



www.jbaconsulting.com

JBA
consulting

Stourhead Garden Lake - Planning, Design and Access Statement

Final

Prepared for
The National Trust

Date
March 2026



National
Trust

Document Status

Issue date	04/03/2025
Issued to	National Trust
BIM reference	PXG-JBA-EN-PL-TP-XX-0001-S0-P01.03- Planning_Design_and_Access
Revision	S0-P1.07
Prepared by	Jamie McDonald MSci, Licentiate RTPi Landscape Planner
Reviewed by	Iain Armstrong BA, Dip Town Planning MRTPI Principal Planning Consultant
Authorised by	Della Adams HND Arb. MSc MRTPI Technical Director (Planning)

Carbon Footprint

The format of this report is optimised for reading digitally in pdf format. Paper consumption produces substantial carbon emissions and other environmental impacts through the extraction, production and transportation of paper. Printing also generates emissions and impacts from the manufacture of printers and inks and from the energy used to power a printer. Please consider the environment before printing.

Accessibility

JBA aims to align with [governmental guidelines on accessible documents](#) and [WGAG 2.2](#) AA standards, so that most people can read this document without having to employ special adaptation measures. This document is also optimised for use with assistive technology, such as screen reading software.

Contract

JBA Project Manager	Stephen Watkins MSci PhD
Address	West Point Business Park, Peterborough, PE26GG
JBA Project Code	2025s0768

This report describes work commissioned by the National Trust. Jamie McDonald of JBA Consulting carried out this work.

Purpose and Disclaimer

Jeremy Benn Associates Limited (“JBA”) has prepared this Report for the sole use of (insert the “Client”) and its appointed agents in accordance with the Agreement under which our services were performed.

JBA has no liability for any use that is made of this Report except to The National Trust for the purposes for which it was originally commissioned and prepared.

No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by JBA. This Report cannot be relied upon by any other party without the prior and express written agreement of JBA.

JBA disclaims any undertaking or obligation to advise any person of any change in any matter affecting the Report, which may come or be brought to JBA’s attention after the date of the Report.

Copyright

© Jeremy Benn Associates Limited 2026

Contents

1	Introduction	4
1.1	Context	4
1.2	Purpose of this Report	4
2	Development Site	5
2.1	Location	5
3	Proposed Development	6
3.1	Description	6
3.2	History of Minor Repair and Maintenance Works	7
4	Project Development	9
4.1	Sheet Pile Wall Selection	9
4.2	Sinkhole	Erro
	r! Bookmark not defined.	
4.3	Footpath	9
4.4	Options	9
5	Design and Access	11
5.1	Design	11
5.2	Access	11
5.2.1	Construction Access	11
5.2.2	Pedestrian Access	12
5.2.3	Temporary Works and Reinstatement	12
6	Stakeholder Engagement	13
7	Planning History	14
8	Planning Policy Context	15
8.1	National Planning Policy	15
8.1.1	National Planning Policy Framework (NPPF)	15
8.1.2	Planning Practice Guidance (PPG)	15
8.1.3	Biodiversity Net Gain (BNG) Regulations 2024	16
8.2	Local Planning Policy	16

8.2.1	Wiltshire Core Strategy 2015-2026	16
8.2.2	Wiltshire Local Plan Review	17
8.3	8.3 Other relevant legislation and policy	18
8.3.1	Reservoirs Act 1975	18
8.3.2	Wiltshire Biodiversity Action Plan 2008	18
8.3.3	Local Nature Recovery Strategy for Wiltshire and Swindon	18
8.3.4	Wiltshire Landscape Character Assessment	18
8.3.5	Cranborne Chase Partnership Plan 2019-2024	18
9	Planning Policy Review and Material Planning Considerations	19
9.1	Arboriculture	19
9.2	Ecology and Biodiversity	20
9.3	Protected Species	21
9.3.1	Birds	21
9.3.2	Bats	22
9.3.3	Badgers	23
9.3.4	Water Vole	23
9.3.5	Otter	23
9.3.6	Great Crested Newt	23
9.3.7	Reptiles	24
9.3.8	Fish	25
9.3.9	Invasive Non-Native Species	25
9.4	Landscape and Visual	26
9.5	Water quality and flood risk	26
9.6	Heritage and Archaeology	27
10	Construction	29
10.1	Timescale	29
10.2	Methodology	29
10.2.1	Sequence of works	29
10.3	Impacts	30
11	Conclusions	31
12	References	32

List of Figures

Figure 2-1 Garden Lake site location	5
Figure 3-1 View along Garden Lake Embankment Crest	6
Figure 3-2 Location of defects	8

List of Tables

Table 1-1 Proposed Development Site Planning History	14
--	----

Abbreviations

BNG	Biodiversity Net Gain
CEMP	Construction Environmental Management Plan
CS	Core Strategy
DEFRA	Department for Environment Food and Rural Affairs
EclA	Ecological Impact Assessment
FRA	Flood Risk Assessment
HIA	Heritage Impact Assessment
HIS	Habitat Suitability Index
INNIS	Invasive Non-Native Species
LP	Local Plan
LNRS	Local Nature Recovery Strategy
LWS	Local Wildlife Site
MIOS	Measures in the Interests of Safety
NL	National Landscape
NPPF	National Planning Policy Framework
PEA	Preliminary Ecological Appraisal
SSSI	Site of Special Scientific Interest
WFD	Water Framework Directive

1 Introduction

1.1 Context

JBA Consulting has been commissioned by the National Trust to undertake a Detailed Design and prepare and submit a planning application in relation to works at Garden Lake, within the National Trust Stourhead Estate.

1.2 Purpose of this Report

This Planning, Design and Access Statement forms part of the planning application submission for full planning. It provides details of the proposals in relation to the site, setting, design and access arrangements. It assesses the proposals against the relevant planning policies and other material considerations. This statement should be read in conjunction with the other documents and drawings submitted as part of the planning application.

It provides information in relation to:

- The scheme objectives;
- The key features of the scheme;
- The character and context of the scheme area including opportunities and constraints;
- Relevant planning policies;
- Details of consultations with stakeholders that have informed the design and development of the scheme;
- The design proposals, including design principles and concepts and how these have evolved; and
- How access requirements are being met.

At the time of submission, work on site has begun de-mobilisation as construction and implementation of the proposal have been completed. This application is therefore made to regularise the development in accordance with Section 73A of the Town and Country Planning Act 1990 (as amended), which enables the local planning authority to grant planning permission for development that has already been carried out.

The Stourhead Garden lake is designated as a High Risk, Large Raised Reservoir under the Reservoirs Act 1975. The proposed works were required to address statutory Measures in the Interests of Safety (MIOS) relating to seepage and overtopping of the dams at the tarn. An inspection report under Section 10(2) of the Reservoir Act was submitted on the 17th of July 2023, giving up to three years to complete the MIOS work. Due to a new manifestation of the existing defect appearing (the sinkhole), addressing the problem became more urgent, hence the retrospective application.

The works began on 12th of January 2025 and were completed on 13th of March. On-site works were approximately 9 weeks. 3 months of re-certification period once completed.

2 Development Site

2.1 Location

The Garden Lake is a reservoir in the headwaters of the River Stour in Stourton, Wiltshire (Figure). The centre of the site is located at National Grid Reference ST 771 339 and the nearest postcode is BA12 6QB.

