



WINCOMBE LODGE, WINCOMBE PARK ESTATE, DONHEAD St MARY, WILTS

PRELIMINARY ECOLOGICAL APPRAISAL AND PHASE 2 BAT SURVEY

Final Report
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Executive Summary

This report has been prepared by Bourne Ecology on behalf of Mr. J. Fortescue, who is proposing to submit a planning application for modification of the existing residential dwelling at Wincombe Lodge located at Wincombe Park Estate, Donhead St Mary, Wilts, SP7 9AB. These works will include the construction of additional first floor living space above an existing area of ground floor flat roof and re-roofing works at the property. Clearance of a small area of shrubby planting, along with minor landscaping works are also proposed.

This report includes ecological information on Wincombe Lodge gathered by Bourne Ecology, an assessment of the likely impacts of the proposals, any ecological constraints to works on site and a mitigation strategy providing additional enhancements for biodiversity.

A Preliminary Ecological Appraisal (PEA) was undertaken by Des Purdy of Bourne Ecology on 15th August 2025. This involved a walkover survey of the Site, internal and external inspection of all buildings affected by proposals, as well as a daytime inspection of adjacent habitats which may be potentially impacted by proposals within the development boundary.

During the PEA, evidence of roosting bats was found in the loft space of the residential dwelling in the form of a small number of scattered droppings. Subsequent DNA analysis of collected droppings confirmed these to have originated from Common Pipistrelle (*Pipistrellus pipistrellus*). Multiple potential bat access points were noted around the property, including around missing mortar below ridge tiles in several locations, below raised and naturally profiled roof tiles and in areas around the joins between soffits and exterior masonry. The building was assessed according to current guidelines (Collins, 2023) as providing 'high - confirmed' bat roost potential based on the presence of bat droppings within the loft, the number of potential bat access features and the building's location within high quality bat habitat.

Based on the preliminary site appraisal and currently submitted plans, further ecological survey effort is required to determine the potential effects of the proposed development on bats. Additional bat emergence surveys have been carried out to confirm the presence/likely absence of roosting bats before modification of the property. Survey results have informed a suitable mitigation strategy and will ensure the continued favourable conservation status of protected species on site.

As a result of the Preliminary Roost Assessment of Wincombe Lodge, three Phase 2 Bat Emergence Surveys, using four surveyors during each survey, were subsequently carried out during the bat active season between 22nd August 2025 and 17th September 2025 to determine the numbers and species of bat(s) using the building, based on current BCT Survey Guidelines (Collins, 2023). A maximum count of four Common Pipistrelles were observed and filmed emerging from seven different roost sites across the roof structure during surveys. Single roost sites used by an individual Soprano Pipistrelle (*Pipistrellus pygmaeus*) and individual small Myotis sp. (likely Brandt's Bat (*Myotis brandtii*)) based on analysis of echolocation calls) were also identified during the surveys. Low numbers of Common Pipistrelles, as well as occasional passes from individual Soprano Pipistrelle, a *Myotis* sp, Lesser Horseshoe (*Rhinolophus hipposideros*), Long-eared bat (*Plecotus* sp.), Barbastelle (*Barbastella barbastellus*) Noctule (*Nyctalus noctula*) and Serotine (*Eptesicus serotinus*) were observed or recorded commuting or foraging around the property and nearby woodland during the Phase 2 surveys. A European Protected Species Licence will be required to legally carry out the proposed works.

It is probable that the regularly maintained wider site, largely comprising of short sward amenity grassland and ornamental shrubby and herbaceous planting, presents some opportunity for nesting birds, both within shrubby vegetation and mature trees. These same trees and shrubs may also provide foraging areas and commuting corridors for local bat species. The majority of the area within

the Site boundary lacks the required structure and has limited potential to support common and widespread reptile species and protected amphibians, such a great crested newt. With the exception of those areas immediately surrounding the existing dwelling, proposals will retain all current on-site planting following development.

A mitigation strategy has been designed that takes into account the full assessment of the Site and will ensure that the potential impacts on protected ecological receptors are appropriately mitigated. These recommendations are made to include enhancements for biodiversity, in line with local and national planning policy. The mitigation strategy includes the careful timing, phasing and supervision of works. Proposed mitigation and enhancements include new bat roosting features, bird nesting features and enhancements to the Site for invertebrates. These will promote the favourable conservation status of protected species both at the Site and within the local area.

The impacts of proposals are considered to be low and are limited to the current building location and nearby areas of amenity garden.

1. Introduction

Background

- 1.1 Bourne Ecology was commissioned by Mr. J. Fortescue to undertake a Preliminary Ecological Appraisal (PEA) of the residential dwelling at Wincombe Lodge and surrounding garden (see **Appendix 2 & 3** for Site location and boundary map). A Preliminary Ecological Appraisal is essentially an initial stage survey that aims to identify habitats and features within and adjacent to the site boundary and assess the sites' potential to support protected species and habitats of value.

Brief

- 1.2 To conduct a Preliminary Ecological Appraisal and subsequent Phase 2 bat emergence surveys arising as a requirement of the PEA, to advise the Client of the ecological implications of their proposals and any further survey work necessary. Survey outcomes have informed a mitigation strategy, ensuring there are no negative impacts on nearby habitats or the favourable conservation status of protected species currently using the Site.

Development Proposals

- 1.3 The planning application proposes modification to the existing dwelling on site. This will require re-roofing works and the construction of additional first floor bedroom space above an existing area of flat-roofed ground floor at the property. The existing building footprint will be maintained. This will require re-roofing the dwelling and disturbance to habitats surrounding the building. Proposals will require the removal of a small area of shrubby planting immediately adjacent to the south of the property to allow views of the garden and minor landscaping alterations to the east of the residential dwelling to create a small parking area (see **Appendix 5**).

Site Context

- 1.4 Wincombe Lodge lies to the north of Wincombe Park, Donhead St Mary, Wilts, SP7 9AB at Ordnance Survey grid reference ST 88444 24983 (see **Appendix 2 & 3**). The Site lies approximately 2.5km northeast of the centre of Shaftesbury. The Site is situated within an immediate area that is rural in character.
- 1.5 The Site lies within the Cranborne Chase and West Wiltshire Downs AONB. The Site's closest Statutory Protected Wildlife Site is Gutch Common Site of Special Scientific Interest (SSSI), which is located 400m northeast of the boundary of the Site at its nearest point.

Relevant Legislation and Policy Implications

Relevant Legislation

- 1.6 The key legislative provisions of relevance to this report with respect to the development proposals and their potential effects on ecological features are listed below, with further detail provided in **Appendix 1**.

- The Habitats and Species (Amendment) (EU Exit) Regulations 2019
- The Wildlife and Countryside Act 1981
- The Countryside and Rights of Way (CROW) Act 2000
- The Natural Environment and Rural Communities (NERC) Act 2006
- The Badgers Act 1992

Biodiversity Action Plans

- 1.7 The UK Biodiversity Action Plan (BAP) was the Government's response to the 1992 Convention on Biodiversity (The Rio Convention), with the aim of halting the loss of biodiversity in the UK. The new UK post-2010 Biodiversity Framework replaces the previous UK Biodiversity Action Plan and is the government's response to the new strategic plan on the United Nations Convention on Biological Diversity (CBD). Although the UK Post-2010 Biodiversity Framework supersedes the UK BAP, the UK BAP lists of priority species and habitats still remain an important reference source for identifying habitats and species of principal importance within England, Wales, Northern Ireland and Scotland. Within England, Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 list species and habitats of principal importance for the conservation of biodiversity.

Planning Implications

- 1.8 The Government has set out its policies for the protection and enhancement of biodiversity in the planning system within the revised National Planning Policy Framework (NPPF, 2024) which states that plan policies and planning decisions should aim to maintain and enhance, restore or add to biodiversity and geological conservation interests'. The key principles of the NPPF describe the importance of avoiding, mitigating and compensating for adverse effects.
- 1.9 The Site is situated within the Wiltshire Council planning area. The Wiltshire Council Local Plan (Adopted 2015) (Wiltshire Council, 2015) contains Strategic Objective 5 and Core Policy 50, which are of relevance to the proposed development. Strategic Objective 5 relating to protecting the natural, built and historic environment states:

Proposed development on land within or outside a SSSI likely to have an adverse effect on a SSSI will be determined in accordance with the requirements of paragraph 118 of the NPPF and Circular 06/2005. The valuable natural environment includes not only identified sites, but also other features of nature conservation value including:

- priority species and habitats (including those listed in the national and Wiltshire Biodiversity Action Plan)*
- areas of habitat with restoration potential (particularly those identified on the South West Nature Map or through other landscape scale projects)*
- all waterbodies covered under the Water Framework Directive*
- features providing an ecological function for wildlife such as foraging, resting and breeding places, particularly wildlife corridors of all scales which provide ecological connectivity allowing species to move through the landscape and support ecosystem functions.*

Core Policy 50

Biodiversity and Geodiversity

Protection

Development proposals must demonstrate how they protect features of nature conservation and geological value as part of the design rationale. There is an expectation that such features shall be retained, buffered, and managed favourably in order to maintain their ecological value, connectivity and functionality in the long-term. Where it has been demonstrated that such features cannot be retained, removal or damage shall only be acceptable in circumstances where the anticipated ecological impacts have been mitigated as far as possible and appropriate compensatory measures can be secured to ensure no net loss of the local biodiversity resource, and secure the integrity of local ecological networks and provision of ecosystem services.

