The British Lichen Society c/o Royal Society of Biology Naoroji Street London WC1X WC1X0GB

British Lichen Society

Geraint John Planning Ltd
Office 16 (House 1, 2nd Floor)
The Maltings
East Tyndall Street
Cardiff CF24 5EA
By email: consultations@gjplanning.co.uk
11th April 2024

Dear Sir or Madam,

Consultation for Land at Nant Y Bai Forest, Rhandirmwyn

The following is a response by the British Lichen Society (BLS) to the pre-application consultation for "Land at Nant Y Bai Forest, Rhandirmwyn – Proposed Bike Park and Associated Facilities".

The British Lichen Society is surprised that a proposal has been made to develop part of Mwyngloddfa Nantymwyn SSSI as part of a bike park by developing mountain bike trails across the SSSI. Among other features this SSSI is notified for the metallophyte lichens. The SSSI citation description of this lichen interest is as follows:

Abundant mine spoil of varying sizes supports a diverse range of lichens and lichenicolous fungi (fungi that parasitise lichens). These include at least 32 species that are either restricted to metal-rich substrates (obligate metallophytes) or grow most often on metal-rich substrates (facultative metallophytes). Especially prominent are extensive greyish-white patches of the coral-like *Stereocaulon condensatum*, *Stereocaulon dactylophyllum* and *Stereocaulon glareosum*, as well as the smaller, rock-dwelling *Stereocaulon nanodes* and *Stereocaulon pileatum*, and the rusty-red *Rhizocarpon oederi*. Smaller species include the obligate metallophyte *Gyalidea subscutellaris*, the largest known population of the Welsh endemic *Gyalideopsis crenulata*, and at least three members of the genus *Vezdaea*.

As an SSSI notified for metallophytes lichens, our position is that the site should not be developed. The proposed bike trails will damage areas of interest for the notified lichen feature, even with the modifications proposed. It is also important to note that a good deal of the lichen interest on this site takes the form of fragile mats of ground growing lichens (terricolous biofilms). These cannot be translocated and are likely to take a long time to re-establish on disturbed areas and are easily disturbed by ancillary pressures. Given this, any damaged to the SSSI will not be easily compensated for and it is probable this proposal will damage the nationally important lichen interest at this site. In addition, it should be noted that proper management of the SSSI is already a legal obligation so this should not be a consideration in determining the application.

Yours sincerely, Neil A Sanderson

Neil A Sanderson

Conservation Officer, British Lichen Society

(Email conservationofficer@britishlichensociety.org.uk & Phone 07765 648149)

The society is a Charitable Incorporated Organization (number 1194213)