

## **Proposed land reclamation at Altanavaig Quarry, Kyleakin, Isle of Skye IV41 8PQ**

### **ENVIRONMENTAL APPRAISAL**

#### **Background**

Altanavaig Quarry is owned by Mowi Scotland Limited, who purchased the site to accommodate development associated with their marine cage fish farming business. They have developed part of the site to construct a large fish feed manufacturing facility and associated office accommodation, which work was completed in 2019. That work included some foreshore land reclamation work.

In 2022, Mowi invited the licence applicant, Vonin Scotland Limited, to establish a net washing and servicing facility on a part of the Altanavaig Quarry site in their ownership. A lease agreement for the proposed development areas has been agreed between Mowi and Vonin and will take effect subject to Vonin obtaining the permissions necessary in order to legally develop the proposed facility. Those permissions include obtaining a licence from Marine Scotland for the proposed land reclamation works to be carried out below the mean high water springs (MHWS) level. The proposed land reclamation is necessary in order to provide an area large enough to accommodate the proposed net washing facility and is a continuation of the extent of land reclamation previously licenced by Marine Scotland (Licence Number 06406/19/1) and carried out by Mowi. Establishing the net washing facility at the foreshore and adjacent to the existing slipway is considered essential in order to allow the delivery of fouled nets to the facility by sea and afford their efficient and bio-secure transfer to the net washing station. Additionally, sea water is required during the washing process and the foreshore location will allow the convenient and energy efficient abstraction of sea water in order to serve the facility's needs.

#### **Site History**

Local knowledge suggests that sand and gravel extraction at Altanavaig commenced in the 1960's in the area adjacent to where this land reclamation is proposed. In addition to the sand and gravel abstraction activity there was also a concrete batching plant and block making facility sited in that general area.

In the early 70's Howard Doris gained control of the site to produce aggregates and pre-cast concrete elements for the Ninian central platform construction at Kishorn. Again, the eastern area where the net washing facility is proposed was used for the drying and curing of the pre-cast concrete elements, but the concrete batching plant was located where the Mowi feed mill now stands as the sand and gravel required for concrete production were by then being extracted from that area.

After the Kishorn construction was completed the quarry lay semi-dormant for a while, with only small quantities of sand and gravel being constructed. On occasions the pier, which had been constructed to enable the shipping of materials from the site to Kishorn, was utilised to enable sand and gravel to be shipped from the site.

It is understood that Redland Aggregates leased the quarry from the administrators of Howard Doris in the late 80's and they sought permission at that time from the then Highland Regional Council to extend the quarry area to allow the extraction of greater quantities of sand and gravel. That permission was granted on 1 May 1992. This resulted in the quarry area being extended to the area where it continues to this day.

Two major contracts supported by the production from the quarry were the construction of the submarine base at Coulport and the construction of the Skye Bridge.

In the late 90's Redland were taken over by Lafarge of France, who in turn leased the area to Callum Morrison. Marine Harvest (now Mowi) purchased the site in 2016. The quarry is now operated by MGL.

Marine Harvest applied for planning permission in 2016 for the construction of a fish feed production plant and new pier in 2016. That permission was granted on 2 March 2017.

On 2 November 2018 permission was granted for an office, store and shellfish holding facility to Keltic Seafare. That business was established but the facility has now been mostly dismantled.

Further permissions were granted to Mowi on 14 March 2019 for the erection of the processing plant staff accommodation and on 6 April 2020 for the erection of a warehouse for feed storage, both of which have been constructed and are operational. On 29 January 2021 Mowi obtained hazardous substance consent for the storage and use of liquified natural gas, and that facility is also now in use.

### **Planning policy context**

The site is allocated for industrial development by the Highland Council as follows:

#### West Highland and Islands Local Development Plan 2019 (West Plan)

Policies KA04: Altanavaig Quarry – Allocated for Industry

There are also specific policies in the Highland-wide Local Development Plan 2012 which are relevant to these proposals, namely:

Policy 42 – Previously Used Land

Policy 49 – Coastal Development

A planning application has been made to the Highland Council (23/00061/FUL) for the whole proposed development, including the proposed land reclamation.

