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Ms Palmer 0127.

### Habitat and Species Regulations.

There are three overriding principles in plan making as regards the Habitat and Species Regulations where a strategic plan or land-use plan is being considered.

- a) If it is likely to have a significant effect on a European Site the plan making authority or appropriate nature conservation body must, before the plan is given effect, make an Appropriate Assessment of the implications for the site in view of the sites conservation objectives. (Guidance for managing Natura 2000 sites Nov 2018)
- b) The presumption in favour of sustainable development does not apply where development requires appropriate assessment because of its potential impacts on priority habitat site's the footprint ecology. (NPPF19 para. 177)
- c) The principle of no scientific doubt should be applied in the absence of a demonstration of no adverse effects as in a European Court ruling in favour of this under European Law as article 6 paragraph 3 & 4 of the Habitats and Species Directive. Planning authorities have to consider three tests:

The development must be for overriding public interest or public health and safety

There are no satisfactory alternatives to the proposed development

The favourable conservation status of a European protected site must be maintained.

- d) The application of policies in this Framework (NPPF19 11 b)i) that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan.

## Nitrate Neutrality

Poole Harbour is a European priority habitat: SPA under the birds directive and is a Ramsar site, the Habitats and Species Regulations require its protection. There is an existing serious problem of nutrient enrichment particularly by nitrates already there. Visiting the area within the Purbeck planning district one sees widespread green algal blooms and there is an offensive smell, this is due to the algae reducing the oxygen levels in the mud and killing off the invertebrates which are the food for birds for which the SPA was designated e.g. Avocet, Black tailed Godwit, Spoonbill, Little Egret thereby reducing their numbers by destruction of feeding habitat. South West Hampshire District Council underpinning alerts in the Solent states they are driven by site-specific pressures. That means the increasing population of Wool will have a detrimental effect. Purbeck D.C. signed up in 2017 to a nitrogen reduction policy. There are 2 approaches to achieving nitrate neutrality:

- a) Offsetting, this relies on taking land out of agricultural production. How far has Purbeck got with this and how many farmers have signed up? Are there any working examples of success using this method? it is unlikely as Natural England's paper of 2013 admitted there is a time lag of 25 to 30 years. Grazing land produces between 12 and 15 kg nitrogen per ha per year, Urban land 14.3 kg per ha per year, conventional agricultural land up to 30 kg per ha per year, so housing generally may be itself reducing nitrogen production. But this is not the case for Wool as all the sites are organic farmland that produces little nitrogen on account of no artificial nitrate fertilisers being used. So Natural England's advice here that housing will reduce nitrate is incorrect.
- b) The other method for producing nitrate neutrality requires sewage treatment and nitrate stripping facilities. Wessex water treatment works are required to remove 75% of nitrates but with an increasing population nitrate stripping will also be required. This process is expensive and Wool does not qualify on population size grounds according to Natural England. The papers assessing pollution problems dismissed those of Wool as minor(SHLAA15). Wool sewage works is operating at near to full capacity and the pipe work infrastructure is inadequate resulting in raw sewage flowing into people's gardens and untreated water entering the Frome. There is no room for expansion of Wool treatment works as two thirds of the land around the existing treatment works is either road or more importantly SSSI.

Severe deterioration in the S PA / Ramsar priority habitat is happening now. Any time lag in nitrate reduction means the situation will continue to worsen. The nitrate neutrality policy is based on hope with no clear evidence. The "Grampian Principle" if applied would require the absolute certainty of proving that nitrate neutrality could be achieved as mitigation before developing sites. Further deterioration of this habitat could be taken to the European Court as having disregard to the Habits Regulations.

## SANG

Dorset Heaths European Habitats – SPA, SCA and RAMSAR registered. These priority habitats are under reg 61, Given the highest level of protection. Increased people pressure is recognised as having a negative impact on these sites which are present in and around Wool Parish and the Species they protect e.g. NIGHTJAR and WOODLARK. The PURBECK CORE STRATEGY – IMPLICATIONS of ADDITIONAL GROWTH SCENARIOS for European Protected Sites P.C.S.I. A.G.G.S.E.P.S. states that additional growth at Wool is likely to give a very marked rise in access to Winfrith Heath. There are concerns of Residents of Wool using this for Dog Walking etc. To mitigate this SANGS (Sites of Alternative Natural Greenspace) are essential P272. The report suggests 1000 houses could produce 200 new dog owning households (but many will have more than one dog.)

