

UPDATE BAT SURVEY RESULTS REPORT

10 Gun Street, Reading, RG1 2JR

May 2026 | FN22-024C | VERSION 3 | KH



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CONTENTS

Contents.....	4
Executive summary	6
1. Introduction.....	7
1.1 Background to commission.....	7
1.2 Site location & description	7
1.3 Project description.....	7
1.4 Report Objectives	7
2. Methodology.....	8
2.1 Update desk study (bats only)	8
2.2 Update preliminary roost assessment (PRA).....	8
2.3 Update bat emergence surveys	8
2.4 Limitations	9
3. Results.....	10
3.1 Update desk study (bats only)	10
3.2 Update preliminary roost assessment (PRA).....	10
3.2.1 Summary	10
3.2.2 Building description	11
3.2.2.1 North elevation.....	11
3.2.2.2 South elevation	11
3.2.2.3 Building interior.....	12
3.2.3 Site location.....	13
3.2.3.1 Culvert	14
3.3 Update bat emergence surveys	19
3.3.1 Bat activity	20
3.3.1.1 Survey 1: 05/06/2025.....	20
3.3.1.2 Survey 2: 07/07/2025.....	20
3.3.1.3 Survey 3: 11/05/2026.....	21
4. Discussion and recommendations	24
4.1 Mitigation strategy	25
5. Conclusions	27

APPENDICES	28
Appendix A - Policy and Legislation	29
Appendix B - Bat Suitability.....	32

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 three years ago, update surveys for bats were required to inform the licence application.

No changes were recorded to the building during the update Preliminary Roost Assessment (PRA) in 2025 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. No bats were found to emerge from the building during the update emergence surveys.

As no bats were recorded in update surveys in 2025 and 2026, and because the 2022 results are now out of date, there is no basis on which to apply for a licence. 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. This is considered to be the most pragmatic course of action given that it is no longer possible to apply for a licence with the data available and given the urgency of works needed. The building is in a poor state of repair and urgently requires work to rectify it.

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 three 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 on 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 (Defra) 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 assist with the licence application and to characterise any roosts present. The update emergence surveys were undertaken with reference to the Bat Conservation Trust Good Practice Guidelines². As the building was previously identified as a confirmed roost and found to have high bat roost potential, three emergence surveys were undertaken.

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>.

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. Notes were made of any emergencies that were observed, as well as of general bat activity around the building.

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 ultrasonic bat detector (Anabat Scout or Echometer Touch) to aid in the identification of bats. The surveyor to the south of the building was also equipped with an infra-red camera (Canon XA40) to aid in the sighting of bats. The surveyor to the north of the building was not equipped with an infra-red camera due to health and safety considerations as this location is on a publicly accessible street; however, this side of the building is well lit by existing streetlights meaning visibility remained good throughout the survey and so this is not considered to limit the survey.

2.4 LIMITATIONS

During the third survey temperatures were slightly below the recommended temperature for bat surveys. However actively commuting and foraging bats were still observed during the survey with activity levels comparable to other surveys, so this is not considered to be a significant limitation to the survey results.

During the third scaffolding had also been erected to the rear of the building which obstructed the view of some PRFs. However not bats were observed emerging from within scaffolded areas or flying around the scaffolding, so it considered unlikely that any emergencies were missed due to this limitation.

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 ASSESSMENT (PRA)

3.2.1 Summary

No changes were recorded to the building between the previous PRA in 2022 and the update PRA in 2025. No signs of roosting bats were recorded during the update PRA survey. At the time of the survey the building was still unused and remained in a poor state of repair. The previously identified PRFs remained present and no new PRFs were identified during the update PRA survey. The building overall was assessed as having High roost potential. Changes to the building were recorded in 2026 and are discussed further in Section 3.2.4.

