

KilliecrAnkie1689

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FEEDBACK ON REFINED DESIGN, KILLIECRANKIE A9

In your opinion, are the design refinements presented today an improvement compared to the published design?

These refinements make a bad plan a lot worse, in our opinion. The scheme that was published in November 2017 is a product of systemic failings. The faults are so fundamental that these modifications highlight the failings and, worse, introduce new problems.

Earlier omissions and failures that were evident at the end of Stage 2 and developed in Stage 3 are now glaring in the Refined Design with the removal of embedded mitigation. As a thorough analysis was not done at the stage when various route options were available, you are unable to provide any meaningful comparisons of this route with any other. The earlier evaluations that examined a long geographical expanse encompassing an area beyond Killiecrankie are now irrelevant. The methodology to assess noise looks too suspect to go unchallenged.

Earlier advice from Historic Environment Scotland about earthworks, on which the design is predicated, was ignored. In attempting now to address the question of earthworks, the Refined Design reduces the imprint on the battlefield. That refinement immediately undermines the very rationale for choosing the northbound expansion route and triggers a series of worrying consequences.

The Refined Design includes changes that we had previously been told were not possible because such changes would compromise the scheme.

Not surprisingly our earlier concerns about the integrity of the process are now heightened.

No figures were available at the public information event to support the claim that the refinements will not alter any of the impact assessments stated in the Environmental Statement. We still await evidence to substantiate the claim and have ordered our feedback by topic (rather than refinement) to try to show what has informed our opinions.

Cost

The planned alignment was chosen because of cost benefits that would accrue from using large amounts of excess infill. The amount of infill required has now been reduced by a third so presumably the cost benefits have shrunk. No data on cost was available at the information event in Killiecrankie.

At Stage 2 the estimated cost for this section of road was between £222.5m and £339.7 million. At that time, the estimated cost of northbound expansion (from the tie-in to the existing dual carriage to the Glen Giraig underpass) was approximately £30m lower than the cost of widening on the southbound carriageway.

Visual / landscape

Removing the visual mitigation that was embedded from an early stage is significant. It has implications for the historic environment and for the landscape. This topic is only concerned with aesthetics.

Removal of the wide embankments will have an adverse effect on the scenic vista. According to the Environmental Statement, this geographical area has been assessed as high value for quality of landscape, scenery, rarity, cultural interest and recreation. In earlier planning stages and repeated in the Environment Statement, grading out was considered one of the best ways to retain the key landscape characteristics within an area that has to meet the demands of the Cairngorms National Park and Loch Tummel National Scenic Area.

In reducing the imprint, the gradient of the embankment switches from gentle to steep. That not only fails to protect the prized landscape qualities but also accentuates the new road infrastructure and thus worsens the visual impact.

The Environmental Statement identifies the existing A9 road as the only negative character attribute in the landscape in the Killiecrankie area. Emphasising the new and bigger road infrastructure with unnaturally steep embankments in an elevated location must exacerbate the situation.

In the area that starts at the Old Faskally underbridge and runs to just beyond Blair Atholl, the Environmental Statement rates the landscape/visual impact as adversely Moderate/Substantial in the first year of the new road's opening. That was when it

was designed with gentle, mitigating, embankments. As the Refined Design steepens the embankment – in some parts dramatically – all the way from the Girnaig to Aldclune, the impact must be significantly more adverse.

Of course, the methodology that has been employed to assess visual impact may rescue the plan, again, from an inconvenient detail. We noted that Stage 2 assessments managed to hide the fact that northbound widening would remove virtually all the roadside tree cover that exists in Killiecrankie. Perhaps you are again relying on assessing a long section of the road to arrive at an ‘average’ assessment label for each short component area. If so, this latest exercise proves how misleading or negligent it is not to measure the impact on the Killiecrankie battlefield area as a single, separate unit and make that assessment known to all interested parties.

Another big change to the visual impact will be the removal of the proposed bund and the construction of 2 separate stone walls on the northbound verge. That removes the opportunity for tree planting and sharpens the profile of the new construction in the landform. The stone walls are not located where the bund was going to be. The gap between the walls is at an area that would have been obscured by the bund in the previous plan but it offers the road user an open view across the field. We understand that this is to provide a high quality visual experience for travellers. At 70mph drivers will get a 7 second glimpse of the attractive view.

Meanwhile, residents who overlook the road and who already bear the brunt of the adverse impact because of the changed landform at Aldclune, the loss of mature woodland around the Girnaig and Chluain, the loss of trees around Urrard House and along the verge of the existing road plus the loss of the plantation at Aldclune junction will overlook highly prominent and unmitigated road infrastructure.

In view of the fact that the Refined Design only relates to Killiecrankie, we would expect proper visual/landscape assessments to be done so that residents and the statutory bodies who are responsible for protection of the landscape understand the impact.

The Refined Design will change the look of the road and its visual impact so radically that we would expect the proper assessment to be made available to all organisations responsible for tourism.

