

## Open Agenda

Copy No:

No: 34/2021

### Memorandum for Executive Council

#### SUBJECT

**Development Application: Proposed Development of Trade Winds Ocean Village Comprehensive Development Area, Horse Pasture, Thompson's Hill**

Memorandum by the Chief Secretary

#### ADVICE SOUGHT

1. **Executive Council is asked to consider and advise whether Full Development Permission should be granted, with Conditions, for the Proposed Development of Trade Winds Ocean Village Comprehensive Development Area at Horse Pasture, Thompson's Hill.**

#### BACKGROUND & CONSIDERATIONS

#### **CONSIDERATION OF DEVELOPMENT APPLICATION BY EXECUTIVE COUNCIL**

2. In accordance with the directions issued by the Governor-in-Council to the Chief Planning Officer on 17 April 2014 under Section 23(1) of the Land Planning and Development Control (LPDC) Ordinance, 2013, the Chief Planning Officer is required to report to him on all applications for Development Permission of a site (or a group of two or more sites in the same vicinity) which exceeds (or exceed in aggregate) five acres in area.

#### **THE DEVELOPMENT PROPOSAL**

3. The development application site is located on the north western side of the Island adjacent to Lemon Valley on what is historically known as the "Horse Pasture" site, (see the LDCA Report at Annex A and Diagrams 3 and 5 in Annex B). The site is approximately 1km north of Head O'Wain and is just north of the area allocated for comprehensive development at Burnt Rock. The development application covers a total area of 105 acres (42.5 hectares) of open land with approximately five acres of land that is described as pasture land. This part of the site is relatively flat and is used for purposes of camping and is identified for recreation and leisure use in the Land Development Control Plan 2012 (LDCA). Further details of the proposal and assessment of the area are set out in Section B of the LDCA Report at Annex A.

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4. The development proposal comprises the following:
  - i. Housing Units;
  - ii. Communal facilities for residents;
  - iii. Service area;
  - iv. Stores and maintenance and operations facility;
  - v. Saints communal facility;
  - vi. Nature walks;
  - vii. Existing stone wall restoration.
  
5. The development comprises a mix of uses centred on recreation, leisure and the tourism industry that has the opportunity to promote wider economic growth on the Island (see Section C of the LDCA Report and Diagram 5 in Annex B). The Summary of the proposed development includes the following:

### **Recreation, Leisure and Community Facilities**

6. The existing camping and picnic facilities will be relocated south-west of the current area, however it will still be the most accessible part of development area for the St Helena community.

### **Residential Development**

7. This comprises 150 units comprising of 2, 3 and 4 bedroom units of two design types for each unit size.
8. Building construction will utilise the slope on an elevated position supported on concrete and timber piles.
9. Reference to the supply of energy, water and the waste water treatment system for the development is included in Section C of the LDCA Report.
10. The proposed road system to support the development, including details of offsite highway improvements and upgrades is referenced at Section C of the LDCA Report.

## **RATIONALE BEHIND THE DEVELOPMENT PROPOSAL**

11. The rationale for the development is to deliver a standalone and self-contained complex with anticipated improvements to an area of open land at Horse Pasture.
  
12. The principal objective of the proposed development is to cater for a high value tourism facility encouraging international investors to own property on St Helena Island through single or fractional ownership, with the ability to place wholly owned properties into a 'rental pool' to be released through the hotel

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booking management for short-term tourist related lets.

13. The development is intended to be self-sustainable as far as practically possible in its functionality and operation and will seek to utilise renewable energy and green technologies where possible. The construction methodology of the development intends to make use of a well-established and proven prefabricated timber building system which will be imported and assembled on site. The applicant has previously constructed a pilot project (show house) in Sapper Way which is in full compliance with the prescribed regulatory requirements.
14. The Sustainable Economic Development Plan (SEDP) for St Helena sets out the strategic vision for the Island to 'achieve development which is economically, environmentally and socially sustainable by increasing standards of living and quality of life; not relying on aid payments from the UK in the longer term; whilst affording to maintain the Island's infrastructure; achieve more money coming into St Helena than going out and sustain and improve St Helena's natural resources for this generation and the next.'
15. To achieve this vision, the SEDP sets a goal to improve infrastructure by 'using tax revenue and other funding streams for investments to improve health, education, water, electricity, transport, risk management and other infrastructure'.
16. Development and investment in the local economy is important to the economic prosperity of the Island and the development of a tourism industry. Development of tourism accommodation is considered an important economic objective for the Island and to optimise its location for international visitors to enjoy the leisure and recreation and sample the quality nature and historic environment.
17. The introduction of this tourism complex and local facilities could be assumed to fall within the wider vision of the SEDP and 10-Year Plan for encouraging future investment in the infrastructure that will create employment opportunities for the local people.
18. The level of investment outlined in this proposed development and the potential to improve and upgrade some of the local community infrastructure also support the goals in the 10-Year Plan (2017-2027) including developing St Helena industry. Further, this development aligns with the general spirit of the SEDP in encouraging international investment that also improves local infrastructure as a necessary component of

