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**A9 dualling –**  
**Pass of Birnam to Tay Crossing**  
**Tay Crossing to Ballinluig**

**Submission from Dunkeld and Birnam Community Council.**

**Introduction**

Transport Scotland has sought views on the proposed design and junction options on the above routes, specifically in relation to:

- Local information and constraints that the community think may be important for Transport Scotland to be aware of;
- How the junction options will affect the community and environment;
- Other options that the community suggest be considered.

Following Transport Scotland and Jacobs' public meeting with the community on 8<sup>th</sup> February 2016, the Dunkeld and Birnam Community Council agreed to submit a response. A working group with representatives of the community along this section of the route have informed this submission.

This document:

- gives an overview of the views of the community as collated by the Community Council working group;
- sets out the key issues that we have been able to consider so far, and
- defines the next steps we consider are important.

The main issues are addressed below with background material and considerations provided in attached appendices.

## Community outcomes

The area affected by these sections of the dualling project have many distinctive features (see Appendix I) which have led the working group to define the following outcomes it wishes to see for the community:

- conserve and enhance the distinctive culture, history, landscape, ecology, environment, economy and community of the area
- avoid and minimise effects on communities and individual households through detrimental noise, air quality and human impacts
- enhance community safety and the quality of life for people and families in the community, retaining this area as a vibrant and popular place to live
- enhance long term sustainable economic growth and retain as a positive visitor experience
- retain the overall integrity of the area
- bring benefits to the communities throughout the Community Council area from the Project.

These outcomes are in line with the Scottish Government outcomes, the aims set out within the National Transport Strategy and the Environmental Principles set out in the A9 Dualling Strategic Environmental Assessment.

In framing the detailed response below, the working group has taken account of these outcomes and on behalf of the community will continue to do so in our ongoing discussions with Transport Scotland and Jacobs.

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## Overview

**On the basis of the limited information currently available, the Dunkeld and Birnam Community Council cannot indicate a favoured option for these sections of the A9 dualling project. This reflects the strong feeling that the current proposals do not adequately recognise the complexity of dualling these two sections.**

On behalf of the community, the Community Council wishes to retain the right to identify preferred options, until information and meaningful dialogue has taken place with Transport Scotland to develop alternative approaches.

The Community Council would like to agree a process, with appropriate community engagement and realistic milestones, to agree a suite of enhanced options that would be considered workable by this community.

The Community Council and working group are keen to work with Transport Scotland and Jacobs in a cooperative and constructive manner to reach an appropriate and acceptable solution for these sections of the Project. However, to enable meaningful engagement, the community will require adequate responses to all the questions raised to date. On behalf of the community, the Community Council wishes to retain the right to identify preferred options, until information and meaningful dialogue has taken place with Transport Scotland to develop alternative approaches.

Community Council representatives look forward to discussing next steps, as proposed, to enable constructive dialogue with Transport Scotland and their contractors.

## **A. General Points**

Transport Scotland has set out the options being proposed for A9 dualling. However, the public meeting in Dunkeld on 8<sup>th</sup> February 2016 revealed a large number of questions and concerns about the proposed options and junction proposals. Many attending the meeting called for supplementary information on issues of concern, but were repeatedly told the information was not available at the meeting and would not be available before the deadline for public feedback had closed.

The Community Council does not think the issues that were raised at that meeting have been adequately reflected in the minutes. For example, the query on process including providing access to adequate information prior to the deadline for feedback is missing from the note of the meeting. The supplementary technical notes, supplied by Transport Scotland to respond to some of the questions raised by the community, have not supplied full information and in some cases could be misleading. As a specific example, the noise data requested by an Inver resident was in relation to all issues but the response was limited to the noise impact of the 3 options at the station which is one mile south of the village.

**Recommendation A1:** Transport Scotland amend the note of the Community meeting with our specific comments, to ensure a true record, and provide an adequate technical note in response to the issues set out at the community meeting on 8<sup>th</sup> February, which have been further expanded below.

We also think it is very important that Transport Scotland and the Scottish Government are aware of the strength of feeling in the local community.

**Recommendation A2:** Transport Scotland to confirm that senior authorities in Transport Scotland and the relevant parties in the Scottish Government will be kept apprised of the ongoing discussions with the local community in this area.

Although we recognise that the aim at DMRB Stage 2 is to focus on one preferred option, there is a general perception among the local community that the options being proposed, in particular the junction designs and the design options at Dunkeld station, lack imagination and do not adequately address the issues posed by the complexity of dualling these sections of the A9. All the challenges must be addressed and the consideration by Transport Scotland of an alternative, off line route, for the section between Rotmell and Ballinluig demonstrates that other options can be considered at this stage.

**Recommendation A3:** Transport Scotland should undertake a wider evaluation of other alternatives across both sections of the route to mitigate the issues faced in a more sustainable way. This exercise must be undertaken, in partnership with the community to ensure the process does harness local knowledge of issues and potential mitigation.

**Recommendation A4:** Transport Scotland should provide outline details to the community on the proposed alternative route between Rotmell and Ballinluig. This would allow for community input to this option before significant resource is invested into the design. Transport Scotland should also outline the detailed process and timeline for assessing this alternative route option.

There has been no detailed information provided by Transport Scotland or Jacobs on their assessment of impact of the proposed junction designs across the route, particularly on the Birnam to Tay Crossing assessment. In particular, a number of decisions, in particular in relation to the proposed Birnam junction, are predicated on traffic data. We do not have access to this data, and are not aware of the vintage or pedigree of the data. The working group have examined the impact of the junctions based on the limited information available on the Transport Scotland website. However, given that the junction design is a significant element of the route option decisions for A9 Dualling, with significant impacts on the surrounding community, we are disappointed at the lack of information available to inform the community. We have raised a number of issues in this respect in this submission.

**Recommendation A5:** To inform the community on the impact of the current proposals for junction design, we would ask Transport Scotland to provide more detailed information on the expected impact on the surrounding community of each proposed junction design with respect to (i) local community, (ii) visual impact including lines of sight, (iii) environmental and wildlife,

**Recommendation A6:** Transport Scotland to provide the relevant traffic data, and pedigree of such data, used to justify the decisions for each junction.

**Recommendation A7:** Transport Scotland to outline plans for traffic management in the area during the construction phase of the project.

We recognise that during any decision making process, one has to balance a variety of complex and interlinked considerations.

**Recommendation A8:** Transport Scotland should set out the principles by which it takes decisions on trade-offs between considerations to reach decisions in these circumstances, providing clarity on the process, and the role of the community in this process.