Noise

The loss of a replacement bund must make a difference to noise in Killiecrankie. We note that you say that the noise will remain within the Environmental Statement assessments. We have already expressed scepticism that the noise mitigation offered by the replacement bund would match the level given by the existing bund.

We were informed earlier that the bund was included in the noise modelling used at Killiecrankie. You have not explained to what extent the noise attenuation will be reduced by not having a bund nor the noise impact on those who previously were protected by the existing bund.

Stone walls reflect noise. The bund would have absorbed noise. You have not explained how you have calculated the extent that noise will be reflected nor how dwellings overlooking the road will be affected by this change in noise mitigation.

According to the Environmental Statement, earthworks offer noise attenuation. Earthworks of the published scheme were included within the 3D noise model. You have not explained to what extent the replacement of wide embankments with steep slopes will increase noise levels for the entire Killiecrankie community.

In approaching the slip-road at the Aldclune junction, vehicles need to slow down and change gear in anticipation of coming off the main road. This creates louder noises of a chaotic nature. It is a source of extra disturbance for those within hearing distance. The slip road has been shortened because the anticipated speed of traffic using it will be slower than originally calculated. The deceleration required by vehicles wanting to leave the A9 may need to start earlier or be more rapid. In any case it would start at the part in the road where the existing bund is and where the replacement bund would have been. You have not explained if this scenario has been factored into the noise impact assessment.

The same applies to vehicles using the proposed south-bound lay-by. The noise of vehicles decelerating to enter the lay-by and accelerating to re-join the road will no longer be mitigated by a replacement bund. You have not explained how this has been assessed.

We note that this source of noise on the existing northbound lay-by is mitigated currently by the existing bund where Low Noise Road Surface (LNRS) is already in use. Creating a northbound lay-by in the vicinity of the Girnaig will introduce an additional source of noise.

On re-reading how noise modelling was applied at Killiecrankie in the Environmental Statement, we note that you tested actual, measured noise levels at 11 sample points against model-predicted noise levels at the same locations. You were satisfied that results showed that “at nine of the locations there is a reasonably good correlation” of a difference of less than 2dB [Chapter 17.3.6 and Table 17.10] In fact, only four of the 11 locations showed a difference of 2dB or less.

We do not understand how you can claim a “reasonably good correlation”.

We also note the explanations given for calculations at two locations where the correlations were poor. In one case, a dense line of trees provided unexpected noise attenuation. This suggests that the noise modelling does not factor in noise

attenuation from trees or the impact caused by their removal. In the other instance, the poor correlation was explained by garden structures providing some noise screening. We have seen diagrams of only two dwellings used in noise modelling. One of the diagrams included a structure that was no longer present and omitted two structures that did exist. This suggests that maps used for noise modelling are not up-to-date.

As we are not confident about the Environmental Statement's noise statistics nor have any data about the amount of noise attenuation that will be lost with the removal of the replacement bund and reduction in earthworks, the whole question of noise impact is baffling. Extending the use of LNRS for the whole stretch rather than restricting it to the part where it already exists is insufficient comfort. To regain credibility, a noise impact assessment for the Refined Design is required for the Killiecrankie area.

We understand that the future road operator has obligations relating to noise. If so, such an organisation would require credible noise assessments now.

SuDS

When residents asked about removing or reducing SuDS on the battlefield, we were told that the locations were "optimal" and that it is a requirement to have three separate drainage catchments through the Killiecrankie section. In a letter of July 2017, Jacobs wrote, "If any of the SuDS ponds were to be located elsewhere this would be to the detriment of the design and result in greater environmental impacts to the surrounding area."

HES complained about the location of SuDS ponds and asked for them to be reduced in scale or removed from within the Inventory boundary. One basin has been removed and another – still within the Inventory boundary -- has had its capacity doubled. We understand that this arrangement is more difficult to maintain but "does not compromise road safety".

We must deduce, however, that the Refined Design for drainage is sub-optimal, detrimental to the design and results in greater environmental impacts to the surrounding area.

Lay-bys

The fact that lay-bys remain in the Refined Design in spite of requests from HES for their removal is a disappointment but not a surprise. It only confirms what we understood at the end of Stage 2 when it was revealed that lay-bys were considered but not assessed at that early stage. It is now apparent to all that the infill design had a bonus of being able to accommodate lay-bys. The closure of a northbound lay-by between Pitlochry and Killiecrankie and its relocation at Killiecrankie was an integral part of the design for Killiecrankie before the public or HES were informed.

The first occasion that residents had to object formally to lay-bys was when the Stage 3 design was finalised.

Had designers wished to respect the historic environment, they would have acknowledged that upgrading the road on the battlefield was an opportunity to enhance the site by removing the existing lay-by. Instead they made the situation worse by adding a new one. The siting of lay-bys is an indictment of Transport Scotland's attitude to the historic environment and those who seek to protect it.

Battlefield

In spite of HES's warning about the use of significant earthworks, the route option that was chosen at the end of Stage 2 was predicated on using earthworks to build up the new infrastructure to the level of the existing road. Even at Stage 2 it incorporated extra earthworks as embedded landscape mitigation. Finally, a replacement bund was planned to provide noise attenuation for residents. In total, this amounts to a disastrous design flaw that has been evident for years.

