

ANNEX C

TO THE EXCO REPORT 15 JUNE 2021

TRADE WINDS OCEAN VILLAGE DEVELOPMENT APPLICATION

CONSULTATION RESPONSE RECEIVED FROM STAKEHOLDERS:

- 1. CONNECT – WATER – MAY 2020**
- 2. CONNECT – WATER – APRIL 2021**
- 3. ENVIRONMENT MANAGEMENT – MAY 2020**
- 4. ENVIRONMENT MANAGEMENT – APRIL 2021**
- 5. HERITAGE SOCIETY – MAY 2020**
- 6. HERITAGE SOCIETY – APRIL 2021**
- 7. SAINT HELENA NATIONAL TRUST – MAY 2020**
- 8. SAINT HELENA NATIONAL TRUST – APRIL 2021**

Planning Section - Development Application Consultation Form

To view Applications and Drawings: Visit at Planning Office Essex House

For more Information Contact Tel: 22270 or Email: shane.williams@sainthelena.gov.sh

Application No.	2020/35		Please Reply by:		4 pm on 28 May 2020	
Type of Application	Full Application	<input checked="" type="checkbox"/>	Outline Application	<input type="checkbox"/>		
Description	Proposed Comprehensive Development Area with Environmental Impact Assessment to create 150 High-end Residential Homes together with Reception, Tennis Court, Swimming Pool, Managers House and associated ancillary buildings as well as c.8 acres of public country park/picnic/camping area and associated hiking trail as well as log type adventure children's playground and male/female public ablutions with dish wash and associated public car park.					
Applicant	Saint Helena Developments Limited					
Parcel	TH0185 and 0186 Block 1					
Location	Horse Pasture					
Co-ordinates	E: 205382.734			N: 8234377.803		
Conservation Area						
LDCP Development Zone	Intermediate	<input type="checkbox"/>	Coastal	<input checked="" type="checkbox"/>	Green Heartland	<input type="checkbox"/>
Additional Info: Please be advised that all of the documents submitted with the application form can be found on the applicant's company website for viewing. https://tradewindsplc.com/ocean-village/ However, if you would like to have a set then this can be arranged by having it copied to your flash stick.						

Institution	CSH		2020/35
No Objection	✓	Objection	
Additional Comments / Recommendations / Conditions			
<p>Connect St Helena is unable to supply the required amount of water needed for this project during the construction stage and subsequent occupation of the development.</p> <p>However the company recognise that the proprietor proposes to construct a number of Dams / reservoirs for this purpose with the intension for Connect to take ownership of the infrastructure once commissioned.</p> <p>Connect St Helena would expect them to adhere to either EU or SA Dams standards as we do not have Dams standards to pass to them. We did mention to them that we do follow the EU and SA standards and if their consultant does use any of the two we will be happy with that.</p>			
Name Paul Duncan	Signature		Date 4.5.2020

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Institution	Connect Saint Helena Ltd		2020/35
No Objection		Objection	
Additional Comments / Recommendations / Conditions			
<p>Additional Comments</p> <p>We have just noted from the referred documents on pages 61 and 129 (document 3) that the prioritisation of Bulk water supply makes CSH as the second priority. This information is contrary to the information in document 2 (planning and design statement pages 17 to 19) which we agree to.</p> <p>Below is the extract statement from page 61:</p> <p>“Tanks will be supplied with rainwater from public buildings and supplemented from municipal supply.”</p> <p>Below is the extract statement from page 129:</p> <p>“The bulk tanks will be supplied via rainwater harvesting from the buildings and supplemented from the local supply.”</p> <p>This development is sufficiently large that it will need a separate standalone system which once installed we are more than happy to adopt and maintain. At the moment, current resources cannot sustain such a development without substantial investment.</p> <p>The extract from document 2 (page 17) that we fully support states in section 3.4 Bulk water System:</p> <p>“The proposed development takes cognisance of the challenging water supply situation on St Helena and is as such proposed to be designed to be primarily stand- alone thus having minimal impact and demand on the municipal availability. Subject to final Engineering calculation, detailing and design the proposed system is anticipated to incorporate the following;</p> <ol style="list-style-type: none"> 1. Primary supply - Rainwater harvesting into bulk storage 2. Secondary supply – Supplementary supply from proposed dam construction on adjacent property 3. Secondary (Alternate) supply– Supplementary supply from desalination plant at Lemon valley, subject to relevant approvals and only if needed.” 			
Name Paul Duncan	Signature	Date 17.3.21	

Wed 01/07/2020 17:30

Isabel Peters <Isabel.Peters@sainthelena.gov.sh>

To Ismail Mohammed ismail.mohammed@sainthelena.gov.sh

CC Karen Isaac <Karen.Isaac@sainthelena.gov.sh>; Darren Duncan

Darren.Duncan@sainthelena.gov.sh

Review of Environmental Statement - Trade Winds Ocean Village

Dear Ismail,

My apologies for the delay in getting comments to you on the Environmental Statement (ES). It has been very difficult to review this report and determine if it meets the basic requirements of an EIA Report as set out in the Land Planning and Development Control (Environmental Impact Assessment) Regulations, 2013 as the ES has largely been written in accordance with South African Regulations. As a result it includes a lot of superfluous information and not enough detail on the actual site and potential issues.

As a start the report should be titled Environmental Impact Assessment Report and not Environmental Statement. I understand that previous legal advice given to the LPDCA was that if the report was not given the correct title it should not be accepted as it does not conform to the statutory requirements.

