



9 January 2007

Our Ref: HSL/G1

Nikki Milne
Scottish Executive and Rural Affairs Department
Marine Management Division
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Victoria Quay
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Dear Madam

CMNP Consultation

We have read with interest the consultation documents on the proposals for a Marine National Park in Scotland and I am pleased to set out some comments on behalf of Aggregate Industries.

Aggregate Industries, through the acquisition of Foster Yeoman Limited, operates the UK's only coastal "super quarry" at Glensanda, Morvern. The site is on the Morvern Peninsular, on the west side of Loch Linnhe and within both the Argyll Islands and Coast, and the Lochaber and South Skye Indicative Areas. These are the two most favoured areas for Marine National Park status. The company also operates quarries throughout the Western Isles and we are responding separately on these.

Glensanda Quarry directly employs 200 people and generates a total business turnover in excess of £100 million per annum. Annual revenue expenditure at the site is around £15 million, of which £5 million is paid as wages and salaries. The majority of the workforce lives within daily travelling distance of the site. In an area where employment is dominated by seasonal tourism and the public services Glensanda represents one of, if not the, most important sources of industrial employment.

Glensanda is now a nationally important source of construction aggregates, supplying markets within Scotland, England and Europe. As traditional sources of aggregates elsewhere become increasingly difficult to maintain the output at Glensanda is expected to rise from the current 7 million tonnes p.a. towards the maximum permitted 15 million tonnes per annum.

All the crushed rock from the quarry is distributed by sea in three company owned ships, two of 95,000 dwt and one of 36,000 tonnes dwt. Other vessels are chartered as and when required. Foster Yeoman Limited is the statutory harbour authority for Glensanda with harbour limits extending out into Loch Linnhe. Many of the port destinations for Glensanda ships are in Europe and the south east of England for which the optimum route is via the Sound of Mull and the Minch, but there is also an increasing proportion of output shipped into Scottish markets.

The planning permissions for the quarry run until 2042 but there are current permitted reserves that, subject to an extension of the duration of the permissions, will allow the operation to continue well beyond this date. By concentrating a large output at one site, and with all the output distributed by sea, Glensanda represents one of the most sustainable supply options for aggregates supply within the UK.

Given the significance of the quarry we are surprised that Foster Yeoman was not a consultee to the CMNP proposals and are therefore concerned that the implications of the proposals for the operation have not been fully appreciated.

The three principle requirements for a coastal quarry are a deposit of suitable rock to be quarried, adjacent sheltered deep water berthing and an accessible source of skilled employment. These sites are few and far between but the principle of such sites has been supported in National Planning Policy for Scotland from the 1980's and this policy support is taken forward in more detail by the Highland Council Structure Plan. Although minimising landscape impacts is at the heart of approved schemes for the working and restoration of the quarry, the fact remains that Glensanda is not within any formal landscape designation (there are designated areas in the vicinity that are taken into account). This has meant that the Highland Council, in consultation with SNH, has been able to take a strategic and balanced view of the proposals at Glensanda and we are extremely concerned that this planning role should not be taken away from that authority.

The stated aims of Marine National Park status include conserving the landscape and the historic legacy and promoting tourism and tourist related activity. This will inevitably create a tension with other forms of development, just as it does within existing national parks where mineral extraction is an important industrial activity but is now under great policy pressure, restricting development to very limited criteria. Glensanda was developed as part of a policy response to these pressures. There will be ongoing planning applications for development associated with the quarry and, whilst environmental impact will continue to be assessed and minimised through formal Environmental Impact Assessment, this does not have to be within the context of National Park status.

We think it would be helpful to clarify that operations such as Glensanda will not be included within any National Park area. Furthermore, a park boundary that skirts the perimeter of the activity will not avoid the conflict of development within the proximity of, and affecting the setting of, a national park - the two need to be kept apart.


Although Glensanda is located within two of the potential park areas, shipping to and from the quarry could pass through most of the potential park areas. Whichever area is chosen this shipping activity must be allowed to continue. If additional sailing distance is required to avoid a marine park area this will not only add to the cost of distribution, it will increase fuel consumption and CO₂ emissions. This raises the importance of recognising and protecting established commercial interests, and enshrining this within the terms under which national park status is conferred.

Undoubtedly national park status could confer benefits to an appropriate area. Equally the terms of reference will inevitably restrict new development and could be highly damaging to established and important commercial interests, where development is currently acceptable and highly regulated through planning and environmental legislation. A review of this legislation would have been a helpful exercise as part of the consultation process so that the perceived benefits of national park status could be properly assessed. Furthermore, there is already the Sustainable Marine Environment initiative ongoing with pilot studies that include the Sound of Mull. This little publicised initiative, if taken forward, could establish many of the conditions promoted under the National Park proposals and should have been discussed in the marine Park consultation documents.

We are not objecting to the principle of national park status for carefully selected and focused areas where the perceived conservation and economic benefits could apply. However, this must not be implemented in way that harms existing and potential economic development that is currently supported by local and national policy in Scotland.

Yours faithfully

Nicola Kester

 Hugh Lucas
Aggregate Industries