

The Three Daggers, Edington

Preliminary Ecological Appraisal

June 2025



Notice

This document and its contents have been prepared and are intended solely as information for Three Daggers Operating Ltd (The Client) for use in relation to a planning application at The Three Daggers, Edington.

Providence Ecological Ltd assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its contents. No liability is accepted for any costs claims or losses arising from the use of this document, or any part thereof, for any purpose other than that which it has specifically been prepared or for use by any party other than The Client.

The information which Providence Ecological Ltd has provided has been prepared by an environmental specialist in accordance with the Code of Professional Conduct of the Chartered Institute of Ecology and Environmental Management (CIEEM). Providence Ecological Ltd confirms that the opinions expressed are our true and professional opinions.

This document does not purport to provide legal advice.

This document has 17 pages including the front and rear covers.

Document history

Revision	Purpose description	Authored	Reviewed	Issue Date
1.0	Ecological Impact Assessment Report	IL	AS	23/06/2025

Contents

1	INTRODUCTIONS	1
1.1	Terms of Reference	1
1.2	The Site	1
1.3	The Proposed Scheme	1
1.4	Scope of the Assessment	1
1.5	Aims and Objectives	2
2	METHODS	3
2.1	Desk Study	3
2.2	Field Surveys	3
3	BASELINE RESULTS	4
3.1	Desk Study	4
3.2	Habitats	4
3.3	Bats	5
3.4	Nesting Birds	6
3.5	Reptiles/Amphibians	6
3.6	Other	6
4	POTENTIAL EFFECTS AND AVOIDANCE/MITIGATION/COMPENSATION	7
4.1	Roosting Bats	8
4.2	General Mitigation Recommendations	8
5	ENHANCEMENTS	10
6	FURTHER SURVEYS	10
6.1	Bat Presence / Likely Absence Surveys	10
7	CONCLUSION	10

1 Introductions

1.1 Terms of Reference

1. Providence Ecological Ltd, was commissioned by Three Daggers Operating Ltd to undertake a Preliminary Ecological Appraisal (PEA) and provide a PEA report in connection with a proposed works at The Three Daggers, Edington (hereafter referred to as the Site) in relation to a planning application.
2. This report has been undertaken with reference to current good practice guidance¹²³⁴ and provides an assessment of potential effects of the works on identified designated sites, species and habitats of conservation significance and other features of ecological interest.

1.2 The Site

3. The Site is located within the village of Edington, Wiltshire at Ordnance Survey national grid reference ST 93174 53291 and comprises of modified grassland, native hedgerows, mature trees, tall ruderal vegetation, bramble scrub and artificial unsealed surfaces with structures. As well as scattered play equipment, ornamental scrub, fencing and public foot paths.
4. The northern boundary is not physically defined and is a continuation of modified grassland. The southern boundary is defined by Westbury road. The western boundary comprises of a native hedgerow with mature trees and a post and wire fence. The eastern boundary is defined by wooden fencing, bramble and a public footpath.
5. Adjacent habitats off site include further modified grassland, native hedgerows, as well as residential buildings and gardens, local roads and footpaths. The wider surrounds are generally a continuation of the adjacent habitats.

1.3 The Proposed Scheme

6. The Proposed Scheme (drawing "Proposed site plan; Drawing 2476-25-02") includes the creation of vehicular access, reinforced grass parking, multi user games area, new hedgerows, standard trees as well as fencing, gates and a new brick wall.
7. The Proposed Scheme (drawing "Farm Shop As Proposed; Drawing 2476-25-04") includes the creation of a café extension to northern elevation of The Three Daggers Farm Shop as well as a new wood fire oven flue adjacent to the structure's western elevation.
8. The proposals includes the loss of improved/modified grassland, a hazel hedgerow, scrub and fencing.

