Event Summary Report

Aquaculture Processes for Streamlined Planning
Battleby 25th November 2010

Event organiser: SNH in association with the Scottish Government and Epsilon Resource Management Ltd

Funded by: SNH and Scottish Government

Report authors: Richard Slaski, Epsilon Resource Management Ltd and Suzanne Henderson, SNH

The aim of this report is to record and capture the essence of the event, so that those who participated, planned and presented it can review and reflect on what happened on the day, what we learnt and how we can apply our learning. It is also intended to provide a summary of the day for those who couldn't attend.
<table>
<thead>
<tr>
<th>CONTENTS</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Introduction</td>
<td>3</td>
</tr>
<tr>
<td>2 Background</td>
<td>3</td>
</tr>
<tr>
<td>3 The Structure of the Workshop</td>
<td>4</td>
</tr>
<tr>
<td>4 Delegate Feedback</td>
<td>5</td>
</tr>
<tr>
<td>5 Pre-application Discussion Session</td>
<td>6</td>
</tr>
<tr>
<td>6 EIA Template Session</td>
<td>7</td>
</tr>
<tr>
<td>7 Shellfish Session</td>
<td>8</td>
</tr>
<tr>
<td>8 Summary, Discussion &amp; Recommendations</td>
<td>8</td>
</tr>
<tr>
<td>ANNEXES</td>
<td>13</td>
</tr>
</tbody>
</table>
1 INTRODUCTION

This report presents the proceedings and key outcomes from the Aquaculture Workshop organised by Scottish Natural Heritage (SNH), held at Battleby on the 25th November 2010. It has three main purposes:

- To provide SNH with an assessment of the effectiveness of the workshop, and to make recommendations for any similar events that might be considered by any organisation involved in aquaculture planning issues in the future
- To provide delegates, both public and private sector, with a summary of the main learning points that emerged during the course of the workshop, taking into account areas of concern or issues that require further guidance/clarification, and including recommendations for best practice in terms of:
  - Pre-application discussion (PAD)\(^1\)
  - Use of EIA screening and scoping templates
- To provide evidence on experience with use of the EIA templates to a parallel primary research project that has been commissioned by the Scottish Government

The report has been prepared with assistance from SNH staff, who co-authored the body of the report, and who provided:

- The final delegate list (Annex 1)
- The evaluation of Feedback Forms (Annex 2)

2 BACKGROUND

2.1 Aims of the Sharing Good Practice (SGP) Event

Workshop Aims

The overall aims of the workshop are to share experiences and learn lessons amongst stakeholders to improve efficiency in the pre-application discussion and EIA screening/scoping processes.

The specific aims of the event are to enhance the aquaculture industry and its regulators and stakeholders’ understanding of:

- Who does what, when and why for the non-statutory pre-application discussion process, and what its benefits and challenges might be
- Who does what, when and why when using EIA screening and scoping templates
- Good practice in supplying the type and amount of information required for inclusion in EIAs at screening or scoping
- The reasons why certain key information is required
- The reasons why some information is not required, and therefore irrelevant to the EIA process.

---

\(^1\) PAD is a non-statutory informal process involving dialogue between developers and regulators and, where appropriate, other interested parties. It should not be confused with Pre-application Consultation (PAC), which can be statutory (for major developments), but which is in any event more formal, involving written comments by all parties concerned.
2.2 SGP Event Objectives

The objectives of the SGP event are to:

- Provide a delegates with examples of how pre-application discussion is used to a greater or lesser extent by key public agencies and regulators
- Provide delegates with workshop discussion sessions aimed at refining understanding about the benefits and possible challenges involved in pre-application discussion
- Provide an experienced overview of the use of Templates for the EIA process in Scottish aquaculture
- Provide delegates with team-based workshop learning experience opportunities in terms of the EIA screening/scoping template
- Introduce delegates to the SNH aquaculture team and relevant Area Officers, with a view to reinforcing the opportunity for seeking pre-application advice and guidance
- Provide delegates with a broad networking opportunity, whilst keeping the focus on issues related to pre-application discussion and use of the EIA Templates.

3 THE STRUCTURE OF THE WORKSHOP

The workshop was hosted by SNH and co-facilitated by the ERM\(^2\). The programme for the day was developed in advance, with ERM and SNH collaborating by way of face to face meetings and email exchanges, under the general guidance of an Event Planning Group (Annex 4). The programme was sent to registered delegates in advance. Some adjustments were made during the day, as circumstances dictated, but the broad programme was:

<table>
<thead>
<tr>
<th>START</th>
<th>END</th>
<th>SUBJECT</th>
<th>LEAD</th>
</tr>
</thead>
<tbody>
<tr>
<td>0930</td>
<td>0950</td>
<td>Coffee and Registration</td>
<td></td>
</tr>
<tr>
<td>0950</td>
<td>0955</td>
<td>Welcome and Housekeeping</td>
<td>Richard &amp; Suz</td>
</tr>
<tr>
<td>0955</td>
<td>1010</td>
<td>Chairman's Introduction</td>
<td>Dominic Counsell</td>
</tr>
</tbody>
</table>

**PRE-APPLICATION DISCUSSION (PAD) SESSION**

<table>
<thead>
<tr>
<th>START</th>
<th>END</th>
<th>SUBJECT</th>
<th>LEAD</th>
</tr>
</thead>
<tbody>
<tr>
<td>1010</td>
<td>1020</td>
<td>Panel Member 1 - Scottish Government</td>
<td>John O'Brien</td>
</tr>
<tr>
<td>1020</td>
<td>1030</td>
<td>Panel Member 2 - Local Planning Authority</td>
<td>Richard Kerr</td>
</tr>
<tr>
<td>1030</td>
<td>1040</td>
<td>Panel Member 3 - SEPA</td>
<td>Ewan Gillespie</td>
</tr>
<tr>
<td>1040</td>
<td>1050</td>
<td>Panel Member 4 - MSS</td>
<td>Matt Gubbins</td>
</tr>
<tr>
<td>1050</td>
<td>1100</td>
<td>Panel Member 5 - SNH</td>
<td>Suz Henderson</td>
</tr>
<tr>
<td>1100</td>
<td>1115</td>
<td>PANEL Q&amp;A</td>
<td>ALL; RJS to facilitate</td>
</tr>
<tr>
<td>1115</td>
<td>1130</td>
<td>COFFEE</td>
<td></td>
</tr>
<tr>
<td>1130</td>
<td>1215</td>
<td>WORKSHOP 1 - 6 teams</td>
<td>SNH Team Facilitators</td>
</tr>
<tr>
<td>1215</td>
<td>1245</td>
<td>Team feedbacks - main lessons learned</td>
<td>RJS; Team spokespeople</td>
</tr>
<tr>
<td>1245</td>
<td>1330</td>
<td>LUNCH</td>
<td></td>
</tr>
</tbody>
</table>

