**John Muir Trust pre-application response - Earba Pumped Storage Hydro Scheme (ECU ref. ECU00004731)**

This document outlines the John Muir Trust’s initial response to the Earba Pumped Storage Hydro Scheme (ref. ECU00004731) (the ‘Proposed Development’) at pre-application stage. We are interested in the Proposed Development because of the potential impact it could have on an area of high-quality wild land, specifically the Mamores-Alder-Rannoch Wild Land Area.

We welcome the willingness of the Applicant and Ardverikie Estate to engage with us about our concerns and recognise that efforts have been made to sensitively design the Proposed Development. However, there are limits to how far significant impacts caused by industrial scale development in environmentally sensitive wild places can be avoided or lessened. We have significant concerns that the Proposed Development would have an unacceptable impact on wild land, our key concerns are set out below:

**Quality of the wild land**

The proposed site is one of Scotland’s best examples of wild land. The wild quality of the area is recognised as a characteristic of the Ben Alder, Laggan and Glen Banchor Special Landscape Area within which the development would sit. The wildness of the designated area is recognised as a key characteristic, and this is enhanced by the intervisibility with the surrounding wild land. The construction and operation of industrial scale infrastructure would disrupt the peace, tranquillity and sense of expansiveness of this wild place.

A particular value of this area of wild land is the accessibility. During a site visit with Gilkes Energy in March 2023 we witnessed a number of people walking and cycling through the proposed site and we are aware that Lochan na h’Earba is well loved by both visitors and the local community as a location for camping, climbing and canoeing. The Proposed Development would drastically change this landscape and the feeling of wildness which attracts people will be lost, and with it the important wellbeing as well as economic opportunities the area provides.

**Nature of the development**

The industrial scale of the Proposed Development means its impact in a sensitive wild place would be significant. Due to the massive scale of the project, the proposed site will effectively turn into a building site for the 4 years anticipated for construction. Once constructed, it would inevitably alter the landscape. By flooding Lochan na h-Earba and the area of grassland between the two lochs (which is a favourite camping spot for many) and introducing large-scale infrastructure into an area largely absent of human artefacts, the sense of naturalness would be destroyed.

In addition, the continuous presence (including regular visits to the powerhouse, weekly visits to the dams, non-routine and scheduled major maintenance (potentially extending to several week/months), periodic inspections of the underground tunnel and maintenance of access tracks and other infrastructure) at the Proposed Development would destroy the sense of sanctuary in the area, a key characteristic of the Mamores-Alder-Rannoch Wild Land Area. As such, we disagree with the Scoping Report that the effect of the operational traffic will be negligible.

**Access tracks**

The access tracks, which we understand could potentially have a 6m running width, are a key aspect of the substantial effect the Proposed Development would have on this area of wild land. As well as the visual impact, access tracks can result in a loss of important habitat (including peatland) and change the character of an area. Remoteness is an important wild land quality and features in many of our finest examples of wild land across the UK, introducing access tracks destroys this feeling of remoteness.

The access tracks associated with the Proposed Development would significantly impact the character of the area which due to the landform, and lack of visible human artefacts, has a feeling of naturalness and remoteness; this is a particularly valuable quality in an area, like the proposed site, which is still accessible. The impact of the access tracks will be exacerbated by the regular traffic required to maintain a continuous presence at the Proposed Development.

**Drawdown scars**

We understand that drawdown scars are an inevitable consequence of this type of development and cannot practically be mitigated. This effect will create a visual focus in the landscape and will be continuously present, whether at Lochan na h’Earba (which would become the ‘Lower Reservoir’) or Loch a’ Bhealaich Leamhain (which would become the ‘Upper Reservoir’) as water is moved between the two lochs. The drawdown scars will be particularly significant at the proposed site because of the gradual slopes around both the lochs and the notable difference in the level of each as they are raised and lowered.

**Conclusion**

We will continue to monitor the development and will await more information at the application stage. At this initial stage we don’t believe that the significant impact on this sensitive area can be mitigated and we are concerned that the Proposed Development would have an unacceptable impact on the natural environment and a special wild place.