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## **Report**

Aquaculture Community Engagement Scoping Study

Phase 1: Stakeholder Consultation

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## Glossary

ASSG	Association of Scottish Shellfish Growers
CC	Community Council
IEL	Imani Enterprise Ltd
IMTA	Integrated Multi-Trophic Aquaculture
LA	Local Authority
MGSA	Ministerial Group for Sustainable Aquaculture
SRSL	SAMS Research Services Ltd
SAMS	Scottish Association for Marine Science
SSPO	Scottish Salmon Producers' Organisation
SSMG	Scottish Shellfish Marketing Group
SLA	Sustainable Livelihoods Approach

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## 1. INTRODUCTION

The following study was designed to build on outcomes of the Marine Scotland report ‘An assessment of the benefits to Scotland of aquaculture and growth in aquaculture<sup>1</sup>’ (henceforth referred to as ‘The Marine Scotland Report’). Aside from the economic benefits of aquaculture to Scotland, a key finding of the report presented to the Ministerial Group for Sustainable Aquaculture, was the importance for human and social capital in terms of employment and associated skills development, particularly for rural communities. A final outcome presented was that communities should be considered to be ‘core business’ for aquaculture development. In this way there is a benefit to the companies in having communities engaged from the start and hopefully mitigating issues at a later time, while communities can see more tangible benefit from the industry that is operating in the areas where they live.

The aim of this study was to look further into the options for standardising how aquaculture operations engage with and empower communities to enhance social benefits and community cohesion with a focus on farms placing greater emphasis on stewardship of resources. Before taking steps to implement any standards or guidelines, it was agreed that a wider scoping process was required to review how the aquaculture industry currently engages with communities and how stakeholders felt this could be improved going forward. The aim of the process was to assess what is already done and how existing activities can be built on, rather than starting from scratch or adding to the existing workload around applications and operation of farms.

During the Marine Scotland study, there were a number of comments from communities and industry which highlighted the community engagement approach taken within the renewable energy sector and discussion as to how this could apply to aquaculture. Although very different industries, they are both now a key part of development particularly on the West coast of Scotland, Lewis and Shetland, so there is some interesting overlap to be considered and lessons that could be learned – these will also be discussed.

### 1.1. WHAT IS COMMUNITY BENEFIT / ENGAGEMENT?

The first issue to be considered is the definition of a community and how opinions can vary. The Oxford English Dictionary defines community as “*A group of people living in the same place or having a particular characteristic in common*”<sup>2</sup>. In an aquaculture planning context, community is generally considered to be those who are living within the development area and in Scotland this is often within local Community Council wards. The important factor however, is how people feel impacted by a development, so while one community can be living in close proximity and impacted by the development in terms of traffic, a more distant community may be impacted visually. For this reason it is important that consideration is given to the engagement process to help identify who the community will be and how they should best be approached throughout a development process.

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<sup>1</sup> <http://www.scotland.gov.uk/Topics/marine/Publications/publicationslatest/farmedfish/AqBenefits>

<sup>2</sup> <http://www.oxforddictionaries.com/definition/english/community>



### 1.1.1. COMMUNITY ENGAGEMENT

The process of community engagement is well documented and can be defined as follows:

*“Community engagement refers to the process by which industries and communities build ongoing, permanent relationships for the purpose of applying a collective vision for the benefit of a community.”<sup>3</sup>*

In relation to the aquaculture sector this definition is highly relevant and this provides the context by which engagement will be discussed throughout the following report.

### 1.1.2. COMMUNITY BENEFIT

Contrary to the relatively straight-forward definition of community engagement above, community benefit is far more complicated to define. Community benefit means different things to different people and can range from direct financial reward or one business lending the use of equipment to another through to downstream indirect benefits such as the continuation of a ferry operation as a result of aquaculture industry use. As a result, community benefit can also be seen as one component of the wider community engagement process.

The wider benefits of the aquaculture industry were discussed in detail in the Marine Scotland Report, as mentioned above. These benefits extend both upstream and downstream of the production operations and cover a much wider geographical area than the location of a farm itself. Figure 1 outlines the Sustainable Livelihoods Approach which was used for the Marine Scotland Report and highlights the complexity of defining community benefits as there are many elements to consider, which are highly subjective depending on individual perspectives. For the purposes of this report, the aim was to examine accountability with regard to the communities where farms are located and in close proximity, rather than the wider economic benefits.

