

Wiltshire Council Planning Consultation Response

ECOLOGY

Officer name:	Jessica Cracknell
Date:	12/05/2026 06/07/2026 11/08/2026 updated comments
Application Number:	PL/2025/09332
Proposal:	Erect 2 x 20 photo-voltaic (PV) panels along with a surface duct to transmitter container
Site Address:	Transmitter at 1 Camp Hill, Salisbury, SP2 0QA
Case Officer:	Kate Clements

Recommendations:

☐	No Comment
☐	Support
☐	No objection
☐	Condition (no objection subject to conditions)
☒	Objection - further information required
☐	Objection in principle
☐	HRA.

Further Information Required:

	Issue	Policy/Legislative Compliance	Date information requested & Further information required	Satisfactorily addressed (Document & Date submitted)
1	Biodiversity Net Gain (BNG)	Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021)	12/05/2025 06/07/2026 11/08/2026 Submission of statutory metric calculation with the correct baseline habitats, condition assessments and associated baseline habitat plans (see comments in main text)	NO

The outstanding document(s) listed above are needed to enable the council's ecology team to consider all the relevant impacts and benefits of the proposed scheme. The council's ecologists will provide a further response once all the above information has been submitted via the case officer.

Please Note: When resubmitting a revised document, ALL changes must be highlighted to enable review.

Thank you for your consultation on the above application. I have reviewed the submitted documents against OS maps, aerial photographs of the site and surrounding area, together with GIS layers of statutory and non-statutory designated sites and existing records of protected species.

The following submitted documentation was reviewed to inform this response:

- Record 31941688 Baseline. 11 June 2026. Owen Crawshaw;
- RE: Biodiversity Net Gain – response to the Ecology consultation response dated 12th May 2026 Application PL/2025/09332). 17 June 2026. The Ecology Co-op Additional BNG information;
- Block Plan. Bespoke Architects. 25.347. Drawing No. P02A;
- PV Panels Plan & Elevations. Bespoke Architects. 25.347. Drawing No. P03;

- Planning Application Statement: Installation of Solar PV Panels at Existing Radio transmitter site. Final V1.1.

Habitat Regulations Assessment: River Avon Special Area of Conservation (SAC) Hampshire Catchment

This development falls within the catchment of the River Avon SAC and has potential to cause adverse effects alone or in combination with other developments through discharge of phosphorus in wastewater. Appropriate Assessment must be carried out by the relevant Competent Authority (the LPA) to determine the potential significant effects and the suitability of any measures proposed to avoid or mitigate those effects.

A test of likely significance has been conducted by the relevant Competent Authority (Wiltshire Council). This assessment determined that, due to the nature of the development with no net increase in dwellings and the lack of any increase in water supply, drainage installation within this development, there will be no mechanism for effect on the River Avon SAC. The Habitat Regulation Assessment (HRA) has concluded that the application is not likely to have significant impacts on the River Avon SAC and the proposal is screened out of Appropriate Assessment.

Biodiversity Net Gain

This application was submitted after Biodiversity Net Gain (BNG) becoming mandatory however information required for applications subject to the biodiversity gain condition has not been submitted. The development proposal does not meet the requirements for a de-minimis exemption.

According to Government guidance and the Biodiversity Gain Requirements (Exemptions) Regulations 2024, the de-minimis exemption applies to developments that:

- does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and
- impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric).

Impact could be defined as any activity which may cause the loss, damage, or degradation of a habitat that could lead to a decrease in biodiversity value, as calculated using the statutory biodiversity metric tool. CIEEM's Guidelines for Ecological Impact Assessment in the UK & Ireland emphasise that ecological impacts arise from changes that degrade environmental quality such as habitat loss. Examples of 'impact' include:

- Direct habitat loss i.e. removing grassland, scrub or trees for construction, paving a parking area, or even excavating part of a hedgerow to create an access point.
- Structural changes i.e. soil compaction, disturbing root systems with construction works, **erecting new structures which may shade out existing vegetation and fragmenting habitats.**

It is accepted that habitat beneath solar panels should be recorded as the habitat present and not classified as '*developed land; sealed surface*'. This is not disputed within the consultation response. The key issue is whether installation of the solar panels would result in the loss, damage or degradation of habitat and consequently a reduction in biodiversity value. The Planning Advisory Service identifies habitat degradation, including shading and structural changes, as a form of "impact" for the purposes of the de minimis exemption, as stated above. The information provided within the *RE: Biodiversity Net Gain – response to the Ecology consultation response dated 12th May 2026 Application PL/2025/09332* document identifies that the habitat beneath the solar panels will differ from the existing baseline habitat. The existing habitat beneath the proposed panels has been classified as '*other neutral grassland (g3c)*', whereas the Natural England advice referenced within the provided document states that habitat beneath solar panels should be recorded as '*modified grassland in poor condition*'. This indicates a change in habitat type and/or condition from the existing baseline. Such a change would represent a reduction in habitat quality and ecological functionality within the area occupied by the solar array and therefore constitutes habitat degradation.

