

# Vegetation Clearance & Reptile Mitigation and Replacement Green Roof Compensation

for

Mardon Park, Baglan



## Project data

|                          |                                              |
|--------------------------|----------------------------------------------|
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# Contents

|          |                                          |          |
|----------|------------------------------------------|----------|
| <b>1</b> | <b>INTRODUCTION</b>                      | <b>1</b> |
| 1.1      | PURPOSE OF THIS REPORT                   | 1        |
| <b>2</b> | <b>GREEN ROOF PROVISION</b>              | <b>3</b> |
| 2.1      | THE GREEN ROOF CONDITION                 | 3        |
| 2.2      | PROPOSED NEW MITIGATION AREAS: BASELINE  | 3        |
| 2.3      | PROPOSED NEW MITIGATION AREAS: APPROACH  | 6        |
| <b>3</b> | <b>REPTILE METHOD STATEMENT</b>          | <b>7</b> |
| 3.1      | THE SITE CLEARANCE AND REPTILE CONDITION | 7        |
| 3.2      | REPTILE METHOD STATEMENT                 | 7        |
| <b>4</b> | <b>REFERENCES</b>                        | <b>9</b> |

# 1 Introduction

## 1.1 Purpose of this report

- 1.1.1 This report has been prepared on behalf of Jon Ridd at GBV Properties Ltd in relation to three planning consents at Mardon Park, Baglan. A number of planning conditions relating to ecology are attached to each of these consents, those relevant to this report are set out in Table 1 below.

Table 1. Summary of planning consents and relevant ecological conditions.

| Consent number | Site name                                    | Condition | Summary of condition requirements           |
|----------------|----------------------------------------------|-----------|---------------------------------------------|
| P2021/0956     | Land at Mardon Park*                         | 9         | Green roof provision                        |
|                |                                              | 11        | Vegetation clearance and reptile protection |
| P2021/1086     | Mardon Park, Unit 21 (extension of existing) | 7         | Green roof provision                        |
|                |                                              | 8         | Vegetation clearance and reptile protection |
| P2021/1087     | Land adjacent to Unit 19/20 **               | 7         | Green roof provision                        |
|                |                                              | 8         | Vegetation clearance and reptile protection |

