



Planning
Inspectorate

REPORT on the IMPLICATIONS for EUROPEAN SITES

Proposed Tween Bridge Solar Farm

An Examining Authority report prepared with the support of the
Environmental Services Team

Planning Inspectorate Reference: EN010148

11 August 2026

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1 INTRODUCTION

1.1 Background

- 1.1.1 RWE Renewables UK Solar and Storage Limited ('the applicant') has applied for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA2008) for the proposed Tween Bridge Solar Farm ('the proposed development'). On behalf of the Secretary of State (SoS) for Housing, Communities and Local Government, an Examining Authority (ExA) has been appointed to conduct an examination of the application. The ExA will report its findings and conclusions and make a recommendation to the relevant SoS as to the decision to be made on the application.
- 1.1.2 For applications submitted under the PA2008 regime, the relevant SoS is the competent authority for the purposes of The Conservation of Habitats and Species Regulations 2017 ('The Habitats Regulations'). The findings and conclusions on nature conservation issues reported by the ExA will assist the SoS in performing their duties under The Habitats Regulations.
- 1.1.3 This Report on the Implications for European sites (RIES) documents and signposts the information in relation to potential effects on European sites that was provided within the DCO application and submitted during the examination by the applicant and interested parties (IPs), up to deadline 5 (DL5) of the examination (04 August 2026). It is not a standalone document and should be read in conjunction with the examination documents referred to. Where document references are presented in square brackets [] in the text of this report, that reference can be found in the Examination Library published on the 'Find a National Infrastructure Project' website by following the link below:
- <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010148/documents>
- 1.1.4 For the purpose of this RIES, in line with The Habitats Regulations and relevant Government policy, the term 'European sites' includes Special Areas of Conservation (SAC), candidate SACs, proposed SACs, Special Protection Areas (SPA), potential SPAs, listed and proposed Ramsar sites and sites identified or required as compensatory measures for adverse effects on any of these sites. For ease of reading, this RIES also collectively uses the term 'European site' for European sites as defined in The Habitats Regulations 2017, unless otherwise stated. The 'UK National Site Network' refers to SACs and SPAs belonging to the United Kingdom already designated under the Directives and any further sites designated under The Habitats Regulations.
- 1.1.5 This RIES is issued to ensure that IPs including the Appropriate Nature Conservation Body (ANCB) - Natural England (NE) - is consulted formally on Habitats Regulations matters. This process may be relied on by the SoS for the purposes of regulation 63(3) of The Habitats Regulations.
- 1.1.6 It also aims to identify and close any gaps in the ExA's understanding of IPs' positions on Habitats Regulations matters, in relation to all European sites and

qualifying features as far as possible, in order to support a robust and thorough recommendation to the SoS.

- 1.1.7 Following consultation, the responses will be considered by the ExA in making their recommendation to the SoS and made available to the SoS along with this report. The RIES will not be revised following consultation.

1.2 Documents used to inform this RIES

- 1.2.1 The applicant's Habitats Regulations Assessment (HRA) Report ('the HRA Report') comprised the following documents:

- Report to Inform Habitat Regulations Assessment [APP-028], updated as: [AS-004], [REP1-010], [REP2-010], [CR1-012], [REP4-011] [REP5-006]

- 1.2.2 The version submitted as [REP2-010] was submitted in response to the ExA's first written questions ([PD-010] Q2.0.39, Q2.0.43, Q2.0.44, Q2.0.45, Q2.0.46) to amend omissions from the previous versions or provide minor points of clarification and is referred to within this RIES as providing the applicant's initial assessment and conclusions.

- 1.2.3 In addition to the HRA Report, the RIES refers to representations submitted to the examination by IPs, Issue Specific Hearing (ISH) documents, Statements of Common Ground (SoCG) and other examination documents as relevant. All documents can be found in the Examination Library.

1.3 Change requests

- 1.3.1 To date, the applicant has made the following change request:

- Change request one [CR1-001] to [CR1-026], accepted by the ExA [PD-009] - summarised as:
 - Removal of Parcels 1/A, 1/B, 1/C, 1/D, 3/C, 3/D, and 3/E from the extent of land subject to compulsory acquisition, temporary possession and works powers under the Draft DCO.
 - A minor modification to the proposed permissive path route so that it would remain wholly within the limits of parcel 2/16.
 - To fence the proposed permissive path route within parcel 2/16.
 - To modify the extent of mitigation in parcel M1(A) so that it would avoid common land/ Countryside and Right of Way access land.
 - To clarify that no works would be carried out in the part of plot 2/A which is currently shown to encroach upon the Thorne and Hatfield Moors SPA and Thorne Moor SAC.

- 1.3.2 Relevant HRA matters arising from change request one are detailed in section 2 of this RIES.

- 1.3.3 The DL4 covering letter [REP4-001] noted a number of design modifications, which are summarised as follows:

- Removal of solar panels from Fields E19 and E20.
- Spatial refinement of 132 kilovolt (kV) Substation and 100 megawatt (MW) battery energy storage system (BESS) within Flood Zone 3b.
- Reconfiguration of solar panels within Field E15.

1.3.4 The applicant considered that the modifications do not increase the extent of development, introduce new infrastructure into previously unassessed areas, or alter the nature of the activities assessed. The removal of solar photovoltaic (PV) panel areas does not increase the potential for ecological effects and does not affect mitigation parcels. As such, these modifications do not comprise a formal change request.

1.4 RIES questions

1.4.1 This RIES contains questions predominantly targeted at the applicant, ANCB and host local authorities, which are drafted in **blue, bold text**.

1.4.2 The responses to the questions posed within the RIES and comments received on it will be of great value to the ExA in understanding IPs' positions on Habitats Regulations matters. It is stressed that responses to other matters discussed in the RIES are equally welcomed.

1.4.3 In responding to the questions in tables 3.1 to 3.4, please refer to the RIESQ number.

1.4.4 Comments on the RIES are timetabled for DL6 (22 September 2026).

1.5 HRA matters considered during the examination

1.5.1 The examination to date has focussed on the following matters:

- The methodology of the HRA screening, including the relevant impact pathways and qualifying features.
- Clarification over the inclusion of designated sites within the order limits.
- ANCB and other IP agreements with the conclusions of LSE for all European sites screened in.
- HRA implications of an amended construction and operational period resulting from a change in grid connection date.
- The potential for AEol from impact pathways that had not been assessed in the HRA Report.
- The level of detail and certainty of the in-combination assessment.
- ANCB and other IP agreements with the conclusions of AEol and adequacy of mitigation measures for all European sites assessed.

2 LIKELY SIGNIFICANT EFFECTS

2.1 European sites considered

Introduction

- 2.1.1 The proposed development is not connected with or necessary to the management for nature conservation of any European site.
- 2.1.2 The HRA Report [REP2-010] at paragraphs 2.1.11 and 2.1.13 states that the scoping exercise to identify sites for inclusion considered a 10 kilometre (km) zone of influence from the Order limits, with an extended 30km zone of influence for sites which are designated for mobile qualifying features. Further criteria used by the applicant to identify sites for inclusion are given at paragraph 5.1.2 of the HRA Report [REP2-010]

Sites within the UK National Site Network (NSN)

- 2.1.3 The applicant's HRA Report [REP2-010] at paragraphs 2.1.11 to 2.1.15 identified 11 No. European sites within the UK NSN for inclusion within the assessment, as detailed in table 2.1 below.

Table 2.1: European sites in the UK NSN identified in the applicant's HRA Report [REP2-010]

Name of European site	Distance from proposed development (km)
Thorne and Hatfield Moors SPA	0.53 hectares (ha) of the order limits are within the SPA
Thorne Moor SAC	0.53ha of the order limits are within the SAC
Hatfield Moor SAC	0.1km south
Humber Estuary SAC	5.6km northeast
Humber Estuary Ramsar site	5.6km northeast
Humber Estuary SPA	7.7km north
River Derwent SAC	13.8 km north
Lower Derwent Valley SAC	17.1km north
Lower Derwent Valley Ramsar site	17.1km north
Lower Derwent Valley SPA	17.2km north
Skipwith Common SAC	22.2km north

- 2.1.4 The locations of these sites relative to the proposed development are depicted in the HRA Report [REP2-010] at figure 2-2.

2.1.5 Based on the criteria given in the HRA Report, the following sites were scoped out of further assessment and did not proceed to the screening for LSE for the reasons given:

- River Derwent SAC – there is no hydrological connectivity between the order limits and SAC, and the distance means that direct impacts are unlikely.
- Lower Derwent Valley SPA and Ramsar site - the non-breeding and breeding bird surveys did not record any significant numbers of the qualifying features of the Lower Derwent SPA and Ramsar site utilising the order limits, and the distance of this SPA and Ramsar site to the order limits also ensures any impacts are unlikely.
- Lower Derwent Valley SAC – the site is designated for habitats only, with no mobile species, and is located further than 10km from the order limits.
- Skipwith Common SAC – the site is designated for habitats only, with no mobile species, and is located further than 10km from the order limits.

2.1.6 The ExA sought clarification from NE on its position on these sites ([PD-010] Q2.0.48). NE confirmed [REP2-105] agreement with the applicant's approach and conclusions on these sites.

2.1.7 The ExA also queried why the applicant had considered it necessary to include 0.53ha of the SPA and SAC within the Order limits, where no works are listed within this area within the dDCO ([PD-010] Q2.0.35). The applicant did not respond in detail within [REP2-087] as it instead proposed addressing this matter through a change request [CR1-001] to [CR1-026].

2.1.8 Only sites within the UK NSN are addressed in this RIES.

2.1.9 No additional UK European sites have been identified by IPs for inclusion within the assessment in the examination to date.

