Grant Agreement Number: IEE 12/794/SI2.646306

BEST GRID
testing better practices

D6.2 Report on 2 external stakeholder workshops and on 2 international mini-workshops

National Grid, Phil Pryor

nationalgrid

National Grid
Phil Pryor
Email: phil@pryorconsulting.co.uk
http://www2.nationalgrid.com/uk/

Co-funded by the Intelligent Energy Europe Programme of the European Union

BEST GRID
testing better practices

1. Content

2. Introduction

The BESTGRID project is an International Project focussed on sharing and delivering environmental and stakeholder engagement BEST PRACTICES in the delivery of energy infrastructure projects.

This project aims to improve the practices of Transmission System Operators (TSO) and Stakeholder groups to facilitate better relationships and enable a transition to more sustainable energy production and transportation.

The BESTGRID project is working with TSOs and NGOs to develop BEST PRACTICES for infrastructure delivery that will improve stakeholder acceptance take place with the highest standards of environmental management and potentially deliver enhanced benefits. Importantly the project is focussed on creating credible and practical actions to implement the BEST PRACTICES identified.

National Grid is responsible for the delivery of Work Package 6 (WP6). WP6 is focussing on the Marine and Land Interface environments for the development of subsea infrastructure.

A key element of the delivery of these BEST PRACTICES is to understand what constitutes Best Practice. The best way to achieve this is by directly engaging the stakeholders, both individually and collectively.

For WP6 this has taken the form of surveys and workshops. This report focuses on the inputs, process and outputs of this form of engagement prior to the formulation of an action plan to implement the findings

3. Background

National Grid joined the BESTGRID project, initially with a view to undertake the Best Practice work on a ‘live’ project. However it became clear during the development phase that despite having undertaken a number of Offshore projects already, none of the identified projects would progress at a suitable rate

to properly test BEST PRACTICES in the area's identified, namely within the area of Permitting and stakeholder engagement.

As a result it was decided to look back, retrospectively, at a Project that was already, and recently, advanced through both the permitting and stakeholder engagement phase, Project NEMO.

Information about The Nemo Link® Project can be found here;

- The Nemo Link® Project

Taking this retrospective approach enabled National Grid to engage with those who had current and relevant experience with permitting and stakeholder engagement processes; to consider what had gone well and not so well and to be current enough to have a good idea of how to improve the processes.

National Grid was also able consult on a wider range of projects from internal sources to benchmark against the external consultations undertaken.

Overall this approach has provided an excellent basis for learning and improving the delivery process for future offshore infrastructure projects

4. Objectives

Work Package 6 has a number of key objectives and deliverables and these are detailed below.

The Key outputs of WP6 are;

- O6.1: Actionable approach to increase public acceptance of marine/interconnector projects developed together by TSOs, NGOs and international experts
- O6.2: Recommendations on innovative communication material and strategy developed to increase awareness, transparency and public acceptance for international grid development, which can be adapted to any future grid development project across the EU
- O6.3: Development of practical approaches to increasing public acceptance, which can be applied to any future grid development project across the EU, through consultation directly with external stakeholders and via 2 managed workshops.
- O6.4: Development of recommendations with respect to the benefits, or not, of early engagement with international stakeholders in grid planning and permitting, developed in conjunction with Transmission System Operators, Non-Governmental Organisations and independent experts.
- O6.5: Development of recommendations with respect to the benefits, or not, of early engagement with international stakeholders in grid planning and permitting, which can also be adapted to future grid development projects, especially interconnectors between EU member states. Recommendations to be developed through consultation directly with external stakeholders and via 2 managed workshops.
- O6.6:Summary of lessons learned within Work Package 6 and presentation to appropriate audiences to encourage their transfer into other countries in the EU, especially interconnectors between EU member states

Key Deliverables of this work package:

- D6.1: A Marine action plan to improve public acceptance, including recommendations on communication materials and improving early engagement with environmental and landscaping authorities in marine/interconnector projects.
- D6.2: A report on 2 external stakeholder workshops and on 2 international permitting/planning mini-workshops.
- D6.3. Two presentations detailing the experiences and lessons learnt made in the pilot project from the point of view of the TSO

5. Approach

A major consideration in getting the most from Work Package 6 (WP6) was how to run the workshops on Speeding Up Permitting and Improving Public Acceptance in the most effective way. It was also unclear at the time how much commonality or crossover there was or would be between these two elements of work.

After discussion the approach illustrated in Figure 1. was adopted and is described below;

Initially a process of assessing the stakeholder engagement already conducted for consultation on project NEMO was completed. In order to achieve this the records for consultation on the Nemo project were reviewed and all of the key stakeholders identified and contacted.

This was followed by an internal consultation (within National Grid only), through a series of interviews and email exchanges with personnel engaged both on the NEMO project and other Marine projects at different stages of development. The objective being to determine the Transmission System Operators views on performance during Nemo consenting and stakeholder engagement and other similar projects.

Next the documented responses from identified stakeholders on the NEMO project, with respect to both permitting and acceptance, from consultations were reviewed. This was in addition to classifying stakeholders according to their main area of interest; that of permitting (mainly Government bodies) or public acceptance (both Government and public bodies)

Following this process and initial analysis of the TSO's views, a series of questions for stakeholders was developed in consultation with IIASA (see Appendix 1). The intention was to draw out views for comparison with the internal analysis already conducted as well as providing more open questions. These were to be answered personally with an experienced member of each stakeholder group, during an interview process.

The interviews with stakeholders were conducted over a 2-week period by telephone and notes of each discussion taken.

The next step was to conduct a comparison and evaluation between the internal assessment of performance and effectiveness and the stakeholder views of performance and effectiveness as recorded from the interview process.

The goal was to understand whether stakeholders agreed or disagreed with our internal assessment of overall performance, of National Grid's own performance and whether they considered that they could improve their own performance and if so how.

The outcome of this comparison process was an 'internal' lessons learnt document and a draft improvement plan based upon these lessons learned.

At this stage this improvement plan did not consider the practicalities of implementation and was not subject to wider consultation within either the stakeholder or Bestgrid Project.