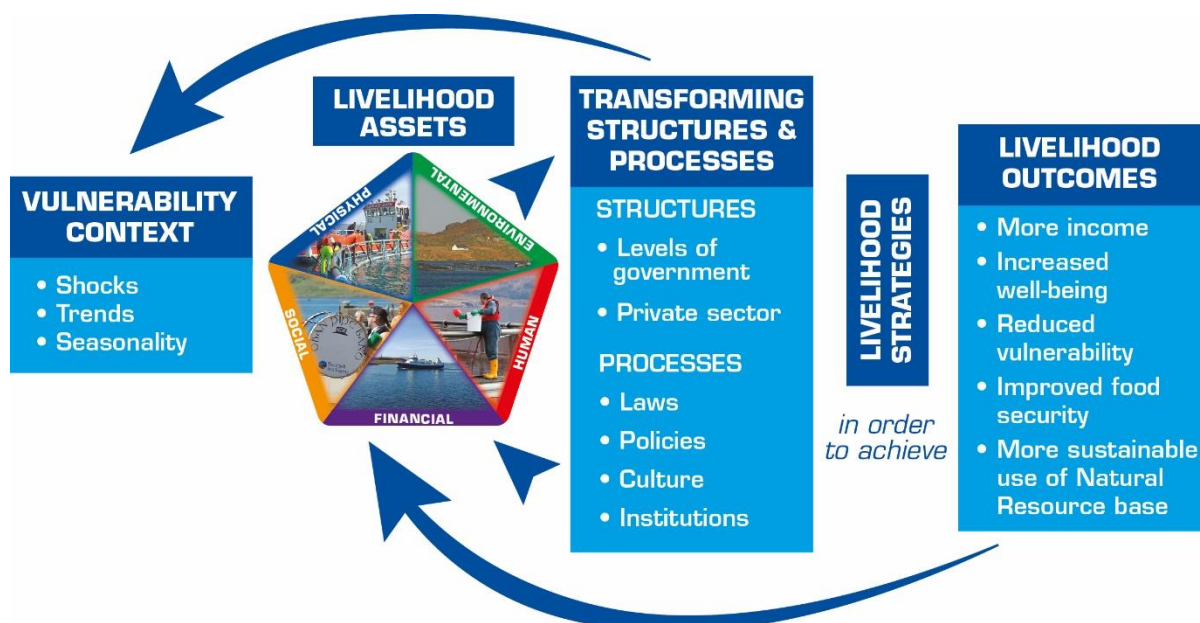


FIGURE 1. SUSTAINABLE LIVELIHOODS ASSESSMENT FRAMEWORK<sup>4</sup>

<sup>3</sup> Adapted from [http://en.wikipedia.org/wiki/Community\\_engagement](http://en.wikipedia.org/wiki/Community_engagement)

<sup>4</sup> Marine Scotland, 2014. An Assessment of the Benefits to Scotland of Aquaculture.



## 1.2. COMMUNITY ENGAGEMENT PLANNING REQUIREMENTS

With regard to the formal requirements for aquaculture applications to engage with communities through The Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, the following is applicable to ‘major developments’ i.e. sites which occupy a sea surface area of over 2 hectares in size:

### ***“Pre-application consultation (in the order)”***

*7.—(1) The prospective applicant is to consult as respects a proposed application every community council any part of whose area is within or adjoins the land where the proposed development is situated and in doing so is to give a copy of the proposal of application notice to the community council.*

*(2) The prospective applicant is to—*

*(a) hold at least one public event where members of the public may make comments to the prospective applicant as regards the proposed development; and*

*(b) publish in a local newspaper circulating in the locality in which the proposed development is situated a notice containing—*

*(i) a description of, and the location of, the proposed development;*

*(ii) details as to where further information may be obtained concerning the proposed development;*

*(iii) the date and place of the public event;*

*(iv) a statement explaining how, and by when, persons wishing to make comments to the prospective applicant relating to the proposal may do so; and*

*(v) a statement that comments made to the prospective applicant are not representations to the planning authority and if the prospective applicant submits an application there will be an opportunity to make representations on that application to the planning authority.*

*(3) A public event held by the prospective applicant in accordance with paragraph (2)(a) is not to be held earlier than 7 days after notification of the date and place of such event is given under paragraph (2)(b)(iii).*

In the ‘Protocol for preparing planning applications for aquaculture development’ the Scottish Salmon Producers Organisation (SSPO) provides further detail on consultation requirements through reference to ‘Circular 4/2009 Development Management Procedures’ and replication of the flow diagram in Figure 2.

Within the protocol, SSPO state that “companies will see to engage with councils, statutory agencies, local communities and other stakeholders as early as possible in their own business planning process”. They also place emphasis on engagement with communities through companies seeking “directly or through SSPO or ASSG, to build relationships with local community representatives”.

