



Bat Mitigation Method Statement

Mendalgief Road

Newport, South Wales

For

LNT Construction Ltd

Project No.: LNT001-019-007/001/001

April 2026

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1. Introduction

1.1 Development Background

- 1.1.1 LNT Construction Ltd. is preparing a planning proposal for the construction of a new care home on a 0.69ha site at Mendalgief Road, Newport, South Wales, NP20 2SL, (Grid Reference: ST 30876 86936). The proposals include the demolition of existing buildings and the construction of a new care home with access, parking and private gardens.
- 1.1.2 Demolition works are planned for the week commencing, (approximately) 7th April 2026. These will involve the demolition of two small buildings onsite, u1b5-1 and u1b5-2 (Thomson 2024a). This Bat Mitigation Method Statement sets out precautionary measures that will be implemented prior to and during this demolition order to prevent any breaches of legislation with regard to protected species or adverse impacts on biodiversity.
- 1.1.3 These proposals are hereafter referred to as “the works” and the area of land impacted by the works is hereafter referred to as “the site”.
- 1.1.4 This project has been granted conditional consent from Newport City Council (application reference 25/0375), with condition 4 making direct reference to preparation of a Bat Method Statement as follows, “*Prior to the commencement of development, including demolition, a Bat Method Statement including measures as recommended in Section 6 of the approved document Bat Emergence Survey shall be submitted to and approved in writing by the Local Planning Authority. The development shall be undertaken in accordance with the approved details. Reason: To agree precautionary measures to protect European Protected Species in accordance with Policy GP6 of the NLDP 2011-2026 (adopted January 2015)*”.

1.2 Ecology Background

- 1.2.1 A Preliminary Ecological Appraisal (PEA) of the site was completed in June 2024 (Thomson, 2024a) with further surveys recommended for roosting bats. Records of five bat species were returned within the 1km desk study area for the PEA report, and there were buildings on the site with the potential to support roosting bats. The woodland adjacent to the site also has potential to support foraging and commuting bats, with connectivity to the wider landscape.
- 1.2.2 A Preliminary Roost Assessment (PRA) & Ground Level Tree Assessment (GLTA) survey was undertaken in November 2024, (Thomson, 2024b), with a report provided in January 2025 for the site in accordance with criteria detailed within the Bat Survey Guidelines (Collins (ed.), 2023). The assessment identified two of the buildings onsite (ub15-1 and ub15-2) as having moderate suitability. Further surveys were recommended to determine presence/likely absence of roosting bats within u1b5-1 and u1b5-2. The area of ‘T1’ represents multiple (four or five) stemmed trees located on Network Rail land outside of the site boundary but in close proximity. These were classified as having potential to support roosting bats and classified as PRF only.
- 1.2.3 Bat Emergence Surveys were undertaken at the site with no bat roosts recorded, (Thomson, 2025). During all four surveys, no bats were recorded emerging from either building that were

surveyed (u1b5-1 & u1b5-2). However, incidental records of bats were recorded along the woodland edge on the north site boundary (Network Rail owned land). Four species of bat, Common pipistrelle (*Pipistrellus pipistrellus*), Nathusius' pipistrelle (*Pipistrellus nathusii*), Noctule (*Nyctalus noctula*) and Soprano pipistrelle (*Pipistrellus pygmaeus*) were recorded incidentally during the dusk emergence survey visits.

1.3 The Brief and Objectives

- 1.3.1 LNT Construction Ltd commissioned Thomson Environmental Consultants Ltd on the 3rd February 2026 to produce a Bat Mitigation Method Statement prior to the commencement of development, including demolition works. This report will include measures as recommended in Section 6 of the approved document Bat Emergence Survey, and shall be submitted to and approved in writing by the Local Planning authority. The development shall be undertaken in accordance with the approved details.

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- Legend
- Overall Suitability of Tree to Support Roosting Bats
- PRF
- Overall Potential (whole building) to Support Roosting Bats
- Moderate
- Buildings to be Demolished
- u1b5-1
 - u1b5-2
- No Construction Zone
- Site Boundary

Map Centre Grid Reference: 330916E 186940N

Contains Ordnance Survey data
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Drawing Ref		LNT001-019/406742/1
Scale at A3		1:600
Drawn	Checked	
ET	AS	
Date	Date	
01/04/2026	01/04/2026	
Client		LNT Construction Ltd
Figure Number		2

Figure Title

Survey Results of the Preliminary
Roost Assessment, Ground Level
Tree Assessment and Building
Demolition Works



Photograph 1: u1b5-1
Ivy covering the side of the building.



