

### **DEVELOPMENT APPLICATION 2021/90 – CONSULTATION RESPONSES**

Set out below are the extracts from the consultation responses received from the stakeholder consultation on the proposed development application.

#### Response from Fire & Rescue Service on 21/09/2021

The St Helena Fire & Rescue Service will require the buildings plans for the installation of passive and active firefighting equipment.

#### Response from Police Service – 22<sup>nd</sup> November 2021

The St Helena Fire & Rescue Service will require the buildings plans for the installation of passive and active firefighting equipment.

#### Response from Sure – 5<sup>th</sup> November 2021

This will depend on an appropriate underground route being approved by the relevant authorities to link the Earth Station Facility to the fibre and electrical networks, taking into consideration the sensitive location.

#### Response from Connect St Helena's Energy Section – 3<sup>rd</sup> November 2021

I see no mention of power requirements in the accompanying documentation. Application for electricity is required indicating the maximum power demand for the site to allow Connect to assess whether it can meet the demand.

#### Further response from Connect Energy - 9<sup>th</sup> November 2021

It is noted from the Environment Impact Assessment that the power requirement is 140kW. An application is required for electricity supply.

#### Response from Saint Helena National Trust – 22<sup>nd</sup> November 2021

The Trust's mission is to champion St Helena's heritage through collaboration, engagement, proactive management and partnerships. We see St Helena as unique and incredibly special. We have a legal mandate from the *St Helena National Trust Ordinance 2001* to preserve and protect our natural and cultural heritage and to provide advice to decision makers when our heritage is at stake. We encourage sustainable development and investment as we recognise that St Helena's future depends on economic and social growth. However, we will ensure that change is positive and does not come at the expense of our heritage.

We applaud the St Helena Government for commissioning a full Environmental Impact Assessment for their proposed development at Horse Point. The EIA Report is well-considered in its approach. We

are content that the majority of the risks and impacts have been identified and assessed fairly, and that proposed mitigation and enhancement measures are generally adequate. However, we have six concerns that we wish to raise in relation to the proposed development.

### **1. Invertebrates not fully considered**

Twenty-six endemic invertebrate species, and an additional 33 species that are possibly endemic, were recorded in the proposed development site during the SHNT baseline ecological assessment (Appendix C1). The SHNT invertebrate database has records of 35 endemic species previously linked to the site. Such high levels of endemism mean that Horse Point is a site of global importance for invertebrates. Many of the endemic species are protected by the *Environmental Protection Ordinance 2016*.

The proposed development can cause the extinction of a newly found, undescribed species. A species of fungus weevil was recorded that we suspected is new to science. Under the *Environmental Protection Ordinance 2016* new species are automatically protected. There were limitations in the baseline ecological assessment and we believe it should be broadened. In acknowledgement of the lack of suitable land for the location of the proposed development, we stress the high importance of conducting further research on this fungus weevil through expert identification (description of species) and DNA analysis followed by further surveys to determine distribution and abundance.

The EIA Report recommends mitigations for invertebrates that includes “conducting a search, rescue and translocation operation of endemic invertebrates immediately prior to construction starting”. Such translocations have a poor history of success. Very little is known of the individual ecology of the species concerned, and the description of knowledge of the endemic species is based on assumption. Since it has not been found before on samphire elsewhere is significant – it is a common plant on the island that has been sampled/studied for its invertebrates since the 19<sup>th</sup> century but this fungus weevil not found, which implies that something in its requirements is unusual and not present in other areas of samphire.

### **2. Dryland habitat not fully considered**

The unpromising-looking drylands support a high diversity of endemic invertebrates. Important microhabitats are firm but friable soils and sediments, into which detritivores and predatory species burrow; and embedded rocks under which other species take refuge. Dry leaf litter is also important.

Dryland/desert biodiversity often depend of a ‘crust’ of drought-tolerant organisms: tiny lichens, mosses and various microorganisms, including fungi and algae which stabilise the surface and are probably extremely important to the invertebrates that inhabit desert ecosystems. They are usually only a few millimetres thick at most and are incredibly vulnerable to disturbance. Once broken, they can no longer prevent erosion by wind and can take decades (sometimes quoted as centuries) to re-establish, (though they can sometimes establish more quickly in some circumstances). Dryland/dryland habitats can sometimes be incredibly slow to recover from disturbance, i.e. decades.