3.2.2 Building description

The site boundary comprises an unused commercial building and associated yard area to the rear. The building was formally used as office space but has been predominantly disused for a number of years, other than for informal storage, and is in need of some refurbishment. The majority of the building pre-dates the mid-twentieth century with more recent extensions to the south having now been demolished. It comprises a three storey, brick-built, terraced property with elevations to the north and south. The pitched roof comprises clay tiles and a loft is present, accessible by the main stairwell. Photographs of the building are provided in Table 3.3.

3.2.2.1 North elevation

The north elevation is constructed from brick with lintels above the first and second storeys. The ground floor comprises two, large windows (one being a bay window) and a door with some ornamental, stone casing around them. The first and second floors contain four sash windows with wooden frames. Guttering and a cable are also attached to the exterior.

The northern elevation is in good overall condition with no apparent gaps or crevices within the brickwork. However, the age and style of the property means there is potential for small gaps and crevices around lintels and window frames that could have the potential to support small roosts suitable for individual or low numbers of bats.

The same is true of the roof tiles, which appear to be in overall good condition but are of an age and style that they are irregularly shaped and therefore provide small gaps that have the potential to support small roosts suitable for individual or low numbers of bats.

The northern aspect makes it less suitable for bat roosts which typically favour a more southerly aspect. It is also well lit by street lights which further reduce its suitability as a bat roost.

3.2.2.2 South elevation

The south elevation comprises the exterior of the original building with signs of a number of subsequent revisions. The original southern side of the pitched roof is present across the full length of the three-storey elevation. A similar, smaller section of pitched roof is present on a two-storey section of the building that extends southwards and has a tall, brick chimney upon it.

A square tower also extends south from the original elevation which houses a stairwell. It comprises brick at the ground floor level and is rendered above. The remaining external wall is part exposed brickwork and part rendered but also includes exposed interior features, such as interior doorways, where extensions have been removed. A large amount of damage is visible, including large gaps in the brickwork and a large gap at the eastern end of the roof eaves. Some exposed features are covered in plastic sheeting. There are a number of windows present which are typically boarded internally with glass panes missing or broken.

The southern elevation provides a number of PRF's and access points into the building. The sections of tiled roof are similar to the northern elevation and provide a number of small gaps suitable for individual or small numbers of bats. The damaged section of roof provides access into the roof void and potentially into a void between the loft floor (which is boarded) and the ceiling below.

The damaged sections of wall provide small roosting opportunities within small gaps and cracks but also provide potential access points into larger voids and into the interior of the building. The broken windows also provide potential access into the interior of the building where boarding behind is either missing or in poor condition.

3.2.2.3 Building interior

The building comprises three-storeys plus a loft space and basement. The interior is predominantly disused but is used by the adjacent Purple Turtle bar to store materials which are mostly confined to the ground floor.

Loft space

The loft is accessible by the main staircase and the floor is fully boarded but the space is currently unused. It is constructed by a timber 'A' frame which is lined behind and generally in good condition. Brick walls make up the gable ends and large gaps are present at the top at each end of the loft providing connectivity to the adjoining properties.

The damage identified to the exterior provides a large access point in the south east corner of the roof and a further, small, access point was identified on the southern side, further west. This gap was full of cobwebs and unlikely to have been recently used by bats.

The loft void itself provided a suitable feature for large numbers of bats to roost. The wooden frame appeared to be in good condition and well connected so provided limited gaps or crevices for bats to roost within.

The floor and vertical beams were thoroughly searched and no bat droppings or bat feeding remains were found to be present. Rat droppings were present throughout.

Ground floor, first floor, and second floor

The main interior of the building was previously used as office space and was divided into a number of rooms used for that purpose, plus toilet and kitchen areas. The majority of these areas were well lit by the large windows in the north elevation and no areas were free from daylight, except for an internal kitchen area on the first floor that was closed off to the rest of the interior.

The majority of the interior walls and ceilings were intact and where there was damage this was superficial. The exception to this was the areas of damage already noted on the southern exterior where a number of gaps were present which opened up into the interior of the building. There were also a small number of inspection hatches that had been created in the ceiling which provided access to the space above the ceiling.

