

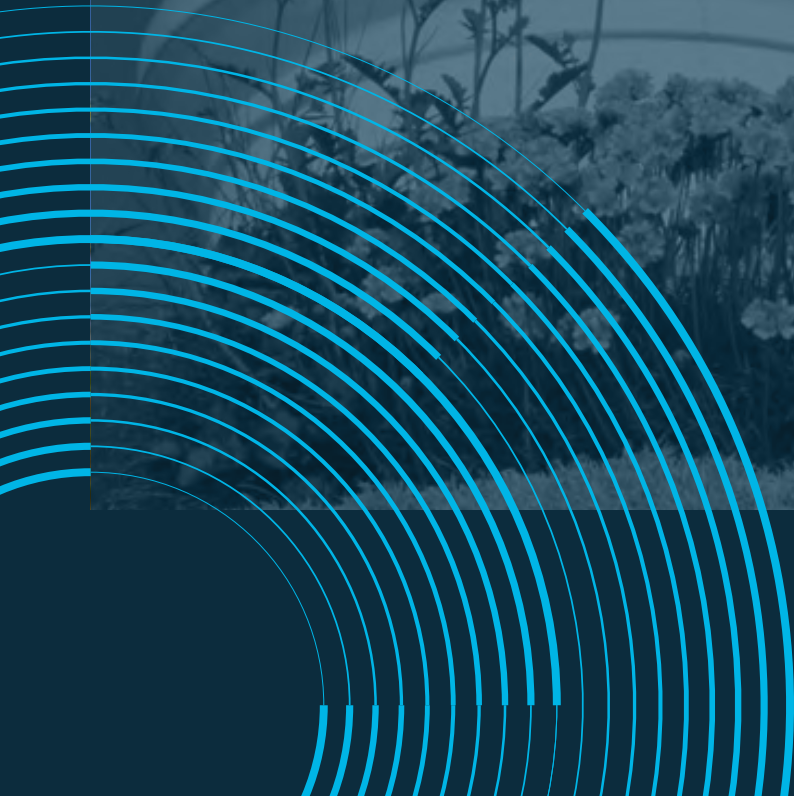


TRINITY HOUSE

APRIL 2026

Trinity House Biodiversity Plan and Report 2025

England, Wales, Gibraltar and the Channel Islands



1 Legislative context

Wales

1.1

Section 6 of the Environment (Wales) Act 2016 places an obligation on public authorities such as Trinity House to publish a Biodiversity Plan for Wales. The plan is to set out “how it shall maintain and enhance biodiversity in the exercise of functions in relation to Wales, and in so doing promote the resilience of ecosystems, so far as consistent with the proper exercise of those functions.” This document comprises that Plan.

1.2

As well as the production of a plan, Environment (Wales) Act 2016 additionally requires, in 2019 (and before the end of every third year after 2019) that Trinity House publish a report on what it has done to maintain and enhance biodiversity in the exercise of functions in relation to Wales. Trinity House produced and published such a report in 2022. This report comprises the 2025 report together with updates to its plan.

England

1.3

Pursuant to the ‘General Duty’ to conserve and enhance biodiversity under section 40 of the Natural Environment and Rural Communities Act 2006 (as amended by Section 103 the Environment Act 2021), Trinity House along with all public bodies must further “the general biodiversity objective” (being the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England).

1.4

It must “*from time to time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective.*”

Unless it concludes there is no new action it can properly take, it must;

- “*determine such policies and specific objectives as it considers appropriate for taking action to further the general biodiversity objective*”

- “*take such action as it considers appropriate, in the light of those policies and*

objectives, to further that objective”

1.5

Trinity House is not a local authority or other designated authority required to publish a Biodiversity Plan for England under Section 40A of the Natural Environment and Rural Communities Act 2006. However, Trinity House has chosen to publish its plan in any case.

General

1.6

There are no biodiversity plan obligations on Trinity House in Gibraltar and the Channel Islands which have their own legislation. However, this plan applies to the entirety of the Trinity House jurisdiction.

1.7

It should be noted that the specific legal framework in respect to Biodiversity are entirely separate from, and in addition to, existing Trinity House obligations in England and Wales under the Wildlife & Countryside Act 1980, the Conservation of Habitats and Species Regulations 2017 and the Marine and Coastal Access Act 2009. Under these pieces of legislation, Trinity House has existing, but separate obligations towards SSSIs, MCZs, SACs and SPA designations, Protected Species, Invasive Species etc.

