



Planning
Inspectorate

REPORT on the IMPLICATIONS for EUROPEAN SITES

Proposed Lime Down Solar Project

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

Planning Inspectorate Reference: EN010168

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1 INTRODUCTION

1.1 Background

- 1.1.1 Lime Down Solar Park Limited ('the applicant') has applied for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (PA2008) for the proposed Lime Down Solar Project ('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 6 (DL6) of the examination (21 August 2026). It is not a standalone document and should be read in conjunction with the examination documents referred to. Where document references are presented in square brackets [] in the text of this report, that reference can be found in the [Examination Library](#) published on the National Infrastructure [Project Website](#).
- 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 (SPAs), potential SPAs, listed and proposed Ramsar sites and sites identified or required as compensatory measures for adverse effects on any of these sites. For ease of reading, this RIES also collectively uses the term 'European site' for European sites as defined in The Habitats Regulations 2017, unless otherwise stated. The 'UK National Site Network' refers to SACs and SPAs belonging to the United Kingdom already designated under the Directives and any further sites designated under The Habitats Regulations.
- 1.1.5 This RIES is issued to ensure that IPs including the Appropriate Nature Conservation Body (ANCB) - Natural England (NE) - 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):

- Habitat Regulations Assessment Report [[APP-275](#)], updated at DL3 [[REP3-090](#)].

- 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:

- Change request dated June 2026 [[REP3-134](#)]. Four changes, comprising an extension of the Order limits at Lime Down D to allow emergency access to the BESS, realignment and removal of Solar PV Infrastructure from Lime Down C to allow for public right of way (PRoW) realignment and updates to the works plans to allow more flexibility in the detailed design of the interconnecting cable alignment.

- 1.3.2 No relevant HRA matters arose from these change requests.

1.4 HRA Matters Considered During the Examination

- 1.4.1 The examination to date has focussed on the following matters:

- The adequacy of the applicant's baseline data in relation to the cable route corridor.
- Whether Lime Down C constitutes functionally linked land for lesser horseshoe bats associated with the Bath and Bradford-on-Avon Bats SAC.

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. The scope of the assessment is set out in section 4 of the HRA Report.

Sites within the UK National Site Network (NSN)

- 2.1.2 The applicant's HRA Report [[APP-275](#)] identified 5 European site(s) within the UK National Site Network for inclusion within the assessment. These are listed in table 3 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-275](#)]

Name of European site	Distance from proposed development (km)
Bath and Bradford on Avon Bats SAC	12.56km south of Lime Down C / 3.77km west of Cable Route Corridor
Severn Estuary SAC / SPA / Ramsar	23.71km northwest of Lime Down A
Salisbury Plain SPA	27.89km southeast of Lime Down E

- 2.1.3 The locations of these sites relative to the proposed development are depicted on figure 1 of the HRA Report [[APP-275](#)].
- 2.1.4 Salisbury Plain SPA was scoped out of the assessment at the scoping stage due to both the distance from the Solar PV sites and because the habitats within the Order limits are disparate to the open chalk grassland which characterises Salisbury Plain.
- 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 The ANCB agreed [[REP1-156](#)] that all relevant European sites and European site features that could be affected by the project had been identified by the applicant.
- 2.1.7 Only sites within the UK NSN are addressed in this RIES.

2.2 Potential impact pathways

2.2.1 Sections 6.2 and 6.3 of the HRA Report detail the potential impacts from the proposed development, along with the potential geographical extent of effects. Tables 4 and 5 of the HRA Report list the sites and qualifying features and the impact pathways which could affect them.

