

ADDITIONAL REPRESENTATION MADE BY THE FRIENDS OF SOUTHWICK COUNTRY PARK TO THE WILTSHIRE HOUSING SITE ALLOCATION PLAN

Sir,

During the public consultation on the Schedule of Changes to Wiltshire's Housing Site Allocation Plan, we expressed our concerns that the ecology of the statutory main river, Lambrok Stream, as it runs adjacent to sites H2.4, H2.5 and H2.6 has not been properly surveyed or understood and that development at these sites would contravene Policy 50 of Wiltshire's Core Strategy and Wiltshire Housing Site Allocation Plan's Sustainability Appraisal (May 2018.)

Wiltshire has since introduced the **Trowbridge Bat Mitigation Strategy** as a supporting document; this has raised **five issues** relating to the ecology of the Lambrok that we feel should be addressed.

Contents

<u>Issue 1.</u> A Bechstein bat roost	page 1
<u>Issue 2.</u> The draft Trowbridge Bat Mitigation Strategy SPD	page 1
<u>Issue 3.</u> Settlement Boundary Changes	page 4
<u>Issue 4.</u> Latest Research	page 4
<u>Issue 5.</u> Tawny owls have returned to SCP this winter	page 4
Appendix 1 Letter from Natural England	page 5
Appendix 2 Management plan for LNR	page 6
Appendix 3 Wildlife list	page 11

Issue 1. Bechstein, Natterer's and pipistrelle bat roosts were identified in Southwick Country Park in 2016; **Wiltshire Bat Group** believes Bechstein bats are the rarest mammal in Britain.

- It is likely that Bechstein bats forage regularly at the site H2.4.
- They are known to forage in overgrown hedges and tree lines, such as those at H2.4, particularly near water, as well as deciduous woodland.
- Their diet includes midges, moths and other flying insects, grasshoppers, arthropods and crane flies, all of which will be plentiful in the unimproved, long-fallow field at H2.4.
- They return to their foraging sites year after year.

We believe that development at H2.4 will lead to irreversible losses among Southwick Country Park's roosting bat population (Bechstein, Natterer's and pipistrelle), in contravention of Policy 50 of the Wiltshire's Core Strategy.

Issue 2. The draft Trowbridge Bat Mitigation Strategy SPD was published on 21st February. There will be a 4 week public consultation that will end on 21st March. The TBMS is intended to inform the WHSAP Examination but we do not know if it will have been adopted, or how much of it will have been adopted, before the WHSAP hearings that begin on 2nd April.

[2a.] TBMS describes **three zones of bat sensitivity** and puts H2.4, H2.5 and H2.6 into a yellow zone of medium sensitivity, requiring significant mitigation from both the county and any

developer. It lists impacts on bat foraging areas and commuting routes under the following headings, only some of which are relevant to H2.4, H2.5 and H2.6:

- **Habitat degradation**
 - H2.4, H2.5, H2.6 are all important foraging areas and form part of an important commuting route. It is our opinion that development at any of these sites will cause irretrievable loss of species and habitat in contravention of Core policy 50.
 - Development at H2.6 will interfere with the bats' commuting corridor; there will be a cumulative loss of connectivity between roosts and foraging sites in contravention of the draft Trowbridge Bat Mitigation Strategy, para,196
- **Lighting**
- **Noise and vibration**
- **Recreational disturbance**
 - TBMS, in Section 9 beginning on p.50, proposes that the recreational pressure on the Green Lane, Biss, Clanger and Picket Woods be relieved by re-directing the foot traffic to Southwick Country Park, which will be developed to attract dog walkers with water features, dog training areas, enlarged car park, toilet block and cafe. The Friends of Southwick Country Park do not think the park's wildlife habitat and evolving species lists, including its bats, will survive this change; it will signal the irretrievable loss of the park's water voles and much of the Lambrok's biota in contravention of Policy 50 which states that there should be *no net loss of local biodiversity resource.*
- **Pollution**
- **Mortality**
 - Traffic collisions: the tall hedges and cluttered vegetation where the A361 crosses the Lambrok Stream lifts the bats' commuting corridor safely over the road; clearance of these tall hedges to provide safe exits onto the A361 from the sites at H2.4 and H2.5 will endanger the bats.
 - Predation: any housing development will bring more cats into the bat sensitivity yellow zone. The Bat Conservation Trust says that cat attacks are one of the most common causes of bat casualties.
 - Policy 50 requires development to *secure the integrity of local network and provision of ecosystem*