## B. Derogation of Standards

Transport Scotland and Jacobs suggested, at the meeting with the community, that there may be some scope to reduce the road design standards applied to the A9 dualling project in this area to reduce and mitigate the impact. The community would support such consideration and therefore wish to explore further with Transport Scotland. In particular the options of:

- Despite the stated aim of constructing the A9 to a consistent Class 7A standard over its whole length, the existing sections of dual carriageway between Dunblane and Inverness are not a consistent standard. There are roundabouts at Dunblane, Broxden and Inveralmond. There are non at-grade junctions along existing dual carriageway sections e.g. at East Haugh just south of Pitlochry. Further there are no current plans to upgrade the whole of the A9 from Dunblane to Inverness to the proposed 7A standard. As there is not a consistent road standard currently, there is no logical reason to comply with proposed Class A7 standard without question. Further, the unique nature of this locale, in terms of proximity to a settlement, landscape and historic significance, means that derogation of standards should be considered. **Derogation of standards could result in reduced footprint at junctions, a roundabout at the Dunkeld junction and reducing the gap between carriageways south of Dalguise.**
- Reduced speed limit on the section of the A9 passing Birnam and Dunkeld. Other roads in the country do not satisfy the requirements for their class of road, e.g. the urban motorways in Glasgow are limited to 50mph as is the A90 at Laurencekirk due to the special character of the junction. Variations are handled through appropriate signage or other measures. Reducing the average speed from 70mph to 50mph for a two-mile stretch of road at Dunkeld and Birnam might increase the 110-mile journey-time from Perth to Inverness by about 3%. **Reducing the speed limit to 50mph would have a significant effect on noise while having minimal impact on journey time.**

**Recommendation B1:** Transport Scotland should engage with the community on detailed possibilities of a derogation of standards and provide an assessment on how this will mitigate the Project impact on this section.

**Recommendation B2:** Specifically, Transport Scotland should provide a detail assessment on reduced speed limits and derogation at the junctions and how this has been considered to date

**Recommendation B3:** Transport Scotland should set out the approval process for agreeing derogation of standards.

## C. Noise

The Community Council value the provision of noise data for our evaluation, though you state this will not be included in the final Stage 2 DMRB report. In summary, the noise data provided at this stage is inadequate for the community to fully evaluate the noise implications of the current design options. We are therefore not able to assess the relative performance of the three design options in terms of noise impacts.

We make the following observations, with further background and observations provided as Appendix II:

- These data relate solely to the operational phase of the project. Construction of this stretch under the current options is expected to be protracted and disruptive. The character and nature of construction noise makes it significantly more intrusive than background traffic noise. Adequate mitigation of this impact on receptors may therefore be difficult over a long timescale. No assessment of noise or its mitigation during the construction phase has been offered.
- The DMRB Guidance does not appear to adequately consider the potential human impacts (particularly of noise and air quality) or any adverse economic impacts on the community. As such, it may not be fit for purpose for a section that is widely recognised as the most complex and sensitive of the entire A9 dualling project.
- The data provided assesses anticipated noise change from projected traffic volumes using the upgraded road during the years following completion of the project. It does not enable comparison with traffic noise from current traffic flows.
- It is noted that in Table 4 of your technical note there are only 5 incidences of major adverse noise impacts and only 6 incidences of moderate adverse noise impacts in the sub-set of sample receptors. This does not equate with the overall tallies in Table 3 for moderate and major adverse noise impacts, suggesting that the choice of locations in the sub-set are not a particularly representative sample for reporting purposes relative to this whole section.
- The community has not been provided with any noise data or information for the Tay Crossing to Ballinluig section and, as such, have not been able to comment on the noise implications for that section. However the comments in relation to noise impacts in this report represent the issue and concerns of noise for both sections.
- The full DMRB Stage 2 report is not yet available. Once completed it will be used for identification of the preferred option from the 3 current design options. It is not clear to what extent human impacts from long-term traffic noise, construction noise and vibration, and other environmental aspects including air quality, will be considered relative to engineering practicalities or cost in the selection process to decide on the preferred option.
- The criteria for selecting the location of noise receptors is not clear. For example, as offer from a household which is a listed building 45m from the A9, and noted in the SEA to be “at higher risk of direct and/or indirect effects”, was not followed up.
- Detailed assessment of noise, environmental impacts and mitigation will not be undertaken until the Stage 3 DMRB assessment of the preferred option. It is therefore important that this Community is provided with a full copy of the final

DMRB Stage 2 report, with adequate time to comment on the final assessment on the selected option.

The offer to meet with members of Transport Scotland's noise team is welcome and it may be helpful if a representatives with detailed knowledge of the Economic Appraisal Study Report and of traffic flow projections for the development could also be available, as traffic projections are an integral part of assessing noise impacts (as well as air quality).

We look forward to arranging this meeting.

**Recommendation C1:** Transport Scotland should provide maps showing the complete study area and all sensitive receptors, noise difference contour plots, details of how noise has been calculated, details of traffic projections, and details of data limitations and assumptions used in the noise modelling and assessment process.

**Recommendation C2:** Transport Scotland to arrange a meeting with the local community as soon as practicable to address issues in relation to noise

**Recommendation C3:** Transport Scotland to provide information on criteria for selecting the location of noise receptors.

**Recommendation C4:** Transport Scotland should provide the completed DMRB Stage 2 assessment. The community should be given time to comment on this prior to the Autumn decision and announcement on the Preferred Route Option.

**Recommendation C5:** Transport Scotland to provide a specific assessment of the noise impacts of the proposed junction design at Birnam, Dunkeld and Dalguise during the operational and construction phases.

**Recommendation C6:** Transport Scotland to provide an assessment of noise mitigation measures with the possible benefits they may have.

**Recommendation C7:** Transport Scotland to provide clarification on how, and at what stage mitigation measures will be consulted on with local communities.

## **D. Human Health and Air Quality**

The community notes that noise, vibration and visual impacts are all absent from consideration within the population and human health sections in the SEA Environmental Report in June 2013, the SEA Environmental Report addendum (2014) and the Post Adoption Statement (2014).

In the summary of issues in the SEA, impacts on road users - accidents and congestion – are considered but not the impact on local communities in relation to human health and population.

The Community Council notes that none of the Consultation Authorities to the SEA process provided a written response on human health.

**Recommendation D1:** Transport Scotland to confirm whether potential health impacts were raised as strategic environmental issues for the communities alongside the A9 Dualling project, and if so how these were considered and addressed.

**Recommendation D2:** Transport Scotland to provide a copy of the minutes from all meetings of the Environmental Steering Group is requested.

These responses will inform the Community Council and the wider community on whether and how these issues were considered in relation to the local population, whether and how potential impacts on their environment were assessed and what mitigation has been considered.