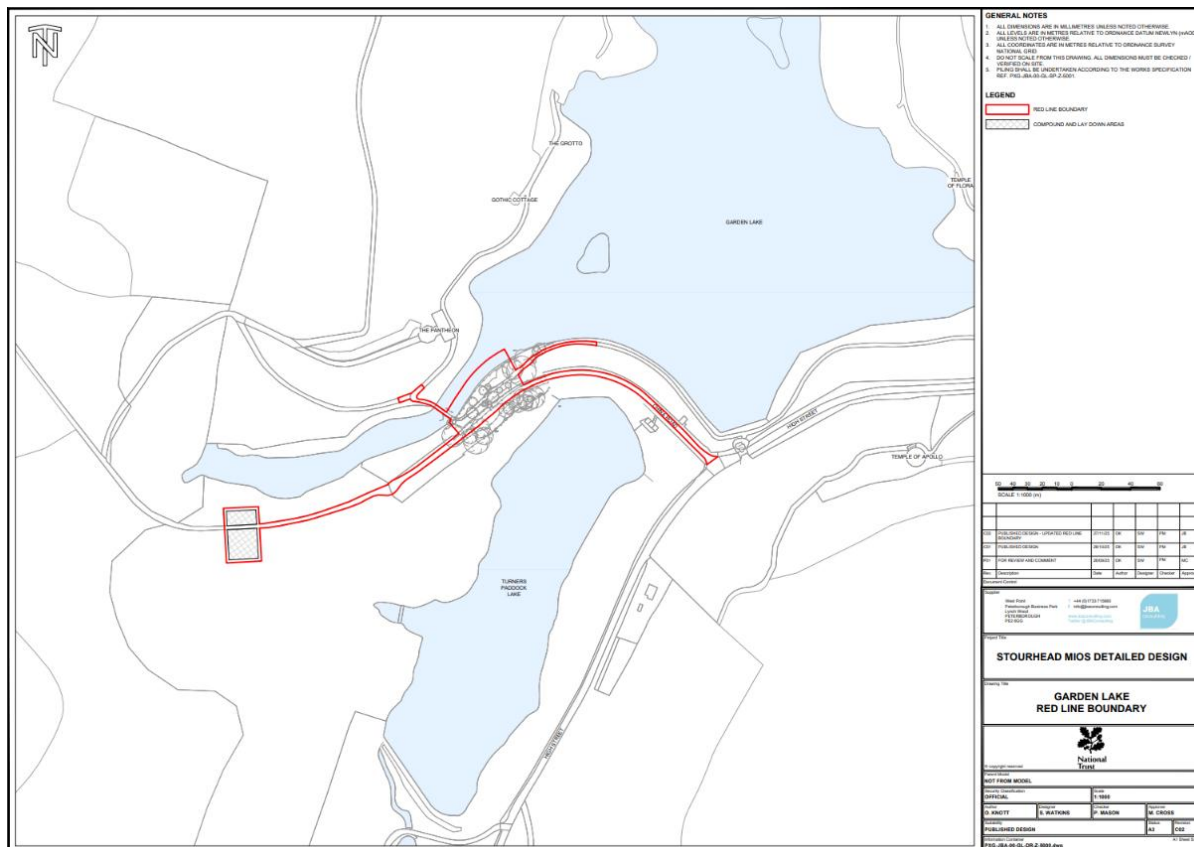


Figure 2-1: Garden Lake site location

The proposed development location has various national and local designations that have been considered across the undertaken environmental assessments. The protection and integration of the proposed development has been considered in relation to the following land designations.

- National Landscape (NL)
- SSSI Impact Risk Zones extending from Heath Hill Farm
- Registered Park and Garden - Stourhead
- Conservation Area - Stourhead
- Other, such as Kenwalch's Castle to the west of the proposed development site.

3 Proposed Development

3.1 Description

The proposed scheme aims to rectify the observed seepage issues that are draining from the Garden Lake in the Stourhead Estate. The western end of Garden Lake is suffering from seepage (:), to resolve this, the following works have been undertaken:

- Installation of a 4m long sheet pile wall for approximately 55m along the crest of the embanked western arm of the Garden Lake.
- Remediate existing sinkholes at the western end of Garden Lake by excavating and backfilling.
- Reinstatement of the existing footpath after works

The works are described on the planning application form as follows:

'IMPROVEMENTS AND REPAIR TO GARDEN LAKE ALONG CREST OF THE EMBANKED WESTERN ARM OF THE LAKE AND REMEDIATION OF SINKHOLE BY EXCAVATING AND BACKFILLING.'



Figure 3-1: View along Garden Lake Embankment Crest

The works undertaken included sheet-piling approximately 55 metres along the crest of the western embankment to approximately 4 metres below ground level, to the height of the embankment . The sheet pile line can be seen on Drg. PXG-JBA00-GL-DR-Z-5001 GardenLakeGeneralArrangement Sheet piles were installed using an attachment to an excavator. A temporary gravel working platform with a separator geotextile at the base was built along the embankment edge to provide access for the excavator.

In addition, localised earthworks remediation took place within the working area to remediate any sinkholes. The sinkholes were excavated to their base before suitable earthwork material was placed and compacted. Topsoiling and landscape remediation followed. The approximate location of the earthwork remediation can be seen on Drg. PXGJBA-00-GL-DR-Z-5001-GardenLakeGeneralArrangement.

Water levels of the shallow western arm of the main lake body were dropped by approximately 1-2 metres to allow access to the western arm embankment. This was achieved through the main drainage network and spillway. Given the small-scale nature of the works in relation to the size of the main lake body, the water level drop of the western arm did not impact the main lake body. Water levels of the Lake regularly fluctuate, with the National Trust often engaging the drainage network to reduce water levels of the main lake body.

The works began on 12th of January 2025 and were completed on 13th of March. On-site works were approximately 9 weeks.

Stourhead Garden Lake Reservoir is designated under the Reservoirs Act 1975 and is therefore subject to statutory safety regulation. An inspection by a qualified engineer has identified Measures in the Interest of Safety (MIOS) relating to seepage present from the reservoir; as such, these legally need to be rectified to ensure the continued safe operation of the reservoir and to reduce risks associated with internal erosion. Due to a new manifestation of the existing defect appearing (the sinkhole), addressing the problem became more urgent, hence the retrospective application. Whilst the works are MIOS, planning permission is still required for them. The application seeks consent to undertake these essential safety works, which are designed to address seepage issues while minimising environmental and visual impacts.

3.2 History of Minor Repair and Maintenance Works

Seepage has been a historic issue along the western arm embankment; several phases of remedial works have been undertaken to mitigate the seepage. Previous remedial measures include the following:

- In 1987 the core was re-puddled to a depth of 1.40m over a 35m length along the western bank.
- In 1988 an additional 20m section of the clay core was re-puddled along the western arm of the embankment. Counterfort and toe drains were also installed.
- In 1994, the 25m embankment section east of the Iron Bridge was re-puddled to a depth of 0.80mbgl.
- The Iron Bridge bank seat was reconstructed in 1995/6.
- In 2001 the clay core west of the iron bridge was re-puddled (last remaining section of the western arm embankment – all embankment sections have been repaired since 1984).

- In 2007, a section approximately 30m northeast of the Iron Bridge was re-puddled. While the location of the defect which was the driver of these works is known, the extent of the repairs is unknown.
- In c. 2010 a drain was installed at the toe of the upper bank to intercept seepage flows and discharge them onto China Road.
- While the 2007 works appear to have been largely successful, seepage has continued within the area remediated in 1994 (Figure 3-2).

