

ECOLOGY OBJECTION

The members of the Bryncoch Action Committee (BAC) object to the modifications to the UDP, as the issues set out below do not appear to have been considered appropriately by the inspector and were not raised properly at earlier stages of the UDP process.

An ecological assessment was carried out by Neath Port Talbot Council in 2006 on the site at Bryncoch Farm. The assessment identifies fields 1,2 and 7 as being improved grassland and as such being of no constraint to potential development for housing.

An independent ecological survey commissioned by the Bryncoch Action Committee (BAC) in early June 2007 concludes that the same fields are Poor Unimproved Neutral Grassland and also representative of NVC community MG5 Crested Dog's Tail – Black Knapweed Grassland. They are also an example of Lowland Meadow (a UK BAP Priority Habitat) and Lowland Hay Meadow and Old Pasture (a Neath Port Talbot BAP Priority Habitat).

A copy of the Bryncoch Farm Ecological Survey is attached. This survey contains a copy of the assessment carried out by Neath Port Talbot Council in 2006, as appendix 2.

The assessment carried out by Neath Port Talbot in 2006 identifies several key habitats on the Bryncoch Farm Site as being of High Level Constraint and as such these areas should be protected from development. The survey appears to be consistent with the phase 1 survey carried out by the Countryside Council for Wales (CCW) in 1991.

A copy of CCW Phase 1 Habitat Survey Map 1991 is included in the Bryncoch Farm Ecological Survey as appendix 3

The following habitats were identified by Neath Port Talbot Council in 2006.

1. Improved Grassland (Areas 1, 2 and 7)
2. Rivers and Streams
3. Ancient and/or species rich Native Hedgerows/Hedge Banks
4. Woodland and Mature Trees
5. Willow Carr (Area 3)
6. Purple Moor Grass and Rush Pasture (Fields 4,5 and 6)
7. Pond
8. Bramble/Gorse Scrub

All of the above habitats on the Bryncoch Farm site with the exception of the Improved Grassland are identified by Neath Port Talbot as being of High Level Constraint and as such should be protected from development by various means (mainly fencing). The BAC is in full agreement with Neath Port Talbot Council on habitats numbered 2 to 8 above, this although feel that protecting them by fencing them may be unsuitable, however more on this later.

What the BAC disagrees with, is the assessment of Areas 1, 2 and 7 as Improved Grassland as described by Neath Port Talbot in their Ecological Assessment of the site in 2006.

On the 2nd June 2007, an ecological survey of Bryncoch Farm was carried out on behalf of the BAC by Julia Tilson, a qualified habitat surveyor, the survey concludes on page 2, section 3.1

‘the fields are floristically diverse with over 50 different plant species recorded, a good number of these indicators of unimproved grassland’.

Your attention is also drawn to the attached extract from South Wales Wildlife Sites Partnership (2004) – **Guidelines for the Selection of Wildlife Sites in South Wales.**

A copy of the relevant section of the guidelines are attached.

The reader is requested to read the paragraph on page 24 of the guidelines highlighted * which begins ‘ In practice’

‘ In practice it is suggested that ‘relatively species rich’ is represented by sites with at least 8 indicator species present from Table 2 – Unimproved neutral grassland indicator species.

Table 2 is listed on page 28 to 29 of the attached guidelines.

There are 9 indicator species found on the meadows at Bryncoch Farm. These are indicated with a tick and highlighted in Table 2.

Also on page 24 of the guidelines highlighted ** the characteristic species associated with NVC community MG 5 grassland are listed.

The Plant Species List – Appendix 4 of the Bryncoch Farm Ecological Survey, lists the plants identified on the meadows and recorded on using the DAFOR scale of abundance. The Plant Species List appears to support the classification of the meadows at Bryncoch Farm as NVC community MG5 grassland.

A copy of the Bryncoch Farm Ecological Survey has been sent to the Countryside Council for Wales for comment.

In her Ecological Evaluation of the Site, on page 6 , section 5.1 of the Bryncoch Farm Ecological Survey, the author goes on to say

‘The fields are judged to be Unimproved Neutral Grassland (in poor condition) a nationally threatened habitat, having undergone massive decline over the last century. They are further thought to be representative of NVC community MG5 crested dog’s tail – black knapweed grassland and as such serve as a good example of Lowland Hay Meadow and Old Pasture a local Priority habitat and one reported to be very rare in West Glamorgan. Currently there is estimated to

be less than 25ha in total, occurring as tiny isolated fragments. So the Bryncoch Meadows at 6.6ha would appear to be a significant resource.

In her summary on page 6, section 5.3 the author states:

‘The meadows are of great conservation importance in their own right, given that there are only a small number of other such species rich neutral grasslands in the region. Loss of this rare habitat would be especially detrimental to the community of invertebrates dependant on them for survival and would also diminish the nature conservation value of the wider site by reducing habitat diversity’.

Management and Protection of Habitats

The reader should refer to Ecological Assessment carried out by Neath Port Talbot Council 2006 and included in the Bryncoch Farm Ecological Survey as appendix 2.

The section beginning and highlighted : Fields 4,5 and 6 are dominated by rush species ‘ Most are currently or have been grazed by cattle. The frequency of rushes and other plants associated with damp conditions means that these areas are classed as Purple Moor Grass and Rush Pasture and as a priority habitat should be retained and protected from the effects of nearby development (e.g. adjustments to water level). Field 6 is particularly rich habitat, vegetation dominated by Purple Moor Grass, with flowering plants including Ling, Tormentil and Devils Bit Scabious, the wettest areas supporting Sphagnum (bog moss) (red)’.

The BAC maintain that the key to retaining this habitat in it’s current condition is the continued grazing of the site by cattle. This will be extremely difficult if the better grazing meadows (Areas 1, 2 and 7) were developed for housing, thus leaving this habitat area essentially landlocked and unable to be grazed. Storm water run off from any potential development may also cause changes to water levels.

The council’s ecological assessment 2006 also states the Ancient and / or Species Rich Native Hedgerows/ Hedge banks be also ‘protected from development by way of suitable fencing, the relevant section has also been highlighted.’

BAC maintains that these habitats may suffer a decline in condition if the meadows were developed for housing. Trees may be excessively trimmed by residents if they felt they were encroaching on their gardens and reducing light levels. In some cases experience has shown that fenced in corridors effectively become little more than dumping grounds for garden and building waste from adjacent properties. In both cases the conservation value of the habitat is reduced.

Finally the proposed housing allocation on Bryncoch Farm represents just over 3% of the UDP housing allocation of 6000 homes. **The BAC maintains that the homes could easily provided elsewhere in the county borough over the life of the UDP. If the site is developed for housing there is no turning back and an extremely**

valuable habitat which is very rare both locally and nationally will have been destroyed for ever

The Bryncoch Farm Ecological Survey

BRYNCOCH FARM ECOLOGICAL SURVEY



Undertaken by Julia Tilson
On behalf of The Bryncoch Action Committee

June 2007

Guidelines for the Selection of Wildlife Sites in South Wales