-

[2b.] TBMS Section 9's proposal that the recreational pressure on the Green Lane, Biss, Clanger and Picket Woods be relieved by re-directing the traffic to Southwick Country Park:

- **Wiltshire's lack of coherent policy:**
 - **Wiltshire's Countryside Access Improvement Plan, 2015-2025**, includes among its statutory responsibilities as laid out in the Natural Environment and Rural Communities Act 2006: *have due regard to protecting sensitive habitats and biodiversity in managing and improving access*
 - **Wiltshire's Biodiversity Action Plan** targets include: *local authorities [should]enhance biodiversity on their land holdings*
 - **A Landscape-scale Framework for Conservation in Wiltshire and Swindon (Sept 2012)** *prioritises wood-pasture, parkland and ancient trees; arable field margins and hedgerows; a perfect description of Southwick Country Park.*

- **Southwick Country Park, Nature Reserve**
 - In 2013 the Friends of Southwick Country Park (FoSCP), supported by Wiltshire Council, applied to Natural England for Local Nature Reserve (LNR) status. In 2014 NE agreed that SCP met their criteria ([see Appendix 1](#)) and that all that was required was that Wiltshire Council agree in committee and announce their decision. A development plan was drawn up ([see Appendix 2](#)). Wiltshire Council's Legal Department took the matter in hand and discovered complications that have still not been resolved. The park is therefore not protected by LNR status although it was Wiltshire Council's and Natural England's intention that it should be.
 - FoSCP and Wiltshire's Countryside Team have worked for five years, directed by the development plan, as if it were a LNR.
 - Finalising the procedure that would give Southwick Country Park the protection of LNR status needs to be resolved one way or the other.

- There is the danger that the proposed changes to Southwick Country Park in Section 9 will be adopted on the tail end of a much needed and otherwise well executed Bat Mitigation Strategy which is being rushed into effect to support the WHSAP application. The proposal in Section 9 of TBMS is a reversal of Core Policy 50 made at the recommendations of a recreational survey conducted in rural car parks among a self-selected cohort, 79% of whom were dog walkers.

Issue 3. Settlement Boundary Changes

- Neither the Schedule of changes to Wiltshire's HSAP, nor the Trowbridge Bat Mitigation Strategy explain what will happen if the proposed changes to the settlement boundaries are adopted. H2.4 and H2.5 are greenfield sites outside the Trowbridge settlement boundary and TBMS has put both in the yellow zone of bat sensitivity. The yellow zone goes right up to the present boundary of the Trowbridge settlement. If the boundary is changed so that the two sites fall inside Trowbridge settlement does this mean they will lose the protection of the yellow zone? This needs to be made clear.
- TBMS intends that the sites at H2.4, H2.5 and H2.6 all be protected by the requirements of the yellow zone; is it Wiltshire Council's intention to use the boundary changes to negate those requirements?

Issue 4. Latest Research

- There is new information about invertebrate biomass loss (Sanchez Bayo, F; Wyckhuys, KAG; *Worldwide decline of the entomofauna: A review of its drivers*; Biological Conservation, vol 232, April 2019; pp8-27) which concludes that Britain is losing invertebrate biomass to intensive agriculture and urbanisation faster than any other country that has been studied. Of British aquatic invertebrates, it is caddis fly species that are most endangered; the Lambrok is home to at least three species of caddis fly, favoured prey of Bechstein bats. Policy 50 requires that [a]ll development should seek to enhance biodiversity [and] deliver biodiversity gain; damaging the Lambrok ecosystem will not deliver biodiversity gain.

Issue 5. Tawny owls have returned to SCP this winter; their hunting ground includes the flourishing field vole colonies in the fallow field at H2.4. We believe the Lambrok's riparian habitat is drawing new species into the park. [Appendix 3 is a list](#) of recent wildlife sightings.

- FoSCP believes that Wiltshire should commit to the widening of biodiversity in line with the policies set out in their *Biodiversity Action Plan 2015*.

