

**A9 Kessock Bridge
10-Year Marine Licence Programme of
Works**

**F565 Habitats Regulations Appraisal
Proforma**

November 2025



experience that delivers



A9 Kessock Bridge 10-Year Marine Licence HRA Proforma	
Document:	Form 565 Habitats Regulations Appraisal Proforma
Issue:	#1
Related to:	All Contracts



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 5km of A9 Kessock Bridge and may be affected by works:

1. **Moray Firth Special Area of Conservation (SAC)**
2. **Moray Firth Special Protection Area (SPA)**
3. **Inner Moray Firth SPA**
4. **Inner Moray Firth Ramsar**

The following European sites are located between 5-20km from A9 Kessock Bridge and may have connectivity with the area of works:

5. **Cromarty Firth SPA**
6. **Cromarty Firth Ramsar**

The following European sites are located approximately 40-60km (via connected waterbodies) from A9 Kessock Bridge and may have connectivity with the area of works:

7. **River Moriston SAC**
8. **Dornoch Firth and Morrish More SAC**

In addition, the following European sites were identified within 20km of A9 Kessock Bridge but were scoped out of further assessment as no pathway to effect was identified due to the nature of the qualifying features and distance from the area of works:

- Monadh Mor SAC
- Dam Wood SAC
- Moniack Gorge SAC
- Loch Ashie SPA
- Conon Islands SAC
- Carn nan Tri-Tghearnan SAC
- Loch Flemington SPA
- Cawdor Wood SAC
- Loch Ussie SAC
- Loch Ruthven SPA
- Loch Ruthven SAC
- Loch Ruthven Ramsar

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Name of Component SSSI, if Relevant

The following component Sites of Special Scientific Interest (SSSI) are located within 5km of A9 Kessock Bridge, overlap some of the above European Sites, and may be affected by works. Details of qualifying features and conservation status were accessed on 24-25/07/2025 from NatureScot (NS) SiteLink ([Sitelink](#)).

1. Longman and Castle Stuart Bays SSSI ([Site Code 1675](#)) is designated for the following qualifying features:

- Cormorant (*Phalacrocorax carbo*), non-breeding – Unfavourable no change, last assessed in March 2005
- Goldeneye (*Bucephala clangula*), non-breeding – Favourable maintained, last assessed March 2005
- Red-breasted merganser (*Mergus serrator*), non-breeding – Unfavourable declining, last assessed in March 2005
- Redshank (*Tringa totanus*), non-breeding – favourable maintained, last assessed in March 2005
- Wigeon (*Anas penelope*) – favourable maintained, last assessed in March 2005
- Eelgrass beds – favourable maintained, last assessed in June 2010
- Mudflats – favourable maintained, last assessed in November 2011
- Saltmarsh – favourable maintained, last assessed in October 2011

2. Beaully Firth SSSI ([Site Code 159](#)) is designated for the following qualifying features:

- Goosander (*Mergus merganser*), non-breeding – unfavourable no change, last assessed in March 2005
- Greylag goose (*Anser anser*), non-breeding – favourable maintained, last assessed in March 2005
- Red-breasted merganser, non-breeding – unfavourable no change, last assessed in March 2005
- Saltmarsh – favourable maintained, last assessed in February 2012
- Vascular plant assemblage – favourable maintained, last assessed in July 2010

3. Munloch Bay SSSI ([Site Code 1214](#)) is designated for the following qualifying features:

- Greylag goose, non-breeding – favourable maintained, last assessed in March 2005
- Wigeon (*Anas penelope*), non-breeding – favourable maintained, last assessed in June 2010
- Mudflats – favourable maintained, last assessed in June 2010
- Saltmarsh – favourable maintained, last assessed in October 2011

4. Cromarty Firth SSSI ([Site Code 467](#)) is designated for the following qualifying features:

- Bar-tailed godwit (*Limosa lapponica*), non-breeding – favourable maintained, last assessed in November 2010
- Red-breasted merganser, non-breeding – favourable maintained, last assessed in March 2005
- Redshank, non-breeding – favourable maintained, last assessed in November 2010
- Whooper swan (*Cygnus cygnus*) – unfavourable no change, last assessed in March 2005
- Wigeon, non-breeding – favourable maintained, last assessed in November 2010
- Mudflats – favourable maintained, last assessed in June 2010
- Saltmarsh – favourable declining, last assessed in March 2024
- Sandflats – favourable maintained, last assessed in June 2010

In addition, the following SSSIs were identified within 20km of A9 Kessock Bridge but were scoped out of further assessment as no pathway to effect was identified due to the nature of the qualifying features and distance from the area of works.

- Torvean Landforms SSSI
- Roskill SSSI
- Monadh Mor SSSI
- Dam Wood SSSI
- Dalroy and Clava Landforms SSSI

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- Littlemill Fluvio-glacial Landforms SSSI
- Moniack Gorge SSSI
- Kildrummie Kames SSSI
- Loch Ashie SSSI
- The Dens SSSI
- Drummondreach SSSI
- Rosemarkie to Shandwick Coast SSSI
- Lower River Conon SSSI
- Ardersier Glacial Deposits SSSI
- Carn nan Tri-tighearnan SSSI
- Whiteness Head SSSI
- Loch Batten SSSI
- Braelangwell Wood SSSI
- Cawdor Wood SSSI
- Loch Ussie SSSI
- Loch Ruthven SSSI
- Creag nan Clag SSSI

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 accessed on 24-25/07/2025 from NS SiteLink. Priority qualifying features are denoted below by (*).

1. Moray Firth SAC ([Site code 8327](#)):

- Bottlenose dolphin (*Tursiops truncatus*) – favourable maintained, last assessed in August 2024
- Subtidal sandbanks – favourable maintained, last assessed in March 2005

2. Moray Firth SPA

- Common scoter (*Melanitta nigra*), non-breeding – favourable maintained, last assessed in March 2023
- Eider (*Somateria mollissima*), non-breeding – favourable declining, last assessed in March 2023
- Goldeneye, non-breeding – unfavourable declining, last assessed in March 2023
- Great northern diver (*Gavia immer*), non-breeding – favourable maintained, last assessed in March 2023
- Long-tailed duck (*Clangula hyemalis*), non-breeding – favourable declining, last assessed in April 2023
- Red-breasted merganser, non-breeding – favourable maintained, last assessed in March 2023
- Red-throated diver (*Gavia stellata*), non-breeding – favourable maintained, last assessed in March 2023
- Scaup (*Aythya marila*), non-breeding – unfavourable declining, last assessed in March 2023
- Shag (*Phalacrocorax aristotelis*), breeding – favourable maintained, last assessed in July 2022
- Shag, non-breeding – favourable maintained, last assessed in July 2022
- Slavonian grebe (*Podiceps auritus*), non-breeding – favourable maintained, last assessed in March 2023
- Velvet scoter (*Melanitta fusca*), non-breeding – unfavourable declining, last assessed in March 2023

3. Inner Moray Firth SPA ([Site code 8515](#)):

- Bar-tailed godwit, non-breeding – favourable maintained, last assessed in March 2005
- Common tern, breeding – unfavourable no change, last assessed in March 2005
- Cormorant, non-breeding – unfavourable no change, last assessed in March 2005
- Curlew, non-breeding – favourable maintained, last assessed in March 2005
- Goldeneye (*Bucephala clangula*), non-breeding – favourable maintained, last assessed in March 2005
- Goosander (*Mergus merganser*), non-breeding – unfavourable no change, last assessed in March 2005
- Greylag goose, non-breeding – favourable maintained, last assessed in March 2005
- Osprey, breeding – favourable maintained, last assessed in March 2005

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- Oystercatcher, non-breeding – favourable maintained, last assessed in March 2005
- Red-breasted merganser, non-breeding – unfavourable no change, last assessed in March 2005
- Redshank, non-breeding – favourable maintained, last assessed in March 2005
- Scaup (*Aythya marila*), non-breeding – favourable maintained, last assessed in March 2005
- Teal (*Anas crecca*), non-breeding – favourable maintained, last assessed in March 2005
- Wigeon, non-breeding – favourable maintained, last assessed in March 2005
- Waterfowl assemblage, non-breeding – favourable maintained, last assessed in March 2005.

4. Inner Moray Firth Ramsar ([Site code 8430](#)):

- Bar-tailed godwit, non-breeding – favourable maintained, last assessed in March 2005
- Greylag goose, nonbreeding – favourable maintained, last assessed in March 2005
- Red-breasted merganser, non-breeding – unfavourable no change, last assessed in March 2005
- Redshank, non-breeding – favourable maintained, last assessed in March 2005
- Waterfowl assemblage, non-breeding – favourable maintained, last assessed in March 2005
- Intertidal mudflats and sandflats – favourable maintained, last assessed in November 2011
- Saltmarsh – favourable maintained, last assessed in February 2012
- Sand dunes – unfavourable no change, last assessed in December 2020
- Shingle – favourable declining, last assessed in December 2020
- Additional interest features included on the Ramsar citation sheet and for which the SPA conservation status has been used:
 - Common tern, breeding – unfavourable no change, last assessed in March 2005
 - Cormorant, non-breeding – unfavourable no change, last assessed in March 2005
 - Curlew, non-breeding – favourable maintained, last assessed in March 2005
 - Goldeneye, non-breeding – favourable maintained, last assessed in March 2005
 - Goosander, non-breeding – unfavourable no change, last assessed in March 2005
 - Osprey, foraging/breeding – favourable maintained, last assessed in March 2005
 - Oystercatcher (*Haematopus ostralegus*), non-breeding – favourable maintained, last assessed in March 2005
 - Scaup, non-breeding – favourable maintained, last assessed in March 2023
 - Teal, non-breeding – favourable maintained, last assessed in March 2005
 - Wigeon, non-breeding – favourable maintained, last assessed in March 2005

5. Cromarty Firth SPA ([Site code 8488](#)):

- Bar-tailed godwit, non-breeding – favourable maintained, last assessed in March 2005
- Common tern (*Sterna hirundo*), breeding – unfavourable declining, last assessed in March 2005
- Curlew (*Numenius arquata*), non-breeding – favourable maintained, last assessed in December 2010
- Dunlin (*Calidris alpina alpina*), non-breeding – favourable maintained, last assessed in March 2005
- Greylag goose, non-breeding – favourable maintained, last assessed in March 2005
- Knot, non-breeding – favourable maintained, last assessed in March 2005
- Osprey (*Pandion haliaetus*), breeding – favourable maintained, last assessed March 2005
- Oystercatcher, non-breeding, favourable maintained, last assessed in March 2005
- Pintail (*Anas acuta*), non-breeding – favourable maintained, last assessed in March 2005
- Red-breasted merganser, non-breeding – favourable maintained, last assessed in March 2005
- Redshank, non-breeding – favourable maintained, last assessed in December 2010
- Scaup, non-breeding – unfavourable no change, last assessed in March 2005
- Whooper swan, non-breeding – unfavourable no change, last assessed in June 2011
- Wigeon, non-breeding – favourable maintained, last assessed in March 2005
- Waterfowl assemblage, non-breeding – favourable maintained, last assessed in March 2005

6. Cromarty Firth Ramsar ([Site code 8418](#)):

- Bar-tailed godwit, non-breeding – favourable maintained, last assessed in March 2005
- Greylag goose, non-breeding – favourable maintained, last assessed in March 2005
- Waterfowl assemblage, non-breeding – favourable maintained, last assessed in March 2005
- Intertidal mudflats and sandflats – favourable maintained, last assessed in July 2010

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- Additional interest features included on the Ramsar citation sheet and for which the SPA or SSSI (Cromarty Firth or Lower River Conon) conservation status has been used:
 - Common tern, breeding – unfavourable declining, last assessed in March 2005
 - Curlew, non-breeding – favourable maintained, last assessed in December 2010
 - Dunlin, non-breeding – favourable maintained, last assessed in March 2005
 - Knot, non-breeding – favourable maintained, last assessed in March 2005
 - Osprey, breeding – favourable maintained, last assessed in March 2005
 - Oystercatcher, non-breeding – favourable maintained, last assessed in March 2005
 - Pintail, non-breeding – favourable maintained, last assessed in March 2005
 - Red-breasted merganser, non-breeding – favourable maintained, last assessed in March 2005
 - Redshank, non-breeding – favourable maintained, last assessed in December 2010
 - Scaup, non-breeding – unfavourable no change, last assessed in March 2005
 - Whooper swan, non-breeding – unfavourable no change, last assessed in March 2005
 - Wigeon, non-breeding – favourable maintained, last assessed in March 2005
 - Estuarine alder woodland – unfavourable no change, last assessed in June 2010
 - Open water transition fen – favourable maintained, last assessed in March 2011
 - Saltmarsh – favourable recovering, last assessed in March 2024

7. River Moriston SAC ([Site Code 8361](#)):

- Atlantic salmon (*Salmo salar*) – unfavourable no change, last assessed in March 2015
- Freshwater pearl mussel (FWPM) (*Margaritifera margaritifera*) – unfavourable no change, last assessed in March 2019

8. Dornoch Firth and Morrich More SAC ([Site Code 8242](#)):

- Atlantic salt meadows – favourable maintained, last assessed in December 2014
- Coastal dune heathland* – unfavourable no change, last assessed in March 2005
- Dune grassland* – unfavourable no change, last assessed in March 2005
- Dunes with juniper thickets* – unfavourable recovering, last assessed in June 2014
- Estuaries – condition not assessed
- Glasswort and other annuals colonising mud and sand – favourable maintained, last assessed in May 2012
- Harbour seal (*Phoca vitulina*) – unfavourable declining, last assessed in March 2024
- Humid dune slacks – favourable maintained, last assessed in March 2005
- Intertidal mudflats and sandflats – favourable maintained, last assessed in March 2005
- Lime-deficient dune heathland with crowberry* – unfavourable no change, last assessed in December 2020
- Otter (*Lutra lutra*) – favourable maintained, last assessed in December 2015
- Reefs – unfavourable declining, last assessed in November 2021
- Shifting dunes – favourable maintained, last assessed in May 2012
- Shifting dunes with marram – favourable maintained, last assessed in May 2012
- Subtidal sandbanks – favourable maintained, last assessed in March 2005

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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 site, accessed from SiteLink on 25/07/2025:

1. Moray Firth SAC:

1. To ensure that the qualifying features of Moray Firth SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status.
2. To ensure that the integrity of Moray Firth SAC is maintained or restored in the context of environmental changes by meeting objectives 2a, 2b, and 2c for each qualifying feature:

For subtidal sandbanks:

- a) Maintain/restore the extent and distribution of the habitat within the site.
- b) Maintain/restore the structure and function of the habitat and the supporting environment on which it relies.
- c) Maintain/restore the distribution and viability of typical species of the habitat.

For bottlenose dolphin:

- a) The population of bottlenose dolphin is a viable component of the site.
- b) The distribution of bottlenose dolphin throughout the site is maintained by avoiding significant disturbance.
- c) The supporting habitats and processes relevant to bottlenose dolphin and the availability of prey for bottlenose dolphin are maintained.

2. Moray Firth SPA:

1. To ensure that the qualifying features of Moray Firth SPA are in favourable condition and make an appropriate contribution to achieving favourable conservation status.
2. To ensure that the integrity of Moray Firth SPA is restored in the context of environmental changes by meeting objectives 2a, 2b, and 2c for each qualifying feature.
 - a) The populations of qualifying features are viable components of the site.
 - b) The distribution of the qualifying features is maintained throughout the site by avoiding significant disturbance of the species.
 - c) The supporting habitats and processes relevant to qualifying features and their prey resources are maintained, or where appropriate restored, at the Moray Firth SPA.

3. Inner Moray Firth SPA:

1. To avoid deterioration of the habitats of the qualifying species (listed above) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained; and
2. To ensure for the qualifying species that the following are maintained in the long term:
 - Population of the species as a viable component of the site
 - Distribution of the species within site
 - Distribution and extent of habitats supporting the species
 - Structure, function, and supporting processes of habitats supporting the species
 - No significant disturbance of the species

4. Inner Moray Firth Ramsar:

- *For the qualifying habitats:*
 - To avoid deterioration of the qualifying habitats, thus ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and
 - To ensure for the qualifying habitats that the following are maintained in the long term:
 - Extent and distribution of the habitat on site
 - Structure and function and supporting process of the habitat

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- Distribution and viability of typical species of the habitat

- *For the qualifying bird species:*
 - Refer to the conservation objectives for Inner Moray Firth SPA (listed above).

5. Cromarty Firth SPA:

1. To avoid deterioration of the habitats of the qualifying species (listed above) or significant disturbance to the qualifying species, thus ensuring that the integrity of the site is maintained; and
2. To ensure for the qualifying species that the following are maintained in the long term:
 - Population of the species as a viable component of the site
 - Distribution of the species within site
 - Distribution and extent of habitats supporting the species
 - Structure, function, and supporting processes of habitats supporting the species
 - No significant disturbance of the species

6. Cromarty Firth Ramsar:

- *For the qualifying habitats mudflat, estuarine alder woodland, saltmarsh:*
 - To avoid deterioration of the qualifying habitats, thus ensuring that the integrity of the site is maintained and the site makes an appropriate contribution to achieving favourable conservation status for each of the qualifying features; and
 - To ensure for the qualifying habitats that the following are maintained in the long term:
 - Extent and distribution of the habitat on site
 - Structure and function and supporting process of the habitat
 - Distribution and viability of typical species of the habitat
- *For the qualifying habitat open water transition fen:*
 - To ensure that except where due to natural environmental change, the following are maintained in the long term:
 - Extent and distribution of the habitat on site
 - Structure and function and supporting process of the habitat
 - Distribution and viability of typical species of the habitat
- *For the qualifying bird species:*
 - Refer to the conservation objectives for Cromarty Firth SPA (listed above).

7. River Moriston SAC:

1. To ensure that the qualifying features of the River Moriston SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status.
2. To ensure that the integrity of the River Moriston SAC is restored by meeting objectives 2a, 2b, and 2c for each qualifying feature (and 2d for FWPM).

For Atlantic salmon:

- a) Restore the population of Atlantic salmon, including range of genetic types, as a viable component of the site.
- b) Restore the distribution of Atlantic salmon throughout the site.
- c) Restore the habitats supporting Atlantic salmon within the site and availability of food.

For FWPM:

- a) Restore the population of FWPM as a viable component of the site.
- b) Restore the distribution of FWPM throughout the site.
- c) Restore the habitats supporting FWPM within the site and availability of food.
- d) Restore the distribution and viability of FWPM host species and their supporting habitats.

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8. Dornoch Firth and Morrich More SAC:

1. To ensure that the qualifying features of Dornoch Firth and Morrich More SAC are in favourable condition and make an appropriate contribution to achieving favourable conservation status.
2. To ensure that the integrity of Dornoch Firth and Morrich More SAC is restored in the context of environmental changes by meeting objectives 2a, 2b, and 2c for each qualifying feature.

For qualifying habitat features:

- a) Extent and distribution of the habitat within the site
- b) Structure and function of the habitat and the supporting environment on which it relies.
- c) Distribution and viability of typical species of the habitat.

For harbour seal and otter:

- a) Harbour seals and otters are viable components of the Dornoch Firth and Morrich More SAC.
- b) The distribution of harbour seals and otters throughout the site is maintained by avoiding significant disturbance.
- c) The supporting habitats and processes relevant to harbour seal and otter are maintained, including prey resources for otter.

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Stage 1: What is the Plan or Project?

Proposal Title

A9 Kessock Bridge 10-Year Marine Licence Programme of Works

Name of Competent Authority

Transport Scotland, Marine Directorate

Name of Consultee

NS – Emma Jones, Operations Officer – Coastal Infrastructure (**Appendix A**).

Details of Proposal (Including Location, Timing and Methods)

General Information

This Habitat Regulations Appraisal (HRA) aims to cover various ‘Schemes’ and ‘Cyclic Maintenance Activities’ (detailed below), which are programmed over the next ten years on the A9 Kessock Bridge, which has connectivity with the above European Sites. The centre point of the A9 Kessock Bridge is located approximately at National Grid Reference (NGR) NH 66541 47594. The bridge spans the point where the Beaully Firth meets the Moray Firth waterbody just north of Inverness (Figure 1).

