Intro

I am representing 14000 members of Mountaineering Scotland and 86000 members BMC whose intersests we care for north of the border.

*Visitor experience*

The report prepared for you makes it clear that there will be significant effects resulting from this application for both visitors to the glen and the surrounding hills such as the iconic Ben Lui.

These effects will last for the entire life of the mine and possibly beyond. That represents at least 10 years of disruption to the tranquillity of this glen – something visitors do not expect in a national park and wild land area – the NP describing the area as having some of the most wild land in the park

This seems an unreasonable trade-off of in favour of private over public use.

*Restoration and mitigation*

The assessment of effects in the LVIA [Landscape Visual Impact Assessment] assumes that the restoration plan has been implemented successfully / according to best practice / and therefore the impacts will reduce over time.

Yet the report is non-committal over that success, for instance using phrases such as “...provided there is successful restoration”. Even the developer seems to have less confidence in this restoration process requesting the aftercare time be reduced from 20 years to 5.

The report recognises that if vegetation does grow on the waste piles it will be different to that surrounding it.

The report points out that important natural habitat (wet heath) will be lost. It will be replaced by a different -man-made -one (planted woodland).

The special qualities of the glen are therefore to be lost and replaced by a landscape created by people, effectively, landscape gardening on a grand scale.

In such a man-made environment it seems difficult to argue the natural landscape is being protected or that the special qualities of the glen have been preserved.

Yet according to the report this will be a higher quality landscape – the logic of that statement is that the National Park would be better if we removed the natural habitats and replaced them ones created by people.

The plan for the glen, offered as mitigation, is not inspirational.

The first year consists of painting farm buildings, planting trees around an enlarged car park and vegetating batters on the track – this is simply normal mitigation measures and nothing additional to what would be expected.

Indeed the long term plan is similar consisting of building a deer fence and planting some trees.

 Ensuring continued access is quoted as a theme of this plan - that is already in place and would remain – nothing is been provided that does not already exist and would continue to exist.

However

What is proposed is a fundamental change to the character of the Glen– and a clash of park aims -yet the case officer dismisses the use of the Stanford principle which we firmly believe should apply here.

So

If the restoration does not work what then?

There is no plan B outlined (and we note again the case officer saying the restoration has to work / not / it will work).

 Finally

We echo the JMT comments “there is no detail or explanation as to how this large number of jobs will be created or what they are and any claim such as this must be thoroughly interrogated with regard to its substance:

Are these 50 or 60 full time equivalent or part-time jobs?

Will they exist for the whole time the mine is operational or only when it operates at full production?

Will it be local people or workers from outwith the area that will take them up?

We also believe this question should apply to the economic benefits...

 so again, they should be thoroughly interrogated:

How were the figures arrived at?

What was included in calculating those benefits?

How do they compare with other opportunities that could be created in the area?