Appendix 1: Letter from Natural England

19th May 2014

Our ref: Southwick Park

Your ref:

sarahceg@tiscali.co.uk



Natural England
Whittington Road
Worcester
WR5 2LQ

T 07595 647709
F

Dear Sarah Gregory,

PROPOSAL TO DECLARE SOUTHWICK PARK AS A LOCAL NATURE RESERVE

I am writing regarding the proposal to declare Southwick Park a Local Nature Reserve (LNR) under the National Parks and access to the Countryside Act 1949 (as amended).

Natural England's purpose is to conserve and enhance the natural environment for its intrinsic value, the wellbeing and enjoyment of people and the economic prosperity that it brings. Southwick Park, managed according to the management plan is of value to both local wildlife and the local community. As such, Natural England is delighted to support the declaration of the site as a LNR. Protecting this site and its habitats will allow it to continue to be used and valued by local people for recreation and enjoyment of the natural environment.

Thank you for showing me around the site.

Natural England confirms that it has been consulted on your proposal to declare Southwick Park a nature reserve under the provisions of Sections 19 and 21 of the National Parks and Access to the Countryside Act 1949 (as amended). The requirements for consultation contained in Section 21(6) of that Act have therefore been met. As Adviser for the Landscape, Licencing and Biodiversity Team, I would like to formally welcome these proposals on behalf of Natural England.

The next step is for Wiltshire Council to make the necessary arrangements for the formal declaration of the reserve. This can be limited to the issuing of public notices or can be extended to include an event to celebrate the declaration.

Once the declaration is complete, we will need confirmation of the declaration date, a copy of the declaration papers and a boundary map of the declared area. The site will also be promoted through Natural England's internet site finder.

If you are unsure about any part of the declaration process, please refer to the guidance booklet from our website (<http://publications.naturalengland.org.uk/publication/31039?category=15005>) or contact me using the details below.

Yours sincerely

Tabatha Leigh-Perry
Landscape, Licencing and Biodiversity Team – South Mercia
tabatha.leigh-perry@naturalengland.org.uk

Appendix 2: Nature Reserve draft management plan.

SCP Draft Management Plan 8/1/14 SG

Local Nature Reserve is a statutory designation under S 21 of the National Parks and Access to the Countryside Act 1949. A local nature reserve is declared by a local authority e.g. Wiltshire County Council and approved by Natural England. This is an outline management plan for the Southwick Park Management Committee meeting January 2014 and discussion with Natural England. It is based on recommendations for such outlines from Natural England.

OUTLINE MANAGEMENT PLAN FOR SOUTHWICK COUNTRY PARK

1 VISION STATEMENT

In five years time visitors to the Park continue to arrive on foot, bicycle or by car with easy access and parking. Clear signs, information about the Park and contact details for the Friends greet them on the notice boards. From the many well maintained paths they notice colourful areas of uncut meadow buzzing with insects and butterflies alongside copses of new planting, wide uncut field verges, streams and ponds full of life with wide protected banks and a new community orchard. They enjoy the historic farmland landscape famous for its mature oaks and old hedgerows and now managed for a diversity of wildlife unexpected so near Trowbridge town. They see many other visitors engaged in a range of activities such as pond dipping for school classes, wheelchair users taking a walk, families picnicking and a tree-climbing event. Visitors may also become Friends, attend events such as Owl Prowls on summer evenings, help in the Working Party clearing the waterways and access up to date surveys of the wildlife online or through the Newsletter.

2 SITE DETAILS AND ASSESSMENT

Name: Southwick Country Park *or Southwick Nature Reserve*

Grid reference: 842560

Size: 153 acres including land leased to Hope Nature Centre

Ownership and management: Southwick Country Park is owned by Wiltshire County Council. It comprises Southwick Farm which was purchased by West Wiltshire District Council in 1989. *Site map attached.* The whole Park (excluding Hope Nature Centre) is managed by a joint Management Group (officers and councillors from Wiltshire County Council) and Friends who are volunteers but represent other organisations such as the Parish Council, the Park Run and Butterfly Conservation.

Legal restrictions *to be added*

Geology: The whole Park lies on Oxford Clay . It is generally low lying and drains via small streams to the Lambrok.

