

**Delayed Office Opening
for Employee Training**

*This office will be closed from
8.45am - 11.00am on the first
Thursday of each month.*

**Transport Scotland
Buchanan House
8th Floor
58 Port Dundas Road
Glasgow
(via e-mail)**

Planning and Development
Interim Head of Service Nick Brian

Pullar House, 35 Kinnoull Street, PERTH PH1 5GD
Tel 01738 475000

Contact Callum Petrie
Direct Dial (01738 475353)
E-mail: cpetrie@pkc.gov.uk
www.pkc.gov.uk

Our Ref 17/00082/CONSUL

Your ref Killiecrankie to Glen Garry
(Project 5)

Date 23 January 2018

**The A9 Trunk Road (Killiecrankie to Glen Garry) (Trunking) Order 201 []
The A9 Trunk Road (Killiecrankie to Glen Garry) (Side Roads) Order 201 []
The A9 Trunk Road (Killiecrankie to Glen Garry) (Extinguishment of Public Rights of
Way) Order 201 []
A9 Dualling Programme: Killiecrankie to Glen Garry DMRB Stage 3 Environmental
Statement**

Thank you for consulting Perth and Kinross Council on the aforementioned Draft Road Orders and accompanying Environmental Statement (ES), dated 21 November 2017.

Please find the Council's formal response set out below, which is intentionally grouped under separate category headings, reflecting key chapter headings of the ES as follows:

FLOODING AND DRAINAGE

Comments and observations on the Flood Risk Assessment (FRA) of the ES (Appendix 11.3)

Major Watercourses:

- Significant loss of floodplain storage at 3 locations (Essangal, Allt Bhaic and River Garry Underbridges)
- Impacts of this are deemed acceptable in the FRA
 - Increased flood depths – mostly agricultural areas (low risk/impact) or of negligible amounts during design flow event only (1:200+CC)
 - Flood extents remain relatively unchanged due to topographical constraints
 - Flood frequency may increase also but limited to low risk agricultural areas
 - New A9 mainline remains flood free during design event – improvement of existing situation

- No mitigation proposed
 - Compensatory storage cannot be designed on like for like basis to offset the impacts of the design
 - Design of the compensatory storage would also negatively impact the existing, and ongoing, use of land for agricultural purposes
 - Relief culverts were considered and dismissed due to ongoing maintenance burden and blockage risk
 - Land will have to be maintained in perpetuity as flood storage, and will be returned to landowner with suitable burdens restricting development and protecting the storage. Land would still be usable for existing agricultural functions.
- The Structures and Flooding team set out that any impacts should be offset as far as possible, in line with Scottish Planning Policy (SPP (2014)); acknowledging if this has been discussed and agreed with landowners as a suitable way forward then this position is accepted as the residual impacts are determined to be low risk. *Position clarified and accepted (as per Jacobs responses dated 17/01/18)*
- The extent of the land to be protected for the purposes of flood storage must be recorded, and remain available to the Council should any issues arise in the future.

Minor Watercourses

- New replacement crossings are to be designed in line with DMRB guidance (1:100 year event plus suitable freeboard) and this is tested against the design flood event (1:200 plus climate change (CC)).
- We require new culverts to be designed to accommodate the 1:200 plus CC flow plus an additional 600mm freeboard (where this will not adversely impact existing downstream flood risk). This should be the design standard for all new crossings for the project; in line with SPP. It is noted that new crossings have been reviewed against this event to check capacity (51/53 allow the design flood to pass – although 2 do not meet this requirement – Can the 2 not meeting this requirement be clarified?).
- Side roads (unsurfaced) are only to be designed to the 1:50 year event, which is not acceptable. As above, we would expect all new crossing to be designed to 1:200 plus CC as a minimum. Can it be clarified that these are for unsurfaced private roads only? Who will be responsible for the maintenance of these culverts - landowners? They will need to be made aware of this.
- WF92 proposed diversion: More detail is required when available – must be able to confirm and demonstrate that there is no increased risk downstream (Killiecrankie).
- It is recognised from the FRA that there will be some benefits upstream of the new mainline, specifically reduced flood risk to 6 properties at Calvine and a property at Druiman.

