



- Legend:
- Building 16
 - Retained treelines and hedges
 - Indicative location of bat box to be installed on northern tree line

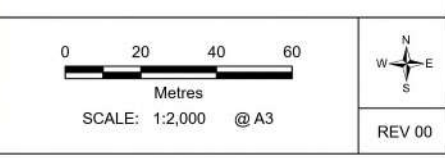


00	19/09/2025	2486598	RG	RS	ED
Rev	Date	Description	Drn	Chk	App

Llanwern Hot Mill



TITLE: Figure 8:
B16 Location of Bat Boxes





- Legend:
- Hot Mill Building
 - Static bat detector
 - Infrared camera
 - Surveyor position

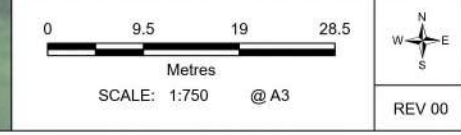


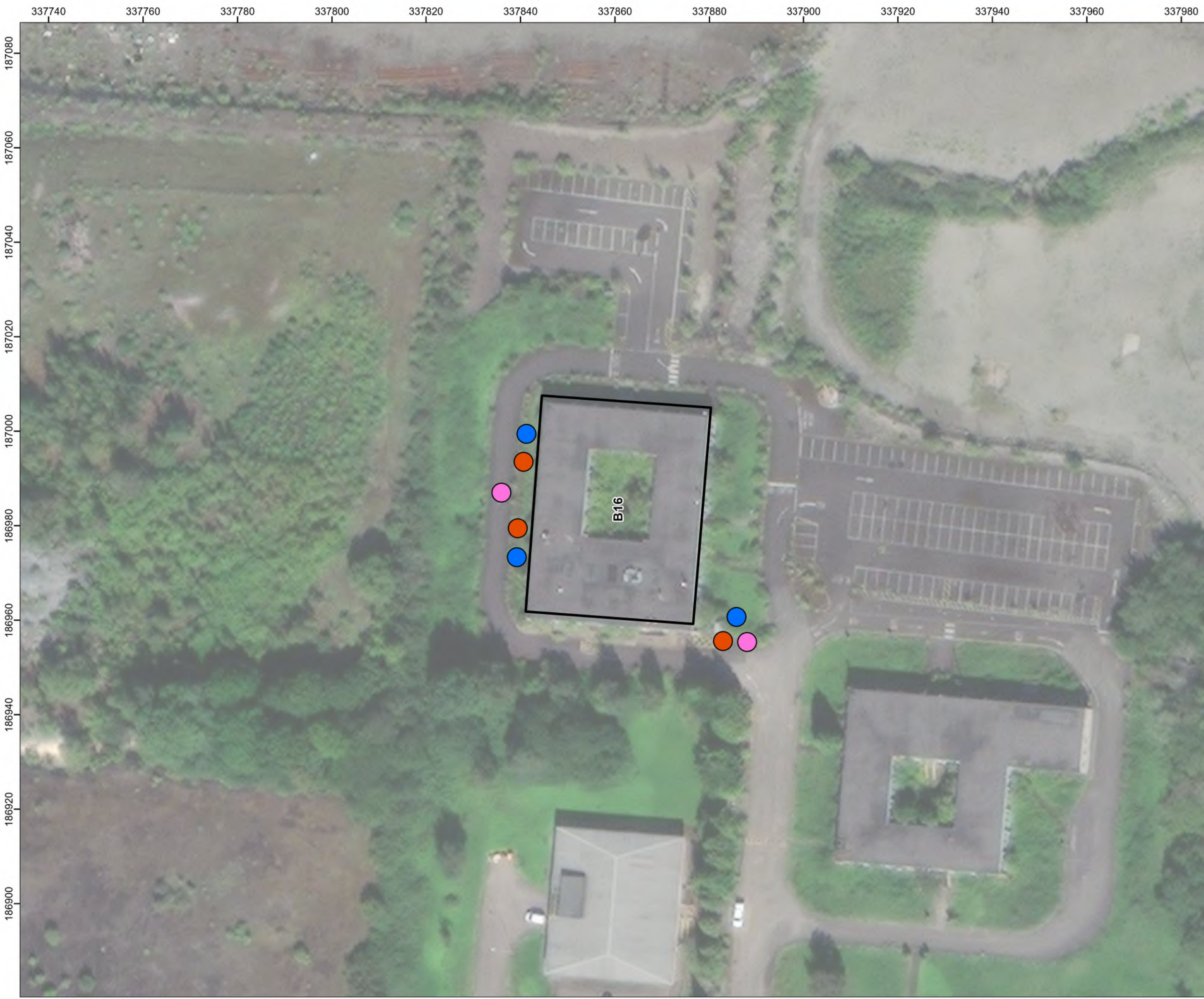
00	19/08/2025	2486598	TG	SP	TC
Rev	Date	Description	Drn	Chk	App

Llanwern Hot Mill



TITLE: Figure 9:
B16 Dusk Survey
Locations of Night Vision Aids
and Bat Detectors - 17.07.2025





- Legend:
- Hot Mill Building
 - Static bat detector
 - Infrared camera
 - Surveyor position

