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Copy No:

No: 31/2020

Memorandum for Executive Council

SUBJECT

Development Application: Renewal of Development Permission 2012/66 and 2015/119 (SHELCO) at Broad Bottom

Memorandum by Chief Secretary

ADVICE SOUGHT

1. **Executive Council is asked to consider and advise whether FULL Development Permission be granted to SHELCO under Development Application references 2012/66 and 2015/119 with Conditions, for a 70 Suite Eco-Luxury Hotel, 18 Garden Suites, a 30 Bed Staff Accommodation Building, 165 Leisure-related residences, a Golf Clubhouse, a Lookout Interpretation Centre, a Sebastapol Centre, Golf Maintenance Facilities and a Golf Course at Broad Bottom should be renewed as recommended by the Land Development Control Authority (LDCA).**

BACKGROUND & CONSIDERATIONS

2. At the Land Development Control Authority meeting held on 15 January 2020, it was recommended that FULL Development Permission with Conditions be granted to SHELCO under Development Application references 2012/66 and 2015/119 with Conditions, for a 70 Suite Eco-Luxury Hotel, 18 Garden Suites, a 30 Bed Staff Accommodation Building, 165 Leisure-related residences, a Golf Clubhouse, a Lookout Interpretation Centre, a Sebastapol Centre, Golf Maintenance Facilities and a Golf Course at Broad Bottom as set out in Section D of the report in Annex A and the Decision Letter in Annex B should be development permission be renewed.
3. In accordance with the directions issued by the Governor in Council to the Chief Planning Officer on 14 April 2014 under Section 23(1) of the Land Planning and Development Control (LPDC) Ordinance, 2013, the Chief Planning Officer is required to refer to the Governor-in-Council all applications for the Development of a site (or group of two or more sites in same vicinity) which exceeds (or exceeds in aggregate) five acres in area (Section 1).
4. A copy of the directions is attached at Annex C for easy reference.

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5. Section 17 (a) of the LPDC Ordinance reads:

A grant of Development Permission may be of either of the following types:-

- a) Outline Development Permission - the effect of which is to give approval in principle to the proposed development which is the subject of an application, but not to permit (except to the extent, if any, allowed by conditions attached to the permission) commencement of development to take place; or
- b) Full Development Permission - the effect of which is to permit the development, subject to the terms and conditions of the grant of Full Development Permission.

6. PLANNING POLICY CONSIDERATION

6.1 The relevant policies of the Land Development Control Plan (LDCP 2012 - 2022) that are applicable in the assessment of the proposed development are set out below:

6.2 Green Heartland: Policies GH1 and GH2

GH1: Primary Policy: There will be a presumption in favour of retaining the undeveloped nature of the Green Heartland and its natural ecology.

The grant of development permission will therefore be strictly controlled by the following implementation policies.

GH 2 No development permission will be granted for development which includes the construction of buildings above the contour line of 550m, except for:

- a) development required for the conservation, interpretation, study and appreciation of the natural ecology of the area (e.g. walkways, interpretation centre, etc.) and
- b) tourism-related development within established forest areas in the form of eco-lodges that will, as an element of the development proposal, remain forested sufficient to conceal the development from any viewpoint within the Diana's Peak National Park or visible in any view towards the National Park from a public road or public place, and
- c) tourism-related development in the area of Broad Bottom below the contour line of 600m that will, as the first principle of its design, detail, and operation (including transport) be an example of international best practice of sustainable development with the minimum of disturbance to the natural ecology of the area and the principal method of grassland maintenance to remain pasture grazing.

6.3 Social Infrastructure: Policy SI.1

- a) Development permission will be granted for all development reasonably needed for the social development of

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the Island and such development shall be designed to be sustainable in all services including collection, storage and reuse of rainwater and storage, treatment and re-use of grey water;

b) Development permission will not be granted for new residential, employment or tourism-related development which does not include adequate provision for the social development of the island including provision for people with disabilities; and development permission will not be granted which would prejudice or preclude such development.