Pseudoscorpions as components of the crust fauna – these are a group where there are a number of St Helena dryland endemics, ones which were not included in the ecological survey as there is no really accessible identification material. It is likely that endemic darkling beetles may also be associated with such a crust, and it’s the sort of habitat that would be likely to lead to endemism in the mite and psocid fauna, two other groups in which St Helena has been shown to have a lot of endemics and which also were not included in the EIA.

We hope that the presence of non-native vegetation has not resulted in devaluing the site. What may look barren and boring is actually crucial habitat. Any removal of the invasive vegetation needs to be done sympathetically again to not over-disturb the sediment and also some invasive species are providing important leaf litter for endemics. We recommend there are no go areas and strict rules on how operations and construction is conducted.

### **3. Offsetting significant environmental impacts**

The proposed development will cause significant environmental impact. Horse Point is an important site for wirebirds, invertebrates and dryland habitat. If decision makers are willing to accept the risks and impacts presented in the EIA then we recommend a funding settlement and mitigation restoration for the displacement of wirebirds, invertebrates and dryland habitat. We recommend compensatory works of at least 1.5 times the land take value, using the airport development and its Landscape and Ecological Mitigation Programme as a precedent.

The Trust does not wish to extend the Millennium Forest to Horse Point using tall vegetation (i.e. gumwood, scrubwood, ebony etc.) instead using low growing endemic vegetation (i.e. boneseed, samphire) for invertebrate and wirebird conservation.

### **4. Development inside protected area**

The proposed development is in the Millennium Forest Nature Reserve, which is protected as an ecologically sensitive area. Over the years we are seeing developments 'chip away' at the edges of our protected areas. How much do we value our protected areas? Are we content to continually lose protected areas to developments? At what point does this stop? We encourage greater willingness from SHG to restrict impactful developments in protected areas.

### **5. Lack of clarity on site selection**

There is a lack of clarity in why Horse Point was chosen. The scores against election criteria are not provided within the EIA and there are other alternatives with lesser environmental impacts. The scoring methodology and scores of each alternative are not provided, and decisions are not explained fully. For example, why does a site earmarked for residential development rule it out completely for this project? The requirement for repeating the EIA at an alternative site is not a reason for site selection.

### **6. Lack of consideration for cultural heritage**

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

#### Response from Chief Environmental Officer, Isabel Peters (EMD) – 19<sup>th</sup> November 2021

The proposed development is to be sited within the Millennium Forest Nature Reserve (MFNR), a National Conservation Area (NCA). The boundary of the MFNR as defined in the Land Planning and Development Control Plan (LDCP) 2012-2022 represents the total area that would eventually be replanted to recreate the Great Wood. The site in question is currently not planted and is not within the recognised boundary of the Millennium Forest. Nonetheless it has been established that the area is ecologically important supporting at least 3 wirebird territories and hosting a number of

invertebrate species known to be endemic, a further number of invertebrate species thought to be endemic and a species of weevil thought to be new to science. The area is also used by walkers and tour groups to appreciate the natural environment and to access a viewing area looking onto the airport.

The LDCP policy NH.2 states that there will be a presumption against development in NCAs unless such development will assist in the conservation and appreciation of the natural environment. A satellite earth station space park would therefore not be considered appropriate development to meet these objectives.

The development application is accompanied by an Environmental Impact Assessment Report (EIAR). The EIAR is comprehensive and clearly follows the 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.

The EIAR identifies a number of environmental issues. The key adverse impacts being those relating to the ecology of the area, primarily wirebirds and invertebrates and the visual impacts of the development. Socio-economic issues are also identified as having potential benefits for St Helena. The EIAR also includes a sound justification as to why Horse Point has been selected as the preferred site for siting a Satellite Park.

The EIAR proposes a number of mitigation measures which are considered to be appropriate and achievable including recommendations to re-position the satellites to avoid the sensitive areas. It is not clear if this has been done and is reflected in the layout in the submitted site plan. It would have been helpful in this respect to include an overlay of the sensitive areas as shown on Figure 5.11, pg 49 in the EIAR onto the submitted site plan.

The EIAR concludes that due to the “significant adverse effects of developing the proposed site on wirebirds and endemic invertebrates but bearing in mind the significant socio-economic benefits” of the development, 5 options should be considered during decision making (see pg 109 in the EIAR). It is recognised that option 1 (no-go) is unlikely to be supported due to the significant socio-economic benefits of allowing the development, therefore a combination of options 3 (avoid sensitive areas), 4 (minimise impacts) and 5 (offset to provide additional conservation benefits) is recommended. And to ensure the best possible outcome it is also recommended that if this development application is approved a formal dialogue with local environmental specialists and interest groups is established.