Photograph 2: u1b5-1
Hole within a window board.



Photograph 3: u1b5-1
Hole within a brick wall.



Photograph 4: u1b5-2
Broken window, entry point into the building.



Photograph 5: u1b5-2
Damaged masonry, building interior.



Photograph 6: u1b5-2
Missing mortar, external.



Photograph 7: u1b5-2
Hole within brickwork



Photograph 8: T1
Dead trees along site boundary.

Client	LNT Construction Ltd	Drawing Ref		LNT001-019-006/001/001		Thomson environmental consultants www.thomsonec.com enquiries@thomsonec.com
Figure Number	3	Drawn	JL	Checked	CB	
Figure Title	Photographs of the Site	Date		08/07/2025		

2. Legal Considerations and Rationale

2.1 Legal Framework

2.1.1 All British bats receive comprehensive protection under:

- The Conservation of Habitats and Species Regulations, 2017 (as amended);
- The Wildlife and Countryside Act 1981, (as amended);
- The Countryside Rights of Way Act 2000 (which amends the Wildlife and Countryside Act 1981); and
- The Natural Environment and Rural Communities (NERC) Act 2006 (which amends the Wildlife and Countryside Act 1981).

2.1.2 Taken together, this legislation in combination makes it an offence to deliberately capture, injure, kill or disturb a bat. It is also an offence to damage, destroy and intentionally or recklessly obstruct access to any structure or place used for shelter or protection by a bat.

2.1.3 The Conservation of Habitats and Species Regulations 2017 makes it an offence to '*deliberately disturb a bat in such a way as to be likely to impair its ability to survive to breed or reproduce, or to rear or nurture its young; or to impair its ability to hibernate or migrate; or affect significantly the local distribution or abundance of the species to which they belong.*'

2.1.4 In addition, bats are listed as Newport City Council's priority species, as well as being listed as national priority species. Bats are therefore part of the local Biodiversity Action Plan and are protected under sections 41 (England) and 42 (Wales) of the NERC Act 2006. In addition to the seven bat species listed in section 41 of the NERC Act 2006, Wales also includes common pipistrelle as a priority species, as listed in section 42, as well as section 7 of the Environment (Wales) Act 2016. Four species incidentally recorded during the survey effort of this report are priority species; common, Nathusius' and soprano pipistrelle as well as noctule.

2.1.5 Future Wales - the National Plan 2040 states the following:

2.1.6 *"Outcome 10 focuses on places with biodiverse, resilient and connected ecosystems. As such, the variety of flora and fauna found across Wales make Wales a special place. Biodiversity underpins the functioning of healthy, resilient ecosystems and the multiple benefits they provide. While biodiversity has declined in recent decades, we will reverse these losses and enhance the resilience of ecosystems. The planning system will ensure wildlife is able to thrive in healthy, diverse habitats, both in urban and rural areas, recognising and valuing the multiple benefits to people and nature."*

2.1.7 "Policy 9 concerns Resilient Ecological Networks and Green Infrastructure. To ensure the enhancement of biodiversity, the resilience of ecosystems and the provision of green infrastructure, the Welsh Government will work with key partners to:"

- *"identify areas which should be safeguarded and created as ecological networks for their importance for adaptation to climate change, for habitat protection, restoration or creation, to protect species, or which provide key ecosystems services, to ensure they are not unduly compromised by future development; and"*

- *“identify opportunities where existing and potential green infrastructure could be maximised as part of placemaking, requiring the use of nature-based solutions as a key mechanism for securing sustainable growth, ecological connectivity, social equality and well-being. Planning authorities should include these areas and/or opportunities in their development plan strategies and policies in order to promote and safeguard the functions and opportunities they provide. In all cases, action towards securing the maintenance and enhancement of biodiversity (to provide a net benefit), the resilience of ecosystems and green infrastructure assets must be demonstrated as part of development proposals through innovative, naturebased approaches to site planning and the design of the built environment. Diligence in the development with respect to bats will ensure the development remains in line with local planning policy.”*

