



Mr Gordon Watson
Director of Planning
Loch Lomond and the Trossachs National Park
Carrochan
Carrochan Road
Balloch
G83 8EG

26th August 2011

Application Number: 2011/0166/MIN

Development Proposed: Development of an underground mine to extract gold and silver with associated service and production building, plant, storage area, Tailings Management Facility (TMF), recirculation pond and gauging station, diversion of burn, access roads, bridge and car parking at Cononish Road, Tyndrum.

Dear Gordon

I am writing on behalf of the Friends of Loch Lomond and The Trossachs to object to the above planning application.

We have welcomed the opportunities made available to us to consider this revised application as submitted and applaud your team's efforts in negotiating significant improvements to a scheme previously argued as being un-alterable (application **LT/2009/0235/PAC/S**). These amendments and enhancements however do not alter, in our opinion, the fact that this proposal runs counter to the conservation aim of The National Park and therefore warrants your application of the Sandford principle in this case.

Notwithstanding the significant reduction in the size of the tailings management facility (TMF) and the efforts to improve landscaping and restoration works, our objection remains centred on this revised TMF and the damaging effects of the overall development in terms visual impact, noise and light pollution. The natural heritage values of this area and indeed its tranquillity cannot be underestimated and should not be placed in jeopardy. And under no circumstances can this development be allowed to put at risk the river Tay catchment.

Our grounds of objection to this application are as follows:

1. Permanent physical damage to the natural heritage of the National Park
2. Damage in one of the most accessible and visited parts of the Park
3. Disturbance within this accessible yet 'wild' part of the Park
4. Lack of overriding national interest, or significant and lasting local community benefit legacy
5. Potential damage to the River Tay catchment area

1 Permanent physical damage to the natural heritage of the Park

While the proposed TMF is smaller, it is understood that for the first five and a half years the method of extraction and deposit of waste materials will mirror that earlier proposed and only after that will waste be replaced into the mine cavities. What will happen if then, this is not a practical solution? While we acknowledge improvements in landscape restoration and the use of tree planting off site to lessen impacts, we still believe that this development with a modern industrial site incorporating a major industrial building, is totally at odds with, and alien to the prevailing environmental character of this locality. That which certainly marked it as eligible for inclusion in the National Park in the first place. We are also concerned that the TMF may settle or deteriorate in the long term well beyond the 10 years and beyond the applicant's commitment to repair or restore the site.

2 Damage to one of the most accessible and visited parts of the National Park

Impact on visitors' enjoyment of the natural qualities of the area is a critical factor. The plans involve visually intrusive, noisy and environmentally damaging activity over 10 years and then mining spoil (the TMF) set by some of the most accessible and beautiful parts of the Park. The mine will compromise the wilderness aspect of the Cononish approach to Ben Lui which with its magnificent corrie and famous 'Central Gully' winter route, is the foremost Munro in the Southern Highlands, and walkers will pass close by going to or from the three Munros close by, in a part of the Park readily accessed from Tyndrum, the railway and the A82 /A85. The dramatic mountain scenery would be particularly blighted over 10 years operation and by the TMF in the longer term. The applicant has given the impression of having limited commitment to best environmental practice - at the time of writing, timing for waste disposal and restoration is still uncertain and we understand there are still key environmental issues un-resolved with your team.

3 Disturbance within this accessible yet 'wild' part of the National Park

Rock blasting will create disturbance for walkers on and beyond the West Highland Way and the adjacent Munros who will have come for the peace and quiet of a natural environment. In addition, for those walking up the Glen and from the slopes around and above the site, there will disturbance from rock crushing (with the doors of the plant building remaining open) and other 24/7 site operations, including unnatural light pollution. This is entirely inappropriate in this National Park environment.

4 Lack of overriding national interest, or significant and lasting local community benefit legacy

As before, from the plans submitted to you, no overriding national interest is demonstrated. In this scenario the Loch Lomond and Trossachs National Park as planning authority is obliged to proceed in terms of its own guidelines, placing environmental protection above other considerations and firmly applying the Sandford Principle. Taking into account the proposal submitted, rather than the press campaign, we can see no justification for the fourth aim of the Park – economic – to override the first – environmental. . The money offered to the community remains very modest and insufficient to create lasting and significant community benefits. Most aspects of the alleged long-term tourism benefits are un-quantified and these are not set out in sufficient detail to be a convincing reason for overriding the conservation interests.

5 Potential danger to the River Tay catchment area

Given the very high levels of rainfall in the area, we have real concerns that in times of increasingly extreme weather events such as catastrophic rainfall combined with sudden deep snow melt, the TMF may still fail (as it is now as the applicant describes 'at the edge of technology of this type') with incalculable damage to the economically and ecologically valuable Tay River catchment area and to the immediate Cononish catchment. Setting such a plant at the very head of these catchments is an unacceptable risk which will continue long after the applicant is off-site.

If the Board of the Loch Lomond and The Trossachs National Park are minded to approve this application, we urge you to cover for the range of significant uncertainties over the mining operation and its aftermath through:

- The requirement to lodge a bond suitable to cover all eventualities to complete re-instatement in the event of abandonment of the works at any stage – before any works are permitted to commence.
- A proportion of the bond should also be retained many years beyond the 10 year life of the mine as there may be much longer term settlement or deterioration of the TMF necessitating further repair and restoration.
- Clarity that the 10 years' project life is all that is granted and that all reinstatement works and removal of building structures is adhered to within the prescribed timescale.
- We would further urge you to insist that the company 'hedges' against fluctuations in gold and silver prices to reduce the possibility of a sudden price fall closing the project before complete restoration is completed.

We trust that once again you will stand on the founding legislation of the National Park by applying the Sandford principle and recommend refusal of this revised application, and in so doing avoid setting a precedent of unknown consequence.

Yours sincerely

Simon Lewis

Simon Lewis
Director

Friends of Loch Lomond and The Trossachs