

By email to: Econsents_Admin@gov.scot

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

7th August 2025

Dear Sir/Madam,

Re: Glen Earrach Energy Pumped Storage Hydro (PSH) Project (ECU00005121)

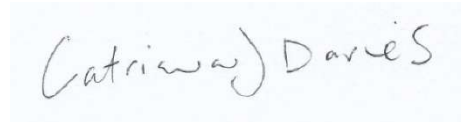
Thank you for the opportunity to respond to this application.

1. Mountaineering Scotland is a membership organisation with 16,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers in Scotland. We represent, support and promote Scottish mountaineering, and provide training and information to mountain users to foster self-reliance and safe enjoyment of our mountain environment.
2. Our interest in large scale energy proposals is in the potential impacts on mountaineering interests, in this case the visual impact on the mountain landscape and the Loch Ness and Duntelchaig Special Landscape Area, from the hillwalking summits of Meall Fuar-Mhonaidh and Glas-bheinn Mhor, which are both Grahams – Scottish hills between 2000 and 2500 feet high. Both summits fall within the red line boundary. The summit of Meall Fuar-Mhonaidh is 270m from the head pond, whilst the summit of Glas-bheinn Mhor is less than 2km away.
3. We are concerned that the Landscape and Visual Impact Assessment does not fully recognise the long-term visual impact of the operation of this scheme.
4. The nature of pumped storage hydro is to utilise the potential energy from the impounded body of water to produce electricity by running the water from the headpond through the turbines in the pump house. This drawing down of water will have the effect of exposing the shores of the headpond previously inundated by the top water level. Repeated inundation and draw down of water will kill the existing marginal vegetation, and drawdown will expose raw substrate of boulders and shingle around the entire margin of the loch.
5. The Visual Assessment for viewpoint 1: Meall Fuar-mhonaidh summit mentions the proposed development would not interrupt the view of Glas-bheinn Mhor in the middle ground or the distant views of the mountains which define the skyline and we accept this is correct. However, hill walkers will be very aware of the contemporary, man-made intrusions within their immediate surroundings.
6. The exposed raw substrate of boulders and shingle around the entire margin of the loch when waters levels are below top water level will accentuate the artificial nature of this man-made structure.

7. The Visual Assessment goes on to suggest that at top water level the headpond would appear similar to other upland lochs within the view. Based on our experience of other hydro dams in Scotland, I can assure this will not be the case. The artificial shape of the headpond, the lack of marginal vegetation, and the presence of made-made structures will make it clear to any observer the headpond is not a natural feature.

I trust these comments are useful.

Yours sincerely

A handwritten signature in blue ink that reads "Catriona Davies". The signature is written in a cursive style with a light blue background.

Catriona Davies
Access & Environment Officer
Mountaineering Scotland
Email: access@mountaineering.scot

