

Planning Officer's Report - LDCA 21 AUGUST 2025

APPLICATION 2025/53 -	Construction of a New Prison at Bottom Woods with ancillary Dojo, Service buildings, access road, parking area and sewerage treatment plant
PERMISSION SOUGHT	Full Permission
REGISTERED	1 July 2025
APPLICANT	Safety, Security & Home Affairs Portfolio, SHG (Agent: Programme Management Office, SHG)
PARCEL	LWNO446
LOCALITY	Bottom Woods, Longwood North
ZONE	Coastal Zone/NCA
CONSERVATION AREA	Important Wirebird Area
CURRENT USE	Grazing, although initial works started after 2020 approval (DA Ref.s 2018_77 and 2019_114)
PUBLICITY	The application was advertised as follows: <ul style="list-style-type: none">▪ Sentinel Newspaper on 3 July 2025▪ A Site Notice
EXPIRY	31 July 2025
REPRESENTATIONS	Four representations were received.
DECISION ROUTE	Delegated / LDCA / EXCO

A. CONSULTATION FEEDBACK

a)	Sewerage & Water Division	No Objection
b)	Energy Division	No Objection
c)	St Helena Fire & Rescue	No Objection - comments
d)	St Helena Roads Section	No Objection
e)	Heritage	No Objection - comments
f)	Environmental Management	No Response
g)	Public Health	No Response

Report Author: P. M. Coyle (CPO)

Report Date: 21 August 2025

Application: 2025/53

h) A&NR	No Objection - comments
i) Property Division (Crown Est)	No Objection
j) St Helena Police Services	No Response
k) Aerodrome Safe Guarding	No Objection - comments
l) Economic Development	No Objection
m) National Trust (NT)	No Response
n) SURE SA Ltd	No Objection
o) Maritime	No Objection

B. BACKGROUND

This application is submitted as the Chief Planning Officer did not consider the proposed numerous amendments to the previously approved scheme (development Approval 2019/114) to fall with the Land Planning and Development Control Ordinance's Section 29 which allows for Minor Variations to an approved scheme.

While the Prison has relevant planning history (see below), including that it was approved in principle (the outline proposal 2018/77 considered the current location to be acceptable for a new prison), the applicant has advised that the full proposal (detailed submission 2019/114) approved in 2020 cannot be constructed as it is not a fully designed version.

This current application will therefore be considered as a full application on its own planning merits.

For the purposes of this current application consideration it should be noted that the proposed excavation indicated on the submitted plans to provide a level platform for the prison building is not (at the time of drafting this report) been agreed but is being considered separately under Condition 8 of the Development Consent 2019/114. This is because the previous scheme has technically been started on site and Condition 8 allows for deviation to the approved excavation(s). This will enable works to continue on the application site while this current application is being considered and any planning conditions are discharged in advance of implementation, should permission be forthcoming. However, it does not preclude consideration of the excavation/excavation extent included in the current submission or the attachment of relevant conditions, in particular, any land not included in the excavation details which remains at existing ground levels shall be included in the details for the landscaping plans.

C. PLANNING OFFICER'S APPRAISAL

LOCALITY & ZONING

The application site is located in Bottom Woods where the area is mainly agricultural and designated within the Coastal Zone and in a National Conservation Area – Important Wirebird Area (IWA). The former Goat Pen has recently been removed.

PLANNING HISTORY

At Application Site:

DA Ref	Date submitted	Approval Type	Development Description	Outcome	Type	Notes
2018/77	07.08.18	Outline	HM Prison and Custody Building (New)	DN Issued 8.10.19	Approved With Conditions (AWC)	Given 2 years to submit full application i.e., until 7.10.21
2019/114	18.12.19	Full	HM Prison and Custody Building (New)	DN Issued 12.3.2020	AWC	17 Conditions
2019/114/DoC5	08.05.24	Condition Discharge	Detailed design and construction of the access road	Decision not issued	Not pre-commencement condition	Further details to be provided for discharge of the condition (to be prior to works commencing on access road)
2019/114/DoC1	16.12.24	Start on Site (Condition 1)	Demolition of goat pen and clearing of land for access road	Informal agreement (email) 16.6.24	No specific details needed for discharge, however, photos indicate start made	-
2019/114/DoC6	-	-	Details of the landscaping scheme	-	Not pre-commencement condition	Details not yet submitted for discharge (needs to be prior to landscaping works commencing)
2019/114/DoC8	16.06.25	Condition details amended	Excavation amendment - deviation			Proposed 15m cut indicated as not acceptable on 4.7.25. Awaiting revised submission (due 30/31.7.25)

