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Planning and Rural Development
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Dear CNPA Planning and Rural Development

**REF: PLDP 2020 - REPRESENTATION - BLAIR ATHOLL -
PREFERRED SITES H1 AND H2**

Please find below the summary of the considered thoughts of my family regarding the proposals for housing development in the context of Blair Atholl. You will see that our love of the countryside, appreciation for a healthy and safe environment and the belief in the need for far sighted strategic planning are reflected in these comments.

We recognise the need for ongoing development in the area and have a desire to contribute constructively to the planning process. You will note that we do not agree with all of the development proposals put forward by Cairngorms National Park Authority, but have tried to justify our thinking with fact and opinion and subsequently make constructive alternative suggestions to help meet the objectives of CNPA.

We request that you receive these comments in the positive spirit with which they have been evolved.

Blair Atholl Preferred Site H1 – Old Bridge of Tilt

Development scale and density

Maps, written records and aerial photographs since approximately 1750 suggest that the extent of Old Bridge of Tilt has been more or less the same for that period. Of the 16 houses currently forming the settlement, 8 have been built as in-fill development within the last 18 years. The area covered by the settlement is approximately 3ha i.e. a current housing density of approximately 5.3 units/ha.

Preferred site H1 allows for an addition of up to 20 further dwellings on an area of 1ha i.e. the number of dwellings in the settlement could be more than doubled and the proposed housing density at 20 units/ha would be approximately four times greater than is expressed in the character of the existing hamlet.

Therefore I find neither the scale nor density of the proposed development in keeping with the present character of Old Bridge of Tilt and subsequently suggest that the current proposal is not suitable for a rural location such as this.

Access to existing community resources

It should be noted that Old Bridge of Tilt is not contiguous with the local population centre of Bridge of Tilt and Blair Atholl where all the usual community resources are concentrated (shops, public transport [bus and train], mobile bank, village hall, post office, garage, cafés, pubs, restaurants, doctor surgery, recreational areas, school, etc.). The distance from the centre of the proposed development to the nearest community resource is approximately 900m.

I believe that a new development which especially seeks to provide affordable housing should be in close proximity to services, not least to increase the probability of active travel e.g. walking and cycling. There are currently several obstacles to active travel when considering the proposed development.

The C road from Blair Atholl to the proposed site (single lane with passing places) is not a safe place for the elderly or a young family to be walking due to high road usage (cars, vans, tractors and trucks) and the difficulty for the less abled, young and parents with buggies to vacate the path of vehicles as a consequence of the banked/walled sides to the road. As there is no public transport to the site, increased reliance on private vehicular travel would be the probable consequence, thus compounding the people versus traffic conflict.

The Core Path between the road and River Tilt equally has issues (see Figure 1). The surface of the path is currently very uneven and is often waterlogged or running with water. Perhaps of greater significance are the steep and occasional vertical surfaces down to the river which is regularly Grade 3-5 white water. Equally, there are safety issues at both the north and south ends of this river section of this Core Path. The north end emerges abruptly on to a section of relatively narrow road bounded by walls on both sides where no footpath currently exists. At this point there is insufficient width for passing cars and pedestrians to be safely accommodated. The south end of the path joins the B8079 via a flight of old stone steps that are steep, uneven in height and have shallow tread depth. The top of the step abuts the road i.e. there is very limited space to retreat from traffic even for an individual, but especially so for a parent with young children. Crossing the B8079 from north to south (to join the footpath on the other side of the road) affords reasonable sight lines to allow safe passage. However, in the other direction (south to north) it is not possible to see far enough to the east to ensure a safe crossing. On occasion, this leads to rushed crossings toward the top of the flight of steps, which are regularly wet, covered in leaves and slippery. Identifying the location of the top of the steps is a particular problem on dark winter nights. The situation is compounded because the crossing is in close proximity to a road junction and bridge that is narrow for two passing vehicles i.e. the focus of vehicle drivers is often on the road and other vehicles rather than pedestrians. Crossing here requires judicious decision making by a competent and physically able adult, children and/or those less able or otherwise incumbered are

exposed to greater risk. I therefore conclude that at this time there is currently unacceptable risk associated with use of the Core Path on the east side of the River Tilt.

The C road from Blair Atholl toward Old Bridge of Tilt (Glen Tilt road) branches to serve the hamlets of Old Blair, Middlebridge, Fenderbridge, Monzies, Kincragie, Tirnie etc and both Atholl and Lude estates. In addition, visitors are drawn to holiday accommodation, the Glen Tilt car park (particularly for mountain biking and walking) and also to the collection of Munros and other hills at the Monzies road end. The Glen Tilt road leads in to the hills, but is nevertheless busy, especially from spring to autumn when visitor numbers are enhanced. Visitors in particular seem to struggle with the 'single lane with passing places' character of the road. Special consideration should be given to the impact of further traffic along this road as it regularly feels as though it is operating beyond capacity, especially during summer months.