2.2 Potential impact pathways

2.2.1 The HRA Report [REP2-010] at table 5-2, section 6.2, and table 6-3 listed the sites and qualifying features and the impact pathways which could affect them. Section 6.2, table 6-3, and table 7-2 detailed the potential impacts from the proposed development, along with the potential geographical extent of effects.

2.2.2 The pathways below have been provided by the applicant in response [REP2-010] [REP2-037] to the ExA's first written questions ([PD-010] Q2.0.40, 2.0.41 and 2.0.47) and NE's relevant representation [RR-023] which sought clarity on the wording of the specific pathways assessed.

2.2.3 The HRA Report assessed the potential impacts during construction, operation and maintenance and decommissioning. The applicant considered that all potential impacts during the decommissioning phase would be similar to, and potentially less than, those outlined in the construction phase ([REP2-010], paragraph 6.2.58), and as such a separate assessment was not provided. Confirmation of the effects assessed for the operational phase in

[REP2-010] were provided by the applicant in an updated HRA Report [REP4-011].

Table 2.2 Pathways for LSE assessed by the applicant [REP2-010], tables 6-3 and 7-2

C – Construction

O – Operation

D - Decommissioning

European site	LSE pathway – Alone and in combination
Thorne and Hatfield Moors SPA	• Loss of potential foraging habitat (C, D). • Temporary disturbance impact from noise, artificial lighting, and visual impacts (C, O, D). • Degradation of foraging/ roosting habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D). • Degradation of foraging/ roosting habitat - Impacts to air quality, including dust and vehicle emissions (C, O, D).
Thorne Moor SAC	• Degradation of habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D). • Degradation of habitat - Impacts to air quality including dust and vehicle emissions (C, O, D).
Hatfield Moor SAC	• Degradation of habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D). • Degradation of habitat - Impacts to air quality including dust and vehicle emissions (C, O, D).
Humber Estuary SAC	(Omitted in error from table 7-2 of [REP2-010], later added by [REP4-011]) • Degradation of habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D). • Degradation of habitat - Impacts to air quality, including dust and vehicle emissions (C, O, D).
Humber Estuary Ramsar site	Habitats and lamprey: • Degradation of habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D). • Degradation of habitat - Impacts to air quality, including dust and vehicle emissions (C, O, D). Ornithological features: • Loss of FLL (C, D).

European site	LSE pathway – Alone and in combination
	Disturbance to foraging/ roosting habitat (including FLL) from noise, artificial lighting, and visual impacts (C, O D).
Humber Estuary SPA	- Loss of FLL (C, D). - Disturbance to foraging/ roosting habitat (including FLL) from noise, artificial lighting, and visual impacts (C, O, D).

2.2.4 During the examination, NE's [RR-023] submission (see table 2.3 of this RIES for further details) stated concerns over the assessment of the following impact pathways:

- Thorne and Hatfield Moors SPA and Thorne Moors SAC - Direct loss/ habitat damage of designated sites (NE0).
- Humber Estuary SPA and Ramsar site - Collision risk with existing wind turbines due to displacement (NE3).
- Humber Estuary SPA and Ramsar site - Recreational disturbance as a result of the construction of a permissive path without fencing to prevent access (NE5).
- Thorne and Hatfield Moors SPA - Collision risk with solar panels (NE8a).

2.2.5 The ExA sought clarity from NE ([PD-011], Q2.2.7) as to whether it considered that these were new impact pathways which had not been assessed in the HRA Report. NE [REP4-080] confirmed that these are not additional to matters already raised, and that these have either already been under discussion with the applicant and/ or already assessed in the HRA.

2.2.6 No other representations have been received to date on the matter of the impact pathways assessed.

2.3 In-combination effects

2.3.1 Section 4.3 of the HRA Report [REP2-010] detailed the applicant's approach to assessing in-combination effects. The projects included in the in-combination assessment were the same as those used for the cumulative impact assessment completed as part of the Environmental Statement (ES) [APP-054].

2.3.2 No additional plans or projects have been highlighted by IPs in the examination to date.

2.3.3 NE queried the level of detail and certainty of the applicant's in-combination assessment ([RR-023] NE19). NE considered that where there are small effects which are not significant alone, these should be assessed alongside similar small effects of other plans/ projects which were not significant alone.

2.3.4 The applicant [REP1-043] [REP1-057] stated that it considered the in-combination assessment had adequately assessed these risks and that where the project alone did not result in LSE, there is no pathway for impacts to occur

in-combination. However, at DL2, in response to NE and to the ExA's written question ([PD-010] Q2.0.30), the applicant provided an updated HRA Report [REP2-010] to include a new appendix with a detailed in-combination assessment. This was supported by accompanying ES documents [REP2-029] [REP2-056].

- 2.3.5 NE [REP3-075] indicated that whilst it welcomed the additional assessment, it required further assessment detail and clarification on how the pathways assessed for the project alone had been considered within the in-combination assessment. At DL4, the applicant provided an updated in-combination assessment in the HRA Report [REP4-011], supported by an updated ES cumulative effects chapter [REP4-019].
- 2.3.6 Within the most recent iteration of the SoCG with NE [REP5-055], and in response to NE's second written question responses [REP5-041], the applicant provided a summary of all relevant document updates submitted to the examination and how these were proposed to address NE's concerns. The matter was noted to be agreed in the NE DL5 submission [REP5-066] and revised SoCG [REP5-055], and NE confirmed within these that there would be no AEoI in combination.

2.4 The applicant's assessment

- 2.4.1 The qualifying features and LSE pathways screened in by the applicant are detailed in the HRA Report [REP2-010] at section 6.2 and table 6-3 and are identified in annex 1 tables A1.1 to A1.6 of this RIES.
- 2.4.2 The applicant's conclusions in respect of screening are also presented in the HRA Report [REP2-010] at paragraphs 2.1.14 and 5.1.3 (confirming which sites are scoped out of the LSE screening exercise), section 6.2 and table 6-3.

Sites and qualifying features for which the applicant concluded no LSE

- 2.4.3 The applicant concluded [REP2-010] that the proposed development would not be likely to give rise to significant effects, either alone or in combination with other projects or plans, on the following qualifying features of the following European sites:

Humber Estuary SPA

- Wintering features - avocet, bittern, hen harrier, bar-tailed godwit, shelduck, knot, dunlin, black-tailed godwit, redshank, ringed plover, grey plover, sanderling.
- Passage features - ruff, knot, dunlin, black-tailed godwit, redshank.
- Breeding features - bittern, marsh harrier, avocet, little tern.
- Assemblage feature component species - dark bellied brent goose, shelduck, wigeon, teal, pochard, scaup, goldeneye, bittern, oystercatcher, avocet, ringed plover, grey plover, knot, sanderling, dunlin, ruff, black-tailed godwit, bar-tailed godwit, whimbrel, curlew,

redshank, greenshank, turnstone, green sandpiper, little egret, shoveler, crane.

Humber Estuary Ramsar site

- Criterion 3 – colony of grey seals, breeding natterjack toads.
- Criterion 6 – knot (passage and wintering), dunlin (passage and wintering), black-tailed godwit (passage and wintering), redshank (passage and wintering), shelduck (wintering), bar-tailed godwit (wintering).

Humber Estuary SAC

- Annex II species - grey seal.

Sites for which the applicant concluded LSE on some or all qualifying features

- 2.4.4 The applicant concluded [REP2-010] that the proposed development would be likely to give rise to significant effects, either alone or in combination with other projects or plans, on one or more of the qualifying features of:

Thorne and Hatfield Moors SPA - breeding nightjar

- Loss of potential foraging habitat
- Disturbance impact from noise, artificial lighting, and visual disturbance
- Changes to hydrological regime, and degradation of habitat from polluting incidences and run-off (water quality and quantity)
- Degradation of habitat - Impacts to air quality, including dust and vehicle emissions

Thorne Moors SAC - degraded bogs still capable of regeneration

- Changes to hydrological regime and degradation of habitat from polluting incidences and run-off (water quality and quantity)
- Degradation of habitat - Impacts to air quality, including dust and vehicle emissions

Hatfield Moors SAC - degraded raised bogs still capable of natural regeneration

- Changes to hydrological regime and degradation of habitat from polluting incidences and run-off (water quality and quantity)
- Degradation of habitat - Impacts to air quality, including dust and vehicle emissions

Humber Estuary SPA – (assemblage feature component species) pink footed goose, mallard, lapwing, greylag goose, golden plover, and wintering golden plover

- Loss of FLL (all features except for golden plover as the HRA Report states that the site is not FLL for this feature)
- Disturbance to foraging/ roosting habitat (including FLL) from noise, artificial lighting, and visual disturbance

Humber Estuary Ramsar site

- Criterion 1 – estuarine habitat (omitted in error from table 7-2 of [REP2-010, later added by [REP4-011])
 - Changes to hydrological regime (water quality or quantity)
- Criterion 5 – waterfowl assemblage in non-breeding season
 - Loss of FLL
 - Disturbance to FLL from noise, artificial lighting, and visual disturbance
- Criterion 6 – golden plover (passage and wintering)
 - Disturbance to foraging/ roosting habitat from noise, artificial lighting, and visual disturbance
- Criterion 8 – migration route for river lamprey and sea lamprey
 - Changes to hydrological regime (water quality and quantity)
 - Degradation of habitat - Impacts to air quality, including dust and vehicle emissions

Humber Estuary SAC - all qualifying features except for grey seal (omitted in error from table 7-2 of [REP2-010], later added by [REP4-011])

- Changes to hydrological regime (water quality and quantity)
- Degradation of habitat - Impacts to air quality, including dust and vehicle emissions

2.4.5 The applicant's LSE screening conclusions were disputed by IPs and questioned by the ExA during examination. See section 2.5 of this RIES for further details.

2.5 Examination matters

2.5.1 Matters raised to date, or those for which the ExA seeks clarity, in relation to LSE screened out or not considered by the applicant are summarised in table 2.3 below.

