



Planning
Inspectorate

REPORT on the IMPLICATIONS for EUROPEAN SITES

Proposed Dean Moor Solar Farm

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

Planning Inspectorate Reference: EN010155

18 November 2025

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1 INTRODUCTION

1.1 Background

1.1.1 FVS Dean Moor Limited ('the applicant') has applied for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA2008) for the proposed Dean Moor 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 4 (DL4) of the examination (28 October 2025). 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/published-documents/EN010155-000022-Dean%20Moor%20Examination%20Library.pdf>

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 and 'European Marine Sites' defined in The Offshore Marine Habitats and Species 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), in this case Natural England (NE), are 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 document(s):
- Environmental Statement: Appendix 8.7 – Shadow Habitats Regulation Assessment [APP-156]
- 1.2.2 The HRA Report concluded that adverse effects on the integrity of all European sites could be excluded.
- 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 RIES questions

- 1.3.1 This RIES contains questions predominantly targeted at the applicant and NE, which are drafted in **blue, bold text**.
- 1.3.2 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.
- 1.3.3 In responding to the questions, please refer to the ID number, or for the questions in tables, please refer to the ID number in the first column.
- 1.3.4 Comments on the RIES are timetabled for DL6 (22 December 2025).

1.4 HRA Matters Considered During the Examination

- 1.4.1 The examination to date has focussed on the following matters:
- Whether the 10km search area applied is adequate for identifying all European sites and/or qualifying interest features.
 - Whether the applicant had identified and scoped in all relevant impact pathways.
 - Whether the mitigation measures proposed were relied upon to reach a conclusion of no LSE.
 - The conservation statuses of the River Derwent and Bassenthwaite Lake (RD&BL) SAC and Solway Firth Special Protection Area (SPA).

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 applicant identified European sites within 10km of the order limits.

Sites within the UK National Site Network (NSN)

- 2.1.3 The applicant's HRA Report [APP-156] identified five European sites within the UK National Site Network within the 10km zone of influence. These are listed in table 3.1 of the HRA Report and are as detailed in table 2.1 below.

Table 2.1: European sites in the UK NSN identified in the applicant's HRA Report [APP-156]

Name of European site	Distance from proposed development (km)
RD&BL SAC	1.2km
Solway Firth SPA	5km
River Ehen SAC	6.1km
Lake District High Fells SAC	8km
North Pennine and Dales Meadows SAC	8.9km

- 2.1.4 The locations of these sites relative to the proposed development are depicted on figure 3.1 of the HRA Report [APP-156].
- 2.1.5 The ExA questioned (Q1.0.15 [PD-007]) the appropriateness of the 10km search area applied to identify European sites for inclusion within the assessment, noting specifically that at several points in the HRA Report (including paragraph 4.3.14 and Appendix C Screening Matrix for Solway Firth SPA) the applicant made reference to consultation advice from NE which appeared to suggest that the site of the proposed development could be functionally linked to the Morecambe Bay and Duddon Estuary SPA (which was not scoped into the assessment). This point was also raised by Cumberland Council in its local impact report [REP2-058].
- 2.1.6 The applicant [REP2-010][REP3-008] explained that the consultation advice from NE indicated that herring gull which nested on a rooftop colony in Lillyhall was functionally linked to the Morecambe Bay and Duddon Estuary SPA. However, the applicant argued that there was no suggestion by NE that the birds recorded at the site of the proposed development were linked to the Morecambe Bay and Duddon Estuary SPA.