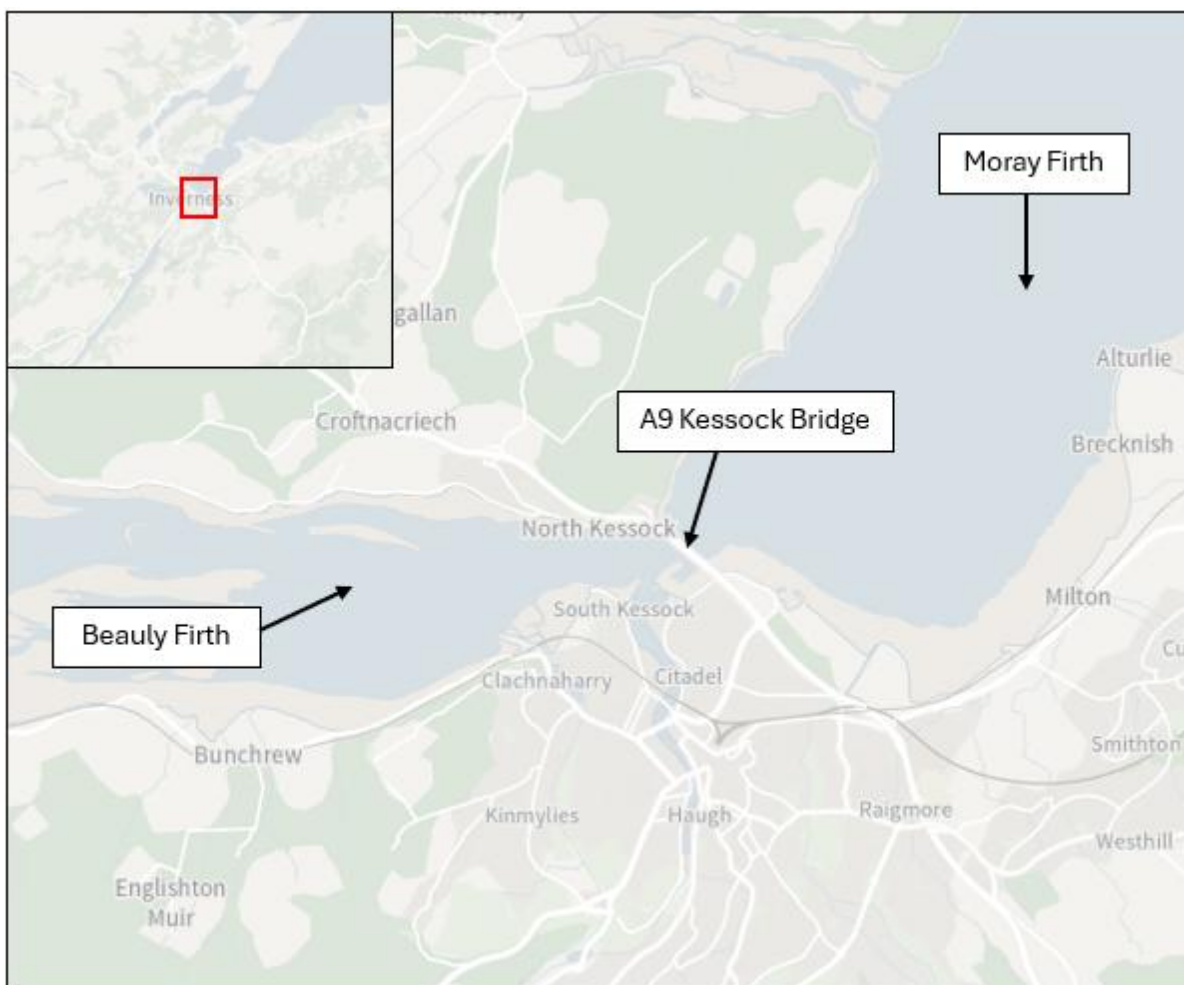


Figure 1. Location of A9 Kessock Bridge. Inset map shows location in the north of Scotland. Source: NS [Sitelink](#)

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The proposed maintenance activities are broken down into '**Schemes**' and '**Cyclic Maintenance**' works. Schemes are specific projects that are planned and will be required at some point over the next 10 years, whilst Cyclic Maintenance works are carried out regularly and may be required at any time (likely more than once) over the next 10 years. The Cyclic Maintenance activities are not necessarily planned but may be identified as required during regular inspections over the next 10 years.

A summary of the proposed maintenance works (Schemes and Cyclic Maintenance activities) is given below:

Schemes:

- Gantry friction study (rail repairs)
- Pendel bearing modifications
- Pigeon mitigation
- Deck level navigation lights
- Bridge anemometer installation
- Replacement / repair of emergency battery
- Cable stay anchor box modifications
- Structural health monitoring
- Parapet socket repairs
- Bridge strengthening
- Aerodynamic modifications
- Installation of new lighting
- Installation of ropes and ladders
- Bridge parapet replacement
- Bearing replacement
- Bridge superstructure painting
- Stay cable replacement

Cyclic Maintenance:

- Bridge resurfacing / repairs
- Stay cable painting
- Concrete repairs
- Structural bolt and weld maintenance
- Redundant steelwork removal
- Utility services
- Tuned mass dampers (TMD) works
- Drainage cleaning
- Bird guano removal
- Inspections and surveys
- Ancillary item repair / modification / replacement
- Cleaning and pressure washing of structure

Further information on each scheme or activity can be viewed in the supporting document '**Supporting Information - A9 Kessock 10-Year Programme**', which provides a detailed description of all the proposed maintenance works, including mitigation measures and access requirements where relevant. Although some larger schemes may have a duration of several months, most smaller schemes and cyclic maintenance works would have much shorter durations. Schemes and cyclic maintenance activities may take place at any time of year and may entail works during the day, at night, or both. Refer to Table 1 below for a summary of these details. All maintenance works on the bridge would be temporary and it should be noted that large schemes typically would not be carried out concurrently due to budget and network access constraints. Some works would be completed from the bridge deck, although several schemes and cyclic maintenance will require below-deck access. No major in-water works are required; only a few types of work (structural health monitoring, installation of ropes and ladders, minor concrete repairs, and inspections and surveys) have the potential to require access to the piers from the water (e.g., via small boat or barge).

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Table 1. Details of works including location on the bridge, access requirements, estimated programme, duration, seasonality, and timing.

Works Type	Works	Area of Works	Access	Estimated Programme	Duration (estimate)	Season	Timing (Day/Night)
Scheme	Gantry friction study (rail repairs)	Full length of the gantry rails along the underside of the bridge deck	Temporary access/working platforms for below-deck access	2025-2026	4 months	Any	Either, up to 7 days/week
Scheme	Pendel bearing modifications	Pendel bearing chambers below deck at Piers 6 and 9.	Deck access and temporary working platform for below-deck access.	2025-2026	1 week to 1 month	Any	Either, up to 7 days/week.
Scheme	Pigeon mitigation	Tops of all piers, all bearing shelves, and across full structure as required	Deck access. MEWP and/or temporary access/working platforms for below-deck access	2025-2026	2 weeks	Any	Either, up to 7 days/week
Scheme	Deck level navigation lights	East and west side of the bridge at Span 8 deck level	Deck access	2025-2026	2 weeks	Any	Either, up to 7 days/week
Scheme	Bridge anemometer	Top of northwest pylon (P8W) and midspan of Span 8 at deck level	Deck access; MEWP access at pylon	2025-2026	1 week	Any	Either, up to 7 days/week
Scheme	Replacement / maintenance of emergency battery	East side of bridge at platforms adjacent to pylon 7 and 8, at deck level	Deck access	2025-2026	1 week	Any	Either, up to 7 days/week
Scheme	Cable stay anchor box modifications	East and west sides of the bridge deck at cable stay anchor boxes between Spans 7 and 9	Deck access.	2026-2027	6 months	Any	Either, up to 7 days/week
Scheme	Structural health monitoring	Localised points throughout entire structure	Gantry access below deck, small boats for pier access if required	2026-2027	2 months	Any	Either, up to 7 days/week
Scheme	Parapet sockets	Bridge parapets on east and west side above deck	Deck access	2026-2027	1 month	Any	Either, up to 7 days/week
Scheme	Bridge strengthening	Steel bridge deck throughout the structure and within pylons	Deck access and temporary working platform for below-deck access	2026-2030	1 week to 1 month	Any	Either, up to 7 days/week
Scheme	Aerodynamic modifications	Across the underside of bridge deck at Span 8	Gantry and temporary mobile access/working platforms below deck	2027-2028	6 months	Any	Either, up to 7 days/week
Scheme	Lighting works	Bridge deck	Temporary access/working platforms on bridge deck	2027-2028	3 months	Any	Either, up to 7 days/week
Scheme	Ropes and ladders	All piers below bridge deck at water level	Temporary access/working platforms. Boat access	2027-2028	2 months	Any	Either, up to 7 days/week
Scheme	Bridge parapet replacement	Bridge footpath on east and west sides, all spans	MEWP and temporary working platforms for access to edge of deck	2028-2030	6 months	Any	Either, up to 7 days/week
Scheme	Bearing replacement	At the top of each pier below deck level	Deck access and temporary working platform for below-deck access.	2029-2033	6 months to 1 year	Any	Either, up to 7 days/week
Scheme	Bridge superstructure painting	Full structure from Span 2 to Span 13, including cross boxes, pylons, and parapets	Temporary access/working platforms (static and mobile) for below-deck access and around pylons.	2033-2036	Phased works over 2 years	Any	Either, up to 7 days/week
Scheme	Stay cable replacement	East and west sides of the bridge deck between Spans 7 and 9	Deck access and temporary access/working platform.	2033-2034	Phased works from 2 weeks to 10 months	Any	Either, up to 7 days/week
Cyclic	Bridge resurfacing / repairs	Carriageway, footways, and bridge approaches at deck level	Deck access	As required during 2026-2036	1-3 months	Any	Either, up to 7 days/week

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Cyclic	Stay cable painting	On stay cables between the deck and pylons at Spans 7 to 9, east and west side	Temporary access/working platforms for deck/pylon access	As required during 2026-2036	2 months	Any	Either, up to 7 days/week
Cyclic	Minor concrete repairs	Throughout bridge deck and/or piers (including below tide level)	Deck access. Gantry, MEWP and/or temporary access/working platforms for below-deck access. Barges for access to piers below water level.	As required during 2026-2036	1 week to 2 months	Any	Either, up to 7 days/week
Cyclic	Structural bolt and weld maintenance	Throughout full structure	Deck access. Gantry, MEWP and/or temporary access/working platforms for below-deck access	As required during 2026-2036	1 day to 2 months	Any	Either, up to 7 days/week
Cyclic	Redundant steelwork removal	Underside of bridge deck	Temporary access/working platforms for below-deck access	As required during 2026-2036	1 month	Any	Either, up to 7 days/week
Cyclic	Utility services	Water mains and electricity cables below bridge deck	Gantry, MEWP and/or temporary access/working platforms for below-deck access	As required during 2026-2036	1 week	Any	Either, up to 7 days/week
Cyclic	Tuned mass dampers (TMD) works	Beneath bridge deck at the 8 TMD at Span 8	Gantry, MEWP and/or mobile temporary access/working platforms for below-deck access	As required during 2026-2036	1 week	Any	Either, up to 7 days/week
Cyclic	Drainage cleaning	Gullies on bridge deck, beneath deck, and abutment chambers	Deck and abutment access	As required during 2026-2036	1 week	Any	Either, up to 7 days/week
Cyclic	Bird guano removal	All bearing shelves on piers and abutments, above and below bridge deck	Deck and abutment access	As required during 2026-2036	1 week	Any	Either, up to 7 days/week
Cyclic	Inspections and surveys	Entire structure and foundations on seabed	Deck access; gantry, scaffolding or MEWP for below-deck access; roped access; drones; barges and small boats; dive surveys	As required during 2026-2036	1 week	Any	Either, up to 7 days/week
Cyclic	Ancillary item repair / modification / replacement	Bridge deck throughout structure	Deck access; temporary access platform may be required.	As required during 2026-2036	3 days	Any	Either, up to 7 days/week
Cyclic	Cleaning and pressure wash superstructure	Soffit and gantry rail below bridge deck	Gantry access below deck	As required during 2026-2036	1 day	Any	Either, up to 7 days/week

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 and travel downstream during the works. These measures and working practices would be in place regardless of the presence of nearby designated sites and therefore are not considered to be specific 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 B** for details of these good practice measures.

The majority of works would be carried out following the good practice measures outlined in **Appendix B** and in the attached Programme of Works document. However, please note that this HRA is not intended to cover the proposed activities if the scope of works is beyond what has been described below for each activity. In these cases, additional consultation with NS will be carried out and a separate HRA Proforma will be produced specific to those works.

Activity-specific methods

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Details on methods and specific working practices for each of the above maintenance activities is provided in the supporting document '**Supporting Information - A9 Kessock 10-Year Programme**'; however, some proposed methods for access and/or works beneath the bridge deck or within the Beaully Firth are highlighted below.

All activities are highly localised and will take place within the immediate vicinity of the trunk road and bridge structure. All maintenance works will be temporary and are unlikely to be carried out simultaneously with any other maintenance works due to traffic management restrictions and budget constraints within individual financial years.

Access from the water or below the bridge deck

Various access requirements may be required to facilitate some of the above activities, particularly for works below the bridge deck and/or works requiring access from the water. Types of access may include (but are not limited to) the following:

- The existing gantry along the underside of the bridge deck.
- Lorry-mounted mobile elevated working platform (MEWP).
- MEWP with underbridge capabilities (underbridge unit).
- Temporary fixed working platforms (e.g., scaffolding) which may be suspended from the bridge or footed on the ground below.
- Temporary mobile working platforms.
- Barges.
- Small boats for access or inspections.

In line with health and safety requirements, any work being carried out beneath the bridge will require an adequate working platform and edge protection to prevent any workers or materials from falling. In line with good practice, this platform and edge protection containment will be achieved by the attachment of either debris netting or thickened sheets to prevent materials falling from the platform. Where an underbridge unit is required, the vehicle basket will be positioned beneath the working area to contain any construction materials or pollutants.

In-water works are not currently expected to be required over the next 10 years. However, a few types of work will require access from the water, either by boat or barge. In line with good practice, strict containment measures will be in place on any barges or boats to prevent pollution incidents in the marine environment.

Grit-blasting and painting

The bridge superstructure painting scheme will entail grit-blasting of old paint and application of a new protective coating of paint (incorporating a fluoropolymer topcoat) to the structural steelwork of the bridge, including below-deck steelwork and girders, cross boxes, pylons, and parapets. A temporary access scaffolding will be installed and fully encapsulated in shrink wrap. A blast cabin will be located around the work area with blast lines inside the encapsulated area to remove the old paint. A vacuum unit with hoses will be used to take away the spent blast grit and old paint coatings. Painting equipment with spray lines will be used to apply the new coatings and heaters will be used to keep ambient temperatures suitable for drying the new coatings.

The bridge strengthening scheme may also require grit-blasting to remove old paint from steelwork. Similar methods to the above will be used where grit-blasting is required.

Stay cable painting works will be carried out by hand using roped access and/or MEWPs. Suspended temporary access platforms will be used with edge protections and appropriate containment measures to capture any paint or debris.

Minor localised paint repairs may be required following completion of various other works. Appropriate containment measures will be in place around any temporary working/access platforms, as described above.

Removal of lead paint

Paint containing approximately 1% lead is present on internal surfaces of the four towers of A9 Kessock Bridge. All external paint on the bridge was confirmed by testing to have negligible levels of lead present. The full bridge painting scheme will include removal of paint from internal surfaces within the towers and re-painting of these surfaces. As

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noted above, full encapsulation will be employed during grit-blasting/mechanical surface preparation and painting works, including for internal surfaces within the towers. Licensed contractors will remove the paint within the towers, which will be removed from site by a licensed special waste carrier.

Hydro-demolition

The bearing replacement scheme and some concrete repair works will require the use of hydro-demolition where the use of hand tools is not sufficient. Where access from the water or below the deck is required for hydro-demolition works, the containment measures described above for 'Access from the water or below the bridge deck' would apply. In addition, the floor of the platform will be layered with materials (e.g., Terram and Visqueen layers) to fully contain the water and debris produced during hydro-demolition. Concrete fragments that land on the access system floor during large or small repair works will be collected, taken to the surface of the bridge, and removed from site by licensed waste carriers.

For works on the deck of the bridge, debris netting or sheeting will be applied around the working area to prevent materials and/or hydro-demolition water from entering the water environment. Material will be collected in the same manner as described above and removed from the site by licensed waste carriers.

Wastewater generated from hydro-demolition works is considered to be a trade effluent and is required to either be collected and removed off-site for disposal under appropriate permits/authorisation or discharged on site with appropriate consents in place from SEPA to comply with the Environmental Authorisations (Scotland) Regulations 2018 ('EASR'). For some hydro-demolition works at A9 Kessock Bridge, the appointed subcontractor may be responsible for obtaining appropriate consents or authorisation to discharge or otherwise dispose of wastewater. Wastewater to be discharged must be captured and treated (e.g., via a Siltbuster or similar equipment) to reduce pH and suspended solids to an acceptable level. Typically, a pH value between 5-9 and a suspended solids value between 80-100mg/l is considered acceptable for discharge. The volume and rate of discharge will be agreed with SEPA and would determine the level of authorisation required to permit the discharge. Discharging to a location on land will be planned where possible and will be the preferred option over discharging direct to the marine environment. Authorisation will be sought from SEPA to permit discharge of wastewater as required on a scheme-by-scheme basis and no discharges will take place until the appropriate authorisation is secured.

Additional Considerations

This is an iterative document and will be subject to periodic review or when there are any relevant changes to the method of works or qualifying features of any of the designated sites. Any changes or updates will be documented in the Document Control section on the cover page of this document.

This document does not negate the need to consult with the Marine Directorate, and any subsequent licence conditions will be adhered to throughout construction. This document does not negate the requirement to consult with other statutory consultees such as the Highland Council, local District Salmon Fishery Boards (DSFB)/Trusts and SEPA. Any subsequent advice and/or consents will be followed during works.

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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.

None of the activities covered by this document are 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 maintenance activities on the qualifying features of the following designated sites with relevant component SSSIs:

1. **Moray Firth SAC** – within/adjacent to area of works
2. **Moray Firth SPA** – within/adjacent to area of works
3. **Inner Moray Firth SPA and Inner Moray Firth Ramsar** – 2.18km southeast of works at nearest point
 - Longman and Castle Stuart Bays SSSI (all features)
 - Beaully Firth SSSI (all features)
 - Munlochy Bay SSSI (all features)
4. **Cromarty Firth SPA and Cromarty Firth Ramsar** – 13.38km north of area of works
 - Cromarty Firth SSSI (all features)
5. **River Moriston SAC** – 41.68km (via connected waterbodies) southwest of area of works
6. **Dornoch Firth and Morrich More SAC** – 59.00km (via connected waterbodies) north of area of works

Although SSSIs are not subject to HRA, we have included an assessment of potential effects on four component SSSIs within the assessments of the relevant European Sites below for completeness.

Where a European Site overlaps with a Ramsar Site and both are designated for the same or related features, these have been grouped into one assessment for brevity as the potential effects of works will be the same.

If the scope of works is beyond what has been detailed in Stage 1 for each activity, additional consultation with NS will be carried out and a separate HRA Proforma will be produced specific to those works.

Assessment of the potential effects of the proposed maintenance activities has been carried out below. Qualifying features for each site have been grouped where possible for brevity.

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1. Moray Firth SAC

The eastern boundary of the Moray Firth SAC extends from a line drawn from Helmsdale southeast to Lossiemouth. The site extends southwest to the Inner Moray Firth (including part of the Beaully Firth) just west of Inverness. The SAC includes parts of the Beaully Firth and Dornoch Firth but excludes the Cromarty Firth except for where it joins the wider Moray Firth near the tip of the Black Isle.

The SAC is designated for the Annex I habitat 'sandbanks which are slightly covered by sea water all the time' and for bottlenose dolphin, which is a priority marine feature.

The A9 Kessock Bridge spans the SAC at the narrow point between Inverness and North Kessock where the Moray Firth joins the Beaully Firth.

Assessment against the conservation objectives for bottlenose dolphin

Bottlenose dolphins are wide-ranging cetaceans (and a European Protected Species) that inhabit the coastal waters around Scotland. There is a highly mobile population of bottlenose dolphins along the east coast of Scotland that has been well studied via photographic mark-recapture surveys for the past several decades and is estimated to be comprised of approximately 224 dolphins (NS 2021, Arso Civil et al. 2021). Site condition monitoring and a review of available survey data carried out in 2014-2016 suggested that an average of 103 dolphins use the Moray Firth SAC between May and September each year, although this number is likely to have increased since 2016 (Cheney et al. 2018, Arso Civil et al. 2021).

Bottlenose dolphins can be sensitive to four main pressures that can affect their survival and distribution across the site (NS 2021), including:

- Entanglement of bottlenose dolphins in fishing gear.
- Death or injury of bottlenose dolphins due to collisions (predominantly with fast-moving vessels and tidal turbines).
- Disturbance from underwater noise.
- Contaminants (e.g., through effects on water quality and bioaccumulation of contaminants in prey species of bottlenose dolphins).

The proposed works at A9 Kessock Bridge do not entail any fishing. However, some works would require the use of vessels which could result in collisions with bottlenose dolphins and create underwater noise. All works have potential to result in pollution of the marine environment, which may affect bottlenose dolphins and/or their prey species as they are highly mobile and have been known to use areas near A9 Kessock Bridge. Consequently, the proposed works could contribute to some of the above pressures, which could in turn affect the survival and distribution of bottlenose dolphins within the SAC. Therefore, **LSE on bottlenose dolphins as a result of proposed works cannot be ruled out, and this feature is considered further in Stage 4.**

Assessment against the conservation objectives for subtidal sandbanks

Subtidal sandbank habitat consists of sandy sediments that are generally found at depths of less than 20m below chart datum but may include channels or other areas greater than 20m deep (JNCC 2024). Within the Moray Firth SAC, the most extensive areas of subtidal sandbanks are found just east of Inverness, just east of the Dornoch Firth, and along the coast between Findhorn and Lossiemouth (NS 2021). Subtidal sandbanks are sensitive to physical disturbance or changes in water quality and have a low resilience to the introduction or spread of invasive non-native species (NS 2021). Subtidal sandbanks are known to be present in the vicinity of A9 Kessock bridge, with the nearest areas of this habitat located approximately 150m northeast of the bridge and approximately 2km west of the bridge ([National Marine Plan Interactive](#)).

No in-water works are planned and only a small number of proposed works will require access from the water (e.g., using boats or barges). Therefore, the risk of works resulting in physical disturbance to subtidal sandbanks is low. However, there is a risk that water quality could be affected due to pollution events during any works on the bridge or by hydro-demolition discharge (if required). Consequently, the proposed works could contribute to pressures faced by subtidal sandbanks, which could in turn affect the conservation status of subtidal sandbanks within the SAC. Therefore, **LSE on subtidal sandbanks as a result of proposed works cannot be ruled out, and this feature is considered further in Stage 4.**

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Conclusion:

Taking the above into account, **LSE on bottlenose dolphins and subtidal sandbanks cannot be ruled out at this stage and these features are considered further in Stage 4.** An assessment of potential cumulative or in-combination effects is for these features is included in Stage 4.

2. Moray Firth SPA

The Moray Firth SPA covers much of the same area as the Moray Firth SAC. It extends from Portsoy in the east to the Inner Moray Firth (including part of the Beaully Firth) and up the coast to approximately halfway between Helmsdale and Dunbeath (excluding the Cromarty Firth and Dornoch Firth).

The SPA is designated for 10 species of overwintering waterfowl, including the Annex I species great northern diver, red-throated diver, and Slavonian grebe, and breeding and non-breeding populations of shag. The Moray Firth is an important spawning ground and nursery area for a number of fish species, which together with abundant bivalve molluscs, are important prey species for the qualifying bird species.