Table 2.3: Issues raised in the examination to date by the ExA and IPs in relation to the applicant's screening of LSE (alone and in-combination)

ID	Issue Summary	Details of issue	ExA observation
Thorne and Hatfield Moors SPA and Thorne Moor SAC			
2.3.1	Potential loss/ direct damage to designated habitats included within the order limits – construction and operation	Within its relevant representation ([RR-023] NE0), NE noted that as the order limits included an area of the SPA/ SAC, a commitment that no works would be undertaken within the SAC/ SPA boundary should be secured in the draft DCO (dDCO). The applicant [REP1-043] [REP1-057] confirmed that it considered the outline Ecological Construction Management Plan (oECMP) [REP1-032], secured via requirement 8 of the dDCO [REP1-004], adequately states the implementation of habitat protection buffers and prohibits works within the sites. The applicant also confirmed at ISH1 [REP1-046] that it would update the land plans to clarify that no order powers would be exercised in relation to land forming part of the SPA (and which is also noted to form part of the SAC). The outline Landscape Ecological Management Plan (oLEMP) was also updated [REP1-034] to include further detail and commitments in relation to mitigation buffer zones, to be of a minimum of 150 metres (m) from the designated site boundary. NE confirmed [REP2-105] in response to ([PD-010] Q2.0.35) that it was in discussion with the applicant over the design of the mitigation areas and securing restrictions on works within the sites [REP2-105]. The outstanding concern was later clarified as the ability to agree exceptions to the exclusion of works within the site with the appointed ecological clerk of works (ECoW) [REP3-075]. At DL4, the applicant provided updates to the HRA Report [REP4-011], oECMP [REP4-053] and oLEMP [REP4-055] to provide confirmation of the buffer zones, and to state that no works would be permitted within the sites, with no reference to the ability of an ECoW to provide exemptions. In the updated SoCG [REP5-055] and responses to NE's second written questions [REP5-041], the applicant confirmed that no works are proposed in Thorne and Hatfield Moors	This matter is considered to be resolved.

ID	Issue Summary	Details of issue	ExA observation
		SAC or SPA. The oECMP was updated [REP5-030] with information regarding the buffer zones and prohibited works and is proposed to be secured via requirement 8 of the dDCO [REP5-002]. NE [REP5-066] and the updated SoCG [REP5-055] confirmed that the updates to the documents were considered sufficient to rule out AEol and that this matter is now agreed and the mitigation measures secured.	
Humber Estuary SAC and SPA			
2.3.3	Clarification of qualifying features	The ExA noted that survey results were presented in the HRA Report [AS-004] for green sandpiper, greylag goose, little egret, shoveler, common crane and pink footed goose, with greylag goose and pink footed goose being assessed for LSE. This was despite these species not being listed on the SPA citation as qualifying features ([PD-010] Q2.0.38). NE [REP2-105] confirmed that it did not have concerns over the assemblage species included by the applicant, and referred to the availability of the most recent list of assemblage features [REP3-076] which confirmed the approach to pink footed goose and greylag goose, as well as the inclusion of the other species. The applicant also responded [REP2-087] to confirm that the HRA Report [REP2-010] provided a justification for the assessment of pink footed goose and greylag goose (related to being present in numbers exceeding the 1% threshold of their WeBS 5-year mean). The HRA Report [AS-004] also confirms that the other species listed were not present in numbers that would indicate a functional linkage and were therefore not taken forwards to further assessment.	This matter is considered to be resolved.
Humber Estuary SPA			
2.3.3	Clarification of qualifying features - component	The HRA Report [REP2-010] assesses LSE for a number of individual qualifying features, and species considered to be component parts of the waterbird assemblage, with some species assessed in both. The ExA sought clarity from NE as to whether the HRA Report had assessed the most up-to-date list of assemblage features ([PD-010] Q2.0.36).	This matter is considered

ID	Issue Summary	Details of issue	ExA observation
	species of the waterbird assemblage	NE [REP2-105] confirmed that it did not have concerns over the assemblage species included by the applicant, and that its main areas of disagreement with the applicant's conclusions were in relation to lapwing, mallard, pink footed goose, golden plover and greylag goose, as detailed in tables 3.1 to 3.4 below.	to be resolved.
2.3.4		The ExA noted a potential discrepancy between the published datasheet for the SPA citation which lists wintering ringed plover, grey plover and sanderling ([PD-010] Q2.0.37) as individual and assemblage qualifying features, and the HRA Report [REP2-010] which assessed these features as part of the assemblage only. The applicant responded [REP2-087] to confirm updates to the HRA Report [REP2-010] and to confirm that the conclusion of no LSE is relevant for these species as both individual wintering and assemblage qualifying features.	This matter is considered to be resolved.
2.3.5	HRA methodology - consideration of mitigation during screening	The ExA noted that [REP2-010] paragraph 6.2.45 states that retention of habitats will ensure availability of habitat for teal, hen harrier and marsh harrier. However, it was not clear if the mitigation measures are relied upon to screen out these species ([PD-010] Q2.0.42). The applicant responded [REP2-087] to confirm updates to the HRA Report [REP2-010] which screened out LSE for these qualifying features due to low numbers within the order limits or an absence of FLL.	This matter is considered to be resolved.

2.6 Summary of examination outcomes in relation to screening

- 2.6.1 The ExA's understanding of the applicant's and NE's current positions in relation to LSE is set out above and in annex 1 tables A1.1 to A1.6 of this RIES.
- 2.6.2 This conclusion is not final and could be subject to change further to any additional representations received during the examination.

3 ADVERSE EFFECTS ON INTEGRITY

3.1 Conservation objectives

- 3.1.1 The conservation objectives for the SPA and SAC European sites for which a LSE was identified by the applicant at the point of the DCO application were included within the HRA Report [REP2-010] at section 5.1.
- 3.1.2 The HRA Report [REP2-010] confirms that Ramsar sites do not have conservation objectives detailed in the same way as they are for SPAs and SACs, although there is an overall Humber Management Scheme that provides a coordinated approach for the management of the Humber Estuary.
- 3.1.3 The ExA sought clarity from the applicant ([PD-010] Q2.2.9) on how the conservation objectives had been considered in the HRA Report. The applicant responded [REP4-062] to outline the approach and conclusions and provided this in an updated HRA Report [REP4-011].

3.2 The applicant's assessment

- 3.2.1 The European sites and qualifying features for which LSE were identified were further assessed by the applicant to determine if they could be subject to AEol from the proposed development, either alone or in combination. The outcomes of the applicant's assessment of effects on integrity are summarised in the HRA Report [REP2-010] at sections 7.1 and 7.2.

Mitigation measures

- 3.2.2 The applicant's HRA Report [REP2-010] identified mitigation measures in section 7.3 and table 7-2. These were taken into account in the applicant's assessment of effects on integrity.

Sites for which the applicant concluded no AEol

- 3.2.3 The applicant concluded that the proposed development would not adversely affect the integrity of any of the European sites and features assessed, either alone or in combination with other projects or plans.
- 3.2.4 The applicant's conclusions in respect of the 6 European sites assessed for potential AEol were disputed by IPs and questioned by the ExA during the examination. See section 3.3 of this RIES for further details.

3.3 Examination matters

- 3.3.1 Matters raised in the examination to date, or for which the ExA seeks clarity, in relation to AEols are summarised in tables 3.1 – 3.4 below.
- 3.3.2 The ExA also questioned NE [PD-010] (Q2.0.50, Q2.0.51, Q2.0.52) and the applicant ([PD-010] Q2.0.24, [PD-011] Q2.2.10, Q2.2.12 and Q2.2.13) to request clarity on minor points related to the methodology and position on qualifying features and designated sites.

Table 3.1: Issues affecting all sites assessed for AEoI - Issues raised in the examination to date by the ExA and IPs in relation to the applicant's assessment of effects on integrity (alone and in-combination)

ID	Issue Summary	Details of issue	ExA observation/question
3.1.1	Assessment of impacts of preliminary works prior to "commencement"	In its local impact report, City of Doncaster Council (CDC) [REP1-062] considered that the definition of "commence" within the dDCO excludes "permitted preliminary works". CDC therefore considered that works such as vegetation removal could take place prior to the approval and implementation of management plans and the mitigation measures contained within. The applicant [REP2-089] considered that the dDCO drafting was preceded in other solar farm applications, and that the applicant would ensure the permitted preliminary works would be carried out in accordance with the outline management plans, as to not do so would result in the potential for site conditions which would not permit discharge of the requirements. The ExA explored this matter at ISH2 in relation to how these works have been assessed, in particular in relation to FLL. The applicant [REP3-047] confirmed that the dDCO contained control measures in the form of a requirement that preliminary works would only be permitted if there were "unlikely to give rise to any materially new or materially different environmental effects to those assessed". The applicant also considered that the activities would be minimal in nature and scale. CDC [REP3-081] maintained that the current assessment and management plans did not refer to the permitted preliminary works, and therefore these works would not be subject to any control measures, unlike other made DCOs which restricted these types of works prior to the approval of management plans. The applicant undertook a review of the scope of the permitted preliminary works and elected to provide a specific "carve-out" in relation to requirement 8 (oLEMP) of the dDCO [REP4-003] to clarify the permitted works (as detailed in [REP4-058] and [REP4-065] and provision of relevant control measures.	RIESQ1: To CDC and NE: Please confirm your position on the "carve-out" provided within the dDCO in relation to the oLEMP and if there are any remaining concerns in relation to the scope of the permitted preliminary works and potential impacts to European Sites? If there are remaining concerns, provide reasoning and clearly set out specific actions

