



Planning  
Inspectorate

# **REPORT on the IMPLICATIONS for EUROPEAN SITES**

## **Proposed Peartree Hill Solar Farm**

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

Planning Inspectorate Reference: EN010157

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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 Peartree Hill 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 (31 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:
- [EN010157-000189-Peartree Hill Solar Farm - Examination Library.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 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) 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 its 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 comprised the following document:
- Habitats Regulation Assessment – Information to inform Appropriate Assessment (the HRA Report) [APP-145] and updated at D1 [APP-145], D2 [REP2-071] and D3 [REP3-014].
- 1.2.2 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 requests.
- 1.3.2 The applicant submitted a notification of proposed changes/ corrections (identified as Changes 1 and 2) to the application [AS-004]. This was followed by a subsequent formal change request (hereafter 'change request 1') at procedural deadline A comprising [PDA-001 to PDA-020]. [PDA-001] was accompanied by a summary of the changes which comprised:
- removal of a section of the proposed solar array from 'land area B' to reduce visual effects and use the land as environmental mitigation; and
  - removal of three plots from the order limits along Carr Lane (Weel) which were proposed for temporary possession.
- 1.3.3 Change request 1 [PDA-001] included an appraisal of the environmental effects of the proposed changes which stated that the HRA Report [APP-145] would remain unchanged as a result of the proposed changes/ corrections.
- 1.3.4 Change request 1 was accepted into the examination by the ExA [PD-007], concluding that the proposals would not be considered a material change.
- 1.3.5 The applicant submitted a second notification of proposed changes (identified as Changes 3 to 9) to the application [AS-015]. This was followed by a subsequent formal change request [REP2-046 to REP2-152] (hereafter 'change request 2') at D2.
- 1.3.6 [REP2-149] provided a summary of the changes which comprised:
- revised access from the western side of the A165 and across agricultural land;

- improved access to the grid connection cable route on Hull Road/ Williams way A1174;
  - improved access to the grid connection cable route on Long Lane;
  - improved access to the grid connection cable route on the approach to National Grid Creyke Beck substation;
  - additional bridge connection between fields C5 and C8;
  - alteration of the placement of the grid connection cable route in land to the north of the A1079 on the approach to National Grid Creyke Beck substation; and
  - alternative access route directly off the A1035 into land areas D and E and the removal of a proposed access from Meaux Lane.
- 1.3.7 Change request 2 [REP2-149] included an appraisal of the environmental effects of the proposed changes. An updated HRA Report [REP2-071] was provided to incorporate the relevant changes.
- 1.3.8 Change request 2 was accepted into the examination by the ExA [PD-011 and PD-012], concluding that the proposals would not be considered a material change.
- 1.3.9 The ExA's second written questions [PD-014] requested that NE confirm whether it agreed with the applicant's conclusions regarding the effects of the change request on European sites from all phases of the proposed development, including in-combination effects. NE [REP3-060] confirmed that it agreed that the changes did not substantially affect the conclusions of the assessments presented in the updated HRA Report [REP2-149] submitted at D2.
- 1.3.10 The applicant submitted a third notification of proposed changes (identified as Changes 10 to 13) to the application [AS-017]. This was followed by a subsequent formal change request [REP4-077] (hereafter 'change request 3') at D4.
- 1.3.11 [REP4-077] provided a summary of the changes which comprised:
- change to permissive path route around field D18;
  - removal of permissive path loop around field E6 and extension of permissive paths around E7 and E8;
  - moving the permissive paths that run through the proposed biodiversity mitigation areas to the edge of field D16;
  - realignment of the permissive path in field B2 to run closer to the eastern edge of this field;
  - moving permissive path at the north of field B8 closer to the northern edge of the field, to the edge of the proposed biodiversity mitigation area in this field;
  - moving permissive paths throughout land area F closer to the edges of the fields; and

- installation of post and wire fencing between permissive paths and ecological mitigation areas.
- 1.3.12 Change request 3 [REP4-077] included an appraisal of the environmental effects of the proposed changes and did not list the HRA Report [REP3-014] as a document which would be affected by the proposed changes.
- 1.3.13 Change request 3 was accepted into the examination by the ExA [PD-017], concluding that the proposals would not be considered a material change.
- 1.3.14 Relevant HRA matters arising from these change requests are detailed in section 3 of this RIES.

## 1.4 RIES questions

- 1.4.1 This RIES contains questions predominantly targeted at the applicant, ANCB and IPs 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. In responding to the questions, please refer to the ID number.
- 1.4.3 Comments on the RIES are timetabled for DL5 (28 November 2025).

## 1.5 HRA Matters Considered During the Examination

- 1.5.1 The examination to date has focussed on the following matters:
- the impact pathways considered in the applicant's screening of likely significant effects (LSEs);
  - the suitability of core mitigation areas in relation to the assessment of habitat suitability, the impact of permissive footpaths, hydrological suitability, bird days calculation and management of the mitigation areas;
  - the adequacy of the applicant's baseline data in relation to the Grid Connection Bird Survey Report and the need for further assessment in the context of the updated bird survey results;
  - the applicant's approach to assessing noise and visual disturbance impacts to functionally linked land (FLL);
  - the applicant's conclusions in relation to the order limits and adjacent area not constituting FLL for marsh harrier, a qualifying feature of the Humber Estuary SPA;
  - the adequacy of mitigation associated with disturbance impacts to river lamprey from horizontal directional drilling (HDD) and electromagnetic fields (EMF); and

- the adequacy of mitigation and assessment conclusions in relation to water quality impacts from bentonite breakout.

## 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 scope of the assessment is described within Section 4 of the HRA Report [APP-145]. The applicant identified European sites within 10km of the DCO boundary.