6.4 Natural Heritage: Policy NH.3

Where proposed development is likely to have an adverse effect (either individually or in combination with other developments) on St Helena's native species and habitats including the Wirebird, permission will be granted only when the benefits of the development outweigh the impacts that it is likely to have on the national and international importance of that species or habitat. The proposals must include measures to ensure that any adverse effect is mitigated or compensated and this will be subject to monitoring to ensure that the measures are carried out effectively.

6.5 Road and Transport Policies: RT1(a, c & d), RT2, RT3 (a & b), RT5 (f) and RT7

RT1: Primary Policy

a) Development permission will be granted for the construction of new roads and the upgrading of existing roads appropriate to the Island's development needs (and utilising excavated waste and other secondary construction materials) provided that, in the design and layout of the roads to achieve safe conditions, speed and free flow of traffic shall be of lower priority than that of minimizing the impact upon the natural and built heritage of the island;

b) Development permission will not be granted for development which would preclude or prejudice the provision of new or upgraded roads and footways or alternative travel facilities necessary to serve new development.

c) Where new development is permitted it must include provision for; and shall not be brought into use until it is provided with, safe pedestrian and vehicular access, as appropriate.

RT.2 Development permission will be granted for new residential or tourism-related development of 100 or more habitable rooms or commercial development of 500m² or more, only where the proposal is accompanied by a traffic impact assessment and assessment of the structural condition of affected roads, and

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- a) measures for satisfactory vehicular access including off-site road improvements as appropriate, and
- b) provision of new roads within the development to a standard for adoption by SHG in accordance with adoption standards.

RT.3 Development permission for new development served by access from existing roads, including single dwellings, will be granted only where

- a) the geometry and visibility at the access create safe highway conditions in accordance with SHG standards in relation to the nature of the existing road, and
- b) existing road drainage is safeguarded or otherwise provided for in the development and the development will not discharge surface water to the road.

6.6 Water Supplies: Policies W.1(a) & W2

6.7 Sewage, storm and Drainage: Policies SD1 (a, b & c), SD3, SD.5 and SD7

6.8 Emergency and Public Services: Policy ES.1

7. RATIONALE BEHIND THE PROPOSAL

7.1 The development application is seeking renewal of the previously approved full development permission for the leisure development incorporating a 70 Suite Eco-Luxury Hotel, 18 Garden Suites, a 30 Bed Staff Accommodation Building, 165 Leisure-related residences, a Golf Clubhouse, a Lookout Interpretation Centre, a Sebastapol Centre, Golf Maintenance Facilities and a Golf Course at Broad Bottom, in the Thompsons Hill Registration Area that was granted consent on 15 June 2012 under development application reference 2012/66/TH and development consent amended on 14 February 2017 under development application reference 2015/119. The development permission consented above expires on 15 June 2020.

7.2 This is an ambitious housing, tourism and golf course development, that if implemented would be unprecedented in scale on St Helena although golf course and leisure resort development of this kind is commonplace in other parts of the world. The principle of house building on this commercial scale in the Green Heartland was accepted partly to enable funding of the hotel and golf course construction and ancillary buildings. The application was presented in 2012 as the World's 'greenest tourism hotel with environmentally responsible leisure related residences around a world class eco golf course at its heart'.

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8. BACKGROUND OF DEVELOPMENT APPLICATION AND REPORTS

8.1 The location for this proposal is Broad Bottom Farm, sited at Blue Hill. The land is sited North East of Head o Wain Clinic and takes in Broad Bottom Mill Flax Farm, site of the Boer Camp, Woodlands Gut, Kings Foot Forest, Broad Bottom Gut and Bevin's Gut. The site extent is 410.5 acres, see Diagram 1 (Location Map) and Diagram 2 (Application Site) in Annex D. The land is undulating, characterised by a mixture of pasture and woodland, hills and guts. The land is in agricultural and woodland use at present, owned and farmed by Solomon's and includes the former flax farm buildings. The full extent of the application site is indicated in the location plan.

