



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

15 July 2025

Re: Objection to P0159-25 – 73 South Road, Warwick

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 P0159-25. This is the proposed renovation of, and change of use for, Quarry Cottage in Southlands Park.

Lack of an Approved Management Plan for Southlands Park

We have said it before, and we will continue to say it again for as long as it is relevant: There is still no approved management plan for Southlands Park. We are very concerned that this continued approach of piecemeal applications, which also include P0157-25 for the proposed Southlands Park amenities and P0086-25 for the proposed zip line adventure course, will ruin a highly valued National Park.

As you know, 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.”*

We would therefore like to request that all these piecemeal applications stop until the management plan for Southlands Park is enacted in its final form.

Change of Use Procedures

Part II, section 4 of the Bermuda National Parks Act states that:

- (1) *The Minister shall by notice published in the Gazette announce any proposal for –*
- a. *The construction of any road or building, the change of use, or the change of boundary with respect to a protected area.*

It then goes on to say:

and shall give opportunity for and shall take into account public comments before acting on the proposal

- (2) *A notice under subsection (1) shall specify the nature of and the reason for the proposed action, and the time within which and manner by which public comments will be received.*

These change of use procedures have not been followed for P0159-25. The notice was not published by the Minister. Nor does this particular application specify the nature of, and the reason for, the proposed renovation. It simply states “Change of use to office”, without explaining why this is necessary and what the building will be used for.

Lack of Compatibility with the Bermuda Plan

This application is also incompatible with a number of aspects of the Park section of the Bermuda Plan, namely:

- Contrary to PAR.3, no conservation management plan (CMP) has been submitted. Given that the proposal is to extend the building and, therefore, the site coverage, we believe this should be required.
- Contrary to PAR.4 (2) (a) the application does not explain how the proposal is essential to the maintenance, conservation, enhancement or enjoyment of the park.
- Contrary to PAR.4 (2) (e) the public has not been made aware of whether or not the National Parks Commission approves of or has objected to the proposal. Has the National Parks Commission even had the opportunity to review the proposal yet?

This could, potentially, be remedied if there was a final management plan and one, overarching planning application covering the proposal for the entire of Southlands Park. This must then be reviewed by the National Parks Commission before being made available to the public for their feedback. Bermuda’s National Parks belong to the Bermuda public.

The Bermuda Audubon Society strongly supports investment in our public parks, but only when it is guided by strategy, consultation and ecological responsibility. The Department of Planning and the DAB have a responsibility to ensure that all requirements under the National Parks Act 1986 legislation are satisfied before approval is given for any development in our National Parks. Also, that any such development preserves this exceptional area of green space, which contains unique natural and historical value, for current and future generations.

Thank you for considering our concerns.

Sincerely,
Janice Hetzel