

## 4 CONSULTATION

### 4.1 Introduction

4.1.1 This chapter of the Environmental Appraisal outlines the stakeholder engagement activity undertaken on the Proposed Project to date, and describes the consultation strategy adopted during the environmental appraisal process. Consultation and stakeholder input has been integral to the design and development of the Proposed Project, identification of existing environmental constraints and sensitivities and identification and appraisal of the potential environment impacts of the Proposed Project.

### 4.2 National Grid's commitment to engagement

4.2.1 The section of National Grid overhead line (OHL) has been prioritised as part of the VIP Project in Snowdonia runs close to a number of properties and communities, particularly Minffordd, Penrhyndeudraeth and Bryn Glas. The area also attracts a significant number of visitors and tourists associated with the Portmeirion and the Dwyryd Estuary.

4.2.2 Under Section 38 and Schedule 9 of the Electricity Act 1989, National Grid has a duty to have regard to the desirability of the preservation of amenity: the natural environment, cultural heritage, landscape and visual quality, as well as the effect of National Grid's works on communities. The five Guiding Principles contained in the VIP Policy<sup>1</sup> document make specific reference to these aspects of the protected landscapes in which all of the VIP Projects are located.

4.2.3 In addition, National Grid's Stakeholder, Community and Amenity Policy<sup>2</sup> sets out a commitment to meet this duty. It makes the following commitments to consultation when undertaking electricity works:

*"We will promote genuine and meaningful stakeholder and community engagement. We will meet and, where appropriate, exceed the statutory requirements for consultation or engagement. We will adopt the following principles to help us meet this commitment:*

- *we will seek to identify and understand the views and opinions of all the stakeholders and communities who may be affected by our works;*
- *we will provide opportunities for engagement from the early stages of the process, where options and alternatives are being considered and there is the greatest scope to influence the design of the works;*
- *we will endeavour to enable constructive debate to take place, creating open and two-way communication processes;*
- *we will ensure that benefits, constraints and adverse impacts of proposed works are communicated openly for meaningful stakeholder and community comment and discussion;*
- *we will be clear about any aspects of the works that cannot be altered;*
- *we will utilise appropriate methods and effort in engaging stakeholders and communities, proportionate to the scale and impact of the works; and,*

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<sup>1</sup> <https://www.nationalgrid.com/sites/default/files/documents/37295-Policy%20document.pdf>

<sup>2</sup> [https://www.nationalgrid.com/sites/default/files/documents/National%20Grid\\_s%20commitments%20when%20undertaking%20works%20in%20the%20UK.pdf](https://www.nationalgrid.com/sites/default/files/documents/National%20Grid_s%20commitments%20when%20undertaking%20works%20in%20the%20UK.pdf)

- *we will provide feedback on how views expressed have been considered and the outcomes of any engagement process or activity”.*

### **4.3 Initial Engagement on the VIP Project**

4.3.1 National Grid's VIP Project has been stakeholder-driven from the outset. Both National Grid and Ofgem have always maintained that for the project to succeed, it is vital that stakeholders play an ongoing central role in helping to identify those areas and existing OHLs which would benefit most.

4.3.2 The Stakeholder Advisory Group (SAG) was established in April 2014 and comprises an independent group of stakeholder organisations, chaired by environmentalist, Chris Baines and comprising senior representation from 15 English and Welsh stakeholder bodies namely: Cadw, the Campaign for National Parks, Campaign to Protect Rural England, The Campaign for the Protection of Rural Wales, Historic England, the Landscape Institute, the National Association for Areas of Outstanding Natural Beauty (AONBs), National Parks England, National Parks Wales, the National Trust, Natural England, Natural Resources Wales, The Ramblers, Visit England and Visit Wales.

4.3.3 The members advise the Proposed Project on key decisions and on the most effective ways to engage with local stakeholders outside the SAG. In the same way at a local level, an independent Stakeholder Reference Group (SRG) has been established in each VIP priority area. The Snowdonia SRG was set up in early 2015 and includes representatives from Gwynedd Council, Snowdonia National Park Authority, Gwynedd Archaeological Planning Service, Gwynedd Council Planning Service, National Trust, Natural Resource Wales, Cadw and Network Rail. In 2018, elected member representatives from Penrhyndeudraeth Town Council, Talsarnau Community Council and Maentwrog Community Council were invited to join the Group. The input of local people, from local enthusiasts to residents and technical experts, has been sought throughout the Proposed Project.