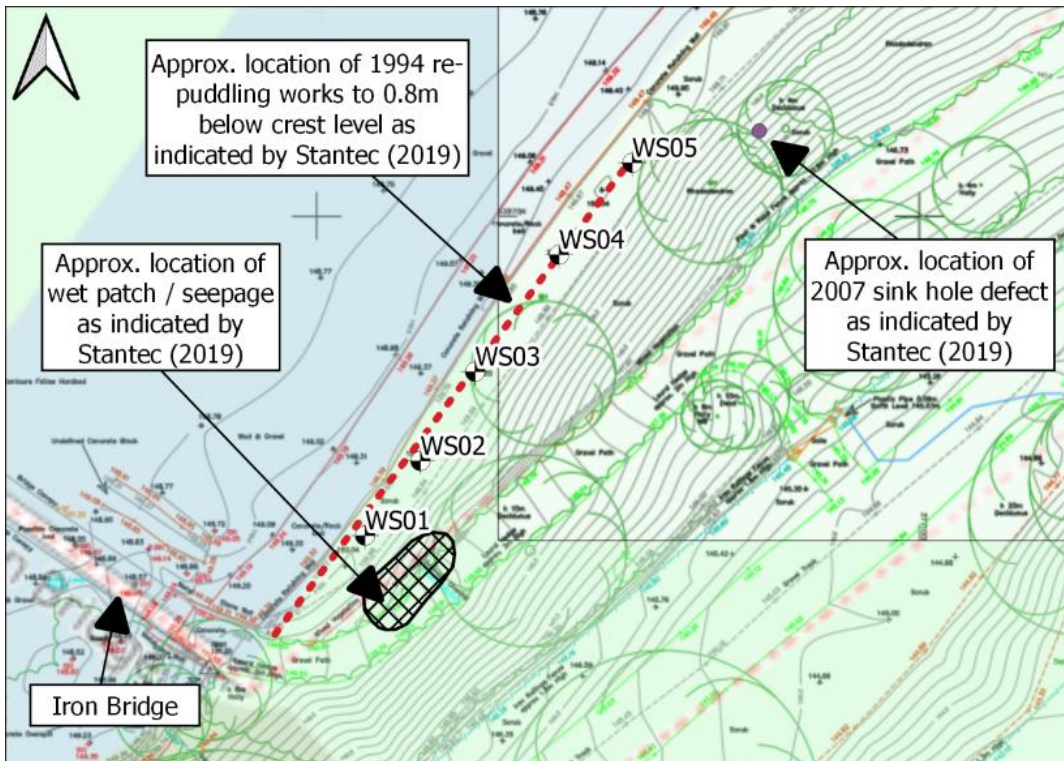


Figure 3-2: Location of defects

4 Project Development

4.1 Sheet Pile Wall Selection

As part of the works to assess the seepage problem at Garden Lake subsequent to the MIOS, JBA were instructed to provide an optioneering presentation for remedial works to the Client (Ref: 2021s0541 - Garden Lake Optioneering Report, dated August 2024).

The optioneering highlighted two main methodologies for reducing the seepage risk, comprising excavating and re-puddling the clay core over a length of 40m or the installation of a sheet-piled wall. Several variations of the sheet-piled wall remedial solution were presented, generally varying the length and position of the sheet-piled wall in order to address the immediate seepage issue and/or potential long-term seepage issues.

The National Trust reviewed the optioneering report and, through a subsequent internal assessment process, selected the option of the construction of a sheet pile wall over an approximate length of 40m along the western arm of the Garden Lake Reservoir within the centre of the crest. However, during detailed design, this was extended to approx. 55m long to ensure a tie in with a suspected clay core westwards of the Iron Bridge and to extend eastwards to the location of the outlet chamber of the new toe drain.

4.2 Earthwork Remediation

The sinkhole was repaired during the works. The sinkhole was excavated and then backfilled in layers. In addition, a small depression adjacent to the sinkhole was excavated and backfilled in layers.

4.3 Footpath

As part of the works, the sheet pile wall was installed across the existing footpath. In order to enable this, the existing footpath was excavated, forming a trench of approximate width 500mm at the eastern crossing of the iron bridge. Following installation of the sheet pile wall, the path was resurfaced as per the existing surfacing. This was determined through the Client providing the previous construction requirements.

4.4 Options

A study was undertaken and evaluated 4 options to remediate the issues identified:

1. Installation of an interlocking steel sheet pile wall;
2. Excavation and re-puddling of the clay core;
3. Installation of a cement bentonite slurry cut-off wall; and,
4. Installation of a geomembrane liner to the upstream face

A review of the relative advantages and disadvantages of each option concluded that Options 1 and 2 were the most appropriate solutions. This included consideration of environmental and heritage impacts, cost, construction time, construction supervision, weather risk, effective cut-off and reservoir levels.

Both options have a proven track record in preventing leakage through cores in embankment dams.

5 Design and Access

5.1 Design

The engineering solution comprised the installation of an approximately 55m long sheet pile wall, installed along the crest of the western arm embankment, with remediation of a sinkhole and depressed area. The sheet piles extend approximately 4m below ground level and were installed as shown on Drawing PXG-JBA-00-GL-DR-Z-5001 GardenLakeGeneralArrangement.

The design responds to the sensitive nature of the site, which is located within a Registered Park and Garden, a Conservation Area, NL, and in proximity to other designated heritage assets, including the Iron Bridge (Grade II). The chosen design option, following the optioneering process set out in Section 4, represents the most appropriate solution in balancing technical effectiveness, constructability and the need to minimise environmental and heritage impacts.

Key design considerations included:

- Ensuring the proposed method effectively mitigates ongoing seepage and prevents future internal erosion.
- Minimising excavation and disturbance to the existing embankment structure and historic landscape elements.
- Ensuring that the sheet piles remain entirely below ground level following reinstatement, resulting in no visible permanent structure after construction.
- Minimising construction duration to reduce disturbance to the landscape, ecology and estate operations.
- Ensuring full reinstatement of the footpath, embankment crest and surrounding landscape following completion of the works.

Following installation, topsoil was reinstated over the sheet piles and remediated earthwork areas, and the working platform will be removed. The embankment was reseeded, and the landscape will be allowed to return to its existing condition. No long-term alteration will occur to the visual character of the proposed development site, maintaining the wider area's character reflecting its uses and designations.

5.2 Access

5.2.1 Construction Access

Construction access was taken from High Street Road onto China Road, which provides direct access to the western arm of Garden Lake. China Road runs parallel to the works area and offers sufficient width and capacity for construction vehicles, deliveries and plant movement.

Temporary fencing was erected around the working area to ensure safety. Track matting was installed where required to enable plant access and to protect the ground surface.

Access for residents served by China Road, including Beech Cottage, was maintained at all times. Any temporary closures required were coordinated with the National Trust.

5.2.2 Pedestrian Access

The existing footpath crossing the Iron Bridge and along the embankment were temporary closed to allow installation of the sheet piles. The footpath surfacing was removed to enable excavation of a narrow trench for the sheet piles. Temporary arrangements were implemented as required to maintain safe pedestrian movement around the lake; however, the bridge was closed for the duration of the works. The footpath was reinstated to match existing levels, material and appearance after works had been completed.

