

KEY INSIGHTS

**THE PROMOTION OF MAJOR
INFRASTRUCTURE:**

DRIVING DCO LEADERSHIP

Welcome to Key Insights - Driving DCO Leadership

What's enabling, or obstructing, the successful delivery of major infrastructure projects through the Development Consent Order (DCO) process today? And what must change over the next five years to unlock faster, more confident decision-making?

These are the questions we put to industry leaders from across the UK's infrastructure and development landscape. Our interviewees spanned government, energy, transport, water, legal, engineering, and construction, each with direct experience of navigating the DCO regime.

In this fourth edition of our KEY INSIGHTS series, we explore the essential elements of DCO Leadership: what it looks like in practice, where it is most needed, and how it shapes the development and promotion of Nationally Significant Infrastructure Projects (NSIPs).

While there is broad consensus that a structured consenting framework is vital for the development of nationally significant infrastructure, too many projects continue to face costly delays, avoidable risk, or procedural failure. Our research reveals that leadership, not just process, is often the decisive factor.

Drawing on in-depth interviews and a targeted roundtable discussion, this report sets out the recurring barriers that project teams face and the leadership behaviours and decisions that consistently deliver better outcomes, for both promoters and communities impacted by these projects.

VIEWS FROM THE TOP

CJ Associates would like to thank the Major Projects Association and its members and other industry leaders who gave their time to share their experiences and insights to create the Key Insights.

Who we talked to:

AECOM

 **ARCADIS**

Ardent

ARUP

 **AtkinsRéalis**


Broadfield

Jacobs

**Luton
Rising**

M M
**MOTT
MACDONALD**

nationalgrid


National Infrastructure
& Service Transformation
Authority


Pinsent Masons

RWE

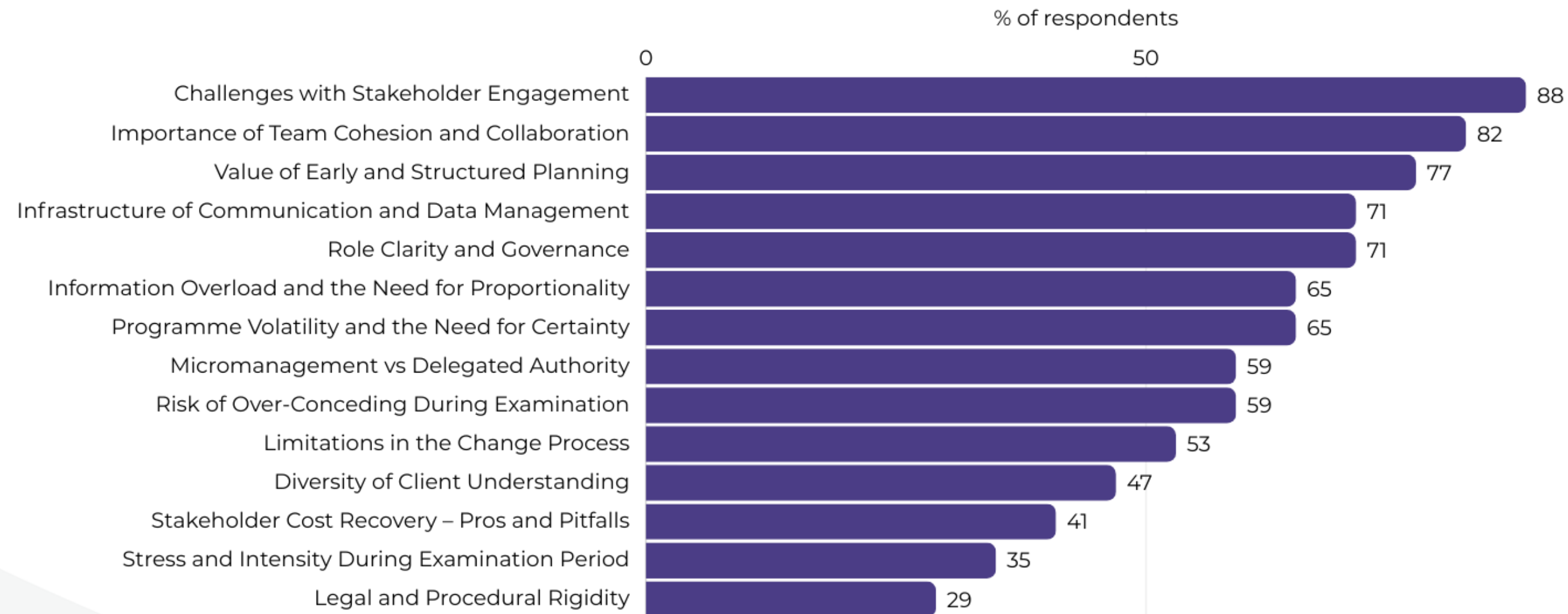

Tideway

WSP

 **Xlinks**

Critical Responses

Our analysis from the interview process shows the key challenges and issues that are impacting on teams delivering DCOs. These items were then discussed at the roundtable, hosted at the Institute of Civil Engineers, and the findings of those discussions are set out in the following chapters of this report.