All development proposals shall incorporate appropriate measures to avoid and reduce disturbance of sensitive wildlife species and habitats throughout the lifetime of the development.

Any development potentially affecting a Natura 2000 site must provide avoidance measures in accordance with the strategic plans or guidance set out in paragraphs 6.75-6.77 where possible, otherwise bespoke measures must be provided to demonstrate that the proposals would have no adverse effect upon the Natura 2000 network. Any development that would

have an adverse effect on the integrity of a European nature conservation site will not be in accordance with the Core Strategy.

Biodiversity enhancement

All development should seek opportunities to enhance biodiversity. Major development in particular must include measures to deliver biodiversity gains through opportunities to restore, enhance and create valuable habitats, ecological networks and ecosystem services. Such enhancement measures will contribute to the objectives and targets of the Biodiversity Action Plan (BAP) or River Basin/ Catchment Management Plan, particularly through landscape scale projects, and be relevant to the local landscape character.

Local sites

Sustainable development will avoid direct and indirect impacts upon local sites through sensitive site location and layout, and by maintaining sufficient buffers and ecological connectivity with the wider environment. Damage or disturbance to local sites will generally be unacceptable, other than in exceptional circumstances where it has been demonstrated that such impacts:

- i. cannot reasonably be avoided*
- ii. are reduced as far as possible*
- iii. are outweighed by other planning considerations in the public interest*
- iv. where appropriate compensation measures can be secured through planning obligations or agreements.*

Development proposals affecting local sites must make a reasonable contribution to their favourable management in the long-term.

2. Methodology

Introduction

- 2.1 Methodology for the evaluation of the site and assessment of the potential impacts has been based on the Bat Conservation Trust Best Practice Guidelines (Collins, 2023) and UK Bat Mitigation Guidelines (Reason & Wray, 2023). Additional methodology for the evaluation of the site and assessment of the potential impacts has been based on the Guidelines for Ecological Impact Assessment (EclA) in the United Kingdom published by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018). Methodology for the undertaking of any necessary targeted protected species surveys have been based upon Best Practice Guidelines for each species/species group (Collins, 2023) and these have also been used to evaluate relevant features in combination with additional CIEEM guidelines (2017).

Defining the Zone of Influence

- 2.2 In order to define the spatial scope of the ecological survey at Wincombe Lodge, it is necessary to predict the likely zone of influence of the development proposals. The zone of influence of a proposed development is defined by CIEEM's EclA guidelines as '*...the areas (ecological) resources that may be affected by the biophysical changes caused by a development, both in the construction and operational phases*'.
- 2.3 The types of activities that might occur as a result of the development at Wincombe Lodge and the likely biophysical changes (in the absence of mitigation) include:
- a. Modifications to the roof structure of the existing residential dwelling, with potential impacts on roosting bats and nesting birds, if present during works;
 - b. Clearance of a small area of dense cherry laurel measuring approximately 7m x 9m to facilitate a new parking area east of the property and disturbance to nearby boundary habitats, with potential impacts on nesting birds;
 - c. The removal of a short section of non-native shrubby planting to the south of the property, with potential impacts on nesting birds;
 - d. Temporary disturbance to nearby habitats during construction, with potential impacts on nesting and foraging birds and commuting and foraging bats;
 - e. An increase of noise and dust during the construction phase.

Desktop Study

- 2.4 The desk study methodology is based upon guidelines set out by the Chartered Institute of Environmental and Ecological Management (CIEEM, 2017). Given the limited scale of the proposed development, a data-gathering exercise was undertaken to obtain information relating to statutory designated sites and key protected species which may be within the zone of influence or may otherwise be adversely affected by development proposals. This involved requesting bat records within 2km from Wiltshire and Swindon Biological Records Centre (WSBRC), as well as interrogating Natural England's "Nature on the Map" (MAGIC), to establish protected sites and habitats within the likely zone of influence of the proposals. Key species records are summarised within this report and a full list of records is available on request.
- 2.5 Previous bat surveys available to view on the planning portal were also reviewed in order to collect additional information of bats recorded within the vicinity of the site.

Preliminary Ecological Appraisal

- 2.6 An initial survey of the Site was undertaken on 15th August 2025 by Des Purdy (Natural England Bat Licence N^o: 2022-10462-CL18-BAT, Great Crested Newt Licence N^o: 2015-16101-CLS-CLS, Dormouse Licence N^o: 2017-32630-CLS-CLS) of Bourne Ecology during calm and partly overcast weather conditions and an ambient temperature of 21°C. The survey is essentially an ecological appraisal of the site. The habitats and features within the site boundary were noted and classified. In addition, any evidence of, or potential for protected species to be on the Site or within the Zone of Influence was recorded.

Bats

Overview

- 2.7 The bat survey comprised of a combination of an assessment of habitats within the zone of influence of proposals and a daytime inspection of any buildings on site.

Daytime Inspection of Buildings within the Site Boundary

- 2.8 A daytime inspection of Wincombe Lodge for bats was carried out (internal and external areas). The building was searched for evidence that bats may be using, or previously have used, the building for roosting. Such evidence may include:
- The presence of bats;
 - Bat droppings within the building or on external surfaces on and/or immediately adjacent to the building; and

- Staining or scratch marks around suitable bat roost locations or suitable access points into the building.

- 2.9 Any accessible voids were searched using a very bright torch. The external inspection of the buildings involved searching for evidence with the use of a torch and binoculars.
- 2.10 Bats may roost in locations that are inaccessible to a surveyor, such as in between roof linings and exterior tiles, gaps under hanging tiles, within soffits etc. Therefore, potential areas for bats to roost or potential access points were also noted during the survey in order to assess the buildings 'potential' to support roosting bats, in line with Bat Conservation Trust best practice guidelines (Collins, 2023). An assessment of the buildings' potential value to bats was made at this initial inspection stage in order to determine the level of any further survey work required to fully assess the site for bats.

Table 2.1: Assessment of Bat Roost Suitability of Buildings

Potential	Criteria
Negligible	Negligible features on site likely to be used by bats
Low	Potential features present which may support low numbers of bats irregularly but no suitable features for regular use by large numbers of bats
Moderate	A building with one or more potential roost features that may be used by bats due to their size, shelter, protection, condition and habitats present. Unlikely to support a roost of high conservation value
High	A building with one or more potential roost sites that are suitable for use by a large number of bats on a regular basis

Phase 2 Bat Surveys

- 2.11 Following the identification of Common Pipistrelle droppings within the loft void at Wincombe Lodge, the building was assessed as providing 'high - confirmed' bat roost potential and further surveys were undertaken to assess the presence, species and numbers of roosting bats in order to characterise any roost types. The methodology for surveys comprised of three emergence surveys based upon BCT Best Practice Guidelines (Collins, 2023).
- 2.12 Four surveyors in total (for each of three surveys) were positioned around Wincombe Lodge, at locations identified as allowing good sight lines and ensuring that all potential bat access/egress points were visible between the surveyors. Each surveyor was equipped with

either an Echometer Touch 2 Pro or Anabat Walkabout to record any unidentified calls for subsequent computer analysis.

- 2.13 All observers used during emergence/re-entry surveys are experienced bat surveyors (NE Class 2 Bat Licence numbers shown in brackets), including Des Purdy (2022-10462-CL18-BAT), Robert West (2018-33612-CLS-CLS), Peter Allan, Anna Bright and Shona Campbell.
- 2.14 Each surveyor was supplied with a plan of the site on which to mark bat activity. The following information was recorded for any bats seen or heard:
- Species;
 - Time;
 - Behaviour (whether it was feeding, commuting, social calling or swarming);
 - If seen, direction of flight; and
 - If it emerged or re-entered the building.
- 2.15 Behaviour was identified by flight patterns and call characteristics, as heard on the bat detector. Weather conditions (temperature, wind speed/direction, cloud cover, rainfall in the last hour) were also recorded at the start and end of each survey.
- 2.16 During emergence/re-entry surveys, the building was also filmed using night vision aids (NVAs). Thermal Imagers (Pixfra Arc A613) and Infra-Red cameras (Canon XA11) using 850nm IR Illuminators were used to identify potential bat roost locations within and around the building during low light conditions.
- 2.17 Three dusk emergence surveys were conducted at Wincombe Lodge on 22nd August, 4th September and 17th September 2025.

Table 2.2 *Timings & weather conditions of bat surveys undertaken at Wincombe Lodge.*

Date	Type	Personnel	Start	End	Sunset/ Sunrise	Weather
22/08/25	Dusk Emergence	Des Purdy Robert West Peter Allan Anna Bright	20:29	22:14	20:44	Start temp – 18.3°C, finish temp – 16.2°C, wind BF 1-2, cloud 100%, no rain
04/09/25	Dusk Emergence	Des Purdy Robert West Peter Allan Anna Bright	19:33	21:18	19:48	Start temp – 15.5°C, finish temp – 14.3°C, wind BF 1-2, cloud 80%, no rain.

