# Environmental Impact Assessment of the draft Island Development Plan: Non-Technical Summary

February 2015





# **NON-TECHNICAL SUMMARY**

# 0.1 Environmental Impact Assessment and the Island Development Plan

The Island Development Plan (the Plan) is a Development Plan prepared by the Environment Department, which, once adopted by the States of Guernsey, will replace the Urban Area Plan (2002) and Rural Area Plan (2005). It provides for the future economic, social and environmental development needs of the Island in land use terms in a way that conserves the special features of its environment, makes good use of its resources, and offers a good quality of life. Figure 0.1 shows the plan structure.

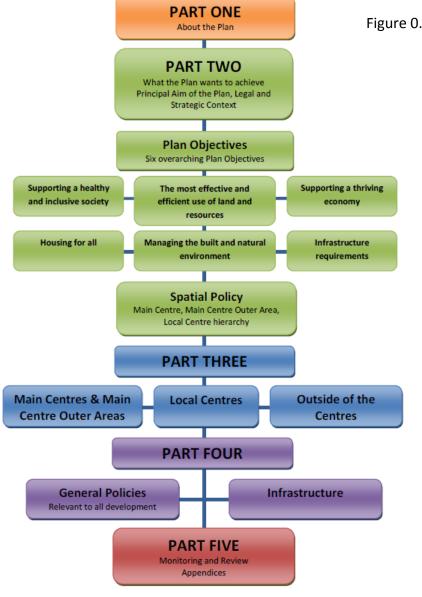


Figure 0.1: Structure of the Island Development Plan

This report is a non-technical summary of the Environmental Statement (ES) which sets out the findings of the Environmental Impact Assessment (EIA) process for the Island Development Plan. Not all parts of the draft Island Development Plan require assessment.

The EIA only assesses those selected policies that are identified as enabling certain development, often of large scale, likely to have significant environmental impacts. Given that the selected policies identified for assessment are only those which could enable development which could itself require EIA, most of the assessed policies' environmental impacts will inevitably be neutral or negative: these developments, because of their type, generally involve land take, generate additional vehicle movements, impact on the landscape and biodiversity, etc. Notwithstanding this, however, all development on the Island will be subject to all the relevant policies of the Plan, once adopted, including the environmental protective policies which are not assessed as part of the EIA, including Policies GP8 on design, GP9 on sustainable development, GP3 on Areas of Biodiversity Importance and GP5 on Protected Buildings.

The Land Planning and Development (Environmental Impact Assessment) Ordinance, 2007 (the Ordinance) only requires the assessment of Plan policies that could give rise to development that itself requires EIA. The EIA aims to ensure that these policies are sustainable and fully considers likely significant environmental effects. The ES describes the current environment in Guernsey, identifying environmental objectives, considering alternative policy approaches to those set out in the draft Island Development Plan, identifying any likely significant environmental impacts of implementing these policies and suggesting ways in which negative impacts could be avoided or minimised.

The draft Island Development Plan (the draft Plan) was prepared between January 2012 and January 2015 and involved several rounds of consultation and preparation of background reports. The EIA of the draft Plan was carried out by the Environment Department in consultation with appropriate experts which helps to provide external views and an objective assessment of the draft Plan. This is Guernsey's first EIA of a Development Plan.

## 0.2 Policy, Legal and Environmental Context

**Policy & legal**: The Land Planning and Development (Guernsey) Law, 2005 (the Law) aims to protect, enhance and facilitate the sustainable development of Guernsey's physical environment. The States' Strategic Plan includes four Island Resource Plans which describe how the States will manage or influence the use of Island resources. One of these is the Strategic Land Use Plan, which sets out a 20-year agenda for land use planning in Guernsey and guides and directs the Environment Department in the preparation of Development Plan policies. The Environment Department has a statutory duty to seek to achieve the purposes of the Law and the objectives set out in the Strategic Land Use Plan and where they conflict, to find a balance so far as possible.

In preparing the ES relating to the Environmental Impact Assessment of the draft Plan, the Environment Department must include relevant national and international standards or guidance or requirements under other applicable legislation e.g. requirements of Guernsey legislation under other parts of the planning legislation, waste, water, health and safety, energy, shipping and harbours and maritime.

**Population**: Guernsey has a population of about 63,000 people. This rose by about 5% in the last ten years. The Island's population is aging. Although several hundred people migrate to and from Guernsey every year, this number is small compared to the Island's overall population. Of about 26,000 homes on the Island, 62% are owner occupied, 27% are rented, and most of the rest are social housing. Overall there is a States target of 300 new dwellings (planning permissions) per year and although targets have until now been met, recent research into housing need shows a growing requirement over the life of the Plan.

**Fauna and flora**: Of Guernsey's land area, 6% is woodland, 5% is dense scrub, 21% is dry grassland and 3.6% is open natural habitat (mostly dune grassland, coastal grassland and marshy grassland). According to the Habitat Survey (2010), Guernsey's biodiversity declined significantly between the years 1999 to 2010, mostly due to the abandonment of land and its succession to scrub or woodland, and related declines in rarer habitats.

**Soil, waste and landscape:** Almost 12% of Guernsey's total land area is developed. Most of the Island's high quality soil is in the south and west. In 2012, 31% of household waste was recycled, 16% was composted and 53% was sent to landfill at Mont Cuet: this is slightly below the European target. Of commercial and industrial waste, 28% was recycled, 15% was composted, 20% was incinerated and 37% went to landfill. The proportion and total amount of waste being sent to landfill is slowly decreasing.

**Water:** Water use has remained roughly steady over the last five years. About half of water use is for households and half commercial. Surface water nitrate concentration has decreased by about half over the last ten years and is much better than European

standards. Water quality at beaches is good. Several areas of the Island are at risk from coastal flooding, including St Sampson's Harbour.

Air and climatic factors: Levels of nitrogen oxides – caused mostly by vehicles – are generally within World Health Organisation standards but exceed the standards at times at some busy roadsides, notably the Grange, St Peter Port and Bulwer Avenue, St Sampson. While air pollution levels are increasing in places, the air quality for the Island as a whole still remains good. Greenhouse gas emissions reduced by almost 20% between 1999 and 2008-2012, going further than Guernsey's international commitments. Almost all this drop took place in 2001 when electricity started to be imported from France via a cable link. Except for this large decrease, greenhouse gas emissions as a result of power generation have generally increased.