It should be noted that Perth and Kinross Council road maintenance services on the Glen Tilt road are inferior in comparison to the treatment of the B8079. In particular, gritting services on the Glen Tilt road during winter are subordinate to the B8079 i.e. the Glen Tilt road is sometimes not serviced in winter. The B8079 is a prioritised route partly because the salt store for the local road network is at Blair Atholl Sawmill Yard (Economic Development site ED1). Development directly adjacent to the B8079 would benefit from more frequently serviced and therefore safer roads.

In addition to traffic volume, there are three further topics for special consideration with regard to the Glen Tilt road:

Access and egress from proposed development site H1. Vehicles entering and leaving the development site should be able to do so without negatively affecting traffic or pedestrians. There is a height difference of approximately 1.5m from the development site down to the road, hence any access splay will need to be appropriately proportioned to accommodate the resulting slope. Sight lines to the north and south from the mid point of the development are reasonable, hence it is suggested that a single access is constructed at this point. Multiple points of access to the development are likely to cause increased traffic disruption and increase risk. Consideration should be given to the requirement for large vehicles to enter, turn within and exit the site during construction and subsequent occupation e.g. removal and refuse collection vehicles.

The Glen Tilt road should not be extended in any way to the west due to the environmental concerns raised below (e.g. SAC and AWI designations, protected species).

The road to the north of the development. Traffic from the proposed development can be expected to travel north (towards the hills) as well as south (towards the village). Just beyond the proposed development site to the north, the road narrows and the road edge is defined by garden boundary features such as walls and hedges. Initially there is room for cars to carefully pass, but with 250m towards both Old Blair and Middlebridge, there are sections of single lane road where passing is not possible. Any increase in traffic in this

area will naturally cause issues. It should be considered if it is appropriate for any development to proceed if increased traffic in these areas is a consequence.

Junction with the B8079. There is convergence of vehicular and pedestrian activity in the area where the Glen Tilt road joins the B8079 (see Figure 1). Within a short distance of this junction is the main entrance to Lude Estate, a proposal within a current planning application for an entrance to the Bridge of Tilt Hotel, the Roundhouse Inn and five new build holiday units (see Appendix 1) and the crossing point for a Core Path. Should Preferred Site H1 go ahead (i.e. an increase in traffic is consequent), special consideration should be given to the design and construction of a new junction at this point. Of particular reference should be the need to slow traffic in this area, sight lines for traffic crossing the bridge from the west, sight lines for traffic from the east turning in to the Glen Tilt road and also for pedestrians crossing the road at this point.

At present, refuse collection is on Sunday mornings and the road is effectively blocked whilst the bins are emptied. Regarding the proposed new development, if the refuse collection vehicle were able to pull completely off the road whilst emptying the bins from up to 20 houses, there would be limited further disruption to traffic and the health and safety of workers would be assured.

Environment

The section of the River Tilt to the west of Proposed site H1 falls within the River Tay Special Area of Conservation and as such affords protection to the habitat and Qualifying Species. Of particular note here is the regular presence of Eurasian Otter (*Lutra lutra*) along this stretch of river. This narrow linear woodland (an Ancient Woodland Inventory site) and river site is also regularly used by further protected species e.g. Red Squirrel (*Sciurus vulgaris*), Pine Marten (*Martes martes*), Red Breasted Merganser (*Mergus serrator*) and bats spp. are a constant feature at dusk.

The western bank of the river is adjacent to a large camp site and is therefore regularly used by visitors to the area and locals alike. The woodland to the east of the river (and on the same side as the proposed development) sees less traffic. In order to maintain habitat value and to reduce disturbance to protected species, it is recommended that there should be no additional foot passage through the woodland as a consequence of the proposed development i.e. any footpath creation should be outwith the woodland.

The negative effect of street lighting on bat species is well documented. Due to the rural nature of the proposed development site and the established population of bats in the area, I believe any form of street lighting would be inappropriate. Equally, a development of high density is likely to generate an increase in light levels compared to present and would therefore impact negatively on bat populations.

There are a number of large mature trees in the riverside woodland corridor with decay pockets, cracks and crevices. These features are potentially good roost habitat for bats and should be retained whenever practicable.