18/09/25	Dusk Emergence	Des Purdy Robert West Peter Allan Shona Campbell	19:00	20:45	19:15	Start temp - 17.1°C, finish temp – 16.0°C, wind BF 1-2, cloud 0%, no rain
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Birds

- 2.18 Any habitat features, for example buildings, scrub, hedgerows and trees, which could potentially be used by nesting birds were surveyed and any nesting activity was noted. The habitat was also assessed regarding its potential for bird activity.

Reptiles

- 2.19 During the survey, habitats within the site boundary were assessed for their potential to support reptiles. In addition, the surrounding landscape and adjoining habitats were appraised for their potential to support reptiles in order to ascertain the likelihood of these species being present. Any natural refugia encountered were inspected for reptile presence.

Dormice (*Muscardinus avellanarius*)

- 2.20 Habitats within and adjacent to the Site boundary were considered for their potential to support dormice. The structure of any boundary and woody habitats were noted and the composition of species, as well as links to other patches of suitable habitat in the surrounding area was considered. During the desktop study aerial maps were referred to, in order to assess how well linked any suitable habitats on the Site are to those surrounding habitats within the wider landscape.

Amphibians

- 2.21 During the PEA the site was searched for any ponds. Ordnance survey maps and aerial photos were assessed for the presence of ponds within 500m of the boundary. The terrestrial habitats within and adjacent to the site boundary were assessed for their suitability for amphibian species presence and habitats were mapped and described during the preliminary ecological appraisal.

Badgers (*Meles meles*)

- 2.22 The Site and its environs were searched for any evidence of badger activity, as well as setts. Any signs were recorded and any holes were classified according to their likely use.

Terrestrial Invertebrates

- 2.23 An assessment was made of the site for the potential to support diverse communities of invertebrates, or any Biodiversity Action Plan (BAP) species. The assessment was made

based on the presence of a number of habitat features which may support important invertebrate communities such as:

- An abundance of deadwood;
- Presence of diverse plant communities;
- Presence of varied woodland structure and sunny woodland edge;
- Presence of ponds or watercourses; and
- Presence of free draining soil exposures.

- 2.24 During the initial survey, no attempt was made to identify invertebrate species and where habitats were identified capable of supporting important or rare species, further Phase II survey work may be necessary to assess the importance of the site.

Survey Constraints

- 2.25 Bats will often roost in places that are inaccessible to the surveyor, such as under tiles and within soffits. During the inspection due regard was paid to the noting of features that have the potential to support crevice dwelling species.
- 2.26 Bats are nomadic and invariably move between roost sites, therefore any bat survey will only provide a snapshot of how bats may be using a particular site at that time.
- 2.27 Due to the timing of the instruction to carry out the ecological assessment, it was not possible to complete two of the three required surveys within the month of August, as indicated within BCT Best Practice Guidelines (Collins, 2023), or with temporal spacing of 3 weeks between surveys. The two surveys completed in September were carried out during suitable climatic conditions for bat activity and the preceding weather had been conducive to bat activity. Further emergence surveys will be undertaken to generate appropriate data for European Protected Species Licensing purposes and to establish if other roost types which may have been missed earlier in the season are present. Mitigation for any impacts will be varied as necessary under the terms of any subsequently granted EPSL.

3. Survey Results and Evaluation

Designated Sites

- 3.1 The Site's closest Statutory Protected Wildlife Site is Gutch Common Site of Special Scientific Interest (SSSI), which is located 400m northeast of the boundary of the Site at its nearest point. As the proposed development will not result in any net increase in the number of residential dwellings, any direct or indirect impacts on nearby statutory designated sites resulting from the proposed development are not considered likely to be ecologically significant.

Site Overview: Broad Habitats and Features

- 3.2 Refer to **Appendix 3 & 5** which shows the existing and proposed site layout.
- 3.3 The Site comprises of the regularly maintained garden and the residential dwelling of Wincombe Lodge. A more detailed description of the building affected by development plans is included within the bat survey section below.
- 3.4 The garden at Wincombe Lodge comprises predominantly of short sward amenity grassland which is regularly mown (**Figures 1 and 2**). Planting within the garden largely comprises of a mixture of both native and non-native ornamental shrubby species surrounding the residential dwelling (**Figure 3**), and several small trees including Wisteria, Hazel (*Corylus avellana*), Ash (*Fraxinus excelsior*), Lilac (*Syringa* sp.) and Buddleia (*Buddleja davidii*) were noted. Cherry Laurel (*Prunus laurocerasus*) hedging and post and wire fence separates the garden from the adjoining areas of Lodge Wood which surround the property to the south and east (**Figure 4**). With the exception of the shrubby planting and small trees adjacent to the residential dwelling to the south and a small 7m x 9m area of Cherry Laurel thicket to the east, all existing habitats will be protected and retained following development.



Figure 1 – Garden to the south of Wincombe Lodge



Figure 2 – Regularly maintained short sward grassland viewed towards Lodge Wood



Figure 3 – Shrub planting to be removed south of the property



Figure 4 – Cherry Laurel hedge bordering Lodge Wood to south of property

Bat Survey

Pre-existing Records

- 3.5 Local bat records provided by Wiltshire and Swindon Biological Records Centre (WSBRC) show presence of Common Pipistrelle, Soprano Pipistrelle, Brown Long-eared bat (*Plecotus auritus*), Barbastelle (*Barbastella barbastellus*), Noctule (*Nyctalus noctula*), Leisler's bat (*Nyctalus leisleri*), Serotine (*Eptesicus serotinus*), Greater Horseshoe bat (*Rhinolophus ferrumequinum*), Lesser Horseshoe bat, Daubentons bat (*Myotis daubentonii*), Whiskered bat (*Myotis mystacinus*), Natterer's bat (*Myotis nattereri*) and Bechstein's bat (*Myotis bechsteinii*) within 2km of Wincombe Lodge. Of these species, only the Common & Soprano Pipistrelle and Brown Long-eared bat can be considered as being at all common. The other species range from local to rare.
- 3.6 A review of broad habitats nearby, indicates high quality bat foraging habitat locally in the form of mixed woodland, areas of grazing pasture and interlinking hedgerow networks.

European Protected Species Licences (EPSLs)

- 3.7 A search of the Government website Multi-Agency Geographic Information for the Countryside (MAGIC) revealed the presence of two granted EPSLs with respect to bats within 2km of Wincombe Lodge. The nearest of these is located approximately 1.4km northeast of the Site and concerns the destruction of a resting place of Soprano Pipistrelles. The other EPSL approximately 1.5km north of the Site concerns the destruction of a resting place for Common Pipistrelles. No further EPSLs with respect to other European Protected Species have been granted within 2km of the Site.

Ground Level Tree Inspection

- 3.8 A ground level tree inspection for bats was undertaken as part of the PEA. No trees with bat roost potential are located within the zone of influence of the proposals within the development boundary.

Daytime Inspection of Buildings on Site

- 3.9 A daytime inspection of Wincombe Lodge (external and internal areas) was undertaken during the PEA of the 15th August 2025.

Wincombe Lodge – external inspection

- 3.10 Wincombe Lodge is an approximately rectilinear stone and brick-built dwelling supporting a clay tiled roof and ridge (**Figures 5, 6 & 7**) with an area of bitumen sealed flat roof to the northwest (**Figure 8**). Two dormer windows are located within the southern roof aspect and a stone-built chimney is also located to the south. The property was not in residential use at the time of survey. A cavity wall is likely to be present in the later brick-built addition to the original stone cottage which has walls of solid stone construction.
- 3.11 Wincombe Lodge is in generally good exterior condition, although several potential bat access points which could not be investigated further were identified around the building. These were in areas of missing mortar below ridge tiles on the northwestern section of roof adjacent to the flat roofed area (**Figure 9**), below raised (**Figure 10**), naturally profiled and within gaps between tiles (**Figure 11**) on all roof aspects, around missing mortar on bonnet tiles (**Figure 12**), and around gaps between exterior masonry and soffits (**Figures 13 & 14**). These exterior gaps may offer potential bat access to squeeze gap/crevice roosting locations. Areas of lead flashing were tight to the surrounding roof structure and mortar around tile verges was intact and offered no potential access opportunities for bats.