These communities attract people, which local economies depend on, with their fresh air, peace, access to green space, historic features, natural views and relaxing walks. This project could impact severely on the character, reputation and the economic and social well being of the community. A complete assessment of the issues, proposals for mitigation and options for those affected are required. A dialogue with the community could inform assessments.

### **Air Quality**

At the Public Meeting on 8th February 2016, a question was asked about air quality assessments. A technical note summarising the assessments undertaken to date was to be provided to the Community Council. No technical details have been provided, merely a statement that ‘there are slight differences between the route options in terms of number and type of air quality impacts, these are not considered to be significant.’ The assessment has shown that existing pollutant concentrations in the vicinity of the existing A9 are well below threshold levels set by UK air quality regulations.’

We make the following observations:

- the brief statement provided only refers to the route option not junctions. The junction proposals could have significant impacts for residents and public spaces nearby, e.g. in Dunkeld with the proposed junction’s proximity to school playing grounds, recreational grounds, core path network and GP surgery. The traffic would be rising to the flyover with increased acceleration, having just come down from Telford Bridge and slowed for a pedestrian crossing. The differences in pollution among different routes or options may be slight for road users, but the differences for residents and public spaces will vary in importance and effect to a

much greater extent. The effect of pollution from traffic may be worsened in areas subject to temperature inversions;

- no technical information on air quality has been provided to inform feedback;
  - It is noted that the SEA set out that:
    - ‘A number of properties in proximity to the current A9 could be identified as potentially sensitive receptors to noise and emissions. Each A9 dualling project will require a design stage environmental assessment (EA) to inform the selection of the preferred route alignment within the corridor. This will include air quality and noise assessments, in line with DMRB guidance, as well as assessment of predicted traffic growth emissions effects on sensitive human and ecological receptors at the local level.’<sup>1</sup>
- It is not clear why the community has not been provided with the air quality assessments as well as assessment of predicted traffic growth emissions effects on sensitive human and ecological receptors at the local level to help inform feedback.
- the assessment of pollutant concentrations with the existing A9 may be well below threshold levels as claimed, but the community interest is in relation to the comparison with projected emissions including the impact from projected traffic growth. The overall differences in pollution may be slight to road users in an overview of all route options, but these differences will be relevant to those resident immediately adjacent to different proposals and receptors public spaces such as the school, surgery or recreation areas.

It is not possible to give worthwhile comment on preferred options or junction layouts since the community has not received technical information about the impacts on health for local residents and spaces such as the school. Quantitative information about the slight differences in air quality for different options has not been provided.

**Recommendation D3:** Transport Scotland to provide information on air quality assessments, the comparison of options, the projections of air quality at the junctions, the impact of predicted traffic growth on air quality; assessment of these effects on sensitive receptors at the local level is requested; and how these assessments were undertaken.

It is also noted that within Key Findings of the SEA that the:

‘SEA considers that, in terms of Population and Human Health (emissions to air), A9 dualling could provide minor benefits to air quality, in terms of improved traffic flow and reduced emissions over the long term; however, it is more likely that dualling will present no significant effects at the route wide scale.’<sup>2</sup>

**Recommendation D4:** Transport Scotland are requested to provide the assessment that concludes there will be benefits to air quality; the evidence this conclusion is based on; calculations that demonstrate that emissions will be reduced over the long term, with projected traffic growth of at least between 10-15%.

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<sup>1</sup> Strategic Environmental Assessment, Page 47

<sup>2</sup> Strategic Environmental Assessment, Page 47

The SEA acknowledges that;

“There is potential for **localised minor adverse effects** during construction stages, where works are near sensitive receptors (human and /or ecological receptors).

SEA considers these as **temporary effects, important at the local level**, requiring detailed consideration and mitigation through local EA and construction environmental management planning best practice; however, they are not considered significant issues at the strategic programme level.”

**Recommendation D5:** Transport Scotland to set out the evidence for claiming that the effects have been assessed to be temporary; what detailed consideration there has been of this section of the A9 Dualling on air quality; and what mitigation is proposed to reduce the impacts of air pollution in this section of the A9.

### **Health impacts from noise and vibration:**

Residents have already been impacted and health affected by the noise and vibration from exploratory works done in the area, which Transport Scotland have advised will be minor compared to much more significant impacts with the construction works. The community is unaware of how much more significant, the comparison between options and mitigation proposed. The community are not aware of assessment of the impacts on health, what these will be over an extended period of time, whether the health impacts have been assessed at all and if so, what mitigation or support has been considered. We also note that none of the Consultation Authorities responded to the Strategic Environmental Assessments on health or human impact.

**Recommendation D6:** Transport Scotland is requested to provide an assessment of the potential future impacts on health to the local community, especially those resident within 200m of the road (which includes elderly, unwell, housebound, young children). For example, for a housebound person or a household with a young family, living a short distance from the dualled road, what will be the impact on wellbeing of vibration during construction and longer term with increased traffic.

Access to health services particularly in an emergency is a critical issue for these communities, with emergency services being as far away as Dundee and limited ambulance provision available in the area.

**Recommendation D7:** Transport Scotland to provide information on the impact of access routes for emergency vehicles and additional time added for patients to Perth/Dundee particularly for those losing direct access to the A9.

**Recommendation D8:** Could Transport Scotland explain why NHS Scotland was not invited to be a Consultation Authority.

### **Health impacts - core paths, cycle route disruption:**

The importance of core path networks and cycle routes to the health of residents and visitors, the impact upon these and length of disruption, proposals for replacement and alternatives are critical for residents and local businesses.

**Recommendation D9:** Transport Scotland should provide the proposals for the mitigation and compensation for their loss/change is important for the community to consider in relation to the options proposed. Has the impact on human health been assessed in relation to these closures/disruptions?

## **E. Flooding Risk and Water Environment**

This section of the A9 faces significant challenges from flooding. The communities are extremely concerned that the impact of the dualling project on flood risk has not been considered, and informed route options, and that the impacts from flooding could be worsened by the project. The proposals put forward to date have not been supported with presentation of any detailed flooding assessments.

Flooding risks are particularly relevant to the Tay Crossing to Ballinluig section but there are, as the SEA acknowledges, potential flood risks south of the Pass of Birnam and through Dunkeld. Implications downstream to Dunkeld and Perth also need to be addressed. Levels of flooding experienced in these sections in recent years, including in Decemebr 2015, have been more extreme, a trend likely to continue with climate change. However, in 2014, Transport Scotland stated there are no plans to update the Strategic Flood Risk Assessment Mitigation measures, including the use of sustainable drainage schemes appear to be inadequate.