Report Author: P. M. Coyle (CPO)

Report Date: 21 August 2025

Application: 2025/53

At Coleman House, Jamestown:

DA Ref	Date submitted	Approval Type	Development Description	Outcome	Type	Notes
2019/115	19.12.19	Full	Proposed Custody Suite	DN Issued 12.03.2020	AWC	Completed/in use

PROPOSED DEVELOPMENT

The application is for the construction of a New Prison at Bottom Woods with ancillary Dojo, Service buildings, access road, parking area and sewerage treatment plant on a site of approximately 10.85 acres and forms part of a larger greenfield site that is approximately 94.0 acres, situated in a predominantly agricultural area. The actual enclosed area of the development, considered to be the “built development” is approximately 5.20 acres forming 5.5% of the total greenfield site.

The proposed site is situated on a small portion of the Wirebird National Conservation Area known as an Important Wirebird Area (IWA) in Bottom Woods, locally known as the Goat Pen. It is also close to the Meteorological Office and proposed Sports field and associated infrastructure. There is a residential area to the north to be developed as a housing led CDA with associated commercial development and supporting infrastructure.

The site forms the apex of a hill and land falls away mainly to the North and South. The site is on the Southern slope grassland but for the aforementioned car parks.

The area to the north, east and south-eastern side of Haul Road is rugged terrain beyond which are the civic amenity site and the Millennium Forest. The area directly south of Haul Road in line with development site is mix of open space, grassland, agricultural and residential and area to the west is mainly agricultural. The open space to the west of the existing residential area is the Bottoms Wood CDA being developed for around 50 residential units, retail use and community facilities. This development was granted hybrid development permission by the Governor-in-Council in December 2019. The residential properties are considerable distance from the proposed development site to have any significant impact on the amenities of the residential properties and other uses.

The site is located within the boundary of the Bottom Woods Important Wirebird conservation area and therefore, concerns are that the proposed prison development will significantly impact on the Wirebird habitat within a protected area.

Report Author: P. M. Coyle (CPO)

Report Date: 21 August 2025

Application: 2025/53

Diagram 1: Site Location (including access road) (purple coloured area)



An Environmental Impact Assessment Report (following a previous EIA screening opinion adoption) has been submitted with the Prison application. It is the same report dated 2019 that was submitted for the previous outline/detailed approval in 2018/2019. This has been supplemented with up-to-date details of Wirebird nesting/foraging information.

The development site is roughly square and lies approximately 280m north of the Haul Road that provided a link between the Airport and Rupert's Wharf during construction and is retained as part of the Primary Road network on this route.

The main building will sit on a build platform (strip and pad footings) at +440 AD (ground level) formed though excavating the existing sloping land. The entire build including the section of access road to the North West of the prison building and the sewage plant sits between the 450 and 440 contour, thus requiring excavations into the sloping land.

Diagram 2: Proposed Site Boundary/layout Plan



The building will itself be single-storey in a cruciform shape of a generally traditional St. Helena style with concrete to the floors and ceilings, stone exterior walls and an IBR gable-ended roof form. The building would at a maximum extent be approximately 70m deep and 76m wide. The building would have an apex roof coloured green at 4.7m (approximately) above ground level to the eaves and 7.7m to the roof apex; there would be a 1m overhang. The lantern section will have a pyramid-shaped roof at a maximum height of 10.7m above ground level. The Administration/Welcome block will be just under 35m wide with each Prison “Wing” being approximately 14m wide.

The prison would be for upto 60-people and the prison will provide 28 standard cells, 2 care and separation units (CaSu) and 3 enlarged cells for prisoners with mobility or other disabilities. This is together with associated rooms/ancillary buildings to provide

for education, rehabilitation, training, medical room, sports, healthcare, worship, kitchen, recycling, storage, visiting, administration centre, horticulture and security.