### **Review of the Environmental Impact Assessment Report**

**Reviewed by:** Chief Environmental Officer, Isabel Peters

**Review Completed:** 19<sup>th</sup> November 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 (1) of the *Land Planning and Development Control (Environmental Impact Assessment) Regulations, 2013* which states what should be included in an EIAR.

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

## **General Observations**

The site for the proposed development is within a National Conservation Area (NCA), the Millennium Forest Nature Reserve as defined by the boundary included within the Land Development Control Plan (LDCP) 2012-2022. The area is however as referenced within the EIAR not currently within the planted area of the Millennium Forest.

The LDCP policy N.H.2 states that there is a presumption against development in NCAs except for development that will assist in the conservation and appreciation of the natural environment. Reference to this policy is not included in the EIAR.

The EIAR does include a sound justification for why the development is needed and the benefits it will bring to St Helena, the South Atlantic region and for satellite telemetry generally. There is also a clear justification as to why Horse Point has been selected as the preferred site.

The area required for the Space Park is 11.2ha but the actual area of disturbance will only be 2% of this. The footprint on the ground is therefore fairly small.

The key environmental issues relate to the designation of the site as an NCA, the impact on the sensitive ecology and the visual impact.

The EIAR is comprehensive and clearly follows the process of identification of impacts, establishment of baseline, assessment of impacts, identification of mitigation measures, assessment of impacts after proposed mitigation and monitoring and reporting.

The EIAR was also informed by a Scoping Opinion which can be used to set out what should be included in an EIAR. The Scoping Opinion produced by the Chief Planning Officer (CPO) is included in the EIAR as Appendix A2. The EIAR largely addresses the issues raised in the Scoping Opinion

## **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. The EIAR correctly references the governing legislation and has been done in accordance with the requirements for what an EIAR should include as stated in Regulation 2 (1) of the *Land Planning and Development Control (Environmental Impact Assessment) Regulations, 2013*. Only the schematic presentation [pg 3-4, Fig 2.1] incorrectly references the Type A and Type B developments which relate to previous legislation no longer in force.

## **Review**

In accordance with Regulation 2 (1), *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*

Chapter 4 in the EIAR gives a description of the proposed development including a description of the physical characteristics and the associated land use requirements. It is noted however that this is based on conceptual designs as final designs were not available.

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

Section 4.4 in the EIAR details the construction processes and types and quantities of materials based on the concept designs. The requirements for utilities (water, power and access) is also given [pg 29-32].

*(c) Identification of environmental issues*

The EIAR identifies the environmental issues apparent with the key environmental issues identified as relating to the ecology of the area, primarily wirebirds and invertebrates and the visual impacts of the development. Socio-economic issues are also identified as having potential benefits for St Helena.

Environmental issues that were considered but were excluded from the assessment for the reasons stated [pg 35, Table 5.1] is also included.

*(c)(i) Quantified assessment of impacts*

The impact assessment criteria is clearly defined.

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

Chapter 5 in the EIAR describes the baseline environment for all of the relevant environmental conditions of the project site. An ecological baseline was established and included wirebirds, vegetation and invertebrates. Surveys were done in October 2020 and January 2021 with a further verification survey done in May 2021. The studies concluded that the site was an important one for wirebirds although the annual wirebird census showed large fluctuations. The invertebrate surveys confirmed the presence of a number of endemic species, with a further number thought to be endemic including a species of weevil thought to be new to science.

*(c)(iii) Mitigation Measures*

*(c)(v) Monitoring and Reporting Procedures*

*(d) Outline of Alternatives*

*(e) Non-Technical Summary*

*(f) Indication of Assumptions made and Constraints*

It is stated that the EIAR was based on the information available

**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.

The EIAR is considered to be of a high quality and is sufficiently detailed to enable the environmental impacts (both positive and negative) to be clearly understood.

Response from Sustainable Development Division within the T&SD Portfolio – 17<sup>th</sup> November 2021

St Helena has some of the slowest and most expensive broadband in the world. This has a significant negative impact on all aspects of social and economic development on-Island. Improving connectivity is a key strategic objective for St Helena as highlighted in the 10-Year Plan and the Island's Digital Strategy.

The 11<sup>th</sup> allocation of the European Development Funding (EDF 11) has been agreed by the European Commission to provide budget support to St Helena to specifically deliver on the objectives of the Digital Strategy under the focal sector of 'Improved Connectivity and Accessibility'. A total of €21.5 million is available to the territory (ie St Helena, Ascension and Tristan da Cunha) of which St Helena will receive €17.2 million (equivalent to £14.7m) for the delivery of improved connectivity through a fibre optic sub sea cable.

