



THE PLANNING ACT 2008

THE INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES

2010

**Appendix D to the Relevant Representations of Natural England**

**Ornithology Compensation Case**

For:

The construction and operation of the Five Estuaries Offshore Wind Farm located approximately 57km from the Essex Coast in the Southern North Sea.

Planning Inspectorate Reference EN010115

13 August 2024

## Appendix D – Compensation Case

In formulating these comments, the following documents have been considered:

- [APP-049] 5.5.3 Lesser Black Backed Gull Compensation - Evidence, Site Selection and Roadmap
- [APP-050] 5.5.4 Kittiwake - Evidence, Site Selection and Roadmap
- [APP-051] 5.5.5 Guillemot and Razorbill - Evidence, Site Selection and Roadmap
- [APP-052] 5.5.6 Lesser Black Backed Gull Implementation and Monitoring Plans
- [APP-053] 5.5.7 Kittiwake Implementation and Monitoring Plans
- [APP-054] 5.5.8 Guillemot and Razorbill Implementation and Monitoring Plans
- [APP-055] 5.5.9 Lesser Black Backed Gull Compensation Site Suitability Report
- [APP-057] 5.5.11 Compensation Longlist and Shortlist

### 1. Introduction

1.1 As the derogations material differs in content/structure to a standard Environmental Statement chapter, our comments are provided in a different format to the other Appendices. Within this Appendix we provide our current position on our confidence in each proposed compensation measure, followed by key consenting concerns on the compensation plans and supporting documents. For clarity, we have also provided a summary RAG table for each measure alongside our position to highlight areas of agreement and outstanding concern. We have used the following criteria to assess each category in the summaries:

	NE has broad confidence in this aspect of the measure, though there may be some uncertainties that need addressing.
	There are significant concerns/uncertainties regarding this aspect of the measure, but they have the potential to be resolvable.
	Major uncertainties remain with this aspect of the measure, which if not resolved would make compensation undeliverable. NE cannot be confident at this stage that the measure is deliverable.

#### 1.2 Natural England compensatory measures 'check list'

To assist developers and regulators, Natural England has developed a checklist of aspects that need to be described in detail in compensation submissions, to give confidence that the measures can be secured (see Annex D1). This checklist forms the basis of the summary table criteria.

## 2. Natural England’s Advice and Recommendations

### 2.1 Flamborough and Filey Coast Special Protection Area (FFC SPA) Guillemot and Razorbill Disturbance - Mitigation at colonies in the southwest of England.

2.1.1 The populations of guillemot and razorbill at FFC SPA are well-managed and therefore there is limited scope for compensation measure provision in the area. Consequently, the Applicant has focussed on providing compensation at guillemot and razorbill colonies in the southwest of England. The compensation site longlist selection process identified sites in the southwest of England in proximity to built-up areas or experiencing high levels of tourism and coastal recreational activities (i.e. recreational disturbance) which are not subject to targeted management. Following discussions with Natural England, the Applicant has considered measures such as the use of signage, visitor access statements, and coordination with water-based recreational/equipment hire organisations, to reduce disturbance to these southwest colonies.

2.1.2 Natural England consider the proposed measures to be technically feasible. However, at this stage there is limited evidence on site-specific issues and therefore the scope and practicability of management response. We advise that significant on-site monitoring will be required to establish current levels of disturbance (impact) to the colonies, as well as engagement to secure landowners and/or stakeholder cooperation. This means there is uncertainty regarding securing of relevant measures of the longlisted locations. Other measures e.g. wardening may be more appropriate depending on the findings of monitoring.

2.1.3 A second option being explored by the Applicant, is strategic compensation through participation in Defra’s Marine Recovery Fund (MRF). Whilst this may become an appropriate option in the future, at present there is uncertainty with this measure regarding implementation timescales and the level of contribution made by the Applicant.

**Table 1: Summary position of compensation measure - FFC SPA Guillemot and Razorbill**

<b>Compensation measure: FFC SPA Guillemot and Razorbill – disturbance mitigation at southwest (SW) colonies</b>			
	<b>NE Ref</b>	<b>RAG</b>	<b>NE Comments</b>
<b>Overall confidence in the measure</b>	D1		Natural England consider this measure to be technically feasible. Candidate locations have been identified but are not yet secured. Impact levels are not yet agreed, though are expected to be low. The Applicant needs to monitor sites to establish the current level of disturbance, and identify the measures needed to effectively mitigate it.