The overall suitability of the interior as a roost space was low due to it being well lit and having relatively few voids, cracks or crevices for bats to utilise. However, a single bat dropping was identified behind a board leaning against a door on the ground floor during the previous PRA of the Site, in 2022. The dropping was old and was characteristic of a pipistrelle bat dropping. The board was considered a sub-optimal roosting location and the absence of other signs of bat presence suggested its use had been minimal.

No signs of bat presence were identified in 2025 despite all floors and surfaces being thoroughly checked. Rat droppings were present. There is potential for other stored materials within the interior to provide similar sub-optimal roosting conditions to the board, although no signs of bats using other materials were identified.

Basement

The basement had an overall smaller footprint than the rest of the building. It comprised two sections partially separated by an internal wall. The walls were constructed from brick with some timber beams present. Electrical equipment was present on one wall. The ceiling had partially collapsed in places revealing a low void above.

The basement void itself provided a suitable feature for large numbers of bats to roost and the void above the ceiling provided an additional opportunity. The walls were intact and provided no crevices or gaps that bats could utilise. The electrical equipment was of metal construction and therefore any small gaps behind it was generally considered unsuitable as a roost site.

All surfaces were thoroughly searched for signs of bat activity and none were found. Rat droppings were present throughout. The basement is a suitable location for a hibernation roost although no signs to suggest its use as such were identified.

3.2.3 Site location

The area to the south of the building predominantly comprised scattered vegetation where species such as nettle *Urtica dioica*, buddleia *Buddleja davidii* and hedge bindweed *Calystegia sepium* had established over rubble and bare ground left following the demolition of the former extensions. An area of hard standing was present at the southern end of the site which was used to store materials. A large amount of debris and materials were also present throughout the vegetated area.

The yard provided no opportunities for bats to roost but the vegetation was likely to support a sufficient number of night flying insects to make it of some value as a foraging resource to bats. The yard was not well connected to other areas of suitable habitat but the graveyard of St. Mary's Church was only separated from it by Gun Street and the buildings that line it. The churchyard comprised grassland and mature trees which provided suitable habitat for foraging bats but was also isolated from larger areas of suitable habitat.

The Holy Brook Stream also provided a limited foraging resource immediately east of the site. Due to it being in a culvert for most its length, and the absence of a natural bank profile or

significant areas of vegetation, the culvert was considered relatively poor habitat for foraging bats.

Overall, the habitat value of the site for foraging and commuting was Low.

3.2.3.1 Culvert

The culvert that runs beneath the site was assessed from the point it exits the culvert immediately east of the site boundary. The culvert is constructed from brick and is believed to have been first culverted in the 19th Century. The brickwork around the culvert exit and the brick walls that formed the channel sides after the culvert appeared old but were generally intact and well rendered. No obvious gaps or cracks that could provide bat roost potential were evident. The full length of the culvert below the site could not be accessed so it is unknown what the condition of the brickwork is for the full length.

At the time of both surveys (2022 and 2025), the water in the channel was shallow and slow flowing. The top of the culvert was approximately 1m above the water level but this distance is likely to be less when water levels are higher. This would further limit opportunities for bats to roost.

A summary of the PRF's and potential access points identified during the survey are provided in Table 3.2 along with photos showing their location.

Table 3.2: Summary of Potential Roost Features and access points

Northern elevation	
	
Feature	Potential value to bats

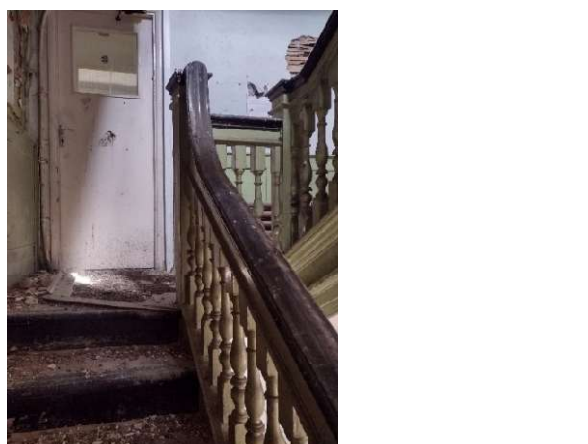
Various locations - Potential small gaps and crevices around lintels and window frames and beneath roof tiles.	Potential roost space for individual or small numbers of crevice dwelling bats.
A - Slightly ajar windows.	Access into the interior of the building.

