

UPDATE BAT SURVEY RESULTS REPORT

10 Gun Street, Reading, RG1 2JR

JULY 2025 | FN22-024C | VERSION 1 | KH



Client Name & Address	PDR Ltd, 9 Gun Street, Reading, RG1 2JR
Site Location	10 Gun Street, Reading, RG1 2JR
Project Name	Gun Street
Project Code	FN22-024C

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EXECUTIVE SUMMARY

Future Nature Wildlife Trust Consultancy (WTC) was commissioned by PDR Ltd. on 14 May 2025 to assist with the discharge of ecology related planning conditions for a consented development (ref: PL/23/0107) at 10 Gun Street, Reading (henceforth, 'the Site'). The Site currently comprises a former office building that is now in a state of disrepair. The wider area surrounding the Site consists of the urban landscape of the city of Reading.

The Site has received planning permission (ref: PL/23/0107) for a partial change of use from offices (Class E) to provide an expansion to existing entertainment venue (Sui Generis Use) at 9 Gun Street (Purple Turtle) with erection of rear extensions and internal alterations, and a detached 3-storey ancillary building to rear boundary with yard over Holy Brook. Condition 13 of the planning application decision notice requires that a licence for development works affecting bats is applied for. As previous surveys of the Site were undertaken more than 2 years ago, update surveys for bats are required to inform the licence application.

No changes were recorded to the building during the update Preliminary Roost Assessment (PRA) and no signs of roosting bats were recorded during the survey. The building is still unused and remains in a poor state of repair. The previously identified PRFs remain present and no new PRFs were identified during the update PRA surveys. The building overall was assessed as having *High* roost potential. Additionally, no bats were found to emerge from the building during the update emergence surveys.

Based on the results of the update PRA and emergence surveys detailed in this report it is considered unlikely that the building on Site is still being utilised as a roost by bats. As previous surveys of the Site are now out of date and the update surveys have found no evidence of roosting bats, it is not considered that there is any basis on which to apply for a licence. Therefore, it is recommended that this report is submitted to the Local Planning Authority to demonstrate that update surveys undertaken of the Site as detailed herein have not found any evidence that the building is currently being used as a roost by bats.

Whilst no bats were found to be currently using the building as a roost, PRF's remain present and therefore any works affecting them should be undertaken under a precautionary working method statement (PWMS). The PWMS should set out measures to reduce the potential risks of disturbing bats and their roosts, including suitable timing and sensitive working methods.

1. INTRODUCTION

1.1 BACKGROUND TO COMMISSION

Future Nature Wildlife Trust Consultancy (WTC) was commissioned by PDR Ltd. on 14 May 2025 to assist with the discharge of ecology related planning conditions for a consented development (ref: PL/23/0107) at 10 Gun Street, Reading (henceforth, 'the Site').

1.2 SITE LOCATION & DESCRIPTION

The Site is located at 10 Gun Street, Reading, RG1 2JR and is centred on ordnance survey grid reference SU 71478 73272. The Site currently comprises a former office building that is now in a state of disrepair. The wider area surrounding the Site consists of the urban landscape of the city of Reading.

1.3 PROJECT DESCRIPTION

The Site has received planning permission (ref: PL/23/0107) for a partial change of use from offices (Class E) to provide an expansion to existing entertainment venue (Sui Generis Use) at 9 Gun Street (Purple Turtle) with erection of rear extensions and internal alterations, and a detached 3-storey ancillary building to rear boundary with yard over Holy Brook. Condition 13 of the planning application decision notice states:

"No development shall commence on site (including demolition or preparatory works) until a licence for development works affecting bats has been obtained from the Statutory Nature Conservation Organisation (Natural England) and a copy has been submitted to and approved in writing by the Local Planning Authority. Thereafter mitigations measures approved in the licence shall be maintained in accordance with the approved details. Should conditions at the site for bats change and the applicant conclude that a licence for development works affecting bats is not required the applicant is to submit a report to the Local Planning Authority detailing the reasons for this assessment and this report is to be approved in writing by the Local Planning Authority."

As previous surveys of the Site were undertaken more than 2 years ago, update surveys for bats are required to inform the licence application.

1.4 REPORT OBJECTIVES

This report appends the Ecology Assessment for the Site that was submitted as part of the original planning application (ref: PL/23/0107) and sets out the methodology and results of the update bat surveys undertaken of the Site, and includes updated recommendations where necessary.

2. METHODOLOGY

2.1 UPDATE DESK STUDY (BATS ONLY)

A desk-based study was undertaken to obtain updated information about the presence of bats within the vicinity of the Site.

The Department for Environment, Food, and Rural Affairs' Multi Agency Geographic Information for the Countryside (MAGIC)¹ website was consulted for information on any licence returns for bats within 2km of the Site.