Figure 5 – Southern aspect of Wincombe Lodge



Figure 6 – Western aspect of Wincombe Lodge



Figure 7 – Eastern aspect of the property



Figure 8 – Area of flat roof forming the northwest part of the property



Figure 9 – Gaps below northwestern-facing ridge & roof tiles viewed from flat roof



Figure 10 – Multiple raised roof tiles (southern aspect)

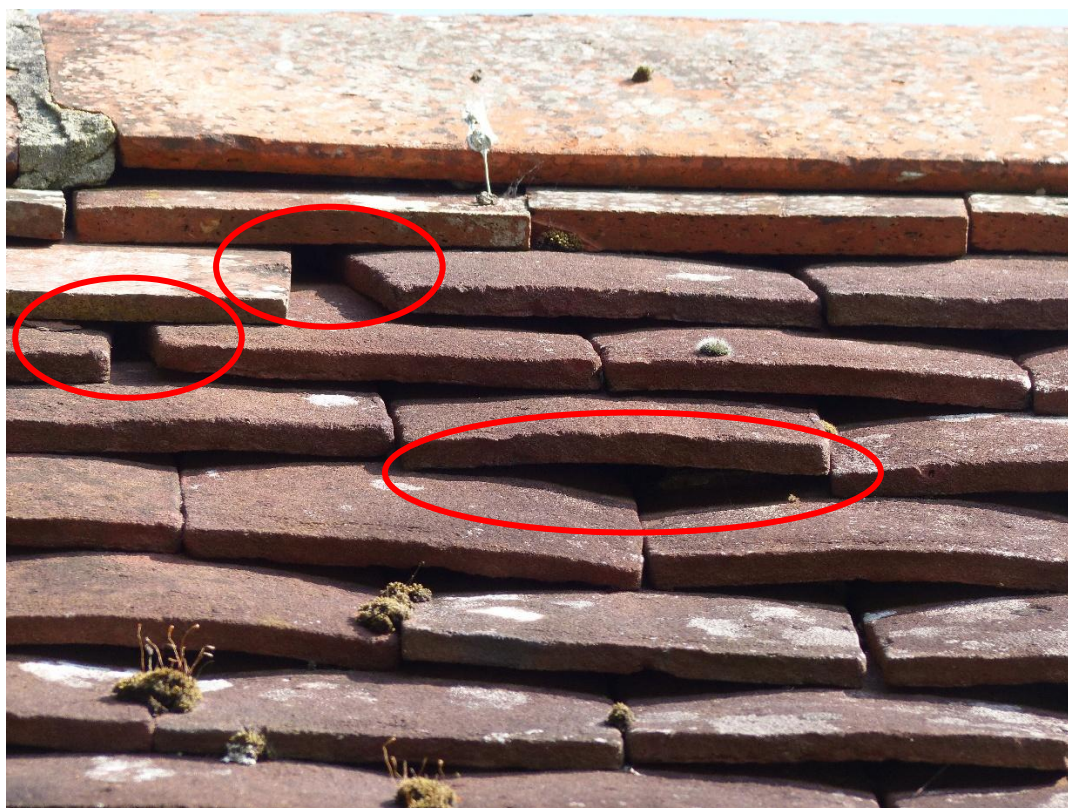


Figure 11 – Naturally profiled tiles and gaps between tiles, southern aspect



Figure 12 – Missing mortar around bonnet tiles



Figure 13 – Gap between soffits & exterior masonry (southern aspect)



Figure 14 – Gap around stonework on eastern gable

Wincombe Lodge – internal inspection

- 3.12 The property supports a shallow, untrussed, L-shaped loft void running the entire length of the main ridge. Access to the northward facing section (**Figure 15**) is via a single loft hatch located on the first floor and access to the east-west section (**Figure 16**) is via a wall hatch in the upstairs bathroom. The loft interior is un-boarded and obstructed by water tanks, allowing limited inspection access to the interior of the northward facing section only.
- 3.13 The internal void is insulated at floor level with glass fibre insulation. The internal dimensions measure approximately 24m (l) x 1.2m (h) x 2.0m (w). Abundant mouse and rat droppings were noted throughout the northern section loft space, along with a small number of fresh bat droppings on the loft hatch itself (**Figure 17**). The void was not used for domestic storage at the time of survey. Some cobwebbing is evident and the interior of the roof structure is lined with bitumastic type roofing felt. There was some visible light ingress from the northern facing gable and internal conditions were warm and still.



Figure 15 – Northern section of loft void viewed from access hatch



Figure 16 – East-west running loft void viewed from access



Figure 17 – Common Pipistrelle droppings on northern loft access hatch, with rat & mouse droppings visible on glass fibre insulation

- 3.14 The property was assessed according to BCT guidelines (Collins, 2023) as providing ‘high - confirmed’ bat roost suitability based on the presence of multiple suitable bat access points to potential crevice and void roosting sites. DNA analysis confirmed droppings collected within the loft originated from Common Pipistrelle bats (**Appendix 7**). The building is also located within high quality habitat, known to support a suite of bat species. Further Phase 2 emergence surveys have been carried out to establish bat species present and inform suitable mitigation prior to the proposed modifications to this building.

Phase 2 Bat Surveys

- 3.15 The emergence/re-entry surveys undertaken at Wincombe Lodge are summarised in **Table 3.1** below.

Table 3.1: Summarised results of the bat activity surveys carried out at Wincombe Lodge.

Survey Date	Bat Emergences/Re-entries	General Activity
22 nd August 2025 Dusk	Four Common Pipistrelles were observed and filmed emerging from the property from three roost sites. A single common pipistrelle emerged from roof tiles adjacent to the western dormer on the southern aspect of the roof at 20.23. A single Common Pipistrelle emerged from below a roof tile to the west of the southern section of roof at 20.25. Two Common pipistrelles emerged from below a ridge tile adjacent to the section of flat roof at 20:26 & 20.33.	Species recorded: Common Pipistrelle, Soprano Pipistrelle, Long-eared bat, Noctule, Lesser Horseshoe, Myotis sp. & Serotine. Activity: Moderate levels of bat activity were observed and recorded, principally from individual/low numbers of Common Pipistrelles throughout the survey. Bats were observed foraging and commuting around the building and nearby garden. Occasional passes were recorded from individual commuting and foraging Soprano Pipistrelles, a Long-eared bat, Noctules, A Lesser Horseshoe, a Myotis species and a Serotine.
4 th September 2025 Dusk	Two Common Pipistrelles were observed and filmed emerging from the property from two roost sites. One Common Pipistrelle emerged from below a roof tile close to the eaves on the southern aspect of the roof at 19:49. This bat re-entered the same roost at 20:44, before emerging again at 20:59. One Common pipistrelle emerged from below a roof tile close to the ridge on the southern aspect of the roof at 20:01.	Species recorded: Common Pipistrelle, Soprano Pipistrelle, Lesser Horseshoe, Noctule, Barbastelle, Long-eared bat, Myotis sp. & Serotine. Activity: Moderate levels of activity from individual Common Pipistrelle bats were recorded commuting/foraging around the building, surrounding garden and nearby woodland. Individual Soprano Pipistrelles and Noctules were also recorded. Single passes by individual commuting Barbastelle, Long-eared bat, Myotis sp. and Serotine were noted. Activity diminished during the second half of the survey.
18 th September 2025 Dusk	A single Common Pipistrelle was observed emerging from the northern gable at 19:24. A single Brandts bat was observed emerging from below a roof tile close to the southern ridge at 19:30 and a single Soprano Pipistrelle was observed emerging from below a roof tile near the ridge on the southern aspect at 19:34. A single Common Pipistrelle was observed entering below a roof tile close to the SE eaves at 20:16 before re-emerging at 20:32 and a single Common Pipistrelle was observed entering below a raised roof tile between the two southern dormer windows at 20:34.	Species Recorded: Common Pipistrelle, Soprano Pipistrelle, Brandt's bat., Barbastelle, Long-eared bat, Noctule & Serotine. Activity: Moderate levels of Common Pipistrelle foraging activity around the garden from low numbers of bats. Occasional passes also observed and recorded from individual Soprano Pipistrelle and Serotine during the survey commuting & foraging. A single pass from an individual Noctule, Barbastelle, Long-eared bat and a Myotis sp. were recorded during the survey.

Bat Survey Interpretation & Evaluation of Results

- 3.16 Two common pipistrelles were observed emerging from a ridge tile above the flat roofed section of the property during the survey of 22/08/25. Individual Common Pipistrelles were also observed and filmed emerging or re-entering another six different roosting locations around the building during surveys. A single Brandt's bat and Soprano Pipistrelle were observed and filmed emerging from below raised roof tiles on the southern aspect of the property, close to the ridge during the final survey. The locations of all roost sites identified during the surveys are shown in **Appendix 8**.
- 3.17 A European Protected Species Licence will be required to legally carry out the proposed works at Wincombe Lodge, as the proposals will impact areas of the building shown to support up to seven individual day roosts used by Common Pipistrelles, a single day roost used by an individual Brandt's bat and a single day roost used by an individual Soprano Pipistrelle, resulting in the destruction and permanent loss of these features.
- 3.18 An additional bat emergence survey(s) will be completed during the early summer (late May/early June) of 2026 to generate sufficient data to draft a European Protected Species Licence application to Natural England to legally carry out the proposals at Wincombe Lodge. The results of this survey will determine if additional bat species or roosting sites are present at the property which may have been missed earlier in the bat activity period and if levels of suggested mitigation are appropriate.

Reptiles

- 3.19 During the PEA, the habitats on site were assessed for their potential to support reptiles. In addition, the surrounding landscape and adjoining habitats were appraised for their potential to support reptiles in order to ascertain the likelihood of these species being present.
- 3.20 Given the nature and relatively small size of the development area surrounding the property, good existing access around the Site and an absence of the tussock grassland structure favoured by these species, there is limited potential to support the more common and widespread species of reptile such as Slow Worm (*Anguis fragilis*), Common Lizard (*Zootoca vivipara*) and Grass Snake (*Natrix helvetica*) within areas impacted by proposals. Accordingly, no further surveys for these species prior to development is considered proportionate or necessary.

Amphibians

- 3.21 A search of the Government website Multi-Agency Geographic Information for the Countryside (MAGIC) did not reveal the presence of ponds within 500m of the Site and there are no ponds at the property.

