

**From:** [Outer Dowsing Offshore Wind](#)  
**To:** [REDACTED]  
**Cc:** [REDACTED]; [REDACTED]; [REDACTED]; [Outer Dowsing Offshore Wind](#); [Davies, Emily](#); [Jones, Hefin](#); [Mignano, Kate](#)  
**Subject:** RE: Proposed Meeting: Early Adopters Deliverable  
**Date:** 04 August 2023 13:23:58  
**Attachments:** [REDACTED]

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Dear Beth

You should have received a holding response to your enquiries dated 26 July, below. The PINS team is unavailable today so I'm unable to confirm to myself whether this was sent. For the avoidance of doubt, we wished to confirm that we would respond to your enquiries in writing in the first instance – we can then set up a short follow-up if you have any questions about our written response.

### 1. Engagement with consultees

Your understanding of the pre-application PADSS process is correct. It will be for you as the applicant to distribute the PADSS template to the main consultees and respond to requests which may arise from other consultees to develop a PADSS in a fair and proportionate way. PADSS are consultee authored/ maintained and whilst we would expect applicants to make reasonable efforts to retrieve relevant PADSS to inform pre-application interactions, and ultimately the submitted application, we accept that achieving this will be affected by the responsiveness of the consultees. If you were seeking some other form of advice or clarification in response to this enquiry element, please confirm by response.

### 2. Level of detail required in Design Approach Document (DAD)

Please see the below draft advice concerning the type of evidence that might be included in this document in order to optimise the impact of the DAD on the statutory process.

Please can we emphasise that this is an early iteration of draft advice which is being developed internally at the Inspectorate as a potential resource to inform a future enhanced pre-application service. It is not adopted advice and should not be relied upon in the same way as the Inspectorate's suite of published Advice Notes. For these reasons please do not share this advice outside of your team and outside of the task of preparing a DAD in this trial case.

#### What to include in a Design Approach Document?

Good design is not primarily about how a building or structure looks, although these considerations – the aesthetics – are important. Good design is about the whole process of putting a project together to ensure that as far as possible it achieves the objectives of functioning efficiently and effectively; sits well in the landscape; achieves sustainability, including low-carbon construction, operation and decommissioning; is of pleasing appearance in its context and makes a positive contribution to the life of the community in which it is located. So, the process by which the design is achieved is all important. There needs to be analysis of the project and the location, vision; narrative; a clear statement of design principles: an understanding of why a particular location was selected; an explanation of the design choices that have been made; and a programme of consultation.

The proposal discussed during pre-application and submitted for acceptance will be far from the final product, which may well not be determined until long after a decision on the DCO. So, the question that needs to be asked is whether, at this stage, it is possible to see that the building blocks of a good design are in place or planned and that there is a process secured in the DCO that enables good design to be achieved as the project is constructed, operated and, eventually, decommissioned. Are, for example, the following elements in the applicant's documentation or is there a statement that they will be provided in a timely fashion and is this explained in the DAD?

- **Analysis:** good design starts with an analysis of the proposed location; the technical requirements and challenges of the NSIP technology; and the constraints and opportunities the particular location offers. Much of this analysis is included within an environmental statement as a matter of course – for example, landscape character, key views, heritage assets impacted by the proposal, geology, climate, habitats, biodiversity, water-management and socio-economic factors, including effects on a range of receptors. Often this analysis leads to a necessary focus on how negative effects can be mitigated; but for good design to be the outcome, it needs also to address how positive outcomes can be achieved, particularly the nature, quality and use of the place post construction and how the community might benefit.
- **Vision:** a sense that the proposed development is intentional. That it has a purpose that goes beyond solving a technical problem and aims to address its context, achieve sustainability, create a new place that has identity and purpose and that serves its local community. An explanation of how the local community will benefit from the project will be helpful as part of the vision for the site. Sometimes the project promoter sets out with clear intention to create a building or structure that deliberately changes the perception of what a place is like as was the case of Suffolk County Council in building a new road bridge over Lake Lothing in Lowestoft – see below:
- **Narrative:** successful designs have a clear story of how the design evolved, the factors that were combined into the design process and how, in the future, the development will make a positive difference, particularly in creating a new and distinctive place.
- **Design principles:** there should be an explanation of the design principles that will inform the project; how the National Infrastructure Commission's four design principles have been addressed as part of the design process and how doing so has improved the project.
- **Site selection:** probably the most important 'design' decision in relation to NSIPs, for both 'single point' and 'corridor' developments, is the choice of location of the project. Location will determine to a significant extent, the impact of the project on a wide range of receptors and the extent to which it can be 'integrated' into its environmental and socio-economic contexts. An explanation of why the location was selected is a valuable part of considering whether 'good design' will be achieved.
- **Design choices:** decisions about the appearance of a building or structure – its height, the massing of the building, choice of materials, colour, roof design, landscape, fencing and boundary treatment, for example, are an important component of 'good design' and are often made late in the design process, frequently long after the DCO has been approved. It is important that EXA's are able to make a judgement on how and why these choices will be made, the range of possibilities being considered and the analysis that has been undertaken to inform them - often by undertaking a study of the character and characteristics of the surrounding landscape and the buildings and structures that have been placed within it, including heritage assets – and what the process in making the final decision will be.
- **Community consultation:** there should be a clear programme of how the consultation with the community will be progressed following approval of the DCO, particularly in relation to design matters requiring approval post-consent.