Legal and Procedural Frameworks

Challenge

The DCO process is governed by strict legal requirements. Many projects struggle to understand the full implications of statutory duties, consultation tests, and procedural rigidity.

Misinterpretation of legal mechanisms (e.g. consultation adequacy) can delay applications or lead to rejection or legal challenge. Proposed relaxations of statutory requirements of the DCO process, in particular around pre-application consultation, should not be interpreted as a 'free ride' for promoters. Indeed, close cooperation between promoters and lawyers will be needed to navigate this change, with consultation and engagement likely to remain vitally important to achieving consent.

Solutions

Early legal integration: Embed legal advisors from the beginning. Their role should go beyond compliance. Legal teams should help shape consultation strategies, document structure, and flexibility mechanisms.

Client-side legal onboarding: Support sponsors and senior leaders with tailored briefings on their legal obligations under the Planning Act, especially on land acquisition, consultation, and compliance.

Legal assurance milestones: Build internal assurance gates for consultation and submission, aligned with legal tests and policy expectations. Use a Consultation Assurance Framework.

Engage PINs on ambiguity: For novel or grey areas (e.g., hybrid consenting strategies), consult the Planning Inspectorate early to clarify approach and reduce legal uncertainty.

CJ Associates Key Insights:

We consistently see that the strongest DCO outcomes stem from projects that treat legal strategy as an active, embedded discipline, not a reactive one. Legal teams should sit at the heart of project development, helping to shape engagement strategy, flexibility mechanisms, and risk controls from day one.

Too often, promoters treat statutory duties as checklists, not as strategic tools. This creates avoidable legal exposure and delays. By aligning consultation, land strategy, and application drafting with clear legal milestones, and engaging confidently with PINs, teams can unlock certainty, reduce challenge risk, and accelerate consent. Our experience shows that legal fluency, when embedded early and consistently, is one of the greatest enablers of DCO delivery.



It's important to bring the legal team along with the project from the start to inform the process while not expecting them to lead and take responsibility for the project delivery.

Neil Chester

Head of Planning, Environmental Assessment & Management
Arcadis

Programme and Project Management

Challenge

DCO projects may suffer from poor programme integration. Misalignment between design, environmental surveys, consultation and legal milestones leads to inefficiencies, duplication, or delay.

Unrealistic timelines or premature launches of statutory consultation can harm credibility and delivery.

Solutions

Programme lead: Appoint a dedicated DCO programme lead with the expertise to deliver cross-functional coordination. This is a critical appointment. They should report regularly to senior leadership and flag risks early.

Integrated programme development: Create a single programme incorporating all Disciplines—planning, design, environmental, legal, engagement, land. Link task sequences and ‘gives and gets’ to key DCO milestones and statutory obligations.

Decision gate discipline: Define internal milestones (e.g., “consultation ready,” “application ready”) with objective criteria. Do not proceed to next stages until quality thresholds are met.

Sustain programme post-submission: Keep the programme office in place post-submission to manage the examination, changes, requirements discharge, and interface with construction mobilisation.

CJ Associates Key Insights:

Programme integration is one of the most underestimated levers of DCO success.

We’ve seen first-hand how siloed planning, engagement, and design functions can derail even the best-intentioned strategies. The difference between delay and delivery often lies in the strength of cross-functional coordination. Effective DCO leaders don’t just build a timeline: they lead a live, strategic programme that reflects real-world risks, decision points, and surges in demand. It’s about readiness, not rigid planning.

When programme leads are empowered, and delivery is sequenced against genuine milestones, projects gain credibility, reduce friction, and move forward with confidence. The message is clear: make programme leadership a board-level priority, and the pathway to consent becomes significantly more achievable.



Applicants need to be aware that PINs are looking to them to resolve more and more issues at pre application stage. So while the vast majority of DCOs are determined within 18 months after submission, the pre submission timescales are less easy to predict.

Michael Baker, Development Project Manager
RWE Renewables

Engagement and Consultation

Challenge

Poorly planned or inauthentic engagement undermines trust with stakeholders and the public. If consultation is viewed as procedural box-ticking, it can lead to backlash, legal challenges on adequacy, and reputational damage.

Inconsistent messaging, weak feedback loops, and inaccessible formats alienate communities and diminish a project's legitimacy.