- 3.22 Limited opportunity exists for terrestrial life phases of amphibian species within areas to be impacted in the regularly maintained gardens at Wincombe Lodge. Boundary hedges may offer very limited habitat requirements. Given the nature and scale of the development, no further surveys for these species are considered necessary.

Hazel dormouse

- 3.23 Habitats within the zone of influence of the proposals (the construction zone and any potential working zone) are considered to be of limited quality for hazel dormice. Suitable hedgerows and vegetation on site are limited and lack connectivity to more suitable hedgerows and woodland within the wider local environment and consequently the proposed works are deemed very unlikely to impact on dormice (if present). Proposals indicate the removal of an isolated section of non-native shrubby planting immediately to the south of the property (**Figure 4**) and a small 7m x 9m section of Cherry Laurel thicket on the boundary of Lodge Wood to the east of Wincombe Lodge. Neither is considered likely to support Hazel Dormice and no breaches in habitat connectivity will result from proposals. Accordingly, no further surveys for this species are considered proportionate or necessary.

Nesting Birds

- 3.24 During the inspection of the building and surrounding garden within the development site, no evidence of birds' nests was observed. However, shrubby planting surrounding the residential property at Wincombe Lodge presents some limited opportunities for nesting birds. A small linear section of shrubby planting south of Wincombe Lodge (**Figure 4**) and a small area of Cherry Laurel thicket will be cleared during development to facilitate proposals.
- 3.25 Potentially suitable nesting habitat is also present within other hedgerows, shrubs and mature trees within the wider site environs. These will be protected and retained following development.

Other Protected and Notable Species

- 3.26 Given the size and scale of development proposals, it is considered unlikely that other protected and notable species would be impacted by works at the Site. No Badger (*Meles meles*) setts were noted during the survey, although given the rural location of the Site it is possible the species may commute and forage locally. The amenity garden at Wincombe Lodge may support other notable species such as Hedgehog (*Erinaceus europaeus*), which may commute through the Site to areas of more suitable habitat nearby. This species is of conservation priority and is listed under Section 41 of the NERC act. The proposed development would not be expected to directly impact any of these species.

4. Potential Impacts in the Absence of Mitigation

Introduction

- 4.1 This section details the potential ecological impacts of the proposal in the absence of mitigation. The potential activities are identified with reference to the scheme, as described in **Section 1**. Recommended mitigation and enhancements to ensure that the favourable conservation status of species on site is maintained, in compliance with the relevant legislation and planning policy, is detailed in **Section 5**.

Impacts to Sites & Habitats

- 4.2 Given the relatively small scale of the proposed development and as the proposed development will not result in a net increase in the number of residential dwellings, negligible direct post-development impacts to designated nature conservation sites are anticipated.
- 4.3 None of the habitats within the Site boundary are considered to be of intrinsic nature conservation value, apart from their potential to support protected species.

Impacts to Flora & Fauna

- 4.4 Works to renovate the building, including the construction of additional living space above the existing single storey flat roofed section of the property and re-roofing works have the potential to disturb, injure or kill bats if present during the time of works, resulting in a breach of the Habitats and Species Regulations 2017.
- 4.5 Proposals will result in the destruction of seven day roosting sites used by up to four Common Pipistrelles, a single day roost used by an individual Soprano Pipistrelle and a single day roost used by an individual Brandt's bat.
- 4.6 Any increase in incident light splay on boundary hedgerows and mature trees arising from the development may potentially impact on bat commuting and foraging routes to nearby areas.
- 4.7 The completion of these works may result in the potential loss of, or disturbance to nests of common and widespread bird species (if present) within shrubby vegetation surrounding the existing dwelling.
- 4.8 The removal of shrubby planting south of the property and a small amount of Cherry Laurel thicket adjoining Lodge Wood to facilitate the construction of a car parking space may result in the potential loss of, or disturbance to nests (if present) of common and widespread bird species within. Landscaping or building works undertaken during the nesting bird season may disturb or destroy bird nests, resulting in a contravention of Section 1 of the Wildlife and Countryside Act 1981 (as amended).

- 4.9 The clearance of small areas of vegetation with very limited potential to support common and 'widespread' reptiles or amphibian species could have a negative impact upon the favourable conservation status of these species (if present) due to the loss of suitable habitats and the potential to harm individual animals, which would cause an offence under the Wildlife and Countryside Act 1981 (as amended). However, it is considered very unlikely that common and widespread reptile species, or protected species of amphibian would be present within on-site habitats subject to disturbance.
- 4.10 It is considered unlikely that Hazel Dormice would be present on site, although surrounding woodland habitats do present some opportunities for the species. Any loss of vegetation would not be expected to impact the species (if present in the surrounding area).
- 4.11 Notwithstanding this, even if these species were present locally, it is not considered that the development would have any significant adverse impact upon them. This is due to the limited amount of vegetation that would be disturbed or lost as a result of proposals; its relative isolation from more suitable habitats; and the presence of more suitable terrestrial habitats for these species located further away from the development area (giving the likelihood that individual protected species will not be disturbed).
- 4.12 Failure to observe appropriate root protection areas around all retained mature trees and hedgerows on Site during construction works could result in damage to trees or hedges from root compaction, leading to a decline in general plant health.
- 4.13 Overall impacts on biodiversity as a whole may arise from the loss of, or damage to habitats available for a variety of species (if present), including birds, bats, reptiles, amphibians and invertebrates.

5. Requirements & Recommendations

Mitigation and Opportunities for Enhancement

- 5.1 In order for the proposals to comply fully with applicable legislation and planning policy, it is necessary to mitigate or compensate for the ecological impacts as identified in **Section 4**. The National Planning Policy Framework also places an onus on developments to provide ecological enhancements and to meet local biodiversity objectives wherever possible. Within this section mitigation measures are recommended to ensure that sensitive habitats and protected species are considered during the construction and operation phases of the development, in compliance with applicable legislation and planning policy.

Ecological Constraints

- 5.2 Appropriate root protection areas (RPAs) around all retained trees and hedgerows on Site must be observed during the construction process to avoid compaction of the ground by construction operations and any stored building materials. If necessary, RPAs will be cordoned off using appropriate barrier fencing to ensure vehicle movements and stored materials do not damage tree roots, leading to a decline in overall tree or hedgerow health.

Mitigation and Compensation Measures

Bats

- 5.3 All species of bat and their roosts are protected under the Habitats and Species Regulations 2017 (as amended). The Preliminary Ecological Appraisal identified potential roost access points at multiple locations around the building and the presence of Common Pipistrelle droppings within the accessible northern section of the loft void. Subsequent Phase 2 bat surveys confirmed the presence of seven day roosting sites used by Common Pipistrelles (see **Appendix 8** for locations), one day roosting site below a roof tile used by an individual Soprano Pipistrelle and one day roosting site below a roof tile used by an individual Brandt's bat.
- 5.4 A European Protected Species Licence will be necessary to legally carry out the proposed works at Wincombe Lodge.
- 5.5 Where possible, construction work will be timed to minimise the impact on bats. An ecologist will be on call during development operations in the event any bats are encountered.
- 5.6 Any destructive works involving removal of roofing materials, soffits and any other areas that have the potential to support bats will need to be directly supervised by a suitably qualified and licensed bat ecologist. All potentially sensitive areas of the building such as roofing, soffits, lead flashing and exterior masonry will be hand stripped, following a detailed toolbox

talk to all site personnel. The methodology for undertaking destructive works would be as detailed below, unless varied under the terms of any subsequently granted EPSL.

- 5.7 Prior to the start of works, temporary mitigation features in the form of three Schwegler 2FN bat boxes (or similar designs) will be installed on one of the several nearby suitable retained trees to provide alternative roosting opportunities for bats whilst the work is being carried out. These boxes are within an area used by commuting and foraging bats and will be left in position following completion of works to provide enhanced roosting opportunities for bats around the site.
- 5.8 The destructive works will be timed accordingly to avoid the sensitive times of year. To avoid potential disturbance to hibernating bats, no destructive works to the roof structure, soffits and masonry (bat sensitive areas) will be commenced during the hibernation season, which is generally considered to be from 1st November to 31st March (although this is dictated by weather conditions).
- 5.9 Suitable mitigation for the loss of the seven day roost sites used by up to four individual Common Pipistrelles and the day roosting sites used by an individual Soprano Pipistrelle and individual Brandt's bat would be the incorporation of five bat access tiles within the re-roofed property in the same aspects and similar locations to the existing roosts. Three would be incorporated on the southern aspect of the re-roofed property and two would be incorporated on the northern aspect. This level of mitigation is contingent on the existing stock of naturally profiled clay tiles being re-used. These tiles would recreate a number of new access points across the roof structure which would also be available to bats. However, should new close-fitting tiles be incorporated in the replacement roof structure, additional bat access tiles would be required to match the number of known roosts lost as a result of the development.
- 5.10 No breathable roof membrane (BRM) will be used to line the replacement roof incorporating bat mitigation, as this is proven to be damaging to bats. Only membranes which have been certified as having passed a snagging propensity test or F1-type bitumastic membrane can be used in these circumstances.
- 5.11 As bats are known to forage within the local area which is not currently subject to any significant levels of light pollution, any increase in lighting post-development must be avoided (Institute of Lighting Professionals, 2023; Lacoeylthe *et al.*, 2014). Any new external lighting must be directed to minimise light spillage on adjacent trees or hedgerows by the use of directional lighting hoods. All external lighting must be fitted with timing sensors to minimise the period of unnecessary illumination and reduce the potential for the lights to attract invertebrates. All on-site lighting must comply with the Guidance Notes on Bats and Artificial Lighting at Night (GN08:2023), as outlined by the Institution of Lighting Professionals (2023). Any luminaires or bollard lighting to be used must be designed to limit upward lighting to 0% above 90° to the horizontal plane. Lighting measures must ensure the following:

- Lights will not be aimed at boundary trees or vegetation;
- Lighting must not be aimed at potential roosting features associated with buildings, mature trees and hedgerows along the boundaries within the curtilage of the proposals;
- Light levels will be kept to below 1lux where possible;
- Light hoods will be used to reduce light spillage; and
- Timed / motion sensor security lighting will be used where external lighting is required.