The Thames Valley Environmental Records Centre (TVERC) was contacted to obtain records of bats from within 2km of the Site boundary. Data from TVERC was returned on 18 July 2025.

2.2 UPDATE PRELIMINARY ROOST ASSESSMENT (PRA)

An update Preliminary Roost Assessment (PRA) was carried out to determine whether the potential of the building to support roosting bats had changed since the previous surveys were carried out. The update PRA was carried out on 20 May 2025 by Julie Watson MCIEEM, who holds a Level 2 bat survey licence. The update PRA survey was undertaken with reference to the Bat Conservation Trust Good Practice Guidelines².

A ground-based external assessment of the building was undertaken to search for Potential Roost Features (PRFs) and any bat field signs, such as scratching and staining around entry points and accumulations of droppings below PRF's. An internal inspection of suitable spaces, such as the roof void and unoccupied rooms/buildings, was undertaken. PRF's were searched for within these spaces along with signs of bat presence, including live or dead bats, droppings, urine staining and feeding remains. The results were used to determine the suitability of the building as a bat roost and rated from having no suitability to high suitability. The suitability criteria are described in Appendix B.

2.3 UPDATE BAT EMERGENCE SURVEYS

Update bat emergence surveys were carried out to identify whether bats continue to utilise the building as roost. The update emergence surveys were undertaken with reference to the

¹ DEFRA, "Multi Agency Geographic Information for the Countryside (MAGIC)," Department for Environment, Food, and Rural Affairs, <https://magic.defra.gov.uk/>. DEFRA, "Multi Agency Geographic Information for the Countryside (MAGIC)," Department for Environment, Food, and Rural Affairs, <https://magic.defra.gov.uk/>.

² J Collins, Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition (2023), <https://www.bats.org.uk/resources/guidance-for-professionals/bat-surveys-for-professional-ecologists-good-practice-guidelines-4th-edition>. J Collins, Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition (2023), <https://www.bats.org.uk/resources/guidance-for-professionals/bat-surveys-for-professional-ecologists-good-practice-guidelines-4th-edition>.

Bat Conservation Trust Good Practice Guidelines³. Surveyors observed the building from pre-defined vantage points from 15 minutes before sunset to between 1.5 hours and 2 hours after sunset, depending on activity levels. One surveyor was located to the north of the building where they could observe PRFs on the northern elevation, and the other to the south of the building where they could observe PRFS on the southern elevation. Each surveyor was equipped with an infra-red camera (Canon XA40 and Nightfox Whisker) and ultrasonic bat detector (Echo Meter Touch Pro and Anabat Scout) to aid in the sighting and identification of bats. Notes were made of any emergences that were observed, as well as of general bat activity around the building.

³ Collins, Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition. Collins, Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition.

3. RESULTS

3.1 UPDATE DESK STUDY (BATS ONLY)

There are a total of 346 records of bat species from within 2km of the Site. These are summarised in Table 3.1, below. There are seven records from the Site itself which were identified during previous surveys of the Site in 2022, all of which are of common pipistrelle bats and included several confirmed roosts.

Table 3.1: Records of bat species within 2km of the Site

Common Name	Scientific name	Number of records	Most recent
Bat	<i>Chiroptera</i>	8	2023
Brown Long-eared Bat	<i>Plecotus auritus</i>	1	2021
Common Pipistrelle	<i>Pipistrellus pipistrellus</i>	93	2023
Daubenton's Bat	<i>Myotis daubentonii</i>	73	2019
Long-eared Bat species	<i>Plecotus</i>	2	2018
Myotis Bat species	<i>Myotis</i>	17	2023
Nathusius's Pipistrelle	<i>Pipistrellus nathusii</i>	16	2021
Noctule	<i>Nyctalus noctula</i>	38	2023
Pipistrelle	<i>Pipistrellus</i>	40	2022
Serotine	<i>Eptesicus serotinus</i>	1	2018
Soprano Pipistrelle	<i>Pipistrellus pygmaeus</i>	57	2023

3.2 UPDATE PRELIMINARY ROOST APPRAISAL (PRA)

No changes were recorded to the building since the previous PRA and no signs of roosting bats were recorded during the survey. The building is still unused and remains in a poor state of repair. The previously identified PRFs remain present and no new PRFs were identified during the update PRA surveys. The building overall was assessed as having *High* roost potential.

3.3 UPDATE BAT EMERGENCE SURVEYS

The results of the emergence surveys are summarised in Table 3.2, below. No bats were recorded emerging from the building.