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‘development which is economically, environmentally and socially sustainable’.

### **PLANNING HISTORY FOR THE DEVELOPMENT PROPOSAL**

19. The company promoting this development has been engaged with development proposals on this Island over a number of years, although due to the unfavourable economic condition and issues of infrequent air access, the delivery and implementation of the proposals have not been progressed much beyond the development permissions that have been granted. The company currently has development permission for a Golf Course Hotel Resort at Broad Bottom that was granted development permission in 2015 and this development permission was renewed in April 2020 by the Governor-in-Council (ref: 31/2020).
20. The current proposals for the Horse Pasture site has been in the pipeline for a while and the applicant company has engaged with the Planning Service, other Government Sections and stakeholders over the past few years. In January 2020, the applicant came to the Island to promote the development and engage with the local community. He organised public meetings to explain the proposal and answer questions on the issues in respect of the development.
21. Given the significant global events and shift in economic and travel conditions that have occurred since January 2020, this may have an impact on the timeline for implementation of the development proposal.

### **PUBLIC CONSULTATION**

22. The applicant has engaged with the local community and stakeholders in the formulation of the development proposal. The Planning Service has also consulted with the local community and stakeholders on the proposed development. This has included consultation on the EIA Report in compliance with EIA Regulations.
23. A full analysis of stakeholder responses is set out in Section D of the LDCA Report and copies of the stakeholders response is included in Annex C.

### **ENVIRONMENTAL IMPACT ASSESSMENT**

24. In compliance with the Environmental Impact Assessment Regulations, the development application was accompanied by an Environmental Impact Assessment (EIA) Report reviewing

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the potential and perceived impact of the proposed development on the general environment of the area.

25. The EIA has assessed a number of environmental factors and activities for the proposed development during construction and post construction when the use will be operational. In total 43 environmental factors and activities have been analysed for the construction stage and 25 for the post construction assessment. Full assessment of the EIA Report is set out in Section E of the LDCA Report.
26. The Chief Environment Officer (CEO) reviewed the original EIA Report and raised a number of issues concerning its content, relevant to St Helena's EIA Regulations, locally based information, baseline information and the form of assessment. The issues raised, together with those of the other stakeholders were conveyed to the applicant and a revised EIA report was submitted in support of the proposed development. The general view of the CEO on the revised EIA Report is that some of the issues raised previously have been addressed, however concerns still remain due to some issues remaining outstanding. These issues are discussed in Section E of the LDCA Report in Annex A and a brief summary is set out as follows:
  - i. The EIA report is not structured to show a clear process of identification of impacts, establishing of baselines, assessment of impacts, identification of mitigation measures, assessment of impacts after proposed mitigation and monitoring and reporting;
  - ii. A checklist has been used to identify relevant environmental issues. The following have not been considered including visibility from the sea and coastal areas, potential for excavations to cause scarring and erosion, undermining of rock stability and potential for rockfall and landslides, new access requirements on to and within the site, and impact on recreational users of the area (campers, picnickers, fishermen);
  - iii. Some groups of people have been omitted from the Interested and Affected Parties, such as adjacent landowners and residents who will be able to see the development from their properties and those affected by an increase in traffic in the area ;
  - iv. A quantified assessment of impacts has been identified and there is a clear criteria for the impact assessment and issues are rated before and after mitigation;
  - v. The section on invertebrates is an overview of invertebrates found on the Island but it is not clear as to