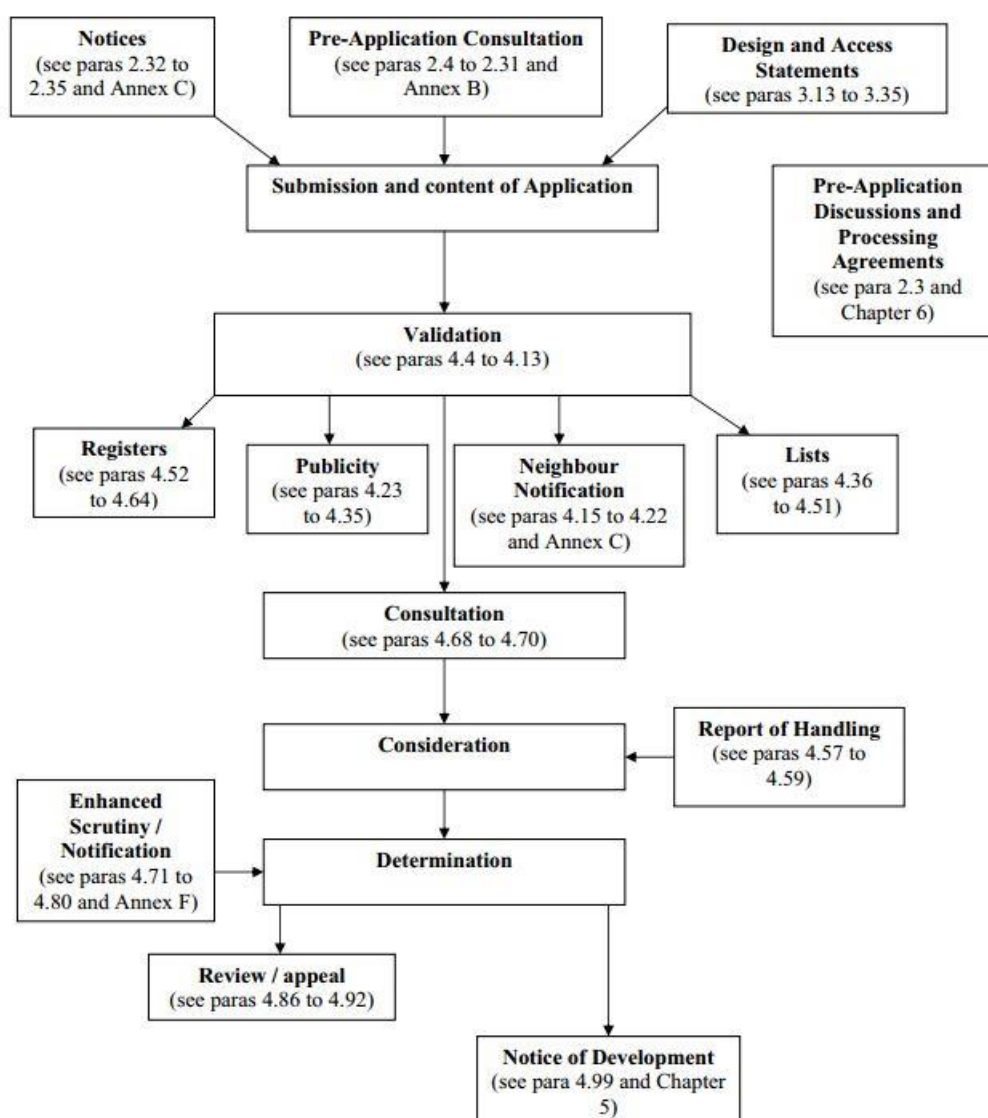


FIGURE 2. DEVELOPMENT MANAGEMENT PROCEDURES, PLANNING PROCESS DIAGRAM

The above information is not intended to cover the entire planning process for aquaculture development, however it is useful to understand the key requirements of legislation and guidance for community engagement during the planning process as context to what happens in reality, which will be discussed later in this report.

## 2. METHODOLOGY

Following on from the aims identified above, a consultation process was undertaken to assess how communities are currently engaged by and benefit from the aquaculture industry. To ensure a representative study, three distinct sub-regional case studies were agreed with The Crown Estate: Argyll, Shetland, and the Western Isles. Although the Highland and Orkney regions are also involved in aquaculture planning, time constraints did not allow for visits to all locations. Interviews were undertaken with stakeholders using a topic guide (Annex 1) which was split into three sections as follows:



- i. Provided background / context to what is involved in the aquaculture planning process (with a focus on the application and representation components of the process);
- ii. Investigated respondents perceptions of community engagement in the planning process;
- iii. Explored the continued engagement of communities after completion of the planning process.

Three key stakeholder groups were identified as pertinent to the aquaculture community engagement process: 1) Planners – through planning departments, 2) Industry - through aquaculture production companies and industry associations and 3) Communities - represented by Community Councils (CCs) – hence the focus on CCs in this report.

Local Authority (LA) planning departments across the three case study areas were contacted. A range of companies were interviewed from those with a team of community-engagement staff to those undertaking engagement singularly. Also, a range of CC representatives, with differing levels of engagement with aquaculture, contributed towards this study. A total number of 21 interviews were undertaken.

## 3. KEY FINDINGS

### 3.1. AQUACULTURE PLANNING PROCESS

This section provides some background to the aquaculture planning process and focuses upon respondent perceptions of how community engagement is recognised within the process.

All planners meet annually to discuss procedures and ensure consistency of approach throughout the aquaculture planning process (as well as other planning processes), however it has been suggested that despite this, there is some subjectivity in how the Town and Country Planning (Marine Fish Farming) (Scotland) Order 2007 is interpreted. For example, some shellfish businesses are required to do bird and otter surveys while others are not. Respondents pointed out that the planning process is quite prescriptive on when community engagement should happen and that there is quite a lot of unofficial guidance from planning in terms of what engagement planners are expecting to see. Essentially, the local authority needs evidence that a company has made an effort to engage with stakeholders including communities. No specific guidance exists for engagement when it is a minor application (<2 hectares) and applicants often keep applications within the minor application scale (i.e. 1.99999 hectares) to keep it within the shorter time and lesser cost.