2 Extent to which promoting resilience of ecosystems is consistent with Trinity House's statutory functions

2.1

As the General Lighthouse Authority (GLA) for England, Wales, Gibraltar and the Channel Islands, Trinity House is required and empowered by the Merchant Shipping Act 1995 with regard to the superintendence and management of all (operational) lighthouses, buoys and beacons. Together, these are known as Aids to Navigation (AtoN).

2.2

As well as operating its own general AtoN, Trinity House has superintendence responsibility for AtoN operated by Local Lighthouse Authorities (usually statutory harbour authorities). Additionally, Trinity House has powers of wreck-marking and removal and acts as a consultee and expert witness in third party applications for planning permission, marine licences, development orders and related appeals and inquiries.

2.3

Of the 64 lighthouses that Trinity House operates, 16 of these are in Wales and 43 are in England. Trinity House has one lighthouse in Gibraltar and four in the Channel Islands. Some of these lighthouses (but by no means all) include curtilage that is owned by Trinity House. Historically, such curtilage provided gardens for cultivation and other facility for the lighthouse keepers who resided on site, as well as enabling access to the sea for supplies. However, the area of land owned by Trinity House is not extensive.

2.4

Trinity House's funding is derived from Light Dues – a ring-fenced tax on shipping. The rate of Light Dues is set by the UK Government on an annual basis to ensure that the General Lighthouse Authorities are challenged to “remain firmly focused on delivering an efficient, value for money service” (<https://www.gov.uk/government/speeches/updating-light-dues-payment-rates>).

Unlike most public bodies, Trinity House carries out its function at no expense to the UK taxpayer. The recipient of the aids to navigation service (the mariner) is the same at that which funds the service.

2.5

The Government's Framework for General Lighthouse Authorities can be read here;

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/622239/general-lighthouse-authorities-framework.pdf

To quote paragraph 2.1.4, “*The DfT (on behalf of the Secretary of State for Transport) has a duty to ensure the effective management of the GLF (General Lighthouse Fund) and to enable the adequate provision of AtoN at the least cost and to deliver Value for Money*”.

2.6

All of this means that Trinity House is obliged to exercise its functions in a manner that affords best value to the General Lighthouse Fund in the provision of its AtoN service. Increasing its costs as a result of activities that are unrelated to its functions and are not a specific legal requirement (such as maintaining or enhancing biodiversity) may therefore be seen to be *ultra vires*.

3 Review of Trinity House's current approach to maintaining and enhancing biodiversity

3.1

It is challenging and perhaps fruitless to disentangle an approach to biodiversity from other environmental plans, policies and initiatives that Trinity House is engaged in. Ongoing attempts (for example) to reduce CO2 emissions, reduce plastic, paper and water use all improve the prospects for pollution-sensitive species and global warming - and so for biodiversity.

3.2

Trinity House works to an Environmental Management System that is certificated as being in conformance with the ISO14001 standard. This international standard requires organisations to establish an environmental management system, the aim of which *“is to provide organizations with a framework to protect the environment and respond to changing environmental conditions in balance with socio-economic needs. It specifies requirements that enable an organization to achieve the intended outcomes it sets for its environmental management system”*.

3.3

Key to compliance with the standard is maintaining an Environmental Policy that provides a framework for setting environmental objectives and includes a commitment to the protection of the environment, and other specific commitment(s) relevant to the context of the organisation (including climate change). Specifically, it sets Trinity House's policy in regard to Biodiversity as being to *“Avoid harm to habitats and protected species”*. At Trinity House, the Environmental Policy is reviewed annually and is available for download here;

<https://www.trinityhouse.co.uk/about-us/media-centre/publications>

3.4

Trinity House's Environmental Policy informs its **Sustainability Working Group** and its **Aspects**

& **Impacts Register** as well as its other policies and processes.

3.5

This focus on *avoiding harm* to Biodiversity (rather than necessarily enhancing) reflects the nature of Trinity House's estate and operation. Trinity House's Estate is small, disparate, unmanned and remote. It is therefore not practical to measure / benchmark biodiversity at a micro level on such an estate. Nor would it be especially beneficial. Trinity House's approach is therefore focused on the practical steps it can take which (although impossible to measure) would be highly likely to protect biodiversity.