Material assets: Guernsey has a rich heritage which includes burial mounds, standing stones, mediaeval road patterns, fortifications, protected buildings and Conservation Areas. Guernsey is very well-catered for in terms of outdoor recreational space (sports pitches, allotments, etc.), natural space (woodlands, meadows, etc.) and beaches. Most of the Island's surveyed formal open spaces and areas of outdoor recreation are in the northern part of the Island. There is a distinct deficit of parks and play spaces in the south and southwest of the Island. Play spaces often cater for younger children but not teenagers.

Table 0.1 summarises the Island's strengths, weaknesses, opportunities and threats (SWOT) in terms of environmental baseline.

Table 0.1. SWOT table for Guernsey

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#### Attractive environment

Local distinctiveness, e.g. earthbanks, ormers, Guernsey cow

Strong historical/archaeological legacy

Mild climate: pleasant to live in, ability to support a wide variety of agricultural production

Wealth of informal open spaces, e.g. beaches and recreational facilities

Water resources (no need for desalination for foreseeable future)

Good rates of recycling

#### Weaknesses

Heavy reliance on private motor vehicles

Reliance on imports, including fuel (current arrangements are high risk)

Small scale, i.e. limited land, unable to be food sufficient

Air pollution hot spots

Lack of formal coastal management

Legacy of horticultural industry (redundant glasshouse sites)

Declining biodiversity, in part due to the abandonment of land and its succession to scrub or woodland

CO<sub>2</sub> emissions not reducing

Limited amount of formal play areas, especially for older children

#### **Opportunities**

Greater public access to open space/visual open space

Renewable energy, in particular tidal

Brownfield redevelopment

Remediation of contaminated land

Contribution of clearance of redundant glasshouse sites to agriculture or open land

New Sites of Special Significance designations to protect and enhance the Island's areas of special interest including biodiversity, botanical, zoological, scientific, archaeological, historical, cultural, geological and other special interests

Energy efficiencies – improved sustainable design and construction

#### Threats

Loss of agricultural land, e.g. use for horses Decline of biodiversity due to inappropriate development, recreation, etc.

Complacency re. CO<sub>2</sub> emissions

Aging population

Climate change, including coastal flooding

## 0.3 Assessment methodology

As Stated in section 0.1, not all parts and policies of the draft Island Development Plan require EIA. The Ordinance only requires the assessment of Plan policies that could give rise to development that itself requires EIA. Other Plan policies, for instance those on good design or public art, do not need to be assessed.

The EIA Ordinance requires an assessment of population, fauna, flora, soil, water, air, climatic factors, material assets (including architectural and archaeological heritage) and landscape. Air and climatic factors were considered together, since emissions of greenhouse gases are also air pollution emissions.

Two levels of assessment were carried out: a strategic assessment for broad, non- site specific draft policies and a site-specific assessment for specific projects referred to in the draft policies or supporting text. The draft policies' impacts were assessed in comparison to current conditions. The following symbols were used:

++	very positive impact compared to the current situation	-	negative impact compared to the current situation
+	positive impact compared to the current situation		very negative impact compared to the current situation
+/-	positive and negative impacts are broadly equal	? or 0	impact unclear or no impacts

The assessment was carried out on the basis of site visits, overlay maps of constraints, background reports and the planning team's knowledge of the Island. Tables describing the likely impact of typical development projects were developed and provided a basis for the policy assessments.

Table 0.2 shows the policies in the draft Plan that could give rise to each type of EIA development, and so those policies whose impacts, in particular in relation to the likely significant environmental effects of development enabled by those draft policies, have been assessed in this report.

Table 0.2 Potential projects subject to EIA, and draft Plan policies that could lead to such projects

Potenti	al projects subject to EIA: EIA	Draft Policies potentially leading to EIA		
Ordina	nce Schedule	development <sup>1</sup>		
1(a)	A site for the disposal or	S5 Development of Strategic Importance		
	processing of waste	S6 Strategic Opportunity Sites		

<sup>&</sup>lt;sup>1</sup> For more details on existing and envisaged development proposals, see section 5 of this Environmental Statement.

Potent	ial projects subject to EIA: EIA	Draft Policies potentially leading to EIA		
	ance Schedule	development <sup>1</sup>		
		MC10 Harbour Action Areas		
		IP2 Solid Waste Management Facilities		
		IP5 Safeguarded Areas		
1(b)	Reservoirs for public water	S5 Development of Strategic Importance		
±(ω)	supply, waste water plants or	S6 Strategic Opportunity Sites		
	sewage treatment plants	IP2 Solid Waste Management Facilities		
	sewage treatment plants	IP5 Safeguarded Areas		
1(d)	Quarries, or the extraction of	S5 Development of Strategic Importance		
±(α)	minerals by quarrying, mining or	S6 Strategic Opportunity Sites		
	drilling	IP5 Safeguarded Areas		
1(f)	Reclamation of land from the	S5 Development of Strategic Importance		
±(ι)	sea	S6 Strategic Opportunity Sites		
	Sca	MC10 Harbour Action Areas		
1(g)	Non-domestic installations for	S5 Development of Strategic Importance		
1(8)	production of energy (excluding	S6 Strategic Opportunity Sites		
	wind power of 1 turbine)	OC7 Redundant Glasshouse Sites OC		
	wind power or 1 turbine)	IP1 Renewable Energy		
		IP11 Small-scale Infrastructure		
1/h)	Water management projects for			
1(h)	Water management projects for	S5 Development of Strategic Importance		
	agriculture	OC5 Agriculture OC OC6 Horticulture OC		
1/:\	Now self sources and alteretions	IP11 Small-scale Infrastructure		
1(j)	New golf courses and alterations	GP2 Sites of Special Significance OC9 Leisure and Recreation OC		
1/1/	to existing golf courses			
1(k)	Airport runways	S5 Development of Strategic Importance		
		IP4 Airport Related Development		
2/2)	A not allowed a management in a transfer of the attention	IP5 Safeguarded Areas S2 Main Centres		
2(a)	Any development project not			
	falling within Schedule 1,	S3 Local Centres S4 Outside of the Centres		
	including any business parks or			
	industrial estates or retail or	MC2/LC2 Housing		
	leisure development, where the	MC3/LC3/OC2 Social and Community		
	area of the development exceeds 1 hectare	MC4/MC5/LC4/OC3 Office, Industrial, etc.		
	exceeds 1 nectare	MC6/MC7/LC5/OC4 Retail		
		MC8/LC6/OC8 Visitor Accomm. in MC/MCOA		
		MC9/LC7/OC9 Leisure		
		MC10 Harbour Action Areas		
		MC11 Regeneration Areas		
		OC7 Redundant Glasshouse Sites OC		
2/1.1	Construction of	IP4 Airport Related Development		
2(b)	Construction of roads, harbours	S5 Development of Strategic Importance		
	and port installations	S6 Strategic Opportunity Sites		
		MC10 Harbour Action Areas		
		IP3 Main Centre Port Development		