The combination of information from interviews and internal consultation and the production of draft improvement actions enabled the project team to prepare a set of Improvement 'themes' where specific common issues that were highlighted could be grouped together to facilitate discussion in a workshop environment.

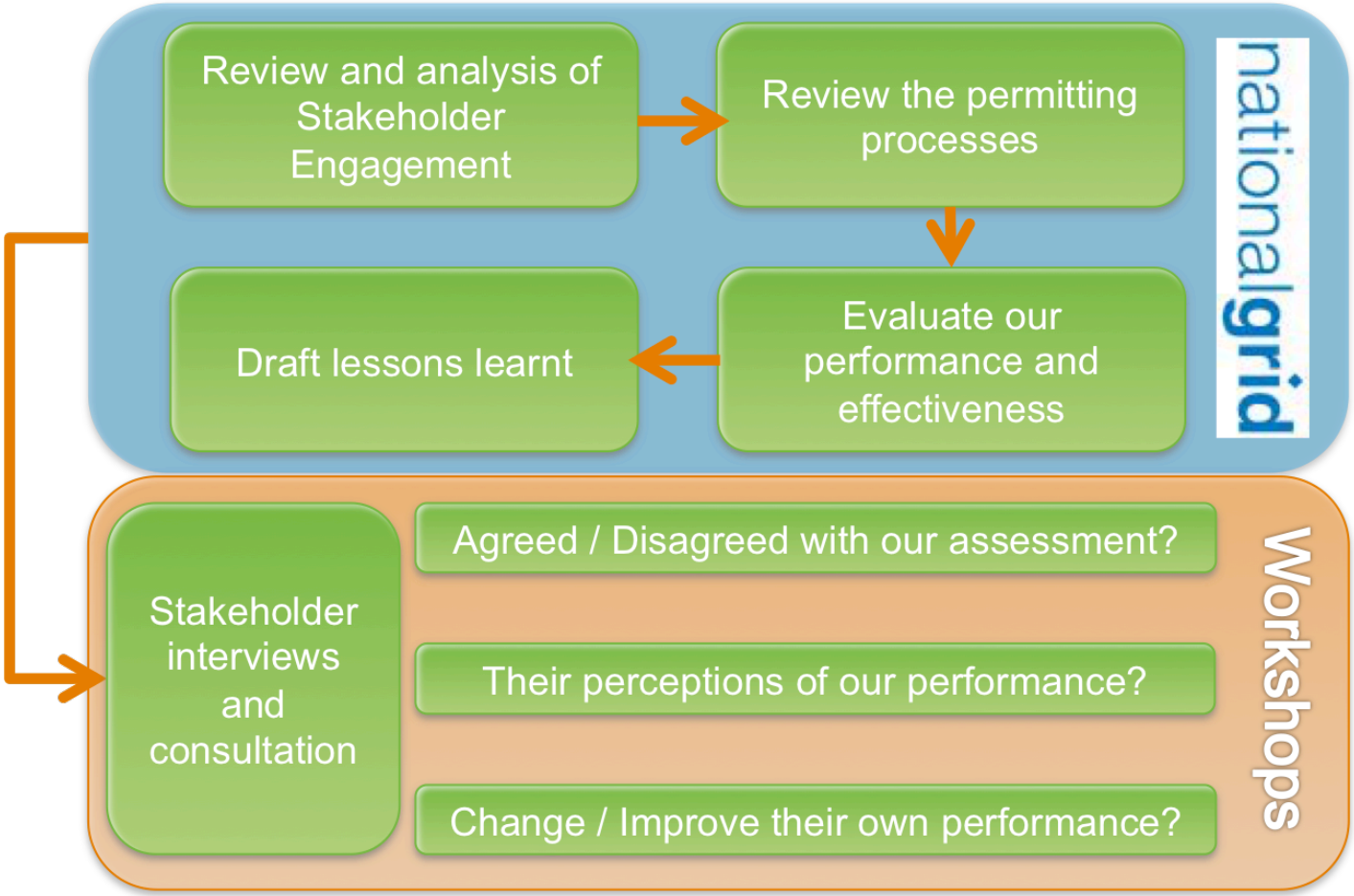
These themes are detailed below.

- Knowing Your Stakeholder
- Facilitating stakeholder engagement
- Discipline (Records, timekeeping, planning and preparation for engagement.
- Data access/co-ordination
- Knowledge transfer and continuity

Environmental Impact Assessment & Habitats Regulations Assessment

This process also enabled the project team to understand the range of stakeholders to invite to the workshops and to understand how much commonality there was or was not between the permitting and public acceptance processes

Figure 1. Workshop Approach



6. Information Gathering

In order to gather the right information to make the workshops effective the team first identified all of the stakeholders engaged on the successful NEMO project.

Stakeholder mapping for marine projects, particularly marine projects crossing International boundaries, is a complex process.

In all countries high-level stakeholder mapping is very clear, this normally applies to ‘statutory’ stakeholders. Consultation of such stakeholders is ordinarily mandatory and designated by government. Examples of such stakeholders are marine management and licensing organisations, those responsible for the development of marine spatial plans, the management of shipping, maritime safety and security, national environmental and scientific organisations and national defence bodies.

As these stakeholders are designated statutory, they have a direct effect on the efficiency and consequently the speed of permitting, in addition to acting as the voice of the general public with respect to public acceptance in major infrastructure.

Other stakeholders, often overlooked but that have a significant effect are both marine economic and leisure users for example fishermen, marine industry e.g. oil and gas, aggregate extraction, yachting associations, and near shore leisure organisations like windsurfing, surfing and jet ski organisations.

As the infrastructure reaches the shoreline the impact of the marine infrastructure becomes more obvious in its effect and public acceptance becomes a significant issue, rather than permitting which is usually the more dominant element further offshore.

The shoreline/landing point interface is particularly important for marine projects due to the significant bearing on the routes taken and consequently the viability of such projects.

The land/sea interface is within the scope of WP6. Whilst in overall terms the landing point is often a small element of an overall marine project, it has significant financial impact due to the fact that any change to the location of the landing point can materially affect, in both financial and physical terms, the cable route; it is both the most sensitive location in terms of stakeholder acceptance and permitting efficiency due to the often highly populated, environmentally and spatially sensitive and geologically/terrain sensitive nature.