- 2.1.7 NE [REP2-060] confirmed that in its view, the 10km zone of influence adequately addresses the potential impacts of the development on European sites and their qualifying interest features, including areas of functionally linked land used by mobile species, and is suitably precautionary. Specifically regarding Morecambe Bay & Duddon Estuary SPA, NE [REP2-060] advised that as herring gull are a highly mobile species with a large foraging range up to 50km from their roosting colonies, inclusion of SPAs within a radius greater than 10km to assess impacts on this species is not reasonable.
- 2.1.8 NE agreed [REP2-060] that all relevant European sites and or European site features that could be affected by the project had been identified by the applicant.
- 2.1.9 Although Cumberland Council [REP2-058] shared the ExA's concerns about Morecambe Bay & Duddon Estuary SPA, it confirmed (response to Q2.3.3 [REP4-030], [REP3-019]) that it was satisfied that the sHRA is sound and that Cumberland Council will adopt the position of NE with regard to LSE on European Sites.
- 2.1.10 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 Section 3 of the HRA Report detailed the potential impacts from the proposed development, along with the potential geographical extent of effects. Table 3.3 presents an initial scoping exercise whereby the applicant considered whether there were any conceivable impact pathways by which the proposed development could give rise to threats/ pressures for which the European sites are identified to be at risk. This concluded that there were no conceivable impact scenarios identified by which any of the identified threats / pressures could arise (table 3.3 and paragraph 4.1.2 of the HRA Report) to:
- River Ehen SAC – designated for the presence of freshwater pearl mussel and Atlantic salmon;
 - Lake District High Fells SAC - designated for a range of upland habitats including heathland, tarns (waterbodies), grassland, bogs, scree, woodland, and tall herb communities;
 - North Pennine Dales Meadows SAC - designated due to the presence of mountain hay meadows and *Molinia* meadows.
- 2.2.2 Conceivable pathways were identified for RD&BL SAC and the Solway Firth SPA. These are assessed in section 4 of the HRA Report.

Table 2.2 Pathways for LSE assessed by the applicant

European site	Feature	LSE pathway
RD&BL SAC	Otter, Atlantic salmon, river lamprey, sea lamprey, brook	Pollution to groundwater

European site	Feature	LSE pathway
	lamprey, marsh fritillary and floating water-plantain	Siltation Change in species distribution
Solway Firth SPA	Article 4.1 qualifying species Article 4.2 qualifying species Article 4.2 qualifying species (passage) Article 4.2 non-breeding assemblage	Other ecosystem modifications (impacts to functionally linked land)

- 2.2.3 The HRA Report assessed the potential impacts during construction and operation and maintenance; it did not assess impacts during the decommissioning phase.

RIES.Q.1 (to the applicant): the HRA Report does not consider the decommissioning phase. What is the potential for effects of the decommissioning phase on European sites?

- 2.2.4 No additional impact pathways have been identified by IPs for inclusion within the assessment in the examination to date.

In-stream works

- 2.2.5 The Outline Construction Environment Management Plan (oCEMP) states that no in-stream or bank-face works within the Ordinary Watercourses on site are considered likely to be necessary, and any such works could only be undertaken in accordance with an Ordinary Watercourse Consent permit from Cumberland Council. The oCEMP states that if in-stream works were to include damming or over-pumping of watercourses, a Risk Assessment and Method Statement (RAMS) would be produced to include mitigation for managing in-stream works, namely:

- scheduling in-channel works during dry periods to minimise disturbance to fish species;
- a watching brief;
- fish rescues and translocation prior to works; and
- fish screens on all pumps to prevent entrainment.

- 2.2.6 The Environment Agency [RR-017] also noted that the construction activities associated with watercourses (including temporarily damming and over pumping of watercourses) could damage habitat, leave fish stranded and entrain fish into pumps (including Atlantic salmon and lamprey species).

RIES.Q.2 (to the applicant): the HRA report assumes an absence of in-stream and bankside works as the basis for avoiding any impacts to aquatic species including fish and plants (paragraph 5.2.12). Given the

potential (albeit unlikely) for in-stream works to occur (and the resultant mitigation secured in the oCEMP) explain further why there is no risk to the qualifying features of the RD&BL SAC qualifying features, or provide an assessment of LSE from this impact pathway and the information to inform an appropriate assessment.