4.3.4 Following the first meeting of the VIP Project's SAG, it was agreed that National Grid's VIP team would visit main contacts at all 30 of the AONB Partnerships and National Park Authorities which were eligible for VIP. Having identified a shortlist of 12 subsections of OHL in October 2014 in eight designated areas, the SAG asked National Grid to carry out early stage engagement with stakeholders and the public at a local level.

4.3.5 In Snowdonia, the aim of this early engagement was to gather information and intelligence on the area to inform the options appraisal and to gauge local attitudes and opinions to the proposals. It was also felt that involving local groups and individuals at the outset would not only help to identify any potential challenges, but also to give the local community a sense of ownership.

4.3.6 In its guidance for consulting on planning applications, the government notes that early involvement of local communities, local authorities and statutory consultees can bring about significant benefits for all parties. It allows members of the public to influence the way projects are developed and how they are integrated into the community. It helps local people understand better what a particular project means for them, so that concerns resulting from misunderstandings are resolved early. It allows an applicant to obtain important information about the economic, social and environmental impacts of a project from consultees so that potential mitigating measures can be considered and, in some cases, built into the project before an application is submitted.

4.3.7 The government guidance also notes:

*“To manage the tension between consulting early, but also having project proposals that are firm enough to enable consultees to comment, applicants are encouraged to consider an iterative, phased consultation consisting of two (or more) stages, especially*

*for large projects with long development periods. For example, applicants might wish to consider undertaking informal early consultation at a stage where options are still being considered. This will be helpful in informing proposals and assisting the applicant in establishing a preferred option on which to undertake formal statutory public consultation.”*

4.3.8 In line with this guidance, National Grid has already undertaken numerous stages of consultation. This has provided the opportunity for people to share their comments and opinions so that these could inform decisions made by the SAG, the Snowdonia SRG and National Grid prior to the presentation of a proposal for more formal consultation prior to planning submission.

4.3.9 National Grid’s intention was to work closely with Gwynedd Council, Snowdonia National Park Authority, and key stakeholders to present a collaborative, inclusive partnership approach to the local community. Activity to date is summarised below.

#### **4.4 Early Engagement on the Proposed Project**

4.4.1 An initial scoping meeting for the early engagement work was held between National Grid and a broad range of stakeholders (January 2015) and an overall approach to engagement discussed. The early engagement programme involved:

- A technical workshop in January 2015 for key representatives from Snowdonia National Park Authority and other key statutory bodies identified by the authority. These included representatives from Cadw and National Resources Wales. This group formed a SRG for the Proposed Project.
- A bi-lingual public drop-in event on 27th January 2015, attended by 41 people, with consultation documents available in Welsh and English.
- Engagement with Llyr Gruffydd AM, Liz Saville-Roberts MP and ward councillors for Trawsfynydd and Penrhyndeudraeth, as well as further officials at Gwynedd Council.
- Technical feedback from the Snowdonia SRG, along with the opinions of local people and other non-technical groups who attended the drop-in session was then fed into the ‘Options Appraisal Study’<sup>3</sup> prepared for Snowdonia.
- A second meeting of the SRG took place on 13th August 2015. Following the incorporation of further stakeholder feedback, the ‘Options Appraisal Study’ for Snowdonia was then presented to the SAG in September 2015 and formed one of the documents that informed the Group’s decision on the priority schemes.

4.4.2 The project obtained coverage in media:

- ‘Pylons to be removed from Snowdonia National Park to improve views’ 15 September 2015 Daily Post North Wales (online);
- ‘Snowdonia pylons could be removed under new plans’ 15 September 2015 ITV Wales (online);
- ‘Interview about the project with Hector Pearson, Senior Project Manager, National Grid’ 15 September 2015 BBC Wales; and,
- ‘Removal of Snowdonia pylons leads to further calls to protect Anglesey’ 16 September 2018 Daily Post North Wales (online).