**EIA SCREENING/SCOPING TEMPLATE (SHELLFISH EQUIVALENT) SESSION**

<table>
<thead>
<tr>
<th>START</th>
<th>END</th>
<th>SUBJECT</th>
<th>LEAD</th>
</tr>
</thead>
<tbody>
<tr>
<td>1330</td>
<td>1345</td>
<td>Introduction &amp; Key Points</td>
<td>Colin Wishart</td>
</tr>
<tr>
<td>1345</td>
<td>1355</td>
<td>Finding Information About Locations</td>
<td>Moira Hogg</td>
</tr>
<tr>
<td>1355</td>
<td>1455</td>
<td>WORKSHOP 2 - EIA 5 teams</td>
<td>SNH Team Facilitators</td>
</tr>
<tr>
<td>1455</td>
<td>1510</td>
<td>WORKSHOP 2 - Shellfish 1 team</td>
<td>SNH Team Facilitators</td>
</tr>
<tr>
<td>1510</td>
<td>1540</td>
<td>Team presentations to Plenary</td>
<td>RJS; Team spokespeople</td>
</tr>
<tr>
<td>1540</td>
<td>1555</td>
<td>Concluding remarks</td>
<td>Dominic Counsell, John O'Brien</td>
</tr>
<tr>
<td>1555</td>
<td>1600</td>
<td>Fill in Feedback Forms</td>
<td>All</td>
</tr>
</tbody>
</table>

\(^2\) Epsilon Resource Management Ltd: Richard Slaski

Sharing knowledge, skills and experience
All the presentations during the day are available on the SNH website\textsuperscript{3}. It is important to read these in conjunction with this report, since they provide a significant amount of the detailed context that informed the workshop discussion sessions and team exercises, and therefore the outcomes that are recorded below.

4 **DELEGATE FEEDBACK ON THE WORKSHOP**

Verbal feedback was received towards the end of the workshop, and this was augmented by feedback forms that were completed by all the delegates. The numerical evaluation of these forms is summarised in Annex 2. Two types of feedback forms were used, one for contributors on the day, and the other for delegates. Not all delegates managed to complete the feedback forms, and a total of 29 delegate forms and 7 contributor forms were analysed.

The main messages about the workshop itself were:

- There was universal praise for the venue and for the assistance and courtesy showed by all the SNH staff involved. The catering was also singled-out for praise by many delegates
- All attendees seemed to have enjoyed the day, and acknowledged taking away some best practice experience
- All contributors found the day helpful and informative, with comments including:
  - Went well – clearly huge amount of preparation ensured the event went smoothly.
  - The briefing for facilitators was comprehensive and clear.
  - Relevant subject area, good balance between topics, good pace and structure.
  - Course materials and case study very good.
  - Workshops went well. Almost enough time for those and good levels of contributions.
  - The day went very well. I found the PAD session went across well and gave a clear understanding of process and key issues.
  - Lots of issues highlighted and discussed – some key themes/issues.
  - Difficult to get discussion going early on in workshop which meant time was short at end.
  - Some reluctance to give opinion but some good points given eventually.
  - A lot of valuable comments were provided on the planning and EIA process.
  - Very good venue and support from SNH staff.
  - Encountered frank and open exchange of views.
  - New issues were brought to fore, that had not been previously.
  - Useful for DPRA process in that common issues were identified for the 1\textsuperscript{st} time.
  - Panel questioning didn’t go well. Audience had been killed by powerpoint already.
  - Feedback to plenary should have been followed by more open discussion. There was almost no open plenary discussion all day.
  - We definitely pushed forward understanding of these issues by all parties.
- Delegate comments were more broadly-based, and included:
  - Well timed – good mix of talks and workshops.
  - Afternoon workshop not very productive because case studies were oversimplified.
  - Very good scenario in the afternoon – got people talking.
  - Still useful however to hear how other people (developers and agencies) approach to the template.
  - Small groups for workshops promoted good discussions especially as industry and regulators etc. were in each group.
  - Slightly rushed, but triggered good debate and raised universal questions.

\textsuperscript{3} http://www.snh.gov.uk/policy-and-guidance/sharing-good-practice/presentations/document/?category_code=SGP&topic_id=1464
Delegates were asked some specific questions about their attitudes at the end of the event:

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>As a result of the event, would you be: (Percentage of Yes+No Responses)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>More likely to want to engage in pre-application discussion</td>
<td>100%</td>
<td>0%</td>
</tr>
<tr>
<td>More comfortable about knowing what is required for pre-application discussion</td>
<td>100%</td>
<td>0%</td>
</tr>
<tr>
<td>More likely to use the EIA Screening/Scoping template</td>
<td>74%</td>
<td>26%</td>
</tr>
<tr>
<td>More certain about the type and quality of information or response required for the template</td>
<td>65%</td>
<td>35%</td>
</tr>
</tbody>
</table>

Additional delegate responses in the feedback forms were mirrored in general feedback to sessions during the event, and these are discussed in the following sections.

5 PRE-APPLICATION DISCUSSION SESSION

The subject was very comprehensively introduced by the morning’s speakers, and there was a short opportunity for Q&A with the speakers prior to the workshop team sessions. Workshop teams were pre-selected by the organisers, and each team contained a balanced representation from industry and the different public sector organisations. Teams were facilitated by a member of SNH staff, with another staff member acting as recorder. Teams were urged to select a ‘spokesperson’ to present their findings back to the plenary group.