Surface Water Drainage

- Pre-earthwork drainage – only up to 1:75 year – What about 1:200 year event (and plus CC)? – Where there is a potential flood risk to the road (i.e. at the top of cuttings) this should be designed to deal with the 1:200 year plus CC rainfall event. *Clarified and accepted (as per Jacobs responses dated 17/01/18)*
- Road Drainage – only to be designed to ensure no overtopping of MH's/flooding of carriageway during 1:5 year rainfall event. What consideration has been given to larger rainfall events, up to 1:200 year plus CC – overland flow paths etc.?
- SUDS –
 - 22 SUDS features (basins/ponds/wetlands) – will the ownership/maintenance of these remain with Transport Scotland?
 - Sized to 1:200 plus CC rainfall event + 300mm freeboard – can you confirm if discharge is to be restricted to the 1:2 year greenfield rate across all return periods? *Clarified and accepted (as per Jacobs responses dated 17/01/18)*
 - 7 SUDS basins are situated within the design fluvial flood envelope, including 4 within the 1:30 year floodplain.
 - 1 basin (J2) is inundated during the 1:200 plus CC event (water level predicted to be 2.5m above basin bund height) – this is a concern as this will impact the roads drainage. We require more information for the justification of this basin. Have the impacts been assessed? Have all options to relocate/defend this basin been explored?
 - 2 other basins (H+E1) have limited freeboard above the 1:200 plus CC event so may also be at risk (<50mm).
 - The detailed design of the SUDS features will be required for review when this becomes available.

The Council Structures and Flooding team additionally recommend that appropriate cognisance is given to ***Perth and Kinross Council - Flooding and Flood Risk Guidance Document (2014)***

On the basis of the aforementioned, the Council wish to register a conditional objection to the current proposals on Flooding and Drainage grounds, subject to the review of additional information and justification requested in the points set out.

ECOLOGY AND NATURE CONSERVATION

In reviewing Chapter 12 of the ES, the Councils Biodiversity officer was satisfied and content that the Ecology and Nature Conservation section identifies all possible impacts on wildlife found in the area and proposes suitable mitigation measures as appropriate. It was acknowledged that a certain amount of disturbance is inevitable, but the CEMP will include an Ecological Management Plan, with a team of independently appointed Ecologists available to ensure compliance.

Measures to ensure safe crossing points for mammals are included in the road design, which is welcomed.

LANDSCAPE AND VISUAL

Non-Motorised Users (excluding those within the CNPA area)

- Paths 116, 117 and CP10 Ch 9200-9700 .There is some concern about the length of the diversion via the Pitaldonich underbridge. The existing at-grade crossing at Invervack Farm will be stopped up but users may be tempted to shortcut the distance by crossing the road. If so and depending on the likely volume, a basic underpass may be desirable.
- Paths CP 11&12 and 120&124 Ch 11000-11500 –An option to cross on the north side of the old A9 Garry Underbridge should be considered.

Landscape and Visual Assessment

- Ch 0000 – 1200. Given the sensitivity around Killiekrankie, it would preferable to widen on the northbound side of the existing road. This would involve rock cutting, which would result in steeper landform and less land take. The proposals to widen on the southbound side of this section relies on earth embankments and loss of more land and existing trees, which will detract from the setting of Killiekrankie.
- Ch 1900 – 3300 southbound widening may still be an option along this section if the loss of trees and earthworks associated with the northbound widening are considered more detrimental overall.
- Ch 2800-3200 – the inclusion of tree planting on the northbound side would be preferable to integrate the earthworks and slip road as well as compensate for the loss of the trees (left of photo) on this section, which could be avoided through southbound widening per point above.



