



Dogger Bank D Wind Farm (EN010144)

Planning Inspectorate comments on the Programme Document (November 2024)

Guidance for what should be included in the Programme Document: [Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects - GOV.UK \(www.gov.uk\)](#)

Pre-App Prospectus link: [Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus - GOV.UK \(www.gov.uk\)](#)

The formal feedback to the Applicant, Doggerbank Offshore Wind Farm Project 4 Projco Limited, provided below includes points previously raised with the Applicant in an earlier project update meeting. The Applicant may wish to review the comments below and make amendments as they consider appropriate.

- The Programme Document has been provided in a low-resolution version potentially intended for external publication, but more detail is required for the use of this document by the Inspectorate and other key stakeholders such as Statutory Consultees and Local Authorities to ensure the greatest value is achieved.
- The Applicant must ensure that the Programme Document is hosted and maintained on the Applicant's website.
- It is not apparent how the Programme Document sets out when the Applicant envisages meetings to be held with the Inspectorate and other key consultees. The purpose of the Programme Document is to enable all those engaged in the pre-application service, particularly statutory consultees, to understand the timescales and to deploy resources effectively to support engagement, as such, the Programme Document should be amended as soon as possible to include this information.
- The Inspectorate and others need this level of detail to provide the most effective service to them. It would therefore be beneficial if the Applicant can be any more specific at this stage on any matters/issues requiring our assistance and when. Linked to this, can the Applicant confirm which specific components of the service offer are being sought from the Inspectorate, as it is not apparent how they wish to achieve the greatest benefit from the use of the service and the associated components.
- It is not entirely clear in the programme document that the Applicant has shared the Programme Document with Local Authorities, Statutory Consultees and Others to date. The Applicant has not indicated whether stakeholders are content with the proposed programme document or the programme in general. The Inspectorate and others could benefit from understanding which stakeholders the Applicant will share the Programme Document with and when they will do so. It could also be beneficial if the Inspectorate and others can clearly identify what, if any, are the points of contention with any relevant



stakeholder. The Programme Document does not appear to make clear how the Applicant propose to mitigate/resolve any points of contention.

- It is not apparent that dates for Draft Document Review by the Inspectorate and other relevant statutory consultees not been included.
- It is not apparent that a list of documents intended for Draft Document Review by the Inspectorate or Statutory Bodies has been provided and it not apparent that any time has been allowed for in the Programme Document for when this review would be expected to take place. Documents should be well developed to make the best use of this review. The Applicant should allow six weeks in their programme to allow the Inspectorate to review the documents and provide feedback.
- It is not apparent that dates for the Adequacy of Consultation Milestone (AOCM) been included. Ideally this would be included around 3 months prior to submission but the more detail which can provided with increased detail on exactly when this workload would be anticipated would be desirable.
- It is not apparent that dates for meetings with the Inspectorate, Evidence Plan meetings and any required multiparty meeting have been included. We and other stakeholders would benefit from additional clear detail to provide the most effective service to the Applicant. It is also not apparent that there is sufficient information included on the multi-party meetings (non-Evidence Plan) component. Up to nine pre-application meetings per year of service can be held which include non-evidence plan multiparty meetings. The Applicant may wish to review and amend their Programme Document as considered appropriate to reflect which components they intend to undertake and provide details of their intended approach.
- It is not entirely clear when time is being allowed for obtaining other consents and permissions. We and other stakeholders would benefit from additional clear detail to provide the most effective service to the Applicant.
- The programme document makes provision for Statutory Consultation in Q2 2025 but does not appear to provide any explicit provision for any targeted consultation should it be necessary. The Applicant may wish to add time into the programme document should it be necessary either when it becomes clear that such consultation may be needed or as a reserve/contingency time for this to happen.
- As it is not apparent what the Applicant is anticipating in terms of timing for Evidence Plan meetings in the Programme Document, it is not possible to determine with any certainty when we would need resources to be available. Therefore, it is very important for the Applicant to ensure we have a minimum of six weeks' notice of these meetings should they be required to participate and provide the best service to the Applicant. The Inspectorate can attend up to eight meetings per year for this component.
- The Programme Document does not currently appear to show any items in the programme for the preparation of an 'Information to Inform Habitats Regulations Assessment Report (HRA)' We and other stakeholders would



benefit from additional clear detail to provide the most effective service to the Applicant.

- The Programme Document shows the offshore ornithology surveys as 'complete Q3 2023', with the Development Consent order (DCO) application submission date planned for Q2 2026. If during discussions with relevant consultation bodies it is determined that there is a need for any additional offshore ornithology surveys (or any additional surveys for other receptors), their timings should be included in any revised version of the Programme Document.
- For participation in the fast-track examination route consultation materials should include notification that they are requesting a shorter examination timetable. It is not apparent in the Programme Document how this would be reflected should the Applicant wish to use this route.
- It is not apparent how the Applicant is intending to approach a number of matters in the indicative programme document. These include information on the draft DCO, preparation of specific application documents (although a time period is given for the preparation of all application documents), details about related non DCO consenting/permitting/licencing processes, details of engagement with statutory consultees, components of the Inspectorate Pre-Application service, issues tracking, Principal Areas of Disagreement Summary Statements, multi-party meetings, evidence plan meeting times and update meetings with the Inspectorate. The Applicant may wish to provide this information in a revised version of the programme document as this information would be beneficial to the Inspectorate and other stakeholders to assist them to provide a high-quality service to the Applicant.
- It is not apparent that there is information included about the approach to the development of the Principal Areas of Disagreement Summary Statements (PADSS) component in the indicative programme document. The Applicant may wish to provide this information in a revised version of the programme document. It would be useful to the Inspectorate and other stakeholders for it to be clear whether PADSS templates have been provided to relevant statutory consultees and who these consultees are. The provision of this level of detail would assist the Inspectorate and possibly others to provide an effective service to you during the Pre-Application stage.
- There does not appear to be information included on the Policy Compliance Document, Design Approach Document, mature outline control documents, Compulsory Acquisition and Temporary Possession evidence, Public Sector Equality Duty supporting evidence components.
- At this stage it is difficult to determine how realistic and robust the programme is with any certainty. Overall deadlines seem realistic and in line with previously experienced practice but there is limited information included about this in the indicative programme document. The Applicant may wish to provide further information in a revised version of the programme document.