

DOGGER BANK D WIND FARM

Preliminary Environmental Information Report

Volume 2

Appendix 31.1 Consultation Responses for Climate
Change

Document Reference No: 2.31.1

Date: June 2025

Revision: V1



www.doggerbankd.com

Document Title:	Volume 2 Appendix 31.1 Consultation Responses for Climate Change
Document BIM No.	PC6250-RHD-XX-PW-RP-EV-0141
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	22/05/2025	Final	IOM / TP	AT	RH

Table of Contents

31.1 Consultation Responses for Climate Change..... 5

References 9

List of Tables..... 10

List of Acronyms 10

Glossary

Term	Definition
Design	All of the decisions that shape a development throughout its design and pre-construction, construction / commissioning, operation and, where relevant, decommissioning phases.
Development Consent Order (DCO)	A consent required under Section 37 of the Planning Act 2008 to authorise the development of a Nationally Significant Infrastructure Project, which is granted by the relevant Secretary of State following an application to the Planning Inspectorate.
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.
Evidence Plan Process (EPP)	A voluntary consultation process with technical stakeholders which includes a Steering Group and Expert Topic Group (ETG) meetings to encourage upfront agreement on the nature, volume and range of supporting evidence required to inform the EIA and HRA process.
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.
Project Design Envelope	A range of design parameters defined where appropriate to enable the identification and assessment of likely significant effects arising from a project's worst-case scenario. The Project Design Envelope incorporates flexibility and addresses uncertainty in the DCO application and will be further refined during the EIA process.

Term	Definition
Scoping Opinion	<p>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.</p> <p>The Scoping Opinion for the Project was adopted by the Secretary of State on 02 August 2024.</p>
Scoping Report	<p>A request by the Applicant made to the Planning Inspectorate for a Scoping Opinion on behalf of the Secretary of State.</p> <p>The Scoping Report for the Project was submitted to the Secretary of State on 24 June 2024.</p>
Study Areas	<p>A geographical area and / or temporal limit defined for each EIA topic to identify sensitive receptors and assess the relevant likely significant effects.</p>
The Applicant	<p>SSE Renewables and Equinor acting through 'Doggerbank Offshore Wind Farm Project 4 Projco Limited'.</p>
The Project	<p>Dogger Bank D Offshore Wind Farm Project, also referred to as DBD in this PEIR.</p>

31.1 Consultation Responses for Climate Change

1. **Volume 1, Chapter 31 Climate Change** 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 31 Climate Change** and the Applicant’s responses in **Table 31.1-1**.
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 31.1-1 Consultation Responses for Climate Change

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Avoided emissions from the Proposed Developments operation – construction and decommissioning</p> <p>Having considered the nature and characteristics of the Proposed Development, the Inspectorate is content to scope this matter out.</p>	Noted. Avoided emissions during construction and decommissioning are scoped out of the greenhouse gas (GHG) assessment as discussed in Section 31.2.2.2 of Volume 1, Chapter 31 Climate Change .
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Greenhouse Gas (GHG) assessment – emissions from operational refurbishment</p> <p>The Scoping Report states that the Proposed Development is unlikely to undergo refurbishment during its operational lifetime. On this basis, the Inspectorate agrees that emissions from the refurbishment of the Proposed Development can be scoped out of the GHG assessment.</p>	Noted. Emissions from operational refurbishment are scoped out of the GHG assessment as discussed in Section 31.2.2.2 of Volume 1, Chapter 31 Climate Change .