The A9 Kessock Bridge spans the Moray Firth SPA at the narrow point between Inverness and North Kessock where the Moray Firth joins the Beaully Firth.

Assessment against the conservation objectives for all qualifying bird species

The Moray Firth SPA supports a range of overwintering wildfowl species which are known to forage and roost within the designated site boundaries. All species are noted to be sensitive to entanglement or incidental bycatch and some form of disturbance (e.g., from vessel movements, marine developments, recreation). Most species are also sensitive to pollution, changes in prey availability, and collision with vessels or structures (either above or below water). A few additional pressures were highlighted for individual species, including severe weather (European shag), microbial pathogens (long-tailed duck), and changes in water clarity associated with aggregate extraction or dredging (Slavonian grebe) (NS 2022).

The proposed works will not entail any fishing or use of equipment that could result in entanglement or incidental bycatch of the qualifying species and the risk of proposed works increasing these known pressures is considered to be negligible. Severe weather events are unpredictable and are not associated with the proposed works; therefore, this risk is not considered further. However, as populations of the qualifying bird species are likely to be present within the vicinity of A9 Kessock Bridge, proposed works may contribute to the other noted pressures on these species which could in turn affect the survival and distribution of these species within the SPA. Therefore, **LSE on all qualifying bird species as a result of proposed works cannot be ruled out, and these features are considered further in Stage 4.**

Conclusion

Due to the high mobility of the qualifying bird species and nature of some of the proposed works, **LSE on all qualifying bird species within Moray Firth SPA cannot be ruled out at this stage. These features are considered further in Stage 4, including an assessment of cumulative and in-combination effects.**

3. Inner Moray Firth SPA and Inner Moray Firth Ramsar

Includes assessment of all features for Longman and Castle Stuart Bays SSSI, Beaully Firth SSSI, and Munloch Bay SSSI for completeness.

The Inner Moray Firth SPA/Ramsar sites overlap and cover three main areas of the wider Moray Firth, including both shores at the head of the Beaully Firth, Munloch Bay, Longman Bay, and Castle Stuart Bay within the Inverness Firth, and Whiteness Head at the mouth of the Inverness Firth. All of these areas are designated as SSSIs. The Beaully Firth area of the SPA/Ramsar and SSSI is located approximately 2.18km southeast A9 Kessock bridge, the Munloch Bay area of the SPA/Ramsar and SSSI is located approximately 4.59km northwest of the bridge, and the Longman and Castle Stuart Bays area of the SPA Ramsar and SSSI is located approximately 2.81km southwest of the bridge. Distances given are straight-line distances to the nearest point of the SPA/Ramsar/SSSI from the A9 Kessock Bridge. The Inner Moray Firth SPA/Ramsar and associated SSSIs encompass a variety of coastal and wetland habitat types that support large populations of several wader and wildfowl species.



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Assessment against the conservation objectives for breeding common tern and osprey

Common terns are summer visitors to the UK that feed primarily on fish and, in Scotland, typically breed in coastal areas between April and July, leaving in late summer to head south for the winter (Goodship and Furness 2022, British Trust for Ornithology (BTO) 2024a). The SPA/Ramsar are known to support common tern populations of European importance, which breed and forage within the SPA/Ramsar. Common terns are sensitive to recreation and disturbance.

Osprey are also summer visitors to the UK that feed primarily on fish and generally nest in trees or on artificial platforms near fresh water (Goodship and Furness 2022). The SPA/Ramsar are known to support osprey populations of European importance, which regularly forage within the SPA/Ramsar. The Citation for the SPA noted that between 2008 and 2012, up to 25 osprey territories were present within foraging range of the SPA/Ramsar and four breeding pairs were recorded within the SPA boundary (NS 2018). Advice was sought from the Highland Raptor Study Group (HRSG) in December 2024 for separate works at the north abutment of A9 Kessock Bridge. The HRSG confirmed that they had no records of active osprey nests within 1km of A9 Kessock Bridge at that time. No negative pressures for osprey are noted in the site documents for Inner Moray Firth SPA or Ramsar; however, osprey are expected to be sensitive to certain types of disturbance.

As there is potential for breeding or foraging osprey to be present within the vicinity of proposed works on A9 Kessock Bridge, **proposed works may result in LSE on breeding or foraging common terns and osprey within the SPA/Ramsar. These features are assessed further in Stage 4.**

Assessment against the conservation objectives for overwintering birds

Includes assessment of overwintering birds in Beaully Firth SSSI, Munloch Bay SSSI, and Longman and Castle Stuart Bays SSSI for completeness.

The Inner Moray Firth SPA/Ramsar and component SSSIs support a range of overwintering wader and wildfowl species which are known to forage and roost within the designated site boundaries. The majority of the overwintering bird species are noted to be sensitive to recreation and disturbance. No negative pressures for greylag geese or whooper swan were noted in the site documents for Inner Moray Firth SPA or Ramsar; however, they are expected to be sensitive to certain types of disturbance.

As populations of overwintering birds are likely to be present within the vicinity of proposed works at A9 Kessock Bridge, **proposed works may result in LSE on overwintering or foraging birds within the SPA/Ramsar/SSSIs. These features are assessed further in Stage 4.**

Assessment against the conservation objectives for qualifying habitats

Includes assessment of qualifying habitats (eelgrass beds, mudflats, saltmarsh, vascular plant assemblage) in Beaully Firth SSSI, Munloch Bay SSSI, and Longman and Castle Stuart Bays SSSI for completeness.

The qualifying habitats for Inner Moray Firth Ramsar include marine habitats (intertidal mudflats and sandflats) and coastal habitats (saltmarsh, sand dunes, shingle) which provide supporting habitat for the qualifying bird species of the SPA/Ramsar. The three component SSSIs are also designated for some marine and coastal habitats which likely provide supporting habitat for the qualifying bird species within Inner Moray Firth SPA/Ramsar and SSSIs. No negative pressures have been noted for intertidal mudflats and sandflats. However, negative pressures including invasive species, recreation/disturbance, and over- or under-grazing have been noted for the coastal habitats. The only one of these pressures that could be affected by proposed works is the spread of invasive species. The risk of direct effects (e.g., habitat loss, mortality of typical species) and indirect effects (e.g., pollution, spread of invasive species) on the qualifying habitats as a result of proposed works at A9 Kessock Bridge are considered below.

Risk of direct effects

As noted, the distance between the SPA/Ramsar/SSSIs and the area of works at A9 Kessock Bridge is over 2km via straight-line distance. None of the proposed maintenance activities at A9 Kessock Bridge would entail works within the boundaries of these sites. Due to the distance from the bridge and lack of working areas within the site boundaries, connectivity between the A9 Kessock Bridge and areas of qualifying habitats within the Inner Moray Firth Ramsar and component SSSIs is highly limited. Consequently, no direct effects (e.g., habitat loss, mortality of typical species due to construction activities or vehicles) on the qualifying habitat or its typical species within the SPA/Ramsar/SSSIs will result from the proposed maintenance activities.

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Risk of indirect effects

For all of the proposed maintenance activities, there is potential for indirect effects on the qualifying habitats as a result of pollution from construction activities or from discharge of water used in hydro-demolition. However, the A9 Kessock Bridge is located over 2km (straight-line distance) from the SPA/Ramsar and nearest SSSI (Longman and Castle Stuart Bays) and no in-water works are planned; therefore, there is limited hydrological connectivity between these sites and the area of works within the Inner Moray Firth. Consequently, there is limited potential for works to result in indirect effects on the qualifying habitats and their typical species as a result of pollution, even for activities where in-water access is required. The standard and activity-specific working practices noted in Stage 1 and Appendix B include robust containment measures to prevent pollution events for all works, including activities requiring access from the water. Furthermore, as noted in Stage 1, full encapsulation will be in place for certain activities that pose a higher risk of pollution (e.g., grit-blasting, painting, hydro-demolition) to ensure that all debris, materials, and wastes are contained and removed from site. Water used in hydro-demolition will be captured, appropriately treated to reduce pH and suspended solids, and removed or (where required) discharged under an appropriate authorisation from SEPA. The volume and rate of discharge will be agreed with SEPA and will determine the level of authorisation required to permit discharge. Treatment of water prior to discharge will be carried out with appropriate values for pH and suspended solids stipulated in the SEMP. Typically, a pH value between 5-9 and a suspended solids value between 80-100mg/l is considered acceptable for discharge. Discharging to a location on land will be planned where possible and will be the preferred option over discharging to the marine environment. Authorisation will be sought from SEPA to permit discharge of wastewater as required on a scheme-by-scheme basis and no discharges will take place until the appropriate authorisation is secured.

None of the works involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Inner Moray Firth / Beaully Firth and therefore will not affect any water management activities within the Inner Moray Firth Ramsar. The invasive non-native species slipper limpet (*Crepidula fornicata*), chain tunicate (*Botrylloides violaceus*), and orange ripple bryozoan (*Schizoporella japonica*) have been recorded in the Cromarty and Moray Firths ([National Marine Plan Interactive](#)); however, the standard and activity-specific working practices noted in Stage 1 and Appendix B also include provisions to reduce the risk of transporting invasive species during works following guidance from NS (Cook et al. 2014) and the Great Britain Non-Native Species Secretariat (NNSS), such as washing equipment or vehicles prior to moving between water bodies and utilising a 'Check Clean Dry' methodology. These, in combination with standard containment measures, are expected to significantly reduce the risk of transporting invasive species within or around the Inner Moray Firth and wider marine environment. Therefore, the risk of indirect effects on the qualifying habitats of the SPA/Ramsar/SSSIs as a result of pollution or spread of invasive species during proposed works at A9 Kessock Bridge is considered to be low.

Cumulative and in-combination effects – qualifying Ramsar habitats

Although the proposed activities will be highly localised to the A9 Kessock Bridge and immediate vicinity, the timing of works over the next 10 years has not yet been confirmed. The proposed works in the 10-year programme also range from very minor reactive maintenance activities that could take one or two days to complete to larger planned schemes that could take several months to complete, and which may not take place for several more years. Consequently, it is not practicable at this time to search for other plans or projects that may have cumulative or in-combination effects until individual maintenance schemes are designed and submitted for environmental assessment. As noted above, a search will be undertaken for other plans and projects that could have cumulative or in-combination effects in the vicinity of the proposed maintenance works on a case-by-case basis once individual maintenance schemes are designed and submitted for environmental assessment. If there is potential for these effects, additional consultation will be carried out with NS. However, considering the nature and scale of each of the maintenance activities and the distance between the Inner Moray Firth SPA/Ramsar/SSSIs and the A9 Kessock Bridge, 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 of most proposed maintenance activities. Although some minor cyclic maintenance could be carried out during or close to the timing of a larger scheme, any planned larger schemes at A9 Kessock Bridge or other major trunk road bridges (e.g., A9 Cromarty Bridge, A9 Dornoch Bridge) typically would not be carried out concurrently or within the same financial year due to budget limitations and required lead-in time for tendering and mobilisation, which reduces the risk of significant cumulative or in-combination effects due to disturbance on and around the bridge. 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

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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 construction noise and activities is also limited.

Overall, due to the nature and scale of the proposed activities, the distance between the area of works and the designated sites, and the limited potential for overlap of any activities during the 10-year programme, it is highly unlikely that any of the proposed maintenance activities would result in significant cumulative or in-combination effects on the qualifying features of the Inner Moray Firth SPA/Ramsar and component SSSIs.

Conclusion:

Due to the high mobility of the qualifying bird species and nature of some of the proposed works, **LSE on the qualifying bird species within Inner Moray Firth SPA/Ramsar cannot be ruled out at this stage. These features are considered further in Stage 4, including an assessment of cumulative and in-combination effects.**

Taking into account the distance between the area of works at A9 Kessock Bridge and the Inner Moray Firth SPA/Ramsar alongside the good working practices for pollution control as noted in Stage 1 and Appendix B, **no LSE, either alone or in combination with other projects, have been identified on any of the qualifying habitats of the Inner Moray Firth Ramsar as a result of the proposed activities and all conservation objectives for these features will be met. These features are not considered further.**

Similarly, no significant negative impacts have been identified on any of the qualifying habitats of the Beaully Firth SSSI, Munloch Bay SSSI, or Longman and Castle Stuart Bays SSSI as a result of the proposed works and these features are not considered further. However, potential effects on the qualifying bird species of these SSSIs are considered further in Stage 4.

4. Cromarty Firth SPA and Cromarty Firth Ramsar

Includes assessment of features of Cromarty Firth SSSI (all features) for completeness.

The Cromarty Firth is a large, narrow estuary that extends for approximately 30km from the mouth of the River Conon northeast to where it joins the wider Moray Firth at Cromarty. The Cromarty Firth SPA encompasses both coasts of the Cromarty Firth, including extensive areas of intertidal flats, which are the largest in the Moray Firth. The intertidal habitats present in the Cromarty Firth support a wide variety of marine invertebrates, which in turn support nationally and internationally important numbers of wintering wildfowl and wading birds. The Cromarty Firth SPA overlaps with the Cromarty Firth Ramsar site and the Cromarty Firth SSSI.

The A9 Kessock Bridge is located approximately 13.38km (straight-line distance) from the Cromarty Firth SPA/Ramsar/SSSI at the nearest point.

Assessment against the conservation objectives for breeding common tern and osprey

Common terns are summer visitors to the UK that feed primarily on fish and, in Scotland, typically breed in coastal areas between April and July, leaving in late summer to head south for the winter (Goodship and Furness 2022, British Trust for Ornithology (BTO) 2024a). Osprey are also summer visitors to the UK that feed primarily on fish and generally nest in trees or on artificial platforms near fresh water (Goodship and Furness 2022). The SPA/Ramsar are known to support osprey and common tern populations of European importance, which regularly breed and forage within the SPA/Ramsar. The risk of direct effects (e.g., mortality during construction, habitat loss) and indirect effects (e.g., pollution, disturbance) on breeding common tern and osprey as a result of proposed works at A9 Kessock Bridge are considered below.

Risk of direct effects

No works will take place within the boundaries of the SPA/Ramsar; therefore, works will not result in any loss of supporting habitats for osprey or common terns within the SPA/Ramsar. Due to the distance between these sites and the area of works, the risk of injury or mortality of these species during construction is considered to be negligible.

Risk of indirect effects

Pollution during works at the A9 Kessock Bridge could potentially affect supporting habitats or food resources of breeding common terns and osprey within the SPA/Ramsar. However, although the shortest distance between the Cromarty Firth SPA/Ramsar and A9 Kessock Bridge is 13.38km, this is a straight-line distance over land. The distance between connected waterways is significantly greater, as water would need to travel a much further distance from the bridge around the Black Isle peninsula and into the Cromarty Firth. Due to this highly limited hydrological



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connectivity between the area of works and the SPA/Ramsar, the risk of effects on breeding common terns and osprey within the SPA/Ramsar as a result of pollution from works on the A9 Kessock Bridge is considered to be negligible.

Although the SPA/Ramsar is located 13.38km (straight-line distance) from the A9 Kessock Bridge, common terns and osprey associated with the Cromarty Firth SPA/Ramsar may commute or forage in the Inner Moray Firth near the area of works. As recreation and disturbance are noted pressures for common terns and osprey within the SPA/Ramsar, proposed works at A9 Kessock Bridge could result in disturbance of these species. NS recommends a disturbance buffer of 200-400m for common tern during the breeding season and a disturbance buffer of 350-750m for osprey during the breeding season (Goodship and Furness 2022). These distances are significantly less than the closest distance between the A9 Kessock Bridge and the Inner Moray Firth SPA/Ramsar, so disturbance of common terns or osprey nesting in the Cromarty Firth SPA/Ramsar will not occur. Common terns and osprey that may forage in the vicinity of works are unlikely to be significantly disturbed by works at A9 Kessock Bridge, as the area of works would only affect a small area of the potential foraging habitat within the Inner Moray Firth and there is ample alternative foraging habitat in other parts of the Inner Moray Firth that would be available outside the disturbance distance for these species. There is also plenty of suitable foraging habitat for common terns and osprey within the Cromarty Firth SPA/Ramsar boundary outwith the direct works area which they would be more likely to use. Therefore, the risk of indirect effects on these species as a result of disturbance from works at A9 Kessock Bridge is considered to be negligible.

Assessment against the conservation objectives for overwintering birds

Includes assessment of overwintering birds in Cromarty Firth SSSI for completeness.

The Cromarty Firth SPA/Ramsar and component SSSIs support a range of overwintering wader and wildfowl species. These species are highly mobile and may be present within proximity of the A9 Kessock Bridge. Therefore, the risk of direct effects (e.g., mortality, habitat loss) and indirect effects (pollution of supporting habitats, disturbance) on overwintering birds within the SPA/Ramsar/SSSI as a result of proposed works are considered below.

Risk of direct effects

No works will take place within the boundaries of the Cromarty Firth SPA/Ramsar or SSSI; therefore, works will not result in any loss of supporting habitats for overwintering birds within the SPA/Ramsar/SSSI. Due to the distance between these sites and the area of works, the risk of injury or mortality of these species during construction is considered to be negligible.

Risk of indirect effects

Pollution during works at the A9 Kessock Bridge could potentially affect supporting habitats or food resources of overwintering birds within the Cromarty Firth SPA/Ramsar/SSSI. However, although the shortest distance between the Cromarty Firth SPA/Ramsar and A9 Kessock Bridge is 13.38km, this is a straight-line distance over land. The distance between connected waterways is significantly greater, as water would need to travel a much further distance from the bridge around the Black Isle peninsula and into the Cromarty Firth. Due to this highly limited hydrological connectivity between the area of works and the SPA/Ramsar/SSSI, the risk of effects on overwintering birds within the SPA/Ramsar/SSSI as a result of pollution from works on the A9 Kessock Bridge is considered to be negligible.

The SPA/Ramsar/SSSI are located 13.38km (straight-line distance) from the A9 Kessock Bridge. NS's recommended disturbance buffers during the non-breeding season for eleven of the twelve non-breeding qualifying bird species (including greylag geese) are less than the distance between the Cromarty Firth SPA/Ramsar/SSSI and A9 Kessock Bridge (Goodship and Furness 2022). No information on disturbance distances was available for the other species (red-breasted merganser) but it is expected that mergansers would have comparable disturbance distances to similar species. Of the twelve overwintering bird species, only greylag geese have a foraging range that could come within disturbance distance of the working area at A9 Kessock Bridge. Therefore, individual greylag geese that are associated with the Cromarty Firth SPA/Ramsar/SSSI may have potential to use parts of the Inner Moray Firth (NS 2016a; Fijn et al 2022). The rest of the species in this group are more likely to be present in or near the Cromarty Firth SPA/Ramsar/SSSI and individuals associated with the Cromarty Firth sites are unlikely to use the Inner Moray Firth. Therefore, for the majority of overwintering bird species, there is no connectivity between the area of works and the Cromarty Firth SPA/Ramsar/SSSI and there is no pathway to effect via disturbance.

Although greylag geese associated with the Cromarty Firth SPA/Ramsar may forage within the Inner Moray Firth, they are unlikely to be significantly disturbed by works at A9 Kessock Bridge, as the area of works would only affect

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a small area of the potential foraging habitat within the Inner Moray Firth. There is also ample alternative foraging habitat in other parts of the Inner Moray Firth that would be available outside the disturbance distance for these species. The Cromarty Firth SPA/Ramsar/SSSI support plentiful foraging habitat which foraging geese associated with those sites would be more likely to use. Therefore, the risk of indirect effects on this species as a result of disturbance from works at A9 Kessock Bridge is considered to be negligible.

Assessment against the conservation objectives for Ramsar qualifying habitats

Includes assessment of qualifying habitats (mudflats, sandflats, saltmarsh) in Cromarty Firth SSSI for completeness.

The qualifying habitats for Cromarty Firth Ramsar include intertidal mudflats and sandflats, saltmarsh, estuarine alder woodland, and open water transition fen. The component SSSI is also designated for some of these habitats, which likely provide supporting habitat for the qualifying bird species within Cromarty Firth SPA/Ramsar/SSSI. Invasive species have been noted as a pressure for mudflats and sandflats. Negative pressures including agricultural operations, climate change, development, over-grazing, and water management have been identified for coastal habitats. The only one of these pressures that could be affected by proposed works is the spread of invasive species. The risk of direct effects (e.g., habitat loss, mortality of typical species) and indirect effects (e.g., pollution, spread of invasive species) on the qualifying habitats as a result of proposed works at A9 Kessock Bridge are considered below.

Risk of direct effects

As noted, the distance between the SPA/Ramsar/SSSIs and the area of works at A9 Cromarty Bridge is over 13km via straight-line distance. None of the proposed maintenance activities at A9 Kessock Bridge would entail works within the boundaries of these sites and there is no connectivity between the area of works and the qualifying habitats. Due to the distance from the bridge and lack of connectivity, no direct effects (e.g., habitat loss, mortality of typical species due to construction activities or vehicles) on the qualifying habitat or its typical species within the SPA/Ramsar/SSSI will result from the proposed maintenance activities.

Risk of indirect effects

The A9 Kessock Bridge is located over 13km (straight-line distance) from the Cromarty Firth SPA/Ramsar/SSSI and no in-water works are planned; therefore, there is very limited hydrological connectivity between these sites and the area of works within the Inner Moray Firth. Consequently, there is limited potential for works to result in indirect effects on the qualifying habitats and their typical species as a result of pollution, even for activities with in-water access requirements. The standard and activity-specific working practices noted in Stage 1 and Appendix B include robust containment measures to prevent pollution events for all works, including activities requiring access from the water. Furthermore, as noted in Stage 1, full encapsulation will be in place for certain activities that pose a higher risk of pollution (e.g., grit-blasting, painting, hydro-demolition) to ensure that all debris, materials, and wastes are contained and removed from site. Water used in hydro-demolition will be captured, appropriately treated to reduce pH and suspended solids, and removed or (where required) discharged under an appropriate authorisation from SEPA. The volume and rate of discharge will be agreed with SEPA and will determine the level of authorisation required to permit discharge. Treatment of water prior to discharge will be carried out with appropriate values for pH and suspended solids stipulated in the SEMP. Typically, a pH value between 5-9 and a suspended solids value between 80-100mg/l is considered acceptable for discharge. Discharging to a location on land will be planned where possible and will be the preferred option over discharging to the marine environment. Authorisation will be sought from SEPA to permit discharge of wastewater as required on a scheme-by-scheme basis and no discharges will take place until the appropriate authorisation is secured.

