



Appendix A

Consultation Responses

Table A.1 Consultation responses: Oral and written responses recorded during stakeholder workshops

Section	Environmental objective	Assessment criteria	Indicator	Workshop comments	Response (include or do not include comment) / Action
1 Population	Supporting the role of the main and local centres as socially inclusive and diverse communities and neighbourhoods	Protect and enhance existing population centres	Is the site located in a Main or Local Centre?	Potential use of site after completion should be considered; and future development not precluded.	Do not include – Future uses of the site are an important consideration but will not be included within the High Level EIA assessment as they are a mitigation factor, for consideration at a more detailed stage. High Level EIA serves primarily to identify environmentally-poor options and scope them out.
				Impact on tourists & visual impact on people/aesthetics should be considered.	Include – create tourism as a separate section including relevant criteria and indicators(s)
				Consider population outside main & local centres.	Do not include – populations outside of local centres may be affected in other ways, but not in terms of pressure on public services or demographic changes.
				Some delegates did not consider this criteria relevant	Do not include – criteria is relevant in order to take into account the built environment into which the development will be placed. Update explanation of criteria to explain why: retained as it capture changes to structure and function of the population centres.
		Protect and enhance existing public services (school, hospital, etc.)	Is the site located adjacent to / on the access route of school, hospital, etc.?	Minimising distance from source to disposal inevitably means a location in/close to urban, populated areas.	Noted
				Some delegates did not consider this criteria relevant	Do not include - (retain row) Update explanation of criteria - retain. NB: General point regarding indicators - often we've selected very high level indicators, e.g. 'is a receptor present or not?' These are necessarily high level at this stage.
		Protect and enhance the provision of social infrastructure	Does the site contribute to provision of social infrastructure?		
	Support maintenance and enhancement of access to indoor and outdoor recreation	Protect and enhance existing outdoor recreational spaces	Is the site located adjacent to/on access route of parks, play areas, etc.?	Indicator: Will it impact or enable recreational activities?	Do not include - Use of a recreational space is more relevant for detailed EIA, so not included here.
				Increased impact in high housing density areas?	Do not include - Housing has been scoped out as the strategic option selected will not affect the Island's housing provision as housing provision is a determined

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	Maintenance and enhancement of modern key strategic infrastructure	Protect key infrastructure	Is the site located in Development Proximity Zone, Airport Public Safety Zone, etc.? How many buried or overhead service assets are within/adjacent to the site?		by the Island's administrative, demographic and economic influences.
				"How many" buried/overhead services is not the main issue – should consider "how important"	Include – important point, consideration of the importance of the infrastructure will be included within the assessment. Importance will be determined by national significance of the infrastructure.
				Ensure protection of the sea outfalls and tidal flows around the end to ensure effective dispersion.	Include - this receptor should be included as an indicator here.
2 Flora and Fauna	Conserve and enhance key local, regional and internationally important species, habitats and sites	Protect and enhance internationally designated sites for nature conservation	Is the site located within or adjacent to a Ramsar site?	Not just Ramsar - potential impact on sensitive oyster beds (commercial interest), or Maerl bed 'hot spots' and other marine habitats/species and/or recreation.	Include - a separate fisheries section in 'economy' above. Oyster beds however will not be included within nature conservation. However oyster beds are not relevant for flora and fauna. Include – maerl bed hotspots are an important receptor and will be included in Flora and Fauna. However note that detailed assessment of these features will be more relevant at detailed EIA stage.
		Protect and enhance Sites of Special Significance	Is the site located within or adjacent to a Site of Special Significance?	Options for offsetting may be appropriate.	Do not include - Offsetting is at the bottom of the mitigation hierarchy - we would consider this only after on site (and offsite) mitigation. Not relevant for consideration at this stage
				Should this include nature reserves managed by La Société etc?	Include - will include non-designated La Société Guernésaise reserves under 'protect and enhance biological network, if information is available
		Protect and enhance Areas of Biodiversity Importance (ABI), incl. the foreshore	Is the site located within or adjacent to an ABI?	"Maintain" instead of "Protect"	Include - minor ABI text change.
				Delete "adjacent to" an ABI	Do not include - 'adjacent to' text - habitats adjacent to a development site would be potentially subject to effects.
		Protect and enhance biological networks	Will the site provide opportunities for ecological enhancement? Will the site result in habitat	Include important species and habitats, even if not protected by Guernsey legislation?	Do not include – 'notable' species should include those which are important but not subject to legal protection.