- 2.1.8** This project has been granted conditional consent from Newport City Council (application reference 25/0375), therefore consideration of policies by the Planning Policy Wales (PPW) relating to the natural environment should be made. PPW states that developments should aim to conserve or enhance biodiversity and encourages opportunities to incorporate biodiversity in and around developments.
- 2.1.9** The Biodiversity Action Plan (BAP) includes a species action plan for bats, which includes the local positive factors and threats. The threats include the following: Loss of and damage to roosting sites, including buildings, hollow trees, and underground structures (mines, tunnels, ice-houses, cellars, etc).
- 2.1.10** Within the BAP, the conservation objectives are, to contribute to UK bat species action plans by:
- Enhancing, where necessary, roosting sites (including hibernation sites) and important feeding habitats (particularly around maternity roosts) - with the aim of increasing bat population levels within the County. Recommendations are made in Section 6 to ensure that the development is compliant with respect to the above legislation and policy; and
 - Maintaining known populations of all bat species in the County.
- 2.1.11** Moreover, section 7 of the Environment (Wales) Act 2016 lists the living organisms of principal importance for the purpose of maintaining and enhancing biodiversity in relation to Wales. In this list, three species incidentally observed on site during the survey effort are named. These being the:
- Common pipistrelle
 - Noctule and;
 - Soprano pipistrelle

2.2 Rationale

- 2.2.1** The proposals include the demolition of buildings u1b5-1 and u1b5-2, both of which have been found to support no roosting bats.
- 2.2.2** No bats were found during the survey visits; however, bats are mobile and frequently change roosting sites and therefore could begin roosting within the features identified within the buildings at any time. It is recommended that contractors receive a toolbox talk for bats as part of site induction. If in the unlikely event a bat is found during works, works should cease immediately, and a suitably experienced ecologist contacted.

- 2.2.3** A Bat Method Statement was recommended on the back of the previous emergence surveys during 2025. This current report is the resulting method statement and details the precautionary measures to minimise the disturbance of bats if present in the buildings.

3. Precautionary Method of Works

3.1 Before Works

- 3.1.1 A 'toolbox talk' (TBT) will be given by the attending ecologist that understands the information noted within this report and is familiar with the work site. The toolbox talk will be delivered to all operatives in a supervisory role (on site) prior to any site works commencing. This briefing can be delivered remotely or on site prior to the works taking place. The toolbox talk is to include:
- A summary of the legal protection afforded to the protected species that could occur on site (Section 2);
 - Information regarding where these species may be present;
 - How to identify these species (key morphological features, size etc.); and
 - A summary of the key points from the PMoW document, and the measures that operatives should follow in the event that any of these protected species are encountered on the site during the works.

3.2 During Works

- 3.2.1 Impacts on bats that could result in an offence under the relevant legislation will be avoided by the implementation of the following precautionary working methods:
- Demolition works to take place outside of the maternity and hibernation seasons (*i.e.* demolition to occur in late March-April, or September-October, inclusive) as this is when bats are least likely to be vulnerable to disturbance. However, due to the moderate potential of both buildings surveyed on site, potential for maternity roosts is unlikely and therefore works do not have to take place outside of the maternity season, though it is recommended.
 - Soft strip demolition of u1b5-1 and u1b5-2. Both buildings should have all potential roost features removed carefully by hand before they're demolished completely.
 - **Should a bat be found/disturbed - Works to pause immediately and a suitably experienced ecologist to be contacted to advise on additional measures.**
 - Disturbance will be minimised by conducting the works during daylight hours, avoiding the need for any lighting or noise while bats are foraging or commuting at night. This is particularly paramount for the potential of commuting and foraging bats along the northern boundary.
 - Use of low noise and low vibration working methods as far as practicable, positioning of generators or other noisy machinery and turning off machinery when not in use, and or use of acoustic barriers.

- It should be noted that the parcels of scrub (h3h-1 & h3h-2) are beginning to colonise both u1b5-1 and u1b5-2, and as a result made u1b5-1 inaccessible to survey from the northern, eastern and western aspects, whilst making u1b5-2 inaccessible from the eastern, southern and western aspects. Due to this, it is impossible to rule out the potential for more PRF's to be hidden behind the scrub. As a result, if vegetation clearance is to be undertaken, it should be done so carefully and if a PRF or signs of a bat are discovered - a suitably qualified ecologist should be contacted for further recommendations. A full list of recorded PRF's is attached in Appendix 1.
- All vegetation which is to be retained by the development should have a 10m buffer implemented to limit impacts and disturbance, including around T1. Noise disturbance should be kept to a minimum during the works. Examples of this are as follows: turning off idling machinery and generators when not in use and reducing the amount of vehicular traffic/ restricting works traffic within 10m.