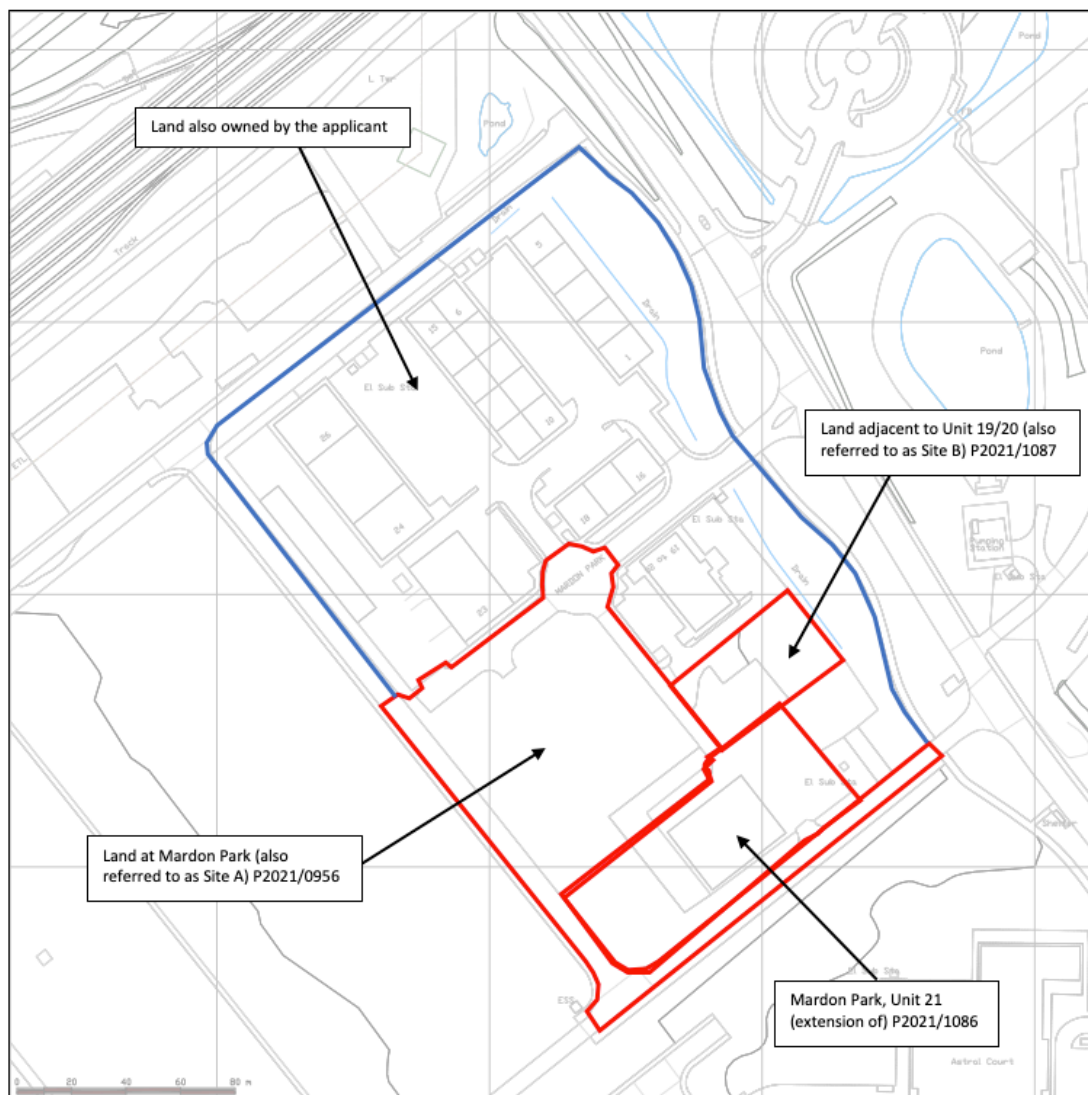
Notes:

\* Also referred to as 'Site A'

\*\* Also referred to as 'Site B'

- 1.1.2 Figure 1 below shows the approximate planning application boundaries for each of the three sites within the wider land ownership boundary (blue line).

Figure 1. Planning application boundaries at Mardon Park (approx.)



- 1.1.3 Since all three sites are located adjacent to each other and most of the above conditions for each are identical or very similar, all three sites are addressed collectively within this report. This approach was agreed during a meeting with Neath Port Talbot Council on 16<sup>th</sup> May 2023.
- 1.1.4 This report therefore sets out how each of the above ecology-related planning conditions will be addressed and refers to a number of separate plans which support these measures. In addition, a number of existing reports that formed part of the original planning applications are also referred to. The report also sets out details of alternative provision of net benefit for biodiversity, instead of complying with the conditions relating to the requirement for green roofs.

## 2 Green Roof Provision

### 2.1 The green roof condition

2.1.1 The green roof condition for each of the three consents is identical and reads as follows:

*Notwithstanding the submitted plans, no development shall take place (including vegetation clearance) until, full details of the proposed green roof, including roof design, details of the substrate, species mix/density, an implementation programme (including phasing of work where relevant) shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the agreed details and implementation program and retained as such thereafter.*

2.1.2 It is understood that due to the construction and materials proposed for building out the three consents, together with significant cost implications that would be required to change this, the applicant wishes to replace this requirement with alternative provision of mitigation habitat.