Diagram 3: Proposed General Floor Plan

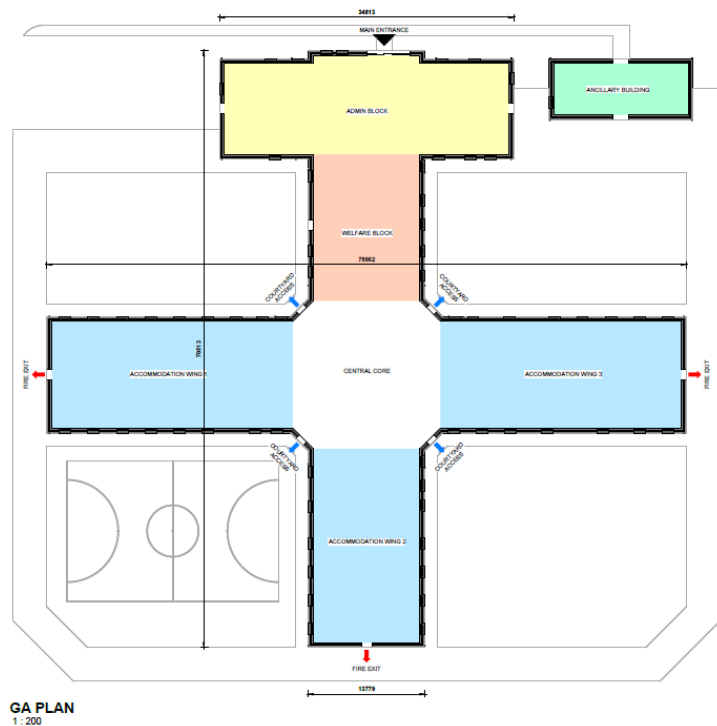


Diagram 4: Proposed Roof Plan

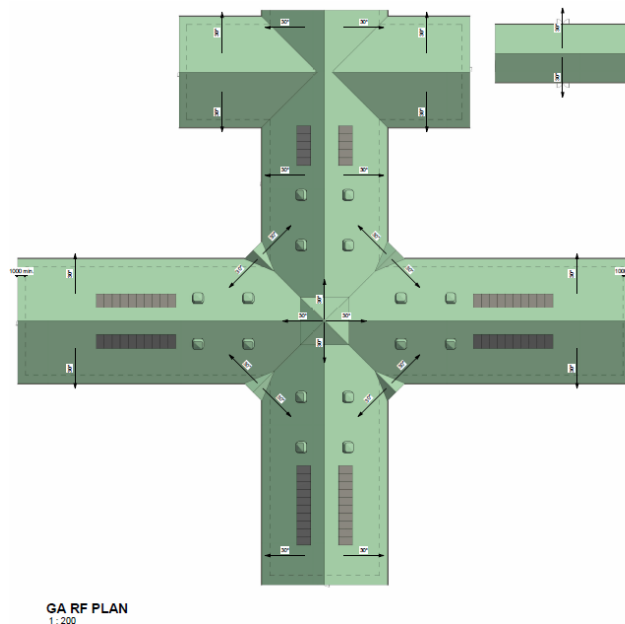
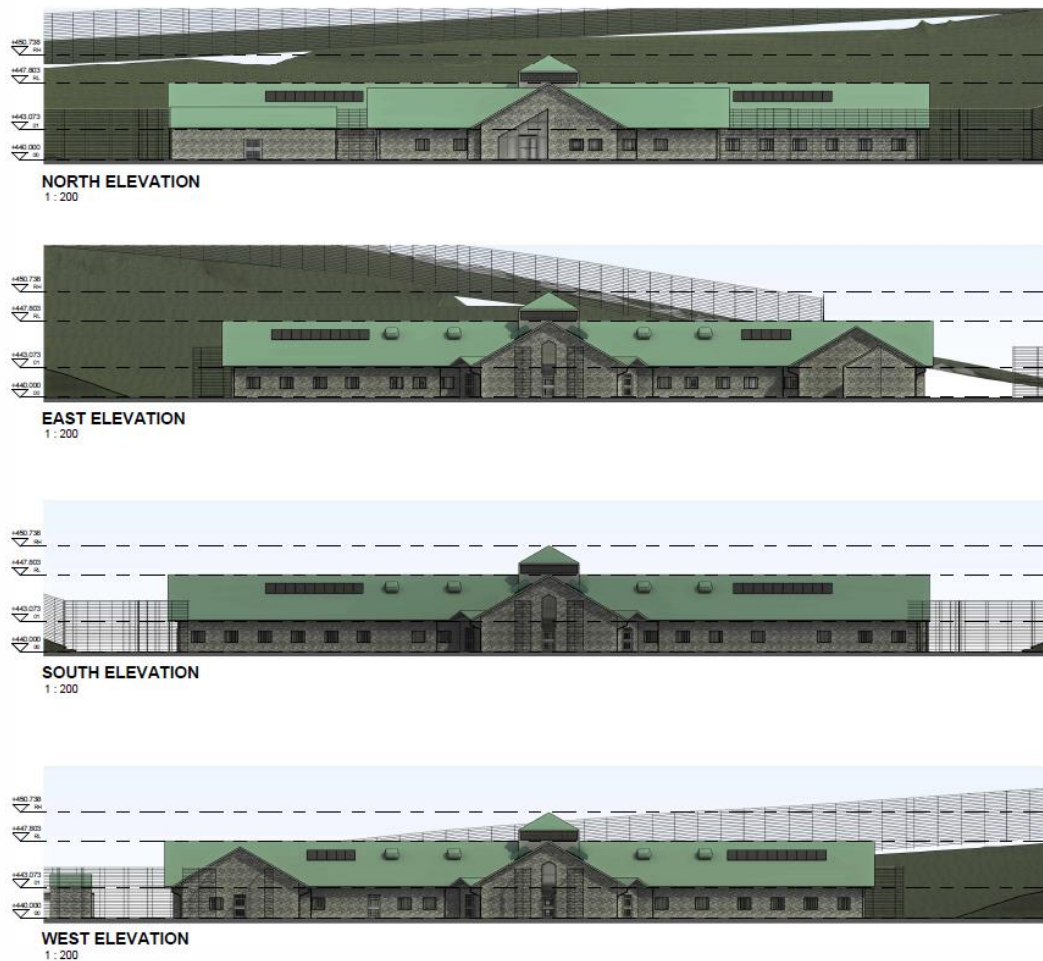


Diagram 5: Proposed Elevations



To each corner of the square enclosure within the inner fence would be exercise yards for the prisoners' use plus a garden/allotment area. Adjacent to the main structure will be the fenced female and male with juvenile exercise yards, including a marked out "football" pitch area and a fenced garden area.

A "Dojo" building will be located to the east of the main entrance point to the prison building. The Dojo will be small compared to the main building and will not extend beyond its maximum extent. It would have a green-coloured apex roof which will be 4.7m to the eaves. It is indicated that the proposed Dojo would be for prisoner use but could also be used for staff training sessions. Outdoor space is also proposed including a Football Pitch marked in one Yard area and a planting area/allotment in another. There would be access to all of the Yard areas from the central hub although it is intended that access would be restricted to certain groups.

A Sewerage Treatment Area (STA) will be provided to the east of the application site together with other ancillary buildings in a fenced, secure enclosed area. The STA will

provide a plant for both the prison and adjacent urban areas of Bottom Woods and Longwood. A dedicated utility area including transformers, HV gear and plan will be provided in an enclosure with the STA.

The entire site will be surrounded in specific prison-grade double fence to comply with appropriate UK Ministry of Justice (MoJ) Prison Standards with the outer fencing being located at the top edge of the excavated area and extending to the flat area proposed to the front of the prison.

Diagram 4: Proposed Site Section Detail



The proposed prison build includes excavation, currently shown on submitted plans as being approximately 15m depth (maximum) and extending to the west, south and east of the proposed prison building (albeit that this may be effected under the previous approval, prior to this application being implemented, should a deviation be approved under Condition 8 of the 2019/114 approval). The plans show that barm/bunds would be located at existing ground level outside the excavated area/outer security fencing.