- Ch 3800 - Aldclune Junction – the Council are still concerned that this important junction for Blair Atholl could lack character and an appropriate transition to the visual scale of the B8079 as the existing junction does.



The B8079 is considered to characterise a typical Perthshire rural road, with stone walling and field boundary trees etc. and the engineering and landscape treatment of the new junction will require a sensitive approach to help settle it into the landscape.



- Ch 11600 House of Bruar Junction – It would be beneficial to have the opportunity to see and collectively agree upon the detailed design of this junction and the earthworks as part of the next stage. It is important the transition from the dual carriageway into the local rural road network is visually appropriate.
- Ch12200 – if there is an intention to carefully shape the earthworks to help retain and integrate the rocky knoll feature on the south side of the road, it would be useful to state this on the drawings.



- Ch13600-14800 –a split carriageway here; retaining the existing carriageway for north bound traffic would fit the landscape more successfully and reduce the loss of the established landscaping and rock cuttings.

Overall, the Councils Community Greenspace Team recommends that the Council have a continual involvement in the detailed design going forward and during construction phases in order to ensure the quality of the detailing is maintained. In addition, it is recommended that the Council are informed of and given the remit to approve any landscape elements and areas, which are ultimately intended to be adopted by the Council. It would also be beneficial if plans and indicative quantities of finishes and structures could be provided for information and review.

CULTURAL HERITAGE

Listed Buildings and Conservation Areas

Overall, 71 listed buildings and 1 Conservation Area are identified in the study area.

Table 15.5 notes the potential impacts on listed buildings as:

- A moderate construction impact on one building;
- A slight construction impact on 19 buildings;
- A slight operation impact on 10 buildings.

Mitigation items P05-CH7 and P05-CH8 are noted in relation to the potential impact on category B listed Shierglas Farmhouse (asset no.365).

No mitigations measures are proposed in relation to tree removal along the existing A9 at asset no. 402 (Blair Atholl Conservation Area). The impact assessment suggests that the setting of the Conservation Area and Garryside Houses (asset no. 386) would be adversely affected.

The proposed construction works are in very close proximity to Urrard House Walled Garden, which is category B listed along with Urrard House and ancillary buildings (asset 341). The impact significance is noted as slight and temporary. While it is not possible to assess the full impact on the basis of the information provided, the Councils view at this stage is that the proposed work in this location would result in a permanent visual intrusion on the setting of the walled garden, as the bund and mature tree belt, which currently screen the A9 from this site would be lost. Mitigation item P05-CH11 is noted in relation to protection of the structure during construction.

The information provided is not deemed adequate to make a full assessment of the potential impacts on listed buildings. Where a potential direct adverse impact of a slight or moderate significance is noted in relation to a listed building, full details should be provided showing the distance of the proposed development from the asset, existing and proposed site levels, proposed landscaping and/ or screening and full protection measures during construction as appropriate.

15.2.3 Value of Category C Listed Buildings

Perth and Kinross Heritage Trust (PKHT) continues to question the assessing of C listed buildings as of low value. At Stage 2, this was queried as C listed buildings are considered to be of a higher value than other assets in this category (e.g. modern buildings, very common archaeological sites). An example from the ES would be the Allt Andeir Bridge, a well preserved Wade Bridge that is classed as of low value yet the military road that it carries over the Allt Andeir burn is classed as of medium value.

Archaeology

PKHT has reviewed Chapter 15 Cultural Heritage of the ES, and its associated Figures and Appendices. Where relevant and referenced by Chapter 15, a review of Chapter 3 Alternatives Considered, Chapter 4 Iterative Design Development, Chapter 13 Landscape and Chapter 14 Visual has been carried out. A site visit to the Inventory Battlefield was made in December 2017. For the full unedited response, please see Appendix 1 below.