The invasive non-native species slipper limpet, chain tunicate, and orange ripple bryozoan have been recorded in the Cromarty and Moray Firths ([National Marine Plan Interactive](#)); however, the standard and activity-specific working practices noted in Stage 1 and Appendix B also include provisions to reduce the risk of transporting invasive species during works following guidance from NS (Cook et al. 2014) and the GB NNSS, such as washing equipment or vehicles prior to moving between water bodies and utilising a '[Check Clean Dry](#)' methodology. These, in combination with standard containment measures, are expected to significantly reduce the risk of transporting invasive species within or around the Inner Moray Firth and wider marine environment. Therefore, the risk of indirect effects on the qualifying habitats of the SPA/Ramsar/SSSI as a result of pollution or spread of invasive species during proposed works at A9 Kessock Bridge is considered to be low.

Cumulative and in-combination effects – all features

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Although the proposed activities would be highly localised to the A9 Kessock Bridge and immediate vicinity, the timing of works over the next 10 years has not yet been confirmed. The proposed works in the 10-year programme also range from very minor reactive maintenance activities that could take one or two days to complete to larger planned schemes that could take several months to complete, and which may not take place for several more years. Consequently, it is not practicable at this time to search for other plans or projects that may have cumulative or in-combination effects until individual maintenance schemes are designed and submitted for environmental assessment. As noted above, a search will be undertaken for other plans and projects that could have cumulative or in-combination effects in the vicinity of the proposed maintenance works on a case-by-case basis once individual maintenance schemes are designed and submitted for environmental assessment. If there is potential for these effects, additional consultation will be carried out with NS. However, considering the nature and scale of each of the maintenance activities and the distance between the Cromarty Firth SPA/Ramsar/SSSI and the A9 Kessock Bridge, there is likely to be extremely 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 of most proposed maintenance activities. Although some minor cyclic maintenance could be carried out during or close to the timing of a larger scheme, any planned larger schemes at A9 Kessock Bridge or other major trunk road bridges (e.g., A9 Cromarty Bridge, A9 Dornoch Bridge) typically would not be carried out concurrently or within the same financial year due to budget limitations and required lead-in time for tendering and mobilisation, which reduces the risk of significant cumulative or in-combination effects due to disturbance on and around the bridge. 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 construction noise and activities is also limited.

Overall, due to the nature and scale of the proposed activities, the distance between the area of works and the designated sites, and the limited potential for overlap of any activities during the 10-year programme, it is highly unlikely that any of the proposed maintenance activities would result in significant cumulative or in-combination effects on the qualifying features of the Cromarty Firth SPA/Ramsar and component SSSI.

Conclusion:

Taking into account the considerable distance between the area of works at A9 Kessock Bridge and the Cromarty Firth SPA/Ramsar alongside the good working practices for pollution control as noted in Stage 1 and Appendix B, **no LSE, either alone or in combination with other projects, have been identified on any of the qualifying features of the Cromarty Firth SPA or Cromarty Firth Ramsar as a result of the proposed activities and all conservation objectives for these features will be met. These features are not considered further.**

Similarly, no significant negative impacts have been identified on any of the qualifying features of the Cromarty Firth SSSI as a result of the proposed works and these features are not considered further.

5. River Moriston SAC

The River Moriston SAC covers the River Moriston from Loch Cluanie (downstream of the hydroelectric dam) to Loch Ness. It is designated primarily for the Annex II species FWPM and also for Atlantic salmon. The SAC is located approximately 41.68km (via connected waterbodies) southwest of A9 Kessock Bridge. It has connectivity to the Beaully Firth via Loch Ness and the River Ness.

Assessment against the conservation objectives for all qualifying features (Atlantic salmon, FWPM)

As an anadromous species, Atlantic salmon are highly mobile, migrating from a freshwater environment to the marine environment for part of their life cycle before returning to their native freshwater river to spawn. Atlantic salmon associated with the River Moriston SAC travel via Loch Ness and the River Ness to reach the sea. The River Ness enters the Beaully Firth approximately 500m southwest of A9 Kessock Bridge; therefore, any salmon migrating to or from the River Moriston SAC are likely to pass under the bridge. Atlantic salmon are sensitive to a range of pressures in both the freshwater and marine environments, including barriers to fish passage, lack of sediment/gravel transport due to dams, marine mortality, climate change, INNS, agriculture, grazing, water management, water quality, and forestry operations (NS 2019).

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FWPM are long-lived freshwater molluscs that require gravel beds rivers with good water quality to survive. Atlantic salmon act as a host species for larval FWPM, which attach to the gills of young salmon from mid- to late-summer until the following spring. Larval mussels must land in good-quality habitat (sandy or gravelly substrate) when they detach from the salmon to successfully grow to adulthood. FWPM are sensitive to a variety of factors, including changes in water quality (pollution), hydrological alterations, habitat degradation, illegal pearl fishing, and availability of host species (NS 2019).

The SAC is located over 40km upstream from the area of works at A9 Kessock Bridge. Therefore, none of the pressures related to the freshwater environment of the River Moriston are likely to be affected by the proposed works. No in-water works are planned. However, some works would require the use of vessels or boats and all works have potential to result in pollution of the marine environment. As the migratory route of Atlantic salmon associated with the SAC passes under the Kessock Bridge, there is a risk that the proposed works could contribute to some of the above pressures related to marine mortality or water quality, which could in turn affect the survival and distribution of Atlantic salmon within the SAC. Furthermore, any risks to salmon are also likely to affect FWPM within the SAC, which depend on Atlantic salmon as a host species. Therefore, **LSE on Atlantic salmon and FWPM as a result of proposed works cannot be ruled out, and these features are considered further in Stage 4.**

6. Dornoch Firth and Morrich More SAC

The Dornoch Firth and Morrich More SAC covers the Dornoch Firth from Bonar Bridge in the west to just west of Portmahomack in the east. The designated area includes the waterbody up to the mean high water springs (MHWS) line and some adjacent coastal areas both north and south of Dornoch Firth.

The SAC is designated primarily for its Annex I habitats, including priority dune features. The SAC is also designated for harbour seal and otter.

The A9 Kessock Bridge is located approximately 59.0km south of the SAC at the nearest point via connected waterbodies.

Assessment against the conservation objectives for all qualifying features (habitats, otter, harbour seal)

The SAC supports a range of non-mobile marine and coastal habitats within Dornoch Firth. Due to the very large distance between the area of works and the SAC, there is no connectivity between the qualifying habitats within the SAC and the area of works at A9 Kessock Bridge. Therefore, there is no risk that proposed works at the bridge will result in LSE on the qualifying habitat features of Dornoch Firth and Morrich More SAC and these features are not considered further.

Similarly, although otters associated with the SAC are mobile and may use nearby coastal areas, it is unlikely that otters using the Dornoch Firth area will travel as far as the Inner Moray Firth to forage or breed. Therefore, connectivity between the otter population in the Dornoch Firth and the area of works at A9 Kessock Bridge is highly limited, and the risk of proposed works resulting in LSE on otters within Dornoch Firth and Morrich More SAC is considered to be negligible. This feature is not considered further in this assessment.

Harbour seals associated with the SAC are highly mobile and may be present within proximity of the A9 Kessock Bridge, especially as there is a designated seal haul-out site in the Beaully Firth approximately 2.5km west of the bridge. Therefore, the risk of direct effects (e.g., mortality, habitat loss) and indirect effects (pollution of supporting habitats, disturbance) on harbour seal as a result of proposed works are considered below.

Harbour seals can be sensitive to four main pressures that can affect their survival and distribution across the site (NS 2025a), including:

- Disturbance when hauled out.
- Entanglement in fishing gear.
- Disturbance from underwater noise.
- Contaminants (e.g., through effects on water quality and bioaccumulation of contaminants in prey species).

The proposed works at A9 Kessock Bridge do not entail any fishing. However, some works would require the use of vessels which could result in disturbance to harbour seals using the nearby haul-out site and create underwater

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noise. All works have potential to result in pollution of the marine environment, which may affect harbour seals and/or their prey species as they are highly mobile and may use areas near A9 Kessock Bridge. Consequently, the proposed works could contribute to some of the above pressures, which could in turn affect the survival and distribution of harbour seals within the SAC. Therefore, **LSE on harbour seals as a result of proposed works cannot be ruled out, and this feature is considered further in Stage 4.**

Cumulative and in-combination effects – qualifying habitats and otter

Although the proposed activities would be highly localised to the A9 Kessock Bridge and immediate vicinity, the timing of works over the next 10 years has not yet been confirmed. The proposed works in the 10-year programme also range from very minor reactive maintenance activities that could take one or two days to complete to larger planned schemes that could take several months to complete, and which may not take place for several more years. Consequently, it is not practicable at this time to search for other plans or projects that may have cumulative or in-combination effects until individual maintenance schemes are designed and submitted for environmental assessment. As noted above, a search will be undertaken for other plans and projects that could have cumulative or in-combination effects in the vicinity of the proposed maintenance works on a case-by-case basis once individual maintenance schemes are designed and submitted for environmental assessment. If there is potential for these effects, additional consultation will be carried out with NS. However, considering the nature and scale of each of the maintenance activities and the distance between the Dornoch Firth and Morrich More SAC and the A9 Kessock Bridge, there is likely to be extremely 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 of most proposed maintenance activities. Although some minor cyclic maintenance could be carried out during or close to the timing of a larger scheme, any planned larger schemes at A9 Kessock Bridge or other major trunk road bridges (e.g., A9 Cromarty Bridge, A9 Dornoch Bridge) typically would not be carried out concurrently or within the same financial year due to budget limitations and required lead-in time for tendering and mobilisation, which reduces the risk of significant cumulative or in-combination effects due to disturbance on and around the bridge. 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 construction noise and activities is also limited.

Overall, due to the nature and scale of the proposed activities, the distance between the area of works and the SAC, and the limited potential for overlap of any activities during the 10-year programme, it is highly unlikely that any of the proposed maintenance activities would result in significant cumulative or in-combination effects on the qualifying habitats or otters within the Dornoch Firth and Morrich More SAC.

An assessment of cumulative and in-combination effects on harbour seal is included in Stage 4.

Conclusion:

Taking into account the considerable distance between the area of works at A9 Kessock Bridge and the Dornoch Firth and Morrich More SAC alongside the good working practices for pollution control as noted in Stage 1 and Appendix B, **no LSE, either alone or in combination with other projects, are expected on the qualifying habitats or otters within the Dornoch Firth and Morich More SAC as a result of the proposed activities and all conservation objectives for these features will be met. These features are not considered further.**

Due to the high mobility of harbour seals and nature of some of the proposed works, LSE on harbour seals cannot be ruled out at this stage 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 concluded that the proposed 10-year programme of works at A9 Kessock Bridge **will not result in LSE on the following qualifying features:**

- Inner Moray Firth Ramsar
 - Intertidal mudflats and sandflats
 - Saltmarsh
 - Sand dunes
 - Shingle
- Cromarty Firth SPA
 - Breeding populations of the following bird species:
 - Common tern
 - Osprey
 - Non-breeding (overwintering) populations of the following bird species:
 - Bar-tailed godwit
 - Curlew
 - Dunlin
 - Greylag goose
 - Knot
 - Oystercatcher
 - Pintail
 - Red-breasted merganser
 - Redshank
 - Scaup
 - Whooper swan
 - Wigeon
 - Waterfowl assemblage

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- Cromarty Firth Ramsar
 - All of the above bird species listed under Cromarty Firth SPA
 - Estuarine alder woodland
 - Intertidal mudflats and sandflats
 - Open water transition fen
 - Saltmarsh
- Moray Firth SAC
 - Subtidal sandbanks
- Dornoch Firth and Morrich More SAC
 - Atlantic salt meadows
 - Coastal dune heathland
 - Dune grassland
 - Dunes with juniper thickets
 - Estuaries
 - Glasswort and other annuals colonising mud and sand
 - Humid dune slacks
 - Intertidal mudflats and sandflats
 - Lime-deficient dune heathland with crowberry
 - Reefs
 - Shifting dunes
 - Shifting dunes with marram
 - Subtidal sandbanks
 - Otter

The assessment in Stage 3 **could not rule out LSE on the following qualifying features** as a result of proposed works at A9 Kessock Bridge. These features are considered further below and have been grouped where possible for brevity. As the Inner Moray Firth SPA and Ramsar overlap and are designated for the same bird species, these sites have been grouped into one assessment for brevity as the potential effects of works will be the same.

- Moray Firth SAC
 - Bottlenose dolphins
 - Subtidal sandbanks
- Moray Firth SPA
 - Non-breeding (overwintering) populations of the following bird species:
 - Common scoter
 - Eider
 - Goldeneye
 - Great northern diver
 - Long-tailed duck
 - Red-breasted merganser
 - Red-throated diver
 - Scaup
 - Shag
 - Slavonian grebe
 - Velvet scoter
 - Breeding populations of shag
- Inner Moray Firth SPA
 - Breeding populations of the following bird species:
 - Common tern
 - Osprey
 - Non-breeding (overwintering) populations of the following bird species:

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- Bar-tailed godwit
- Cormorant
- Curlew
- Goldeneye
- Goosander
- Greylag goose
- Oystercatcher
- Red-breasted merganser
- Redshank
- Scaup
- Teal
- Wigeon
- Waterfowl assemblage
- Inner Moray Firth Ramsar
 - All of the above bird species listed under Inner Moray Firth SPA
- River Moriston SAC
 - Atlantic salmon
 - FWPM
- Dornoch Firth and Morrich More SAC
 - Harbour seal

1. Moray Firth SAC

Bottlenose dolphin

As noted above, the Moray Firth SAC is designated for bottlenose dolphin and is spanned by A9 Kessock Bridge at the narrow point between Inverness and North Kessock where the Moray Firth joins the Beaully.

Although the proposed works at A9 Kessock Bridge will not include fishing or use of nets (which could entangle dolphins), some works will require the use of vessels and all works have potential to result in pollution of the marine environment. Therefore, there is a risk of direct impacts on dolphins due to collision with construction vessels and a risk of indirect impacts on dolphins due to disturbance (e.g., underwater noise, loss of foraging habitat), and pollution.

Risk of collision

The A9 Kessock Bridge spans the Moray Firth SAC; therefore, works and/or access will take place within or adjacent to the SAC. All proposed works will be highly localised to the A9 Kessock Bridge and immediate surroundings. Small access boats and barges will be required for some of these works, although it is not anticipated that equipment such as netting or lines that could present a higher risk of entanglement to dolphins will be required. The majority of proposed schemes and cyclic maintenance works will take place on the bridge deck, which is situated approximately 29.2m above MHWS (highest tide level of the water below) at the central span. Even the schemes and cyclic maintenance works that will require works or access below the bridge deck will be suspended fairly high above the water and will utilise appropriate containment methods (e.g., encapsulation) to prevent loss of equipment or materials into the marine environment. Therefore, the risk of injury or mortality to dolphins is negligible for most proposed works.

Only a small number of proposed works (e.g., structural health monitoring, ropes and ladders, minor concrete repairs, inspections and surveys) may require in-water access using boats or barges, which carry the highest risk of direct impacts to dolphins (e.g., via entanglement with equipment and/or collisions with vessels). Even for works that will require in-water access, dolphin survey results during site condition monitoring of the Moray Firth SAC in 2014-2016 suggest that the risk of encountering dolphins near the A9 Kessock Bridge is low (Cheney et al. 2018, Hague et al. 2020). During photographic surveys completed in the Inner Moray Firth area between May-September from 2014 to 2016, only five survey trips resulted in encounters with dolphins between the A9 Kessock Bridge and Chanonry Point, and three of these encounters occurred between Munloch Bay and Chanonry Point, approximately 5-11km from the bridge (Cheney et al. 2018). The majority of encounters occurred between Chanonry Point and the mouth of the Cromarty Firth. Passive acoustic monitoring was also undertaken at Chanonry Point between 2011-2016 which

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showed a peak in the number of hours dolphins were detected per day during May-August (Cheney et al. 2018). Although passive monitoring showed a peak in the percentage of days that dolphins were detected during the summer months (detected on 96.4% of days on average between May to September), dolphins were detected on 66.3% of days on average between December and April, which suggests that the Inner Moray Firth is used year-round by dolphins in the SAC (Cheney et al. 2018). The results of these site condition monitoring surveys suggest that bottlenose dolphins occur more frequently in areas northwest of A9 Kessock Bridge. However, it is still possible that dolphins may forage or commute in parts of the SAC closer to the bridge. Therefore, any boats or vessels required will launch from local points where possible to limit travel distances. The few schemes requiring access using boats or barges are expected to take between 1-3 months or less to complete. It is expected that any boats or vessels required will be stationed at the area of works (likely at bridge piers), only moving small distances as required, which will reduce the risk of collision with any dolphins in the area. Where the use of boats or other vessels is required to carry out works, all vessels operating during works will adhere to the general principles in the 'Scottish Marine Wildlife Watching Code' and 'A Guide to Best Practice for Watching Marine Wildlife' (NS 2016b, NS 2017), including the following measures:

- Vessels will not approach any marine wildlife.
- Vessels will maintain a safe distance (at least 50m, preferably more) from any marine wildlife passing through the area of works and/or access routes.
- Vessels will avoid sudden unpredictable changes in speed, direction, and engine noise.
- Vessels will not cut off an animal or group of animals by moving across their path and will not approach them from behind.

With these measures in place, and as bottlenose dolphins 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 bottlenose dolphins within the SAC is considered to be low.

Risk of disturbance

No in-water works are currently planned on A9 Kessock Bridge. Most of the proposed works do not entail in-water access and therefore will not result in significant underwater noise that could cause disturbance to bottlenose dolphins. A few works (structural health monitoring, ropes and ladders, minor concrete repairs, inspections and surveys) will likely produce some underwater noise due to the use of barges or other boats, but none of these works are anticipated to entail activities that would create impulsive noise (e.g., pile driving, explosions) that can be detrimental to hearing in dolphins (Southall et al. 2019).

Dolphins associated with the Moray Firth SAC fall into the coastal ecotype population, which occurs in inshore waters over the continental shelf in areas with high boat traffic levels (New et al. 2013, Hague et al. 2020). These dolphins are likely to be habituated to existing levels of noise and activity due to boat traffic within the Inner Moray Firth, Beaulieu Firth, and wider Moray Firth. The Port of Inverness is located just west of A9 Kessock Bridge and is in a corridor of high-density vessel traffic ([Marine Scotland - National Marine Plan Interactive](#)). The few proposed activities at A9 Kessock Bridge that require the use of boats or vessels are therefore unlikely to result in significantly higher levels of noise than baseline levels in this high-traffic area. New et al. (2013) studied the effects of anthropogenic disturbance on the Moray Firth population of bottlenose dolphins by modelling and comparing the effects of current boat traffic levels at the time to a six-fold increase in boat traffic around Nigg at the mouth of the Cromarty Firth. The study concluded that the simulated increase in vessel traffic did not result in any changes to the size of dolphin groups, their spatial distribution, or activity budgets within the Moray Firth, as the dolphins could avoid more heavily trafficked areas and utilise alternative undisturbed areas of the Firth (New et al. 2013). Pirodda et al. (2015) also simulated the effects of increased boat traffic and dredging activities on dolphins in the Moray Firth and found no significant effect of these activities on calf survival. The results of these studies suggest 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. As the potential disturbance sources from proposed works requiring in-water access at A9 Kessock Bridge are similar to or less than those investigated by these studies, any short-term effects of disturbance on dolphins in the Moray Firth are likewise not expected to have a significant detrimental effect on the bottlenose dolphin population within the Moray Firth SAC.

No in-water works are currently planned and none of the proposed works at A9 Kessock Bridge involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Inner Moray Firth or Beaulieu Firth. Therefore, the proposed activities will not result in direct loss of habitat for bottlenose dolphin or their prey

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species within the SAC. Works requiring in-water access may temporarily reduce available foraging areas, but dolphins are highly mobile and would have abundant habitat of good foraging quality available in the wider Moray Firth (New et al. 2013, Pirodda et al. 2015). The proposed works will be highly localised to the bridge and will adhere to standard good practice for pollution prevention. Additional measures (e.g., encapsulation) will also be employed for certain activities such as painting, grit-blasting, and hydro-demolition to ensure containment of all works. Therefore, no significant effects on fish within the Moray Firth SAC (i.e., prey for bottlenose dolphins) have been identified.

Upon detailed review, the works are considered to carry limited potential to result in significant underwater noise or impacts on foraging habitat for bottlenose dolphins within the Moray Firth SAC. In addition, considering that bottlenose dolphins are highly mobile and capable of moving to undisturbed areas of the SAC, the risk of significant disturbance on bottlenose dolphins as a result of the proposed works is considered to be low.

Risk of pollution

Dolphins and their prey species are highly mobile. Therefore, there is potential for indirect effects on dolphins, their supporting habitats, and prey species as a result of pollution from construction activities or from discharge of water used in hydro-demolition. However, the standard working practices listed in Stage 1 and Appendix B include robust containment measures to prevent pollution events for all works. Furthermore, as noted in Stage 1, full encapsulation will be in place for certain activities that pose a higher risk of pollution (e.g., grit-blasting, painting, hydro-demolition) to ensure that all debris, materials, and wastes are contained and removed from site. Water used in hydro-demolition will be captured, appropriately treated to reduce pH and suspended solids, and removed or (where required) discharged under an appropriate authorisation from SEPA. The volume and rate of discharge will be agreed with SEPA and will determine the level of authorisation required to permit discharge. Treatment of water prior to discharge will be carried out with appropriate values for pH and suspended solids stipulated in the SEMP. Typically, a pH value between 5-9 and a suspended solids value between 80-100mg/l is considered acceptable for discharge. Discharging to a location on land will be planned where possible and will be the preferred option over discharging to the marine environment. Authorisation will be sought from SEPA to permit discharge of wastewater as required on a scheme-by-scheme basis and no discharges will take place until the appropriate authorisation is secured.

