



**Melksham Community Hospital
St. Damian's Block
Precautionary Working Method Statement**

**For NHS Property Services Ltd.
24 February 2026**



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	Project information
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1 Introduction

1.1 BACKGROUND

- 1.1.1 This Precautionary Working Method Statement (PWMS) has been produced by Davidson-Watts Ecology Ltd. as a guide for clients, contractors and any other parties that have responsibility and/or active role in the demolition of St. Damian's Block, Melksham Community Hospital, Spa Road, Melksham, Wiltshire SN12 7NZ (hereafter referred to as 'the Site'). The Site is centred approximately on ordnance survey reference ST 90885 63150. A site location plan and a site boundary can be found in Figures 1 and 2, respectively.
- 1.1.2 The PWMS provides details on good working practice when undertaking works where bats might be present in order to avoid contravention of European and Domestic Law. It will be the responsibility of NHS Property Services ('The Client') to ensure that copies are available and clearly understood by all parties involved in the development.
- 1.1.3 Planning permission is being sought to demolish St. Damian's Block.
- 1.1.4 The roof extension/tank room of St. Damians block has low suitability for roosting bats, while the rest of the building has negligible suitability. The Site has limited suitability for roosting bats with a lack of suitable surrounding habitat that is also floodlit at night. It is highly unlikely that bats are roosting at the Site. Furthermore, bat activity during a dusk emergence survey undertaken in 2025 on a building approximately 10 m away from the site was limited to four passes for a common and widespread species (Davidson-Watts Ecology Ltd. 2025). Therefore, waiting until summer to undertake a single dusk emergence survey is considered disproportionate given the likely impacts. The results of the Preliminary Bat Roost Assessment (PBRA) and the building suitability can be found in Figures 3 and 4, respectively.
- 1.1.5 A PWMS for bats is recommended to protect bats and their roosts as a result of the demolition of the Site given the low risk, and to ensure compliance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended) that provide legal protection for bats and their resting places.

1.2 LEGISLATION

- 1.2.1 In England and Wales all bat species, their breeding sites and resting places are fully protected under the Wildlife and Countryside Act 1981 (WCA) (as amended) through inclusion in Schedule 5. This Act has been further amended by the Countryside and Rights of Way Act 2000 (CRoW).
- 1.2.2 All bats are also included under The Conservation of Habitats and Species Regulation 2017, as amended, which defines 'European protected species' (EPS) of animals. These various pieces of legislation almost parallel each other, with a few small differences in wording. The legal significance of these differences had not yet been fully established and so the following account attempts to combine them to provide a simplified summary of the relevant provisions. Taken together the Act and Regulation make it illegal to:

- deliberately kill, injure or capture (or take) a bat,

- deliberately disturb a bat so as to impair their ability to survive, breed or reproduce, rear or nurture their young, to hibernation or migrate or to significantly affect the local distribution or abundance,
- intentionally or recklessly obstruct access to breeding site or place of shelter, and
- damage or destroy 'any structure or place which a bat uses for breeding or resting (including accidentally under the Habitat Regulations 1994).

1.2.3 European Union Directive on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats and Species Directive) places a legal requirement on all Member States of the European Union to protect specified habitats and species through their own domestic legislation. In the UK this has been implemented by the Conservation of Habitats and Species Regulations (2017). All species of bats are on Annex IV ('European protected species (EPS) of animal'), which requires that they are given full protection.

1.2.4 In addition, some bat species are listed as species of principal importance under S41 of the Natural Environment and Rural Communities Act 2006 and are therefore a material consideration for planning.

1.3 PROPOSED WORKS

1.3.1 The proposed works that may affect bats include:

- Potential killing, injury and disturbance to bats during the demolition of the roof extension/tank room; and
- Potential loss of roost sites through the demolition of the roof extension/tank room, thus destroying a bat roost.