It is also the most difficult interface to manage as the authority between offshore bodies and onshore bodies transitions at this point, but not always with clear boundaries of responsibility or understanding/coordination of roles.

Due to many of the points described above a number of less obvious stakeholder organisations become important and more difficult to identify in any mapping process. This manifests itself not only in terms of who is affected by a proposed project but when, and indeed, if they are affected. It is not uncommon for a marine project to undertake options analysis on a number of landing points. Consequently the desire to engage with stakeholders to understand and inform decision making needs to be balanced against the potential to cause concern when projects may only be at an exploratory stage and may never be developed further.

Examples of such stakeholders include Harbour authorities and local wildlife trusts and environmental organisations as well as resident's organisations.

Analysis of the NEMO project revealed a highly hierarchical approach was taken in terms of stakeholder mapping.

It also became clear that as more detail on project location emerged and direct and specific stakeholder contact took place, it was important to ask more local, specific organisations about other stakeholders that may be affected and have valuable views, particularly as such organisations may not necessarily be easily contacted or have a public presence.

The key stakeholders identified and engaged on the project for the UK Marine and Land/sea interface elements are listed below.

- Joint Nature Conservation Committee ("JNCC")
- Marine Management Organisation ("MMO")
- Kent and Essex Inshore Fisheries Conservation Authority ("KEIFCA")
- Thanet Fishermen's Association ("TFA")
- Trinity House Lighthouse Service ("THLS")
- Sandwich Port and Haven Commissioners
- Maritime and Coastguard Agency ("MCA")
- Natural England ("NE")
- English Heritage ("EH")

- The Crown Estate (“TCE”)
- Centre for Environment Fisheries and Aquaculture Science (“CEFAS”)
- Environment Agency (“EA”)
- Port of Ramsgate
- Thanet District Council (“TDC”)
- Royal Yachting Association (“RYA”)
- Kent Wildlife Trust (“KWT”)
- Royal Society for the Protection of Birds (“RSPB”)
- National Trust (“NT”)

NEMO is a cross border marine project between Belgium and the UK. As such Belgian stakeholders in the marine environment were also identified. However the NEMO project also crossed French waters so a further set of stakeholders was identified and consulted. Belgian and French stakeholders consulted are identified below.

- Management Unit of the North Sea Mathematical Models (“MUMM”)
- Le Département Pas De Calais
- Préfecture Maritime de la Manche et de La Mer Du Nord
- Direction des Territoires et de la Mer du Nord
- FOD Economie, KMO Middenstand en Energie
- CLPM Calais
- CLPMEM Dunkerque
- Direction Inter-Régionale de la Mer – Manche Est – Mer du Nord
- CME
- Comité régional des pêches maritimes et des élevages marins (“CRPMEM”)
- Ministère de L’Écologie, du Développement durable et de l’Énergie

Following identification and mapping of stakeholders returns records of consultation discussions, meetings and responses were gathered and assessed and a ‘picture’ of how effective the NEMO project consultation process was perceived by stakeholders and permitting authorities was created.

This process provided the input data for the design and preparation of questions to interview stakeholders and Permitting authorities for direct feedback and to inform the areas the project should focus on for Best Practice improvement in Permitting and Stakeholder engagement.

a Interviews

For the interview process stakeholder organisations were contacted and asked to participate. Those that were willing to do so were categorised into those that were focussed on permitting and those that were focussed on stakeholder acceptance.

Questionnaires were sent out in advance to give people time to consider responses. One written response was received due to the comment that the organisation didn't have the time to participate in a call.

The organisations that participated are shown in Table 1 along with their classifications.

Table1:

Stakeholder	Public Acceptance	Speeding Up Consenting
Joint Nature Conservation Committee ("JNCC")		
Marine Management Organisation ("MMO")		
Kent and Essex Inshore Fisheries Conservation Authority ("KEIFCA")		
Thanet Fishermen's Association ("TFA")		
Trinity House Lighthouse Service ("THLS")		
Sandwich Port and Haven Commissioners		
Maritime and Coastguard Agency ("MCA")		
Natural England ("NE")		
English Heritage ("EH")		
The Crown Estate ("TCE")		
Centre for Environment Fisheries and Aquaculture Science ("CEFAS")		
Environment Agency ("EA")		

Port of Ramsgate		
Thanet District Council (“TDC”)		
Royal Yachting Association (“RYA”)		
Kent Wildlife Trust (“KWT”)		
Royal Society for the Protection of Birds (“RSPB”)		
National Trust (“NT”)		

As can be seen most stakeholders have an interest or impact in both areas. This reinforced the view that it is very difficult to separate the two activities/focus.

Appendix 1 contains the questionnaires used for interviews with stakeholders.

7. Mini-Workshop No.1

The first workshop was organised to take place on Nov. 12th 2014 in London to discuss best practice on improving public acceptance.

a Meeting set-up

Participation

National Grid: Phil Pryor (National Grid BESTGRID Manager), Alison Rood (Consents officer), Mark Pearce (project coordinator Nemo), Phil Armstrong (Corporate Affairs)

External: Rachel McCall (Nemo Marine Advisor), Ivan Scrase (Royal Society for the Protection of Birds), Merlin Jackson (Thanet Fisherman Association), Robert Holden (Sandwich Port & Haven Commissioners), Antina Sander (Renewables-Grid-Initiative, BESTGRID project coordinator)

- Before the workshops took place, NG described that despite individualised efforts and the offer of significant compromise, many invited stakeholders decided not to come to the meeting and also refused the offer of a dedicated bilateral meeting – it was noted there could be a variety of reasons for this:
    - "looking back" it appears that such events are not a priority for organisation with stretched resources, short-notice of invitation (less than 3 months),
    - Past experience (of the NEMO project) had been sufficiently positive so that looking for room for improvement seems unnecessary (UK centric view)
    - People who were highly knowledgeable about the specific project had left the organisation.

- The small group however brought the benefit of a lively, very open discussion with active engagement of all participants – external stakeholders confirmed they acknowledged and supported the purpose of this meeting; future engagement of National Grid with these stakeholders may benefit from the positive personal experience.