**Recommendation E1:** Transport Scotland to advise whether assessments of flooding have taken into account recent high impact events and projected flood risk, to inform design plans in this section. In particular to advise on the impact of dualling on the existing flood plain and detail on design options being considered for the Tay Crossing to Ballinluig section In addition, to advise what decisions this has led to in terms of design and expected mitigation.

**Recommendation E2:** Transport Scotland to provide a Flood Risk Assessment and Catchment Management Plan for the Tay and Tummel catchment areas.

**Recommendation E3:** Transport Scotland to provide detailed advice on what consideration has been given to flood risk during the construction phase.

**Recommendation E4:** Transport Scotland to demonstrate what assessments and through a presentation to the community demonstrate that there will be no changes to flood risk and no impact to water quality.

**Recommendation E5:** Transport Scotland is asked to commit to a thorough assessment of local flooding risk, including thorough consultation with local stakeholders, prior to the selection of preferred options.

The Water Environment and Water Services (Scotland) Act guidance states that development should be designed to avoid engineering activities to prevent deterioration of and improve the water environment, unless there is no practicable alternative. There are a number of proposals for river crossings through this area, as well as proposals for engineering within a vulnerable part of a Special Area of Conservation, SSSI and breeding ground for protected species.

**Recommendation E6:** Transport Scotland should demonstrate how WEWS Act principles have been applied to all the crossings proposed in this section, and undertake consultation with local stakeholders and experts, to consider whether there are practicable alternatives to engineering proposed.

## **F. Ecology and Environment**

The local ecology and environment are considerable features of the local area, valued throughout the community, even around the world, integral to the culture and significant attractions for the visitor to the area, driving the local tourism economy. The potential impacts on the environment are significant and could affect European Protected Sites and Species and nationally important sites. The scheme will result in considerable loss of ancient woodland and impacts on the major freshwater resource of the River Tay Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) which includes the River Braan, Tay, and Inchewan burn. The SAC is designated primarily because of significant populations of salmon and lamprey with otter also a special feature. The Birnam, Dunkeld, Hermitage and Dalguise junctions are complex and need careful consideration to balance the needs of the public interest, environment and local people who will be most affected. The project will also impact on ecology and a wide range of protected species and animals, many specially protected such as red squirrels, bats, pine martens, otters and other animals such as deer, and a wide range of birds.

The defined objectives of the project include a commitment to 'mitigate the environmental impact of the new works and where possible examine opportunities for enhancing the environment'. Given the significant environmental impacts, we would expect that assessment of and mitigation of the key risks should be considered at this stage prior to selection of one option.

Further supporting material is provided in Appendix III.

**Recommendation F1:** Transport Scotland to advise how the proposed options address the issues and recommendations raised in the Strategic Environmental Assessment and the defined project objectives? Transport Scotland to work with statutory consultees to provide the community with a technical assessment on the points set out above.

**Recommendation F2:** Transport Scotland to advise on environmental impact of each junction.

**Recommendation F3:** Transport Scotland to determine and justify how the proposed options address the issues and recommendations raised in the Strategic Environmental Assessment and the defined project objectives.

**Recommendation F4:** Transport Scotland to advise on the potential mitigation and compensation measures to address the key environmental impacts.

## G. Public Transport

The A9 dualling project is designed to deliver economic growth through improvements to road safety and journey times as well as better links to pedestrian, cycling and public transport facilities. Specifically, it is welcomed that the Project Objectives (Transport Scotland A9 dualling website 2012) include:

“Examine opportunities for integration of non-motorized users and public transport facilities into the solution. Particular consideration should be made of enhancing the accessibility of adjacent communities to public transport facilities”

and the Dualling Challenges for Local Communities<sup>3</sup> are listed as:

- Improving accessibility
- Providing facilities for pedestrians, cyclists and equestrians
- Improving links to public transport facilities, and
- Minimising impacts of construction.

The A9 dualling should also provide the opportunity to improve the whole public transport network infrastructure for Dunkeld and Birnam, as well as for non motorised users (see Section H). Dunkeld and Birnam will undoubtedly suffer major inconvenience during the construction period but there is also an opportunity to not only maintain but improve the public transport infrastructure and services. The Highland Main Line Community Rail Partnership (CRP) covering from Dunkeld and Birnam to Carrbridge, was launched in Nov 2015. CRP priorities include “making rail more attractive and accessible to the community” and “improving access and linkages between stations and community centres/points of interest.”

A key concern is the impact of the dualling project on Dunkeld and Birnam station. The station is an important element of the local community both for locals and visitors. The Scottish Government is committed to improving rail services in Scotland, including the Highlands, with specific commitments to increased frequency of services and reduced journey times. Dunkeld and Birnam is an unmanned Grade A listed Station with Grade B listed signal box which The station is an important gateway to the village, although without direct road access from Birnam since the present A9 was built in the mid 1970s. The station has significant potential community and business asset, particularly if access can be enhanced.

The two current options for the station have advantages and disadvantages. Firstly, option B would make the station more accessible to Birnam, provides an opportunity for a transport interchange, ensures the station is long enough for planned intercity and sleeper trains and provides the opportunity to provide access for disabled and elderly people. Secondly, options A and C (relocate the station) would provide a smaller station,

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([http://www.transport.gov.scot/system/files/uploaded\\_content/documents/projects/A9%20dualling/A9\\_Public\\_Exhibition\\_Part\\_1.pdf](http://www.transport.gov.scot/system/files/uploaded_content/documents/projects/A9%20dualling/A9_Public_Exhibition_Part_1.pdf))

albeit with a “bus shelter” for waiting, with improved road access, and improved access for disabled and elderly passengers. However, the station would be separated from the village, construction would require significant earthworks with loss of woodland, and would impinge on Birnam Glen. At the earlier series of meetings when the station relocation was discussed, it was stated that the new station site would not meet Network Rail requirements as it was not level and did not have 500 meters of straight track. The existing station building would also have no road access. Further background material and consideration is provided in Appendix IV.

**Recommendation G1:** Transport Scotland to provide details on their consultation with Network Rail on the feasibility of relocating the station in options A and C

**Recommendation G2:** For each option, Transport Scotland to advise on the consultation undertaken with Network Rail regarding alterations to the station to make it compliant with disability access legislation and elderly passenger needs.

**Recommendation G3:** Transport Scotland to set out examples of similar application of the proposed design option B at the Station, to assist the community in considering the benefits and impacts of such a design

**Recommendation G4:** Transport Scotland to advise whether the new platforms meet all the requirements of the Train Operating Companies that the new trains, including the sleeper due from Autumn 2017, will be able to stop and pick up passengers.

**Recommendation G5:** What consultation has Transport Scotland had with the Highland Main Line Community Rail Partnership regarding their shared objectives of improving community access to public transport in the context of A9 dualling Options?