1.4 ACTIONS TO BE COVERED BY THE METHOD STATEMENT

1.4.1 The actions requiring avoidance or to be undertaken under this method statement are:

- The demolition of the roof extension/tank room, in particular the removal of roof decking/fascia of this structure.

2 Survey and Site Assessment

- 2.1.1 A summary of the survey and Site assessment is provided below. The PBRA report should be referred to for the full survey methodology, results and site evaluation (Davidson-Watts Ecology Ltd. 2026).

2.2 DESK STUDY

- 2.2.1 A desk study was undertaken to review information available in the public domain. The following sources were checked for information relating to bats within a 2 km radius around the site boundary:

- Wiltshire and Swindon Biological Records Centre (SWBRC) (taken from DWE 1072 Melksham Community Hospital Bat Survey Report, 25th July 2025),
- Aerial mapping (Google Earth Pro), and
- MAGIC (Multi-Agency Geographical Information for the Countryside) (www.magic.defra.gov.uk) for known bat European Protected Species Licences (EPSLs) within 2 km of the Site.

- 2.2.2 In summary, there were 194 records of 15 bat species within 2 km of the Site in the last 10 years. The closest record related to common pipistrelle 380 m northwest of the site.

- 2.2.3 The record search also returned six roosts of seven different species within 2 km of the site in the last 10 years.

- 2.2.4 Magic also returned three EPSLs for three bat species within 2 km of the Site in the last 10 years.

2.3 PRELIMINARY BAT ROOST ASSESSMENT

- 2.3.1 A PBRA of the buildings on site was undertaken on 15th July 2025 by Freja McCall-Stevenson MRSB under Natural England Class 4 bat licence 2025-84014-CL20-BAT. The survey involved a detailed inspection of the exterior and interior of the building to identify features that bats could use for entry/exit and roosting, and to search for evidence of bat presence.

- 2.3.2 The aim of a PBRA is to determine the actual or potential presence of bats and the need for further survey and/or mitigation. In many situations it may not be possible to inspect all locations where bats may be present and therefore an absence of bat evidence does not equate to evidence of bat absence (Collins, 2023).

- 2.3.3 In summary, no evidence of roosting bats was found at the Site.

- 2.3.4 The only area of the site that contained PRFs was the roof extension/tank room (Plate 1). The PRFs included:

- Rotten timber roof decking/fascia on the exterior of the roof extension/tank room (Plate 2)
- Light ingress within the roof extension/tank room (Plate 3).

- 2.3.5 The PBRA results and locations of PRFs can be found in Figure 3. An internal view of the tank room/roof extension can be seen in Plate 4.

- 2.3.6 There is limited good quality habitat for foraging and commuting bats within the surrounding area. There is an area of vegetation to the west of the site that is partially connected to the wider landscape but was also reported to be illuminated by floodlights/security lights at night.

3 Evaluation

- 3.1.1 The site has a small number of suitable roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis by a larger number of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site).
- 3.1.2 There is no vegetation adjacent to the Site that could be used for cover for emergence or for commuting routes to or from the roof extension/tank room. Nearby vegetation to the west of the Site is floodlit at night.
- 3.1.3 Bat dusk emergence surveys were undertaken in 2025 on nearby buildings, one of which was approximately 10 m to the north of the site (Davidson-Watts Ecology 2025). The surveys confirmed that there are no bats roosting in the buildings and that bat activity generally is very low and limited to <5 passes for common pipistrelle, a common and widespread light-tolerant species.
- 3.1.4 The roof extension/tank room has low suitability for roosting bats only. The rest of the Site has negligible suitability for roosting bats (see Figure 4).
- 3.1.5 The Site does not contain features that could support classic hibernation of bats.

4 Mitigation and Compensation

4.1 TIMING OF WORKS

- 4.1.1 As no maternity or hibernation roosts have been recorded on site and the roof extension/tank room may be suitable for individual or small numbers of common, light-tolerant species as a day roost only, there is no restriction on when the proposed works can be carried out.

