



Mrs Victoria Cordeiro  
Director  
Department of Planning  
44 Church Street West  
Hamilton, HM12

7 May 2025

**Re. Objection to Application P0086-25**

Dear Mrs Cordeiro,

As advocates for Bermuda's protected open spaces and natural environment, as well as the unique wildlife and plant species that rely on these habitats for their survival, we must object to application P0086-25. This is the proposed zip line adventure course in Southlands Park, South Road, Warwick and change of use request for 'Dapples', 77 South Road, Warwick. Our concerns are outlined below.

**Lack of an Approved Management Plan for Southlands Park**

Part IV of the Bermuda National Parks Act requires that a management plan be developed for each Park. The management plan for Southlands Park is still in its draft form and has not been made available to the public for review and comment.

Furthermore, Section 14 of the Act requires that existing conditions be protected until the plan is in effect, stating: "Until a management plan required under this Act is in effect for a protected area, management of the area shall be undertaken in such a manner as to ensure protection of the natural or historic features that existed at the time of its declaration as a protected area and no change of use that may, in the opinion of the Minister, diminish the natural environment or historic features shall be allowed."

It is, therefore, premature for this proposal to be considered at this time and no significant changes to the park can be allowed until the management plan is enacted in its final form. Added to this, we believe that the Escape from Devils Isle proposal will negatively impact both the natural and historic features of the park.

Separate to this application, and contrary to the requirements of the National Parks Act, we note that a large area on the western side of the property has recently been cleared of all plants and trees, and horticultural waste has been dumped on the south side of the park.

This was also done in the absence of an approved management plan and has resulted in the loss of a significant amount of tree canopy and forest habitat.

### **Lack of Compatibility with Existing Draft Management Plan**

Even if the existing draft management plan were to be approved and put in force, the proposal is not compatible with the Mission and Objectives the draft plan in its current form.

#### *5.1 Mission Statement*

The Mission Statement of the Draft Plan is to “conserve and promote the historic, cultural and environmental qualities for future generations.” This proposal will have an overwhelming influence on all aspects of the park as the proposed 3 ½ miles of zip lines cover large areas and are not compatible with the conservation of the historic, cultural or environmental qualities of the park.

#### *5.2.1 Resource Management and Protection*

Objective A: “Allow only minor site work and structures to be built that are essential to the maintenance, conservation or enhancement of the National Park.” This proposal requires numerous structures and site clearance to allow for the four zip lines. These would not be considered “minor”. Nor is this development essential to the maintenance, conservation or enhancement of the National Park, especially given the intended mission. While zip lines may work in other, larger parks around the world. Southlands Park is too small to accommodate the number of structures required to make this a success. They will overwhelm the whole area.

#### *5.2.2 Tourism, Sports and Recreation*

Objective C: “Offer guided walks, tree canopy walks and bird watching.” The proposal being considered is much greater than a simple tree canopy walk. A tree canopy walk is typically a slow-paced, elevated walkway often made of rope, wood or metal. It is designed for walking and observing the forest from above. It emphasizes ecotourism, education and nature appreciation. A zip line is a high speed ride on a pulley system along a suspended cable. Riders glide quickly from one point to another and it is primarily recreational and adrenaline focused. Escape from Devils Isle’s Zip Line Adventure is described in the Grounds for Support as including “an adrenaline pumping duel super zip line for those adventure seekers.” We believe that this is largely out of keeping with the intended tree canopy walks and the overall vision and mission for Southlands Park.

### **Lack of Consultation by the National Parks Commission**

PAR.2 and PAR.4(2)(e) required that the National Parks Commission be consulted on applications for development in the National Parks and that they do not object to the proposal. The National Parks Commission has not yet been presented this proposal for their comments and advice nor given the opportunity to register an objection.

### **Lack of Support from the Public**

As part of their due diligence in preparing the Management Plan for Southlands Park, the Department of Parks conducted a survey of the public. The majority felt that the park should remain in as natural a state as possible. The presence of four courses will have a huge impact on this National Park and the experiences of those who wish to enjoy it.