### 2.2 Proposed new mitigation areas: baseline

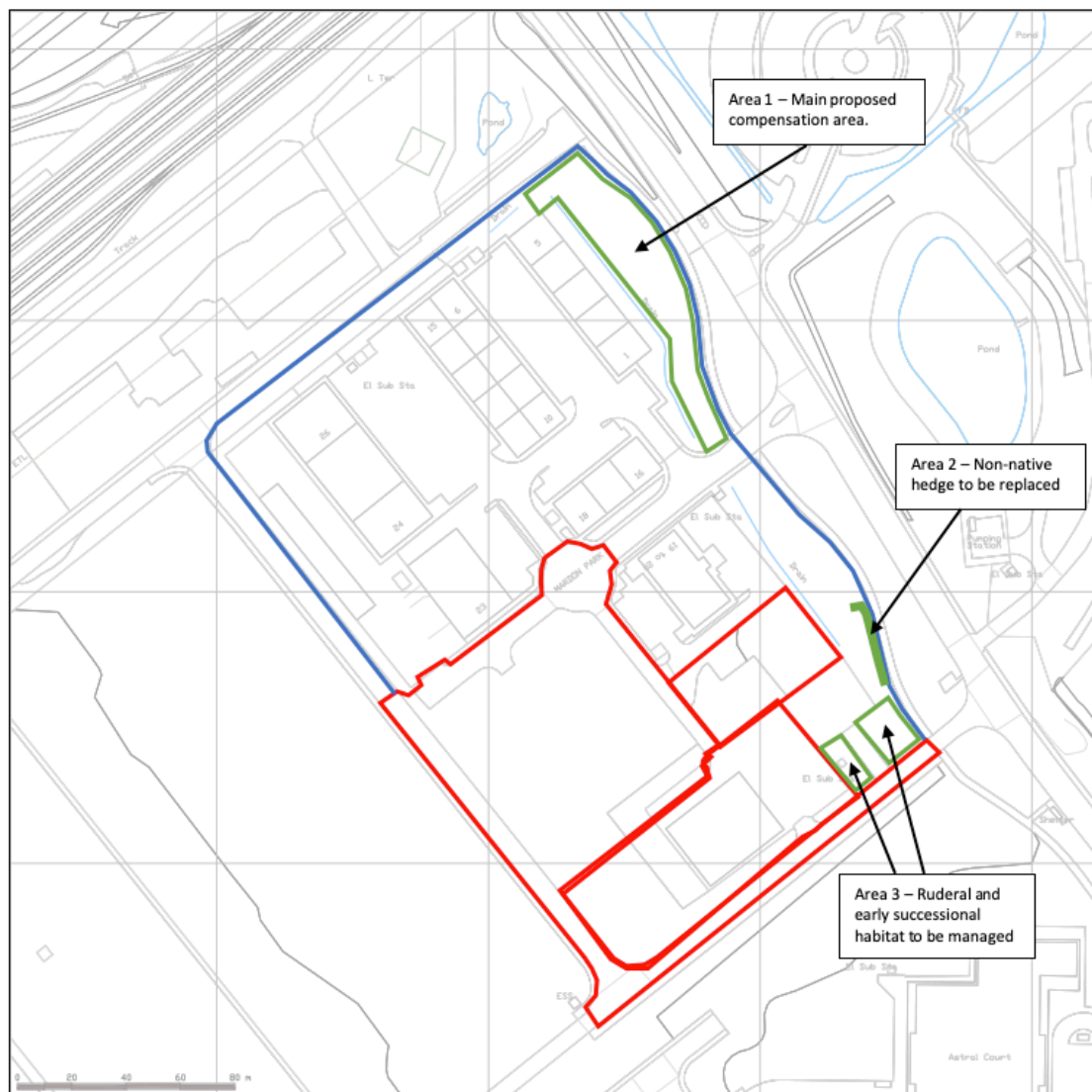
2.2.1 A site meeting between Diana Clark (Lead Ecologist at Koru Ecology Associates), Laura Palmer (NPT Planning Ecologist) and Rob Bowen (Planning Consultant) took place on 26<sup>th</sup> May 2023 and a discussion was had around possible alternative provisions for biodiversity on land outside the planning application boundaries, but within the applicant's landholding.

2.2.2 A more detailed walkover survey of the areas chosen, including habitat and plant species identification, was completed by Diana Clark on 25th July 2023. Diana has worked as a consultant ecologist since 2003 and holds two degrees in related disciplines. She is also a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM), and Koru Ecology Associates is a CIEEM Registered Practice.