Table 3.2: Emergence survey results

Date	Surveyors	Time	Weather	Emergences	Activity
05/06/25	Jessica Dickens Grace Rawlinson	21:00 – 22:45	Temp: 14°C Wind: 9mph Cloud: 8/8 Rain: None	None	Regular common pipistrelle bats foraging and commuting around / past the building, as well as occasional soprano pipistrelle and noctule bats.
07/07/25	Kai Hayes Alex Donnelley	21:06 – 22:51	Temp: 18°C Wind: 10mph Cloud: 0/8 Rain: None	None	Regular common pipistrelle bats foraging and commuting around / past the building, as well as occasional soprano pipistrelle and noctule bats.

4. DISCUSSION AND RECOMMENDATIONS

Based on the update PRA and emergence surveys detailed in this report it is considered unlikely that the building on Site is still being utilised as a roost by bats, as no evidence of roosting bats was found and none were seen to emerge from the building. As previous surveys of the Site are now out of date and the update surveys have found no evidence of roosting bats, it not considered that there is any basis on which to apply for a licence.

Condition 13 of the planning application decision notice states the following (emphasis added in bold):

*"No development shall commence on site (including demolition or preparatory works) until a licence for development works affecting bats has been obtained from the Statutory Nature Conservation Organisation (Natural England) and a copy has been submitted to and approved in writing by the Local Planning Authority. Thereafter mitigations measures approved in the licence shall be maintained in accordance with the approved details. **Should conditions at the site for bats change and the applicant conclude that a licence for development works affecting bats is not required the applicant is to submit a report to the Local Planning Authority detailing the reasons for this assessment and this report is to be approved in writing by the Local Planning Authority.**"*

Therefore, it is recommended that this report is submitted to the Local Planning Authority to demonstrate that update surveys undertaken of the Site as detailed herein have not found any evidence that the building is currently being used as a roost by bats.

Whilst no bats were found to be currently using the building as a roost, PRF's remain present and therefore any works affecting them should be undertaken under a precautionary working method statement (PWMS). The PWMS should set out measures to reduce the potential risks of disturbing bats and their roosts, including suitable timing and sensitive working methods, details of which are provided below.

4.1 MITIGATION STRATEGY

An outline of the recommended mitigation measures is set out below, including precautionary methods of working and the erection of suitable bat boxes. These measures have been informed by the guidance provided in the UK Bat Mitigation Guidelines⁴.

Timing of works

⁴ CIEEM, *UK Bat Mitigation Guidelines* (2023), <https://cieem.net/resource/uk-bat-mitigation-guidelines-2023/>.

The proposed works should not be undertaken during the summer months when there is the most chance of bat use. Therefore, it is recommended that works are undertaken in the winter, spring or autumn (i.e., September to April).

Supervision

As a precautionary measure, an ecological watching brief is recommended whereby a licensed bat ecologist would oversee works affecting PRF's identified on the building. The ecologist would deliver a toolbox talk before works commenced and the PRF's would be closely inspected for bats immediately prior to removal and then removed by contractors by hand under the guidance of the ecologist.

Should a bat be discovered roosting, works would need to cease immediately (once made safe) until a bat licence was in place to continue works. Where practicable to do so, any bats discovered would be left or returned to the building. Where not feasible because the roost feature was no longer suitable, the bat would be moved to a bat box (further details below).

Alternative roost provision

Alternative bat roosts should be provided for by the erection of bat boxes suitable for common pipistrelle bats within the building. Bat boxes should be positioned on south facing aspects at least 4m above the ground, and ideally as high up as possible beneath the eaves of the building. Locations should be sheltered from inclement weather and be in direct sunlight for at least part of the day. A range of suitable bat boxes are available commercially (for example, see NHBS <https://www.nhbs.com/>). See the Bat Conservation Trust's Bat Box Information Pack for further details on selection and erection of suitable bat boxes⁵. At least one bat box would need to be erected prior to works starting so that in the event of a bat being discovered, it could be placed in the box. The location of the box would need to be suitably far that it would not be disturbed by the construction works.

⁵ Bat Conservation Trust, *Bat Box Information Pack* (n.d.), <https://www.bats.org.uk/our-work/buildings-planning-and-development/bat-boxes/putting-up-your-box>.

APPENDICES

APPENDIX A - POLICY AND LEGISLATION

Protected Species Legislation

Bats

All UK Bats are European Protected Species (EPS), protected by law. They are listed in Annexes II and IV of the European Habitats Directive and receive full protection under The Conservation of Species and Habitats Regulations 2017. This makes it an offence to:

- deliberately capture, injure or kill any European Protected Species (EPS)
- to deliberately disturb any European Protected Species (EPS);
- to damage or destroy a breeding site or place of rest or shelter used by any European Protected Species (EPS).

The Wildlife and Countryside Act 1981 (as amended) adds further protection by making it an offence to intentionally or recklessly⁶ disturb a bat while it is occupying a structure or place which it uses for shelter or protection, or to obstruct access to any structure or place the species uses for shelter or protection.

