



Planning
Inspectorate

REPORT on the IMPLICATIONS for EUROPEAN SITES

Proposed One Earth Solar Farm

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

Planning Inspectorate Reference: EN010159

30 September 2025

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1 INTRODUCTION

1.1 Background

- 1.1.1 One Earth Solar Farm ('the applicant') has applied for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA2008) for the proposed One Earth 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 3 (DL3) of the examination (16 September 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:
- [One Earth Solar Farm - Project information](#)
- 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) - 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.
- 1.1.8 Comments on the RIES are timetabled for DL4 (14 October 2025).

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):
 - Shadow Habitat Regulations Assessment [APP-165], updated at DL1 [REP1-019]
- 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 HRA Matters Considered During the Examination

- 1.3.1 The examination to date has focussed on the following matters:
 - impacts to sea lamprey and river lamprey qualifying features of the Humber Estuary SAC and Humber Estuary Ramsar Site from construction pollutants
 - impacts to sea lamprey and river lamprey qualifying features of the Humber Estuary SAC and Humber Estuary Ramsar Site from electro-magnetic fields (EMF)

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 paragraph 2.1.9 of the shadow HRA (sHRA) report [APP-165]. The following Zones of Influence were used for the screening assessment:
- 30 km for non-breeding birds
 - 12km for bats
 - European sites connected to the River Trent (upstream or downstream directly or via tributaries)

Sites within the UK National Site Network (NSN)

- 2.1.3 The applicant's sHRA Report [APP-165] identified two European sites within the UK National Site Network for inclusion within the assessment. These are the Humber Estuary SAC and the Humber Estuary Ramsar site.
- 2.1.4 The applicant's submitted sHRA report [APP-165] did not contain a figure to identify the European sites considered in the assessment. At ExQ1, the ExA requested information to show the proposed development in relation to European sites [PD-010, Q8.0.1]. The locations of these sites relative to the proposed development were subsequently provided by the applicant as appendix A.1 of the sHRA Report [REP1-019].
- 2.1.5 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 sHRA Report detailed the potential impacts from the proposed development, along with the potential geographical extent of effects. Appendix A.2 of the sHRA Report [REP1-019] listed the sites and qualifying features and the impact pathways which could affect them.

Table 2.1 Pathways for LSE assessed by the applicant

European site / qualifying feature	LSE pathway
Humber Estuary SAC	
River lamprey <i>Lampetra fluvialis</i> and	<ul style="list-style-type: none">• Noise and vibration (construction)

European site / qualifying feature	LSE pathway
sea lamprey <i>Petromyzon marinus</i>	<ul style="list-style-type: none"> • Pollutant loss from dust, run-off and hydrocarbons (construction) • Barrier impacts from EMF (operation)
Humber Estuary Ramsar Site	
River lamprey and sea lamprey (Ramsar Criterion 8)	<ul style="list-style-type: none"> • Noise and vibration (construction) • Pollutant loss from dust, run-off and hydrocarbons (construction) • Barrier impacts from EMF (operation)

2.2.2 The sHRA Report assessed potential impacts during the construction and operation and maintenance phases. Impacts during the decommissioning phase were not assessed, as all underground cables located deeper than 0.9 metres will remain in place unless future guidance at the time of decommissioning recommends their removal. Additionally, any other infrastructure installations are located away from freshwater habitats and are therefore not expected to cause increased disturbance to lamprey.

2.2.3 No additional impact pathways have been identified by IPs for inclusion within the assessment in the examination to date (up to DL3).

2.3 In-combination effects

2.3.1 Section 4 of the sHRA Report [APP-165] detailed the applicant's approach to assessing in-combination effects.

2.3.2 The applicant's sHRA report [APP-165] did not include a list of other projects or plans considered in the sHRA assessment of in-combination effects. At ExQ1 [PD-010, Q8.0.4], the ExA requested clarification on which projects or plans were assessed. These were subsequently detailed in section 4.1.11 of the updated sHRA Report [REP1-019], with their locations illustrated in ES Figure 18.9 [APP-079].

2.3.3 No further matters have been raised in relation to the applicant's in-combination assessment of LSE in the course of the examination.