Whilst PKHT concurs with the majority of the assessment presented in the ES, we are concerned that the impact on the Inventory Battlefield has not been explored adequately. The information presented in the ES is not comprehensive enough to allow for PKHT to reach a conclusion as to whether widening the northbound or the southbound carriageway between ch700 and ch3890 has a similar impact as stated in Section 15.4.51 of the ES. Further, the ES does not demonstrate how the new road infrastructure has been kept to a minimum within the Inventory Battlefield to reduce its impact.

On these grounds, PKHT raises an objection to the proposed scheme between Killiecrankie and Aldclune (ch700 to ch3890) as set out in the A9 Trunk Road (Killiecrankie to Glen Garry) Order 201. In order to resolve this objection and improve outcomes for heritage assets affected, four recommendations plus comments on the ES are provided:

Recommendations

- 1) An additional assessment of the Inventory Battlefield is required to establish the impact on its special qualities and key landscape characteristics and to enable an unequivocal comparison of the impact of widening the northbound or the southbound carriageway in this area. This could include topographical survey, visual impact assessment and additional metal detecting and geophysical survey. Scope should be provided for the trial investigation of significant discoveries.
- 2) An addendum to the ES is required to include the results of additional assessment and to demonstrate how the impact of road infrastructure has been kept to a minimum within the Inventory Battlefield.
- 3) A commitment to the production of a Battlefield Conservation Plan for Killiecrankie. Baseline data presented in the ES, any further assessment and subsequent archaeological work should feed into a Battlefield Conservation Plan to ensure Mitigation Item P05-CH15 is achieved in partnership with the local community, HES, the National Trust for Scotland and PKHT.
- 4) Section 15.5.17 of the ES states PKHT will carry out a curatorial role in approving for archaeological work. PKHT has not been approached by Transport Scotland regarding any agreement or arrangements to fund this work. This situation requires resolving and formalising appropriately.

Comments on the ES

15.2.5 Lack of visual impact assessment for the Inventory Battlefield

Chapter 14 has considered the visual impact on current settlements within the battlefield. Visual impact on the key landscape characteristics and special qualities of the battlefield has not been assessed.

15.2.9 DMRB Stage 3 assessment of potential impacts on the Inventory Battlefield

The ES states 'mitigation was developed that sought to avoid impacts altogether' but does not expand on this basic statement other than giving two short examples. If Design Principle H1 for avoidance has been followed, it would be useful to show how for each element of new road infrastructure the impact on the Inventory Battlefield has been considered.

15.2.10 – 11 Limitations to the assessment

PKHT considers the assessment of the Inventory Battlefield within the 200m study area to have had limitations that are not discussed in the ES: the lack of topographical study of battlefield terrain; the partial coverage of geophysical survey; and the inconsistency of the methodology of the metal detecting survey. It is understood that the application of DMRB in Scotland does not afford intrusive archaeological investigation at Stage 3 however given the significance of the battlefield, and that the geophysical survey suggests the possibility of grave-pits, it is suggested there was a strong case for investigating such discoveries at Stage 3 to inform decision making.

15.3.4 – 15.3.13 Assessment of value of Archaeological Remains

There are discrepancies between the values assigned in the ES and Appendix 15.1 Cultural Heritage Baseline Information, for example, heritage asset 344 Roan Ruairidh Redoubt is given a low value in the ES, but medium value in the summary section of the Appendix. The situation is reversed for heritage asset 346 Croftcarnoch Redoubt with a medium value given in the ES and a low value given in the summary section of the Appendix.

15.3.14 / Fig 15.3 Areas of potential unknown archaeological remains

The 200m study area on Figure 15.3 has been colour-coded as having 'high' or 'low' potential for the presence of unknown archaeological remains. This includes a blanket approach to categorising areas of woodland as of low potential, including within the Inventory Battlefield, where archaeological remains associated with the battle are likely to be present. To accurately assess archaeological potential, it is suggested the characteristics of each parcel of land are considered (e.g. topography, historic landuse, current landuse, type of archaeology that may be encountered). The ES does not present such supporting information.

