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Planning and Building Standards Highland Council
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To whom it may concern,

Plockton and District Community Council wishes to comment on the following applications:

App No: 20/03541/FUL - Extension to dry dock and change of use land to allow decommissioning of marine structures. Construction of access road on Land At Kishorn Base Kishorn

Related Documents

Marine Scotland license 07111 referring to Crown Estate lease 73-74-RC2

Scotland's National Marine Plan 2015 - Section 6 - Part 3

Background

Plockton and District Community Council welcome the appropriate development of Kishorn Port where it does not impact on traditional activities.

We are aware of original plans which were consulted on and supported as part of the renewable energy supply chain.

The Planning Applications listed above represents a significant departure from the original intentions. In our view it is essential that a full consultation is undertaken with residents, the fishing community and others who will be affected by this development

In particular we are concerned about restrictions to access and use of the sea area of Outer Loch Carron and Loch Kishorn.

In so far as KPL have recently renewed their Marine Licence for thirty two moorings in three extensive areas on the North shore of Outer Loch Carron, it

must be assumed that these moorings will be used for vessels awaiting attention at KPL. This will greatly increase the vessel movement and activity in the loch and increase the size and variety of vessels. The planning application is for vessels up to 250 metres long.

The mooring of these vessels together with any exclusion zone will serve to remove traditional fishing grounds for the local fishermen. Typically, an exclusion zone of 500 metres is applied to offshore structures.

The movement of these large vessels together with their tugs and support craft through Outer Loch Carron Loch Kishorn requires a transit through traditional static gear fishing grounds. It is the nature of static gear prawn fisheries that the fishing equipment is surface buoyed for deployment and recovery. The whole sea area of Outer Loch Carron and areas of Loch Kishorn are covered by a pattern of fishing buoys.

Large vessels either towed or under their own power are limited in their ability to manoeuvre particularly in the confines of Outer Loch Carron and Kishorn.

It is inevitable that during transit they will cause considerable damage to fishing equipment deployed in the loch.

This will further remove access to traditional fishing grounds.

During recent vessel movements fishing equipment has been lost and destroyed.

The fishing community are also concerned that the risk of unintentional discharge from moored or transiting vessels and consequential pollution to the local environment may impact on the long-term viability of local fishing stocks.

The village of Plockton supports eight fishing boats and the livelihood of thirteen fishermen and their families. Whereas we accept that there may be a limited number of jobs created at KPL as result of the planning application. There has been no consideration given to the impact of the planned extension on traditional existing employment in the area.

Plockton and District Community Council represent a successful fishing community.

Objection

In summary the Community Councils objection is that this planning application has not taken into consideration the impact on communities which rely on traditional access to Outer Loch Carron and Loch Kishorn or the potential long-term impact of pollution on this fragile environment.

The planning applications represent a significant change to current planning consent. In addition, we consider that the planning application should not be approved without a formal economic and environmental impact assessment involving all local interests.

App No: 20/03541/FUL

Objection

Failure to consult

Significant variation from existing permissions

Environmental concerns

Adverse effect on traditional employment

Marine Scotland license 07111 referring to Crown Estate lease 73-74-RC2

The adverse effect of the planning applications on the areas covered by the Marine Scotland licences must be considered when determining the planning decision.

We note that the licence issued by Marine Scotland in 2020 was issued without any consultation with the fishermen or the coastal communities of Loch Kishorn and Outer Loch Carron. In addition, we note that it relies on an environmental statement dated 2013.

We are writing separately to Marine Scotland with our concerns.

Conclusion

Highland Council has a duty to properly consult with local communities and needs to do so in this case.

David McGhie

Chairman Plockton and District Community Council