Meeting

- The BESTGRID project was introduced and a number of presentations introduced to set the context of discussion. The presentations can be found on the BESTGRID - National Grid Work Package 6 website.

b Main results of discussion

Stakeholder mapping

- There may always be stakeholders which are not obvious or registered publicly – make every effort to find them, e.g. by asking already identified stakeholders for additional input
- Try to find people in any relevant stakeholder organisation with personal experience (in similar infrastructure developments/in dealing with National Grid)
- Take the time to understand the structure of the stakeholder organisation (is it a body that is nationally centralised, decentralised etc.) to identify the best point in time for engagement
- Consider at what stage an organisation could be reasonably engaged with meaningful information. Its understood this is not always easy or clear.
- Try to understand connections, if any, between stakeholders and which opportunities and threats may be hidden in the relationships.
- Dedicate enough time to keep a "stakeholder matrix" updated – this should include information such as name of organisation, legal role in the process, typical stages in process to engage with, previous experiences with the organisation, contacts at the stakeholder organisation and who dealt with the stakeholder in the past.

Early engagement

- "You can't be too early" is not always true. It needs individual translation for each respective stakeholder
- Enough information should be given to stakeholders to allow for a "self-selection on where to engage",
- This includes information on what is being decided during which phase
    - Which type of organisation typically contributes in a phase and
    - Which information is useful to support the process in each respective phase
- Early engagement is most valuable in securing which data and information needs to be collected that is relevant to all.
- Engagement is too early, if there isn't anything to take from engagement for both sides "you can't consult if you don't have anything to consult with"
- Engagement is too late, if there is already a result on a specific issue and the engagement serves only to present this result

Purposeful Meetings

- Robust stakeholder engagement requires active expectation management
- Purpose of engagement needs to be properly explained (information, consultation…)

- General appreciation of face-to-face contact seems in direct contradiction to the willingness of people to actually take time - clear need to clearly explain the purpose of a meeting – and to give meetings a reasonable purpose
- Many meetings take place between people who are not allowed to take decisions relevant to the purpose of the meeting– leads to frustration for all involved – people need to be empowered to take certain decisions, share certain information or make those available that can - a very solid meeting preparation is required to allow that when the meeting takes place, the decisions that need to be taken can be taken by the people around the table.
- People can get very upset if they feel their expertise is not being properly used and their presence is a waste of time - be open to receive information local stakeholders can provide, check if you think it is contradictory to your own information (example on studies with different results on presence of birds in a certain area). Consider inviting people to most relevant part of meeting for them.
- It is important to properly understand the concerns of the individual stakeholders that may be small in number but have a significant impact on reputation in a community– sometimes it is “easy-to-fix” if only someone had really listened (example of lady that was concerned for her horses during construction and all was needed was a 30min pre-warning so that she could put them into the stable)

Relationship management over longer periods

- Keep in touch, even if it just to say “nothing to report”
- Personal relationships are vital and should be maintained where possible
- Seize existing personal relationships to build upon – as an organisation, systematically keep track of personal relationships, try to learn from the experience, make sure that if a contact person changes, efforts are taken to allow for a “smooth” transition to new contacts
- Have a stakeholder engagement plan, which organisation, which person, on what, how and when – follow it, but also revise it regularly
- Encourage formation of groups where more than one stakeholder group may be represented by a contact person – ideal case have a local “coordination officer” with a good network, expertise, standing and perceived as being sufficiently impartial – not easy to find, but a real plus if available
- Be aware of the situation where very successful liaison management may lead to the perception that spending money on someone in charge of taking care of this may not be necessary – be prepared to explain the benefit and work undertaken.

- If a liaison has gone well – try to transfer learning, e.g. by inviting those with whom liaison has worked well to pass on their experience to the future stakeholder groups a project or company is due to work with.
- Start working together on something small that can over time grow into a relationship that may be strong enough to tackle bigger issues together

Transition of agreements

- Guidance documents on procedures help only to a certain extent – it is easy not to use or refer to guidance – there is a need for contractual agreement and monitoring of implementation; also it is a challenge to pass agreements from development to construction phase (usually the team is a different one and what has been agreed upon may get lost which of course is highly frustrating for stakeholders) – wind farms work with consent managers that try to ensure this does not happen.

Others

- Do not show up in a communities area to undertake work of any kind e.g. surveys or sample taking before making sure the people know you are coming and why.
- The bigger picture: education about electricity markets, drivers, issues; starting from the bigger picture, and from curiosity can help to put projects and developments in contexts and explain wider drivers.

c Lessons learned on meeting format and running

In future

- Structured introduction of bigger picture project.
- Explain agenda clearly and how it will be used
- Regularly summarise findings throughout the meeting
- Collect from each stakeholder the most important insights from the meeting at the end.
- Try to have one person in charge of content side of meeting and one in charge of the logistics (room, equipment, taking notes…)

8. 6. International Mini-Workshop No.2

The second workshop was organised to take place on Nov. 13th 2014, the following day from the public acceptance workshop, to discuss best practice on Speeding Up Permitting while adhering to or surpassing current best practice for Environmental Standards.

a Meeting set-up

Participation

National Grid: Phil Pryor (National Grid BESTGRID Project Manager), Alison Rood (Consents Officer), External: Rachel McCall (Nemo Marine Advisor), Ivan Scrase (Royal Society for the Protection of Birds), Merlin Jackson (Thanet Fisherman Association), Robert Holden (Sandwich Port & Haven Commissioners), Greg Tomlinson (Marine licensing manager MCC, Nemo case officer), Gulietta Holly (Natural England – advisor Nemo), Bob Rumes (MUMM, responsible for coordinating marine spatial planning) Antina Sander (Renewables-Grid-Initiative, BESTGRID project coordinator)

The meeting followed a similar format to day 1 where introductions to the project and background to discussion was presented. Material used in the workshop is included in Appendix 3.

b Main results of discussion

Overall conclusion: Speeding up does not mean investing less time in relevant tasks but wasting less time (=being more efficient).

Defined permitting standards of service typically dictate minimum periods for consultation and decision-making, however they rarely have a maximum time. Thus the key driver is to ensure that delays do not occur rather than attempting to speed up the basic process.