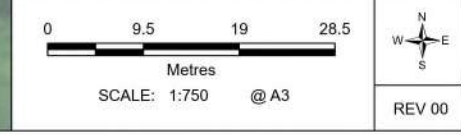


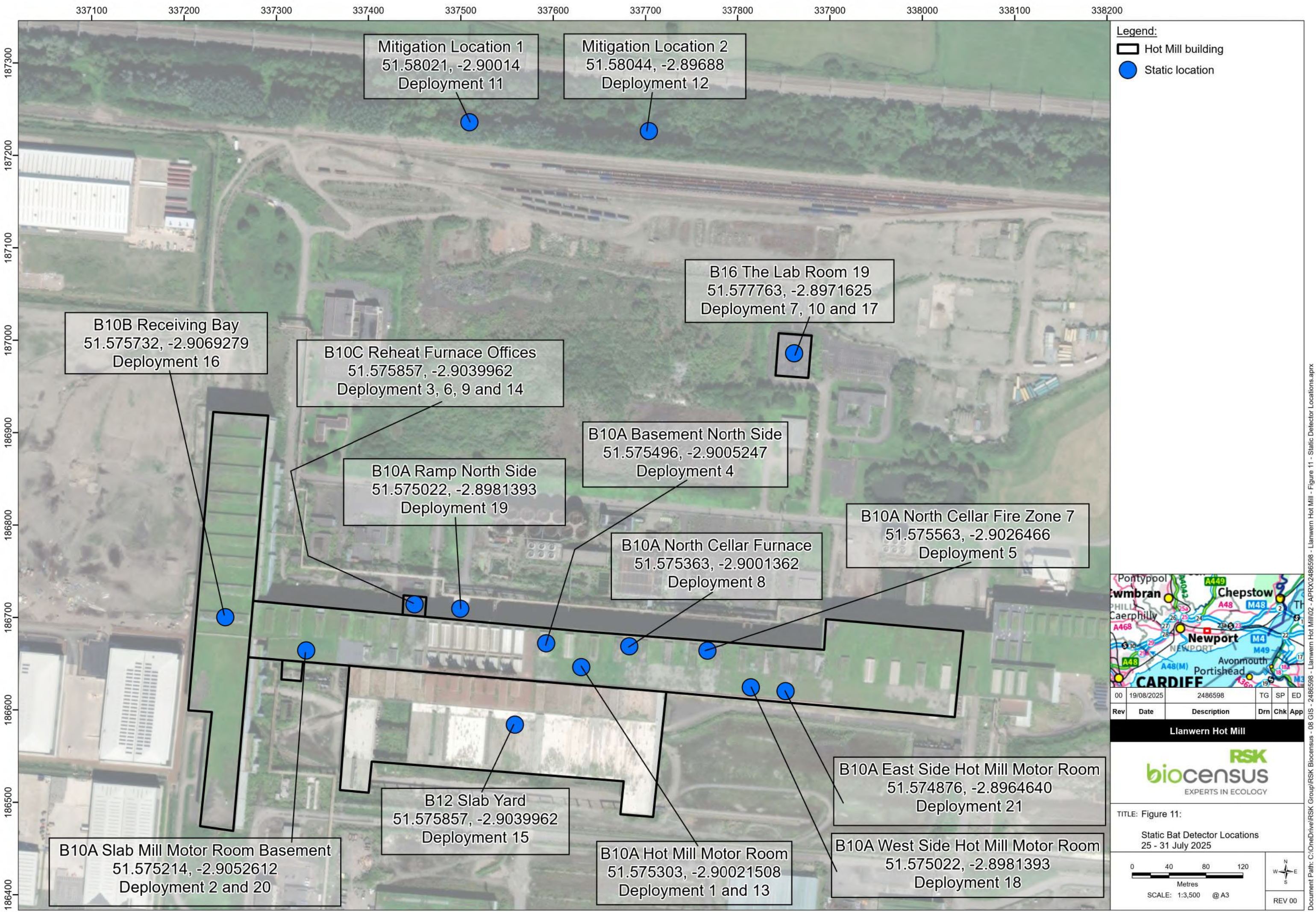
00	19/08/2025	2486598	TG	SP	TC
Rev	Date	Description	Drn	Chk	App

Llanwern Hot Mill



TITLE: Figure 10:
B16 Dusk Survey
Locations of Night Vision Aids
and Bat Detectors - 06.08.2025



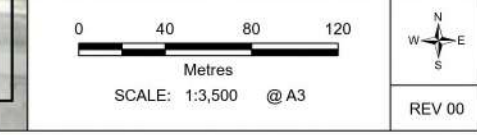


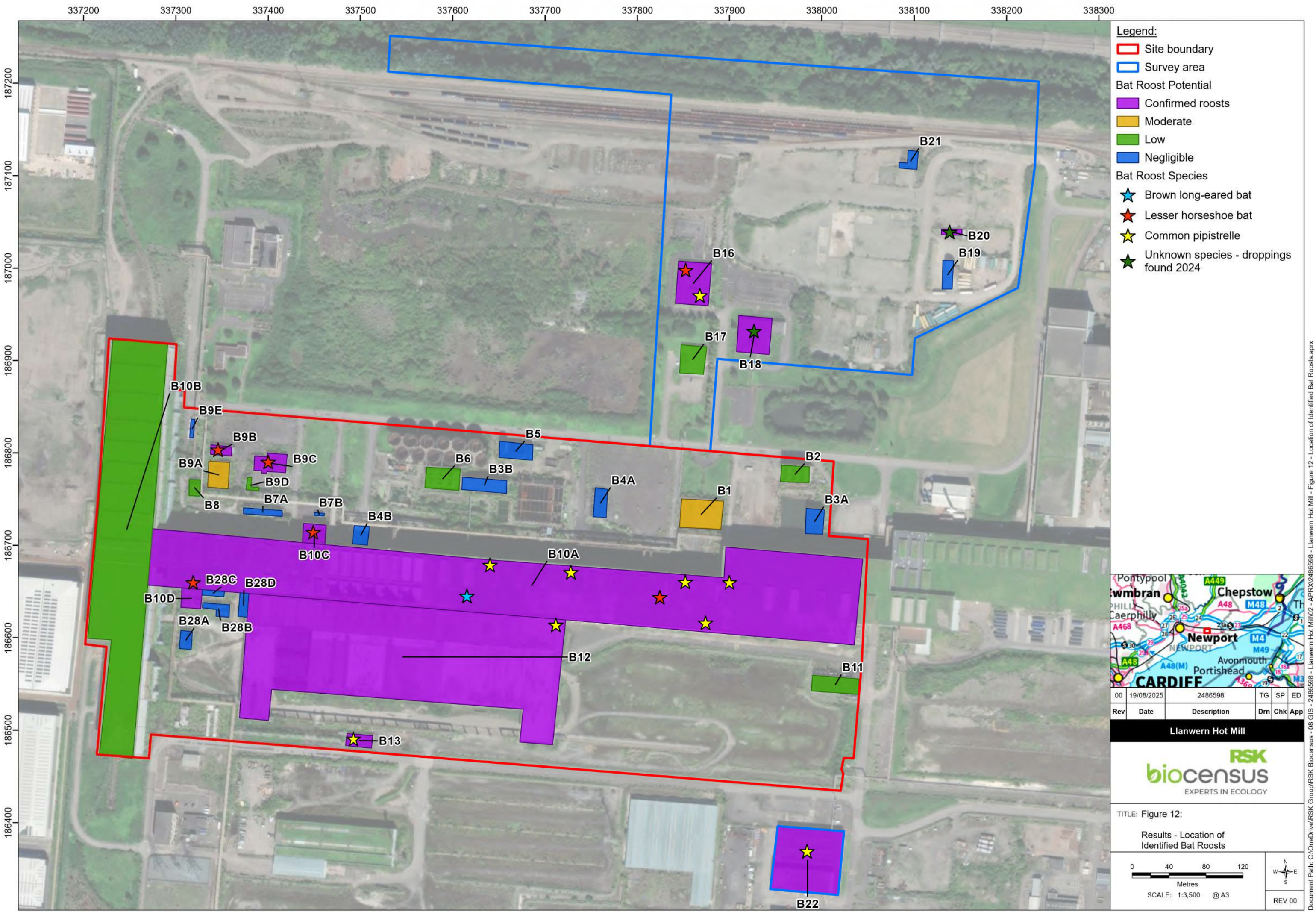
00	19/08/2025	2486598	TG	SP	ED
Rev	Date	Description	Drn	Chk	App