SANGS are designed specifically as a prime objective for dog walkers and as stated in East Dorset Local Plan review they should provide plenty of space for dogs to exercise freely off lead. Other criteria listed here are that visitors feel safe, easy access to car parks, sufficiently attractive to draw people in to use it, in preference to the Heathland. In another document by Footprint Ecology in Appendix 2 there are listed as “must haves” various essentials, and if anyone is missing the site will be unlikely to qualify as a SANG. So why has Coombe Wood been selected:

- a) It is NOT free from UNPLEASANT OLFACTORY INTRUSION. The slurry pit at Winfrith Newburgh farm (450 meters away) to the West with prevailing westerly winds frequently produces a highly unpleasant smell in the wood. Removing conifers as suggested in management will exacerbate this.
- b) Historically Local People have frequently said it has a bad feel about it. This is partly because of its enclosed feeling and actually I contradict Mr Liley and Co – it does not have open vistas. Woodlands because of their enclosed nature are not infrequently used for suicide. Nature wardens ~~there~~ not infrequently have to deal with this situation and even *incidents* such as ~~these~~ or rape or molesting will have a seriously deterrent effect on the use of the SANG.
- c) I believe the SANG at Wool is one where visitors from further afield are not expected – more of a drop in place for daily use by children and youths from the Development; BUT if the narrow access lane is to be used by car access widening might be essential but there is a designated wildlife verge on the eastern side.
- d) There is a suggestion that dogs will be expected to be kept on lead during the bird nesting season and there may be notification restricting big dog exercise to the area on the field near the ancient monument. The success of such notices has been consistently unsuccessful on Winfrith Heath and Studland the P.C.SIAGSEPS 2.45 Indicates that notices to this effect are currently ineffective. Dog walkers may be put off or view the latter exclusion as discriminatory.

e) However the strongest case against Coombe Wood as a SANG is that it is Ancient Woodland. The NPPF 2019 par 175 c states clearly that development resulting in the loss or deterioration of irreplaceable habitats such as Ancient Woodland or Ancient or Veteran Trees should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. All voiced in the Woodland Trust objection to Coombe Wood acting as a SANG.

It is not even just Ancient Woodland it hosts several Bat Species including the VERY RARE BARBASTELLE and GREY LONG EARED BAT, DERC has many e.g. 90 records from 1998-2006 of Dormice. There are GREAT CRESTED NEWTS in one pond and breeding FIRECRESTS are all priority species Schedule II PCSIAGSE etc. Lilley, Hoskin and Co state Nightjars are recorded from all the large commercial forestry blocks around Wool. The 3/4rds PAWS Plantation on Ancient Woodland site in Coombe Wood almost certainly hosts Nightjars which have been heard in this area and seen flying around the ancient monument field part of the SANG – Woodlarks are recorded for Coombe Wood. So here we are mitigating against people and dogs damaging SAC and B.A.P. sites with a highly rich species Ancient Wood that is actually used by the very protected species for which the Heathland SPA has been created! Using the area for feeding and displaying.

Woodland present the most stable and biodiverse habitats 3/4rds of our breeding birds 1/2 of our butterflies and moths 1/3 of our flowering plants – Most of our British mammals are associated with Woodland if not exclusively. They act as reservoirs of Retreat where species can escape the damaging pressures of population increase and Urbanization. How much more so is this for Ancient Woodland where woodland has been present for at least 400 years. It provides sites for U.K.'s most important e.g. Priority species – threatened Flora and Fauna, Lichens are extremely exacting in their requirements. A Lichen survey has not been carried out but Lichens of the Revised Index of Ecological Continuity have already been recorded on a Veteran Oak.