The prison site will utilize green renewable technologies such as Photovoltaic panels, Sunlight lighting columns, solar water heating, rainwater harvesting and a dedicated sewage treatment solution.

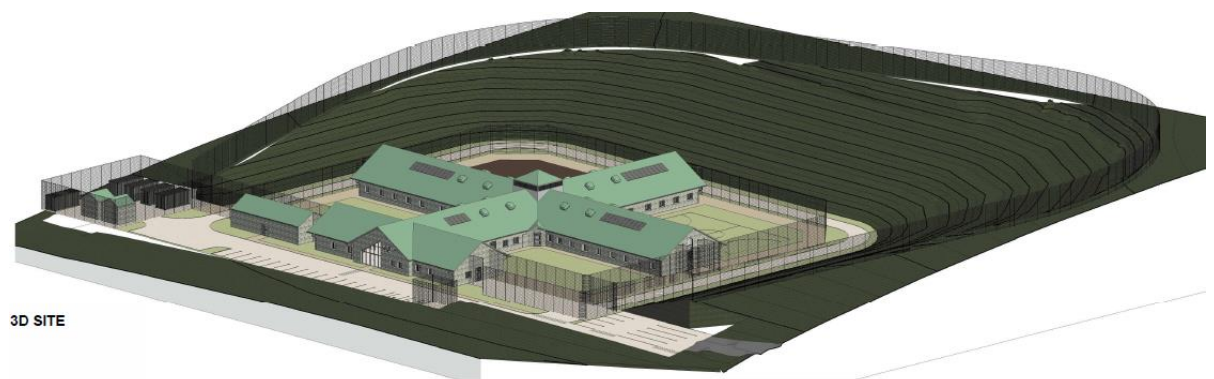
Surface/storm water management and foul drainage will be provided, designed as an extensive network of underground chambers and pipes with outflow to a local gut or watercourse. Other service installations including electricity, water, communications, together with CCTV, street and security lighting, which will require security will be provided.

Proposed earth berms will be shaped, formed and well compacted and planted over with local grass or shrubbery in order to maintain their integrity and avoid erosion of same during high rainfall and surface water flow.

Size and shape of berms will vary depending on slopes and heights of contours over which surface water is to be managed but on average will be approximately 1000mm

in width and 300mm in height. Height should not be of such that during high rainfall surface water is prevented from flowing over the top of the berm. Rock swaling can also be installed behind the berm, within in catchment / flow area to assist with subsoil drainage.

Diagram 6: Proposed 3D Building/"15m cut" Excavations

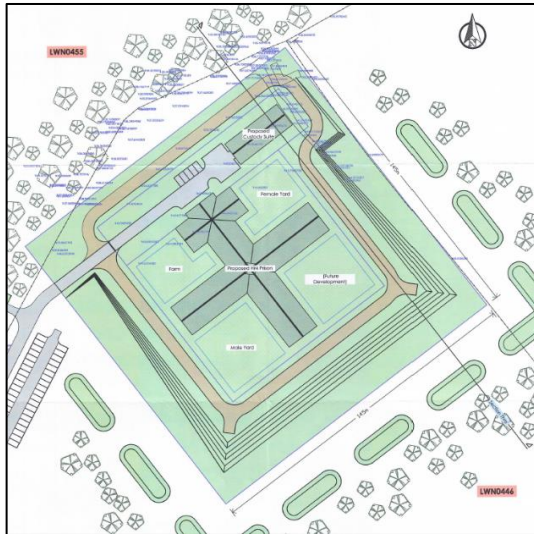


The access road is proposed to lead directly off the Haul Road/Flagstaff View Road via a bell-mouth junction and run inside/along the edge of the cliff on the North West boundary to the prison site. It would be approximately 400m long. While the road would be designed to accommodate emergency and delivery vehicles, the carriageway would be reduced to 4.5m in width along straighter sections (with possible gabions) due to expected low traffic volumes. To provide for the road, some excavation on one side and build up on the other would be required.