Llanwern Hot Mill



TITLE: Figure 11:
Static Bat Detector Locations
25 - 31 July 2025





Appendix A - Desk Study Information

Table 12. Roosts previously identified within 5 km of the site 2010-2023

Date	Species	Common name	Roost type / bat count	Location	Distance from site (m)
02/07/2019	<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Day roost – 1 bats	Llanwern Park Farm	1697
25/08/2022	<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	24 bats	Glan Llyn: Newport	2553
25/08/2022	<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	82 bats	Glan Llyn: Newport	2553
21/06/2017	<i>Pipistrellus</i>	Pipistrelle Bat species	Maternity	NP18 2BD	2966
06/06/2007	<i>Pipistrellus</i>	Pipistrelle Bat species	Maternity	47 The Caldra: Chepstow Rd: Newport NP18 2LS	3389
16/08/2021	<i>Plecotus auritus</i>	Brown Long-eared Bat	Maternity roost	Pencoed Castle	4088
18/05/2021	<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat	Maternity roost – 35 bats	Pencoed Castle	4088
12/05/2021	<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat	Maternity roost 1000+ droppings	Pencoed Castle	4088
12/02/2021	<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat	Hibernation roost (2 locations)	Pencoed Castle	4088
13/07/2023	<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat	Night roost: multiple in building (3 locations)	Pencoed Castle	4088
16/08/2021	<i>Plecotus auritus</i>	Brown Long-eared Bat	17 bats on emergence, 12 on internal roost check	Pencoed Castle: Llanmartin	4094
16/08/2021	<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat	12 bats	Pencoed Castle: Llanmartin	4094
16/08/2021	<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat	54 bats	Pencoed Castle: Llanmartin	4094
16/06/2017, 27/06/2022	<i>Myotis mystacinus</i>	Whiskered Bat	Maternity roost	Belmont House: Christchurch	4106
01/09/2022	<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Day roost – 6 bats	Bowdens Farm barn	5035
06/05/2014	<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Day roost – 100+ bats	Bulmore House: Great Bulmore	5093
15/06/2017	<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Day roost – 2 bats	Bulmore House	5135
19/06/2008	<i>Pipistrellus pipistrellus</i>	Pipistrelle	86 bats	Cadlicot	5266

24/05/2012, 28/06/2012, 17/07/2012	<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	4/5 bats roosting	Little Caerlicyn: Langstone	5415
04/07/2013	<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Maternity roost	Caerleon Endowed Junior School	5444
08/09/2008 - 09/09/2008	<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat	50-100 fresh droppings found in granary	Upper Pencraig Farm: Llanhennock	5901
02/06/2010	<i>Rhinolophus hipposideros</i>	Lesser Horseshoe Bat	Nursery – 21 bats	N/A	6520

Appendix B - PRA Results

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B1		Single storey brick-built office building with flat bitumen felt roof. Soffit present on all elevations and generally well-sealed however there are sections of damaged soffit on all elevations that would provide access to roof structure on all elevations. Classified as moderate potential as could support multiple bats but unlikely to support roost of high conservation status. Recommend surveys in 2026/2027 ahead of demolition in 2028. No evidence of bats found.	Moderate
B2 and B6		Two almost identical cooling towers. Four storey buildings constructed of interlocking concrete panels. It looks like there are lots of crevice between panels but on close inspection there are no gaps. Potential for bats to get into interior from behind vents on southern elevation. Large industrial fans on flat roof. Low potential overall. Recommend survey in 2026/2027 ahead of demolition. No evidence of bats found.	Low

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B3A		Two storey pump house next to settlement pond. Concrete base concrete base with single skin metal clad walls and flat metal roof. Windows on all elevations at top of walls. Internally open plan, used as old pumping station. Large access on southern elevation and gate on northern. Negligible potential as no potential roost features (PRFs). No evidence of bats found.	Negligible
B3B		Large metal warehouse style building. Machinery inside. No evidence of bats found.	Negligible

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B4A		Single storey brick-built substation. Six open bays on western elevation. Eastern half of building has internal areas, but these are well-sealed. No evidence of bats found.	Negligible
B4B		Single storey brick-built substation with metal extensions on north. Open bays on west with no ceiling. Central interior room (not accessed) on eastern elevation, 15 vent bricks present at approx. 3.5m. May give access to cavity wall (if present). Recommended endoscope inspection initially to see if gap goes anywhere. No evidence of bats found.	Low

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B5		Two storey building with metal cladding. Broken windows on most elevations provide access to internal areas. Internal areas are two rooms with machinery. Both areas are open plan and have light ingress. No evidence of bats found.	Negligible
B7		Two storey brick-built office building with flat felt roof. Open door on north elevation leads into sealed room. Small bit of lifted bitumen on west elevation but doesn't seem to go anywhere. Otherwise well sealed. No evidence of bats found.	Negligible

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B8		Single storey brick-built substation with tarmac felt covered flat roof and two electrical bays on northern and southern elevations. Central section has internal areas. To west of south-west corner is a concrete tunnel leading to a chamber. Inspected via torch and no evidence (not gone inside due to rubbish on floor). Identified as low due to concrete tunnel and chamber on western side. Can be inspected with torch prior to demolition. No evidence of bats found,	Low
B9A		Single storey brick built disused office building. Bitumen flat roof. Metal fascias and uPVC windows. False inner ceilings panels and ceilings are lined internally with wooden cladding. Soffits on all elevations. Open door on northern elevation gives access to interior, as well as open window vents on same elevation. Interior well-lit with no roof voids. Primary PRF is damaged soffit on east and north granting access to gap behind soffits. Moderate potential as could support multiple bats.	Moderate