ID	Issue Summary	Details of issue	ExA observation/ question
		The ExA does note, however, that this matter does not appear in the dDCO section of the SoCG [REP5-047], and that the extent to which this matter is agreed or not between the applicant and CDC remains unclear.	that, in your view, the applicant should take to resolve those concerns.
3.1.2	HRA implications of amended construction and operational dates	The applicant provided [AS-026] which detailed that the assessed connection date of a single year of 2029 may have to be delayed to a range of dates of 2031 to 2035. The ExA sought clarity on the potential HRA implications of this delay and the flexible grid connection date and location ([PD-010] Q2.0.29). The applicant responded [REP2-087] to provide a “sensitivity test” [REP2-091] which addressed the potential differing construction scenarios and connection dates. The applicant confirmed that no materially new or materially different effects arise from a later connection date or varied construction scenarios, and that the HRA Report conclusions remain valid, with further supporting information provided [REP4-062] in response to ([PD-011], Q2.2.11). NE [REP4-080] in response ([PD-011], Q2.2.11) noted that it broadly agreed with the conclusions, however sought clarity on 3 matters: • How any updates required to the pre-construction baseline (bird surveys) as a result of a delayed construction start date are secured. • How any changes to the proposed mitigation measures as a result of the updated baseline surveys would be specified in the oLEMP and other mitigation documents. • How data gaps in the in-combination assessment as a result of new projects being proposed during a delayed construction period would be considered (though noting that the projects would also have to consider Tween Bridge Solar in their cumulative assessments).	RIESQ2: To NE: Noting the applicant’s response at DL5, please provide your latest position on this matter and set out whether there are any implications for the conclusions on AEol? If there are remaining concerns, provide reasoning and clearly set out specific actions that, in your view, the applicant should take to

ID	Issue Summary	Details of issue	ExA observation/ question
		The applicant provided a response to NE's second written question response [REP5-041], an updated HRA Report [REP5-006], and an updated oECMP [REP5-030] to confirm that prior to construction, a desk study and walkover survey will be undertaken within the order limits to determine whether the suitability of habitats for passage and non-breeding birds has changed since the baseline surveys were completed. The results of these survey will be used to inform the ecological mitigation to be included within the final LEMP. The applicant also noted NE's position on the status of cumulative assessments.	resolve those concerns.
3.1.3	Potential water quality/ quantity impacts (abstraction of surface water for Horizontal Directional Drilling (HDD)) – construction only	NE considered ([RR-023] NE14) that it was not specified within the application documents where water, required for HDD, would be abstracted from. In the event that this is sourced from watercourses, NE considered that there may be impacts to all sites assessed due to hydrological linkages, and that the HRA Report had omitted an assessment of this. The applicant [REP1-043] [REP1-057] confirmed that the water would be sourced from off-site, and that no water abstraction from local watercourses was expected, as confirmed in the oECMP [REP1-032]. NE [REP3-075] continued to advise that the water source should be confirmed. However, at DL4 following the most recent SoCG, NE [REP4-080] confirmed that subject to no water abstraction from the ditch network within the order limits being secured through the dDCO (via the oECMP), this matter was agreed. The applicant confirmed the updates to the oECMP at DL5 in its response to NE's second written question responses [REP5-041], and this matter was noted to be agreed within the updated SoCG [REP5-055] and NE's submission [REP5-066], based on the updated oECMP and as the oLEMP is to be secured by the dDCO. However, the ExA seeks clarity from NE on the sites subject to agreement of no AEol.	RIESQ3 - To NE – For entries NE14 to NE18 [REP5-066], the ExA notes that [RR-023], clarified by [REP2-105], refers to the 6 sites taken forwards to the assessment of AEol. However, the agreement provided in [REP4-080] and [REP5-066] only refer to some of those sites. Can NE confirm whether its agreement of no AEol relates to all

ID	Issue Summary	Details of issue	ExA observation/ question
			6 sites for entries NE14 to NE18?
3.1.4	Potential water quality impacts (contaminated water run-off) – construction only	NE considered ([RR-023] NE15) that insufficient detail had been provided on mitigation measures for contaminated water run-off. The applicant [REP1-043] [REP1-057] stated that its position was that the assessment of the pathway and required mitigation measures were adequately detailed in the HRA Report [REP2-010] and oECMP [REP1-032]. NE confirmed [REP3-075] that it required further (unspecified) updates to the HRA Report to confirm the relevant mitigation measures, which the applicant provided [REP4-011] (with an updated oLEMP) [REP4-055]. At DL4, NE [REP4-080] referred to its DL3 submission and noted that this matter required minor clarifications only. The applicant, in the updated SoCG [REP5-055] and in response to NE's second written questions responses [REP5-041] confirmed that the requirement to source water from offsite was included in the previous updates to the oECMP and HRA Report. NE confirmed [REP5-066] that the relevant measures set out within the HRA Report are sufficient to conclude no AEol and that this matter is considered agreed and secured through the oECMP, as also confirmed in the SoCG [REP5-055].	This matter is considered to be resolved.
3.1.5	Potential water quality impacts (bentonite breakout) – construction only	NE considered ([RR-023] NE16) that the HRA Report had omitted an assessment of bentonite breakout from HDD works, including identifying any mitigation measures required to prevent AEol. The applicant [REP1-043] [REP1-057] responded to refer to the updated oECMP [REP1-032] and HRA Report [REP1-010] which included confirmation of mitigation measures for bentonite breakout. NE noted [REP3-075] [REP4-080] the updated HRA Report [REP2-010], and that, subject to NE being included as a consultee on the proposed bentonite	RIESQ4 – To the applicant – Can you confirm how it is secured in the dDCO that NE would be consulted on the proposed

ID	Issue Summary	Details of issue	ExA observation/ question
		breakout plan, this matter and conclusion of no AEol were agreed, which was confirmed in [REP4-080] [REP5-066] and the updated SoCG [REP5-055]. The applicant also confirmed the updates to the relevant documents in response to NE's second written questions [REP5-041]. However, the ExA seeks clarity on how NE would be consulted on the bentonite breakout plan.	bentonite breakout plan?
3.1.6	Potential water quality impacts (run-off of solar panel cleaning chemicals) – operation only	NE considered ([RR-023] NE17) that the HRA Report had omitted an assessment of the run-off of chemicals used to clean solar panels, including identifying any mitigation measures required to prevent AEol. The applicant [REP1-043] [REP1-057] (and in an updated HRA Report [REP1-010]) confirmed that the anticipated panel maintenance methodology would use de-ionised water in most instances, with limited potential for impacts where chemicals were required in exceptional circumstances. NE [REP2-095] initially confirmed that pending a review of the updated HRA Report, that this matter was agreed, however, further updated its position [REP3-075] to request information on the mitigation measures to prevent impacts from the occasions of chemical use. The applicant provided this in an updated HRA Report [REP4-011]. At DL4, NE [REP4-080] referred to its DL3 submission and noted that this matter required minor clarifications only. The applicant confirmed in the updated SoCG [REP5-055] and in response to NE's second written question responses [REP5-041], referred to the previous updates of the HRA report, which NE [REP5-066] confirmed that are sufficient to conclude no AEol and that this matter is considered agreed, with measures secured by the oECMP (as also confirmed by the SoCG [REP5-055]).	This matter is considered to be resolved.
3.1.7	Potential water quality impacts (run-off of fire suppression)	NE considered ([RR-023] NE18) that the HRA Report had omitted an assessment of run-off of water used in any firefighting incidents including identifying any mitigation measures required to prevent AEol.	This matter is considered to be a "yellow" issue on the NE submissions which

ID	Issue Summary	Details of issue	ExA observation/ question
	water) – operation only	The applicant [REP1-043] [REP1-057] stated that the outline Battery Safety Management Plan (oBSMP) [APP-179] includes provision for the development of a drainage strategy post-consent to ensure that firefighting water run-off is retained on-site and cannot be released to the wider environment until it has been tested for potential contamination. NE confirmed [REP3-075] that its outstanding concerns related to the detail of whether a sealed system would be used and whether discharge or collection for off-site disposal was proposed. At DL4, NE [REP4-080] referred to its DL3 submission and noted that this matter required minor clarifications only. The applicant stated in the updated SoCG [REP5-055] and responses to NE's second written question responses [REP5-041] that the outline Surface Water Drainage Strategy includes detail regarding the containment strategy, including use of a penstock and impermeable liner. The applicant also stated that a detailed drainage strategy (within the oBSMP [REP5-028]) will be developed post-consent. Whilst this matter was noted to be under discussion in the SoCG [REP5-055], NE's DL5 submission [REP5-066] confirmed that this matter was resolved in terms of agreement over the conclusions of no AEoI. NE, however, considered this to be a "yellow" category as advice relating to post-consent/ permitting works would be deferred to the Environment Agency. NE also provided a summary of the requirements that the detailed drainage plan should meet.	NE do not consider would make a material difference to the conclusions of no AEoI.