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- the relevance to the development area;
- vi. The methodology lacks detail, reference to desk study, not clear how much information was available for this area, literature cited gives no references to actual studies on the development site or maps of the area showing survey points or areas covered and the survey was done over a short period during the dry season only;
  - vii. There is a good description of flora present, but species are not mapped either generally or in relation to the actual proposed development;
  - viii. The invertebrate assessment is weak as no sampling has been undertaken or reference made to other surveys within similar habitats, further information on the blushing snail and where it was found would be useful;
  - ix. Cumulative impacts are considered but the section is brief and further impacts could have been identified and discussed;
  - x. Mitigation Measures includes baseline information and the Wirebird Management Guidelines should have been produced in consultation with the SHNT to ensure advice is consistent for this species;
  - xi. Under the recommendations for seabirds, there is a need to minimise the impact of lighting and all lighting to be of a low pollution design, to minimise light pollution and impact on biodiversity. The development will need to comply with dark skies requirements and the legislation (still in draft form);
  - xii. Monitoring and Reporting Procedures are not included in the EIA report but covered in a separate document, Environmental Management Programme;
  - xiii. An outline of alternatives considered is included with reasons for choices. No alternative sites were considered but the justification for this is acceptable;
  - xiv. A Non-Technical Summary is included as a quick reference for a lay person with Tables 1 and 2: *Summary of Construction Impacts and Summary of Operational Impacts*, respectively. However the tables should be clearer, stating what Ext, Dur, Mag/ Pro means and why there are 2 sets of columns;
  - xv. There is a brief reference to the assumptions made, but there is no reference made to constraints and the point stated on gaps in knowledge is unclear.

27. The CEO concludes that the EIA report should be of a quality and with a level of detail to enable the environmental impact of a proposed development to be adequately assessed by the determining body. Whilst the EIA report does include an

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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 not been achieved. A full ecological baseline should be established with species of significance clearly mapped on to the development site plan so that the impact of the proposed development can be clearly assessed.

28. The CEO recommends that as this is the second attempt of the EIA report, the inadequacies of this EIA Report should be addressed by way of an Addendum to the EIA report rather than a rewrite and resubmission of the entire EIA report.

## **POSSIBLE SOCIAL BENEFITS OF THE DEVELOPMENT**

29. There are possible social benefits arising from the development application, in that new community facilities will be provided in the relocated area with ablution and wash facilities, BBQ pits and a new equipped play area to be provided. Training and employment opportunities will arise during the construction and post construction when the development is in operation and with the management and servicing of the development. Whilst the applicant has not qualified the level of job creation arising from the development, it is inevitable that there will be jobs created for businesses that already operate on the Island.

## **ASSESSMENT OF DEVELOPMENT PROPOSAL AGAINST PLANNING POLICY**

30. **The Land Development Control Plan 2012:** The relevant Land Development Control Plan (LDCP) policies that are applicable in respect of this development include the following:
- i. Coastal Zone Primary Policy CZ.1, Policy CZ.3
  - ii. Social Infrastructure SI.1(b), SI.11 and SI.12
  - iii. Water Supplies Policy W2
  - iv. Sewage, storm and Drainage: Policies SD1(b, c) and SD7
  - v. Road and Transport Policies: RT1(c)(d), RT7
  - vi. Employment Premises EP.1, EP.3 and EP.4
31. The LDCP policies identified for the assessment provides direct and indirect support in principle and for details of the proposed development, and for this reason the assessment must be for all policies where applicable. The principle policies for the assessment of the proposed development is CZ.1, CZ.3, and SI1(b). Full details of this policy analysis is included in Section

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D of the LDCA Report.

### **CONSIDERATION OF THE APPLICATION BY THE LAND DEVELOPMENT CONTROL AUTHORITY (LDCA)**

32. At their 3 May 2021 meeting the Land Development Control Authority (LDCA) considered the report on the development application seeking FULL Development Permission for the Proposed Development of Trade Winds Ocean Village, Comprehensive Development Area at Horse Pasture, Thompson's Hill (see Diagrams 1 and 2 in Annex B). The Authority whilst welcoming and supporting the development proposal in principle, however has raised a number of issues and concerns and these relate to the level of information and design details that have been provided by the applicant for consideration as a Full Development Application. A copy of the Authority's comments are included as Annex D.
33. The additional information required through the issues raised by the LDCA are summarised as follows:
- i. An assessment of the local environment and more information and assessment to be included in the EIA report, as well as the potential impact on the historic assets in the area;
  - ii. A detailed design of the internal roads, general road layout and wider accessibility across the development area, with plans showing a cross-section across the site and gradients;
  - iii. The provision of water resources to meet the potential level of demand by the development, if the dam is to be provided as stated where will it be and from where will the source of water be secured;
  - iv. The sewage system details across the development site, how will this be provided across the site, its disposal and output discharge;
  - v. An assessment of the application's development phases: detailed design of each phase of the development showing relation of buildings and building plots.
34. In view of the above issues and concerns raised, the LDCA would advise the Governor-in-Council that this development application should only be granted Permission for an Outline Development as the Authority considers that the level of detail and design information provided is not in line with the level of information and design details expected of a development Application seeking Full Development Permission.

