

OFFSHORE RENEWABLES JOINT INDUSTRY  
PROGRAMME (ORJIP) FOR OFFSHORE WIND



# Independent review of recommendations and roadmap (D10)

Closing the Loop: Feasibility study to determine a feedback approach for post-consent monitoring to reduce consenting risk in future assessments

September 2025



# ORJIP Offshore Wind

The Offshore Renewables Joint Industry Programme (ORJIP for Offshore Wind) is a collaborative initiative that aims to:

Fund research to improve our understanding of the effects of offshore wind on the marine environment.

Reduce the risk of not getting, or delaying consent for, offshore wind developments.

Reduce the risk of getting consent with conditions that reduce viability of the project.

The programme pools resources from the private sector and public sector bodies to fund projects that provide empirical data to support consenting authorities in evaluating the environmental risk of offshore wind. Projects are prioritised and informed by the ORJIP Advisory Network which includes key stakeholders, including statutory nature conservation bodies, academics, non-governmental organisations and others.

The current stage is a collaboration between the Carbon Trust, EDF Energy Renewables Limited, Ocean Winds UK Limited, Equinor ASA, Ørsted Power (UK Limited, RWE Offshore Wind GmbH, Shell Global Solutions International B.V., SSE Renewables Services (UK Limited, TotalEnergies OneTech, Crown Estate Scotland, Scottish Government (acting through the Offshore Wind Directorate and the Marine Directorate and The Crown Estate Commissioners.

For further information regarding the ORJIP Offshore Wind programme, please refer to the Carbon Trust website, or contact Ivan Savitsky ([ivan.savitsky@carbontrust.com](mailto:ivan.savitsky@carbontrust.com)) and Žilvinas Valantiejus ([zilvinas.valantiejus@carbontrust.com](mailto:zilvinas.valantiejus@carbontrust.com)).

## Acknowledgements

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- Department for Environment, Food and Rural Affairs (Defra)
- Joint Nature Conservation Committee (JNCC)
- Natural England
- NatureScot
- Royal Society for the Protection of Birds (RSPB)
- Scottish Government Marine Directorate

This report was sponsored by the ORJIP Offshore Wind programme. For the avoidance of doubt, this report expresses the independent views of the authors.

## Who we are

Our mission is to accelerate the move to a decarbonised future.

We have been climate pioneers for more than 20 years, partnering with leading businesses, governments and financial institutions globally. From strategic planning and target setting to activation and communication - we are your expert guide to turn your climate ambition into impact.

We are one global network of 400 experts with offices in the UK, the Netherlands, Germany, South Africa, Singapore and Mexico. To date, we have helped set 200+ science-based targets and guided 3,000+ organisations in 70 countries on their route to Net Zero.

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## 1. SEFARI Gateway – Who we are

SEFARI Gateway is Scotland’s Centre of Expertise Knowledge Exchange and Innovation for the Scottish Government’s Environment, Natural Resources and Agriculture Research Portfolio.

We are experts in knowledge exchange, providing bespoke access to the Portfolio’s research, expertise, and analysis to ensure scientific evidence helps inform the health, wealth and wellbeing of Scotland.



SEFARI Gateway provided a previous assessment to the **Closing the Loop – Synthesis of Evidence (D01)** report. The project team responded to this initial feedback, implementing many of our recommendations. We note that adoption of these earlier recommendations has influenced the construction of the “Closing the Loop –Recommendations and Roadmap”.

We have based our current assessment of **Closing the Loop – Recommendations and Roadmap (D05)** on the expectation of the report being read by those familiar but not necessarily expert in the subject area. Notwithstanding this we have considered that the document should, as far as practical for its intended audiences, be as readable as possible without prior knowledge.

## 2. Structure of the Report

2.1. This report has a logical structure, as indicated by the contents page.

2.2. The (inter) relationship between sections was apparent and appropriate.

2.3. As we previously noted (**Closing the Loop – Synthesis of Evidence (D01)** report), the pluralistic approach is a real strength of the project.

2.4. The use of a transparent approach to pathway(s) to impact (detailed in section 2.2 of the report) is welcome.

2.5. The emphasising of key words within text (bolding) is helpful and significantly aids initial scanning of the document by the reader.

2.6. It would be useful to include a lay summery (single page using simplified language) that may assist those unfamiliar to the subject area to more quickly grasp the role of the report. We acknowledge that those not familiar with the subject area are not the focus of this report but nevertheless, accessibility to wider interests may add value.

## 3. Narrative

3.1. The narrative content is complex due to the interrelation of arguments and intended outcomes. These occur within differing timelines for (likely) achievement. The ownership of actions and outcomes is also held across different audiences. This poses a challenge as to how to order and represent the recommendations and routes to enact each. Given this, the authors have done a commendable construct of the narrative.

