

The Friends of Southwick Country Park

Objections to Trowbridge Bat Mitigation Strategy Section 9 (page 50) Off-site and Strategic Mitigation

9.2 Recreational Pressure Mitigation

- Para 210; Footprint Ecology Report. **Wiltshire's Biodiversity Action Plan** requires *local authorities [to] enhance biodiversity on their land holdings*; the proposals in Section 9 would represent a change to this policy that we believe should not be driven by a **recreational survey**.
 - The proposals have been drawn from a survey among a self-selected cohort of walkers interviewed in rural car parks;
 - 79% of the respondents were dog owners as opposed to 46% of Wiltshire's wider population;
 - of the 22 questions asked, only one, very tangentially, pertained to **ecology or biodiversity**.
- Trowbridge Recreational Strategy and Visitor Survey in section 6.3 says: *"The overarching aim of our recommendations is to ensure new housing does not lead to adverse effects on the Bath and Bradford on Avon Bats SAC through urban effects on the woodlands, including recreation impacts."*
 - This requirement cannot be met by recommending recreational pressure be moved to Southwick Country Park when there is so much evidence that this is an important part of the wider habitat of the bats from the **Bradford on Avon SAC**.
- Para 213 We believe the creation of a new SANG (Suitable Alternative Natural Greenspace) would be preferable to the relocation of recreational pressure to Southwick Country Park. Policy 50 of Wiltshire's Core Strategy requires *appropriate measure(s) to avoid and reduce disturbance of sensitive wildlife species and habitats* which we do not think could be achieved in SCP if these proposals are put into effect.
- Para 196. We believe that additional recreational pressure on Southwick Country Park will produce a *significant impact due to cumulative loss of foraging habitat and connectivity for bats*; something the TBMS specifically warns against in para 196.

9.2.1 Recognising important bat woodlands as nature reserves

- The Trowbridge Recreational Strategy and Visitor Survey, in section 6.5, recommends that Wiltshire *[e]nsure woods (i.e. bat sites) are recognised as nature reserves by visitors and that these are different from the other open spaces which are primarily managed for access*.
 - In the spring of 2014, the Friends of Southwick Country Park, with the required permission of the landowners (Wiltshire Council), proposed to Natural England that Southwick Country Park be declared a Local Nature Reserve. A joint **Management Plan** was drawn up ([Appendix 2](#)). Natural England agreed ([Appendix 1](#)) that the criteria had

been met. Natural England “**formally welcomed**” the proposal and laid out for the county the steps necessary to complete the process.

All that was required at that stage seems to have been a declaration from Wiltshire Council that as from a certain date, Southwick Country Park would be a Local Nature Reserve. Informing Natural England of that date would have completed the process. The process was not completed for legal reasons that have not been made clear to us.

- SCP therefore does not appear to have Nature Reserve status to protect it and is not considered “***different from other open spaces***” and the county now proposes that it be “***primarily managed for access***” despite the fact that it has been managed as a nature reserve for the past five years as agreed with Natural England and laid out in the Management Plan.
- Five years ago, the Southwick Country Park met Natural England’s standards for a nature reserve and the proposal that it be declared a Local Nature Reserve was formally welcomed. In the years since, SCP has been improved as wildlife habitat in accordance with the Management Plan. Its species lists (which can be seen at **southwickcountrypark.com**) have grown, protected species have been identified as both visitors and residents, its population of invertebrates has brought nine species of bat to forage there;
 - Bechstein bats,
 - greater horseshoe bats,
 - Natterer bats,
 - pipistrelle,
 - soprano pipistrelle,
 - Nathusius pipistrelle,
 - Daubenton’s bat,
 - serotine bat,
 - brown long-eared bat.
- The Wiltshire Core Strategy (6.72 on page 261) says: ***However, statutory protection will only ever apply to those sites which have been formally notified by Natural England.***
 - We have written to Natural England to ask them to differentiate between **formally welcomed** and **formally notified**. We do not yet have their reply.

9.2.2 Infrastructure enhancements to other greenspace sites

- FoSCP believes that this proposal is recommending:
 - the protection of the roosting sites of a rare species of bat in the woods to the east of Trowbridge by degrading its alternative roosting sites and its feeding grounds in Southwick Country Park. It appears not to take into account:
 - a Bechstein bat roost was found in SCP in 2016; Bechsteins (*Myotis bechsteinii*) are listed in Annex II of the EC Habitats Directive;

