

Helios Renewable Energy Project EN010140

Natural England - Principal Areas of Disagreement Statement (PADS) – Deadline 4

Date: 26 January 2025

PADS reference	Relevant Reps Key Issue ref(s)	Principal issue in question.	The brief concern held by Natural England which will be reported on further at relevant Examination deadlines.	What needs to change, be included, or amended, to overcome the disagreement.	Likelihood of the concern being addressed in examination.
PADS1	NE1, NE11 and NE12	Loss of functionally linked land (FLL) for the Humber Estuary SPA / Ramsar / SSSI and Lower Derwent Valley SPA / Ramsar (and underpinning SSSIs, Derwent Ings, Melbourne & Thornton Ings, and Brighton Meadows) (Construction and operation)	Natural England has engaged with the Applicant through our Discretionary Advice Service (DAS) on this topic. Natural England has provided advice on the outcomes of the functionally linked land assessment and have determined that the development site supports a significant number of lapwings. The Applicant has proposed mitigation for this loss of habitat which we have agreed to in principle.	The proposed mitigation measures should be included within an updated oLEMP to ensure they are secured within the DCO. Natural England will review this document when the revisions have been completed. This information will also be submitted within an updated HRA.	<u>Likely</u> to be addressed during Examination. Natural England have reviewed and agree with the proposals in principle.

PADS2	NE1, NE2, NE11 and NE12	Noise disturbance to birds using FLL associated with the Humber Estuary SPA / Ramsar / SSSI and Lower Derwent Valley SPA / Ramsar (and underpinning SSSIs, Derwent Ings, Melbourne & Thornton Ings, and Brighton Meadows) (Construction)	Natural England have reviewed additional submitted information through our DAS and have determined that noise impacts to land adjacent to the development proposals have been suitably addressed in the latest draft HRA. We will provide additional comments on this topic in a SoCG with the Applicant. However following the proposals for lapwing mitigation, we advise there should be consideration of potential disturbance to the mitigation area during construction.	Inclusion of information on the potential for noise impacts to the mitigation area, with suitable mitigation if required.	<u>Likely</u> to be addressed during Examination if further information / assessment is provided.
PADS4	NE8	Potential in-combination impacts on international designated sites. (Construction and Operation)	The previous iteration of the draft HRA did not include a full in combination assessment of the impacts.	Natural England are reviewing a revised version of the HRA through our DAS and will provide further comment on this issue for the next deadline.	<u>Likely</u> to be addressed during Examination if further information / assessment is provided.