8.2 The original development application in 2012, reference 2012/66/TH was submitted following a number of consultation events around the Island to seek local view on the proposed development. There was considerable support expressed for the proposed development with a number of letters supporting the development at development application consultation. The development application was submitted with an Environmental Impact Assessment.

8.3 There was surprisingly little detailed design information before the Authority in 2012 but this was accepted by Council acting as the Planning Authority at the time. The approved development permission is accompanied by drawings that refer to different phases of development, a basic layout masterplan and golf course layout, phasing plan and drawings and illustrations of various buildings including the hotel, see Diagram 3 (Proposed Development Plan) in Annex D.

8.4 The permission is regulated by a decision letter and six planning conditions, the first condition referring to schedule and provides for a Construction and Environmental Management Plan that encompasses a wide range of additional environmental work to be undertaken in advance of commencement of construction. No planning conditions have yet been discharged and the development permission was due to expire during June 2017 unless implemented or renewed before then.

8.5 The phasing plan and approved planning statement gives no indication of commencement of development, the duration of each phase or even stipulates that one phase shall be complete before operations are permitted to commence on a different phase.

8.6 Though occupancy of the proposed dwellings is restricted to

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holiday use it is unclear exactly how compliance with such a condition is to be monitored or enforced. This is actually quite a difficult condition to administer. Holiday homes are still considered to be dwellings (Class C3) and without special controls can be used as permanent accommodation. Monitoring and enforcement of occupancy conditions can be challenging in practice. Condition 4 refers to a use class C4 that does not exist under current Regulations.

8.7 The existing permission therefore raises a number of concerns and questions. Some of these concerns may be assuaged through the submission of additional information required by existing conditions but the standard of regulation applied to such a significant development is unusually forbearing which may potentially cause problems later on. However, as this application is for a renewal of the previous decision and there is no single change proposed, the process is very simple and straight forward in that the Government has only two options; it can either renew the previous development consent or alternatively refuse to renew the previous development consent and the reason can be that since the initial application in 2012, whilst the Government recognises the potentials of this development on the Island, the applicant has not shown much enthusiasm for the delivery of this development permission and it considers that since the resolution to grant development consent there have been changes in government priorities with the revised Sustainable Economic Development Plan; the Airport has been operational and there now a steady number and type of visitors to the Island; due to on-going global economic uncertainty such development may be high risk for potential investors and the environmental concern and issues of climate change a new development application with supporting evidence, a renewed EIA, should be requested to enable the Government to reassess the impact of such development proposal on the Island's natural and historic environment.

8.8 The applicant, SHELCO, has been interested in St Helena for well over a decade, well before the decision to construct the new airport. The applicant's vision for this site is pioneering for St Helena: car-free development that achieves very high environmental standards, the use of green living roofs, lime hemp walls, sustainable rainwater management, alternative methods of waste water treatment and a golf course that is naturally grazed.

8.9 Development permission runs with the land and not with the applicant. The current applicant is a limited company that could sell off the share capital in the company without the permission of Council (notwithstanding the Immigration Ordinance). Some

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caution is needed to maintain effective control over implementation of the development on this scale to ensure that: the hotel and amenities are actually delivered; there is coordinated implementation of accommodation, access and servicing provision and landscaping mitigation; and that effective planning control is exercised to ensure that the development shall always remain an attractive leisure and tourism asset, accessible to the wider community.

8.10 The 2015 application, reference 2015/119, was for a slight amendment to the earlier development permission and related the initial phases of development. A revised planning and environmental impact report was also submitted to support the amendment. The submissions in most respects mirror the application submitted and approved in 2012 although the applicant made a few amendments to the text of the Planning Statement and also provided some additional information on levels and drainage which was helpful.

8.11 The drawings submitted were still conceptual and inadequately detailed to carry out a complete and professional assessment against development plan policy. The development application was approved and a Planning Agreement was recommended prior to the issues of development Permission. This agreement would ensure that:

- a) the development be planned and operated to be car free and maintained as such for the lifetime of the development
- b) notwithstanding the provisions of the General Regulations all dwelling houses to be constructed on the application site shall be occupied and used only as holiday residences and for no other purpose.

