

# Merthyr Tydfil Replacement Local Development Plan 2016 to 2031 Examination Hearings

## Hearing 4: Strategic and housing site allocations SW3.31 Cwmfelin, Bedlinog Thursday 27 June 2019

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### Submission by Jim Davies (participant 287)

#### Background

1. This statement is submitted to the Examination by James N Davies (Participant No 287), a local resident of Bedlinog, and is concerned primarily, though not exclusively, with Policy SW3.31. Day 3 of the public examination is dealing with strategic and housing site allocations. It aims to cover site specific aspects, within the overall context of assessing the soundness of the Plan, as well as its legal compliance.
2. The Focused Changes have resulted in a reduction in the number of houses allocated to the site at Cwmfelin, from 50 to 30. Despite this, the extent of the site has not diminished and still poses a significant threat to the survival of wildlife and species as will be specified. The purpose of this submission is to amplify further the concern expressed at earlier stages regarding an inappropriate allocation, with the conclusion that the only alternative is to delete the site. No amount of mitigation is likely to suffice.

#### Overview of site biodiversity importance

3. The worldwide decline of the Entomo-fauna [insects] has been very significant. A review of its drivers appears in Biological Conservation, vol 232, April 2019 p8-27. Urbanisation is regarded as a key driver. Singled out are Dung Beetles and Detritivores. It is not clear what happens if animal faeces and fallen leaves fail to rot. The FAO commentary on this major co-operative review is contained in the 'The State of the World's Biodiversity for Food and Agriculture'.

#### Losses of habitat and species locally

4. There have been significant insect losses locally. At the 25 May 2019 gathering of regional Biologists at Nant Llwynog Park adjoining the SINC site, a scarcity of several insect groups was noticed. These included important Hoverfly species, whose principal prey is the gardener's pest, the greenfly aphid.
5. Fire damage has also been significant. This 2019 late spring has seen 5 bracken fires within 1km of the SINC site. Of these, three have been on old ground Anthill areas (see photo attached). Such extents take 100 years to re-accumulate their full biodiversity. Cwmfelin SINC's intact, undamaged Anthills must be retained intact.

#### Inspector's questions

6. Apart from doubtful deliverability, the site does not accord with Plan objectives, in relation to ecology and landscape character. Its development would be detrimental to the delicate landscape and ecology of the South Wales valleys and to this part of Merthyr in particular. The development of this site would interfere with the movement of wildlife species, northward up the valley. This is a matter of fragmentation of habitats, and is to be avoided if biodiversity is to flourish. The site must be deleted from the Plan.

## Fire damage

The picture was taken at lower Bedlinog. The bracken rhizomes were unaffected but general biodiversity was set back 100 years. This includes damage to colonies of *Lasius flavus* the Meadow Ant.



Fire occurred 11 April 2019  
Date of picture 14 May 2019

## Fire at Co-op Fields, Railway Bridge upper Bedlinog, 12 April 2019

Mainly coarse grasses and bramble affected. The SINC site is 300m to east.