5.1 PAD Workshop Outputs

The five workshop teams were presented with a list of possible discussion points in relation to PAD (Annex 4), and were also urged to consider any additional points they thought appropriate. They were provided with a pre-printed flip chart, asking them to report back to the plenary group with:

- 3 most positive aspects of the PAD process
- 3 most difficult or challenging aspects of the PAD process

Annex 3 shows the main outputs from the five teams in tabular format.

PAD was generally viewed to be a positive process as far as aquaculture planning is concerned, with key benefits identified as saving time and money, improving communications and the provision of more clarity about the sort of information required by consultees and regulators later in the planning process. On the cautionary side, there was concern about possible lack of commercial confidentiality, some reservations about this actually being a more time-consuming step, and worries about resource implications for public sector organisations and agencies.

5.2 Additional Session Notes

In addition to the ‘formal’ team reports back to plenary group, other points from the PAD workshop sessions were recorded. Where these notes record discussion points that are not included in Annex 3 they are presented below:

- The initial PAD point of contact would be the LPA\(^4\), which would advise on the other bodies to consult with.
- There are differences between new sites and extensions to existing sites – new sites carry more uncertainty, and PAD is therefore more important.

\(^4\) Local Planning Authorities
At what point does industry start discussions? How much detail is required, and how much cost has to be incurred at this point?
- It is useful to get ‘on the ground’ feelings from others.
- Detail should narrow down to specific site issues – research, costs.
- Other regulators’ views have to be taken into account.
- One meeting with all consultees together; but sometimes difficult to achieve, and bilateral meetings might be the way forward.
- A structured approach to some specific issues might be appropriate.
- Cost of developing even an early site idea is an issue: there could be quite a financial investment even before the pre-application stage -
  - Is there any chance of earlier engagement, before too much cost incurred?
- Telephone conversations allow more open dialogue; complex email exchanges are more likely to open FOI prospects.
- Some organisations have several sub-groups or agencies to contact – this make things like minimising emails more difficult.
- But confidentiality is important, especially if strategic plans are being discussed.
- PAD can help developers refine their plans.
- Scenario modelling is important.
- Knowing who to contact can be an issue.

6  EIA TEMPLATE SESSION

The subject was also carefully and comprehensively introduced by the afternoon’s key note speaker, and there was a presentation from SNH on using web-based resources to find environmental and other data about specific locations.

There were four EIA teams for the afternoon session, and they were all presented with a hypothetical map and text based scenario. Teams remained the same as in the morning PAD session. There were two different options for a ‘development’ contained within the scenario: a large new finfish site; or a relatively large expansion to an existing finfish site. Two of the teams tackled the first option, and the other two teams tackled the second option. Annex 5 shows the information the teams received.

6.1  EIA Workshop Outputs

The four workshop teams were asked to discuss the hypothetical project, and report back to the plenary group using pre-printed flip charts containing standard questions. The exercise was intended to offer an opportunity to discuss what issues are relevant to EIA, and how they should be covered using the template format. It was also an opportunity for teams to comment on their views of the templates in general, both from the workshop session and from previous practical experience. Annex 7 presents a summary of the reports back to plenary group in a tabular format.

6.2  EIA Workshop – Plenary Discussion

The team feedbacks outlined in Annex 7, Table 3 were debated by the plenary group, and some key issues were identified:

- The templates as they currently exist are ‘cumbersome’ to use as a tool to be exchanged by email or on CD-ROM. It was recognized that they would be easier to use if they were web-based, and it was acknowledged by Scottish Government that this had been the long term goal from the inception of the template project. However, there had to be a period to determine whether the templates were the best approach before there was any...
move towards consideration of them being web-based. Issues that would need to be considered include who would be the ‘owner’ and ‘host’ for such an on-line approach, bearing in mind that these are tools used by different LPAs (as well as industry and consultees).

- It is not clear that the core purpose of the EIA templates is widely appreciated, or perhaps achievable with the current template structure and guidance: to encourage a focus on ‘likely significant’ environmental effects, and if a positive screening judgement is made, to reflect that focus by way of a shorter rather than longer list of issues recommended for consideration in the scoping advice. Much of the plenary discussion revolved around an apparent dissatisfaction with ‘having to put too much detail into the screening template’
- From the public sector organisations, there was a feeling of ‘too much detail’ actually being irrelevant detail – and therefore inefficient
- It was, however, suggested that pre-application discussion was the phase at which the necessary information (type and quality) could be identified, thereby streamlining the EIA screening/scoping stage once that was reached
- It did seem that there was a lack of confidence from industry that if they did reduce the information contained within the templates, they would then have to add to it later and delay the process.

7 SHELLFISH PLANNING APPLICATION SESSION - Outcomes

It was possible to hold a ‘shellfish’ team session in the afternoon, in place of one of the 5 EIA teams that had been originally planned. A slightly different scenario was created for this team – Annex 8. The rationale for the session was that whilst shellfish farming does not fall under the EIA regulations, many of the impact/receptor issues still exist and have to be assessed by the planning process. In this regard, there is a degree of parallel between information that a developer might put into a finfish EIA screening template, and the information a shellfish farmer might consider for inclusion in Part B of a planning application form.

The shellfish team was asked to report back to plenary group with answers to pre-set questions:

**Question 1**: What are the three most likely interactions between the proposed new shellfish farm and the environment in the loch?

**Answers**:
1. Scale – there may be questions about the carrying capacity in the loch, and cumulative impact
2. Landscape – the proposed new farm is within an NSA
3. Seabed impacts – it is not clear what species/habitats might exist in the area to be covered by the proposed farm
4. The SPA for sea eagles – is there any chance of disruption to the SPA because of the shellfish farming activity (boat traffic, etc)

**Question 2**: What changes to the proposal (including alternative locations) would improve the project overall, and possibly improve its chances of obtaining planning permission?

**Answers**:
1. Reduce the scale of the proposal on the new site
2. If possible, consolidate and make productive use of the existing leases

Sharing knowledge, skills and experience
The final and perhaps main recommendation the team made was that more pre-application discussion was certainly warranted if there was a desire to expand shellfish production in this loch.

8 SUMMARY, DISCUSSION AND RECOMMENDATIONS

8.1 Summary and Discussion

8.1.1 The SGP Event

The smaller workshops were clearly essential to allow all stakeholders to participate and have their voice heard. The larger plenary group sessions became more productive later in the event, after individuals had become accustomed to speaking out – however, they were less successful earlier in the day. This is not an unexpected phenomenon, and the day was deliberately planned to minimise any disruption to ‘flow’ relating to early reticence on the part of plenary group members.