2.4 The applicant's assessment

2.4.1 The applicant's conclusions in respect of screening are presented in section 4 of the sHRA Report [APP-165].

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

2.4.2 The applicant concluded [APP-165] 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 the following European site(s):

- Humber Estuary SAC
- Humber Estuary Ramsar Site

2.4.3 The qualifying features and LSE pathways screened in by the applicant are detailed in section 4 and appendix A.2 of the sHRA Report [REP1-019]. All European sites / qualifying features and LSE pathways set out in table 2.1 were included in the applicant's assessment.

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 and/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
Humber Estuary SAC and Humber Estuary Ramsar Site			
2.1	Water quality impacts from construction pollutants on migratory river and sea lamprey – construction	<p>Nottinghamshire County Council (NCC) [RR-154] raised concerns that a 16m buffer from the River Trent may be insufficient to prevent impacts on species supported by the river.</p> <p>At ExQ1 [PD-010, Q8.0.7] the ExA asked the applicant and NE to respond to NCC's concerns and justify why a 16m buffer from the River Trent is considered sufficient to prevent impacts on migratory lamprey from construction runoff and drilling breakout fluid.</p> <p>The applicant [REP2-084] responded that construction activities near the River Trent will involve a trenchless crossing, with most work focused on compound mobilisation and demobilisation. These surface works are situated at a sufficient distance from the river to enable effective control of construction runoff. The 16m stand-off to the River Trent is secured through Requirement 13 of the draft DCO [REP1-007] and the Outline CEMP [REP1-047].</p> <p>The applicant further stated that while drilling fluid breakout is a known risk associated with horizontal directional drilling the risk is mitigated through several measures. These include ensuring that the drill bed passes at least 5 metres below the riverbed and implementing management and monitoring protocols as outlined in</p>	N/A – matter resolved

		<p>the Outline Construction Environmental Management Plan [REP1-047].</p> <p>NE [REP2-099] confirmed they are satisfied that the set off distance of 16m combined with measures outlined in the Construction Environment Management Plan are precautionary enough to avoid impacts from construction to functionally linked habitat of migratory lamprey species using the River Trent.</p>	
2.2	EMF barrier impacts to migratory fish – depth of cables - operation	<p>At ExQ1 [PD-010, Q8.0.3], the ExA requested that the applicant provide evidence demonstrating that a 5-metre burial depth for transmission cables would effectively prevent electromagnetic fields (EMF) and heat from altering the behaviour of adult or juvenile lamprey.</p> <p>In response [REP2-084], the applicant referenced findings from the <i>Risk Assessment of EMF Impacts on Fish</i>, submitted during the examination of the West Burton Solar Project. The assessment concluded that electric fields generated by the proposed cable are unlikely to be perceived beyond the cable's armouring, and certainly not beyond the 5-metre burial depth beneath the riverbed. Therefore, potential effects of electric fields on fish are considered unlikely. This conclusion was discussed and deemed appropriate by the SoS in their decision letter.</p>	N/A – matter resolved
2.3	EMF impacts to sea lamprey and river lamprey – operation and monitoring	<p>Nottinghamshire County Council (NCC) [RR-154] raised concerns that monitoring lamprey populations for no more than five years may be insufficient, given the species' life cycle.</p> <p>At ExQ1 [PD-010, Q8.0.8], the ExA asked the applicant and NE to address NCC's concerns and clarify the rationale behind the proposed five-year monitoring period for assessing potential barrier impacts from EMF on lamprey populations in the River Trent.</p>	N/A – matter resolved

		<p>The applicant [REP2-084] responded that the five-year monitoring period was established based on agreements reached with NE, the Environment Agency, and other Nationally Significant Infrastructure Projects involving transmission cables beneath the River Trent. This approach mirrors that taken for projects such as the West Burton Solar Project, where similar conclusions were accepted.</p> <p>NE [REP2-099] confirmed that the five-year timeframe for monitoring is consistent with the approach taken by other projects involving trenchless cable crossings under the River Trent and they are satisfied with the monitoring duration proposed for the project.</p>	
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3 CONCLUDING REMARKS

- 3.0.1 This RIES is based on information submitted throughout the examination by the applicants and IPs, up to DL3 (16 September 2025), in relation to potential effects on European sites. It should be read in conjunction with the examination documents referred to throughout.
- 3.0.2 The applicant concludes that LSE can be excluded to the Humber Estuary SAC and Humber Estuary Ramsar Site. The ExA's understanding of the applicant's and NE's positions in relation to LSE matters is set out above.
- 3.0.3 Comments on the RIES must be submitted for DL4 (14 October 2025).