5.2.3 Temporary Works and Reinstatement

Temporary construction phase works included a gravel working platform, vegetation removal, protective fencing and temporary storage areas. These works are entirely reversible to existing conditions. Upon completion of the onsite works:

- The working platform and all temporary materials were removed.
- The embankment crest was reinstated.
- The wave wall and iron railings were reinstated where removed.
- Topsoil was replaced and seeded.
- All disturbed areas were returned to their existing appearance and condition.

The development has therefore been designed to ensure that, once complete, no permanent above-ground structures remain and the site continues to contribute to the character and setting of the Registered Park and Garden.

6 Stakeholder Engagement

Pre-application discussions took place with Richard Hughes from the Planning Department (Wiltshire Council), Jocelyn Sage from the Cultural Heritage Team (Wiltshire Council) and Roland Smith (Wiltshire County Archaeologist). These discussions were carried out by the client, the National Trust. These discussions confirmed that conclusions regarding the impact on buried archaeology are reasonable.

Consultation has also been undertaken with Joe McAllister, Landscape Architect with Historic England, who confirmed that Historic England has no additional concerns regarding the proposals and recommended that a watching brief, undertaken by a suitably qualified archaeologist, is undertaken during any ground-breaking works.

Due to the expedient nature of the works and the safety requirement (MIOS) a Watching Brief wasn't undertaken. However, mitigation was carried out to prevent effects on built heritage. Mitigation is discussed in section 9.6. The area was described as having a low archaeological potential, as discussed in the PXG-JBA-00-GL-RP-HE-4001-A3-C01-Heritage_Impact_Assessment.

7 Planning History

The proposed development site has been subject to multiple applications. The most relevant applications are shown in Table 7-1.

Table 7-1 Proposed Development Site Planning History

App. No.	Address	Description	Status
S/2006/2283	STOURHEAD HOUSE, STOURTON, WARMINSTER, BA126QH	REDUCE HEIGHT OF IRON BRIDGE DAM TO STOURHEAD LAKE	Withdrawn - 29/12/2006
S/2006/2366	THE IRON BRIDGE, STOURHEAD HOUSE, STOURTON, WARMINSTER, BA126QH	ENGINEERING WORKS TO REDUCE THE HEIGHT OF THE DAM AT THE IRON BRIDGE	Granted - 09/01/2007
PL/2025/0755 3	Land forming the footpath network surrounding the Garden Lake at Stourhead, Wiltshire, BA12 6QD	Footpath improvement works including associated engineering and landscaping works and new benches.	Under consideratio n
PL/2025/0956 2	STOURTON HOUSE, HIGH STREET, STOURTON, WARMINSTER, BA12 6QF	G001 Cherry Laurel - Fell and replacement plant. G002 Holly/C. Laurel - Cut back north east side (footpath) by up to 1.5m to afford a separation clearance of up to 2m from path edge. G004 Mixed Broadleaf - Crown lift over access track, to afford a clearance height of up to 5m from ground level of track. T012 T013 T015 Rhododendron - Fell. T014 Box - Fell. T016 T017 T018 Holly - Fell. T019 Yew - Prune back branching on north and west side (footpaths) by up to 1.5m, retaining branch lengths at approximately 1m. T033 Beech - Crown lift over access track, to afford a clearance height of up to 5m from ground level of track.	Granted - 12/01/2026

8 Planning Policy Context

8.1 National Planning Policy

8.1.1 National Planning Policy Framework (NPPF)

The latest version of the NPPF was published in December 2024 (although consultation is currently ongoing on a revised NPPF). It sets out the Government's planning policies for England and how these should be applied. The NPPF is a material consideration in planning decisions and should be read as a whole (including its footnotes and annexes). The NPPF sets out the vision for sustainable development based on inter-dependent economic, social and environmental roles and includes policies on flood risk, conserving and enhancing the natural environment (including biodiversity) and the historic environment.

Chapter 14 - Meeting the challenge of climate change, flooding and coastal change sets out that the planning system should take full account of all climate impacts, including storm and flood risk and coastal change. Paragraphs 173 to 176 of this chapter set out the sequential approach to development in areas at higher risk from flooding, and paragraph 181 sets out that when determining planning applications, it should be ensured that flood risk is not increased elsewhere, and where appropriate, planning applications should be supported by a site-specific flood risk assessment (FRA).

Chapter 15 - Conserving and enhancing the natural environment sets out ways that planning policies and decisions should protect and enhance the natural and local environment. Great weight should be given to conserving and enhancing the landscape and scenic beauty in National Parks. The conservation and enhancement of wildlife and cultural heritage should be given great weight in National Parks. Chapter 15 also requires minimising impacts on and providing net gains for biodiversity.

Chapter 16 - Conserving and enhancing the historic environment at paragraph 207 sets out that applicants should be required to describe the significance of any heritage assets affected, including any contribution made by their setting. Paragraph 215 goes on to state that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. Paragraph 219 explains that within World Heritage Sites and their setting, proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. Paragraph 220 explains that not all elements of a World Heritage Site will necessarily contribute to its significance.

8.1.2 Planning Practice Guidance (PPG)

In March 2014, the then Government launched the PPG web-based resource. The PPG has been periodically updated since then and contains important information for users of the planning system that was previously published in separate documents and guidance

notes and expands on policy in the NPPF. The PPG includes guidance on flood risk, Biodiversity Net Gain (BNG) and the historic environment.

8.1.3 Biodiversity Net Gain (BNG) Regulations 2024

The DEFRA user guide to The Statutory Biodiversity Metric (July 2024) sets out that you do not need to record a habitat as lost where there are temporary impacts to a habitat and the area can be restored within two years.

However, the proposed works have been undertaken retrospectively, with on-site construction being completed by the time of submission. Thus, removing the need to comply with BNG Regulations.

8.2 Local Planning Policy

8.2.1 Wiltshire Core Strategy 2015-2026

The Wiltshire Core Strategy (CS) was adopted in January 2015 and outlines the strategic, overarching planning policy framework in Wiltshire.

Core policy 50 Biodiversity and Geodiversity - requires the mitigation hierarchy to be applied, supports proposals which conserve biodiversity and ecosystems and requires proportionate and appropriate BNG to be secured.

As mentioned above, the BNG Regulation (section 8.1.3) is not relevant as the application has been completed retrospectively. However, an indicative BNG of 28.34% has been estimated from the development

Core Policy 51 Landscape - requires the highest level of protection to be given to the landscape of Wiltshire Council. Local landscape is identified through landscape character assessment, vegetation, waterbodies, geological and topographical features, cultural, historic and heritage assets.

Core Policy 52 Green infrastructure – protect and enhance existing green infrastructure. If removal of green infrastructure is unavoidable, then the creation or replacement of green infrastructure equal to or greater in the existing area and quality is required.

Core Policy 57 Ensuring high quality design and place shaping - proposal must demonstrate that it makes a positive contribution to the character of Wiltshire Council. Connection to sense of place and existing environment; topography, historic buildings, existing use classes.

Core Policy 58 Ensuring the conservation of the historic environment - Proposed development should protect, conserve and where possible, enhance the historic environment. Designated heritage assets and their settings will be conserved, and where appropriate, enhanced in a manner appropriate, such as historic parks and gardens, and conservation areas

Core Policy 67 Flood Risk – Development proposed in Flood Zones 2 and 3, as identified within the Strategic Flood Risk Assessment, will need to refer to the Strategic Housing Land

Availability Assessment when providing evidence to the local planning authority in order to apply the sequential test in line with the requirements of national policy and established best practice.