A 2017 report by consultants *Evidence on Demand* states that a long term objective of the Fibre Optic Cable Project is to ‘provide an opportunity for potentially revenue generating or revenue-earning projects in the future. The foremost of these is one or more satellite ground stations to be built, located on St Helena, so that revenues from these can potentially contribute to the cost of broadband delivery and subsea cable link operation and maintenance in-life charges (if this outline is economically feasible). The ground stations need to connect to a subsea cable to provide high-speed, high capacity backhaul links. The objective from doing this part of the activity, is to reduce the cable operating cost to St Helena over cable life, and to top-up/replace any initial funding subsidies with cost-recovery opportunities.’

Since 2017, SHG has therefore been liaising with OneWeb. OneWeb uses satellite systems to provide connectivity to some of the most remote parts of the world. They say that ‘by end of 2021, OneWeb will have the capability to provide high-speed coverage everywhere above 50 Degrees North, including the United Kingdom, Alaska, Canada, Northern Europe, Greenland, Iceland, and the Arctic Seas. Full global coverage is expected in 2022’. A Ground Station on St Helena helps to provide coverage in the Southern Atlantic Seas, where their other Ground Stations cannot reach. This will enable provision of a service available to Tristan Da Cunha to access internet speeds of around 10MBps, for example.

1. The benefits of the project includes the following:
  - a. **Economies of Scale.** The Ground Stations will require electricity services and internet connectivity. This will provide revenue to the service providers. With this additional revenue, it makes the unit costs lower (because fixed costs are shared more widely), which can lead to a positive effect on tariff prices for other users, and/or help the telecommunications provider to pay costs related to the cable maintenance for example.
  - b. **Employment.** The Ground Stations are mounted on small plinths around 1.5m by 1.5m. There will also need to be fencing, and possible construction of a small building holding data and power. Local construction companies will be utilised for the development. There is also the potential to employ a security team.
  - c. **Potential for Corporate Social Responsibility opportunities (CSR).** OneWeb has strong CSR principles and promote their ‘Responsible Space’ and ‘One Earth’ programmes. They have offered to support students interested in doing placements with them. They also offered to provide funding to the National Trust to help them expand or manage some of the Millenium Forest which neighbours the site. These things could be further discussed after planning permission has been granted.
  - d. **Image.** St Helena will be marketing itself as a digital destination in preparation for the Fibre Optic Cable going live. This project will be the first digital related company St Helena will have succeeded to attract to the Island. This helps to demonstrate to the world that St Helena is keen to work with digital businesses. This could open the way for hosting other Ground Stations or other digital business in the future, where feasible.
  - e. **Contribution to EDF’11 evaluation.** The EDF’11 funding is contingent on SHG meeting milestones as agreed with the EU. These include a milestone relating to ‘Improved business climate, economic growth and job creation through improved connectivity’

It is estimated that OneWeb will invest up to £100,000 per annum. This will be split into licence fees, land costs, electricity costs and telecommunication costs. It is not known how much of the amount will be split into the different areas, since the telecommunication costs have not yet been publicised and there would be a period of negotiation on rents. OneWeb already commit £17,000 per annum to use the frequencies they require for their Ground Stations.

Executive Council endorsed the Digital Strategy in 2016.

Executive council gave this project its backing in July 2021.

The project supports the following National Goals and Strategic Objectives:

*Altogether Wealthier - 3.3 Ensure Digital Strategy and Fibre Optic Cable delivers intended benefits to the whole community*

*Altogether Better for Children and Young People – Ensure effective investment in human capital through work force development and improved education and training*

The Project supports the majority of the SEDP Goals as follows:

1. Increase Exports
3. Attract Visitors and Increase Tourism
7. Improve Infrastructure
9. Develop the Digital Economy

Representation from Mr A Pearce

1. General

Satellite earth stations have enormous potential for St Helena and the EIA lists several viable sites. However it appears that the most difficult site in terms of environmental sensitivity and planning policy has been pursued in this application. It is an inexplicable decision which could jeopardise the future economic potential of satellite earth stations in St Helena.

2. LDCP Policies

The Scoping Opinion sent by the CPO to the applicant (dated 30 March 2020) states the EIA should assess the site in terms of specific LDCP policies, as shown below.