Southern elevation



Feature	Potential value to bats
A - Damaged walls/brickwork resulting from removal of extensions.	Potential roost space for individual or small numbers of crevice dwelling bats. Potential access to larger voids behind brickwork/ created by damage Access into the interior of the building.
B - Broken or missing window panes.	Access into the interior of the building.

C - Damage to roof in SE corner.	Potential roost space for individual or small numbers of crevice dwelling bats. Access into the interior of the building.
D - Potential small gaps and crevices beneath roof tiles.	Potential roost space for individual or small numbers of crevice dwelling bats.
E – Interior doors exposed	Access into the interior of the building.
Loft space	
	
Feature	Potential value to bats
Loft void	Potential roost space for large numbers of bats. No signs of bats present.
Wooden frame	Potential roost space for individual or small numbers of crevice dwelling bats. No signs of bats present.
Ground floor, first floor and second floor	

	
	
Feature	Potential value to bats
Limited shelter behind stored materials, such as the board on the ground floor.	Limited potential for individual or small numbers of bats. A single bat dropping was found attached to one board in 2022.
Inspection hatches.	Potential roost space for small to medium numbers of bats. No signs of bat use were identified.
Basement	



Feature

Potential value to bats

Basement void.

Potential roost space for large numbers of bats, including as hibernation roost. No signs of bats present.

Ceiling void.

Potential roost space for small to medium numbers of bats. No signs of bat use were identified. No signs of bats present.

Yard



Feature

Potential value to bats

Vegetated yard in an urban area with connectivity to foraging habitat in nearby graveyard.

No roost potential but provides some opportunity for foraging bats.

Culvert

	
<i>Photo from 2022 visit</i>	
Feature	Potential value to bats
Brick culvert.	Roosting potential deemed to be limited due to intact brickwork and limitation of water level. However, cannot be completely ruled out as full length of culvert inaccessible.

3.2.4 2026 changes

During the emergence survey in May 2026 it was observed that scaffolding had been erected to rear of the building on the southern elevation (see Table 3.4). It is understood from client communications that this was done in order carry out essential repair works to the listed building, preventing further decay and rainwater ingress and to block the holes where pigeons were entering the building. There was a significant pigeon and rat infestation which was exacerbating decay and causing health and safety issues internally.

The full extent of the works could not be determined safely from the ground but it is likely that the number of PRFs would have reduced and the presence of scaffolding may have reduced the suitability of the building for roosting bats.

3.3 UPDATE BAT EMERGENCE SURVEYS

The results of the emergence surveys are summarised in Table 3.3, and the surveyor positions are shown on Figure 3.1. Screen shots of the infra-red camera for position 2 at the darkest point of the survey for both surveys is shown in Table 3.4.

No bats were recorded emerging from the building.

Table 3.3: Emergence survey results

Date	Surveyors	Time	Weather	Sunset	Emergences
05/06/25	Jessica Dickens Grace Rawlinson	21:00 – 22:45	Temp: 14°C Wind: 9mph Cloud: 8/8 Rain: None	21:16	None
07/07/25	Kai Hayes Alex Donnelley	21:06 – 22:51	Temp: 18°C Wind: 10mph Cloud: 0/8 Rain: None	21:21	None
11/05/26	Kai Hayes Helen Duriez	20:27 – 22:12	Temp: 8°C Wind: 5mph Cloud: 0/8 Rain: None	20:42	None

3.3.1 Bat activity

A summary of the levels of bat activity recorded during the emergence surveys is provided below.