Early planning – pre-project

- Full transparency on project pipeline e.g. stages of the project, timeline for key outputs i.e. constraints, options, governance milestones, regulatory of legislative hurdles/milestones can help authorities in their resource allocation
- European Ten Year Network Development Plan is a starting point but not sufficient as it may not be fully comprehensive
- Project developers do well in actively keeping their authorities informed
- Belgian experience with a formal marine spatial plan is that it provides guidance on corridors but at the same time is reviewed every 5 years. This means that for longer-term projects, a very early consultation with MUMM makes sense to see if there is a way to move out of a corridor over the longer term

Early planning - during project

- Early planning of environmental assessments is very important.
- Belgium: spatial planning phase: cable planned in cable corridors saves time and works for Belgium. In the UK there are concerns this can constrain projects. There are pro's and con's to both approaches, no consensus for all parties, mainly due to incentive regimes.
- The biggest potential to speed up process is providing accurate and comprehensive information in the first instance In the UK the MMO needs to consult their stakeholders every time they get a new version of the EIA. This adds time if there are iterations of information or more information is required.
- Up front research on what is needed early on to save time at later stage; consultation on draft EIA makes sense as afterwards the authority doesn't have to ask for additional data, but this must be done carefully so as not to take excessive resource.
- MMO (UK) expects environmental assessment to not only cover the first 12 nautical miles
- Statutory advisory body like Natural England would be able to provide informal advice if NG presented at an early point in time some alternatives/options; does or could this apply across Europe?
- Challenges arising out of time constraints of competent authority staff and non-availability for working part-time on projects at very early stages.
- It is useful for stakeholders to have a regular exchange with the coordinator of the project to learn about prioritisation and timescales – this allows stakeholders and

permitting authorities to look at this in parallel with other plans and allocate resources accordingly and builds relationships

c Meeting organisation:

Meetings need to be well prepared with clearly defined objectives.

- Instead of an agenda that tries to cover it all, have enough time to go into the details of individual, key, and preferably pre agreed, important points.
- Not too many people around the table - If needed, separate primary and secondary stakeholders to avoid groups getting too big.
- At the end of the meeting, agree on next steps, have action points/minutes, responsible people and disseminate quickly.
- If needed, pay for someone to take notes and minutes - make at the end a joint summary of the actions and responsibilities – mirror this against the meeting objectives to check if the relevant issues have been tackled
- Keep each other informed – this goes both directions – neither should the project developer fail to inform stakeholders involved in the planning and permit granting process or vice versa
- Expectation management on timelines is very important to avoid “nasty surprises” which can lead to friction between different players.
- Particular challenges (different consultants/documents/timeframes), but also key benefits exist in coordinating the onshore with the offshore EIA – consultants should be coordinated and make sure the EIAs are aligned and consistent.

Face to face meetings are very valuable.

- Common recognition that meetings make a big difference but at the same time, due to resource constraints are often difficult to set up; putting a lot of effort in early, face-to-face, well structured and prepared meetings – make the decision for relevant parties to participate easy by explaining clearly why the meeting is needed and what shall be achieved.
- Take time to request feedback on agenda.
- Face-to-face perceived as much more beneficial than telephone conferences
- UK: some authorities need to be able to charge for travel if they shall participate. Does this apply to other EU countries?

d Provide guidance – Authorities/Developers/Stakeholders

- Development phase comes along with a lot of writing – e.g. of assessment documents or in written feedback to consultation and responses – the quality of such documents impacts overall time requirements. At the same time, not all involved in writing such documents are experts in doing so.
- Clear need for guidance documents in key areas, e.g. on how to run environmental impact assessments or appropriate habitats assessments, how to structure a consultation document so that it is workable and can easily be responded to.
- An example of this in the UK is the Habitats Regulations Assessment handbook.

e Cross-project, cross-regional learning

- There is a lot of experience out there – but it easily gets lost.
- Belgium: Nemo project coordinator could have learned a lot from data/practices employed in windfarm development; all data on soil to develop offshore wind becomes property of state and hence accessible – provides very good idea about the seabed, also insights on working conditions in different seasons and which seasons are best.
- Change of staff, people leaving role/staff turnover, information getting lost: Belgium: have evaluator come over to do handover; Natural England has a Renewables Energy Systems (RES) network and cable coordinator who keeps an eye on all projects and responses, MMO involve developer on projects to assist in handover.
- Have a well-structured case file with highlights/issues, a concise, solid summary.
- Set up procedures/regular project/cross project discussions to make sure that contacts and knowledge are being passed on proactively.
- MMO representative describes that they have done mini-secondments with the industry to better understand the mutual processes and resulting requirements.

9. 7. Combined Workshop – Mini & International

a Meeting set-up

Following the first two workshops, which were held on separate themes of Speeding Up permitting and Public Acceptance, it became even clearer that the synergy between the two processes was significant. They cannot really be considered two separate activities in the modern world.

This is evident in current legislation within the EU with the Project of Common Interest (PCI) legislation driving public transparency and consultation as a pre-requisite for inclusion as such a project before a project can access the benefits of maximum permitting timescales.

Thus following collation of the key conclusions and findings of the first two workshops, a single workshop was arranged, over two days, with both stakeholders and permitting authorities to discuss the learning from the first workshops and analysis and how it could be implemented in an action plan on Marine Projects in future, spanning borders as well as within a countries own territorial waters.

Participation

National Grid: Phil Pryor (National Grid BESTGRID Manager), Alison Rood (Consents officer), Phil Armstrong (Corporate Affairs), Angharad Williams (Graduate)

External: Rachel McCall (Nemo Marine Advisor), Ivan Scrase (Royal Society for the Protection of Birds), Sarah Lee (Royal Society for the Protection of Birds) (Merlin Jackson (Thanet Fisherman Association), Jeroen Mentens (Elia Consents Manager), Bob Rumes (MUMM, Belgium), Rotraud Hänlein (Birdlife International)

b Action Plan Implementation

- The key elements for an appropriate action plan to deliver the BEST PRACTICES identified were discussed and the following high-level points identified.

- Action plan needs to be clear about the audience and formatted accordingly.