Changes to earthworks will undermine the design, reduce noise attenuation and have an adverse impact on the landscape. Yet when HES asked in its objection to the published design for a reduction in the imprint, those considerations went by the board in an effort to appear to be protecting the historic environment.

However, there is now a more adverse impact on the historic environment. The road will become highly prominent. The Environmental Statement already recognised the severance of the area around Raon Ruairidh Redoubt from the area to the south. The Refined Design will make the road extremely conspicuous all the way from the Girnaig to Aldclune, reinforcing strongly the severance the entire length of the core of the battlefield.

We continue to believe that the path that the new road will follow is the most important part of the battlefield. Nothing in the recent archaeological surveys has caused any change to our interpretation of battle events nor to the narrative in the Inventory of Historic Battlefields. The recent results have failed to strengthen the assertion in the Environmental Statement that "it has been clearly established that the main body of fighting took place to the north of the A9". We continue to disagree with that assertion.

The 5 historic assets that we have identified in the path of the new infrastructure will still be damaged if not destroyed.

- **Lagnabuaig Settlement and Redoubt.** We note that Jacobs continues to dismiss this from consideration because excavations done in 2003 found evidence of a barn used in the 19th century there. According to the Inventory,

it is possible that some buildings of Lagnabuaig were used as sniping positions. As the Lidar (Light Detection and Ranging) data shows, the Lagnabuaig area was heavily disturbed when the A9 was originally built. This should serve as a warning of damage foretold.

- **The Memorial Cairn**, sometimes called Tomb Clavers. The Glen Girnaig underpass will be reduced a little in size as the shorter slip road for the junction will now start after the bridge. The steeper embankments will have a more adverse impact on the character of the place where commemoration services are held. We understand the importance of Low Noise Road Surface (LNRS) in noise mitigation. It is hard to understand how the removal of the replacement bund will not have an adverse impact on noise when taking into account that LNRS is already in place from ch2298 to ch2622 on both existing carriageways near the Memorial Cairn.
- **Raon Ruairidh Settlement and Redoubt**. The removal of the bund and creation of steep embankments will release a ribbon of land approximately 22m wide that would otherwise be swallowed by the road scheme. This refinement belatedly acknowledges the importance of the key location in the battle. The reinforced sense of severance is unacceptable at the heart of the battlefield.
- **B-listed Garden and Wall at Urrard**. The bottom of the newly proposed steep embankment will be a couple of metres from the wall. It is hard to see how Perth and Kinross Council can change its view that the proposed work will result in a permanent visual intrusion on the setting of the walled garden.
- **The stepped terraces and terrain alongside the northbound carriageway of the A9 between the Garden Wall and the Allt Girnaig**. Our current understanding of the choreography of the battle has been strengthened by the data now available online. This is the pivotal area of the battlefield where the outcome was decided. The design refinements will change the topography and worsen the impact on the key landscape, affecting the integrity and legibility of this asset because the feature will be obliterated.

Omissions

The Refined Design only addresses the size of the imprint. The DMRB process facilitates a biased approach. Consequently it was possible to ignore the question of protecting the battlefield and the concerns of the Killiecrankie community while developing a particular route. Having committed to a particular route option years ago without completing all the studies necessary to inform decisions, the Refined Design cannot fill the gaps.

Consequently, we note that there has been no attempt:

- to consider whether the overall alignment within the Inventory boundary is the most appropriate;

- to identify ways to reduce or avoid proposed works that would adversely affect the special qualities (archaeological and physical remains) and key landscape characteristics (topographic features) of the nationally important heritage asset;
- to enable an unequivocal comparison of the impact of widening the northbound or the southbound carriageway;
- to demonstrate how the road infrastructure has been kept to a minimum within the battlefield.

Conclusion

The ill conceived Stage 3 design has been 'refined' into an incoherent hodgepodge.

When the choice of route was made years ago, it was justified because of cost, balance of earthworks and ease of construction. The Refined Design dilutes these so much that only the ease of construction argument is left.

That short term convenience should dictate how the road is widened demonstrates that no lessons have been learned from the original mistakes that were made in the 1970s when the existing road was constructed. We are now expected to be more enlightened. We do not wish our legacy to be that the name Killiecrankie is synonymous with a ruined heritage site.

We note that the Refined Design achieves a couple of changes that were earlier deemed unachievable. It proves that deviations, departures and derogations can be usefully employed to ensure a better balance of competing interests.

In moving the Aldclune junction slip road beyond the Glen Girmaig Underpass, it must now be possible to consider widening on the southbound carriageway to accommodate a crossover before the underpass. This option was not previously available. This would also give an opportunity to 'hide' the new infrastructure in the landform, retain the trees and existing acoustic bund, protect the core of the battlefield, prevent further damage of the listed Garden Wall at Urrard House, remove the laybys from the battlefield, avoid building an underbridge within a Special Area of Conservation, maintain the character of the commemorative area around Memorial Cairn and help safeguard tourism in the area.