- Bechstein bats come from the Green Lane Wood roost, using the Lambrok as a green corridor, to feed in the park on the insects that breed in the park's stream and ponds;
 - the park has been identified as an important foraging site for bats and the Lambrok as an important commuting corridor;
 - pipistrelle and Natterer roosts have also been found;
 - nine species of bats (see above) have been identified in the park;
 - increased bat activity last summer has suggested a change in behaviour yet to be assessed by the Wiltshire Bat Group;
- increased recreational pressure at SCP, which we believe will be detrimental to the park's bats, their foraging sites and the commuting corridor that follows the Lambrok Stream;
- the preservation of the habitat of one rare and protected species at the cost of the habitat of other rare and protected species in contravention of **Core Strategy, Policy 50** which requires ***no net loss of the local biodiversity resource*** and ***the integrity of local ecological networks and provision of ecosystem services***. SCP's ecological network includes:
 - **water vole** (*Arvicola amphibius*) - a priority conservation species protected under Schedule 5 of the Wildlife and Countryside Act 1981;
 - **scarce chaser dragonfly** (*Libellula fulva*) - listed in Category 3 in the British Red Data Book for Invertebrates; the scarce chaser is a qualifying feature under the dragonfly criteria outlined in the Guidelines for the **Selection of Biological Sites of Special Scientific Interest (SSSI)**;
Steve Covey, Wiltshire recorder for Dragonflies and Damselflies, writes about the Scarce Chaser in a mail dated 16.10.2018: *Bradford on Avon and Melksham is the primary site for this species in Wiltshire. I suspect the park is used as a maturation site for L. fulva which then moves back down to the Avon to breed. [Lose] these watercourses and maybe reduce the number of maturation sites this species might have available...;*
 - **opposite-leaved pond weed** (*Groenlandia densa*) - listed as vulnerable in both the IUCN's Red List and in the British Red Data Book for vascular plants;
 - **bullhead** (*Cottus Gobio*) a reportable species in Wiltshire; The River Avon Special Area of Conservation requires the monitoring of local populations of Bullheads;
 - **eight species of Odonata** (dragonfly and damselfly), were identified in the summer of 2018;
 - **three species of caddis fly**, the most seriously endangered of Britain's invertebrates.
 - Southwick Country Park's full species lists can be found on the website **southwickcountrypark.com**.
- We believe that Wiltshire Council, in section 9 of the TBMS, is attempting to solve a planning conundrum with solutions that run counter to legislation and directives at international, national and local levels.
 - If Southwick Country Park is developed as suggested in section 9 of the TBMS, there will be irreversible loss of protected species in contravention of European Directive 2001/42/EC which requires: ***Protect and enhance all biodiversity and geological features and avoid irreversible losses.***

- Wiltshire's 2015-2025 Countryside Access Improvement Plan's (CAIP) statutory responsibilities include *have due regard to protecting sensitive habitats and biodiversity in managing and improving access (Natural Environment and Rural Communities Act 2006)*
- Wiltshire has not yet surveyed or assessed the ecology of Southwick Country Park despite evidence that the improving habitat ([Management Plan 2014, Appendix 2](#)) has been drawing in new species. Wiltshire's Biodiversity Action Plan requires *baseline information on our current knowledge* and *a framework for monitoring* in order *[t]o prioritise action required to conserve Wiltshire's biodiversity*. This has not been done and the TBMS proposes that the above infrastructure changes be made before the value of what will be lost has even been assessed.
- It is the opinion of the Friends of South Country Park and the Countryside Team that the recreational pressure on SCP is already at a maximum if its biota and habitat is not to be damaged. The Lambrok Stream and its growing biota, the woods and meadows, the marshy patches that are returning to Lambrok Meadow, the undergrowth and thicket that protect bird nests will all suffer from the added footfall and the increased presence of off-lead dogs.

Alternatives

- Suitable Alternative Natural Greenspace (SANG).
 - Creating a dog park elsewhere will allow us at Southwick Country Park to limit dog activity and build up an important area of conservation central to the Lambrok corridor and its ecology. Wiltshire Wildlife's Water Team has approached FoSCP with an offer of help with our development of Lambrok Stream ([Appendix 3](#)) as part of their plan for work in the Biss catchment area.
 - Hilperton gap is easily accessible by local footpaths and widely used by dog walkers. Parking and facilities for dogs would quickly attract recreational walkers.
- Countryside Access Network (CAN)
 - There are over 6,000 kilometres of rights of way in Wiltshire, which is the 3rd largest network of England's counties. The 2015-2025 Countryside Access Improvement Plan's Strategic Objective 17 is *to improve sustainable access to Wiltshire's countryside and provide a more useable public rights of way network*.
 - There are 7.8km of public footpaths in the quadrangle bounded by the A361, Trowbridge's settlement border in the north, Bradley Road and Southwick village in the east and south. This is an area of little more than 1km² just over the road from Southwick Country Park. These 7.8 km of footpaths are minimally signposted from the road; there are no destination signposts at all; inside the quadrangle there are no obvious waysigns; there is little to no car parking. Improved access, signage and parking will encourage walkers away from the nature reserves.

Boundary Changes

Page 36 Figure 4 Trowbridge Bat Mitigation Strategy – Bat Habitat Sensitivity Zones

- The yellow zone runs up to the Trowbridge settlement boundary and at present includes H2.4 and H2.5; if the boundary is moved, as is proposed in the schedule of changes, and these two sites fall into the Trowbridge settlement area, will they lose the protection of the yellow zone? The present settlement area is not included in the zones of sensitivity.
- It is the intention of the experts who have drawn up the TBMS that both these sites come under the protection of the yellow zone; the Schedule of Changes to WHSAP, at present before the Secretary of State's Inspector, must not be used to evade that responsibility.

Suzanne Humphries (Secretary FoSCP)
20th March 2019

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Appendix 1 Letter from Natural England

19th May 2014

Our ref: Southwick Park

Your ref:



sarahceg@tiscali.co.uk

Natural England
Whittington Road
Worcester
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T 07595 647709
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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

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Appendix 2

Southwick 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 Lambrook.

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 Lambrook and other waterways and vary the month of mowing in different fields	JMG JMG and Wiltshire County Council

Appendix 3

Mail from Wiltshire Wildlife Water Team

Abigail Leach <AbigailL@wiltshirewildlife.org>
Thu 07/03/2019 13:37

Good Afternoon,

I am a project officer with the Water Team at Wiltshire Wildlife Trust, we have just been awarded some money from the Bristol Avon Catchment Partnership fund to carry out some work on the Biss and its tributaries in and around Trowbridge, including the Lambrok Stream. Over the course of the summer this year we hope to gauge the current status of the rivers and run a number of events to help local communities get more engaged with looking after their rivers.

We are aware of the great work the Friends of Southwick Country Park are doing and it would be great if we could set up a time to come and meet with you to talk to you about this project. Are there any times in the coming weeks that would be good for you?

Kind Regards,

Abigail

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