#### Sites within the UK National Site Network (NSN)

- 2.1.3 The applicant's HRA Report [APP-145] identified five European sites within the UK National Site Network for inclusion within the assessment. These are listed in table 4-1 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-145]**

Name of European site	Distance from proposed development (metres)
Hornsea Mere SPA	5,815m east
Humber Estuary SPA	8,500m south
Humber Estuary Ramsar site	8,500m south
Humber Estuary SAC	8,500m south
Greater Wash SPA	9,560m east

- 2.1.4 The locations of these sites relative to the proposed development are depicted on Figure 4.1 of the HRA Report [APP-145].
- 2.1.5 No additional UK European sites have been identified by IPs for inclusion within the assessment in the examination to date.
- 2.1.6 NE confirmed in [REP1-093] that other than the sites and features for which it had raised a specific concern within its RR [RR-012], it agreed with the LSE conclusions in the applicant's HRA Report [APP-145].

#### Non-UK sites

- 2.1.7 The applicant has not identified any potential impacts on European sites in other European Economic Area (EEA) States.
- 2.1.8 Only sites within the UK NSN are addressed in this RIES.



## 2.2 Potential impact pathways

- 2.2.1 Section 4.6 of the HRA Report [APP-145] detailed the potential impacts from the proposed development, along with the potential geographical extent of effects. Screening assessment tables 4-12 to 4-18 of the HRA Report listed the sites and qualifying features and the impact pathways which could affect them.
- 2.2.2 In its RR [RR-012], NE noted concerns over water quality impacts during construction and operation. The HRA Report was subsequently updated [REP1-015] to consider/ clarify the following impact pathway:
- degradation of habitats as a result of changes in water quality/ hydrology during the operational (including maintenance) phase.
- 2.2.3 Potential for LSEs were ruled out (alone and in-combination) by the HRA Report [REP1-015] for this impact pathway. See table 2.2 of this RIES for further details.
- 2.2.4 The following potential impact pathways were scoped in for assessment by the applicant and are set out in section 4.7 of the updated HRA Report [REP1-015]:
- loss of FLL for qualifying bird species;
  - disturbance/ displacement of qualifying bird species using FLL during the construction phase;
  - disruption of flight paths of qualifying bird species as a result of glint and glare;
  - vibration/ noise disturbance of river lamprey;
  - disturbance of river lamprey as a result of EMF; and
  - habitat degradation as a result of changes in water quality/ hydrology during the construction/ decommissioning phase.
- 2.2.5 The HRA Report assessed the potential impacts during construction, operation (including maintenance) and decommissioning. Section 4.5 of the HRA Report states that for the purposes of the assessment, it has been assumed that decommissioning phase impacts would be similar to or less than those identified for the construction phase.

## 2.3 In-combination effects

- 2.3.1 Section 8 of the HRA Report [APP-145] detailed the applicant's approach to assessing in-combination effects. The projects included in the in-combination assessment were detailed in table 8-1, section 8.2 of the HRA Report [APP-145].
- 2.3.2 NE [REP2-154] noted in relation to in-combination impacts, that Carr Farm Solar Farm, which is located adjacent to mitigation area 11, has recently been consented and advised that further assessment should be provided in the in-combination assessment regarding the potential for this development to

impact on openness and sightlines for mitigation area 11. Additionally, NE advised that the in-combination assessment should consider recently submitted planning application 25/02275/STPLF, which is situated in close proximity to the site, and includes land within the red line boundary. Further detail regarding this matter has been recorded in table 3.1 of this RIES.

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

## 2.4 The applicant's assessment

- 2.4.1 The applicant's conclusions in respect of screening were clarified and updated in the updated HRA Report [REP1-015] and are summarised in table 4-19 of the updated HRA Report [REP1-015].

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

- 2.4.2 The applicant concluded 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 all qualifying features of the Greater Wash SPA.
- 2.4.3 NE confirmed it agreed with the applicant's conclusion of no LSEs in respect of the above European sites [REP1-093].

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

- 2.4.4 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:
- Hornsea Mere SPA;
  - Humber Estuary SPA;
  - Humber Estuary Ramsar site; and
  - Humber Estuary SAC.
- 2.4.5 The qualifying features and LSE pathways screened in by the applicant are identified in annex 1 table A1.1 of this RIES.
- 2.4.6 The applicant's decision to exclude certain LSE impact pathways 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 LSEs screened out or not considered by the applicant are summarised in table 2.2 below.

**Table 2.2: Issues raised in the examination to date by the ExA and IPs in relation to the applicant's screening of LSEs (alone and in-combination)**

ID	Potential impact pathway	Details of issue	ExA observation / question
<b>Greater Wash SPA / Hornsea Mere SPA / Humber Estuary SAC / Humber Estuary SPA / Humber Estuary Ramsar site</b>			
2.2.1	Degradation of habitats as a result of changes to water quality as a result of release of sediment from construction/ decommissioning activities (such as installation of culverts) and from spillage of chemicals or contaminants	<p>The ExA [PD-008] requested that NE confirm whether it was content for the applicant to scope out this impact pathway.</p> <p>NE [REP1-093] confirmed that it was content for this impact pathway to be scoped out. Its response highlighted outstanding comments [RR-012] regarding potential water quality impacts from the spillage of chemicals or contaminants, specifically the risk of bentonite breakout associated with HDD. These matters have been addressed in table 3.1 of this RIES.</p>	n/a – matter resolved
<b>Humber Estuary SAC / Humber Estuary Ramsar site</b>			

