



**Melksham Community Hospital
St. Damian's Block
Preliminary Bat Roost Assessment
NHS Property Services Ltd.
12 February 2026**



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1 Introduction

1.1 BACKGROUND

- 1.1.1 This report presents the findings of a Preliminary Bat Roost Assessment (PBRA) at 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 and a site location plan can be found in Figure 1. The survey work was carried out by Davidson-Watts Ecology Ltd on behalf of NHS Property Services Ltd.
- 1.1.2 The Site consists of a single-storey flat-roof building connected to the 'Main Reception' building. It contains several rooms that were once used for hospital purposes, as well as a boiler room and small roof void containing a water tank. The Site is no longer in-use by the hospital.
- 1.1.3 The Site sits in an urban landscape of largely built-up habitat with some amenity areas. It is situated in the south of Melksham town with residential housing on the north, east and south. The surrounding habitats are mainly developed land in the form of car parks, roads, pavements, walkways and commercial buildings. To the west and south, there are some amenity grassland, treelines and hedgerows that are somewhat connected to the wider landscape. Beyond the immediate urban landscape sits a mosaic of arable, pasture and some woodland habitats. The River Avon is located approximately 1.1 kilometres (km) to the northwest of the site and the Kennet and Avon Canal is located approximately 2.1 km south. An aerial view map with associated red line boundary is shown in Figure 2 and a greater site plan is shown in Figure 3.
- 1.1.4 It is understood that the current plans include the demolition of the Site.

1.2 OBJECTIVES

- 1.2.1 A PBRA is a systematic detailed inspection of the exterior and interior of a structure to identify potential or actual bat access points, roosting places, and field evidence of bats. Evidence of bats can include live or dead specimens, bat droppings, urine splashes and/or fur-oil staining. The aim of this survey is to determine the actual 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).
- 1.2.2 The aim of this report is to identify habitats of ecological value or with the potential to support bats which may be affected by the proposed development. This report will make further recommendations where appropriate to enable the determination of the full ecological value of the structure and habitats on site.

2 Legislation

2.1 BAT LEGISLATION

- 2.1.1 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).
- 2.1.2 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).
- 2.1.3 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.
- 2.1.4 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.

3 Methodology

3.1 DESK STUDY

3.1.1 The purpose of the desk study is 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.

3.2 PRELIMINARY BAT ROOST ASSESSMENT

3.2.1 A PBRA of the buildings on site was undertaken which involved a detailed inspection of the exterior and interior of each building to identify features that bats could use for entry/exit and roosting, and to search for evidence of bat presence. 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).

3.3 EXTERNAL BUILDING SURVEY

3.3.1 A systematic external search of the Site was undertaken on 11 March 2025, using binoculars, torches, mirrors or endoscopes as necessary to identify potential or actual resting places or bat access points (for example, loose or missing tiles; missing mortar at gable ends; hanging tiles or wooden cladding; raised lead flashing; gaps beneath the eaves; broken windows; damaged air vents and recesses in stonework). Characteristic field signs of bat presence, for example live or dead specimens, accumulations of droppings or obvious scratch/wear marks were also identified where possible. It should be noted that sometimes bats leave no visible signs of their presence and external signs can be washed away.

3.4 INTERNAL BUILDING SURVEY

3.4.1 A systemic search was undertaken of the interior of buildings within the site boundary to identify potential access points and roosting places, and to locate any evidence of bats.

3.4.2 Evidence of bats could include droppings, urine staining, fur-oil staining, feeding remains (for example, large accumulations of moth wings), and individual bats, including audible noise by bats. An endoscope, torch, mirror or close-focussing camera were used when required to enable closer inspection of potentially important features. It should be noted that sometimes bats leave no visible sign of their presence even on the inside of the building, particularly when hidden in cracks, crevices, and voids. All torches were turned off to enable identification of potential roost access points through light spill.

- 3.4.3 Detail of internal structures was noted, such as the presence and location of timber joists and other features supporting roost features, internal dimensions (width, length, height) of voids, the location of internal roosting points/opportunities, and the location of access points. Any vegetation adjacent to the structure that could be used by emerging bats was also noted where present. An assessment of the potential of buildings to support roosts was made in line with the Bat Conservation Trust (BCT) survey guidelines (Collins, 2023) shown in Table 1 below.
- 3.4.4 The PBRA was undertaken on 15th July 2025 by Freja McCall-Stevenson MRSB under Natural England Class 4 bat licence (2025-84014-CL20-BAT).

