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Template Method Statement to be used within a Bat Development Licence Application

This template Method Statement is to be used to form part of your Licence Application for a European Protected Species Development Licence. It will be used to determine the impact of the application on the favourable conservation status of the species concerned (Regulation 55(9) (b) of the Conservation of Habitats and Species Regulations 2017). It must be prepared by a consultant ecologist or other suitably qualified person. You are strongly advised to refer to the Bat Mitigation Guidelines¹, and The Bat Survey Guidelines (3rd Edition). Please submit your Application and supporting Method Statement electronically to the contact details provided below.

Please note as of the 1st March 2018 the declaration box found at the end of this template must be included on any Method Statements submitted in support of a licence application, and must be signed and dated by the applicant and ecologist. Any application containing a Method Statement without this declaration will be rejected.

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Method Statement Title:	Hot Mill, Llanwern Steelworks, Newport – Bat Mitigation and Compensation Method Statement
Method Statement Version Number:	1.0
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¹ Bat Mitigation Guidelines (IN136) available to download from the Natural England website

Site Address:	Former Hot Mill, Llanwern Steelworks, Llanwern, Newport, NP19 4QZ (Grid Ref ST 37619 86666)
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Background and Supporting Information

A Executive Summary

RSK Biocensus was commissioned by Tata Steel UK Ltd to conduct bat surveys of the former Hot Mill and adjacent structures at Llanwern Steelworks, north of Queensway, Newport, South Wales (central grid reference ST 37619 86666). The initial preliminary roost assessments covered 33 buildings, of which 27 are located within the Construction, Design and Management (CDM) area of Llanwern steelworks and are proposed to be demolished. Demolition of the buildings is required as they are derelict industrial structures that present significant health-and-safety constraints and are no longer useable.

The main building is called the Hot Mill, which has five identifiable areas (included in the total of 27 buildings) and is a very large building, with a footprint of c.11.6 hectares. The main body of the building is approximately 800 meters (length) x 60m (width) x 30m (height). The two attached hangar like structures the 'Dispatch Bay' (labelled as 10B in report and figures) is c. 450m (length) x 70m (width) x 30m (height) and the 'Slab Mill Yard' (labelled as 12 in report and figures) is c. 350m (length) x 135m (width) x 30m (height).

The aim of the assessment was to determine whether bats were present, which species and how they were using the buildings, so that demolition proposals could be designed and licenced appropriately.

The scale of the Site and historic use has provided some unique challenges to the survey effort including 800m long building sides, hazards including asbestos (purported to be the largest concentration in Europe), and numerous other contaminants and potential for pyrophoric materials to be present.

Thirty-three buildings (including the Hot Mill) and structures within the site and wider survey area were assessed. Eleven had negligible bat-roost potential, eleven had low potential, two had moderate potential and nine showed confirmed evidence of bats. Six of the 33 buildings are more than 200m from the demolition area, and were included to give wider context to findings, this includes three of the nine that were confirmed as bat roosts.

The Hot Mill and several other buildings were subject to emergence / dawn backtracking surveys in 2025, with static detector monitoring in the Hot Mill (areas labelled 10A, 10B, 10C, and 12), buildings 9B, 9C and 16 over multiple occasions. The Hot Mill was also subject to hibernation surveys in specific areas.

In summary, the bat surveys at Llanwern recorded small roosts of common pipistrelle, lesser horseshoe and brown long-eared bats. All roosts were assessed as having site-level or local importance, and no maternity roosts were detected. With implementation of the proposed mitigation—including the enhancement of Building 16

and installation of new bat boxes—and careful timing of demolition works, the project will not affect the favourable conservation status of the bat species present.

Common pipistrelle day roosts were recorded in the Hot Mill (sections 10A (maximum count 18 bats) and 12 (one bat)), 13 (one bat), 16 (two bats) and 22 (a dead bat during preliminary assessment). Winter use of 10A was confirmed during hibernation surveys when a dead pipistrelle and calls were recorded between December 2024 and February 2025. Overall, common pipistrelle roosts at the site (comprising day and hibernation roosts) were assessed as being of **site value**.

Evidence of lesser horseshoe bats was found in buildings 9B, 9C, the Hot Mill (sections 10A (north basement and slab-yard motor rooms) and 10C) and 16. Droppings were found in 9B, 9C, 10C and 16, while static detectors at 10A and 10C recorded calls prior to sunset, confirming day roosting. Dropping numbers were generally low, suggesting use by individuals or small numbers (estimate of 5 bats), and no evidence of hibernation was found, although parts of 10A offers potential winter sites. These roosts (day, night and potential hibernation) were considered to be of **local value**.

For brown long-eared bats, a single dead individual was found in 10A and two recordings were made during winter surveys. Although not observed roosting during the 2025 emergence surveys, brown long-eared calls were recorded on five static detector deployments around the Hot Mill, suggesting a small roost nearby. Given the building's size and the species' quiet call, it is likely small numbers (estimate of 5) roost within 10A outside winter. Brown long-eared roosts at the site (day and potential hibernation) were therefore assessed as being of **site value**.

Demolition will result in the loss of all buildings with bat-roosts within the CDM boundary. These are buildings 9B, 9C, Hot Mill (areas 10A, 10C, 12) and 13. Without mitigation, bats could be disturbed, killed or injured and roosts lost.

A bat mitigation licence from Natural Resources Wales is therefore required.

The outline mitigation strategy proposes enhancing Building 16 (The Lab), which is a disused office / laboratory located to the north of the demolition area. This building was subject to surveys in 2025, and was identified to contain day roosts of common pipistrelle (peak count of 2) and lesser horseshoe (estimate of 5 max), however it is sub-optimal currently as large windows are present on all elevations which light the interior during the day. The lesser horseshoes are using the 1m high void above the internal ceiling panels, which is a cluttered space.

To enhance this building to provide sufficient roosting space to compensate for the loss of other roosting sites, the windows will be blocked / darkened, existing access points will be retained, internal doors will be opened and ceiling panels will be removed to open up more of the building to bats. Cool towers will be built to provide temperature gradients and four bat boxes installed externally, to provide suitable roosting conditions for crevice and cavity dwelling bats (e.g. pipistrelles and brown long-eared). Additional bat boxes will be installed along the site's northern treeline to increase roosting opportunities away from the demolition area. Licensed supervision will be present during enhancement works as the building is a confirmed bat roost already.

Works will be supervised by a licensed ecologist where possible (amount of supervision will be dictated by health and safety requirements given asbestos and method of demolition), and licensed ecologist will be on call outside of these times.

Part of the Hot Mill (section 10A) contains basements / cellars and was confirmed to be used by brown long-eared and common pipistrelle bats during winter. Demolition of this section will be timed to start outside the hibernation season (works proposed to start between April to October). The basements / cellars will be monitored between December 2025 – February 2026 to determine if any other species use them for hibernation in this period.

Buildings used as day-roosts (9B, 9C, 10C, 12, 13) have no specific seasonal constraints once mitigation is in place.

Compliance checks and annual monitoring are planned for five years after demolition to ensure the new roosts are used and the favourable conservation status of bats is maintained.

Eight buildings with roost potential are not scheduled for demolition until 2027–28 and therefore were not subject to emergence surveys in 2025. Buildings 1, 2, 4B, 6, 8, 9A, 9D and 11, will be subject to update inspections and emergence surveys in 2026. All are more than 30m from proposed demolition activities that will take place before they are surveyed. If bats are identified roosting in any of these buildings, the licence will be amended prior to any works which could affect the roost.

Prior to the start of demolition, equipment and machinery is proposed to be removed from the interior of the former Hot Mill (buildings 10A, 10B, 10C, 10D and 12). These will be unbolted from the floors and lifted out via existing cranes that roll along tracks, and would deposit the machinery at existing roller shutters. Such works do intermittently take place already within the building, as part of routine maintenance, and these areas are not where bats have been identified roosting. In addition, some demolition works on section 10B and 12 will be completed prior to the licence being issued. All works are more than 50m from roosting locations. Provided works are discussed in detail with an ecologist, and areas with potential for roosting bats to be present are checked in advance, it is considered that this could start in advance of the bat mitigation licence having been received, as the risk of causing an offence is negligible.

It should be noted that there is a longer term intention to create a new dedicated bat house on land within Tata's landholding to the north, within a strip of woodland north of building 16 and the railway line. This requires planning permission and so is not included in this application, as the timescales for planning and development do not meet with the demolition programme. An application may be made in future to either amend the licence, or for a new licence that will incorporate the new bat house as a permanent mitigation solution.

B Introduction

B.1 Background to activity/development

Demolition and clearance of the former Hot Mill at Llanwern and adjoining structures, including buildings confirmed to support bat roosts (notably 9B, 9C, 10A, 10C, 12 and 13), delivered in phased works over an anticipated three-year period.