**Recommendation G6:** Transport Scotland to advise if they have considered the potential for sustainable and alternative forms of transport to be supported at Dunkeld and Birnam station, including electric car charging points, bike hire, integrated bus services.

**Recommendation G7:** Transport Scotland to advise on consultation undertaken or proposed with the community and local business representatives about possible future use of the station buildings under each option.

**Recommendation G8:** Transport Scotland to provide details on the consultation with Perth and Kinross Council as regards maintenance and lighting of the new, longer footpath access to the new platforms.

**Recommendation G9:** Transport Scotland to undertake an environmental impact assessment on the loss of ancient and semi-natural woodland and quarry pollution risks associated with options A and C.

**Recommendation G10:** Transport Scotland to advise on the details of consultation with Network Rail and Historic Scotland regarding the future use and maintenance of the present station building.

## **H: Non Motorised Users**

At the community meeting in February, Jacobs outlined in their presentation the high level impacts on pathways in the area and committed to re-alignment. There is concern at the lack of detail on which paths are affected due to the proposed road alignment, junction designs and the station options. There is also no specific information on how these affected pathways will be re-aligned and whether there are re-alignment options for all of them.

This information needs to be made clear to the community to inform their decision on the options.

Planned rationalisation of the NMU facilities in this area may prove detrimental to public access (walkers, runners, cyclists, horse riders, daily use by local residents, sports competitors, users of public transport both by train and bus) to an extensive network of paths. Further, in an area with a significant economic reliance on tourism, there is a need for an economic impact assessment of changes to the NMU facilities. There are key routes, including crossing the existing A9 and the River Tay at the current Jubilee Bridge, together with historic and scenic pathways, which must be maintained as part of this project.

The proposed method of assessment relies on the false assumption that if there are two paths between points A and B then one can be removed, ignoring the fact that usual usage and the principal attraction relies on both paths being used to make a circuit.

**Recommendation H1:** Transport Scotland are asked to commit that the core path network (including linking paths and particular in relation to the Tay Crossing) will be maintained.

**Recommendation H2:** Transport Scotland to provide a full detailed assessment of the impacts of A9 dualling plans for road and junction design on the core path network and impact on NMUs.

**Recommendation H3:** Transport Scotland to commit to full community engagement on the detailed impact and any proposals for re-alignment, with specific avoidance of paths of historic nature.

## **I: Cultural and Historical Issues**

As noted in the overview, the communities affected in this section have significant historic assets. The 2013 and 2014 A9 Dualling Strategic Environmental Assessments (SEA) states that it seeks to avoid adverse impacts on heritage assets, including effects on historic setting and develops effective mitigation and enhancements proposals.

The major concern of the community is that the historical and cultural assets of the Dunkeld, Birnam and Inver areas together with the section north of the Tay Crossing, have not been given sufficient due consideration in outline plans for the A9 dualling. While it is recognised that detailed plans will raise these issues, the choice of route options past Birnam and the junction designs must take cognisance of these issues now, with a detailed forward plan from Transport Scotland to engage and involve the community. Particular issues include:

- The overall area is a major tourist attraction (tens of thousands of visitors annually), and a sought after residential area. Visitors enjoy the ambience of the historic environment, while others come to stay and walk or cycle along historic pathways.
- The current plans would have the road encroaching on historic buildings and monuments in the Birnam, Inver, Dowally and Kindallachan areas, and close to the historic village of Dunkeld.
- The proposals do not appear to have assessed noise, visual and air quality impacts of the junction design at Dunkeld on the historic Royal School of Dunkeld nor the War Memorial, adjacent to the junction. The technical note provided by Transport Scotland does not include such detail, despite the junction moving closer to the school and being raised in its design to create a flyover across the A9.
- The proposals do not show any assessment of noise, visual or air quality impacts of the junction design at Dunkeld on Inver, with the creation of a new slip road adjacent to Inver and the dual carriageway created.
- Despite the historic significance of this area, as set out in the overview section, there have been no specific assessments undertaken of the A9 dualling impact and mitigation recommendations to deliver commitments that the project avoid negative effects in the setting of the place.
- Potential impacts on unscheduled archaeology in light of preliminary investigations into King's Seat, possible site of Iron Age occupation.
- The list of Listed Buildings in the 2014 A9 Dualling SEA does not include all of the Listed Buildings within the 200m corridor in the area. For example, Tigh-Fada, Todd and Chalmers Cottages in Inver are all Category C listed and within 200m of the A9 but are not included.

**Recommendation I1:** The SEA states that more detailed local level Landscape and Visual Impact Assessments will be required through later design stages. A local level assessment should be undertaken at this stage for Dunkeld, Birnam and Inver, given the recognised scenic and historic value of the area.

**Recommendation I2:** An impact assessment be undertaken by Transport Scotland, Historic Scotland, National Trust for Scotland and Forestry Commission Scotland involving representatives of the Community Council on the impact of A9 dualling and junction design on the historic and listed buildings in the area and mitigations to avoid minor, moderate and major adverse impacts at a local level.

**Recommendation I3:** Transport Scotland consider further options that could improve the historic, cultural and environmental attractions of the area – e.g. developing the Option B plans for the Station to provide a hub for transport, social and cultural activity supporting tourism and the local economy.

**Recommendation I4:** Transport Scotland share assessments undertaken to date by Historic Scotland on the impact of the A9 Dualling in this section on Listed Buildings and Scheduled Monuments.

**Recommendation I5:** Transport Scotland reviews, with input from Historic Scotland, the list of Listed Buildings assessed within the 2014 SEA and publish an updated SEA with the full list.

## **J: Next Steps**

The DMRB Stage 2 should provide opportunities for consultation with local stakeholders to ensure that locally important issues can be identified and effectively assessed. However, this opportunity has been seriously restricted due to inadequate information provided to the community from Transport Scotland and Jacobs to date.

Given the large number of outstanding issues and gaps in information, the community is not able to come to an informed view at this stage. Equally, the lack of information must call into question the ability of Transport Scotland to reach well informed decisions on options by June 2016.

The Community Council strongly recommends that Transport Scotland seek to provide the supplementary information set out above and enter into a joint process of engagement with the community to consider more creative options and potential mitigation in this unique area. Transport Scotland's commitment to providing this information and associated engagement would be welcomed. Transport Scotland could usefully provide an updated view and timetable of the process going forward.

As previously indicated in discussions with Transport Scotland, there is a commitment to ongoing engagement, including a meeting with representatives of the local community. It would be most appropriate for this meeting to take place after the questions in this submission have been answered to our satisfaction. We would hope that with satisfactory answers and subsequent meetings, local people would then be in a position to respond with a view on preferred options.