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B9B		Single storey brick-built disused office building. Bitumen flat roof. Corrugated metal extension and uPVC windows. False inner ceiling panels and ceilings are lined internally with wooden cladding. Generally, well-sealed but has open doors on eastern elevation provides access. Evidence of bats in the form of droppings of a size, shape and consistency for lesser horseshoe were identified within a corridor on the northern side of the building, accessed via an open doorway on the eastern elevation. Approximately 30 droppings were identified concentrated under a light fitting, in the only room in the building not to have a window. Likely day roost of individual or small numbers.	Confirmed
B9C		Single storey brick built disused office building. Bitumen flat roof. Metal facias and uPVC windows. False inner ceiling panels and ceilings are lined internally with wooden cladding. Large ventilation box in the roof areas with open vents. On southern elevation open door leads to electrical cupboard. Two concentrations of lesser horseshoe bat droppings were found inside, one in first room approx. 20, approx. 50 in second room under pipes. Likely day/night roost for individuals or small numbers.	Confirmed

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B9D		Brick built sheds with tarmac flat roof and corrugated metal roof. Two open bays with two internal rooms. One long room couldn't be inspected as double doors wedged with metal. Roof appears to have multiple gaps but dark cupboard at end needs inspection. Full internal inspection recommended before demolition, but no dusk surveys recommended.	Low
B9E		Two disused containers. No evidence of bats found.	Negligible

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B9F		Disused porta cabin with partially collapsed inner ceiling. No evidence of bats found.	Negligible
B10A		Hot Mill – Main Body Complex internal layout with an upstairs main hall (that has one one-storey and two two-storey buildings inside), ground floor 'basement level', and inaccessible service tunnels underground in the southern (horizontally) half. There is an upstairs main hall, a ground floor 'basement level' and underground cellars in the northern (horizontally) half. The footprint of the building covers about 11 hectares. Please see Figure 12 for location of bat roosts.	Confirmed

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B10B		Hot Mill – Discharge Bay Corrugated metal hangar style building with metal cranes, train tracks and machinery inside. No basement or cellars.	Low
B10C		This is an Extension of the Hot Mill building B10A and has internal access into the building. Two storey brick-built office building with bitumen covered flat roof. vidence of bats in the form of droppings of a size, shape and consistency for lesser horseshoe were identified in a kitchenette and a shower room. Approximately 100 droppings were identified with about 50 droppings fresh being found inside the kitchenette and 50 older droppings inside the shower room. In addition, c. 10 chewed peacock and lesser tortoise shell butterfly wings (typical of bat insect prey) were found inside one of the office rooms. The roosting areas are believed to be in the void (c. 1m internal height) above the false inner ceiling panels. These areas could not be fully surveyed due to risk of asbestos. Flight access into the building which is an extension of the Hot	Confirmed roost

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
		Mill is via a broken window but is also internally connected to the main hall of the Hot Mill;	
B10D		Two storey brick-built substation with two large open vents at west and east sides. This building has been disused since the 1970's. This is an extension of the Hot Mill building B10A and has internal doors into the slab mill motor rooms basement with access into the building. Categorised as confirmed roost as internally connected and close proximity to identified bat roost inside slab mill motor rooms basement.	Confirmed
B11		Single storey brick-built electrical substation with flat concrete roof. Open bays on northern elevation with electrical equipment. southern half has internal rooms. Only one PRF seen, hole around wire on western elevation. Recommended endoscope inspection initially to see if gap goes anywhere. No evidence of bats found.	Low

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B12		Hot Mill – Slab Yard Corrugated metal hangar style building with metal cranes and machinery inside. No basement or cellars. Metal cladding walls on east and west with only partial covering on southern elevation. Metal roof covers majority of area. Cranes and steel beams present otherwise internally largely open plan. where Hot Mill and slab yard meet with no internal wall. Furnaces are present with flumes and ash bays which provide some suitable roosting features. Internally there are rooms and tunnels which lead under sections which can't be fully inspected due to asbestos, oil and general unsafe conditions	Confirmed roost
B13		Single storey brick built flat roofed office building that is currently in use. The building has uPVC fascias, windows and doors. This building has false inner ceiling panels and a small ventilation box in the roof areas. One common pipistrelle bat emerged 21:48 during the first dusk survey 22 May 2025. The access point is a gap under the fascia on the North facing side.	Confirmed roost

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B16 (located outside CDM area)		Single storey brick and concrete block building with bitumen covered flat roof. Glass panels make up most of walls. Disused lab with broken windows: two western elevation, two eastern elevation, two facing west in the internal courtyard, and one broken door on eastern elevation. Windows also open with strong winds and are closed again by security. Approx. 100 LHS bat droppings found inside three different rooms with concentrations under open panels (indicating use of void above) and smaller numbers of scattered droppings elsewhere inside Rooms 17, 19 and 20. Rooms are connected via false inner ceiling void and multiple ceiling panels have fallen down.	Confirmed roost
B17 (located outside CDM area)		Single storey flat roofed brick built with tarmac covered flat roof. Medical centre currently in use. Picture from 2024. No evidence of bats found.	Low

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B18 (located outside CDM area)		Single storey brick and concrete block building with tarmac covered flat roof. Glass panels make up most of walls. Generally, well-sealed with one broken window on northern block into courtyard by northwest corner. There is a broken door which is only partly boarded. leading into an electrical cupboard which could not be fully inspected. Some doors are internally locked so couldn't inspect all rooms. There is a partially open door from courtyard into the northern block, with missing ceiling panels above. Previously confirmed as a roost (bat droppings found externally 2024) but no evidence seen (within limitations) 2025.	Confirmed roost
B19 (located outside CDM area)		Large metal warehouse with open doorway at one end. Open to the apex inside. No evidence of bats found.	Negligible

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B20 (located outside CDM area)		Single storey breezeblock with flat bitumen roof and wooden fascias. Disused office building, Bat droppings were found inside offices 2024.	Confirmed roost
B21 (located outside CDM area)		Large metal garage space adjacent to single storey brick building with tiled gable roof and plastic soffit boxes. Currently in use. No evidence of bats found.	Negligible

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B22 (located outside CDM area)		Large, corrugated metal warehouses with pitched corrugated metal roofs with Perspex skylights and an adjacent two storey brick office building with a flat bitumen roof.  Dead common pipistrelle bat found inside 2025. Bat droppings found 2024. Reports of bat activity inside from staff 2024 and 2025.	Confirmed roost
B28A		Single storey brick- built electrical substation with flat roof and five open bays on east elevation. Internal area on west side but sealed with no obvious bat access points. Not internally inspected. No evidence of bats found.	Negligible

