

By email to: [EconsentsAdmin@gov.scot](mailto:EconsentsAdmin@gov.scot)

Energy Consents Unit  
Scottish Government  
5 Atlantic Quay  
150 Broomielaw  
Glasgow G2 8LU

8 April 2024

Dear ECU Team

### **EARBA PUMPED STORAGE HYDRO SCHEME**

**Reference Number: ECU00005062**

1. Mountaineering Scotland wishes to comment, expressing some concerns, on this pumped storage hydropower planning application in the Ardverikie Estate, near to Loch Laggan.
2. Mountaineering Scotland is a membership organisation with more than 16,000 members and is the recognised representative organisation for hill walkers, climbers, mountaineers and snowsports tourists 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.
3. Our interest lies with potential effects on mountaineering interests and the special qualities of the Wild Land Area, specifically in this case the visual impact on landscape views of and from the routes to the summits of the Munros of Geal Charn, Creag Pitridh and Beinn a Chlachair, which surround Loch a' Bhealaich Leamhain, and Binnein Shuas, known for the 'Ardverikie Wall', a rock outcrop very popular with climbers and lies adjacent Lochan na h-Earba. The view of the proposal from Loch Pattack and surroundings is also significant.

#### **General observations**

4. Mountaineering Scotland consulted its members on their opinion of this proposed development in Wild Land Area 14: Rannoch – Nevis – Mamores – Alder. Our members' survey indicated significant concern amongst the hillwalking, climbing and snowsports touring communities about this major civil engineering project in a landscape sensitive to development. Many were firmly against the intrusion into a large area of wild land, with it being of inappropriate scale/extent, and very few areas left free from obvious human development. The effectiveness or cost/benefit ratio for carbon reduction in its construction and use was questioned.
5. Equally, there was also recognition within these communities that this type of hydropower storage facility is needed, and essential for grid stability and decarbonising electricity production in light of climate change. It was noted that dams and tracks are already landscape features in much of

Scotland's hill country and it was recognised that some landscape impact would be inevitable and should be mitigated.

6. Our members indicated that continued recreational access to climbing crags and to the round of Munro summits is very important, both during and after construction. There is a requirement under the Land Reform (Scotland) Act 2003 for the Access Authority to ensure that public access is kept open and free from obstruction, while also identifying land over which access rights are not exercisable.

7. A principle of the Scottish Outdoor Access Code is that restrictions to public access for safety reasons should be limited in extent and duration to what is specifically required to achieve the outcome of reducing risk to a tolerable level. This is relevant for the identification of safe access routes during construction, for climbing and for the Munro summits.

8. For such a large civil engineering project proposed for a Wild Land Area, that should consent be granted it would seem appropriate that regular reports from Ecological Clerks of Works on the Construction Method Statements that come under the umbrella Construction Environmental Management Document be digitally available for public scrutiny during the active span of the construction phase.

### **Specific topics**

#### **Landscape and Visual Impact**

9. We welcome the assessments that the applicant has made on the visual impact of the proposals on the routes taken by walkers to, between and from the round of three Munro summits. The upper reservoir of Loch Leamhain will be a significant change to the landscape. It would be only visible for short periods of time for walkers going between the Munro summits, but the impact of the dam and the water level changes will be significant at this location, changing the feel of the surrounding wild land forever. It is likely to result in a substantial reduction in extent of the landscape qualities expressed in the description of Wild Land Area 14.

10. Of equal significance is the dam wall proposed for the southern end of the new upper reservoir. This would be a significant new-build feature deep in a Wild Land Area. We request the Planning Authority to assess whether the scale of this intrusion is justified and if so, is the mitigation proposed adequate to alleviate visual impacts on the wild qualities of the landscape, as seen from Loch Pattack and surrounding areas. Planning conditions are required to ensure compliance with any mitigation proposed.

11. We request the Planning Authority to carefully scrutinise the conclusions drawn for Visualisation Location 10, Track to Loch Pattack, where paragraph 7.9.21 states that the proposed development will "form a very prominent man-made focal point within an otherwise upland, mountainous context.", and query the conclusion drawn that the effect of the southern dam wall is assessed to be Moderate -Minor Adverse and is therefore not significant.

12. Construction access roads will be a significant new landscape feature and will be seen from routes to and from summits. The separation as much as possible of recreational access paths and construction haulage roads is a principle we wish to see maintained throughout the construction phase.

13. We request the Planning Authority to set clear planning conditions on the design of construction routes, as advised in the good practice guide "Constructed Tracks in the Scottish Uplands" (SNH

2015). We also request the employment of a specialist Landscape Clerk of Works to ensure landscape mitigation for track alignment pre-construction, and post-construction restoration, specified in Construction Method Statements. We request that restoration specifications are clearly stated in any forthcoming CMSs.

### **Recreation and access**

14. We welcome the Draft Access Management Plan that accompanies the planning application, which clearly identifies and addresses the important points of public access to and through the location. We request that the finalised Access Management Plan retains the key important points for recreational access, and that compliance is reported regularly by an Ecological Clerk of Works.

### **Habitat Compensation**


15. We note the 600ha of peatland restoration, reduction in deer densities across the majority of Ardverikie Estate, and over 1000ha of fenced land around the Earba reservoir and surrounding hills provided for woodland restoration. We support initiatives that result in greater habitat diversity and connectivity, and support the regeneration of native woodlands and scrub where the land can naturally support them. Natural regeneration encourages plant growth that has a landscape and genetic fit with the area and can enhance wild land qualities.

16. We are concerned about the extensive deer fencing that would be required for this, and our preference is to reduce herbivore browsing impacts to allow natural tree and shrub growth without fencing, and to plant trees and shrubs where the soil seed bank is known to be depleted. Deer fences will require self-closing gates and stiles with dog flaps to allow for recreational access as identified on the Strava heatmap included by the applicant in the proposal documents.

### **Conclusion**

17. Mountaineering Scotland recognises the significant contribution this proposal would make to sustainability and security of electricity supply, aiding grid stability. We also have significant concerns about the scale of this civil engineering work proposed deep within a Wild Land Area – a diminishing resource in Scotland, and if it is assessed that consent be granted, we request that any proposed mitigation is of the highest standard.

Yours sincerely



D. Black

**Davie Black**  
**Access & Conservation Officer**  
**Mountaineering Scotland**

**T: 07555 769325**

**E: [access@mountaineering.scot](mailto:access@mountaineering.scot)**