Potenti	ial projects subject to EIA: EIA	Draft Policies potentially leading to EIA		
	nce Schedule	development <sup>1</sup>		
		IP6 Transport infrastructure		
		IP9 Highway Safety		
2(c)	Works to provide new coastal	S5 Development of Strategic Importance		
	defences and sea defences and	MC10 Harbour Action Areas		
	reconstruct existing defences	IP10 Coastal Defences		
2(d)	Any infrastructure project, not	S5 Development of Strategic Importance		
	falling within Schedule 1 or any	S6 Strategic Opportunity Sites		
	other item of this Schedule,	MC10 Harbour Action Areas		
	which is of island-wide	IP1 Renewable Energy Production		
	significance	IP2 Solid Waste Management Facilities		
		IP3 Main Centre Port Development		
		IP6 Transport infrastructure		
		IP9 Highway Safety		
		IP12 Crematoria and Burial Sites		
2(e)	Any project on, or which may	S5 Development of Strategic Importance		
	affect, a Ramsar site	S6 Strategic Opportunity Sites		
		GP2 Sites of Special Significance		
2(f)	Waste management projects for	S5 Development of Strategic Importance		
	agriculture	OC5 Agriculture OC		
		OC6 Horticulture OC		
		IP2 Solid Waste Management Facilities		
		IP11 Small-scale Infrastructure		
2(g)	Installations for the slaughter of	MC10 Harbour Action Areas		
	animals	IP2 Solid Waste Management Facilities		
2(h),	Installations for the storage of	S5 Development of Strategic Importance		
2(i)	natural gas (>1,000kg) and/or	S6 Strategic Opportunity Sites		
	petroleum, petrochemicals or	MC10 Harbour Action Areas		
	other hazardous chemicals	GP17 Public Safety and Hazardous		
- (1)	(>10,000 litres)	Development		
2(j)	Any change or extension to any	S5 Development of Strategic Importance		
	development of a description	MC10 Harbour Action Areas		
	set out in Schedule 1, or	IPS Safeguarded Areas		
	paragraphs (a) to (i) of this	IP6 Transport Infrastructure		
	Schedule	IP8 Public Car Parking		
		IP9 Highway Safety		
		IP11 Small-scale Infrastructure		
Soc	Any change or extension to any	IP12 Crematoria and Burial Sites		
Sec.	Any change or extension to any	GP2 Sites of Special Significance		
40(5)	development of a description set			
	out in Schedule 1, or paragraphs			
	(a) to (i) of Schedule 2, where			
	planning permission has already been given for that development			
	or that development has already			
	or that development has already			

Potential projects subject to EIA: EIA	Draft Policies potentially leading to EIA
Ordinance Schedule	development <sup>1</sup>
been carried out or is being	
carried out, and the change or	
extension may have significant	
adverse effects on the	
environment	

<sup>\*</sup> The Land Planning and Development (Environmental Impact Assessment) Ordinance, 2007

#### 0.4 Alternatives

As part of preparing the draft Plan, alternative policy approaches were considered by the Environment Department. Research and consultation on the options informed the decisions which have led to the selected draft Plan policies as proposed. For example, options on the approach to affordable housing policy looked at five different ways to deliver this policy during the Key Messages, Issues and Options consultation in July 2013. The EIA process involves the identification of those selected draft Plan policies that could give rise to projects that themselves require EIA. As part of the assessment of these identified draft selected policies, the Environment Department must also assess the environmental impacts of reasonable policy approach alternatives in comparison as it is required to set out the implications for the environment of the policy choices. These alternative policy approaches can include the option of not having a policy of the kind envisaged at all ('no policy' option).

A wide range of alternatives to the identified selected draft policies was considered as part of EIA. Some were discounted early on for reasons set out in the ES. For instance the 'no policy' option was discounted for draft policies where this approach was contrary to the guidance or direction given by the Strategic Land Use Plan. Similarly, the alternative of not allocating certain sites for development would contravene the guidance and direction of the Strategic Land Use Plan. Other alternatives were more comprehensively assessed and compared: these are listed at Table 0.3 where the final, selected policies are shown shaded in blue.

Alternatives can be a complete replacement for the selected policy, an addition to the policy approach or a variation of one element of the selected policy. For example, the alternative of allocation of land for new housing in Local Centres would be an addition to the selected policy approach in the draft Plan of housing allocations in Main Centres and Main Centre Outer Areas rather than a replacement. However, allowing new offices within Local Centres only through conversion or homeworking would be a variation on an element of the selected draft Plan policy. Generally the selected draft policies and sites in the draft Plan were chosen because they are more clearly consistent with the Strategic Land Use Plan, and are more sustainable and/or provide a better fit with the draft Plan's aim and objectives.

**Table 0.3 Alternatives considered in more detail** (The selected draft Plan policies identified for assessment are shaded in blue)

Plan topic	Alt	ternatives considered in more detail
Main Centres	•	Support development within and around the Main Centres by
		demarcation of boundaries for Main Centres and Main Centre Outer
		Areas
	•	No demarcation of Main Centre boundaries
Local Centres	•	Designation of six Local Centres
	•	Designation of more Local Centres
	•	Designation of fewer Local Centres
Housing	•	Allocation of land for housing to meet the majority of the 5 year
		supply within Main Centres and Main Centre Outer Areas only; allow
		new housing of appropriate scale in Local Centres through windfall
		development to sustain the community; Outside of Centres as
		appropriate, allow new housing through the conversion and subdivision of existing buildings only.
		Allocation of sites for housing within Local Centres
Office, industry,	•	Support new and refurbished offices primarily in Main Centres and at
•		Admiral Park; and allow new offices in Local Centres where they are
storage and		of an appropriate scale
distribution	•	Selected policy approach except in local centres, allow new offices
uses		only through conversion or home-working
	•	Within Main Centres and Main Centres Outer Areas, consolidate
		Industry, Storage and Distribution uses on Key Industrial Areas (KIA)
		at Longue Hougue, Northside, Pitronnerie Road and Saltpans and
		allow for future expansion at these locations; support existing premises outside these areas to continue operation or allow change
		of use to another appropriate use
	•	Provision made for industry, storage and distribution uses within
		Main Centres /Main Centre Outer Areas through policy alone, no KIA
		or Key Industrial Expansion Areas
	•	Outside of Centres, support for existing operations and support for
		limited development of offices through conversion of redundant
		buildings and home working; development of industry/storage uses
		requiring such a location through conversion of redundant buildings
		or redevelopment of appropriate brownfield or redundant
		glasshouse sites and allow new industrial and storage and
		distribution uses at designated site at La Villiaze, Forest.
	•	Outside of the Centres support limited development of small
		workshops/ yards only on redundant glasshouse sites
	•	Outside of the Centres allow development of industrial and storage/
		distribution uses on greenfield land
Regeneration	•	Support and highlight as opportunity sites Regeneration Areas at
Areas		Lower Pollet, South Esplanade and Mignot Plateau, Mansell Street/

