

DOGGER BANK D WIND FARM

Preliminary Environmental Information Report

Volume 2

Appendix 18.1 Consultation Responses for
Other Marine Users

Document Reference No: 2.18.1

Date: June 2025

Revision: V1



www.doggerbankd.com

Document Title:	Volume 2, Appendix 18.1 Consultation Responses for Other Marine Users
Document BIM No.	PC6250-RHD-XX-OF-RP-EV-0128
Prepared By:	Royal HaskoningDHV
Prepared For:	Dogger Bank D Offshore Wind Farm

Revision No.	Date	Status / Reason for Issue	Author	Checked By	Approved By
V1	06/05/2025	Final	LA	PT	GA

Table of Contents

18.1 Consultation Responses on Other Marine Users 4

References 12

Acronyms 13

Glossary

Term	Definition
Effect	An effect is the consequence of an impact when considered in combination with the receptor's sensitivity / value / importance, defined in terms of significance.
Environmental Impact Assessment (EIA)	A process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information and includes the publication of an Environmental Statement.
Environmental Statement (ES)	A document reporting the findings of the EIA which describes the measures proposed to mitigate any likely significant effects.
Expert Topic Group (ETG)	A forum for targeted technical engagement with relevant stakeholders through the EPP.
Impact	A change resulting from an activity associated with the Project, defined in terms of magnitude.
Mitigation	Any action or process designed to avoid, prevent, reduce or, if possible, offset potentially significant adverse effects of a development. All mitigation measures adopted by the Project are provided in the Commitments Register.
Scoping Opinion	A written opinion issued by the Planning Inspectorate on behalf of the Secretary of State regarding the scope and level of detail of the information to be provided in the Applicant's Environmental Statement. The Scoping Opinion for the Project was adopted by the Secretary of State on 02 August 2024.
Scoping Report	A request by the Applicant made to the Planning Inspectorate for a Scoping Opinion on behalf of the Secretary of State. The Scoping Report for the Project was submitted to the Secretary of State on 24 June 2024.
Study Areas	A geographical area and / or temporal limit defined for each EIA topic to identify sensitive receptors and assess the relevant likely significant effects.
The Applicant	SSE Renewables and Equinor acting through 'Doggerbank Offshore Wind Farm Project 4 Projco Limited'.
The Project	Dogger Bank D Offshore Wind Farm Project, also referred to as DBD in this PEIR.

18.1 Consultation Responses on Other Marine Users

1. **Volume 1, Chapter 18 Other Marine Users** for the Dogger Bank D Offshore Wind Farm (herein referred to as ‘the Project’ or ‘DBD’) has been informed by consultation with the Planning Inspectorate and stakeholders following the publication of the Scoping Report (Royal HaskoningDHV, 2024) and the comments contained within the Scoping Opinion (Planning Inspectorate, 2024). This appendix contains details of the relevant comments for **Volume 1, Chapter 11 Fish and Shellfish Ecology** and the Applicant’s responses in **Table 18.1-1**.
2. The Applicant previously submitted a Scoping Report in 2023 based on project parameters at that time. The 2024 Scoping Report (Royal HaskoningDHV, 2024) and adopted Scoping Opinion (Planning Inspectorate, 2024) have superseded the 2023 Scoping Report and as such consultation responses on the 2023 Scoping Report are not considered further in this document except where they are included in the 2024 consultee responses and remain relevant to the Project.