Core Policy 68 Water resources - Development will not have an adverse effect on the relevant River Basin or Catchment Management Plan, and should contribute towards their delivery where possible. Details should be submitted on how water efficiency has been taken into account during the design proposal.

8.2.2 Wiltshire Local Plan Review

The Wiltshire Local Plan Review (LPR) 2020-2038 has been subject to the first stage of hearings for examination in June 2025 in relation to the Duty to Cooperate. The second stage of hearings was due to commence on the 11th of November 2025. As such, the policies within the LPR have limited weight at this stage as examination is yet to be concluded.

Policy 88: Biodiversity and geodiversity - requires the mitigation hierarchy to be applied, supports proposals which conserve biodiversity and ecosystems and requires proportionate and appropriate BNG to be secured.

Policy 89 Biodiversity Net Gain – the provision of 20% biodiversity net gain or higher over pre-development biodiversity levels

Policy 91 Conserving and Enhancing Wiltshire's Landscape -- requires the highest level of protection is given to the landscape. Preventing seepage from the proposed site, the character of the area will be allowed to return to the previous conditions, as the water level will be able to rise to higher levels without risk of seepage.

Policy 93 Green and Blue Infrastructure – proposals should consider and, where possible, enhance existing green and blue infrastructure networks, ensuring integration and connectivity throughout the term.

Policy 95 Flood Risk – supports flood resilience schemes that reduce the impact of a flood event..

Policy 98 Ensuring high quality design and place shaping – requires design excellence and development to be resilient to climate change and extreme weather events. The policy also sets out detailed criteria.

Policy 99: Enhancing the conservation and enhancement of the Historic Environment - seeks to conserve and enhance the significance of heritage assets. The policy draws reference to registered Parks and Gardens within which the proposed development site is located.

8.3 8.3 Other relevant legislation and policy

8.3.1 Reservoirs Act 1975

The 1975 Reservoir Act currently states that a statutory reservoir (in England) is any large, raised reservoir with a capacity of >10,000m³. The garden lake is an impounding reservoir with a storage capacity of a 178,00m³.

The act requires appropriate maintenance and oversight of the reservoir by a competent individual, a qualified engineer. This qualified engineer is also regarded to be involved in various associated planning applications. Overall, the Act ensures that large reservoirs are properly designed, safely maintained, regularly inspected and tightly controlled to protect the public from reservoir failure.

8.3.2 Wiltshire Biodiversity Action Plan 2008

The Wiltshire Biodiversity Action Plan (BAP) 2008 was adopted in 2008 and builds into the Wiltshire CS, linking to policies such as Core policy 50.

8.3.3 Local Nature Recovery Strategy for Wiltshire and Swindon

Local Nature Recovery Strategies (LNRS) are a mechanism to deliver nature's recovery at a local and regional scale, as introduced in the Environment Act 2021. The LNRS is still in a draft format with full council sign-off expected in July 2026.

8.3.4 Wiltshire Landscape Character Assessment

Wiltshire Landscape Character Assessment was adopted in December 2008 and links to the Wiltshire CS, such as Core Policy 51.

8.3.5 Cranborne Chase Partnership Plan 2019-2024

The Partnership Plan sets out the ambitions for the Cranborne Chase NL in which the proposed development is located. The following ambition for the NL holds relevance to the proposed development, taken from section 3.2 (pg. 12):

Conserving and enhancing: 1. Outstanding Landscape

- The unique character, tranquillity and special qualities of the NL landscapes are conserved and enhanced.
- The area's special qualities are widely understood.
- Informed decision-making strengthens the special qualities.
- When change happens, it is consistent with the character of the landscape and the setting of the NL.
- Take opportunities to restore landscape features that require it.

9 Planning Policy Review and Material Planning Considerations

Having considered the location of the site and the nature of the proposed scheme the material planning considerations and their compliance with the relevant planning policy are set out below.

9.1 Arboriculture

The works were within close proximity to trees. A Tree Survey and Arboricultural Impact Assessment (AIA) has been carried out, and the AIA indicates that some trees were impacted by the proposal.

A total of 43 trees were surveyed, with the classification as follows:

- 0 trees were found to be unsuitable for retention – Category U
- 5 trees found to be of high quality – Category A
- 19 trees and 1 group were found to be of moderate quality – Category B
- 11 trees and 7 Groups were found to be of low quality – Category C

Of the trees identified, there is no TPO in place, but they are still protected by virtue of their location within the Stourton Conservation Area. A search of the Woodland Trust's Ancient Tree Inventory (ATI) indicates that there are several trees on site or within 250m of the site recorded as Notable, Veteran or Ancient but none are within the RLB (close to the proposed development), and or deemed to be impacted directly by the scheme.

The proposed scheme has resulted in the following impacts on trees:

- Removals of 7 individual trees:
 - Cat C - T012, T013, T015, T016, and Group G001
 - Cat B - T014, T017, T018
- Pruning: Minor works to 2 trees (T019, T033) and 2 groups (G002, G004) to maintain plant access clearance
- Root Protection Area Intrusions: Limited localised impacts to T010, T011, T019 controlled through exclusion of works and works being undertaken on the west side.
- Potential compaction, soil stripping, and mechanical disturbance risks are identified, but all are deemed manageable with standard protective measures.

It has been necessary to undertake some enabling tree works prior to the submission of this application. Tree removal and works have been included in a separate application, PL/2025/09562 - Notification of Proposed Works to Trees in a Conservation Area. The Council has been made aware of retrospective works prior to this application and the proposed works. The council raised no objections to the specified works to be carried out in accordance with application PL/2025/09562.

Mitigation

- Tree Protection: Establish exclusion zones for T010 and T011 using pinned rope barriers with signage; no groundworks or storage within these zones without liaison with an arboriculturist.
- Reinstatement: Topsoil reinstatement following piling and periodic post-construction monitoring.
- Replacement Planting: Compensatory planting recommended using native or locally appropriate species outside RPAs of retained trees.

Significance of Residual Effects

The scheme is assessed to have a low arboricultural impact, and the proposed works did not result in an overall significant adverse impact on retained trees or local landscape character with the provided mitigation measures, including replacement planting.

The retained trees will continue to contribute positively to the site's aesthetic, ecological, and heritage value.

Policy and Legislation

Given the above, it is considered that there is no conflict with the NPPF or policies 51, 52, 57 and 89 of the CS.

9.2 Ecology and Biodiversity

Impact on Local Wildlife Site (LWS)

The proposed site sits within the Garden Lake, Stourhead LWS. Given the nature and small footprint of the proposed works, it was considered that there would not be any significant impact on the designated sites. Whilst there is the risk of potential pollution from construction, the following methods were taken to prevent adverse effects during the onsite works.

Mitigation

To minimise the risk of a pollution event occurring, mitigation measures were implemented throughout the works. A Construction Environmental Management Plan (CEMP) was prepared, which sets out the actions that were implemented to control the construction of the scheme so as to avoid adverse impacts on the environment.

The mitigation as outlined above was implemented; there were no residual effects on the LWS. Given the above, there was no conflict with the NPPF or policies 50, 57 and 89 of the CS.

Biodiversity Net Gain (BNG)

As works on site have been carried out and the application is retrospective, the application is therefore exempt from the mandatory requirement for 10% BNG. However, policy 50 of the CS still sets out that all development should seek opportunities to enhance biodiversity.