3.6

The innate benefits to biodiversity afforded through Trinity House's statutory function cannot be underestimated. By fulfilling its function effectively and efficiently, Trinity House plays a major role in preventing marine accidents. It goes without saying that the environmental consequences of marine accidents can be catastrophic to marine life, birds and terrestrial shore flora and fauna. Through reducing the risk of marine accidents (and resulting significant pollution events), Trinity House's work is fundamentally aligned with the overall objectives of protecting and enhancing biodiversity.

3.7

Whilst the estate is small, the protection of biodiversity that comes from being part of the Trinity House estate should also not be under-estimated. Lighthouse sites are private property, deterring more exploitative uses and uncontrolled casual visitors alike and resulting in a low intervention in natural landscapes. This is particularly the case since lighthouses were automated. In at least one case (Nash Point, Wales) a SSSI is designated that comprises only the extent of the lighthouse compound – reflecting how Trinity House's occupation and operation have allowed nature to thrive.

3.8

There are of course opportunities to minimise the minor negative impacts that result from the activity Trinity House undertakes as it carries out its function of overwhelming benefit to biodiversity interests. This plan seeks to identify such opportunities and sets out its approach to them.

3.9

Separately there are collective impacts on pollution, carbon emissions and resource exploitation resulting from Trinity House's operation. Alongside all sectors of society, there are opportunities for Trinity House to contribute to a reduction in such impact.

4 Biodiversity Plan Objectives

4.1

This plan's objectives are to take account of the resilience of ecosystems, in particular the following aspects—

- a. diversity between and within ecosystems;
- b. the connections between and within ecosystems;
- c. the scale of ecosystems;
- d. the condition of ecosystems (including their structure and functioning);
- e. the adaptability of ecosystems.

4.2

The 1992 Convention on Biological Diversity (CBD) carries an internationally accepted definition of biodiversity as being “... *the variability among living organisms from all sources, inter alia, terrestrial, marine and other aquatic ecosystems and ecological complexes of which they are part, this includes diversity within species, between species and of ecosystems*”.

5 The Plan

The following section identifies the opportunities at Trinity House for reducing its impacts upon and enhancing biodiversity and the measures taken to achieve that.

5.1

Minimise Potential for Impact of Works on Biodiversity

Trinity's works to maintain its lighthouse estate are generally low key with little potential for interaction with protected species or designated sites. Transport to remote sites by boat and especially helicopter afford the greatest potential for significant harm.

To minimise such potential, Trinity House will;

- a. Hold a work plan of all of its routine operations across all of its sites and secure Natural Resources Wales / Natural England assent for such activities and plan its operations to minimise impacts on biodiversity.
- b. Hold a Habitats Work Instruction establishing processes for all works to minimise impact on biodiversity (including those outside of the scope of (a) above.
- c. Liaise closely with Natural Resources Wales / Natural England and with relevant nature conservation groups in planning operations.

This will ensure that we have the proper advice on minimising our impacts (such as where and when to avoid helicopter operations so as to avoid disturbing bird-breeding colonies. It will enable Trinity House to plan around sensitive locations and seasons.

5.2

Minimise potential for biosecurity incursions

Trinity House operates on multiple island sites that hold important bird colonies which are extremely sensitive to mammalian predator incursion.

To minimise such potential, Trinity House will;

- d. Produce a Biosecurity Plan scoping the risk pathways and establishing measures to prevent, monitor and respond to potential incursions.

5.3

Raise awareness of biodiversity issues and risks amongst all staff

Trinity House will;

e. Offer training to all staff who work in the field on biodiversity matters through its internally run Environmental Law training sessions and other ad hoc training as required.

5.4

Work alongside nature conservation bodies and organisations

Trinity House will;

f. Partner with third party nature conservation organisations (where practicable) to exploit opportunities to facilitate their work in enhancing biodiversity.

5.5

Improve land management to support biodiversity where practicable

Trinity House will;

g. Respond positively (where practicable) to approaches from nature conservation bodies recommending steps to enhance designated sites through its land management

5.6

Minimise Pollution risks from Trinity House activity

To achieve this, Trinity House will;

h. Hold a work instruction on Pollution, including a reporting mechanism for incidents and/or near misses.

i. Incorporate processes to minimise risk into the Marine Manual and other process documents within the management system.