Table 18.1-1 Consultation Responses on Other Marine Users

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Paragraph 950 of the Scoping Report proposes to scope this matter out on the basis that, although there will be overlap between the Proposed Development boundary and a number of Practice and Exercise Areas (PEXA), this overlap will be in the offshore ECC and so the movement of vessels within it is not expected to affect any high altitude air combat training activities. However, this is contradictory to the information provided in Scoping Report paragraph 812 within the aviation, radar and military section, which states that “Vessels and personnel engaged in cable installation could interfere with military training activities”. Furthermore, Table 12-1 shows impacts on MoD activities as scoped in for construction and decommissioning which is in contradiction to the information contained within Table 7-38.</p> <p>The Applicant’s proposed approach is unclear and the Inspectorate is therefore not in a position to scope this matter out. The ES should provide an assessment of impacts on MoD activities where significant effects are likely to occur, or information demonstrating agreement with the MoD and the absence of a LSE.</p>	The impact is assessed within Volume 1, Chapter 16 Aviation, Radar and Military . The assessment within that chapter will cover the effects of the Project on PEXAs and military activity and therefore it is not assessed within Volume 1, Chapter 18 Other Marine Users to avoid duplicity.
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Physical impacts on subsea cables and pipelines – operation</p> <p>The Scoping Report proposes to scope out this matter on the basis that if cables require maintenance, standard industry techniques would be followed to ensure that other operators’ cables are not impacted. Limited information has been provided in the Scoping Report regarding the operation and maintenance activities that are to be carried out. As such, the Inspectorate is not in a position to scope this matter out.</p>	Physical impacts on subsea cables and pipelines during the operation phase have been assessed in Section 18.7.2.2 .

APPENDIX 18.1 CONSULTATION REPOSSES FOR OTHER MARINE USERS

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>See comment in Table 2.1 above (Ref 2.1.15), comment read as:</p> <p><i>“The Inspectorate notes that separate Marine Licence application(s) will be made prior to construction for UXO investigation and clearance works, with an accompanying assessment of UXO clearance impacts on relevant receptors. The Scoping Report states that any assessments for UXO clearance in the EIA will be for information only and are not part of the DCO application.</i></p> <p><i>The Inspectorate understands that the number, type and size of UXO devices is not known at this stage and that a detailed UXO survey will be conducted prior to construction.</i></p> <p><i>The Inspectorate advises that the ES should still include a high-level assessment in relevant aspect chapters based on a likely worst-case scenario (any assumptions used in the definition of the worst-case scenario should be explained in the ES). The ES should address any cumulative effects from the construction of the Proposed Development with the likely effects from the UXO clearance.”</i></p>	<p>The potential impacts from UXO is addressed in Volume 1, Chapter 10 Benthic and Intertidal Ecology, Chapter 11 Fish and Shellfish Ecology, and Chapter 12 Marine Mammals of the PEIR. Specific surveys to identify potential locations of UXO will not be undertaken until the DCO is granted. This is to allow more detailed engineering work to be carried out on the offshore ECC and locations of turbines to allow a targeted survey for potential UXO to be undertaken.</p> <p>However, data from the geophysical surveys undertaken will be used to determine the potential for UXO within the offshore development area. As such, the ES will include an assessment of the worst-case number of potential UXO within the offshore development area and how any identified UXO will be disposed of. An outline Unexploded Ordnance Clearance Information and Assessment Plan for reducing the impacts of disposal where possible will be submitted with the ES.</p> <p>A marine licence would be applied for post-consent to allow the investigation and clearance of any UXO to ensure appropriate mitigation is put in place.</p>

APPENDIX 18.1 CONSULTATION REPONSES FOR OTHER MARINE USERS

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Impacts on disposal sites – all phases</p> <p>The Scoping Report proposes to scope this matter out on the premise that the Proposed Development area does not overlap with any active disposal sites and vessel traffic will be covered in the ES Shipping and Navigation chapter. On this basis, the Inspectorate agrees to scope this matter out.</p>	Noted.
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Impacts on aggregate sites – all phases</p> <p>The Scoping Report proposes to scope this matter out on the premise that there is no overlap of aggregate licence areas with the Offshore Scoping Area and any dredger transit conflicts will be covered within the ES Shipping and Navigation chapter. On this basis, the Inspectorate is content to scope this matter out.</p>	Noted.
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Potential interference with oil and gas activities - operation</p> <p>The Scoping Report Proposes to scope this matter out on the basis that the impacts will be assessed in other ES chapters (Shipping and Navigation; and Aviation, Radar and Military). The Inspectorate agrees that this matter can be scoped out of further assessment in the ES Other Marine Users chapter.</p> <p>The ES should provide clear cross-referencing to where the relevant impacts are considered.</p>	Referencing is provided throughout where applicable to the related chapters and inter-relationships is noted in Section 18.10.1 .
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Impacts on Carbon Capture Storage (CCS) sites - operation</p>	This impact has been assessed in Section 18.7.2.3 . The impact on nearby CCS sites are only with the pipelines running to the sites that cross the Project's offshore ECC. The effect significance is assessed as minor adverse.

