

## Agenda Item 24 Appendix 2

### Letter from wildlife groups to 22 June ECSOSC

#### Don't lets bash nature conservation in Brighton

**Briefing notes on the cessation of conservation mowing grass collection on City wildlife sites**

*Brighton and Hove Wildlife Groups Forum Spring 2009*

#### **The decision to end the grass collection service on mown conservation grasslands is a big blow to nature conservation in Brighton.**

Maureen Connolly , of the Friends of the Green Ridge, describes it as “un-doing all the good work we have done over the past ten years”.

Many open spaces and wildlife sites have benefited tremendously from the improvements in management over the past decade and more, which have seen the introduction of grass collection with the ‘Downland cut’. Sites like Bexhill Road Woodingdean, Ladies Mile, and parts of Whitehawk Hill have seen a greater flourishing of wild flowers and butterflies than ever before.

This service has brought two different kinds of benefit.

**Firstly**, amenity lawns previously managed merely by regular mowing and devoid of most wildlife interest have seen a great flourishing of their wildlife, to obvious public enjoyment. (We think of sites like The Green Ridge, parts of Shepcote Valley, and Bexhill Road).

**Secondly**, previously under-managed sites have seen hope of a revival of their core wildlife assemblages. (We think of the crown of Race Hill, where the old chalk grassland interest was only recently widely recognised, and which has the best City site for rare ‘old meadow fungi’).

#### **The facts...as far as we have been told them**

Grass collection was stopped last year on these wildlife sites because it had become more expensive and because of the problems of disposal of the cut product.

Thus, the budget for conservation mowing last year (2008) was £15,000, whereas Council officers estimated a cost increase to between £28,000 and £48,000 (depending on the weather) “due to increased fuel and composting costs”.

The Environment Agency have vetoed the Council’s past messy practice of dumping the baled grass at Stanmer, because the cut material rots and the leachate soaks into the chalk aquifer.

This means that the Council must compost the baled material or expensively dispose of it to land fill.

The council is currently seeking a composter, and is looking at 2 businesses: KPS (at Scaynes Hill and two other sites) and one other near Littlehampton.

Additionally, the Council rejected out of hand an application to compost the material from Brighton Community Compost Centre (BCCC), at Upper Lodges, Stanmer Park, who have done some of the Council's composting till recently.

Rodaways of Chailey, the past contractor, gave up last year for personal and business reasons. The Council bought a mower of their own and mowed very late last year 'in house', without collecting.

The cut grass is not readily marketable because it is low in nutritional value due to its mostly late summer harvesting (known in council practice as a 'Downland cut'). It could be cut at hay time (May/June) and perhaps have more saleability, but such a date would affect the flowering and seed setting of the grass and herbs, and their invertebrate assemblages.

### **The Council's argument**

The council argues that the conservation grass collection service will be adequately replaced by the new, extended, Grazing Project.

This Project will work at a much wider, agricultural scale of grazing. At present grazing has been experimental only, covering sites of not more than a few acres for very limited periods of time.

The Council is applying for Higher Level Stewardship funding, which is a new government agro-environmental support scheme. Local councils can now apply for this funding on land they manage, which they have not been able to do before.

The Council argue that the cessation of this service "is not a cut", because the expenditure overall is rising.

### **A win-win solution to a very solvable problem**

#### **1. "Horses for courses": re-jigging existing budgets to maximize benefits**

At the same time as this service cut has taken place the Council has voted a very welcome £100,000 increase in the budget for mowing of the City's amenity grasslands – verges, parks, greens and so on - which will be mown to a new regime, as required to keep them 'in good order', rather than on a three weekly cut, as has been the case heretofor.

Yet on some sites user groups have been arguing for years for a *less* intense mowing regime to increase wildlife interest. There will be many urban parks and green spaces that do not need *comprehensive* additional mowing and some will need *less* mowing in parts.

There is lots of room here for the careful working out of the new mowing regime, so that *both* the concerns of neatness and good order and the concerns for biodiversity and traditional Downland sites are addressed.

Thus, the Friends of Withdean Park have been arguing for years for *less* mowing of part of the Park. The Brighton Urban Wildlife Group, has, too, over decades, been arguing for a more flexible approach to Park and amenity mowing to increase the wildlife interest and visual variety of our grassed areas.

#### **2. Saving money: composting**

The cost of grass collection and composting does not have to rise as has been predicted. Brighton Community Compost Centre (BCCC) could undertake the composting service much

cheaper than a distance composter can do. They are a not-for-profit business with an existing track record of working for the Council and have the skills, experience and willingness to undertake the work.

The Council's rejection of them was contrary to government guidelines encouraging the use of social enterprises. It showed an over-caution which is likely to cost the Council dearly in service delivery or in cash.