1.4 Scope of the Assessment

9. This report presents ecological information obtained during the following:
 - A PEA of the affected areas on 28/02/2025;
 - a desk-based study undertaken on 22/05/2025
10. Where any ecological feature (such as species or habitat of conservation significance or designated site) has not been mentioned, this is due to being screened out from the assessment at the initial stage and is not considered subject to any effect by the proposals and associated works.

1.4.1 Surveyor Competencies

11. The surveys were led by Natural England bat licenced surveyor Alex Sams (NE level 2 licence number 2017-27861-CLS-CLS) who has over 12 years of experience within ecological consultancy and has been assessed to be at least of capable experience following the Chartered Institute of Ecology and Environmental Management (CIEEM) competency framework⁵.

¹ Butcher, Carey, Edmonds, Norton and Treweek (2020) *The UK Habitat Classification User Manual Version 1.1*. UKHab Ltd

² CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal*. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.

³ CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.2*. Chartered Institute of Ecology and Environmental Management, Winchester.

⁴ Collins (2016) *Bat Surveys for Professional Ecologist: Good Practice Guidelines (3rd ed)*. The Bat Conservation Trust, London.

⁵ <https://www.cieem.net/competency-framework>

1.5 Aims and Objectives

12. The field survey aimed to detail the habitats present on Site, identify and characterise the potential use of the Site by any protected or notable species and/or the presence of any habitats of conservation significance within areas affected by the proposed works.
13. Where possible, the report identifies the need for, and details measures to avoid or mitigate damage and disturbance to habitats and species to inform the client and any agent acting on their behalf of their obligations, as well as to provide sufficient information for the LPA to write planning conditions as necessary.
14. Where required, the report details the need for further survey requirements to further inform the potential effects of the Proposed Scheme, mitigation recommendations and ultimately the detailed design of the development.
15. The recommendations have been provided in line with the mitigation hierarchy as detailed by NPPF paragraph 175 (a)⁶.

⁶ National Planning Policy Framework paragraph 175 (a): *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.*

2 Methods

2.1 Desk Study

16. The geographical area for obtaining ecological data through desk studies has been determined using best practice guidance (see Section 1.1 footnotes) and professional judgement. Baseline data has been gathered from the MAGIC website which included data gathering in relation to statutory designated sites, protected and priority habitats as well granted European Protected Species Licences (EPSL) (where available). The study areas used for the data gathering are detailed in Table 1 below. The desk study was undertaken on 22nd May 2025.

Table 1 – Desk study search areas

Data Type	Search area – distance from Proposed Scheme boundary
Statutory designated sites	1km (4km for bat SAC)
Granted European Protected Species Licences	1km
Non-statutory designated sites	500m
Priority habitats and species (incl. Ancient Woodland & veteran trees)	500m

2.2 Field Surveys

17. The geographical area for undertaking ecological field surveys has been determined using the current survey guidance (see Section 1.1 footnotes), professional judgement and the Ecological Zone of Influence (EZol), which have been determined based on likely effects arising from the Proposed Scheme.

2.2.1 Preliminary Ecological Appraisal

18. A PEA was undertaken on 28th February 2025, following best practice guidance for UKHab survey¹, Preliminary Bat Roost Appraisal⁴ and Preliminary Ecological Appraisal². The survey recorded information on the habitats within the red line boundary (RLB) and any surrounding land up to 50m from the RLB (where legally and safely accessible).
19. A PEA results plan is shown in Appendix A. Photographs taken during the ecological survey are provided alongside the relevant text.

3 Baseline Results

3.1 Desk Study

3.1.1 Statutory / Non-statutory Designated Sites

20. Bratton Downs SSSI is situated approximately 70m south of the site. It is designated for Lowland calcareous grassland and mixed deciduous woodland supporting a population of nationally scarce butterfly species, Duke of Burgundy and Adonis Blue. As well as a population of RDB moth; Scarce Forester and nationally notable moth species; Cistus Forester and Forester moth. The habitats on Site do not include these habitats and are sub-optimal for these species.
21. The Site is within a Site of Special Scientific Interest (SSSI) Impact Risk Zone but does not trigger the need for the LPA to consult with Natural England on the potential effects of the development on any associated protected site. The Bratton Downs SSSI is therefore not considered further in this report.

