



Planning Statement including the Design and
Access Statement and Heritage Impact
Assessment for a suite of Air-Source Heat Pump
Installations at Stourhead.

Stourhead, Stourton, Warminster, Wiltshire, BA12 6QD



Full Planning Application & Listed Building Consent

Appendices

Appendix A: RIBA Stage 3 Design

Appendix B: Tree Impact Assessment

Appendix C: Preliminary Ecological Appraisal

Appendix D: Archaeological Assessment

Appendix E: Noise Impact Assessment

Appendix F: Stourhead's Spirit of Place

Appendix G: Stourhead's Statement of Significance

1 Introduction

- 1.1** Site: Stourhead, Stourton, Warminster, Wiltshire, BA12 6QD
Buildings in Scope: Estate Office (Ponticum House), 86 Church Lawn, 89 Church Lawn, Visitor Reception and Restaurant/Shop.
- 1.2** This Planning Statement is to be read in conjunction with the forms and plans submitted as part of the applications for full Planning Permission and Listed Building Consent for the installation of environmentally sustainable heating systems at Stourhead's operational buildings. This document is to consider the implications of providing such installations on the site and will demonstrate an understanding of the significance of the estate and its buildings. The property and gardens are owned and managed by the National Trust (NT) and are open to the public as a visitor attraction.
- 1.3** The proposed work will involve the removal of existing coal, oil and LPG boiler plant & tanks and installation of new Air-Source Heat Pump (ASHP) systems at five buildings.
- 1.4** This document will be split into sections that consider relevant planning matters in respect of this proposal and will refer to evidence included as appendices.
- 1.5** The overarching aim of this project is linked with the NT's ambition to become Net Zero by 2030 and remove the risks that fossil fuels pose to the local & wider environment.

2 Site History, Description and Context

- 2.1** Stourhead, located in Wiltshire, South-West England, came into the National Trust's ownership in 1946. It is open as a visitor attraction 364 days a year where visitors can enjoy the house, restaurant, shop, and the world-famous landscape garden.
- 2.2** Stourhead House is a Grade I listed building (List Entry 1131104: 1966) and stands as one of the earliest examples of Palladian architecture in England. Constructed between 1721 and 1725, it was built by Master Builder Nathaniel Ireson and designed by Architect Colen Campbell. In 1902 much of the house was destroyed by a fire, but many of the collection items were saved and the house was restored to its original design. Since 2016, the house has operated with a self-supply chip biomass system; one of the pioneering installations under the NT's Renewable Energy Programme. Building on the success of this project and the NT's ongoing commitment to decarbonisation, a follow-on project is now underway. This second phase aims to address the remaining operational buildings across the Stourhead estate heated by fossil fuels. Also delivered by the NT's Renewable Energy Programme, the project will incorporate lessons learned and industry advancements from the past decade to further reduce Scope 1 carbon emissions at Stourhead.
- 2.3** The Estate Office (Ponticum House) is a Grade II (List Entry 1198911: 1987) mid-16th Century building with substantial changes and extensions in the late 18th Century and early 19th Century. The property has been used as the National Trust's Estate Office since 1946 but has historically been the estate agent's house and was occupied by the Hoare family during the main house renovations.

Up until 2024 it was heated by an oil boiler which has since been deemed uncompliant due to reaching the end of its serviceable life. As a temporary fix, it is currently heated by LPG cylinders which is not an appropriate long-term solution as it is costly and requires regular replacement deliveries. The redundant oil tank, located in the wash house to the rear of the building, is still in situ.