- Guiding principles for TSO staff.
- Quick guide for general public.
- Quality check for NGO's.

- Stakeholders suggested that they would like a document which would assist in managing a project – so they can identify when stakeholder engagement is not being carried out as outlined or expected. This would need to be on the basis of improved relationships and not driven by political points scoring. Attitude of parties to each other is key.
- TEN E Regulations and PCIs should be referenced.
- Recognise & communicate to stakeholders that from the TSO perspective the governance around a project may need to be improved.

Question Raised:

Will the action plan will need to cater to both TSO & stakeholder (targeted) audience – therefore language and tone needs to be carefully considered?

When smaller stakeholder groups are under resourced they don't have the constraints of large TSOs, they will often fall back to social media due to the large impact this can have. Can the action plan include points like this and how we can deal with these types of stakeholder groups?

Can the action plan educate on stakeholder engagement & mapping – or is this beyond the scope of work package 6?

c Resourcing Challenges for stakeholders

- The discussion touched on difficulties in resourcing and understanding highlighted by Kent Wildlife Trust's inability and lack of interest to become involved in the Best Grid project. Other stakeholders felt it was a shame they could not attend as they felt KWT could have made efficiencies and picked up on learning points through this process based on a review of project outcomes.
- The benefits of engaging earlier are well communicated, before something goes wrong.

- It's important to recognise that in the early stages of communication stakeholders don't want the minutiae details – just on overview for them to assess their on-going resource requirements and need to fully engage.
    - Can TSO's fund (or facilitate) NGO's to spend time working on -project when they are under resourced?
    - Will this open them up to criticism? Need to allow them time to provide justification of accepting this.
    - Needs to be decided/discussed carefully at a high level between both Stakeholder & TSO to be enabled.
- For the efficient management of resources project developers need to carefully consider the meetings that NGO's are invited to . Objectives/purpose should be communicated prior so that NGO can make an educated decision about whether to attend
- This works both ways – NGO's have a responsibility to the TSO's too
- Should have a designated (independent?)Chair.
- Communicate why some stakeholders are not (currently) being consulted
- Set realistic and agreed timescales for stakeholders to deliver on actions assigned to them.
- Actions from TSO meetings with NGO's need to be communicated accurately and in a timely manner
- Often the minutes from meetings have been inaccurate – consider why? Meeting discipline crucial.

d Case Studies

- Case studies would be helpful in the action plan to highlight the importance of certain recommendations; Woman's horse being disturbed by piling – project manager began texting her 30mins before they were due to start work.

e Stakeholder Engagement Lead

- Stakeholder Academy – all parties were interested in NG's commitment to this.
- Is there a role in TSO's for someone to focus solely on the stakeholder engagement of a particular project?

  - Not normally; usually ends up being someone with another role on the project who is not trained for that area, and does not have the required time to devote to it.
  - It should not be the project manager engaging with stakeholders, they have too detailed a view ('Can't see the wood for the trees'). It should be someone working with the project manager.
  - Stakeholder lead is perceived to be a 'nice to have' rather than a necessity.
- What is the cost of paying someone to do these roles versus the cost of dealing with issues created by not having someone to do this? Encourage a holistic assessment of this issue by TSO's for projects considering the 'delivery chain' (Scope, procurement, consultant, engagement?)
- The cost benefit of a stakeholder engagement lead needs to be quantified so we can do a cost benefit analysis. This could be undertaken on a case study basis, both good practice and bad as an example..
- The issues are likely to be common across most projects and have a similar financial impact.
- There is also a significant reputational impact for developers depending on if they manage stakeholders well or poorly. This will impact on how future engagement begins/is received.
- TSO's are often limited by procurement/commercial policies linked to EU Competition drivers in this area – Potential for employees in procurement or finance to receive Stakeholder Academy – (NG Programme) style training and understand the risk to reputation? Can this be managed through education?
- It was noted that Elia also do not have leads for this on projects so it is likely more common across TSO's, certainly at early stages of projects when engagement is best undertaken to develop relationships, build trust and provide maximum ability to influence outcomes.
- A perception that for TSOs a big focus is not needed on stakeholder engagement until construction begins or initial options analysis has been completed (opinions are already 'formed' at this stage in TSO process, it is difficult to remain open) – the biggest focus should be before this stage!
- A cultural analogy could be that it used to be a perception that Health and Safety was a nice to have, now has become part of business as usual – can we make this step change in regards to stakeholder engagement?

- Change in culture around Health and Safety was prompted by government – so is this unlikely?
- Could we have a license condition for stakeholder engagement bearing in mind that conditions on a license need to meet certain criteria e.g. needs to be necessary, proportionate?

- Marine – a very new development area increasing very quickly, so lack of experience of engagement previously.
  - Early experience was that fishermen particularly were engaged with badly, resulting in a negative attitude to future projects.
  - What lessons can be learnt from MMO experiences?
  - What is expected of a developer E.g. one wind farm developer provides a weekly newsletter regardless of progress made – this ensures that the locals feel well informed and up to date.
  - Perception by stakeholders is that it is better to do no stakeholder engagement (particularly very early engagement), until more certainty available in options analysis – this is often the developers approach. – avoiding what is perceived to be unnecessary potential conflict.

f Stakeholder Mapping

- TSO's have a tendency to focus on what the issues are perceived to be, looking at things from an issues perspective rather than the stakeholders.
  - The action plan should capture some guiding principles of how to undertake/record stakeholder mapping. These principles should be agreed following consultation with a range of stakeholders.
  - Groups can take a long time to be identified
  - Often stakeholders are identified remotely
  - Should offer best practice e.g. asking other local groups for advice on stakeholders, or local developers if they have had any problems, separating stakeholders into tiers.
  - Recognise that stakeholders change during lifetime of a project therefore keep stakeholders under review.

g Risk Registers

- Risk registers for a project should consider that some stakeholders might be impacted by more than one project and may respond accordingly?
- Risk registers need to reflect that many permitting issues are often as a result of issues with stakeholders. Risks raised to senior management need to illustrate this to better influence the scope of allowable actions (by TSO) to resolve the issues with stakeholders e.g. focus resource on the source of the issue not just try to fix the symptoms.