If the Council rejects the use of this on-hand local solution they can still undertake the composting in-house. They have the land and they can easily commission the expertise if they feel they do not have it already.

### **3. Saving money: mowing and collecting**

Other local contractors are available to tender for the conservation mowing and collecting service at economic rates. One local farmer described the argument that local farmer-contractors were not interested as "nonsense" and expressed his own eagerness to tender.

The argument that farmers' use of cheap red farm diesel was no longer possible is also not correct. There is no reason why contractors cannot use red farm diesel for this service.

It may be possible, in any case, to use the collected cuttings as an agricultural field dressing.

### **Myths**

The Council has argued that the **proposed Grazing Project** will replace grass mowing and collection. However, the Grazing Project - to make any sense - will have to concentrate on those old Down pasture sites that are too steep to mow (such as Whitehawk Hill slope and Moulsecomb Wild Park slopes). It would make no sense to focus on flat, tractor-accessible areas which can – in the immediate term – be mown, when these steeper areas have been without conservation management sometimes for 80 years and more !

### **The two management tools complement each other. They do not duplicate each other.**

Furthermore, the Grazing Project will have to be introduced very carefully, on a site by site basis, as a result of consultation and negotiation with local communities, and with the mobilization and training of whole tranches of new volunteers. There will also be infrastructure to construct – new fencing, water supplies, and so on, and new scrub control to complete (so as to reduce risk of sheep entanglement and enable easy shepherding of the flock). The Grazing Project will also take time to gather a new flock(s) and to expand from its current very tentative and small scale experiments.

Conservation grazing is not profitable, overall, despite producing valuable premium meat products. If the council put resources into grazing the nutritionally better, more commercially viable grasslands (such as 39 Acres) they will detract from the task of grazing long-neglected high biodiversity sites. (This is exactly what happens on many private farms under the recent ESA and Countryside Stewardship agro-environmental schemes).

The council has set aside **no** budget of its own for the Grazing Project. It is entirely reliant on the success of its forthcoming bid for Higher Level Stewardship funding. There is no guarantee that this bid will succeed.

The Council has thus cut one service without any guarantee that any part of it can be replaced by any new source of funds. Yet this has not prevented them from arguing that the new Grazing Project will do just that.

**There is absolutely no way that the Grazing Project can fully substitute for the mowing service on urban and urban fringe Downland. This is a complete smokescreen.**

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### **The management of chalk grassland valued for wildlife**

**Conservation grass mowing and collecting of the cut material** is one of the core management techniques for maintaining and enhancing the biodiversity of chalk grassland, which is the City's primary wildlife resource and the one for which they have the clearest international responsibility (for it is both globally a very rare ecosystem, and a very threatened one).

Grazing and scrub control are the other main techniques.

Without the use of all these techniques the more delicate herbs and grasses are out-competed by the more vigorous species, and diversity steeply declines. Swards in which 30-50 herbaceous species and many more lower plants and old meadow fungi grow are replaced by one or two tall grasses, at the base of which a nutrient-rich 'thatch' of dead material accumulates.

Grazing is by far the best technique in most cases. Sheep grazing has been the traditional management of most species-rich chalk grassland from medieval times onwards, with cattle grazing on a small fraction of the Down pastures.

**Mowing-and-collecting will always be an essential tool on many urban and urban fringe sites, on very fragmented and small sites, and on parts of other sites subject to heavy public usage. It does not require fencing or water supply, is less labour-intensive, and does not raise animal welfare issues or conflict with user groups.**

**Each kind of grazing, together with mowing, encourages a different sward type.** Thus, sheep grazing encourages a closed, flower-rich sward, which is also good for many emblematic old Down pasture butterflies, like the Blues. It is also good for most lower plants, like mosses, and lichen. More intensive grazing is essential for many species that depend on an open sward with some bare ground, like some rare moths. Cattle grazing is best for some threatened molluscs, like Heath Snail and Carthusian Snail. **Mowing creates a range of different micro-habitats (because it passes an even cut over uneven ground) which can be good for some invertebrates. It can also be modulated more readily (for instance, by close-mowing walkways and leaving adjacent areas for an annual or twice-annual cut).**

Grassland which is cut and the cuttings **NOT** collected loses its biodiversity value over time (as on the Benfield Hill LNR west slope when it was managed in the past by the West Hove Golf Club).

Grassland which is **NEITHER** cut **OR** collected loses value much quicker (as on the Woodvale 'meadow' site).

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## LIST OF AFFECTED SITES

### 1. **Waterhall 19 Acres (south valley, south side plateau grassland, alongside Devil's Dyke Road)**

Urban fringe. Heavy public usage. Part of the 2 mile long walking route to the Devil's Dyke. (See 2 below). Fully accessible because on level ground. Dramatic viewpoint. Part of a very important wildlife site: - the Waterhall complex of old Down pasture, re-established chalk grassland, and old and new scrub thickets. Part of a deeply neglected area that has a 70 year deficit of conservation management.