There is no reference in the ES to our EIA Regulations and the ES has not been written in accordance with the requirements of what an EIA Report should include as per Regulation 2, in summary:

- The physical characteristics of the development is included along with land-use requirements.
- There is a description of the construction and operational processes including the nature and quantity of materials to be used but more detail is required in some areas. For example the use of tiger worms for waste water treatment, is it intended that these will be brought in and if so in what medium bearing in mind biosecurity constraints. If the worms used are to be sourced on island how will this be done? How will the rainwater be treated and monitored to ensure it meets the quality for potable water?
- The identification of environmental issues is weak, and has been based on South African guidelines, it would have been more appropriate to use the topic areas in our Screening and Scoping Checklists.
- The method for assessing the impacts is described, however as there is insufficient detail on the impacts identified, it is difficult to follow how the assessment is arrived at.
- The data used is also questionable. The weather data for example references Jamestown. Whilst some attempt has been made to establish what flora and fauna is on site, a full ecological baseline has not been established and there are a number of references to species that are not named. There are also odd references to for example amphibians and reptiles. The references to land capability do not reference the current land use.
- Mitigation measures are included and are quite comprehensive. Some measures for monitoring and reporting are also included. Again though as the identification of impacts is weak, there isn't a clear follow through of: impact identification – assessment of impact – suggested mitigation – assessment of impact after mitigation – monitoring and reporting.
- An outline of alternatives studied is included.
- A non-technical summary is not included.

- Some indication of assumptions made and constraints is included.

Please share these comments with the LPDCA, I know they were keen to discuss the ES with me but unfortunately I am not available for the meeting tomorrow.

As an aside EIA Reports are generally very time consuming to review and as previously raised I am concerned at the quality of reports that we are receiving. It would be helpful if Planning could instigate a system whereby EIA reports are checked against a basic criteria upon receipt and prior to acceptance, this should include as a minimum the correct name of the report and the correct legislative references.

I would be happy to discuss further but please be aware that my availability between now and the 20th July is very limited.

Kind regards,

Isabel

Please note change in email address

Isabel Peters

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Environment, Natural Resources and Planning Directorate
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Establishment of Trade Winds Ocean Village, Parcel No 186, Block 1, Thompsons Hill, St Helena Island

Review of the Environmental Impact Assessment Report

Reviewed by: Isabel Peters, Chief Environmental Officer

Review Completed: 22nd April 2021

This review has been done to fulfil Regulation 3.(1)(a) of the *Land Planning and Development Control (Environmental Impact Assessment) Regulations, 2013*.

Approach to Review

The Environmental Impact Assessment Report (EIAR) has been reviewed in relation to how well it meets the requirements of Regulation 2 of the *Land Planning and Development Control (Environmental Impact Assessment) Regulations, 2013* which states what should be included in an EIAR. Within the EIA process a Scoping Opinion can be used to set out what should be included in an EIAR and this is usually requested by the applicant from the Chief Planning Officer (CPO). As there is no reference to this having been done, the EIAR can not be reviewed in accordance with a Scoping Opinion. Conformance with Regulation 2. (1) (c) will therefore be assessed based on the environmental issues identified in the EIAR itself. It should also be noted that no Terms of Reference for the EIAR were included.

Direct references to the EIAR are included by page number denoted in [] as [pg x].

General Observations

This EIAR is a revised submission of a previously submitted report. The review of the original report noted a number of issues that needed to be addressed. The EIAR addresses some of the issues raised but there are still a number of shortcomings.

Although the EIAR is set out with clear sections and sub-sections, the EIA process isn't easy to follow. There aren't any details of how the CPO determined that an EIAR was required [Pg 25 and 30] and although a screening and scoping checklist was included in the EIAR [pg 37, Table 6] and a Scoping Report has been commissioned by a third party consultant [pg 41, 4.3] it is not clear how these fit into the EIA process. Usually a screening determines which impacts are potentially significant and whether this is a trigger to continue the EIA process and produce an EIAR, whilst the Scoping determines what should be included in the EIAR.

The EIAR is not structured to show a clear process of identification of impacts, establishment of baselines, assessment of impacts, identification of mitigation measures, assessment of impacts after proposed mitigation and monitoring and reporting.

Governing Legislation and General Approach to EIAR

EIAs should be done in accordance with the *Land Planning and Development Control Ordinance, 2013* and the *Land Planning and Development Control (Environmental Impact Assessment) Regulations, 2013*. There are no additional published guidelines.

Whilst the EIAR does reference the *Land Planning and Development Control Ordinance, 2013* and the *Land Planning and Development Control (Environmental Impact Assessment) Regulations, 2013* [pg 23, pg 30] there are references to the *Land Planning and Development Control Ordinance, 2008* [pg 10 and 11] and subsequently references to Type A and Type B developments. This is confusing and

incorrect as the 2008 Ordinance which included provision for Type A and Type B developments was replaced by the 2013 Ordinance and the reference to Type A and Type B developments was removed. There are also references to *A Procedural Manual for Environmental Impact Assessment, 2010*, this was written to accompany the *Land Planning and Development Control Ordinance, 2008* and is therefore now out of date. The approach to the EIAR includes references to this Manual [pg 35, Figure 4] and also categorises the development as a Type A development [pg 36] which is incorrect. The Screening and Scoping Checklist used [pg 37 table 2] has also been taken from the Manual and is therefore an earlier version to the one currently used. The approach to what should be included in the EIAR [pg 42, 4.4] appears to have been largely taken from the requirements for a Type A development as stated in the (out of date) Manual although this does broadly reflect what should be included in an EIAR as per Regulation 2, *Land Planning and Development Control (Environmental Impact Assessment) Regulations, 2013*.