Table 3.2: Issues affecting multiple sites assessed for AEol - Issues raised in the examination to date by the ExA and IPs in relation to the applicant's assessment of effects on integrity (alone and in-combination)

ID	Issue Summary	Details of issue	ExA observation/question
Thorne and Hatfield Moors SPA and Humber Estuary SPA			
3.2.1	Potential disturbance to FLL from lighting – construction and operation	NE considered ([RR-023] NE10) that insufficient detail had been provided in the assessment of AEol from the potential visual disturbance from lighting impacts. The applicant [REP1-043] [REP1-057] and within an updated HRA Report [REP1-010] and oECMP [REP1-032] provided further detail on the lighting strategy, design, and additional mitigation measures related to reducing light spill. Further detail was given in response [REP2-089] to the CDC Local Impact Report (LIR) to confirm working hours would be during daylight hours only where possible, and that short spells of the use of artificial lighting during winter would not require additional mitigation. NE confirmed [REP3-075] that, provided the relevant mitigation measures were included in the oLEMP and made reference to specific SPA species, the conclusion of no AEol was agreed, which was confirmed in [REP4-080]. NE confirmed that the updated HRA [REP4-011] addresses the outstanding concerns, and that provided the oECMP is updated with the mitigation measures proposed, this matter and the conclusion of no AEol are agreed (as also confirmed by the updated SoCG [REP5-055]).	RIESQ5 - To the applicant – Please provide confirmation of when the required updates to the oECMP will be or have been submitted to the examination.
Thorne Moor SAC and Humber Estuary SPA			
3.2.2	Hydrological impacts – construction and operation	NE considered ([RR-023] NE11, later amended to NE11b at DL5) that insufficient detail had been provided on hydrological changes as a result of mitigation earthworks, and the potential to improve water retention and reprofile peat cuttings as part of the mitigation design, in area M1(A).	This matter is considered to be resolved in relation to the agreement

ID	Issue Summary	Details of issue	ExA observation/question
		The applicant [REP1-043] [REP1-057] stated that it considered the raising of water levels may lead to unacceptable downstream flood risk impacts and was therefore not appropriate. NE confirmed [REP3-075] that its outstanding concerns were still related to achieving the required hydrological levels and the use of peat cuttings. However, at DL4, NE [REP4-080] confirmed that as the oLEMP confirmed that management of the mitigation area does not conflict with managing impacts to, and allowing for enhancements of, the hydrology of the SAC and SPA, the conclusion of no AEol was agreed. The updated SoCG [REP5-055] confirmed that the applicant had considered NE's comments on the overall hydrological conditions, but reiterated that the blocking of drainage ditches or deliberate flooding of certain areas would potentially result in adverse downstream flood risk impacts and were therefore not considered. NE confirmed [REP5-066] that the measures outlined in the oLEMP [REP4-055] and updated HRA Report [REP4-011] are sufficient to rule out AEol for Thorne Moor SAC (as also confirmed by the updated SoCG REP5-055). To note – This matter is considered to be grey (indicated to be a matter for the Secretary of State) by NE, and under discussion in the SoCG [REP5-055] as discussions are ongoing over the transfer of the mitigation area to ownership or control by NE. NE have provided specific agreement of no AEol from this pathway.	over the conclusions of no AEol (NE11b).
Thorne Moor SAC and Hatfield Moor SAC			
3.2.3	Air quality impacts – construction only	NE considered that insufficient detail had been provided on mitigation measures for dust generation ([RR-023] NE12), as it was not clear if the measures were specifically designed to avoid effect to the SACs. The applicant [REP1-043] [REP1-057] provided an updated oECMP [REP1-032] and updated mitigation measures, including additional dust suppression where works would be within 200m of a designated site.	RIESQ6 - To the applicant – Please provide confirmation of when the

ID	Issue Summary	Details of issue	ExA observation/question
		NE [REP2-095] [REP3-075] confirmed the HRA Report should be updated to include reference to the SAC and SPA and all project phases and activities. However, subject to this, the conclusion of no AEol was agreed, which was confirmed at DL4 [REP4-080]. The applicant reiterated in the updated SoCG [REP5-055] that the potential for, and mitigation for, dust impacts had been adequately considered in the HRA Report [REP4-011] and measures secured via the oECMP [REP4-053] to include the updated mitigation measures discussed during the examination. NE noted [REP5-066] the updates to the HRA Report [REP4-011] but identified that sections of the oECMP [REP4-053] include measures solely for the breeding nightjar feature of the Thorne and Hatfield Moors SPA. NE considered that the HRA Report should include all relevant impacts for the Thorne Moor SAC, as for the SPA. Subject to this, this matter and the conclusion of no AEol were agreed, as also recorded in the SoCG [REP5-055].	required updates to the HRA Report will be or have been submitted to the examination.
3.2.4	Air quality impacts – construction only	NE considered ([RR-023] NE13) that insufficient detail had been provided on mitigation measures for emissions for non-road mobile machinery (NRMM). This was particularly in relation to the use of a generic 200m buffer zone without consideration of specific works locations, and absence of information on the number, capacity, and operational hours of back-up generators. The applicant, in response [REP1-043] [REP1-057] and in an updated HRA Report [REP1-010] and oECMP [REP1-032], provided updated mitigation measures, including additional controls on NRMM within 200m of a designated site. NE [REP2-095] confirmed that, pending a review of the updated documents, this matter was agreed. At DL3 [REP3-075], NE noted a change of approach to standard advice on air quality, with issue NE13 not being considered further by NE in the examination and this matter changed to “yellow” which NE considered would not make a material difference to the conclusions of no AEol.	RIESQ7 - To the applicant – Please provide confirmation of how the HRA Report and design of mitigation measures has taken into account the NE standing

ID	Issue Summary	Details of issue	ExA observation/ question
			advice in relation to air quality.

Table 3.3: Humber Estuary SPA and Ramsar site - Issues raised in the examination to date by the ExA and IPs in relation to the applicant's assessment of effects on integrity (alone and in-combination)

ID	Issue Summary	Details of issue	ExA observation/ question
3.3.1	Mitigation measures for potential loss (and disturbance) of FLL – construction only	NE considered ([RR-023] NE4) that it was not clear whether mitigation areas would be in place prior to construction works. The applicant confirmed at ISH1 [REP1-046], in response to NE's relevant representation [REP1-043] [REP1-057] and in an updated non-breeding bird mitigation strategy (NBBMS) [REP1-019], oECMP [REP1-032] and oLEMP [REP1-034], that any mitigation areas would be in place prior to the occurrence of the construction or operational effects that it was designed to mitigate. The applicant also confirmed that the mitigation was suitable for the different construction scenarios permitted in the dDCO. NE ([REP3-075] (NE1a which combined the previous matters NE1 to NE6)) confirmed that its outstanding concerns related to confirmation as to whether the mitigation parcels would be fully implemented, functional and subject to monitoring and suitability checks prior to construction. The applicant provided further supporting information on the mitigation timings in an updated oLEMP [REP4-055] and oECMP [REP4-053]. This matter and the conclusion of no AEol were noted to be agreed in the NE DL5 submission [REP5-	This matter is considered to be resolved pending the mitigation document updates as discussed in NE1/ NE1a in entry 3.3.3 below).

ID	Issue Summary	Details of issue	ExA observation/ question
		066] and revised SoCG [REP5-055] pending the updates to the oLEMP required by NE1a.	
3.3.2	Potential disturbance to FLL from noise and visual impacts—construction only	NE considered ([RR-023] NE7) that insufficient detail had been provided in the assessment of AEol from noise and visual disturbance to FLL during construction, in relation to the justification of the predicted noise level assessed by the applicant, uncertainty over the location of noise-generating works and criteria for the use of permanent and temporary noise barriers (to be decided by the ECoW). The applicant [REP1-043] [REP1-057] and in updated HRA Report [REP1-010] and oECMP [REP1-032] gave additional detail on the mitigation measures, including the locations of works above 70 decibels (dB) and criteria for ECoW assessment. NE confirmed ([REP3-075], NE1a) its outstanding concerns related to a requirement to utilise average (L_{aeq}) and maximum/ sudden (L_{Amax}) noise levels, as both can affect the behaviour of qualifying features. NE also requested further clarity on how the ECoW would decide if the threshold for additional mitigation had been reached. Whilst NE's position at DL4 was that this matter was still under discussion, the applicant provided an updated HRA Report [REP4-011] and oECMP [REP4-053] to confirm the thresholds and other monitoring responsibilities of the ECoW, and additional confirmation of seasonal restrictions on noise generating works. The updated SoCG [REP5-055] stated that there is no L_{Amax} or L_{Apeak} source data for solar panel frame piling and therefore it is not possible to undertake any predictive calculations, and as such seasonal restrictions and use of an ECoW have been proposed instead. NE stated [REP5-066] that email communications between NE and the applicant had clarified that the seasonal restriction on works will be October to February (instead of the originally proposed November to February). NE stated that the applicant has agreed to update all relevant documents with this restriction and pending this, this matter and the conclusion of no AEol were agreed (as also confirmed in the SoCG [REP5-055]).	RIESQ8 - To the applicant – Please provide confirmation of when the required updates to the relevant mitigation and assessment documents referred to by NE will be or have been submitted to the examination.

ID	Issue Summary	Details of issue	ExA observation/ question
3.3.3	Mitigation measures for potential loss (and disturbance) of FLL – construction and operation	NE considered ([RR-023] NE1) that insufficient detail had been provided on the specific suitability of the proposed habitat provision for features subject to LSE. Lincolnshire Wildlife Trust (LWT) [RR-019] [REP1-046] agreed with NE, however, no further submissions have been received. The applicant [REP1-043] [REP1-054] [REP1-057] outlined the approach to the design of mitigation areas, with reference to the breeding and non-breeding bird surveys, bird day calculations, and individual species behaviour. Updates were also provided to the HRA Report [REP1-010], NBBMS [REP1-019] and oLEMP [REP1-034] to include a detailed description of the design of each mitigation parcel and provide measurements of areas of 150m vistas as required by the target species. The applicant provided further updates to the oLEMP [REP2-070] and HRA Report [REP2-010] to include a new section on scheme design, and updates to mitigation measures for the individual species. NE raised some minor further queries [REP2-095], which were responded to by the applicant in the same document, including confirming that mitigation parcel M1(A) would be restructured, rather than removed fully, as a result of change request 1. The ExA sought clarity as to any implications of a reduction in the area of M1(A) ([PD-011], Q2.2.8). The applicant [REP4-062] and NE [REP4-080] confirmed that neither considered that area (M1(A)) is specifically for mitigation for a European site, and the mitigation strategy is considered as a whole rather than relying on individual parcels. NE ([REP3-075], NE1a) provided further detail on the outstanding areas of concern. These related to connectivity between parcel M11, M12 and M13, the requirement for a larger area to be managed for pink footed goose, and the consideration of the existing hydrological regime in the creation of scrapes. NE also requested details of how on site and adjacent habitat quality, bird surveys, boundary features, and additional monitoring would be undertaken for lapwing, mallard, pink footed goose, golden plover and greylag goose.	RIESQ9 - To the applicant – Please provide confirmation of when the required updates to the oLEMP will be or have been submitted to the examination. RIESQ10 - To Lincolnshire Wildlife Trust – Please provide an update to your position on this matter following the applicant's and NE's deadline 5 submissions.