Theoretical merit to deliver compensation	D2		<p>We are broadly supportive of the proposal to provide compensation for impacts on guillemot and razorbill through reduction of disturbance at small colonies in south-west England. However, although disturbance represents a general threat to guillemot and razorbill breeding success, the nature and severity of any impact is likely to vary significantly between individual colonies. We emphasise that it will require significant amounts of on-site monitoring and engagement with local experts to establish a baseline for the current level of disturbance and potential impact on colony productivity at any given site, and to establish what measures might effectively mitigate any disturbance occurring. This may include options beyond those identified e.g. wardening. We urge the applicant to update the Examination on any work carried out during the 2024 breeding season.</p> <p>Connectivity to the FFC SPA and the wider UK network of SPAs classified for guillemot is likely limited, although populations of both species from the south-west colonies may mix with birds from other SPAs in the non-breeding season, resulting in some potential for exchange. This would be of greater concern for a project with greater impacts on FFC SPA auks than Five Estuaries, but given the likely modest contribution made to the in-combination impacts, the likelihood of low connectivity does not mean a proportionate contribution of auks to the network cannot be made in this specific instance.</p>
Technical feasibility	D3		<p>Natural England consider the measure to be technically feasible. However, the Applicant has not yet demonstrated whether sites can be easily observed or monitored in sufficient detail to establish annual counts and productivity estimates which can serve as a baseline for management interventions. Communication with landowners and stakeholders is still ongoing and it remains unclear how many sites will be able to participate. The proposal would also benefit from working alongside recreational stakeholders and the local authority.</p> <p>More research or investigation is required to establish the disturbance distance thresholds. This might be obtained by searching grey literature (e.g. a Plymouth University MSc project that recommended a minimum approach distance to guillemot colonies at Berry Head of 100m for boats and 200m for kayak users).</p> <p>We broadly agree with the monitoring approach, however, we emphasise that it is important that as much time as possible is spent observing the colonies to record disturbance events and their consequences, and to gather as much data as possible on direct causes of nest failure.</p> <p>For these cliff-nesting species, disturbance is most likely to come from recreational activities on the sea rather than from the cliff tops. It is certainly plausible that watercraft pose a significant disturbance risk to auk colonies in the southwest. For the purposes of compensation, it is essential that the</p>

			<p>amount of disturbance each colony is subjected to is monitored for an appropriate period of time in order to assess the likelihood that this is a factor affecting the success of that particular colony and to inform the scope of management.</p> <p>Investigating the most suitable set-back distances for watercraft will ensure local signage and codes of conduct convey the most appropriate evidence-based information to help bring about a behavioural change in the community.</p>
Agreed compensation level	D4		Impact levels are not yet agreed but are expected to result in a modest contribution to the in-combination total. For previous auk compensation cases Natural England has advised the use of 70% displacement and 2% mortality for establishing requirements, and repeat this advice here.
Scale/extent of measure	D5		Reducing disturbance across multiple small colonies has the potential to adequately raise breeding numbers/productivity to deliver the required level of compensation, once impact levels and an appropriate ratio are agreed.
Timing: Deliverable before impact	D6		<p>Two years of monitoring are planned to establish baseline data, though we recommend this period should also be used to investigate suitable set-back distances for approaching water-borne vessels. This will help ensure appropriate signs and codes of conduct are in place well in advance of the operational phase of the OWF project.</p> <p>It is not clear whether the proposed management measures are intended to be in place three or four breeding seasons in advance of the impact occurring. We seek clarification on the proposed timetable and advise that the proposed implementation date will need to be secured in the DCO schedule.</p>
Location of measure	D7		Candidate locations have been identified but are not yet secured, though negotiations are under way. Without secured agreement with the relevant landowners and stakeholder willingness to participate, there remains the risk that the project will not deliver.
Long term implementation	D8		<p>Monitoring will be required for all stages of the proposed management programme. Stakeholder engagement will also need to be upheld throughout the project to ensure all new participants are aware of the issues. Again, we emphasise that it is important that as much time as possible is spent observing the colonies to record the number of disturbance events the colonies are subject to, and their consequences, which is needed to identify suitable set-back distances and also to gather as much data as possible on the direct causes of nest failure. This will require the seasonal employment of a suitably skilled observer(s) for the project's duration.</p> <p>Adaptive management options are available, include raising more awareness through public and stakeholder engagement, additional signage, wardening if that is not already part of the proposal etc.</p>
Success criteria/Ability to prove additionality	D9		Success criteria have been established. However, establishing a robust and committed program of annual monitoring will be essential to identify trends accurately – see comments above.