- 2.4** 89 Church Lawn, one of a row of cottages on the High Street, is a Grade II listed (List Entry 111004: 1985) late 18th Century building made with local stone and still boasts original features such as period fireplaces. It is located at the entrance to the renowned landscape garden and is currently used as a Holiday Cottage, managed by the NT to enable visitors from further afield to enjoy the exceptional heritage and beauty of Stourhead. It is currently heated by an oil boiler with the tank located in the rear garden.
- 2.5** 86 Church Lawn is a mirror image of No. 89, located at the opposite end of the row. It is also Grade II listed (List Entry 1318449: 1987). Historically, the property served as the post office and continues to accommodate the village's working post box. Until June 2026, it was occupied by a tenant who lived on site for 60 years and worked for the Hoare family, who has now been relocated closer to family. It is currently heated by a coal Raeburn & coal back burner.
- 2.6** The Visitor Welcome complex (Visitor Reception, Toilets, Restaurant, Shop) was built in 1993 to offer a more structured welcoming entry point close to an accessible car park and away from the historic buildings. They provide a streamlined service for ticketing and information, deliver a variety of food and beverage options, provide immediate welfare provisions upon arrival, and support the year-round tourism model of the site. These are currently heated by a mixture of oil and LPG systems which are coming to the end of their serviceable life and experience regular breakdowns.
- 2.7** Stourhead's gardens are Grade I listed (List Entry: 1000471: 1987) on the Register of Historic Parks and Gardens, which includes the lake, formal gardens and wider woodland as they are one of the finest examples of an 18th Century designed landscape. The Estate Office, 86 & 89 Church Lawn sit within this designation.
- 2.8** All five buildings sit within both the Stourton Conservation Area, and the Cranbourne Chase National Landscape. Together, these are established to protect the architectural, geological and ecological qualities of these areas. The latter is also designated as an International Dark Sky Reserve.
- 2.9** The buildings in scope and how they sit in the wider context of the site are demonstrated in Figure 1, outlined in blue. The Main House, supported by the biomass, is outlined in red and continues to save 90 tonnes of carbon per year compared to the previous oil system.

3 The Need

- 3.1** Stourhead is a property which is included within the NT's Renewable Energy Programme. The purpose of the programme is for the organisation to become Net Zero by 2030, focusing on reducing Scope 1 emissions. This involves converting fossil-fuel heating systems onto low-carbon, cleaner alternatives.

- To safeguard the natural environment by preventing damage to, or mitigating risks, to Stourhead's unique ecology and landscape

4 Options Appraisal and Proposal

- 4.1** A full heat loss assessment and feasibility study was completed for Stourhead considering several options. A summary of the options and reasons for discounting/pursuing are below:
- 4.2 Option 1: Do Nothing/Replace with fossil fuel boilers** – Due to improved compliance regulations it would be challenging to replace these systems like-for-like without interventions to the tanks and listed building structures. This explains why the Estate Office is currently on a temporary system. This would be the cheapest option but would not provide any carbon savings and the risk of a fuel leak would remain which has the potential to damage building fabric and harm local species. This option is therefore incongruous with the NT's climate action strategy and was discounted.
- 4.3 Option 2: Air-Source Heat Pump (ASHP)** – ASHPs are quick and easy to install and require minimal groundworks. ASHP installations should be complimented with radiator upgrades to be compatible with the lower flow temperatures (45-60 °C). These systems are efficient (250-460%) which help with running costs and lowering carbon emissions. The units would have to be installed externally, meaning that there would be a visual and acoustic impact to any installation. Each building in question has a rear garden or service area hidden from the visitor route and neighbouring buildings which provides neat solutions for any external plant. Each building can be addressed separately to use the units available on the domestic market which are very quiet and run on R290 refrigerant which also has the ability to produce hot water. Therefore, this option was brought forward for consideration.
- 4.4 Option 3: Ground-Source Heat Pump (GSHP)** – GSHPs provide medium flow temperatures (50-60 °C) and are recognised for their high efficiency (300-400%) resulting in low carbon emissions and running costs. However, they are associated with high capital cost and require a suitable area of land to locate a ground-array, either using horizontal pipework or vertical boreholes, with the former requiring significantly more space. Similar to ASHPs, GSHPs necessitate radiator upgrades to accommodate lower flow temperatures. A notable advantage is that GSHP equipment is installed internally, and once reinstated, the installation is invisible. Despite these benefits, the dispersed layout of the buildings under consideration presents a major challenge; connecting multiple structures to a centralised heat array would require an extensive network of underground pipework, significant installation costs and concerns related to archaeology, ecology, and tree roots. Furthermore, to meet peak heating demands and provide domestic hot water, supplementary systems such as electric or LPG boilers would be required. These solutions either incur high running costs or perpetuate the use of fossil fuels, which is counter to decarbonisation objectives. Therefore, this option was discounted.
- 4.5 Option 4: Biomass** – This option is at the medium cost point but would provide the highest carbon savings. Stourhead house currently operates a biomass chip

system which is supplied by estate-managed timber matched to existing demand. Extending this system to the ancillary buildings is not viable as it would necessitate long underground heat mains resulting in significant heat losses and the requirement for larger boilers. Scaling up the current system would also exceed the capacity for self-supply timber, requiring additional deliveries. New, separate biomasses are also not recommended for the operational buildings due to their dispersed nature, lack of space, and the additional strain on the facilities team. Therefore, site logistics render this option impractical.