3.1.2 Priority Habitats and Ancient Woodland

22. The Salisbury Plain, Cranborne Chase & Pewsey Downs Important Plant Area is located within 75m south of the site. Designated for its abundance of plant species linked to ancient woodland and its significance for lichens in southern England.
23. Numerous areas of Broadleaved Woodland Habitat of Principal Importance (HPI) are present within 500m of the Site alongside areas of Lowland Calcareous Grassland and Lowland Meadows present to the south of the Site.
24. An ancient common yew tree is present within 500m but is not within the zone of influence of the proposed works.

3.1.3 Species Data Record

25. One granted European Protected Species licence applications were present within 1km of the Site:

Table 2 – EPS Licences within 1km of the site

Type of Licence	Licence Reference	Species covered	Species effected	1km grid ref point
EPS Mitigation Licence	2014-1103-EPS-MIT	Brown long-eared	Brown long-eared	ST93105320

3.2 Habitats

26. The site consisted predominantly of two modified grasslands; the northern field (hereafter referend to as Field 1) and the southern field (hereafter referred to as Field 2) as well as two commercial structures with predominantly hardstanding and gravel surrounds. A public footpath with post and wire fencing and trees divides Field 1 and Field 2. Tree species included beech, silver birch, field maple, wild cherry, horse chestnut, ash and common lime.

3.2.1 Modified Grassland (UK Hab G3)

3.2.1.1 Field 1

27. The grassland sward included no thatch and was less than 10cm in height throughout. Species diversity was low (<3 species / m2) and predominantly comprised perennial rye-grass, fescue sp., creeping buttercup, cock's-foot with occasional cow parsley and rough chervil at fences and boundaries. Tall ruderal species including frequent common nettle were present along the western edge.
28. A native hedgerow with mature beech trees was immediately adjacent to the western boundary with abundant bramble and ivy as well as common plant species such as frequent common nettle, cock's-foot and lords-&-ladies. This hedgerow continued through to the road to the south. The southern field boundary featured a post and wire fence with native trees and a public foot path.

3.2.1.2 Field 2

29. The grassland sward included no thatch and was less than 10cm in height throughout. Species diversity was low (<3 species / m2) and comprised common plant species such as lesser celandine, greater plantain, dandelion agg., common daisy, dead nettle and ribwort plantain. An area of hard standing is situated to the west and scattered play equipment in the south east.

30. The southern boundary consists of a mixture of hazel hedge, fencing, pedestrian access, and a beech hedgerow. The eastern boundary comprised a bramble dominated strip of scrub. The north east corner comprised modified grassland with a pedestrian access to Field 1, a tarmac access strip to Field 2, and short sections of “leggy” and/or defunct hedgerow with occasional ornamental planting.



Figure 1: Aerial view of most of the Site

3.2.2 Structure

31. The Three Daggers farm Shop is an L-shaped structure situated to the Southwest of the site and is of brick and timber construction with pitched and hipped slate tile roofing. A wooden decking adjoins the western elevation and a tall and narrow planted hazel hedge runs immediately parallel to the structure's northern elevation. Surrounding habitats included hard standing (u1b – developed land, sealed surface), ornamental scrub, amenity use modified grassland.

3.2.3 Adjacent Habitats (off site)

32. Modified grassland was situated to the west of the Site. North of the Site was a continuation of the modified grassland in Field 1. Habitat located north also included tall ruderal vegetation, bramble, holly, common ash, beech, fencing and a garden with both wood stone and rubble piles. Habitat to the east comprised of a public foot path, residential gardens and improved grassland, with a small pond located approximately 20m from the eastern boundary.
33. The further surrounds comprised predominantly of residential buildings and gardens, roads, foot paths, arable land, scrub, modified grassland, deciduous woodland and lowland calcareous grassland.