Plan topic	Alternatives considered in more detail		
	Le Bordage and Leale's Yard		
	Designation of different sites as Regeneration Areas		
Visitor accommodation	<ul> <li>Support new visitor accommodation in Main Centres and Main Centre Outer Areas; and in Local Centres and Outside of Centres but only where of an appropriate scale and created through the change of use of existing buildings or the conversion of redundant buildings. Change of use of away from visitor accommodation only supported in exceptional circumstances. Campsites supported outside of the centres.</li> </ul>		
	<ul> <li>Allow new visitor accommodation within the Main Centres and Main Centre Outer Areas only through conversion of existing buildings</li> <li>Selected policies, excluding the provision of campsites</li> </ul>		
Agriculture Outside of the Centres	<ul> <li>Support agricultural development, allow diversification of existing farmsteads to include ancillary uses and resist the loss of existing agricultural holdings within Agriculture Priority Areas (APAs); other uses can be considered within APAs as appropriate and there is provision for existing agriculture to continue outside of the APA, however loss of existing farmsteads outside of the APAs will not be resisted</li> </ul>		
	<ul> <li>Allow only agricultural development within APAs, and no such development outside the APAs</li> <li>No designated Agriculture Priority Areas</li> </ul>		
Horticulture Outside of the Centres	<ul> <li>No new holdings but support improvements to existing commercial horticultural holdings, on the condition that any new structures permitted must be removed when no longer required</li> <li>Allow minor works to existing horticultural operations, but no new holdings</li> </ul>		
	Allow development of new horticultural holdings		
Redundant glasshouse Sites Outside of the Centres	<ul> <li>Support clearance and return of redundant glasshouse sites to agricultural use, other open land, or to other uses such as clearance for use as curtilage and redevelopment for industrial/ storage uses; proposals for renewable energy or outdoor formal and informal recreation uses and informal leisure uses as appropriate to their location</li> </ul>		
	<ul> <li>Only allow for return of redundant glasshouse sites to agriculture or limited inclusion within curtilage</li> </ul>		
Retail	<ul> <li>Support new comparison and convenience retail in Main Centres including identifying core retail areas within Main Centres where the approach supports retail but allows other uses that contribute to vitality and viability. No new comparison retail outside of the Main Centres. Support new convenience retail in Main Centre Outer Areas and in Local Centres of an appropriate scale. Support for improvements to existing convenience and provision for works to support existing comparison retail operations. Outside of the</li> </ul>		

Plan topic	Alt	ternatives considered in more detail
		Centres, there is provision for new convenience retail in coastal locations through conversion of existing buildings and provision to
		extend and alter existing convenience retail in these locations.
		Outside of the Centres there is provision to make minor
		improvements to support current operations.
	•	Identify 'primary' and 'secondary' retail areas within the Main
		Centres and Main Centre Outer Areas
Social and	•	Support improvements to existing sites and new social/community
community		facilities in Main Centres and Main Centre Outer Areas and Local
facilities		Centres where existing sites are not available/suitable; Loss of
		facilities will only be supported where it is demonstrated the facility
		can be replaced on appropriate site or is no longer required and its
		loss would not adversely impact on the vitality and viability of the
		centres. In Local Centres proposals must be of an appropriate scale
		for the Local Centre concerned and not undermine Main Centres.
		Outside of the Centres support for new facilities only through
		conversion of existing buildings; improvement to existing facilities
		where they are of an appropriate scale and do not undermine the
		centres.; and change of use of facilities considered where facility is
		no longer required or provided adequately within the centres.
	•	Allocation of sites for social and community use
Leisure and		• Support leisure and recreation development in Main Centres, and
recreation		development in Main Centre Outer Areas and Outside of the
		Centres of appropriate scale depending on the category of Leisure
		or Recreation use. Support development in Local Centres of an
	appropriate scale. Change of use of away from leisure or	
		recreation use only supported in limited circumstances.
	•	Allow any leisure and recreation development within and around
		Main Centres
	•	Allow leisure and recreation development in Agriculture Priority
		Areas which have not been proven unviable
Development of	•	Support Development of Strategic Importance as defined where
Strategic		there is no better alternative site. Support Strategic Opportunity
Importance and		Sites as defined where the proposal meets a States objective and
Strategic		the site is obsolete or underused
Opportunity Sites	•	No requirement to demonstrate lack of availability of an alternative,
JILES		more suitable, site
	•	No requirement for the site to be obsolete or underused in its current form
Harbour Action	•	Designate St Peter Port and St Sampson harbours as Harbour Action
Areas and Main		Areas and support development and redevelopment there subject to
Centre Port		Local Planning Briefs. In the interim of delivering a LPB, development
Development		that would not prejudice the delivering of LPB, will be considered
		against policies of the Plan

