ANNEX D

"TRADE WINDS DEVELOPMENT APPLICATION

The Land Development Control Authority (LDCA) discussed at length Trade Winds Development Application at its meeting on 3 May, 2021. While the LDCA welcomed the Development Application which it was felt would provide an opportunity for investment in the Island and ultimately provide much needed economic growth, there were a number of concerns and issues that required to be addressed. The level of detail provided in the Application is insufficient to assess how the various elements of the proposal will be delivered and what the potential impact would be on the Island's resources and its environment impact in both the development area and for miles around the development area.

The LDCA carried out a site visit during which members identified very significant differences between the proposed site layout and the site topography.

The concerns and issues the LDCA have are summarised as follows:

- Although the EIA Report is a second attempt by the Developer, an assessment is still required to be incorporated in the Report with regard to the local environment and the potential impact on the historic assets in the area. It was recommended by the Chief Environmental Officer that this could be done by an "Addendum" to the EIA Report. This is fine, except that it should be done before any development approval is given.

Detailed Plans for the internal road layout are not included in the project proposal. During the site visit accessibility across the development area was raised as a major concern by the members. Due to the topography of the site, any roads (including ones suitable for electric golf carts) will require significant construction work, yet no detailed plans have been submitted. In order to meet the standards for 'Full Development Permission' accurate plans including cross sections should be required.

No details have been as to how emergency vehicles will access the building within the development area have been provided.

Housing on the sites as shown in the site layout plan would require some of the houses to be on "stilts" over 20m high. This would make the buildings visible for miles either side which is against several LDCP policies.

There are no detailed plans for any of the commercial or service building with the development and therefore their compliance with the LDCP and building regulations can't be checked.

There are no clear plans or details which meet "Water Supply Requirements" – it is more of "we will get it there somehow approach".

There are no details of how the water will be connected either externally on site or how it will be connected internally. In order to meet LDCP W4, there would need to be significant trenching works which are not in the Development Application. Furthermore, the Developer has made no contact with Connect St Helena Ltd with regard to the water supply in the area. If the Dam is to be provided, where will it be and where will be the source of water?

There is a lack of information with regard to the sewerage system across the development site, its disposal and output discharge.

Attention is drawn to LDCP SD4 and SD7.

No details of telecommunications infrastructure have been supplied.

No details about disabled access to facilities have been provided.

There should be an assessment of development phases – a detailed design of each phase of the development showing relationship of buildings and building plots.

In LDCP NH3 it states ""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". No firm details have been supplied and the EIA is inadequate.

No percolation tests have been carried out – each building or soakaway, if there are to be several communal ones, each would require one. In the case of the commercial building no details have been supplied, if it is planned for the houses to use a self-contained system to treat their effluent, but no details have been provided.

LDCP SW4 states Commercial and community development and development in Comprehensive Development Areas and Coastal Village Areas will be permitted only where the development includes appropriate provision for solid waste storage and collection. The Developer has only provided very limited information in this respect. More detailed information required.

The LDCA is of the view that more detailed designs and information are required for an application for full development permission.

The LDCA recommendation to the Governor-in-Council that the application for Full Development permission be denied.

We would, however, fully support the application at its current level of detail if it was for "Outline Development Approval". Our recommendation is that the applicant resubmits the application for Outline Development approval and then applies for full development permission in smaller sections, one or two phases at a time for example.

If Governor-in-Council decide to approve full Development Approval, the LDCA would like any major conditions to be referred to the Authority for approval.