The works will remove large, derelict industrial structures that present significant health-and-safety constraints (e.g., asbestos, pyrophoric materials and restricted access within the vast Hot Mill complex), and to enable site decommissioning/redevelopment in a controlled, legally compliant manner. Because several buildings contain legally protected bat roosts, an EPS licence and a mitigation

strategy (e.g., creating replacement roosts prior to demolition) are required so the works can proceed without committing an offence and without adverse effects on conservation status.

B.2 Full details of proposed works on site that are to be covered by the licence

The proposed works comprise the demolition of the former Hot Mill and associated industrial buildings within the Llanwern Steelworks CDM area (as shown on Figure 1 and Figure 5 below). The works will involve strip-out of internal machinery and plant, removal of asbestos, demolition of steel frames, roof sheeting and cladding, and breaking up of concrete foundations. Any pits or underground structures will be filled and the ground levelled. Demolition is required to remove unsafe structures and facilitate the regeneration of the steelworks site. Works will be phased over approximately three years. Following demolition, the site will be prepared for redevelopment. Any future development will be subject to separate planning permission.

This licence is to cover demolition of buildings 9A, 9B, 10A, 10C, 10D, 12 and 13. All of these are confirmed bat roosts, except 10D, which is connected to 10A in a location where lesser horseshoes roost, and therefore could not be demolished without disturbance impacts.

This licence is also to cover enhancement works to building 16, which is currently used by small numbers of lesser horseshoe and common pipistrelle bats, with potential to support more bats and individual roosting locations following improvements.

B.3 Actions requiring licensing,

Actions requiring licensing;

- Disturb bats in the roost prior to works through noise and vibration;
- Capture bats that may be present at the time of works and transport them to either B16 or a bat box;
- Damage and destroy a resting place.

An internal inspection of selected parts the building/s will be required to be undertaken to ascertain if bats are present within the building at the time of works. Any bats observed during the internal inspection within the building and at the time of works will need to be captured and moved from the building throughout the works. Exclusion may be used on some of the small buildings, however is not possible for the Hot Mill areas due to the scale of the structures present.

Bats will be relocated to bat boxes or bat mitigation structures provided dependent upon species. Demolition works at the site will result in the damage and destruction of a resting place which will not be reinstated in its previous form. Mitigation will be provided on site in building 16 and bat boxes.

C Survey and site assessment

C.1 Existing information on the bat species at the survey site.

A data search for records of bats and their roosts within the Site boundary and a 2 kilometre (km) buffer was obtained from South East Wales Biodiversity Records Centre in July 2025.

The desk study also included a search for any statutory and non-statutory designated sites for which bats are a reason for designation/qualifying feature.

Table 1: Data Sources

Information Obtained	Available From
Bat records	South East Wales Biodiversity Records Centre
Designated site locations and citations	Natural Resource Wales
Designated site locations and citations	Joint Nature Conservation Committee (JNCC) Website
Designated site locations and citations	South East Wales Biodiversity Records Centre
Designations and legal protection of noteworthy species	Joint Nature Conservation Committee (JNCC) Website
Areas/Habitats of Strategic Significance	https://www.newport.gov.uk/environment/biodiversity

- Internationally designated statutory sites search distance: 10 km.
- All statutory designated sites search distance: 2 km.
- Non-statutory designated sites search distance: 2 km.

The search areas used has taken into account the potential distance/ area over which an impact could occur as a result of the proposed works.

The desk study returned records of seven bat species as outlined in Table 2 below.

Table 2 Bat records within 2 km of the site boundary

Scientific name	Common name	Designation	Most Recent
<i>Myotis</i>	Myotis bat species	EPS(Sch2), WCA5	2021
<i>Myotis daubentonii</i>	Daubenton's bat	EPS(Sch2), WCA5	2021
<i>Myotis nattereri</i>	Natterer's bat	EPS(Sch2), WCA5	2023
<i>Nyctalus</i>	Nyctalus bat species	EPS(Sch2), WCA5	2018
<i>Nyctalus noctula</i>	Noctule	EPS(Sch2), WCA5, S7	2023
<i>Pipistrellus</i>	Pipistrelle bat species	EPS(Sch2), WCA5, S7	2019
<i>Pipistrellus pipistrellus</i>	Common pipistrelle	EPS(Sch2), WCA5, S7	2023
<i>Pipistrellus pipistrellus</i>	Pipistrelle	EPS(Sch2), WCA5, S7	2016
<i>Pipistrellus pygmaeus</i>	Soprano pipistrelle	EPS(Sch2), WCA5, S7	2023
<i>Plecotus</i>	Long-eared bat species	EPS(Sch2), WCA5	2018
<i>Plecotus auritus</i>	Brown long-eared bat	EPS(Sch2), WCA5, S7	2019
<i>Rhinolophus hipposideros</i>	Lesser horseshoe bat	EPS(Sch2), WCA5, S7	2018

In addition to the above, the desk study returned records from Llanwern Steelworks from between 1/7/2018 and 30/09/2018. These records are associated with historic proposed

works to the north of the Survey Area, in the strip of woodland between the train tracks, approximately 380m north of the Site. The records suggest up to 23 tree roosts and one building roost were identified during the course of the surveys, all of single bats, all outside the Survey Area.

Table 3 Roosts previously identified within the Llanwern Steelworks site by Mott MacDonald between 01/07/2017 and 30/09/2018

Species	Common name	Roost location	Number of roosts identified
<i>Chiroptera</i>	Bat	Tree	4
<i>Eptesicus serotinus</i>	Serotine	Tree	7
<i>Nyctalus noctula</i>	Noctule	Tree	1
<i>Pipistrellus</i>	Pipistrelle Bat species	Tree	3
<i>Pipistrellus</i>	Pipistrelle Bat species	Building	1
<i>Pipistrellus pipistrellus</i>	Common Pipistrelle	Tree	5
<i>Pipistrellus pygmaeus</i>	Soprano Pipistrelle	Tree	3

A search for known roosts within 5km of the Site was undertaken, with 22 roosts returned (not including those in Table 3 above). The results from this part of the desk study are outlined in Table 4 below.

Table 4. 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

C.2 Statutory sites notified for the species (SSSIs or SA

A review of statutory and non-statutory designated sites for nature conservation within 2km of the Site identified none that mention bats as a primary or secondary reason for designation.

C.3 Objectives of the survey.

- **Overall objective** – The surveys sought to determine whether bats were present on the Site, and if so to identify the species involved and their numbers, in order to understand how bats use the various buildings and structures (e.g. as day roosts, night roosts or hibernation sites). This information was needed to assess the potential impacts of demolition and to design appropriate mitigation.
- **Preliminary roost assessment (PRA)** – The PRA(s) undertaken involved internal (where possible) and external inspections of each building to identify potential roost features (cracks, cavities, crevices) and evidence of bat use (e.g. droppings, staining). Buildings were then categorised by their roosting suitability to determine which required further survey.
- **Winter hibernation survey** – Conducted between December and March, this survey checked likely hibernation sites (of the Hot Mill motor rooms and basement) for bats roosting over winter, using both visual searches and static bat detectors.
- **Dusk emergence surveys** – Carried out at sunset, these surveys were intended to observe bats emerging from buildings to determine whether roosts were present

and to identify species and numbers. They involved setting up infrared or thermal cameras and bat detectors around the target building(s).

- **Dawn back-tracking surveys** – Conducted before sunrise, these surveys followed bats returning to their roosts to locate entry points that might not be apparent at dusk. Surveyors walked routes around the buildings, listening for bat calls and watching for bats entering structures, using thermal scopes for spot checks and IR cameras in selected locations.
- **Static acoustic monitoring** – Passive bat detectors were deployed at 16 locations between May to September to record bat calls. This long-term monitoring helped identify species using the area, providing information on use of the Site outside of the dusk/dawn observation timings.

C.4 Scaled plan/map of survey area

See Figures 1-3 at bottom for aerial views of the surveyed area.

C.5 Site/habitat description (relevant to bats)

The c. 32 hectare (ha) Site is located east of the city of Newport. A review of aerial photographs and OS maps shows that the Site is bordered to all directions by the wider Llanwern Steelworks site, with the A4810 road 200m to the south, and the Tata exchange railway sidings c.330m north, which are separated from the mainline railway by a (c. 100m wide) woodland strip.

The Llanwern Steelworks site is bordered by industrial landscapes to south, east and west, with agricultural fields to the north beyond the main line railway. The Gwent levels are c.930m south and the Severn Estuary is located approximately 3km to the south.

The CDM boundary comprises 27 buildings and structures within the north-west of Llanwern steelworks complex, located around the Hot Mill. The Hot Mill occupies the majority of the Site area, with a footprint of approximately 11.6 hectares. Including all sections it is approximately 860m long, 30m high and between 60-195m wide. Surrounding the Hot Mill are a number of structures ranging from single storey buildings which were used as offices, to four storey concrete cooling towers and water treatment plants. The majority of the land between buildings is bare ground or hardstanding in the form of slag, gravel or tarmac. Scrub, ruderal and ephemeral vegetation has begun to colonize the mounds of fuel ash/slag and the edges and cracks within the hard standing and bare ground.