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
B28B		Single storey brick- built electrical substation. No roof and metal fences in front. No suitable bat roosting features found. No evidence of bats found.	Negligible
28C		Single storey brick- built electrical substation. Concrete flat roof with six open bays on southern elevation. No evidence of bats found.	Negligible

Building No.	Photograph	Description of building Potential Roost Features and any evidence of bats seen	Categorisation
28D		Single storey brick- built electrical substation. Two bays with metal fencing, No evidence of bats found.	Negligible

Appendix C - End of survey Infra-red camera stills

	
Plate 1 (22/05/2025): B13 Dusk 1 Camera 1	Plate 2 (22/05/2025): B13 Dusk 1 Camera 2
	
Plate 3 (03/07/2025): B13 Dusk 2 Camera 1	Plate 4 (03/07/2025): B13 Dusk 2 Camera 2
	
Plate 5 (03/07/2025): B13 Dusk 2 Camera 3	Plate 6 (17/07/2025): B16 Dusk 1 Camera 1
	
Plate 7 (17/07/2025): B16 Dusk 1 Camera 2	Plate 8 (17/07/2025): B16 Dusk 1 Camera 9

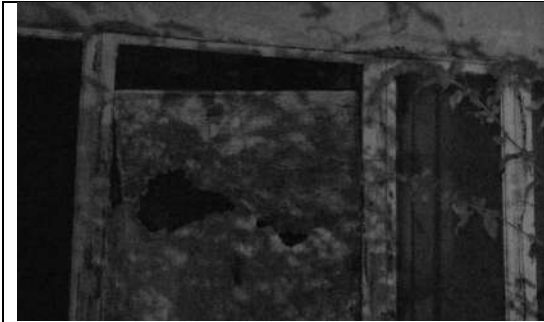


Plate 9 (06/08/2025): B16 Dusk 2 Camera 2



Plate 10 (06/08/2025): B16 Dusk 2 Camera 3



Plate 11 (06/08/2025): B16 Dusk 2 Camera 9



Plate 12 (16/07/2025): B10A Dusk 2 Camera 1



Plate 13 (16/07/2025): B10C Dusk 1 Camera 2



Plate 14 (24/07/2025): B10A Dawn 3 Camera 1



Plate 15 (24/07/2025): B10A Dawn 3 Camera 2