5.7

Reduce our carbon footprint and use of finite resources

Trinity House's potential impact on biodiversity goes beyond its own estate. By far the greatest threat to biodiversity comes through the climate change, pollution and the exploitation of finite resources. Like everybody else, Trinity House has a responsibility to reduce such collective impact. Its approach to doing so is set out in its Corporate Plan 2026/31. This plan

and the following provisions of course apply across Trinity House's operation and objectives cannot readily or beneficially be separated out for England or Wales.

By 2030 (from a 2017/18 baseline unless otherwise stated), Trinity House will hold the following targets;

j. Reduce greenhouse gas emissions by 30%

k. Reduce Vessel fuel consumption per nautical mile by 15% (from 2025 baseline)

l. Reduce Scope 1 direct emissions by 30%

m. Maintain 100% of cars as zero emission

n. Achieve 60% target of vans as zero emission

o. Reduce Business travel on domestic flights

p. Reduce business travel on international flights

q. Reduce Operational waste from 646 to less than 350 tonnes

r. Increase percentage of waste recycled to above 95%

s. Reduce waste to landfill from 5% to under 2%

t. Reduce paper use from 948 reams to under 200 reams

u. Reduce water consumption by 20%

v. Achieve a mature sustainable procurement model

w. Continuous improvement in supplier sustainability and lifecycle performance management

x. Achieve 50% of operational sites having renewable energy generation.

6 Report on how Trinity House has maintained and enhanced biodiversity in the exercise of functions

a. Hold a work plan of all of its routine operations across all of its sites and secure Natural Resources Wales / Natural England assent for such activities and plan its operations to minimise impacts on biodiversity

An extant assent for all Trinity Houses routine works across its estate in Wales is agreed with Natural Resources Wales (NRW), and separately with Natural England (NE). These assents include conditions and guidance on how to implement the work plan in a way that minimise potential impact on biodiversity. This is integral to Trinity House's project planning and it will seek the review and renewal of this document when it expires.

No known incidents of harm to protected species or designated habitat features have occurred.

b. Hold a Habitats Work Instruction establishing processes for all works to minimise impact on biodiversity (including those outside of the scope of (a) above

A Habitats Work Instruction is adopted into Trinity House's management system and establishes safe ways of working that ensure potential impact on biodiversity is minimised. Trinity House will periodically review this document to ensure that it is current

c. Liaise closely with Natural Resources Wales / Natural England and with relevant nature conservation groups in planning operations

Full details of projects together with our own internal SSSI and habitats assessments are submitted to NRW/NE ahead of any major works and Trinity House works with NRW/NE to minimise impacts on habitats. A recent example in 2024/25 was Skerries (Wales) modernisation where Trinity House worked in close liaison with the RSPB wardens to plan its works prior to submission to NRW, ensuring that potential impact on birds was minimised at every step of the projecting plan and delivery. Furthermore, the project increased the solar generation capacity of the station

significantly so as to reduce reliance on diesel-fired generators. This has emissions benefits and also reduces the inherent environmental risk in transporting diesel to this remote and environmentally sensitive location.

Another is for ongoing modernisation works at Coquet (England) 2025/26 where the same multi-agency co-operation is happening to ensure essential works are delivered in a way that minimised potential impact on biodiversity. As with The Skerries, the project itself includes significant enhancement in solar generation, leading to the same biodiversity benefits described there. Furthermore, Trinity House is assisting the RSPB in upgrading its wastewater discharge systems.

d. Produce a Biosecurity Plan scoping the risk pathways and establishing measures to prevent, monitor and respond to potential incursions

A first draft has been produced. Meanwhile, Trinity House continue to liaise with relevant nature conservation bodies, following their advice so as to minimise potential for biosecurity breaches.

Trinity House has been liaising with relevant partners such as Biosecurity for England and the RSPB to ensure a joined-up approach.

e. Offer training to all staff who work in the field on biodiversity matters through its internally run Environmental Law training sessions and other ad hoc training as required

Environmental Law training was delivered in financial year 2025/26 to 28 participants over 3 sessions. Other initiatives have included Biosecurity for Life talks to all operational staff.

f. Partner with third party nature conservation organisations (where practicable) to exploit opportunities to facilitate their work in enhancing biodiversity

A further 5-year management agreement (commencing March 2025) has been agreed with the RSPB and NRW for the management of the SSSI at Trinity House's Skerries Islands (Wales). To facilitate this, Trinity House has agreed the continued use part of its former keepers' accommodation so that the RSPB wardens can stay on island during bird breeding season. The arrangement ensures that this internationally important bird colony is cared for and is thriving.