The event was ambitious and could not cover everything in the detail that was obviously necessary. The morning PAD discussion sessions worked well, and there was good output. The afternoon EIA discussions also worked well, and caused teams to focus on a whole range of EIA-relevant issues. However, and perhaps unsurprisingly, it was more difficult to keep the focus on the use of the template, rather than the general issues relating to EIA for this sector.

On balance:
- The workshop achieved its objectives in so far as ‘what is best practice’ was very vigorously debated by very experienced delegates.
- It was also an excellent networking opportunity between industry and public sector bodies – building relationships.
- It allowed people a chance to discuss how different groups think about possible aquaculture issues, e.g. why is a SAC for pearl mussels potentially important?
- It gave people some practice in discussing where they would go to find information, and also gave them some ideas about what sort of information would be needed in specific cases.
- It was a real affirmation of just how important PAD is – but also highlighted the challenges that still have to be faced if PAD is going to be used consistently and well.

8.1.2 PAD

PAD was clearly identified as worthwhile as a broad principle, but there were some important questions or caveats.

One PAD issue that came through strongly was at what stage the developer should initiate the PAD process. The different organisational perspectives might be:

- A developer might have identified a relatively broad ‘area’ of coast that is of interest, and might like to sound out regulators about this at an early stage.
- Because by the time the developer has decided on what it thinks is the ‘best’ actual site, quite a lot of money might have been spent on surveys and drawings – which would be wasted, if at PAD, every other party indicates concerns about that specific site.
- Similarly, some statutory consultees might also like to be involved at an early conceptual stage, so that they can assist in steering the developer towards specific locations that suit their regulatory obligations.
• On the other hand, PAD has resource implications, and LPAs would ordinarily like to see a material outcome for the effort expended. It is difficult to see how that can be achieved, if a specific potential planning application scenario is not brought to the table at PAD.

A related issue was some uncertainty as to how much information a developer should bring to a PAD initiative in the first place. This overlaps with the positive suggestion from the EIA session, that PAD is the place to deal with a lot of the initial screening issues – i.e., as much information as possible, so that it can be considered and quickly discounted, or flagged up for further attention during formal screening.

Confidentiality is a concern for industry, and whilst LPAs and organisations such as SEPA are well-acccustomed to maintaining confidentiality with developers, there seems to be concerns that other public sector bodies are less confident in this regard. They are all working within the same legislative framework, and it should be possible to develop a common protocol for all parties involved in PAD – one that reassures industry that they can share plans and thoughts at an earlier rather than later stage.

Comments were made about the perception of ‘red tape’ on the part of industry, and on the fact that PAD was another, and possibly time-consuming, step in the overall process. It is likely that these concerns reflect lack of familiarity with the process. When the plenary group was collectively asked how many of its industry members had actually been involved in some sort of PAD activity, there was a very positive response. Some delegates thought that it was a potentially daunting hurdle for new entrants to the industry – although it could be argued that it’s an essential learning-curve tool for new entrants, such that by the time they actually enter the industry, they are much better informed about its regulatory structure. PAD can also help to avoid wasted time if an application has no prospect of being approved.

Lack of participation/feedback by some consultee organisations was raised as a concern, and would be a valid one if it were public sector bodies that were not participating in a process that is widely seen as best practice. However, this also led to some discussion about which consultee organisations should be involved in PAD. Consulting non-statutory bodies (or statutory bodies relying on non-statutory bodies for technical advice) opens up more prospects for lack of timely and measured feedback, and also potentially introduces further risks with respect to confidentiality in the process.

PAD would be a negative approach if consultees said one thing during the process, and then something completely different during the formal planning consultation process. This was raised as a concern, but it is unclear whether there is evidence for this actually happening. It is worth noting here that PAD is used as a matter of routine by companies in other sectors, where the benefits are recognised.

There was some concern that there was a lack of aquaculture industry expertise within some of the LPAs. This is increasingly unlikely to be true, because of the ISLAD\(^5\) and related workstreams, but in any event it should perhaps not be seen as a reason for not promoting PAD as best practice.

Teams were asked to consider whether PAD stakeholders could be consulted in ‘group meetings’, or whether they should be contacted separately. Delegates seemed to be generally in favour of the latter approach, and cited the difficulty of organising group meetings (in diary terms) as being one reason.

---

\(^5\) Improving Systems for Licensing and Development working group

Sharing knowledge, skills and experience
8.1.3 EIA Template Issues

It is important to reiterate that there is a parallel research project, commissioned by Scottish Government, looking at both objective and subjective indicators relating the use of the EIA templates since they were launched. That research is not yet complete at the time of compiling this SGP event report. It should be noted that the information from this event will feed into the conclusions on the overall evaluation of the templates.

SGP event delegates raised a number of issues:

- The cumbersome nature of the handling of the screening/scoping template – largely because it is not web-based, as might have been the original intention when it was created.
- A concern about too much ‘generic’ information being inserted by developers, and not enough site-specific information.
- Concerns from developers about the fact that the screening/scoping template appears to demand a lot of (too much?) information to be inserted at the start.
- Despite which, developers are concerned that they will still be asked for additional information at a later stage.

It was clear from both team workshops and from the plenary group discussion, that the main bottlenecks in this whole area relate to concerns over the amount of information and level of detail required, rather than the screening/scoping template – with the exception of specific comments about its cumbersome handling attributes. As the keynote speaker in the afternoon pointed out, the templates are just tools, and the process of EIA is the key issue.

Industry comments appear to reflect a lack of recollection of what transpired before, and why the templates were introduced in the first place: almost 50% of developments requiring full ESs, which were scoped for many probably unlikely to be significant issues, and which took months and tens of thousands of pounds to produce. The templates were introduced to reduce the amount of information supplied by focusing on the key issues. Everyone signed up for the development of the EIA templates at the start, and it is somewhat surprising to see such negativity about their practical use.