Site includes settlement tanks for treatment of oil effluents. An ornamental pond used by geese is present to the north-east.

The site features areas of habitat suitable for foraging by a range of bat species. Specifically, the dry lagoon in the north, channels and areas of grassland around the operational areas of the site. In the vicinity of the site there are blocks of woodland, with coastal grazing marsh to the south of the site.

The former Hot Mill is a large industrial structure constructed of steel frameworks, concrete and corrugated metal or asbestos cladding. The surrounding buildings are predominantly single storey brick built offices, substations and workshops with flat bitumen covered roofs.

The buildings are in various states of dereliction with gaps under corrugated sheeting, broken windows, open doors, and dark interior voids providing potential bat roosting features. See Appendix B of the Bat Activity Survey Report for pictures and descriptions of each building.

C.6 Field survey(s)

See pages 7-14 of the Bat Activity Survey Report for full methodologies.

Table 5 – Summary of surveys completed

Date of survey	Survey type	Details
26 Mar 2024	Preliminary roost assessment (PRA)	External inspection of 28 buildings across the steelworks to identify potential bat-roosting features and signs of bat activity (such as droppings). Buildings B15, B16, B18, B20 and B22 were identified as roosts during this initial PRA.
12 Dec 2024	Internal PRA – Hot Mill motor rooms	Internal inspection of the Hot Mill motor rooms (building 10A) using torches and an endoscope to search for roosting bats and evidence of bat use. Findings prompted further hibernation surveys.
12 Dec 2024 – 7 Mar 2025	Winter hibernation survey	Hibernation survey of the Hot Mill motor rooms and basement (building 10A). Surveyors searched for hibernating bats and used static detectors; two dead bats (a pipistrelle and a brown long-eared) were found and bat calls of both species were recorded.
22 May – 1 Aug 2025	Updated PRA building inspections	Nine visits were carried out to inspect 33 buildings/structures internally and externally. Visual inspections recorded potential roost features, access points and signs (droppings, staining) to inform subsequent survey requirements.
15 May 2025	Dusk emergence survey	First dusk survey covering both the Hot Mill and Slab Mill (buildings B10A, 10B, 10C, 10D, B12). Thermal cameras and bat detectors were used to observe the building.
22 May 2025	Dusk emergence survey	Dusk survey of Building B13 (moderate roost potential). Two surveyors used infrared cameras and bat detectors to watch for bats emerging from fascia boards and other likely entry points; conditions were

		partly cloudy and 12 °C at the start.
3 Jul 2025	Dusk emergence survey	Second dusk survey of Building B13. The methodology replicated the 22 May survey; the survey ran from 21:02 to 23:02 under clear skies and light winds.
16 Jul 2025	Dusk emergence survey	Second dusk survey covering both the Hot Mill and Slab Mill (buildings B10A, 10B, 10C, 10D, B12). Thermal cameras, IR cameras and bat detectors were used to observe the building; light rain occurred during part of the survey.
17 Jul 2025	Dusk emergence survey	Dusk survey of Building B16. Three infrared cameras and paired bat detectors monitored the building from 20:51 to 23:21 under cloudy conditions.
24 Jul 2025	Dawn back-tracking survey	Dawn survey of the Hot Mill and Slab Mill. Two pairs of surveyors walked along the northern and southern sides of the buildings from 03:23 to 05:45 to observe bats returning to roosts. Thermal monoculars and infra-red cameras were deployed to record activity.
6 Aug 2025	Dusk emergence survey	Second dusk survey of Building B16. Multiple infrared cameras and bat detectors were used; the survey ran from 20:22 to 22:52 under partly cloudy conditions.
22 May – 8 September 2025	Static acoustic monitoring	Passive bat detectors were deployed across various sections of the Hot Mill (B10A motor room, slab yard motor room, basement and north cellar), the reheat furnace offices (B10C), the discharge bay (B10B), the Slab Mill (B12), Building 16, Buildings 9B/9C and a nearby woodland strip. Detectors were rotated over 109 nights to record bat calls and identify species.

C.7 Survey Results.

See Figure 2 for Locations of Identified Bat Roosts.

Preliminary roost assessment / building inspections

Table 6 - Bat roost suitability of buildings following PRA

Category of suitability	Building number	Number in category
None	0	0
Negligible	B3A, B3B, B4A, B5, B7A, B7B, B9E, B28A, B28B, B28C, B28D.	11
Low	B2, B4B, B6, B8, B9D, B10B, B11, B17, B19, B20, B21.	11
Moderate	B1 and B9A	2
High	0	0
Confirmed	B9B, B9C, B10A, B10C, B12, B13, B16, B18, B22.	9

The following evidence of bats was identified during the PRA surveys, the evidence for each is set out in Appendix B of the Bat Activity Survey Report and summarised as follows:

- B9B – 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;
- B9C – evidence of bats in the form of droppings of a size, shape and consistency for lesser horseshoe were identified in a boiler room on the southern elevation, accessed via an open doorway. Approximately 70 droppings were identified in two concentrations, one in each of the two small rooms accessible via the open door;
- B10C - evidence 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 Mill (B10A) is via a broken window but is also internally connected to the main hall of the Hot Mill;
- B16 - evidence of bats in the form of c. 100 droppings of a size, shape and consistency for lesser horseshoe were identified inside the building, with concentrations in three rooms in the south section near the south-eastern corner. Droppings were found on floor areas under missing inner ceiling panels. Flight access to the building was via broken windows on the western and eastern elevations. 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;
- B18 – this building was confirmed as a bat roost after the 2024 PRA, when droppings consistent with a pipistrelle species were identified in the porch. No additional findings in 2025;

- B20 – this building was confirmed as a bat roost after the 2024 PRA, when droppings consistent with a pipistrelle species were identified in two of the office rooms. No additional findings in 2025;
- B22 – evidence of bats in the form one dead common pipistrelle bat found inside 2025. Reports of bat activity inside from staff 2024 and 2025. Bat droppings were found 2024.

Emergence / dawn re-entry survey

Surveys

In total seven of the 33 buildings within the survey area were subject to emergence or dawn re-entry surveys in 2025. These are buildings 10A, 10B, 10C, 10D, 12, 13, and 16.

These buildings were chosen as works are due to start on them in 2025/2026, whilst other buildings are not due to be subject to any works until 2026-2028.

Building B16, although outside the Site area where demolition will take place, was subject to further survey after it was identified as a potential option for mitigation.

End of survey stills from IR and Thermal cameras have been provided in Appendix C and D of the Bat Activity Survey Report to illustrate the lighting levels of the footage at the darkest point. These stills also illustrate what parts of the building elevations that were covered by the camera footage.

Results

Summary of bats seen to either emerge or return to roost during the various surveys are set out in Table 7 below. Photographs of access-points from which bats emerged are set out in Appendix G of the Bat Activity Survey Report.

Common pipistrelle and lesser horseshoe bats were seen to emerge or return to roost on five buildings covered by the surveys. The majority of these were associated with building 10A, where up to 18 common pipistrelle bats were identified emerging from a large open doorway on the northern elevation during the first emergence survey. Some of these may have been exiting after entering from elsewhere, however the majority are believed to be emergences, as nine were identified returning to roost during the dawn back-tracking survey, at six locations around the former hot mill.

Locations of all roosting locations identified can be seen in Figure 2 (or Figure 12 of Bat Activity Survey Report). It should be noted that for some species the exact roosting location has not been identified, as once inside the building there are many opportunities for an individual or small numbers of bats to roost, particularly crevice dwelling species such as common pipistrelle.