4.2 TOOLBOX TALK

- 4.2.1 A toolbox talk will be provided by a licensed bat ecologist to all site contractors regarding the mitigation requirements of the method statement. The contractors should sign to say they have received this training prior to the commencement of works. The method statement will be retained on site throughout the soft demolition of the roof extension/tank room.

4.3 PRE-WORKS INSPECTION

- 4.3.1 Prior to the commencement of works, a bat-licensed ecologist will inspect the roof extension/tank room both internally and externally using torch light and an endoscope for the presence of bats.

4.4 ECOLOGICAL SUPERVISION

- 4.4.1 A bat-licensed ecologist will directly supervise the soft demolition of the roof extension/tank room. A contractor should carefully remove the roof material under direct supervision of the licensed bat ecologist. All roofing materials should be removed until the structure is declared destroyed/unsuitable for roosting bats by the ecologist.
- 4.4.2 In the unlikely event that a bat is injured during the works, it will be taken immediately to the closest suitably experienced veterinary surgery for attention, and if required, after-care provided by a bat carer.
- 4.4.3 The emergency contact for bats during the demolition works is:
- Freja McCall-Stevenson: +44 7939 885556 (Class 4 Bat Licence holder and previous bat carer registered with the Bat Conservation Trust).
- 4.4.4 In the unlikely situation that a bat is found at any point during the works, works will stop immediately and the roost will be carefully reinstated (if necessary and possible). Appropriate mitigation including acquisition of a Natural England Bat Mitigation Licence or Bat Earned Recognition (BER) Licence will be sought prior to re-commencement of the works.

4.5 COMPENSATION AND ENHANCEMENT

- 4.5.1 Two bat boxes (one crevice and one cavity) will be installed in suitable locations near the Site to provide a long-term increase in roost provision for bats. These will be placed in a south or west facing location at a height of 4 to 5 m and should be away from any external lighting or light spill. Locations of bat boxes will be agreed on site with a suitably experienced bat ecologist.
- 4.5.2 Enhancements to further increase the roosting habitat for bats on site, such as installing a bat access tile on a new roof and the installation of additional bat boxes on trees and buildings across the wider hospital site, although not a requirement, will be beneficial for supporting local bat populations.

4.6 LIGHTING

- 4.6.1 Bats using the bat boxes could be deterred by artificial lighting. No new external lighting should be installed that would result in an increase in light spill onto the bat boxes.

4.7 LIFESPAN OF SURVEYS

- 4.7.1 Where the survey data is 18 months or older, it is likely that update surveys and reporting will be required for planning or licensing purposes as bats are highly mobile species (CIEEM 2019).

5 References

- CIEEM (2019). Advice Note on the Lifespan of Ecological Reports and Surveys.
- CIEEM (2019). Guidelines for Ecological Impact Assessment in the United Kingdom.
- Collins (ed) (2023). Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th Edition, Bat Conservation Trust.
- Davidson-Watts Ecology Ltd. (2026). 1121 Melksham St. Damian's Block PBRA Report.
- Davidson-Watts Ecology Ltd. (2025). 1072 Melksham Community Hospital Bat Survey Report.
- HMSO The Conservation of Habitats and Species Regulations 2017.
- HMSO The Countryside and Rights of Way Act 2000.
- HMSO Wildlife and Countryside Act 1981.
- Reason, P.F. and Wray, S. (2023). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.1. Chartered Institute of Ecology and Environmental Management, Ampfield.