There seemed to be a lack of a clear understanding about the legal obligations of EIA. When presented with a request for a screening opinion, a statutory consultee can only give clear advice if they have sufficient information to determine whether a possible impact/receptor issue is likely to cause a significant environmental effect. Statutory consultees do not have all the site-specific information to hand, and the EIA timescale does not allow them to undertake costly primary research into every site-specific aspect. If they have any doubt, then they are legally obliged to ask for further information – and in EIA terms, this means that they make must make a positive screening recommendation, and ask for the further information to be provided in an ES. The whole point of the screening/scoping template is that industry should research and present all the necessary and relevant information at the screening stage, so that statutory consultees can feel confident they have sufficient information to be able to: offer clear advice on significant impacts; and (just as importantly) dismiss potential impacts as not significant. The “Working Arrangements” put in place by statutory consultees and the ISLAD project on guidance on the minimum information required to be submitted with screening and scoping templates should help to address this.

In some cases, there may be concerns that cannot be resolved at the screening phase, despite all best efforts. In that case, the template is designed to channel the scoping advice into the one or two or three issues that will require to be covered by way of an ES.
8.2 Recommendations

Based upon the evaluation of this workshop, it is recommended that:

8.2.1 PAD

1. PAD is best practice, and developers should consider using it for every intended aquaculture development.
2. The optimum project-planning stage at which a developer should consider commencing PAD should remain flexible, but an early telephone conversation with the LPA should be undertaken, in order to seek advice as to how and when to proceed.
3. Developers and statutory organisations should consider PAD as an early opportunity to advise on information that would be required at EIA screening.
4. Commercial confidentiality is potentially important during the PAD process, and statutory consultee organisations should take internal and external advice on how this can be assured – perhaps seeking advice from LPAs and SEPA.
5. Developers, perhaps with guidance from LPAs, should have the option to consult with statutory bodies collectively or individually.
6. Advice and guidance offered during PAD should:
   a. Be followed as much as possible by developers, so that there are no surprises when formal EIA screening and planning application comes forward. If changes to plans do occur then engagement in further PAD would be warranted.
   b. Be as informative as possible by statutory consultees (although that can only be based on the information available at the time), in order to avoid additional and unexpected information burdens at formal EIA screening and planning application.
7. The choice of PAD consultee organisations to approach should rest with the developer, with the proviso that:
   a. All statutory consultee organisations should be contacted (in addition to LPAs): Scottish Government; MSS; SEPA; SNH
   b. DSFBs are also statutory consultees, but should be able to reassure on commercial confidentiality during PAD before being approached.
8. Developers should be responsible for ensuring they have the correct consultee contact names and details for their area, but statutory consultees should assist developers in this regards, when asked to do so.
9. The SSPO PAD Guidance, to be published in due course, should serve as best practice for all concerned, particularly when it provides advice that is over-and-above that contained in this SGP report.

8.2.2 EIA Screening/Scoping Template

1. Use of the template is best practice, for both new applications and modifications. This has been reinforced in Delivering Planning Reform for Aquaculture.
2. Developers and statutory consultees should use the PAD process to ensure that the template:
   a. Contains all relevant and necessary information.
   b. Does not contain unnecessary and bulky information.
3. Web-hosting and online accessibility of the screening/scoping and ES templates should be considered – by Scottish Government in the first instance.
4. In parallel, whether the templates will be placed online or not, the templates should be revised so that they become more useable.
5. Better information and guidance should be available to industry, LPAs and statutory consultees as to issues that might give rise to objective concerns about likely significant
environmental effects, and it is anticipated that the activities of Scottish Government and the ISLAD group will assist in this regard. Issues could include:

a. Information requirements – detail and amount for each issue.
b. Justification for requests in terms of the EIA regulations and other legislation?
ANNEXES
## ANNEX 1  WORKSHOP DELEGATES

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alex Adrian</td>
<td>The Crown Estate</td>
</tr>
<tr>
<td>Stephen Bell</td>
<td>Scottish Salmon Producers Organisation</td>
</tr>
<tr>
<td>Juan Brown</td>
<td>SNH</td>
</tr>
<tr>
<td>Marc Browne</td>
<td>Lakeland Group</td>
</tr>
<tr>
<td>Robin Campbell</td>
<td>Historic Scotland</td>
</tr>
<tr>
<td>Paul Condy</td>
<td>The Scottish Salmon Company</td>
</tr>
<tr>
<td>Dominic Counsell</td>
<td>SNH</td>
</tr>
<tr>
<td>Jack Dale</td>
<td>Seacliff SA</td>
</tr>
<tr>
<td>Janet Davies</td>
<td>SEPA</td>
</tr>
<tr>
<td>Annette Woodham</td>
<td>Xodus Group</td>
</tr>
<tr>
<td>Anna Turnbull</td>
<td>Marine Scotland</td>
</tr>
<tr>
<td>Alisdair MacDonald</td>
<td>Marine Scotland</td>
</tr>
<tr>
<td>Mary Gibson</td>
<td>SNH</td>
</tr>
<tr>
<td>Ewan Gillespie</td>
<td>SEPA</td>
</tr>
<tr>
<td>Matt Gubbins</td>
<td>MSS</td>
</tr>
<tr>
<td>Suz Henderson</td>
<td>SNH</td>
</tr>
<tr>
<td>Moira Hogg</td>
<td>SNH</td>
</tr>
<tr>
<td>Dougie Hunter</td>
<td>Marine Harvest Scotland</td>
</tr>
<tr>
<td>Rachael Iveson</td>
<td>RPS Planning and Development</td>
</tr>
<tr>
<td>Robert Kelly</td>
<td>Isle of Skye Mussel Co Ltd</td>
</tr>
<tr>
<td>Richard Kerr</td>
<td>Argyll &amp; Bute Council</td>
</tr>
<tr>
<td>Scott Landsburgh</td>
<td>SSPO</td>
</tr>
<tr>
<td>Matthew Laughton</td>
<td>The Scottish Salmon Company</td>
</tr>
<tr>
<td>Rhona Lindsay</td>
<td>SNH</td>
</tr>
<tr>
<td>Claire Lumley-Holmes</td>
<td>Marine Harvest Scotland</td>
</tr>
<tr>
<td>Alisdair MacDonald</td>
<td>Marine Scotland</td>
</tr>
<tr>
<td>Roddy MacMinn</td>
<td>SNH</td>
</tr>
<tr>
<td>Owen McGrath</td>
<td>SNH</td>
</tr>
<tr>
<td>Alicia McLean</td>
<td>Loch Duart Ltd</td>
</tr>
<tr>
<td>Craig McIntyre</td>
<td>Argyll Fisheries Trust</td>
</tr>
<tr>
<td>Jane McMinn</td>
<td>Firth of Forth Lobster Hatchery</td>
</tr>
<tr>
<td>John O'Brien</td>
<td>Scottish Government</td>
</tr>
<tr>
<td>Fiona Rice</td>
<td>SNH</td>
</tr>
<tr>
<td>Hugh Richards</td>
<td>Wester Ross Fisheries Ltd</td>
</tr>
<tr>
<td>Richard Slaski</td>
<td>Epsilon Resource Management</td>
</tr>
<tr>
<td>Mark Steward</td>
<td>Argyll &amp; Bute Council</td>
</tr>
<tr>
<td>Shona Tumbull</td>
<td>Highland Council</td>
</tr>
<tr>
<td>Anna Tumbull</td>
<td>Marine Scotland</td>
</tr>
<tr>
<td>Katy A Urquhart</td>
<td>Marine Scotland</td>
</tr>
<tr>
<td>Sheena Warnock</td>
<td>Scottish Sea Farms</td>
</tr>
<tr>
<td>Chris Webb</td>
<td>Northern Isles Salmon Ltd</td>
</tr>
<tr>
<td>Christine Welsh</td>
<td>SNH</td>
</tr>
<tr>
<td>Colin Wishart</td>
<td>Highland Council</td>
</tr>
<tr>
<td>Annette Woodham</td>
<td>Xodus Group</td>
</tr>
<tr>
<td>Liam Wright</td>
<td>SNH</td>
</tr>
</tbody>
</table>
## ANNEX 2  FEEDBACK FORM ANALYSIS