#### 3.1.1. MAKING AN AQUACULTURE APPLICATION

A number of respondents noted the complexity of multiple approvals within the aquaculture planning process. It was suggested that the process was difficult, convoluted and time consuming – taking up to two years for an application to be approved. It was also explained that there is a lack of communication between different components of the planning process with examples provided of both Marine Scotland and SEPA providing contradictory intra-department responses. It was suggested that this complex process means that communities often get confused between applications for planning and for marine licenses (particularly in terms of 4 yearly marine license renewals which are misconstrued to be new applications). CCs can comment on CAR licenses, the Marine Licence and the Planning Application which causes confusion as each of these processes consider different aspects of the same farm. Similarly, the public don't understand the screening / scoping process and often think





the plan is set in stone by that time. Interviewees suggested that the process needs to be streamlined and made more understandable, e.g. through a one-stop shop, with the Shetland works license system held up as a good example. Interestingly, despite discussions of complexity in the process noted above, some CCs felt that the *“pathway for aquaculture is too easy at the moment”*.

Planning applications are sent to the CC secretaries weekly, but are based on the planning application address meaning that in some cases not all relevant CCs are aware of a planning application. It was suggested that CCs should be notified of developments ahead of a planning application as a matter of courtesy, and this will be discussed more fully in section 3.2.

Some CCs suggested that they were *“fighting an uphill battle”* in reference to the application process. It was however recognised that planners have a difficult job to do in the marine environment as planning becomes tighter and that it is not possible to please everyone all of the time. In some cases, the CC felt like they were working against the LA rather than with them and there was the perception that the LAs were secretive with information during the application process.

### **3.1.2. MAKING A REPRESENTATION**

Once an application is submitted it is then available online for comment. CCs may look at a number of aspects of the application including whether the development fits the location. They are looking for something which is *“No gonnæ offend Prince Charles, no gonnæ win any awards”*. The CC may also look at parking, access / egress to the shore base and whether roads can handle heavy vehicles. It was suggested that CCs (and the general public) may not fully understand the concept of ‘material considerations’ with valid grounds for refusal of an application being either environmental (including visual) or economic. In many cases, visual amenity is proposed by CCs as a reason for an objection. For every representation made, the planner will write a paragraph commenting on whether or not it is material.

A number of points were raised by respondents regarding the LA online portals (where members of the public can make a representation). It was suggested that they are not easy to access or use and could be improved. It was mentioned that as everything is now available online it should be a lot easier for people to make representations than it was previously. The authors of this study attempted to locate a means by which to make a representation for a proposal and the most easily available route to do this was via an anti-aquaculture website. Indeed, one respondent suggested that in the case of a specific controversial application: *“A lot of people wouldn’t have objected if it hadn’t been so easy”* in reference to the aforementioned anti-aquaculture website. Industry respondents noted that, in fact, they want to make it as easy as possible for positive representations to be made by communities. It should be noted, however, interviewees pointed out that by making the planning process available online, it invited representations from as far as New Zealand and Australia. This led to discussions regarding the weighting given to written representations and it has been suggested that more weighting should be given to locals over those who visit the area or are not resident.

Discussions highlighted the fact that the number of representations needed for an application to change from delegated authority to planning committee varies between Local Authorities and from 5 to 20. Once a decision is delegated to a panel it can add many months to the process which can have considerable implications for the farms. It can affect internal planning procedures, such as when to order fish for stocking the site currently in planning. Despite the efforts made by regional planners to ensure consistency of requirements for applications in Scotland, differences such as this highlight how





various local authorities can take a different approach to planning, which can cause confusion for applicants during the process.

### **3.1.3. CHANGING PATTERNS OF REPRESENTATIONS**

Throughout the course of interviews changing patterns of representations became apparent. Many respondents noted that there are not as many new applications but instead extensions. Even with new sites there is not the same volume of objections: *“There used to be objections about every site, but this has calmed down over time as people get used to seeing more shellfish and fish farms”*. A lot of the issues that people considered to be severe are now controlled by planning conditions with an average of 12 conditions per site including lighting and safety. It was also suggested that over the years the industry has developed it has become easier. This could be either as a result of communities become more aware and less sensitive or due to fewer new sites and mostly expansion of existing sites.

Also, respondents noted that differences of opinion in relation to aquaculture development are apparent between locals and those who move into the area - this can be seen most starkly between Argyll and Shetland with comments suggesting that more people move into Argyll and fewer incomers move to Shetland. Interviewees pointed out that Shetland is generally pro development, the only reason anyone goes there is to work and that *“Shetland CCs are more accepting because they understand the viability of communities from an economic perspective”*. This is in contrast to Argyll, where it was suggested that more people either move to the area for retirement or rely on tourism so industrial development is perceived differently.

## **3.2. COMMUNITY ENGAGEMENT IN THE AQUACULTURE PLANNING PROCESS**

This section focuses upon respondent perceptions and experiences of community engagement during the aquaculture planning process, and covers engagement by industry and with the LA. This section also describes points raised by participants regarding communication specifically with CCs.

### **3.2.1. COMMUNITY ENGAGEMENT BY THE LOCAL AUTHORITY**

Interviews revealed that there was quite a substantial feeling of disenfranchisement of CCs within the planning process; *“CCs do not feel involved in the process”* and often believing they are part of a ‘tick-box exercise’. In one particular case, where an application went to a planning committee, the CC felt that they were put under a lot of pressure and had to put a lot of effort in to do a presentation which they believed was ultimately ignored. They believed it was a *fait accompli* before the meeting was even held. It was suggested that the LA had advised the CC the decision was political and was to meet Scottish Government targets making communication between the LA and CCs problematic. CCs are feeling more disconnected and potentially apathetic with regards to their involvement in this process in future as they have been disrespected.