2.2.2	Degradation of habitats as a result of changes in water quality/ hydrology during operation (including maintenance)	<p>In its RR [RR-012], NE noted concern over water quality impacts during construction and operation and the HRA Report, specifically relating to the cleaning of solar PV modules and the fire suppression/ protocol during operation.</p> <p>The applicant updated the HRA Report [REP1-015] to consider/ clarify the following impact pathways and concluded that LSEs as a result of degradation of habitats due to changes in water quality/ hydrology during the operational phase of the proposed development could be ruled out (alone or in-combination) for the listed European sites.</p> <p>NE agreed with the conclusions of the updated HRA Report [REP2-154].</p>	n/a – matter resolved
<b>Humber Estuary SPA / Humber Estuary SAC / Humber Estuary Ramsar site</b>			
2.2.3	Potential abstraction impacts resulting from HDD during construction	<p>In its RR [RR-012], NE noted that the HRA Report [APP-145] acknowledged that water supply impacts could occur due to abstraction but did not provide details on the source of water required for the HDD. NE stated that if water was drawn from a local watercourse, an assessment of potential impacts on the Humber Estuary designated sites would need to be undertaken within the HRA. The applicant updated the HRA Report [REP1-015] to confirm that water for HDD would be brought to the site with no requirement for abstraction. HDD wastewater would be incarcerated within the launch pit and transported to a specialised local facility for disposal. The Outline Construction Environmental Management Plan (oCEMP) [REP1-050] was updated to include this commitment.</p>	n/a – matter resolved

		The applicant's conclusions of no LSE remained unaltered, and NE confirmed [REP2-154] that it considered this issue to be resolved.	
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### 3 ADVERSE EFFECTS ON INTEGRITY

#### 3.1 Conservation Objectives

- 3.1.1 The conservation objectives for all 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-145]. Following a request by the ExA in ExQ1 [PD-008], the HRA Report was updated [REP1-015] to include the conservation status of the identified European sites.

#### 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 adverse effects on integrity (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 7 of the HRA Report [APP-145].

##### **Mitigation measures**

- 3.2.2 The applicant's HRA Report was updated [REP3-014] to capture changes to the proposed mitigation and identified mitigation measures in section 7. These were taken into account in the applicant's assessment of effects on integrity.
- 3.2.3 Relevant mitigation measures are secured through the following documents, detailed versions of which would be secured under requirements of the draft DCO (dDCO) [APP-019]:
- oCEMP [APP-153], [REP1-050], [REP2-028], [REP2-138], [REP3-026] and [REP4-027];
  - Outline Operational Environmental Management (oOEMP) [APP-154] [REP1-052] and [REP3-030];
  - Outline Decommissioning Environmental Management Plan (oDEMP) [APP-155], [REP1-054], [REP2-030] and [REP3-028]; and
  - Outline Landscape and Ecological Management Plan (oLEMP) [APP-156], [PDA-018], [REP1-056], [REP2-032], [REP2-140], [REP3-032], [REP4-029] and [REP4-073].

##### **Sites for which the applicant concluded no AEol**

- 3.2.4 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.
- 3.2.5 The applicant's conclusions in respect of the Hornsea Mere SPA were not disputed by NE or IPs.
- 3.2.6 The applicant's conclusions and approach in respect of the following European sites were the subject of discussion and clarification during the course of the examination:

- Humber Estuary SAC;
- Humber Estuary SPA; and
- Humber Estuary Ramsar site.

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 AEol are summarised in table 3.1 below.

**Table 3.1: 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	Potential impact pathway	Details of issue	ExA observation / question
<b>Humber Estuary SPA and Humber Estuary Ramsar site</b>			
3.1.1	<p>Potential loss of FLL.</p> <p>Suitability of core mitigation areas - construction and operation</p>	<p>NE [RR-012] noted that the applicant's proposed mitigation areas for non-breeding birds associated with qualifying bird species of the Humber Estuary SPA/ Ramsar site may not be sufficient to adequately mitigate for impacts to qualifying bird species using FLL. NE advised that further assessment of the habitat suitability and the capacity of each parcel was required. NE also highlighted the applicant's position [APP-148] that a 150m buffer around core mitigation areas would not be workable. NE reiterated its advice that all core mitigation areas should be surrounded by a 150m buffer, and that where this buffer has not been included, further assessment of the suitability of areas closer to panels, and the amount of 'core habitat' available, was required.</p> <p>The applicant provided an updated oLEMP [REP1-056] which provided further assessment of the suitability of each proposed mitigation area. The applicant's response [REP3-039] provided an overview of the applicant's justification of the suitability of the mitigation and addressed other matters in NE's RR [RR-012] related to this point. A further update to the oLEMP [REP3-032] was provided by the applicant to include potential outline remedial measures for the proposed habitats within mitigation area 9, 11 and 13.</p> <p>NE [REP4-084] confirmed that it considered this point to now be resolved, based on the additional information provided.</p>	n/a – matter resolved.