15.3.15 – 15.3.25 Assessment of value of Historic Buildings

Heritage asset 484 Old Bridge over Allt Andeir is assessed as of low value. PKHT disagrees with this assessment – see comments above (15.2.3).

15.3.26 – 15.3.44 *Assessment of value of Battlefield of Killiecrankie*

There are six issues with this section:

1) The metal detecting survey identified two concentrations of finds to the north of the A9 and the ES suggests these concentrations confirms 'the documentary evidence that the main body of fighting associated with the battle took place at these locations'. However the metal detecting survey was not uniform in its approach – a number of fields within the area recognised as the core area of the battlefield were not surveyed and the methodology employed was not uniform across the areas that were surveyed. These limitations are not discussed in the ES.

2) Geophysical surveys were carried out in 5 parcels (fields) of the battlefield. This included the fields to the south of the A9 between at Balchroic (Parcel 3) where the archaeological geophysicist interpreted a series of pits as possible burial pits associated with the battle. This interpretation is not explored adequately in the ES with no mention of the pits as possible graves in either the ES or Appendix 15.1. As per comments under 15.2.10-11, such potentially significant discoveries should have been investigated by archaeological excavation.

3) The site of Roan Ruairrdh and its locality (now the site of Urrard House and steading) is recognised in the ES as likely to have seen significant close range combat. The Battlefield Inventory states there is the potential for human remains to survive within this area. The ES does not discuss the potential for discovery and disturbance of human remains and this is considered a significant omission. Further much of this area has been classed as of 'low archaeological potential' (Figure 15.3) due to its current land use.

4) It would be useful to have topographic survey data illustrating the terrain of the battlefield including the extent of the key landscape characteristic of the terraces of the southern slopes of Creag Eallaich. The geophysical survey report notes in passing terraces to the south of the A9 but the exact location of the terraces (both to the north and south of the A9) is not clear from the ES (e.g. they are presented with a generalised stipple on Figure 15.4). It is not clear from the ES what key landscape characteristics will be removed by the scheme proposed.

5) The site of Lagnabuaig (to the north of Tomb Clavers) is included in the Battlefield Inventory as a settlement that may have existed during the battle. It is not considered adequately by the ES.

6) There appears to be a discrepancy with assigning of values for the special qualities and the key landscape characteristics that make up the Inventory Battlefield. In section 15.4.14, the ES states special qualities and key landscape characteristics are assigned a high value yet the same sites (e.g. Assets 344 and 346 discussed above) are assigned low and medium values elsewhere in the ES.

15.4 Potential Impacts - General

Whilst in agreement with the assessment of the majority of potential impacts both during construction and operation, PKHT have concerns that the iterative design process has not fully taken the Inventory Battlefield into account. Section 4.1.4 of Chapter 4 Iterative Design Development includes Cultural Heritage Assets' as one of a suite of Key Environmental Constraints and certain measures are given, for example, the need for a sensitive design for the new Essangal Bridge. Yet the rationale for the location of SUDS, a layby, haulage routes, earthworks and service roads within the Inventory Battlefield is not discussed in detail with the result it is unclear as to whether PKHT's Stage 2 recommendation to keep ground breaking works to a minimum in the Inventory Battlefield has been taken into account. It is disappointing to note that the designation of the battlefield, and what this designation means, is not mentioned in Chapter 4 (e.g. compare with the weight given to the River Tay SAC designation).

The former settlement of Lagnabuaig is missing from consideration in 15.4 and Appendix 15.1.

15.4.13 Potential impact on Urrard House Walled Garden (Asset 343)

PKHT does not agree with the assessment of impact magnitude and significance on this B-listed structure. Its setting, already adversely affected by its proximity to the A9, will be further impaired.

15.4.15 / 15.4.36 Potential impact on Inventory Battlefield key landscape characteristics

The two cross-sections provided in Chapter 13 do not provide enough detail to assess impact on battlefield terrain. See point 4) above in comments relating to 15.3.26-44.