Plan topic	Alternatives considered in more detail		
	No designation of Harbour Action Areas		
Renewable energy	<ul> <li>Encourage renewable energy installation where it can be satisfactorily incorporated into an existing development, on brownfield land, or involves the use of appropriate redundant vineries, and is not on commercial agricultural/ open land.</li> <li>Requirement to remove equipment and structures and restore the land once the development is no longer required or obsolete may be applied</li> </ul>		
	<ul> <li>Encourage renewable energy installations on primary agricultural land</li> <li>Allow renewable energy installations only on redundant glasshouse sites</li> </ul>		
Waste management facilities	• Support development to implement the Waste Strategy and provision for certain proposals which may emerge as a result to be considered as Development of Strategic Importance where appropriate to enable an exception to the Spatial Policy where no suitable alternative site exists. Recognise and support Mont Cuet and Longue Hougue as areas for a waste management facilities; , direct new development proposals to Key Industrial Areas and their Expansions Areas; support for improvement to other existing waste management facilities outside these designated areas will be considered on case by case basis in line with States objectives. For those intended for personal use, direction to locate these facilities within centres where possible and preferably close to other existing community facilities.		
	<ul> <li>No new waste management facilities, and no extension or alteration to existing facilities beyond Longue Hougue</li> </ul>		
Small scale infrastructure	<ul> <li>Support new small scale infrastructure where it contributes to efficient and sustainable infrastructure, but only if sharing of facilities is not possible</li> </ul>		
	<ul> <li>Support small scale infrastructure, 'encouraging' (rather than 'requiring') it to be shown that sharing of existing facilities, etc. is not possible</li> </ul>		
Highway safety, accessibility and capacity	<ul> <li>Consider the road network's ability to cope with increased traffic resulting from development, and require appropriate road alteration and/or an impact management scheme if needed</li> </ul>		
	<ul> <li>No requirement for alterations to the highway or the implementation of a management scheme</li> </ul>		
Public car parking	<ul> <li>Within Main Centre and Main Centre Outer Areas, provision of new public car parks will not be supported except as part of a comprehensive development scheme brought forward through a Local Planning Brief for a Harbour Action Area and in accordance with States Strategies; support for the relocation of existing parking in the Main Centres where it decreases the negative impact of the</li> </ul>		

Plan topic	Alt	ternatives considered in more detail
		motor car on the Main Centres; temporary car parks on vacant sites
		will not normally be permitted; and outside of the Main Centre and
		Main Centre Outer areas, proposals will be assessed on case by case
		basis
	•	Allow a net increase in public car parking spaces within Main Centres
		and Main Centre Outer Areas, beyond the Harbour Action Areas
	•	Direct public car parking from the Main Centres to the Main Centre
		Outer Areas
	•	Allow temporary car parks on vacant sites proposed for development
Crematoria	•	New crematoria and burial sites to be treated as Developments of
		Strategic Importance and support for extensions and improvements
		to existing facilities within their site
	•	No new sites allowed for crematoria or burials
Airport related	•	Support operational airport development and prohibit any
development		development which would prejudice the effective, efficient and safe
		operation of the airport. Support airport related uses where it
		complements and supports efficient and effective airport operations
		and provides economic benefits using a sequential test for sites
		within airport land, followed by immediately adjoining and lastly
		followed by those near the airport where appropriate.
	•	Do not employ a sequential test regarding proximity of development
		to the airport
	•	Only allow airport-related development within the airport boundary
Public safety /	•	Require a risk assessment for potentially hazardous developments
hazardous		which sets out measures to address any risks, with no support for
development		proposals that are unacceptably risky to public health and safety.
		Additional controls may be applied over proposals within identified
		Public Safety Areas.
	•	Consider risks to the environment as well as to public health or safety
Safeguarded	•	Safeguarded areas shall be protected from any development that
areas		may compromise their future implementation for strategically
		important development. Designate Safeguarded Areas at Les Vardes,
		St Sampson's, Chouet Headland, Vale and land to the east of the
		airport
	•	Not designating a Safeguarded Area adjacent to the airport but using
		a policy alone to prevent development that may compromise future
		of strategic transport link (no alternative pursued for the other areas
		as specifically directed to designate those sites by the Strategic Land
Sites of Special		Use Plan)  Designate 0 Sites of Special Significance (SSS's) for outstanding
Sites of Special Significance		Designate 9 Sites of Special Significance (SSS's) for outstanding botantical, scientific and zoological interest, with development in
Significance		SSSs permitted only where it would not have a significant impact on
		the SSS's special interest or impacts can be mitigated
	•	Designate all former Sites of Nature Conservation Importance as SSSs

#### 0.5 Assessment

As stated in section 0.1, the draft Plan aims to provide for the future economic, social and environmental development needs of the Island, in land use terms, in a way that conserves the special features of its environment, makes good use of its resources, and offers a good quality of life. The EIA only assesses those selected draft policies that are identified as enabling certain development, often of large scale, likely to have significant environmental impacts. Given that the selected draft policies identified for assessment are only those which could enable development which could itself require EIA, most of the assessed policies' environmental impacts will inevitably be neutral or negative: these developments, because of their type, generally involve land take, generate additional vehicle movements, impact on the landscape and biodiversity, etc. Notwithstanding this, however, all development on the Island will be subject to all the relevant policies of the Plan, once adopted, including the environmental protective policies which are not assessed as part of the EIA, including Policies GP8 on design, GP9 on sustainable development, GP3 on Areas of Biodiversity Importance and GP5 on Protected Buildings.

In order to establish the likely significant environmental impacts resulting from the selected draft policies, reference was made to four existing project level EIAs, as follows:

**Extension to Les Vardes Quarry**: Permission was granted for this proposal which will involve extending the life of the existing quarry by eight years and removing a further 1.27 million tonnes of granite from 4.65Ha of land. The main environmental impacts are set out in the ES of 2008.

The draft Plan includes Chouet Headland as a possible site for mineral extraction (Policy IP5). A similar list of impacts is possible for mineral extraction at Chouet Headland, as included within the draft Plan, but the significance of the impacts is likely to be different due to the different opportunities, constraints and characteristics of that site.

**Works to the runway at Guernsey Airport**: Works to the runway, including upgrading the runway and provision of grass Runway End Safety Areas at both ends of the runway, were carried out in 2012-2013. The main environmental impacts are set out in the ES of 2011.

The draft Plan includes a policy which safeguards an area for an extension to the airport runway (Policy IP5). This could have similar impacts to those described in this ES in particular those which would apply to all major runway construction/works.

**Temporary loading dock and storage at Longue Hougue**: Works to allow importation of aggregate, cement, bitumen and equipment for the runway works at the airport, including a pontoon, hopper and mobile conveyer system, an open storage area, a concrete batching

plant and office facilities, were carried out in 2012-2013, in conjunction with works to the airport runway. The main environmental impacts are set out in the ES of 2011.

Residual waste treatment facility at Longue Hougue: A draft ES was prepared in 2010 to assess the environmental effects of development comprising a mechanical treatment recycling unit to sort materials for recycling and an energy-from-waste unit to treat the Island's domestic, commercial and industrial waste. This ES was not completed but its initial conclusions are set out in that document.

The draft Plan proposes Longue Hougue as a Key Industrial Area and Key Industrial Expansion Area (Policy MC5) and a site for waste management facilities (Policy IP2): these could have similar impacts to those described in the ES depending on the nature of the proposals which eventually come forward.