ID	Issue Summary	Details of issue	ExA observation/ question
		The applicant provided updates to the NBBMS [REP4-029], oECMP [REP4-053] and oLEMP [REP4-055]. The updates included mitigation design (including new figures), a summary for each parcel of the baseline bird use, surrounding habitats, design considerations for specific species, and additional bird day calculations and mitigation design for greylag goose. Within the updated SoCG with NE [REP5-055], and in response to NE's second written question responses [REP5-041], the applicant provided a summary of all relevant document updates submitted to the examination and how these were proposed to address NE's concerns. This matter and the conclusion of no AEOI were noted to be agreed in the revised SoCG [REP5-055] based on the revised documents submitted at DL4. However, the NE DL5 submission [REP5-066] stated that the agreement was subject to updates to the oLEMP to include the additional information provided within the NBBMS (most recently provided as [REP4-029]), and the oLEMP being secured in the dDCO for at least the operational lifetime of the proposed development.	
3.3.4	Mitigation measures for potential loss (and disturbance) of FLL – construction and operation	NE considered ([RR-023] NE2) that insufficient detail had been provided on the long-term management and monitoring responsibilities of mitigation areas. The applicant [REP1-043] [REP1-057], and in an updated HRA Report [REP1-010] and oLEMP [REP1-034] stated additional detail on monitoring arrangements, including potential remedial strategies which would be applied if habitats are found to be in sub-standard condition or if surveyed bird numbers fall below the target level. The ExA also sought clarity on how the proposed mitigation of the cessation of arable farming and implementation of “adaptive farming methods” in area M15 was secured and monitored ([PD-010] Q2.0.49). The applicant [REP2-087] confirmed that the description of the management and monitoring measures was included in the oLEMP [REP1-034], which was secured by the dDCO. NE ([REP3-075], NE1a) confirmed that its outstanding concerns were in relation to the provision of the timings and duration of management techniques, and requested	This matter is considered to be resolved pending the mitigation document updates as discussed in NE1/ NE1a in entry 3.3.3 above.

ID	Issue Summary	Details of issue	ExA observation/ question
		that NE are consulted on monitoring reports and the detail of remedial measures. NE also recommended that any oLEMP updates should be included in the NBBMS. The applicant provided further supporting information on management, monitoring and remedial measures in an updated oLEMP [REP4-055]. Within the updated SoCG with NE [REP5-055], and in response to NE's second written question responses [REP5-041], the applicant provided a summary of all relevant document updates submitted to the examination and how these were proposed to address NE's concerns. This submission also detailed the provision of pre-construction monitoring and how this would be used to inform the mitigation design, and provided additional information on possible remedial interventions. This matter and the conclusion of no AEoI were noted to be agreed in the NE DL5 submission [REP5-066] and revised SoCG [REP5-055] pending the updates to the oLEMP required by NE1a.	
3.3.5	Mitigation measures for potential loss (and disturbance) of FLL – construction and operation	NE considered ([RR-023] NE3) that insufficient detail had been provided on the proximity of mitigation areas to existing wind turbines, as this may introduce displacement and collision risk due to the mitigation areas being less than recommended distance from the turbines (600m). The applicant [REP1-043] [REP1-057] stated that the majority of mitigation areas are located beyond 600m of any turbines, and as such there would be sufficient mitigation land beyond this distance, with reference to the bird day calculations in addition to the use of ecological knowledge of the carrying capacity of different habitat types. The areas beyond 600m were provided in summary tables in the HRA Report [REP1-010], NBBMS [REP1-019] and oLEMP [REP1-034]). NE requested further information from the applicant to support its position that both the bird day calculations and ecological experience have been used to design the mitigation measures [REP2-095]. At DL5, the applicant provided confirmation within the SoCG [REP5-055] that the existing wind turbines (and other vertical structures) were considered within the bird	This matter is considered to be resolved pending the mitigation document updates as discussed in NE1/ NE1a in entry 3.3.3 above.

ID	Issue Summary	Details of issue	ExA observation/ question
		day calculations, and that surrounding land outside of the order limits is not relied upon as mitigation. This matter and the conclusion of no AEol were noted to be agreed in the NE DL5 submission [REP5-066] and revised SoCG [REP5-055] pending the updates to the oLEMP required by NE1a.	
3.3.6	Mitigation measures for potential loss (and disturbance) of FLL – construction and operation	NE considered ([RR-023] NE6) that insufficient detail had been provided on whether the proposed mitigation of scrapes/ ephemeral pools were deliverable due to uncertainty over the current ground conditions, hydrological and drainage regime. The applicant [REP1-043] [REP1-057] and in an updated HRA Report [REP1-010], NBBMS [REP1-019] and oLEMP [REP1-034] provided information on the deliverability of the mitigation, and alternatives in the event of an inability to construct or failure during operation after monitoring. Further information on scrape location and design was included within the updated HRA Report [REP2-010] and SoCG with NE [REP2-095]; NE confirmed ([REP3-075], NE1a) that its concern related to ensuring a sufficient water level in scrapes in relation to the existing ground conditions so as to be suitable for the target species. The applicant provided further information to support the design of the proposed scrapes in an updated oLEMP [REP4-055] and at DL5 [REP5-041] [REP5-055] to include confirmation of the monitoring and management of the scrapes to ensure sufficient water retention and habitat suitability for foraging waders. This matter and the conclusion of no AEol were noted to be agreed in the NE DL5 submission [REP5-066] and revised SoCG [REP5-055] pending the updates to the oLEMP required by NE1a.	This matter is considered to be resolved pending the mitigation document updates as discussed in NE1/ NE1a in entry 3.3.3 above.
3.3.7	Mitigation measures for potential loss (and disturbance)	NE considered ([RR-023] NE5) that the new permissive route in mitigation parcel M1(A), was not proposed to be fenced off as it was located on common land, which NE considered may introduce recreational disturbance. The applicant [REP1-043] [REP1-057] stated that it considered that recreational disturbance had been adequately considered within the HRA Report [REP1-010],	This matter (NE11a) is considered to be a “yellow” issue on the NE

ID	Issue Summary	Details of issue	ExA observation/ question
	of FLL – operation only	and that the mitigation strategy as a whole does not rely on any single parcel and should instead be considered as a whole based on supporting bird day calculations. However, the applicant acknowledged [REP2-095] that it would make changes to the design of the affected mitigation area, which were formalised in change request 1 [CR1-001] to [CR1-026], which amended the scheme design to exclude common land, enabling the applicant to reroute and fence off the permissive path. NE confirmed ([REP3-075], NE1a) that its outstanding concerns related to the provision of the specific design of the fencing, screening, routing and educational signage of the permissive path. The applicant provided supporting information on the permissive footpath design in an updated oLEMP [REP4-055], with further specific design details in relation to fencing provided at DL5 [REP5-041] [REP5-055]. This matter was noted to be agreed in the NE DL5 submission [REP5-066] and revised SoCG [REP5-055] pending the updates to the oLEMP required by NE1a. NE [REP5-066] also provided comments under NE11a, which was for the purposes of separating the previous entry NE11 into matters relating to management of parcel M1(A) and the fencing design, from management of hydrological conditions (NE11b). NE confirmed that whilst it agreed with the conclusions of no AEoI, it advised the applicant to consider the potential for the path be re-routed to the edge of the parcel. Whilst the updated SoCG [REP5-055] considers this is under discussion, the NE DL5 submission [REP5-066] considers this to be a yellow issue.	submissions which NE do not consider would make a material difference to the conclusions of no AEoI. NE5 is considered to be resolved pending the mitigation document updates as discussed in NE1/ NE1a in entry 3.3.3 above.

Table 3.4: Thorne Moor SPA - Issues raised in the examination to date by the ExA and IPs in relation to the applicant's assessment of effects on integrity (alone and in-combination)

ID	Issue Summary	Details of issue	ExA observation/ question
3.4.1	Potential disturbance to FLL from noise and visual impacts – construction only	NE considered ([RR-023] NE9) that insufficient detail had been provided on mitigation measures required as a result of the proximity of construction works. This concern was predominately due to NE requesting clarity over the seasonal restrictions of works in nightjar breeding season, uncertainty over the location of construction compounds, and the proposed buffer zones between the designated sites and areas of construction being less than the 150m recommended. The applicant [REP1-043] [REP1-057] confirmed in an updated HRA Report [REP1-010], NBBMS (in relation to foraging habitat) [REP1-019] and oECMP [REP1-032] a single approach to buffer zone distances and locations across the order limits, and provided confirmation of seasonal (and daily working hours) restrictions close to the SPA boundary and additional noise and visual mitigation measures. The applicant gave a further assessment of potential impacts within the SoCG with NE [REP2-095] to confirm that no additional specific mitigation measures were required for impacts to the SPA. NE confirmed [REP3-075] that its outstanding concerns related to a requirement to utilise average (L_{aeq}) and maximum/ sudden (L_{Amax}) noise levels, as both can affect the behaviour of qualifying features. NE also requested further clarity on how the ECoW would decide if the threshold for additional mitigation had been reached. Whilst NE's position at DL4 was that this matter was still under discussion, the applicant provided an updated HRA Report [REP4-011], oECMP [REP4-053] and oLEMP [REP4-055] to confirm the thresholds and other monitoring responsibilities of the ECoW, seasonal restrictions, confirmation of the buffer zones, and to state that no works would be permitted within the sites.	This matter is considered to be resolved

