



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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Dear Robert Latimer

Scoping - Scotgold Resources Ltd, Cononish Farm proposal 90/01102/DET/S

Thank you for inviting the Mountaineering Council of Scotland (MCofS) to comment on the proposals at the scoping stage. Cononish glen is very important for hill walking and climbing interests, hence conservation of the quality of the landscape and maintenance of ease and aesthetics of the access opportunities are vital. We are recognised by the Scottish Government as the Representative Body for hill walkers, climbers and ski tourers. We have over 10,000 members and aim to represent the interests of all the 400,000 regular Scottish mountaineers on issues relevant to access to, and conservation of, Scotland's mountaineering environment.

Site Location and Description

Although there are details of the elements of the current site, there are no details on size of the old site or visual impact. In the ES, we would expect to see a comparison of the existing site and the proposed site impacts. This could be done using before / after photos / mock ups of the site from viewpoints such as approach along Cononish glen and routes on surrounding slopes and ridges popularly used for enjoying access.

Proposed Operations

This section describes industrial activities. It must be appreciated that numerous people currently enjoy this glen for quiet recreation and to escape the noise and bustle of more urban life. The site benefits from a level of wildness that is a highly valued quality in Scotland. Maintenance of this experience is paramount. In the ES we would expect consideration of alternatives to the industrialisation of this relatively wild area including off-site processing, and assessment of noise levels.

Reserves

Although the initial application will be for 10 years with an estimated 6 ½ years of operation plus 1 year of construction, as more reserves are anticipated to be found, the development lifespan may be significantly longer. This potential long term existence illustrates the importance of not relying on decommissioning on the basis of a temporary impact.

Tailing Management Facility

This aspect to the project will be highly important to assess potential impacts. We would expect the ES to reflect the importance of illustrating graphically what the facility will look like from various viewpoints along routes commonly used by walkers and climbers. This should include an illustration of the potential expansion for storage of the 1,000,000 tons of tailings and the visual impact of the re-routing of the Eas Anie. It must be borne in mind that the use of embankments, although screening other elements, are an alien element in themselves and will be very difficult, and maybe impossible, to make fully blend into the landscape.

Restoration

Care must be taken in distinguishing restoration / reconstruction and mitigation. Landscape screening mounds are mitigation measures, not restoration as they do not return the area to previous habitats and topography. We would anticipate that the ES would address the need for a bond to ensure proper decommissioning irrespective of change of ownership or the owning companies financial health. Details of the restoration would also be expected to be provided. There is also no reference to re-landscaping the site i.e. naturalising the topography. This would expect to be addressed in the ES. We are concerned about reference to a “small facility” to be retained for visitor experience. The MCofS will object to any retention of facilities / buildings or man-made features remote from the public road.

Minor Impacts

Conflict with recreational users is in no way a minor issue. The route along the glen and past Cononish Farm is a very popular route throughout the year and is a primary access route for 4 Munros and 1 Corbett, and also an access point for the NNR.

Rights of Way

The MCofS welcomes the recognition of equality of importance of general area access with access along paths. We would also emphasise that access to the type of area under consideration is appreciated as a rough wild experience, hence walkers would not support addition of any extra “facilities” which may add to the visual impact in the area.

Content of the ES

Alternatives considered should include transportation of tailings away from this relatively wild area, transportation of extracted rock for processing away from this relatively wild area and no development of the mine.

It should also be noted that if the intention really is to ensure maximal attendance at the public events that at least one should be held on a weekend day, and the Non-Technical Summary should be available online.

Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Hebe Carus
Access & Conservation Officer