3.3 Bats

34. Bat roosting features were identified on the western gable end and eastern and northern elevations; these consisted of gaps between overlapping timber boards and gaps between the fascia boards and the timber

boards (Figure 2 & 3). These features were considered to be of high suitability for crevice-dwelling bats only as no roof void was present.

35.

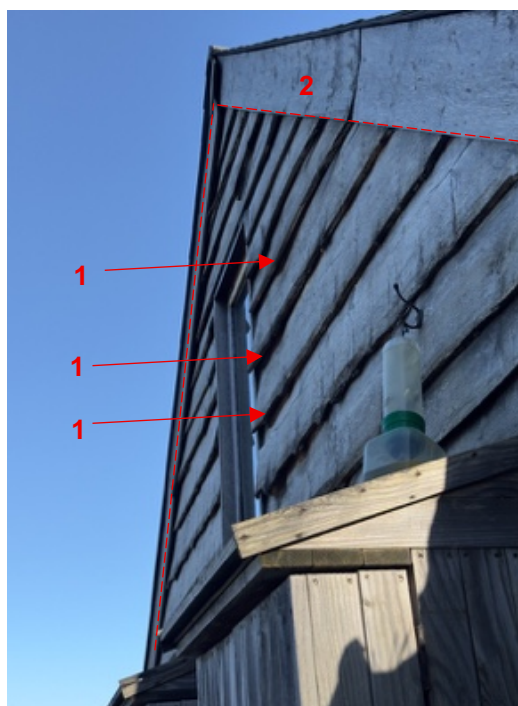


Figure 2 - The Farm Shops western elevation (1= gaps between the timber boards, 2= gap between the fascia and timber wall)



Figure 3 - The Farm Shops Northern elevation

36. Trees within the western boundary were not observed to have roosting features present but may have these at heights where surveyors were not able to view.
37. The western hedgerow and trees are considered to be of moderate suitability to support commuting bats and low suitability to support foraging bats. The habitats on Site are likely to support a negligible to low invertebrate prey assemblage.

3.4 Nesting Birds

38. The Three Daggers Farm Stall, hedgerows and trees have suitability to support nesting birds.

3.5 Reptiles/Amphibians

39. The Site itself is unlikely to support any reptiles or amphibians. However, habitats off site such as gardens and the pond has suitability to support reptiles and amphibians.

3.6 Other

40. The Site is likely to have various species moving through the Site such as fox, badger and deer. Species of Principal Importance (SPI) such as hedgehog, are also likely to move across the Site, however, no suitable shelter was identified on Site for this species. No other notable or protected species are considered likely to utilise the Site. The hedgerows forming the Site boundaries or those immediately adjacent to the Site boundaries may support dormice but are not to be affected by the works. The tall and narrow hazel hedge is unlikely to be of value to dormice but may support nesting birds.