Experience has shown that if the project is ultimately to pass the test of 'good design' the submission considered at acceptance will contain the key 'building blocks' of 'good design' that will be considered further during the examination and, in many instances, completed after approval of the DCO. These should be referenced in the DAD and include:

1. Analysis of the geographical (spatial) context and its character to underpin the decisions made about the project's design. This information is most likely to be found in the **Environmental Statement**, the **Planning Statement** and a **Landscape and Visual Impact Assessment**, which should be presented to the standards set out in the Landscape Institute's publication: *Guidelines for Landscape and Visual Impact Assessment (GLVIA3)*.
2. A vision statement in a **Planning Statement**, **Design and Access Statement** or a **Design Principles Statement** explaining how the various elements of the project have been integrated into a holistic design, how the design has evolved and how the project will add value by positively creating a sense of place. This should be illustrated by an **outline masterplan** that can be incorporated into the development consent order as a certified document during the examination.

3. An explanation in the **Design and Access Statement** and/or **Statement of Design Principles** and the **Outline Landscape and Environmental Management Strategy** of how the possible design solutions have been developed and how they will be implemented including:

- the presentation of a clear process of analysis, including an analysis of the local vernacular and character
- the options, opportunities considered and how and why the preferred solutions were selected
- images and illustrations of the palette of materials (including landscape and planting material) from which the final selection will be made
- an Outline Landscape and Environment Management Strategy
- an explanation of the design principles adopted by the proposal
- the steps that will be taken to create a distinctive place that offers community benefit
- illustrations of precedents and exemplars that have informed the design of the project
- a programme of post-approval community consultation to engage the wider community in design decisions
- a commitment to provide a design guide and/or a design code
- a commitment to a design champion – with appropriate experience and qualifications – and to independent design review, secured in the draft Development Consent Order

The following are some considerations for applicants when seeking to establish whether the requirements relating to 'good design' are met by their project.