Solutions

Start engagement early and build trust: Begin non-statutory engagement before red lines are drawn. Demonstrate willingness to listen and adapt. Local authorities, communities, and key stakeholders value early influence.

Design with empathy: Tailor methods to affected audiences: face-to-face events, interactive digital tools, translated materials, and accessible formats. Use local knowledge to guide tone and language.

Track engagement coverage: Develop a stakeholder mapping and engagement tracker showing reach, frequency, sentiment, and follow-up. Use this to help demonstrate adequacy and inclusivity at submission.

Feedback integration loop: Establish robust channels for capturing, analysing, and actioning consultation feedback. Report back to stakeholders in "You Said, We Did" formats to build credibility.

CJ Associates Key Insights:

Genuine engagement isn't just good practice, it's critical infrastructure for DCO success. We've worked with project teams where early, open, and well-structured consultation turned potential opposition into informed support. The key is clarity: stakeholders must understand what's being proposed, how their input matters, and what's off the table. When projects embed empathy, transparency, and tailored communication into their strategy, they don't just meet the consultation test, they build long-term credibility.

We know from experience that engagement done well de-risks examination, strengthens the application, and accelerates delivery. This isn't a communications task—it's a leadership function. Put it at the centre of your strategy, and it will pay dividends across every stage of the DCO lifecycle.



Changes and scheme development are always going to happen but honesty during consultation and transparency is important in building trust with stakeholders and reducing risk.

Phil Stride, Formerly Head of Thames Tideway Tunnel

Flexibility and Scheme Evolution

Challenge

Major infrastructure projects evolve over time. If the DCO application is too rigid or lacks appropriate flexibility, the promoter may face significant challenges in making changes post-submission or during implementation. Conversely, excessive flexibility risks legal challenge or rejection.

Solutions

Plan flexibility early: Identify where change is most likely: design refinements, construction methods, access routes. Embed flexibility into the application from the outset, using tested mechanisms like parameter plans, design codes, and Rochdale envelopes.

Engage PINs on flexibility strategy: Discuss flexibility requests with the Planning Inspectorate at the pre-application stage. Seek feedback on whether mechanisms are acceptable and justified.

Limit post-submission change needs: Invest in early scheme maturity to minimise the number of material change requests. Use detailed option appraisals before DCO submission.

Balance ambition and caution: Over-flexible applications risk rejection; overly rigid ones may be unbuildable. The balance lies in defensible parameters tied to good design and mitigation commitments.

CJ Associates Key Insights:

Too often, promoters treat flexibility as something to retrofit. By then, it's usually too late. In our experience, the most successful DCO applications build flexibility in from the outset, underpinned by robust justification and tested mechanisms. Parameter plans, design codes, and clearly defined envelopes give the Examining Authority confidence while preserving the agility needed for real-world delivery. It's a strategic balancing act. Rigid schemes can stall in construction, while vague ones risk refusal.

The solution lies in early thinking, documented rationale, and internal change governance. Flexibility is not about avoiding decisions; it's about planning for complexity. Done right, it de-risks the post-consent phase and keeps the project on track, legally, practically, and politically.



There is often a risk for the Applicant of over-conceding during examination, driven by the heightened risk of potential objection or a challenge through Judicial Review. The appropriateness of any solutions or compromises should be robustly considered against the associated risk profile to ensure that what is proposed is the most reasonable outcome for all parties and that 100% agreement is not a requirement.

Tim Pearce, Associate Director
AtkinsRealis

Internal Governance and Decision-Making

Challenge

Delayed or poor-quality decision-making within the promoting organisation can compromise the DCO timeline. Without clear governance, decisions on scheme changes, consultation outcomes, or response submissions become bottlenecks.

Solutions

Establish a clear DCO governance structure: Define roles, decision-making authorities, and escalation paths. Include senior sponsors, planning, legal, engagement, and delivery leads in core governance.

Designate a DCO Sponsor or SRO: Appoint a senior responsible owner who is empowered to make key calls, arbitrate trade-offs, and steer the overall DCO strategy.

Use documented decision logs: Keep a written record of decisions made, rationale, options considered, and who signed off. This improves transparency and supports future examinations or legal defence.

Resource your project management office (PMO): Equip the PMO with strong coordination and reporting tools to support governance with real-time information and early warnings.

CJ Associates Key Insights:

Strong governance is what distinguishes DCOs that deliver from those that drift. We've seen projects falter not because of external obstacles, but due to internal indecision, unclear roles, and poor escalation routes. Effective governance isn't about more meetings, it's about making the right calls at the right time. Clear decision gates, empowered leadership, and joined-up workstreams create momentum and accountability. A well-resourced PMO can turn governance from an admin function into a strategic enabler, giving decision-makers real-time insights and early warnings.