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<sup>3</sup>[http://snowdonia.nationalgrid.co.uk/wp-content/uploads/2016/06/150915\\_Snowdonia\\_DOR.pdf](http://snowdonia.nationalgrid.co.uk/wp-content/uploads/2016/06/150915_Snowdonia_DOR.pdf)

- 4.4.3 Following the incorporation of further stakeholder feedback, the Options Appraisal Report<sup>4</sup> for Snowdonia was presented to the SAG in September 2015 and formed one of the main documents that informed the Group's decisions on which should be the priority projects.
- 4.4.4 Following the September 2015 SAG meeting, the section of OHL near Penrhyndeudraeth (4ZC) was selected as one of the four priority projects for further investigation.
- 4.4.5 National Grid directly informed Snowdonia National Park Authority and the communications team at Gwynedd Council and spread the word widely through media releases, social media and other communications. Direct communication was also made with members of the SRG and those who had registered for updates via the VIP Project website [www.nationalgrid.com/VIP](http://www.nationalgrid.com/VIP).
- 4.4.6 MPs and elected members from town and community councils were also written to and meetings offered on an individual basis. Following the announcement in September 2015, the VIP team, its appointed environmental consultants and consents team have been liaising with Snowdonia National Park Authority, Gwynedd Council, members of the SRG and other relevant technical organisations to explore potential options further.

## 4.5 Further Engagement on the Proposed Project

- 4.5.1 Consultation with statutory consultees and other organisations continued throughout the environmental appraisal process to obtain environmental data, to discuss and agree the scope of, and methods of appraisal for individual environmental topics, and to develop appropriate environmental mitigation measures. The further engagement programme has involved:
- Further SAG meetings undertaken in April 2016, September 2016, December 2016, April 2017, November 2017, February 2018, September 2018, December 2018, March 2019 and November 2019.
  - SRG meetings undertaken in January 2015, August 2015, April 2016, September 2016, September 2017, July 2018, November 2018, June 2019 and December 2019.
  - Direct engagement – a comprehensive stakeholder database has been produced for the Proposed Project. Individuals and organisations are segmented into groups. As well as the SAG, individuals and groups have been engaged via a mix of one-to-one meetings (where appropriate), presentations to small groups, letters, email updates and phone conversations.
  - Third party channels – National Grid has worked with the communications teams of those stakeholders where they have an existing relationship to disseminate information through established membership, social media and other channels. This has included Gwynedd Council, Penrhyndeudraeth Parish Council, Natural Resources Wales, the Snowdonia Society and Snowdonia National Park Authority.
  - Media relations – regular updates to the local media on Proposed Project milestones and to publicise the summer drop-in events.
  - Drop-in events – these were held in July 2016 in Snowdonia National Park Authority offices in Penrhyndeudraeth, and Holy Trinity Church Hall in Penrhyndeudraeth. The events were attended by members of the VIP team together with relevant

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<sup>4</sup> <https://www.nationalgridet.com/document/84101/download>

professional advisers. Printed and online feedback forms were available at the events to provide feedback via the website or freepost at a later date. 107 people attended over the two days with around 80% of those who submitted a feedback form being in favour of the project.

- Further drop-in events were held in November 2018 at Snowdonia Park Authority Offices, the Neuadd Goffa Penrhyndeudraeth and Talsarnau Village Hall, again covering weekend and evening hours to maximise opportunities for engagement. The events were staffed by the VIP team and specialist advisors who updated the local community on the progress of the project and gave details on the construction plans. Feedback forms were present and the comments given were used to help shape the planning application. A total of 102 people attended the public exhibition over the three days, to date, 36 pieces of written feedback have been received. All were supportive although four respondents wanted National Grid to extend the project eastward removing pylons beyond Llandecwyn to Llyn Tecwyn.
- During the Pre-Application Consultation a drop-in event was held on 11 December 2019 at the Snowdonia National Park Authority Offices in Penrhyndeudraeth. 41 people attended this event, including representatives of Snowdonia National Park Authority, CPRW, North Wales Wildlife Trust, the Snowdonia Society, Ffestiniog Railway, local business owners and residents and landowners.
- Snowdonia VIP Website – a dedicated dual language website (<http://snowdonia.nationalgrid.co.uk/>) has been established with a focus on information specific to the Proposed Project, notification of drop-in (and other) events and the chance to relay comments and views.
- The National Grid VIP team also took a stand and gave presentations at the 2014 and 2015 Landscape for Life Conferences organised by the National Association of Areas of Outstanding Natural Beauty. In 2014, Chris Baines gave a keynote speech and in 2015, Hector Pearson addressed a plenary session on the VIP project which was followed by a workshop on the Landscape Enhancement Initiative element of VIP.

4.5.2 Environmental Appraisal topic-specific consultation is summarised in each chapter of this Environmental Appraisal where relevant.