

DOGGER BANK D WIND FARM

Preliminary Environmental Information Report

Volume 2

Appendix 28.1 Consultation Responses for Major
Accidents and Disasters

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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.
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.

Term	Definition
	The Scoping Opinion for the Project was adopted by the Secretary of State on 02 August 2024.
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	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.

28.1 Consultation Responses for Major Accidents and Disasters

1. **Volume 1, Chapter 28 Major Accidents and Disasters** 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 28 Major Accidents and Disasters** and the Applicant’s responses in **Table 28.1-1**.
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 28.1-1 Consultation Responses for Major Accidents and Disasters

Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Offshore major accidents and disasters</p> <p>The Scoping Report states that major accidents and disasters associated with the Offshore Scoping Area will be considered in relevant aspect chapters (as set out in paragraph 1725 of the Scoping Report), rather than a separate assessment in the Major Accidents and Disasters Environmental Statement (ES) Chapter.</p> <p>The Inspectorate is content with this approach. The Major Accidents and Disasters ES Chapter should provide clear cross-referencing to where the relevant impacts are considered.</p>	<p>Section 28.1 and Section 28.4.2 of Volume 1, Chapter 28 Major Accidents and Disasters provide clear cross-referencing to where relevant offshore impacts are considered in relation to major accidents and disasters. Additionally, the following offshore topics are also considered:</p> <ul style="list-style-type: none">• Major accidents and disasters associated with vessel collision and allision are within Volume 1, Chapter 15 Shipping and Navigation.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
			<ul style="list-style-type: none"> Major accidents and disasters associated with exposed inter-array and offshore export cables leading to vessel snagging are considered within Volume 1, Chapter 14 Commercial Fisheries and Chapter 15 Shipping and Navigation.
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Impacts during construction including:</p> <ul style="list-style-type: none"> Major accident or disaster impact arising from the ESBI element of the Onshore converter station (OCS) zone upon the Project site, human or ecological receptors; Impact of an incident associated with an existing major accident hazard risk on the ESBI element of the OCS zone; and Impact of natural hazards on the ESBI element of the OCS zone. <p>The Scoping Report states that with mitigation measures included in an Outline Code of Construction Practice, adherence to the Construction Design and Management (CDM) Regulations 2023 and best practice measures, potential environmental consequences associated with major accidents and hazards are likely to be negligible. An assessment of these matters is proposed in relation to the operational phase of the Proposed Development, including commissioning activities.</p> <p>The Inspectorate agrees with this approach and that these matters can be scoped out of further assessment in the ES for construction. However,</p>	<p>As agreed by the Planning Inspectorate, an assessment of the impacts that could occur during the construction phase have been scoped out of Volume 1, Chapter 28 Major Accidents and Disasters. A draft version of the Outline Code of Construction Practice (CoCP) (document reference 8.9) accompanies the PEIR. The CoCP will be developed post-consent in accordance with the Outline CoCP submitted as part of the DCO application (Commitment ID CO39, see Appendix 6.3 Commitments Register). Construction phase impacts have been considered in the following relevant chapters:</p> <ul style="list-style-type: none"> Coastal erosion and flood risk, considered within Volume 1, Chapter 8 Marine Physical Processes, Volume 1 Chapter 21 Water Resources and Flood Risk and Volume 1, Chapter 31 Climate Change. Accidental pollution, covered within Volume 1, Chapter 9 Marine Water and Sediment Quality, Volume 1, Chapter 21 Water Resources and Flood Risk and Volume 1, Chapter 22 Soils and Land Use.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
		identified risks and corresponding mitigation should still be cross referenced within the ES.	<ul style="list-style-type: none"> Aviation safety, considered within Volume 1, Chapter 16 Aviation, Radar and Military.
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Cumulative impacts – construction</p> <p>Table 9-14 of the Scoping Report indicates that cumulative impacts are scoped out for the construction phase. However, paragraph 1745 states that cumulative impacts are scoped in (with no mention of the construction phase), meaning the proposed approach is unclear. The Inspectorate is therefore not in a position to agree that this matter can be scoped out.</p> <p>The ES should assess potential cumulative impacts from risks of major accidents and disasters during construction, or include information to demonstrate agreement with the relevant consultation bodies and the absence of an LSE.</p>	The cumulative impacts of the Project have been assessed in Section 28.8 of Volume 1, Chapter 28 Major Accidents and Disasters.
The Planning Inspectorate	Scoping Opinion (02/08/24)	<p>Transboundary impacts – all phases</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 due to the relatively likely localised nature of any potential effects, this matter can be scoped out of the assessment.</p>	Noted, transboundary impacts have been scoped out across all project phases in Volume 1, Chapter 28 Major Accidents and Disasters,