Table 2.2 Pathways for Likely Significant Effects (LSE) assessed by the applicant

European site / qualifying feature	LSE pathway
Bath and Bradford-on-Avon Bats SAC	
Greater horseshoe bat, Lesser horseshoe bat, Bechstein's bat.	• Loss or change of functionally linked land (construction and decommissioning) • Fragmentation via severance of commuting routes due to direct habitat loss and / or lighting (construction and decommissioning) • Loss / damage to roosts (construction and decommissioning) • Killing and injury via impacts on roosts (construction and decommissioning) • Ongoing loss or change of functionally-linked land (FLL) (operation and maintenance)
Severn Estuary SAC	
Annex 1 Habitats (Estuaries, Sandbanks, Mudflats, Atlantic salt meadows, Reefs)	• Habitat degradation due to construction run-off or pollution (construction and decommissioning) • Habitat degradation due to operational run-off or pollution (operation and maintenance)
Annex 2 Species (Sea Lamprey, River Lamprey, Twaite Shad)	• Loss or change of habitat / FLL (construction and decommissioning) • Habitat degradation due to construction run-off or pollution (construction and decommissioning) • Fragmentation due to severance of migration routes through direct habitat loss or introduction of new obstacles to migration (construction and decommissioning)

European site / qualifying feature	LSE pathway
	• Killing and injury (construction and decommissioning) • Habitat degradation due to operational run-off or pollution (operation and maintenance)
Severn Estuary SPA	
Bewick's Swan, Greater white-fronted goose, Shelduck, Gadwall, Dunlin, Redshank, Waterbird Assemblage	• Loss or change of FLL (construction and decommissioning) • Ongoing loss or change of FLL (operation and maintenance)
Severn Estuary Ramsar	
Ramsar Criterion 5 and 6: Wintering bird assemblage of international importance and species / populations occurring at levels of international importance	• Ongoing loss or change of FLL (construction and decommissioning) • Ongoing loss or change of FLL (operation and maintenance)
Ramsar Criterion 1 and 3 (Immense tidal range and estuarine communities)	• Habitat degradation due to construction run-off or pollution (construction and decommissioning) • Habitat degradation due to operational run-off or pollution (operation and maintenance)
Ramsar Criterion 4 and 8 – Migratory fish (Salmon, Sea lamprey, River lamprey, Allis Shad, Twaite Shad)	• Loss or change of habitat / FLL (construction and decommissioning) • Habitat degradation due to construction run-off or pollution (construction and decommissioning) • Fragmentation due to severance of migration routes through direct habitat loss or introduction of new obstacles to migration (construction and decommissioning) • Killing and injury (construction and decommissioning)

European site / qualifying feature	LSE pathway
	Habitat degradation due to operational run-off or pollution (operation and maintenance)
Ramsar Criterion 4 and 8 – Migratory fish (European eel, Sea Trout)	- Loss or change of habitat / FLL (construction and decommissioning) - Habitat degradation due to construction run-off or pollution (construction and decommissioning) - Fragmentation (construction and decommissioning) - Killing and injury (construction and decommissioning) - Fragmentation via electro-magnetic fields (EMFs) (operation and maintenance)

2.2.2 The HRA Report assessed the potential impacts during construction, operation and maintenance and decommissioning. The applicant considered that all potential impacts during the decommissioning phase would be similar to, and potentially less than, those outlined in the construction phase [\[APP-275\]](#).

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

2.3 In-combination effects

2.3.1 Section 9 of the HRA Report [\[APP-275\]](#) detailed the applicant's approach to assessing in-combination effects. The projects included in the in-combination assessment were detailed in table 6 of the HRA Report [\[APP-275\]](#) and their locations depicted on ES figure 21-1 [\[APP-178\]](#).

2.3.2 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 are presented in section 7 of the HRA Report [\[APP-275\]](#).

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 following European site:
- Severn Estuary SPA
- 2.4.3 Natural England [[REP1-156](#)] confirmed it agreed with the applicant's conclusion of no LSEs in respect of the above European site.