Position in the Landscape

Blair Atholl has been identified as an 'Intermediate' settlement within the Cairngorms National Park and as such is likely to be a continual focus for development. At some point it will be necessary to identify the transition areas from 'built up' to 'rural' in the areas adjacent to Blair Atholl, otherwise there is a risk of the wider countryside succumbing to development through lack of forward thinking. The result would be a complete change of character, a loss of landscape and historic value and reduced appeal to tourists. Old Bridge of Tilt and Old Blair, for example, are currently small settlements occupying rural positions in the landscape. They are bordered by fields, rivers and woodlands and are separated from equally small neighbouring settlements by features that reinforce the rural character of the landscape.

Old Bridge of Tilt has seen significant but considered in-fill development in recent years. Further development would now substantially expand (for the first time in at least 250 years) the area occupied by the settlement and would consequently reduce the rural context. There is a risk that piecemeal development over subsequent years, in any direction around Old Bridge of Tilt, or any of the other small settlements outlying Blair Atholl, would alter significantly and negatively the historic pattern of development currently displayed in the wider landscape. For this reason, I believe it is important to identify that development should be focused adjacent to Blair Atholl itself i.e that the proposed development at H1 should not take place at all.

Should this recommendation be adopted, the current transition from 'built up' to 'rural' as one travels from Blair Atholl to Old Bridge of Tilt would be maintained.

Suggested planning conditions for Preferred Site H1:

- Glen Tilt road capacity must be increased to development site and beyond;
- Bottleneck for traffic to north of proposed site must be addressed;
- Access for construction traffic to be kept away from existing dwellings;
- Design and reconstruction of new junction necessary at B8079/Glen Tilt Road/Lude Estate entrance/Bridge of Tilt Hotel/Core Path focal point;
- Single point of access to development – large splay with good sight lines;
- New footpath construction required;
- Refuse vehicle access off road during collections;
- Resolve Core Path safety issues – vertical/steep rock faces, uneven path surface (slip, trip and fall risk), white water, unsafe transitions to roads at north and south ends of the path;
- Environmental Impact Assessment including potential impacts on protected species on the proposed development site, adjacent woodland and protected river catchment.

In summary, I believe that the proposed development at Preferred site H1 is not suited to the location for landscape, historical, environmental and health and safety reasons. I therefore request that CNPA consider the alternative proposal of sites H2.1 and H2.2 outlined below as replacement.

Blair Atholl Preferred Site H2 – Bridge of Tilt

In contrast to Preferred Site H1, Preferred Site H2 is located adjacent to the community services within Bridge of Tilt and in close proximity to further services to the west in Blair Atholl. Particularly relevant is the immediate access to public transport via the bus network and also the ease of active travel to the primary school. Provision of a pedestrian crossing over the B8079 should be made in the area of the development.

Equally many of the other potential constraints outlined above in relation to Preferred site H1 do not apply here, or are less of a concern e.g. environmental issues, health and safety, adjacent road capacity, winter road maintenance, etc. Dependence on cars and the risk of social isolation are less likely to be issues in closer proximity to the existing village.

A further benefit of Preferred site H2 is that there is obvious scope to expand development should the need arise, the ease of connection to mains sewers and the ease of access for construction and other traffic from the B8079. Figure 2 highlights the location of Preferred site H2 and further suggests additional sites that should be considered for future housing and perhaps other types of development.

Site H2.1 is a proposed extension to the north of site H2 to match the depth of the existing neighbouring copse. The additional development in this area would help absorb any loss of housing should it be decided that site H1 should not go ahead.

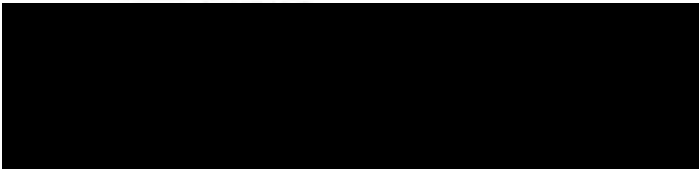
Subsequent development sites are proposed at H2.2, H2.3 and H2.4. These staged development sites are proposed at this early time so that strategic development assessments of the merits of the proposal can be considered. There is also the hope that piecemeal development, with all its attendant hazards, can be avoided. The east end of H2.4 is aligned with the current extent of housing on the south side of the road. Native tree and shrub plantings at the end of H2.4 coordinates with a similar feature opposite and would visually screen the end of the development when viewed from the east.

Well designed, new developments could adopt many design cues from the development pattern and building styles seen on the opposite side of the road. There are currently three existing entrances from the B8079 in to the areas proposed for development i.e. it should be possible to retain the existing character of the road frontage with only minor modification for the developments behind.