Event Aquaculture processes for streamlined planning  
Date: 25 November 2010

<table>
<thead>
<tr>
<th>How well did the event meet your expectations?</th>
<th>Presentations</th>
<th>Workshops</th>
<th>Discussion</th>
<th>Administration</th>
<th>How satisfied were you with the.....?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>3</td>
<td>4</td>
<td>3</td>
<td>3</td>
<td>SGP Programme</td>
</tr>
<tr>
<td>2</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>3</td>
<td>SGP Programme</td>
</tr>
<tr>
<td>3</td>
<td>3</td>
<td>4</td>
<td>3</td>
<td>2</td>
<td>Email Bulletin</td>
</tr>
<tr>
<td>4</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>SGP Programme</td>
</tr>
<tr>
<td>5</td>
<td>3</td>
<td>4</td>
<td>3</td>
<td>4</td>
<td>Word of Mouth</td>
</tr>
<tr>
<td>6</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>Word of Mouth</td>
</tr>
<tr>
<td>7</td>
<td>2</td>
<td>4</td>
<td>3</td>
<td>3</td>
<td>Email Bulletin</td>
</tr>
<tr>
<td>8</td>
<td>3</td>
<td>4</td>
<td>4</td>
<td>3</td>
<td>Word of Mouth</td>
</tr>
<tr>
<td>9</td>
<td>3</td>
<td>3</td>
<td>2</td>
<td>3</td>
<td>Word of Mouth</td>
</tr>
<tr>
<td>10</td>
<td>3</td>
<td>4</td>
<td>4</td>
<td>3</td>
<td>Email Bulletin</td>
</tr>
<tr>
<td>11</td>
<td>2</td>
<td>4</td>
<td>4</td>
<td>3</td>
<td>Email Bulletin</td>
</tr>
<tr>
<td>12</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>SGP Programme</td>
</tr>
<tr>
<td>13</td>
<td>3</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>Other - Manager</td>
</tr>
<tr>
<td>14</td>
<td>5</td>
<td>4</td>
<td>3</td>
<td>4</td>
<td>Word of Mouth</td>
</tr>
<tr>
<td>15</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>Email Bulletin</td>
</tr>
<tr>
<td>16</td>
<td>3</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>Word of Mouth</td>
</tr>
<tr>
<td>17</td>
<td>4</td>
<td>4</td>
<td>5</td>
<td>5</td>
<td>Other - SSPO notified</td>
</tr>
<tr>
<td>18</td>
<td>3</td>
<td>5</td>
<td>5</td>
<td>5</td>
<td>SGP Programme</td>
</tr>
<tr>
<td>19</td>
<td>3</td>
<td>4</td>
<td>5</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>20</td>
<td>3</td>
<td>3</td>
<td>4</td>
<td>4</td>
<td>Email Bulletin</td>
</tr>
<tr>
<td>21</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>SNH Website</td>
</tr>
<tr>
<td>22</td>
<td>4</td>
<td>4</td>
<td>3</td>
<td>3</td>
<td>Word of Mouth</td>
</tr>
<tr>
<td>23</td>
<td>3</td>
<td>4</td>
<td>4</td>
<td>3</td>
<td>Email Bulletin</td>
</tr>
<tr>
<td>24</td>
<td>3</td>
<td>3</td>
<td>5</td>
<td>5</td>
<td>Email Bulletin</td>
</tr>
<tr>
<td>25</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>Word of Mouth</td>
</tr>
<tr>
<td>26</td>
<td>3</td>
<td>4</td>
<td>3</td>
<td>3</td>
<td>Email Bulletin</td>
</tr>
<tr>
<td>27</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>3</td>
<td>Word of Mouth</td>
</tr>
<tr>
<td>28</td>
<td>3</td>
<td>4</td>
<td>4</td>
<td>3</td>
<td>Email Bulletin</td>
</tr>
<tr>
<td>29</td>
<td>3</td>
<td>4</td>
<td>3</td>
<td>3</td>
<td>Email Bulletin</td>
</tr>
</tbody>
</table>

### Summary

<table>
<thead>
<tr>
<th>How well did the event meet your expectations?</th>
<th>Presentations</th>
<th>Workshops</th>
<th>Discussion</th>
<th>Administration</th>
<th>Overall</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.29</td>
<td>3.89</td>
<td>3.75</td>
<td>3.50</td>
<td>4.00</td>
<td>3.69</td>
</tr>
</tbody>
</table>

| How did you hear about this event?            |                |            |            |                |         |
|-----------------------------------------------|                |            |            |                |         |
| SNH website                                   | 1              |            |            |                |         |
| SGP programme                                 | 5              |            |            |                |         |
| Email bulletin                                | 11             |            |            |                |         |
| Word of mouth                                 | 9              |            |            |                |         |
| Other                                         | 2              |            |            |                |         |