Ancient Woodland and SANGS are not compatible. There is a conflict here at the outset. I have made a Table of Conflicts of requirements between SANGS, Priority Species and Ancient Woodland.

<b>SANG</b>	<b>Priority Species</b>	<b>Ancient Woodland</b>
Power to draw people in, needs a range of access points.	Those will have to avoid potential Bat roosts in trees many of which are on the boundaries of the wood	Extra designed or opportunistic ways into the wood – footfall potential to destroy woodland ground flora: complete set of ancient woodland indicator species in Coombe Wood.
Dog Walking: owners calling for lost dogs, barking	Dormice are particularly sensitive to noise as are bats. Disturbance in dormancy period may lead to their breaking dormancy in winter and losing their energy reserves – fat needed for them to survive through winter.	Noise is not compatible with the peaceful atmosphere of ancient woods.
Dog fouling bags provided in places like Fingle Woods Devon may be dropped or hung on trees.	Possible ingestion of plastic, restricted movement if caught in bottles, broken glass.	Enrichment of soil leading to loss of specialist ancient wood flora
Dropped food and litter	Chance to area layouts can affect commuting paths for bats – potential bat roosts could be removed. Dormice do not like hollowed out woodland, prefer scrub and brambles found on the path edges. 50+ trees identified with med to high level bat roost potential.	Damaging or destroying trees, compacting soils around tree roots
Safety issues – must be perceived safe. Widening paths, achieving an open aspect by tree, scrub or branch removal	Priority species may be disturbed by chainsaws, negative effects on bats and dormice (Woodland Trust carrying out monitoring on this to get certainty about hollow trees used)	Loss of trees opening up the wood with more light affects Lichens.
Heightened safety tests for trees in windy episodes, more frequent with climate change. Windblow more likely if wood is opened up, old hollow trees may be removed	Encourages rats	Soil enrichment – negative impact on ground flora.
Fly tipping could occur – Dumped fish in 8 Acre Coppice LNR. Already garden waste dumped at the entrance of Coombe Wood	Changed to humidity and temperature affects bats	Changing humidity and possibly the hydrology will remove some lichens – particularly any of the Lobarion community. Lower mycological richness. May preclude natural tree regeneration
Paths should be suitable for all weathers. This is a very damp wood drainage may be needed although opening up by tree removal will affect humidity and temperature	Negative impact particularly on light sensitive bats on site (Greater Horseshoe, arbastelle & Grey	Reduced naturalness
May require some lighting around the car parks and the edge of the wood in the dark or dusk.		

<p>Could lead to visits by torchlight Management to maintain SANG</p>	<p>Long Eared Bat - v. Rare) Disturbance – bats, dormice and Gt Crested Newts <i>Redwood were by woodlands in Nyllyons</i></p>	<p>Minimum management – possible non intervention, some hazel coppicing may be advantageous/ Removal of conifers could: 1) encourage wind blow 2) open up to increased smells (Slurry pit) 3) reduce or remove breeding Firecrests 4) reduce biodiversity eg Discourage Siskin, Goldcrests</p>
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Do Natural England still maintain that the use of Coombe Wood as a SANG is desirable and there are no constraints? How do they intend to increase biodiversity here as the Government is requiring attention to this in parallel with development – the biodiversity audit will start with an appreciable negative balance if ancient woodland is used as a SANG or the Organic Fields as building sites. What actual mitigation measures are foreseen to offset the damage to this Ancient Wood.

The production of a viable sustainable SANG in Wool is essential to the mitigation of Dorset European heathland. This can only be achieved by intensive mitigation measures that must have guaranteed long term sustainability. Who will carry it out and who will pay? (In a paper from the Scott estate they estimate it costing £1000 to £1500 per house )

## Priority species.

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Not surprisingly Wool's outstanding biodiversity audit is topped with an impressive list of priority European species schedule 2 of the Habitats and Species Regulations there are 20 such species including various species of bats, some very rare, although sand lizards and smooth snakes are restricted to the heathlands outside the parish development area.