Plate 15 (24/07/2025): B10A Dawn 3 Camera 3



Plate 16 (24/07/2025): B10A Dawn 3 Camera 9

Appendix D - End of survey thermal stills

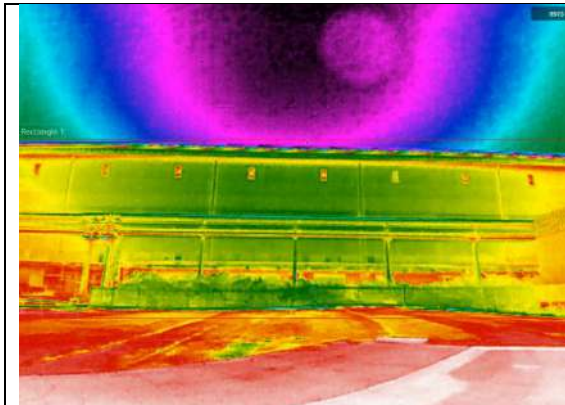


Plate 17 (15/05/2025): B10 Dusk 1 Camera 1

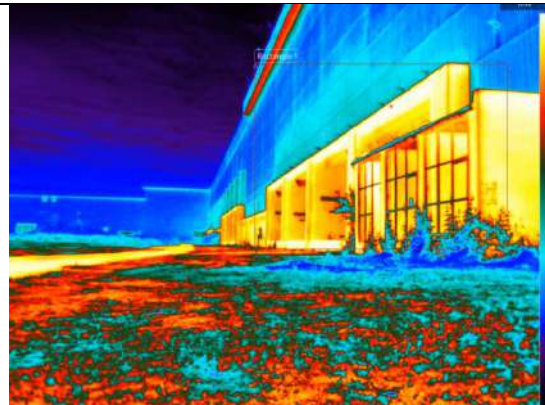


Plate 18 (15/05/2025): B10 Dusk 1 Camera 2

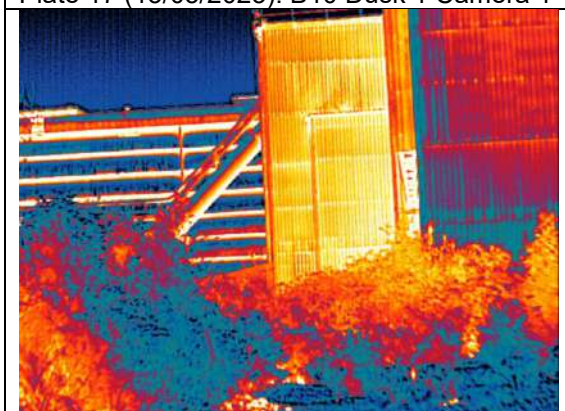


Plate 19 (15/05/2025): B10 Dusk 1 Camera 4

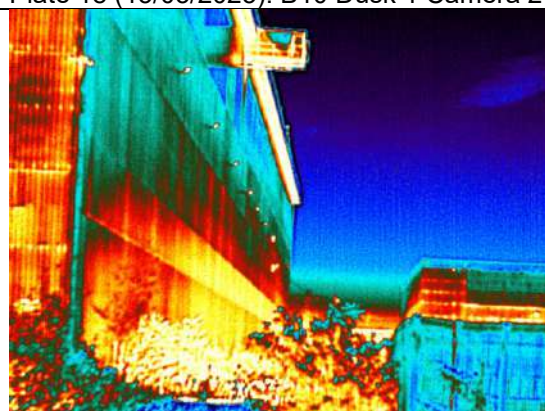


Plate 20 (15/05/2025): B10 Dusk 1 Camera 5

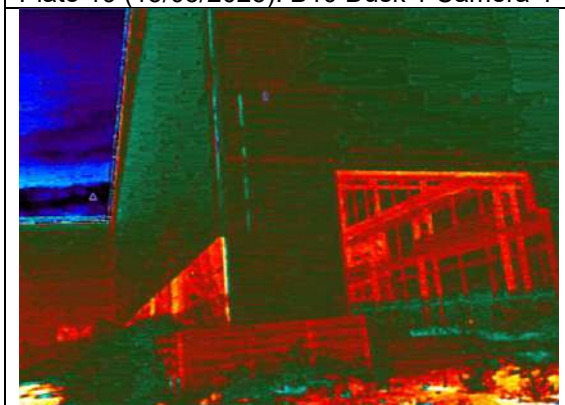


Plate 21 (15/05/2025): B10 Dusk 1 Camera 6



Plate 22 (15/05/2025): B10 Dusk 1 Camera 7

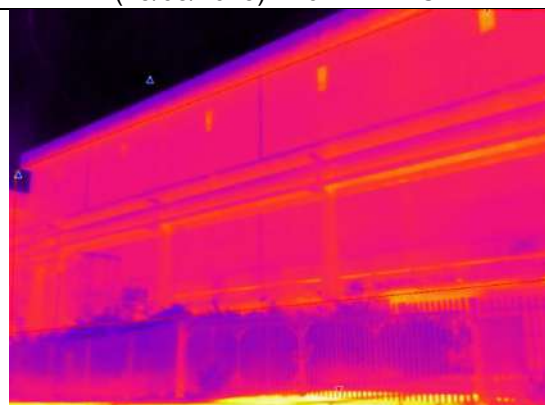
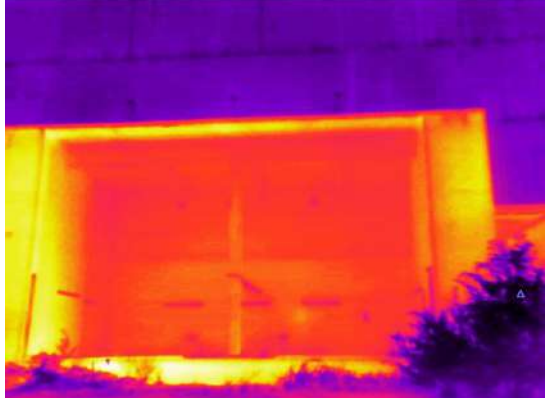
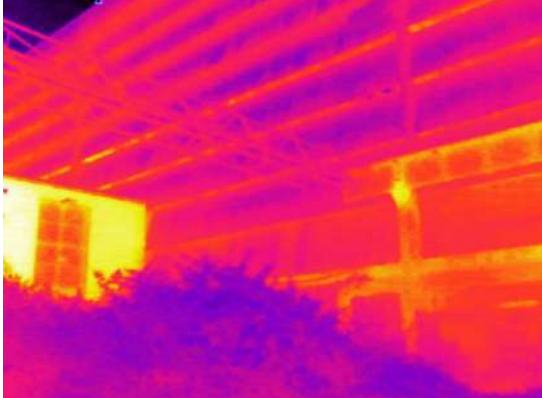
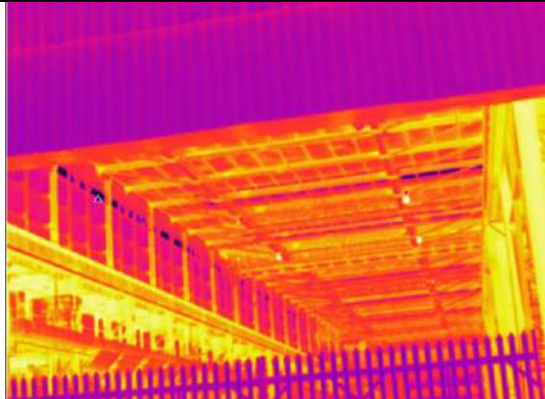
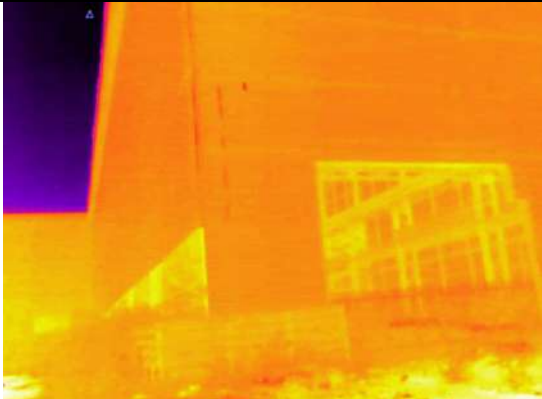
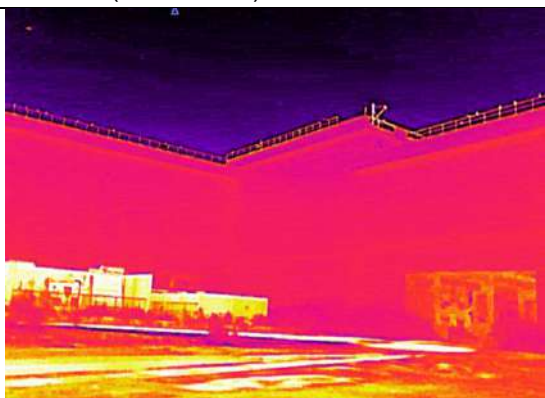


Plate 23 (15/05/2025): B10 Dusk 1 Camera 8	Plate 24 (16/07/2025): B10 Dusk 2 Camera 1
	
Plate 25 (16/07/2025): B10 Dusk 2 Camera 2	Plate 26 (16/07/2025): B10 Dusk 2 Camera 3
	
Plate 27 (16/07/2025): B10 Dusk 2 Camera 5	Plate 28 (16/07/2025): B10 Dusk 2 Camera 6
	
Plate 29 (16/07/2025): B10 Dusk 2 Camera 7	Plate 30 (16/07/2025): B10 Dusk 2 Camera 8
	
Plate 30 (16/07/2025): B10 Dusk 2 Camera 9	

Appendix E - Emergence or re-entry infra-red camera stills

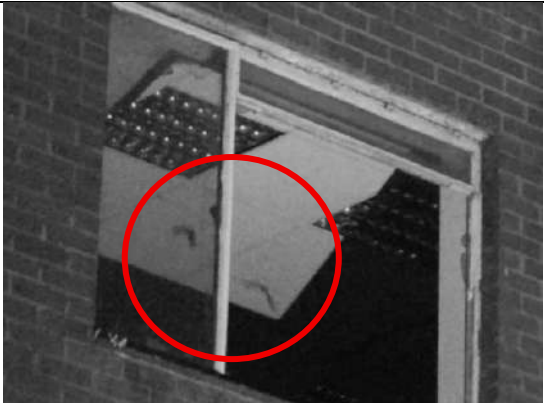
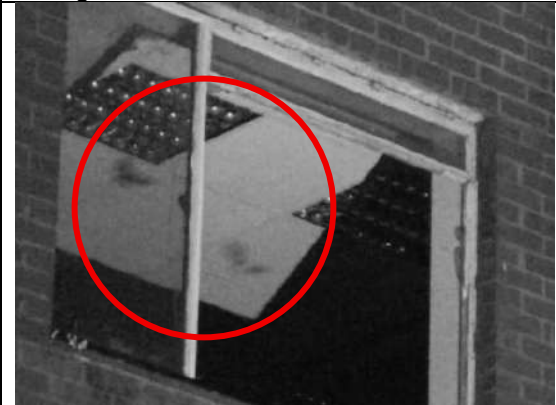
	