Sharing knowledge, skills and experience
### Table 1 PRE-APPLICATION DISCUSSION SESSION

<table>
<thead>
<tr>
<th>Team</th>
<th>Yellow</th>
</tr>
</thead>
<tbody>
<tr>
<td>3 Positives</td>
<td>1 Chance to fine-tune final application</td>
</tr>
<tr>
<td></td>
<td>2 Saves money: a) Not proceed with 'doomed' application; b) Not gather data that is not needed</td>
</tr>
<tr>
<td></td>
<td>3 Speeds up and smooths the process</td>
</tr>
<tr>
<td>3 Challenges</td>
<td>1 Can be daunting. Might put off new entrants to the industry. Early perception of 'red tape'</td>
</tr>
<tr>
<td></td>
<td>2 Commercial confidentiality</td>
</tr>
<tr>
<td></td>
<td>3 Time consuming: might increase overall time taken</td>
</tr>
<tr>
<td></td>
<td>4 Lack of knowledge and expertise in some Local Authorities</td>
</tr>
<tr>
<td>Team</td>
<td>Orange</td>
</tr>
<tr>
<td>3 Positives</td>
<td>1 Relationship development: stakeholders like to feel they have been consulted/considered</td>
</tr>
<tr>
<td></td>
<td>2 Clarity about requirements for the application - makes the regulators’ job easier</td>
</tr>
<tr>
<td></td>
<td>3 Greater chance of a successful conclusion to the final application</td>
</tr>
<tr>
<td></td>
<td>4 Ensures that all relevant issues are considered during the application process</td>
</tr>
<tr>
<td></td>
<td>5 Saves money</td>
</tr>
<tr>
<td>3 Challenges</td>
<td>1 A risk might be poor feedback from groups consulted</td>
</tr>
<tr>
<td></td>
<td>2 In a round table, there might be variation between stakeholder views</td>
</tr>
<tr>
<td></td>
<td>3 Confidentiality - news of the proposed project might get out before the permission is secured</td>
</tr>
<tr>
<td></td>
<td>4 Make sure that all relevant interests are considered: Question on whether that should be just regulators, or other groups as well</td>
</tr>
<tr>
<td>Team</td>
<td>Green</td>
</tr>
<tr>
<td>3 Positives</td>
<td>1 It opens lines of communications</td>
</tr>
<tr>
<td></td>
<td>2 Identifies show stoppers as soon as possible: avoids abortive development costs; increases quality of final application</td>
</tr>
<tr>
<td></td>
<td>3 Saves time and improves confidence</td>
</tr>
<tr>
<td>3 Challenges</td>
<td>1 The logistics of organising group PAD meetings is difficult, and there are no guarantees of success</td>
</tr>
<tr>
<td></td>
<td>2 PAD outcomes may prove to be inconsistent with the final advice/responses that emerge during the formal planning stage</td>
</tr>
<tr>
<td></td>
<td>3 PAD increases confidence</td>
</tr>
<tr>
<td>Team</td>
<td>Blue</td>
</tr>
<tr>
<td>3 Positives</td>
<td>1 Improves communication</td>
</tr>
<tr>
<td></td>
<td>2 Increases certainty; reduces surprises</td>
</tr>
<tr>
<td></td>
<td>3 Saves time and money in the long run</td>
</tr>
<tr>
<td>3 Challenges</td>
<td>1 Developers may already be committed to a project</td>
</tr>
<tr>
<td></td>
<td>2 Uncertain as to how much information to bring forward, and when</td>
</tr>
<tr>
<td></td>
<td>3 It has resource implications for Local Authorities and public agencies</td>
</tr>
<tr>
<td>Team</td>
<td>Red</td>
</tr>
<tr>
<td>3 Positives</td>
<td>1 Saves time</td>
</tr>
<tr>
<td></td>
<td>2 Improves communications, especially local contacts</td>
</tr>
<tr>
<td></td>
<td>3 Information is shared</td>
</tr>
<tr>
<td>3 Challenges</td>
<td>1 Confidentiality</td>
</tr>
<tr>
<td></td>
<td>2 Takes time (if not done well)</td>
</tr>
<tr>
<td></td>
<td>3 Has resource implications</td>
</tr>
</tbody>
</table>
There were common themes across the teams, as illustrated in Table 2.

**Table 2 PAD WS Summaries**

<table>
<thead>
<tr>
<th>POSITIVES</th>
<th>Percent</th>
<th>CHALLENGES</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fine Tune Application</td>
<td>6%</td>
<td>Red tape; daunting to new entrants</td>
<td>7%</td>
</tr>
<tr>
<td>Saves Money</td>
<td>17%</td>
<td>Commercially confidential</td>
<td>20%</td>
</tr>
<tr>
<td>Saves Time</td>
<td>22%</td>
<td>Time consuming</td>
<td>13%</td>
</tr>
<tr>
<td>Better Communications</td>
<td>22%</td>
<td>Poor consultee feedback</td>
<td>7%</td>
</tr>
<tr>
<td>Clarity About Information</td>
<td>17%</td>
<td>Different stakeholder views</td>
<td>7%</td>
</tr>
<tr>
<td>Greater Success</td>
<td>6%</td>
<td>Which groups to consult</td>
<td>7%</td>
</tr>
<tr>
<td>Identify Show Stoppers</td>
<td>6%</td>
<td>Logistics difficult - group meetings</td>
<td>7%</td>
</tr>
<tr>
<td>Greater Certainty</td>
<td>6%</td>
<td>Inconsistent advice from consultees</td>
<td>7%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Developers already committed</td>
<td>7%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>What information to bring, and when</td>
<td>7%</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Resource issues - public sector, PAD has to achieve concrete outcomes to be worthwhile</td>
<td>13%</td>
</tr>
</tbody>
</table>

---

6 Percentage occurrence of responses relating to these issues, taking into account all responses, and allowing for rounding.
Annex 4  PLANNING GROUP MEMBERS

