

Date: 01 May 2026
Your ref: EN010168 – Deadline 1



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BY EMAIL ONLY

Dear Sir/Madam

NSIP Reference Name / Code: Lime Down Solar Park / EN010168

User Code: [REDACTED]

Deadline 1 – Natural England’s Written Representations

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

1. Purpose and structure of these representations

- 1.1. These Written Representations are submitted in pursuance of rule 10(1) of the Infrastructure Planning (Examination Procedure) Rules 2010 ('ExPR') in relation to an application under the Planning Act 2008 for a Development Consent Order ('DCO') for Lime Down Solar Project ('the Project') submitted by Lime Down Solar Park Limited ('the Applicant') to the Secretary of State.
- 1.2. Natural England has already provided a detailed description of its principal concerns in its Relevant Representations, submitted to the Planning Inspectorate on 12 January 2026. This document comprises an updated summary of Natural England’s views, as they have developed in view of the common ground discussions that have taken place with the Applicant to date.
- 1.3. Natural England is continuing in discussion with the applicant to resolve remaining issues and is in the process of preparing a Statement of Common Ground with the applicant.

2. Natural England's concerns and advice

2.1. The principal issues

- 2.1.1. Natural England identified the following main issues in its Relevant Representations:
 - a. Impacts to internationally designated sites
 - b. Impacts to nationally designated sites
 - c. Impacts to protected species
 - d. Impacts to nationally designated landscapes
 - e. Impacts to soils and best and most versatile agricultural land

These issues will be discussed in corresponding sections below along with any updates on the progress or resolution of issues.

2.2. Impacts on internationally designated sites

2.2.1. Following Natural England's Relevant Representations, Natural England and the applicants ecological consultant's have engaged in further discussions regarding the potential for Lime Down C to provide functionally linked land for lesser horseshoe bats associated with the Bath and Bradford on Avon Bats SAC and proposed mitigation measures. Natural England and the applicant have not yet been able to reach agreement on whether this area should be classified as functionally linked. As set out in Natural England's Relevant Representations, we maintain that the area should be classified as functionally linked land due to the reasons highlighted in our Relevant Representations.

2.2.2. Despite not reaching agreement on the above point, Natural England and the applicant have reached agreement on the mitigation measures which would need to be included within Lime Down C to ensure that significant impacts to SAC lesser horseshoe bats resulting from fragmentation could be avoided. These measures comprise:

- a. Retention of hedgerows across Lime Down C with any required new gaps in hedgerows to be limited to a maximum of 10m (it is understood that a majority will be limited to 3.5 – 6m) with the exception of one larger gap of 12 – 14m for the proposed access off the Fosse Way
- b. Construction Lighting will be controlled to prevent light spill onto suitable commuting habitats

2.2.3. Provided the above measures are secured through the DCO and reflected in necessary documentation, Natural England consider that significant fragmentation impacts to lesser horseshoe bats could be avoided.

2.2.4. There are no further changes to Natural England's advice provided on internationally designated sites in our Relevant Representations.

2.3. Impacts to nationally designated sites

2.3.1. There is no change to Natural England's advice provided on nationally designated sites in our Relevant Representations

2.4. Impacts to protected species

2.4.1. Following Natural England's Relevant Representations, the applicant's ecological consultants have provided further information and explanation relating to potential impacts arising to protected species as a result of the scheme. Discussions are ongoing between the applicant and Natural England on this matter.

2.5. Impacts to nationally designated landscapes

2.5.1. Following Natural England's Relevant Representations, Natural England and the applicants landscape consultants have met to discuss Natural England's comments provided regarding

nationally designated landscapes, specifically in relation to Natural England's request for an assessment of inter project cumulative effects on the National Landscape.

- 2.5.2. Following the further information provided in *The Applicant's Response to Relevant Representations (Part 1)* (Document Ref EXAM/9.1), providing that there are no proposed developments within the area of the setting of the Cotswolds National Landscape within the 10km Cumulative Study Area, Natural England have no further comments to make on this point.
- 2.6. **Impacts to soils and best and most versatile agricultural land**
- 2.6.1. Following Natural England's Relevant Representations, Natural England and the applicants landscape consultants have met to discuss Natural England's comments provided regarding best and most versatile agricultural land and soil.
- 2.6.2. Natural England consider that the sampling density within the Solar PV Panel Area is acceptable.
- 2.6.3. As stated in Natural England's Relevant Representations, it is best practice to complete all surveys pre-consent.
- 2.6.4. Whilst the requested changes to the assessment matrix/significant criteria were accepted by the applicant, it is agreed that following these changes effects to best and most versatile agricultural land will remain significant.
- 2.6.5. It is noted from the *The Applicant's Response to Relevant Representations (Part 1)* (Document Ref EXAM/9.1) that an updates version of ES Volume 1, Chapter 17: Soils and Agriculture will be submitted at Deadline 1 which it is stated will provide further information on the land take across the Solar PV areas, cable route corridor, and associated infrastructure. Further comments regarding to potential impacts to best and most versatile agricultural land can be provided by Natural England following the submission of this document.

For any further advice on this consultation please contact the case officer [REDACTED] and copy to consultations@naturalengland.org.uk.

Yours faithfully

[REDACTED]
Senior Sustainable Development Officer
Wessex Team