Review

In accordance with Regulation 2, *Land Planning and Development Control (Environmental Impact Assessment) Regulations, 2013* an EIAR should include:

(a) Description of the physical characteristics of the development including land use requirements

A description of the physical characteristics of the development and land use requirements is included [pg 26, 2], further detail is included in the Scoping Report [pg 185] and further references are made throughout the EIAR.

(b) Description of construction and operational processes including the nature and quantity of materials to be used

Descriptions of the construction and operational processes to be used are included for roads and access, buildings, electricity supply, water supply, sewage treatment and drainage although the descriptions are fairly general and lack detail. For example for the internal electricity supply (noting a possible mix of mains supply and solar panels) there is reference to final design refinement post planning approval [pg 59], for sewage treatment the use of a biolytic digester is stated [pg 64, 13.1], however no further information on this is given. There is a reference to using desalination if necessary [pg 137] but no further details are given.

(c) Identification of environmental issues

A screening and scoping checklist was used to identify the relevant environmental issues [pg 37 Table 6]. It was noted that the following issues had not been considered: Visibility from the sea and coastal areas; the potential for the excavations on site to cause scarring and erosion, undermining of rock stability and the potential for rockfall and land slides; new access requirements on to and within the site and impact on recreational users of the area (campers, picnickers, fishermen).

It was also not altogether clear how this checklist was used in this EIA process. The last column 'Significance' references significance in the context of mitigation. As the checklist is usually used to determine whether or not impacts are significant enough to require an EIAR, significance is usually recorded before mitigation.

Some groups of people have been omitted from the Interested and Affected Parties (IAPs) [pg 41, 4.4.2], adjacent landowners should include residents in adjacent and nearby properties particularly those that will be able to see the development from their properties and those who will be affected

by the increase in traffic in the area. Campers, picnickers and fisherman that currently use the area should also be included.

(c)(i) Quantified assessment of impacts

Impacts have been identified [pg 66, Table 10] and there is a clear criteria for the impact assessment [pg 88, 15.3]. Issues are rated before and after mitigation.

(c)(ii) Statement of data and baseline information used

Sections 6. to 14. provides data and baseline information. There are a number of shortcomings. For wirebirds [pg 51] further information should have been included on the overall significance of the site and the importance of the area as wirebird habitat. Island-wide census data and year on year analysis could have been included to show trends and give a more accurate picture.

The section on invertebrates [pg 53, 8.1.3] includes an overview of invertebrates found on the Island, however it is not clear what relevance this has to the development area. Reference is made to the invertebrates found during a survey in December 2020. The full report, the Biological Survey Report is included as an Appendix. (See comments later on).

The section on flora [pg 54, 8.2] also includes information on St Helena flora generally and it is not clear which species are in the development area. The Biological Survey Report does include a list of all of the plant species found in the development area.

As the development site is one that has not been previously developed, nor to my knowledge have there been any detailed surveys of this site, a baseline ecological survey was needed to establish what is on the site (this would also be in line with what was required for other recent large developments, i.e. Bunkers Hill housing development and Horse Point Satellite Park).

An independent environmental consultant (a botanist) was commissioned to provide supplementary environmental information although the description of what was requested is a bit odd for a botanist [Pg 164]. For the flora and fauna survey it appears as though a walk over of the site was done although the terms of reference for this is not given.

The methodology [pg 166] for this lacks detail. There is reference to a desk study but it is not clear how much information was available for this area and from the literature cited there were no references to actual studies done in this area. The survey methodology is not detailed, there are no maps of the area showing survey points or areas covered and the survey was done over a short period during the dry season. Reference to seasonal variations is included with the conclusion that only minor variations are likely although there is no explanation as to why this conclusion has been drawn.

Whilst there is a good description of the flora present this is not mapped either generally or in relation to the actual proposed development. The series of photographs [pg 136, Appendix B] should have been labelled to show the key features/ species depicted. A description of fauna (mammals, birds, reptiles, amphibians and invertebrates) is given. The wirebird section should be more developed and would have benefitted from direct dialogue with the SHNT. The invertebrate assessment is particularly weak, no sampling was undertaken or reference made to the findings of other surveys with similar habitats [Pg 171]. Further information on the blushing snail and where it was found should also have been included [pg 130, pg 171]

The heritage section [pg 58] is weak, further details on the identified features should be included.

The climate section [pg 59-60, 10.2] gives general statements, there are no references to rainfall, temperature and wind at the development site.

A biolytic digester is proposed for sewage treatment [pg 64, 13.1] but there are no details on how this would work.

Cumulative Impacts (pg 71) are considered but this section is very brief, further impacts could have been identified and discussed.

(c)(iii) Mitigation Measures

Some mitigation measures are included with the baseline information [in Sections 6 to 14]. Wirebird Management Guidelines have been included [pg 52] these are acceptable but the SHNT should have been consulted to ensure advice given is consistent for this species. Under the recommendations for seabirds there are recommendations to minimise the impact of lighting [pg 52], further references to sensor external light fittings and all lighting to be of low pollution design is also referenced [pg 34]. This is a good approach to minimise light pollution and impact on biodiversity. It should be noted that the development will need to comply with dark skies requirements and the legislation when it comes into force though noting this is still in draft and there are no regulations or guidelines for this at this time.

Further possible mitigation measures have been identified [pg72, Table 11]. From the issues identified the mitigation measures proposed are mostly appropriate. The following is noted: Reference to a botanist (flora (plant) expert) for monitoring wirebirds and other fauna (animals), this would not be appropriate unless the person is multi-skilled. The reference to blocking amphibian and reptile access is considered unnecessary in the St Helena context as we only have 1 species of frog and 1 of gecko. Reference to fauna species could be more specific to the fauna species actually here. Likewise references to institutional set-up could be more specific, [pg 79 references local authority], [pg 74 references waste to be disposed of at an appropriately licensed facility this should be HPLS]. There is reference to a burning programme to control vegetated areas [pg 80], although it is recognised that this is an effective control method elsewhere this is not usually done here.