3.1.2	<p>Potential loss of FLL.</p> <p>Impact of permissive footpaths on the functionality of the proposed mitigation areas – construction and operation</p>	<p>NE [RR-012] advised that the impacts of the proposed permissive walking routes around mitigation areas 9 and 11 on the functionality of the proposed mitigation areas should be assessed in the HRA. NE requested clarification on whether proposed footpaths would be separated from the mitigation areas by fencing, noting that if fencing is not proposed, the presence of dogs within mitigation areas could render the whole area unsuitable for relevant species. This matter was also raised by East Riding of Yorkshire Council (ERYC) [REP1-086].</p> <p>The ExA [PD-014] requested an update on this matter including a consideration of whether any potential disturbance could be overcome through the rerouting of areas, or the use of additional mitigation, for example.</p> <p>The Third Notification of Proposed Changes to the DCO Application [AS-017] detailed that the applicant was proposing amendments to the permissive path routes around mitigation areas 9 and 11 to address this matter.</p> <p>The subsequent formal change request (change request 3) [REP4-077] provided a summary of the changes which sought to address the concerns raised regarding the potential for disturbance to bird species caused by users of permissive paths within and adjacent to the ecological mitigation areas. These changes comprised:</p> <ul style="list-style-type: none"> <li>• change to permissive path route around field D18;</li> <li>• removal of permissive path loop around field E6 and extension of permissive paths around E7 and E8;</li> <li>• moving the permissive paths that run through the proposed biodiversity mitigation areas to the edge of field D16;</li> <li>• realignment of the permissive path in field B2 to run closer to the eastern edge of this field;</li> </ul>	<p><b>RIES Q1 to the applicant and NE:</b></p> <p><b>Can the applicant and NE provide an update of the discussions regarding the impact of permissive footpaths on the functionality of the proposed mitigation and provide an indication of whether they consider that this will be resolved during the course of examination.</b></p>
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		<ul style="list-style-type: none"> <li>• moving permissive path at the north of field B8 closer to the northern edge of the field, to the edge of the proposed biodiversity mitigation area in this field;</li> <li>• moving permissive paths throughout land area F closer to the edges of the fields; and</li> <li>• installation of post and wire fencing between permissive paths and ecological mitigation areas.</li> </ul> <p>Change request 3 was accepted into the examination by the ExA [PD-017], concluding that the proposals would not be considered a material change. The applicant provided an updated oLEMP [REP4-073] which incorporated the amendments relevant to change request 3.</p> <p>NE at D4 [REP4-042] showed this matter as unresolved and states that it is progressing discussions with the applicant regarding the design of permissive footpaths in proximity to the proposed mitigation areas. The draft SoCG [REP4-042] sets out that ERYC considers this point to now be resolved.</p>	
3.1.3	<p>Potential loss of FLL.</p> <p>Hydrological suitability of the proposed mitigation areas – construction and operation</p>	<p>NE [RR-012] in relation to the hydrology of the proposed mitigation areas advised that the existing drainage regime in the proposed mitigation areas should be considered to determine the ability of the fields to hold sufficient water. NE advised that in the absence hydrological studies or assessment prior to construction, a precautionary approach was needed. ERYC [REP1-086] also requested hydrological studies to confirm the suitability of land for the creation of wet grasslands and advised that it may be better to create permanent grassland instead, particularly in relation to proposed mitigation area 11.</p> <p>The applicant provided an updated oLEMP [REP1-056] which provided further information regarding the viability of the proposed</p>	n/a – matter resolved.

		<p>scrapes based on known information on the current hydrological statuses and permeability of soils in mitigation areas 9, 11 and 13. Further assessment was provided in the updated oLEMP [REP1-056] regarding the suitability and carrying capacity of each mitigation area to deliver mitigation for the intended species and it set out that pre-construction hydrological studies are proposed to determine the exact locations of the scrapes within the mitigation areas. In response to the comments from ERYC [REP1-086] the updated oLEMP [REP1-056] submitted at D1 replaced proposal for 'wet grassland with scrapes' with 'flower-rich neutral grassland with scrapes'.</p> <p>A further update to the oLEMP [REP3-032] secured that scrapes will be implemented, monitored and maintained to ensure suitable wetland habitat is in place for the duration of construction and operational phases of the proposed development. The HRA Report [REP3-014] was updated to provide relevant cross references to the updated information contained within the updated oLEMP [REP3-032].</p> <p>NE's submission at D4 [REP4-084] confirmed that it considered this point to now be resolved, based on the additional information provided by the applicant. The draft SoCG [REP3-043] sets out that ERYC considers this point to now be resolved.</p>	
3.1.4	<p>Potential loss of FLL.</p> <p>Management of the proposed mitigation areas – construction and operation</p>	<p>NE [RR-012] item NE1d, advised that sufficient detail of the proposed management and monitoring approach was required in the oLEMP [APP-156] at this stage to ensure the HRA conclusions regarding mitigation measures are robust and deliverable.</p> <p>NE advised that the oLEMP [APP-156] should include:</p> <ul style="list-style-type: none"> <li>• clear objectives;</li> <li>• targets for each objective, including SPA bird use targets and habitat targets;</li> </ul>	n/a – matter resolved