This disenfranchisement may be related to confusion regarding the importance of CC representations. Perceptions differ between those involved in the planning process with some respondents explaining that although CCs are statutory consultees, objections do not carry the same weight as Marine Scotland, SEPA or SNH. Others suggested that if a CC makes an objection and it can’t be mitigated then it must go to planning committee and therefore CC have significant weight.



### **3.2.2. COMMUNITY ENGAGEMENT BY THE AQUACULTURE INDUSTRY**

Respondents were clear about why it is important that industry engage with communities. Engagement can make the planning process simpler and faster, particularly where there is willingness by industry to compromise on size / location of development (respondents noted this has happened on a number of occasions). Also, keeping the community involved creates ‘shared values’. Indeed, some industry players believe that it is *“vital to include community in engagement”* regardless of whether it is minor or major development, and are already fully involved with community engagement - a best practice example can be seen in Box 1.

For those who are undertaking community engagement during the planning process, this is often based on advice from LA planning departments with the CC generally the first point of contact and further community discussions flowing on from this once the CC suggest who else should be engaged with. Planners often suggest holding public meetings whereas some in industry believe they can be a waste of time and become a debate on the pros and cons of aquaculture. Some respondents argued that well-advertised open days are much more useful for one-to-one discussion. Open days can include information on the company, where the farm and shore base will be, what people will see, boat traffic and often includes discussions regarding community benefit in terms of jobs. Often audio-visuals are used, and one company even used ‘heat maps’ to show available area for aquaculture developments. Respondents suggested that it is good to have site managers involved in the open days as they are the local contact but also have the knowledge to answer technical questions. Interviews did however also reveal that the open days were often poorly attended.

Engagement pre-application is very ‘ad-hoc’; some companies give lots of attention in advance and others don’t *“give the time of day”* and this is the case for both finfish and shellfish applications. Some CCs suggested that they had never been contacted prior to the planning application being submitted. In some instances, the industry is learning from mistakes. In one example, a CC was engaged with two applications from the same company, the first of which had very poor communication and transparency and not enough research undertaken which led to a number of issues. However lessons were learnt for the second application where designated staff members were made available to discuss developments and address any specific community concerns. One respondent noted that sometimes it is hard to identify who the stakeholder groups within the community might be and suggested that some guidance on stakeholder identification would be beneficial, perhaps as part of the pre-application consultation process.

It was suggested by some respondents that there was better acceptance for small local companies with a good name in the community, with trust and communication being key to community engagement practice. Respondents explained that some of the larger companies had entire teams dedicated to EIAs and community engagement, whereas some smaller companies did not have the available resources, although this was not to suggest that one was better than the other. Also, it was noted that with some shellfish businesses there was a difference between the level of engagement between those which are managed by local residents and those that are managed out-with the area.

Interviews revealed that a lot of time is spent by industry correcting misinformation from the internet and that it is crucial to be open and transparent, *“being open with communities all the way through makes it easier”*. A lack of knowledge means that the public are often unsure who to believe – well-presented information from a campaign group or industry? Some respondents felt that the industry



can be “*very secretive*” and that without appropriate information it is very hard for CCs to make an informed decision. Although, it was also suggested that the public was becoming more sophisticated and that there are a lot of professionals with access to computers. Timing was also raised by a number of respondents as important to community engagement. One interviewee even suggested that engagement was “*more about when you consult rather than who*”.

Comment was made during the study regarding the use of a democratic voting process which has been applied for proposed developments in the past. Although the result is not always in favour of the development, it was suggested that there is no point trying to “*shoehorn development into an area where people don’t want it*” as it will make for a difficult operation in the long term. This process has been successful in more remote or island locations where the community can be more easily defined, but is harder on the mainland where community / impact boundaries are harder to identify.

A number of respondents believed that it would be a positive move to develop standardised guidelines for community engagement, with suggestions that information relating to engagement should be included in the Code of Good Practice. Some interviewees pointed out that by standardising community engagement across Scotland, the needs of each council area may not be reflected. However, it was generally agreed that efforts should be made to ensure ‘*standardised outcomes*’ across Scotland so that the engagement and subsequent benefit / impact is as similar as possible, whilst still allowing a different approach to reaching this point as required.

#### **Box 1. Best Practice Case Example: Engagement by Industry within the Planning Process**

The application process begins with desktop-based research on physical area, demographics, tourism etc. This research stage also involves looking back through CC minutes to get general feeling for the location and an idea of important issues.

By the time screening/scoping starts, a number of non-statutory consultees including e.g. fisheries trusts have been contacted.

Open days and drop-in events are held at community halls, with slightly different approaches. Where aquaculture sites already exist: explain this is who the company is and what we do/how we benefit the community. Where no site exists: explain what fish farming is/what it looks like and correct misinformation from internet. “*Be totally open with people*”. Open days can be made fun with BBQs and fish-related games for children.