The **Sharing Good Practice Event** Planning Group members were:

<table>
<thead>
<tr>
<th>Name</th>
<th>Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suz Henderson</td>
<td>SNH</td>
</tr>
<tr>
<td>Dominic Counsell</td>
<td>SNH</td>
</tr>
<tr>
<td>John O’Brien</td>
<td>Scottish Government</td>
</tr>
<tr>
<td>Stephen Bell</td>
<td>SSPO</td>
</tr>
<tr>
<td>Richard Slaski</td>
<td>ERM</td>
</tr>
<tr>
<td><em>(Latterly)</em> Rhona Lindsay</td>
<td>SNH (SGP team)</td>
</tr>
</tbody>
</table>
## PRE-APPLICATION DISCUSSION: TOPICS

1. Should finfish farm companies always engage in pre-application discussion (PAD)?
2. Who should developers approach for PAD: do they have contact names/details?
3. How should they approach PAD – bilateral meetings, or ‘round the table’ meetings: pros and cons?
4. Are there any commercial sensitivities?
5. If so, how do LPAs, SEPA, SNH etc deal with those sensitivities in the wider non-aquaculture sphere?
6. What sort of information should the company bring to PADs?
7. Is one meeting enough – or will some organisations have to go away and think about their advice?
8. How much negotiation is possible within PAD, from everyone’s perspective – e.g. commercial/technical practicality of undertaking some sorts of survey work?
9. If PAD goes well, do developers consider that they would be able to fine-tune plans – or is a fish farm a fish farm, with very little scope for nipping and tucking?
10. If PAD goes well, do developers consider that they then need to proceed to formal written PAC before submitting the planning application? Does it depend on scale/location?

- *Any other topics?*
Sharing knowledge, skills and experience
Not forgetting (issues not shown on the maps):

- **Locational Guidelines:** the Loch is currently Category 3

- **Possible interactions also covered by other regulatory regimes:** benthic; water column; navigation safety; fish health; etc
  - What does the EIA process require, if these other regimes have not yet been applied to the proposed development at the time a screening opinion is requested?

- Possible receptors we **don't** know about, e.g. designated species or habitats within the area of possible impacts from the development
  - Think about SEPA/SNH protocol for seabed surveys

- **What is the planning policy context in each area for aquaculture** — what has been written and published?
  - Remember the debate on the 30th: map-based or context-based decision making
## ANNEX 7  EIA TEMPLATE WORKSHOP OUTPUTS

### Table 3 EIA Template Session Outcomes

<table>
<thead>
<tr>
<th>TEAM</th>
<th>Green</th>
<th>Red</th>
<th>Blue</th>
<th>Orange</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exercise</td>
<td>New Site</td>
<td>New Site</td>
<td>Expansion</td>
<td>Expansion</td>
</tr>
<tr>
<td>Screening +ve or -ve</td>
<td>+ve</td>
<td>+ve</td>
<td>-ve</td>
<td>+ve</td>
</tr>
</tbody>
</table>

### Key Issues:

<table>
<thead>
<tr>
<th></th>
<th>Visual - need L VIA</th>
<th>Visual - need L VIA</th>
<th>SAC - pearl mussels</th>
</tr>
</thead>
<tbody>
<tr>
<td>Benthic - need modelling</td>
<td>Benthic - need modelling</td>
<td>SPA - sea eagles</td>
<td></td>
</tr>
<tr>
<td>SAC - pearl mussels</td>
<td>SAC - pearl mussels</td>
<td>Salmonids</td>
<td></td>
</tr>
<tr>
<td>Other protected spp?</td>
<td>Benthic interests to be identified</td>
<td>Visual issues</td>
<td></td>
</tr>
<tr>
<td>Cumulative impact</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### EIA Template Challenges:

#### Developers

<table>
<thead>
<tr>
<th>1</th>
<th>Checklist process encourages over-precaution</th>
<th>To standardised.</th>
<th>Uncertain of level of detail required</th>
<th>Repetitive, and large level of detail required</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Request for additional information once EIA finished</td>
<td>Too much information needed</td>
<td>What do you need to give to statutory consultees, and why</td>
<td>Overlap with CAR?</td>
</tr>
<tr>
<td>3</td>
<td></td>
<td>Fosters 'them and us'</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td>Gets bigger and bigger</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### Local Authorities

<table>
<thead>
<tr>
<th>1</th>
<th>Electronic transfer of information</th>
<th>Too much information provided</th>
<th>Not enough site-specific information - too generic</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Ref. observations in Colin Wishart presentation</td>
<td>Less, what balance?</td>
<td>How to justify non-significance (need to do this in planning reports)</td>
</tr>
</tbody>
</table>

#### Statutory Consultees

<table>
<thead>
<tr>
<th>1</th>
<th>Should consider making it more interactive</th>
<th>Pre-application discussion should really be the point of 'screening and scoping'</th>
<th>Need focused information</th>
<th>Not enough site-specific information - too generic</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td></td>
<td></td>
<td>Concern of quality and clarity of information supplied</td>
<td></td>
</tr>
</tbody>
</table>
ANNEX 8  SHELLFISH SCENARIO MATERIAL

You will consider what you might want to include as additional (supplementary) information in Part B of your planning application form.

Consider what is known about the icon and surrounding area/meet page), taking into account what is already shown on this diagram, and decide how the Part B might be completed.

SALMON FARMS
Not stocked
Currently stocked

SHELLFISH (MUSSEL) FARMS
Not stocked
Currently stocked

Proposed new: 1000 tonnes of mussels p.a.

Sharing knowledge, skills and experience
Not forgetting (issues not shown on the map):

- Possible interactions also covered by other regulatory regimes: benthic; water column; navigation safety; fish or shellfish health; etc — where appropriate

- Possible receptors we don’t know about, e.g. designated species or habitats within the area of possible impacts from the development
  - E.g. the farmed mussels might be dropping off detritus and putting faeces/pseudo-faeces on the seabed — exactly where there are or might be sensitive species such as Modiolus (horse mussels) or sea pens

- What is the planning policy context in each area for aquaculture — what has been written and published?
  - Is being beside an AGLV significant?
  - What is the policy on new shellfish production