4.6 It was on this basis that the NT made the decision for its preferred option 2: ASHPs. This option provides the best balance of construction and maintenance logistics, least impact upon the wider Stourhead estate, neighbours and visitors, and provides an appropriate balance of capital costs, operational costs and carbon savings. Exact units will be determined by the chosen contractors and approved by the NT and our Client Engineer and are therefore subject to change, but our current proposals are below as they support the varying demands of each building, are well suited to each environment and are tried and tested at numerous other NT sites (Figure 2). The footprint & noise assessment remain the same, regardless of unit chosen as the worst-case scenario has been modelled; any alternative unit would be similar in size, noise and output:

- Estate Office: 2 x 12 kW Vaillant Arotherm Plus (same set-up as Fig. 2)
- 89 Church Lawn: 1 x 10kW Vaillant Arotherm Plus (same double fan unit as in Fig.2)
- 86 Church Lawn: 1 x 10kW Vaillant Arotherm Plus
- Visitor Reception: 1 x 12 kW Vaillant Arotherm Plus
- Restaurant/Shop: Exact units TBC, but likely 3 x 24kW Volta A-O-A or 3 x 19kW Vaillant Perform.



Figure 2: 2 x Vaillant Arotherm Plus, at Box Hill, Surrey (Left), Example Volta 24kW Unit (Right).

- 4.7** It is proposed to re-use the existing plant rooms/cupboards to accommodate all internal plant and rear gardens for external plant, with some small adjustments. Some buildings will require radiator and pipework upgrades to be compatible with lower temperatures to maximise efficiency and comfort. All current radiators are modern panel style and likely date from the 1970s-2000s (e.g. K1 & K2) and are starting to show signs of failure. These will be replaced with same-style, larger alternatives (e.g. K2 & K3) in the same locations. (See Figure 4 for examples). RIBA 3 Design can be found in Appendix A.



Figure 3: Examples of current radiators (Left), compared to examples of proposed radiators (right)

- 4.8** This application covers LBC alternations for all listed buildings apart from 86 Church Lawn. Whilst this application seeks permission for the ASHP unit at 86 Church Lawn, this building requires a lot of additional works, such as building fabric improvements, electrical upgrades, energy efficiency measures and decoration works. Therefore, all internal adjustments associated with the ASHP installation (e.g. radiator installations, cylinder installs, etc) and visual barriers in the form of a new gate, will be submitted under a separate LBC application

alongside these other works as a complete package. It was decided that permission for the external ASHP unit alone would sit more appropriately with this application.

- 4.9** Some electrical improvements are required; either to increase incoming capacity or to upgrade from single to three phase. These works are minimal and focus largely on the upgrade of a sub-station in the car park and some reinforcement cabling & trenching to the Visitor Reception and Estate Office. All these works, including the groundworks, will be completed by Scottish and Southern Electricity Networks (SSEN) who hold statutory powers to install or replace underground cables & substations under the Town and Country Planning Order 2025 (Class B, Part 15). Through their own consenting process, they have been working with NT experts in trees, ecology and archaeology, to ensure they comply with environmental and archaeological regulations, of which nothing of concern has been highlighted. 86 & 89 Church Lawn have sufficient existing capacity in the form of 100Amp fuse.
- 4.10** Two lapsed ASHP planning/LBC applications for the Estate Office (18/10071/FUL) and Visitor Reception/Restaurant (18/09490/FUL) were granted permission in November 2018, which this application has improved upon using the latest technology and considerations.
- 4.11** A closely aligned initiative to this application is the Solar Photo Voltaic (PV) project known as 'StourPower'. This sister scheme is being delivered by the same Renewable Energy Programme Team within the NT and shares several key elements, including survey data, design considerations, and stakeholder engagement. All proposed ASHPs will be connected to a common substation located in the car park, which will also serve the Solar PV array. This integrated approach will enable Stourhead to optimise the use of on-site solar generation, thereby offsetting the increased electrical demand resulting from the transition to electric heating. To support this dual connection, the existing Pole-Mounted Transformer (PMT) will be upgraded to a Ground-Mounted Substation by SSEN, increasing electrical capacity to 500 kVA and ensuring sufficient infrastructure for both renewable energy generation and distribution.
- 4.12** A project open-day was held on 16th September 2025 at Stourhead to present these projects to statutory consultees and a statutory public consultation was undertaken in January 2026 for the Solar PV project, which was supported by the ASHP proposal due to their interdependencies and shared ambitions. The messaging around connecting these two projects provides a fantastic opportunity to contribute towards Stourhead's Green Ambitions and improve staff and visitor's carbon literacy and understanding of climate change mitigation and adaption. The Solar PV project is subject to a separate planning application (PL/2026/03394).