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### CONCLUSION AND RECOMMENDATION

35. The development application for the Trade Winds Ocean Village development presents a number of challenging issues which have been discussed in detail and this also includes those raised by the stakeholders on the level of detail and in some respects, the lack of detail in the proposed development application.
36. The proposed development will have an effect on the ecology of the area because this is a greenfield site which has had little development activity in recent years other than through camping, picnic and trekking across these grounds.
37. The assessment of the EIA Report has highlighted the omission of areas of environmental information and the need for undertaking further survey of the local ecology with improved recording and mapping of the findings. Assessment of the potential impact arising from the proposed development on the number of environmental factors and activities is comprehensive for the construction stage of the development and for the operation as a tourism development and community recreation and leisure facility. There are a number of factors that have considerable adverse impact on the local environment, however with the appropriate level of mitigation proposed there is reduction in the adverse impact.
38. In view of the conclusion of the CEO that provision of an Addendum to the EIA Report which meets all of the environmental information requirements for the issues raised would be acceptable, together with the level of mitigation proposed through the Application's Environmental Management Plan, the environmental impact of the proposed development is acceptable.
39. EIA issues should be addressed as a Planning Condition for granting planning consent. Therefore, to mitigate EIA concerns detailed plans of each phase of the development should be influenced by an ecological assessment i.e. the Planning Condition would therefore need to reflect that a baseline assessment and additional information for each area should be completed prior to the detailed design of that area.
40. The level of detail provided by the applicant on the layout of the development is adequate to make a decision on the proposed development and to assess how it will be delivered and the potential impact associated with it.

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41. The Applicant should be required to provide the additional level of detail with regards to the provision of water, adequacy of the sewage system and disposal and discharge of waste water, construction of the primary services and access roads within the development site and delivery of each phase of the development. These details may be subject to some alteration/amendment when more detailed assessment of the site is undertaken and these will need to be provided and approved by Authority before development commences. It is therefore considered that Planning Conditions requesting approval of these details would be the most appropriate way to deal with the volume of development expected.
42. The continued access to the traditional rock fishing grounds below the development site can be ensured through imposing a Planning Condition to preserve some pathways and the creation of new access. Similarly, disabled access to the building units can be provided for through a Planning Condition.
43. The decision of the Applicant on the timing to invest will be dependent upon global economic conditions. The land is privately owned and the current owners or any potential purchaser can decide to do nothing if the market conditions do not encourage development. It is therefore not a situation which the planning process can control. Grant of development permission at least creates an opportunity for the Applicant to raise the finances necessary to enable the development to proceed.
44. In principle, the proposed development is supported by the various LDCA policies that have been set out in the LDCA Report. In view of the assessment of the proposed development against these planning policies and whilst giving consideration to the representation made by the public and various stakeholders, as well as the views expressed by the LDCA, it is considered that there is sufficient information and level of design detail provided through the development application to be able to assess the potential impact of the proposed development. This assessment acknowledges and concludes that additional design details and supporting information should be provided for the discharge of the various recommended Planning Conditions, to ensure that there is an adequate provision of services and facilities to support the development without placing undue strain on the existing services provided by our Utilities Company.
45. The purpose of recommending approval with Planning Conditions is to ensure that notwithstanding the details that

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have already been submitted with the application for consideration, additional environmental information, design details, potential impact at the point of construction, energy, water and sewerage needs to be provided by the Applicant to ensure they meet with the principle objectives agreed. The information provided thus far is considered to be sufficient to grant Full Development Permission with a number of Planning Conditions, should the Governor-in-Council be minded to grant approval.