		<ul style="list-style-type: none"> <li>• details of required management and monitoring (including who is responsible and when it will take place);</li> <li>• details of limits of acceptable change; and</li> <li>• details of remedial actions, where appropriate.</li> </ul> <p>NE made recommendations relating to sward management, scrape management and requested that the oLEMP [REP1-056] appropriately secured that the creation of wintering bird habitat within mitigation areas is completed in advance of infrastructure work to ensure appropriate habitat is available prior to the beginning of the construction phase as described within the HRA Report [APP-145].</p> <p>The applicant provided an updated oLEMP [REP1-056] which included indicative management and monitoring procedures. The applicant stated in its draft SoCG with NE [REP1-078] that the monitoring strategy took on points raised by NE, and that the final management and monitoring protocol in the LEMP will be agreed in consultation with NE at the detailed design stage.</p> <p>NE [REP2-153] welcomed the updates and noted the following outstanding concerns/ requests:</p> <ul style="list-style-type: none"> <li>• maximum sward height should be 10cm during winter;</li> <li>• clarification on how national trends would be considered in assessment of bird numbers and 'success' of the mitigation areas;</li> <li>• potential need to increase the frequency of bird monitoring for years 3-10; and</li> <li>• clarification on 'the right habitat conditions' and specific remedial action in relation to the following text in the oLEMP: "If the number of birds fall below the baseline conditions when taking into consideration national trends, the applicant should</li> </ul>	
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		<p>ensure habitat management is providing the right habitat and conditions as outlined in the LEMP”.</p> <p>Further to this NE also advised that a monitoring report should be produced following each of the completed surveys and that these reports should be submitted to the local planning authority (LPA) for review, with NE consulted if the site is failing to meet its targets.</p> <p>The applicant’s oLEMP [REP3-032] was updated to address each of these points.</p> <p>NE’s D4 submission [REP4-084] confirmed that it considered this point to now be resolved based on the additional information provided. NE recommended that the remedial measures in table 15-3 and table 16-3 of the oLEMP [REP3-039] should be revised to incorporate ‘appropriate measures to increase invertebrate numbers’. NE stated that this requested clarification is unlikely to make a material difference to their advice or the outcome of the decision-making process.</p>	
3.1.5	<p>Potential loss of FLL.</p> <p>Passage/ wintering bird surveys of the grid connection cable route – construction and operation</p>	<p>NE [REP2-154] on review of the Grid Connection Bird Survey Report [REP1-072] and the inclusion of the new data in the HRA Report [REP1-015] advised that further assessment should be provided to determine whether the proposed measures are sufficient in the context of the updated bird survey results, particularly regarding potential impacts to pink-footed geese. NE noted that noise and visual disturbance impacts resulting from temporary loss of and disturbance to FLL will need to be considered.</p> <p>The applicant updated the HRA Report [REP3-014] to provide further consideration in relation to pink-footed geese recorded within the grid connection cable route. The applicant stated in its draft SoCG with NE [REP3-047] that during the 2024/25 bird surveys, pink-footed geese were seen flying over on four occasions and were only recorded twice</p>	n/a – matter resolved

		<p>within the order limits. The applicant further stated that although the numbers recorded within the order limits were more than 1% of the SPA population, the grid connection cable route is not considered to constitute FLL for pink-footed geese.</p> <p>NE's D4 submission [REP4-084] agreed that pink-footed geese would not be significantly affected by disturbance/ displacement from FLL within the grid connection corridor during construction due to short-term nature of construction works and the mobile nature of pink-footed geese and noted that the agreed non-breeding bird mitigation areas would also provide additional feeding areas for this species during this period.</p> <p>NE stated that it did not agree with the applicant's conclusion of the grid connection cable route not being considered to constitute FLL for pink-footed geese but advised that significant effects on this species can be ruled out based on the factors outlined above.</p>	
3.1.6	<p>Potential loss of FLL.</p> <p>Bird days calculation methodology – construction and operation</p>	<p>NE in its RR [RR-012] highlighted that as previously requested, lapwing and golden plover 'bird days' requirements were now considered separately to ensure that mitigation is sufficient to deliver for the combined number of both species recorded.</p> <p>The 'bird days' calculations within appendix E of the updated oLEMP [REP1-056] that was submitted at D1 were updated to consider lapwing and golden plover separately and to take account of the data in the Grid Connection Cable Route Bird Survey Report [REP1-072], which was also submitted at D1.</p> <p>NE [REP2-154] confirmed that this matter is now considered to be resolved.</p>	n/a – matter resolved
3.1.7	Potential noise and visual disturbance	NE [RR-012] advised that the HRA should set sensitive receptors in the context of the existing noise environment and recommended further assessment regarding the predicted location of 'noisy' works in	n/a – matter resolved

	impacts to FLL - construction	<p>the context of the bird survey results, to identify whether disturbing noise levels from the development will reach land utilised by birds in significant numbers. NE advised that when interpreting noise assessment results, it does not propose specific thresholds for determining when an impact will occur and described the relevant factors which should be considered together. NE recommended that suitable mitigation should be explored for predicted noise levels above 50dB.</p> <p>NE made recommendations on potential mitigation measures and advised that an assessment should be provided of the predicted reduction in noise levels that will occur as a result of the proposed mitigation measures, to assess their effectiveness.</p> <p>The applicant [REP-071] detailed that it would avoid completing the activities most likely to disturb birds during winter (October to March) and only activities less likely to disturb birds would take place in fields adjacent to the Humber Estuary designated sites. If this is not possible, acoustic fencing would be installed for the construction period. The HRA Report [REP1-015] and oCEMP [REP1-050] were updated to secure these commitments. The oCEMP was also updated to include a commitment relating to no night-time working (unless agreed with the LPA) and keeping any artificial light to a minimum.</p> <p>EYRC [REP1-086] advised that with regard to noise disturbance the HRA Report makes an assessment on guidance that NE does not support and that construction impacts such as noise and visual disturbance should be considered up to 300m from source and assessed in consideration of baseline scenarios.</p> <p>The ExA [PD-014] requested that the applicant confirm whether the assessment is based on guidance supported by NE. The applicant [REP3-040] acknowledged that consultation with NE indicates concern regarding the use of the Waterbird Disturbance and Mitigation</p>	
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		<p>Toolkit but stated that the assessment has not relied on information provided in this guidance and the applicant's response sets out how a precautionary approach has been undertaken regarding noise and disturbance.</p> <p>NE [REP2-154] stated that consideration of noise and visual disturbance to the mitigation areas is now resolved but reiterated the remaining outstanding matters recorded above.</p> <p>The applicant [REP3-039] provided further context on the bird survey results and the pattern of bird activity within and adjacent to the order limits, including the grid connection cable route. The HRA Report [REP3-014] was amended to clarify that the measures included in the oCEMP [REP3-026] would be implemented to mitigate the effect of disturbance/ displacement of relevant bird features of the Humber Estuary SPA and Humber Estuary Ramsar site within and adjacent to the order limits, including the grid connection cable route, as well as the mitigation areas. The applicant stated that it does not consider a requirement to undertake additional noise monitoring in relation to wintering birds is necessary given that no hotspots for birds were identified and considering the proposed mitigation measures.</p> <p>NE's D4 submission [REP4-084] confirmed that it considered all of the above matters to now be resolved based on the additional information provided. The draft SoCG [REP3-043] sets out that ERYC considers this point to now be resolved.</p>	
3.1.8	Potential noise and visual disturbance impacts to FLL from overhead powerlines –	<p>NE [RR-012] queried whether the powerlines and pylons displayed in Figure 3.5 Indicative Construction Layout Plan [APP-059] were new or existing and requested that if above ground power lines/ pylons are required, SPA bird flightlines should be considered in the HRA, including assessment of collision risk.</p>	n/a – matter resolved