4 Potential Effects and Avoidance/Mitigation/Compensation

	Baseline Feature	Associated Species/Habitat	Potential Effect	Phase of Development	Duration of Effect	Avoidance / Prevention	Mitigation	Compensation	Predicted Effects
SSSI	Bratton downs SSSI	Broadleaved, mixed and yew woodland.	No effect	n/a	n/a	n/a	n/a	n/a	None
Habitat	Modified Grassland	n/a	Minor loss of habitat of no conservation significance	Demolition/ clearance	Permanent	n/a	n/a	Compensation via enhancement of retained grassland	None
	Hazel hedgerow	Birds	Loss	Demolition / clearance	Permanent	n/a	n/a	Creation of new native hedgerow	Negligible short term
	Native Hedgerow w/ Mature Trees	Mature trees; Bats; Birds; Dormice	Root compaction; Accidental damage	Demolition/ clearance; Construction;	Temporary	Hedgerows and trees will be protected with root protection areas in line with BS 5837:2012	n/a	n/a	None
	Mature trees	Bats; Birds; Dormice	Root compaction; Accidental damage	Demolition/ clearance; Construction;	Temporary	See habitat avoidance / prevention above	n/a	n/a	
Species	Bat Foraging	Mature trees; Native hedgerow with trees;	Disturbance from artificial lighting	Demolition/ clearance; Construction; Operation	Temporary	During clearance and construction, no external lighting will be used between sunset and sunrise.	The new extension will include crevice dwelling bat roost features including additional roosts within the southern , western and eastern aspects of the Farm Stall.		None
	Bat Commuting								
	Bat Roosting	Timber Structure (The Three Daggers Farm Shop); Mature trees	Disturbance; Roost damage / loss; Roost obstruction		Temporary; Long-term	Demolition/ clearance & Construction: During clearance and construction, no external lighting to be used between sunset and sunrise. Operational phase: Any new external artificial lighting will be directional, at a low intensity and set to PIR with timers to avoid effects on bats. The new wood fire oven flue will be at least away from the structure west elevation to avoid blocking access to any potential roosts			Potential short term effects on roosting bats; No long term effects predicted
	Birds	Native hedgerow with trees; Scrub	Accidental damage	Demolition/ clearance; Construction	Temporary	See habitat avoidance / prevention above	n/a	n/a	None
	Dormice	Native hedgerow with trees; Scrub	Accidental damage	Demolition/ clearance; Construction	Temporary	See habitat avoidance / prevention above	n/a	n/a	None

4.1 Roosting Bats

41. **In the absence of mitigation**, the proposed works could potentially disturb, kill and/or injure any bats present at the time of demolition works and/or the damage and destruction of crevice dwelling bat roosts.
42. This loss would have an adverse effect of unknown level or scale and could constitute an offence under current legislation.

4.1.1 Mitigation

43. Precautionary mitigation method during dismantling/stripping (**due to potential suitability & in the instance that a roost is located**)
 - a. A group of three crevice dwelling bat boxes will be installed on mature trees at the western hedgerow (<100m) prior to the commencement of any works and will be implemented in line with best practice as set out in the CIEEM Bat mitigation Guidelines⁸. These will act as a receptor should any crevice dwelling bat species be found during the works.
 - b. Following the erection of tree bat roost boxes and a check of existing features by the ecologist named on the licence (or an accredited agent), dismantling would be completed by hand, with all materials associated with any roosting locations and those extending to within a 3m radius to be fully checked for any current presence of bats.
 - c. Tree mounted boxes would be left in-situ in perpetuity as an enhancement to the scheme.
44. Mitigation during occupation
 - a. External lighting will only be included where necessary for safety and access to mitigate any potential effects on bats.
 - b. All new external lighting will be downward facing, directional and low intensity to prevent direct or reflected light spill. Lighting will be set to PIR movement sensors with the sensitivity set low to be triggered by humans rather than any passing wildlife. It will be set to only come on for 30 seconds or less.

4.1.2 Compensation / Enhancement

45. New crevice roosting provision will be provided on the western, eastern and northern elevations of the structure. These will comprise crevices between external timber cladding and either internal timber or internal bitumen lined sections with 5cm x 2cm gaps between external boards included for access. These will measure approximately 50cm x 50cm areas, large enough area to provide roosting opportunities to multiple species and roost types. Additionally, single integrated bat boxes will also be included within the northern, western and eastern elevations. These will create slightly varying internal environments throughout the year. Dimensions will reflect the crevices measurements of the existing fascia boards wherever possible.
46. This will include a total of:
 - a. three roosts (including one box) on the western elevation;
 - b. two roosts (including one box) on the eastern elevation; and
 - c. three roosts (including two hibernation boxes) on the northern elevation.
47. Further surveys are to be undertaken to characterise any existing roosts, if present. This will further inform the nature of the roosting provision only in the context of whether it forms a mitigation or enhancement measure.
48. If further surveys reveal the presence of bat roosts, there may be no way to avoid the above effects from occurring under the proposed works, and as such, a licence would be required to derogate from an offence being caused. A full EPS licence (Natural England Licence A12) may be required to enable the works.
49. The licence would allow activities which would otherwise be an offence under current legislation and would be applied for under "imperative reasons of overriding public interest" (IROPI).