46. The application as submitted is for Full Development Permission and Executive Council, sitting as the Planning Authority is required to consider the development application as it is presented; as a Full Development Application. The applicant was advised of the LDCA's concerns and the applicant has advised that he does not wish to amend the development application with respect to the type of planning permission sought.

47. Notwithstanding the views expressed by the LDCA and the representation made by the stakeholders and the public, it is recommended that the Governor-in-Council grants Full Development Permission subject to the Conditions as set out in Section E of the LDCA Report attached as Annex A to this Memorandum.

### FINANCIAL IMPLICATIONS

48. There are no financial implications arising for the St Helena Government from the application for development, as financing of the development will be the responsibility of the Applicant.

### ECONOMIC IMPLICATIONS

49. The development application does not include detailed information that would be sufficient to make conclusions about the economic impact of the development but instead refers generally to the 'extensive research' the developer has completed regarding opportunities for expanding the economy of St Helena.

50. The proposed development could facilitate private investment on the Island and provide future growth and economic prosperity if there is sufficient demand for the product being developed. The focus of the development is on attracting high-value tourists through the provision of 'upmarket' accommodation. This is not consistent with the recommendation of the SEPD for developing affordable accommodation to attract adventure travellers and yachties. The development application does not provide sufficient evidence to draw conclusions regarding the expected demand for the proposed units either now or in the foreseeable future.

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51. This development could support growth in the tourism sector which is an important economic objective for the Island. It is the developer's view that the development will optimise the location for international visitors to enjoy the leisure and recreation and sample the quality nature and historic environment. The development application does not provide sufficient evidence to evaluate this conclusion.
52. If it proceeds using local contractors, the construction of this development would create employment opportunities for local people. It is unclear how many local workers would be employed and the EIA refers to the potential risk of increased crime from an influx of workers which implies the intention to use at least some labour from overseas rather than St Helenian workers. If successful, the operation of this development would also create hospitality jobs but, again, there is not sufficient evidence provided to draw conclusions about how many jobs would be created and whether these would be staffed locally.
53. If the development were to lead to an increased number of visitors, this would contribute indirectly to broader economic growth, the development application does not provide sufficient evidence to evaluate this conclusion.
54. Should the development go ahead, delivery and implementation of the development would promote growth in the construction sector if local contractors are used and would contribute toward economic growth and prosperity if it attracts new visitors to the Island. It is the developer's view that it would be a draw to tourists because the facilities provided would far exceed what is currently available. The development application does not provide sufficient evidence to evaluate this conclusion.
55. It should be noted that the development is conditional on 'meaningful international air access'. Prior to 2020, the predictions for air access growth is moderate year-on-year growth based on travel from Southern Africa, particularly in peak season. Currently, it is unclear when regular commercial flights to St Helena will resume and, when they do, how long it will take for demand to return to a level of demand that would support even weekly flights from South Africa. The development application does not provide sufficient evidence to determine whether the developer has reassessed any aspects of the development in light of the COVID-19 global pandemic and the impacts on international travel.
56. Land is a scarce resource on St Helena and should be mobilised for development wherever possible. However, by

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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. It is also unclear whether the development as proposed meets the needs of visitors to St Helena given what has been learned since air access has been operational.

57. Given the current global environment, without an 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 this planning permission if at all.

58. A development of this size may be more palatable in the longer term if St Helena's visitor numbers rebounded quickly to pre-pandemic levels and continued to increase. If the proposed development is felt to be consistent with the type and number of tourist accommodation the Island needs, 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

59. The development proposal and its delivery is in compliance with the Investment Policy Principles. The implementation of the development could create employment opportunities if local contractors are used and has potential for further economic growth on the Island if it were to lead to an increased number of tourists and visitors.

60. The following Investment Policy principles apply:

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

### PUBLIC/SOCIAL IMPACT

61. There is no social impact assessment (SIA) accompanying the planning application, even though it is the first proposed large scale tourism development on the Island. An SIA is not a requirement for planning permission. The EIA provides brief coverage of social issues such as impact on employment and accessibility improvement across the site.

62. While there is information on construction jobs to be created, there is nothing on jobs to be created once the development starts operating.

63. The development will not be gated and will continue to be

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private land with public access allocated for a public camp site and a 1km 'hiking' trail. Access to areas fishing areas below the site will be enabled across the site rather than through parts of the site as is currently possible to allow. Privacy is not an explicit point of the development but it is alluded to in Annex 2, 3.8 - in the reference to the single access point to the development. Paths may skirt round the development, but access to traditional fishing grounds and any other paths used by the public should be clarified and ensured as a condition of permission.