#### **3.2.3. COMMUNICATING WITH COMMUNITIES**

Some issues were raised relating to the flaws around having CCs as the main point of community contact. Several interviewees pointed out that engagement varies between locations with different CCs and this is dependent on the make-up of those involved, which inevitably can change from one year to the next. Having one anti-aquaculture person on a CC can impact the whole representation and often CCs only get involved when members are involved in active campaigning. It was suggested by a number of participants that CCs are not truly representative of a large proportion of the views of the community and that sometimes only those with the loudest voice are represented. A fundamental issue for industry when engaging with CCs is that it is not uncommon for there to be no functioning CC at all, particularly in rural areas with small populations. It is for this reason that a number of



respondents felt that it was important to undertake open days and to reach as wide an audience within the community as possible.

It was also suggested that there are difficulties with polarised communities where on one side there are locals who are invested in the area and pro-development, on the other side are people who have moved to the area and want to keep it pristine. One respondent suggested that weighting of community input in the planning process should be considered, based on 'spheres of influence'.

As the make up of a CC changes from one year to the next, CCs often don't know enough about the aquaculture planning system (although the same was also mentioned in relation to LA staff as well). Planners indicated that responses received from CCs suggest that at times communities struggle to get a handle on what they can and can't do within the planning process. A *"Key solution is helping CCs better understand the process"*. CCs need to be informed of the planning process and what is and is not a material consideration. One respondent pointed out that Marine Scotland and SEPA developed a 'working arrangements' document, which details what they consider and this could be relevant for communities. Alternatively, it was noted that LAs have pushed Government to develop a Planning Circular which clearly sets out Material Considerations, which could be used as a guide for CCs. The potential for training CCs was also mentioned by a number of respondents. Council Community Planning Partnerships are used to train councillors, but this could be applied to CCs also. The biggest issue here however is the number of CCs (in Shetland alone there are 22 CCs). Training of CCs had also been considered by industry with one company holding a councillor day in the Highland region (to inform councillors about aquaculture) but the turnout was poor with only one councillor turning up. One respondent noted that *"It is down to the companies and industry to get into the communities and educate them about aquaculture, the drive has to come from within the companies"*.

### **3.3. COMMUNITY ENGAGEMENT OUTSIDE OF PLANNING**

This section focuses upon continued community engagement in aquaculture after completion of the planning process. Although 'community relations' was raised to some extent, respondents concentrated more on the area of 'community benefit' (with a focus upon finfish rather than shellfish). A number of participants wanted to make it clear that community benefits need to be kept separate from the application process, otherwise there could be accusations of 'brown envelopes'. There was no consensus between interviewees regarding what community benefit means for aquaculture and it was noted that whilst it is easy to quantify jobs, but more difficult to quantify other benefits. The focus was upon 'direct' benefits rather than 'indirect' benefits (which were discussed more fully in the Marine Scotland Benefits of Aquaculture report).

#### **3.3.1. CURRENT PRACTICE IN AQUACULTURE**

Several interviewees pointed out that it is important to have good on-going community relations after the planning application has been completed. This could be continued through having a liaison officer (although one interviewee pointed out the importance of ensuring consistent company policy in regards to this both between sites and over time), or through scheduled update meetings. Respondents also noted that it was important to have staff fully integrated into the community, for example a site manager who sits on the CC and who is involved in local initiatives. This can lead to less negativity and it is more likely the company will be perceived as being local. An important point raised by several participants, which it was felt is often overlooked, was that ongoing community relations are also linked to the perception of aquaculture 'helping out the community'. This can include farms



lending a boat to move livestock from the mainland to islands for grazing or helping people who are in trouble on the water. A key comment which captures this point was that *“it is all about stewardship of the area – the farms have the equipment and trained people, so it is good to use them”*.

It was made clear on several occasions how important it is that the local site manager is first port of call for community engagement and that managers should have a good level of independence to work with the community. Problems are often dealt with during friendly discussions and if the problem can't be resolved by the site manager, then it would be escalated up to head office as required. It was noted by one respondent that *“everyone loses site of keeping things ticking over”*, and that issues are often resolved during a friendly chat and it would be difficult to encourage managers to keep a record of all resolved issues.

As was noted in the Marine Scotland Report a key perceived benefit of aquaculture is the provision of jobs. This was a perception held across the groups consulted in this study as *“everybody realises that the biggest benefit is employment – there is no getting away from that”*. A number of respondents pointed out that aquaculture allows people to stay in rural and remote communities. These jobs provide better career prospects for locals than there would have been in the past. Additionally, aquaculture, particularly shellfish farming, provides *“cross-fertilisation of income”*, through additional and diversified sources of income and employment in rural areas, which is particularly important during the initial stages of a shellfish farming business. In Shetland employment is *the* benefit - *“The Shetland way is not to be outspoken, they are accepting but not stupid. Anyone who creates jobs / wealth is welcomed with open arms”*. However, in other communities jobs are viewed as the *only* benefit of aquaculture but jobs in a rural area would not be equal to the longer term environmental impact which may affect fisheries.

Awareness raising and education was another area of perceived community benefit from aquaculture. An example of awareness-raising is the So Much to Sea campaign by Shetland Seafood ([www.somuchtosea.co.uk](http://www.somuchtosea.co.uk)). Since the roadshow people are more aware of seafood in Shetland and it has been a very demonstrable example of aquaculture getting involved in the community. A number of industry players have also been participating in education. School visits with products for students to see and try which they have found particularly rewarding. The industry has also worked with local schools in terms of skills development and bringing young people into the industry. Some participants noted that they didn't have the skill set or the time to get involved with education or school children, however, any tool kit developed for community engagement should include teaching material and games for kids.