8.12 To be effective the Planning Agreement should be binding upon all future subdivisions since the applicant has indicated that many of the homes would be offered as fractional ownership.

8.13 In accordance with decision notice issues dated 14 February 2017 under reference 2015/119, the development permission expires on 15 June 2020, unless development has commenced in regards to development permission granted under development application reference 2012/66/, except for Condition that has been amended under reference 2015/119.

9. REPRESENTATION

9.1 Representations have been received to the development application seeking renewal of original permission from members of the and the Saint Helena National Trust. The issues raised are summarised as follows:-

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- a) During the last decade St Helena has been experiencing a cycle of severe droughts and there has been water restrictions that are still continuing
- b) St Helena is caught up in global climate changes with severe weather conditions which in the next decade are going to be more extreme
- c) This small Island has a fragile ecosystem, most of the land being barren, particularly regarding its water resources, it is essential not only to address the current drought but plan for the future. This is one of the main objectives of the St Helena Government in its 10 year development plan 2017 – 2027 not just to plan for the short-term but also to “plan for future”;
- d) St Helena Government’s current Sustainable Economic Development Plan 2018 – 2028 (SEDP has as one of its main objectives to “sustain St Helena’s natural resources for this generation and the next”;
- e) Proposal is for a major development in the Greenheart area that has traditionally been farming area, this major development has huge impact not only on the environment but socially, particularly on the water resource in that region, drawing water resource that is the water table for the whole of the Western part of the Island;
- f) Before any decision is made there should be (a) an Environmental Impact Assessment and (b) a Social Impact Assessment for the whole development taking into account matters raised above addressing current related policies for their impact in the short and long term to meet the St Helena Government’s agreed national objectives;
- g) The SEDP states its focus on developing all sectors which can help to ‘increase exports and substitute imports’, what will be the impact of planned development in this location to meet this objective and to what extent will there be a decrease in local meat production from this location;
- h) Development will destroy good quality agricultural land of a type that is rare on St Helena being level enough for machinery to operate, loss of land will be contrary to the Social and Economic Development Plan which came into existence after the application was first approved and this is one of many changed circumstances that will need to be considered;
- i) There is now an operational airport and two new government funded hotels and these currently unfairly compete with existing hotel catering establishments;
- j) Proposal for a five storey building in open countryside is completely out of place and should be refused;

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- k) ExCo claims to be 'sitting as the planning authority' it is not the planning authority, it is the government who must take account of other government policies and changed circumstances that are outside the planning authorities remit;
- l) It would not be right to rely on any previous EIA as even methods of assessment have changed and that a new EIA is required for this application which should take into account social effects as well as natural considerations such as those above including sustainable water supply;
- m) Since the previous application was approved St Helena has changed significantly and new legislation and policy has been introduced and there has been more development and there are obvious signs of climate change and an evolving environment, given this ever changing nature of the Island the proposed development should be a new development application;
- n) New application would allow material planning consideration and any environmental and social impact to be realised and appropriate mitigation to be put in place to remove any risks;
- o) SHG's 10-year plan gives commitment to eco-tourism and agrees to work with partners to preserve the environment and local heritage and whilst the proposed development in the green heartland is sympathetic to the fragility of this area and its eco-system, it is no longer strictly consistent with SHG's commitment to eco-tourism and protecting the environment so that it can be enjoyed by tourist in its natural state, the plan also commits to building a multi-faceted economy that is not focused on tourism but also committed to encouraging local fishing industry and agriculture;
- p) Other constructions have had significant impact on the environment at Prosperous Bay and surrounding areas on the wirebird habitat and according to the EIA for Bottom Woods there are no birds or habitats in this special area and following the construction of the Airport there has been little or no rehabilitation of the area by SHG to encourage wirebirds to use this area and clearly displaced;
- q) Broad Bottom area is a known wirebird area and given the lack of threat in this area it is probable that displaced numbers have returned there and without an EIA there is a missed opportunity to ascertain current wirebird numbers or to ensure alternative land for rehabilitation;
- r) Considerable amount of time has elapsed since approval was granted and the risk that material matters that affect Broad Bottom have not been previously considered;