When governance is robust, integrated, and transparent, projects move with clarity and confidence through the consent process. It's not just about managing risk, it's about delivering with intent.



It's important from the start of a project to understand what are the key parameters and overall context of the project. And because the DCO process is a regime, clients do need to understand the importance for their governance structures being "match fit" for the delivery of a DCO.

Robbie Owen, Partner & Parliamentary Agent Head of Planning and Government Affairs
Pinsent Mason

Resourcing and Skills

Challenge

Insufficient or poorly allocated resourcing can jeopardise the entire DCO lifecycle. Under-resourced projects experience delays, substandard documentation, inconsistent messaging, and staff burnout. Critical specialist skills, such as environmental assessment, legal drafting, or stakeholder engagement, are often missing or overstretched, leading to avoidable errors or weak submissions.

Solutions

Invest in DCO literacy across functions: Provide training or briefings for non-specialists, such as engineers or designers, so that their work aligns with DCO requirements. Encourage a shared understanding of examination expectations.

Coordinate with procurement and HR teams: Long lead times for hiring or onboarding suppliers can delay progress. Engage early with internal support functions to reduce bottlenecks.

Enable team integration and communication: Create strong channels between internal and consultant teams. Hold regular cross-discipline meetings and ensure shared access to key documents and plans.

Celebrate success: DCO delivery is a high intensity, highly pressurised work environment. Project teams should take time to celebrate achieving project milestones to strengthen team resolve.

CJ Associates Key Insights:

Resourcing is where many DCOs quietly unravel. We've seen technically sound projects falter simply because they lacked the right expertise at the right moment, or failed to retain knowledge across key phases. The most effective promoters treat resource planning as a strategic activity, not a back-office function. That means mapping capacity and capability early, securing senior buy-in, and building resilient, cross-functional teams. DCOs require more than just availability; they demand fluency, continuity, and integration. Where skills gaps exist, act quickly: bring in targeted support or upskill internally.

When projects invest in team readiness, the result is greater agility, fewer surprises, and a smoother path to consent.



Project delivery teams need to have a blended core team with good DCO experience that can be trusted and that can provide high quality advice.

Charlotte Mitchell, Chief Planning Officer
National Grid Electricity Transmission

Policy and Political Alignment

Challenge

Projects that are misaligned with national, regional, or local policy, or are poorly attuned to the political environment, face challenges at every stage of the DCO process. Lack of policy clarity, failure to demonstrate public benefit, or political opposition can lead to increased scrutiny, delay, and refusal.

Solutions

Anchor the scheme to national policy: Ensure the project is clearly framed within relevant National Policy Statements (NPS), emerging reforms, and government priorities. Demonstrate how the project delivers national strategic outcomes.

Develop a clear public interest case: Go beyond technical compliance. Set out how the project will benefit communities, create jobs, or enable wider environmental or social outcomes.

Plan for scrutiny: Prepare for detailed policy cross-examination during examination. Train spokespeople and ensure policy documents are robust, consistent, and up to date.

Adapt to policy evolution: Monitor legislative and planning reforms. Be ready to pivot strategy or update submissions to reflect changing policy contexts (e.g., biodiversity net gain, net zero, or design codes).

CJ Associates Key Insights:

Policy alignment isn't just about ticking boxes, it's about positioning your project as part of the national agenda. We've seen that the strongest DCO cases are those that make their strategic value crystal clear, using the language of policy makers and the concerns of communities. But alignment alone isn't enough, political awareness is vital.

Projects that monitor sentiment, engage decision-makers early, and adapt to changing policy landscapes build resilience and momentum. Whether it's net zero, levelling up, or energy security, your scheme must clearly demonstrate its public value. When political context is understood and proactively managed, scrutiny becomes opportunity, not threat, and promoters gain the traction needed to move through examination with authority and credibility.



Key stakeholders appear to be increasingly aligned to the Government's drive for infrastructure delivery and developing experienced DCO delivery teams.

Sarah Henderson, Technical Director – Town Planning
Mott MacDonald

ADAPT NOW

Government has made clear that major infrastructure projects are essential to driving national economic growth. Actively seeking new and better ways to deliver these projects, while respecting the priorities and concerns of those affected, must now be an urgent industry-wide priority.

Doing nothing is not an option. As our Key Insights Reports have shown, the solutions are within reach. By changing how we think and talking about infrastructure, and, above all, how we deliver it, we can help shape a more sustainable and prosperous future.

Michael Summerfield

Managing Director

CJ Associates

msummerfield@cjassociates.co.uk

020 7529 4900