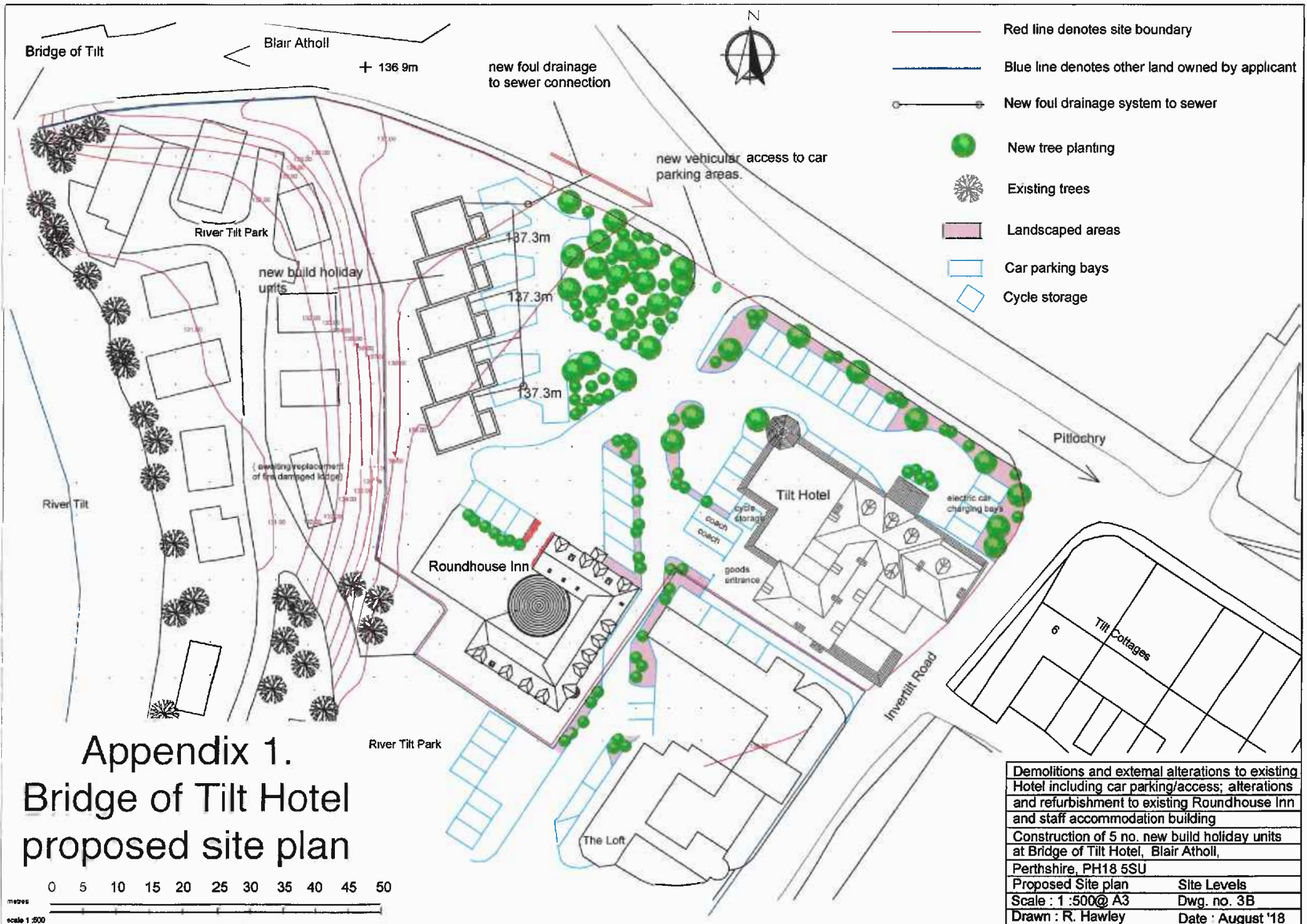
Figure 3 shows the proposed developments in the context of community services that currently exist in Bridge of Tilt and Blair Atholl. It is clear that the existing community services would be convenient for the proposed development sites, and as such should help to ensure their use, longevity and thereby support the basis for a thriving local population.

Comment

In the Blair Atholl area in general, because of the proximity to whitewater, outstanding road and mountain bike riding and easy access to the hills, there is a risk that the objective to provide affordable housing for local residents inadvertently delivers 'affordable second homes' for lovers of the outdoors from the Scottish central belt and beyond. Measures should be taken by CNPA, as in other UK National Parks, to ensure that new housing is occupied by full time residents.



Chris Cowell



Appendix 1.
Bridge of Tilt Hotel
proposed site plan



Figure 1. Preferred site H1
Old Bridge of Tilt

Figure 2. Preferred site H2
Bridge of Tilt northern extension



Figure 3. Preferred site H2 including existing community resources