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- s) Request an extension to the time period for review and submission of a response;
- t) Manner in which consultation has been provided for, with no map or plans, as no details of the proposed development have been provided to enable one to make an informed response;
- u) Clarity on whether planning permission was previously provided with conditions and, indeed whether an EIA has been conducted and consultation would be aided by circulation of the report;
- v) Application states that public consultation last took place in 2012: eight years ago as this to be a substantial development and so it would benefit from current dialogue with the community and wider stakeholders;
- w) Concern was previously raised by the proposal to build in the Green Heartland Zone and this is something the Trust would be well placed to advise on further in terms of the impact on our natural capital.

9.2 Officer Response: Many of the issues raised by the representation question the impact of the proposed development on the Island's natural environment and eco-system, in particular the scarce water resources. Whilst the impact on the environment and Island's water resource is an important issue with water shortage due to lack of rainfall, however periods of drought has been cyclical and the development application has previously considered the potential impact of the proposal on the environment. It is now eight years since the first development application was made accompanied by detailed plans and drawings and supporting documents that included an EIA and Environmental Management Plan and over four years since the requested for review of conditions was made. The previous reports to Governor-in-Council set out full assessment of the proposal and permission was granted with a number of conditions.

9.3 It is considered that environmental conditions in the area of the development application have probably changed little over recent years as there has been little or no change in this part of the Island with other developments whilst there has been some change due to developments in other parts of Island, more noticeably with the development and operation of the Airport on the southeast of the Island. There have also been no changes to the Ordinance or development plan policy since the grant of previous permission.

9.4 The Island's Sustainable Economic Development Plan has been revised in recent years to promote greater economic diversity and sustainable tourism remains a priority economic

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and development sector as well promoting sustainable agriculture, forestry and fishing sectors.

9.5 The development application is seeking renewal of previous consent and does not include drawings, plans and supporting documents as there is no change to the previous proposal and anyone wishing to review these plans could review the previous development application file to enable them to make an informed response.

10. OFFICER ASSESSMENT

10.1 The development proposal as set out in this application for renewal of development permission granted under references 2012/66/TH and 2015/119 accords with the principles of the policy objectives in the LDCP in particular the most significant policy for the Green Heartland Zone. The renewal request also remains in compliance with the various LDCP policies against which the development has been assessed.

10.2 The application site is situated in the Green Heartland Planning Zone and the development accords with the thrust of Development Plan Policy. Residential and commercial development on this scale in the Green Heartland would not usually be considered under the Principal Policy GH1, however there is one significant exception set out under the Implementation Policy GH2 and this policy supports tourism related development in the area of Broad Bottom below the contour line of 600m. The proposed development is therefore continued to be supported by LDCP policies and there does not appear to be any material consideration that states otherwise. In view of this, it is considered that the renewal of the development application is in compliance with LDCP.

10.3 The proposed development at Broad Bottom has been in the offering for over eight years and whilst the applicant may still be enthusiastic about the proposal by seeking renewal of the development permission, however there is no evidence of any intention to deliver this development by providing information or discussing details with Planning Officers for the discharge of any of the conditions that may show some commitment to deliver this development.

10.4 The LDCP is being reviewed and will be out for public and stakeholder consultation in the near future. In view of this any extension of renewal of the development permission should not exceed three years as the revised Plan will have been

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adopted and revised policies would be applicable. LDCA was minded to recommend to Governor-in-Council to renew the development permission, the applicant should be advised that further renewal applications of this development permission would not be supported in light of revised LDCA having been adopted and future development applications would need to be in compliance with then adopted development plan.