ID	Issue Summary	Details of issue	ExA observation/ question
		NE confirmed [REP5-066] that the information in the updated HRA Report [REP4-011] and information regarding the role of the ECoW was sufficient to conclude no AEoI and that this matter and the conclusion of no AEoI were agreed (as also confirmed by the updated SoCG [REP5-055]).	
3.4.2	Potential loss (and disturbance) of FLL – construction and operation	NE considered ([RR-023] NE8) that insufficient detail had been provided on how mitigation measures for potential loss of FLL for nightjar had been specifically designed to be suitable given the foraging distances and behaviours of nightjar. The applicant [REP1-043] [REP1-057] and in an updated NBBMS [REP1-019] (in relation to foraging habitat) and oLEMP [REP1-034] responded to NE provide an updated green corridor design for foraging nightjar, with reference to additional buffers around retained ditches and hedgerows. The applicant also provided further updates to the HRA Report [REP2-010] and oLEMP [REP2-070] to include a new section on scheme design, and updates to mitigation measures for nightjar. These updates were further detailed in the applicant's response [REP2-087] to ([PD-010] Q2.0.28). NE confirmed [REP2-095] [REP2-105] that its main concern related to the size of retained/ installed margins along recorded nightjar flight routes. NE updated its position [REP3-075] to note that it welcomed a clarification from the applicant (by email) that most of the margins would be between 5 and 10m width, and that this information should be considered within the HRA Report to support the assessment conclusions. The applicant initially provided this detail in [REP3-046] in response to Q2.0.28 and later in updates to the text and figures of the HRA Report [REP4-011] and oLEMP [REP4-055] showing buffer zones, grass sward height and field margins. NE confirmed [REP5-066] that the additional information in the HRA Report [REP4-011] and oLEMP [REP4-055] were sufficient to conclude no AEoI and that this matter is agreed (as also confirmed by the updated SoCG REP5-055)).	This matter is considered to be resolved

ID	Issue Summary	Details of issue	ExA observation/question
3.4.3	Potential collision risk for nightjar using FLL - Operation	NE considered ([RR-023] NE8a) that the HRA Report [APP-028] had omitted mitigation measures for collision risk with solar panels during operation, due to nightjar mistaking the panel colours for waterbodies. NE requested further monitoring measures, including bird collision monitoring and recording the presence of carcasses. The applicant [REP1-043] [REP1-057] and in an updated oLEMP [REP1-034] responded to provide details requested by NE including consideration of nightjar flight height levels, how the panel design would avoid collision risk and how the overall mitigation design would benefit nightjar. NE provided a further series of recommended mitigation and monitoring measures related to panel appearance [REP2-095], and noted that its outstanding concerns were in relation to the provision of detail on the proposed remedial measures, where required, as a result of the proposed monitoring [REP3-075]. The applicant provided further updates to the oLEMP [REP4-055] to include updates on bird carcass monitoring and how this would inform remedial measures. NE acknowledged [REP5-066] the limited available evidence regarding collision risk for nightjar from solar panels. NE considered that, acknowledging this context, the additional information provided in the oLEMP sufficiently ruled out AEoI. However, NE reiterated the importance of monitoring and remedial measures for nightjar post-consent to validate this conclusion. NE stated that, subject to the additional assessment relating to collision risk in the SoCG [REP2-095] also being included in the HRA Report to support the overall conclusion of no AEoI, this matter was agreed (also confirmed by the updated SoCG REP5-055)).	RIESQ11 - To the applicant – Please provide confirmation of when the required updates to the HRA Report will be or have been submitted to the examination.
3.4.4	Potential disturbance to FLL from noise and visual	CDC raised similar issues to NE in relation to the assessment of impacts to, and requirement for mitigation for, the nightjar population of the SPA. In [REP1-062], CDC considered that it was not clear as to how the mitigation design was suitable for nightjar (NE8), as the habitat of open pastures was not appropriate. CDC also	RIESQ12: To CDC - Please provide your latest

ID	Issue Summary	Details of issue	ExA observation/question
	impacts – construction and operation	questioned the age of baseline survey data, and requested detail on how nightjar flight pathway tracking had informed the location and design of mitigation areas. The applicant provided further information to CDC [REP2-089] on the nightjar survey efforts, including use of flight data and agreement with NE. At ISH2, CDC [REP3-081] confirmed that its outstanding concerns related to the provision of the locations and nature of the mitigation either as habitats or functional features. The applicant provided details on this in [REP3-046] in response to Q2.0.28 and in updates to the text and figures of the HRA Report [REP4-011] and oLEMP [REP4-055] showing buffer zones, grass sward height and field margins, as detailed in response to CDC [REP4-065]. In [REP1-062], CDC considered that a seasonal exclusion to avoid nightjar breeding season should be considered (NE9), and in [RR-006] [REP1-050] [REP1-062], CDC considered that that the assessment of lighting impacts was limited in detail (NE10). No submissions in addition to those discussed at 3.4.1 and 3.4.2 above are noted for these matters. At DL5, CDC [REP5-058] confirmed that the additional drawings provided were acceptable, however, the overall issue of the assessment of impact to and mitigation for nightjar remained under discussion in the updated SoCG [REP5-047].	position on this matter and whether there are any implications for the conclusions on AEol? If there are remaining concerns, provide reasoning and clearly set out specific actions that, in your view, the applicant should take to resolve those concerns.

3.4 Summary of examination outcomes in relation to adverse effects on integrity

- 3.4.1 To date in the examination, several of the matters identified in tables 3.1 – 3.4 of this RIES in respect of disputed AEols remain unresolved. The ExA seeks responses from the applicant and ANCB, where indicated, to provide clarity on the outstanding matters.
- 3.4.2 The ExA's understanding of the applicant's and IPs/ the ANCB's current positions in relation to AEols is set out in tables A1.1 to A1.6 of annex 1 of this RIES.

4 CONCLUDING REMARKS

- 4.0.1 This RIES is based on information submitted throughout the examination by the applicant and IPs, up to DL5 (04 August 2026), in relation to potential effects on European sites. It should be read in conjunction with the examination documents referred to throughout.
- 4.0.2 The RIES has identified gaps in the ExA's understanding of IPs' positions on Habitats Regulations and comments on the RIES will be of great value to the ExA in order to support a robust and thorough recommendation to the SoS. In particular, the ExA seeks:
- Responses to the questions identified in sections 1 to 4 of this RIES.
 - Confirmation of whether the ExA's understanding of screening and adverse effects conclusions at point of RIES publication (tables A.1.1 to A1.6 in annex 1) is correct.
- 4.0.3 Comments on the RIES must be submitted by DL6 (22 September 2026).

ANNEX 1 EXA'S UNDERSTANDING OF POSITION AT POINT OF RIES PUBLICATION

- 4.0.4 The tables in this annex summarise the ExA's understanding of the applicant's screening exercise and assessment of effects on integrity, and agreement with the relevant ANCB/ IPs at time of publication of this RIES.

Key to tables:

C = Construction

O = Operation

D = Decommissioning

✓ = LSE or AEol cannot be excluded

X = LSE or AEol can be excluded

Y = Yes

N = No

? = Unclear

n/a = not applicable

Table A1.1: Thorne and Hatfield Moors SPA

Feature	Potential impact	LSE? – From table 6-3 of HRA Report		AEol? – From table 7-2 of HRA Report	
		Applicant's conclusion	Agreement with ANCB/ IPs?	Applicant's conclusion	Agreement with ANCB/ IPs?
Breeding nightjar	Loss of potential foraging habitat (C, D)	✓	NE: Yes [RR-023] CDC: Yes [REP1-062]	X	NE: Yes [REP5-066] NE0, NE8 CDC: No [REP5-066]
	Disturbance from noise, artificial lighting, and visual impacts (C, O, D)	✓	NE: Yes [RR-023] CDC: Yes [REP1-062]	X	NE: Yes [REP5-066] NE8, NE9, NE10* CDC: No [REP5-066]
	Degradation of foraging/ roosting habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D)	✓	NE: Yes [RR-023]	X	NE: Yes [REP5-066] NE14, NE15, NE16, NE17, NE18
	Degradation of foraging/ roosting habitat - Impacts to air quality, including dust and vehicle emissions (C, O, D)	✓	NE: Yes – [RR-023]	X	NE: Yes – [RR-023] (no matters raised by NE)
	In-combination effects (C, O, D)	✓	NE: Yes – [RR-023]	X	NE: Yes [REP5-066] NE19
	Collision risk with solar panels (O)	N/A	N/A	N/A	NE: Yes [REP5-066] NE8a*

* Pending minor clarifications to relevant documentation as requested by NE

Table A1.2: Thorne Moor SAC

Feature	Potential impact	LSE? – From table 6-3 of HRA Report		AEol? – From table 7-2 of HRA Report	
		Applicant's conclusion	Agreement with ANCB (NE)?	Applicant's conclusion	Agreement with ANCB (NE)?
Degraded bogs still capable of regeneration	Degradation of habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE11b, NE14, NE15, NE16, NE17, NE18
	Degradation of habitat - Impacts to air quality, including dust and vehicle emissions (C, O, D)	✓	Yes [RR-023]	X	Yes [REP3-075] NE12* N/A – [REP3-075] NE13
	In-combination effects (C,O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE19
	Loss of habitat (C, D)	N/A	N/A	N/A	Yes [REP5-066] NE0

* Pending minor clarifications to relevant documentation as requested by NE

Table A1.3: Hatfield Moor SAC

Feature	Potential impact	LSE? – From table 6-3 of HRA Report		AEol? – From table 7-2 of HRA Report	
		Applicant's conclusion	Agreement with ANCB (NE)?	Applicant's conclusion	Agreement with ANCB (NE)?
Degraded raised bogs still capable of natural regeneration	Degradation of habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE14, NE15, NE16, NE17, NE18
	Degradation of habitat - Impacts to air quality, including dust and vehicle emissions (C, O, D)	✓	Yes [RR-023]	X	Yes [REP3-075] NE12* N/A [REP3-075] NE13
	In-combination effects (C, O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE19