To achieve a net gain in biodiversity across the site, the following habitat enhancements have been proposed:

- As part of the proposed works areas of modified grassland will be cleared in order to facilitate the piling works. As part of the reinstatement of these areas grassland enhancement has been proposed. Where possible areas of modified grassland will be enhanced to neutral grassland in poor condition, ideally by enhancing with green hay from nearby species-rich grassland sites. If this is not possible the grassland areas will be sown with a low density of grass. Emorsgate EG8 Meadow Grass Mixture (or similar) should be used at a sowing rate of 5g/m² and supplemented with locally sourced wildflower seeds.
- An area of Rhododendron scrub will also be cleared as part of the proposed works. This habitat will be enhanced to neutral grassland following the construction works through the removal and eradication of Rhododendron followed by the enhancement of the grassland understory as outlined above.

From the above measures, an indicative 28.34% BNG is estimated to be achieved from the proposed development and therefore, it would accord with policy 50 of the CS.

9.3 Protected Species

A site survey was undertaken on the 19th of August to inform a PEA and EclA (JBA 2025). The survey was based upon a UKHab Survey, conducted using the UK Habitat classification (UKHab) system. The method was extended to identify any features suitable for use by legally protected or notable species and locate evidence for their presence or likely absence based on standard techniques. This included completing an assessment of waterbodies.

9.3.1 Birds

Vegetation and habitats around the site were assessed for their suitability to support nesting birds. Special consideration was given to bird species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). Furthermore, any birds seen or heard on site during the survey were recorded as incidental observations.

Assessment of Effects

There is the potential for the site to be used for nesting by raptors, corvids and passerine species; the lake itself also provides nesting opportunities for various species of waterfowl. Clearance of vegetation during the construction phase could damage or destroy bird nests and their young and result in the temporary loss of nesting and foraging habitat. Construction activities such as sheet piling could cause disturbance to nesting birds and waterfowl foraging on the lake.

Mitigation

Vegetation clearance was to be undertaken between January and February to safeguard against disturbing nesting birds. If vegetation clearance was required in the bird nesting season (March-October, inclusive), a nesting bird check would have been undertaken immediately prior to works beginning, and active nests would have been protected until

fledged. Loss of habitats will be temporary during the construction phase, with impacted habitats were reinstated when the works were completed.

Construction activities were restricted to a small section of the western arm of the main lake body, and therefore, disturbance impacts were limited to this area. Given the small-scale area of the works boundary in relation to the large size of the main body of the lake, it was not anticipated that there will be significant disturbance to waterfowl utilising the lake, and foraging birds had the ability to move to other areas of the lake that are not impacted by the construction activities.

Significance of Residual Effects

With the inclusion of the above mitigation, there were no significant residual effects on birds as a result of the proposed works.

Policy and legislation

Given the above, it is considered that there is no conflict with the NPPF (specifically chapter 15) or policy 50 of the CS.

9.3.2 Bats

Structures and trees likely to have been impacted by the proposed scheme were inspected during a Daytime bat Walkover to observe, assess, and record any habitats suitable for bats to roost, commute and forage both on site and in the surrounding area using the methods specified in the Bat Conservation Trust guidelines (Collins, 2023).

Assessment of Effects

A Tree Survey and AIA assessment had been completed, providing a full assessment of trees recorded within the site boundary. Areas of scrub, grassland and the lake itself likely provide good foraging habitat.

Areas of woodland surrounding the site and a number of mature oaks adjacent to the proposed compound area have the potential to support roosting bats. None of these trees was impacted during the construction work, with none of the identified trees being removed or cut back during construction

There were no loss of roosts or impacts on roosting features as a result of the works, and no commuting features were lost as part of the proposed scheme. During the construction phase, there may be have been the temporary loss of potential foraging habitat and the potential to disturb foraging and commuting bats.

Mitigation

Loss of foraging habitats was temporary during the construction phase, with impacted habitats being reinstated when the works were completed.

No working after dark was undertaken during the construction phase, eliminating the need for artificial lighting on the site during this time. Security lighting during construction was not used. If deemed essential, it would have incorporated Passive Infra-Red (PIR) motion sensors to trigger lighting for no more than two minutes. Lights would have been directed

downwards and away from features of value to bats. Any floodlights fitted included a directional cowl to avoid light-spill onto the Lake or surrounding woodland.

Significance of Residual Effects

With the inclusion of the above mitigation, there were no significant residual effects on bats as a result of the proposed works.

9.3.3 Badgers

There was no evidence of badgers during site investigations; further assessment was not considered necessary.

9.3.4 Water Vole

There was no evidence of water voles during site investigations; further assessment was not considered necessary.

9.3.5 Otter

Assessment of Effects

The site provides potential foraging habitat for Otter, and therefore construction activities, including pilling, could have resulted in injury or disturbance to Otter utilising the site.

Mitigation

Works near the Lake were not undertaken at night, and the Lake was not be illuminated by lighting, such as security lights, during works. If they were needed, any floodlights were fitted with a directional cowl to avoid light-spill onto the Lake. Excavations left overnight were either covered, or an escape ramp was installed to prevent the trapping of Otters. If an Otter was encountered on site during the works, all works would cease immediately, and advice would be obtained from an experienced ecologist.

Significance of Residual Effects

With the inclusion of the above mitigation, there were no significant residual effects on otters as a result of the proposed works.

9.3.6 Great Crested Newt

Assessment of Effects

Garden Lake provides potentially suitable breeding habitat for Great Crested Newt and other amphibians. Managed grassland and scrub habitat adjacent to the lake is also potentially suitable for foraging and hibernation. The works and clearance of vegetation during the construction phase had the potential to result in injury or disturbance to great crested newts and other amphibian species utilising the site, potentially leading to the temporary loss of suitable habitat.

Mitigation

A Great Crested Newt Precautionary Working Method Statement has been produced to outline specific mitigation measures to reduce the potential impact to any Great Crested Newts within the site area.

Vegetation clearance was conducted in a sensitive manner to avoid direct harm to Great Crested Newt and other amphibian species. A suitably qualified ECoW was present on site during the vegetation clearance to complete a search for any resting Great Crested Newt. Should Great Crested Newts have been found, they will be left undisturbed and their place of shelter returned to its original condition, where possible. Works in the area will then be halted, and a low-impact licence may be required.

Should any common amphibians be found on site, they will be captured and relocated by the acting ECoW to a suitable habitat that will be unaffected by the works.

Vegetation in working areas will be maintained short for the duration of the project to reduce the likelihood of disturbing amphibians. Small mammal burrows will be destructively searched under the supervision of an Ecologist to search for any amphibians using these as a refuge and move them away from working areas.

Significance of Residual Effects

With the inclusion of the above mitigation, there were no significant residual effects on great crested newts as a result of the proposed works.

9.3.7 Reptiles

Assessment of Effects

Areas of grassland and managed scrub within the proposed scheme have the potential to support several species of reptiles. Clearance of vegetation during the construction phase could result in injury or disturbance to reptile species utilising the site, and result in the temporary loss of suitable reptile habitat.

Mitigation

Loss of reptile habitat was small in scale and temporary during the construction phase, with impacted habitats being reinstated when the works were completed.