	construction and operation	<p>The applicant's response to RRs [REP1-071] confirmed that no new overhead power lines would be constructed as part of the proposed development. The overhead power lines depicted on ES Volume 3 Figure 3.5 Indicative Construction Layout Plan [APP-059] are existing and therefore no assessments require updating.</p> <p>NE [REP2-154] confirmed that it considered this issue to be resolved.</p>	
3.1.9	Potential loss of FLL for the relevant qualifying bird features from in-combination impacts – construction and operation	<p>NE [REP2-154] noted in relation to in-combination effects, that Carr Farm Solar Farm, which is located adjacent to mitigation area 11, has recently been consented and advised that further assessment should be provided in the in-combination assessment regarding the potential for this development to impact on openness and sightlines for mitigation area 11. Additionally, NE advised that the in-combination assessment should consider recently submitted planning application 25/02275/STPLF, which is situated in close proximity to the site, and includes land within the red line boundary.</p> <p>The applicant [REP3-039] provided a rationale as to why the consented Carr Farm Solar Farm would not affect the functionality of mitigation area 11 and stated that the proposed mitigation areas for Carr Farm Solar Farm are directly adjacent to mitigation area 13 and therefore compliment the proposed development's proposed mitigation. The HRA Report [REP3-014] was updated to include this information and to include planning application 25/02275/STPLF in the in-combination assessment. The applicant noted [REP3-039] that planning application 25/02275/STPLF has not yet provided sufficient information to identify potential impacts to European designated sites.</p> <p>NE [REP4-084] considered this matter to be resolved.</p>	n/a - matter resolved
<b>Humber Estuary SPA</b>			
3.1.10	Marsh harrier	<p>Yorkshire Wildlife Trust (YWT) [RR-017] disputed the HRA Report's [APP-145] conclusions of land within and adjacent to land areas B to</p>	<b>RIES Q2 to the applicant, YWT and NE:</b>

		<p>F of the proposed development not constituting FLL for marsh harrier, a qualifying species for the Humber Estuary SPA. YWT stated that given two breeding pairs are known to be located in the nearby Tophill Low Special Site of Scientific Interest (SSSI), the order limits of the site and adjacent area should be considered as FLL for this protected species.</p> <p>The ExA [PD-008] requested that the applicant responded in detail to the HRA matters raised by YWT in its RR [RR-017].</p> <p>The applicant [REP1-071] in response stated that Tophill Low SSSI is located over 2km from the order limits and the breeding habitat associated with this designated site will not be affected by the proposed development. The applicant further stated that as detailed within ES Volume 4, appendix 7.3: Breeding Bird Survey Report [APP-107] no breeding marsh harriers have been recorded within or adjacent to the proposed development.</p> <p>The draft SoCG with YWT [REP4-050] shows this matter as under discussion.</p>	<p><b>Can the applicant and YWT provide an update on the status of these discussions.</b></p> <p><b>Can NE advise whether it considers land within and adjacent to land areas B to F of the proposed development to constitute FLL for marsh harrier.</b></p>
<b>Humber Estuary SAC and Humber Estuary Ramsar Site</b>			
3.1.11	Potential disturbance impacts to lamprey from HDD (vibration/ noise) and EMF – construction and operation	<p>NE [RR-012], the Environment Agency (EA) [RR-005] and ERYC [REP1-086] requested that the preferred timings to undertake HDD (spring/ summer to avoid the peak lamprey migration period) referred to within the HRA Report [APP-145] should be appropriately secured within the oCEMP. The ExA [PD-014] requested an update on this matter.</p> <p>NE [RR-012] and ERYC [REP1-086] advised that a minimal cable burial depth of 7m below the riverbed should be appropriately secured in the CEMP, alongside the use of an ‘insulating layer (made of XLPE, also known as cross-linked polyethylene, or similar), which would eliminate the electric field’.</p>	n/a – matter resolved

		<p>The EA [RR-005] noted that insufficient evidence or detail had been provided to support the assumption that EMF from cables buried at 7m depth under the River Hull would not impact fish requested details of the magnetic field strength and how it compared to natural background levels at the riverbed where the cables were buried.</p> <p>NE recommended that post-consent monitoring of EMF could be undertaken to help inform future assessments.</p> <p>The applicant [REP3-039] stated that it could not commit to the preferred timings to undertake HDD at this stage but would adhere to these timings where possible. The updated HRA Report [REP1-015] provided further rationale as to why AEol are not considered likely in the event that it is not possible to avoid the river lamprey migration period.</p> <p>The oCEMP [REP3-026] was updated to secure commitments relating to distance of HDD pits from Main Rivers, undertaking HDD at a minimum depth of 7m below the riverbed and the insulation of cabling under the River Hull.</p> <p>Submissions from NE [REP2-154], the EA [REP2-153] and ERYC [REP3-043] show all of the above matters to now be resolved.</p>	
3.1.12	Potential water quality impacts from bentonite breakout associated with HDD - construction	<p>NE [RR-012] advised that the oCEMP [APP-153] should provide sufficient site-specific detail on the required mitigation measures for bentonite breakout to inform conclusions in the HRA.</p> <p>The applicant [REP1-071] responded stating that as described within the oCEMP, the CEMP would include details regarding HDD breakout, including site-specific methodologies, where necessary. The response stated that details of these activities cannot be finalised until a principal contractor is appointed and specific methodologies are agreed upon. The HRA Report [REP1-015] was updated to refer to</p>	n/a – matter resolved