2.2.3 An area of land to the north west of the three planning application sites was chosen as the primary area for replacing the green roof provision (Area 1 in Figure 2 below, see also Figure 3). This area largely comprises semi-improved neutral grassland that is regularly managed as amenity grassland, and in the absence of alternative proposals this will continue in perpetuity. Whilst this area is reasonably botanically diverse, due

to the current management practices it's ability to support a diverse range of invertebrate species and other notable species such as reptiles is poor. This is due to the lack of structural diversity and the inability of plants to flower in profusion, thus providing food sources for pollinators and other insects.

Figure 2. Proposed compensation areas.



- 2.2.4 Other vegetation in this area includes several patches of scrub (largely non-native), several young trees (mostly silver birch *Betula pendula* and one ash *Fraxinus excelsior*), together with a few native scrub species (including hawthorn *Crataegus monogyna*, rose *Rosa* sp. and bramble *Rubus fruticosus* agg.).
- 2.2.5 A second area (Area 2 in Figure 2 above, and see Figures 4 & 5 below) was chosen as an additional location to provide compensation habitat. Currently this area is a non-native hedge, largely comprising *Cotoneaster* sp.

|                                                                                                                                                                                     |                                                                                                                                                                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Figure 3. Area 1: amenity grassland and band of non-native scrub on the right.</p>              | <p>Figure 4. Area 2 (north): non-native hedge to be removed and replaced by native species.</p>  |
| <p>Figure 5. Area 2 (south): non-native hedge to be removed and replaced by native species.</p>  | <p>Figure 6. Area 3: ruderal/early successional habitat to be managed.</p>                     |

## 2.2.6

The third and final area (Area 3 in Figure 2 above, see also Figure 6 above) currently comprises largely ruderal species interspersed with some grasses and sapling/seeding scrub species, i.e. early successional habitat. Species include wild carrot *Daucus carota* ssp. *carota*, oil-seed rape *Brassica napus* ssp. *oleifera*, dandelion *Taraxacum officinale* agg., common ragwort *Jacobaea vulgaris*, creeping thistle *Cirsium arvense*, common knapweed *Centaurea nigra*, spear thistle *Cirsium vulgare*, bramble *Rubus fruticosus* agg., ribbed melilot *Melilotus officinalis*, evening primrose *Oenothera* sp., ribwort plantain *Plantago lanceolata* and St John's-wort *Hypericum* sp., alongside sparsely distributed grasses

including Yorkshire-fog *Holcus lanatus*, cock's-foot *Dactylus glomerata*, fescue *Festuca* sp., perennial rye-grass *Lolium perenne* and annual meadow grass *Poa annua*.

## 2.3 Proposed new mitigation areas: approach

- 2.3.1 The roof area of the three sites combined, presumed to be the maximum area required by the condition, has been calculated to be 3029 sqm.
- 2.3.2 The three areas of alternative provision (including the mitigation area for notable plant species, replacement native hedge and the area of ruderal early successional habitat proposed for management) is approximately 3271 sqm, and therefore is slightly larger.
- 2.3.3 In Area 1, it is proposed that areas of non-native scrub will be removed and new native hedge will be planted along the eastern and northern boundaries. In addition, a strategy for creating new habitat for notable plant species found on the consented sites has been developed. This will include both substrate and plant translocation. Further details of both the new native hedge, tree planting and new habitat for notable plant species in Area 1 are given in plan A1 – A505 which accompanies this report.
- 2.3.4 In addition, a Translocation Method Statement has been produced by Barry Stewart (B Stewart, 2023) detailing the methods by which the plant translocation will be completed. This should be read in conjunction with this report.
- 2.3.5 In Area 2 it is proposed that the existing non-native hedge be removed and replaced by a new native hedge, in accordance with details give in plan A1 – A505 which accompanies this report.
- 2.3.6 In Area 3, it is proposed that the existing habitat be retained and be subject to longer term management, in order to maintain good species diversity. This will be achieved via a late summer/early autumn cut following an inspection by an appropriately competent ecologist every two years, as appropriate and in response to the condition of the habitat at the time. This area is also shown in plan A1 – A505 which accompanies this report.
- 2.3.7 It is considered that the above outlined approach is appropriate both in terms of a suitable receptor site for notable plant species, and for long-term ongoing provision of diverse habitats, which otherwise will be lost as a result of unchecked succession on the donor site. In addition, the replacement of non-native hedges with native species will also provide some net benefit of biodiversity.

