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Stuart Mearns (by email)
Head of Planning and Rural Development
Loch Lomond and the Trossachs National Park Authority
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17 November 2017

Dear Stuart

2017/0254/MIN

**Development of an underground mine to extract gold and silver with associated service and production building, plant, storage areas, Tailings Storage Facility (TSF), settlement pond and gauging station, bridge and car parking (Further revision of 2014/0285/DET)
Minerals, Cononish Road, Tyndrum. Stirling**

We have considered the application 2017/0254/MIN and make the following comments concerning visual impact and the access management plan. I preface these by expressing our disappointment that the applicant has made no attempt to consult with us regarding the application, despite the PAN in the Scoping Report indicating that it was their intention to do so. We also note that the Park Authority planning portal does not include all the required photomontages and panoramas.

Visual Impact

Mountaineering Scotland objects to the application on the basis of visual impact. The amount of material to be stored on the surface would increase significantly and as a result, adversely impact the visual appearance and amenity of this important glen.

We note that planning permission was originally granted on the condition that waste would be limited, specifically because of the visual impact which would have resulted. We see no reason, or circumstances, in which an increase in the waste to be deposited on the hillside would not affect the visual amenity.

We do not agree with the applicant's claim that to somehow build the increased waste into "morainic" type features will diminish the impact, because there are no similar natural morainic deposits at this location and such features are unlikely to appear natural. In addition, there is an assumption that vegetation cover for these features would eventually become the same as the surrounding areas. As the mounds will be of very different material to the surrounding area there is no guarantee that the vegetation will grow, grow well, or will not be subject to damage, which may result in the fine material blowing or washing out from the site.

We note that there will be a substantial increase in the buildings on site. The idea of hiding them behind a bund raises similar issues to those mentioned above. There will be a break of slope where the bund interfaces with the natural hill-side making it appear "foreign" in the landscape. From the hills around the facility will be more noticeable.

Access Management Plan

We welcome recognition in the access management plan that the Eas Anie waterfall is popular with climbers. It is popular as an ice climb because it is one of the relatively few ice climbs in Scotland which has

easy access both from the Central Belt and from the main road end. Subject to the climbs being in condition, weekends during the period from December to February are likely to be the most popular for climbing, albeit not exclusively.

Whilst we welcome the use of an indicator button at point 2 to alert the mine that climbers are present, there must be clarity as to whether their presence as notified by the use of the alert button would take predominance over blasting operations for the duration of their visit, as it is possible that explosions could weaken the ice with the potential for a serious accident.

In addition to the button at point 2, we ask that there is provision for a visible warning at the road end, near points 7 or 9, to alert climbers when blasting is planned for that day and enable them to avoid the walk from points 7 or 9 to point 2.

We request that further measures be taken to advise climbers about blasting during the ice climbing season by, for example, following the example of the Heading for the Hills website, by which plans for stalking are pre-advised to those wishing to take access. Pre-advice of blasting plans through an intermediary such as Mountaineering Scotland would enable climbers to avoid journeys over considerable distances which may then be met by a 'blasting in progress' sign. Mountaineering Scotland would be pleased to liaise with the applicant to discuss how best to set up such an advice system either on our own, or on a partner organisation's website.

Signage

For information, we have highlighted to the Park Authority access team this week that there is the inappropriate use of language on the current sign at the entrance to the mine road, illustrated below:



Yours sincerely,

David Gibson
CEO, Mountaineering Scotland