10.5 Since the decision of LDCA to recommend to Governor-in-Council that renewal of the development permission should not exceed three years was made at the January 2020 meeting, further correspondence has been received from the applicant, having reviewed the Chief Planning Officer's requested that renewal should be for five years. The points raised by the applicant that are relevant for discussion on the development application decision are summarised below:

- a) Lack of meaningful international air access that was historically acknowledged by SHG is a pre-requisite to release both the capital investment and the visitor numbers for an international luxury hotel, and to be viable in such an equally remote and desirable destination;
- b) Without meaningful air access, none of our proposed projects are ever likely to be financially feasible;
- c) Recognising the importance of air access, the last two or more years have been spent attempting to generate interest from proposed airline partners, with a view to establishing a proper air service;
- d) Efforts have even equalled or surpassed the efforts of SHG, in that doors have opened and discussions have got off the ground that may eventually bear fruit, these efforts have not yet borne fruit due to a number of factors, including the failure of the consultants appointed to provide a study on precision approach landing aids, the report is still awaited and is crucial to enable a proper feasibility study by possible partners;
- e) SHELCO and one or two possible hoteliers, remain enthusiastically committed to the realisation of the consented proposals subject to air access; position has neither wavered nor changed since before the original consultation period;
- f) 'Deep green' environmental proposals for this development are future-proofed against climate change and recent increased international awareness has not changed the environmental requirements of the proposals as these still exceed current standards;
- g) An Environmental Consultant has been instructed to take the necessary steps to comply with condition 1 of the consent, by drafting our Environmental Management Plan, which will

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- include a Construction Environmental Management Plan for approval; this will enable commencement of work on site without delay when the economic drivers enable us to do so;
- h) Very important rationale for requesting five year extension to the planning consent, is the reality that hurdles have to be overcome in a specific order PRIOR to development being enabled and these hurdles are well known and includes resolving precision approach landing aids, resolving the highly negative and destructive fake-news media component and bringing about meaningful air-access;
 - i) Capital raising cannot even commence, until meaningful air access has been achieved and a capital funder would want to see that the window of opportunity will not be slammed shut immediately after the capital raising;
 - j) whilst a three year extension might enable us to pull some of the pieces of the jigsaw together, it might also be the straw that breaks the camel's back, in that the tightness of time could result in possible funders deciding on a no-go approach, thereby killing off the project, whereas a five year extension gives better chance of achieving this.

10.6 It is considered since the initial development proposals were mooted some 10 years ago, there have been considerable changes in the economic and environment conditions on the Island. It is appreciated that major development projects in more stable economic times can take many years to formulate, develop and reach delivery, however the remote position of the Island and the development and progress of air access is taking longer than expected. The development process has to have regard to the development plan that may change over time with competing economic, social and environmental priorities as the development plan is revised. Similarly there are also requirements that development proposals are considered in light of the most recent guidance and regulations.

10.7 As the initial development application was submitted in 2012 and the decision was in June 2012, it is already nearly eight years since approval was granted. The applicant has already benefitted from an additional three years since the earlier decision following the review and decision to vary the number of conditions. The revised LDCP is likely to be adopted in 2021 and a number of environmental conditions and factors will already be having some bearing on this development proposal by June 2023 if it has not already commenced, should the Governor-in-Council be minded to renew the development permission for three years as recommended by LDCA. It is, therefore, inevitable that if the proposed development has not already commenced then future development proposals should be assessed against the policies, regulations and guidance that

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apply. Similarly if the applicant/developer is unable to commence works on site and seeks a renewal of the development permission, then all mitigating circumstances such as economic conditions locally and globally that affect finance and investment decisions may be an important consideration as well as changing development policy and environmental factors. It is worth mentioning that the current global concerns that is already having unprecedented impact globally will be a contributing factor.

10.8 Furthermore, in order to show commitment to the delivery of this development, the applicant/developer could start work on site, including seeking discharge of conditions requiring that require more details of the development to be approved before work commences. The informative set out with the permission requires that the commencement of works should be substantial and these should be agreed in writing with the Chief Planning Officer acting on behalf of the LDCA.

10.9 In view of the issue highlighted above, whilst having regards to the concerns raised by the applicant, it is considered that if the Governor-in-Council is minded to renew the development permission 2012/66 and 2017/119, then it should be for a period of three years with addition of the informative set out in Annex B to this report.