These animals all have legal part 3 protection against disturbance paragraph 20 NPPF 19 this means:

- a. to impair their ability to:
  - 1. survive breed or reproduce or nurture their young or
  - 2. in the case of hibernating or migratory species to hibernate or migrate or
- b. to significantly affect the local distribution or abundance of the species to which they belong.

None of these animals is mentioned, except the Salmon which is not a scheduled 2 species, in Purbeck DC's assessment and its amendments. Obviously EU threatened habitats have much wider implications but they have been designated to protect both species and habitats.

The list includes 13 species of Bats: Greater Horseshoe, Barbastelle, Grey Long Eared, Brown Long Eared, Pipistrelle, Soprano Pipistrelle, Noctule, Serotine, Myotis spp. Leislers, Nathusius Pipistrelle, Nyctolus sp.

Can Natural England give an assurance that these species will be properly mitigated for before house building or infrastructure construction proceeds that are likely to create illegal disturbance and that five years on there will be no losses or declines in abundance caused by Wool's development?

There are three particularly rare species: Barbastelle is recorded for three of the proposed development sites and two parts of the SANG - the historic monument field and Coombe Wood. The Grey Long Eared bat has a similar distribution. Leisler's bat was recorded from three of the development sites. There are 56 trees with moderately high bat roost potential recorded from Coombe Wood and one field where the development area has a number of trees with a moderate to high bat roost suitability.

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Although no actual bat roosts were recorded in the EAD bat detector surveys, on the main exit from Coombe Wood at dusk a survey recorded various large size bats leaving and these could well use the hollow ancient trees in Coombe Wood as roosts e.g. species such as the Noctule and Pipistrelle.

Bats are among the world's most sensitive nocturnal mammals, they have declined by 98% in the last century and 50% over the last two years. The main causes for the decline is loss of roosts, loss of food with decline of feeding habitats, pollution( smoke & car fumes ), light pollution and historically timber treatment.

The development sites have extensive hedgerows and surveys show that they are insect rich, with 300 to 400 different species of insects recorded from them of which 17 are nationally rare or notable and some 44 different moths were recorded on three evenings in early August around the development fields. Moths use the hedgerows for shelter and food sites for larvae and bats hunt along such hedges. One Pipistrelle may eat over 3500 insects each night. The removal of these insect rich fields for housing is inevitably going to cause a decline in abundance of bat populations also- threatening their ability to survive, breed or rear and nurture young so totally contravening the European protection laws.

Bats normally have only a single young in a year and not always every year. Populations will struggle, therefore, to recover if they are knocked back by food deprivation or loss of places for sheltered warm maternity roosts. They need connectivity of habitats between roosting and feeding areas. Survey of the linear layout of the development fields from the South at Coombe Wood with its likely roosts to the North adjoining the watermeadows provides a natural corridor for flight paths and bat surveys have indicated use of all fields by different species of bats so removal of these will again result in a decline in abundance and the loss of flight paths again will contravene EU protection for priority species.

Bats are very sensitive to pollution including smoke, car fumes and lighting. Bats are particularly sensitive to light pollution. Increased lighting in the whole development area will also be a barrier to flight paths. Light up time at dusk is the peak time for bat activity and peak time for feeding and they will lose peak insect feeding opportunities. Slow flying broad-winged bats (eg the Grey Long Eared Bat) are strongly averse to white or green light, red light may be less harmful. The Bat Conservation Trust who have investigated switch off time effects state that there are no such thing as bat friendly lights. Where lights attract moths bats may be more vulnerable to predators if they hunt there. Dr. Kerslake Vice President of the Chartered Institute of Ecology states even when



councils adopt policies of dimmed or turned off lighting at critical times for bats as a condition of development this is not always enforced post development.

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Increased traffic due to increased housing will increase car exhaust pollution and noise again having a detrimental effect on bats. Bats are certainly very high on the casualty list if this development in Wool goes ahead. Any remaining hope of a nearby corridor will be squeezed between expansion of Dorset Innovation Park to the West and the proposed housing to the East. This all illustrates the complexity of mitigation measures. The Dorset bat groups statement that accurate and fully understood mitigation is essential if it is to counteract losses. Certainly other light free corridors from Coombe Wood likely roost site (as shown by frequent emergence of bats at dusk) in the northern northerly direction of the development sites are not available this will become even less possible if development spreads to other fields.