None of the proposed works involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Moray Firth SAC. The proposed works in the 10-year programme will be highly localised to the bridge and will adhere to standard good practice for pollution prevention; therefore, no significant effects on fish within the Moray Firth SAC (i.e., prey for bottlenose dolphins) have been identified.

With these measures in place during works, the risk of indirect effects on bottlenose dolphins and their supporting habitats and prey species as a result of pollution is limited.

Subtidal sandbanks

Pressures that can affect subtidal sandbanks include physical disturbance, INNS, and changes in water quality (NS 2025b). The risk of direct effects (e.g., habitat loss, mortality of typical species) due to physical disturbance and indirect effects due to pollution and spread of INNS on the qualifying habitat as a result of proposed works at A9 Kessock Bridge are considered below.

Risk of direct effects (physical disturbance)

As noted, the A9 Kessock Bridge spans the Moray Firth SAC. However, no in-water works are currently planned and only a few works will require the use of boats or barges to provide access to the piers. Therefore, the risk of physical damage to subtidal sandbanks is negligible for most proposed activities.

Works requiring access via boats or barges will be highly localised to the A9 Kessock Bridge (e.g., piers) and its immediate vicinity. The nearest areas of subtidal sandbank habitat are located approximately 140m east of the northern end of the bridge, with other areas present approximately 1.03km east of the bridge (Figure 2). Any boats used for works will launch from the Port of Inverness, which is immediately west of the bridge. No areas of subtidal sandbanks are present between there and the bridge. Therefore, it is highly unlikely that the use of boats or barges will result in any direct effects (e.g., habitat loss, mortality of typical species due to construction activities or vehicles) on subtidal sandbank habitat in the vicinity of A9 Kessock Bridge.

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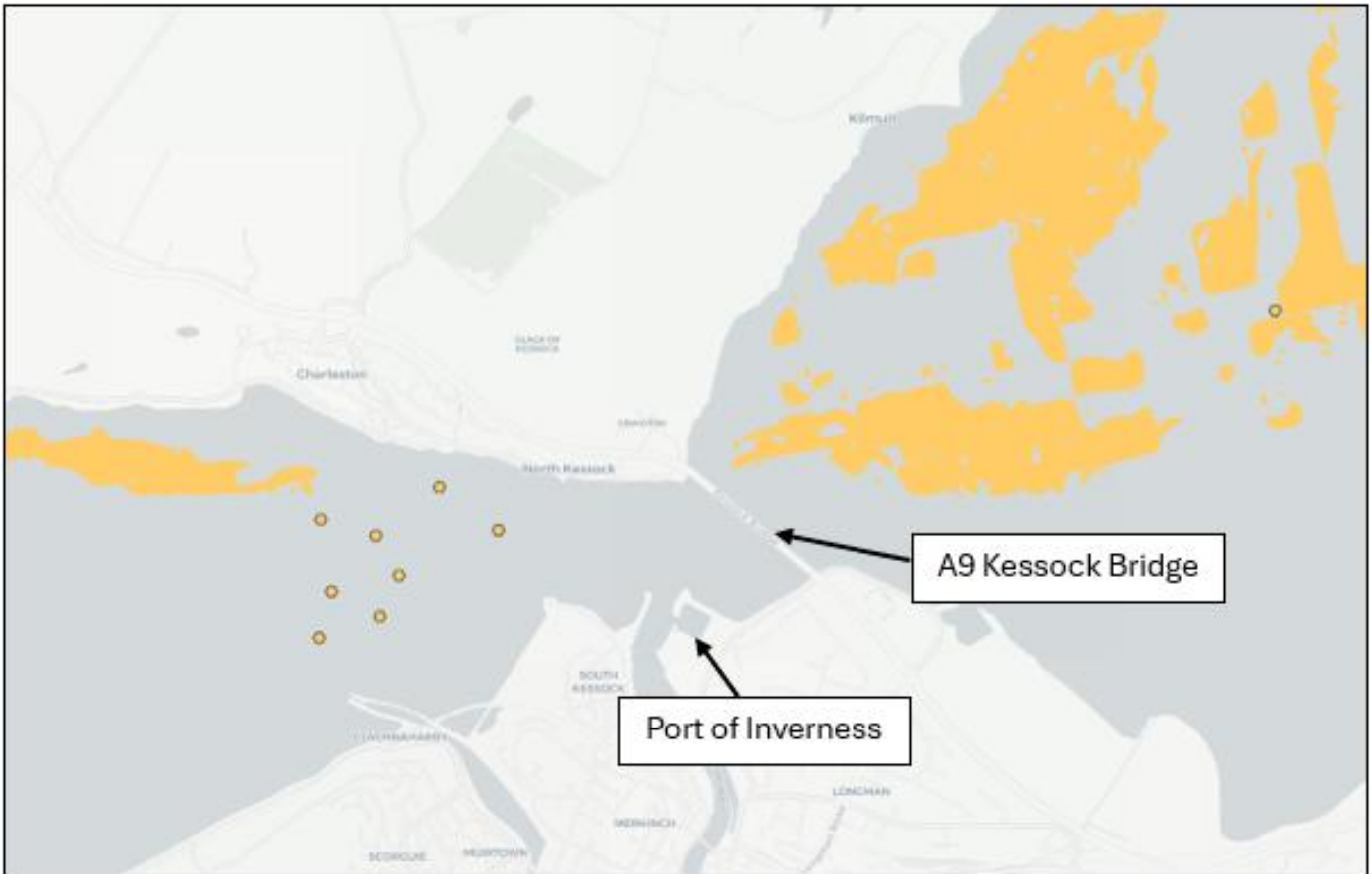


Figure 2. Location of subtidal sandbank habitat (yellow areas and dots) in relation to A9 Kessock Bridge. Source: [Marine Scotland - National Marine Plan Interactive](#)

Risk of indirect effects (pollution, INNS)

For all of the proposed maintenance activities, there is potential for indirect effects on subtidal sandbanks as a result of pollution from construction activities or from discharge of water used in hydro-demolition. However, the standard working practices listed in Stage 1 and Appendix B include robust containment measures to prevent pollution events for all works. Furthermore, as noted in Stage 1, full encapsulation will be in place for certain activities that pose a higher risk of pollution (e.g., grit-blasting, painting, hydro-demolition) to ensure that all debris, materials, and wastes are contained and removed from site. Water used in hydro-demolition will be captured, appropriately treated to reduce pH and suspended solids, and removed or (where required) discharged under an appropriate authorisation from SEPA. The volume and rate of discharge will be agreed with SEPA and will determine the level of authorisation required to permit discharge. Treatment of water prior to discharge will be carried out with appropriate values for pH and suspended solids stipulated in the SEMP. Typically, a pH value between 5-9 and a suspended solids value between 80-100mg/l is considered acceptable for discharge. Discharging to a location on land will be planned where possible and will be the preferred option over discharging to the marine environment. Authorisation will be sought from SEPA to permit discharge of wastewater as required on a scheme-by-scheme basis and no discharges will take place until the appropriate authorisation is secured.

None of the works involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Inner Moray Firth / Beaully Firth and therefore will not affect any water management activities within the Moray Firth SAC. The invasive non-native species slipper limpet, chain tunicate, and orange ripple bryozoan have been recorded in the Cromarty and Moray Firths ([National Marine Plan Interactive](#)); however, the standard and activity-specific working practices noted in Stage 1 and Appendix B also include provisions to reduce the risk of transporting invasive species during works following guidance from NS (Cook et al. 2014) and the GB NNSS, such as washing equipment or vehicles prior to moving between water bodies and utilising a 'Check Clean Dry' methodology. These, in combination with standard containment measures, are expected to significantly reduce the risk of transporting invasive species within or around the Inner Moray Firth and wider marine environment. Therefore,

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the risk of indirect effects on subtidal sandbanks habitat and its typical species within the SAC as a result of pollution or spread of invasive species during proposed works at A9 Kessock Bridge is considered to be low.

Cumulative and in-combination effects – bottlenose dolphin and subtidal sandbanks

The proposed activities will be highly localised to the A9 Kessock Bridge and immediate vicinity and indicative timing of works over the next 10 years has been estimated (refer to Table 1 and the supporting document ‘**Supporting Information - A9 Kessock 10-Year Programme**’). However, these dates are subject to change. The proposed works in the 10-year programme also range from very minor reactive maintenance activities that could take one or two days to complete to larger planned schemes that could take several months to complete, and which may not take place for several more years. Consequently, it is not practicable at this time to search for other plans or projects that may have cumulative or in-combination effects until individual maintenance schemes are designed and submitted for environmental assessment. As noted above, a search will be undertaken for other plans and projects that could have cumulative or in-combination effects in the vicinity of the proposed maintenance works on a case-by-case basis once individual maintenance schemes are designed and submitted for environmental assessment. If there is potential for these effects, additional consultation will be carried out with NS. However, considering the nature and scale of each of the maintenance activities and the high levels of anthropogenic activity in the vicinity of the bridge, there is likely to be limited potential for significant cumulative or in-combination effects on bottlenose dolphin or subtidal sandbank habitat due to other plans or projects.

There is some potential for cumulative or in-combination effects resulting from multiple activities carried out by BEAR due to the amount of maintenance works required on A9 Kessock Bridge over the next 10 years. However, all works will be highly localised to the bridge, which spans a very small part of the Moray Firth SAC and is located in an area of high anthropogenic activity, including marine activity associated with the Port of Inverness. Most of the works are located on or immediately below the bridge deck, which is elevated above the water. Additionally, only a small number of works will require access boats or barges. Therefore, the risk of significant cumulative noise impacts on dolphins is likely to be low, as is the risk of physical disturbance to subtidal sandbank habitat. Although some minor cyclic maintenance could be carried out during or close to the timing of a larger scheme, any planned larger schemes typically will be spaced out across the 10-year programme due to budget limitations and required lead-in time for tendering and mobilisation, which reduces the risk of significant cumulative or in-combination effects due to disturbance on and around the bridge. 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, noise disturbance in localised areas due to construction noise and activities is also limited.

Overall, due to the nature and scale of the proposed activities, the location of the bridge within an area of high anthropogenic activity, its elevated position above the marine environment, minor use of boats and barges, and the limited potential for overlap of activities during the 10-year programme, it is unlikely that any of the proposed works would result in significant cumulative or in-combination effects on the qualifying features bottlenose dolphin or subtidal sandbanks within the Moray Firth SAC.

Conclusion

Upon detailed review, the majority of proposed works at A9 Kessock Bridge over the next 10 years have limited potential to result in LSE on bottlenose dolphins or subtidal sandbanks within the SAC. A few activities carry a higher risk of impacting these features due to collisions with vessels, noise disturbance, or physical disturbance due to boat use. Additionally, 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 the Moray Firth SAC, and all conservation objectives for bottlenose dolphins and subtidal sandbanks within the SAC will be met.**

2. Moray Firth SPA

As noted above, Moray Firth SPA is designated for several species of non-breeding birds as well as breeding populations of shag which are highly and mobile and are known to use the areas near the A9 Kessock Bridge. The Moray Firth SPA is spanned by the A9 Kessock Bridge.

Overwintering birds and breeding shag

The below assessment considers how the proposed works may contribute to known pressures on the qualifying bird species of the SPA. Pressures have been grouped into three main risks for assessment, including risk of mortality

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(e.g., due to collisions, entanglement with equipment, loss of habitat), risk of disturbance, and risk of pollution (including effects of changes to water quality and food resources).

Risk of mortality

All of the proposed works at A9 Kessock Bridge will be highly localised to the immediate vicinity of the bridge. No in-water works are currently planned and the few works requiring access via boats or barges will be highly localised to the bridge piers. Any boats required will launch from the Port of Inverness, which is a short distance east of the bridge. This area of the Inner Moray Firth / Beaully Firth is highly modified and experiences high levels of marine traffic. Therefore, there is highly limited habitat in these areas for the qualifying bird species, and it is not expected that works will result in the loss of any supporting habitat for overwintering birds or breeding shag within the Moray Firth SPA.

Most proposed works will be focused on the bridge deck or areas below the deck. A few schemes will take place on the pylons or cables and a few would require in-water access to the piers. Overwintering birds and breeding shag in the area will likely be accustomed to the presence of the bridge and movement of vehicles on the bridge. It is likely that they already avoid the bridge in their usual flight paths for commuting and foraging within the Inner Moray Firth / Beaully Firth. BEAR Scotland collects and records reports of roadkill incidents but does not hold any roadkill records of these species in the database, which includes records from 2013-2024. Installation of pigeon deterrents will include the use of bird spikes, gel pods, and steel mesh rather than netting, which will reduce the risk of entanglement for any of the qualifying bird species that may roost on A9 Kessock Bridge. Although some of the proposed works will entail the use of scaffolding, barges with machinery, or MEWPs, none of these would require installation of structures significantly higher than the bridge itself. In addition, all works and temporary access arrangements would be highly localised to the area of works on the bridge (e.g., underside of bridge deck, bridge piers, pylons, etc.) and are not expected to cause blockages to airspace above or below the bridge components, which reduces the risk that birds would collide with any machinery or equipment on the bridge. Where debris netting is required, it will be limited to the minimum amount required and will be installed as close to the working area as possible to reduce the risk of entanglement for qualifying bird species. With these measures in place, the risk of mortality or injury to overwintering birds or breeding shag as a result of proposed works is considered to be low.

Winter foraging habitat for the qualifying bird species (and breeding habitat for shag) includes sheltered coastal habitat and inshore waters for most species. Several of the qualifying species gather in large flocks for roosting and foraging over the winter and may remain at sea most of the time. Great northern divers can sometimes forage in harbours near human activity, but most of the other species are more likely to spend time away from these areas (Goodship and Furness 2022). As most of the qualifying species are wildfowl that tend to remain on the water, it is unlikely that these species would be found roosting on A9 Kessock Bridge. Although winter foraging and roosting habitat for the qualifying species is likely present along the coast of the Inner Moray Firth / Beaully Firth, the bridge spans only a very small area of the Moray Firth SPA. No in-water works are currently planned and only few schemes will require access via boats from the Port of Inverness. All works will be highly localised to the bridge and none of the proposed works require works or access on shorelines or intertidal areas along the coast. Therefore, it is not expected that any of the proposed works will result in direct loss of overwintering habitat for the qualifying species associated with the Moray Firth SPA.

Risk of disturbance

The qualifying non-breeding species are considered to have a medium to high sensitivity to disturbance (Goodship and Furness 2022). These species are particularly sensitive to disturbance during foraging and/or roosting periods, as significant and/or repeated disturbance can result in increased energy expenditures and loss of condition, which can subsequently result in mortality. NS recommends the following disturbance buffers during the non-breeding season for the qualifying overwintering species (Goodship and Furness 2022):

- Eider, non-breeding = 200-500m
- Goldeneye, non-breeding = 150-800m
- Great northern diver, non-breeding = 100-350m
- Red-throated diver, non-breeding = 1000m
- Scaup, non-breeding = 150-450m
- Slavonian grebe, non-breeding = 150-350m

No data is available for the rest of the qualifying bird species within the Moray Firth SPA (common scoter, long-tailed duck, red-breasted merganser, velvet scoter (all non-breeding), and shag (breeding and non-breeding)); however, it

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is assumed that these species are less sensitive to disturbance than red-throated divers, which are known to be highly sensitive to disturbance (Goodship and Furness 2022) and have the largest non-breeding disturbance buffer of the above-listed qualifying species. Therefore, disturbance buffers under 1000m are assumed for the species listed above for which no specific data is available.

Various works (both schemes and cyclic maintenance) are expected to be completed during the overwintering period (October to March) and/or the shag breeding season (February to September) over the next ten years. The qualifying non-breeding species associated with the Moray Firth SPA are highly mobile and may use areas in proximity to A9 Kessock Bridge. Therefore, there is a risk that works on A9 Kessock Bridge could result in disturbance to foraging or roosting birds associated with the SPA during the overwintering period (or shag breeding season) due to increased presence of vehicles, plant, personnel, and lighting on the bridge during works.

Most of the qualifying bird species forage at sea by diving for fish and invertebrates such as molluscs and crustaceans (Goodship and Furness 2022). These species tend to gather in large flocks over the winter and spend most of their time at sea or in sheltered inshore waters. Shags are found in coastal areas year-round. Great northern divers can sometimes forage in harbours near human activity, but most of the other species are more likely to spend time away from these areas (Goodship and Furness 2022). Most of the habitat present within 1km west of A9 Kessock Bridge is unlikely to be suitable as roosting habitat for the qualifying bird species (or breeding habitat for shag). Shoreline areas west of the bridge are highly modified, support urban settlements, and experience high levels of human activity, both on shore and in the water. Areas within 1km east and north of the bridge are less developed and may provide more suitable coastal habitat, although the shoreline north of the bridge is known to experience a high level of use by dog walkers and pedestrians.

Although most of the habitat present within disturbance distances for overwintering birds and breeding shag is likely sub-optimal, these species may still be present within proximity of the bridge. Most of the proposed works will take place on or below the A9 Kessock Bridge deck where there is already an existing level of activity, noise, and light from traffic throughout the year and at all hours. Research on some species (eider, great northern diver, Slavonian grebe) has suggested that they may tolerate or become habituated to some human disturbance (Gittings et al. 2015, Upton et al. 2018, Jackson 2018, Goodship and Furness 2022), and birds in the vicinity of A9 Kessock Bridge are likely to be accustomed to existing levels of traffic and activity on the bridge. Most of the proposed works (i.e., cyclic maintenance activities and smaller schemes) are unlikely to significantly differ from baseline levels of traffic noise, light, and activity on the bridge. Although an increase in baseline noise level is expected during works for some larger schemes, any increase in noise will be temporary, intermittent, of short duration, and localised to the trunk road. In addition, where higher-risk activities such as grit-blasting, painting, and hydro-demolition are required, full encapsulation of working areas will be installed to ensure containment of materials. Encapsulation will provide a barrier to reduce visual and acoustic disturbance. Most works that will require access or lighting outside of the carriageway (e.g., below the deck) will still be located close to the bridge deck and existing site compound areas below each end of the bridge and are unlikely to significantly affect overwintering birds or breeding shag in the area. The few schemes that will require in-water access (e.g., to the piers) may have a higher risk of resulting in disturbance to nearby roosting or foraging birds, which can be sensitive to pedestrians and boat use (Goodship and Furness 2022) and as human activity in these areas is less common than activity near the bridge deck. However, the bridge spans a busy corridor for marine traffic, so the use of boats in this area is not unusual and birds in the area are likely to be accustomed to regular boat traffic. Additionally, there is ample alternative habitat for roosting and foraging birds (and breeding shag) within the SPA and wider Moray Firth area that will remain available outside of the working area and of the disturbance buffers for these species.

Working hours are dependent on several factors (e.g., network restrictions on traffic management) and may entail daytime works, overnight works, or a combination of both. Certain activities may also require 24-hour access and could require short periods of extended working hours (e.g., over weekends to reduce impacts of road closures on vehicular travellers). However, as noted, the majority of works will be focused near the bridge deck where there are existing levels of noise, activity, and lighting at all hours, so qualifying species that may be present along the coast during roosting or foraging periods or the shag breeding season are unlikely to be significantly affected by most works, regardless of the timing. Works requiring in-water access will likely need to consider tide times in their programming (e.g., works can only take place during low tide). There is a risk that foraging or roosting periods could be affected by these works, depending on scheme-specific programmes. However, these works will be highly localised, will take place in areas already subject to high levels of marine traffic, and will be of relatively short durations. In addition, there is ample alternative habitat for roosting and foraging birds and breeding shag within the

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SPA and wider Moray Firth area that will remain available outside of the working area and of the disturbance buffers for these species.

However, prior to larger schemes with longer durations that may commence or extend into the overwintering period and/or breeding season for shag, surveys will be programmed and undertaken to identify any areas of use by the qualifying bird species that could be affected by works. If any areas are identified, additional consultation would be carried out with NS to agree suitable mitigation measures. These may include seasonal constraints on working to avoid the overwintering period or shag breeding season, a requirement to avoid construction site compounds or other features within or near confirmed roost sites or breeding sites, and/or use of visual/acoustic barriers between working areas and roosting/foraging/breeding sites. In addition, the following measures will be in place to reduce the effects of disturbance on overwintering birds and breeding shag in the vicinity of the bridge:

- Pre-construction surveys will be carried out prior to larger schemes with longer durations to identify any evident roosting or foraging areas for overwintering birds or breeding sites for shag within disturbance buffers of works.
 - If any are identified, additional consultation will be carried out with NS to agree suitable mitigation measures to reduce the risk of disturbance to qualifying bird species, such as:
 - Seasonal constraints on works to avoid the overwintering period or shag breeding season.
 - Timing restrictions on works to reduce the risk of effects during the overwintering period or shag breeding season.
 - Use of visual and/or acoustic barriers within working areas or at site compound locations.
- The 'Birds' Toolbox Talk will be included in the SEMP and provided to all site staff prior to works commencing.
- Access to intertidal areas and mudflats in the Inner Moray Firth / Beaulie Firth will be avoided during cold weather when seven or more consecutive days of freezing conditions have been recorded, which can leave overwintering birds more vulnerable to disturbance.
- Any artificial lighting required during night works or periods of low light levels will be directed at the area of works as far as is safe and reasonably practicable. Light spillage will be reduced as much as possible (e.g., via use of shades).
- A daily cessation of noisy works (e.g., hydro-demolition) will be planned during construction to allow a quiet period each day.
- Plant, machinery and equipment fitted with effective silencers where available will be utilised for the works. Where fitted, and where permitted under Health and Safety requirements, white noise reversing alarms will be utilised during construction.
- Where possible, inherently quiet plant will be selected for construction works. Where appropriate, pumps and generators will be sound-reduced models with fitted, lined, and sealed acoustic covers.
- All plant will be operated in such a way that minimises noise emissions and be switched off when not in use.
- All ancillary plant such as generators will be positioned so as to cause minimum noise disturbance. Where deemed necessary, acoustic screens will be utilised.
- For larger schemes with longer durations, an Ecological Clerk of Works (ECoW) will attend site regularly during works to monitor sensitive ecological receptors (e.g., overwintering birds, breeding shag) and mitigation measures to reduce impacts.

