

11 April 2025

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

Dear Sir/Madam,

Objection to the Fearn Pumped Storage Hydro Project near Kingie Lodge, Glengarry

ECU Reference: ECU00005061

Mountaineering Scotland wishes to formally object to the application for consent under Section 36 of the Electricity Act 1989 for the proposed Fearn Pumped Storage Hydro Project near Kingie Lodge, Glengarry. Our objection is based on the significant adverse impacts the development would have on Scotland's mountain landscapes, recreational access, and the interests of hillwalkers, climbers, and other outdoor enthusiasts.

Mountaineering Scotland is a membership organisation with over 16,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and snowsports 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.

Mountaineering Scotland supports the move to a low carbon economy but does not believe that this need be at the expense of Scotland's marvellous mountain landscapes. It objects only to the small proportion of proposals that are potentially highly damaging to Scotland's valuable mountain assets.

1. Impact on Wild Land and Scenic Value

The proposed development is situated within a wider region of high landscape value, including areas designated as Wild Land Areas (WLAs) and National Scenic Areas (NSAs). This project, including the large reservoir, dam, power station, extensive road networks, and associated infrastructure, would irreversibly alter the character of this wild and remote landscape. The dams are within a WLA and the visual intrusion of large-scale industrial infrastructure would be incompatible with the natural, unspoiled character of the upper slopes.

Although NPF4 allows energy infrastructure within WLAs this is not an unqualified exemption and, in this case, the adverse impact of the highly visible dams, especially the Coire Dubh dam, outweigh the energy benefits. This is not a 'natural' site for such infrastructure, as is shown by the heavy engineering required to create the upper reservoir.

The visual assessment is unduly favourable towards the application. The accompanying visualisations are unrealistically benign, particularly those illustrating the supposed weathering in after 15 years. The dams will take much longer to weather in (while always remaining massive structures) while the draw-down zone will never weather in, as is evident from the tidelines around conventional hydro reservoirs around Scotland. Indeed, the application itself references in mitigation of the Fearna proposal the drawdown scar of Loch Quoich (the lower reservoir) which hasn't weathered in after 70 years of operation (Para 1.5.4).

2. Recreational and Tourism Impact

This area is a valued destination for mountaineers, hillwalkers, and climbers, contributing significantly to Scotland's outdoor tourism industry. The construction and operation of the proposed hydro scheme would disrupt access to popular mountain routes, including those leading to Munros such as Sgùrr nan Conbhairean and Gleouraich. The associated noise, traffic, and visual disruption would diminish the experience of remoteness and tranquillity that attracts outdoor enthusiasts to this region. The notion that the impact on walkers might be mitigated by new views where the track is routed across the dam, when they are climbing to much higher and better viewpoints, is laughable.

3. Cumulative Impact with Other Developments

The Fearna Pumped Storage Hydro Project must be considered within the broader context of ongoing energy developments in the Highlands. The cumulative visual and environmental impact of multiple hydro and wind power projects in sensitive mountain environments threatens to erode the natural character of Scotland's wild places. If approved, this project would contribute to the growing industrialisation of previously unspoiled landscapes, contrary to national and regional policy objectives on landscape conservation.

4. Environmental and Ecological Concerns

The construction phase of the project would involve extensive earthworks, road building, and large-scale excavation, leading to significant habitat disruption, loss of biodiversity, and potential impacts on watercourses. Peatland disturbance associated with such large-scale infrastructure projects exacerbate carbon emissions, undermining the Scottish Government's climate change targets.

5. Alternative Approaches to Energy Generation

Mountaineering Scotland recognises the need for renewable energy generation and storage; however, we urge the Scottish Government to prioritise developments that do not compromise Scotland's valuable mountain landscapes. Alternative locations with lower

landscape sensitivity should be considered to balance energy needs with environmental and recreational interests.

Conclusion

Given the significant adverse impacts on landscape character, the natural environment and recreational interests, Mountaineering Scotland strongly objects to the Fearn Pumped Storage Hydro Project. We urge the Scottish Government to refuse consent for this application and to safeguard Scotland's wild places for future generations.

Yours sincerely



Stuart Younie

CEO, Mountaineering Scotland

