



Land at the Old Creamery
Bat Activity Survey & Assessment
For Mr A Gwynne

13th August 2026

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1. Introduction

1.1 Commission

Ellendale Environmental Limited was commissioned by LPC (Trull) Ltd., on behalf of their client Mr A Gwynne, to undertake a bat survey of a former office building ('the target building') in support of a planning application for a proposed karting track ('the proposed development') on an area of land at The Old Creamery, Cirencester Road, Down Ampey, Cirencester, GL7 5QF ('the site'). The target building will be repaired and repurposed for the associated office/reception facilities and workshops.

1.2 Site Details

The site and target building are located approximately 7km to the south-east of Cirencester, 2km south-east of the centre of South Cerney village, and 10km to the north-west of Swindon, at OS grid reference SU 08003 96706.

1.3 Bat Conservation

British bats

There are 18 species of bats resident in Britain, 17 of which are known to breed. These are from two families, namely the Rhinolophidae (the two horseshoe bat species) and the 15 species of vesper/evening bats (the Vespertilionidae). All British bats are insectivorous and locate their prey using ultrasonic calls through a biological system known as echolocation.

During summer months, female bats form nursery colonies in trees and buildings, where they raise infants. In the winter, males and females hibernate in trees, buildings and underground structures.

Conservation status of British bats

The general consensus in Britain and Europe is that virtually all bat species are declining and are vulnerable. Our understanding of population status is poor, as there is very little historical data for most bat species.



Certain species, such as the horseshoe bat, are better understood and have well documented contractions in range and population size.

Given this general picture of decline, the UK Government (within the UK Biodiversity Action Plan) has designated eight species of bats as priority species (these being soprano pipistrelle, common pipistrelle (Wales only) greater and lesser horseshoe bats, barbastelle, Bechstein's, noctule and brown long-eared bat). These plans provide an action pathway whereby the maintenance and restoration of former population levels are envisaged.

Legal status of British bats

All bats and their roosts in England were originally protected under the Wildlife & Countryside Act 1981. Subsequent amendments to the legislation for England (and Wales) has removed bats from most of the provisions of the Act; however, it remains an offence to:

- Intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for shelter or protection; and/or
- Intentionally or recklessly obstruct access to any structure or place that a bat uses for shelter or protection.

All British bat species are listed in Annex IV of the EC Habitats Directive and are fully protected through The Conservation (Natural Habitats, &c.) Regulations 1994. All bat species found in England are classed as European protected species. They receive full protection under the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended).

These regulations make it an offence to:

- Deliberately capture, injure, or kill a bat;
- Harass a bat or group of bats;
- Disturb a bat in a roost (any structure or place it uses for shelter or protection);
- Disturb a bat while it is rearing or otherwise caring for its young
- Obstruct access to a bat roost or otherwise deny an animal use of a roost;



- Disturb a bat in a manner or in circumstances likely to significantly affect the local distribution or abundance of the species; and/or
- Disturb a bat while it is migrating or hibernating.

The legislation, although not strictly affording protection to foraging grounds, does protect bat roost sites. Bat roosts are protected at all times of the year, regardless of whether or not bats are present at the time.

It's also an offence to:

- Damage or destroy a breeding site or resting place of such an animal (whether or not deliberately or recklessly); and/or
- Keep, transport, sell or exchange, or offer for sale or exchange any wild bat (or any part or derivative of one) obtained after 10th June 1994.

Where development is proposed that would result in an offence under the Habitats and Species Regulations, a European Protected Species (EPS) licence needs to be granted by Natural England (NE) to permit an act that would otherwise be unlawful. This provides for a specific derogation from the legislation, to prevent a legal infringement occurring.

To obtain an EPS licence for development it must be demonstrated that the purpose of the act to be licensed is for:

- *"Preserving public health or public safety or other imperative reasons of overriding public interest including those of social or economic nature and beneficial consequences of primary importance for the environment"* (Regulation 55(2)(e)).

In addition, NE will not grant an EPS licence unless they are satisfied that:

- *"There is no satisfactory alternative"* (Regulation 55(9)(a)); and
- *"The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range"* (Regulation 55(9)(b)).



2. Methodology

2.1 Overview

Survey work undertaken in relation to a proposed development needs to be conducted under a scientific/conservation licence issued by, in this case, NE. The work is normally conducted by an environmental consultant and they will advise on the necessary course of further action with respect to licences, mitigation and compensation measures.