Table 7: Emergence and Dawn survey results

Survey date	Building #	Bat species	No. seen	Time and activity	Access point elevation	(Likely) roosting areas
B10A-D/B12						
15/05/2025	None	None	None	N/A	N/A	N/A
16/07/2025	B10A	Common pipistrelle	18	21:18-22:26. Likely emergence for some	North elevation Large ramp opening	Unknown locations (likely multiple) inside Hot Mill building.
16/07/2025	B10A	Common pipistrelle	4 Not proof of roost	Entering 21:18, 21:19, 21:23 and 21:24.	North elevation Large basement opening	None. This is believed to be entry for foraging inside the building.
24/07/2025	B10A	Common pipistrelle	1	Re-entering 03:29.	South elevation Concrete Bay	Unknown location inside Hot Mill building
24/07/2025	B10A	Common pipistrelle	1	Re-entering 04:44	North elevation Metal structure	Unknown location inside Hot Mill building
24/07/2025	B10A	Common pipistrelle	3	Re-entering 04:51, 04:53 and 04:54.	North elevation Corner	Unknown location inside Hot Mill building
24/07/2025	B10A	Common pipistrelle	1	Re-entering 05:01	North elevation Mid Part	Unknown location inside Hot Mill building
24/07/2025	B10A	Common pipistrelle	2	Re-entering 05:03 and 05:04	North elevation Mid Part	Unknown location inside Hot Mill building
24/07/2025	B12 Slab Mill	Common pipistrelle	1	Re-entering 05:40	East elevation NE corner of Slab Mill	Gap in ceiling for wires
17/07/2025	B10C	Unknown species (likely to be lesser horseshoe based on static detector analysis)	1	Entry and emergence via broken window (repeated several times) 22:23-22:24	West facing broken window.	Inside disused office building.
B13						
22/05/2025	B13	Common pipistrelle	1	Emergence 21:38	NE corner fascia board	Gap under fascia board or wall cavity behind

Survey date	Building #	Bat species	No. seen	Time and activity	Access point elevation	(Likely) roosting areas
B10A-D/B12						
03/07/2025	None	None	N/A	N/A	N/A	None
B16						
17/07/2025	B16	Common pipistrelle	2	Emergence 21:47	Inner courtyard	Unknown but assumed to be in external roof areas of courtyard.
06/08/2025	None	None	N/A	N/A	N/A	None

Commuting and foraging activity

During the surveys activity was generally low, with commuting and foraging observed by a small number of bats of the following species: common pipistrelle, noctule, soprano pipistrelle, lesser horseshoe and brown long-eared.

Static detector surveys

Deployments

Due to the scale of the Site and likely opportunistic use of buildings by bats, static detectors were deployed in several buildings and external locations for a total of 109 nights between 22 May and 8 September 2025. A summary of key findings is laid out in Table 8 below.

Deployments 11 and 12 were located in the woodland strip in the north of the survey area. They were located here after it was identified this may be a suitable location for part of the mitigation strategy, and it was determined that determining activity in this area would be beneficial. During the course of the 12 night deployment they recorded lesser horseshoe, brown long-eared, common pipistrelle, soprano pipistrelle, Nathusius pipistrelle (*Pipistrellus nathusii*) noctule, serotine, Myotis species and barbastelle (*Barbastellus barbastellus*).

Interpretation of static results

In addition to the number of recordings per deployment the analysis of the static results focussed on lesser horseshoe and brown long-eared bats as both species have been recorded inside the buildings surveyed.

It was deemed that any activity before or after the official sunset or sunrise could be seen as indication of a bat roost (as very likely to be inside the building at that time), and that any activity within 1 hour of the official sunset or sunrise time could indicate the presence of a roost, although bats may also be roosting nearby.

For lesser horseshoe bats inside building B10A it was found that recordings were made inside B10A Slab Mill Motor Room Basement 08/06/2025 at 20:59, 21:17 and 21:18. The official

sunset was 21:26 so the recordings were made 25 minutes, 9 minutes and 8 minutes before sunset indicating likely day roosting.

Recordings were made inside B10A Basement Level by Cellar Stairs 20:58 30/05/2025 (official sunset 21:17) 19 minutes before sunset and 21:02 02/06/2025 (official sunset 21:21) 19 minutes before sunset indicating likely roosting.

Recordings were made inside B10C The Reheat Furnace Offices 21:18 09/07/2025 (official sunset 21:27) 8 minutes before sunset, 21:14 10/07/2025 (official sunset 21:27) 13 minutes before sunset, and 21:13 13/07/2025 (official sunset 21:24) 11 minutes before sunset indicating likely roosting.

Additional activity within 1 hour after official sunset or 1 hour before official sunrise was noted inside B9C, B10C The Reheat Furnace Offices, B10A Slab Mill Motor Room Basement, B10A Basement Level by Cellar Stairs, B10A North Cellar Fire Zone and B16 The Lab Room 20.

For building 9B, the results were affected by a door opening (likely due to strong winds) next to the deployment in a dark corridor under an opening into the roof void. This allowed for light and draught ingress.

For brown long-eared bats, no activity inside buildings was noted before or after the official sunset times or within 1 hour after official sunset or 1 hour before official sunrise.

Table 8: Summary of static detector results

Deployment number	Dates of deployment	Location of deployment (see Figures 11 for locations)	Number of nights deployed	Summary of results Number of recordings
1	27/05-15/06/2025	B10A – hot mill motor room	19	No bat recordings.
2	27/05-15/06/2025	B10A - slab mill motor room basement	19	15 lesser horseshoe bat
3	22/05-12/06/2025	B10C – reheat furnace offices	21	210 lesser horseshoe bat
4	22/05-16/06/2025	B10A – hot mill basement (north side)	25	10 lesser horseshoe and 484 soprano pipistrelle,
5	26/06-30/06/2025	B10A – hot mill north cellar fire zone 7	4	11 lesser horseshoe bat and 42 common pipistrelle
6	26/06-02/07/2025	B10C – reheat furnace offices	7	12 lesser horseshoe bat
7	26/06-03/07/2025	B16 – lab room in south-eastern corner	8	1 lesser horseshoe bat
8	30/06-03/07/2025	B10A - hot mill north cellar furnace	4	8 common pipistrelle
9	03/07- 15/07/2025	B10C – reheat furnace offices	12	96 lesser horseshoe bat
10	03/07- 15/07/2025	B16 – lab room in south-eastern corner	12	19 lesser horseshoe bat
11	03/07- 15/07/2025	Woodland strip between train tracks to north of survey area Mitigation Location 1	12	No activity that could determine roosting (as located outside). To assess location for mitigation. 6,037 common pipistrelle, 2,141 soprano pipistrelle. 1,726 Nyctalus species, 34 Myotis species, 22 brown long-eared, 6 serotine, 4 lesser horseshoe bat, 3 Nathusius' pipistrelle
12	03/07- 15/07/2025	Woodland strip between train tracks to north of survey area Mitigation Location 2	12	No activity that could determine roosting (as located outside). To assess location for mitigation. 16,558 common pipistrelle, 13,939 Nyctalus species, 199 soprano pipistrelle. 160 brown long-eared, 114 Myotis species, 18 serotine, 23 lesser horseshoe bat, 1 barbastelle.
13	17/07- 24/07/2025	B10A – hot mill motor room	6	No bat recordings
14	17/07- 24/07/2025	B10C – reheat furnace offices	6	Static failed
15	17/07- 24/07/2025	B12 – slab yard (under canopy)	6	1,233 common pipistrelle, 12 soprano pipistrelle. 4 Nyctalus species, 2 Myotis species, 2 brown long-eared
16	17/07- 24/07/2025	B10B – discharge bay	6	3,266 common pipistrelle, 64 soprano pipistrelle. 48 brown long-eared, 2 Nyctalus species, 2 Myotis species
17	25/07- 31/07/2025	B16 – lab room in south-eastern corner	6	12 lesser horseshoe bat
18	25/07- 31/07/2025	B10A – hot mill motor room – west side two-storey building	6	392 common pipistrelle, 6 soprano pipistrelle
19	26/07- 31/07/2025	B10A – hot mill – ramp by opening on north side (external)	6	No activity that could determine roosting (as located outside). However, bats appear to use this opening for commuting in and out of the building.

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Deployment number	Dates of deployment	Location of deployment (see Figures 11 for locations)	Number of nights deployed	Summary of results Number of recordings
				5,818 common pipistrelle, 355 brown long-eared, 352 Nyctalus species, 184 soprano pipistrelle 14 Myotis species, 11 lesser horseshoe bat.
20	26/07- 31/07/2025	B10A - slab mill motor room basement	5	5 common pipistrelle
21	26/07- 31/07/2025	B10A – hot mill motor room – east side two-storey building	5	7 common pipistrelle
22	06/08- 26/08/2025	B9C – external boiler room	20	49 lesser horseshoe bat
23	26/08- 09/09/2025	B9B – dark corridor	13	1 lesser horseshoe bat

C.8 Interpretation/evaluation of survey results

The Llanwern Hot Mill surveys recorded only small numbers of bats and with no evidence of maternity roosts. The roosts identified were day/night roosts and hibernation roosts.

Lesser horseshoe bats:

- B10A - evidence of day roosts was found inside the building in the form of static sound files recorded before the official sunset time inside the basement level by cellar stairs 30/05/2025 and slab mill motor room basement 08/06/2025.
- B10C - evidence of day and night roosts was found inside the building in the form of droppings (typical in size, shape and location of the species), chewed butterfly wings (insect prey) and static passive acoustic monitoring.
- B16 - evidence of a day roost was found inside the building in the form of droppings (typical in size, shape and location of the species), and static passive acoustic monitoring.
- B9B - evidence of a day or night roost was found inside the building in the form of droppings (typical in size, shape and location of the species).
- B9C - evidence of a day and night roost was found inside the building in the form of droppings (typical in size, shape and location of the species) and static passive acoustic monitoring.

Evidence of lesser horseshoe has been recorded in buildings 9B, 9C, 10A (north side basement, slab yard motor rooms, north side cellar fire zone), 10C, and 16.