Birds

- 5.12 It is an offence under the Wildlife and Countryside Act 1981 (as amended) to disturb nesting birds. To avoid contravention of protected species legislation, any building modifications or tree/shrub removal associated with the development must be scheduled to avoid peak bird nesting season (which runs from 1st March to 31st August, inclusive), unless inspection by an ecologist concludes that there are no nesting birds present immediately prior to the commencement of works. If the presence of nesting birds is confirmed, any works which may disturb them will be delayed until the young birds have fledged the nest of their own accord.
- 5.13 Given the nature of the proposed works, the impacts on birds are considered to be potentially 'limited' at the site scale.
- 5.14 The potential loss of bird nesting opportunities within the existing building and associated shrubby vegetation will be compensated for by installing new nesting features for a variety of species. These will be located within retained mature trees and shrubs within the garden. A Schwegler 1B nest box (or similar design) will be placed within a suitable tree along with an open-fronted 2H Schwegler (or similar design) nest box in an appropriately concealed location within a retained hedgerow in the rear garden at Wincombe Lodge.

Reptiles and Amphibians

- 5.15 The area to be impacted upon by the proposals has very low potential to support the more common and widespread species of reptile or amphibian. Further Phase 2 surveys for both species are not considered necessary, although a precautionary approach to any vegetation clearance should be employed.
- 5.16 In the very unlikely event that reptiles or amphibians are found during development, an ecologist should be contacted to advise on how to proceed or to carefully catch and move animals out of harm's way to more suitable retained habitat nearby within the wider ownership of the Client.

Enhancements - General Considerations

5.17 In addition to the mitigation and enhancements recommended for bats and birds described above, the creation of habitats can have benefits for biodiversity as a whole, in line with national and local planning policy. Recommendations for these within the wider ownership of the Client include:

- Additional planting of native, flowering and fruiting shrub and tree species as part of landscaping work; and
- Erection of a woodstone insect block (or similar design) on a suitable tree, fence or wall in a sunny position within the garden at Wincombe Lodge.

Residual Impacts

5.18 Provided the mitigation recommended above is implemented in full there should be no residual impacts to protected species and habitats as a result of the proposed development at Wincombe Lodge.

6. Conclusions and Recommendations

Conclusions

- 6.1 A Preliminary Ecological Appraisal and daytime inspection for bats has been undertaken at Wincombe Lodge following best practice guidelines (CIEEM, 2017. and Collins, 2023).
- 6.2 Within the Site boundary no habitats of any intrinsic nature conservation value were noted. However, habitats within the Site boundary have the potential to support protected species.
- 6.3 Wincombe Lodge has been shown to support seven day roosts used by up to four Common Pipistrelles, as well as day roosts used by individual Soprano Pipistrelles and Brandt's bat. Accordingly, a European Protected Species Licence granted by Natural England will be required to legally carry out the proposed works which will permanently destroy nine bat roosts.
- 6.4 Shrubby vegetation associated with the building and on-site trees are considered to have some potential to support nesting birds.
- 6.5 There is very limited potential for a small amount of habitat within the Site to support the more common and widespread species of reptile or amphibian. A precautionary approach to any necessary vegetation clearance is recommended.
- 6.6 Recommendations for mitigation and enhancement have been made and are listed below.

Recommendations

- 6.7 Mitigation and enhancement recommendations include:
- Implementation of a bat mitigation strategy for both licensable and non-licensable works to the building;
 - Clearance of shrubby vegetation associated with the property and the nearby track to the east should be completed outside of the nesting bird season or, if this is not possible, following an early morning bird survey and under the supervision of a suitably qualified and experienced ecologist;
 - Observance of appropriate root protection areas around all retained mature trees and hedgerows on site, using barrier fencing to protect these, where deemed necessary;
 - Planting of native, fruiting tree and hedgerow species as part of any new landscaping; and
 - The installation of bird, bat and insect boxes at suitable locations within the garden at Wincombe Lodge.

- 6.8 Provided the mitigation measures recommended above are implemented in full, there should be no residual impacts to ecological features as a result of this development.

7. References & Bibliography

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Appendix 1

Relevant Legislation

CONSERVATION OF HABITATS AND SPECIES REGULATIONS 2017

These **Regulations** consolidate the Conservation of **Habitats and Species Regulations** 2010 (S.I. 2010/490) with subsequent amending instruments. The Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations) transpose Habitats Directive into UK legislation. The Habitats Regulations provide for the designation and protection of European Sites and European Protected Species. European Sites include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs), which form part of the Natura 2000 network of protected areas across Europe.

European Protected Species (EPS) are those listed under Schedule 2 of the Habitats Regulations and include dormouse, great crested newt, otter and all species of bat. The regulations prohibit the deliberate capture, killing or disturbance of any EPS; it is also an offence to damage or destroy a breeding site or resting place of any of these species. In order to carry out a lawful operation (e.g. development work which has full planning permission) that may result in an offence under the Habitats Regulations, it is necessary to obtain a licence from Natural England. EPS Licences will only be granted after Natural England has been satisfied that there are no satisfactory alternative and that there will not be any adverse impacts on the favourable conservation status of the species.

WILDLIFE AND COUNTRYSIDE ACT 1981

The Wildlife and Countryside Act 1981 is the principle piece of legislative protection of wildlife in Great Britain. Various amendments have occurred since the original enactment. The Wildlife and Countryside Act contains both habitat and species protection. Certain bird, animal and plant species are afforded protection under Schedules 1, 5 and 8 of the Act. Measures for the protection of the countryside, National Parks, Sites of Special Scientific Interest (SSSIs) are also included within the Act.

COUNTRYSIDE AND RIGHTS OF WAY ACT 2000

The Countryside and Rights of Way (CROW) Act 2000 adds to the protection afforded in the WCA to SSSI's and other important sites for nature conservation. In addition, under the Act it became a criminal offence to "recklessly disturb" Schedule 1 nesting birds and species protected under Schedule 5 of the Wildlife and Countryside Act. It also enabled heavier penalties on the conviction of wildlife offences.

THE NATURAL ENVIRONMENT AND RURAL COMMUNITIES ACT 2006

The Natural Environment and Rural Communities (NERC) Act 2006 improved wildlife protection by amending the WCA. The main function of the NERC Act was to raise the profile of biodiversity amongst public authorities. Section 40 (S40) of the Act places a 'Biodiversity Duty' on all public bodies to have regard to the conservation of biodiversity when carrying out their normal functions.

PLANNING POLICY

NATIONAL LEVEL - THE NATIONAL PLANNING POLICY FRAMEWORK (NPPF, 2024)

The revised National Planning Policy Framework (2024) (available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf>) sets out the Government's planning policies for England and how these should be applied. Section 15 of the NPPF provides guidance on conserving and enhancing the natural environment through the planning system. This guidance replaces *Planning Policy Statement 9 (PPS9) Biodiversity and Geological Conservation*. Section 15, Paragraph 170, of the NPPF specifies that the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

In consideration of habitats and biodiversity, Paragraph 174 states plans should:

- Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Paragraph 175 states when determining planning applications, local planning authorities should apply the following principles:

- if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

GOVERNMENT CIRCULAR 06/05: BIODIVERSITY AND GEOLOGICAL CONSERVATION

The Government Circular 06/05 provides guidance on the application of the law relating to planning and nature conservation. It was originally produced to accompany PPS9, and although some of the information contained within it is now out of date, paragraphs 98 and 99 of the document remain relevant.