**Recommendation J1:** Transport Scotland to provide the supplementary information requested in this submission and commit to a process of examining further more creative options, with community engagement as outlined above.

**Recommendation J2:** Transport Scotland to confirm the Community Council can provide a formal response on route and junction option proposals, once it has received and had reasonable time and opportunity to consider this supplementary information and engage the wider community.

**Recommendation J3:** Given the above recommendations, Transport Scotland to provide an updated view and timetable on the forward process towards reaching a final Preferred Route Option decision.

**Recommendation J4:** Transport Scotland to provide information on how the Preferred Route Option Decision will be taken, by whom and on the basis of what evaluation and decision/scoring criteria.

**Recommendation J5:** Transport Scotland to provide information on how feed-back from the community on the final Preferred Route Option decision will be addressed.

## Conclusion

**On the basis of the limited information currently available, the Dunkeld and Birnam Community Council cannot indicate a favoured option at Dunkeld or among the options proposed between Tay Crossing and Ballinluig. This reflects the strong feeling that the current proposals do not adequately recognise the complexity of dualling these two sections.**

In light of all the supporting evidence outlined through sections A to J, the working group and Community Council have reached clear recommendations and a proposal for next steps.

We trust that you will recognise the effort from across the communities that will be affected by the project taken in formulating this submission.

On behalf of the community, the Community Council wishes to retain the right to identify preferred options, until information and meaningful dialogue has taken place with Transport Scotland to develop alternative approaches.

The Community Council would like to agree a process, with appropriate community engagement and realistic milestones, to agree a suite of enhanced options that would be considered workable by this community.

The Community Council and working group are keen to work with Transport Scotland and Jacobs in a cooperative and constructive manner to reach an appropriate and acceptable solution for these sections of the Project. However, to enable meaningful engagement, the community will require adequate responses to all the questions raised to date. On behalf of the community, the Community Council wishes to retain the right to identify preferred options, until information and meaningful dialogue has taken place with Transport Scotland to develop alternative approaches.

Community Council representatives look forward to discussing next steps, as proposed, to enable constructive dialogue with Transport Scotland and contractors.

## Appendix I: Context

The area of Highland Perthshire that will be impacted by these stages of the A9 dualling is a unique and special environment bringing together a fantastic landscape, renowned ecology, habitats, a long and internationally valued cultural and historical heritage.

It is a popular community for people and families of all ages, with accessibility to larger centres and a thriving local economy and community.

The A9 is closer to a number of settlements on these sections of the route than anywhere else in the Project and has a much greater direct impact on a large number of local residents than elsewhere.

This area was impacted significantly when the existing A9 was built in the 1970s with a section of the village, including the station, separated. The existing road already runs close to a large number of houses in Birnam and Inver and the proposed dualling and associated slip road will have a great impact on the community. Further, the project will have a significant impact on public transport and non motorised users.

The economy of the communities between Dunkeld and Birnam and Ballinluig are diverse with a significant reliance on tourism as a foundation and driver for the generation of wealth and jobs in the district. s

The importance of tourism to the local economy is recognised in the Perth and Kinross Structure Plan, where it states that The Upland Area (encompassing Inver, Dunkeld and Birnam) is characterised by small towns and villages set within an economy based on hill farming, forestry and tourism. Furthermore, it notes that the landscapes and historic environments of Perth and Kinross provide the resource upon which one of the areas most important industries, tourism, depends.

In addition to tourists and day visitors from other parts of Scotland, local people also represent a considerable market for the leisure and recreational facilities in Perth and Kinross.

Visitors enjoy the ambience of the historic environment and beautiful setting, while others come to stay and walk or cycle along historic pathways. Visitors are estimated to spend an average of £63.70 per person/per day and are a very important part of the local economy.

There are distinctive, unique, and in many cases, irreplaceable features which the Community Council considers Scottish Government, Transport Scotland, contractors, and all local representatives must have regard to in development of proposals on the A9.

Specifically, the decision making process should have direct cognisance taken of the following features:

- At least nine Scheduled Monuments; including ancient standing stones, adjacent to the route, which may be affected by the development; The historic Kirk and graveyard at Dowally, scheduled monument with the Beaker People's grave at Kindallachan and more.
- More than half of all the Listed Buildings within 200m along the whole route (It should be noted that not all Listed Buildings in this 200m corridor have been recorded, the Working Group has already identified several Category B & C buildings missing from the assessments)
- The only Category A Listed Building so close to the Project on whole route.
- Two Historic Gardens and Designed Landscapes of national significance.

- River Tay (Dunkeld) National Scenic Area
- Birnam Conservation Area - the only Conservation Area on whole route.
- The historic Victorian centre of Birnam built around the listed railway station and associated signal box, both threatened by the route.
- Historic village of Dunkeld, the Telford Bridge, Dunkeld Cathedral and a valued landscape with line of sight down the historic line of the town.
- Battlefield (Dunkeld) within 100 metres.
- Military Road and Warren Lodge Bridge.
- Internationally significant River Tay Special Area of Conservation and Special Site of Scientific Interest (SSSI) of national significance.
- 4 Protected species: red squirrel, otter, bats and pine marten
- Scarce and irreplaceable Ancient Woodland of national significance.
- Breeding sites of special significance for protected species and more, including birds.
- Residential areas immediately adjacent to the A9. Primary school within 200 m of the dualling and even closer to proposed junction.
- Local economy highly dependent on the cultural, historic, environmental integrity of locality.
- Recreational areas, children's playgrounds, community green space, GP Surgery - all within 200 m of the proposed route options and junction
- Highly valued transport hub providing connecting trains on Highland Mainline and buses for a wide surrounding area to and from all parts of Scotland, and beyond to London on Caledonian Sleeper.
- A range of thriving communities and businesses, employing local people, on the section north of the Tay Crossing, requiring access to the A9 for daily lives and emergency services.
- 41 core paths extending to over 18 sq miles, with historic paths through ancient woodlands – including the Inver Walk, Braan Walk, Inchewan Walk and where people can enjoy the fresh air of the Hermitage, see Niel Gow's Oak, Charlie Macintosh's postal route, the River Tay, Birnam Glen and the Bishoprigg Road, Loch of the Lowes and countless other places. Core path networks and cycle paths critical to local health, society and economy.
- Area of elevated Deer and Vehicle Collision risk in the vicinity of Dunkeld.
- Homes, livelihoods and existing infrastructure already vulnerable to Flood Risk Zones facing increased threat from flooding with climate change.