5 Planning Policy

- 5.1** Section 38 (6) of the Planning and Compulsory Purchase Act 2004, states that regard is to be had to the Development Plan for the purpose of any determination to be made under the Planning Acts, and that determination must be made in accordance with the Plan, unless material considerations indicate otherwise.

- 5.2** The proposal has been assessed against the adopted Development Plan for Wiltshire, comprising the Wiltshire Core Strategy (2015) and the National Planning Policy Framework (NPPF, 2026).

National Planning Policy Framework, 2026

- 5.2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a material consideration of '*critical importance*' in the determination of planning applications.
- i. The NT has carefully considered the policies contained within both the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) in developing the proposal at Stourhead. The NT considers that this proposal meets many of the Core Planning Principles laid out within the NPPF relating to supporting a transition to a low carbon future in a changing climate and conserving heritage assets in a manner appropriate to their significance.
 - ii. The NPPF has put sustainable development at the core of all economic, social and environmental policies and highlights the importance of supporting the delivery of renewable and low carbon energy and associated infrastructure at the centre of achieving this. New policy S3.1. sets out that decisions on development proposals should apply a presumption in favour of sustainable development. S3.1.c states that in all locations, development proposals that accord with both an up-to-date development plan and the decision-making policies in the NPPF should be approved '*without delay*'.
 - iii. The NPPF clearly states in Para 2 of Policy CC2, which relates to the mitigation of climate change, states: "*Substantial weight should be given to the benefits of improving the energy efficiency of existing buildings and/or drawing energy from district heat networks, renewable and low carbon sources (including through the installation of heat pumps and solar panels where these do not already benefit from permitted development rights) where this would be achieved through proposals for development*".
 - iv. For development outside of settlements, decisions are to accord with S5 where only certain forms of development should be approved as set out within a defined list. For this application S5.1.b supports '*Development for rural businesses and services, including tourism, where a location outside settlements is shown to be necessary*'. Policy E4 Rural Business Development takes this a step further by confirming that the sustainable growth of businesses in rural areas should be supported.
 - v. In considering the wider objectives of the NPPF, including Chapter 14 (Achieving well-designed Places), Chapter 19 (Conserving and enhancing the natural environment) and Chapter 20 (Conserving and enhancing the historic environment), this proposal has been assessed against the key aims in these chapters supporting the principles of good design, sustainable development, and sensitive intervention within protected settings. These include the delivery of a reliable and sustainable heating solution, the use of discreet and low-impact equipment, minimal intervention in the surrounding landscape, and the

long-term conservation of historic buildings through improved environmental control and protection of the building fabric.

- vi. The NT has considered it important to provide information on the benefits that would arise from the installation ASHP systems at Stourhead and how these are part of a wider strategy within the NT to reduce the environmental impact that the organisation has. Given the careful consideration of all the relevant planning considerations during the feasibility and design stages of the project it is considered by the NT that the impact of installing this system is acceptable and fully complies with the requirements in the NPPF.