FINANCIAL IMPLICATIONS ECONOMIC IMPLICATIONS

11. Executive Council acts as the Planning Authority in this case.
12. Should the development go ahead, delivery and implementation of the development will promote growth in the construction sector and will contribute toward economic growth and prosperity. It will also be a draw to tourists because the facilities provided would far exceed what is currently available.
13. However, it is noted that the development is conditional on 'meaningful international air access'. The predictions for air access growth is moderate year on year growth based on travel from Southern Africa, particularly in peak season. Based on the technical ability of aircraft, the prevalence of ETOPS certification and general economics, there is not an expectation that within the three – five year period there will be direct flights to the UK, with or without stopover. As well as the Tourism Survey showing that the majority of tourists prefer self-catered accommodation in Jamestown, as a result, and as has been suggested by the application itself, the original

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business plan may not be viable if completed within a five year period. Thus there is a high likelihood, unless stated by the applicant otherwise, that construction would not be commenced and this land will stay unused.

14. Land is a scarce resource on St Helena and should be mobilised for development wherever possible. However, by granting planning permission on the site to the applicant, who is unlikely to develop it, this is an opportunity cost as it precludes any other potential investor from the site option.
15. Without agreement from the applicant to commit to commencement and completion dates, the economic benefits associated with the build are unlikely to come to fruition within the time frame of the planning permission.
16. However a development of this size may be more palatable in the medium to longer term as St Helena's visitor numbers continue to increase. There may be merit in keeping the investor on board by continually awarding planning permission until such time that the plan becomes viable and the plot is developed.

CONSISTENCY WITH INVESTMENT POLICY PRINCIPLES

17. Applies to:
 1. Make St Helena a desirable and competitive destination to do business by removing barriers to investment.
 3. Support an economy which is accessible to all potential investors and promote investments across the economy.
 4. Support the locally based private sector to compete in an open economy but, where possible, avoid being overly protective.
 5. Promote fair, consistent and transparent decision making.

PUBLIC/ SOCIAL IMPACT

18. The investment arising from this development will create training and employment opportunities in the construction industry and has the potential to promote tourism industry on the Island, with the increased supply of residential and tourist accommodation.

ENVIRONMENTAL IMPACT

19. The proposed development will have significant environmental impacts. These impacts were identified and assessed somewhat in the EIA and other preliminary environmental work. Both adverse and beneficial impacts have been identified and the proposed development plans to utilise a number of innovative sustainable environmental design features. However further work detailing how impacts will be managed and mitigated to reduce or alleviate adverse impacts and enhance positive impacts was requested as a planning condition on the original development permission. This work is still outstanding and as such we do not have an

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accurate assessment of the environmental impacts of the development. If a renewal to the development permission is granted the applicant should be requested to provide a timetable as to when this work is likely to be completed and when certain mitigation measures are likely to commence. It should be noted for example that some of the proposed mitigation like creation of compensatory habitat for wirebirds should be started well in advance of the start of the development and any ground disturbance works.

PREVIOUS CONSULTATION/ COMMITTEE INPUT

20. The development application was advertised for a period of two weeks to seek comments from the community and stakeholders on the development proposal. There have also been previous consultations on this proposed development, more significant of this was the pre-application discussions on the Island by the applicant before the initial development application was submitted.

PUBLIC REACTION

21. There was representation received from members of the public to the proposed development and the issues raised have been assessed and responded to in Section 9 of the report.
22. Due to media attention in the past and as this has been on the Island's development agenda for a number of years this is likely to generate public and media interest.

PUBLICITY

23. The decision will be covered in the radio briefing following the meeting.

SUPPORT TO STRATEGIC OBJECTIVES

24. Goal 5 of the SEDP is to Improve Land Productivity

LINK TO SUSTAINABLE ECONOMIC DEVELOPMENT PLAN GOALS

25. Goal 7 of the SEDP is to improve public infrastructure, to provide an environment that promotes investment.

SOB

OPEN/CLOSED AGENDA ITEM

26. Recommended for the Open Agenda.

Corporate Support
Corporate Services

24th March 2020

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