Suitable as sole measure for target species	D10		<p>The proposal has potential as a sole measure given the likely scale of impact. The proposal would also benefit from the Applicant working alongside recreational stakeholders and the local authority to achieve this. We also recommend, as a minimum, using signage in conjunction with public engagement to help deliver an effective code of conduct.</p> <p>We note and support the option of a collaborative approach between multiple developers to delivering compensation at south-west auk colonies, which could provide flexibility as well as efficiency.</p>
Key Uncertainties	D11		<ul style="list-style-type: none"> <li>• Site specific evidence gathering has been largely desk-based and anecdotal to date, leaving some uncertainty about the need for and relevance of the proposed management measures at the candidate locations.</li> <li>• Landowner and stakeholder participation has not yet been secured and needs a high level of commitment and perhaps changes in working practice to enable success.</li> <li>• Access to sites for monitoring has not been fully assessed and may be difficult to do from the shore alone.</li> <li>• Key parameters such as colony counts and breeding success that can be used to measure success may be difficult to record accurately.</li> <li>• Adaptive management will not be adopted should other pressures such as impacts associated with climate change (e.g. extreme weather events) negatively impact the compensation delivery. However, adaptive management could be crucial to help restore and build resilience in the local auk population in the face of change.</li> </ul>

## 2.2 Flamborough and Filey Coast Special Protection Area (FFC SPA) Kittiwake – Artificial Nesting Structure (ANS)

2.2.1 The Applicant considers the provision of artificial nesting structures (ANSs) to be the most feasible measure for providing compensation of kittiwake, in addition the Applicant is looking at the option of participating in the MRF. The Applicant is seeking a formal agreement with Dogger Bank South (DBS) Offshore Wind Farm (OWF) to have a share of the kittiwake tower at Gateshead. We agree in principle with the proposed approach, although the nature of the collaboration with DBS is unclear, as is how the allocation of the measures to Five Estuaries will occur. Furthermore, it is also possible that the Gateshead Tower is too sparsely populated to compensate for losses attributed to any of the contributing projects. Therefore, advise that it is appropriate to continue with both compensation options, to safeguard delivery of the compensation.

**Table 2: Summary position of compensation measure – FFC SPA Kittiwake**

<b>Compensation measure: FFC SPA Kittiwake – Artificial Nesting Structure (ANS)</b>			
	<b>NE Ref</b>	<b>RAG</b>	<b>NE Comment</b>
<b>Overall confidence in the measure</b>	D12		The ANS measure is a technically feasible compensatory measure for kittiwake. There is uncertainty regarding collaboration and agreement between VE and Dogger Bank South (DBS) OWF with regards to sharing the ANS. Further uncertainty exists as to whether sufficient numbers of birds (a) will occupy the RWE ANS and (b) depending on how the measure is allocated, whether sufficient birds can be allocated to VE.
Theoretical merit to deliver compensation	D13		Should the SoS deem that kittiwake compensation is required for VE, Natural England agrees with the Applicant's proposal to progress two options: (a) the Dogger Bank South (DBS) kittiwake tower (ANS) or (b) participation in the Defra strategic compensation/MRF. However, this agreement is subject to a detailed account being provided of the collaboration sought with DBS, and greater detail regarding how VE's contribution will be secured.  It is also unclear how the number of any kittiwake pairs occupying the ANS will be divided/shared between the participating projects – if that is the intention. The nature of the arrangement could, therefore, impinge on the ability of VE to contribute its compensation before the windfarm becomes operational.
Technical feasibility	D14		The measure is technically feasible. No further comment required.
Agreed compensation level	D15		The approach matches that used by Hornsea Three OWF and was agreed by Natural England. The compensation requirement has been derived based on the mean number of mortalities predicted by the collision risk analyses. However, Natural England advise that the compensation requirement should be scaled up to the 95% UCI and not be based on the central impact value.
Scale/extent of measure	D16		The scale/extent of the measure has the potential to be proportionate to the predicted losses.
Timing: Deliverable before impact	D17		The Gateshead tower is already constructed and so the lead-in time for installation is not an issue. The outstanding issue regarding timing is how the structure will be shared across the developers, and whether this has implications for VE's share of the benefits arising before its impacts occur.
Location of measure	D18		Natural England's general advice to developers is that ANS should be located offshore. This reflects the likelihood that suitable nesting space is only an issue along parts of the English North Sea coastline, and the existing/planned