Droppings have been identified in 9B, 9C, 10C and 16, whilst evidence for 10A comes from static recorders. The numbers of droppings identified are generally small in concentration, suggesting individuals or small numbers. The static detectors identified lesser horseshoe calls prior to sunset in buildings 10A (slab mill motor room and northern basement level) and 10C confirming day roosting in these locations. The bats are using a number of the structures within the Survey Area as a combination of day and night roosts. Whilst no evidence of hibernation was identified over winter 2024, it is acknowledged that only part of building 10A was included in that survey, and there is potential lesser horseshoe may use areas of this building for hibernation. Notably the basement in the slab mill motor room, and under the northern half of 10A. Whilst not providing optimal hibernation conditions (generally quite dry), they have potential to support small numbers of bats.

The lesser horseshoe roosts onsite, comprising day, night and potential hibernation, are of **local value**, taking into account the small numbers and geographic location.

Common pipistrelle

- B10A - evidence of day roosts was found in the form of up to 18 bats that were found to be commuting out of the building using the large opening at the north facing ramp during the emergence survey 16/07/2025, and 9 bats entering the building during the dawn back-tracking survey 24/07/2025 (into six different locations on the building). The 18 bats identified exiting on 16/07/2025 may not all have been roosting in building, as there is high potential later bats were entering the building from elsewhere and foraging inside.
- B12 - evidence of a day roost was found in the form of one bat entering the building during the dawn back-tracking survey 24/07/2025
- B13 - evidence of a day roost was found in the form of one bat emerging from the building 22/05/2025,
- B16 - evidence of a day roost was found in the form of two bats emerging from the building 17/07/2025.

- B22 - evidence of a day roost was found in the form of a dead common pipistrelle bat found inside the building 26/06/2025.

Common pipistrelle day roosts were recorded in buildings 10A (maximum 13 bats), 12 (max 1), 13 (max 1), 16 (max 2) and 22 (1 dead bat during PRA). The 18 bats identified exiting the open doorway on 16/07/2025 emerged between 21:18 and 22:26 (between four minutes before sunset and 1 hour 4 minutes after sunset). Given this spread in emergence times, the fact the average emergence times for common pipistrelle are 6.9-42.7 minutes after sunset (Collins, 2023), and the open nature of the building, it is considered unlikely that all of these observations are of bats roosting within the building, and likely include individual(s) which are entering the building from one of the many possible entry points, and flying out after foraging. For this reason the peak count is based on the dawn back-tracking survey, where 13 bats were identified re-entering into six different locations on both north and south of the building. As the maximum number of bats is less than 20 (Collins, 2023), and these are spread throughout the large building, there is no evidence that a maternity roost is present.

Evidence of winter use of the building was confirmed during the hibernation surveys of the motor room in building 10A (RSK Biocensus 2025a), when a dead pipistrelle bat was found in the basement, with common pipistrelle calls recorded on static detector between December 2024 and February 2025.

Taking into account the low numbers of bats identified, the common pipistrelle roosts comprising day and hibernation are considered to be of **Site value**.

Brown long-eared

Whilst not confirmed to be roosting within any of the buildings during the emergence / backtracking or static detector surveys, brown long-eared bats have previously been confirmed to roost within building 10A during the winter, specifically in the south-eastern corner (motor rooms) where a dead bat was identified in December 2024, and recordings were made in January 2025. During the summer activity surveys brown long-eared were encountered around the site on emergence and dawn backtracking surveys, and were recorded on five of the static bat detector deployments, primarily around the former Hot Mill (buildings 10A, 10 B and 12), suggesting that a small roost is present nearby.

One dead brown long-eared bat was found inside building 10A (motor room, south-east corner) during hibernation surveys in December 2024, and two recordings were made inside December 2024 and January 2025. Whilst not confirmed to be roosting within any of the buildings during the 2025 emergence / backtracking or static detector surveys, brown long-eared were encountered on most deployments, and were recorded on five of the static bat detector deployments, primarily around the former Hot Mill (buildings 10A, 10 B and 12), suggesting that a small roost is present nearby.

Given the scale of the building, the quiet and highly directional call of brown long-eared bats and confirmation of roosting for at least part of the year, it is highly likely that small numbers of bats roost within 10A outside of the winter as well.

The brown long-eared roosts onsite, comprising day and hibernation roosts, are of **site value**.

D.1 Short-term impacts: disturbance

The demolition and clearance works will unavoidably produce disturbance to roosting bats through increased human activity, machinery noise and vibration, and temporary lighting.

Modification works to B16 may cause short term-disturbance if bats present at the time.

D.2 Long-term impacts: roost modification

N/A

D.3 Long-term impacts: roost loss.

Demolition will result in the complete loss of roosts used by common pipistrelle, lesser horseshoe and brown long-eared bats within buildings 9B, 9C, 10A, 10C, 12 and 13 and hibernation roosts used by common pipistrelle and brown long-eared bats. Without mitigation this would constitute a permanent loss of roost sites at a local scale. All three species are widespread locally, and the desk study results show that there are multiple known roosting sites for each species within 5km, including maternity roosts of each species. The 2017-2018 data set from area to the north also shows that common pipistrelle have been identified in trees to the north of the survey area.

The retention and enhancement of Building 16 as a temporary mitigation, provision of bespoke bat boxes and roost structures, and timing of works will ensure no net loss of roost resource at the site and allow populations to continue using the wider landscape's to be taken into account at local, regional, and national level.

D.4 Long-term impacts: fragmentation and isolation.

The proposed works does not involve the removal of trees or hedges and is therefore unlikely to cause the loss of important commuting areas along vegetation.

D.5 Post-development interference impacts.

This licence covers demolition only, however it is acknowledged that there will be a future application for redevelopment of the Site.

Once demolition is completed, there will be no roosts retained within the CDM boundary, and building 16 is located 200m north of this area, so there will be no interference.

Any future application on the site will need to consider the presence of bats and known bat roosts. A sensitive lighting scheme will need to be created at a later stage as part of the application for further consents, once the development plans are finalised.

It is noted that there is a longer term intention to create a new dedicated bat house on land within Tata's landholding to the north, within a strip of woodland north of building 16 and the railway line. This requires planning permission and so is not included in this application, as the timescales for planning and development do not meet with the demolition programme. An application may be made in future to either amend the licence, or for a new licence that will incorporate the new bat house as a permanent mitigation solution, and may include the demolition of building 16. Timescales for this are not known, and any future application will need to assess these impacts and provide appropriate mitigation to compensate.

D.6 Predicted scale of impact Headline conclusion

- The buildings to be demolished hold **small day/night roosts** of common pipistrelle, brown long-eared bat and lesser horseshoe, and hibernation roosts of common pipistrelle and brown long-eared bat. The report assigns **site value** to the common pipistrelle and brown long-eared roosts, and **local value** to the lesser horseshoe roosts.
- With the Building 16 mitigation roost(s) and treeline bat boxes in place **before** demolition, the **residual impact** is predicted to be **negligible at county and regional levels**, and **negligible-minor at the site/local level** during the works, reducing to **negligible** post-mitigation.

By species (site → local/county → regional)
Common pipistrelle (*Pipistrellus pipistrellus*)

- **Site level (within the Hot Mill complex):** Loss of several **small day roosts and a hibernation site / winter use** (e.g., B10A, B12, B13) with maximum observed numbers is 18 (13 confirmed to be roosting); temporary disturbance during demolition. **With mitigation** (dark internal spaces and boxes in Building 16 + treeline boxes) the **residual effect is minor** → **negligible** once new features are available.
- **Local/county level (Newport / Gwent):** Displacement of a **very small fraction** of the local population; **residual negligible** given species ubiquity and replacement roost capacity.
- **Regional level (SE Wales): Negligible;** numbers involved are extremely small relative to the regional population.

Lesser horseshoe bat (*Rhinolophus hipposideros*)

- **Site level:** Loss of **small day/night roosts** (9B, 9C, 10A, 10C) with **sparse droppings** and calls indicating **individuals or very small groups**; potential use of cool basement areas in 10A in winter. Building 16 is to be **engineered** to mimic suitable conditions (darkness, connectivity, stable microclimate, temperature variation) so the **residual site-level effect is minor**, trending to **negligible** after settlement into new features.
- **Local/county level: Negligible–minor** short-term while bats locate/settle in the mitigation roost(s); **negligible** once mitigation is established.
- **Regional level: Negligible**, given the very small number of bats affected.

Brown long-eared bat (*Plecotus auritus*)

- **Site level:** Evidence limited (one carcass, occasional calls), suggesting **very low numbers** and likely **small day/hibernation roost** nearby. Replacement features (quiet voids and boxes) mean **residual site-level effect negligible**.
- **Local/county & regional: Negligible** due to low numbers affected and provision of replacement features.