Sufficient ecological evidence is required to substantiate the reliance on the de-minimis exemption. Such evidence would be expected to include:

- Habitat condition assessments;
- Botanical species lists;
- Quadrat survey data and supporting analysis;

- Evidence demonstrating that habitat quality and biodiversity value beneath the array will be maintained following development; and/or
- A completed statutory biodiversity metric.

The submitted documentation and cited guidance do not support the conclusion that habitat beneath the panels can be excluded from consideration when assessing ecological/biodiversity impacts. Insufficient ecological evidence has been provided to demonstrate that the existing area of 'other neutral grassland' will retain its current condition and biodiversity value following installation of the solar array. The area subject to potential impact extends beyond the ground contact of the mounting and the cable duct and encompasses the full extent of the array where habitat degradation will occur. The total area of this solar array exceeds 25sqm according to the block plan, so the de-minimis exemption does not apply. A biodiversity metric and accompanying ecological information submitted with a planning application should clearly identify any potential impacts. In the absence of sufficient evidence to justify the exemption, the proposal should be treated as development subject to the biodiversity gain condition.

Applications subject to the biodiversity gain condition must be accompanied by minimum information set out in [Article 7 of The Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#), which includes:

- [the completed metric calculation tool](#) showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;
- a description of any [irreplaceable habitat](#) (as set out in [column 1 of the Schedule to the Biodiversity Gain Requirements \(Irreplaceable Habitat\) Regulations 2024](#)) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).

Note: this is a summary, please refer to Paragraph: 011 [Biodiversity net gain - GOV.UK](#) for full details.

If the applicant considers that the development would not be subject to the biodiversity gain condition, Schedule 7A of the Town and Country Planning Act 1990 the applicant must provide a statement as part of the planning application setting out the reasons why they believe this is the case, supported by appropriate evidence and informed professional judgement. Submission of a completed metric calculation tool may be necessary to evidence the statement.

The additional information submitted in support of the de minimis exemption has been reviewed, including the baseline habitat classification and species list. The information confirms the baseline habitat within the area occupied by the proposed solar array as Other Neutral Grassland (g3c) in poor condition. Whilst it is acknowledged that this information assists in establishing the baseline habitat present on site, it does not resolve the previously stated concerns identified (consultation response dated 06/07/2026 and 12/05/2026).

Insufficient evidence has been provided to demonstrate that the de minimis exemption criteria has been met. In particular, it has not been demonstrated that the habitat beneath the proposed solar array will retain its existing biodiversity value following development. No quadrat survey data, post-development habitat condition assessment, statutory biodiversity metric calculation, or other ecological evidence has been submitted to demonstrate this. The Council cannot conclude that impacts are limited solely to the ballast blocks and cable route footprint. The area of potential impact therefore remains the full extent of the solar array where habitat degradation may occur. As this area exceeds 25m², the de minimis exemption has not been demonstrated. In the absence of sufficient evidence to justify the de minimis exemption, the development should be treated as being subject to the biodiversity gain condition. **The application has not been accompanied by the biodiversity information required by Article 7 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 and Schedule 7A of the Town and Country Planning Act 1990. The Local Planning Authority is therefore unable to assess the biodiversity impacts of the proposal or determine compliance with mandatory Biodiversity Net Gain requirements.**

Core Policy 50

Core Policy 50 of the Wiltshire Core Strategy requires all development to demonstrate no net loss of biodiversity and to seek opportunities to enhance biodiversity. The NPPF also encourages applications to

deliver measurable net gains (para 186 d). It is anticipated that all developments will deliver no net loss of biodiversity. For this application, biodiversity measures should focus on delivering continued ecological functionality for birds, bats and hedgehogs.

All details on exact locations and specifications must be added to all working plans (see condition below) and will become an enforceable part of the planning permission to avoid oversight and to ensure consistency and enforceability. Integrated features are generally maintenance-free and seek to benefit a target species/s or group/s and should demonstrate viability in terms of position on the building, location and clustering in accordance with relevant guidance and the additional features.

Insufficient information has been submitted. In carrying out its statutory function, the LPA must be reasonably sure that the proposal will not result in significant adverse effects on protected habitats or species. The information outlined above must therefore be submitted and reviewed by the LPA's ecology team prior to determination of the application. I therefore maintain a holding objection until all the issues listed above have been suitably addressed.

CONDITIONS: these will be added once the issues above have been addressed

Sign off by WC Ecologist will only be given once ALL outstanding information has been submitted and agreed sufficient.

Ecologist	Date