h Education between TSOs & NGOs

- Parties can better understand why other parties choose to engage with particular issues if they have experience of both sides of the fence or make the effort to understand. Can we find a way to educate TSO's about the drivers for NGO's and vice versa?
- At times representatives from TSO's cannot/will not answer stakeholders questions. Sometimes this is due to confidentiality but others due to perceived reaction – explaining to the stakeholder why will help to educate them of developer constraints and will also build trust in the relationship.
- Developers should go to NGO's at an early stage to explain what they are doing and how they do it.
- Often TSO's can make NGO's feel they should understand certain things, and so projects & meetings can sometimes proceed without the full understanding of the NGO.
- Recognise that there may also need to be internal education within TSO's and NGO's

i Education between stakeholder groups

- Stakeholders may not realise that they are not actually in conflict with the TSO, but often they are in conflict with another stakeholder group E.g. English Heritage & Natural England, the requirements of one may force a project into an area of interest for the other.
- Should consider bringing all the stakeholder groups together in an annual meeting

- Thanet Fishermen's case study – London Array Windfarm; stakeholders realising that issues they perceived were caused by the project, and thus causing strained relationships, were actually caused by other stakeholder groups, this was eventually identified by liaison personnel and resolved following discussion.
- Revised plans can be communicated in these meetings, main stakeholder groups can then explain their take on it / how it impacts them
- Meetings with local councillors can really help to build understanding regarding the pressures on a project but councillors should not be perceived to express the view of the community or stakeholders or to understand all of the issues.
- Communities may be unaware of what benefits they can get if they work with the developer? E.g. Case study of developer doing an expensive specific survey at the request of fishermen, the outcome of which was a greater understanding for both parties of what could and needed to be done in terms of mitigation and working practices to ensure both parties could proceed with the minimum impact on each other.

j Other Points discussed

- Currently there is no central location to find EIA's and other reports from other projects and therefore benefit from this experience.
- The same surveys are being done repeatedly because developers do not have access to other data.
- Can data for completed projects be made public? – Could stakeholder groups misinterpret this data or misuse it? Could this speed up the process?
- Can a geographic list of EIA's be made available?
- An internal register is being developed within the MMO, the publication date is yet to be confirmed. Could the value of this project be monitored by an organization like RGI?

10. Analysis

The primary objective of the consultations prior to and during the workshops in this work package was to identify issues that could be addressed practically; to consider what solutions to these issues could look like based on experience; to then document the learning and develop an action plan that could be shared across all sectors.

These issues were focussed on

Improving public acceptance though better stakeholder engagement and communication methods.

Delivering more efficient permitting processes in the Marine space.

It is clear from discussions that there are lessons to be learned in the Marine infrastructure space both in the UK and throughout Europe by developers. Some of these lessons cross over into the onshore space.

Key Points to be taken forward to the Action plan are:

NGO's often have resource constraints – Developers should consider how they could help to alleviate this issue without compromise.

Case studies should be referenced in the action plan for illustrating why certain actions are important to undertake.

Guiding principles for stakeholder mapping need to be documented, agreed and suitable guidance prepared.

Face to face engagement is crucial in conjunction with meeting discipline and managing expectations. All of these elements take time and resources but they are very important in delivering key success factors in a project

Stakeholder risks need to be better understood and included in risk registers.

Education is needed between developers and stakeholders/NGO's – currently the most successful relationships appear to arise when the parties have experience of each other already or have staff who have 'sat on both sides of the fence'.

Providing an opportunity to stakeholder groups to discuss the challenges of a project in a structured meeting may help to alleviate some of the pressures on a project, particularly at a strategic or very early development stage.

Currently information on past projects is very difficult to find and we are therefore not benefiting from the learning of those projects.

Need to show how good stakeholder engagement can increase the efficiency of permitting for a project.

11. Appendix 2

a Public Acceptance Questionnaire

Questionnaire

Best Grid Nemo Link Study – Increasing stakeholder acceptance work stream

National Grid: lessons learned for grid development in the marine environment

National Grid is currently working in partnership with 4 of its European counterparts on a project called BestGrid. (Elia – Belgium, Tennet – Germany, 50 Hertz – Germany, Terna – Italy)

Background

Modernisation and expansion of the European electricity grid is necessary in order to facilitate the transition from fossil fuel dependence towards increasing renewable energy generation. The planning and implementation of grid projects can be difficult and time consuming due to the complex planning procedures involved, local opposition and both the desire and need to minimise environmental impacts. Through exploring 4 different European grid connection projects the BestGrid project seeks to find new and innovative ways to develop new approaches that aim to

- **increase the public acceptability of new power lines**
- **speed up permitting procedures**
- **maintain high environmental protection standards**

Through working closely together with Non-Governmental Organisations (NGO's) and exchanging best practice experience National Grid and our European counterparts intend to produce two guidebooks based on practical recommendations drawn from

the 4 projects studied. One guidebook will concentrate on transparency and participation and the other will be on environmental protection. These recommendations can then be implemented more widely across Europe on future grid developments.

UK project

For its project National Grid has chosen to look at the Nemo Link® project specifically whilst also trying to draw on learning experiences from other UK projects. Across the suite of BestGrid projects Nemo Link® is unique in that it is a marine based project (all others are land based) and the necessary permissions have already been obtained.

What is Nemo Link?

Nemo Link® is a High Voltage Direct Current electricity interconnector project between the UK and Belgium. It is a joint project of the Belgian Transmission System Operator, Elia Group and the UK's National Grid Plc, consisting of subsea and underground cables and a converter station in each country, and connects the electricity systems of the two countries.

National Grid has already obtained the necessary permits to develop the scheme, although construction is yet to commence. As our contribution to the Bestgrid project, we are undertaking a retrospective evaluation of the stakeholder engagement in obtaining permission to develop Nemo Link®. The main aim is to determine the extent to which our approaches for stakeholder engagement already implemented in onshore grid development processes are applicable to the marine environment and which components need to be adapted and in what way.

To this end, National Grid will conduct in-house and external expert interviews. Moreover, a series of workshops focusing on environmental protection and permitting processes as well as public participation will be organised with the objective of conducting open and honest debate around the learning and feedback received.