Paragraph 98 states that *“the presence of protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitats”*

Paragraph 99 states that *“it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted”*

REGIONAL PLANNING POLICY

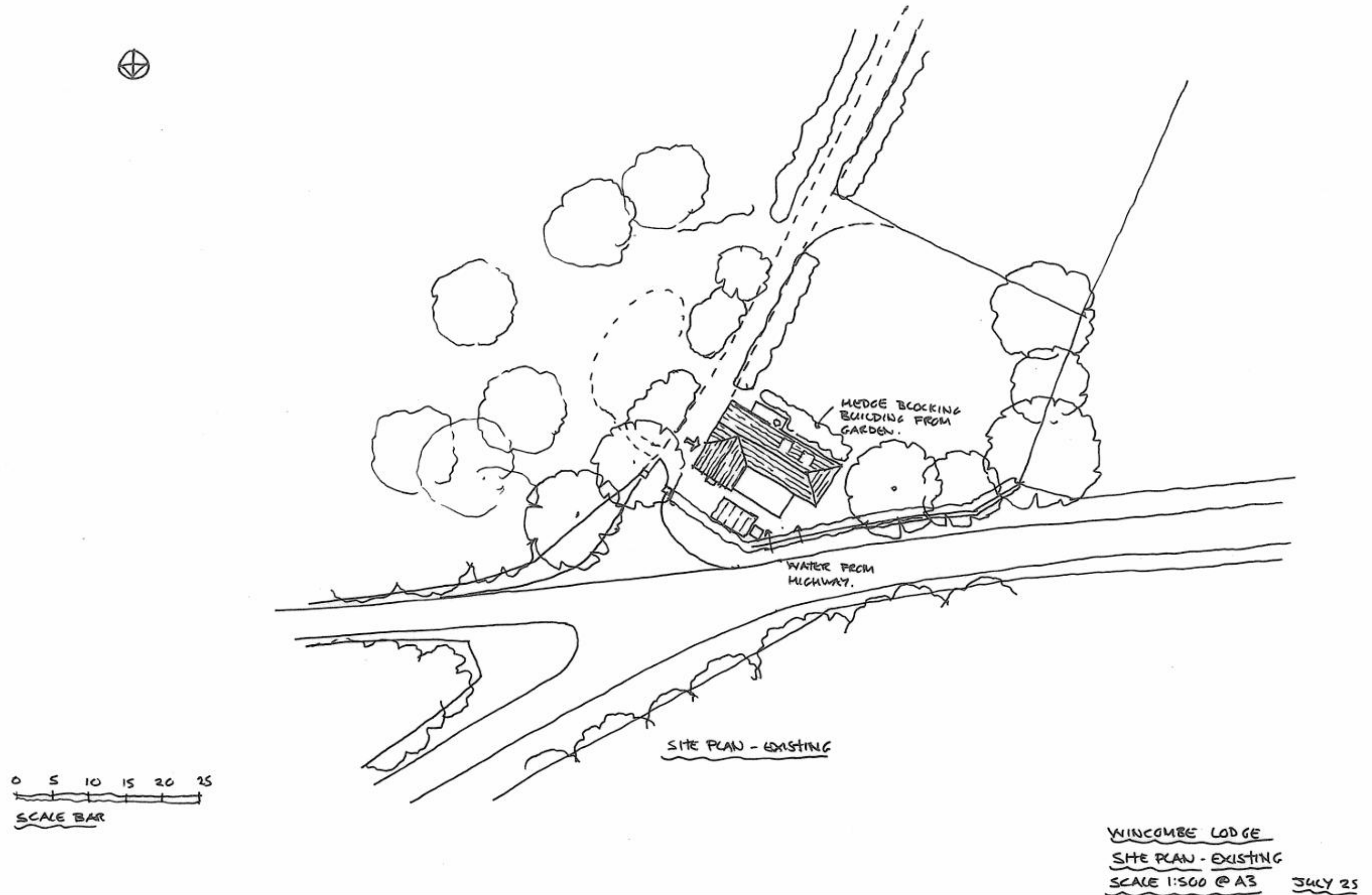
The Wiltshire Council Local Plan: Adopted January 2015, available online at: <https://www.wiltshire.gov.uk/planning-policy-core-strategy> sets out the long term spatial planning strategy for the region.

Appendix 2: Site Location (○)