(v) Monitoring and Reporting Procedures

Monitoring and reporting procedures are not included in the EIAR but there is separate document covering this, the Environmental Management Programme (EMPr).

(d) Outline of Alternatives

An outline of the alternatives considered is included with reasons for choices. No alternative sites were considered but the justification for this is acceptable [pg 32 s.3.].

(e) Non-Technical Summary

A Non-Technical Summary is included. As this is intended to be a quick reference for a lay person Table 1 Summary of Construction Impacts [pg 17] and Table 2 Summary of Operational Impacts [pg 20] should be clearer, stating what Ext, Dur, Mag/ Pro means and why there are 2 sets of columns.

(f) Indication of Assumptions made and Constraints

There is a brief reference to the assumptions made [pg 127, 15.7]. No reference is made to constraints and the point stated on gaps in knowledge does not make sense.

Conclusion and Recommendations

An EIAR should be of a quality and level of detail to enable the environmental impact of a development to be adequately assessed by the determining body. Whilst the EIAR does include an identification of environmental issues, an assessment of impacts and proposals for mitigation, the underlying baseline for some of the issues is considered inadequate. This relates particularly to the ecological baseline which has still not been achieved. For the reasons discussed earlier a full ecological baseline should be established with species of significance clearly mapped on to the development site plan so the impact of the proposed development can be clearly assessed.

As this is the second version of this EIAR, I would suggest the inadequacies noted in this review are addressed by way of an addendum to the EIAR rather than a rewrite and resubmission of the entire EIAR.

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Institution			2020/35
No Objection		Objection	Objection
Additional Comments / Recommendations / Conditions			
<p>Supporting information for the Heritage Society Objection submitted previously.</p> <p><u>1) Application fails to meet requirements for development in LDCP Coastal Zone and Housing Policies CZ.3 (e) and H.3.</u></p> <p>LDCP Policy H.3 “Development permission will be granted for dwellings on land in the Coastal Zone where the proposed development complies wholly with policy for the Coastal Zone CZ.3...”</p> <p>LDCP Policy CZ.3 “Outside Coastal Village Areas..., development permission will be granted in the Coastal Zone for tourism, recreation-related and residential development, provided (e) where the development is not within 250m of the shore, the development is sited such that it has land at least 10m higher than the development on at least two sides of it within a distance of 250m”</p> <p>Within 250m of the development only 10% of land 10m or higher. The rest of the development protrudes above its surroundings by as much as 180m. The application does not comply with CZ.3 (e) and therefore it does not comply with H.3.</p> <p><u>2) Application fails to meet requirements for development in LDCP Social Infrastructure Policy SI.1 (b)</u></p> <p>LDCP Policy SI.1 (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.”</p> <p>The application site is used in its entirety by the public as a designated campsite which has been established for decades. The application seeks to reduce the established availability for camping from 73 acres to just 6. This is a reduction of 92% which cannot be described as an enhancement of existing facilities in SI.6 “Development permission will be granted for development to enhance the facilities at existing community centres and recreation areas and for the creation of new facilities including playgrounds.”</p> <p>The application will “prejudice or preclude such [social] development” envisaged in the SI.1 (b) so “development permission will not be granted”.</p> <p>3) Social Impact Assessment</p> <p>The points above are omitted from the Environmental Impact Assessment Report.</p> <p>Camping is part of the culture of the people of St Helena and therefore part of the heritage of the island. The ‘exclusive’ gated nature of the proposal also runs counter to the culture of the island and is therefore likely to have an adverse effect upon the environment. As the application is likely to have an adverse effect on the people and culture of the island a Social Impact Assessment and Social Impact Report should be required under section 21 (2) of the Ordinance.</p> <p>4) Economic Impact Assessment</p> <p>The applicant has stated intention to sell houses on the site for example prices well in excess of the current housing market. This could have an adverse effect on the housing market of the island which could lead to local people being priced out of the market. This could have a serious effect on the culture of the people of St Helena and therefore the island’s heritage. An Economic Impact Assessment and Economic Impact Report should be required under section 21 (2) of the Ordinance.</p>			

5) Horse Pasture is the major site for the habitat of bees owing to the flora. Reduction of this habitat through the proposed development could undermine the island policy to produce its own honey.

6) The layout of the site is uninspiring and with its gatehouse facilities is little more like a caravan park. There is no attempt to create the architecture of a sustainable community. The proposed buildings are completely alien to St Helena. There is no attempt to emulate traditional building or to use local stone. The project emulates a South African scheme with no roots in St Helena.

The proposed buildings are bungalows on stilts. On the site each of the hundred plus houses will present a front elevation the size of Plantation House. The proposed houses are completely out of scale with the traditions of the island. Walking along the site access roads will mean looking up at two storeys of exposed foundations and sewer pipes. This application will not enhance the island of St Helena.

7) The site is on the saddle of a hill. This means the saw-tooth of buildings the size and height of Plantation as they march down the hill will be visible on the horizon from High Hill, three miles away. This will destroy the natural serenity of the Coastal Zone Post Box walks, contrary to intentions of tourism promotion in the Coastal Zone. It would also be visible from New Ground, two miles in the opposite direction.

8) The entire proposal is ambiguous in its division between residential and tourist houses.

The Heritage Society objects to this application on the above grounds.

We apologise for the delay in forwarding these details owing to the large scale of the application.