Two areas of car parking will be provided: 20 spaces in a single line to the front of the prison for visitors and 20 parking spaces to the north-west of the main building for staff parking; totaling 40 parking spaces. This would include 6 accessible bays. The applicant indicates that this would meet the parking requirement of the prison and visitors. These parking spaces will be located next to the access road but outside of the perimeter fencing.

Relationship with previous approval:

Diagram A: 2019/114 Approved Layout showing site excavation



This current proposal would provide a prison on a similar footprint as previously. However the current proposal has been submitted as much of the originally approved scheme could not be implemented as per the approved, more conceptualised, plans. Also, the applicants have taken the opportunity to reassess the details for the new prison and custody suite and the proposed works needed to provide it. This proposal is therefore solely for a new prison which is an amendment to the previous approval for a prison and custody suite.

Diagram B: 3D Concept Details for approval 2019/114



While included in the 2018 and 2019 applications as part of the development description a custody suite has since been erected at Coleman House (Development

Report Author: P. M. Coyle (CPO)

Report Date: 21 August 2025

Application: 2025/53

Approval 2019/115) and is not required as part of this current application; the proposal was previously for 26 single cells but the current application is indicated to be for a 60-person facility. Some cells will be added/allocated for example to include juvenile prisoners, some “time out” cells and cells for prisoners with disabilities although some may be on an “either/or” basis. A “dojo” is proposed which was not included in the previous consent (albeit on a similar footprint to the originally approved custody suite). Changes have been made to relocate the sewerage plant to the lowest point on the application site, add some service buildings/bin storage and rearrange numbers and car parking spaces; a turning area for delivery vehicles is added and the loop road has been partly removed, the admin/welcome centre has been increased in scale and the external materials are changed to full stone elevations (from mainly render) with a roof colour change and a 1m wide overhang introduced as a security feature; various other more minor changes have been made. The previously signalled junction with “Haul Road” is to be changed to a bellmouth junction. The original cross-shape of building is otherwise largely unchanged although several additions have been made including extra accesses to the outdoor areas direct from the centrally located staff observation station with dormer roofs and the large central roof feature has been changed, with solar tubes and PV panels added.

As previously indicated, the proposed excavations will be undertaken (if there is an agreed deviation under Condition 8 of approval 2019/114 approved) before any proposal agreed under this application is started. Therefore, for clarity, excavation works indicated on the plans submitted under this application number are not specifically for consideration as part of this application.

As previously, and for safety/security reasons, full details of the layout internally are not provided for consultation purposes.

STAKEHOLDER FEEDBACK & REPRESENTATION

There were representations received (see below) although none from members of the public. Although no objections were raised, comments were made as follows:

Chief Environmental Officer/Environment and Natural Resources:

The development application for the new prison was originally submitted in 2018 as an outline development application (2018/77). An Environmental Impact Assessment (EIA) was submitted for this application dated July 2019. This new application (2025/53) shows some variation to the layout of ancillary buildings and features but the overall development remains the same and the impact on the environment from the development is considered to be the same. Whilst the site plans show significant changes to the excavation it is understood that this is not part of the development

application and is being dealt with separately as a variation under the previous planning permission and is therefore not considered in the response to this consultation.

Since the EIA was done in July 2019 there have been few if any changes to the site and the environmental baseline. However there is 6 years of additional wirebird census data and additional data on wirebird territories and wirebird nesting locations within the Bottom Woods Important Wirebird Area which includes the development area. This (mapped) data has been included as part of this development application.

In light of the above and as advised to the applicant prior to the development application being submitted, it was not considered necessary to do a new EIA hence the EIA submitted with this application is a resubmission of the EIA dated July 2019.

This EIA remains adequate for this development application and the Chief Environmental Officer's assessment of adequacy (as required under the Land Planning and Development Control Ordinance, 2013 Land Planning and Development Control (Environmental Impact Assessment) Regulations, 2013) also remains valid. Hence the EIA Report is considered to be adequate to allow the environmental impact of the proposed development to be assessed by decision makers. The EIA Report considered and assessed a number of impacts and recommended mitigation measures to minimise the impact. The following was included: Wirebirds, noise, air quality, water quality and hydrology, light pollution, landscape and visual and invasive and non-native species. The overall impact classification after mitigation was mostly negligible or minor with the only moderate impacts being temporary during the construction phase.