		<p>the need to include site-specific methodology in the CEMP, once the principal contractor has been appointed.</p> <p>NE [REP2-154] noted the applicant's position that final details of the bentonite breakout management activities cannot be provided at this stage but advised the applicant provides the following details to inform the HRA:</p> <ul style="list-style-type: none"> <li>• providing the options of what the procedures could be (for example, the Rochdale envelope type approach);</li> <li>• assessing the worst-case scenario to show whether AEol can be ruled out;</li> <li>• confirming that the general HDD practices included in the oCEMP would be secure; and</li> <li>• clarifying how the approach would be decided post-consent.</li> </ul> <p>The applicant's response [REP3-039] stated that the procedures prescribed in the CEMP would be in line with the principal contractor's method statements and that NE would be consulted on bentonite breakout procedures included in the CEMP prior to construction commencing.</p> <p>The applicant detailed that measures included in the oCEMP [APP-153] would be secured by requirement 4 of the dDCO [APP-019] relating to a detailed CEMP. The applicant further detailed that NE has been added as a statutory consultee on the CEMP under requirement 4 of the dDCO [REP3-005] in relation to measures relating to bentonite breakout.</p> <p>NE's D4 submission [REP4-084] shows this matter as resolved based on the additional information provided.</p>	
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### 3.4 Summary of examination outcomes in relation to adverse effects on integrity

- 3.4.1 Of the remaining outstanding matters detailed in table 3.1, the ExA seeks responses from the applicant and the ANCB, where indicated.
- 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 table A1.1 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 D4 (31 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 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 table 3.1 of this RIES; and
  - confirmation whether the ExA's understanding of screening and adverse effects conclusions at point of RIES publication (table (A1.1) in annex 1) is correct.
- 4.0.3 Comments on the RIES must be submitted for D5 (28 November 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 relevant ANCB/ IPs at time of publication of this RIES.

**Key to tables:**

C = Construction

O = Operation

D = Decommissioning

✓ = LSE or AEoI cannot be excluded

X = LSE or AEoI can be excluded

Y = Yes

N = No

? = Unclear

n/a = not applicable

**Table A1.1: Applicant's conclusions of LSE and AEol**

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, O and D unless otherwise stated)	LSE?		AEoI?	
		Applicant’s conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant’s conclusion (alone or in combination)	Agreement with ANCB/ IPs?
Hornsea Mere SPA					
Gadwall Goldeneye Pochard Shoveler Tufted duck Mute Swan	Loss of FLL for qualifying bird species (C)	✓	Y [REP1-093]	X	Y [REP1-093]
	Disturbance/ displacement of qualifying bird species using FLL (C and D)	✓	Y [REP1-093]	X	Y [REP1-093]
	Disturbance/ displacement of qualifying bird species using FLL (O)	X	Y [REP1-093]	n/a	n/a
	Degradation of habitats as a result of changes in water	✓	Y [REP1-093]	X	Y [REP1-093]



Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
	quality/ hydrology (C and D)				
	Degradation of habitats as a result of changes in water quality/ hydrology (O)	X	Y [REP1-093]	n/a	n/a
	Degradation of habitats as a result of changes in air quality (C and D)	X	Y [REP1-093]	n/a	n/a
	Disruption of flight paths of qualifying bird species as a result of glint and glare (O)	✓	Y [REP1-093]	X	Y [REP1-093]
<b>Humber Estuary SPA</b>					
Avocet (wintering non-breeding)	Loss of FLL for qualifying bird species (C and O)	✓	Y [REP1-093]	X	<b>N [REP4-084]</b>

Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
Bar-tailed godwit (wintering) Bittern (wintering and breeding)	Disturbance/ displacement of qualifying bird species using FLL (C and D)	✓	Y [REP1-093]	X	Y [REP4-084]
Black-headed gull Black-tailed godwit (wintering and passage)	Disturbance/ displacement of qualifying bird species using FLL (O)	X	Y [REP2-154]	n/a	n/a
Brent goose (non-breeding) Crane (non-breeding)	Degradation of habitats as a result of changes in water quality/ hydrology (C and D)	✓	Y [REP2-154]	X	Y [REP2-154]
Curlew (non-breeding) Dunlin (wintering and passage)	Degradation of habitats as a result of changes in water quality/ hydrology (O)	X	Y [REP1-093]	n/a	n/a
	Degradation of habitats as a result of	X	Y [REP1-093]	n/a	n/a

Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
Golden plover (wintering, non-breeding)	changes in air quality (C and D)				
Goldeneye (non-breeding)	Disruption of flight paths of qualifying bird species as a result of glint and glare (O)	✓	Y [REP1-093]	X	Y [REP1-093]
Green sandpiper (non-breeding)					
Greenshank (non-breeding)					
Grey plover (non-breeding)					
Greylag goose (non-breeding)					
Hen harrier (wintering)					
Knot (wintering and passage, non-breeding)					
Lapwing (non-breeding)					

Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
Little egret (non-breeding) Little tern (breeding) Mallard (non-breeding) Marsh harrier (breeding) Oystercatcher (non-breeding) Pink-footed goose (non-breeding) Pochard (non-breeding) Redshank (wintering and passage, non-breeding)					

Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
Ringed plover (non-breeding) Ruff (non-breeding) Sanderling (non-breeding) Scaup (non-breeding) Shelduck (wintering and non-breeding) Shoveler (non-breeding) Teal (non-breeding) Turnstone (non-breeding) Whimbrel (non-breeding)					

Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
Wigeon (non-breeding) Wintering bird assemblage					
<b>Humber Estuary Ramsar site</b>					
Near-natural estuary with the following component habitats: Dune systems and humid dune slacks Estuarine waters Intertidal mud and sand flats Salt-marshes Coastal brackish/saline lagoons	Degradation of habitats as a result of changes in water quality/ hydrology	X	Y [REP1-093]	n/a	n/a
	Degradation of habitats as a result of changes in air quality (C and D)	X	Y [REP1-093]	n/a	n/a

Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
Natterjack Toad					
Grey seal	Degradation of habitats as a result of changes in water quality/ hydrology	X	Y [REP1-093]	n/a	n/a
Non-breeding waterbird assemblage	Loss of FLL for qualifying bird species (C and O)	✓	Y	X	<b>N [REP4-084]</b>
Golden plover (passage and wintering)	Disturbance/ displacement of qualifying bird species using FLL (C and D)	✓	Y	X	Y [REP4-084] and [REP3-043]
Knot (passage and wintering)	Disturbance/ displacement of qualifying bird species using FLL (O)	X	Y [REP2-154]	n/a	n/a
Dunlin (passage and wintering)					
Black-tailed godwit (passage and wintering)	Degradation of habitats as a result of changes in water	✓	Y [REP2-154]	X	Y [REP2-154]

Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
Redshank (passage and wintering) Shelduck (wintering) Bar-tailed godwit (wintering)	quality/ hydrology (C and D)				
	Degradation of habitats as a result of changes in water quality/ hydrology (O)	X	Y [REP2-154]	n/a	n/a
	Degradation of habitats as a result of changes in air quality (C and D)	X	Y [REP1-093]	n/a	n/a
	Disruption of flight paths of qualifying bird species as a result of glint and glare (O)	✓	Y [REP1-093]	X	Y [REP1-093]
River lamprey	Degradation of habitats as a result of changes in water quality/ hydrology (C and D)	✓	Y [REP2-154]	X	Y [REP4-084]



Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
	Degradation of habitats as a result of changes in water quality/ hydrology (O)	X	Y [REP2-154]	n/a	n/a
	Vibration/ noise disturbance of river lamprey (C)	✓	Y [REP1-093]	X	Y [REP2-154], [REP2-153] and [REP3-043]
	Disturbance of river lamprey as a result of EMF (O)	✓	Y [REP1-093]	X	Y [REP2-154], [REP2-153] and [REP3-043]
Sea lamprey	Degradation of habitats as a result of changes in water quality/ hydrology	X	Y [REP1-093]	n/a	n/a
	Vibration/ noise disturbance of lamprey (C)	X	Y [REP1-093]	n/a	n/a
	Disturbance of lamprey as a result of EMF (O)	X	Y [REP1-093]	n/a	n/a

Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant’s conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant’s conclusion (alone or in combination)	Agreement with ANCB/ IPs?
Humber Estuary SAC					
Estuary Mud and sand flats Saline lagoons	Degradation of habitats as a result of changes in water quality/ hydrology	X	Y [REP1-093]	n/a	n/a
	Saltmarsh – Atlantic salt meadow and pioneer saltmarsh Sub-tidal sandbanks	Degradation of habitats as a result of changes in air quality (C and D)	X	Y [REP1-093]	n/a
Grey seal	Degradation of habitats as a result of changes in water quality/ hydrology	X	Y [REP1-093]	n/a	n/a
River lamprey	Degradation of habitats as a result of changes in water	✓	Y [REP1-093]	X	Y [REP4-084]

Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
	quality/ hydrology (C and D)				
	Degradation of habitats as a result of changes in water quality/ hydrology (O)	X	Y [REP1-093]	n/a	n/a
	Vibration/ noise disturbance of river lamprey (C)	✓	Y [REP1-093]	X	Y [REP2-154], [REP2-153] and [REP3-043]
	Disturbance of river lamprey as a result of EMF (O)	✓	Y [REP1-093]	X	Y [REP2-154], [REP2-153] and [REP3-043]
Sea lamprey	Degradation of habitats as a result of changes in water quality/ hydrology	X	Y [REP1-093]	n/a	n/a
	Vibration/ noise disturbance of lamprey (C)	X	Y [REP1-093]	n/a	n/a

Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
	Disturbance of lamprey as a result of EMF (O)	X	Y [REP1-093]	n/a	n/a
<b>Greater Wash SPA</b>					
Red-throated diver (non-breeding)	Loss of FLL for qualifying bird species (C)	X	Y [REP1-093]	n/a	n/a
Little gull (non-breeding)	Disturbance/ displacement of qualifying bird species using FLL (C)	X	Y [REP1-093]	n/a	n/a
Sandwich tern (breeding)					
Common tern (breeding)	Degradation of habitats as a result of changes in water quality/ hydrology	X	Y [REP1-093]	n/a	n/a
Little tern (breeding)					
Common Scoter (passage)	Degradation of habitats as a result of changes in air quality (C and D)	X	Y [REP1-093]	n/a	n/a

Feature	Potential impact (C, O and D unless otherwise stated)	LSE?		AEol?	
		Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?	Applicant's conclusion (alone or in combination)	Agreement with ANCB/ IPs?
	Disruption of flight paths of qualifying bird species as a result of glint and glare (O)	X	Y [REP1-093]	n/a	n/a