The Heritage Society would like to thank the planning office for the opportunity to provide additional information to assist in the assessment of this application and will be happy to provide further help if requested.

Name	Signature	Date
Andy Pearce Director, Heritage Society	ADP	22 June 2020

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Institution	<i>Heritage Society</i>	2020/35	
No Objection		Objection	<i>OBJECTION</i>

Additional Comments / Recommendations / Conditions

The Heritage Society would like to thank the Chief Planning Officer (CPO) for the opportunity to offer advice on this application and the revised EIA.

We would draw you attention to our objection sent to you on 22 June 2020 also attached. As the application remains completely unchanged we again refer you so those objections because we continue to stand by them.

In our view the EIA is completely flawed from its absolute base-line. On page 37 below the EIA states the site is not in the Coastal Zone when it is. At the public meeting held Kingshurst the CPO stated the principle planning policies governing this application are the Coastal Zone policies.

Further down page 37 and 38 the EIA says the development will not sit on the sky-line when it will. In fact in each case highlight in yellow where the EIA states there will be NO effect, the complete opposite is true.

The CPO stated it will be visible from the sea but the EIA says it is uncertain.

How can any of the EIA be taken seriously? How can the EIA be trusted? How can anyone have confidence in anything in this development application?

The Heritage Society strongly objects to this application because it does not comply with basic planning policy of the LDCP and no confidence can be held in the EIA.

Table 6: Screening and Scoping Checklist, in terms of the Procedural Manual for Environmental Impact Assessment

Topic Area	Yes / No / Uncertain	Effect Likely to be Significant or Not Significant?
General		
Is the proposed development site within or close to a 'sensitive area' (i.e. Conservation Area, <u>Greenheartland</u> , <u>Coastal Zone</u> , designated or proposed National Protected Area (NPA))	No	Not Significant.
Will the proposed development Intensify existing uses?	No	Not Significant.
Is the proposed development large scale?	Yes	If mitigation measures as outlined in the EMP be implemented, the effect is likely to be Not Significant.
Biodiversity		
Would it affect the wirebird or its habitat?	Yes	If mitigation measures as outlined in the EMP be implemented, the effect is likely to be Not Significant.
Would it affect endemic and native flora and fauna?	Yes	If mitigation measures as outlined in the EMP be implemented, the effect is likely to be Not Significant.
Would it interfere with other wildlife conservation objectives?	No	Not Significant.
Landscape and Visual Amenity		
Will the development be visually prominent for example <u>would the development sit on the skyline?</u>	No	Not Significant.
<u>Would it affect a landscape of high quality?</u>	No	Not Significant.
<u>Would it affect the views on, to, or the visual amenity of a landscape nearby, particularly a Conservation Area, NPA, and /or <u>Greenheartland</u> or <u>Coastal Zone</u>?</u>	No	Not Significant.
Would it create or cause scarring or erosion of hillsides?	No	Not Significant.
Cultural Heritage and Archaeology		
Would it cause loss, disturbance to or damage to archaeology or heritage features?	No	Not Significant.

Topic Area	Yes / No / Uncertain	Effect Likely to be Significant or Not Significant?
		is likely to be Not Significant.
Would it displace or interfere with local businesses?	No	Not Significant.

Would the development interfere with recreational or tourism uses—land-based and marine based activities?	No	Not Significant.
Would the development generate waste?	Yes	If mitigation measures as outlined in the EMP be implemented, the effect is likely to be Not Significant.
Would the development generate special wastes?	Yes	If mitigation measures as outlined in the EMP be implemented, the effect is likely to be Not Significant.
Would the development disturb potentially contaminated land?	No	Not Significant.
Could the development exacerbate rockfall potential or undermine rock stability?	No	Not Significant.

Marine and Coastal Environment

Would the development affect the marine environment?	No	Not Significant.
Would the development be visible from the coastal waters?	Uncertain	If mitigation measures as outlined in the EMP be implemented, the effect is likely to be Not Significant.
Would the development interfere with navigation?	No	Not Significant.
Would the development indirectly or directly interfere with marine wildlife?	No	Not Significant.
Would the development lead to a change in coastal processes e.g. tidal flows, sediment movements and/or wave patterns?	No	Not Significant.
Would the development affect marine archaeology or geology e.g. the sites of wrecks or other underwater features?	No	Not Significant.

Further assistance

The Heritage Society remains committed to improving the environment of St Helena and would be pleased to offer any further assistance.

Objectives of the Heritage Society

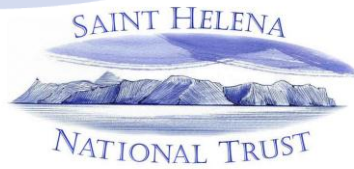
To awaken public interest in and appreciation of the geography, history, natural history, architecture and culture of St. Helena

To promote high standards of planning and architecture in or affecting St. Helena

To secure the preservation, protection, conservation, development and improvement of:

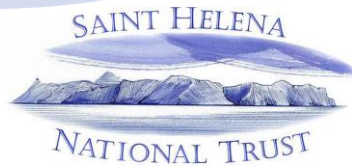
- a) man-made and natural features of historical or public interest in St. Helena*
- b) flora, fauna and the resources of the sea*
- c) wrecks of historical and educational interest*
- d) places of historical interest or outstanding natural beauty or scientific importance.*

Name	Signature	Date
Andy Pearce Chairman, Heritage Society	ADP	9 April 2021



Recommendations for CONSULTATION 2020/35 – **Saint Helena National Trust**

Proposed Comprehensive Development Area with Environmental Impact Assessment to create 150 High-end Residential Homes together with Reception, Tennis Court, Swimming Pool, Managers House and associated ancillary buildings as well as c.8 acres of public country park/picnic/camping area and associated hiking trail as well as log type adventure children's playground and male/female public ablutions with dish wash and associated public car park.



