

# **SUPPORTING STATEMENT**

## **CONONISH OBJECTIONS 2017**

In response to the objections received from Nick Kempe, and from David Gibson (2017\_0254\_MIN-Correspondence\_from\_Nick\_Kempe-100295956 and 2017\_0254\_MIN-Correspondence\_from\_Mr\_David\_Gibson\_CEO-100296254 – issues raised in ***bold italic***), Scotgold wishes to clarify the following:

***Tonnage of material stored/left on the surface.***

The currently permitted figure of 400,000 tonnes relates only to tailings and does not consider the material necessary to build the TMF embankment for the currently permitted scheme, nor does it take into account the recirculation pond embankment, or the effects on landform associated with the diversion of the Allt Eas Anie.

***The current permission was conditioned such that all waste additional to the 400,000t was to return to the mine. The reasons for this was to minimise landscape impact. How can an increase in waste not affect visual amenity?***

In preparing the current application, early dialogue with the National Park established the principle of the new landform and all parties agreed that the potential effects on the landscape were reduced in comparison to the permitted scheme. This has more to do with the distribution of the material than the total volume.

***The actual proposal is now for 530,000 tonnes of tailings AND 170,000 tonnes of crushed rock at total of 700,000 tonnes of waste or almost twice that originally consented. This is a massive change with serious landscape consequences.***

In relation to the scale of this effect on the landform, an appropriate comparison would be to consider the total material volume (rather than tonnage) placed above the existing ground level, associated with each scheme. The permitted scheme made provision for 400,000t of tailings but the total volume above existing ground level (egl) was around 430,000m<sup>3</sup>. The current proposal, allowing for 720,000t of waste would in fact also lead to a volume of around 430,000m<sup>3</sup> above egl (as per Appendix G Construction Schedules, ES Appendix 3).

***Morainic features unlikely to appear natural because there are no similar deposits at this location.***

The fact that there are no such large scale morainic deposits on site does not mean that they could not have formed here. The landform of the site has been influenced by ice depositing material (retreating, or otherwise overloaded) from both the main valley of the Cononish and the side valley, east and south-east from Coire na Saobhaidhe it is conceivable that lateral and medial moraines could have left larger scale deposits around the mine site location. There are similar forms around Cononish Farm.

***The mounds will be of a very different material, there is no guarantee that vegetation will grow.***

The chemistry and permeability of the material will not in fact be very different and the replacement of the stripped surface materials (around 0.4m depth) from the stack footprints back onto stack surfaces will ensure that a suitable (the same) growing medium is provided for vegetation. The

replacement of turf (i.e. material held together and including the original vegetation) will be maximised, with direct placement from stripping a subsequent stack area onto the completed preceding stack.

***The tailings waste is in effect sand which is easily eroded.***

Existing superficial deposits, which underlie soils/peat, across the site consists of, "Glacial Till, 0 – 3 m thick, loose to medium dense orange or brown gravelly silty SAND to silty sandy GRAVEL with cobbles and boulders" and "Lodgement Till, 0 – 4 m thick, loose to medium dense, becoming dense, pale bluish grey silty SAND to very silty sandy GRAVEL with cobbles and boulders." The tailings characteristics are described as a sandy SILT; the compaction, shear strength and permeability of the tailings has been properly assessed in order to demonstrate the stability of the stack design. This expert advice has been provided by the applicant team and the National Park's own advisors.

The compacted tailings have very low permeability, similar to that of the existing till. The majority of incident rainfall will flow through soils/peat and as surface run off, as is currently the case, this will aid in the establishment and maintenance of similar vegetation to that of surrounding habitats.

***There will be a substantial increase in buildings on site***

There is an increase in buildings proposed compared to what is currently on site, there is no increase against what is currently permitted. In fact, the building now proposed is slightly smaller than that already permitted.

***Access management and blast warnings***

The currently permitted development was conditional upon an Access Management Plan, a Blast Warning System and Access Signage being agreed in advance, this detail was submitted and agreed with Planning Authority, no change to these provisions are proposed.

***Existing Site Signage***

The existing sign requests that no one visit the mine without prior authorisation and provides a contact number; this is entirely in line with the provisions of the Land Reform (Scotland) Act 2003 which excludes access from certain land including active minerals operations. The sign was in direct response to the level of public interest in the project. The sign does not state 'no access beyond this point', that restriction is made clear at the inner gate, the point of entry to the currently operational area.

In order to avoid any misinterpretation, this notice is now to be replaced by standardised National Park information signage. This will more clearly define the area excluded from access rights and illustrate suggested/preferred access routes to Beinn Chuirn and Eas Anie.