## **Appendix II: Detailed comments on Noise Data Provided by Jacobs.**

The Birnam to Tay Crossing section includes receptors in smaller settlements, such as Inver, isolated dwellings in proximity to the existing A9 and those in the communities of Dunkeld, Birnam and Little Dunkeld. The technical notes, which have been provided (Jacobs Technical Note – Ref: B2140002/TN011 Revision 01) concentrate on environmental effects on the main communities. Tabulated noise change assessment figures indicate that all receptor dwellings in proximity of, and within 600 metres of this section of the existing A9 have been assessed, although noise impacts on the “other receptors” listed do not appear to have been included in the totals.

DMRB Stage 2 only assesses traffic noise change from the upgraded road between the baseline at the start of its operational phase and the 15th year of its operation. Construction noise and mitigation are not formally included at this stage, although some additional information on these aspects has helpfully been provided for information.

DMRB does not compare future noise change with noise levels from current traffic flows. Given that current traffic flow and associated noise is perceived to have increased markedly in the last five years, it is open to question whether this is a fully representative approach to adequately inform the community of the impact of the additional noise expected from the new road development.

It is our view that natural growth in traffic flow between now and the proposed year 1 baseline (the year of opening) may well generate higher noise changes, when compared with current traffic noise, than those presented in Table 3 of the technical note. Therefore we consider it preferable that a real time baseline using existing noise levels should also be used as part of any future noise assessment methodology. This would enable an accurate comparison between the current noise levels, those projected for the start of the new scheme and the following 15 years of operation, taking into account the growth in traffic over that 15 year period.

We accept that a 3dB<sub>A</sub> increase is accepted to represent a doubling of noise perceived by human receptors and is the level when receptors can notice audible change. It would therefore also be helpful for us to be provided with any estimated levels of traffic noise, which have been calculated to inform the assessed changes.

The noise assessment in the Technical Note has been presented with and without mitigation measures, which is helpful. However, we also note that the receptors chosen for reporting purposes do not equate well in terms of the overall tallies from the wider sample for moderate adverse and major adverse noise impacts, suggesting that the choice of locations in the sub-set to be used for reporting purposes are not particularly representative. It is also not clear if table 3 is based only on calculated noise from projected traffic flows along the A9 or includes effects from traffic on new interchanges, altered approach roads and access to the station. Noise from other sources including alterations to the railway, topography and sound reflection from hard surfaces will also contribute to long-term noise. This all suggests that the noise modelling at the DMRB Stage 3 will be complex and as such must be communicated clearly to the communities concerned and with time to respond.

As the analysis currently stands, Table 3 in the Technical Note suggests that some receptors will experience less traffic noise under each of the 3 proposed options. However, it is also clear that many will experience moderate or adverse effects even with mitigation. Table 3 also suggests that in many cases the mitigation measures make little difference to traffic noise impacts.

The noise data is limited to the impact of the three design options by the Dunkeld and Birnam Station and does not adequately set out the noise impact of dualling the current single carriage-way, the proposed junction designs and associated slip roads and provide this information against all communities in the overall stretch between Birnam and Ballinluig.

Option B seems to create much less adverse long-term effects on receptors from traffic noise than Options A or C. However noise and vibration from associated complexity and extension of duration of the construction is expected to have significantly greater impact under Option B. This is a complex trade off for a community to make, particularly when construction is acknowledged to be protracted, and again suggests that we need to acknowledge the challenges of dualling the two sections under question and look again for creative engineering solutions that might work more effectively and sympathetically for the community.

Mitigation of both traffic and construction noise will have limited efficacy and physical noise barriers and bunds may be obtrusive and aesthetically unacceptable for residents used to appreciating open vistas of the surrounding landscape. It is also our view that the visual impact for the community who are permanent residents is of far greater importance than the short and transient experience of drivers. Noise barriers may also need to be high to mitigate effects above ground floor level in dwellings.

The character and nature of construction noise makes it significantly more intrusive than background traffic noise. Construction noise and vibration mitigation measures such as limitation of maximum permitted noise levels, restrictions of hours of operation and physical barriers are often helpful and acceptable in the short term. However, construction of this stretch is expected to be protracted and disruptive. Adequate mitigation may therefore be difficult over such a long timescale, particularly for receptors who are at home during daytime working hours, including shift workers trying to sleep, elderly residents and those who are sick. With a high proportion of elderly residents in the community and in sheltered housing this is a particular issue of concern.

It is noted that alterations to alignment of the railway may entail night-time working to minimise disruption to rail services. Associated noise is likely to be particularly obvious and intrusive relative to normal background night-time noise levels in this rural area.

### Appendix III: Ecology and Environment

The potential impacts of the proposed design across the route on the environment are significant and could affect European Protected Sites, protected Species and nationally important sites:

- The proposed design will result in considerable loss of ancient woodland, particularly at the Dalguise and Birnam junctions and potentially the Tay Crossing. Impact from proposals on the Tay Crossing to Ballinluig stretch are less clear. The community has not been provided with detail on the amount of woodland impacted and where. Loss of ancient woodland cannot be replaced nor can the impact be mitigated or compensated.
- **Birnam Junction:** The proposed slip road and proposed junction alignment will remove ancient woodland and breeding sites for red squirrels, otters, bats and potentially pine martens all of which are protected species. The construction will remove resting places and disturb red squirrels, otters and potentially pine martens and many birds which breed here. This will be irreversible impact. Significant impact to birds is likely with this option and sequestration of this wildlife corridor by severing the woodlands to the movement of animals is very likely to cause them harm and ultimately more road casualties will result.
- Deer are already a hazard on this section of the road and this option will only push more deer onto the A9 potentially causing accidents and disruption as they have no way to cross the road as they are unlikely to move along the Tay corridor any longer.
- **Dunkeld Junction** The species mentioned above will also be affected by the Dunkeld options and all options will cause significant disruption and potentially high environmental impact on these sites. All the Dunkeld junction options affect red squirrel, pine marten, otter and deer and there will be loss of breeding sites and habitat for the majority of these species.
- The least disruption caused is likely to minimise the environmental impact therefore B is the best option in this respect but it will affect other elements. Option A and C move the location of the railway station and the new site will considerably impinge on ancient woodland, red squirrel breeding sites and pine marten which inhabit this area. The ease of access to the railway by people at the moment is a major benefit and wildlife are often encountered such as red squirrels on this walk.
- **The Tay Crossing and Birnam and Dunkeld Station** design options impact on the major freshwater resource of the River Tay Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) which includes the River Braan, Tay, and Inchewan burn. The SAC has been designated primarily because of significant populations of salmon and lamprey with protected species, the otter a special feature.
- Wildlife use the River Braan (part of the Tay SAC) and associated habitat to move between Birnam Hill, the Hermitage and Inver. Large scale re-design of the slip-roads and junctions will impinge on wildlife significantly here and great care is needed to reduce environmental impacts on a very sensitive area. Otters are very active between the Braan and Tay and they are a priority species for the SAC.