			<p>provision of ANS in such areas by other developers requiring compensation. Whereas offshore there is likely to be both a shortage of long-term suitable nesting locations, and also the opportunity for colonising birds to forage in waters underutilised by coastal-nesting kittiwake.</p> <p>However, for projects with small impacts such as Five Estuaries, we consider it proportionate to consider onshore provision, particularly where the provision would be part of a larger structure. In that context, the location of the ANS at Gateshead is suitable for addressing the impacts of Five Estuaries. It is reasonable to conclude that the ANS here has the potential to contribute sufficient birds to the biogeographic population to address the impacts of Five Estuaries.</p>
Long term implementation	D19		<p>A clear plan for the delivery of this measure has been established. Monitoring and adaptive management are included in the proposal. The Applicant will not commit to adaptive measure if the evidence suggests that the reason for lack of success is beyond the Project's control (e.g. climate change, prey availability), however, these could remain beneficial to help build resilience in the declining kittiwake population e.g. if heating becomes an issue, additional shading for ledges could be provided.</p>
Success criteria/Ability to prove additionality	D20		<p>Success criteria/ability to provide additionality have been established.</p>
Suitable as sole measure for target species	D21		<p>This remains dependent on the outcome of negotiations with DBS, how the measure is allocated across projects and whether adequate numbers of birds occupy the DBS ANS in a timely manner. To safeguard delivery of the compensation, the alternative option to support Defra's Marine Recovery Fund for an offshore ANS should be retained in the meantime.</p>
<b>Key uncertainties</b>			
	D22		<ul style="list-style-type: none"> <li>• The birds do not occupy the DBS kittiwake tower in sufficient numbers to adequately compensate losses incurred by not only DBS, but also VE (and any other contributing project).</li> <li>• Negotiations with DBS fail or prevent VE from allocating breeding pairs to its compensation quota in a timely manner.</li> </ul>



## 2.3 Alde Ore Estuary Special Protection Area (AOE SPA) Lesser Black Backed Gull (LBBG) – habitat creation/predator management

2.3.1 Predator management and habitat creation were identified as the most feasible compensation options for LBBG. Two potential sites for compensation delivery have been selected: VE02 on Orford Ness and Outer Trial Bank in the Wash. Site VE02 was selected for installation of a predator exclusion fence due to its accessibility, no requirement for water level management, connectivity to roof nesting LBBGs and proximity to the Norfolk Projects compensation site.

2.3.2 Outer Trial Bank is an artificial island created as part of a water resources scheme in the Wash. It is situated 126km from AOE SPA and within the mean-maximum foraging range for LBBG. On the island there are breeding colonies of LBBG and herring gull. Populations of both species have been reported to be declining. The presence of rats on the island are likely to be a contributing factor to decline of the LBBG population through predation, though this remains to be confirmed. As well as predator management, vegetation control is being considered.

2.3.3 In principle, Natural England agrees that the combination of measures proposed by the Applicant could deliver adequate compensation, subject to agreement on the impact levels and compensation targets, and appropriate permissions being secured. The proposed conservation actions being sought within the AOE SPA have the clear benefit of delivering compensation ‘in situ’, subject to potential impacts on the other designated sites at the location being managed down to acceptable levels; however, we also agree that measures to improve habitat on the Outer Trial Bank site could also deliver compensation and are less reliant on gulls colonising a specific location.

2.3.4 Hence, we feel that there are two complementary approaches to the compensatory measures proposed: the AOE SPA measure has the potential to directly repair the impacts on the designated site, but to some extent will be ‘in competition’ with other compensatory measures, whereas the Outer Trial Bank measure, whilst not directly benefitting the SPA, could restore a regionally important colony and, in turn, build more resilience for the wider network of coastal nesting LBBG in East Anglia.