5.3 Local Planning Policy: Wiltshire Local Plan 2015

- 5.3.1 The Plan was adopted by Wiltshire Council in 2015 and it forms the statutory development plan for the council. A scoping consultation on a new local plan took place in September 2026, but this is yet to be published. The NT has carefully considered policies contained within the 2015 Local Plan in developing proposals for the site.
- 5.3.2 Core Policy 51 seeks to protect, conserve and where possible enhance landscape character. The special qualities of National Landscape will be protected, where great weight will be afforded to conserving and enhancing landscapes and scenic beauty. The proposed development is located within existing service areas or in private back gardens, so while there will be some minor impacts during construction, the site shall be restored to its current status, so there will be no long-term impacts on the National Landscape. The proposal will have no impact upon the character or beauty of the countryside due to its small scale and Stourhead will remain an enjoyable and tranquil visitor attraction. The proposal is also supported by the drive towards Net Zero and the need to support sustainable growth of the rural economy.
- 5.3.3 Core Policy 57 seeks to ensure high quality design and place shaping. The policy refers to proposals being sympathetic to historic buildings and landscapes, maximising opportunities for renewable energy sources and having regard to the impact on amenities, of which this project has considered throughout the design.
- 5.3.4 Core Policy 39 supports Tourist development where if outside the Principal Settlements and Market towns. The development supports the operation and effectiveness of Stourhead and provides a sustainable energy system in support of the tourist attraction and so promotes sustainable tourism.
- 5.3.5 Relating to Core Policy 58 states development should protect, conserve and where possible enhance the historic environment. The proposal requires some minor changes to the listed structure. However, these are restricted to areas with previous disturbance, re-using existing structures, and ultimately

removable/reversible to facilitate any future heating system developments within the buildings. The development enhances the attractiveness and visitor experience by providing a renewable energy source and improving the sustainability of Stourhead.

- 5.3.6 Core Policy 58 also refers to Historic Parks and Gardens. There will be minimal impact upon the registered park and garden during construction (e.g. construction traffic, heras fencing) as all works are confined to existing service areas or hidden areas. The overall aesthetic, function and enjoyment of the park and garden will remain unchanged as part of these works.
- 5.3.7 The NT has provided full information regarding the significance of Stourhead, surrounding buildings and landscape and demonstrated a clear understanding of their settings. In addition, information has been provided on the historical significance of the site and measures have been taken to avoid the most important areas and mitigation provided where no alternative to some disturbance is possible. It is considered that there is very minimal harm that will occur to the area and the setting of the listed buildings during construction, however this will be temporary and will clearly be balanced out by the public benefits arising from moving to renewable energy and the education opportunities this will bring.
- 5.3.8 Core Policy 51 looks to conserve natural features such as trees, hedgerows, woodland, field boundaries, watercourses and waterbodies. The development has been designed with this in mind, with any intervention with these designed out of scope. The Trust therefore considers that the relevant requirements within this policy are met.
- 5.3.9 Core Policy 41: Sustainable construction and low carbon energy sets out that proposals to reduce energy demand will be encouraged but proposals relating to historic buildings, listed buildings and buildings within conservation areas and world heritage sites should ensure the appropriate sensitive approaches and materials are used. The proposed development meets the requirements of Policy 41 as the infrastructure will be installed within existing service areas and the existing use of each room and space fully restored upon completion. There will be no long-term changes or impacts on the landscape or heritage assets. The heat pumps are fully MCS (Micro-generation Certification Scheme) compliant when considering noise pollution.
- 5.3.10 Consequently, the Trust believes that this development has been thoroughly considered, and the policies outlined above complied with.

5.4 Historic England Guidance

- 5.4.1 In the design of the proposed development the Trust has had regard to Historic England (HE) guidance, including that relating to its conservation principles and guidance on settings. Regard has also been had to the Historic England position on renewable energy, which states:

“Recognising the threats of climate change to the historic and natural environments and to our national prosperity, Historic England welcomes the Government’s commitment to reduce the emissions which contribute to global warming.

We support measures to reduce fossil fuel consumption, increase energy efficiency and exploit renewable energy sources. In addition, through our own sustainable development strategy, we are committed to reducing the environmental impact of our own activities.

Nevertheless, we also recognise that some renewable energy technologies have the potential to cause serious damage to irreplaceable historic sites, which are themselves an integral part of the wider environmental and sustainability agenda”.

- 5.4.2 In summary Historic England supports an approach to renewable energy generation which:

- Acknowledges the need for society to invest in a wide range of renewable energy generation technologies;
- Recognises the potential environmental impacts of different technologies, including their implications for the historic environment;
- Keeps the balance of environmental benefits and disadvantages of each technology under continual review;
- Continually seeks to limit and mitigate adverse impacts.

- 5.4.3 Historic England believes in maximising the benefits of renewable energy projects, while minimising their adverse effects on the historic environment. HE’s advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency provides an extensive guide on how to achieve a greener future by adapting and mitigating to climate change whilst keeping historic buildings in use through sensitive installations, repairs and maintenance. This can be achieved by considering the cumulative effects of projects as well as their specific impacts and by ensuring that the implications of renewable energy developments are adequately reflected in national, regional and local planning policy and at all stages of the environmental impact assessment process.