Invasive non-native species

- 2.2.7 The oCEMP also secures the production of a Biosecurity Management Plan which would provide further detail on how materials being brought to Site will be screened for contaminated soil and that all machinery is clean upon arrival and has not come into contact with invasive non-native species (INNS).
- 2.2.8 The HRA Report (table 3.3) scopes out impacts from INNS as a plausible pathway for effect on the basis of the nature of the development and intervening distance to European sites.

RIES.Q.3 (to the applicant): Given the need for a Biosecurity Management Plan in the oCEMP, explain further why there is no risk to the qualifying features of the RD&BL SAC qualifying features, or provide an assessment of LSE from this impact pathway and the information to inform an appropriate assessment.

2.3 In-combination effects

- 2.3.1 Section 2.4 of the HRA Report [APP-156] detailed the applicant's approach to assessing in-combination effects. The projects included in the in-combination assessment were detailed in sections 4 and 5 of the HRA Report [APP-156].
- 2.3.2 An additional 31 cumulative schemes were highlighted by Cumberland Council during the examination [REP2-059]. The applicant provided a Cumulative Assessment Technical Note (Appendix A [REP3-008]) which detailed the schemes, their locations, and an assessment of likely significant cumulative effects against the additional schemes for each environmental aspect, including biodiversity. Section 2.3 of the note [REP3-008] concludes that due to the nature of the projects and the distance between them and the proposed development, significant cumulative effects on biodiversity are not anticipated and there would be no change to the HRA Report.
- 2.3.3 The shared position set out in the (currently unsigned) SOCG with NE is that it is agreed that the assessment of in-combination effects has been appropriately considered based on the information that is publicly available from other known potential schemes, including the Lostrigg Solar project [REP4-011].

2.4 The applicant's assessment

- 2.4.1 The applicant's conclusions in respect of screening are presented in sections 4.4 and 6.1 of the HRA Report [APP-156]. They are summarised in the applicant's screening matrices in section 4.2 of the HRA Report [APP-156], however the ExA (Q2.1.4 [PD-007]) highlighted a discrepancy between the screening matrix for RD&BL SAC and the assessment in section 5 of the HRA Report. The applicant [REP4-004] acknowledged the discrepancy and

confirmed that table 4.2 and appendix C should identify LSE for 'changes in species distributions' for construction and operation for the otter, Atlantic salmon and lamprey species, and that no LSE have been identified for other species (alone and in combination, for both construction and operation).

RIES.Q.4 (to the applicant): Update table 4.2 and appendix C of the HRA Report to rectify the identified discrepancy described above.

Sites for which the applicant concluded no LSE on all qualifying features

- 2.4.2 The applicant concluded that the proposed development would not have any conceivable pathways of impact on the following European sites that were scoped out of the assessment:
- River Ehen SAC
 - Lake District High Fells SAC
 - North Pennine Dales Meadows SAC
- 2.4.3 As these sites have been scoped out, strictly speaking they were not screened for LSE by the applicant (see section 4 of the HRA Report).
- 2.4.4 Nevertheless, NE confirmed it agreed with the applicant's conclusion of no LSEs in respect of the above European sites [REP2-060]. However, Cumberland Council [REP2-058] requested further justification (see section 2.5).

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

- 2.4.5 The applicant concluded 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:
- RD&BL SAC
 - Solway Firth SPA
- 2.4.6 The qualifying features and LSE pathways screened in by the applicant are detailed in section 4 of the HRA Report [APP-156] and in its screening matrices [APP-156] (notwithstanding the error noted in paragraph 2.4.1 above).
- 2.4.7 The applicant's decision to exclude certain LSE impact pathways were disputed by Cumberland Council during examination. See section 2.5 of this RIES for further details.