Trinity House additionally leases property at Skokholm Island (Wales) to The Wildlife Trust of South and West Wales who work to improve wildlife on this important island, their wardens operating out of this Trinity House accommodation.

g. Respond positively (where practicable) to approaches from nature conservation bodies recommending steps to enhance designated sites through its land management

In liaison with NRW, Trinity House has agreed a method of mowing and scarifying the wildflower meadow at Nash Point Lighthouse to the benefit of the SSSI there.

Trinity House is a member of several Relevant Authority Groups managing marine habitats. These include;

- the Association of Severn Estuary Relevant Authorities (ASERA) and
- the Relevant Authorities for Pen Llyn a'r Sarnau SAC
- Berwickshire and Northumberland Marine Nature Partnership

The following section identifies the opportunities at Trinity House for reducing its impacts upon and enhancing biodiversity and the measures taken to achieve that.

h. Hold a work instruction on Pollution, including a reporting mechanism for incidents and/or near misses

A Pollution Work Instruction is adopted into Trinity House's management system and establishes safe ways of working that ensure that risks of pollution from Trinity House activity is minimised. Trinity House will periodically review this document to ensure that it is current.

There have been no reportable pollution incidents in this plan period but minor incidents and near misses are reported through a well-established incident reporting system which all staff are encouraged to use.

i. Incorporate processes to minimise risk into the Marine Manual and other process documents within the management system

Processes are established in the Marine Manual and elsewhere.

j. Reduce greenhouse gas emissions by 30%

Emissions reduced from 8,850 (2017/18) to 7,641 (2024/25) tonnes of carbon dioxide equivalent. Continued decarbonisation will be achieved through low-emission vessel investment (Futures Afloat), eco-streaming programmes, fleet electrification, and renewable energy expansion.

k. Reduce Vessel fuel consumption per nautical mile by 15% (from 2025 baseline)

Trinity House will introduce a normalised emissions metric to decouple fuel consumption from operational activity. This data will be collected through new vessel telemetry and logbook systems.

l. Reduce Scope 1 direct emissions by 30%

Reductions expected from improvements to heating management, building insulation, and expansion of solar systems across depots and offices.

m. Maintain 100% of cars as zero emission

Will be sustained through ongoing renewal policy and infrastructure readiness.

n. Achieve 60% target of vans as zero emission

Have increased from 0% (2017/18) to 13% (2024/25). Further gradual transition will be aligned with OZEV exemption, market availability, and operational suitability for remote and coastal use.

o. Reduce Business travel on domestic flights

Reductions will be achieved via digital meeting tools, travel hierarchy, and rail-first policy.

p. Reduce business travel on international flights

Limited to essential operational needs; emissions offsetting under review.

q. Reduce Operational waste from 646 to less than 350 tonnes

Reduced from 646 (2017/18) to 211 (2024/25) tonnes, however waste volumes fluctuate with project intensity so the low 2024/25 figure is viewed as an anomaly. Improved contractor waste segregation and data tracking expected to stabilise data.

r. Increase percentage of waste recycled to above 95%

Percentage recycled has dropped since 2017/18 baseline, but the 2030 target of 95% by 2030 is still expected to be achieved. Strengthened waste management contracts and reuse initiatives will be key to this.

s. Reduce waste to landfill from 5% to under 2%

Waste to landfill has increased since 2017/18 baselines, but the 2030 target of under 2% is still expected to be achieved through supplier performance monitoring and improved waste logistics.

t. Reduce paper use from 948 reams to under 200 reams

Significant improvement from 948 (2017/18 to 328 (2024/25) reams. This improvement will be sustained through electronic documentation, e-signature systems, and digital workflows.

u. Reduce water consumption by 20%

Reduction achieved from 11,607 (2017/18) to 8584 (2024/25) cubic meters. Further efficiencies through smart metering, leak detection, and rainwater reuse systems will sustain this reduction in consumption.

v. Achieve a mature sustainable procurement model

Trinity House will embed whole-life environmental, social, and economic value in all procurements, underpinned by full GBS compliance.

w. Continuous improvement in supplier sustainability and lifecycle performance management

In development. Incorporates ESG questionnaires, lifecycle cost analysis, and sustainability performance clauses for Tier 1 suppliers.

x. Achieve 50% of operational sites having renewable energy generation

Progressive installation of solar and renewable systems at lighthouses, depots, and offices; feasibility studies for small-scale energy storage underway.



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