Ecology: detailed lists of the flora and fauna are now available (Appendix 1). The ecology of the Park is similar to that of the farmland around. However there are significant differences:

- The Park already contains more varied habitats than the farmland around. For instance the meadows are rich in species of flora such as buttercups and sorrel.
- Local Nature Reserves close by support some rare and protected species such as Bechstein Bats and White Admiral butterflies in Green Lane woods. It is likely that some of these species may already be in the Park or may colonise it.
- The meadows have been mowed for twenty five years and are gradually becoming impoverished with a consequent increase in wild flower species and a possible increase in diversity of insects
- In 1996 22 additional acres of woodland were planted which provide other habitats for wildlife.
- On going projects increase diversity e.g. the recent re-homing of about 300 slow-worms from a development site .

Current maintenance

Routine maintenance is supplied by:

- i) Wiltshire Council Countryside Service manages a contract including basic maintenance
- ii) There is a twice monthly working party of volunteers and Council officers
- iii) The fields are leased to a farmer for hay and are mowed twice each year

WWF additional volunteer help????

3 THE LOCAL CONTEXT

Southwick Country Park is on the edge of Trowbridge and provides a buffer between Trowbridge residential areas and Southwick village. On the northwest the Park is close to the designated greenbelt between Trowbridge and Bradford on Avon while on the south-east farmland separates it from North Bradley village, the designated residential expansion of Trowbridge and important ecological sites such as Green Lane also a Nature Reserve (Map attached). The Park provides opportunities for corridors for the migration of birds, bats and insects between areas of rich wildlife.

The following are extracts from the Wiltshire Core Strategy P 30:

“It is recognised that the villages surrounding Trowbridge, particularly Hilperton, Southwick, North Bradley and West Ashton have separate and distinct identities as villages. Open countryside should be maintained to protect the character and identity of these villages as separate communities. The local communities may wish to consider this matter in more detail in any future community – led neighbourhood planning.”

“Any development in Trowbridge should be sensitive to constraints, such as the local Country Wildlife Sites,SSSI’s, Ancient Woodlands, the West Wiltshire Green Belt and areas at risk of flooding. “

The NHS Community Area of Trowbridge has a population of 40,169 and contains some of the most deprived districts of Wiltshire. For instance 24.6% of the population smoke as compared with 20.2% for Wiltshire. One in four children is obese or overweight and in terms of teenage pregnancies it ranks 17th out of 18 Community Areas. (Trowbridge Community Area Joint Strategic Needs Assessment produced by NHS Wiltshire and Wiltshire County Council in

February 2010) Physical activity is crucial to well-being and Southwick Country Park offers opportunities accessible to the whole Area.

4 CURRENT USE

A survey of 157 users of the Park on Saturday June 29 2013 showed that half were dog walkers (54%) and 33% were runners in the Fun Run. Despite having these activities, 75% of all respondents said that wildlife was the most important characteristic of the Park. Most respondents had travelled less than 15 minutes to the Park and most spent less than one hour there. It is therefore a local facility though usage must vary by time and day of the week and season.

Hope Nature Centre which leases about 12 acres from Wiltshire County Council , provides a café, toilets and small animal park during its opening hours. (Appendix 2)

Since 2000 one field is used by Southwick Allotment Association for an open allotment area.

Organisations making occasional use of the Park include the Park Run, a NHS/WCC Well Being Group and the Woodland Trust.

There is now no agricultural activity on site except that the hay crop is leased to a farmer who mows once a year in June or July.

5 ACCESS

Southwick Country Park has its own car park on Frome Road with space for 50-60 cars. It is also possible to park on the roadside. Hope Nature Centre has additional parking reserved for Centre users.

The main circular path in the Park is gravelled and suitable for wheel chair users. Other footpaths give access from Southwick village and Studley Green (SWCK53 – see map attached). All parts of the Park can be reached by paths though some are simply mown.

According to the survey June 2013, nearly all visitors always feel safe in the Park.