Nesting birds

Under The Wildlife and Countryside Act 1981 (as amended), all wild birds, their nests and eggs are protected. It is an offence to:

- intentionally kill, injure or take wild birds
- intentionally take, damage or destroy a wild bird's nest while it's being used or built
- intentionally take or destroy a wild bird's egg
- possess, control or transport live or dead wild birds, or parts of them, or their eggs
- sell wild birds or put them on display for sale
- use prohibited methods to kill or take wild birds

Some birds are listed on Schedule 1 of the Act, giving them extra legal protection. For these bird species it is also an offence to do the following, either intentionally or by not taking enough care:

- disturb them while they're nesting, building a nest, in or near a nest that contains their young

⁶ Under the Countryside and Rights of Way Act 2000 (CROW Act) extended the protection to cover reckless damage or disturbance

- disturb their dependent young

National Planning Policy Framework (NPPF)⁷

The National Planning Policy Framework sets out the government's planning policies for England and how these are expected to be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. Planning law requires that applications for planning permission be determined in accordance with the development plan. The framework includes key paragraphs relating to the natural environment and how it should be considered in the planning context.

Government Circular ODPM 06/2005 Biodiversity and Geological Conservation⁸ (England only)

This Circular provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England.

Part IV - Conservation of Species protected by Law details that the presence of a protected species is a material consideration when considering a development proposal that may result in harm to the species or its habitat and that planning authorities must have regard to species protected under the Habitat Regulations.

It goes on to say that: *it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.*

Natural Environment and Rural Communities (NERC) Act 2006^{9 10}

Section 40 – To conserve biodiversity

Section 40 puts a duty on public authorities to conserve biodiversity when undertaking its duties and functions.

Section 41 – Biodiversity list and Action

⁷ NPPF December 2024 (<https://www.gov.uk/government/publications/national-planning-policy-framework--2>)

⁸ ODPM Circular 06/2005 Office of the Deputy Prime Minister Eland House, Bressenden Place, London SW1E 5DU Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System

⁹ <https://www.legislation.gov.uk/ukpga/2006/16/section/40>

¹⁰ <https://www.legislation.gov.uk/ukpga/2006/16/section/41>

Section 41 requires the Secretary of State *"to publish a list of the living organisms and types of habitat which in the Secretary of State's opinion are of principal importance for the purpose of conserving biodiversity."* They must also *"take such steps as appear to the Secretary of State to be reasonably practicable to further the conservation of the living organisms and types of habitat included in any list published under this section or promote the taking by others of such steps."*

The 2007 lists were superseded by the UK Post-2010 Biodiversity Framework.

APPENDIX B - BAT SUITABILITY AND SURVEY EFFORT

Classifications of suitability are based on those provided within the Bat Conservation Trust Good Practice Survey Guidelines¹⁵, with the table below taken from page 44 of the guidelines.

Table 4.1. Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement.

Potential suitability	Description	
	Roosting habitats in structures	Potential flight-paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible ^a	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.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
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 ^b and/or suitable surrounding habitat to be used on a regular basis or by larger numbers 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 ^c).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions ^b and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions ^b and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.
^a Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute). ^b For example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance. ^c Evidence from the Netherlands shows mass swarming events of common pipistrelle bats in the autumn followed by mass hibernation in a diverse range of building types in urban environments (Korsten <i>et al.</i>, 2016 and Jansen <i>et al.</i>, 2022). Common pipistrelle swarming has been observed in the UK (Bell, 2022 and Tomlinson, 2020) and winter hibernation of numbers of this species has been detected at Seaton Delaval Hall in Northumberland (National Trust, 2018). This phenomenon requires some research in the UK, but ecologists should be aware of the potential for larger numbers of this species to be present during the autumn and winter in prominent buildings in the landscape, urban or otherwise.		

¹⁵ Collins, J. (ed) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). Bat Conservation Trust, London

The classification of the suitability relates to the level of further survey recommended based on guidance within the Bat Conservation Trust Good Practice Survey Guidelines, with the table below taken from page 71 of the Guidelines (Collins, 2023).

Table 7.2. Recommended minimum number of survey visits for presence/absence surveys to give confidence in a negative result for structures (also recommended for trees but unlikely to give confidence in a negative result).

Low roost suitability or PRF-I	Moderate roost suitability	High roost suitability or PRF-M
One survey visit. One dusk emergence survey ^a (structures). No further surveys required (trees).	Two separate dusk emergence survey visits ^b .	Three separate dusk emergence survey visits ^b .
a Structures that have been categorised as low potential can be problematic and the number of surveys required should be judged on a case-by-case basis (see para 5.2.44). In some cases, more than one survey may be needed, particularly where there are several buildings in this category. b Multiple survey visits should be spread out to sample as much of the recommended survey period (see Table 7.1) as possible; it is recommended that surveys are spaced at least three weeks apart, preferably more.		