



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

25 June 2025

**Re: Objection to P0157-25 – 81 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 P0157-25. This is the proposed Southlands Park amenities at 81 South Road, Warwick.

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

While we have many concerns about this proposed development, one of the gravest is the fact that there is still no approved management plan for Southlands Park and that piecemeal applications such as this one and P0086-25 for the proposed zip line adventure course, could ruin a highly valued National Park.

In addition to this, 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 any application 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 proposed amenities, due to their size, scale and location, will negatively impact both the natural and historic features of Southlands 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 park to the north of South Road has already been cleared of all plants and trees, and further clearance and works appear to be underway. This work has not been conducted in a transparent way. Why has this happened without an approved management plan? This is a public park and the public, therefore, deserves to know what is going on.

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

### *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.” We believe that covering over such a huge expanse of the park with 51 parking spaces, 76 cycle parking spaces, 9 mini bus and taxi parking spaces and a 5,238 sq. ft. café capable of seating 120 people, is an unnecessarily large development for Southlands Park and does not conserve or promote the historic, cultural or environmental qualities for future generations.

### *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.” As mentioned above, this proposed development is very large and can in no way be considered “minor site work or structures”. We do agree that our National Parks require better amenities, in particular well-maintained bathrooms, but not to the scale proposed in this application.

## **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. This application does not, therefore, support what the public wants.

## **Lack of Compatibility with The Bermuda Plan**

PAR.2 of the Bermuda Plan states the need for comments and advice from the National Parks Commission regarding any development proposed within a park protected under the Bermuda National Parks Act. The Commission, however, has not been convened since the general election in February and has therefore not had an opportunity to review any recent applications related to Southlands Park.

Contrary to PAR.4 (c), (d) and (e), a development proposal of this size is very detrimental to the natural and visual quality of the area by reason of it’s location, size, design and appearance; No natural materials appear to be incorporated into the development designs, and the National Parks Commission is not in a position to object or approve this application because, as mentioned above, it has not been convened since February.

## **Conservation Management Plan Concerns**

While we note the inclusion of a Conservation Management Plan (CMP) in the application, we are concerned about its implementation and whose responsibility this will be. The Department of

Parks is operating with around one-third fewer staff than needed. How will they be able to implement the CMP effectively? Have adequate funds been allocated to cover the short and long term costs of the proposed management plan? Do they have an adequate supply of native and endemic plants to implement the plan? These are all questions that need to be answered before approval is given for this ambitious conservation effort. We need assurances that the replanting programme will take place in a timely and effective manner and then maintained over the long term. In particular, extensive invasive species removal should not take place until replacement plants of the appropriate size and species are available and a long term commitment of finances and manpower is made to manage the area.

The CMP also fails to identify the exact locations of specimen native and endemic trees and shrubs. Clear procedures need to be in place to ensure that these plants are not damaged or removed in the implementation of the CMP. Of particular concern is the grove of Yellowwood trees that sits opposite to the Banyan Tree entrance to the park and appears to be directly within the circle of clearance at the eastern end of the woodland walking path. Yellowwood trees are considered, locally, to be “Critically Endangered” and they are legally protected by the Protected Species Act, the Protected Species Amendment Act and the Bermuda Protected Species Order. These trees are not identified in the CMP.

The CMP is also limited in scope as it does not include the full extent of the Woodland Reserve on the property. The Department of Works and Engineering has already issued an RFP for Southlands Foreshore Vegetation Management. This RFP includes work on the entire southern section of Southlands Park including the entire area of woodland reserve zoning. They request pricing for works that include replanting and include a list of native and endemic species without any direction on the specifics of the planting. This has been done prior to approval of a CMP for the area and is of grave concern. The CMP in the current application only extends to opposite the entrance to the Banyan Trees. A CMP that covers the entire Woodland Reserve should be required. There is no natural break at this point and appropriate management would include the entire woodland in the CMP.

### **Beach Safety**

We note in the drawings and Grounds in Support the proposal for “beach access restoration”, however there is a reason why Southlands beach isn’t on the list of “priority” beaches. It is not a safe swimming beach. It is frequently subject to rip currents and there are a lot of dangerous, submerged rocks. We recommend an expert safety evaluation should be conducted before we encourage more people to use this beach for their enjoyment.

### **Lack of Details for Planned Renovation of Existing Buildings**

We also note in the Grounds in Support that “on the northern part of the park, there will be arrangements for the renovation and reuse of all derelict buildings (seven of them), including the main house, which is grade 2 listed. The vision is that all the buildings will be brought back to uses that will complement the use and enjoyment of the park”.

Where are the details of this “vision”? What do they plan to use the newly renovated buildings for? How will these buildings look? Could one of these be a café and bathrooms instead of constructing a brand new building on the southern side?

We strongly support investment in our public parks, but only when it is guided by strategy, consultation and ecological responsibility. Once more, we request that nothing further happens in relation to Southlands Park until there is an approved management plan in place, one overarching planning application covering proposals for the whole park, and the National Parks Commission has been convened and given the opportunity to thoroughly review the management plan and application. 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.

This disjointed approach to developing such an exceptional area of green space, which contains unique natural and historical value, runs the risk of destroying this precious resource for current and future generations.

Thank you for considering our concerns.

Sincerely,  
Janice Hetzel