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:
- Bath and Bradford-on-Avon Bats SAC
 - Severn Estuary SAC
 - Severn Estuary Ramsar
- 2.4.5 The qualifying features and LSE pathways screened in by the applicant are detailed in section 7.12 of the HRA Report [[APP-275](#)].
- 2.4.6 No matters have been raised in the examination to date in relation to the applicant's screening 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 (or not considered) by the applicant are summarised in table 2.3 below.

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

ID	Potential impact pathway	Details of issue	ExA observation / question
Bath and Bradford on Avon Bats SAC			
2.1	Fragmentation impacts to commuting lesser horseshoe bat habitats within Lime Down C – construction and decommissioning	The applicant's HRA Report [APP-275] concluded that land within the solar PV sites was not functionally linked to the Bath and Bradford-on-Avon Bats SAC. Natural England (NE) [REP1-156] raised concerns that the level and nature of lesser horseshoe bat activity recorded at Lime Down C suggested that it was difficult to determine that Lime Down C is not functionally linked to the SAC. NE therefore considered that, in the absence of mitigation, potential fragmentation of commuting habitat within Lime Down C should be screened into the Appropriate Assessment. The applicant [PDA-009] initially maintained that Lime Down C lay outside the recognised SAC impact zones and was unlikely to constitute FLL for lesser horseshoe bats, although discussions with NE continued. At Deadline 1, NE [REP1-156] confirmed that agreement had not yet been reached and reiterated its view that Lime Down C should be treated as FLL. Despite this disagreement, both parties agreed on mitigation measures that would avoid significant fragmentation effects on SAC lesser horseshoe bats. Following further discussions, the applicant [REP3-128] agreed to assess Lime Down C as potentially functionally linked to the Bath and Bradford on Avon Bats SAC. NE subsequently confirmed that both parties had reached a shared position that Lime Down C	N/A – matter resolved

		should be regarded as FLL for lesser horseshoe bats associated with the SAC. This agreement was recorded in the SoCG between the applicant and NE [REP2-026] and reflected in the revised HRA Report [REP3-090] . NE advised [AS-018] that, with the agreed mitigation secured through the DCO, the proposed development would not result in adverse effects on the integrity of the SAC from the loss or fragmentation of FLL.	
2.2	Bat surveys within the Cable Route Corridor (CRC)	In response to concerns from Wiltshire Council regarding survey coverage within the CRC, as highlighted in its SoCG with the applicant, the Examining Authority [PD-014], ExQ1 HRA2.1] sought confirmation from NE that (i) sufficient survey information was available to assess effects on Annex II bat species associated with the Bath and Bradford-on-Avon Bats SAC and (ii) whether targeted bat activity surveys within the CRC would be likely to have materially influenced the conclusions of the HRA. NE [REP5-140] confirmed that the survey approach was proportionate given the temporary nature of construction impacts and habitat reinstatement following construction works and was sufficient to assess impacts on Annex II bat species associated with the Bath and Bradford on Avon Bats SAC. NE [REP5-140] further advised that temporary hedgerow gaps of up to 10 m would be unlikely to adversely affect bat commuting behaviour, including that of Annex II species. NE noted Wiltshire Council's comments regarding hedgerow removal in their SoCG with the applicant and agreed that all hedgerow removal areas should be clearly marked in the relevant submitted documentation. Regarding whether targeted bat activity surveys within the CRC would be likely to have materially influenced the conclusions of the HRA, NE [REP5-140] confirmed that given the agreed avoidance	N/A – matter resolved

		and mitigation measures, NE does not consider that targeted bat activity surveys within the CRC would have a material influence on the conclusions of the HRA.	
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3 CONCLUDING REMARKS

- 3.0.1 This RIES is based on information submitted throughout the examination by the applicant and IPs, up to DL6 (21 August 2026) of the examination 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 Severn Estuary SPA / SAC / Ramsar Site and Bath and Bradford on Avon Bats SAC. The ExA's understanding of the applicant's and NE current positions in relation to LSEs is set out above.
- 3.0.3 Comments on the RIES must be submitted for DL7 (2 October 2026).