### 2. **Devil's Dyke Road roadside strip (between Saddlescombe Road turnoff and Devil's Dyke Farm)**

Part of the 2 mile long walking route to the Devil's Dyke. (See 1 above). Heavy public usage. Important introductory site for many walkers to Downland wildlife. Fully accessible because on level ground. Dramatic viewpoints. Part of two very important wildlife sites with mixed grassland, bare ground and scrub (Waterhall and the Dyke Golf Course). Has some Waxcap old meadow fungi species.

### 3. **Waterhall north valley (north of Golf Clubhouse)**

Urban fringe. Heavy public usage. Fully accessible because on level ground. Moderate views. Important piece of chalk grassland restoration in a very neglected complex which has been deteriorating for 70 years.

### 4. **Beacon Hill LNR, Rottingdean.**

They make their own arrangements because they have generated their own funds.

### 5. **Bevendean Down LNR**

Urban fringe. Heavy public usage. Relatively accessible, though a minority of the mown ground is on steeper contours. On high ground with good views of Bevendean Valleysides. Part of a very important Local Nature Reserve complex of old Down pasture, re-established chalk grassland, old and new scrub thickets. Part of an area that has a 30 year deficit of conservation management.

### 6. **Bexhill Road Open Space, Woodingdean**

Urban fringe. Heavy public usage. Fully accessible because on level ground. Dramatic viewpoint. Very exciting site with steep increase in attractive butterflies and grasshoppers and Downland herbs, since the excellent new wildlife-friendly management came in.

### 7. **Braeside Avenue Open Space (alongside the A27 Bypass, and adjacent to Ladies Mile Open Space, Patcham).**

Urban fringe. Heavy public usage. Relatively accessible, though the mown ground is on a slope. A greatly welcome extension of the chalk grassland fragments islanded at Ladies Mile Open Space.

### 8. **The Chattri**

Heavy public usage. Very important cultural monument. Relatively accessible because on level ground. Dramatic viewpoint. It's grounds should be tended with the same reverence as the Pavilion's grounds. Its excellent plantings have been of heathy plants which reflect the

site's past history as 'chalk heath'. Such plants, of course, are intolerant of nutrient enrichment, which uncollected cuttings cause.

**9. Cliff edge grasslands: western clifftop and eastern clifftop (from Ovingdean to East Saltdean), Marine Drive orchid site, and Roedean carpark.**

Over 3 miles of nationally important cliff edge, plus a major wild orchid site (with Autumn Ladies Tresses). SSSI and adjacent to SSSI. (These are nationally important statutorily protected sites). Urban & urban fringe. Heavy public usage. Fully accessible and often on level ground. One of the best and most iconic Brighton sites. A mixture of relict maritime grassland, old chalk grassland and restored chalk grassland.

**10. Foredown allotments, Portslade.**

Urban fringe. A flagship accessible allotment site for the disabled (who are so often excluded from wildlife sites by access problems).

**11. The Green Ridge, Patcham**

Urban fringe. Heavy public usage. Fully accessible because on level ground. Dramatic viewpoint. Gateway site to the open Downs. Lovingly tended by one of the oldest community 'Friends' groups. Has been consistently managed to a high standard for many years - and seen a major rise in its biodiversity.

**12. Happy Valley, Woodingdean**

Urban fringe. Heavy public usage. Fully accessible because on level ground. Adjacent to an old, farm-grazed chalk grassland site to which its present wildlife conservation management is re-connecting it.

**13. Moulsecoomb Wild Park**

Urban fringe. Very heavy public usage. Heavily compromised as a site for children's free play by the extensive scrub cover and the busy A270, which both create child safety problems. A nationally famous lepidopterists (moths and butterflies) site a century ago, now reduced to the edge of extinction, but remarkably clinging on to its core old Down pasture interest against all the odds. Been neglected by the Council for the whole 80 years of its existence. Needs an expansion of BOTH mowing and grazing management, not a contraction.

**14. Hollingbury Hillfort**

Urban fringe. Heavy public usage. Fully accessible because on level ground. Highly dramatic viewpoint. A first class wildlife site, continuous with the Wild Park old Down pastures. Very important acid grassland habitat with an excellent old meadow fungi (Waxcap) assemblage, with species more typical of the Wealden heaths. Wonderful spring orchid display (Early Purple Orchids). Important Gorse thickets. Old and very under-managed chalk grassland on the earthworks.

**15. Hollingbury LNR - 39 Acres.**

Urban fringe. Heavy public usage. Fully accessible because on level ground. Dramatic viewpoint. Part of a very important wildlife site: - the Hollingbury Castle-Moulsecoomb Wild Park complex of old Down pasture, re-established chalk grassland, and old and new scrub thickets. Part of a deeply neglected area that has an 80 year deficit of conservation management.

