEPA (and where required, the Marine Directorate) must be informed of any such incident as soon as possible, and within 24 hours at the latest. The local DSFB must also be informed of any incidents as soon as possible.

A87 Clachan Duich Refurbishment

Document:	Form 565 Habitats Regulations Appraisal Proforma
Issue:	#1
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- Any waste generated will be removed from site and either recycled or disposed of in compliance with Waste Management Regulations.
- Where the use of boats or in-water access is required, equipment or vehicles will be appropriately cleaned prior to moving between water bodies and site staff will utilise a [Check Clean Dry](#) methodology following guidance from NatureScot (Cook et al. 2014) and the Great Britain Non-Native Species Secretariat.

The above measures will ensure that any potential pollutants, including fine sediments and materials required for works in or near water, will not enter the water environment during works. In addition, these measures will reduce the risk of transporting invasive aquatic species such as Himalayan balsam (*Impatiens glandulifera*) which may be found on the shoreline, and carpet sea squirt (*Didemnum vexillum*) within the marine environment. All relevant pollution controls and other good practice measures will be detailed in the SEMP for each scheme and adhered to on site.