Vegetation clearance was conducted in a sensitive manner to avoid direct harm to reptiles. A suitably qualified ECoW was present on site during the vegetation clearance to complete a search for any hibernating reptiles. Should any reptiles have been found on site, the acting ECoW was to capture and relocate the reptile to a suitable habitat that will be unaffected by the works. Vegetation in working areas were maintained short for the duration of the project to reduce the likelihood of disturbing reptiles. Small mammal burrows were destructively searched under the supervision of an Ecologist to search for any reptiles using these as a refuge and move them away from working areas.

Significance of Residual Effects

With the inclusion of the above mitigation, there were no significant residual effects on reptiles as a result of the proposed works.

9.3.8 Fish

Assessment of Effects

Garden Lake has the potential to support freshwater fish species, and therefore, works during the construction phase could have had the potential to result in injury or disturbance to fish.

Mitigation

In the absence of survey data, it was recommended that it was assumed fish are present in Garden Lake, and appropriate mitigation measures should be undertaken during construction.

Water levels of the shallow western arm off the main lake body were dropped by approximately 1-2 metres to allow access to the western arm embankment. This was achieved through the main drainage network and spillway. The water levels were dropped slowly over the duration of approximately one week, giving any fish present ample time to move to other areas of the lake that are not impacted by the construction activities.

Given the small-scale nature of the works in relation to the size of the main lake body, the proposed water level drop of the western arm did not impact the main lake body. Water levels of the Lake regularly fluctuate, with the National Trust often engaging the drainage network to reduce water levels of the main lake body, and therefore it was not anticipated that the drop in water level of the western arm will impact fish utilising the main lake.

Significance of Residual Effects

With the inclusion of the above mitigation, there were no significant residual effects on fish as a result of the proposed works.

9.3.9 Invasive Non-Native Species

Assessment of Effects

Garden Lake has the potential for INNS Crayfish, the Narrow-clawed Crayfish and therefore works during the construction phase could have the potential to spread the invasive or disease carried by the Crayfish.

Mitigation

Measures were put in place to ensure that there was no spread of INNS or diseases. The CEMP sets out the actions that were implemented to control the construction of the proposed works so as to avoid adverse impacts on the environment.

Significance of Residual Effects

With the inclusion of the above mitigation, there will be no significant residual effects regarding INNS as a result of the proposed works.

9.4 Landscape and Visual

Impacts

The proposals resulted in the removal of trees, areas of cherry laurel scrub, and modified grassland to facilitate engineering works. Construction activity caused temporary disturbance to the southern embankment of Garden Lake, the adjacent footpath, and the surrounding grassland, leading to a temporary reduction in vegetation cover and localised effects on reduced screened and framed views toward the lake and island.

Mitigation

Following completion of the works, reinstatement planting will replace removed vegetation and restore the landscape framework in keeping with the character of the Grade I listed Stourhead Registered Park and Garden. Cherry laurel scrub will be replanted at the request of the National Trust. Cleared grassland will be reinstated using an appropriate meadow seed mix, supported by a programme of aftercare and long-term management to ensure successful establishment.

Significance of Residual Effects

With mitigation in place and planting established, residual landscape and visual effects will be low and localised. Screening and framed views will be restored, and the long-term effects are assessed as neutral to beneficial, reflecting habitat enhancement and the delivery of a 28.34% BNG.

Policy and Legislation

Given the above, it is considered that there is no conflict with the NPPF or policy 51 of the CS.

9.5 Water quality and flood risk

Water quality

A proportionate review as part of the Water Framework Directive (WFD) screening process of the design proposal at Garden Lake has been undertaken. The proposed works did not have a significant negative impact on the WFD components of the Stour (Headwaters) Water Body and the Upper Hampshire Avon Groundwater Water Body, as the mitigation measures outlined in the PEA and EclA (outlined earlier in this report) were implemented. The proposal did not involve work within the Garden Lake (apart from the reduction in water levels) and took place on existing bank modifications, including an embankment. Furthermore, the footprints of the works are small relative to the water body scale. As such, the screening assessment concluded that no further WFD Assessment was required.

Flood risk

Parts of the site are located in Flood Zone 3. Annex 3 (flood risk vulnerability classification) of the NPPF classifies the proposed development as 'Water Compatible'. In accordance with the Flood Risk Vulnerability and Flood Zone Compatibility table in the PPG, development of this type is appropriate in Flood Zone 3 and does not require the application of the Exception Test. In regard to the Sequential Test, the scheme has a particular

requirement to be carried out in this location due to its very nature. Therefore, there are no alternative sites at less risk of flooding.

The site is at low risk from surface water, sewers, and, as a result of reservoir failure. The dominant source of flood risk at the site is via fluvial sources, which presents a medium likelihood. The site is additionally at high risk of groundwater emergence; however, the works were compatible with groundwater conditions and did not adversely affected by groundwater flooding.

A Flood Risk Assessment(FRA) was undertaken and submitted with this application and demonstrates that the works were conducted in a sustainable and safe manner, as maintenance of the existing structure with no changes to its form or function. Therefore, there is no impact of the proposed works on flood risk either at the site or to any third-party land in line with NPPF requirements.

Policy and Legislation

Given the above, it is considered that there is no conflict with the NPPF (specifically Chapter 14) or policies 67 and 68 of the CS.

9.6 Heritage and Archaeology

A Heritage Impact Assessment (HIA) was carried out and submitted with this application. The HIA was supported by a site visit and an initial desktop study. Historic assets were identified and evaluated alongside the proposed works to assess the impacts and appropriate mitigation

The works will have a direct, physical and permanent impact on the Grade I Registered Park and Garden of Stourhead (1000471) and the Stourton Conservation Area (12090) due to the installation of the sheet-pile cut-off wall. As these works were below ground and reinstated following completion, the result is a negligible effect after completion of construction, and vegetation has regrown.

In the longer term, the project will prevent further physical damage to the park from seepage through the lake embankment, thereby enhancing its significance by protecting its artistic, architectural and historic values.

Mitigation

During the construction period, there was limited, temporary, minor negative impacts on the settings of heritage assets within proximity to the works, including the Grade I Listed Pantheon (1131102) and the Grade II Listed Iron Bridge (1131103). These structures incorporate views of Garden Lake, which forms a key element of their historical, architectural and artistic interest within the designed landscape. The area was returned to its present appearance following completion of works and reinstatement.

A vibration-monitoring methodology was implemented during the piling.

Aside from the pre-application consultation with Wiltshire Council and Historic England, Grade II Listed Iron Bridge (1131103) continued to be identified during the pre-construction and construction phases as a designated heritage asset that must be protected from all

construction-related activity, including material storage, vehicle movement and plant access. Buffers were maintained to prevent accidental damage.

Significance of Residual Effects

With the inclusion of the above mitigation, there were no significant residual effects on cultural heritage as a result of the proposed works.

Policy and Legislation

Given the above, it is considered that there is no conflict with the NPPF or policies 57 and 58 of the CS.

10 Construction

Section 10 should be read in conjunction with the submitted CEMP and building statement that accompany this submission. Specific details are contained in these documents. A summary is below to avoid repetition.

10.1 Timescale

The construction period was estimated to be an initial 9 weeks followed by 3 months of rectification period by the contractor.

10.2 Methodology

The works were completed in a single construction phase, including site setup, construction, reinstatement and demobilisation. Once complete, the scheme will operate passively with no routine operational requirements. Ongoing oversight will be through statutory reservoir inspections and post-event inspections following extreme weather or overtopping.