This questionnaire is seeking to document lessons learnt from stakeholder engagement during the development of the Nemo Link® project and identify improvement measures that could be implemented where appropriate in future projects to improve stakeholder engagement and acceptance.

In responding to the questions below we ask you to consider positive and negative events and outcomes and opportunities for improvement focusing on:

- When and how you were engaged with about the Nemo Link® project;
- The quality of the information (e.g. letters, presentations, meetings, EIA scoping document and environmental statement) provided by Nemo Link; and

- Whether you were given sufficient opportunity to input information to the project and influence factors of concern to your organisation.

Your responses will inform workshops we are holding in November and therefore will ultimately contribute to the overall outputs of the BestGrid project.

Question 1: Do you feel the need for the project was fully explained to you?		
Positive events/outcomes	Negative events/outcomes	Opportunities for improvement
Question 2: Do you feel you were consulted early enough in the project development/consenting process?		
Positive events/outcomes	Negative events/outcomes	Opportunities for improvement
Question 3: Were possibilities for engagement into the Nemo Link® project clearly communicated?		
Positive events/outcomes	Negative events/outcomes	Opportunities for improvement
Question 4: Was the project information you received sufficiently clear, concise and transparent to inform your decision making?		
Positive events/outcomes	Negative events/outcomes	Opportunities for

		improvement
Question 5: What methods of engagement/consultation do you find most useful or trust? (i.e. Formal methods – letters, formal EIA and consenting documents, meetings, phonecalls, emails, website)		
Positive events/outcomes	Negative events/outcomes	Opportunities for improvement
Question 6: Were areas of concern to your organisation given sufficient attention?		
Positive events/outcomes	Negative events/outcomes	Opportunities for improvement

Question 7: If you had any current issues in respect of the project how would you contact Nemo Link® now?		
Positive events/outcomes	Negative events/outcomes	Opportunities for improvement

Question 8: Would you like to be kept up to date on the status/outcome of your input into the/a consultation? If so what method would you prefer?		
Positive events/outcomes	Negative events/outcomes	Opportunities for improvement

b Speeding Up Permitting Questionnaire

Questionnaire

Best Grid Nemo Link Study – Speeding up consenting work stream

National Grid: lessons learned for grid development in the marine environment

National Grid is currently working in partnership with 4 of its European counterparts on a project called BestGrid. (Elia – Belgium, Tennet – Germany, 50 Hertz – Germany, Terna – Italy)

Background

Modernisation and expansion of the European electricity grid is necessary in order to facilitate the transition from fossil fuel dependence towards increasing renewable energy generation. The planning and implementation of grid projects can be difficult and time consuming due to the complex planning procedures involved, local opposition and both the desire and need to minimise environmental impacts. Through exploring 4 different European grid connection projects the BestGrid project seeks to find new and innovative ways to develop new approaches that aim to

- increase the public acceptability of new power lines
- speed up permitting procedures
- maintain high environmental protection standards

Through working closely together with Non-Governmental Organisations (NGO's) and exchanging best practice experience National Grid and our European counterparts intend to produce two guidebooks based on practical recommendations drawn from the 4 projects studied. One guidebook will concentrate on transparency and participation and the other will be on environmental protection. These recommendations can then be implemented more widely across Europe on future grid developments.

UK project

For its project National Grid has chosen to look at the Nemo Link® project specifically whilst also trying to draw on learning experiences from other UK projects. Across the suite of BestGrid projects Nemo Link® is unique in that it is a marine based project (all others are land based) and the necessary permissions have already been obtained.

What is Nemo Link®?

Nemo Link® is a High Voltage Direect Current electricity interconnector project between the UK and Belgium. It is a joint project of the Belgian Transmission system Operator, Elia Group and the UK's National Grid Plc, consisting of subsea and underground cables and a converter station in each country, and connects the electricity systems of the two countries.

National Grid has already obtained the necessary permits to develop the scheme, although construction is yet to commence. As our contribution to the BestGrid project, we are undertaking a retrospective evaluation of the stakeholder engagement in obtaining permission to develop Nemo Link®. The main aim is to determine where opportunities for synergies may exist between the approach taken for offshore and onshore stakeholder engagement and consenting

To this end National Grid will conduct in-house and external expert interviews. Moreover, a series of workshops focusing on environmental protection and permitting processes as well as public participation will be organised with the objective of conducting open and honest debate around the learning and feedback received.

This questionnaire is seeking to document lessons learnt from stakeholder engagement and input to the consenting process to identify measures that could speed up consenting processes for future projects.

In responding to the questions below we ask you consider positive and negative events and outcomes and opportunities for improvement focusing on:

- What could have saved time?
- What were the most resource intensive elements of the consenting process?
- Could Nemo Link® have planned their work to resolve issues sooner in the consenting process (e.g. by doing more detailed EIA or more data/evidence gathering or presenting information in a different format)?

Your responses will inform workshops we are holding in November and therefore will ultimately contribute to the overall outputs of the BestGrid project.

Question 1: Have you been a consultee or had experience with any other major infrastructure development? (Y/N) If yes has this helped during this consultation?		
Positive events/outcomes	Negative events/outcomes	Opportunities for improvement

Question 2: Do you feel you were consulted early enough in the project consenting process?		
Positive events/outcomes	Negative events/outcomes	Opportunities for improvement
Question 3: Was the information provided by Nemo Link® to support the consent application of sufficient quality and detail to enable decision making?		
Positive events/outcomes	Negative events/outcomes	Opportunities for improvement
Question 4: Was the EIA presented in a suitable format to enable efficient decision making and input into the consenting process?		
Positive events/outcomes	Negative events/outcomes	Opportunities for improvement

Question 5: Is there anything that Nemo Link® could have provided or done to enable you to provide an informed response in a timely manner during the consenting process? (e.g. meet with stakeholder groups to explain application in detail)
Question 6: From your own perspective and experience what do you feel you/your organisation could do to accelerate response timescales during the consenting process? (e.g. have clear standard operating procedures in place to deal with such applications). Were there any barriers or blockers (e.g. resources, committee cycles etc.)?

=