APPENDIX 31.1 CONSULTATION REPONSES FOR CLIMATE CHANGE

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>GHG assessment – emissions from operational energy use, water use and other processes</p> <p>The Scoping Report states that the Proposed Development is likely to utilise energy that it has generated, and emissions from the use of water and other operational processes are likely to be negligible. The Inspectorate agrees that emissions from these sources are not likely to be significant. They can therefore be scoped out of the GHG assessment.</p>	Noted. Emissions from operational energy and water use and other operational processes are scoped out of the GHG assessment as discussed in Section 31.2.2.2 of Volume 1, Chapter 31 Climate Change .
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>GHG assessment – emissions from user’s utilisation of infrastructure</p> <p>The Scoping Report states that end users will not directly interact with the project and so user emissions are therefore irrelevant. On this basis, the Inspectorate is content to scope this emission source from the GHG assessment.</p>	Noted. Emissions from users’ utilisation of infrastructure are scoped out of the GHG assessment as discussed in Section 31.2.2.2 of Volume 1, Chapter 31 Climate Change .
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>GHG assessment – cumulative effects</p> <p>Paragraph 1687 of the Scoping Report outlines the global approach to assessment of GHG emissions, seeking to scope out an assessment with other projects in line with Institute of Environmental Management and Assessment (IEMA) guidance. The Inspectorate is in agreement with this approach provided that overall emissions are considered.</p>	<p>Noted. Cumulative effects are scoped out of the GHG assessment as discussed in Section 31.2.3.4 of Volume 1, Chapter 31 Climate Change.</p> <p>The Project’s whole lifecycle emissions (i.e. net emissions released and avoided by the Project during the construction, operation and maintenance and decommissioning phases) are discussed in Section 31.2.5.4 of Volume 1, Chapter 31 Climate Change.</p>

APPENDIX 31.1 CONSULTATION REPONSES FOR CLIMATE CHANGE

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>GHG assessment – transboundary effects</p> <p>Paragraph 1688 of the Scoping Report states that GHG emissions are transboundary by nature and that no additional consideration of transboundary effects is required for the GHG assessment. Table 9-13 of the Scoping Report identifies this matter as scoped in for all phases, which appears to be a typographical error.</p> <p>As noted in Table 2.2 above, the Inspectorate has not yet concluded its separate transboundary re-screening exercise. However, having regard to the nature and characteristics of the Proposed Development, the Inspectorate is content that transboundary effects may be scoped out of the GHG assessment in the Environmental Statement (ES).</p>	There was a typographical error in Table 9-13 of the Scoping Report, and transboundary effects should have been scoped out for all phases with respect to the GHG assessment as discussed in Section 31.2.3.5 of Volume 1, Chapter 31 Climate Change .
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>GHG assessment – approach to assessment</p> <p>Where significance criteria are not explicitly defined within the guidance, the ES should clearly set out where deviation from guidance has occurred and professional judgement has been applied.</p>	Section 31.2.3.3.6 of Volume 1, Chapter 31 Climate Change details the significance criteria used to evaluate effect significance for the GHG assessment.
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Climate Change Resilience (CCR) assessment – mass movements</p> <p>The Inspectorate agrees that climate change is unlikely to exacerbate the risk of mass movements in the UK, this matter can be scoped out of the CCR assessment.</p>	Noted. Mass movements are scoped out from the climate hazards considered in the CCR assessment as discussed in Section 31.3.5.1 of Volume 1, Chapter 31 Climate Change

APPENDIX 31.1 CONSULTATION REPONSES FOR CLIMATE CHANGE

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>CCR assessment – water stress</p> <p>This matter is proposed to be scoped out on the basis that the Proposed Development does not rely heavily on a regular water supply. On this basis, the Inspectorate agrees that this matter can be scoped out of the CCR assessment.</p>	Water stress is scoped out from the climate hazards considered in the CCR assessment as discussed in Section 31.3.5.1 of Volume 1, Chapter 31 Climate Change
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>CCR assessment – transboundary effects</p> <p>Transboundary impacts are proposed to be scoped out of the CCR assessment on the basis that the assessment focuses on the effects of climate change on the project itself.</p> <p>As noted in Table 2.2 above, the Inspectorate has not yet concluded its separate transboundary re-screening exercise. However, the Inspectorate agrees that transboundary effects are not relevant to the CCR assessment, this matter can be scoped out.</p>	Noted. Transboundary effects are scoped out of the CCR assessment as discussed in Section 31.3.3.5 of Volume 1, Chapter 31 Climate Change

References

Royal HaskoningDHV (2024). Dogger Bank D Scoping Report (Part 1 & 2). Available at: <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010144-000069-Dogger%20Bank%20D%20Scoping%20Report%20Part%201.pdf> & <https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010144-000070-Dogger%20Bank%20D%20Scoping%20Report%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://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010144-000071-Dogger%20Bank%20D_Scoping%20Opinion%202017%20EIA%20Regs_draft.pdf [Accessed September 2024].

List of Tables

Table 31.1-1 Consultation Responses for Climate Change	5
--	---

List of Acronyms

Term	Definition
CCR	Climate Change Resilience
DBD	Dogger Bank D
ES	Environmental Statement
GHG	Greenhouse Gas
IEMA	Institute of Environmental Management and Assessment
PEIR	Preliminary Environmental Information Report