3.2. Sections are generally well written. Linkages between sections are clear for those with at least a passing knowledge of the subject, though reading the narrative would require more effort for those not versed in the field. Again, we accept that the report is focused to those at least familiar with the topics therein but would urge a further check for opportunities to simplify language.

3.3. While hyperlinks can create problems as to accessibility by all readers and noting some use of hyperlinks in the document already, we do continue to recommend they are used to enable access to reports, papers, policies and directives so as to encourage scrutiny of the literature used.

3.4. The report is text heavy. Though not necessarily adding to content, a single read through of the document is not easy. The use of imagery to break the text may help the reader's focus on specific sections and more generally help to reduce reader fatigue.

3.5. Some further use of bullet pointing may emphasise key aims or outcomes that are contained within larger blocks of text e.g. page 7

*“the UK administrations vary in the amount of PCM monitoring data that have been collected; with England having quite a lot of PCM data available, Scotland having much less, and Wales not having collected any at the present time. -NEW PARAGRAPH*

*There are opportunities to improve the current process and make recommendations for future changes so that PCM can: (bullet point key messages)*

- *fulfil its potential of helping to reduce uncertainty in consenting risk in the context of both cumulative and future project-based assessments,*
- *inform adaptive management,*
- *set up a formal feedback mechanism so that valuable learnings from post-consent monitoring can be fed directly back into the system.*

*Recognising that collecting PCM data is timely and expensive and so .....”.*

3.6. There are some minor typographical errors e.g. page 30 “was to develop and demonstrate an a swift.....,” that will be corrected by further read through.

## 4. Executive Summary

4.1. The executive summary should be succinct and able to act as a stand-alone document. Accordingly, the authors have created a single page document focused to outcomes. This is, from an immediacy of attention grabbing, very useful. Nevertheless given the interrelated nature of the recommendations, the differing ownership of outcome, the timelines and ease or otherwise of achieving outcomes, an executive summary will always face challenges to its brevity.

Accordingly, if the Executive Summary is removed from the report a few questions arise as to what is being assessed: e.g. post consent but consent for what? A slightly expanded opening sentence to identify the focus of the report would improve stand-alone clarity. This may be achieved by simple addition to opening sentences eg.

*“For the expanding offshore renewable sector” (a key component for UK energy and the UK’s transition towards net zero greenhouse gas emissions), there is currently no .....*

4.2. The recommendations are mostly clear. However, the owner of the recommendation is not discernible. Though stating this in full would overly complicate the summary, the authors should consider expansion of opening paragraph to indicate who the main actors are and if able to do so succinctly, how their roles might segregate?

4.3. The road map is an important guide to the project. A “quick-link” from the executive summary to the road map may be useful.

## 5. Conclusions

5.1. The narrative is well argued. Whether it is a conclusion per se is debatable. It provides context to recommendations which are, in our opinion appropriately presented in the early stages of the report. however, as a conclusion, it would be useful to provide a short paragraph that summarises the key facets of the recommendations and which then draws the reader back to the recommendations.

5.2. It is noted that there was “low support for using legislative tools, such as statutory instruments from the Energy Act (2023), as a mechanism to force the improved use of PCM data.” In general, there was feedback that collaborative working [snip] was preferential .....”. It should be noted that voluntary collaborative working and networks are highly vulnerable to financing, individual and organisational time, capacity and priorities of each within a network. These issues are addressed through the report (e.g. 3.9.3). However, where there is no single owner or definitive “lead”, this vulnerability magnifies as prioritisation may drift between organisations. As a suggestion, despite stakeholder preference and while noting the issues raised by experiences in Germany, should legislation be noted as a potential? Has this been too decreased in prominence?

## 6. Tables and roadmap

6.1. The authors of the report, as noted above, face a challenge of presenting findings and recommendations by priority, achievability, (organisational) roles and interdependencies. In our opinion, the tables do capture this and navigate that complexity.

6.2. In tables that identify roles and responsibilities, to aid clarity, the differing categories should start on a separate line within the specific “box”.

e.g. “**Regulators, SNCBs:** oversight, **industry:** coordination & monitoring, **researchers:** input into methodologies” becomes

**“Regulators, SNCBs:** oversight,

**Industry:** coordination & monitoring,

**Researchers:** input into methodologies”

6.3. The final line of the Road Map (I and J) is potentially confusing. Is this meant to show the progress to achieving a strategic approach and then the cut off into evidence bridging to exploit that strategic approach?

6.4. A legend to the Road Map may be helpful to orientate the reader as to the principles discussed in the report and now incorporated into the roadmap.

## 7. Other Comments

The report uses some visuals but remains intensely text heavy. Images of offshore energy facility and/or of species targeted in assessment, while not adding specific informative value do break up the text and

can reduce reader fatigue. It is a difficult decision as images should add information. Here, it is doubtful if they would do so but their benefit may be to increasing the ease of reading. For example, a relevant image for case studies might help identify to the reader that they are in a specific case study.



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**+44 (0) 20 7170 7000**

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