Plate 31 (22/05/2025): B13 Dusk 1 Com pip emergence NE corner fascia board 21:38	Plate 32 (16/07/2025): B10C Dusk 2 Bat (unknown species, maybe LHS) re-entry 22:23.
	
Plate 33 (16/07/2025): B10C Dusk 2 Bat (unknown species, maybe LHS) exiting and re-entering the window repeatedly. 22:24.	Plate 34 (16/07/2025): B10C Dusk 2 Com pip perching on exterior of building near window. This behaviour was repeated several times. 22:27.
	
Plate 35 (16/07/2025): B10C Dusk 2 Com pip perching on exterior of building 22:28.	Plate 36 (24/07/2025): B10A Dawn 3 Com pip re-entering SE Corner Hot Mill 03:29.

	
Plate 37 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:18.	Plate 38 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:26.
	
Plate 39 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:31.	Plate 40 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:37
	
Plate 41 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:37	Plate 42 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:40
	

Plate 43 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:42	Plate 44 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:45
	
Plate 45 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:48	Plate 46 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:49
	
Plate 47 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:50	Plate 48 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:50
	
Plate 49 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:51	Plate 50 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:53
	

	
Plate 51 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 21:56	Plate 52 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 22:09
	
Plate 53 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 22:16	Plate 54 (16/07/2025): B10A Dusk 2 Com pip emergence North Ramp Large Opening 22:26

Appendix F – Emergence or Re-entry thermal camera stills

	
Plate 55 (16/07/2025): B10A Dusk 2 Camera 3 Com pip Entry 21:18 (likely for foraging). Not proof of roost.	Plate 56 (16/07/2025): B10A Dusk 2 Camera 3 Com pip Entry 21:19 (likely for foraging). Not proof of roost.
	
Plate 57 (16/07/2025): B10A Dusk 2 Camera 3 Com pip Entry 21:23 (likely for foraging). Not proof of roost.	Plate 58 (16/07/2025): B10A Dusk 2 Camera 3 Com pip Entry 21:24 (likely for foraging). Not proof of roost.
	
Plate 59 (16/07/2025). B10B Dusk 2 Camera 5 Example of foraging activity inside 2121-2145. Not proof of roost.	Plate 60 16/07/2025). B10B Dusk 2 Camera 5 Example of foraging activity inside. 2145-22:14. Not proof of roost.

Appendix G – Bat Access Points Identified by Surveyors

	
Plate 61 (16/07/2025): B10A Dawn re-entry showing approximate entry point. One common pipistrelle entry 04:44.	Plate 62 (24/07/2025): B10A Dawn re-entry showing approximate entry point. Three common pipistrelle entry 04:51, 04:53 and 04:54.
	
Plate 63 (16/07/2025): B10A Dawn re-entry showing approximate entry point. One common pipistrelle entry 05:01.	Plate 64 B10A Dawn re-entry showing approximate entry point. Two common pipistrelle entry 05:03 and 05:04.
	
Plate 65 (16/07/2025): B12 Slab Mill Dawn re-entry showing approximate entry point. One common pipistrelle entry 05:40.	Plate 66 (16/07/2025) B12 Slab Mill close up view of the access point of plate 5 (gap in ceiling for wires).

	
Plate 67 (17/07/2025). B16 The Lab. Two common pipistrelle emergences 21:47. The location of the access point is unknown but believed to be in the inner courtyard,	

Appendix H – Outline Mitigation Plan

Introduction

- 5.1.1 Below is an outline mitigation plan that will form the basis for the method statement which will be put forward to Natural Resources Wales (NRW) in the European Protected Species Licence (EPSL) application.
- 5.1.2 Please note that this Method Statement is subject to approval by the Local Planning Authority and NRW.

Proposed works

- 5.1.3 It is understood that the proposals include the demolition of buildings known to house bat roosts, including buildings 9B, 9C, 10A, 10C, 12 and 13. Parts of 10B within 50m of 10A is also to be included within the licence application due to its proximity to roosts in 10A.
- 5.1.4 Building 10A is a day roost for lesser horseshoe, common pipistrelle and brown long-eared, with hibernation use of all three species. 10C is confirmed as a day and night roost for lesser horseshoe. Buildings 12 and 13 are confirmed as a day roost for common pipistrelle. 9B and 9C are undergoing further monitoring in September 2025, but are likely to be day / night roosts of lesser horseshoe.

Order of mitigation works

- EPSL must be in place prior to the demolition of buildings 9B, 9C, 10A, 10C, 10D (as joined to slab motor room in 10A) and 13. Demolition works to 10B and 12 may start prior to a licence being in place, as long as they are 50m or more away from identified roosts. Works within 50m of identified roosts will take place under licence, due to disturbance risks;
- Building 16 to be enhanced to act as mitigation with bat roosting features installed;
- Works on buildings can begin under supervision once licence received (see timing of works below);
- Unsupervised works can continue once signed off by supervising ecologist.;
- Surveys of buildings 1, 2, 4B, 6, 8, 9A, 9D, 11 to take place in 2026 ahead of demolition;
- Check of mitigation features in B16 once works completed;
- Monitoring period.

Timings of works

- 5.1.5 EPSL must be in place prior to start of demolition works.
- 5.1.6 **Building 10A:** As the building is being used a hibernation roost, **the start of the works will be restricted** to avoid the period of core hibernation period of **November to March inclusive** in areas where bats may be hibernating, these areas include the Hot Mill motor rooms and the Northern cellars (both within 10A). Due to the size of the building, it will be possible to put a 50m buffer around these areas and continue with works outside of these areas in these months.