**Table 3: Summary position of compensation measure – AOE SPA LBBG**

<b>Compensation measure: AOE SPA Lesser Black Backed Gull (LBBG) – Habitat Improvement/Predator Fencing and Control for Nesting LBBG</b>			
	<b>NE Ref</b>	<b>RAG</b>	<b>NE Comment</b>
<b>Overall confidence in the measure</b>	D23		<p>Technically, we advise that the measures are feasible and could deliver adequate compensation. However, at present we are unable to agree the number of additional breeding pairs required to achieve compensation.</p> <p>We also have concerns that a suitable level of mitigation has yet to be identified for the potential impacts of installing and maintaining the fence on the designated features of the Orford Ness – Shingle Street SAC and Alde-Ore Estuary Ramsar site and SSSI.</p> <p>There is also uncertainty regarding whether the birds will find and occupy the compensation site at AOE SPA, and until further monitoring is carried out, the pressures considered to</p>

			<p>be affecting gulls on the Outer Trial Bank are not confirmed. It is also uncertain whether the land at either proposed compensation site will be secured.</p>
Theoretical merit to deliver compensation	D24		<p>In principle, we agree that the approach taken by the developer could deliver adequate compensation, subject to agreement on impact levels and compensation targets, and appropriate permissions being secured. Having two distinct measures provides significant resilience e.g. the Outer Trial Bank site may also help safeguard compensation delivery should birds fail to occupy the AOE SPA site in a timely manner or in adequate numbers.</p> <p>We therefore recommend that the two options are progressed as a package of measures, not least given the potential requirements of North Falls OWF as regards LBBG. North Falls are due to submit their application later in the year; since the project is seeking similar compensation measures, we recommend liaison between both developers to facilitate an effective outcome being delivered that benefits both parties.</p>
Technical feasibility	D25		<p>Adequate evidence has been provided to demonstrate technical feasibility for VE02, although without further data gathering and impact assessment as regards the impacts of the predator fence, we are not in a position to advise that impacts on the Orford Ness – Shingle Street SAC and Alde-Ore Estuary Ramsar site and SSSI will be adequately mitigated.</p> <p>As regards OTB, techniques for predator control and vegetation management are well established. However, OTB is a challenging site to access and sits in an area of high environmental sensitivity (The Wash SPA, SSSI and the Wash and North Norfolk Coast SAC). An appropriate access methodology and schedule for management has not been presented, and we consider an outline approach reflecting the above challenges should be submitted into the Examination in due course.</p>
Agreed compensation level	D26		<p>The compensation level has not been agreed yet. The predicted magnitude of collision mortality on LBBG (using Natural England's recommended approach) requires clarification. The figure presented in the Report to Inform Appropriate Assessment (RIAA) appears to be erroneous – see comments in our Relevant Representations (Appendix C). Until this has been resolved, Natural England is unable to agree the number of additional breeding pairs required to achieve compensation.</p> <p>Furthermore, the compensation requirement so far presented has been derived based on the mean number of mortalities predicted by the collision risk analyses. It is Natural England's advice that for compensation the requirement should be scaled up to the 95% UCI and not the central impact value.</p>

Scale/extent of measure	D27		Once the scale of impacts on the LBBG AOE SPA population have been agreed, the adequacy of the proposed level of compensation can be assessed. Proposals presented so far suggest this is likely to be the case should both the AOE SPA and OTB measures be progressed, once the number of predicted annual losses have been finalised and compensation is delivered at a ratio of 3:1.
Timing: Deliverable before impact	D28		The proposal to protect a site within the AOE SPA using predator proof fence will rely on the birds finding and occupying the site. There is a risk that the birds may be reluctant to nest on the ground such that the site remains unused or only occupied several years after the fence has been erected. The proposal may, therefore, rely heavily on the Outer Trial Bank site to deliver the additional compensation for the interim losses (at least until the fenced site becomes active). As such, Natural England recommends that both proposals are undertaken to reduce the risk – providing resilience should one site fail to deliver. We also advise the fence be erected 4 years in advance of the operational phase to extend the lead in time as much as possible – noting this schedule was required and achieved by the Norfolk projects.
Location of measure	D29		As negotiations with landowners at both sites remain on-going, there is currently uncertainty whether or not either site can be secured for the lifetime of the project. Within the AOE SPA, the onshore ecology may also affect the location of the proposed predator-proof fencing – see Appendix J – Onshore Ecology.
Long term implementation	D30		We advise that this approach to compensation is broadly adequate. However, for the predator-proof fencing proposal in the AOE SPA, no schedule for fence maintenance and checks has been provided or details about how this will be done and by whom. Fence maintenance will be crucial to prevent predator incursions and a key component of on-going management throughout the year. Plans will also need to be in place to address fence breaches so these can be resolved quickly. For the proposal at Outer Trial Bank, workable plans for monitoring and biosecurity will need to be in place.
Success criteria/Ability to prove additionality	D31		On site monitoring to assess breeding numbers and productivity are proposed and deliverable.
Suitable as sole measure for target species	D32		See note above. There would be significant risk in relying on a predator proof fence as a sole measure, given the likely level of impact and the risk of 'mortality debt' accruing. This is because its success relies upon the birds finding and occupying the site in a timely manner. Should there be a delay of several seasons before the birds occupy the AOE SPA site, or the birds do not use it at all, then the compensation delivery will require the Outer Trial Bank plans to deliver the additional compensation in the interim. This risk has been highlighted by the lack of breeding gulls in the Norfolk/East Anglia projects compensation compound in the 2023 breeding season (or thus far in 2024).
<b>Key uncertainties</b>			