Table 1: Criteria for categorising buildings for their potential to support roosting bats (taken from Table 4.1 Collins, 2023).

Suitability	Description of building
None	No habitat features on site likely to be used by any roosting bats at any time of the year. No habitat features likely to be used for commuting or foraging at any time of the year.
Negligible	No obvious habitat features on site likely to be used by roosting bats, however a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential 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 but could be used by individual hibernating bats). Habitats that could be used by a small number of bats as flight paths but not well connected to the wider landscape, or suitable, isolated habitat.
Moderate	A structure with one or more potential roost features that may be used by bats due to their size, shelter, protection, condition and surrounding habitat. Unlikely to support a roost of high conservation value (roost type only – hibernation or maternity). Continuous habitat connected to the wider landscape e.g. tree lines, linked back gardens, trees, scrub, grassland or water that could be used as flight lines or for foraging.
High	A structure with one or more potential roost features that are suitable for use by a large number of bats on a regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. Continuous high-quality habitat that is well connected to the wider landscape. Site close to and connected to known roosts.
Confirmed	Confirmed bat roost where bats are recorded as present or where evidence of use by bats has been recorded. Where there are multiple roost features present, a building may be confirmed as a confirmed roost, but also still have further suitability.

4 Results

4.1 DESK STUDY

4.1.1 The records search returned 194 records of bats within 2 km of the site within the last 10 years. 26 of these records related to roost count data. The records related to the following species:

- Barbastelle *Barbastella barbastellus*,
- An unknown bat species *Chiroptera sp.*,
- Serotine *Eptesicus serotinus*,
- An unknown Myotis species *Myotis sp.*,
- Daubenton's bat *Myotis daubentonii*,
- Whiskered bat *Myotis mystacinus*,
- Natterer's bat *Myotis nattereri*,
- Leisler's bat *Nyctalus leisleri*,
- Noctule *Nyctalus noctula*,
- Nathusius's pipistrelle *Pipistrellus nathusii*,
- Common pipistrelle *Pipistrellus pipistrellus*,
- Soprano pipistrelle *Pipistrellus pygmaeus*,
- Brown long-eared bat *Plecotus auritus*,
- Greater horseshoe bat *Rhinolophus ferrumequinum*, and
- Lesser horseshoe bat *Rhinolophus hipposideros*.

4.1.2 The closest record related to common pipistrelle 380 m northwest of the site.

4.1.3 The record search also returned six roosts of seven different species within 2 km of the site. These related to serotine, Daubenton's bat, whiskered bat, common pipistrelle, soprano pipistrelle, brown long-eared bat, and lesser horseshoe bat.

4.1.4 The online DEFRA database MAGIC was checked for records of granted bat EPSLs within 2 km of the Site. The search returned three EPSLs within 2 km of the Site in the last 10 years. Details of the licences, including approximate distances from the Site, are included in the Table 2 below.

Table 2: Bat EPSL records within 2 km of the site in the last 10 years (from MAGIC, 2026).

Licence number	Species	Distance and direction from the site	Licence impacts	Date
2015-14691-EPS-MIT	Common pipistrelle brown long-eared and serotine	500 m southwest	Destruction of a resting place	2015 - 2025
2017-31272-EPS-MIT	Common pipistrelle and brown long-eared	1 km southwest	Destruction of a resting place	2017 - 2018
2015-14789-EPS-MIT	Common pipistrelle	1.8 km southeast	Destruction of a resting place	2015 - 2020

4.2 BUILDING DESCRIPTION

- 4.2.1 The Site is a single-storey single-skinned timber pre-fabricated building with a flat bitumen roof (Plates 1 to 4). There is plastic cladding spanning the walls just beneath the roof which is mounted on a metal frame. There are metal-framed windows on all aspects of the building. There are flood lights present on the northwestern and southwestern aspects of the building which were reported to be on all night (Plate 7).
- 4.2.2 There is a small box extension on the roof with a roof void that houses a water tank and beneath the water tank is a boiler room (Plate 2).
- 4.2.3 Internally, the main entrance to the Site opens into a large waiting room with a small store cupboard and toilet (Plate 11). There is a connecting corridor to the main reception building to the southeast (Plate 4). The remaining extent of the building consists of a long corridor with several rooms branching off for hospital use (Plate 12), comprising examination rooms and a toilet (Plate 13). The rooms are no longer in use.

