

Sir,

Re: Wiltshire Housing Site Allocation Plan Hearing on 04/04/2019

The Friends of Southwick Country Park are new to the intricacies of planning submissions and we missed the SOCG and illustrative plan for the Land at Upper Studley, Trowbridge (Policy H2, Site Allocation H2.5) that you submitted for Newland Homes on 30/03 2019. We were therefore unprepared at the WHSAP hearing on Thursday 04/04/2019 when you presented Newlands Homes' proposals and we were unable to make a considered reply.

We would like, though, to point out the following:

- The Lambrok Stream's ecology must be considered as a single unit. The National Planning Policy Framework (February 2019) requires in para 174 (a) that plans should:
  - *Identify, map and safeguard components of local **wildlife-rich habitats** and **wider ecological networks**, including the hierarchy of international, national and locally designated sites of importance for biodiversity; **wildlife corridors** and stepping stones that connect them; and areas identified by national and **local partnerships for habitat management, enhancement, restoration or creation**; (our emphases)*
- Southwick Country Park is a **wildlife-rich habitat**, which includes species protected under the Wildlife and Countryside Act 1981, species listed in category 3 of the British Red Data Books, and the International Union for Conservation of Nature's Red List. It cannot be assumed that the park's ecology stops at its boundaries. While Wiltshire has not yet conducted an ecological appraisal of the Lambrok Stream, we believe that these species also exist upstream of the park constituting a **wider ecological network**.
- It is almost certain that water voles live in the Lambrok at the foot of site H2.5; clearing the stream and its banks will disturb the water voles' habitat and constitute an offence under the Wildlife and Countryside Act 1981. We would like to point out that the British Wildlife Society has recommended, in the light of new research, that the mitigation requirements for water voles be re-written.
- The illustrative plan published on 30/03 2019 shows a paved path within a couple of metres and a road, at one point, within 5m of Lambrok Stream. The run-off from both will need extensive buffering that cannot be met by the areas of *public open space* and *natural play* that run right up to a narrow strip of planting on the stream's banks.

- The site is steep and the surface drainage will require a great deal of mitigation that we do not think will be met by the attenuation pond in this plan.
- Wiltshire Wildlife Trust's Water Team has approached the Friends of Southwick Country Park to offer assistance in our assessment of the whole of Lambrok Stream. We are meeting with a representative on 12<sup>th</sup> April and will include you in any significant findings.

We have copied this letter to the WHSAP programme Officer, Mr Ian Kemp, with the request that, if it is possible within the framework of the examination's rules, it be included with our written representations to the Examination.

Suzanne Humphries (Sec.FoSCP)