15.4.24 / 15.4.45-46 Potential impact on terraces to the south of Mains of Orchil and the level ground to the south of the A9

Contrary to the ES, the geophysical report notes terraces to the south of the A9. Lack of topographical survey to locate the key landscape characteristics means the impact on the battlefield terrain cannot be assessed. See point 4) above in comments relating to 15.3.26-44.

15.4.51 Overall potential impacts on the Inventory Battlefield

The Stage 2 Environmental Assessment and the ES have not demonstrated whether widening the northbound carriageway would have the same impact as widening the southbound carriageway. There is nothing in Chapter 3 Alternatives Considered that refers specifically to the Inventory Battlefield other than it was an environmental constraint that was 'considered'. No detail is provided on how it was considered.

15.4.53 Impact on the amenity value of the Inventory Battlefield

PKHT disagrees with the statement that the amenity value of the battlefield will not be affected. Temporary noise and visual intrusion during construction and the increased infrastructure that results from dualling, for example at Tomb Clavers, will detract from the amenity value of the battlefield.

15.5.3 – 4 *Embedded Mitigation*

Comments above address the lack of clarity as to how the proposed scheme has sought to avoid impact through design on the Inventory Battlefield. Further the proposals presented in this section for control of planting and opening up of views across the battlefield do not appear to be supported by Figures 13.5a-c, where replacement and new woodland is proposed e.g. to the north of Urrard Steading, to the north east of Urrard House and around the SUDS at ch1700.

15.5.5 - 18 *Standard and specific mitigation*

PKHT is in agreement with the standard and specific mitigation presented in the ES and notes that detailed mitigation strategies will be presented in a Written Scheme of Investigation (WSI). The ES also states the WSI will be approved by both Transport Scotland's Historic Environment Advisor **and** PKHT. It is important to note PKHT has not been approached by Transport Scotland to request we fulfil this role, and that any such request would have to be agreed by our Board of Trustees.

15.5.19 *Interpretation and understanding of the Inventory Battlefield*

PKHT would welcome the opportunity to increase the understanding and appreciation of the battlefield however the impact on the battlefield requires to be fully assessed in the first instance. Subsequently, and in line with the Perth and Kinross Local Development Plan Policy HE5 for the Protection, Promotion and Interpretation of Historic Battlefields, a Battlefield Conservation Plan would be an ideal vehicle for this.

On the basis of the aforementioned, the Council and PKHT wish to register a conditional objection to the current proposals on Cultural Heritage grounds.

ENVIRONMENTAL HEALTH (including air quality, noise and pollution)

The Council Environmental Health team have concerns regarding the threshold for significance and mitigation identified as set out in the ES:

Noise (assessment date -08/1/18)

Consultants Jacobs have designated a threshold of slight/moderate in terms of PAN1/2011 TAN and an absolute level of LA_{10 18 hour} 59.5dB or above at any noise sensitive receptor as the threshold for significant effect and thus provision of mitigation. This significance is ascertained by taking the sensitivity of the receptor, for example high for residential and comparing it to the change in magnitude of the noise as shown below.

Magnitude of Impact	Level of Significance Relative to Sensitivity of Receptor		
	Low	Medium	High
Major	Slight/Moderate	Moderate/Large	Large/Very Large
Moderate	Slight	Moderate	Moderate/Large
Minor	Neutral/Slight	Slight	Slight/Moderate
Negligible	Neutral/Slight	Neutral/Slight	Slight
No change	Neutral	Neutral	Neutral

The biggest significance of effect within the sample receptors was at Clunes Cottage, which sees an increase of 4.2dBA at ground floor level between the Do Minimum and Do Something Short Term Scenarios. This is a moderate magnitude increase which translates as a moderate/large significance.

Referring to large significance, TAN states “*These effects are likely to be important considerations but where mitigation may be effectively employed such that resultant adverse effects are likely to have a Moderate or Slight significance*”. There are no minimum absolute levels set in the TAN to achieve large significance.