1.0 SUMMARY

Broadly, the comments are similar to those submitted by the Trust regarding the Broad Bottom Environmental Management Programme.

The planning documents presented give no obvious consideration for the special conditions on St Helena, and the document currently gives a very generic approach from South Africa which also includes situations *inappropriate* to St Helena - such as reference to a fire regime. Other than the Wirebird, there are few species mentioned, and therefore actions taken could be very much up for interpretation. Similarly, there are no specifics on the 'training provided' so it is difficult to comment on whether this is adequate.

Furthermore, from the document names and descriptions, it is not clear that the Environmental Impact Assessment is within the Environmental Statement. Within this document, the Impact Assessment table 9.7 (p51 onwards) does not specify the mitigation required to reduce the significance of the work and does not clearly link to the *possible* mitigation measures given in 9.10 (p72). These need specifying more clearly to show what mitigation *will* be undertaken to mitigate all the risks identified. The layout of these elements could be clearer to allow for oversight and monitoring.

2.0 FAUNA

2.1 Wirebird:

While the site is not an Important Wirebird Area such as Broad Bottom, it has Wirebirds recorded on the site for every year since 2015. While 2019 was a particularly low census with only 1 individual recorded, it should be noted that 2019 was a severe drought year. Numbers can fluctuate based on environmental factors and as such it should *not* be assumed that birds will not be present, simply due to the low count in 2019. This is also demonstrated by the 2020 census when seven (7) individuals were recorded. For reference, the past census counts are as follows:

2018 - 9

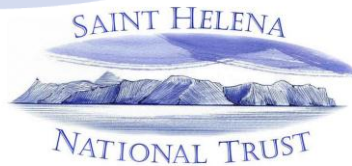
2017 - 10

2016 - 11

2015 - 12

There is also a record of a nest in 2016. Vegetation clearance in some areas for construction, may create more suitable conditions for the Wirebird, therefore there needs to be a plan in place for checking for nests, a procedure for if a nest is found, and a clear training provision on the need to conserve and protect the species, in line with the Environmental Protection Ordinance (2016).

There is no mention of the Wirebird at all in the Environmental Management Programme beyond a reference to the Environmental Protection Ordinance (2016) on page 17.



As with the Wirebird Habitat Management Plan for Broad Bottom, a Wirebird plan needs to be in place before work on site begins, to provide clear guidance for actions and protection and a resource for contractors to abide by when dealing with any Wirebirds that may be found on site, particularly during breeding season.

This should include consideration of times of year for development work and potential impacts on the species. Temporary restrictions for protecting nests that are found also needs describing. This would then also inform any training provided for contractors.

2.2. Donkeys

Section 8.3.3 of the Environmental Statement indicated consultation with a Donkey Society should be undertaken for the effective management/removal of the donkey's onsite. There is no mention of donkeys in the Environmental Management Programme.

Any interaction or impact on the donkey population would require involvement of appropriate organisations and departments and requires a clear plan. However, it is unlikely removal will be practical or effective if the site is not being enclosed, and as feral donkeys are unused to interaction with humans. It does need to be clear whether access to the site by donkeys and any potential impacts (e.g. eating planted vegetation) would be considered problematic. If so, then there would need to be proposed actions to reduce or prevent impacts. There also needs to be evaluation of whether there would be any restrictions or impacts on the population due to construction/operation of the development which may impact their welfare.

2.3 Other Fauna

Invertebrates have not been assessed, but the assemblage could include endemic species and there are numerous anecdotal reports of bees in this area which is worth investigating given the island's honey production. Invertebrates, particularly beetles, are also vital food for the Wirebird. With regards to the Tiger worm (*Eisenia Fetida*) referred to in the Waste Water Treatment document, the only condition should be that these worms are not imported.

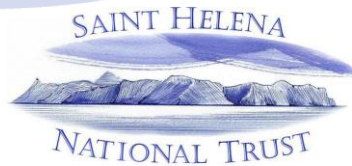
While there is reference within the Impact Table to the loss of integrity of ecologically sensitive and important vegetation units which should not be jeopardized 'when expressed as vertebrate habitat', this does not account for vegetation (including mosses and lichens) which may be valuable habitat for endemic invertebrates and therefore this should also be considered.

2.4 Recommendations

A Wirebird Habitat Management Plan, including actions for the species itself (e.g. if a nest is found, if a wirebird is found, etc), should be in place, in order to protect the species throughout the development process.

A clear procedure for management of donkeys would also be helpful, which would also be useful for prospective owners/occupants to be aware of, to mitigate any future conflict issues.

Regarding the tiger worms, we recommend collecting and breeding from a population already present on island.



3.0 FLORA

3.1 Barn Fern

There is reference to the endemic Barn Fern (*Ceterach haughtonii*), lichens and mosses on the site. This does not specify where this fern occurs, other than '*occurring between cliffs and exposed rock formations present on the middle and lower reaches of the Horse Pasture Area*'. This does not provide enough detail to enable the appropriate protection of these areas and there is no reference to this species in the Environmental Management Programme beyond a reference to the Environmental Protection Ordinance (2016) on page 17 where it states that these, along with the Wirebird, may be disturbed as part of the proposed development.

3.2 Crevice Fern

As well as the Barn Fern (CR) there is also a native fern, the native Crevice Fern (*Cheilanthes multifida*), which grows in the same/similar habitat and could be present on Horse Pasture but would be most visible in winter or following rain (Lambdon, 2012). Disturbance to these areas will need to be taken into account and where possible buffer zones included.