4.3 EXTERNAL INSPECTION

- 4.3.1 The external survey of the Site confirmed suitability for roosting bats in one location only.
- 4.3.2 Rotten timber roof decking/fascia could be seen on the edges below the bitumen roof of the box extension that houses the water tank, particularly on the northeastern side (Plate 5). This created small crevices that could be seen with a torch and binoculars; the crevices did not appear to go through to the interior. This PRF is also very close to flood lighting mounted on the northwestern side of the roof extension which is reported to be on all night and would illuminate the nearby vegetation (Plate 7). The locations of the potential roost features (PRFs) can be found in Figure 4.
- 4.3.3 The rest of the Site was in good condition with no other PRFs observed. There were some pipe outlets and vents present, but they appeared to be blocked off and did not create an access point through to the interior of the building.
- 4.3.4 No evidence of use by bats was recorded externally at the Site.

4.4 INTERNAL INSPECTION

- 4.4.1 The internal survey of the Site confirmed suitability for roosting bats in one location only.

- 4.4.2 The roof void is a ~2 x 2 m box extension on the southwest of the roof that is ~1 m high. Internally, the roof void has a timber-frame construction with purlins/beams and plywood boarding (Plate 9). The conditions in the roof void were very dry and warm, due to being above the boiler room and housing the water tank.
- 4.4.3 There was an area of light ingress coming from the southwestern wall of the roof void due to a small cut-out hole for a missing pipe or vent (Plate 6). No bat evidence and no other PRFs were seen internally, however the area behind the water tank could not be accessed during the inspection. The loft hatch was tight-fitting and remains closed, meaning there is no egress to the boiler room below (Plate 10). The locations of the PRFs can be found in Figure 4.
- 4.4.4 The rest of the interior of the Site had negligible suitability for bats. There were no points of egress or internal PRFs. The windows also let in large amounts of light during the day.

4.5 COMMUTING AND FORAGING HABITAT

- 4.5.1 There is limited good quality habitat for foraging and commuting bats within the surrounding area.
- 4.5.2 There is some foraging and commuting habitat to the west of the site that is partially connected to the wider landscape, including a network of grassland and associated hedgerows and treelines, and very small areas of broadleaved woodland (Plate 8). However, the area of vegetation to the west is reported to be illuminated by flood lights mounted on the northwestern and southwestern aspects of the Site.

4.6 SURVEY CONSTRAINTS

- 4.6.1 The roof void was mostly accessible, and it was possible to view almost the entire space during the survey, apart from behind the water tank, which could not be viewed from the ground. This is not considered to present a constraint to the overall findings of the survey, as it was still possible to evaluate the suitability of the Site for roosting bats.

5 Evaluation

- 5.1.1 There are two potential roost features for bats at the Site, these include:
- Rotten timber roof decking/fascia
 - Light ingress within the roof void/tank room
- 5.1.2 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 but could be used by individual hibernating bats).
- 5.1.3 There are habitats present in the surrounding area that could be used by a small numbers of common light-tolerant species as flight paths, but it is not well connected to the wider landscape.

- 5.1.4 There is flood lighting present on the southern and western aspects of the site that have been reported to be on all night, reducing the suitability of the Site for light-sensitive bat species.
- 5.1.5 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 Ltd. 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.
- 5.1.6 Therefore, the roof extension/tank room has been evaluated as having low suitability for roosting bats only. The rest of the Site has negligible suitability for roosting bats. The suitability of the building for bats is depicted in Figure 5.
- 5.1.7 The Site does not contain features that could support classic hibernation of bats. The external PRFs and the roof void/tank room did not provide the humidity or thermal stability required for a classical hibernation roost. Therefore, no hibernation surveys are required.