- 5.1.7 As the building is also being used by a pair of nesting peregrine falcons and a colony of gulls, works should also begin outside of the bird nesting season (taken to be **March-August inclusive**) or demolition must wait until nesting has ceased.
- 5.1.8 **Buildings 9B, 9C, 10C:** As the building is being used as day roosts by small numbers lesser horseshoe bats no timings on works are considered necessary for areas of the building that may be used for day roosting.
- 5.1.9 Once the works have started and the named ecologist (responsible for the licence) has given their approval to proceed timing restriction may be lifted in some areas.
- 5.1.10 **B12 and B13:** As these buildings are used as day roost by small numbers of bats, no timings on works are considered necessary.

Mitigation creation

- 5.1.11 B16 has been shown to be used as a day roost by small numbers of lesser horseshoe bats and common pipistrelle.
- 5.1.12 B16 The Lab has a close resemblance in structure and materials to building 10C The Reheat Furnace offices, which has been found to be a favoured area used by the lesser horseshoe bats. However, building 16 is currently well lit during the day as large windows are present on every elevation, including on those walls facing the internal courtyard.
- 5.1.13 In order to enhance the building to make it more suitable to be used as a bat roost, the following features will be installed:
- Windows will be boarded up / covered to create more dark areas within the building (as large parts of the walls consists of window panes);
 - Existing access points will be retained;
 - Internal doors will be removed to create better connectivity within the building, while some will be retained to prevent wind draught,
 - Some of the inner ceiling panels will be removed to create better connectivity between the rooms via the void above the false inner ceilings (measuring about 1m in height)
 - Two cooling towers will be built inside one of the rooms to allow for roosting areas with different temperatures, following the designs in the *lesser horseshoe bat conservation handbook* (Schofield, 2008).
 - Two x Schwegler 2FN or equivalent bat boxes and 2 x Schwegler 1FF or equivalent bat boxes, to be installed on building externally, at a height of at least 4 m, or as tall as the building if lower. These will provide roosting locations for pipistrelles and brown long-eared bats.
- 5.1.14 The enhancements to B16 (as described above) will provide interim mitigation measures to enable the demolition of the Hot Mill. Medium/long-term mitigation measures will be agreed as part of any future regeneration and redevelopment of the wider site. This will be dealt with at the appropriate time through an amendment to the NRW licence or through a new licence in due course.

Supervised works

- 5.1.15 Certain aspects of the works will be supervised by a suitably licensed and experienced ecologist, to ensure that no harm comes to any bats that may be present. Due to the H&S considerations on the site, this is likely to be restricted to pre-demolition checks of

rooms. Due to the amount of asbestos and other hazardous materials, dismantling features by hand will not always be feasible.

- 5.1.16 The extent and location of these areas will be determined by the named ecologist (responsible for the licence) in collaboration with contractors.
- 5.1.17 A tool-box talk will be given to contractors at the start of the works on how to recognise a bat, where they might be found and what to do in the event of finding one.

Inspection prior to demolition

- 5.1.18 All parts of the buildings that have been confirmed to be used by roosting bats or deemed to have high bat roosting potential will be inspected prior to start of works, if deemed as safe, due to health and safety restrictions.
- 5.1.19 The building or area of building will be inspected for any evidence of bats immediately before the dismantling or demolition.

Soft demolition of potential roosting features

- 5.1.20 Following the internal inspection, under supervision of the licensed ecologist, potential roosting features on the building will be checked and removed by hand, where safe to do so.
- 5.1.21 This will especially include removing the inner ceiling panels inside building 10C as the voids above them have been identified as likely roosting areas for lesser horseshoe bats.
- 5.1.22 If the soft stripping of the inner ceiling panels cannot safely proceed (e.g. due to the presence of asbestos or other unsafe materials) alternative methods such as e.g. a slow and gradual strip with the purpose to expose the areas to daylight and wind draught will be implemented. This will be done to encourage the bats to move out on their own accord,
- 5.1.23 Soft stripping of external features with bat roosting potential in close proximity to identified bat roosts such as e.g. the fascia boards on B13 will be supervised.

Protocol if bats are found

- 5.1.24 If bats are present during any of the above activities then they will be captured by the licensed bat ecologist supervising the works (by hand or hand-held net) and assessed for their potential for release.
- 5.1.25 Bats that are suitable for release will be placed in bat boxes to be located on mature trees within the northern treeline, or within the mitigation that will be created by enhancement of building 16.
- 5.1.26 Lesser horseshoe bats will not be handled, instead a strategy will be created to encourage the bats to move on to another roosting location on their own accord by gradually excluding them from roosting areas over a period of several days (if deemed necessary). It is likely that once works start, bats will naturally vacate the building.
- 5.1.27 If bats are considered unsuitable for release (i.e. injured), they will receive veterinary care as required and be kept in care until they are suitable for release at an appropriate time of year.

- 5.1.28 After the above procedures, once the structures affected by the development works are deemed clear of bats by the licenced ecologist, unsupervised works can take place; however, an ecologist will be on call in the event of bats being found. If bats are discovered when the licensed ecologist is not present then contractors must stop work immediately contact RSK Biocensus. NRW will be informed by the named ecologist where necessary.

Enhancements

- 5.1.29 To meet the guidance of Planning Policy Wales 12, five bat boxes will be installed in the norther treeline of the site (in-between the railway lines) in addition to the specified temporary mitigation above. The boxes will be a mix of woodcrete type boxes, with varying size chambers and will be installed on the mature trees within the north-western corner of the site. The boxes must be installed on a southerly elevation and at a height of 4-6m.

Other Considerations

- 5.1.30 Only use Tanalised timber or wood treatment chemicals approved for use in bat roosts by Natural England (advice here <https://www.gov.uk/guidance/bat-roosts-use-of-chemical-pest-control-products-and-timber-treatments-in-or-near-them>).
- 5.1.31 Only Type 1F bitumen felt can be used in areas where bats will have access, as breathable membranes have been shown to cause fatalities in bat roosts.
- 5.1.32 No external lighting to illuminate building 16. No lighting can illuminate the lesser horseshoe bat access points, which are believed to be broken windows of the building along the western and eastern elevations.

Monitoring

- 5.1.33 Once all mitigation is in place a compliance check will be completed.
- 5.1.34 A monitoring visit will then be carried out once a year after completion of installing the bat roosting features for years 1-5 following start of demolition works (anticipated to be 2026-2030).
- 5.1.35 A daytime internal physical inspection for evidence of bats (such as live bats, droppings and insect feeding remains) inside the building will be carried out by a licensed bat ecologist. A single emergence survey will be carried out on building 16 between June and August each monitoring year.



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