

Planning Officer's Report - LDCA 24TH NOVEMBER 2021

APPLICATION

2021/90 – Proposed Development of a Satellite Earth Station Facility, Horse Point Plain, Bottom Woods

This is an addendum to the main report considering additional stakeholder response and a representation to the development proposal that has been received follow publication of the main report.

Saint Helena National Trust in its response has raised number issues in respect of the importance of ecology and the natural environment of the application site. Whilst it does not actually indicate objection to the proposed development on this site of the Nature Reserve, however the underlying emphasis is one of objection. SHNT has been engaged with much of the survey work that has been undertaken in the assessment of the application site. The issues raised by the Trust are summarised as:

- approach adopted for the EIA Report is well-considered and is content with the majority of risks and impacts identified and have been assessed fairly, and
- proposed mitigation and enhancement measures are generally adequate

The representation raises six area of concern as set out below:

Invertebrates not fully considered:

- twenty-six endemic invertebrate species and additional 33 species that are possibly endemic, been recorded as baseline ecological assessment of which 35 endemic species have previously been records as linked to the site
- with high levels of endemism, it considers that Horse Point site to be of global importance for invertebrates and many endemic species are protected by the *EPO 2016*;
- proposed development can cause extinction of a newly found, undescribed species such as fungus weevil was recorded that we suspected is new to science and under the *EPO 2016* new species are automatically protected;
- limitations in the baseline ecological assessment that should be broadened;
- acknowledgement lack of suitable land to locate the proposed development;
- stress high importance of conducting further research on the fungus weevil through expert identification and DNA analysis followed by further surveys to determine distribution;
- report recommends mitigations for invertebrates - “conducting search, rescue and translocation operation of endemic invertebrates immediately prior to construction starting”;
- translocations have a poor history of success;
- little known of the individual ecology of the species concerned;
- knowledge of the endemic species is based on assumption;
- not been found before on samphire elsewhere is significant – it is a common plant on the island that has been sampled/studied for its invertebrates since the 19th century but the fungus weevil not found, which implies that something in its requirements is unusual and not present in other areas of samphire.

Dryland habitat not fully considered:

- unpromising-looking drylands support high diversity of endemic invertebrates, important microhabitats are firm but friable soils and sediments, detritivores and predatory species burrow and embedded rocks provide refuge for other species, dry leaf litter also important;
- dryland/desert biodiversity, 'crust' of drought-tolerant organisms: tiny lichens, mosses and various microorganisms (fungi and algae) stabilise surface and are probably extremely important to the invertebrates that inhabit desert ecosystems;
- incredibly vulnerable to disturbance and once broken can no longer prevent erosion by wind and can take decades (sometimes centuries) to re-establish, though they can sometimes establish more quickly in some circumstances);
- dryland/dryland habitats can be incredibly slow to recover from disturbance;
- Pseudo scorpions - components of the crust fauna – St Helena dryland endemics not included in the ecological survey as there is no ally accessible identification material;
- endemic darkling beetles may also be associated with such a crust, and it's habitat would be likely to lead to endemism in the mite and psocid fauna;
- two other groups in St Helena has been shown to have a lot of endemics but not included in the EIA;
- what looks barren and boring is actually crucial habitat;
- removal of the invasive vegetation needs to be done sympathetically and not to over-disturb the sediment
- some invasive species provide important leaf litter for endemics;
- recommend no go areas and strict rules on how operations and construction is conducted.

Offsetting significant environmental impacts:

- proposed development will cause significant environmental impact;
- Horse Point is an important site for wirebirds, invertebrates and dryland habitat;
- if decision makers are willing to accept the risks and impacts presented in the EIA, it is recommend that a funding settlement and mitigation restoration for the displacement of wirebirds, invertebrates and dryland habitat;
- recommend compensatory works of at least 1.5 times the land take value, using the airport development and its Landscape and Ecological Mitigation Programme as a precedent;
- Trust does not wish to extend the Millennium Forest to Horse Point using tall vegetation (i.e. gumwood, scrubwood, ebony etc.) instead using low growing endemic vegetation (i.e. boneseed, samphire) for invertebrate and wirebird conservation.

Development inside protected area:

- The proposed development is in the Millennium Forest Nature Reserve, which is protected as an ecologically sensitive area;
- over time development is 'chip away' at the edges of the protected areas;
- what is the value of the protected areas – not content to continually lose protected areas to developments and when does it stop;
- encourage greater willingness from SHG to restrict impactful developments in protected areas.

Lack of clarity on site selection

- lack of clarity in why Horse Point was chosen and assessment scores against election criteria are not provided within the EIA;
- other alternative location with lesser environmental impacts;
- why does a site earmarked for residential development rule it out completely for this project;
- requirement for repeating the EIA as an alternative site is not a reason for site selection.

Lack of consideration for cultural heritage

- Cultural heritage has had only a cursory mention in the EIA Report;
- St Helena Museum Director has been referenced *pers comm* as saying no significant cultural heritage exists - cultural heritage has not been fully considered. We recommend that wider research or consultation involving the community is carried out.

OFFICER ASSESSMENT

The issues raised by SHNT are significant and the value and importance of the area for its environment and ecology is a concern. However, the balance here is whether this environmentally important area that is open to the public and vehicles without any restriction provides good conservation management against the opportunity in the future, post development, to be able to create enhanced conservation condition that can also provide increased conservation value and a better condition for the endemic plants and invertebrates to flourish. The mitigation measures identified can also reduce the adverse impact arising from the development.

Similarly there is need to balance economic and social development opportunities against the adverse environmental impact. As the EIA report states that there are also opportunities to enhance conservation value of the area through the development process as the applicant has indicated that it will invest in the conservation and enhancement of the area.