Reference No.	Consideration
1. <b>Design Approach Document</b>	<ul style="list-style-type: none"> <li>▪ Does the DAD address:</li> <li>▪ Design process</li> <li>▪ Design principles and</li> <li>▪ Beneficial outcomes</li> </ul>
2 <b>Vision</b>	<ul style="list-style-type: none"> <li>▪ What is your vision for the completed development site(s)/corridor(s)?</li> <li>▪ What is the design vision and where is it set out?</li> <li>▪ Set out your aspirations; ambition and objectives.</li> </ul>
3 <b>Skills</b>	<ul style="list-style-type: none"> <li>▪ What skill sets are being deployed on the design of the project?</li> <li>▪ Are they in-house or employed as consultants?</li> <li>▪ If consultants, how were they procured?</li> </ul>
4 <b>Analysis</b>	<ul style="list-style-type: none"> <li>▪ How has the development site(s)/corridor(s) been analysed to inform a good design approach?</li> <li>▪ What are the main conclusions from this analysis that inform the design at this stage and as it develops?</li> </ul>
5 <b>Response</b>	<ul style="list-style-type: none"> <li>▪ What are the main significant effects of the proposal and how are they addressed to enable good design?</li> </ul>
6 <b>Developing the design</b>	<ul style="list-style-type: none"> <li>▪ Describe the approach to good design and explain how the design has (and will continue) to evolve.</li> <li>▪ What design choices have (and will be) made?</li> <li>▪ What are the emerging design principles?</li> <li>▪ Is there a hierarchical approach to elements of the proposal (for example in designing major and less important bridges in a highways scheme)?</li> <li>▪ Is there a coherent narrative of how the approach to design has evolved?</li> </ul>
7 <b>Delivery</b>	<ul style="list-style-type: none"> <li>▪ How will the final design be delivered? Will there be a design management plan; a design guide; or a design code? If not, why are they not required?</li> <li>▪ Is there a design consultation plan to engage the community following approval of the DCO?</li> </ul>
8 <b>Place</b>	<ul style="list-style-type: none"> <li>▪ How is placemaking being addressed?</li> <li>▪ How will this be a distinctive place and how will the community benefit from it?</li> <li>▪ Describe what the quality of place outcome will be and how it will be secured?</li> </ul>
9 <b>Integration</b>	<ul style="list-style-type: none"> <li>▪ Explain how an integrated, holistic approach to the project's design been achieved?</li> <li>▪ Where is it shown in the documentation (e.g., is there masterplan)?</li> <li>▪ How will this be secured?</li> </ul>
10 <b>NPSs</b>	<ul style="list-style-type: none"> <li>▪ How have the requirements for good design in the relevant NPS(s) been met?</li> </ul>
11 <b>Principles</b>	<ul style="list-style-type: none"> <li>▪ Outline the principles of good design being applied to the project?</li> <li>▪ How will they be developed?</li> <li>▪ How will they be (a) illustrated and (b) secured?</li> </ul>
12 <b>NIC Principles</b>	<ul style="list-style-type: none"> <li>▪ Is there a response to the National Infrastructure Commission's four principles of good design?</li> </ul>

### 3. Policy Compliance Document (PCD)

This appears to be misreferred to as 'Project Compliance Document' in your enquiry, unless you are deliberately referring to a different product? The PCD is not concerned with consultation. A PCD is developed by the applicant to accompany the submitted application, setting out how the requirements of relevant National Policy Statement(s) and other relevant and important policies are satisfied. In s104 cases the focus of the PCD is on the relevant National Policy Statement(s) (NPS) (and emerging drafts), with supplementary evidence for compliance with other relevant national and

local policy. The scope of the PCD is to be consulted upon with relevant consultees during pre-application with regular updates on development to be provided to consultees/ PINS. The expectation is for the applicant to be frank/ upfront in the PCD about policy issues with potential implications for examination.

I hope you find this advice of assistance. Per my opening remarks, please confirm to the team whether you think a short follow-up will be required. Note I am on annual for the duration of wc 7 August. On that basis I have copied my NSIP Reform colleague [@Mignano, Kate](#) in case further urgent assistance is required in my absence.

Kind regards

Rich Price (NSIP Reform Team) on behalf of the Outer Dowsing Offshore Wind Farm Team



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**From:** Beth Travis [REDACTED]  
**Sent:** 26 July 2023 11:37  
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**Cc:** Roisin Alldis [REDACTED]; Chris Jenner [REDACTED]; Greg Tomlinson [REDACTED]  
**Subject:** Proposed Meeting: Early Adopters Deliverable

Good morning,

Following on from our meeting at the start of July, we have used our ETGs to inform those stakeholders initially that we are part of the Early Adopters programme and that as part of this we will be producing some additional documentation in advance of our DCO Application. Should we need to engage any additional non-ETG stakeholders we will follow up with them separately.

We, the Applicant, understand that the PADSS are consultee owned and authored, with Outer Dowsing being responsible for retrieving final versions of the pre-application PADSS from the consultees and combining them into a single PADSS document for submission which will accompany the DCO application.

I believe we would benefit from a follow up meeting with The Inspectorate's Outer Dowsing Project team and any other relevant people to discuss:

1. engagement with consultees
2. the level of detail required in the design approach document which we need to submit,
  - a. We submitted a design principle document at PEIR which we will update for DCO Application.
  - b. It would be helpful for us to understand the requirements for the design approach document, the level of detail required, etc. so we can ensure this is provided
3. the project compliance document. Our understanding is that this would be the consultation compliance checklist but please confirm?

Please can we find a suitable time to discuss the above points so the Outer Dowsing Project team can begin works.

I am conscious our programme is for DCO Application submission to be finalised and ready for submission at the end of this year, which is less than 5 months away so we are keen to ensure the documents are drafted to meet your requirements.

Many thanks,

**Beth Travis MSc PIEMA (she/her)**  
**Consent Co-ordinator**  
**Outer Dowsing Offshore Wind**



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