### **Incomplete Application - Omission of detailed drawings**

In addition to requesting permission to construct four zip line courses through the Southlands National Park, the application also requests permission for a change of use for the building 'Dapples', 77 South Road, from residential to business. In the Cover Letter, there is also a reference to commencing the building renovations for 'Dapples' "on or about November 1<sup>st</sup> 2025".

Contrary to APC.3 (b) of the Bermuda Plan however, there are no plans, elevations or cross-sections that clearly describe these proposals, and contrary to APC.4 (b) there is no detailed visual impact study or images of the proposals as viewed from key locations. While a zip line brochure has been submitted as part of the application, these drawings show examples of poles, platforms and courses from zip lines in the United States. It is not clear which of these they intend to use in Southlands. The drawing submitted as part of the conservation management plan only shows a bird's eye view of where each zip line course will be located.

While there is considerable wording about the zip line aspect of the proposal, there is no indication whatsoever about how they intend 'Dapples' to look, once renovated. In fact there are no drawings related to 'Dapples' at all.

This lack of detailed drawings also prevents us from being able to accurately assess whether or not the proposed development meets the requirements specified in PAR.4. Until we know exactly how the poles and platforms will look and what materials will be used in their construction beyond just "timber", we cannot know what adverse impact they may have on any feature of special environmental value or scientific interest. Nor can we determine whether or not they will be detrimental to the natural or visual quality of the area by reason of their location, size, design or appearance.

### **Parking and Pedestrian Access**

An attraction of this size requires considerable space for vehicular parking which would include bikes, cars, taxis and buses. The Grounds for Support states that "staff and visitor parking will be on the southern side of South Road and on Southlands property in the current field area west of the beach entrance."

There are no drawings however, to illustrate how parking will be managed. How will it be constructed in order to comply with the various components of the Bermuda Plan that relate to Parks? How will visitors and staff safely cross the busy South Shore in order to get

to the zip line course? Will there be a pedestrian crossing? How many people do they expect to use the course at any one time or during any one day? These are all questions that must be answered and considered in the evaluation of this proposal.

### **Application contradictions**

There are also contradictions in the Grounds for Support which further concern us. For example, they describe the utility poles and platforms for the zip line courses as “non-permanent structures which are also non-invasive,” yet they write that each tower/pole would be placed “in the same manner as a common utility pole by using an augur.” The use of an augur implies that they will be drilling foundation piles which will then be filled with concrete to support the structure. Concrete is permanent.

The Grounds for Support also says that they have “ensured that all of our intended zip line courses do not interfere with any of the established walking trails throughout Southlands Park, allowing the general public continued enjoyment of the park as intended.” As mentioned above, given the size of Southlands, this is simply not possible. For those who enjoy walking around the park for its peace, serenity and atmosphere filled with the natural noises of nature, shouts and screams from zip lines above them will very much interfere with their enjoyment of the park.

Before any other decisions are made for this unique national park, the public deserves to know the plan for the whole area and how this will benefit everyone who has a right to enjoy this place of outstanding natural beauty.

We don't deny that zip lines are fun and, when done right, provide an enjoyable and alternative way for people to enjoy nature. Unfortunately, Southlands Park is too small for this proposed zip line development. Escape from Devils Isle has taken an idea that works in the United States and other larger countries around the world, and tried to implement it on a small island without taking the limited size of Bermuda's few remaining areas of open space and park land into consideration.

We believe that his application should be refused, as the proposed development fails to meet the requirements of the Bermuda National Parks Act 1986, the policies of the Bermuda Plan 2018 and the guidelines of the Draft Management Plan for Southlands National Park. These laws, policies and guidelines are designed to ensure that the Bermuda's National Parks are best managed for the benefit of the greater community and should be respected. Thank you for your attention to our concerns.

Sincerely,

Janice Hetzel