Uncertainty	D33		<ul style="list-style-type: none"> <li>• Permission to use the site within the AOE SPA and erect the predator proof fencing has not yet been secured. Landowner agreement remains under negotiation.</li> <li>• The gulls may choose not to occupy the fenced site or do so at some point only after the wind farm becomes operational, thereby incurring a compensation deficit.</li> <li>• Fence maintenance has not been described and it is unclear who and how this will be done for the duration of the project.</li> <li>• Impacts on designated features of the SAC, SSSI and Ramsar site need to be better understood and mitigated.</li> <li>• Use of the OTB site remains under negotiation with the landowner and so has not been agreed yet.</li> <li>• It is possible that rat predation proves not an issue on OTB and therefore removing rats from the site makes no difference to the gull population size or breeding success.</li> <li>• The following information will become available during examination and may influence the final choice of sites or management approach: a) the success of the SPR/Vattenfall scheme in the 2024 breeding season (expected Q4 2024); b) further data on the colony size and health at Outer Trial Bank (expected Q3 2024) and c) Information from TCE and Defra on how the Outer Trial Bank site could be secured and delivered (expected Q2 2024).</li> <li>• The current primary limitation of population growth could be food supply and consequently the nesting habitat improvements proposed here could yield no measurable change in the number of breeding gulls at either site.</li> </ul>
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**Table 4 Natural England's Detailed Advice and Recommendations**

NE Ref	Section	Natural England's Comment	Recommendation	Risk
Document(s) Used: N/A				
D34		Please refer to Appendix A DCO for our advice on how the proposed compensation measures will be secured and implemented.	N/A	
D35		Please also refer to Appendix C Offshore Ornithology for our advice on both the EIA & HRA aspects of the VE application.	N/A	

## **Annex D1: Natural England check list for compensatory measure submissions**

Natural England has developed a checklist of those aspects of compensatory measures that need to be described in detail when developers are submitting or updating applications where impacts on MPAs are anticipated. Whilst not exhaustive, it lists key areas where sufficient detail is needed to provide the Secretary of State with appropriate confidence that compensatory measures can be secured.

- a) What, where, when: clear and detailed statements regarding the location and design of the proposal.
- b) Why and how: ecological evidence to demonstrate compensation for the impacted site feature is deliverable in the proposed locations.
- c) For measures on land, demonstrate that on ground construction deliverability is secured and not just the requirement to deliver in the DCO e.g. landowner agreement is in place. For measures at sea, demonstrate that measures have been secured e.g. agreements with other sea or seabed users.
- d) Policy/legislative mechanism for delivering the compensation (where needed)
- e) Agreed DCO/DML conditions.
- f) Clear aims and objectives of the compensation
- g) Mechanism for further commitments if the original compensation objectives are not met – i.e. adaptive management.
- h) Clear governance proposals for the post-consent phase – we do not consider simply proposing a steering group is sufficient.
- i) Ensure development of compensatory measures is open and transparent as a matter of public interest, including how information on the compensation would be publicly available.
- j) Timescales for implementation especially where compensation is part of a strategic project, including how timescales relate to the ecological impacts from the development.
- k) Commitments to ongoing monitoring of measure performance against specified success criteria
- l) Proposals for ongoing 'sign off' procedure for implementing compensation measures throughout the lifetime of the project, including implementing feedback loops from monitoring.
- m) Continued annual management of the compensation area including to ensure other factors are not hindering the success of the compensation e.g. changes in habitat, increased disturbance because of subsequent plans/projects.