6 Recommendations

- 6.1.1 Where the possibility that bats are present cannot be eliminated, further surveys such as presence absence surveys are typically required (Collins, 2023).
- 6.1.2 The roof extension/tank room has low roost suitability for roosting bats and the rest of the Site has negligible suitability. Therefore, typically one dusk emergence survey between May and August would be required to help determine whether bats are roosting within the suitable features noted on the Site.
- 6.1.3 However, as the Site has limited suitability for roosting bats and a lack of suitable surrounding habitat that is also floodlit at night, it is highly unlikely that bats are roosting at the Site and waiting until summer to undertake a single dusk emergence survey is considered disproportionate. 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).
- 6.1.4 Therefore, a Precautionary Working Method Statement (PWMS) for bats is recommended to address the potential harm for bats or damage to their roosts as a result of the demolition of the Site that was identified to contain PRFs (roof extension/tank room only), 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 (see section 2).
- 6.1.5 The PWMS will include measures such as a toolbox talk for all building and roofing contractors, a pre-works inspection by a licensed bat ecologist and supervised soft demolition until the Site is declared destroyed/unsuitable for roosting bats by the licensed bat ecologist.
- 6.1.6 In the unlikely situation that a bat is found, 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 will be sought.

6.2 LIFESPAN OF SURVEYS

- 6.2.1 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).

7 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.

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HMSO The Conservation of Habitats and Species Regulations 2017.

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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 Greater Site Layout

The Site (St. Damian's Block) is highlighted by the red circle below.