4.2 General Mitigation Recommendations

⁸ Reason, P.F. and Wray, S (2023). Uk Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for development affecting bats. Version 1.1, CIEEM and Environmental management, Ampfield.

50. Storage areas should be kept tidy and free from hazards, and any excavations should be covered, or a means of escape should be provided to prevent animals from entering them and becoming trapped or drowned; and
51. If any protected species or evidence of legally protected species, or any invasive non-native plant species, are unexpectedly encountered at any point during the works, all works should cease, and an ecologist should be contacted for further advice on how to proceed.

5 Enhancements

52. Proposed habitats such as hedgerows and wildflower-rich grasslands will enhance the Site for foraging and commuting bats as well as foraging and nesting birds.
53. The installation of tree-mounted bat boxes will provide an enhancement to roosting bats. The creation of new roosts within the Three Daggers Farm Shop would provide a significant enhancement (in the absence of existing bat roosts).

6 Further Surveys

6.1 Bat Presence / Likely Absence Surveys

54. Due to the overall high bat roosting suitability of The Three Daggers Farm Shop, three bat emergence surveys will be carried out in line with Bat Conservation trust guidance to inform the potential effects on bats. These will be led by a Natural England bat licenced surveyor who has been assessed to be at least of capable experience following the Chartered Institute of Ecology and Environmental Management (CIEEM) competency framework.
55. The surveys will be completed by two surveyors each equipped with bat detectors (Wildlife Acoustics Echometer Touch 2 Pro) as well as Night Visual Aids (NVAs) (Nightfox Whisker Infra-red (IR) video recording devices). Recordings will be reviewed post-survey as necessary.
56. The bat emergence surveys will begin at least 15 minutes prior to sunset and continue until at least 1.5 hours after sunset.

