

By email to: EconsentsAdmin@gov.scot

Energy Consents Unit
Scottish Government
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21 February 2024

Dear ECU Team

LOCH KEMP PUMPED STORAGE HYDRO SCHEME

Reference Number: ECU00003398

Thank you for the opportunity to comment on this pumped storage hydropower proposal above Loch Ness.

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 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.

Our interest lies with potential effects on mountaineering interests, specifically in this case the visual impact on landscape views of the Loch Ness and Duntelchaig Special Landscape Area, from the hillwalking summit of Meall Fuar-mhonaidh. This summit is just over 5km (approx 3 miles) distant from the proposed development.

We have concerns that the Landscape and Visual Impact Assessment underestimates the operational impact of this proposal, through the lack of clarity and reasonable analysis of the potential impact around the entire loch shore of the drawdown of water when the reservoir is in operation.

The EIA states that the new operational reservoir will have a surface water level raised 28m above the current natural level. The nature of pumped storage hydro is to utilise the potential energy from the enlarged impounded body of water to produce electricity, by running the water from the upper reservoir through the turbines located in the proposed pump house.


This drawing down of water will have the effect of exposing the area of land previously inundated by the maximum capacity level. High level inundation will kill the existing marginal vegetation, and drawdown will expose raw substrate of boulders and shingle around the entire margin of the loch. Walkers in this landscape are highly susceptible to contemporary man-made intrusions and the sensitivity of their perceptions may be more than the LVIA recognises.

The LVIA states (8.10.37) that because Loch Kemp is already an existing feature in the landscape, the characteristics of the increased waterbody would not detract from the existing baseline conditions. At maximum water levels this is a reasonable assertion to make. It goes on to say (8.10.45) that in the long-term, once construction activities have ceased and mitigation planting has established and matured, it is expected that all visual effects would be reduced to levels that are not significant.

This fails to take into account the fluctuation of water levels that are the main feature of operational pumped storage hydropower schemes. The EIA report omits to provide an indication of how long it is expected that water will remain at the maximum high level, and how often and for how long drawdown that exposes the loch shore will occur. This is dependant on electricity demand, but assessments may be made from existing PSH schemes in Scotland.

We ask The Highland Council to consider what the exposure of the drawdown landscape scar would look like in relation to the special qualities of the SLA, before making any judgement on the potential impact of this scheme on the landscape qualities of the surrounding area.

Yours sincerely



A handwritten signature in black ink that reads "D. Black". The signature is written in a cursive style with a small vertical line to the left of the first letter.

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