- 5.4.4 Consequently HE supports projects like that proposed for Stourhead provided that the implementation of the project does not give rise to harm to the heritage assets here. This statement demonstrates that the project would not result in

adverse visual impacts, would safeguard the setting of listed buildings and would not harm the spirit of place; therefore, the proposals are in compliance with HE guidance.

6 Considerations

6.1 Heritage & Listed Buildings

- 6.1.1 Stourhead's Spirit of Place (Appendix B) and Statement of Significance (Appendix C) demonstrate the history and importance of Stourhead and its collections and has assisted in governing the design considerations of this project. Special consideration has been given to the Listed Buildings on site and the works proposed within their curtilage.
- 6.1.2 The proposed systems will be efficient and sophisticated, able to adapt to the heating and hot water needs of the buildings through programmers and thermostats. This is important to ensure suitable conditions to protect the fabric of the listed buildings and catering to the needs of staff, visitors and holiday guests. The existing thermostats are well placed in the buildings and will be replaced with new programmers.
- 6.1.3 The existing plant rooms/utility rooms/boiler cupboards are well suited for re-use. Therefore, alterations to the building fabric in the listed buildings have been minimised. No internal walls will be impacted, but a new cupboard will be built in 89 Church Lawn to separate the plant from the utility space to improve the aesthetic nature of this room for holiday guests. This will be made of sustainably sourced timber and painted to match the room.
- 6.1.4 New connections between external and internal plant equipment will be needed, and so new building penetrations, or enlarging of existing penetrations will be required to facilitate the different or larger and better-insulated pipework. A typical example of an underground connection detail is shown in Figure 4, with each building varying in fabric and connection size.
- 6.1.5 Small sections of underground pipework are required to connect the external plant to the building, consisting of flow and return hot water. These will sit around 1m deep, in a 1m wide trench. Typical details are in Figure 5. All existing finishes (paving slabs, grass or hardcore/gravel) will be reinstated so this will be invisible once complete.
- 6.1.6 The NT Archaeologist has assessed the areas and due to extensive landscaping (e.g. garden terracing, localised building works) the chance of discovering anything of archaeological significance is extremely low. He therefore recommends that Archaeological Monitoring and Recording is not required (Appendix D).

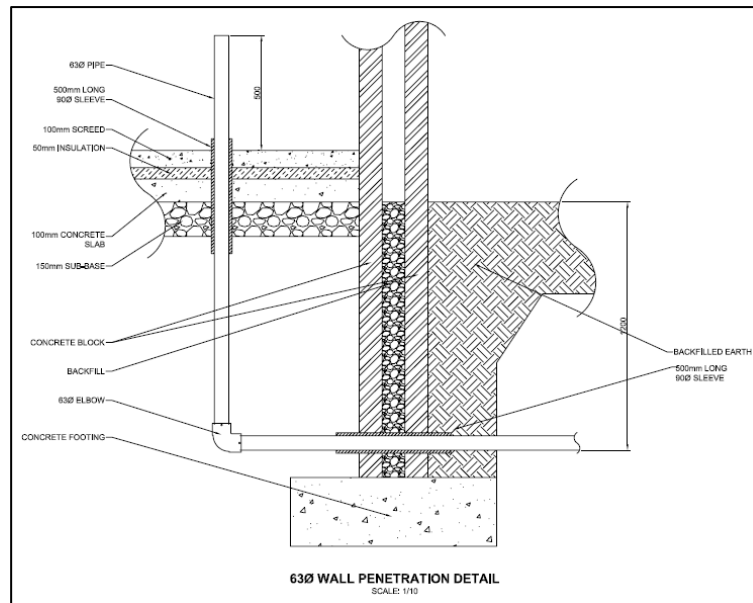


Figure 4: Typical example of a building penetration. Each building penetration will vary in construction type, finish and connection size