APPENDIX 18.1 CONSULTATION REPONSES FOR OTHER MARINE USERS

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
		<p>The Scoping Report proposes to scope this matter out on the basis that the effects of permanent structures can be mitigated during the construction phase via consultation with the CCS operators and effects from vessel movements are to be assessed in the ES Shipping and Navigation chapter. Limited information has been provided on the nature of potential effects and mitigation. As such, the Inspectorate is not in a position to scope this matter out.</p> <p>The ES should include an assessment of impacts on CCS sites from permanent structures, where significant effects are likely to occur, or provide evidence demonstrating agreement with relevant consultation bodies that the matter can be scoped out and the absence of LSE. The ES should provide details of any mitigation relied on and how it is secured through the dDCO or other legal mechanism.</p>	
The Planning Inspectorate	Scoping Opinion (01/06/2023)	<p>Impacts on aggregate dredging activities and Disposal Sites – all phases</p> <p>The Scoping Report proposes to scope these matters out on the basis that there is no overlap of aggregate licence areas and Disposal sites with the Offshore Scoping Area, with the closest active sites being 13km and 23km away respectively. On this basis, the Inspectorate is content to scope this matter out.</p>	Noted.
The Planning Inspectorate	Scoping Opinion (01/06/2023)	<p>Impacts of Ministry of Defence (MoD) activities – all phases</p> <p>In the absence of information such as evidence demonstrating clear agreement with the relevant statutory body, the Inspectorate is not in a position to agree to scope these matters from the assessment. The Inspectorate considers that this impact could occur at the construction/ decommissioning stage due to the presence of project ships within Practice and Exercise Areas (PEXA).</p>	The impact is assessed within Volume 1, Chapter 16 Aviation, Radar and Military . The assessment within that chapter will cover the effects of the Project on PEXAs and military activity and therefore it is not assessed within this chapter to avoid duplicity.

APPENDIX 18.1 CONSULTATION REPONSES FOR OTHER MARINE USERS

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (01/06/2023)	<p>Cumulative impacts – all phases</p> <p>The Scoping Report proposes to scope out this matter on the basis that there will be no impact pathway that cannot be appropriately mitigated. Potential cumulative impacts should still be assessed within the ES with the measures envisaged to mitigate them laid out in a subsequent section.</p>	Cumulative impacts are assessed within Section 18.8 with measures to mitigate shown within Section 18.4.3 which highlights the embedded mitigation measures.
The Planning Inspectorate	Scoping Opinion (01/06/2023)	<p>Transboundary impacts – all phases</p> <p>Paragraph 900 of the Scoping Report proposes that this matter is scoped out on the basis that the nearest offshore wind farm is in German waters approximately 90km away and that no international cables or pipelines have been identified which could come into conflict with the Proposed Development. However, paragraph 662 of the Scoping Report identifies the proposed offshore ECC as intersecting subsea cables/ pipelines including the VSLN Northern Europe interconnector telecommunications cable (UK to the Netherlands) and the Langeled gas pipeline (UK to Norway).</p> <p>See comment in Table 2.2 above - the Inspectorate is not in a position to agree to scope this matter out until it has undertaken its own transboundary screening.</p>	<p>Transboundary impacts have been assessed in Section 18.9. The assessment has occurred outside of the Planning Inspectorate's own transboundary screening and can be updated at the next stage of the EIA once that screening exercise has occurred.</p> <p>Responses from Germany and Belgium have been received to date and can be viewed on the Planning Inspectorate website.</p>
The Planning Inspectorate	Scoping Opinion (01/06/2023)	<p>Potential interference with other wind farms - operation</p> <p>The Scoping Report proposes to scope this matter out on the basis that potential impacts during operation are primarily on vessels associated with other wind farms, which are to be assessed in the Shipping and Navigation ES Chapter. The Inspectorate agrees with this approach and as such this matter can be scoped out.</p> <p>The ES should provide clear cross-referencing to where the relevant impacts are considered.</p>	Potential interference with other wind farms during the operational phase of the Project has been assessed in Section 18.7.2.1 .