**Table 2: Topic Areas for Assessment**

<b>Additional Areas of Assessment: Development Plan Policies, Plans and Strategies, Direction and Guidance for Environmental Assessment</b>	
<b>Saint Helena Land Development Control Plan 2012</b>	
<b>Coastal Zone Policies:</b> <ul style="list-style-type: none"> <li>• CZ1 (Primary Policy)</li> <li>• CZ2</li> <li>• CZ3</li> <li>• CZ4 (c, d)</li> <li>• CZ5 (Essential Infrastructure)</li> </ul>	The EIA needs to assess the impact of the proposed development on these policies and how the proposed development delivers on these policies. The assessment need show whether the impact is direct or indirect and if there is an impact, is it positive or negative and what is the likelihood and its severity of this impact on the policy as a whole or on the sub-sections of the policy.
<b>Airport Policies:</b> <ul style="list-style-type: none"> <li>• AP1 – Part 2</li> </ul>	---- ditto ----
<b>Telecommunication Polices:</b> <ul style="list-style-type: none"> <li>• TX1 (a, b, c, d)</li> <li>• TX2</li> <li>• TX3 – not materially damage NCA</li> </ul>	---- ditto ----
<b>Natural Heritage Policies:</b> <ul style="list-style-type: none"> <li>• NH1</li> <li>• NH4</li> </ul>	---- ditto ----



No assessment of those policies is included in the EIA. Therefore the EIA has not provided the environmental impact assessment required in the CPO's Scoping Opinion. Also no consistent assessment of alternative sites have been made against LDCP policies.

Several of those policies indicate the application should not be permitted. See below: Coastal Zone policies

CZ.1 says 'There will be a presumption in favour of retaining the natural appearance and ecology of the Coastal Zone and the grant of development permission will therefore be regulated by the following implementation policies...'

CZ.5 is one of the Implementation Policies. It says, 'Permission in the Coastal Zone will not be granted for commercial development which is not tourism related or is not for commercial agriculture or forestry or essential infrastructure.'

The application is for the commercial exploitation of the Google cable by a commercial company. Commercial development is not permitted under CZ.5.

Is the application for 'essential infrastructure'? The earth station could be described as infrastructure but is it essential? Can the island survive without it? The EIA repeats that the earth station will be of considerable benefit to the island but not that it is essential. The application is not for 'essential infrastructure' therefore it is not permitted under CZ.5.

#### Telecommunications policies

TX.3 says that telecommunications equipment and structures should not be materially damaging the character of the National Conservation Area.

TX.1 (b) says that while antennae will be permitted, in National Conservation Areas, protection of the landscape, ecology shall take precedence. The proposed telecommunications equipment will completely change the character of this National Conservation Area and therefore the application should not be permitted under TX.3 and TX.1 (b).

#### Natural Heritage policies

NH.2 says 'In the National Conservation Areas there will be a presumption against development except development that will assist in the conservation and appreciation of the natural assets and ecosystems that they harbour...'

The purpose of the earth station is telecommunications. Only in very spurious terms can it be described as assisting in the conservation and appreciation of the natural assets and ecosystems. The application does not so 'assist' and therefore it should not be permitted under NH.2.

#### Departure from the Plan

It is difficult to understand why the application on this site has been pursued. There is no explanation in the application or EIA as to why it should be treated as an exception. Neither is anything provided to 'justify a departure from the Plan' in accordance with Section 15 of the Land Planning & Development Control Ordinance 2013.

### 3. Economic issues

In determining the application, material planning considerations include environmental, social and economic considerations. Some form of argument for economic benefit can be made for all development applications. In this case the economic arguments appear to loom large for example in relation to reducing internet costs. However the hindering of economic development should also be

considered. Horse Point is a beauty spot and established tour destination. Its approach, ambience and amenity will be severely detrimentally impacted upon by the proposed development, affecting the whole Island tourism product. This is also a social consideration.

The application contains no specific data that demonstrates there will be economic benefit to the island over and above any of the other alternative sites. If economic development is to override LDCP policies then there is no factual case for economic benefit submitted in this application.

#### 4. The 10-Year Plan

The application and EIA refer to the National Goal, Altogether Wealthier. Omitted is in any reference to Altogether Greener. It says, 'the preservation of our land, wildlife, marine and built heritage, but also how we can advance in terms of renewable power and utilising technology to deliver improved green social economic outcomes.'

Altogether Greener implies the technological developments such as the earth station needs to be designed to work within the framework of the Island's natural heritage. Such goals are spelt out as the purpose of the LDCP (page 4) as, "the Plan's declared vision for St Helena of: 'sustainable growth in its economy; improved social, living and cultural facilities; and steadfast protection of its environment'."