6 INTERPRETATION, EDUCATION AND OTHER ACTIVITIES

The Management Group organises educational activities in the summer. In 2013 these included:

Bug Day – organised activities to look at insect life – a collaboration with Bristol Zoo and Oxford University Natural History Museum

Bat Walk and Moth trapping – these evening walks were so popular more had to be organised

Owl prowl

Planting trees in National Tree week

Butterfly walk

In other years craft workshops linked to local wildlife have also been popular.

The Management Committee organises publicity. For instance events are publicised to the public including schools in Wiltshire County Council leaflets, local newspapers and on notice boards. *on the web???* Links with local schools have included talks to Broadmead School and training in social survey for six formers from St Laurence comprehensive school who also helped with the survey. The Management Committee also has its own Newsletter (see Appendix).

A Park Run (including a Junior run)is organised at weekends and is popular.

7 METHODS AND ACTION PLAN

The vision described in Section 1 gives us the Joint Management Group’s objectives for the next three years 2014-6 :

- i) continue to **conserve those farmland habitats which are rich in wildlife.** These include the mixed hedgerows some dating back to 1886 and the old oak trees.
- ii) continue **to record the wildlife** in the Park and to use knowledge and experience here and elsewhere **to support and increase diversity**
- iii) retain **open access** to most parts of the Park and to look at ways that existing and new activity can be managed within a Nature Reserve
- iv) **increase the number of users and widen participation** especially among young people and disabled people. Explore ways of widening the use of the Park as a resource for education. Encourage more use by residents of Studley Green, a residential area adjacent to the Park
- v) **continue to provide information** about the Park as publicity, newspaper articles, maps , the Newsletter and a website.

MANAGEMENT PLAN

Objective	Activity and timescale	Responsibilities and resources
i) conserve the farmland habitats	Continue the routine regular management of the field hedges, trees and verges See Appendix – Ian’s report Nov 13	Existing working party
ii) support and increase the diversity of wildlife	Continue wildlife recording and management initiatives to encourage wildlife 2014: i)use our records to renegotiate the mowing contract for a diversity of flora in the meadows and for insects. Also to leave wide bank verges to the Lambrok and other waterways and vary the month of mowing in different fields	JMG JMG and Wiltshire County Council

	<p>ii) Explore the feasibility of encouraging specific species (e.g we already provide for bats and owls) and prepare fundraising applications for specific projects.</p> <p>iii) Planting of community orchard already planned in March and November</p> <p>2015: i) implement projects to encourage specific species.</p> <p>ii) Intensive management of new orchard.</p> <p>iii) Survey of waterways in Park and funding applications for necessary action outside normal maintenance</p> <p>2016 Improvement of streams and ponds for wildlife</p>	<p>JMG and Wiltshire Wildlife Trust</p> <p>Wiltshire County Council funded</p>
iii) retain open access – possible zoning of activities	<p>2014 prior to renegotiating the mowing contract explore the feasibility of keeping some parts of the meadows fenced and/or dog free. Produce a costed proposal for permanent zoning (eg a fenced off field) and / or new mowing regime.</p> <p>2015 implement any agreed zoning</p>	JMG
iv) increase users and widen participation	<p>2014 i) continue a dialogue with the local primary schools and give support for projects based on the Park</p> <p>ii) continue existing educational activities and add new ones</p> <p>continue to promote the Park in a wide area</p> <p>iii) Start to make contacts with disabled groups to make them aware of and help them use the Park</p> <p>iv) make a link with Studley Green residents association</p> <p>2015 i) widen the Friends Group and make more formal and informal links with other organisations</p> <p>ii) continue any projects with schools</p>	JMG
v) continue to provide information and publicity	<p>2014 continue to inform people about the Park and to publicise its use. Explore what use might be made of a website dedicated to the Park</p>	JMG

Appendix 3 Recent wildlife sightings:

- **at Lambrok Stream:**
 - otter (as far up as Southwick village)
 - kingfisher
 - water vole (evidenced by Countryside Officer Alison Rasey)

 - **in the field at H2.4**
 - roe deer
 - muntjac
 - barn owl
 - tawny owl
 - kestrel
 - rabbit
 - fox
 - badger
 - field vole colonies

 - **Other observations**
 - We hope to find evidence this summer that the scarce chaser dragonfly is breeding in the park.
 - We think the kingfisher may nest in or near the park.
-