E Works to be undertaken

E.1 Capture and exclusion (if applicable).

Toolbox talks: Prior to the start of works, toolbox talks will be given to the demolition team. The talks will be repeated as the demolition process will span over three years, circumstances may change and staff will vary. The talks will outline detailed precautions needed during works and actions to take if bats or evidence of bats such as bat droppings are found during works. The toolbox talks will identify where bats are known to be, where they may be found and necessary precautions to take. A written record will be kept on attendance.

H&S risks due to contaminants: Historic use of the Site has provided some hazards including asbestos (purported to be the largest concentration in Europe), numerous other contaminants and potential for pyrophoric materials to be present.

A supervised soft strip will not be possible for the Hot Mill (10A, 10B, 10C 10D and 12 on Figures) and some of the adjacent buildings due to health and safety. The buildings on the Site consist of large amounts of asbestos that does not only make up the fabric of the buildings, but has also been disturbed over decades. In addition, the Site is contaminated in multiple other ways and poses multiple other health and safety risks to the ecologists that would be required to supervise the works. Supervision is likely to be limited to pre-demolition checks of rooms / buildings in most cases, as once demolition starts in an area, ecologists may not be able to attend.

Timing of works: Demolition of 10B (no bat roosts) and outer two bays of 12 do not require a licence, provided they remain more than 50m from identified roosts. The bat roost under 12 is within the outer wall of 10A, and therefore the outer two bays can be removed whilst retaining the 50m buffer. Neither of these portions of the building are considered to have hibernation potential.

Removal of existing machinery within the large motor rooms in 10A will be carried out using existing cranes inside the building, with machinery picked up and deposited at roller doors for removal outside to be broken up. These will happen in areas that have 24 hour lighting and limited roost potential so may happen pre-licence subject to pre-works inspections of the connected cellars / basements

underneath these areas confirming absence of bats that could be disturbed by the works. If bats are present, they will need to wait until licence is in place and appropriate time of year.

Once licence is in place, demolition will continue on 10B, 12 and buildings to south of 10A including 13, 28A-D. No timing constraints are proposed for these buildings due to limited hibernation potential.

Removal of asbestos, followed by demolition of 10A, 10C and 10D will start between April to October, to avoid periods when bats may be hibernating in these sections (primarily basement / cellars within 10A). Works are currently proposed to start on these elements from April 2026. Once started, and taking into account the 3year timescale for demolition, works will not stop during the winter months. However, inspections of areas suitable for hibernation will continue (where safe to do so once demolition starts) and if any hibernating bats are found, works which could disturb, injure or kill hibernating bats would need to be halted until the bats have moved on of their own accord (which could be several months).

Demolition of other buildings have no timing constraints, subject to pre-demolition inspections and surveys where possible.

Hibernating bats will not be handled, unless works have caused conditions where the bats would be in danger of harm to leave them in place. In which case they will be carefully collected following the bat rescue process outlined below.

Exclusion of bats: As a general principle the bats are likely to disperse due to the noise and vibrations that the demolition works will cause and an exclusion process will therefore not be necessary. Demolition of the Hot Mill (10A, 10B, 10C 10D and 12 on Figures) will be a very time consuming process that will span over three years. The demolition works of the Hot Mill itself will cause a high level of noise and vibrations. As the site consists of a complex of buildings it is likely that any bats that have been disturbed by the works will be able to take temporary shelter in another part of the same building or in an adjacent structure. The building will gradually become less suitable for bat roosting as the demolition progresses. Due to the open nature of the Hot Mill (10A, 10B, 10C 10D and 12 on Figures) exclusion is not possible. Where a room can be fully inspected prior to demolition, and only a small number of reachable potential access points exist, these will be blocked prior to demolition to ensure bats cannot enter.

Soft strip and 'overnight rest': All smaller buildings with known bat roosts will be soft stripped under remote instructions of the Named Ecologist or Accredited Agent. These ecologists will be on standby for advice and support, but they are unlikely to be able to directly supervise the works. The demolition team will conduct the soft stripping under remote instructions, and the buildings will then be left for an 'overnight rest' so that any bats that may be hiding inside wall cavities are allowed to disperse overnight before the demolition is completed.

Bat rescue: As part of the instructions given during the toolbox talks, works will be paused if bats should be found and are in need of rescue due to animal welfare reasons. Advice will be sought from the Site Manager in charge of health and safety of ecologists before any bat rescue attempts will take place and full asbestos PPE will be worn as necessary.

Any bats rescued will be captured by hand, placed in cloth bags / pet carrier for relocation to the retained mitigation roost in Building 16, either inside the building (lesser horseshoe and brown long-eared bats) or external bat boxes (common pipistrelle bats). They will be placed in a ventilated pet container and kept in a warm and quiet location if they cannot be relocated straight away. The bats will only be handled by an experienced and licenced bat handler wearing gloves and a face mask (see section E5 for full details on biosecurity).

Extra precautions will be taken if a lesser horseshoe bat should need handling as they are known to have frail rib cages and experience high stress levels. This species will only be handled if the animal would be unsafe to leave in situ or to leave of its own accord. Lesser horseshoes should only be transported in a manner so that they are allowed to hang upside down.

Any bats that are captured will be assessed before release to ensure they are in a fit condition. Any that are injured or unfit will be taken into veterinary care and/or may be taken into care by a bat carer. The named ecologist and accredited agents have experience of bat care. Any bats taken into care, consideration should be made for health and safety of the vet and/or bat carer as the bats may be covered with asbestos fibre dust and/or other harmful dust.

E.2 Bat roosts and habitat

E.2.1 In-situ retention of roost(s)

N/A. All buildings on site will be demolished at some point.

E.2.2 Modification of existing roost(s)

Building 16 (a former Lab), which contains a day roost of common pipistrelle (max 2) and lesser horseshoe bats (estimated max total of 5 across the site), will be retained and refurbished as the primary mitigation roost. The disused flat roofed one storey building is square shaped and has a small central inner courtyard.

The lesser horseshoe bats are accessing the building via broken windows (and occasionally open windows as these open with strong winds and are then closed again by site security). There are six existing broken / open windows (facing west, southwest and southeast). The bats are roosting in a void with an internal inner height of about 1m located above false inner ceiling panels. Evidence of bats has been identified in three rooms in the south-eastern corner of the building, where ceiling panels have been removed / fallen down, exposing the void. The void is likely to be internally connected throughout the building, although this is not confirmed and it is very cluttered with ventilation machinery throughout. The rooms within the building have large floor to ceiling windows, which means the majority of the interior is unsuitable to support day roosts as well lit.

The common pipistrelles are believed to be roosting in external roof areas under gaps of the bitumen roofing felt of the inner courtyard.

- **Enhancement of Building 16 (The Lab)** – This existing structure will be modified to serve as a replacement roost. Building 16 has a similar structure to Building 10C (to be demolished) which is also used by lesser horseshoe bats, but it is currently too light. To make it suitable, windows will be boarded or painted black (using an odourless and quick drying paint) to create darker areas, a new access point will be added in the north-east corner (as closer to the Northern treeline). Some of the internal doors and ceiling panels will be removed to improve connectivity between the rooms. Two cooling towers will be built inside one of the rooms to provide roosting areas with different temperatures. Two Beumaris bat box midi and two Schwegler 1FF boxes (or equivalent models) will be installed on external and internal walls of the building. These modifications aim to create dark, interconnected spaces with varied microclimates for lesser horseshoe bats, pipistrelles and brown long-eared bats. See Figure 7 for bat mitigation features.

Together, these measures are intended to ensure that new roosting habitats are available for bats displaced by demolition.

E.2.4 Maintenance &/or modification of new and existing habitat

Building 16 will be inspected annually by a licensed ecologist during the first 5 years after the bat mitigation features have been installed to ensure its continued suitability, with any necessary repairs carried out promptly.

Existing trees, scrub and hedgerows outside of the CDM boundary will be retained during the demolition works to allow for a commuting corridor for bats to the northern treeline.

E.2.3 New roost creation

- **Installation of additional bat boxes in trees** – To meet planning policy requirements, five bat boxes (a mix of Schwegler 1FN and 1FF and Bark Boxes hibernation bat boxes, or equivalent models) will be fitted on mature trees along the northern treeline of the site. The bat boxes will be installed under the advice of a licensed bat ecologist. The bat boxes supplement the roosting opportunities provided within Building 16 for common pipistrelle and brown long-eared bats. See Figure 8 for location of bat boxes in trees.

For this application B16 is put forward as the primary mitigation. There is an intention to design and apply for planning permission for a new “bat house” to be located within the woodland belt between the railway tracks to the north of B16. This is to future proof the mitigation strategy, as eventually remaining buildings within the site, which are mostly disused, will be demolished to allow redevelopment of the entire area. The bat house requires formal planning permission and therefore was not possible to include within the timescales required to start the demolition process. Should planning for the new building be achieved, a licence amendment / new licence will be submitted to propose the bat house as the permanent mitigation for the overall site. This will likely also need to be informed by additional surveys on buildings not currently covered, and therefore timescales for this are not known.