10.2.1 Sequence of works

The following outlines the general envisaged activities to be undertaken in the construction phase of the proposed development, though some of these activities may have occurred in a slightly different order:

Site establishment

- Setting up site compound.
- Erect temporary fencing to working area.
- Removal and retention of Iron Railings in site compound.
- Removal of marked up trees and vegetation – material arising from clearance to be dealt with according to the PXG-JBA-00-GL-SP-Z-5001-Garden_Lake_Works_Specification.
- Setting up track matting to gain machine access to work areas.
- Delivery of site materials (i.e. sheet piles) & plant.

Sheet Piling

- Topsoil strip & transport to stockpile.
- Concrete path breakout and recycled.
- Construction of working platform using imported stone and geotextile.
- Transportation of sheet piles to the working area.
- Installation of sheet piles using a 14-tonne excavator mounted Movax.
- Inspection and survey of sheet piling.
- Placement & compaction of Type 1A fill and Type 1A1 fill in location of former concrete path.
- Reinstatement of Topsoil over sheet piles.

- Grass seeding.
- Removal of working platform and disposal off site, with removal of existing Geosynthetic Clay Liner (GCL) and associated stone. GCL to be recycled, associated stone to be stockpiled for re-use by the National Trust.

Earthworks Remediation

- Topsoil strip & transport to stockpile.
- Excavation of sinkhole to either base of sinkhole or level of gravel path – to be determined on site. Using an 8-tonne excavator.
- Benched and backfilled
- Topsoil placement
- Grass seeding.

Demobilisation

- Survey of entire site.
- Removal of any temporary works (i.e., working platform)
- Inspection and remediation of wave wall if required.
- Reinstatement of Iron Railings.
- Collection of plant and materials
- Removal of temporary fencing
- Removal of site compound

This should be read in conjunction with the CEMP, engineering drawings and Buildability Statement.

10.3 Impacts

Construction impacts were temporary and managed through controlled access, protection measures, and reinstatement. The completed works have had minimal visual or operational impact, with buried sheet piles requiring no routine maintenance. Long-term impacts are limited to periodic inspection and occasional unplanned maintenance following extreme events. As such, it is not considered that the construction impacts will be short-term with the site restored. As such, it is not considered that there would be a detrimental impact on ecology and biodiversity, the historic environment and the appearance of the area.

11 Conclusions

Given the above, the works would deliver substantial public benefits by addressing overtopping and seepage risk at the dam that comply with the MIOS requirements under the Reservoirs Act. At the same time, they would not conflict with the relevant policies of the Development Plan and national planning policy and guidance.

In particular, the works would not have a detrimental impact on any species, would not have any harmful impact on any heritage assets, the landscape and appearance of the area and would not lead to any increase in flood risk. There is a percentage gain of biodiversity from this proposal, as vegetation is being reinstated with new planting (grass seeding and cherry laurel) and INNIS removal (rhododendron).

In the longer term, the project will prevent further physical damage to the park from seepage through the lake embankment, thereby enhancing its significance by protecting its artistic, architectural and historic values.

The works on site have been completed retrospectively to this full planning submission. This has been done due to the emergency of the sinkhole's appearance, prompting immediate action on site and undertaking MIOS work.

It is therefore respectfully requested that planning permission be granted

12 References

- Chris Blandford Associates, 2006, West Wiltshire District Landscape Character Assessment (West Wiltshire District Council),
https://www.wiltshire.gov.uk/media/9710/West-Wiltshire-Landscape-Character-Assessment/pdf/11102101_Draft_Final_LCA_12-06.pdf?m=637962467303870000
 (accessed on 20/01/2026)
- Collins, J. (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines. 3rd edition. Bat Conservation Trust, London.
- Cranborne Chase AONB Partnership, 2020, Cranborne Chase AONB Partnership 2019-2020 (Cranborne Chase AONB Partnership), <https://cranbornechase.org.uk/wp-content/uploads/2020/04/CCAONB-Management-Plan-2019-2024-for-WEB.pdf> (accessed on 20/01/2026)
- Department for Environment, Food & Rural Affairs, 2025, The Statutory Biodiversity Metric User Guide (Department for Environment, Food & Rural Affairs),
https://assets.publishing.service.gov.uk/media/689c5ee17b2e384441636196/The_Statutory_Biodiversity_Metric_-_User_Guide_-_July_2025.pdf (accessed on 20/01/2026)
- Environment Act 2021, 2021 (The Stationery Office),
https://www.legislation.gov.uk/ukpga/2021/30/pdfs/ukpga_20210030_en.pdf (20/01/2026)
- Ministry of Housing, Communities and Local Government, 2024, National Planning Policy Framework (Ministry of Housing, Communities and Local Government),
https://assets.publishing.service.gov.uk/media/67aaf8f3b41f783cca46251/NPPF_December_2024.pdf (accessed on 20/01/2026)
- Reservoir Act 1974, 2022 (The Stationery Office),
https://www.legislation.gov.uk/ukpga/1975/23/pdfs/ukpga_19750023_en.pdf (accessed on 20/01/2026)
- Swindon Council, and Wiltshire Council, 2025, Local Nature Recovery Strategy for Wiltshire and Swindon, https://www.wiltshire.gov.uk/media/18289/Local-Nature-Recovery-Strategy-for-Wiltshire-and-Swindon/pdf/Revised_Copy_of_Local_Nature_Recovery_Strategy_for_Wiltshire_and_Swindon_landscape-compressed_1.pdf?m=1762355778637 (accessed on 20/01/2026)
- Town and Country Planning Act 1990, 2023 (The Stationary office),
https://www.legislation.gov.uk/ukpga/1990/8/pdfs/ukpga_19900008_en.pdf (accessed on 20/01/2026)
- Wilkinson, S., 2008, Wiltshire Biodiversity Action Plan (Wiltshire Wildlife Trust),
<https://www.wiltshirewildlife.org/sites/default/files/2022-08/wiltshirebap2008%281%29.pdf>
 (accessed on 20/01/2026)

Wiltshire Council, 2015, Wiltshire Core Strategy,(Wiltshire Council),
https://www.wiltshire.gov.uk/media/372/Wiltshire-Core-Strategy-adopted-2015/pdf/Wiltshire_Core_Strategy_2015.pdf?m=1735555642237 (accessed on 20/01/2026)

Wiltshire Council, 2023, Wiltshire Local Plan Pre-Submission Draft 2020-2038 (Regulation 19)(Wiltshire Council), https://www.wiltshire.gov.uk/media/11976/Wiltshire-Local-Plan-Pre-Submission-Draft-2020-2038-Regulation-19/pdf/Wiltshire_Local_Plan_Reg_19_web_accessible_version.pdf?m=1695730562743 (accessed on 20/01/2026)

Our Offices

Bristol
Coleshill
Cork
Doncaster
Dublin
Edinburgh
Exeter
Glasgow
Haywards Heath
Leeds
Limerick

Newcastle
Newport
Peterborough
Portsmouth
Saltaire
Skipton
Tadcaster
Thirsk
Wallingford
Warrington



Registered Office

1 Broughton Park
Old Lane North
Broughton
SKIPTON
North Yorkshire
BD23 3FD
United Kingdom

+44(0) 1756 799919
info@jbaconsulting.com
www.jbaconsulting.com

Follow us on  

Jeremy Benn
Associates Limited
Registered in
England
3246693

JBA Group Ltd is
certified to
ISO 9001:2015
ISO 14001:2015
ISO 27001:2022
ISO 45001:2018