3.3. Other Flora

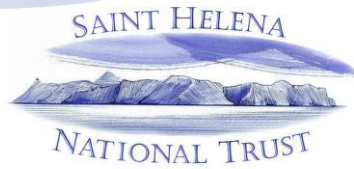
There is reference to indigenous, exotic and noxious plant species. However, although it is recognised that noxious plant species should be removed, there are no species specific to St Helena mentioned in the EMP, and therefore it is difficult to see how species will be prioritised. This needs clarification to ensure appropriate prioritisation and actions. This should include recognition of the value of mosses and lichens for the invertebrate fauna.

There is also mention of indigenous plants being *installed*, but again no reference to what these may be. As with Broad Bottom, any endemic plants installed would need adequate maintenance and protection and should similarly be specified to aid identification of suitable plants to install and monitor, along with requirements under the EPO.

Reference to fire regimes is not appropriate for St Helena, only consideration of fire suppression if necessary.

3.4 Recommendation

Identification and prioritisation of plant species for control, as well as preservation, should be identified (e.g. within an annex), to make it clear to contractors and the general public what the development targets are and to demonstrate more specifically the benefits that will be gained from actions on this site. Sensitive construction measures should also be considered, such as, avoiding soil crust disturbance and including invasive plant control measures.



4.0 Built and Cultural Heritage

4.1 Stone Wall

The stone wall is mentioned within the Environmental Statement, with reference to this being restored towards the end of the development. However, this is not included in the Environmental Management Programme and there is no reference to doing this in collaboration/consultation with appropriate organisations on St Helena to ensure this is approved and done appropriately and sensitively.

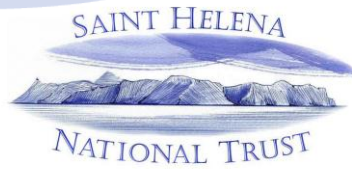
4.2 Water Hole

There is also a water hole which is not mentioned in either document. It is a small natural hollow, covered with a thick stone slab with 'WATER' carved into it. There are also broken 19th century bottles around this area. This is included in the Historic Environment Record and should be located and protected. This is linked with the Boer prisoners, but may also have been used by locals. This information has been provided by the Museum of St Helena. It is described as very hard to locate and small enough to be destroyed.



4.3 Community Access

On page 14 of the Environmental Statement it is stated that existing trails will be improved to increase access to all areas of the site along with specific viewpoints - does this also include fishing roads? Would access to them be granted freely? The Trust is mindful of the significant cultural importance of this site, which is used by many Saints for recreational purposes and as such ask if there should be a cultural/social impact assessment conducted?



4.4 Recommendation

Ensure an appropriate survey is undertaken to identify and demarcate the unique water hole to ensure protection. We believe that Stedson Stroud knows the exact location. The appropriate restoration of the wall also needs further consideration. Consideration should be given for a Social Impact Assessment due to the reduction of camping area and potential impacts on community access.

5.0 OVERALL COMMENTS

Generally the references and management actions for flora and fauna need to be more tailored to the St Helena context to show proper understanding and to ensure a sustainable approach is undertaken.

Conservation of the Wirebird in particular should be prioritised and approved by relevant persons to ensure sustainable and appropriate actions are taken before (and while) work commences.

There also needs to be more specific detail within the Environmental Management Programme, to ensure that actions undertaken are suitable, can be easily monitored and will benefit the heritage aspects of the site.

Within the Planning and Design statement, there is also reference to a desalination plant in Lemon Valley, subject to relevant approvals and only if needed. However, this is not referred to at all in the Environmental Statement. Given the potential impacts of such a structure and the huge cultural and environmental significance of Lemon valley, we believe more detailed information on this aspect of the proposal needs to be made publicly available prior to any works commencing on the desalination plant.

While the Trusts' response has been heavily focused on the environment and built heritage of this area, we also recommend that a Social Impact Assessment should be conducted to fully appraise the potential cultural and social impacts related to this large proposal (e.g. large scale loss of the traditional camping area etc.).

We would finally recommend that there should be greater acknowledgement of the need to involve appropriate on-island organisations to ensure actions regarding heritage and flora and fauna are suitable.

Planning Section - Development Application Consultation Form

To view Applications and Drawings: Visit at Planning Office Essex House

For more Information Contact Tel: 22270 or Email: shane.williams@sainthelena.gov.sh

Application No.	2020/35		Please Reply by:		4 pm on 9 April 2021	
Type of Application	Full Application	✓	Outline Application			
Description	Proposed Comprehensive Development Area with Revised Environmental Impact Assessment and Environmental Management Programme to create 150 High-end Residential Homes together with Reception, Tennis Court, Swimming Pool, Managers House and associated ancillary buildings as well as c.8 acres of public country park/picnic/camping area and associated hiking trail as well as log type adventure children's playground and male/female public ablutions with dish wash and associated public car park.					
Applicant	Saint Helena Developments Limited					
Parcel	TH0185 and 0186 Block 1					
Location	Horse Pasture					
Co-ordinates	E: 205382.734			N: 8234377.803		
Conservation Area						
LDGP Development Zone	Intermediate		Coastal	✓	Green Heartland	

Additional Info:

Please be advised that the documents submitted can be found on the applicant's company website for viewing. <https://tradewindsplc.com/ocean-village/> (Documents 3 and 4). However, if you would like to have a set then this can be arranged by having it copied to your flash stick.