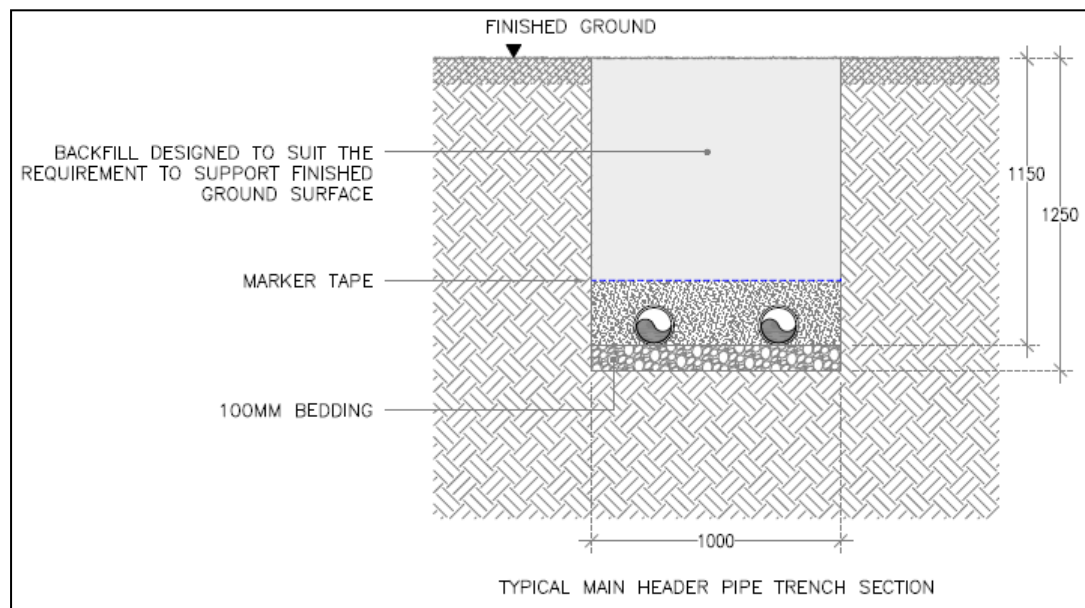


Figure 5: Typical example of Flow and Return Trench Detail

6.1.7 All oil & LPG tanks will be removed. In the case of the Estate Office, the redundant oil tank is located in the Wash House & will be removed; this ancillary building is not suitable for any new ASHP equipment and so nothing new will be installed in the Wash House. Therefore, this will be a positive impact on this building by removing a non-historic element.

- 6.1.8 All ASHPs will be fenced in using vertical hit and miss style wooden fencing, painted with a clear protective varnish. This is to provide visible screening to building users & visitors and a lockable protection against vandalism & theft. This fencing will be an extension, or adjustment of existing fencing in 89 Church Lawn and the Restaurant (Figure 6) and so we are keen to match the existing aesthetic and functionality; and entirely new at the Estate Office. Any new fencing will be concreted into the ground for longevity and supported by sleepers where required on steep slopes. There is no fencing required at Visitor Reception as this is screened by existing mature trees and away from the visitor facing area.
- 6.1.9 Exact details of all the proposals above can be found in the design drawings in Appendix A.



Figure 6: Existing vertical hit and miss fencing at 89 Church Lawn (above) and Restaurant (below) which will be retained, extended or adjusted

6.2 Ecology & Biodiversity

- 6.2.1 The NT has conservation and enhancement of its land and properties at the heart of its decision-making process. As an organisation the NT undertakes regular ecological surveys to monitor species and to understand how the management of the land could be used to enhance biodiversity.
- 6.2.2 The results of regular surveys and Preliminary Ecological Appraisal (PEA) completed by Tyler Grange (Appendix E) indicate that there is no presence of protected species in the work areas as they do not make for suitable habitats. There are therefore no risks to ecology within the works-site due to its unsuitability and the temporary nature of this work, either in the long-term or during installation. However, for due diligence purposes, the NT Ecologist for Stourhead will complete a walk-over of the site and conduct a species check on Day 1.
- 6.2.3 As stated in Appendix E, 'the proposed development is very small in scale and meets the criteria for exemption from mandatory BNG under the Biodiversity Net Gain Requirements (Exemptions) Regulations 2024. The works will impact less than 25m² of habitat and less than 5m of linear habitat' deeming this project exempt from BNG.