- **The Hermitage slip road** - This option appears to encroach onto the River Braan, part of the Tay SAC. It was not clear what impact this might have at this stage as the options are not detailed enough. However otter shelters and breeding sites are present in this section and careful mitigation is required to address this during the construction phase. There is a concern that pollution will be difficult to control so close to the Tay SAC.
- **Jubilee Bridge to Ballinluig** - The Jubilee bridge crossing will have an impact on the Tay but it depends on the design and layout of a new bridge crossing. The options presented on this section are very limited and offer little design option given the difficult conditions and proximity to the Tay and the ancient woodland. This is a living landscape with many farming, fishery and environmental characteristics. There is a considerable ancient woodland character along the A9 in this section. Protected species will again be affected as listed above.
- Transport Scotland have indicated that some of the potential options at the Dunkeld and Birnam Station will impact on the Inchewan Burn, with its levels being reduced. However, there is no information on the expected approach, the impact on the local ecology and environment and proposed mitigations. Without this information, a balanced view cannot be taken on the Station options proposed.
- **The Birnam, Dunkeld, Hermitage and Dalguise junctions** are complex and need careful consideration in considering needs of public interest, environment and local people who will be most affected. There is currently a lack of information to allow the community to understand how this will be achieved and the optimum approach and design to mitigating impacts on the local ecology and environment.
- The project will also impact on ecology and the habitats of a wide range of protected species and animals, many specially protected such as red squirrels, bats, pine martens, otters and other animals such as deer, and a wide range of birds.
- The A9 Dualling Strategic Environment Assessment does not mention the presence of one of these protected species, the pine marten.

## **Appendix IV: Rail**

The Scottish Government is committed to improving rail services in Scotland, including the Highlands. The Highland Main Line Rail Improvements Project is being delivered in phases to 2025 and aims to achieve a journey time of 2 hours 45 minutes between Inverness and the Central Belt, with an average journey time of 3 hours, and an hourly service. Phase two of this Project, which is being delivered between 2014 – 2019, supports an hourly service in both directions with further average end to end journey time reductions of approximately 10 minutes.

Dunkeld and Birnam is a Grade A listed Station with Grade B listed signal box which Historic Scotland describe as “A 1919 signal box by the Highland Railway Company, is located to the east and is intervisible with the station adding contextual and group interest.” The station is an important gateway to the village, although without direct road access from Birnam since the present A9 was built in the mid 1970s. It is unmanned and the buildings have from time to time been commercially let; it represents a significant potential community and business asset, particularly if access can be enhanced.

The Highland Main Line Community Rail Partnership (CRP) covering from Dunkeld and Birnam to Carrbridge, was launched in Nov 2015. CRP priorities include “making rail more attractive and accessible to the community” and “improving access and linkages between stations and community centres/points of interest.” (West Highland News Spring 2016, p23)

At present the A9 dualling project proposes two options for the Station; each has advantages and disadvantages.

### **Option B: Retain the Station in its present Location**

- This would retain the Station and directly link it to Birnam by road and pedestrian footpath. This would be a major improvement over the present situation and would be significantly more accessible than the proposed new station in options A and C.
- It would also, with the improved car park, present the opportunity to have a public transport interchange at the station.
- It would be much easier to bring the station back into some form of commercial and/or community usage and this would assist in maintaining the fabric and appearance of the building.
- It would be expected that passengers arriving at the existing Dunkeld and Birnam station would get a better impression of the area (subject to addressing access issues for the elderly and disabled, see below).
- Option B would also ensure that the station and platform length would be fit for purpose for the new sleeper and intercity trains (five coaches long instead of three) due to be introduced in from Autumn 2017.

- This option would also allow Network Rail to retain the existing sidings for their maintenance work; these were used extensively during the latest period of line closure due to flooding at Dalguise, a very vulnerable section of line.
- This option would remove the access to Birnam glen directly from the village which is currently used by house holders, cyclists, walkers, horse riders and wildlife. Lowering the Inchewan Burn will also have an impact on wildlife and may increase flood risk.
- The major disadvantage of retaining the station, as it is now, is the issue of disabled access to the trains from the existing platforms, which are too low. The platforms require to be raised and there is also the issue of creating disabled access to platform 2. A major community benefit from the A9 Dualling project would be work to improve access for people with disability and the elderly by improving pedestrian access to both platforms from either side of the Birnam Glen rail bridge using the existing or old access points.

### **Options A and C: Relocate the Station**

- These options would provide Dunkeld and Birnam with a new station, albeit with “a bus shelter” for waiting.
- The road access from Dunkeld and Birnam will be via a grade separated junction at Dunkeld which will be an improvement over the present road access which requires crossing the flow of traffic on the A9 from both existing junctions.
- The station would presumably be designed to appropriate standards for disabled and elderly passengers.
- At the exhibition and the 8 February community meeting, it was suggested that it would be necessary to provide both lift access and a footbridge from Platform 2 (northbound) on the new car park side of the Station to Platform 1 (Southbound). This would certainly improve the station facilities for disabled and elderly passengers arriving by car.
- Both the road access and pedestrian access will however require further travel for most people.
- The pedestrian access from Birnam Glen will provide separate access to both platforms and will be accessible for wheelchair users. However it will be up a series of slopes that, if present winter maintenance regimes are anything to go by, will be difficult to keep free from ice, especially during the months when the sun does not shine on that part of the Glen.
- In addition they will require to be lit which will affect the natural beauty of the lower part of Birnam Glen.
- The new station would require substantial earthworks to provide space for platforms, a passing loop, and a big car park and this would require loss of areas of ancient and semi-natural woodland as well as mitigation works to deal with the pollution from the former Ladywell quarry.
- At the earlier series of meetings when the station relocation was discussed, it was stated that the new station site would not meet Network Rail requirements as it was not level and did not have 500 meters of straight track.

### **Bus/Coach**

The local bus service provided by Stagecoach should not be affected by any of the proposals. However Option B, retaining the location of the present station would

facilitate better integration of the bus and train services, especially with the proposed hourly daytime train services.

In terms of the intercity coach services provided by City Link, these are not subject to regulation or receive any public subsidy. It is therefore not possible to control in anyway their activities and therefore the new road proposals might have little impact on their services. However, in November City Link withdrew 7 of the 10 daily services stopping in Birnam on their route between Edinburgh/Glasgow and Inverness, to the disadvantage of both residents and visitors; one of the reasons was given has been the need to improve coach journey times between Inverness and Edinburgh.

The £3bn being spent on dualling the A9 to improve those journey times must not be used as a reason to reduce the number of long distance coaches stopping in Birnam.