E.2.5 Scaled maps/plans

See Figures 1 to 8 appended to this licence.

E.3 Mechanisms for ensuring delivery of mitigation and compensation measures

The applicant confirms that all mitigation features will be installed.

The Named Ecologist or Accredited Agent listed on the licence documentation will determine compliance with all mitigation and compensation measures. The Named Ecologist or Accredited Agent will brief demolition contractors on the method statement. A copy of the EPS licence and method statement will be kept on site at all times. Pre-start meetings will be held with the principal contractor to schedule works and agree exclusion and timing. The site manager will maintain a works log and photographic record of mitigation installation.

Where additional surveys are proposed, the results of these will be shared with NRW prior to continuing with demolition on those buildings, and any alterations to the licence that are required will need NRW approval and sign off.

Post-construction, responsibility for maintaining the mitigation roost and boxes will transfer to the site owner, with annual inspections specified in Section F.1. for ensuring delivery of mitigation and compensation measures.

E.4 Mitigation contingencies

If unforeseen roosts are discovered during works (e.g., previously undetected species or roost type), all works will cease immediately and NRW will be consulted. The Named Ecologist or Accredited Agent will assess the situation and implement additional exclusion or rescue measures as necessary. Works may be rescheduled to avoid sensitive periods or alternative designs considered. Should additional mitigation be required, this could be provided in the form of additional bat boxes, a new building (long term intention) and potentially utilising additional buildings outside the CDM boundary on a temporary basis.

Should permanent retention of Building 16 prove unfeasible, alternative roost structures of equal suitability will need to be provided. This would require consultation with NRW. A contingency fund will be set aside for additional mitigation should survey results identify higher bat usage than currently recorded.

E.5 Biosecurity risk assessment

All site works will comply with the latest UK and Welsh Governments guidance along with non-governmental organisations, such as the Bat Conservation Trust and IUCN for prevention of spreading Covid-19, white nose syndrome and rabies that will be adhered to by the Named Ecologist and Accredited Agent(s).

The following procedures will be implemented;

1. Hands will be sanitised upon arrival;
2. Gloves will be worn at all times. Where bats are to be handled, the thickness of glove must be suitable for the bite power of the species being handled. This will vary from common pipistrelle (Nitrile gloves) to larger bats (leather gloves);
3. A face mask will be worn at all times where there is a risk of coming into contact with a bat (i.e. during handling).

Any bats that shows symptoms of respiratory disease, white nose syndrome or rabies would immediately be taken into care to be assessed by a veterinarian/and or bat carer.

F Post-development site safeguard

F.1 Habitat/site management and maintenance

Following completion of works, the maintenance of building will fall to Tata Steel UK. The Llanwern Steelworks is a guarded site, with 24 hour security presence, so vandalism is not envisaged. Annual monitoring by Named ecologist or Accredited Agent will identify any concerns with condition of the building, and the client will be informed of required remedial actions.

F.2 Population monitoring, roost usage etc.

Monitoring of bat activity and roost usage will be undertaken for five years post-construction. Annual surveys will be completed during the months of June-August to record species and numbers using Building 16. One internal physical daytime inspection of the building and bat boxes by a licenced ecologist with deployment of a static detector for 14 nights inside the building will be carried out. A single emergence survey will be carried out on building 16 between June and August each monitoring year.

Survey results will be reported to NRW under the terms of the licence.

Should monitoring indicate that bats are not using B16 or any features after year 3, remedial actions (e.g., modification of access points, enhancement of internal conditions) will be considered and discussed with NRW.

F.3 Post-development mitigation contingencies

If the post development monitoring results are unfavourable Tata Steel will enter into talks with NRW in regard to increasing or modifying the compensation which may include the creation of additional roosting locations or additional suitable areas of habitat for foraging and commuting bats.

F.4 Mechanism for ensuring delivery of post-development works

By agreeing to the conditions of the mitigation licence the licensee has a legal obligation to carry out the monitoring surveys recommended. Tata Steel has agreed to the mitigation specified above and remains the landowner. Delivery of the post-development monitoring works will be ensured through audit and reporting on the post-works monitoring of bat boxes by the named ecologist / accredited agent which will be contracted by the scheme project manager. Monitoring reports

utilising the NRW EPSL Monitoring Report Template will be submitted to NRW as requested within the licence conditions.

G Timetable of works.

See

Figure 3 – Plan of buildings to be covered by licence

Figure 4 – Works pre-licence approval and buffer zones

Figure 5 – Phasing of Demolition works

Work Element	Timing	Comments
Tool Box Talk and pre-works inspection.	Sep/Oct 2025 Pre Licence Works	Toolbox talk by named ecologist / accredited agent.
Equipment to be removed from Hot Mill using internal crane systems via roller doors.	Sep 2025 – Mar 2026 Pre Licence Works	Hot Mill Main Hall, Hot Mill Motor Room and Slab Yard Motor Room. Not taking out electrical cabinets or asbestos. No entry of basements, cellars or internal two storey buildings. Ecologist will inspect rooms prior to machinery being removed and if bats found with potential to be disturbed, works nearby will need to wait for licence.
Demolition starts on 10B and 12	Oct 2025- Mar 2026	Requires prior notification of demolition consent. May start pre-licence provided 50m buffers in place around roost sites. No timing constraints as negligible hibernation potential.
EPS Licence application with NRW	Sep 2025 – Jan 2025	The European Protected Species Licence (EPSL) must be in place before any demolition / asbestos removal within 50m of bat roosts.
Install bat boxes in trees	Oct 2025 – Mar 2026	To be completed before licensed works start. Installing five bat boxes along the northern treeline to enhance roosting provision ahead of demolition.
Mitigation creation – Building 16	Oct 2025 – Mar 2026	To be completed before licensed works start. Modify Building 16 to provide replacement roosts: windows boarded / painted, removal of some internal doors and ceiling panels, installing cooling towers and bat boxes.
Compliance check	Nov 2025 - Apr 2026	Named Ecologist or Accredited Agent inspection of bat mitigation features at Building 16 and tree line to verify these have been installed correctly.
Tool Box Talks and Advice for Soft Stripping	To be conducted at the start of each stage of works and for all the smaller buildings.	Toolbox talk by named ecologist / accredited agent. Ability for pre-works check / soft stripping / physical supervision will vary dependent on area. Where ecologist can't be present, advice given on what to do and check in advance, and ecologists on call during works.

		Works will need to consider bird-nesting periods for Peregrine Falcons and Seagulls (Mar–Aug).
Demolition – day-roost buildings (9B, 9C, 10B, 10C, 12, 13)	No timing restrictions for bats. May be affected by bird nesting season.	These structures support day/night roosts with small numbers of bats. They can be demolished at any time of the year following a tool box talk, soft strip under remote advice by the Named Ecologist or Accredited Agent and ‘overnight rest’ to allow for remnant bats to disperse.
Hibernation checks of basements and north cellar in 10A	Dec 2025 to Feb 2026	Checks during hibernation periods of all cellars / basements where safe to do so, to determine if bats using them during winter.
Demolition – Building 10A (hibernation roost)	Planned to start April –October 2026 To be reassessed yearly.	Building 10A has hibernation roosts in Basements (Hot Mill and Slab Yard) and the potentially in the Northern Cellars (to be confirmed via further hibernation surveys Dec 2025 to Feb 2026). Start of demolition affecting basements and cellars must avoid the hibernation period (the months of Nov-Mar). Works to also consider impacts to nesting birds that may nest on the building March to August.
Surveys of remaining buildings (1, 2, 4B, 6, 8, 9A, 9B, 11)	May – September 2026	Conduct dusk emergence surveys and/or static surveys of these buildings ahead of future demolition phases.
Ongoing demolition works	2026-2029	Once started, demolition works will take place through to end of 2028 or early 2029. Currently anticipated to finish December 2028, however with delays could continue onto June 2029. Toolbox talks, pre-demolition checks and supervision (where possible) from the named ecologist / accredited agents will continue during this time.
Post Project Monitoring	Annual visits 2026–2028	Monitoring of bat activity and roost usage will be undertaken for five years post construction. Annual surveys will be completed during the months of June-August to record species and numbers using Building 16. One internal physical daytime inspection of the building and bat boxes by a licenced ecologist with deployment of a static detector for 14 nights inside the building will be carried out. A single emergence survey will be carried out on building 16 between June and August each monitoring year.

H Land Ownership – Mitigation Site

H.1 Mitigation Site/Compensation Site Ownership

Mitigation and compensation are proposed within the Tata Steel ownership boundary and therefore no 3rd party permissions to access land will be required.

H.2 Mitigation Site/Compensation Ownership post construction

All areas used for mitigation and compensation will be retained in the ownership of Tata Steel.