## 3 Reptile Method Statement

### 3.1 The site clearance and reptile condition

- 3.1.1 The site clearance and reptile condition for each of the three consents is identical and reads as follows:

*Prior to the commencement of any works on site, including vegetation clearance a working method statement for protecting reptiles shall be submitted to and approved in writing by the Local Planning Authority. The strategy will be implemented as agreed.*

- 3.1.2 The Preliminary Ecological Appraisal report for P2021/0956 (G Jones, 2021a) noted that this site has 'low potential to support reptiles' due to the disturbed nature of the site. The report also noted that 'common lizard and slow-worm have been recorded in the locality and it is considered that they could still occur on the site albeit at low population densities'.

- 3.1.3 The Phase 2 survey report for P2021/0956 (G Jones, 2021b) extended into land covered by P2021/1086 and P2121/1087 and noted 'the site reptile survey showed no presence of reptiles across the site. It is also understood that the site is subject to high water tables and flash flooding during heavy rain events, this is considered likely to severely restrict reptile use of the site'. Whilst no reptiles were found during the reptile surveys, the report recommended 'a destructive search for amphibians and reptiles must be undertaken during topsoil stripping with any animals encountered removed safely to retained habitats under the same landownership'.

### 3.2 Reptile method statement

- 3.2.1 Since no reptiles were found during the survey work, their presence on the site is considered to be unlikely, However as a precaution, the following approach will be taken:

1. Immediately prior to site strip commencing, any rocks, branches and other debris (including man-made items) that may provide refugia habitat for reptiles will be lifted and checked by an appropriately competent ecologist.

2. Supervision of the remaining site strip by an appropriately competent ecologist will then be required. The ecologist will carefully inspect areas as they are cleared by machinery, and alert the driver if any reptiles are discovered.
3. All scrub/hedge removal will take place outside of the bird nesting season, generally considered to be March to August inclusive. If that is not possible, immediately prior to removal, the vegetation will be inspected by an appropriately competent ecologist. Should the presence of nesting birds be identified, no works within an appropriate exclusion zone will take place until the young have fledged the nest, or the nest becomes unviable.
4. In the unlikely event that reptiles are found by the ecologist, these will be carefully caught, handled and removed immediately to nearby retained suitable habitat within the applicant's landholding. Suggested locations for any translocated individuals are shown in Figure 3 below. These are located on the south west and south eastern edges of the landholding, close to additional suitable habitat further afield and outside the applicant's landholding, within which they could potentially disperse.
5. In accordance with best practice, records of any observed reptiles will be submitted to the local biological records centre.

## 4 References

Joint Nature Conservation Committee (2010) Handbook for Phase I Habitat Survey: A Technique for Environmental Audit. JNCC, Peterborough.

Jones, G. (2021a) Land at Mardon Park, Baglan Energy Park: Preliminary Ecological Appraisal. Greg Jones, Swansea.

Jones, G. (2021b) Land at Mardon Park, Land at Mardon Park, Baglan Energy Park: Phase 2 Ecology Surveys (Ecosystem Resilience Assessment, Mitigation, Compensation and Enhancement Measures). Greg Jones, Swansea.

Stace, C. (2019) New Flora of the British Isles (4<sup>th</sup> edition). Cambridge University Press, Cambridge.

Stewart, B. (2023) Translocation Method Statement: Rare and Protected Plants [at] Mardon Park, Baglan, Port Talbot. Barry Stewart, Swansea.