**CONONISH GOLD MINE HEARING STATEMENT 27 FEBRUARY 2018**

Good afternoon I’m a retired environmental planner and engineer with many years experience of derelict land reclamation and mineral development projects. I’ve become increasingly concerned at the steady attrition of our wild land and the proposed gold mine represents one more nail in the coffin.

Although the report before you appears comprehensive, it has several important omissions and is biased in favour of the gold mine going ahead. Officers have also been selective in the information that has been published and any decision you make today could be challenged in the courts.

The main thrust of the report is that the proposals are an improvement on the previously approved scheme but the benefits are not as clear cut as indicated:

- the amount of waste materials to be disposed has significantly increased;

- the tailings stacks, haul roads etc cover a much larger area;

- the area of peat affected is much greater, difficult to square with peatland restoration initiatives elsewhere in the Park; and

- the duration of mining operations has increased from 10 to 17 years.

You also need to be aware that the visualisations of the two schemes given in Appendix 9 to the report favours what is proposed now and viewing these from the other side of the Glen tells a different story. The final restoration plans for both schemes are actually quite similar.

This is not say I prefer the previous scheme, far from it, with both proposals totally inappropriate for a National Park or Wild Land Area. Planning permission for the previous scheme has of course expired and your decision today should be based solely on the merits of what’s now proposed.

The gold is mined from a vein that also has heavy metal mineralisation. Incredibly, SEPA and your officers have accepted that the anticipated half a million tonnes of ore processing waste is inert based on a single sample analysis provided by the applicant. No information is provided as to the sample selection circumstances or if the proposed flotation agents were included with one of these known to be toxic to aquatic life.

SEPA seem content to rely on the monitoring of water discharges from the site against pollutant trigger concentrations but some of these derive from modelling the previous scheme not that now proposed. By the time pollution is identified it will be too late and the damage will have been done.

The onus is of course on the National Park Authority to ensure the proposals meet the Management of Extractive Waste Regulations. The inert wastes listed in the Guidance specifically excludes that from veil mineralisation, which it is, with the ecotoxicity of the leachate being insignificant, which it’s not.

The ore is crushed to a fine powder to extract the gold and it will be difficult to engineer this to the proposed landforms. The glacial till found here is quite different containing sand and gravel as well as supporting contrasting plant communities.

Establishing any vegetation on nutrient deficient silt that is possibly toxic to plants will be extremely difficult in a location where it rains, a lot, and increasingly so. Incomplete vegetation cover will accelerate the surface erosion of the tailings, polluting the water environment, and allowing potentially toxic dust to be spread over a wide area when it is dry and windy.

A longstanding principle of UK National Park planning policy is that new mineral development should only be permitted where it meets a local need for building materials or there is an overriding national interest and is reflected in the wording of your Local Plan Mineral Extraction Policy. The Lake District National Park Local Plan has a similar policy but when recently made a UNESCO World Heritage Site it was subject to quarrying activities being progressively downsized to what is needed for local use. The proposed gold mine is therefore contrary to Local, National and International policy.

One of the arguments for the development of the gold mine is that it will deal with the unsightly spoil heaps and buildings there now but the report makes no reference to the financial guarantees already in place for site restoration. When the mine exploratory works were approved in 1989 a legal agreement provided £50,000 for the restoration of the land, that is still enforceable, and a bond has more recently been lodged with the Crown Estate for a similar sum covering site remediation.

The impact of the mine on the special qualities of the National Park and Ben Lui Wild Land Area is too great a price to pay for the anticipated economic benefits and mitigation measures. Site restoration uncertainties could leave a huge permanent scar on one of Scotland’s most valued landscapes and, together with unresolved pollution issues, means that the precautionary principle must be applied and planning permission refused.

Bill Stephens