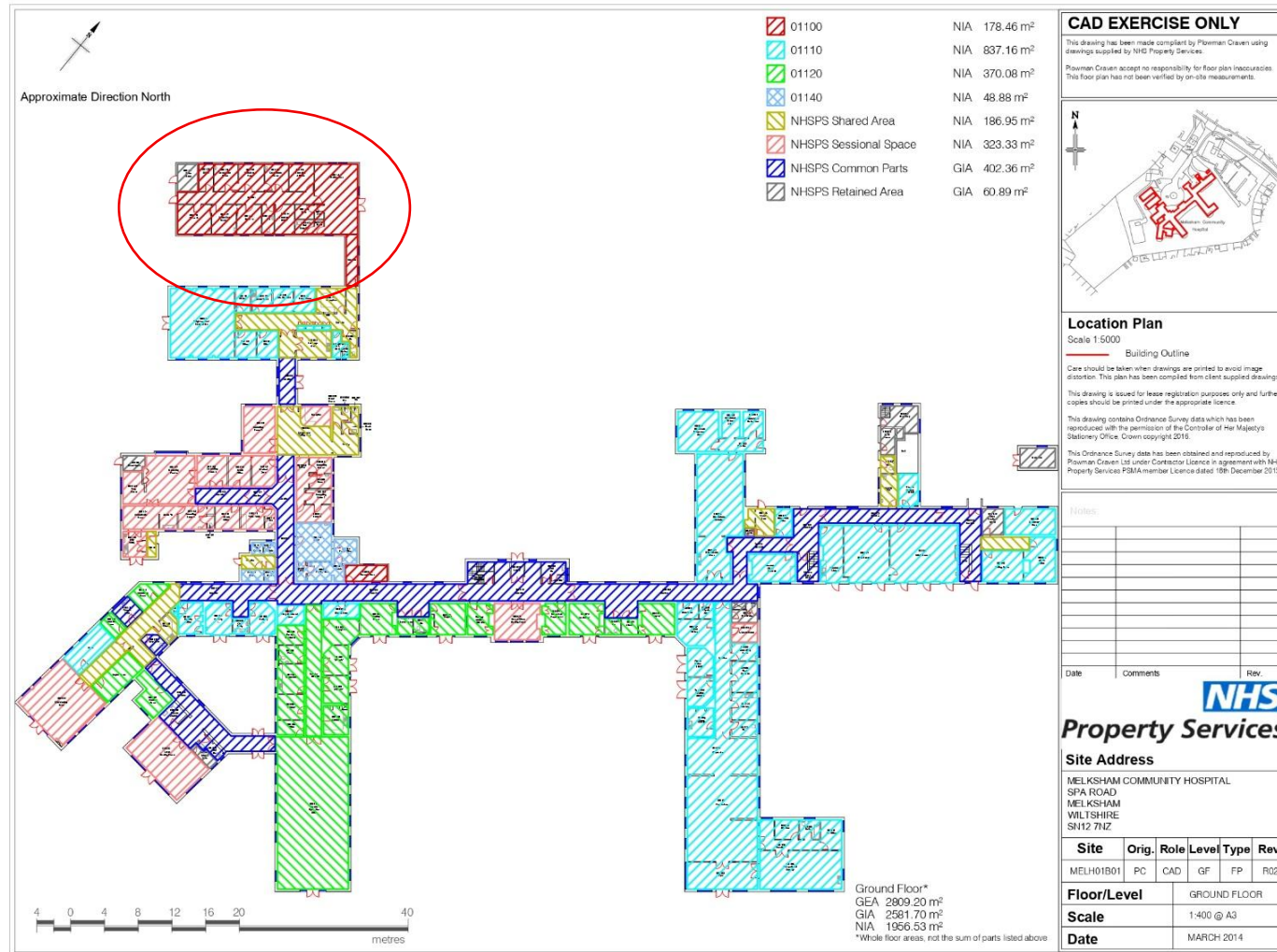


Figure 4 PBRA Survey Results

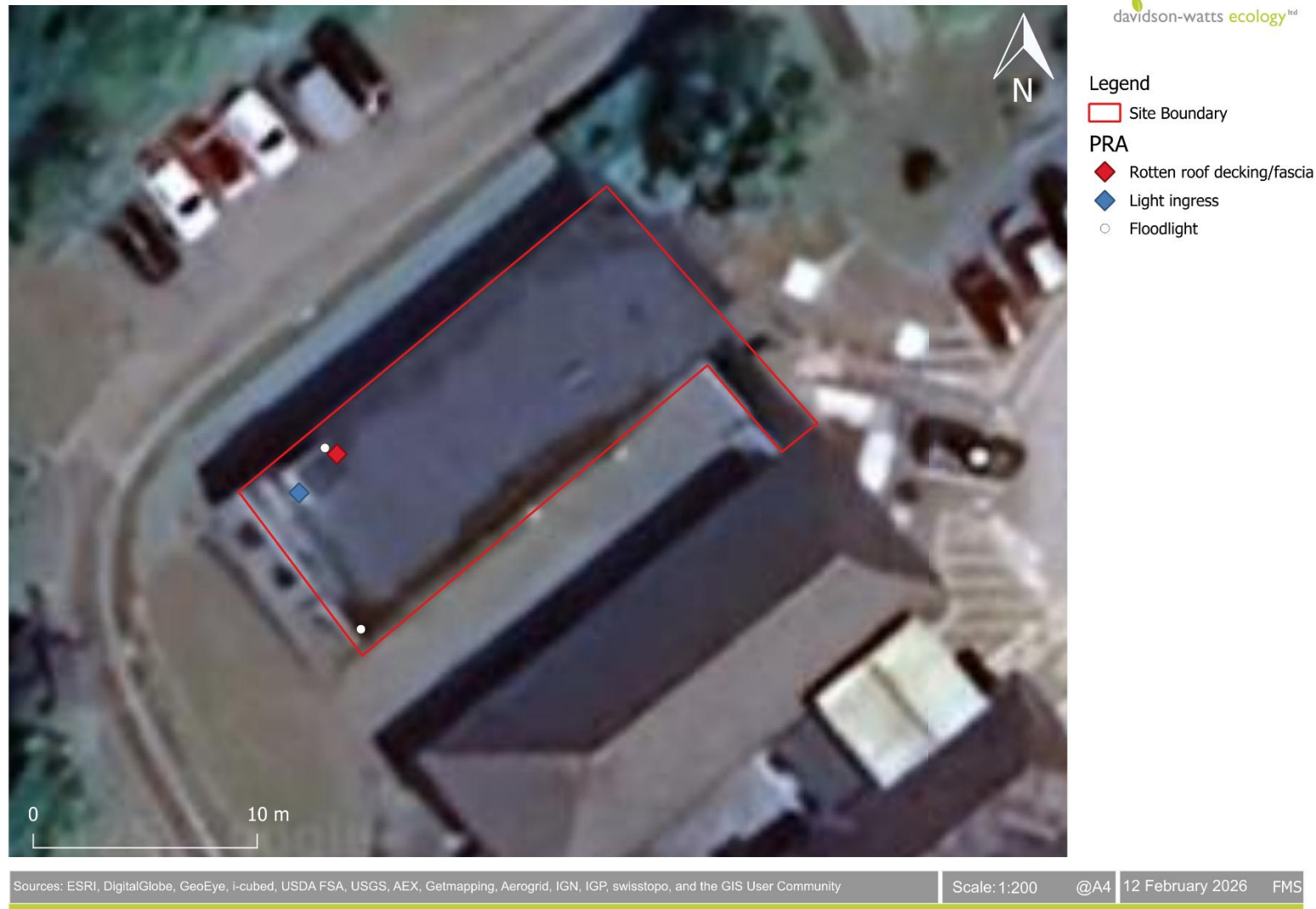


Figure 5 Suitability of Building for Bats



Appendix A Plates

External:

Plate 1: northeastern aspect of the Site showing the 'front' main entrance.



Plate 2: Northwestern aspect of the Site showing the roof extension/tank room.



Plate 3: Southwestern aspect of the Site showing the boiler room entrance (blue door) and the rear/fire exit.



Plate 4: Southeastern aspect of the Site showing the connecting corridor to the main reception.



Plate 5: Rotten roof decking/fascia on the roof extension/tank room.



Plate 6: Cut out hole into roof void/tank room potentially creating area of light ingress.



Plate 7: Flood lighting on the northwestern and southwestern aspects of the Site.



Plate 8: Nearby habitat to the west.



Internal:

Plate 9: Loft void/tank room within roof extension



Plate 10: Boiler room and loft hatch



Plate 11: Main entrance waiting room and storeroom



Plate 12: Main corridor with examination rooms branching off



Plate 13: One of the examination rooms, all were very similar.



Appendix B Relevant Planning Policy

NATIONAL PLANNING POLICY

The National Planning Policy Framework (NPPF) (12 December 2024) Chapter 15 outlines out how the planning system should contribute to and enhance the natural and local environment by protecting sites of biodiversity value, recognising wide benefits from natural capital, minimising impacts on and providing net gains for biodiversity. If a proposed development would result in significant harm to the natural environment, Site of Special Scientific Interest or irreplaceable habitats which cannot be avoided (through the use of an alternative site with less harmful impacts), mitigated or compensated for (as a last resort) then planning permission should be refused. 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.

To minimise impacts on biodiversity and geodiversity, planning policies should identify and map components of the local ecological networks, including the hierarchy of sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat management, enhancement, restoration or creation, 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 (Paragraph 192).