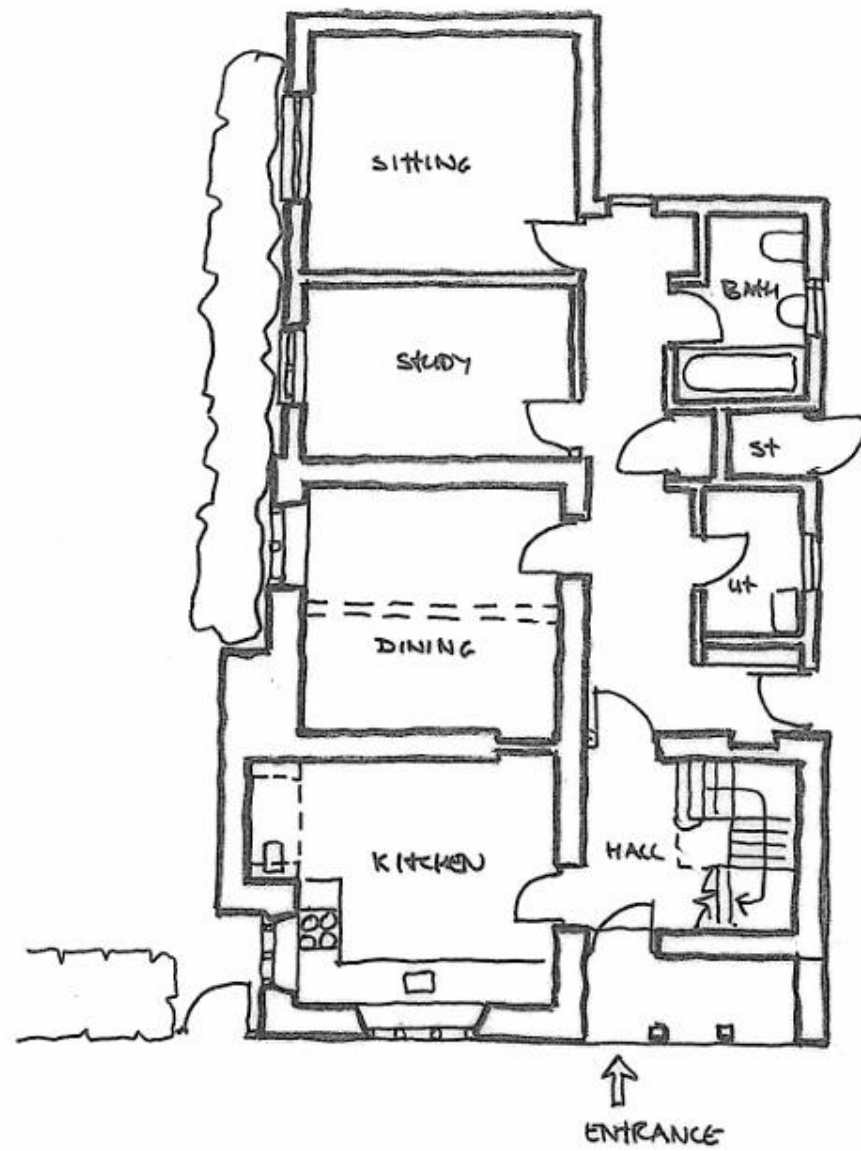


WINCOMBE LODGE, DONHEAD St MARY
PEA & Phase 2 Bat Survey

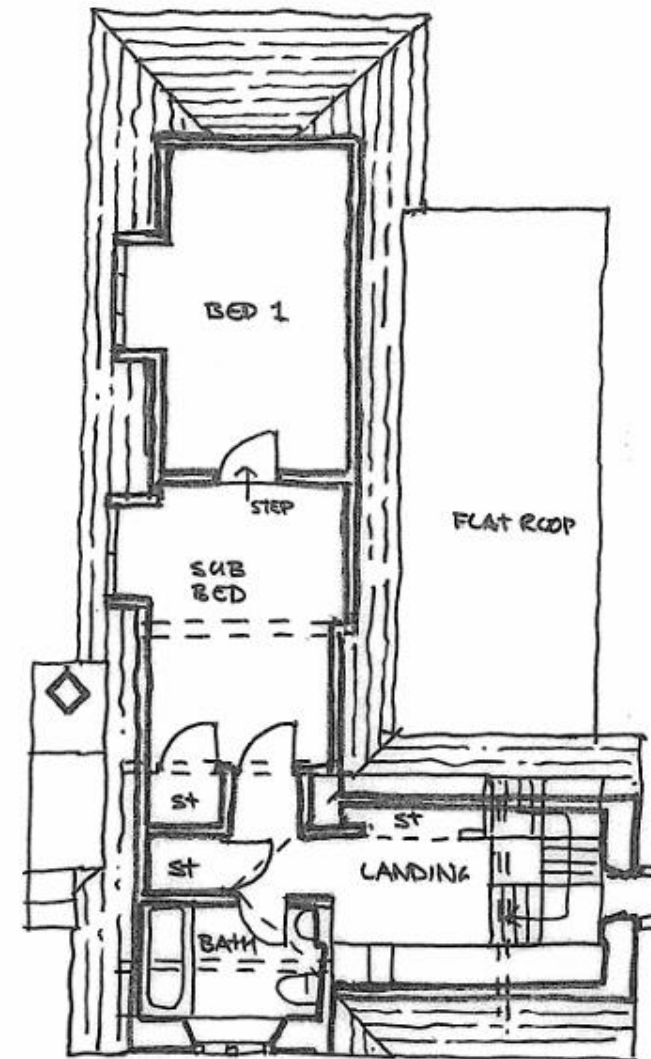
Appendix 3: Existing Site Layout



Appendix 4: Existing Building Layout



GROUND FLOOR PLAN



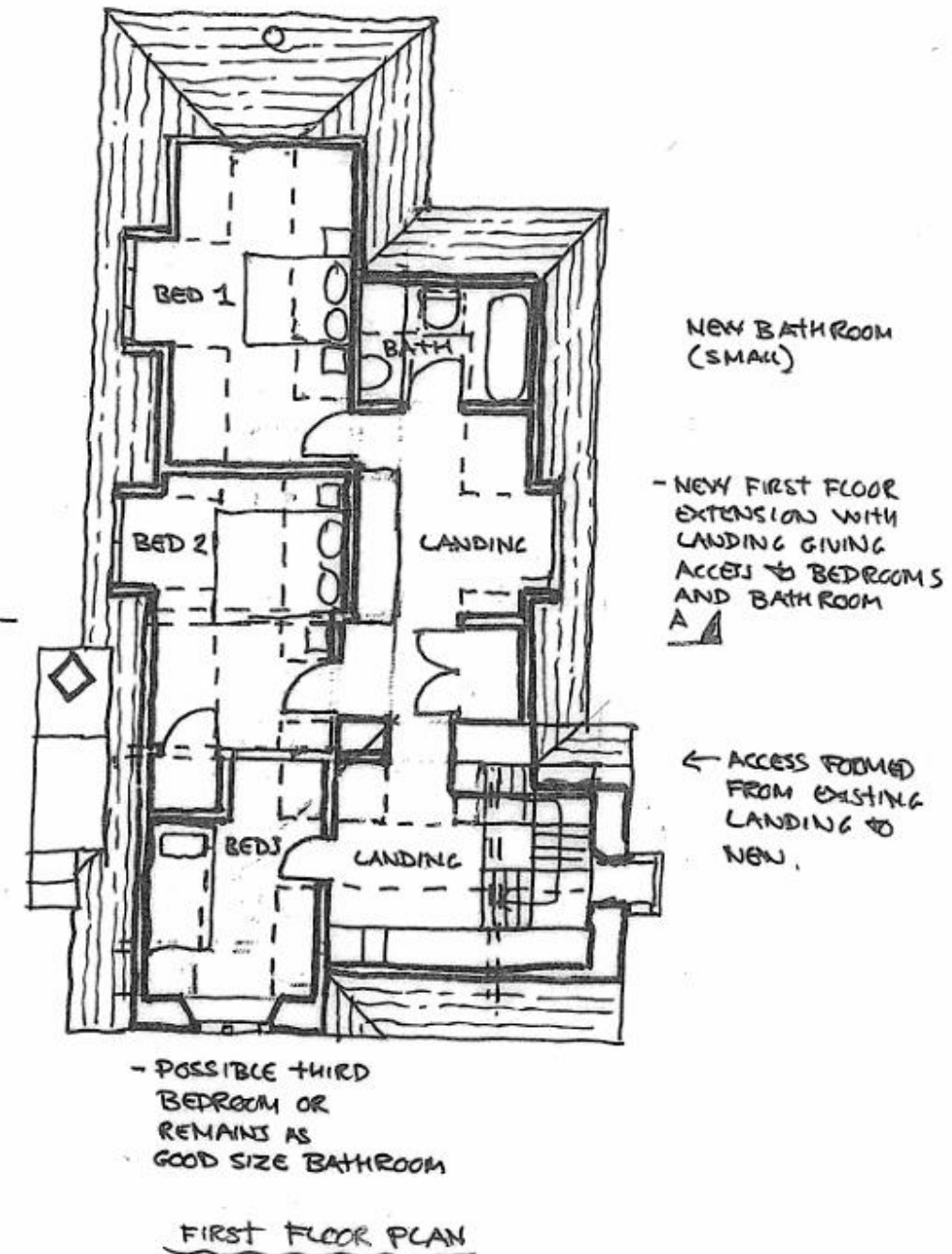
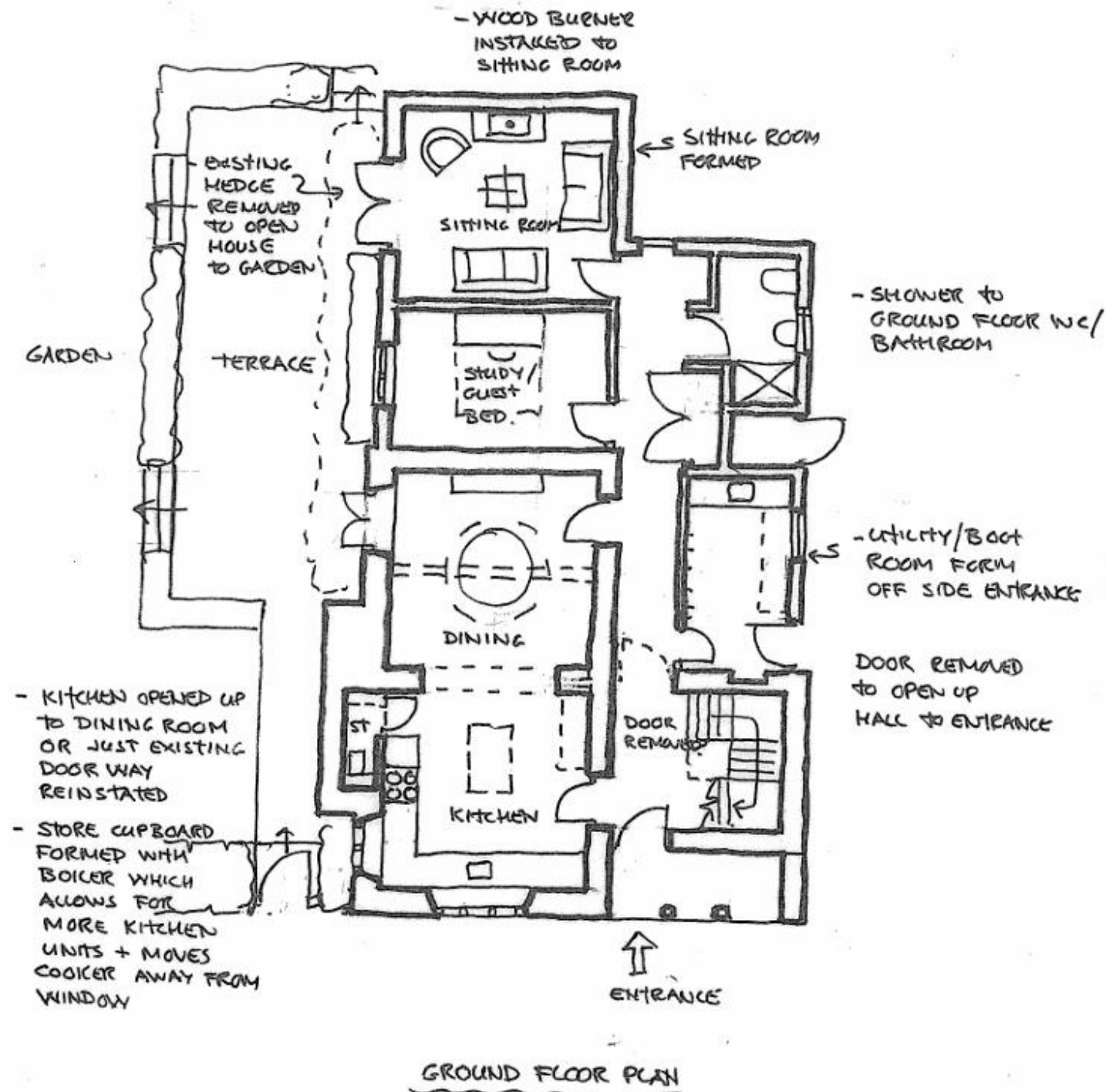
FIRST FLOOR PLAN

WINCOMBE LODGE
SKETCH FLOOR PLANS - EXISTING
SCALE 1:100 @ A3 JULY 25

Appendix 5: Proposed New Site Layout



Appendix 6: Proposed New Building Layout



WINCOMBE LODGE
 SKETCH FLOOR PLANS - OPTION A
 SCALE 1:100 @ A3 JULY 25

Appendix 7: DNA Analysis of Bat Droppings

Order Number: 3745



Samples submitted

Sample Code	Multi-species?	Sample Type	Date Sample Found	Species Group	Site postcode/ post town /grid ref	Site description / comments (Optional)	Suspected identity of species
SEL-3745-1	No	Faecal	15/08/2025	C. Bats	SP7 9AB	From loft void	

Analysis Results

Sample Code	DNA Extraction Code	Species Identified	ID Method	Ct value	% match
SEL-3745-1	EG-2025-1943	Pipistrellus pipistrellus (Common pipistrelle bat)	qPCR	22	

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Appendix 8: Bat Roost Locations at Wincombe Lodge



Key

Common Pipistrelle emergence point (2 bats) noted during the emergence survey on 22/08/25



Key

Common Pipistrelle emergence point noted during survey of 22/08/25

Common Pipistrelle emergence point noted during survey of 04/09/25

Common Pipistrelle re-entry point noted during survey of 18/09/25

Appendix 8 continued: Bat Roost Locations at Wincombe Lodge



Key



Common Pipistrelle emergence and re-entry point noted on surveys of 04/09/25 and 18/09/25



Soprano Pipistrelle emergence point noted during survey of 18/09/25



Brandt's bat emergence point noted during survey of 18/09/25



Key



Common pipistrelle emergence point noted during survey of 18/09/25