2.5 Examination matters

- 2.5.1 NE raised no issues with the applicant screening assessment [RR-009] [REP2-060].
- 2.5.2 Cumberland Council raised a series of concerns with the HRA screening in its Local Impact Report [REP2-058]. These concerns related to:

- requesting further detail on the distances and any potential hydrological connections between the application site to Lake District High Fells SAC and North Pennine Dales Meadows SAC.
- seeking clarification over why various pathways had been scoped out, including:
 - pollution effects to RD&BL SAC, River Ehen SAC, Lake District High Fells SAC and North Pennine Dales Meadows SAC;
 - human induced changes in hydraulic conditions to RD&BL SAC and River Ehen SAC;
 - siltation impacts to River Ehen SAC, North Pennine Dales Meadows SAC and Lake District High Fells SAC;
 - surface water pollution impacts to RD&BL SAC;
 - marine water pollution to Solway Firth SPA;
 - increase in problematic native species at the Lake District High Fells SAC; and
 - modification of cultivation practices, mowing / cutting of grassland, fertilisation to North Pennine Dales Meadows SAC.
- seeking clarification on how the differences between construction and operational phase impacts had been assessed, and what projects or plans have been scoped into the in-combination assessment.
- querying the applicant's figures for qualifying features recorded on the site in relation to Solway Firth SPA gull populations.

2.5.3 The applicant provided a response to these issues at DL3 [REP3-008]. The ExA requested that Cumberland Council respond to the applicant's response to the local impact report, to which the Council stated [REP4-030] that it had had further discussions with the applicant, the outcomes of which were reflected in the draft SOCG [REP3-019]. The draft SOCG (CC.EC.4) [REP3-019]) states that the Council considers that:

"following discussions with the applicant and a review of NE feedback on the sHRA the Council is satisfied that the sHRA is sound and it is agreed that the Council will adopt the position of NE with regard to LSE on European Sites."

In addition, "the sHRA has appropriately accounted for in-combination impacts associated with the withdrawn Lostrigg Solar scheme on the Site's northern boundary".

Mitigation

2.5.4 The ExA (Q1.0.16 [PD-007]) noted that the HRA screening matrix for RD&BL SAC (Appendix C, footnotes a and b [APP-156]) described mitigation measures in the context of both screening out changes in species distribution during the construction phase, and screening out LSE caused by pollution,

siltation or changes in species distributions in the operational phase. The ExA sought clarification over whether the mitigation measures proposed were relied upon to reach the conclusion of no LSE and how this accorded with case law (CJEU People Over Wind and Sweetman v Coillte Teoranta (C-323/17)).

- 2.5.5 The applicant [REP2-010] argued that the mitigation measures include embedded mitigation; best practice, standard measures that would be in place irrespective of the presence of a European site, to comply with health and safety and environmental legislation. NE raised no concerns on this matter.

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 LSEs is set out in annex 1 table A.1 of this RIES.
- 2.6.2 The applicant has agreed during the examination that an LSE should be screened in for the RD&BL SAC and Solway Firth SPA (see table A.1 for features and pathways).

3 ADVERSE EFFECTS ON INTEGRITY

3.1 Conservation Objectives

- 3.1.1 The conservation objectives for both of the European sites for which a LSE was identified by the applicant at the point of the DCO application were included within the HRA Report [APP-156].
- 3.1.2 The ExA (Q1.0.17 [PD-007]) requested the conservation statuses of the RD&BL SAC and Solway Firth SPA. The applicant [REP2-010] provided the statuses of the sites of special scientific interest (SSSIs) which underpin the European sites.
- 3.1.3 For the RD&BL SAC, this was the Bassenthwaite Lake SSSI, Bassenthwaite Moss SSSI, and Buttermere SSSI. However, the statuses of Atlantic salmon, otter, river lamprey, sea lamprey and brook lamprey were not recorded. Floating water plantain is recorded to be in favourable status, and marsh fritillary in unfavourable-no change status.
- 3.1.4 For the Solway Firth SPA, this was the Upper Solway Flats and Marshes SSSI. Of the SSSI bird features, one was unfavourable-recovering (bar-tailed godwit) and the others did not have their status recorded (barnacle goose; curlew, dunlin, golden plover, knot, oystercatcher, pink-footed goose, redshank, sanderling, shelduck, turnstone, Whooper swan, wigeon).

