

OBJECTION TO NEATH PORT TALBOT BIODIVERSITY

BRYNCOCH FARM

We object to the Modification of the UDP to allow the allocation of Bryncoch Farm for housing as the inclusion of this site would be in direct contravention with the stated aims /objectives and designated actions of the Local Neath Port Talbot and National UK Biodiversity Plans.

‘Biodiversity is all living things, from the tiny garden ant to the giant redwood tree. You will find biodiversity everywhere, in window boxes and wild woods, roadsides and rain forests, snowfields and seas shores. (Biodiversity: The UK Steering Group Report 1995).

The Neath Port Talbot County Borough Council website has as the heading title on the Environment page the following statement ‘Welcome to the environment. The changing face of Neath Port Talbot is testimony to the council’s commitment to making the county borough a greener place to live. **Caring for the environment and protecting it for future generations is top of the agenda when decisions are made.**’

Unfortunately for our community in Bryncoch this has not been the case with the decision by NPTCBC to accept the inspector’s recommendation and amend the UDP to allow the development of a large housing estate on Bryncoch Farm with the inevitable destruction of previously protected Green Wedge land and the rich biodiversity contained within it.

Within NPTCBC the Biodiversity function unit was set up to address the pressures on biodiversity within the County Borough. The key document on which the unit basis its work is the Local Biodiversity Action Plan (2001-2006) which was produced by the Neath Port Talbot Biodiversity Forum and put together on its behalf by the council’s Environmental Quality Unit. A major aim of the plan is to **‘protect and create habitats and species via the local planning process, both in terms of the UDP and when individual planning applications are considered.’**

‘Local Biodiversity Action Plans (BAP) are important in allowing communities and interest groups to identify which species they believe to be important, recognising the importance of local distinctiveness.’ (Page 2 Local BAP)

Functions of Local BAP’s include:

- *To identify targets for species and habitats appropriate to the local area, and reflecting the values of people locally.*
- *To ensure that opportunities for conservation and enhancement of the whole biodiversity resource are fully considered.*
- *To develop effective local partnerships to ensure that programs for biodiversity conservation are maintained in the long term.*
- *To ensure that opportunities for conservation and enhancement of the whole biodiversity resource are fully considered.*
- *To ensure that national targets for species and habitats as specified in UK Action plans are translated into effective action at the local level.*

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The Neath Port Talbot Biodiversity Action Plan is a detailed and lengthy document and what is readily apparent from it is that Bryncoch Farm contains many of the Habitats and species which the plan sets out to **identify, conserve and enhance**. Bryncoch Farm is indeed richly biodiverse given its mature hedgerows, old unimproved meadows, wetter marsh land areas and riverside habitats. It is one of the very few remaining unspoilt sites of its kind in the whole of the local area and beyond.

NEATH PORT TALBOT BIODIVERSITY ACTION PLAN

HABITATS

The independent **in depth** Ecological survey carried out on the site at the request of the Bryncoch Action Committee has highlighted in no uncertain terms features of the site of great significance in terms of its Biodiversity at a local and National level not identified by the ecological survey carried out by NPTCBC.

Particular reference is given below to the field habitats upon which the building of houses is proposed with comments taken from the Local Biodiversity Action Plan for Neath Port Talbot.

Extract from Bryncoch Action Committee survey:

'The hedges are mostly dense, tall and overhanging, providing an excellent habitat for wildlife...they are typically comprised of an intricate mix of native woody species....therefore regarded as species rich'. Ancient/Species rich Hedgerows are a National and Local Priority Habitat.



*'The fields are judged to be Unimproved Neutral Grassland, a nationally threatened habitat (UK BAP Priority Habitat) and representative of NVC community **MG5** black knapweed-crested dog's tail grassland and as such serve as a good example of **Lowland Hay Meadow** and **Old Pasture** (Local Priority Habitat).'*

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Local Biodiversity Action Plan –*Habitat Action Plan Section*

A. *Lowland Hay Meadow page a.15*

1. Current status

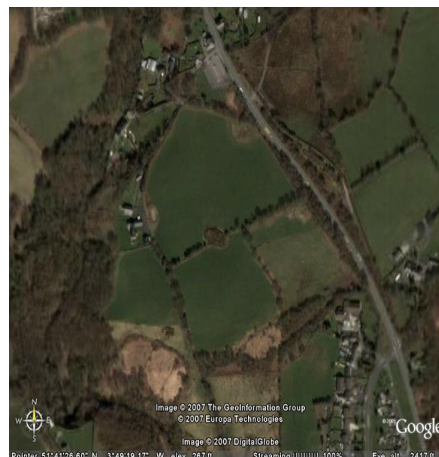
- Species rich neutral grasslands are now very rare....those grasslands which have survived are a relic of pre war agriculture. Between 1930 and 1997 it is estimated that a 97% loss occurred in semi natural lowland grassland in England and Wales. Less than 2000 hectares is thought to remain in Wales. *In West Glamorgan there is estimated to be less than 25 hectares in total occurring as tiny isolated fragments, therefore the 6.6 Ha in Bryncoch farm is particularly important and a significant resource.*
- **MG5** grassland is now a very rare grassland community which in global terms is restricted to the British Isles where there are estimated to be only 4000 Ha present.

Lowland Hay Meadow cont.