APPENDIX 18.1 CONSULTATION REPOSSES FOR OTHER MARINE USERS

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (01/06/2023)	<p>Potential interference with oil and gas operations and decommissioning activities - operation</p> <p>The Scoping Report Proposes to scope this matter out on the basis that the impacts will be assessed in other ES chapters (Shipping and Navigation; and Aviation, Radar and Military). The Inspectorate agrees that this matter can be scoped out of further assessment. The ES should provide clear cross-referencing to where the relevant impacts are considered.</p>	Noted.
The Planning Inspectorate	Scoping Opinion (01/06/2023)	<p>Physical impacts on subsea cables and pipelines - operation</p> <p>The Scoping Reports proposes to scope out this matter on the basis that if cables require maintenance, standard industry techniques would be followed to ensure that other operators' cables are not impacted. Limited information has been provided in the Scoping Report regarding the operation and maintenance activities that are to be carried out. As such, the Inspectorate is not in a position to scope this matter out.</p>	Physical impacts on subsea cables and pipelines during the operation phase have been assessed in Section 18.7.2.2 .
The Planning Inspectorate	Scoping Opinion (01/06/2023)	<p>Impacts on Carbon Capture Storage (CCS) sites - operation</p> <p>The Scoping Report proposes to scope this matter out on the basis that the effects of permanent structures can be mitigated during the construction phase via consultation with the CCS operators and effects from vessel movements are to be assessed in the Shipping and Navigation aspect chapter. Limited information has been provided on the nature of potential effects and mitigation. As such, the Inspectorate is not in a position to scope this matter out.</p>	This impact has been assessed in Section 18.7.2.3 . The impact on nearby CCS sites is only with the pipelines running to the site that cross the Project's offshore ECC. The effect significance is assessed as minor adverse.

APPENDIX 18.1 CONSULTATION REPONSES FOR OTHER MARINE USERS

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
		The ES should include an assessment of impacts on CCS sites from permanent structures, where significant effects are likely to occur, or provide evidence demonstrating agreement with relevant consultation bodies that the matter can be scoped out and the absence of LSE. The ES should provide details of any mitigation relied on and how it is secured through the dDCO or other legal mechanism.	

References

Dogger Bank D (2023). EIA Scoping Report. Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010144/EN010144-000011-EN010144%20-%20Scoping%20Report.pdf>

Dogger Bank D (2024). EIA Scoping Report. Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010144/EN010144-000069-EN010144%20-%20Scoping%20Report%20-%20Part%201.pdf>

Planning Inspectorate (2023). Scoping Opinion: Proposed Dogger Bank D Wind Farm. Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010144/EN010144-000018-EN010144%20-%20Scoping%20Opinion.pdf>

Planning Inspectorate (2024). Scoping Opinion: Proposed Dogger Bank D Wind Farm. Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010144/EN010144-000071-EN010144%20-%20Scoping%20Opinion.pdf>

Royal HaskoningDHV (2024). Dogger Bank D Scoping Report (Part 1 & 2). Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010144/EN010144-000069-EN010144%20-%20Scoping%20Report%20-%20Part%201.pdf> & <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010144/EN010144-000070-EN010144%20-%20Scoping%20Report%20-%20Part%202.pdf> [Accessed September 2024].

The Planning Inspectorate (2024). Scoping Opinion adopted by the Secretary of State on 02 August 2024. Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010144/EN010144-000071-EN010144%20-%20Scoping%20Opinion.pdf> [Accessed September 2024].

Acronyms

Acronym	Definition
CCS	Carbon Capture and Storage
ES	Environmental Statement
LSE	Likely Significant Effects
MoD	Ministry of Defence
PEIR	Preliminary Environmental Impact Report
PEXA	Practice and Exercise Area
UK	United Kingdom
UXO	Unexploded Ordnance