There are other sites and location that have been considered as potential sites for the location of this development, however, those sites also number of environmental constraint and accessibility issues. Similarly they may also raise number of issues once detailed assessment of these sites have undertaken.

REPRESENTATION

Representation has been received from Mr Pearce raising objection to the proposed development. The issues raised are summarised below:

- most difficult site in terms of environmental sensitivity and planning policy has been pursued;
- inexplicable decision which could jeopardise future economic potential of satellite earth stations in St Helena;
- EIA report has failed to assess the LDCP policies identified in the CPO's Scoping Opinion in the respect of the site;
- no consistent assessment of alternative sites have been made against LDCP policies;
- Coastal Zone policies CZ1 and CZ5 would not permit such development in this location as this is commercial development that is not considered to be essential infrastructure;

- Telecommunication policies TX1 and TX3 do not support such development in the national Conservation Area as it is materially damaging to the character of the area and protection of the landscape, ecology shall take precedence.
- proposed telecommunications equipment will completely change the character of this National Conservation Area the application should not be permitted under TX.3 and TX.1 (b);
- under policy NH2, development cannot be described as assisting in the conservation and appreciation of the natural assets and ecosystems;
- there is no explanation in the application or EIA as to why it should be treated as an exception and neither is there anything provided to 'justify a departure from the Plan' in accordance with Section 15 of the Land Planning & Development Control Ordinance 2013;
- material planning considerations include environmental, social and economic considerations, some argument for economic benefit can be made for all development applications and in this case the economic arguments appear to loom large for example in relation to reducing internet costs;
- hindering of economic development should also be considered - Horse Point is a beauty spot and established tour destination, its approach, ambience and amenity will be severely detrimentally impacted upon by the proposed development, affecting the whole Island tourism product, this also includes social consideration;
- contains no specific data that demonstrates there will be economic benefit to the island over and above any of the other alternative sites - if economic development is to override LDCP policies then there is no factual case for economic benefit submitted in this application;
- EIA refer to 10 Year Plan and the National Goal, Altogether Wealthier, omitted is in any reference to Altogether Greener - . 'the preservation of our land, wildlife, marine and built heritage, but also how we can advance in terms of renewable power and utilising technology to deliver improved green social economic outcomes';
- Altogether Greener implies the technological developments such as the earth station needs to be designed to work within the framework of the Island's natural heritage and the goals are spelt out as the purpose of the LDCP as, "the Plan's declared vision for St Helena of: sustainable growth in its economy; improved social, living and cultural facilities; and steadfast protection of its environment";
- coordination between the applicant and the planning system appears not to have occurred for the benefit of the island which therefore is also against the National Goal of Altogether Greener, therefore the application does not fulfil the goals of the 10-Year Plan;
- EIA lists alternative sites and lists access to fibre and electricity a key disadvantages and no explanation is given as to the problem - is it physically impossible or too expensive;
- British Government has just invested £500 million into OneWeb and thousands of miles of undersea cable has just been laid and is there no money for a few hundred yards of extra cable, the reason given to not use those two sites and to build in a National Conservation Area instead;
- EIA and rationale fails to be convincing;
- EIA does not point out that other sites are in the Intermediate Zone, neither are they in National Conservation Areas and pursuing these sites would not entail such environmental constraints as at Horse Point.
- Bradley's Camp also considered key site, EIA states it is not useable because it is a temporary quarantine station, although located in the Coastal Zone it is not National Conservation Area;

- EIA does not explain site was converted into quarantine station at about the same time potential satellite station sites were being explored - converted without development permission.
- development would appear to have contravened LDCP policy TX.1 (c) that, 'Development permission will not be granted for development which would preclude or prejudice the installation and operation of such equipment on optimum sites';
- seem to have been some home goals in the process to achieve a satellite station - Horse Point and the pleasure it gives to islanders and visitors alike should not be sacrificed for others' mistakes.
- during public consultation period the Planning Officer said he expects that if this site is given the go-ahead he expects several of the other sites will be used as well. If that is the case then there is nothing wrong with the other sites;
- why is the most environmentally sensitive site being pushed to the fore?
- information provided by the applicant is basic and insufficient to properly assess the physical and visual effects on the site and its surrounding;
- three of the 22 domes will be fifty feet in diameter, as high as the main tower on St James Church - not clear from the application drawings - three domes in themselves will have a greater impact on the landscape than the others put together;
- will sit up high upon the saddle which is the site.
- applicant not produced basic sectional drawings, elevations or 3D graphics to proudly show how their project will affect this beauty spot?
- OneWeb claims to be an environmentally friendly company in space, does this British Government funded company realise that through this application it is appearing to be environmentally destructive on Earth;
- many opportunities for satellite earth stations in St Helena are tremendous and they need to be pursued but not on this site.

OFFICER ASSESSMENT

Many of the issues raised in the representation question the assessment of the proposal against the LDCP policies and its impact on the National Conservation Area. The EIA report is a Risk Based Assessment of the proposed development and assessment concentrates on the potential impact of the development on occurrence, consequences and mitigation proposed. Whilst it would assist in the officer's assessment if the EIA also considers the policy implication and who the development is supported by policy. However, this assessment has been undertaken by the officers in the assessment of the development.

There is no doubt of the adverse impact of the proposed development on the designated National Conservation Area for the Millennium Forest Nature Reserve. There are other potential sites identified, as all sites some form of constraint. Whilst this may be first site to come forward for such development, any future proposal on other sites will also be rigorously assessed in the preparation of the EIA.

There is adverse impact arising from the development and the mitigation that has been considered will reduce some the impact, and similarly there are economic benefits that would assist in boosting economy of the Island. There is also an environmental benefit post construction that could assist in the enhancement of the conservation value of this area and secure long-term benefits.