64. A total of 150 timber framed residential units in 105 acres is low density, and with prices per unit upwards of £650,000 (EIA p. 141) it seeks to attract high net worth visitors (and is open to local buyers). The development's sustainability is dependent on international access of two flights/ week from Europe (EIA p.138) and construction is phased.
65. Access for the disabled is unclear.
66. Other comments:
  - a) Campsite and associated recreational facilities will improve the existing very basic facilities, although there will be Saints who will continue to seek the wildness of camping with little in the way of facilities – probably at Thompson's Wood and Blue Hill.
  - b) Island knock on effects include increased trade for retail (assuming high worth individuals buy local, importing only a minimum) and tourism amenities, especially those charging fees, e.g. water-based activities.
  - c) Skills enhancement and new jobs will be created in construction and in longer term resort management. It is outside the remit of a private planning application to provide information on the number.
  - d) Visually and culturally the timber framed residential units are proposing a change from the traditional building design and will have some impact on the local landscape in the Horse Pasture area. However, the impact can be mitigated through the low density spacing and indigenous vegetation between cabins and with minimum excavation works as proposed.
  - e) The number of cars on the island as a result of the development will increase and this will have an impact on access roads to the development (as focused on in the application) but also for the Half Tree Hollow to Head O Wain turn-off. The Application proposes areas along the access road to the development where improvements will be made.

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### ENVIRONMENTAL IMPACT

67. The development application was supported by an Environmental Impact Assessment (EIA) Report that was reviewed by the Chief Environment Officer (CEO) and other stakeholders. The CEO raised a number of concerns in respect of the EIA Report and these included its content, relevance to St Helena regulations, locally based information, baseline information and the form of assessment. The applicant was advised to review the EIA Report and have regard to the issues raised by the CEO.

68. The Applicant submitted a revised EIA Report which was reviewed by the CEO and a further period of consultation with the stakeholders. The general view of the CEO on the revised EIA report is that some of the issues raised previously have been addressed, however there still remains a number of inadequacies and these have been fully assessed in paragraph 24-28 of this Memorandum. Similarly, in Paragraph 22 concerns raised by the stakeholders on the EIA are also fully assessed.

69. The CEO has concluded that there are a number of inadequacies in the EIA Report and has recommended that these be addressed by way of an Addendum to the EIA report providing information that will address all the issues raised, including those of the stakeholders. The Addendum should include a detailed baseline ecological assessment of the development area which could be phased as the implementation of the development is progressed through the sites. The Environmental Management Plan should be revised accordingly to set out the long-term protection and management of the environment in this area.

### PREVIOUS CONSULTATION/ COMMITTEE INPUT

70. Prior to the submission of the development application, the applicant consulted widely with the community, businesses and stakeholders.

71. The development application was advertised for a period of 28 days on two occasions (the original application and EIA report and then with revised EIA report) to seek comments from the community and stakeholders on the development proposal. During this consultation the Planning Service held two community consultation meetings to explain the proposed development and seek community views. These meetings were not well attended, however the views expressed by the local people are set out in Section 10 of the report.

72. Key Stakeholders have responded and their views have been considered by the LDCA.

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73. There were representations received from St Helena National Trust, Heritage Society and one member of the public to consultation and the issues raised have been assessed and responded to in Section 11 of the report.

74. There has also been a representation received from Enterprise Saint Helena supporting the proposed development.

**PUBLIC REACTION** 75. This will generate both public and media interest during the project. Public reaction is likely to be mixed, some will support the development while others as noted in the Representations received will not be supportive if various issues are not addressed.

**PUBLICITY** 76. ExCo's decision will be mentioned in the ExCo Radio Briefing following the meeting.

**SUPPORT TO STRATEGIC OBJECTIVES** 77. N/A

**LINK TO SUSTAINABLE ECONOMIC DEVELOPMENT PLAN GOALS** 78. The development proposal is intended to address Goal 3 of the SEDP 'Attract Visitors and Increase Tourism.'

**IMPLEMENTATION OF POLICY LEGISLATION** 79. N/A

**OPEN/CLOSED AGENDA ITEM** 80. Recommended for the Open Agenda.

*SO'B*

Central Support Service

1<sup>st</sup> June 2021