

By email to: [Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)

James McKenzie  
Onshore Electricity Policy, Strategic Co-ordination & Consents Division  
The Scottish Government  
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6 March 2023

Dear Mr McKenzie

## **EARBA PUMPED STORAGE HYDRO SCOPING REPORT**

**ECU reference: ECU00004731**

### **Background and Context**

1. Gilkes Energy Limited has applied for a scoping opinion for a pumped storage hydroelectric scheme of up to 900MW, located within Ardverikie Estate, Kinloch Laggan.
2. Mountaineering Scotland is a membership organisation with more than 15,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains. We represent, support and promote Scottish mountaineering, and provide training and information to mountain users for safety, self-reliance and the enjoyment of our mountain environment.

### **Assessment**

3. Mountaineering Scotland's concern at this stage is ensuring that the proposed viewpoints will allow a comprehensive assessment of the proposed development from a mountaineering perspective, and that popular recreational access routes are identified and managed should an application be made.

### **Landscape and Visual Impact**

4. We think that paragraph 7.2.11 significantly underestimates of popularity of the Binnein Shuas climbing crags (Ardverikie Wall) and the three Munros by Loch Leamhain. Comment such as "...the majority of identified recreational routes are deemed to have no visibility towards the Proposed Development" seems based on number of paths, not based on volume of use.
5. We support the Proposed Visualisation Locations indicated in Figure 5.1, and suggest two more that may assist with assessment of visual impacts on the landscape: the east top of Beinn a' Chlachair at 977m (NN486790) and the top of the popular climbing crags of Ardverikie Wall (NN467827)
6. The viewpoint at Beinn a' Chlachair does not have a view of Loch a Bhealach Leamhain, however walkers usually take in the round of three Munros on a single trip and The Munros guidebook

suggests a route between that summit and the summit of Geal Charn, which is omitted from the list of proposed visualisations. This route takes in the east top of Beinn a' Chlachair at 977m, on a shoulder above steep craggy ground overlooking Loch a' Bhealach Leamhain. Walkers are likely to pause here to take in the view before descending steep ground to the col between the summits. A Viewpoint here would allow assessment of potential visual impacts of dam construction and operation, such as the dam head and draw-down zone.

7. The Binnein Shuas climbing crags are hugely popular outcrops for climbers. Climbers will reach the top of the Ardverikie Wall crag around NN467827 and pause there to gather their equipment and look around. A Viewpoint at the top of the crag would assist with assessing the potential impact of the proposed turbine house and operational draw-down of water level around the loch.

### **Land Use and Recreation**

8. Given the popularity for climbing and hillwalking in this area we request that the applicant produce an Access Management Plan for construction traffic and recreational users. From our mountaineering perspective we note the following as key matters that we would wish the applicant to address:

- i. The shared access route across the bridge over the River Spean and following the existing track to Lochan na h-Earba.
- ii. Route and construction of the proposed new footpath south-west of the loch (indicative route).
- iii. Maintenance of access during construction along the north side of Lochan na h-Earba to the climbing crags of Binnien Shuas – this is an informal route that currently leaves the main track at the head of Loch Earba and will need realignment as approximately the first third of it will be in a proposed inundation zone.
- iv. Management of walkers reaching the main track from Binnein Shuas. Many climbers top out above Ardverikie Wall, returning back over the shoulder of Binnein Shuas rather than retrace their steps parallel to the loch – as can be seen on the Strava Global Heatmap.
- v. Maintenance of access during construction along the southern shore of the lochs – this route is sometimes used by people coming off the summits and making their way back.
- vi. Maintenance of access during construction of the route between the confluence of Allt Coire Pitridh and the Geal Charn burn, and Creag Pitridh summit – the main route up or down for Munro baggers.
- vii. Maintenance of access during construction of the route between Beinn a'Chlachair and Geal Charn where it crosses the Bealach Leamhain, above Loch a' Bealach Leamhain – a main route between summits used by hillwalkers.


9. We expect the applicant to make clear in an Access Management Plan the generally accepted principle that any constraints on access would be of minimal extent and minimal duration to achieve the work safely, and that it is accepted that these parameters may change location during the different phases of construction.

### **Noise and Vibration**

10. We request that a Noise Sensitive Receptor be located at the base of the Binnein Shuas climbing crags where climbers gather prior to ascent, around NN468826.

11. We request the EIA to assess the potential effect of blasting on rock stability on climbing routes on the Binnein Shuas crags and on rocks above Loch a' Bhealach Leahmain on the main walking route between the summits of Beinn a' Chlachair and Geal Charn.

Yours sincerely

A handwritten signature in black ink that reads "Davie Black". The signature is written in a cursive style with a large, looped 'D' and 'B'.

**Davie Black**  
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**Mountaineering Scotland**

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