



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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4/3/10

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Dear Ms Sweeney

Cononish Goldmine Proposal 2010/0017/MIN – MCoFS Response

Scotland (MCoFS) is the representative body for hill walkers, climbers and ski tourers. As the only national representative body of the sport of mountaineering in Scotland, we have 10,500 members, and are recognised by the Scottish Government as representing the interests of all mountaineers. Our concerns are focussed on access to and conservation of ecology and landscape in mountaineering areas.

This development proposal is at the heart of the one of only two national parks in Scotland and is in one of the most popular hill walking and climbing areas. The site is surrounded by four Munros, one Corbett and winter climbing locations. The route up Cononish Glen and past the site is the generally-used access route to these. The area is enjoyed for its relative accessibility and wildness. It is therefore a prime location to be considered for conserving access and wildness and the impact is well beyond the landtake of the actual site.

6.5 Landscape Impact Assessment

6.5.2.1 states that the landscape character sensitivity is “medium.” This is based on the existing residual evidence of previous mining activities. Much of the residual impact is masked by vegetation (except for the track) when viewed from a distance as evidenced in figure ?. Residual impacts of previous developments do not dictate the level of sensitivity. Additionally, there will be a threshold beyond which an area no longer has the capacity to absorb further impacts without resulting in a step change in the landscape character. This concept is part of Scottish Planning Policy at paragraph 102 where it is stated that, “areas subject to significant constraints on new development may include areas at risk from coastal erosion, areas where conservation or enhancement of the natural and historic environment requires development to be limited and locations of value for recreational uses.” Cononish Glen is highly sensitive. When comparing the landscape impact as shown in the before and after illustrations in figures ? and ?, it can be seen that the proposed development does indeed completely alter the character of this glen through introducing an alien focal point. The greatest impact will be from the buildings, compound and especially the Tailings Management Facility (TMF). These are new additions to the landscape. The MCoFS assesses the short to medium term impact to be high due to the high sensitivity of the relatively wild landscape, and particularly due to the TMF impact that will be visible from a wide area along many popular recreation routes specifically used to appreciate the currently wild area of landscape. Should the restoration be achieved, the long-term impact will be low and localised, therefore acceptable, but it has not been shown that this is achievable. There is however no evidence presented of the probable effectiveness of TMF vegetation

recovery. Additional to any recovery time for the vegetation, there are no plans to re-profile the TMF, which will be a permanent feature, even beyond decommissioning.

The landcover impact assessment in 6.5.2.3 of the TMF during the construction and operational phase, and beyond, are of major significance. Although mitigation measures of plant plugs etc are planned, these are not all likely to take and will take a significant length of time to spread to cover the affected area. The soil will be very abnormal and it is unlikely that any plant plugs or reseeded will be anything approaching as effective as on normal, undisturbed soils. This does not seem to have been taken into consideration. The suggestion that it will only be the most recent area of activity that will be affected is misleading. Much of the entire TMF area will take the lifetime of the development to show significant natural landcover. A contingency must be built into any consent. Specific requirements should be laid down in consent with respect to ongoing recovery of the TMF area landcover. This should be designed such that continued mining be dependent upon satisfactory landcover recovery.

6.6 Visual Impact Assessment

The MCoFS is concerned to see only passing reference to visual and landscape impact in the Non-Technical Summary (NTS). The NTS should draw the attention of readers to the most important issues in the full document. Landscape and visual impact are a primary issue, and this passing reference is misleading.

In the full ES, the MCoFS agrees that the most significant visual impact will be the TMF, but we are less reassured without the necessary facts that the progressive restoration will have much impact on the overall impact in the short and possibly medium terms. Reasons for this are explained in the section above.

There are numerous references to downgrading the importance of the impact due to the small number of viewers “Visual impact” is about the impact on the view, not the overall impact on all visitors to the area. More relevant is to consider impact based on the sensitivity of the receptor (viewer). The issue is not “viewpoint sensitivity” but receptor sensitivity. In wild areas where viewers have passed from man-made areas such as buildings, public roads and tracks to the open hillside undergoing a physical journey, it is the striking difference in visual experience that affects the visual impact. It is to enjoy the wildness that most make the effort. As such, those viewing the site from wilder areas, as most example viewpoints are, will be very sensitive to whether their expectations of a generally wild view are fulfilled or not. This is particularly the case where the location is in a national park. Additionally, visual experience can be disproportionately affected by alien focal points irrespective of the area of view taken up by that element. The TMF will therefore have an impact far greater than the proportion of view (therefore distance) than would be reflected in calculating area impacted from any particular viewpoint. The sensitivity of the receptors rather than their number has not been genuinely factored into the calculations of the impact ratings. The result is that the ratings in the ES underestimate the real visual impact to a significant degree.

15 Recreational Access

Cononish Glen is a commonly used route to excellent hill walking and climbing opportunities in both summer and winter. Surrounding the head of the glen there are 4 Munros (a common goal is to achieve ascent of all these mountains over 3000 feet) and a Corbett (mountain over 2500 feet and another popular goal). There is also the ice climb of Eas Anie waterfall. An illustration

of the popularity of this climb is that 6 teams were reported on 26/2/10 alone. Other winter climbing is enjoyed in the corries of Ben Lui.

It is unclear from the ES what the impact on recreational interests will be. It is stated that there is to be no restrictions on the core and informal paths at any time, and only restriction to the mine site area. The MCofS of course accepts the need to restrict access to areas of active mining, however the mine site area is not defined. From experience MCofS has learned that it is vital in the planning application / consent that the boundary is agreed. This must be done and reflect that the "site" under the Land Reform (Scotland) Act 2003 (LRSA) must be of minimum area and for minimum period. The area of active mining and settlement ponds is the "site." The approach track should be explicitly excluded to enable continued recreational access.

The MCofS is also concerned about access to the busy car park at approximately NN 344 291 and access to the main glen track from this car park during the construction phase. The MCofS would strongly object to any plan that proposed blocking access up Cononish Glen for any period of time or removal of car parking opportunities. The only realistic alternative, although inconvenient and requiring greater height gain travelled, is along the track from Lower Tyndrum station. It would need ensured that there was sufficient car parking at this location and that there are no issues with access across the rail line. Any planning consent must require appropriately advance warning of any requirement to use alternative routes, and promoted in the outdoor press, along with clear signs and realistic alternative provision. Without the necessary specification of likely time periods and arrangements for alternative access, the statement later in the ES that no significant affect will occur to path access cannot be relied upon. The bridge at approximately NN 339 291 over the Crom Allt is on the WHW as well as being the only approach route to the bottom of Cononish Glen. The ES states that this bridge will need engineering work, but there is no plan to prevent disruption to access over the Crom Allt. The only method to achieve this would be a temporary bridge, however worryingly no statement is made to that effect in the ES. The MCofS would expect the National Park to build a proviso into any consent that there was a requirement for a mutually agreed access management plan.

A non-access recreational issue is the popular ice climb of the Eas Anie waterfall. The impact of vibrations due to blasting has not been addressed. These would need to be assessed from an engineering perspective to ensure that climbers would not be endangered or the vibration damage this important resource.

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

Yours sincerely

Hebe Carus
Access & Conservation Officer