3.3.1.1 Survey 1: 05/06/2025

The surveyor positioned to the north of the building recorded common pipistrelle foraging from 21:37, 21 minutes after sunset until 21:58 in the graveyard to the north of the building. No bats were observed around the building frontage or flying over the building.

The surveyor positioned to the south of the building recorded one noctule contact at 21:53, 37 minutes after sunset. The bat was heard but not seen. No other bat activity was recorded during the survey and no bats were observed foraging or commuting on the site.

3.3.1.2 Survey 2: 07/07/2025

The surveyor positioned to the north of the building again recorded regular foraging by common pipistrelle in the graveyard to the north of the building from 21:44, 23 minutes after sunset until 22:49. A noctule was also recorded once at 21:45.

The surveyor positioned to the south of the building recorded two periods of common pipistrelle activity, the first from 21:53, 32 minutes after sunset, until 22:08 and again from 22:18 until 22:21. During each period one common pipistrelle was observed foraging around

the yard in front of the building. Soprano pipistrelle was also recorded commuting twice at 22:28, 7 minutes after sunset, and at 22:30.

3.3.1.3 Survey 3: 11/05/2026

The surveyor positioned to the north of the building recorded regular foraging by common pipistrelle and soprano pipistrelle in the graveyard to the north of the building from 21:07 until 21:39.

The surveyor positioned to the south of the building recorded regular foraging by common pipistrelle and soprano pipistrelle in the courtyard from 21:06 until 21:40. Another brief period of foraging by common pipistrelle occurred at 22:00. Occasional noctule activity was recoded.

Table 3.4: Screenshots of infra-red cameras at position 2 for all surveys

Emergence survey 1: 05/06/25 at 22:45	
Emergence survey 2: 07/07/25 at 22:51	

**Emergence
survey 3:
11/05/26
at 22:21**



Figure 3.1: Bat Emergence Survey Positions



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.

The overall levels of bat activity recorded on the site was low and the site offers Low value habitat for foraging and commuting. Both of the building elevations are well lit and the site is noisy at night. The wider area around the site is predominantly very low value habitat for bats comprising roads and buildings with very limited green space, with the exception of the church grounds to the north, which are also isolated from other areas of suitable habitat.

Whilst the building retains suitable roost features, the overall low levels of bat activity and absence of bat emergences during surveys undertaken during the optimal survey period indicate the building is not being used as a bat roost.

As no bats were recorded during the update surveys in 2025 and 2026, and because the 2022 results are now out of date, there is no 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.**"*

This report demonstrates that update surveys undertaken of the Site as detailed herein have not found any evidence that the building is currently being used as a bat roost and a licence for development works affecting bats is not required.

Whilst no bats were found to be currently using the building as a roost, there remains a chance that the building could be used opportunistically by bats, due to the features present and because they have roosted in the building previously. Therefore, a precautionary approach to the redevelopment of the site should be taken. PRF's remain present and 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.

This is considered to be the most pragmatic course of action given that it is no longer possible to apply for a licence with the data available and given the urgency of works needed. The building is in a poor state of repair and urgently requires work to rectify it.

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

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

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

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>.

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. CONCLUSIONS

The update bat survey undertaken at 10 Gun Street found that the building continues to be in a poor state of repair and continues to provide a variety of roosting opportunities for bats. These are predominantly on the southern elevation and result from works undertaken to remove previous extensions which has left sections of damaged brickwork and tiles that bats could either find crevices to roost within or gain access into the interior of the building. The overall age and style of the building also means there are potential gaps around window frames, lintels and tiles which could provide further roosting opportunities.

Whilst suitable roost features remain present, the update surveys found overall levels of bat activity around the building to be very low and no evidence of roosting bats was found. The surveys were undertaken during the optimal survey period when bats are most active meaning confidence in the results is high.

The building was previously found to support a low number of common pipistrelle day roosts. Bats were not found to be currently roosting in the building meaning a bat licence is not required but precautionary measures should be taken due to the risk of opportunistic use by bats. The measures set out in the report seek to minimise the risk of any harm occurring to bats or their roosts.

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

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*	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