The following paragraphs give an overview of the likely significant environmental impacts of the assessed selected draft policies which have been identified as enabling development likely to have environmental impacts – further detail can be seen in Table 0.4 below.

The assessed policies' overall impacts on *population* are likely to be positive with increased housing and improved services in areas that are accessible by a range of modes of transport; regeneration of areas that are currently in poor condition; design of development, taking into account all ages and disabilities; and, improved opportunities for formal and informal recreation and leisure. However, the draft Plan says little about support for deprived areas/residents or prioritisation of housing and services for those that most need them.

The assessed policies' overall impacts on fauna and flora are likely to be significantly negative. The majority of the draft policies assessed would have negative impacts in this respect particularly because of the type of development likely to be enabled. Some of the draft Plan policies that were not assessed (because they will not enable EIA type development) aim to protect designated biodiversity sites. Several of the key developments proposed in the draft Plan – the Saltpans housing site, developments at the Saltpans KIA, Longue Hougue KIA, both Harbour Action Areas and mineral extraction at Chouet Headland – are likely to individually have significant negative impacts on biodiversity. There would also be the cumulative effect of all the proposed development and past declines in biodiversity.

The assessed policies' overall impacts on *soil* are likely to be slightly negative. The draft Plan aims to minimise the use of greenfield land and the conversion of agricultural land to other land uses. Its hierarchy of Main Centres → Main Centre Outer Areas → Local Centres → Outside of the Centres helps to ensure that land is used efficiently. However, the draft Plan

will allow for the development of large areas of currently undeveloped land. There would also be a cumulative effect of past development although Guernsey only has 12% of land currently developed.

The assessed policies' overall impacts on *water* are likely to be slightly negative. The draft Plan does not have specific policies about protection of water quality or efficient use of water resources, although the draft Plan does promote increased water efficiency through Policy GP9. Several of the key developments proposed in the draft Plan – Longue Hougue KIA, St. Sampson's Harbour Action Area, mineral extraction at Chouet Headland – have the potential to significantly affect water quality in the case of accidental leakages and most of the draft Plan policies assessed in the EIA could affect water quality through e.g. dust and siltation during construction and runoff during operation.

The assessed policies' overall impacts on *air and climatic factors* are likely to be slightly negative and, cumulatively, they are likely to be significantly negative. The draft Plan generally aims to place new development in locations that are accessible by modes other than the car and Policy IP6 on transport infrastructure supports developments that encourage a range of travel options. On the other hand, housing development in Local Centres and Outside of the Centres may generate greater vehicle use; works around the harbours that would support the use of deeper vessels could potentially increase pollution in densely populated areas; and, cumulatively, the new housing and employment sites would require more energy and thus could generate more greenhouse gases. Several key development sites – Saltpans and Belgrave housing areas, Saltpans KIA, Leale's Yard – are within or partly within flood risk areas and several other sites have lesser flooding constraints. These impacts are cumulative with existing high levels of vehicle use (and thus emissions), the emissions from the existing oil powered power station and other impacts contributing to climate change which will increase the likelihood of flooding.

The assessed Policies' overall impacts on *material assets* are likely to be mixed. New development could adversely affect the heritage – archaeology, protected buildings, protected monuments and their settings, Conservation Areas, etc. Examples are mineral workings at Chouet Headland and waste management facilities at Longue Hougue, both of which could affect protected monuments (Napoleonic towers), and the possible airport runway extension which would affect a protected building and earthbanks. On the other hand, the draft Plan has protective policies including Policies GP5 on Protected Buildings and GP1 on Landscape Character and Open Land, promotes sustainable use/reuse of materials, waste management and provision of appropriate infrastructure. It also supports a variety of economic sectors, which would help to prevent economic shocks.

The assessed Policies' overall impacts on the *landscape* are also likely to be mixed. The draft Plan supports the regeneration of underutilised land; protects open and undeveloped land by focusing development on built-up areas; supports public art; and, aims to provide a vibrant 'street scene' in the Centres. The regeneration of Leale's Yard and certain former glasshouse sites are likely to be particularly positive. On the other hand, the draft Plan would allow development of large areas of currently undeveloped land, for instance at Belgrave and potentially Outside of the Centres. Industrial development around the harbour areas has the potential to be visually unattractive at a prominent location that will be seen by many people including the first glimpse of the Island for many visitors.

Where development proposals are received by the Department for EIA type development, they will be subject to all the relevant requirements of the Ordinance and any further assessment therefore required.

Table 0.4 below summarises the likely environmental impacts of the selected draft Plan policies. Those policies shaded in grey were not assessed because they are not expected to give rise to developments subject to EIA.

Table 0.4 Summary of likely environmental impacts of Island Development Plan policies Key

+	++	very positive impact compared to the current situation	-	negative impact compared to the current situation
	+	positive impact compared to the current situation	1	very negative impact compared to the current situation
+	-/-	positive and negative impacts are broadly equal	? or 0	impact unclear or no impacts

	Population	Fauna and flora	Soil	Water	Air/climatic factors	Material assets	Landscape
Spatial Policies							
S1. Spatial Policy	+	-	0	-	+/-	+/-	?
S2. Main Centres and Main Centre Outer Areas	++	-	+/-	+/-	++/-	++/-?	++/- ?
• Town	++	-	0	0	+/-	-?	-5
The Bridge	++/-	-/	+/-	0	0	-	-
S3. Local Centres	+/++	-5	+/-	-5	-/	0?	-
• Cobo	++	0	0	0		0	?
Forest	+	0?	0	-3	0?	-?	-?
L'Aumone	++	0	0	0	0	0	0
L'Islet	+	-3	0	?	0	-?	-3