A number of recognised survey techniques are available to the consultant, such as:

- Natural England guidelines (A.J. Mitchell-Jones [2004], *Bat Mitigation Guidelines*, English Nature. ISBN 1 85716 781 3), which provide generic technical advice on bat mitigation; and
- Hundt L (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines*, 4th Edition, Bat Conservation Trust, London. ISBN-13: 978-1-872745-96-1.

For works which may impact bats, the developer must:

- Demonstrate that adequate surveys have been undertaken to establish the presence or absence of bats, to predict the potential impact on them, their resting sites or breeding roosts;
- Bring proposals forward that will integrate provision for bats into any design that will compensate and mitigate for any impact (if bats or their roosts are discovered); and
- Provide sufficient survey information that will support a licence application under the Habitats Directive should bats be discovered.

Where bat species are using a site, it will be necessary to mitigate the impacts of the development upon the population(s). These would include measures that remove or reduce any damaging effects on the animals or their roosts.



In most cases a package of compensation measures will be required to accommodate any loss of breeding or resting-places, and the timing of works will need to be synchronised with the life-cycles of the effected species.

This collective package of mitigation and compensation measures should allow the conservation status of the animals to be at least maintained. With careful thought, the conservation status may even be enhanced. This is usually most easily achieved by early ecological input into the project.

In the case of sites where bats are present, a development licence from NE will be required to conduct works affecting bats.

2.2 Bat Survey Licence

The activity survey was led by Christopher Parsons, Associate Ecologist at Ellendale Environmental. Christopher holds a bat survey licence (Bat Survey Class Licence CL18 (Bat Survey Level 2), registration number 2025-85808-CL18-BAT), with respect to the Conservation Regulations 1994. The licence is valid for all counties of England, until 31st December 2026. Christopher has over 10 years' professional experience of undertaking ecological surveys and working with bat species across the UK.

The survey was assisted by Douglas Fraser, Consultant Ecologist at Ellendale Environmental. Douglas is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and has over six years' of environment sector experience, including bat emergence and re-entry surveys (BERS) and PRAs.

2.3 Survey Objectives

On the basis of the brief provided by the client, Ellendale Environmental conducted survey work to fulfil the following needs:

- Obtain baseline information on the habitat features suitable for bat species;
- Determine the presence/likely absence of bat species within the site and any activity at or near the site; and
- Determine the type, extent and pattern of detected usage.



In practice this was achieved by a physical inspection of the target building, a search for live animals and/or other signs indicating their current or previous presence.

2.4 Survey Methodology

1] A physical internal/external inspection of the target building was undertaken on Monday 11th May 2026. The internal and external areas of the building were searched for signs of bats and evidence of them roosting.

Table 1: Survey weather conditions for physical survey

SURVEY DATE	TEMPERATURE (°C)	WIND SPEED (MPH)	CLOUD COVER/ PRECIPITATION
11/05/26	16.5	Avg. 0.2 Max. 2.1	80% cloud cover, overcast & raining, with a sunny spell

All suitable features were assessed externally and internally. A CLU-10 searchlight was used to search dark areas. The physical search included a search for live animals and a search for other signs that give an indication of past or present occupancy. In the case of bats, typical indicators include droppings (which are characteristic and can often be speciated), signs of staining, characteristic odours, and accumulations of prey items.

2] One dusk bat emergence/activity bat detector survey was undertaken on Tuesday 23rd June 2026. The dusk survey commenced 30 minutes before sunset (sunset was at approximately 20:30) and completed 90 minutes after sunset, when all bats will normally be expected to have exited their roost sites.

Mini time-expansion bat detectors (PeerSonic) were used to detect bat echolocation calls and identify species where possible. Time-expanded (x10) recordings are made that can be later analysed on bespoke software.

Weather was not a limiting factor in the activity survey. The conditions are summarised in **Table 2**.



Table 2: Survey weather conditions for activity survey

SURVEY DATE	TEMPERATURE (°C)	WIND SPEED (MPH)	CLOUD COVER/ PRECIPITATION
23/06/26	23.6	Avg. 0.0 Max. 0.2	5% cloud cover & dry

2.5 Constraints

The surveys were not restricted, and full access was granted to the target building. Whilst no biological survey can guarantee that all cues and signs of protected or notable species will be recorded, Ellendale Environmental is confident that all key fauna present during the surveys were noted.