7 Conclusion

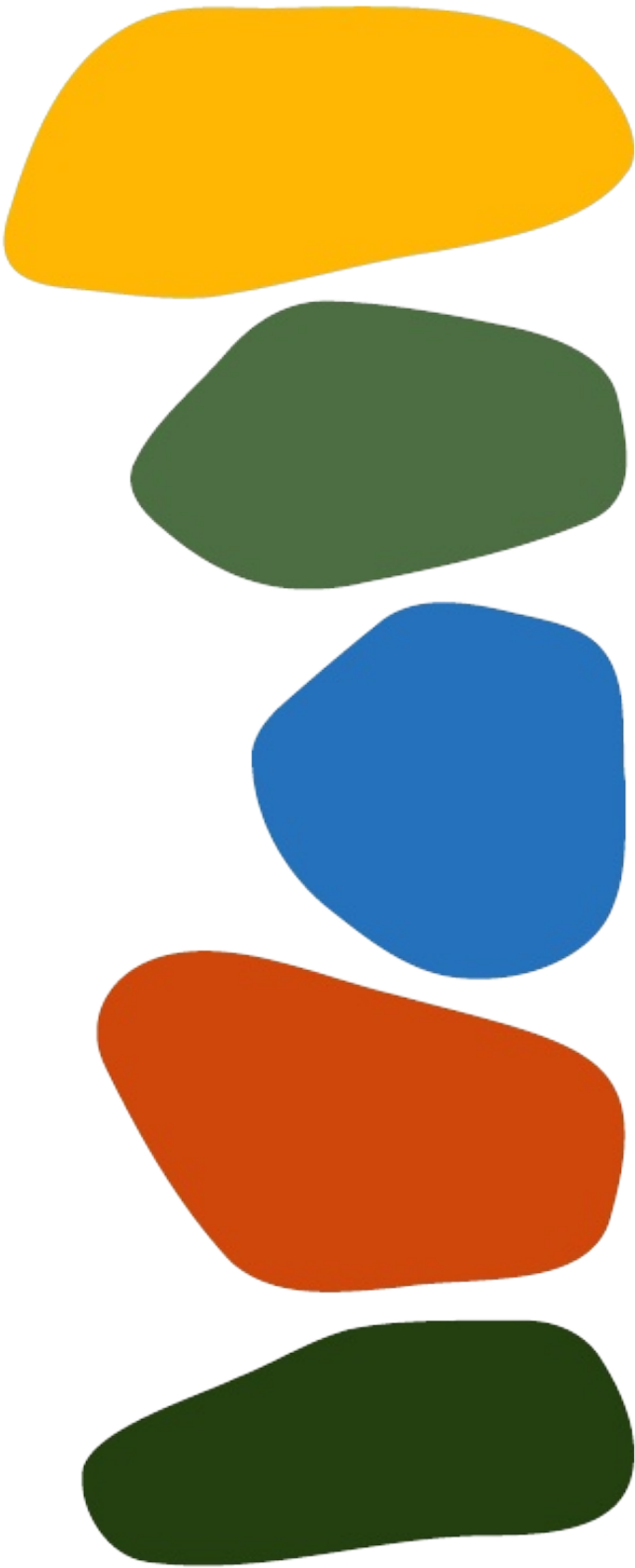
57. The Proposed Scheme predominantly includes the physical loss of improved/modified grassland of negligible conservation significance and loss of bramble scrub of low conservation significance and will create a significant length of native hedgerow as well as the enhancement of modified grassland through an increase of wildflowers.
58. The Proposed Scheme includes sufficient natural habitat to be considered an enhancement in and of itself.
59. Recommendations to avoid negative effects have been provided. It is likely that, should the avoidance recommendations be adopted/incorporated, no significant long-term effects are likely to result from the Proposed Scheme.
60. The Site is likely to experience **an increase in functional ecology and biodiversity** (and no overall loss of biodiversity) due to the Proposed Scheme.

7.1.1 Report Validity

61. In the event of scope or programme changes or if works do not commence within 12 months of the date of this report, then updates to the surveys may be required to ensure the validity of the data, as per CIEEM guidance⁹.
62. This report relates to proposals as detailed within Section 1.3 and is not considered valid in relation to any other design.

⁹ CIEEM (2019) Advice Note on the Lifespan of Ecological Reports and Surveys

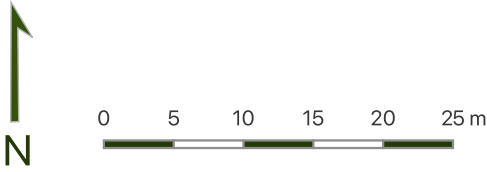
APPENDICES



APPENDIX A: RESULTS PLAN

Legend

-  Red Line Boundary
-  Ornamental Trees
-  Species-Rich Native Hedgerow with Trees
-  Native Hedgerow (species poor)
-  Non-native & Ornamental Hedgerow
-  g4 - modified grassland
-  h3 - dense scrub
-  u1b - developed land.sealed surface
-  u1.828 - vegetated garden
-  g4.839 - modified grassland - track



Project: Three Daggers, Edington

Title: PEA Map

Client: Three Daggers Operating Ltd

Date: 24/06/2025

Ref: 2502-PEA

Drawn AS

Rev 1.0





Web: www.providence-ecological.co.uk

Email: info@providence-ecological.co.uk

Phone: +44 (0) 7905 919 933

Company number: 14018609