To ensure all mitigation measures are implemented to ensure the minimum environmental impact the applicant should formulate an Environmental Management Plan (EMP) and or Site Management Plan detailing how each mitigation measure will be implemented. The EMP should be submitted and approved prior to works commencing on site. The requirement for this should be included as a planning condition.

The EIA also notes that the most difficult mitigation to implement will be restoration of wirebird habitat in the wider Bottom Woods (BW) Important Wirebird Area (IWA) and highlights the lack of a Management Plan to facilitate this and asks for this to be addressed as a matter of urgency. It should therefore be noted that a draft Management Plan for the BW IWA has now been produced along with Management Plans for the other 4 IWAs and these will be taken out for public consultation in the next few months.

Property Services:

No Boundary has been demarcated as of yet

Saint Helena Airport Limited (SHAL):

The Saint Helena Airport Limited have been in communication with the Chief Planning Office and has made recommendations for controlling of lighting conditions for the Light Lantern above the central tower. The lighting plan for the overall site has been checked and there are no consider with the intended scheme.

The St Helena Fire and Rescue Service:

The St Helena Fire and Rescue Service will need to have sight of a scale plan, for the installation of passive and active firefighting media, for this building, including an operational fire hydrant/s that complies with the minimum requirements in accordance with the UK fire hydrant regulations

Heritage Society:

The Heritage Society would like to see a strategy for future use of the existing prison buildings and will be pleased to assist SHG in researching, formulating and consulting on suggestions to maximise their future use as the historic asset that they are.

[Officer comment: This is not a matter for this current application to consider. If a development application is submitted for the existing prison comments may be made and considered at that time]

LEGAL AND POLICY FRAMEWORK

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

- Coastal Zone: Policies CZ.1 & CZ.3(e)
- Social Infrastructure: Policy SI.1, SI.3
- Emergency and Public Services: Policy ES.1
- Natural Heritage: Policy NH1, NH.2, NH.3 & NH.4
- Water Supplies: Policies W.1(a) & W2
- Energy Policy: E.4 & E.8
- Sewage, storm and Drainage: Policies SD1 (a, b & c), SD3, SD.5 and SD7
- Road and Transport Policies: RT1 (a, c & d), RT3 (a & b) and RT7

OFFICER'S ASSESSMENT

Principle of the development:

The proposal for a new prison follows outline and full approvals in 2019/2020. The prison buildings approved then have yet to be constructed while an informal indication has been given that works started within the 5-year window identified as Condition 1 of full approval 2019/114.

As this application has not been submitted within the 2 year window identified in the outline approval (DA 2018/77), it is not considered to have met that approval's requirements. However, the principle of a Prison in this location has previously been considered to be acceptable, and in line with that previous decision and in the absence of any new Planning Policies or other material changes,

The proposed development as HM Prison is a building of vital National Security.

This application for full Development Consent, albeit contrary to Policy SI.3 of the LDCP which was a site specific proposal for a prison at Sundale House, Half Tree Hollow, this proposal is located on the same site as the approved new prison (under DA 2018/77 and DA 2019/113) which has been partly implemented and is similarly considered to be development which is acceptable in principle.

Details of the development:

The proposal follows the approval and part implementation of the 2018/2019 submissions which were both approved subject to conditions.

The proposal is for a prison which is needed due to the limited scale of the existing "in town" prison which has now exceeded its capacity and is not to modern standards mainly due to its age and lack of expected rehabilitation facilities.

The new prison would result in a prison which is considerably larger than the existing prison which should ensure that capacity is more than enough for the Island for the future. It is also located on land which could, if required, be extended onto (subject to meeting any requirements in place at that time). It is also provided with amenity levels which meet modern requirements from the UK Ministry of Justice (MoJ). It is considered that the new prison would be acceptable in terms of the proposed accommodation to be provided.

The proposed prison will be cruciform and, as such, would be similar to the previously approved prison. There is no concern arising from the proposed cruciform shape currently proposed.

The roof design and scale is considered to be approximately half the total height of the building and is very prominent. It is wider than the building itself as it has a large (1m wide) overhang is not traditional on St Helena, albeit other newer dwellings have overhangs and the applicants indicate it is a security feature. The roof is also proposed to be a green colour.