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Health and Safety Executive	Scoping Opinion (02/08/24)	<p>Will the proposed development fall within any of HSE's consultation distances?</p> <p>According to HSE's records, the proposed onshore project components (Dogger Bank D Offshore Wind Farm, Onshore Export Cable Corridor Area of Search and Onshore Converter Station Zone Area of Search, Drawing No. PC3991-RHD-ON-ZZ-DR-Z-0028, Revision 01 (26/04/2024)) of the proposed development falls within the Consultation Zones of a significant number of major hazards sites and major accident pipelines.</p> <p>If, after the cable routeing and on-shore infrastructure location is better known, the proposed development should encroach on any of these zones, HSE would be able to provide more specific advice with regards to which site the Applicant should make contact with to inform an assessment of whether or not the proposed development is vulnerable to a possible major accident.</p>	<p>The HSE's Planning Advice Web App (accessed February 2025) identified that OCS Zone 4 and OCS Zone 8 overlap two major accident hazard pipelines; National Gas and Ineos Manufacturing. These pipelines have been identified and included in the major accidents and disasters assessment (Section 28.4 and Section 28.7 of Volume 1, Chapter 28 Major Accidents and Disasters).</p> <p>The cable routeing that was presented in the 2024 Scoping Report has since been refined for the Onshore Development Area in the PEIR. Therefore, the Applicant will engage with the HSE regarding any major hazard sites and/ or major accident pipelines located in proximity to the Onshore Development Area. The outcomes of this consultation will inform the mitigation measures included in the ES, where relevant.</p>
Health and Safety Executive	Scoping Opinion (02/08/24)	<p>Will the proposed development fall within any of HSE's consultation distances?</p> <p>Since the works will entail underground cabling and access routes, HSE strongly recommends that at the earliest opportunity, when the cable routing is better known, the Applicant liaises with identified major accident pipeline operators. There are three particular reasons for this:</p>	<p>The Applicant has committed to consulting with relevant stakeholders, including pipeline operators, to manage interfaces and define appropriate control measures as explained within Commitment ID CO105 – see Table 28-4 in Volume 1, Chapter 28 Major Accidents and Disasters.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
		<ul style="list-style-type: none"> The pipeline operator may have a legal interest in developments in the vicinity of the pipeline. This may restrict developments within a certain proximity of the pipeline; The standards to which the pipeline is designed and operated may restrict major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline or its operation, if the development proceeds; To establish the necessary measures required to alter / upgrade the pipeline to appropriate standards. 	
Health and Safety Executive	Scoping Opinion (02/08/24)	<p>Consideration of Risk Assessments</p> <p>Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - Annex G – The Health and Safety Executive. This document includes consideration of risk assessments on page 3</p>	The assessment of major accidents and disasters (Volume 1, Chapter 28 Major Accidents and Disasters) includes an assessment (Section 28.7 and Table 28-16) of the Project's vulnerability to major accidents.

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
Health and Safety Executive	Scoping Opinion (02/08/24)	<p>Explosive sites</p> <p>Explosives Inspectorate is response is no comment to make for Part D, there is an HSE licensed explosives site near the proposed development, but it does not fall into any of the safeguarding zones.</p>	<p>The Applicant understands that when explosives are stored at a location, safeguarding zones are established for different classes of receptor, e.g., inhabited building/ major road, vulnerable building etc., and that the distances vary depending upon the quantity of explosive stored at a location.</p> <p>The Scoping Boundary presented in the 2024 Scoping Report has since been refined for the Onshore Development in the PEIR, and the Applicant will engage with the HSE regarding any major hazard sites and/ or major accident pipelines located in proximity to the Onshore Development Area, including licensed explosive sites.</p>
Northern Gas Networks	Scoping Opinion (02/08/24)	<p>NGN has a number of gas assets in the vicinity of some of the identified “site development” locations. It is a possibility that some of these sites could be recorded as Major Accident Hazard Pipelines (MAHP), whilst other sites could contain High Pressure gas and as such there are Industry recognised restrictions associated to these installations which would effectively preclude close and certain types of development. The regulations now include “Population Density Restrictions” or limits within certain distances of some of our “HP” assets.</p> <p>The gas assets mentioned above form part of the Northern Gas Networks “bulk supply” High Pressure Gas Transmission” system and are registered with the HSE as Major Accident Hazard Pipelines. Any damage</p>	<p>The Applicant has committed to consulting with relevant stakeholders, including pipeline operators, to manage interfaces and define appropriate control measures as explained within Commitment ID CO105 – see Table 28-4 in Volume 1, Chapter 28 Major Accidents and Disasters.</p>

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Stakeholder	Document / Meeting, Date	Comment	How and Where Addressed in the PEIR
		<p>or disruption to these assets is likely to give rise to grave safety, environmental and security of supply issues.</p> <p>NGN would expect you or anyone involved with the site (or any future developer) to take these restrictions into account and apply them as necessary in consultation with ourselves. We would be happy to discuss specific sites further or provide more details at your locations as necessary.</p>	

References

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].

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List of Acronyms

Acronym	Definition
DBD	Dogger Bank D
EIA	Environmental Impact Assessment
ES	Environmental Statement
CoCP	Code of Construction Practice
DCO	Development Consent Order
OCS	Onshore Converter Station
ESBI	Energy Storage and Balancing Infrastructure
CDM	Construction Design and Management
HSE	Health and Safety Executive
NSIP	Nationally Significant Infrastructure Project
MAHP	Major Accident Hazard Pipeline
NGN	Northern Gas Networks
PEIR	Preliminary Environmental Information Report