### **Relationship to designated sites**

The terrestrial site has no special designations.

The adjacent marine environment has the following special designations:

- Lochs Duich, Long and Alsh MPA (10416) – protected features burrowed mud and flame shell beds
- The Inner Hebrides and the Minches SAC (10508) – protected feature harbour porpoises
- The Lochs Duich, Long and Alsh Reefs SAC (8309) – protected features reefs and horse mussel beds
- The Loch Carron MPA (10543) – protected features flame shell beds and maerl beds

The Kyle – Plockton Special Landscape Area also just borders the proposed development site.

### **The land reclamation proposal**

The following two photographs indicate the areas where the land reclamation is proposed:





As can be seen from the first photograph, land reclamation has been carried out on the site previously, but two bays were left un-reclaimed. These proposals seek to extend the line of the previous land reclamation to continue it through the western bay and onward to the line of the rock outcrop identified in the second photograph.

As can also be seen in the photographs, both areas have been previously impacted by prior activity at the site. The reclamation will take place within the inter-tidal zone. The majority of the proposed land raising activity is above MHWS, but as can be seen in the topographical section plan reference CTCH-J4682-001-01 submitted with the application there is a 10 metre strip of land reclamation below MHWS for which licence is sought. The total combined area of land reclamation below MHWS is 625 m<sup>2</sup> and the total tonnage of material to be deposited below MHWS will be approximately 1,000 tonnes.

### **Working Method**

As can be seen in the topographical section plan CTCH-J4682-001-01, it is proposed to place rock armour at the outward extent of the proposed reclamation and then place and compact stone behind it to raise the land to the required finished ground level. Only clean stone obtained from the quarry site will be used in this process, and there is already sufficient rock armour, clean stone and crushed rock stockpiled elsewhere within Mowi's site reserved for this purpose. After placement of the first layer of rock armour the first lift

up to MHWS level will be achieved using clean boulders and cobbles in order to minimise the potential for fine silts to be washed into the sea. Once that first lift has been completed, a separating layer of geotextile will be laid above the cobbles/ boulders before further layers of crushed rock are deposited and compacted with successive lifts of rock armour until the finished ground level has been achieved.

The rock will be transported within the site by dumper truck and the rocks will be placed/ spread utilising a c20 tonne tracked excavator which will be ensured to be free of oil leaks. No vehicles will operate within the sea and only clean rock will be used in the reclamation. Specifically, no waste will be used in the reclamation.

In summary, the controls to be employed to prevent any impact to the protected features are:

- The use only of clean stone already stored at Altanavaig Quarry (the length of storage obviates any risk of marine invasive non-native species)
- The use of clean and well maintained plant and equipment
- Transport of the stone within the quarry over land and no use of any marine vessels as part of the reclamation works
- No working at all of any plant and equipment within the sea
- Incorporation of a geotextile barrier to prevent the wash-out of finer material

### **Potential for Environmental Impact**

The area to be reclaimed is not pristine seabed. As can be seen in the included photographs, it has been impacted by previous industrial activity and is essentially clean rock/ stone and absent any marine habitat. The clean rock to be utilised in the reclamation activity already exists within the quarry area and requires to be transported only a short distance within the site to the reclamation areas. Because it is already stored on-site on dry land there is no risk from the importation of any marine invasive non-native species. The working method will ensure that no fine material will be washed into the sea and only a well maintained excavator will be used. No vehicles will work in the sea.

Because no work is planned within the sea and the adjacent marine protected features are reefs, muds, maerl beds, flumes shells and horse mussels, it is considered unnecessary to carry out any noise impact assessment.

The topographical sections submitted with the application show how the works below MHWS marry with those above.

By adopting the specified working method and employing best practice, there will essentially be no potential for any significant environmental impact to arise from these proposed land reclamation works.