There is a risk of disturbance to overwintering birds and/or breeding shag as a result of the proposed 10-year programme of works at A9 Kessock Bridge, particularly for certain activities that will require in-water access via boats. However, with the use of surveys and with the above measures in place to reduce the effects of noise, lighting, and presence of construction equipment and staff, the risk of significant disturbance to overwintering birds and breeding shag within the SPA is considered to be low.

Risk of pollution

For all of the proposed maintenance activities, there is potential for indirect effects on overwintering birds and/or breeding shag, their supporting habitats, and prey species as a result of pollution from construction activities or from discharge of water used in hydro-demolition. However, the standard working practices listed in Stage 1 and Appendix B include robust containment measures to prevent pollution events for all works. Furthermore, as noted in Stage 1, full encapsulation will be in place for certain activities that pose a higher risk of pollution (e.g., grit-blasting, painting, hydro-demolition) to ensure that all debris, materials, and wastes are contained and removed from site. Water used

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in hydro-demolition will be captured, appropriately treated to reduce pH and suspended solids, and removed or (where required) discharged under an appropriate authorisation from SEPA. The volume and rate of discharge will be agreed with SEPA and will determine the level of authorisation required to permit discharge. Treatment of water prior to discharge will be carried out with appropriate values for pH and suspended solids stipulated in the SEMP. Typically, a pH value between 5-9 and a suspended solids value between 80-100mg/l is considered acceptable for discharge. Discharging to a location on land will be planned where possible and will be the preferred option over discharging directly to the marine environment. Authorisation will be sought from SEPA to permit discharge of wastewater as required on a scheme-by-scheme basis as required and no discharges will take place until the appropriate authorisation is secured.

None of the proposed works involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Inner Moray Firth / Beaulay Firth. The proposed works in the 10-year programme will be highly localised and adhere to standard good practice for pollution prevention; therefore, no significant effects on fish, invertebrates, or vegetation within the Moray Firth SPA (i.e., food resources for qualifying birds) have been identified.

With these measures in place during works, the risk of indirect effects on overwintering birds and breeding shag and their supporting habitats and prey species as a result of pollution is limited.

Cumulative and in-combination effects – overwintering birds and breeding shag

The proposed activities will be highly localised to the A9 Kessock Bridge and immediate vicinity and indicative timing of works over the next 10 years has been estimated (refer to Table 1 and the supporting document ‘**Supporting Information - A9 Kessock 10-Year Programme**’). However, these dates are subject to change. The proposed works in the 10-year programme also range from very minor reactive maintenance activities that could take one or two days to complete to larger planned schemes that could take several months to complete, and which may not take place for several more years. Consequently, it is not practicable at this time to search for other plans or projects that may have cumulative or in-combination effects until individual maintenance schemes are designed and submitted for environmental assessment. As noted above, a search will be undertaken for other plans and projects that could have cumulative or in-combination effects in the vicinity of the proposed maintenance works on a case-by-case basis once individual maintenance schemes are designed and submitted for environmental assessment. If there is potential for these effects, additional consultation will be carried out with NS. However, considering the nature and scale of each of the maintenance activities and the high levels of anthropogenic activity in the vicinity of the bridge, there is likely to be limited potential for significant cumulative or in-combination effects on the qualifying bird species due to other plans or projects.

There is some potential for cumulative or in-combination effects resulting from multiple activities carried out by BEAR due to the amount of maintenance works required on A9 Kessock Bridge over the next 10 years. However, all works will be highly localised to the bridge, which spans a very small part of the Moray Firth SPA and is located in an area of high anthropogenic activity, including marine activity associated with the Port of Inverness. Most of the works are located on or immediately below the bridge deck, which is elevated above the water. Additionally, only a small number of works will require access boats or barges. Therefore, the risk of significant cumulative disturbance impacts on the qualifying bird species is likely to be low. Although some minor cyclic maintenance could be carried out during or close to the timing of a larger scheme, any planned larger schemes typically will be spaced out across the 10-year programme due to budget limitations and required lead-in time for tendering and mobilisation, which reduces the risk of significant cumulative or in-combination effects due to disturbance on and around the bridge. 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, noise disturbance in localised areas due to construction noise and activities is also limited.

Overall, due to the nature and scale of the proposed activities, the location of the bridge within an area of high anthropogenic activity, its elevated position above the marine environment, minor use of boats and barges, and the limited potential for overlap of activities during the 10-year programme, it is unlikely that any of the proposed works would result in significant cumulative or in-combination effects on the qualifying bird species within the Moray Firth SPA.

Conclusion

Upon detailed review, the majority of proposed works at A9 Kessock Bridge over the next 10 years have limited potential to affect supporting habitats of the qualifying bird species within the SPA. There is a risk that works could

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result in disturbance of the qualifying species or impacts due to pollution. **However, with the above measures in place alongside robust containment measures, these works are not expected to result in AESI for the Moray Firth SPA, and all conservation objectives the qualifying bird species within the SPA will be met.**

3. Inner Moray Firth SPA/Ramsar

Includes assessment of qualifying bird species within Beaully Firth SSSI, Munloch Bay SSSI, Longman and Castle Stuart Bays SSSI for completeness.

As noted above, Inner Moray Firth SPA/Ramsar are designated for several species of non-breeding birds as well as breeding populations of common tern and osprey. The A9 Kessock Bridge lies approximately 2.18km southeast of the SPA/Ramsar at its closest point, with the highly mobile nature of qualifying bird species providing potential ecological connectivity between these sites and the proposed area of works.

Breeding common terns and osprey

Osprey are known to regularly breed and forage within the SPA/Ramsar and breeding tern colonies are known to be present in the SPA. Due to the proximity of the bridge to these designated sites, the high mobility of these species, and a requirement to undertake certain schemes and cyclic maintenance activities during the breeding season for terns and osprey, there is a risk of works affecting breeding common terns and osprey both directly due to mortality and indirectly due to disturbance and pollution during construction.

Risk of mortality

All of the proposed works at A9 Kessock Bridge will be highly localised to the immediate vicinity of the bridge. No works will take place within the boundary of the Inner Moray Firth SPA/Ramsar; therefore, works will not result in the loss of any breeding habitat for these species within the sites.

Most proposed works will be focused on the bridge deck or areas below the deck. A few schemes will take place on the pylons or cables and a few would require in-water access to the piers. Osprey and terns in the area will likely be accustomed to the presence of the bridge and movement of vehicles on the bridge. It is likely that they already avoid the bridge in their usual flight paths for commuting and foraging within the Inner Moray Firth / Beaully Firth. BEAR Scotland collects and records reports of roadkill incidents but does not hold any roadkill records of common terns or osprey in the database, which includes records from 2013-2024. Installation of pigeon deterrents will include the use of bird spikes, gel pods, and steel mesh rather than netting, which will reduce the risk of entanglement for terns or osprey that may roost on A9 Kessock Bridge. Although some of the proposed works will entail the use of scaffolding, barges with machinery, or MEWPs, none of these would require installation of structures significantly higher than the bridge itself. In addition, all works and temporary access arrangements would be highly localised to the area of works on the bridge (e.g., underside of bridge deck, bridge piers, pylons, etc.) and are not expected to cause blockages to airspace above or below the bridge components, which reduces the risk that terns or osprey would collide with any machinery or equipment on the bridge. Where debris netting is required, it will be limited to the minimum amount required and will be installed as close to the working area as possible to reduce the risk of entanglement for terns or osprey. With these measures in place, the risk of mortality or injury to terns or osprey as a result of proposed works is considered to be low.

Osprey tend to nest in trees or on artificial platforms near freshwater (Goodship and Furness 2022). They have not been recorded nesting on Kessock Bridge previously and are not expected to nest on the bridge or within working areas near the bridge. Although there is potential for osprey nests to be present in trees along the coast of the Inner Moray Firth / Beaully Firth, none of the proposed works require tree felling. A permanent site compound is present below Span 13 at the northern end of the bridge and space is available at the southern abutment for a site compound if required. Therefore, it is not expected that any of the proposed works will result in direct loss of breeding habitat for osprey associated with the Inner Moray Firth SPA/Ramsar.

Common terns nest on shingle beaches, rocky islands, and gravelly shorelines (The Wildlife Trusts, 2025). Although some of these habitats may be present along the shores of the Inner Moray Firth / Beaully Firth near the bridge, the immediate vicinity of the bridge has a high level of urban development and high levels of anthropogenic activity. The Port of Inverness is present just west of the bridge. The urban settlements of Inverness and South Kessock occupy the southern shore of the Inner Moray Firth near the bridge, and the settlement of North Kessock occupies the northern shore of the firth just west of the bridge. The coastal habitats in these areas have been highly modified and experience high levels of human activity, which likely make them less suitable as breeding areas for common terns associated with the SPA/Ramsar. As all works will be highly localised to the bridge and immediate vicinity, and as

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any boats required for in-water access will launch from the Port of Inverness, it is not expected that any of the proposed works will result in direct loss of breeding habitat for common terns associated with the Inner Moray Firth SPA/Ramsar.

Risk of disturbance

Although disturbance tolerance can vary among osprey, NS recommends a disturbance buffer of 350-750m for osprey during the breeding season (Goodship and Furness 2022). Osprey are considered to occupy core ranges of 10km on average and can regularly forage up to 20km (NS 2016a). Although there is some evidence to suggest that terns can become habituated to certain types of human disturbance, NS recommends a disturbance buffer of 200-400m for common tern during the breeding season (Goodship and Furness 2022). Therefore, there is a risk that works on A9 Kessock Bridge could result in disturbance to breeding or foraging osprey and/or common terns associated with the SPA/Ramsar due to increased presence of vehicles, plant, personnel, and lighting on the bridge during works.

Most of the habitat present within 400m of A9 Kessock Bridge is not suitable to support breeding tern colonies. The southern shoreline is highly modified and is adjacent to the Port of Inverness and a busy industrial estate. The northern shoreline of the firth is dominated by the village of North Kessock west of the bridge, with Main Street running adjacent to the beach. The shoreline north of the bridge is less populated and may be more suitable for breeding terns; however, it is known to experience a high level of use by dog walkers and pedestrians and lies adjacent to the entrance to the Beaully Firth, which is a busy stretch of water for marine traffic.

Similarly, there is no suitable habitat for breeding osprey on the southern shore of the Firth within 750m of the bridge, as this area is dominated by urban development and lacks suitable tree cover. The northern shore is more wooded and may provide some suitable nesting habitat within 750m, primarily north of the bridge on the slopes of Ord Hill. The Highland Raptor Study Group was contacted in December 2024 for previous works at A9 Kessock Bridge and confirmed that there were no records of breeding ospreys within 1km of the bridge at that time.

Although most of the habitat present within disturbance distances for breeding common terns and osprey is considered to be unsuitable, these species may still be present within proximity of the bridge and could therefore be disturbed by works during the breeding season. Most of the proposed works will take place on or below the A9 Kessock Bridge deck where there is already an existing level of activity, noise, and light from traffic throughout the year and at all hours. Some research on common and Arctic terns has suggested that they may tolerate or become habituated to pedestrians, motorboats, and drones (Nisbet 2000, Chabot et al. 2015, Syrova et al. 2020, Goodship and Furness 2022). Osprey and terns in the vicinity of A9 Kessock Bridge are likely to be accustomed to existing levels of traffic and activity on the bridge and most proposed works (i.e., cyclic maintenance activities and smaller schemes) are unlikely to significantly differ from baseline levels of traffic noise, light, and activity on the bridge. Although an increase in baseline noise level is expected during works for some larger schemes, any increase in noise will be temporary, intermittent, of short duration, and localised to the trunk road. In addition, where higher-risk activities such as grit-blasting, painting, and hydro-demolition are required, full encapsulation of working areas will be installed to ensure containment of materials. Encapsulation will provide a barrier to reduce visual and acoustic disturbance. Most works that will require access or lighting outside of the carriageway (e.g., below the deck) will still be located close to the bridge deck and existing site compound areas below each end of the bridge. A few schemes will require in-water access (e.g., to the piers); however, these works will be highly localised and will generally last for three months or less. Additionally, there is ample alternative habitat for breeding and foraging terns and osprey within the SPA/Ramsar and wider Moray Firth area that will remain available outside of the working area and of the disturbance buffers for these species. Working hours are dependent on several factors (e.g., network restrictions on traffic management) and may entail daytime works, overnight works, or a combination of both. Certain activities may also require 24-hour access and could require short periods of extended working hours (e.g., over weekends to reduce impacts of road closures on vehicular travellers). However, the following measures will be in place to reduce the effects of disturbance on breeding or foraging osprey or terns in the vicinity of the bridge:

- Pre-construction osprey surveys and consultation with the Highland Raptor Study Group will be carried out prior to larger schemes with longer durations to identify any osprey nests within disturbance buffers of works.
- Consultation with NS will be carried out prior to larger schemes with longer durations to identify any known breeding colonies of common terns within disturbance distance of works.
- If any tern colonies or osprey nests are identified, additional consultation will be carried out with NS to agree suitable mitigation measures to reduce the risk of disturbance to breeding terns or osprey, such as:

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- Seasonal constraints on works to avoid the osprey and/or tern breeding season.
- Timing restrictions on works to reduce the risk of effects during the breeding season.
- Use of acoustic barriers within working areas or at site compound locations.
- The 'Birds' Toolbox Talk will be included in the SEMP and provided to all site staff prior to works commencing.
- Any artificial lighting required during night works or periods of low light levels will be directed at the area of works as far as is safe and reasonably practicable. Light spillage will be reduced as much as possible (e.g., via use of shades).
- A daily cessation of noisy works (e.g., hydro-demolition) will be planned during construction to allow a quiet period each day.
- Plant, machinery and equipment fitted with effective silencers where available will be utilised for the works. Where fitted, and where permitted under Health and Safety requirements, white noise reversing alarms will be utilised during construction.
- Where possible, inherently quiet plant will be selected for construction works. Where appropriate, pumps and generators will be sound-reduced models with fitted, lined, and sealed acoustic covers.
- All plant will be operated in such a way that minimises noise emissions and be switched off when not in use.
- All ancillary plant such as generators will be positioned so as to cause minimum noise disturbance. Where deemed necessary, acoustic screens will be utilised.
- For larger schemes with longer durations, an Ecological Clerk of Works (ECoW) will attend site regularly during works to monitor sensitive ecological receptors (e.g., breeding osprey and terns) and mitigation measures to reduce impacts.

Although there is limited suitable breeding habitat for common terns and osprey within disturbance distance of the bridge, there is a risk that the proposed 10-year programme of works at A9 Kessock Bridge could result in disturbance to these species during the breeding season. However, with the above measures in place to reduce the effects of noise, lighting, and presence of construction equipment and staff, the risk of significant disturbance to breeding terns and osprey within the SPA/Ramsar is considered to be low.

Risk of pollution

For all of the proposed maintenance activities, there is potential for indirect effects on breeding terns and osprey, their supporting habitats, and prey species as a result of pollution from construction activities or from discharge of water used in hydro-demolition. However, the standard working practices listed in Stage 1 and Appendix B include robust containment measures to prevent pollution events for all works. Furthermore, as noted in Stage 1, full encapsulation will be in place for certain activities that pose a higher risk of pollution (e.g., grit-blasting, painting, hydro-demolition) to ensure that all debris, materials, and wastes are contained and removed from site. Water used in hydro-demolition will be captured, appropriately treated to reduce pH and suspended solids, and removed or (where required) discharged under an appropriate authorisation from SEPA. The volume and rate of discharge will be agreed with SEPA and will determine the level of authorisation required to permit discharge. Treatment of water prior to discharge will be carried out with appropriate values for pH and suspended solids stipulated in the SEMP. Typically, a pH value between 5-9 and a suspended solids value between 80-100mg/l is considered acceptable for discharge. Discharging to a location on land will be planned where possible and will be the preferred option over discharging directly to the marine environment. Authorisation will be sought from SEPA to permit discharge of wastewater as required on a scheme-by-scheme basis as required and no discharges will take place until the appropriate authorisation is secured.

None of the proposed works involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Inner Moray Firth / Beaully Firth. The proposed works in the 10-year programme will be highly localised and adhere to standard good practice for pollution prevention; therefore, no significant effects on fish within the Inner Moray Firth SPA/Ramsar (i.e., prey for osprey and terns) have been identified.

With these measures in place during works, the risk of indirect effects on breeding osprey and terns and their supporting habitats and prey species as a result of pollution is limited.

Overwintering birds

The Inner Moray Firth SPA/Ramsar and component SSSIs support a range of overwintering wader and wildfowl species which are known to forage and roost within the designated site boundaries. The nearest part of the SPA/Ramsar/SSSIs is located approximately 2.18km southeast of the A9 Kessock Bridge; however, the qualifying

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bird species are highly mobile and are expected to use areas in the vicinity of works. Therefore, the proposed works have potential to contribute to three main risks for overwintering birds, including risk of mortality (e.g., due to collisions, entanglement with equipment, loss of habitat), risk of disturbance, and risk of pollution (including effects of changes to water quality and food resources).

Risk of mortality

All of the proposed works at A9 Kessock Bridge will be highly localised to the immediate vicinity of the bridge. No works will take place within the boundary of the Inner Moray Firth SPA/Ramsar or SSSIs; therefore, works will not result in the loss of any supporting habitat for overwintering birds within the sites.

Most proposed works will be focused on the bridge deck or areas below the deck. A few schemes will take place on the pylons or cables and a few would require in-water access to the piers. Overwintering birds in the area will likely be accustomed to the presence of the bridge and movement of vehicles on the bridge. It is likely that they already avoid the bridge in their usual flight paths for commuting and foraging within the Inner Moray Firth / Beaully Firth. BEAR Scotland collects and records reports of roadkill incidents but does not hold any roadkill records of these species in the database, which includes records from 2013-2024. Installation of pigeon deterrents will include the use of bird spikes, gel pods, and steel mesh rather than netting, which will reduce the risk of entanglement for any of the qualifying bird species that may roost on A9 Kessock Bridge. Although some of the proposed works will entail the use of scaffolding, barges with machinery, or MEWPs, none of these would require installation of structures significantly higher than the bridge itself. In addition, all works and temporary access arrangements would be highly localised to the area of works on the bridge (e.g., underside of bridge deck, bridge piers, pylons, etc.) and are not expected to cause blockages to airspace above or below the bridge components, which reduces the risk that birds would collide with any machinery or equipment on the bridge. Where debris netting is required, it will be limited to the minimum amount required and will be installed as close to the working area as possible to reduce the risk of entanglement for qualifying bird species. With these measures in place, the risk of mortality or injury to overwintering birds as a result of proposed works is considered to be low.

Winter foraging habitat for the qualifying bird species includes sheltered coastal habitat and intertidal areas for most species. Curlew and greylag goose can forage in nearby agricultural fields and grasslands. Most of these species roost in large flocks on the coast at high tide or in sheltered lagoons. Goldeneye will roost on open water and scaup generally roost on the sea during the day (Goodship and Furness 2022). As such, it is unlikely that any of these species would be found roosting on A9 Kessock Bridge. Although winter foraging and roosting habitat for the qualifying species is likely present along the coast of the Inner Moray Firth / Beaully Firth, no works will take place within the boundary of the Inner Moray Firth SPA/Ramsar or associated SSSIs. All works will be highly localised to the bridge and none of the proposed works require works or access on shorelines or intertidal areas along the coast. Therefore, it is not expected that any of the proposed works will result in direct loss of overwintering habitat for the qualifying species associated with the Inner Moray Firth SPA/Ramsar and SSSIs.

Risk of disturbance

The qualifying non-breeding species are considered to have a medium to high sensitivity to disturbance (Goodship and Furness 2022). These species are particularly sensitive to disturbance during foraging and/or roosting periods, as significant and/or repeated disturbance can result in increased energy expenditures and loss of condition, which can subsequently result in mortality. NS recommends the following disturbance buffers during the non-breeding season for the qualifying overwintering species (Goodship and Furness 2022):

- Bar-tailed godwit, non-breeding = 200-300m
- Curlew, non-breeding = 200-650m
- Goldeneye, non-breeding = 150-800m
- Greylag goose, non-breeding = 200-600m
- Oystercatcher, non-breeding = 150-300m
- Redshank, non-breeding = 200-300m
- Scaup, non-breeding = 150-450m
- Wigeon, non-breeding = 200-500m

No data is available in relation to disturbance buffers for the rest of the qualifying bird species within the Inner Moray Firth SPA/Ramsar and associated SSSIs (cormorant, goosander, red-breasted merganser, teal, waterfowl assemblage (all non-breeding)). However, it is assumed that these species will have disturbance buffers that are roughly equivalent to the species listed above, which are similar species with similar ecological requirements.

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Therefore, disturbance buffers under 800m are assumed for the species listed above for which no specific data is available.

Various works (both schemes and cyclic maintenance) are expected to be completed during the overwintering period (October to March) over the next ten years. The qualifying non-breeding species associated with the Inner Moray Firth SPA/Ramsar and associated SSSIs are highly mobile and may use areas in proximity to A9 Kessock Bridge. Therefore, there is a risk that works on A9 Kessock Bridge could result in disturbance to foraging or roosting birds associated with the SPA/Ramsar/SSSI during the overwintering period due to increased presence of vehicles, plant, personnel, and lighting on the bridge during works.

Most of the qualifying bird species forage during low tide times (e.g., on intertidal mudflats) and roost on the coast during high tide (Goodship and Furness 2022). Goldeneye roost on open water at night and scaup roost on the sea in flocks during the day. These species tend avoid areas with high boat traffic and are therefore unlikely to be found roosting close to Kessock Bridge (Goodship and Furness 2022). Most of the habitat present within 800m west of A9 Kessock Bridge is unlikely to be suitable as roosting habitat for the qualifying bird species. Shoreline areas west of the bridge are highly modified, support urban settlements, and experience high levels of human activity, both on shore and in the water. Areas within 800m east and north of the bridge are less developed and may provide more suitable roosting and foraging habitat, although the shoreline north of the bridge is known to experience a high level of use by dog walkers and pedestrians. However, the intertidal areas southeast of the bridge are known to be used by foraging waders.