Working coordination between the applicant and the planning system appears not to have occurred for the benefit of the island which therefore is also against the National Goal of Altogether Greener. Therefore the application does not fulfil the goals of the 10-Year Plan.

#### 5. Alternative Sites

The EIA lists the main alternative sites as White Hill at Levelwood, Pipe Ridge and Bradley's Camp. At White Hill and Pipe Ridge access to fibre and electricity is listed a key disadvantages. No explanation is given as to the problem. Is it physically impossible or too expensive? The British Government has just invested £500 million into OneWeb. Thousands of miles of undersea cable has just been laid. Is there no money for a few hundred yards of extra cable? This is a reason given to not use those two sites and to build a National Conservation Area instead. The EIA and rationale fails to be convincing.

The EIA does not point out that White Hill, Donkey Plain and Pouncey's are in the Intermediate Zone, neither are they in National Conservation Areas. Pursuing these sites would not entail such environmental constraints as at Horse Point.

Bradley's Camp is also considered a key site. However the EIA says it is not useable because it is a temporary quarantine station. Although located in the Coastal Zone it is likewise not a National Conservation Area.

The EIA does not explain that the site was converted into a quarantine station at about the same time potential satellite station sites were being explored. It was converted without development permission.

The development would appear to have contravened LDCP policy TX.1 (c) that, 'Development permission will not be granted for development which would preclude or prejudice the installation and operation of such equipment on optimum sites.'

There would seem to have been some home goals in the process to achieve a satellite station. Horse Point and the pleasure it gives to islanders and visitors alike should not be sacrificed for others' mistakes.

During this public consultation period the Planning Officer said he expects that if this site is given the go-ahead he expects several of the other sites will be used as well. If that is the case then there is nothing wrong with the other sites. Why is the most environmentally sensitive site being pushed to the fore?

#### 6. The site itself

The information provided by the applicant is basic and insufficient to properly assess the physical and visual effects on the site and its surrounding.

Three of the 22 domes will be fifty feet in diameter, as high as the main tower on St James Church. This is not clear from the application drawings. The three domes in themselves will have a greater impact on the landscape than the others put together. They will sit up high upon the saddle which is the site. Why has the applicant not produced basic sectional drawings, elevations or 3D graphics to proudly show how their project will affect this beauty spot?

#### 7. To summarise

OneWeb claims to be an environmentally friendly company in space. Does this British Government funded company realise that through this application it is appearing to be environmentally destructive on Earth?

The many opportunities for satellite earth stations in St Helena are tremendous and they need to be pursued but not on this site.

## **Public consultation meetings for the Proposed Earth Satellite Station**

### **Public's concerns and questions:**

#### Harford Community Centre - 4<sup>th</sup> November 2021

1. As part of the proposal, can the developer be required to create an improved access road around the site for the public's use?
2. Is the developer buying power from Connect St Helena or do they intend to apply for planning permission for solar power? (Connects representative "KP" joined in with the public to say that Connect is not aware of any proposal for electrical supply and that Connect doesn't know if they have the capacity to serve the proposed development.
3. Will security lights be on all night? If no, how sensitive will the security lights be? Will animal/rodent movements trigger the lights?
4. Is the proposal in line with the Nature Reserve Management Plan?
5. What is the duration of the construction part of the proposal? (CPO: 9 months)
6. What is the life expectancy of the equipment? (CPO: 10 years) What will happen after the 10 years, will equipment be left scattered out at horse point dumping site

or will it be taken of island? (Connects representative “KP” joined in with the public to say that the developer should be made to take any abandoned equipment of the island.)

7. Public felt that details of the surrounding fence should be submitted with the initial planning application.
8. Why was that particular site chosen? Gerry Roberts agreed to request a report of “ONEWEB” regarding site choice.

#### Jamestown Community Centre – 9<sup>th</sup> November 2021

1. William Clingham (owner of the quarry in the area) asked if the development will have any impact on the current quarry site, and will the quarry blasting operations affect the earth station once its completed?
2. If no toilets are proposed, what will staff use during the periods of monthly maintenance on the station?
3. Mike Olson commented that without the earth station development the new fibre optic cable would be a waste, plus he said development will be of benefit to the island and therefore should be supported.
4. Gilbert Legg said that Decision Making Bodies should not allow non-compliance to policies i.e. “the development being visible from different vantage points” to hinder the approval of this development.