	Population	Fauna and flora	Soil	Water	Air/climatic factors	Material assets	Landscape
St. Martin	+	-	-3	0	+	-3	?
St. Pierre du Bois	++/-	-3	0	0	-	0?	0?
S4. Outside of the Centres	+/-	-	-	-	-	?	
S5. Development of Strategic	++	?	?	?	?	?	5
Importance	***	;	:		;	:	
S6. Strategic Opportunity Sites	++	}	}	?	;	;	}
Main Centres (MC) and Main Centre							
Outer Area (MCOA) Policies							
MC1. Important Open Land in MC and MCOA							
MC2. Housing in MC and MCOA	++/-	-/	+/-	-5	-	0?	+/-
Belgrave Vinery	+/-	-	-	+/-	-	-5	-
Franc Fief	+/-	-5	+/-	-	0	0	-
La Vrangue	+/-?	-3	-3	-3	+/-	0?	-
Les Pointues Rocques	+/-	0	+/-	-	0	0	-
Saltpans	++/-		-?	-	-	0	-
MC3. Social and Community Facilities in MC and MCOA	++	0?	0?	0?	+/-	+	0?
MC4. Office Development in MC and MCOA	+	-	+/-	0	+/-	++/-?	++/-
Admiral Park	++/-	0	0	0	-	_	0
MC5. Industry, Storage and	+/-	-	+/-	-3	-/?	+/-	+/-
Distribution in MC and MCOA	-		-			-	-
Longue Hougue KIA	0		-,		0	+/0?	-3
Northside KIA	+	- ;	0	-3	-5	- ;	-
Pitronnerie Road KIA	- 5	0?	-?	-3	0?	0?	0/-
Saltpans KIA	0		-,	-5	-	0?	+/-
MC6. Retail in MC	+	0?	0?	0?	+/-	+	+/-
MC7. Retail in MCOA	+	0?	0?	0?	+/-	+	+/-
MC8. Visitor Accommodation in MC	0?	-3	0	-?	_	0	-3
and MCOA						_	
MC9. Leisure and Recreation in MC and MCOA	+/-;	-3	0	-	-	+	-3
MC10. Harbour Action Areas	++/-	-	+	-	-	?	++
St. Peter Port HAA	+/-		+	-/?	-3	?	-/?
St. Sampson's HAA	+/-	}	0?	5	5	?	-/?
MC11. Regeneration Areas	++	-	++	-	-	?	++
Leale's Yard	+	-	+/-	-?	-3	0?	++
Local Centre (LC) Policies							

	Population	Fauna and flora	Soil	Water	Air/climatic factors	Material assets	Landscape
LC1. Important Open Land in LC							
LC2. Housing in LC	++/-	-/	+/-	- 5	-	0?	+/-
LC3. Social and Community Facilities in LC	++	0?	0?	0?	+/-	+	0?
LC4. Offices, Industry and Storage and Distribution in LC	+/-	-	+/-	-?	-/?	+/-	+/-
LC5. Retail in LC	+	0?	0?	0?	+/-	+	+/-
LC6. Visitor Accommodation in LC	03	-3	0	-3	-	0	-5
LC7. Leisure and Recreation in LC	+\-5	-3	0	-	-	+	-5
Outside of the Centre (OC) Policies							
OC1. Housing OC							
OC2. Social and Community Facilities OC	++	0?	0?	0?	+/-	+	0?
OC3. Offices, Industry and Storage and Distribution OC	+/-	-	+/-	-3	-/?	+/-	+/-
OC4. Retail OC	+	0?	0?	0?	+/-	+	+/-
OC5. Agriculture OC	0	0	0	0	0	+	0?
OC6. Horticulture OC	0	0	+/-	-5	++/-	+	+/-
OC7. Redundant Glasshouse Sites OC	+	-/0	+	0	?	0	++
OC8. Visitor Accommodation OC	0?	-5	0	-?	-	0	-?
OC9. Leisure and Recreation OC	+/-;	-?	0	-	-	+	-?
General Policies	,						
GP1. Landscape Character and Open Land							
GP2. Sites of Special Significance	?	-5	0?	-	-5	-3	-?
GP3. Areas of Biodiversity							
Importance							
GP4. Conservation Areas							
GP5. Protected Buildings							
GP6. Protected Monuments							
GP7. Archaeological Remains							
GP8. Design							
GP9. Sustainable Development							
GP10. Comprehensive Development							
GP11. Affordable Housing							
GP12. Protection of Housing Stock							
GP13. Householder Development							
GP14. Home Based Employment							
GP15. Creation and Extension of							

	Population	Fauna and flora	Soil	Water	Air/climatic factors	Material assets	Landscape
Curtilage							
GP16. Conversion of Redundant Buildings							
GP17. Public Safety and Hazardous Development	+/-	0?	0?	0?	0?	0?	0?
GP18. Public Realm and Public Art							
GP19. Community Plans							
GP20. Exceptions							
Infrastructure Policies							
IP1. Renewable Energy Production	++/-	3	0	-	+	+/-	-/
IP2. Solid Waste Management	. /		. /		. 1	. /	
Facilities	+/-		+/-	-	+/-	+/	-
Longue Hougue	0/-	-	-?	-	0	+/-	-
Mont Cuet	0	0	?	-5	0	0	0/+?
IP3. Main Centre Port Development	++/-	-	+	-	-	?	++
IP4. Airport Related Development	-	-5	-	-?		-3	-?
IP5. Safeguarded Areas	++/-	-		?	-	-	-
<ul> <li>Chouet Headland, mineral extraction</li> </ul>			0/?	0/?	-		-
<ul> <li>Les Vardes Quarry, water storage</li> </ul>	?/+	+/-	++/-?	++/-	+/-	+	0
<ul> <li>Runway extension on land east of the airport runway</li> </ul>	-	-		-		-	-3
IP6. Transport Infrastructure and Support Facilities							
IP7. Private and Communal Car							
Parking							
IP8. Public Car Parking	+/-	+/-	+/-	-3	+/-	+/-	++
IP9. Highway Safety, Accessibility	. /			0	. /	. /	
and Capacity	+/-		-	0	+/	+/-	
IP10. Coastal Defences	++	-/?	-/?	-/?	0	+/-	-?
IP11. Small-Scale Infrastructure	++/-		0?	0?	+/-	+/-	-/?
Provision			U:	U:	T/-	T/-	·
IP12. Crematoria and Burial Sites	+/-	-	-	-	-	+	?
Le Foulon	+/-	0	0	0	-	-?	-5

#### 0.6 Mitigation

The Environmental Impact Assessment process led to three types of suggested mitigation measures:

- 1. Suggested changes of wording to individual draft Plan policies and their supporting text to make them clearer, more internally consistent and more sustainable. For instance, the assessment suggests changes of wording to make the policies for Main Centres, Main Centre Outer Areas and Local Centres more consistent; identifies where some policies could better mention environmental constraints or objectives; and, suggests possibilities for environmental enhancements, such as new walking/cycling paths. Many of the recommendations were found to be adequately covered elsewhere, either within the draft Plan or in other legislation or would be addressed at a more detailed level later in the planning process (see point 2 below).
- **2.** Suggestions for matters that should be included in any Environmental Statements for projects emerging from the Plan policies. These included, for instance, suggestions for specific walking/cycling routes or planting.
- **3.** Strategic suggestions for improving the overall sustainability of the relevant draft Plan **policies.** Table 0.5 shows the key strategic recommendations of the EIA and the response to these recommendations.