Although most of the habitat present within disturbance distances for overwintering birds is likely sub-optimal, these species may still be present within proximity of the bridge. Most of the proposed works will take place on or below the A9 Kessock Bridge deck where there is already an existing level of activity, noise, and light from traffic throughout the year and at all hours. Research on some species (bar-tailed godwit, curlew, greylag goose, oystercatcher) has suggested that they may tolerate or become habituated to some human disturbance (Versluijs 2011, Woodward et al. 2015, Collop 2016, Diaz et al. 2021, Goodship and Furness 2022), and birds in the vicinity of A9 Kessock Bridge are likely to be accustomed to existing levels of traffic and activity on the bridge. Most of the proposed works (i.e., cyclic maintenance activities and smaller schemes) are unlikely to significantly differ from baseline levels of traffic noise, light, and activity on the bridge. Although an increase in baseline noise level is expected during works for some larger schemes, any increase in noise will be temporary, intermittent, of short duration, and localised to the trunk road. In addition, where higher-risk activities such as grit-blasting, painting, and hydro-demolition are required, full encapsulation of working areas will be installed to ensure containment of materials. Encapsulation will provide a barrier to reduce visual and acoustic disturbance. Most works that will require access or lighting outside of the carriageway (e.g., below the deck) will still be located close to the bridge deck and existing site compound areas below each end of the bridge and are unlikely to significantly affect overwintering birds in the area. The few schemes that will require in-water access (e.g., to the piers) may have a higher risk of resulting in disturbance to nearby roosting or foraging birds, which can be sensitive to pedestrians and boat use (Goodship and Furness 2022) and as human activity in these areas is less common than activity near the bridge deck. However, the bridge spans a busy corridor for marine traffic, so the use of boats in this area is not unusual and birds in the area are likely to be accustomed to regular boat traffic. Additionally, there is ample alternative habitat for roosting and foraging birds within the SPA/Ramsar/SSSIs and wider Moray Firth area that will remain available outside of the working area and of the disturbance buffers for these species.

Working hours are dependent on several factors (e.g., network restrictions on traffic management) and may entail daytime works, overnight works, or a combination of both. Certain activities may also require 24-hour access and could require short periods of extended working hours (e.g., over weekends to reduce impacts of road closures on vehicular travellers). However, as noted, the majority of works will be focused near the bridge deck where there are existing levels of noise, activity, and lighting at all hours, so qualifying species that may be present along the coast during roosting or foraging periods are unlikely to be significantly affected by most works, regardless of the timing. Works requiring in-water access will likely need to consider tide times in their programming (e.g., works can only take place during low tide). There is a risk that foraging or roosting periods could be affected by these works, depending on scheme-specific programmes. However, these works will be highly localised, will take place in areas already subject to high levels of marine traffic, and will be of relatively short durations. In addition, there is ample alternative habitat for roosting and foraging birds within the SPA/Ramsar/SSSIs and wider Moray Firth area that will remain available outside of the working area and of the disturbance buffers for these species.

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However, prior to larger schemes with longer durations that may commence or extend into the overwintering period, surveys will be programmed and undertaken to identify any areas of use for roosting or foraging by the qualifying non-breeding bird species that could be affected by works. If any areas are identified, additional consultation would be carried out with NS to agree suitable mitigation measures. These may include seasonal constraints on working to avoid the overwintering period, a requirement to avoid construction site compounds or other features within or near confirmed roost sites, and/or use of visual/acoustic barriers between working areas and roost or foraging sites. In addition, the following measures will be in place to reduce the effects of disturbance on overwintering birds in the vicinity of the bridge:

- Pre-construction surveys will be carried out prior to larger schemes with longer durations to identify any evident roosting or foraging areas for overwintering birds within disturbance buffers of works.
 - If any are identified, additional consultation will be carried out with NS to agree suitable mitigation measures to reduce the risk of disturbance to overwintering birds, such as:
 - Seasonal constraints on works to avoid the overwintering period.
 - Timing restrictions on works to reduce the risk of effects during the overwintering period.
 - Use of visual and/or acoustic barriers within working areas or at site compound locations.
- The 'Birds' Toolbox Talk will be included in the SEMP and provided to all site staff prior to works commencing.
- Access to intertidal areas and mudflats in the Inner Moray Firth / Beaully Firth will be avoided during cold weather when seven or more consecutive days of freezing conditions have been recorded, which can leave overwintering birds more vulnerable to disturbance.
- Any artificial lighting required during night works or periods of low light levels will be directed at the area of works as far as is safe and reasonably practicable. Light spillage will be reduced as much as possible (e.g., via use of shades).
- A daily cessation of noisy works (e.g., hydro-demolition) will be planned during construction to allow a quiet period each day.
- Plant, machinery and equipment fitted with effective silencers where available will be utilised for the works. Where fitted, and where permitted under Health and Safety requirements, white noise reversing alarms will be utilised during construction.
- Where possible, inherently quiet plant will be selected for construction works. Where appropriate, pumps and generators will be sound-reduced models with fitted, lined, and sealed acoustic covers.
- All plant will be operated in such a way that minimises noise emissions and be switched off when not in use.
- All ancillary plant such as generators will be positioned so as to cause minimum noise disturbance. Where deemed necessary, acoustic screens will be utilised.
- For larger schemes with longer durations, an Ecological Clerk of Works (ECoW) will attend site regularly during works to monitor sensitive ecological receptors (e.g., overwintering birds) and mitigation measures to reduce impacts.

There is a risk of disturbance to overwintering birds as a result of the proposed 10-year programme of works at A9 Kessock Bridge, particularly for certain activities that will require in-water access via boats. However, with the use of surveys and with the above measures in place to reduce the effects of noise, lighting, and presence of construction equipment and staff, the risk of significant disturbance to overwintering birds within the SPA/Ramsar/SSSI is considered to be low.

Risk of pollution

For all of the proposed maintenance activities, there is potential for indirect effects on overwintering birds, their supporting habitats, and prey species as a result of pollution from construction activities or from discharge of water used in hydro-demolition. However, the standard working practices listed in Stage 1 and Appendix B include robust containment measures to prevent pollution events for all works. Furthermore, as noted in Stage 1, full encapsulation will be in place for certain activities that pose a higher risk of pollution (e.g., grit-blasting, painting, hydro-demolition) to ensure that all debris, materials, and wastes are contained and removed from site. Water used in hydro-demolition will be captured, appropriately treated to reduce pH and suspended solids, and removed or (where required) discharged under an appropriate authorisation from SEPA. The volume and rate of discharge will be agreed with SEPA and will determine the level of authorisation required to permit discharge. Treatment of water prior to discharge will be carried out with appropriate values for pH and suspended solids stipulated in the SEMP. Typically, a pH value between 5-9 and a suspended solids value between 80-100mg/l is considered acceptable for discharge. Discharging

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to a location on land will be planned where possible and will be the preferred option over discharging directly to the marine environment. Authorisation will be sought from SEPA to permit discharge of wastewater as required on a scheme-by-scheme basis as required and no discharges will take place until the appropriate authorisation is secured.

None of the proposed works involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Inner Moray Firth / Beaully Firth. The proposed works in the 10-year programme will be highly localised and adhere to standard good practice for pollution prevention; therefore, no significant effects on fish, invertebrates, or vegetation within the Inner Moray Firth SPA/Ramsar (i.e., food resources for overwintering birds) have been identified.

With these measures in place during works, the risk of indirect effects on overwintering birds and their supporting habitats and prey species as a result of pollution is limited.

Cumulative and in-combination effects – breeding terns and osprey, overwintering birds

The proposed activities will be highly localised to the A9 Kessock Bridge and immediate vicinity and indicative timing of works over the next 10 years has been estimated (refer to Table 1 and the supporting document ‘**Supporting Information - A9 Kessock 10-Year Programme**’). However, these dates are subject to change. The proposed works in the 10-year programme also range from very minor reactive maintenance activities that could take one or two days to complete to larger planned schemes that could take several months to complete, and which may not take place for several more years. Consequently, it is not practicable at this time to search for other plans or projects that may have cumulative or in-combination effects until individual maintenance schemes are designed and submitted for environmental assessment. As noted above, a search will be undertaken for other plans and projects that could have cumulative or in-combination effects in the vicinity of the proposed maintenance works on a case-by-case basis once individual maintenance schemes are designed and submitted for environmental assessment. If there is potential for these effects, additional consultation will be carried out with NS. However, considering the nature and scale of each of the maintenance activities, distance to the SPA/Ramsar/SSSIs, and the high levels of anthropogenic activity in the vicinity of the bridge, there is likely to be limited potential for significant cumulative or in-combination effects on the qualifying species or habitats due to other plans or projects.

There is some potential for cumulative or in-combination effects resulting from multiple activities carried out by BEAR due to the amount of maintenance works required on A9 Kessock Bridge over the next 10 years. However, all works will be highly localised to the bridge, which is located over 2km from the sites in an area of high anthropogenic activity, including marine activity associated with the Port of Inverness. Most of the works are located on or immediately below the bridge deck, which is elevated above the water. Additionally, only a small number of works will require access boats or barges. Therefore, the risk of significant cumulative disturbance impacts on the qualifying bird species is likely to be low. Although some minor cyclic maintenance could be carried out during or close to the timing of a larger scheme, any planned larger schemes typically will be spaced out across the 10-year programme due to budget limitations and required lead-in time for tendering and mobilisation, which reduces the risk of significant cumulative or in-combination effects due to disturbance on and around the bridge. 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, noise disturbance in localised areas due to construction noise and activities is also limited.

Overall, due to the nature and scale of the proposed activities, the distance of the bridge from the designated sites, the location of the bridge within an area of high anthropogenic activity, its elevated position above the marine environment, minor use of boats and barges, and the limited potential for overlap of activities during the 10-year programme, it is unlikely that any of the proposed works would result in significant cumulative or in-combination effects on the qualifying features of the Inner Moray Firth SPA/Ramsar/SSSIs.

Conclusion

Upon detailed review, the majority of proposed works at A9 Kessock Bridge over the next 10 years have limited potential to affect supporting habitats of the qualifying bird species within the SPA and Ramsar. There is a risk that works could result in disturbance of the qualifying species or impacts due to pollution. **However, with the above measures in place alongside robust containment measures, these works are not expected to result in AESI for the Inner Moray Firth SPA/Ramsar, and all conservation objectives the qualifying bird species within the SPA will be met.**

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Similarly, no significant negative impacts have been identified on the qualifying features of Beaully Firth SSSI, Munloch Bay SSSI, or Longman and Castle Stuarts Bays SSSI as a result of proposed works.

4. River Moriston SAC

Atlantic salmon and FWPM

As noted above, the River Moriston SAC is designated for Atlantic salmon and FWPM and is located approximately 41.68km from the A9 Kessock Bridge at the nearest point of hydrological connectivity that could be used by salmon. Atlantic salmon associated with the River Moriston SAC travel via Loch Ness and the River Ness and pass under the Kessock Bridge to reach the open sea. Migrating salmon return via this route to spawn in the River Moriston SAC.

Although the proposed works at A9 Kessock Bridge will not include fishing or use of nets (which could result in mortality of salmon), some works will require the use of vessels within the migration route of salmon and all works have potential to result in pollution of the marine environment. Therefore, there is a risk of direct impacts on salmon due to collision with construction vessels and a risk of indirect impacts on salmon due to disturbance (e.g., underwater noise, loss of foraging habitat), and pollution. As Atlantic salmon function as a host species for FWPM, any effects on salmon may have knock-on effects on the FWPM population associated with the River Moriston SAC.

Risk of direct effects

No works will take place within the River Moriston SAC. However, the A9 Kessock Bridge spans the migration route used by salmon associated with the SAC; therefore, works and/or access will take place within or adjacent to this route. All proposed works will be highly localised to the A9 Kessock Bridge and immediate surroundings. Small access boats and barges will be required for some of these works, although it is not anticipated that equipment such as netting or lines that could present a higher risk of mortality to salmon will be required. The majority of proposed schemes and cyclic maintenance works will take place on the bridge deck, which is situated approximately 29.2m above MHWS (highest tide level of the water below) at the central span. Even the schemes and cyclic maintenance works that will require works or access below the bridge deck will be suspended fairly high above the water and will utilise appropriate containment methods (e.g., encapsulation) to prevent loss of equipment or materials into the marine environment. Therefore, the risk of injury or mortality to salmon is negligible for most proposed works.

Only a small number of proposed works (e.g., structural health monitoring, ropes and ladders, minor concrete repairs, inspections and surveys) may require in-water access using boats or barges, which carry the highest risk of direct impacts to salmon (e.g., via entanglement with equipment and/or collisions with vessels). Salmon are more likely to be present near the bridge during the spring migration of smolts (young salmon) from the River Ness system into the Inner Moray Firth and during the migration of adult salmon returning to the River Ness system to spawn during the autumn and winter months. Collectively, salmon are more likely to be present in the Inner Moray Firth between approximately October-May. The few schemes requiring access using boats or barges are expected to take between 1-3 months or less to complete and may take place at any time of the year. Where possible, these works will be programmed for the summer months to avoid the salmon migration periods. If works are required to take place during October to March, the risk of significant effects on salmon due to boat use is expected to be low; however, consultation will be carried out with the Ness District Salmon Fishery Board (DSFB) in these cases to identify whether additional mitigation measures would be required. This area of the Inner Moray Firth / Beaully Firth experiences a high level of marine traffic and is located close to the Port of Inverness. Any boats or vessels required for works will launch from the Port of Inverness and will be stationed at the area of works (likely at bridge piers), only moving small distances as required. As salmon 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 direct effects on migrating Atlantic salmon associated with the SAC due to the use of construction vessels is considered to be low.

FWPM associated with the SAC will not be directly affected by the proposed works. Similarly, as described above, the risk of direct impacts on their host species, Atlantic salmon, is assessed to be low, which also reduces the risk of indirect effects on FWPM as a result of salmon mortality due to works.

Risk of indirect effects (disturbance, pollution, INNS)

No in-water works are currently planned on A9 Kessock Bridge. Most of the proposed works do not entail in-water access and therefore will not result in significant underwater noise that could cause disturbance to Atlantic salmon. A few works (structural health monitoring, ropes and ladders, minor concrete repairs, inspections and surveys) will likely produce some underwater noise due to the use of barges or other boats, but none of these works are anticipated to entail activities that would create impulsive noise or significant vibration (e.g., pile driving, explosions). Where

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possible, these will be programmed during daylight hours to reduce the need for artificial lighting near the water's surface.

Atlantic salmon are likely to be habituated to existing levels of noise and activity due to boat traffic within the Inner Moray Firth, Beaully Firth, and wider Moray Firth. The Port of Inverness is located just west of A9 Kessock Bridge and is in a corridor of high-density vessel traffic ([Marine Scotland - National Marine Plan Interactive](#)). The few proposed activities at A9 Kessock Bridge that require the use of boats or vessels are therefore unlikely to result in significantly higher levels of noise than baseline levels in this high-traffic area. Salmon are highly mobile and can avoid more heavily trafficked areas and utilise alternative undisturbed areas of the Firth on their way to or from the River Ness system. Additionally, a study of migrating smolts from the River Ness system observed that smolts took an average of 1.44 days to travel from the River Ness at Ness-side to Chanonry Point (Ness District Salmon Fishery Board 2019). This suggests that smolts quickly travel the section of the migration route that passes under the A9 Kessock Bridge and are unlikely to be in the area for long. Adult salmon likely travel this section quickly as well during the migration to spawn. However, the standard working practices noted in Stage 1 and Appendix B include measures to reduce noise and lighting on site during works. Therefore, any short-term effects of disturbance on salmon in the Inner Moray Firth are not expected to have a significant detrimental effect on the salmon population associated with the River Moriston SAC.

There is potential for indirect effects on salmon, their supporting habitats, and prey species as a result of pollution from construction activities or from discharge of water used in hydro-demolition. However, no in-water works are currently planned and the standard working practices listed in Stage 1 and Appendix B include robust containment measures to prevent pollution events for all works. Furthermore, as noted in Stage 1, full encapsulation will be in place for certain activities that pose a higher risk of pollution (e.g., grit-blasting, painting, hydro-demolition) to ensure that all debris, materials, and wastes are contained and removed from site. Water used in hydro-demolition will be captured, appropriately treated to reduce pH and suspended solids, and removed or (where required) discharged under an appropriate authorisation from SEPA. The volume and rate of discharge will be agreed with SEPA and will determine the level of authorisation required to permit discharge. Treatment of water prior to discharge will be carried out with appropriate values for pH and suspended solids stipulated in the SEMP. Typically, a pH value between 5-9 and a suspended solids value between 80-100mg/l is considered acceptable for discharge. Discharging to a location on land will be planned where possible and will be the preferred option over discharging to the marine environment. Authorisation will be sought from SEPA to permit discharge of wastewater as required on a scheme-by-scheme basis and no discharges will take place until the appropriate authorisation is secured.

The invasive non-native species slipper limpet, chain tunicate, and *Schizoporella japonica* have been recorded in the Cromarty and Moray Firths and pink salmon have been recorded in the River Ness ([National Marine Plan Interactive](#)); however, the standard and activity-specific working practices noted in Stage 1 and Appendix B also include provisions to reduce the risk of transporting invasive species during works, such as washing equipment or vehicles prior to moving between water bodies and utilising a '[Check Clean Dry](#)' methodology. These, in combination with standard containment measures, are expected to significantly reduce the risk of transporting invasive species within or around the Inner Moray Firth, River Ness, and wider marine environment. Therefore, the risk of indirect effects on the qualifying species as a result of the spread of invasive species during proposed works at A9 Kessock Bridge is considered to be low.

None of the proposed works at A9 Kessock Bridge involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Inner Moray Firth or Beaully Firth. Therefore, the proposed activities will not result in direct loss of supporting habitat Atlantic salmon or their prey species. Works requiring in-water access are unlikely to temporarily reduce available foraging areas or migration routes due to the scale and highly localised nature of these works and the size and mobility of salmon.

Considering the above, no significant effects on migrating Atlantic salmon associated with the River Moriston SAC have been identified as a result of disturbance or pollution from the proposed works.

Similarly, the risk of indirect effects on FWPM is assessed to be low, due to the low risk of indirect effects on salmon as a result of disturbance or pollution from works.

Cumulative and in-combination effects – Atlantic salmon and FWPM

The proposed activities will be highly localised to the A9 Kessock Bridge and immediate vicinity and indicative timing of works over the next 10 years has been estimated (refer to Table 1 and the supporting document '[Supporting](#)

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Information - A9 Kessock 10-Year Programme). However, these dates are subject to change. The proposed works in the 10-year programme also range from very minor reactive maintenance activities that could take one or two days to complete to larger planned schemes that could take several months to complete, and which may not take place for several more years. Consequently, it is not practicable at this time to search for other plans or projects that may have cumulative or in-combination effects until individual maintenance schemes are designed and submitted for environmental assessment. As noted above, a search will be undertaken for other plans and projects that could have cumulative or in-combination effects in the vicinity of the proposed maintenance works on a case-by-case basis once individual maintenance schemes are designed and submitted for environmental assessment. If there is potential for these effects, additional consultation will be carried out with NS. However, considering the nature and scale of each of the maintenance activities and the high levels of anthropogenic activity in the vicinity of the bridge, there is likely to be limited potential for significant cumulative or in-combination effects on Atlantic salmon or FWPM associated with the SAC due to other plans or projects.

There is some potential for cumulative or in-combination effects resulting from multiple activities carried out by BEAR due to the amount of maintenance works required on A9 Kessock Bridge over the next 10 years. However, all works will be highly localised to the bridge, which spans a very small part of the migration route used by salmon associated with the SAC and is located in an area of high anthropogenic activity, including marine activity associated with the Port of Inverness. Most of the works are located on or immediately below the bridge deck, which is elevated above the water. Additionally, only a small number of works will require access boats or barges. Therefore, the risk of significant cumulative noise impacts on salmon is likely to be low. Although some minor cyclic maintenance could be carried out during or close to the timing of a larger scheme, any planned larger schemes typically will be spaced out across the 10-year programme due to budget limitations and required lead-in time for tendering and mobilisation, which reduces the risk of significant cumulative or in-combination effects due to disturbance on and around the bridge. 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, noise disturbance in localised areas due to construction noise and activities is also limited.

Overall, due to the nature and scale of the proposed activities, the location of the bridge within an area of high anthropogenic activity, its elevated position above the marine environment, minor use of boats and barges, and the limited potential for overlap of activities during the 10-year programme, it is unlikely that any of the proposed works would result in significant cumulative or in-combination effects on the qualifying features Atlantic salmon and FWPM associated with the River Moriston SAC.

Conclusion

Upon detailed review, the majority of proposed works at A9 Kessock Bridge over the next 10 years have limited potential to result in LSE on Atlantic salmon or FWPM within the SAC. A few activities carry a higher risk of impacting these features due to the use of boats, noise disturbance, or pollution. **However, with the above measures in place alongside robust containment measures, these works are not expected to result in AESI for the River Moriston SAC, and all conservation objectives for Atlantic salmon and FWPM within the SAC will be met.**

5. Dornoch Firth and Morrich More SAC

Harbour seal

As noted above, the Dornoch Firth and Morrich More SAC is designated for harbour seal and is located approximately 59.0km from the A9 Kessock Bridge at the nearest point of hydrological connectivity that could be used by seals.

Although the proposed works at A9 Kessock Bridge will not include fishing or use of nets (which could entangle seals), some works will require the use of boats or barges and all works have potential to result in pollution of the marine environment. Additionally, there is a designated seal haul-out site in the Beaully Firth approximately 2.5km west of the A9 Kessock Bridge that may be used by seals associated with the SAC. Therefore, there is a risk of direct impacts on seals due to collision with vessels used during construction and a risk of indirect impacts on seals due to disturbance (e.g., from underwater noise from boats or while hauled out), and pollution.