Whilst recognising that at low absolute levels, this change in noise may not have as large an impact when considered qualitatively, many of the properties considered however are not particularly low for example Clunes Cottage is predicted to have a L_{A10 18hour} of 55.2dB, which is equivalent to a façade level L_{Aeq 16hour} of 53.2dBA of free-field level of 51.2dBA.

The aforementioned 59.5dBA was chosen as it relates to World Health Organisation (WHO) Guidelines on Community Noise recommendations, which state that an outdoor level of 55dBA should protect the majority of people being seriously annoyed by noise. The figure for avoidance of moderate annoyance is 50dBA

This is then converted by adding +2dBA to convert to L_{A10} then +2.5dBA to convert to façade level. It is my assertion that whilst 55dBA is appropriate for new sensitive receptors being introduced to an existing noise source, for existing sensitive receptors, a figure of 50dBA is more appropriate, which converts to 54.5dBA as a L_{A10} .

This would mean further mitigation being required, particularly at Clunes Cottage.

There is also the issue of night time noise, which the target has been set as $L_{\text{night, outside}}$ 55dBA, which ties in with the interim night time noise limits set by WHO. The long term target is $L_{\text{night, outside}}$ 40dBA and PAN 1/2011 state a target of 45dBA to tie in with the WHO guidelines on community noise value to prevent sleep disturbance of 30dBA internally.

It is therefore felt that noise sensitive receptors other than those with noise levels above $L_{\text{night, outside}}$ 55dBA should be considered. It has not been possible to do this as no night noise appendix seems to have been provided.

Air Quality and Dust – Assessment date -17/01/18)

There is no objection to the generalities of the assessment undertaken and the associated mitigation proposals, but it is advised that the undernoted recommendations are incorporated with the finalised recommendations and decision.

Construction Stages

Dust

A construction dust assessment was carried out, using risk-based approach, as set out in DMRB HA207/07. The report states that there are 82 residential properties and 2 schools within the 200m distance that dust has the potential to be a nuisance.

The report states that the generation of dust at the construction stage will be short-term and with standard mitigation control will not be significant.

Air Quality

The report states that there is not predicated to be a significant impact on local air quality concentrations as a result of construction traffic.

Operational

The scheme once operational is predicted to lead to some increases and decreases in annual mean NO₂, PM₁₀ and PM_{2.5} at human exposure receptors assessed. These increases do not exceed the annual mean air quality objectives for these pollutants; therefore no significant residual impacts are predicted.

Recommendations

It is recommended that prior to the commencement of the development, the associated Construction Environment Management Plan, detailing the prevention, control and mitigation measures for dust and noise control, including specific measures for environmental monitoring during construction, shall be submitted to Perth and Kinross Council Environmental Health Section for written approval, with agreed recommendations adopted thereafter.

It is additionally recommend that noisy construction working should be limited to Monday to Friday 07.00 to 19.00, Saturday 08.00 to 13.00 with no noisy working on a Sunday.

SUMMARY

In summary, it is generally acknowledged that considerable work has been undertaken in relation to the production of the Environmental Statement and through following the DMRB process, informing the Environmental Impact Assessment for the proposed Killiecrankie to Glen Garry section of the A9 Dualling Programme. At this crucial stage however, key areas of the assessment including elements in flooding and drainage, landscape & visual, environmental health and cultural heritage in particular are considered to be either lacking or requiring further consideration. On this basis, it is considered appropriate to request additional information and clarification is sought and provided to ensure that the interests and remit of both the Council and PKHT are adequately covered and addressed in relation to site specific environmental constraints and impacts. A conditional objection position is therefore recommended at this time, subject to further consideration, information, and associated clarification being provided in relation to the actionable points set out in this response.

Yours sincerely

Callum Petrie

Development Management
Planning & Development
The Environment Service
Perth and Kinross Council