

My comments at the last ECSOSC emphasised the importance of a Biodiversity Action Plan (BAP) which currently BHCC has not got one of its own. We are partners in the Sussex BAP process, but as a distinct urban area and Unitary Authority we should have our own, with our own objectives and targets specific to our own conditions embedded within it.

The BAP would underpin all other nature conservation and management work, and hopefully lead seamlessly on to developing a coherent, comprehensive and costed set of management plans for all sites of conservation interest in the City. The work within them would need adequate resourcing to ensure delivery. The importance of proper management plans cannot be overstated as it ensures that continuity of management, and avoids ad hoc decisions being made for financial or other transitory reasons that could result in loss of biodiversity. Continuity of management is vital – even one year of different (or absent) management practice could result in a species being unable to breed, and possibly become extinct from a site.

The move to grazing on sites as discussed in the last ECSOSC can be a very beneficial thing, although it presents all sorts of practical (animal welfare, access to water for livestock etc) and cost implications. However, it may not be appropriate on all sites, or be the most cost effective at all times.

It is true that grass cutting has many drawbacks, as stated in the officer report, and at times grazing is clearly preferable for practical (eg steep slopes) or conservation reasons.

Given assurances that cutting continues on the downland sites, the lack of collection and composting remains of some concern and measures to address this need as part of effective downland management should be finalized as a matter of some urgency.

Where management has been undertaken on a site over many years – even where this is sub-optimal – it is important (in relation to this matter) to continue with previous practice until such a time as improved management is agreed and available. If grazing is to be introduced, the previous management (cutting) should be continued until the year in which the sheep are to be introduced to the site.

The officer's **briefing** did not address the impacts of the manner in which management changes are being implemented. The key issue **for the grazing plan** is not whether grazing or cutting is best for management, but ensuring that the shift between management methods, when such occurs, is undertaken in a considered and deliberate way.

Councillor Sven Rufus

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