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Sent: 06 November 2025 15:31
To: Roberts, Geraint (Principal Planning Officer) <GeraintN.Roberts@newport.gov.uk>
Cc: Rob Peters <rob.peters@turley.co.uk>; Owen Francis <owen.francis@turley.co.uk>; Abi Roberts <abi.roberts@turley.co.uk>; Harris, Matthew (Ecology Officer) <Matthew.Harris@newport.gov.uk>; Davidson, Joanne (East Area Development Manager) <Joanne.Davidson@newport.gov.uk>; Tim Clark <tim.clark@rskbiocensus.com>
Subject: 25/0826 - Llanwern Steelworks - Demolition

Geraint,

Further to your email (23 October) and our subsequent telephone discussions, we understand that you still have three main queries regarding the ecology work for bats at Llanwern Hot Mill. We reiterate that for this type of application you should not seek for planning to duplicate the role of NRW, which requires separate licensing to address bats, as a European Protected Species (EPS).

Along with the Ecologist, Tim Clark, RSK, we answer each of your three queries below. In addition, we have attached the RSK Method Statement, which has been submitted to NRW as part of the licence application. In that, we answer queries relating to the points you have raised, which NRW will consider as part of its assessment for the licence.

The information below and attached should give you the confidence that the strategy proposed to address bats presence will not undermine the favourable conservation status of the bat species present, and note that these works are licensable. The licence is currently with NRW for review, and should they have any comments RSK will proactively adapt the proposed strategy, if necessary, as part of the licence application process. Demolition works cannot proceed in the licensable areas until the licence is in place and Newport City Council's granting of the prior approval does not discharge Tata's duty to comply with the legislation.

1. Confidence in the ecology survey effort and the proposed further surveys / phased approach

RSK has a high degree of confidence in the bat work it has completed, the surveys and the results. Surveys have taken place over 17 months (Mar 2024- Sept 25). Surveys included each building within the demolition redline boundary (and also some beyond) being subject to a preliminary roost assessment at least twice over this period, with the majority at least three times (the former Hot Mill was subject to 12 inspections over this time).

RSK also undertook seven nights of dusk emergence / dawn re-entry surveys covering seven buildings, and static bat detector surveys for a total of 194 nights from December 2024 to September 2025, covering 23 locations across the site. We have acknowledged that the scale of the site / former Hot Mill building and specific Health & Safety considerations meant that an adapted approach to surveys has been required.

The Hot Mill building alone has a footprint of 11.6ha and it is nearly a kilometre from one side of the CDM boundary to the other. Overall, low bat activity was recorded across the site, and there is no indication that additional species / roosts have been missed. Whilst large, the majority of the buildings on site do not offer suitable conditions for a roost of high conservation status (e.g. large numbers), due to their condition and construction materials.

All roosts identified were assessed to be of site value (common pipistrelle / brown long-eared) or at most local value (lesser horseshoe). These species are common throughout the

locality and South Wales, and the level of activity identified across significant survey effort does not suggest that additional roosts are present on the Site. Certainly nothing of high conservation value / large numbers which would amend the mitigation strategy. In particular, the evidence collected on lesser horseshoe (rarest of the three species), suggests a small number of bats opportunistically using the open nature of the buildings, primarily for night roosts. Whilst we have evidence of day roosts from static recorders, these are occasional and does not suggest the Site represents a core area for the local population. The same is true for common pipistrelle and brown long-eared.

RSK is therefore confident it has sufficient data to inform the impact assessment completed, and to design the required level of mitigation to ensure favourable conservation status of these species is not negatively impacted.

RSK has recommended further surveys on some buildings due to the timeline of demolition works and the scale of the Site. Full demolition of the site will take at least three years. Certain buildings, to the north and south of the Hot Mill, will not be subject to any works (including disturbance) until at least end of 2026, but likely 2027 or 2028. Given these buildings are all at least 30m from any demolition works that will take place before summer 2026, RSK determined that the best course of action is to survey these in 2026, closer to the time of any demolition works that will affect them.

Based on the types of features recorded on the buildings, any findings are likely to be limited to small day roosts of pipistrelle or brown long-eared. Such findings can be accommodated in the existing mitigation proposals and would simply require an amendment to the currently proposed licence. This is not an unusual scenario, as many phased developments are treated in this way, with sequential surveys as new phases of works come online, and relevant licences are amended. RSK's proposed mitigation planning (described below) allows for additional findings, based on its thorough understanding of the use of the overall Site.

As part of the proposed licence commitments there will be regular checks by a licensed bat ecologist across the site once demolition begins, and prior to demolition of areas suitable for bats.

2. Suitability of the proposed bat mitigation

The primary mitigation involves using an existing building (B16) within Tata's ownership that is outside of the CDM boundary, and approximately 200m distant from the proposed demolition area. The building is already used occasionally by lesser horseshoe and common pipistrelle bats in small numbers, but it is sub-optimal and has good potential for growth/additional use (e.g. maternity roost) if building conditions were improved for bats. The windows on all elevations to Building B16 make the interior very light during the day, unsuitable for bats.

The mitigation proposals are to block light entry from the windows through internal treatment (paint black or cover); to install internal "cool towers" within the building (refer to the Method Statement attached); and provide bat boxes suitable for pipistrelles and brown long-eared bats on the exterior.

Whilst bats have been recorded in several buildings on site, overall numbers are low throughout the Site, and improving Building B16 as proposed will provide a roost with a footprint of approximately 895m², and optimal conditions for the roost size (and therefore conservation status) to increase. Additional bat boxes are proposed to be installed on the tree line, in total nine bat boxes are proposed, which are more than sufficient to compensate

for loss of roosts for the common pipistrelle and brown long-eared within the building complex to be demolished.

RSK is confident in its survey results and overall assessment of bat use on the Site (low). It is not anticipated that additional species or roosts of significance would be found during the pre-works check or further surveys. Should the buildings to be subject to further surveys in 2026 be found to contain bat roosts, it is anticipated that this would be no more than day roosts used by small numbers of pipistrelle or brown long-eared bats, due to the type of features identified on the buildings. If they were identified, then there is sufficient scope and capacity to accommodate additional bats / roosts within Building B16 and proposed bat boxes.

Whilst it is considered unlikely, should an unexpected species be identified roosting, or a roost more significant in size / conservation status than a day roost be found, then the mitigation proposal can be increased (additional bat boxes / additional features within Building B16) without affecting the deliverability of the mitigation.

The licence application includes a mechanism for ensuring delivery of bat mitigation and compensation, and a mitigation contingency. Should an unexpected species / roost be identified at any point, works which could affect it would be paused / rescheduled to allow discussion with NRW and where necessary amendment of the licence and provision of additional mitigation. Due to the scale of the site, there is scope to do this without halting all works, and this is no different to any project where contingencies must be in place for unexpected finds.

3. Planning requirements for the proposed bat mitigation

The bat mitigation proposals for Building B16 are summarised above. These are all internal works to a currently vacant building with no changes to its external appearance. There is no requirement for planning involvement in these internal works.

Given the above, we would be grateful to receive the prior approval for demolition from Newport Council as a matter of urgency.

Regards

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