Institution		2020/35																					
No Objection		Objection	Objection																				
Additional Comments / Recommendations / Conditions																							
<p>It is the mission of the St Helena National Trust to champion our built, natural and cultural heritage. We object to this development application for the following six reasons. Our comments are related to the quality of the EIA and EMP documents, specifically the impacts/risks that the proposed development may have on our heritage.</p> <p><u>1. The EIA and EMP do not recognise the full importance of the wirebird at Horse Pasture</u></p> <p>In our previous response to this development we recommended that a Wirebird Habitat Management Plan, including management actions for the species itself (e.g. if a nest is found, if a wirebird is found, etc), should be in place, in order to protect the species throughout the construction process. The EMP has adequate controls in place for wirebirds; however, we believe the development should aim to increase biodiversity rather than just protect what is there.</p> <p>In addition, the EIA fails to acknowledge the drought in 2019 which contributed to low wirebird numbers and it ignores recent census results by the St Helena National Trust that shows the area is good habitat for wirebirds and that the population is increasing since 2019. We recorded 7 birds in 2020 and 8 birds in 2021.</p> <p>The EMP also states that feral cats will be trapped and relocated. We recommend that feral cats are dispatched humanely so that they cannot continue to be a threat to wirebirds.</p> <p>The below graph shows wirebird population changes at Horse Pasture from 2013 to 2021:</p> <div><p>Horse Pasture Wirebird Population (2013 - 2021)</p><table><thead><tr><th>Year</th><th>Population</th></tr></thead><tbody><tr><td>2013</td><td>22</td></tr><tr><td>2014</td><td>18</td></tr><tr><td>2015</td><td>11</td></tr><tr><td>2016</td><td>9</td></tr><tr><td>2017</td><td>10</td></tr><tr><td>2018</td><td>9</td></tr><tr><td>2019</td><td>1</td></tr><tr><td>2020</td><td>7</td></tr><tr><td>2021</td><td>7</td></tr></tbody></table></div> <p><u>2. Invertebrates are severely under-represented in the EIA and EMP</u></p> <p>The report by van Neel (2020) recommended that an invertebrate baseline be established in conjunction with the St Helena National Trust. This baseline has not been established. The report by Malan (2021) recorded four invertebrate species, only one species of conservation significance. The survey was woefully inadequate to establish a baseline of invertebrate species and as such, the EIA has not appropriately assessed the risk the development may have on invertebrates. The <i>Environmental Protection Ordinance 2016</i> lists 285 invertebrate species as protected on St Helena and our records indicate that a significant number of those species may be present on site. We recommend that a full invertebrate survey is conducted before construction.</p>				Year	Population	2013	22	2014	18	2015	11	2016	9	2017	10	2018	9	2019	1	2020	7	2021	7
Year	Population																						
2013	22																						
2014	18																						
2015	11																						
2016	9																						
2017	10																						
2018	9																						
2019	1																						
2020	7																						
2021	7																						

We also note that there is no mention of tiger worms in the EIA or EMP. According to previous environmental documents for the development, tiger worms had been intended to be used in waste water management. Has this plan changed? We recommend collecting and breeding tiger worms from a local population rather than importing them.

3. Lack of information about sewerage management

Pollution from leakages in sewerage pipes is mentioned as a risk to the environment. We note that the EIA mentions that non-mechanical “Biolytic Digester” systems will be used onsite. However, we were unable to determine if sewerage will be effectively treated on site, or if it will be disposed of at sea. If disposed at sea, there is a further risk of pollution to marine environments which has not been documented in the EIA and which would be contrary to the IUCN Cat VI (sustainable use only) marine protected area.

4. Vegetation not adequately managed in EMP

The EMP notes that a Plant Rescue Plan will be implemented using a detailed list of GPS locations of plants of importance that are present on the project site. We could not find the Plant Rescue Plan or the detailed list of GPS locations. We recommend that this work should be completed as soon as possible.

There is also a discrepancy between reports about barn fern. The report by van Neel (2020) mentioned barn fern was likely to be present at the site. The report by Malan (2021) did not record barn fern. Barn fern is protected by law so we recommend a further flora survey to determine if the species – and other species of conservation concern – are truly present on site.

5. Heritage is not adequately managed in the EMP

We commend that the dry-stone wall will be restored, and that the wall and waterhole will have buffer zones around them to minimise disturbance from construction. However, the EMP does not specify the distance of the buffer zone. The waterhole is included in the St Helena Historic Environment Record and should be located and protected. It is linked with the Boer prisoners and may also have been used by locals. The waterhole is in danger of being damaged as it is not very obvious. In addition, the EMP does not have any management actions for the two ruins that were noted in the EIA.


6. Cultural and social impacts not fully addressed in EIA and EMP

We note in the executive summary of the report by Malan (2021) that information regarding Social Impact Assessment requirements were to be collected; however, we can find no evidence of such an assessment in the report or the EIA or EMP. We believe that consideration should be given for a cultural and social impact assessment due to the changes to the camping area and public access to traditional fishing grounds.

We recognise the camping site is privately owned; however, camping at Horse Pasture is an important cultural activity and has occurred there for many years so any change caused by the development is a valid consideration. We also note the ‘improvements’ to the camping site are described in the EIA as being positive. However, the total available camping space will be significantly reduced.

We note that access is mentioned and improvements to access are noted in general. However, there is no mention of access to the traditional fishing grounds below Horse Pasture. The track from the campsite is regularly used to access the lower parts of Horse Pasture. We note that vehicular access will be limited to the entrance of the proposed development. We hope that access is not restricted for fishers who wish to visit the culturally important fishing grounds and that the public will have access through the site with their own vehicles.

We also recommend that there should be greater acknowledgement of the need to involve appropriate on-island organisations to ensure actions regarding heritage and flora and fauna are suitable.

Name	Signature	Date
Mike Jervois Director, St Helena National Trust		9 April 2021