Risk of collision

None of the proposed maintenance activities would entail works within the boundaries of the SAC. All proposed works would be highly localised to the A9 Kessock Bridge and immediate surroundings; therefore, any works would be located over 59km from the nearest connected point of the SAC. Only a small number of proposed works (e.g.,

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structural health monitoring, ropes and ladders, minor concrete repairs, inspections and surveys), may require in-water access using boats or barges, which carry the highest risk of direct impacts to harbour seals (e.g., via entanglement with equipment and/or collisions with vessels). Small access boats and barges will be required for some of these works, although it is not anticipated that any equipment such as netting or lines that could present a higher risk of entanglement to seals will be required. Most of the proposed works will take place on the bridge deck or by using below-deck access (e.g., scaffolding, gantry, underbridge unit). Therefore, the risk of construction vessels colliding with harbour seals is negligible for most proposed works.

Even for works that will require in-water works or access, harbour seals are likely to use the nearby haul-out site during low tide, when the use of access boats is unlikely to be required. When the use of boats is required, any boats or vessels will launch from local points where possible to limit travel distances. The few schemes requiring access using boats or barges are expected to take between 1-3 months or less to complete. It is expected that any boats or vessels required will be stationed at the area of works (likely at bridge piers), only moving small distances as required, which will reduce the risk of collision with any seals in the area. Where the use of boats or other vessels is required to carry out works, all vessels operating during works will adhere to the general principles in the 'Scottish Marine Wildlife Watching Code' and 'A Guide to Best Practice for Watching Marine Wildlife' (NS 2016b, NS 2017), including the following measures:

- Vessels will not approach any marine wildlife.
- Vessels will maintain a safe distance (at least 50m, preferably more) from any marine wildlife passing through the area of works and/or access routes.
- Vessels will avoid sudden unpredictable changes in speed, direction, and engine noise.
- Vessels will not cut off an animal or group of animals by moving across their path and will not approach them from behind.

With these measures in place, and as harbour seals 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 seals associated with the SAC is considered to be low.

Risk of disturbance

Harbour seals are sensitive to underwater noise and human activities which can cause disturbance when they are resting at haul-out sites, particularly in June-August when they breed and moult at haul-out sites. Although harbour seals can become accustomed to some types of regular disturbance, the close approach of humans or the introduction of new or unpredictable noise or other types of disturbance to seals at haul-out sites can detrimentally affect the survival of pups through interrupted feeding and/or separation of mothers from pups (NS, 2025).

No in-water works are planned and most of the proposed works on A9 Kessock Bridge do not require in-water access. Therefore, the majority of works will not result in significant underwater noise that could cause disturbance to harbour seals. Some minor underwater noise is likely to be produced due to the use of boats or barges for structural health monitoring, ropes and ladders, minor concrete repairs, and some inspections and surveys. However, none of these works are anticipated to entail activities that would create impulsive noise (e.g., pile driving, explosions) that can be detrimental to hearing in marine mammals (Southall et al. 2019).

Paterson et al. (2019) studied the effects of anthropogenic disturbance (boat traffic) on harbour seals at haul-out sites on the west coast of Scotland and found that seals showed a high site fidelity to haul-out sites and did not move large distances between haul-out sites in response to boat disturbance over the timescale of a few months. Disturbance trials used in the study involved boats approaching hauled-out seals until all seals flushed into the water. Counts and telemetry data were then used to record the time it took for hauled-out seal numbers to return to pre-disturbance levels. A majority of seals (52%) were found to return to the haul-out site within 30 minutes of disturbance, although it could take up to 4 hours to return to pre-disturbance numbers (94%). The proposed works at A9 Kessock Bridge are highly unlikely to require similar levels of boat use or close approaches to hauled-out seals compared to the study methods, and any seals using the Beaully Firth haul-out site are likely to be habituated to some boat traffic and human activities on shore. In addition, the Port of Inverness is located just west of A9 Kessock Bridge and is in a corridor of high-density vessel traffic ([Marine Scotland - National Marine Plan Interactive](#)). The few proposed activities at A9 Kessock Bridge that require the use of boats or vessels are therefore unlikely to result in significantly higher levels of noise than baseline levels in this high-traffic area. However, all site staff will be instructed not to approach, touch, or feed any seals using the Beaully Firth haul-out site or nearby coastal areas during works. The

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general principles outlined above in the 'Scottish Marine Wildlife Watching Code' and 'A Guide to Best Practice for Watching Marine Wildlife' (NS 2016b, NS 2017) will be adhered to during works. With these measures in place, any short-term effects of disturbance on harbour seals using the Beaully Firth haul-out site are not expected to have a significant detrimental effect on the harbour seal population within the Dornoch Firth and Morrich More SAC.

The A9 Kessock Bridge is located outside of the Dornoch Firth and Morrich More SAC and none of the works involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Dornoch Firth or connected waterbodies. Therefore, the proposed maintenance activities would not result in direct loss of habitat for harbour seals or their prey species within the SAC. Some works requiring in-water access may temporarily reduce available foraging areas, but harbour seals are highly mobile and would have abundant habitat of good foraging quality available in the wider Moray Firth and Beaully Firth. The proposed works in the 10-year programme would be highly localised and adhere to standard good practice for pollution prevention. Additional measures (e.g., encapsulation) will also be employed for certain activities such as painting, grit-blasting, and hydro-demolition to ensure containment of all works. Therefore, no significant effects on fish within the Moray Firth or Beaully Firth (i.e., prey for harbour seals) have been identified.

Upon detailed review, the works are considered to carry limited potential to result in significant disturbance impacts for harbour seals associated with the Dornoch Firth and Morrich More SAC. In addition, considering that harbour seals are highly mobile and capable of moving to undisturbed areas of the wider Moray Firth area, the risk of significant disturbance on harbour seals as a result of the proposed works is considered to be low.

Risk of pollution

Harbour seals and their prey species are highly mobile. Therefore, there is potential for indirect effects on seals, their supporting habitats, and prey species as a result of pollution from construction activities or from discharge of water used in hydro-demolition. However, the standard working practices listed in Stage 1 and Appendix B include robust containment measures to prevent pollution events for both all works. Furthermore, as noted in Stage 1, full encapsulation will be in place for certain activities that pose a higher risk of pollution (e.g., grit-blasting, painting, hydro-demolition) to ensure that all debris, materials, and wastes are contained and removed from site. Water used in hydro-demolition will be captured, appropriately treated to reduce pH and suspended solids, and removed or (where required) discharged under an appropriate authorisation from SEPA. The volume and rate of discharge will be agreed with SEPA and will determine the level of authorisation required to permit discharge. Treatment of water prior to discharge will be carried out with appropriate values for pH and suspended solids stipulated in the SEMP. Typically, a pH value between 5-9 and a suspended solids value between 80-100mg/l is considered acceptable for discharge. Discharging to a location on land will be planned where possible and will be the preferred option over discharging to the marine environment. Authorisation will be sought from SEPA to permit discharge of wastewater as required on a scheme-by-scheme basis and no discharges will take place until the appropriate authorisation is secured.

None of the proposed works involve activities that would result in changes to the water levels, tides, or other hydrological processes in the Dornoch Firth or connected waterbodies. The proposed works in the 10-year programme will be highly localised and adhere to standard good practice for pollution prevention; therefore, no significant effects on fish within the Dornoch Firth and Morrich More SAC (i.e., prey for harbour seals) have been identified.

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

Cumulative and in-combination effects

The proposed activities will be highly localised to the A9 Kessock Bridge and immediate vicinity and indicative timing of works over the next 10 years has been estimated (refer to Table 1 and the supporting document '**Supporting Information - A9 Kessock 10-Year Programme**'). However, these dates are subject to change. The proposed works in the 10-year programme also range from very minor reactive maintenance activities that could take one or two days to complete to larger planned schemes that could take several months to complete, and which may not take place for several more years. Consequently, it is not practicable at this time to search for other plans or projects that may have cumulative or in-combination effects until individual maintenance schemes are designed and submitted for environmental assessment. As noted above, a search will be undertaken for other plans and projects that could have cumulative or in-combination effects in the vicinity of the proposed maintenance works on a case-by-case basis once individual maintenance schemes are designed and submitted for environmental assessment. If there is potential

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for these effects, additional consultation will be carried out with NS. However, considering the nature and scale of each of the maintenance activities and the distance between the Dornoch Firth and Morrich More SAC and the A9 Kessock Bridge, there is likely to be extremely limited potential for significant cumulative or in-combination effects due to other plans or projects.

There is some potential for cumulative or in-combination effects resulting from multiple activities carried out by BEAR due to the amount of maintenance works required on A9 Kessock Bridge over the next 10 years. However, all works will be highly localised to the bridge, which spans a very small part of the Inner Moray Firth / Beaully Firth and is located in an area of high anthropogenic activity, including marine activity associated with the Port of Inverness. Most of the works are located on or immediately below the bridge deck, which is elevated above the water. Therefore, the risk of significant cumulative noise impacts is likely to be low. Although some minor cyclic maintenance could be carried out during or close to the timing of a larger scheme, any planned larger schemes typically will be spaced out across the 10-year programme due to budget limitations and required lead-in time for tendering and mobilisation, which reduces the risk of significant cumulative or in-combination effects due to disturbance on and around the bridge. 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 construction noise and activities is also limited.

Overall, due to the nature and scale of the proposed activities, the distance between the area of works and the SAC, and the limited potential for overlap of any activities during the 10-year programme, it is highly unlikely that any of the proposed maintenance activities would result in significant cumulative or in-combination effects on the qualifying feature harbour seal within the Dornoch Firth and Morrich More SAC.

Conclusion

Upon detailed review, the majority of proposed works at A9 Kessock Bridge over the next 10 years have limited potential to result in LSE on harbour seals associated with the SAC. A few activities carry a higher risk of impacting harbour seals due to collisions with vessels 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 the Dornoch Firth and Morrich More SAC, and all conservation objectives for harbour seals with 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:

- Moray Firth SAC
 - Bottlenose dolphins
 - Subtidal sandbanks
- Moray Firth SPA
 - Non-breeding (overwintering) populations of the following bird species:
 - Common scoter
 - Eider
 - Goldeneye
 - Great northern diver
 - Long-tailed duck
 - Red-breasted merganser
 - Red-throated diver
 - Scaup
 - Shag
 - Slavonian grebe
 - Velvet scoter
 - Breeding populations of shag
- Inner Moray Firth SPA
 - Breeding populations of the following bird species:
 - Common tern
 - Osprey
 - Non-breeding (overwintering) populations of the following bird species:
 - Bar-tailed godwit
 - Cormorant
 - Curlew
 - Goldeneye
 - Goosander
 - Greylag goose
 - Oystercatcher
 - Red-breasted merganser
 - Redshank
 - Scaup
 - Teal
 - Wigeon
 - Waterfowl assemblage
- Inner Moray Firth Ramsar
 - All of the above bird species listed under Inner Moray Firth SPA
- River Moriston SAC
 - Atlantic salmon
 - FWPM
- Dornoch Firth and Morrich More SAC

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- Harbour seal

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 B, **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.

Similarly, with the proper application of the standard working practices and measures described in Stage 1 and Appendix B, it is concluded that the proposed maintenance activities **would not result in LSE and therefore would also not result in AESI on the following qualifying features:**

- Inner Moray Firth Ramsar
 - Intertidal mudflats and sandflats
 - Saltmarsh
 - Sand dunes
 - Shingle
- Cromarty Firth SPA
 - Breeding populations of the following bird species:
 - Common tern
 - Osprey
 - Non-breeding (overwintering) populations of the following bird species:
 - Bar-tailed godwit
 - Curlew
 - Dunlin
 - Greylag goose
 - Knot
 - Oystercatcher
 - Pintail
 - Red-breasted merganser
 - Redshank
 - Scaup
 - Whooper swan
 - Wigeon
 - Waterfowl assemblage
- Cromarty Firth Ramsar
 - All of the above bird species listed under Cromarty Firth SPA
 - Estuarine alder woodland
 - Intertidal mudflats and sandflats
 - Open water transition fen
 - Saltmarsh
- Moray Firth SAC
 - Subtidal sandbanks
- Dornoch Firth and Morrich More SAC
 - Atlantic salt meadows
 - Coastal dune heathland
 - Dune grassland
 - Dunes with juniper thickets
 - Estuaries
 - Glasswort and other annuals colonising mud and sand
 - Humid dune slacks
 - Intertidal mudflats and sandflats
 - Lime-deficient dune heathland with crowberry

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- Reefs
- Shifting dunes
- Shifting dunes with marram
- Subtidal sandbanks
- Otter

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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 noise, artificial lighting, and pollution from works are considered suitable to ensure that the works do not result in AESI on Moray Firth SAC, Moray Firth SPA, Inner Moray Firth SPA, Inner Moray Firth Ramsar, River Moriston SAC, and Dornoch Firth and Morrich More SAC:

Moray Firth SAC, Dornoch Firth and Morrich More SAC – bottlenose dolphins, subtidal sandbanks, harbour seal

- Boats/barges to be launched from local ports where possible to limit travel distances
- Where the use of boats or other vessels is required to carry out works, all vessels operating during works will adhere to the general principles in the 'Scottish Marine Wildlife Watching Code' and 'A Guide to Best Practice for Watching Marine Wildlife' (NS 2017), including the following measures:
 - Vessels will not approach any marine wildlife.
 - Vessels will maintain a safe distance (at least 50m, preferably more) from any marine wildlife passing through the area of works and/or access routes.
 - Vessels will avoid sudden unpredictable changes in speed, direction, and engine noise.
 - Vessels will not cut off an animal or group of animals by moving across their path and will not approach them from behind.
- Site staff will be instructed not to approach, touch, or feed any seals using the Beaully Firth haul-out site.
- Full encapsulation of working areas is required for high-risk activities, such as grit-blasting, painting, and hydro-demolition.
- If discharge of water used for hydro-demolition is required, an appropriate level of authorisation must be secured from SEPA prior to any discharge of water and all conditions of the authorisation must be adhered to during works.
- Hydro-demolition water must be appropriately treated (e.g., via Siltbuster) prior to discharge to reduce pH and suspended solids to acceptable levels (typical values are 5-9 for pH and 80-100mg/l for suspended solids).

Moray Firth SPA, Inner Moray Firth SPA/Ramsar – breeding and overwintering birds, coastal and marine habitats

- Pre-construction surveys (e.g., for breeding or overwintering birds) will be carried out prior to larger schemes with longer durations (e.g., greater than 1 month) to identify any nests or roost sites that may be affected by proposed works.
- Consultation with the Highland Raptor Study Group will be carried out prior to larger schemes with longer durations (e.g., greater than 1 month) to identify any osprey nests that may be affected by proposed works.
- Consultation with NS will be carried out prior to larger schemes with longer durations to identify any known breeding colonies of common terns within disturbance distance of works.
- Pre-construction bird surveys will be timetabled into project plans as required to allow sufficient time to identify any active nests or roost sites and install appropriate mitigation prior to works commencing (if required), which will be agreed with NS and may include:
 - Seasonal constraints on works to avoid the breeding season and/or overwintering period.
 - Timing restrictions on works to reduce the risk of effects during the bird breeding season and/or overwintering period.
 - Use of visual and/or acoustic barriers within working areas or at site compound locations.
 - Restrictions on tree felling if osprey nests are present.
 - Installation of compensatory nesting habitat for osprey such as an artificial nesting platform.

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- Where debris netting is required, it will be limited to the minimum amount required and will be installed as close to the working area as possible to reduce the risk of entanglement.
- Installation of pigeon deterrents will include the use of bird spikes, gel pods, and steel mesh rather than netting, which will reduce the risk of entanglement for birds that may roost on A9 Kessock Bridge.
- The 'Birds' Toolbox Talk will be included in the SEMP and provided to all site staff prior to works commencing.
- If access to intertidal areas and mudflats in the Inner Moray Firth / Beaully Firth is required, it will be avoided during cold weather when seven or more consecutive days of freezing conditions have been recorded, which can leave overwintering birds more vulnerable to disturbance.
- Any artificial lighting required during night works or periods of low light levels will be directed at the area of works as far as is safe and reasonably practicable. Light spillage will be reduced as much as possible (e.g., via use of shades).
- A daily cessation of noisy works (e.g., hydro-demolition) will be planned during construction to allow a quiet period each day.
- Plant, machinery and equipment fitted with effective silencers where available will be utilised for the works. Where fitted, and where permitted under Health and Safety requirements, white noise reversing alarms will be utilised during construction.
- Where possible, inherently quiet plant will be selected for construction works. Where appropriate, pumps and generators will be sound-reduced models with fitted, lined, and sealed acoustic covers.
- All plant will be operated in such a way that minimises noise emissions and be switched off when not in use.
- All ancillary plant such as generators will be positioned so as to cause minimum noise disturbance. Where deemed necessary, acoustic screens will be utilised.
- For larger schemes with longer durations, an Ecological Clerk of Works (ECoW) will attend site regularly during works to monitor sensitive ecological receptors (e.g., overwintering birds, breeding birds) and mitigation measures to reduce impacts.

River Moriston SAC – Atlantic salmon and FWPM

- Where possible, works requiring in-water access (e.g., via boats) will be programmed for June to September to avoid the salmon migration periods.
- If works requiring in-water access (e.g., via boats) are required to take place during October to March, consultation will be carried out with the Ness DSFB in these cases to identify whether additional mitigation measures would be required.
- Where possible, works requiring in-water access (e.g., via boats) will be programmed during daylight hours to reduce the need for artificial lighting near the water's surface.
- If discharge of water used for hydro-demolition is required, an appropriate level of authorisation must be secured from SEPA prior to any discharge of water and all conditions of the authorisation must be adhered to during works.
- Hydro-demolition water must be appropriately treated (e.g., via Siltbuster) prior to discharge to reduce pH and suspended solids to acceptable levels (typical values are 5-9 for pH and 80-100mg/l for suspended solids).

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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 A9 Kessock Bridge to several designated sites, advice on potential impacts of works was sought from NS to inform this assessment.

Emma Jones, Operations Officer for Coastal Infrastructure at NS, responded via email (received 25/09/2025) on the designated sites provisionally scoped into this assessment and advised that the River Moriston SAC should also be included. This advice has informed our assessment which will be submitted to Marine Directorate in support of a 10-year marine licence application. A copy of this consultation is included in Appendix A.

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 effects of a 10-year programme of works at A9 Kessock Bridge (described in Stage 1) on the qualifying features of the below European Sites, and has **concluded that the proposed activities will not result in LSE on the qualifying features of:**

- **Cromarty Firth SPA – all features**
- **Cromarty Firth Ramsar – all features**
- **Inner Moray Firth Ramsar – habitats**
- **Dornoch Firth and Morrich More SAC – all features except harbour seal**

The HRA concluded that LSE could not be ruled out for the following:

- **Moray Firth SAC – all features**
- **Moray Firth SPA – all features**
- **Inner Moray Firth SPA – birds**
- **Inner Moray Firth Ramsar – birds**
- **River Moriston SAC – all features**
- **Dornoch Firth and Morrich More SAC – harbour seal**

However, it has been concluded that the proposed works will not result in AESI on these features provided that the above mitigation measures are in place.

The assessment has considered standard working practices to comply with relevant legislation (as described in Stage 1 and Appendix B) in the above conclusion. While these standard working practices will benefit the qualifying features of the above sites, these working practices and measures are not being undertaken specifically for the qualifying interests. Instead, these working practices are required to comply with the Environmental Authorisations (Scotland) Regulations 2018 (EASR).

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Appendix A - Consultation


Pre-application consultation with NatureScot prior to submission of 10-year marine licence application for A9 Kessock Bridge:

CLC181823 - ID103052 - A9 Kessock Bridge 10-year Marine Licence - NatureScot


 informed@planning.nature.scot
 To  Carolyn Gillen
 Cc  Emma.Jones@nature.scot


 Reply
  Reply All
  Forward
 


Thu 25/09/2025 11:46

 If there are problems with how this message is displayed, click here to view it in a web browser.
 Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Our ref: CLC181823 - ID103052

Dear Carolyn

Thank you for the above consultation.

I confirm that I agree with your summary of sites to include in the HRA proforma (Table 3 in your A9 Kessock 10-YR Marine Licence HRA Scoping Notes document) and advise that you add the River Moriston SAC to the scope of your assessment. See <https://sitelink.nature.scot/site/8361> for further details.

Although the River Moriston SAC lies approximately 40km from the Kessock Bridge, the site is designated for Atlantic Salmon and fresh water pearl mussels. Atlantic salmon with connectivity to this SAC will use the River Ness to reach the sea as part of their migration so are likely to pass under the Kessock Bridge at certain times of the year.

Additional advice - biosecurity


You may be aware that Slipper limpet *Crepididula fornicata* has established in the Cromarty and Moray Firths. If any works will take place in the water (dive survey/bathymetric survey for example), consideration should be given to biosecurity measures to reduce the risk of spreading marine invasive non-native species (mNNS). This may involve employing a biosecurity plan and we have guidance on this available on our [website](#) and the Clyde Marine Partnership website. We would also advise adherence to best practice measures, such as '[check clean dry](#)'.

Feel free to get back to me if you have any queries regarding the above.

Regards

Emma

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Appendix B – 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) 7: Temporary crossings, structures, or works (SEPA, 2025).
- SEPA GBR 9: Operating vehicles, plant or machinery in or near any surface water or wetland (SEPA, 2025).
- SEPA GBR 10A: Run-off from developments built before 1 April 2007 (SEPA, 2025).
- SEPA GBR 10B: Run-off from developments built after 1 April 2007 (SEPA, 2025).
- SEPA GBR 10D: Run-off from a small construction site less than or equal to 4 hectares (SEPA, 2025).
- SEPA GBR 11: Discharge into surface water drainage system (SEPA, 2025).
- SEPA GBR 16: Direct discharge of pollutants into groundwater from construction or maintenance works (SEPA, 2025).

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 the introduction of any substance or heat to the water environment which may give rise to harm to the water environment (GBR 10A, 10B, 10D).

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, particularly for proposed in-water works or larger schemes. If surveys identify the requirement for protected species licencing, additional consultation with NS 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.

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- 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.
- 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 slipper limpet 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.