The NPPF retains protection for Local Wildlife Sites which are clearly recognised in the framework as locally designated sites of importance for biodiversity (Paragraph 188). The policy provides the direction for local authorities to identify, map and protect these sites through local plans. The new policy also requires protection of Local Wildlife Sites to recognise the importance and the contribution that they make to wider ecological networks, as stated in the Government's own Natural Environment White Paper.

Planning principles to be applied include planning refusal if significant harm to biodiversity as a result of a development cannot be avoided, development can only take place where there are adverse effects on a Site of Scientific Interest 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 development whose primary objective is to conserve or enhance biodiversity should be supported especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate (Paragraph 193).

The Natural Environment and Rural Communities (NERC) Act came into force on 1st Oct 2006. Section 41 (S41) of the Act requires the Secretary of State to publish a list of habitats and species which are of principal importance for the conservation of biodiversity in England. The S41 list is used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal functions. Fifty-six habitats of principal importance and 943 species of principal importance are included on the S41 list. These are

all the habitats and species in England that were identified as requiring action in the UK Biodiversity Action Plan (UK BAP) and continue to be regarded as conservation priorities in the subsequent UK Post-2010 Biodiversity Framework. Bats are listed as priority species under the NERC Act 2006.

In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This is referred to as biodiversity net gain in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

Under the statutory framework for biodiversity net gain, every grant of planning permission is deemed to have been granted subject to a general biodiversity gain condition to secure the biodiversity gain objective. This objective is to deliver at least 10% increase in relation to the pre-development biodiversity value of the development granted permission. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits. BNG will be measured using Defra's biodiversity metric and habitats will need to be secured for at least 30 years.

LOCAL PLANNING POLICIES

Wiltshire Core Strategy, adopted 2015

The Wiltshire Core Strategy details the following within 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.

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.