Figure 1 Site Location Plan



Figure 2 Site Boundary



Figure 3 PBRA Survey Results

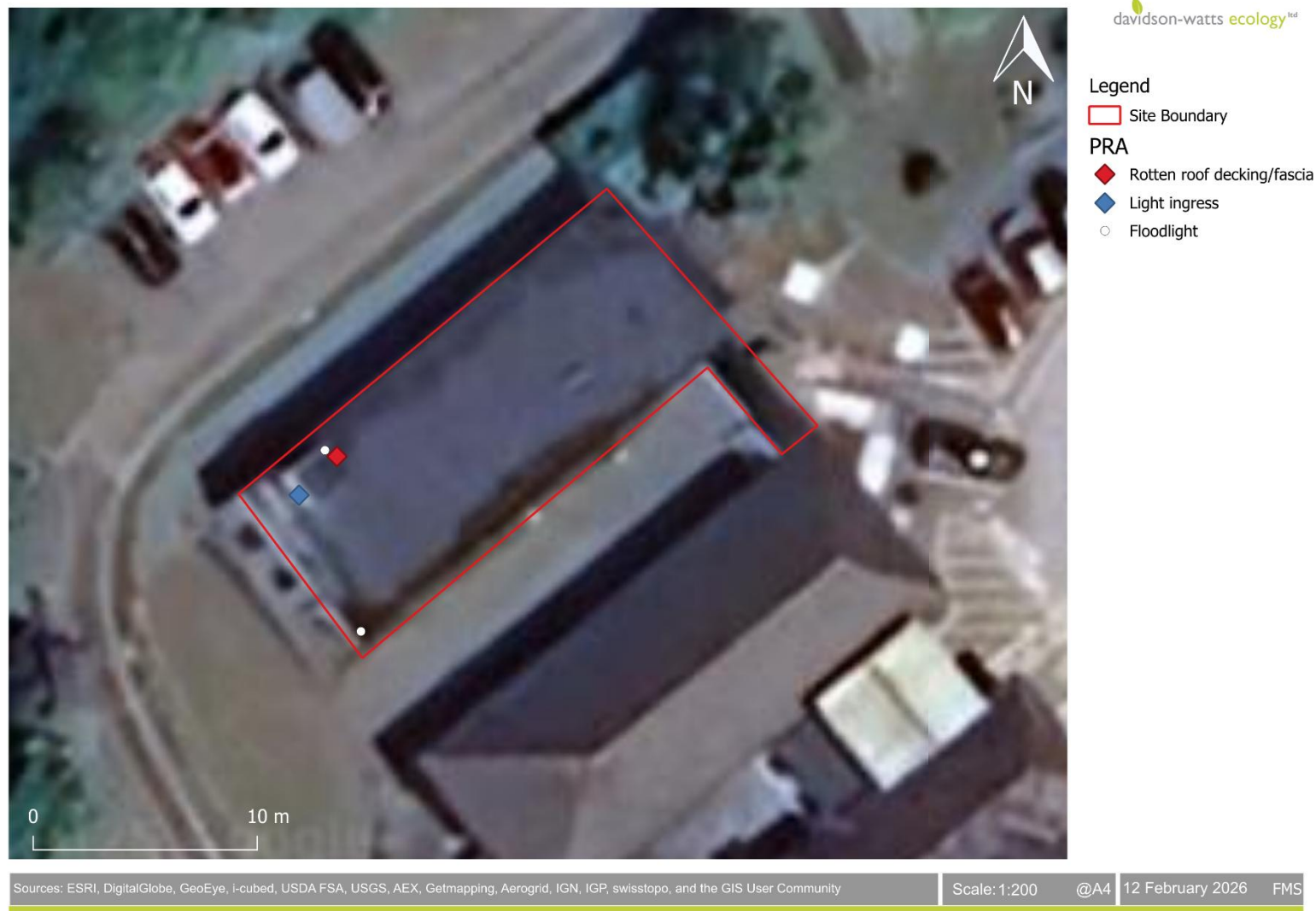


Figure 4 Suitability of Building for Bats



Appendix A Plates

Plate 1: Southwestern aspect of the Site showing the roof extension/tank room.



Plate 2: Rotten roof decking/fascia on the roof extension/tank room.



Plate 3: Cut out hole into roof void/tank room potentially creating area of light ingress.



Plate 4: Loft void/tank room within roof extension.