Some interviewees pointed out that the industry often gets involved with communities in relation to looking after the marine environment. In many cases, the local community expect the industry to clean up mess on the shore, even if not from aquaculture, as it is important from a tourism point of view. On Shetland, finfish and shellfish farmers are involved with the 'Da Voar Redd-Up', helping to clear litter but also allowing use of farm boats and staff. It was noted that this helps to educate staff as to any environmental impacts of aquaculture litter, but also businesses were involved in educating children on what was litter from finfish and shellfish farms and what was not.

Sponsorship is the second most heavily cited benefit for the local community from aquaculture (and again was discussed in the Benefits of Aquaculture report). The industry supports a number of local interests including community halls, churches, sailing clubs, sporting and cultural events and sports



teams. In some cases, companies have a 'community trust' which communities can apply to for funding. Some interviewees did explain that sponsorship needed to be 'on message', in keeping with a company brand, and often related to education and health, fitting in with the perception of a healthy product.

**Box 2. Best and Worst Practice Case Examples: Engagement by Industry out-with the Planning Process (two geographically close sites, very different practice)**

**Best practice example:**

Where pre/during application community engagement is done by HQ, post-application (discretionary) engagement is largely delegated to the site manager.

Community engagement has included using farm boats to ferry livestock, lending boats, staff and produce for local events, putting down and maintaining moorings, and upcycling waste materials such as feed pipes to be used by local communities for creating poly-tunnels. The site manager is also involved in 3-monthly meetings regarding shared infrastructure where community concerns can be addressed *"communication is key"*.

**Bad practice example:**

*"There is a local focus on production rather than engagement"* leading to poor communication. Several incidents of concern to the local community, including morts left lying leading to olfactory issues and problems with road safety, had not been addressed satisfactorily by the local site manager. Issues were only addressed once a designated contact had been established higher up the chain.

**3.3.2. RENEWABLES AS A COMPARATIVE INDUSTRY**

A number of those interviewed believe that *"Community benefit is something that Government has recognised needs to be dealt with because of renewable energy"* and that in this respect it is all about the money for communities. However, the majority of those interviewed felt that aquaculture and renewables were not comparative industries. It was suggested that there are differences between the industry structures. Renewables in some cases were not perceived to be a proper commercial enterprise because of RoCs (now CfD), whereas aquaculture was. Respondents explained that aquaculture businesses are commercial companies which compete with each other whereas Renewables are more akin to a nationalised industry. Renewables developments can build community development costs into their budgets and planning as they know future income. It is not possible for aquaculture to do this as it is not under the same long term financial guarantees.

Interviewees also pointed out that Renewables provided high cash benefits but less wider benefits such as jobs, sponsorship and indirectly supporting community through use of shops / schools etc. Overall, it was felt that the Aquaculture industry was well-developed and was already working heavily with communities. It should not be compared to a new industry such as renewables as - *"the aquaculture industry is not saying 'no we won't' it is saying 'we already do'!"*. The aquaculture industry already perceives itself as benefitting communities through jobs and economic activity in the area,





other industries have changed the perception of ‘community benefit’ and concerns were raised that aquaculture runs the risk of setting a precedent that can’t be maintained by all parties. It was also suggested that aquaculture paying extra to be a part of a community would be counter-productive to building long term relationships. Overall, respondents felt that aquaculture focused more on community engagement, whereas Renewables is more about community benefit.

A specific example was given by one industry respondent who noted that an economic study had been undertaken for one of their farm sites, which indicated that around £150,000 per year was being put into the local economy through indirect benefits. Although this figure will vary depending on the type of farm and scale of operations, it is indicative of the level of indirect benefits of aquaculture which often goes unreported.

If aquaculture were to follow the renewables route of making community payments, it was suggested that the only realistic way it could be done would be by using Crown Estate funds. Biomass-related benefits, in a similar vein to MW-related funds for Renewables, would be very difficult to implement and enforce - particularly given the low number of new site applications (e.g. ~30% new sites versus ~70% extensions in Argyll in the last year), the varying scale of aquaculture operations and, perhaps most importantly, the fluctuating profit levels year-on-year experienced by the aquaculture sector. Respondents pointed out that due to the ‘boom and bust’ nature of aquaculture, there are years when more donations can be given and others when the industry struggles to pay wages. Some interviewees did not like the idea of providing community payments as there would be a number of downsides such as the company not receiving the same level of exposure, they would lose control over how the money is used and the communities wouldn’t know where the money comes from.

## **4. DISCUSSION & RECOMMENDATIONS**

### **4.1. KEY TAKE-HOME MESSAGES**

This study shows that improvements are required by all players in the aquaculture community engagement process: the local authority, the community councils and the industry. The results imply that the guidance available from LAs is varied, despite attempts to ensure consistency. The LA also needs to take more responsibility for communicating with CCs. Pre-application consultation between planning officer and developer should highlight which CCs are to be consulted and the person responsible for sending planning notices to CCs should communicate with the planning officer to ensure that no CCs are missed out.