## GREAT CRESTED NEWTS

E.A.D. states there is a small transitory population of Great Crested Newts to the west of the Police Headquarters. This is the site at Solitaire on Frome Avenue. There are other reports – the Water cress Beds off the Lulworth Road and a pond in Coombe Wood. The pond at Solitaire has shown observational D.E.R.C. sightings since 2006, recorded on National Databases which have increased; 98 in 2007 2 in 2006, counts made weekly by standard 15 minute, but a growing population. This does not suggest a transitory population, Professor Griffiths of Kent University supplied a worksheet to enable assessment of the Pond and surrounding area H.S.I. – Habitat Suitability and this provided a record of 0.84, exceeding 0.8 – a value deemed excellent for the species. The size of the population is assessed as medium but this can only be established once Mr Sheppard has obtained a licence after a training course. The Gov.uk document on Great Crested Newts clearly states that mitigation for this species must include ENHANCEMENT of their HABITAT. In this instance far from enhancement the development with a sports pitch and housing at 200m would degrade the habitat, where organic fields formerly provided the terrestrial element of the habitat, to a point far from not being able to breed or survive disturbance would disseminate this population. It is outrageous that the developer dismissed Scientific Evidence from one of Wool Flora and Fauna's team with an Hons' degree in 2002 and a rigorous approach to his responsibilities over the years.

Notes exist  
in situ of  
Habitat

## DORMICE

These occur in Coombe Wood. Over Several years 1998-2006 at one time 90 individuals have been recorded and many nests have been sited. These are shown on D.E.R.C records, that E.A.D. did not find any evidence does not mean they were not there and a population like this is unlikely to have disappeared. They present a very mobile population with large home ranges – 35k so could have been missed / or at the time the population could have decreased due to forestry management to which Dormice are particularly vulnerable and susceptible to noise disturbance. Whilst extinct from larger areas of the country Dorset is a county where records are widespread.

They require connected areas of bushes and trees for foraging and summer nests. These will be particularly susceptible to dogs off lead disturbance. Mitigation measurers are needed and these require extensive surveys and take several months.

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## OTTERS

Populations are increasing Nationally but this is not observed on Wool. Last record in 2016 at Woolbridge. The likely causes are increased pressures from dog walking along the river meadows noticed since population increase in Wool e.g. Purbeck Gate. Fish have declined according to anglers and the retired Water Bailiff so making the river less of a feeding area and this decline will continue if the Plan for Wool goes ahead.

Sewage pollution with episodes of flooding having occurred with the last overflow episode this year and the pumping station full to capacity now – Increases in sewage pollution increase with rising population. If necessary works are carried out this could disturb their usual routes through the Parish, cause disruption to resting places frequented by Otters and cause declines in further stretches of the Frome beyond Wool. Otter activity varies according to season so several surveys throughout the year may be needed. Did EAD carry out such surveys?

## CONCLUSION

There are at least 30 Priority Species of European importance in the Wool Parish under the Habitat and Species Directive. This includes birds in the Bird Habitat Species Directive, other UK Priority Species exist in numbers but for the purpose of keeping to the HR they can be discounted.

Most of these will require some form of Mitigation because of the Direct or Indirect pressures presented by the Development in Wool. With the 2 important Habitats – Heathland and Poole Harbour, this amounts to widespread mitigation. Mitigation is not a quick fix solution. Invariably TIME is involved. It could involve in-depth surveys to identify exact locations or time for trees and hedges to grow and obtaining licences from Natural England.

Mitigation has to be appropriate for the different species e.g. in the case of Bats, Nathusius' Pipistrelle only flies short distances so nearby locations of food sources are essential. Greater Horseshoe Bats and some large bats are particularly Light Sensitive.

Mitigation can be costly and usually requires monitoring.

Mitigation must be Sustainable.

No mitigation measures have been outlined or assessed for deliverability for Species in the Amendments to the Local Plan as produced by Mr Liley.