6.3 Landscape & Trees

- 6.3.1 The site's siting within the Cranbourne Chase National Landscape, Stourton Conservation Area and Grade I Registered Park and Garden has been heavily considered throughout the project design. The options appraisal demonstrated that installs with big impacts to the site's appearance and peaceful nature were discarded. The proposed options re-use existing plant rooms and service areas do not encroach onto existing views and have been designed to reflect the rural and unique setting. The installations are all hidden from the visitor thoroughfare and the famous views. Therefore, it is deemed that this development has no negative impacts upon the landscape and will continue to protect the local environment by eliminating the environmental risk of oil deliveries.
- 6.3.2 Of particular relevance is the ASHP proposed at 86 Church Lawn. This building has been heated by coal for the past 60 years and staff and visitors often report the smell and smoke from this pollution. By removing this and installing a clean technology, this will also improve the air quality. With nearby commercial and domestic buildings and the footpath to the landscape immediately in front, this will reduce pollution for our staff, visitors and local residents.
- 6.3.3 The National Trust recognises the importance of significant trees and other foliage that make a contribution to the setting of the listed buildings and the character of the garden and wider estate. Groundworks are minimal and have been designed outside of Root Protection Zones. Appendix F details the tree impact assessment.

6.4 Acoustic & Aesthetic Impact of the ASHPs

- 6.4.1 The units do not emit any lights upon operation and so will not impact the International Dark Skies status.

- 6.4.2 The placement of the ASHPs has been carefully considered regarding the future noise impact on visitors, neighbours and building users. As such, the NT has sought advice from Inacoustic Surveyors. They have completed a Noise Impact Assessment which has deemed the siting of the ASHPs within compliant guidelines (Appendix G).
- 6.4.3 However, for consideration for the building users, additional options have been pursued within the design to further mitigate noise impact:
- 6.4.3.1 The chosen units (Vaillant Arotherm Pro) are the quietest on the market as they use R290 as a refrigerant.
- 6.4.3.2 The ASHPs will be designed to run at a low temperature for efficiency, thereby limiting the compressor's loudest available range.
- 6.4.3.3 The ASHPs have options such as night-set back or limiting 'on' periods to daytime hours to not impact upon the tranquil overnight nature of the site. The usual daytime functioning of the area is busy with visitors, cars and gardening equipment noises.

6.5 Accessibility

- 6.5.1 This development is proposing to make-good like-for-like after completion, using existing materials, finishes and quality. Small adjustments will also be made such as improving the position of internal equipment for maintenance in line with current compliance guidelines (e.g. removing the boilers from the loft space in the restaurant and installing at ground level). Therefore, there will be an overall improvement to the levels of accessibility on the site.
- 6.5.2 During construction, some areas of the site will be blocked off to allow for sufficient Construction Design Management (CDM) Health and Safety boundaries. However, this will not inhibit any fire egress, fire-engine access or accessibility for staff or visitors during this time.

6.6 Other

- 6.6.1 This proposal will not have a detrimental impact on the amenities of nearby residential properties as they are too far away to have any noise impact, nor will the project generate lights, fumes or be visible from neighbouring windows or gardens.
- 6.6.2 Eliminating the need for regular fuel deliveries reduces the frequency of large tanker vehicles accessing the site, which in turn alleviates congestion and improves traffic flow within the village. This change contributes to a broader enhancement of local traffic management.

7 Conclusion

- 7.1 The National Trust considers that this proposal demonstrates the NT's commitment to Net Zero and climate action while also contributing to Stourhead's Green Ambition, building upon other installs such as the Electric Vehicle Charging, Biomass and Solar PV. The proposed installs are appropriate for each buildings' sensitive setting and heating needs. The NT has undertaken a full and

thorough assessment of renewable technologies to ensure that the right choice has been with no unacceptable impacts on the historic significance of Spirit of Place of Stourhead. The proposal will enable the heating systems to be installed swiftly with minimal visual or operational changes to the site's function as a visitor attraction. There will be an opportunity to educate visitors in Renewable Energy technologies and how this is sympathetic to the historic improvements in Stourhead's history.

- 7.2** All relevant national and local planning policies and Historic England guidance have been fully considered in the design and development of the project to ensure full compliance. Consequently, the NT considers that this will enable the creation of an important step forward in the sustainability and futureproofing of Stourhead and will add to the sustainable development aims of Wiltshire County Council. As the proposed development is in compliance with the Development Plan planning permission should be granted.
- 7.3** The National Trust invites members of Wiltshire County Council or consultees for a site visit as part of this application, should that be of interest.