It is considered that the proposal would, due to the proposed excavations, be set within the existing hillside with, as currently shown, a high cut to its rear – south- (due to a gentle slope proposed to a maximum of a 15m rise – albeit not to be determined under this application). A cut above the height of the proposed building would ensure that the prison building, with a maximum height of 7.7m to the roof apex and the lantern section at a maximum height of 10.7m above ground level (at +440AD) would be “invisible” in public views from the Haul Road and from the CDA at Bottom Woods which is one reason for the prison to be set below ground level. The prison would be visible from other public viewpoints to the North, in particular along the walking trail known as Longwood Boundary and from the north-west and north-east. It is considered that given that the walks and other public viewpoints are at some distance away that the overall impact on visual amenities would be limited albeit that a significant amount of excavation is proposed.

What may be more prominent are the elements proposed to the front of the prison building including a long row of parked cars during visiting times, a bay for larger servicing vehicles, bin storage compound and the proposed above ground buildings within the servicing area. It is however, considered that the parking/loading element would be for short periods only and that the above ground ancillary servicing elements would be limited in scale such that this would not therefore result in any significant adverse impact on visual amenities in longer distance views of the valley itself.

Appendix 9 of the LDCP “Policy on the Colour of Roof Materials” indicates that “roofs of buildings in St Helena are a critical element in the appearance of development, partly because buildings have low eaves heights and result in “A lot of roof” in relation to the building’s volume. The Policy in the Appendix states “*Development permission for new buildings ...will be granted subject to conditions to control the colour of the roof as follows where the roof is to be covered in metal sheeting: ... C Where there are*

no, or few surrounding buildings, and the roof will be seen against natural surroundings, the roof shall be dark slate grey". The applicants indicate that they consider their proposed green roof in "Holly bush" tone will provide for UV resistance which is important in High UV environments like St Helena, that it will perform better and have less discolouration and will be more cost effective. The D&A Statement does not indicate why it would be better than colours of roofs which comply with the roof colour policy of the LDCP. There are however, green roofs in St Helena, including on buildings in The Briars (French buildings) and there are others in Jamestown (near Maldivia) as examples. The Roof colour policy was brought in to place *"to blend buildings into the natural landscape that surrounds them"*; the natural environment here would mainly be the existing soil colour of red/rust but the Policy indicates roofs in a dark slate grey colour would be more suitable. Given that most galvanised/powder-coated or vinyl lamination can resist weathering for many years, it is not considered that a particular colour is better than those indicated in the current policy, as suggested by the applicants. Notwithstanding, the Policy is intended as a starting point for planning decisions and although Planning Officers consider the proposal would be technically contrary to the policy, the building would mainly be set below ground level from the surrounding ground such that it is not considered that it would be so visually unacceptable as to refuse Development Consent on this ground alone, in particular given the generally hidden nature of the proposed development. LDCA Members will need to decide whether the prison is a bespoke building where the proposed stone walling and a green roof would be acceptable and would not set a precedent; otherwise, the proposed roof colour could be considered for refusal on its own or a condition could be attached to require the roof colour is in line with roof colour policy (a suitable proposed condition has been attached for consideration).

Car parking is proposed for 40 spaces in two areas. This is the same amount as previously approved and it is considered that it would meet the requirements for the prison such that it would not result in overflow parking on the access road or on the public highway in accordance with LDCP Policy RT.7.

The proposed prison would utilise energy efficient design including the use of solar lights and natural ventilation in line with LDCP Policy E.4.

While a CMP was submitted with the earlier applications, the applicant has not submitted a Conservation Management Plan (CMP) as part of this current application. In line with comments from the Chief Environment Officer, a condition is proposed to be attached requiring the submission of a Environmental Management Plan (EMP) or

Site Management Plan prior to works starting on site, in particular to ensure that the wirebird population within the Important Wirebird Area (IWA) in which the prison is located is both not harmed and also can be encouraged to nest/forage and also to ensure that the Coastal Zone is mitigated as much as possible.

In concluding, the development application is supported subject to conditions being attached in accordance with relevant policies of the LDCP.