Table 0.5 Strategic suggestions for improving the Plan's sustainability

Recommendation	Response to recommendation
To stress its	The structure of Part Two of the draft Plan changed significantly
importance, begin the	partly in response to this recommendation. Part Two now contains
plan with a policy on	six objectives supporting the principal aim of the draft Plan. The
sustainable	first of these, Plan Objective 1, promotes the provision of
development; and	sustainable development that will make the most effective and
expand the definition	efficient use of land, with the prudent use of natural resources,
of sustainable	whilst protecting and managing the natural and built environment.
development in Policy	In the draft Plan, the importance of sustainable development is a
GP9 to also	key theme throughout the document with both the Strategic Land
protecting	Use Plan and purposes of the Law seeking to achieve sustainable
biodiversity and	development. However, achieving sustainable development is
minimising pollution.	addressed through the draft Plan across several policies rather than
	relying solely on GP9.
	The first policy of the draft Plan, the Spatial Policy, concentrates
	development within and around the edges of the Main Centres with
	some limited development within and around the edges of the
	Local Centres which consolidates the majority of social and
	economic activity in the areas that have the best access to public

Recommendation	Response to recommendation
	transport and services and reduces the need to travel by car. This approach helps to reduce the Island's contribution to greenhouse gases. It also seeks to mitigate the impacts of climate change through greater resource efficiency. The draft Spatial Policy and other draft Plan policies work in unison to address sustainable development and promote the prudent use of natural resources and ensure that the physical and natural environment of the Island is conserved and enhanced.
	In the draft Plan, sustainable development is defined as meeting the needs of the present generation without harming the ability of future generations to meet their own particular needs, which is consistent with the definition as agreed by the States of Guernsey in the Strategic Land Use Plan.
Consider turning Northside (St Sampson) into housing, tourism and/or retail rather than industrial, to take better advantage of the site's central	The Development Proximity Zone at Northside currently restricts other forms of development there. Both the Visions for the Bridge and the Ports Masterplan highlight the potential of this area for waterfront living or improved tourism/heritage. The Ports Masterplan suggested relocating the Northside industry to Longue Hougue, allowing the Development Proximity Zone to be removed.  However, this would involve the agreement of several parties and
and attractive location	co-ordination of several States Departments and Strategies, which would take some time and is uncertain. Even with an agreement, it would take a long time - beyond the plan's life - to achieve such a transition. As such it would not be appropriate for the Department to designate this land for housing or any other purpose than its current use for industry at this time.
Give greater importance to flooding as a key social and economic risk.	The Strategic Land Use Plan provides guidance to the Environment Department on climate change adaptation and particular direction on the approach to development and flood risk. It directs the Department not to adopt a blanket approach of no development within areas prone to flooding but rather develop an approach that assesses the risk on a case by case basis and to enable the opportunities for harnessing of investment through development where appropriate to improve defences and thereby reduce the flood risk to the new and existing developments.
	The draft Plan requires that development should be located and designed appropriately and subject to risk assessment, and that a full exploration of opportunities to harness investment from development proposals within flood risk areas should be carried out. It also expects new and existing building stock in flood risk areas to be constructed or modified in such a way as to be more resilient to the impacts of climate change. As a result of this

Recommendation	Response to recommendation
	approach, there are several key development sites within vulnerable areas.
	It is considered the importance of flooding and climate change adaptation is properly reflected in the policies of the draft Plan and no change to the approach or policies is required.
Include policies that more robustly discourage car use and encourage	The draft plan takes into account and enables support of the 'Integrated On-Island Transport Strategy' (2014) which encourages a shift from cars to walking and cycling.
walking, cycling and public transport	In addition to this strategy the draft Plan encourages better walking and cycling connections; sets maximum car parking standards for Main Centres and Main Centre Outer Areas to discourage car use; and allows for Park and Ride projects as developments of strategic importance for reasons of sustainability. However, a balance must be struck between providing an appropriate level of car public parking to enable convenient access to shops and services, employment sites and existing uses particularly in the Centres and the need to reduce car dependency. The Department considers the Plan policies have struck the appropriate balance without amendment.
In Local Centres, promote better place making and increased accessibility to services	The draft plan does support better place making in local centres, for instance improvements to the public realm and allowing for appropriate development. The draft plan also introduces the mechanism to deliver community plans which allows members of a community to set out a vision for improvements to a particular locality.
Promote enhancement of biodiversity, not just minimisation of impacts	The draft Plan promotes enhancement and protection of biodiversity by introducing Sites of Special Significance designations which protect and enhance where possible areas of outstanding botanical, scientific or zoological interest; and Areas of Biodiversity Importance for areas of more local biodiversity importance where the biodiversity impacts of development will be carefully assessed and mitigated and with enhancement of biodiversity through development where possible. These, together with the identification of Important Open Spaces, will form a series of informal green wedges and a green corridor effect within the Main Centres and Main Centre Outer Areas. Development Frameworks for larger sites also require consideration of enhancement of biodiversity.
Give greater support to onshore wind power in the supporting text to policy IP1.	The supporting text to IP1 focuses on onshore solar and offshore wind, but the policy wording supports all forms of renewable energy provisions. No change is needed.

#### 0.7 Next steps

The Environment Department expects to publish the draft Plan in February 2015. The draft Plan together with the Environmental Statement and this Non-Technical Summary will be made available at the Greffe and at other appropriate public places for public inspection, and for purchase at the offices of the Environment Department at Sir Charles Frossard House, La Charroterie, St Peter Port, GY1 1FH.

The draft Plan and the Environmental Statement will be considered by independent Planning Inspectors through a public inquiry. The Inspectors will invite written representations from the public on the draft policies and the ES following publication of the draft Plan and ES by the Department. The Public Hearing stage of the Inquiry is expected to be held in Autumn 2015. The Inspectors will then submit a report to the Environment Department setting out their conclusions and recommendations including any recommended changes to the draft Plan. These will be considered by the Environment Department in finalising the plan. The draft Island Development Plan together with other documents including the Environmental Statement and the Inspectors' report is expected to be considered by the States in 2016 and once the Plan is adopted it will immediately come into effect.

Further environmental assessment of the draft policies may be needed if the draft Plan changes significantly in the following stages prior to adoption. Once the Island Development Plan is adopted, its impacts (including environmental impacts) will be monitored quarterly and annually.