It states that certainty for the site mitigation can be effectively secured at plan level by giving an understanding of the availability of viable mitigation WITHOUT THE LEVEL OF DETAIL that is better developed at the PROJECT LEVEL. But surely the SOUNDNESS of MITIGATION is essential before the Plan is Adopted or else how can the Principle beyond ALL SCIENTIFIC DOUBT be applied or indeed any of the suggested principles – including the Grampian Principle be applied, Mitigation must be proved to work. Mr Liley's case study in Germany is interesting but what if the ruling on the Bridge had been different, would a whole plan flounder? If Mitigation cannot be EVIDENCED to provide the principle of NO SCIENTIFIC DOUBT what level of soundness can be achieved at Plan Stage?

So far as the assessment is concerned all is put off till the future and as far as actual mitigation measures have been mentioned at the inquiry so far they are SIMPLISTIC and TIME HAMPERED, as for planting more fields for the 400 Beetles and 17 rare and Nationally Notable ones or could even be labelled a scurrilous as regards the serious enquiry regarding provision of the element of suitable terrestrial elements of the Great Crested Newt population lost at SOLITARE i.e. they should walk up to the SANG 1 mile away across the busy A352!

Is there a level of Mitigation Measures above which a plan becomes unsound?

Natural England Paper EIN004 BIODIVERSITY queried offset (as a measure of Mitigation) could simply become a LICENCE TO TRASH.

We believe this is what could happen if the OUTSTANDING ENVIRONMENT OF WOOL, even at the top most levels of biodiversity as expressed with Species and Habitats Regulations is placed on the shelf for later attention; after the plan has been accepted thereby preventing scrutiny by the Inspector or Transparency for the General Public. Our considered opinion is that the plan is Environmentally unsound – certainly as regards Wool's SANG and Poole Harbour – Propped up by DOUBTFUL MITIGATION (of the Species Habitat Directive) for which as yet there is no scientific Evidence. The latest assessment of Wool as having POCKETS of BIODIVERSITY will become REALITY – very small FRAGMENTED POCKETS AT THAT.

10<sup>th</sup> October 2019

Dear Sir or Madam,

**Re: Proposed development at East Burton Road, SY 8364 8675**

Froglife are writing to object to the proposed development at grid reference SY 8364 8675 adjacent to East Burton Road, Wool, Dorset.

The garden at SY8364 8675 supports a significant breeding population of great crested newts. This species is protected under the UK Wildlife and Countryside Act 1981 and the European Habitats Regulations 1994. It is an offence to damage this species or its resting habitats and suitable mitigation needs to be put in place for this species should development take place. Although there has been identified a potential Suitable Alternative Green Space (SANG) 1 km to the south, this is in general too far for great crested newts to move and is across the main A352, which the newts would be unlikely to cross. Although some individuals can move this far, in reality the newts will only move up to a few hundred metres from their breeding pond. Therefore, it is unlikely that great crested newts will utilise this green space. Fifty metres to the north of the breeding ponds is Frome Water Meadows; however this is on the opposite side of the main Weymouth to Waterloo Railway line and busy East Burton Road. Therefore the great crested newts are unlikely to utilise this habitat. There are some small gardens to the south of the breeding pond, but these are unlikely to be large enough and provide enough terrestrial habitat to support this population of great crested newt. Also, the proposed green space would be subject to increased recreational footfall and disturbance, a sports pitch and a sports pavilion, all replacing current organic pasture and fodder crop. The current green space which is proposed for development is likely to provide resting areas for great crested newts as well as a corridor to alternative terrestrial habitats. Therefore this proposed development is likely to negatively impact on the available terrestrial habitat for this species and further isolate this population.

Froglife therefore strongly suggest that this development plan should not commence but if it does, to incorporate mitigation for great crested newts such as provision of an additional

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breeding pond to the south of the railway and East Burton Road, corridors of suitable terrestrial habitat and also green spaces which contains natural shrubs, trees and long grass. This will provide suitable terrestrial habitats for them to forage and take refuge.

If needed, Froglife can provide advice on such measures.

Yours sincerely,



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