* Pending minor clarifications to relevant documentation as requested by NE

Table A1.4: Humber Estuary SAC

Feature	Potential impact	LSE? – From table 6-3 of HRA Report		AEol? – From table 7-2 of HRA Report	
		Applicant's conclusion	Agreement with ANCB (NE)?	Applicant's conclusion	Agreement with ANCB (NE)?
Annex I habitats • Atlantic salt meadows • Coastal lagoons • Dunes with hippopha rhamnoides • Embryonic shifting dunes • Estuaries • Fixed coastal dunes with herbaceous vegetation (grey dunes) • Mudflats and sandflats not covered by seawater at low tide • Salicornia and other annuals colonizing mud and sand	Degradation of habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE14, NE15, NE16, NE17, NE18
	Degradation of habitat - Impacts to air quality including dust and vehicle emissions (C, O, D)	✓	Yes [RR-023] (no issues raised by NE)	X	Yes [RR-023] (no issues raised by NE)
	In-combination effects (C, O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE19

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Feature	Potential impact	LSE? – From table 6-3 of HRA Report		AEol? – From table 7-2 of HRA Report	
		Applicant's conclusion	Agreement with ANCB (NE)?	Applicant's conclusion	Agreement with ANCB (NE)?
- Sandbanks which are slightly covered by sea water all the time - Shifting dunes along the shoreline with <i>Ammophila arenaria</i> (white dunes) Annex II species - sea lamprey - river lamprey					
Annex II species: grey seal	None	X	Yes [RR-023] (no matters raised by NE)	N/A	N/A

* Pending minor clarifications to relevant documentation as requested by NE

Table A1.5: Humber Estuary Ramsar site

Feature	Potential impact	LSE? – From table 6-3 of HRA Report		AEol? – From table 7-2 of HRA Report	
		Applicant's conclusion	Agreement with ANCB?	Applicant's conclusion	Agreement with ANCB?
Criterion 1 – estuarine habitat	Degradation of habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE14, NE15, NE16, NE17, NE18
	Degradation of habitat - Impacts to air quality, including dust and vehicle emissions (C, O, D)	✓	Yes [RR-023] (no matters raised by NE)	X	Yes [RR-023] (no issues raised by NE)
	In-combination effects (C, O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE19
Criterion 3 • breeding colony of grey seals • breeding natterjack toad	None	X	Yes [RR-023] (no matters raised by NE)	N/A	N/A
Criterion 5 – waterfowl assemblage in non-breeding season	Loss of FLL (C, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE1a*, NE7*
	Temporary disturbance to foraging/roosting habitat (FLL) from noise, artificial lighting, and visual impacts (C, O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE1a*, NE7*

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Feature	Potential impact	LSE? – From table 6-3 of HRA Report		AEol? – From table 7-2 of HRA Report	
		Applicant's conclusion	Agreement with ANCB?	Applicant's conclusion	Agreement with ANCB?
	Degradation of foraging/ roosting habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D)	N/A	N/A	N/A	Yes [REP5-066] NE14, NE15, NE16, NE17, NE18
	In-combination effects (C, O, D)	✓	Yes – [RR-023]	X	Yes [REP5-066] NE19
Criterion 6 – golden plover (passage and wintering)	Temporary disturbance to foraging/ roosting habitat from noise, artificial lighting, and visual impacts (C, O, D)	✓	Yes – [RR-023]	X	Yes [REP5-066] NE1a*, NE7*
	Degradation of foraging/ roosting habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D)	N/A	N/A	N/A	Yes – [REP5-066] NE14, NE15, NE16, NE17, NE18
	In-combination effects (C, O, D)	✓	Yes – [RR-023]	X	Yes – [REP5-066] NE19
Criterion 6: - bar-tailed godwit (wintering) - black-tailed godwit	None	X	Yes – [RR-023] (no matters raised by NE, as confirmed by REP2-105 stating concerns	N/A	N/A

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Feature	Potential impact	LSE? – From table 6-3 of HRA Report		AEol? – From table 7-2 of HRA Report	
		Applicant's conclusion	Agreement with ANCB?	Applicant's conclusion	Agreement with ANCB?
(passage and wintering) • dunlin (passage and wintering) • red knot (passage and wintering) • redshank (passage and wintering) • shelduck (wintering)			related to golden plover only)		
Criterion 8 – migration route for river lamprey and sea lamprey	Degradation of habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D)	✓	Yes – [RR-023]	X	Yes [REP5-066] NE14, NE15, NE16, NE17, NE18
	Degradation of habitat - Impacts to air quality, including dust and vehicle emissions (C, O, D)	✓	Yes – [RR-023] (no matters raised by NE)	X	Yes [RR-023] (no issues raised by NE)
	In-combination effects	✓	Yes – [RR-023]	X	Yes [REP5-066] NE19

* Pending minor clarifications to relevant documentation as requested by NE

Table A1.6: Humber Estuary SPA

Feature	Potential impact	LSE? – From Table 6-3 of HRA Report		AEol? – From Table 7-2 of HRA Report	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB?	Applicant's conclusion (alone or in combination)	Agreement with ANCB?
Wintering features: • avocet • bar-tailed godwit • bittern • black-tailed godwit • dunlin • grey plover • hen harrier • knot • redshank • ringed plover • sanderling • shelduck	None	X	Yes [RR-023] (no matters raised by NE, as confirmed by REP2-105 stating concerns relating to mallard, lapwing, golden plover, greylag goose, pink footed goose only)	N/A	N/A
Wintering features: • golden plover	Temporary disturbance to foraging/ roosting habitat from noise, artificial lighting, and	✓	Yes [RR-023]	X	Yes [REP5-066] NE1a*, NE7*, NE10*, NE11a

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Feature	Potential impact	LSE? – From Table 6-3 of HRA Report		AEol? – From Table 7-2 of HRA Report	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB?	Applicant's conclusion (alone or in combination)	Agreement with ANCB?
	visual impacts (C, O, D)				
	Degradation of foraging/ roosting habitat – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D)	N/A	N/A	N/A	Yes [REP5-066] NE14, NE15, NE16, NE17, NE18
	In combination effects (C, O, D)	✓	Yes – [RR-023]	X	Yes [REP5-066] NE19
Assemblage feature component species - wintering • greylag goose • lapwing • mallard	Loss of FLL (C, D)	✓	Yes – [RR-023]	X	Yes [REP5-066] NE1a*, NE7*, NE10*, NE11a
	Temporary disturbance to foraging/ roosting habitat (FLL) from noise, artificial lighting, and visual impacts (C, O, D)	✓	Yes – [RR-023]	X	Yes [REP5-066] NE1a*, NE7*, NE10*, NE11a

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Feature	Potential impact	LSE? – From Table 6-3 of HRA Report		AEol? – From Table 7-2 of HRA Report	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB?	Applicant's conclusion (alone or in combination)	Agreement with ANCB?
pink-footed goose	Degradation of foraging/ roosting habitat (FLL) – Impacts to water quality and quantity, including polluting incidences, run-off and changes to the hydrological regime (C, O, D)	N/A	N/A	N/A	Yes [REP5-066] NE14, NE15, NE16, NE17, NE18
	In combination effects (C, O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE19
Assemblage feature component species - wintering golden plover	Temporary disturbance to foraging/ roosting habitat from noise, artificial lighting, and visual impacts (C, O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE1a*, NE7*, NE10*, NE11a
	Degradation of foraging/ roosting habitat – Impacts to water quality and quantity, including polluting incidences,	N/A	N/A	N/A	Yes [REP5-066] NE14, NE15, NE16, NE17, NE18

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Feature	Potential impact	LSE? – From Table 6-3 of HRA Report		AEol? – From Table 7-2 of HRA Report	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB?	Applicant's conclusion (alone or in combination)	Agreement with ANCB?
	run-off and changes to the hydrological regime (C, O, D)				
	In combination effects (C, O, D)	✓	Yes [RR-023]	X	Yes [REP5-066] NE19
Assemblage feature component species - wintering • avocet • bar-tailed godwit • bittern • black-tailed godwit • crane • curlew • dark-bellied brent goose • dunlin • goldeneye	None	X	Yes [RR-023] (no matters raised by NE, as confirmed by REP2-105 stating concerns relating to mallard, lapwing, golden plover, greylag goose, pink footed goose only)	N/A	N/A

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Feature	Potential impact	LSE? – From Table 6-3 of HRA Report		AEol? – From Table 7-2 of HRA Report	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB?	Applicant's conclusion (alone or in combination)	Agreement with ANCB?
• green sandpiper • greenshank • grey plover • knot • little egret • oystercatcher • pochard • redshank • ringed plover • ruff • sanderling • scaup • shelduck • shoveler • teal • turnstone • whimbrel • wigeon					

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Feature	Potential impact	LSE? – From Table 6-3 of HRA Report		AEol? – From Table 7-2 of HRA Report	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB?	Applicant's conclusion (alone or in combination)	Agreement with ANCB?
Passage features: • Black-tailed godwit • dunlin • knot • redshank • ruff	None	X	Yes [RR-023] (no matters raised by NE, as confirmed by REP2-105 stating concerns relating to mallard, lapwing, golden plover, greylag goose, pink footed goose only)	N/A	N/A
Breeding features: • avocet • bittern • little tern • marsh harrier	None	X	Ye [RR-023] (no matters raised by NE, as confirmed by REP2-105 stating concerns relating to mallard, lapwing, golden plover, greylag goose, pink footed goose only)	N/A	N/A

* Pending minor clarifications to relevant documentation as requested by NE