2. Action (page a.17)

- Develop a managed network of Hay meadows and Old Pastures across Glamorgan (action NPTCBC)
- Protect and conserve by statutory protection, planning practice and habitat management a viable biodiversity resource of the various forms of Lowland Hay Meadows and Old Pastures within Glamorgan (action NPTCBC).
- Identify Lowland Hay Meadows as important in terms of Biodiversity through the town and Country Planning system(action NPTCBC)

The aerial photograph below shows the field boundaries at the Bryncoch Farm site which have not changed significantly in over 150 years.



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B. Ponds

The site at Bryncoch Farm also contains a wildlife pond which is visible from aerial photographs of the site and which would be lost under the new proposed housing development. Ponds are also included within the Local BAP for Neath Port Talbot:

1. Habitat Definition and Current Status (page a 19)

- Lakes and ponds are **rare** habitats in Neath Port Talbot area, but are of considerable importance for nesting and wintering wildfowl, fresh water invertebrates, aquatic, emergent and bank side plant communities.

2. Current Action (page a 20)

- Ponds and lakes are to be considered as important for biodiversity in the planning process.
- Key flora and fauna which occur in ponds are to be considered as important in the planning process.
- Identify ponds as important in terms of biodiversity through the Town and Country Planning system.



Meadow pasture with pond in distance at Bryncoch Farm

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WILDLIFE SPECIES

The site at Bryncoch Farm contains a number of Specially Protected species namely Badgers, Bats and Barn Owls, foraging mammals such as rabbits, stoats and weasels and all manner of breeding birds. A number of these species are identified in the local Biodiversity Action Plan as both Local and National priority species. Some examples are highlighted below:

Badgers

There is a large badger sett either side of the A474 running along the eastern side of the site. The badger is a Neath Port Talbot BAP Priority species and Specially Protected Species. The local BAP makes the following comments: *‘Current factors for loss or decline include loss of feeding habitat in particular grasslands, to residential and industrial development. Continue with and improve on current strategies for redress of loss of feeding habitats and pursue planning refusals or satisfactory mitigation where proposed development threatens to erode feeding habitat.’ (Page m11)* **Indeed the importance of the badger population at Bryncoch Farm is clearly evident and of concern to the Council as they have erected roadside reflectors at the badger crossing points alongside the A474 at the site.**

Birds

The insect rich meadows and mature overhanging hedgerows provide an ideal nesting and feeding habitat for birds, numerous species of which inhabit Bryncoch Farm. The Song Thrush and Bullfinch are UK AND Neath Port Talbot BAP Priority Species. During the course of the independent ecological survey Blackbird, Goldfinch, Great Tit, House martin, Jay and Swallow were noted-all of which are UK BAP Species of Conservation Concern.

Local people who are keen ornithologists have reported the site to be occupied by three species of woodpecker (Green, Great Spotted and Lesser Spotted) and during the summer month's migrants such as Willow Warblers, Chiff Chaff and Whitethroats which are reliant on the sites mix of woodland and gorse for protection and breeding. The site is an important feeding habitat for migratory birds such as Redwings and Fieldfares.

Birds thrive on the site because the land has never been intensively managed from an agricultural point of view and is teeming with insect life and nesting sites. Barn owls and Red Kites hunt on the fields at Bryncoch Farm, both these are Neath Port Talbot BAP Priority Species as well as Specially Protected Species and they need the open expanses of land such as those on Bryncoch Farm if they are to survive in the future.

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Bats

The insect-rich Meadows and hedgerows provide excellent feeding grounds for bats which can be seen in the evenings feeding throughout the site and along adjacent lanes. The large number of mature native trees on the site provides ideal roosting areas for bats. Native Bats are a Neath Port Talbot BAP Priority Species and Specially Protected Species. The ecologist appointed by Bryncoch Action Committee has advised a specialist survey be carried out on the Bat population of the site.

Invertebrates

One only has to walk across the site at this time of year to be impressed by the level of insect life supported by the local habitat: moths, butterflies, damselflies and dragonflies are all present in abundance. The ecologist appointed by Bryncoch Action Committee has highlighted the need for a specialist survey to be carried out to identify all the species of interest which may include the Marsh Fritillary Butterfly which is a UK/Neath Port Talbot BAP Priority Species.

SUMMARY

The Local Biodiversity Action Plan for Neath Port Talbot as written by the Neath Port Talbot Council's own Environmental Quality Unit has a Vision Statement which is in effect what we are hoping to achieve with the long term aim of developing the site at Bryncoch Farm as a Nature reserve:

- *To increase awareness of the importance of wildlife of our coast, waterways, woodlands and **meadows**.*
- *To educate people about the importance of particular habitats in order to conserve the creatures and plants they value, which are dependent on those habitats.*
- *To encourage local people to get involved in protecting and enjoying our great diversity of local wildlife.*
- *To increase and share the knowledge held about particular creatures and sites.*
- *To influence man's activities to be more sensitive to local wildlife needs.*
- *To enhance and protect existing habitats and actively create new one's.*

As a village community we feel that in accepting the inspector's decision with regards to Bryncoch Farm the National and Local Biodiversity Action plans and their objectives have not been properly applied or considered when in fact they should have been of fundamental importance and integral in the decision making process given the clear ecological sensitivity of the site from information which was already available and known to the Neath Port Talbot County Borough Council at the time of the inspectors enquiry.