



## The Mountaineering Council of Scotland

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Your ref: **15/01972/FLL**

7 December 2015

Dear Sir

**Formation of mine for the extraction of minerals, erection of associated service buildings, formation of transfer site (including processing operations), access track, haul road and borrow pits and associated restoration, Land At Duntanlich, Logierait**

The Mountaineering Council of Scotland recognises the national significance of the deposit and the long-term benefit to the local economy to be gained its mining. The proposed development will have an impact on local landscape quality and an adverse visual impact on views where it is visible. The applicant has sought to minimise these impacts (cf Section 7.6) and we believe that with appropriate conditions, the proposed development is acceptable. In reaching this view we have taken into account the proposed beneficial restoration of the existing Foss mine site.

We concur with the Environmental Statement's concluding assessment in Section 5.9: "Effects on hill walkers are considered to be relatively small in relation to the benefits associated with the Duntanlich Mine Development."

Matters where we have some concern but which could be dealt with by conditions are as follows.

1. We accept that it is necessary, after restoration, to maintain track access for some time to the Foss mine portals for groundwater monitoring. This does not require heavy vehicles and as soon as possible the track between the borrow pit and the mine site should be narrowed to 4x4 vehicle width. When no longer needed for monitoring, it should be removed completely or, as a minimum requirement, reduced to argo width with a grass centre.
2. Visibility of gravel roads is very dependent upon the colour of the material used. Light colours contrast with dark moor vegetation whereas dark colours blend in much better. We would look for the colouring to be as recessive as possible, and use of gabbro capping as proposed (para 3.3.14) should achieve this.
3. The consent should be for the lifetime of the mine and a condition attached that requires complete restoration thereafter. Any proposed retention of gravel roads after mine restoration should be the subject of an application at that time, to be decided based on the circumstances and attitudes prevailing 50 years hence, and not be consented as part of this application (cf para 10.5.2). (This situation differs from recent applications for permanent retention of temporary short-term construction tracks (cf Beaulay-Denny OHP tracks): the mine tracks will

be consented for 50 years and we cannot presume what circumstances will prevail at the end of that period.

Yours sincerely

David Gibson  
Chief Executive Officer