I Declaration

I declare that should a licence be granted, the work as proposed in this Method Statement will be strictly adhered to. I understand that any deviation from the works as proposed in this Method Statement without agreement from NRW would result in a breach of the licence. NB. Applicants should note that it is an offence under regulation 59 of the Conservation of Habitats and Species Regulations 2017 to knowingly or recklessly provide false information in order to obtain a licence.			
Signature of the Applicant	STEVE PEMBER	Date	29.09.2025
<i>For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.</i>			X ☐
Full name in BLOCK LETTERS	STEVE PEMBER		
Signature of the Ecologist	TIM CLARK	Date	29.9.2025
<i>For electronic submissions please insert an electronic signature above or place an x in the box opposite to confirm agreement with the declarations above.</i>			X ☐
Full name in BLOCK LETTERS	TIM CLARK		

J References

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

Mathews, F., Coomber, F., Wright, J. and Kendall, T. (2018), *British Mammals 2018 – The Mammal Society's Guide to their Population and Conservation Status*. Mammal Society, Dorset.

Reason, P.F. and Wray, S. (2025 v1.2), *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats*. Version 1.2. Chartered Institute of Ecology and Environmental Management, Ampfield.

Schofield, H. (2008). *Lesser Horseshoe Bat: Conservation Handbook*.

Welsh Government (2016) Environment (Wales) Act 2016.

K Annexes

K.1 Pre-existing survey reports

Former Hot Mill, Llanwern – Bat Activity Survey Report

Llanwern Hot Mill - Preliminary Roost Assessment and Bat Hibernation Survey of the Motor room

Figures and Appendices:

Figure 1 – Site Location plan

Figure 2 – Location of identified bat roosts

Figure 3 – Plan of buildings to be covered by licence

Figure 4 – Works pre-licence approval and buffer zones

Figure 5 – Phasing of Demolition works

Figure 6 – Further surveys proposed within redline boundary

Figure 7 – B16 bat mitigation design

Figure 8 – Location of bat boxes

Appendix 1A-B: Cool Tower - VWT design

Appendix 1A: Cool Tower (Colin Morris, Vincent Wildlife Trust, 2017).

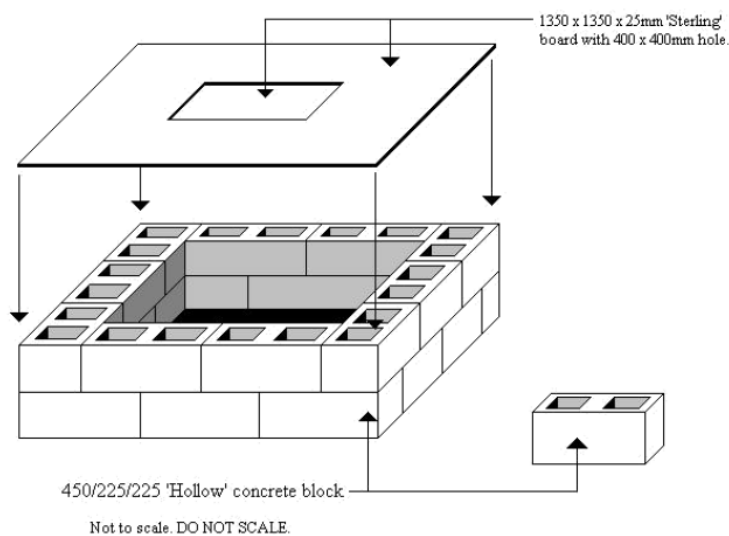


Fig 1. BASE.

The floor/ground need to be flat and level. Sterling board has been suggested as it has a 'rough' surface, enabling lesser horseshoe bats to grip. In the 'original' tower I fitted nylon netting to the underside of the boarding.

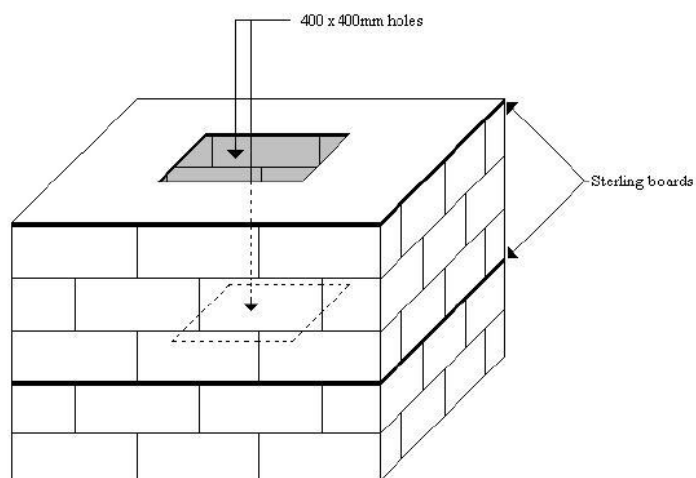


Fig 2. CENTRAL SECTION. 400x 400mm holes cut centrally through boarding

Appendix 1B: Cool Tower (Colin Morris, Vincent Wildlife Trust, 2017).

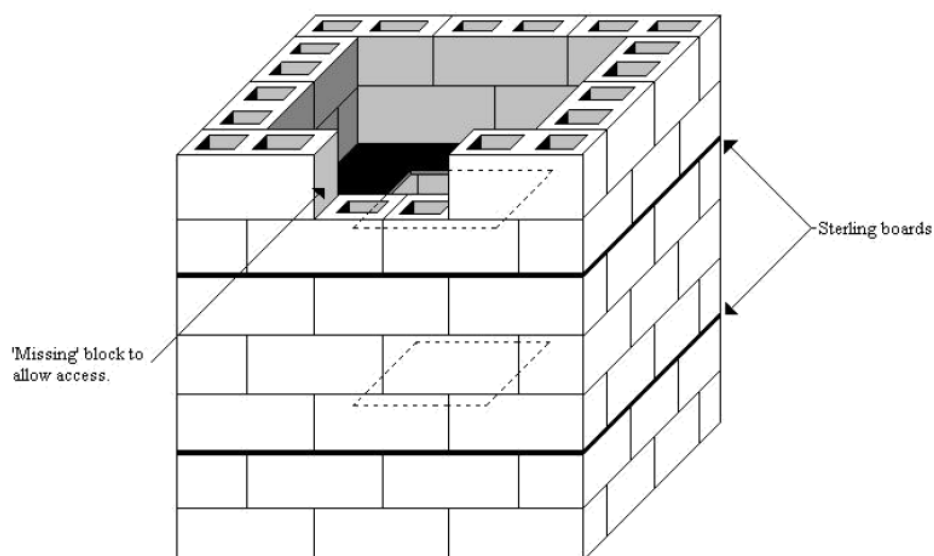


Fig 3. UPPER SECTION. Showing 'missing' block to allow bats access

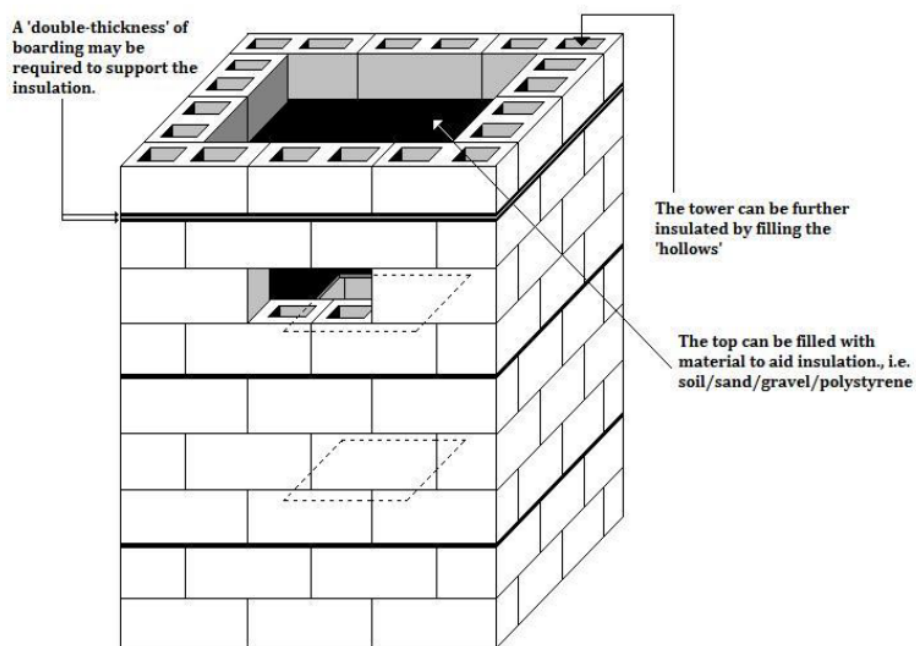


Fig 4. FULL TOWER. Insulation can be increased by filling the hollow sections and covering the roof with suitable material ie soil/sand/gravel/polystyrene