#### **16. Hollingbury Park, Ditchling Road.**

Urban fringe. Heavy public usage. Fully accessible because on level ground. Dramatic viewpoint. Adjacent to a major orchid site (Early Spider Orchids) to which the present Downland management will - in time - reconnect it. This is a model initiative to render an important and very rare Downland Orchid population more sustainable.

#### **17. Chelwood Flats Open Space, (north of Stanmer Heights Estate, Hollingbury)**

Urban fringe. Heavy public usage. Relatively accessible, because on gently sloping ground. Fine long views. An area that has been increasing in wildlife importance, with good displays of orchids.

#### **18. Ladies Mile Open Space, Patcham**

Urban fringe. Heavy public usage. Almost all fully accessible, because on level ground. Fine viewpoint. This is one of the top old Down pasture sites on the urban fringe: - remarkable for preserving a large extent of intact *plateau* chalk grassland. (Plateau chalk grassland is nearing extinction through loss to ploughing and chemical sprays). Large swarms of Yellow Rattle, Dropwort, and Harebell. These species are particularly vulnerable to loss from mulching by grass cuttings. Good archaeology (Iron Age field lynchets and Bronze Age burial mound).

#### **19. Varncombe Barn Model Aircraft Site, Saddlescombe Road.**

Regular public usage. Fully accessible because on level ground. A small site near to other relict old Down pasture sites, which its current wildlife-friendly management helps to move towards sustainability.

#### **20. Sheepcote Valley**

A very major chalk grassland restoration site which is increasingly at risk even with current levels of management. Urban fringe. Heavy public usage. Fully accessible because on level ground. Dramatic viewpoint. Its interest almost entirely lies in its *early successional stage* wildlife – ‘arable weeds,’ which need disturbed ground (like Venus’s Looking Glass), open chalk grassland (which the Bee Orchids and the famous swarms of Creeping Bellflower need), and ground nesting birds (Skylarks and Meadow Pipits).

#### **21. Stammer Park LNR - Great Wood archaeological sites.**

Important woodland glades, which are already greatly more attractive with their better Downland management. Urban fringe. Heavy public usage. Fully accessible because on level ground. Provide important variation in relatively structurally similar woodland.

#### **22. Stanmer Park LNR - Great Wood and Marquee Brow.**

Urban fringe. Heavy public usage. Fully accessible because mostly on a gentle slope. An important area of chalk grassland restoration. Important, too, for providing structural variation to the Great Wood vegetation, and important nectar sources. Has many important species on site and close by, such as Adder’s Tongue Fern and Orchids.

#### **23. Whitehawk Hill LNR – Wilson Avenue old allotments: Compartment 3 of the Local Nature Reserve Management Plan.**

Urban fringe. Heavy public usage, particularly by children. Would be fully accessible if present management improved because on level ground. Good viewpoint. Very under-managed even with present arrangements. Only British site for the Whitehawk Soldier Beetle. Needs *more*, not less management.

**24. Whitehawk Hill LNR - Tenantry Down: Compartment 2 of the Local Nature Reserve Management Plan.**

Urban fringe. Heavy public usage. Fully accessible because mostly on level ground or gentle contours. Arguably the best and most dramatic viewpoint on the entire urban fringe. At least 10 prehistoric camps visible from it. The best old meadow Waxcap fungi site on the urban fringe, with at 14 species recorded, including Pink Gills and Fairy Clubs. A rare piece of (almost extinct) plateau Down pasture. Present management is inadequate. Need increasing to at least two cuts and collection annually.

**25. Whitehawk Hill LNR – Neolithic causewayed camp: Compartment 7 of the Local Nature Reserve Management Plan.**

Urban fringe. Heavy public usage. Important view both for amenity and archaeological landscape interpretation. Fully accessible, because mostly on level ground or gentle contours. Definitely the most important archaeological monument Brighton has. One of the ten best preserved causewayed camps in Britain. Camp ramparts have a good old down pasture flora, and enclosure area is greatly improving with current cut-and-collect regime. The area south of Manor Hill has good open and semi-open ground with good displays of characteristic short-lived herbs.

**26. Whitehawk Hill LNR - Hilltop overlooking Craven Vale: Compartment 9 of the Local Nature Reserve Management Plan.**

Urban fringe. Heavy public usage. Important view both for amenity and archaeological landscape interpretation. Fully accessible because mostly on level ground or gentle contours. Important mixed areas of grassland and scrub with good invertebrates and colourful wild flowers. Under-managed at present. This currently makes it at risk of occupation by homesteaders.

**27. Withdean Woods**

A small area which provides important structural variation in this largely woodland site.