3. Results

3.1 Site Description

A daytime physical survey of the target building was undertaken on Monday 11th May 2026, and full access was provided.

The single-storey office building has a tiled pitched roof with symmetrical gable ends and a small flat roof section to the north where there is a doorway. There is PVC guttering, a plastic and metal chimney pot, with timber soffits and fascias. External walls are comprised of brick and concrete blocks, with some areas plastered.

Photograph 1: showing a view of the target building (facing south-west)





There are three external doors, two comprised of wood and one of PVC and glass, and the building has nine windows with a combination of single and double glazing; one of the windows is broken to the south-east. The building has a timber frame and beam structure, and a loft space with mineral wool insulation, visible in some locations inside the building through gaps in the plywood ceiling.

Photograph 2: showing a view of the target building (facing north-east)



3.2 Physical Bat Survey

There are potential access/egress points for bats into the target building through gaps into the roof space from the exterior walls, soffits and fascias, a gap in the chimney stack, ventilation/extraction duct, and a broken window. One of the external timber doors is also off its hinges, along with some of the interior doors. The interior is divided into rooms and has a loft space, with some gaps in the ceiling panelling into the loft space. The interior is mostly sheltered from wind and rain, with no larger gaps that would leave bats exposed.



There is loft insulation, and most rooms retain some heat which could be a suitable temperature for bats. The timber frame and roof structural beams provide some physical locations for bats to roost and cling onto.

Photograph 3: showing roof & loft space with a gap (potential bat access/egress point)



However, no conclusive evidence of bat activity, such as staining or droppings, were found around the interior or exterior of the building. There are some dense cobwebs in parts of the building, but not in all gaps, so it is possible bats (or birds) have used the space.

Overall, the target building was assessed as providing Low Roost Suitability for bats, and one dusk bat activity/emergence survey was recommended to be undertaken during the optimum survey season for bats (which is March to October).



3.3 Bat Activity Survey

The activity survey was conducted on Tuesday 23rd June 2026 during the optimum survey season for bats (March to October). The weather conditions were not limiting and were characterised by steady temperatures above 10°C and light winds.

Each surveyor was located in a static position to cover all aspects of the target building during the survey, as shown on **Figure 1**.

Figure 1: showing the surveyor locations for the activity survey



Dusk survey, 23/06/26

No bats were observed during the survey emerging from the target building, and none were observed foraging and commuting near the building. Overall bat activity in the wider site was low.

The target building is therefore not considered to be a bat roost, and no further surveys are recommended here.



4. Conclusions

4.1 Conclusion

The site is within an existing off-road driving activity centre and comprises an area of bare ground, concrete hardstanding and three buildings including a small office, an agricultural barn and an outbuilding.

A daytime physical survey of the buildings was undertaken on Monday 11th May 2026, and full access was provided for the survey.

One building was identified as providing roost suitability for bats. This target building is a single-storey structure and potential access/egress points for bats were identified through gaps into the roof space from the exterior walls, soffits and fascias, a gap in the chimney stack, ventilation/extraction duct, the broken window and gap through an exterior door. The interior space is mostly sheltered from wind and rain, and the thermal properties of the building could create a suitable temperature for bats, while the timber frame and roof structural beams could be used as roosting locations.

While the physical structure has some potential to support bats, no evidence of bat activity, such as staining or bat droppings, were found around the building interior or exterior. Overall, the target building was assessed as providing Low Roost Suitability for bats, with one dusk bat activity/emergence survey recommended to be undertaken during the optimum survey season for bats (which is March to October).

The dusk activity survey was undertaken on Tuesday 23rd June 2026, in suitable weather conditions. No bats were recorded emerging from the target building and no bats were recorded during the survey.

The target building is therefore assessed as providing Negligible Roost Potential for bats and is not considered to be a bat roost. No further surveys are recommended.



4.2 Suggested Biodiversity Enhancements

The following recommendations are made for biodiversity enhancements at the site, as part of the overall design, which are proportionate with the level of environmental impact from the proposed development:

- Bat boxes could be placed on the renovated building or around the site boundaries, if possible, to create roosting opportunities for bat species.