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 section 5 of the HRA Report [APP-156].

Mitigation measures

- 3.2.2 The applicant's HRA Report identified mitigation measures in section 5 [APP-156]. 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.

3.3 Examination matters

- 3.3.1 NE confirmed it agreed with the applicant's conclusion of no AEol in respect of the above European sites [REP2-060].
- 3.3.2 Cumberland Council [REP2-058] argued that insufficient evidence had been provided on the usage of surrounding land by herring gulls to justify the

conclusion that in-combination loss of foraging habitat would not adversely affect the herring gull populations using the site and the neighbouring Lostrigg solar farm site, and that greater detail regarding herring gull presence at Lostrigg was required. The Council also challenged the argument that the herring gull were favouring the fields as a loafing area, noting that the assessment (paragraph 5.3.6) suggested that fields on site were in use by herring gulls due to abundances in resources as a result of agricultural practices (slurry spraying) but also after periods of high rainfall. In light of this, and given the location of the site and high likelihood of periods of high rainfall, the Council sought further justification that the site is only of value for loafing and not foraging.

- 3.3.3 The applicant [REP3-008] argued that it used professional judgement and experience to propose reasoning as to the pattern of flocks on the site. The applicant also noted that NE was satisfied that there are no issues from the proposed development in-itself, or cumulatively in combination with other developments.
- 3.3.4 Following further discussion with the applicant and review of NE's position, the Council confirmed that it considered the HRA Report was sound ((CC.EC.4) [REP3-019]).

4 CONCLUDING REMARKS

- 4.0.1 This RIES is based on information submitted throughout the examination by the applicants and IPs, up to D4 (28 October 2025), 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 impacts to European sites 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.
 - Confirmation whether the ExA's understanding of screening and adverse effects conclusions at point of RIES publication (table (A.1) in annex 1) is correct.
- 4.0.3 Comments on the RIES must be submitted for D6 (22 December 2025).

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 NE at time of publication of this RIES.

Key to tables:

C = Construction

O = Operation

D = Decommissioning

ü = LSE or AEoI cannot be excluded

X = LSE or AEoI can be excluded

Y = Yes

N = No

? = Unclear

n/a = not applicable

Table A.1: HRA Report conclusions and agreement with the NE

Note that the conclusions recorded in the table below apply to impacts from the proposed development alone and in combination, unless otherwise stated.

Feature	Potential impact (C and O unless otherwise stated)	LSE?		AEol?	
		Applicant’s conclusion (alone or in combination)	Agreement with NE?	Applicant’s conclusion (alone or in combination)	Agreement with NE?
Site: River Derwent and Bassenthwaite Lake SAC					
Otter Atlantic salmon River lamprey Brook lamprey Sea lamprey	Pollution to groundwater (point sources and diffuse sources)	Ü (construction phase only)	Y	X	Y
	Siltation	Ü (construction phase only)	Y	X	Y
	Changes in species distributions	Ü (construction phase only)	Y	X	Y
Marsh fritillary Floating water plantain	Pollution to groundwater (point sources and diffuse sources)	X	N/A	N/A	N/A
	Siltation	X	N/A	N/A	N/A

Feature	Potential impact (C and O unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with NE?	Applicant's conclusion (alone or in combination)	Agreement with NE?
	Changes in species distributions	X	N/A	N/A	N/A
Site: Solway Firth SPA					
Barnacle geese Whooper swan Bar-tailed godwit Golden plover Red-throated diver Northern pintail Pink-footed goose Greater scaup Knot Oystercatcher Curlew Redshank Ringed plover	Other ecosystem modifications (loss of functionally linked land)	X	N/A	N/A	N/A

Feature	Potential impact (C and O unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with NE?	Applicant's conclusion (alone or in combination)	Agreement with NE?
Internationally important assemblage of birds in the non-breeding season	Other ecosystem modifications (loss of functionally linked land)	Ü	Y	X	Y