The findings suggest that CCs may not always be the best way to engage with a community. In some instances they are not in place at all, sometimes there may be members who have a particular agenda and sometimes the small numbers of people involved are not representative of the wider community. There are certainly many CCs who have a genuine interest in representing the views of their communities, however it is important to note that it is a voluntary position which can take up a lot of time and can therefore be difficult for CCs to engage with every planning application they are presented with. It is not obvious how these issues could be changed and therefore CC consultation should be considered as one aspect of a balanced and well considered community engagement process.



The most efficient way to improve the community engagement process is for industry to take responsibility. If industry chooses not to pursue community engagement as a strategy, then it is clear from responses that *'less is definitely less'*. In situations where industry does a 'half-hearted' job it can end up leading to worse community perceptions than not undertaking community engagement at all. However, the aquaculture industry already does undertake a great deal of community engagement which is not always captured through a formal process and often goes unreported or unacknowledged.

The extent to which industry decides to standardise community engagement must be decided at a national level but take into consideration the fact that community engagement will differ according to the region, scale of development and individual company approach. The standardised outcomes should be the attainment of 'social licence', and this should be engagement related rather than benefit related.

Finally, it is important to note that communication is imperative and it should be three-way process involving industry, the Local Authority and community councils.

## **4.2. RECOMMENDATIONS**

Three specific points should be considered in order to move forward with community engagement:

1. Firstly, it should be made as easy as possible for a member of the community to make a representation, be it positive or negative. Currently, anti-aquaculture groups make the process of making a negative representation easy by providing links on websites. The same needs to be done for positive representations and it may be that the industry is lacking in this regard. One option to help address this would be to include information on making a representation in publicity materials, such as leaflets and posters, during the application process. Within the onshore renewables sector it is also standard practice to have a project website for each development – this could be applied more in aquaculture as a page within existing company websites and include links to make representations from there as well.
2. Secondly, there currently appears to be a difference between the weighting given to community council representations and the weighting applied to other representations. If more than a set number of representations are made, it automatically goes to planning committee, whereas a negative response from CC doesn't necessarily mean this will happen. This effectively can give more weight to those who are not directly affected by the development and should be re-considered.
3. Finally, and perhaps most importantly, the development of a standardised best practice protocol or 'Code of Good Practice' for community engagement is both required and supported by the aquaculture industry. This protocol must acknowledge that there will be limitations in terms of what can be committed to, but ensure due attention and care is given to communities. In addition to this protocol, a toolkit should be designed by which to make community engagement easier and more streamlined for the industry. An important point to note is that this should be accessible and readily implementable by farm managers at all scales of operation to help ensure a level of standardisation of community engagement throughout the aquaculture sector in Scotland.



The toolkit would ideally include, but not be limited to, the following:

- Information materials regarding aquaculture and the planning process, tailored as required for the specific requirements of Community Councils, Local Authority Councillors and the general public.
- The further development of industry websites to promote best practice in community engagement. This is an important consideration going forward as part of a wider engagement process highlighting what is already done by the industry and where (as per the first recommendation above). This could be expanded within company websites as well as industry organisations.
- Education materials for schools developed in line with the curriculum for excellence to make it easier for industry professionals to engage with local communities. Ideally this would also include development of physical resources which could be transported as required to schools and events. A large-scale example would be the 'lab in a lorry' project (<http://www.labinalorry.org.uk/>), however smaller pop-up educational trailers are also a highly effective tool which could be used to travel between venues. Other promotional materials, such as those used in the somuchtosea campaign in Shetland, are a good way of showing the wider public more of what is happening in the aquaculture industry ([www.somuchtosea.co.uk](http://www.somuchtosea.co.uk)).



## 5. ANNEX 1. TOPIC GUIDE

### Aquaculture Community Engagement and Accountability Tool

*Standardising how aquaculture operations engage with and empower communities to enhance social benefits and community cohesion with a focus on farms placing greater emphasis on stewardship of resources*

#### 1. INTRODUCTION

- Introduce self and project
- Explain
  - no right or wrong answer
  - length of interview
  - voluntary nature of participation and right to withdraw
- Confidentiality and how findings will be reported
- Any questions they have

#### 2. BACKGROUND OF INTERVIEWEE

- Role played in community including job and other activities (i.e. social groups)
- How does role relate to aquaculture?

#### 3. AQUACULTURE PLANNING PROCESS

- Role in the aquaculture planning process
- Experience of the aquaculture planning process
- Good points and bad points in aquaculture planning
- Improvements to the planning process

#### 4. COMMUNITY ENGAGEMENT IN AQUACULTURE PLANNING PROCESS

- Importance of engaging with communities during planning process
- Current community engagement in aquaculture planning process
- Improvements to community engagement in the planning process

#### 5. COMMUNITY ENGAGEMENT IN AQUACULTURE (OUTSIDE OF PLANNING)

- Importance of communities being involved with aquaculture outside of planning
- Experience of aquaculture and community engagement
- Good and bad points of community engagement with aquaculture
- Improvement of community engagement with aquaculture (outside of planning)

#### 6. SPIDER DIAGRAMS

- Introduction to Sustainable Livelihoods Approach (SLA)
- Do you feel these accurately reflect social / livelihood impacts of aquaculture?

At end of interview:

- Thank respondent for participation in interview
- Provide reassurances about confidentiality

Imani Development & SRSL for The Crown Estate, January 2015



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