4. Toolbox Talk Attendance Form

[illegible]

5. References

Thomson Environmental Consultants, (2024a). Preliminary Ecological Appraisal, Mendalgief Road, Newport.

Thomson Environmental Consultants, (2024b). Preliminary Roost Assessment and Ground Level Tree Assessment, Mendalgief Road, Newport.

Thomson Environmental Consultants, (2025). Bat Emergence Survey Report, Mendalgief Road, Newport.

Appendix 1: Full External Assessment - PRA

Attribute	Building 1	Building 2
Type	Disused building	Disused building
Presence of roof void	No	No
Year built	1960-Present	1960-Present
Aspect	N/A	N/A
Building height	Unknown	Unknown
Building width	Unknown	Unknown
Wall type	Brick with cavity	Brick with cavity
Wall construction	Brick	Brick
Presence of other wall materials	N/A	N/A
Condition of other wall materials	N/A	N/A
Presence and form of roof	Flat	Flat
Presence of roof void	N/A	N/A
Type of roof covering	Unknown	Unknown
Condition of roof covering	Unknown	Unknown
Presence and form of eaves	Unknown	Unknown
Eaves condition	Unknown	Unknown
Presence of flashing	Unknown	Unknown

Attribute	Building 1	Building 2
Condition of flashing	Unknown	Unknown
Window frame type	Unknown	Unknown
Number of storeys	1	1
Building description	Derelict building	Derelict building
Habitat description	Active construction site	Active construction site
Number of roosts confirmed	0	0
Evidence of bats	No	No
PRF 1 Type	Hole in brick work	Hole in brick work
PRF 1 Description	Missing mortar/ gap between bricks	Large hole in brickwork penetrating building.
PRF 1 Position	Unknown	Unknown
PRF 1 Aspect	South East	West
PRF 1 Exposure	Unknown	Unknown
PRF 1 Size of PRF	Unknown	Unknown
PRF 1 Roost Suitability	Low. Day/Night/Occasional Roosts	Moderate. Day/Night/Occasional Roosts
PRF 2 Type	Window boarding	Damaged masonry
PRF 2 Description	Damaged masonry around windows in building interior	Damaged masonry around windows in building interior.
PRF 2 Position	Unknown	Unknown
PRF 2 Aspect	South West	West

Attribute	Building 1	Building 2
PRF 2 Exposure	Unknown	Unknown
PRF 2 Size of PRF	Unknown	
PRF 2 Roost Suitability	Low. Day/Night/Occasional Roosts	Moderate. Day/Night/Occasional Roosts
PRF 3 Type	Ivy	Gaps in window
PRF 3 Description	Ivy growing around the building may hide further PRFs	Smashed windows granting access to building interior
PRF 3 Position	Unknown	Unknown
PRF 3 Aspect	North	West
PRF 3 Exposure	Unknown	Unknown
PRF 3 Size of PRF	Unknown	Unknown
PRF 3 Roost Suitability	Low. Day/Night/Occasional Roosts	Moderate. Day/Night/Transitional roosts
PRF 4 Type	N/A	Missing mortar
PRF 4 Description	N/A	Some small gaps comprising missing mortar fillets on exterior
PRF 4 Position	N/A	Unknown
PRF 4 Aspect	N/A	West
PRF 4 Exposure	N/A	Unknown
PRF 4 Size of PRF	N/A	Unknown

Attribute	Building 1	Building 2
PRF 4 Roost Suitability	N/A	Low. Day/Night/Occasional roosts
Distance to hedge	Unknown	Unknown
Distance to woodland	Unknown	Unknown
Distance to water	Unknown	Unknown
Setting	Active construction site	Active construction site
Surrounding area habitat quality	Unknown	Unknown
Level of disturbance/lighting	Unknown	Unknown
Current use of structure	Disused	Disused
Overall roosting suitability	Moderate	Moderate