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			loss for notable species?		
3 Soil and ground conditions	Encouraging brownfield development in the interests of the most effective and efficient use of land	Utilise existing brownfield land	Is the site, wholly or partially, located on a brownfield/redundant glasshouse site?	Consider topography constraints/impact on capacity.	Do not include – technical constraints are not detailed EIA constraints.
				Encouraging brownfield development is more about sustainability than effective use of land.	Include - amend text to consider sustainable uses of brownfield land (as opposed to all available uses)
		Protect best and most versatile land	Is the site located on best and most versatile land in active agricultural use?	Indicator should be “Is it an Agriculture Priority Area?”	Include - change to next to APA from BMVL.
		Protect land with other economic uses	Is the site on land reserved for stone extraction?		
	Management of solid and liquid waste	Minimise the risk of contamination	Is there a risk of ground contamination at the site?	Consider receptors adjacent to the site at risk of contamination/run-off/leaching e.g. oyster beds.	Do not include – the high level EIA looks at sensitive receptors in proximity to the options, rather than impact pathways. I.e. oyster beds as a receptor are considered as an indicator in Flora and Fauna
				Mass of inert waste affecting hydrogeological pressure - forcing contaminants out.	Include - although de facto included within assessment.
	Ensuring the physical and natural environment of the Island is conserved and enhanced	Minimise the risk of soil erosion	Do any factors give rise to a risk of soil erosion?		
		Minimise the risk of coastal erosion	Are there any factors present on site which may give rise to a risk of coastal erosion?	Should include condition of sea bed beyond high water spring tide level; and/or impact on coastal processes	Include - coastal process section will be created with criteria and indicator(s). This will include near shore coastal processes.
				Consider broader impact on marine environment, including tidal flows - where site is coastal	Include - coastal process section will be created with criteria and indicator(s). This will include near shore coastal processes.
				Criteria: Minimise the risk of coastal erosion and contamination, including physical	Do not include – this is covered under previous criteria
		Protect areas of geological importance	Are any areas of geological importance present?	Rare geological features should be considered.	Include – include rare geological features in

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4 Water	Wise management of Island resources such as water	Protect and enhance existing water bodies (including streams)	Is there a water body / course present within the site?	Include preferential pathways, in / out	Include - preferential pathways will be considered in the high-level environmental appraisal under this criterion.
				Criteria: expand scope to include catchment area	Do not include - catchment area was not included, as the use of it is being phased out.
				Needs a criterion to consider hydrogeology / aquifers.	Include - hydrogeology an omission from criteria. Include specific hydrogeology criteria and indicator(s).
				Consider opportunities to expand water catchment.	Include – text change to criterion
				Should include presence of boreholes/wells.	Include - boreholes should be included within 'protect water supplies criteria' as an extra indicator.
		Protect existing water supplies	Is the site reserved for water storage? Is the site located in an area of existing high demand?	Criteria: should stipulate “potable” water	Include – text change to criterion
				Guernsey Water storage strategy very important	Do not include - GWS noted, but objectives of the GWS covered by criteria used here.
				Should consider positive protection of land reclamation for low lying areas.	Do not include - positive effects of land reclamation already covered under flood risk
		Maintain or reduce level of flood risk	Is the site located within an existing flood defence? Is the site located in an area at risk from a 1 in 10 year or greater flood event?	Consider all forms of flooding, e.g. surface water drainage, coastal inundation, sewer.	Not relevant – all forms of flooding already included within baseline
				Opportunity to incorporate flood defence as part of solution.	Include – this enhancement opportunity will be included within high level environmental assessment process
	Ensure bathing water quality is acceptable	Maintain & improve bathing water classification at island beaches	Is the site adjacent to / upstream of a classified bathing water?	Inert waste won't impact bathing water as not bacterial.	Do not include - bathing water is a European classification, we are looking at material changes to this classification only. Other receptors sensitive to water quality (e.g. maerl beds) to be considered under other topics i.e. Flora and Fauna)
				Criteria could be sea water rather than bathing water.	
				Seawater quality around whole coast not just beaches.	
5 Air/climatic factors	Ensure air is safe and breathable	Maintain or improve ambient air quality	Is the site next to an air pollution hotspot? Would potential site access routes pass through an air pollution hotspot? Do	Should include noise monitoring.	Do not include – whilst an important issue, noise is detailed, site specific issue, with no strategic policies in place to manage it at the strategic scale. Noise will be considered at detailed EIA
				Dust management criteria (to be controlled via waste	Include - dust effects reference in criteria. This will

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			opportunities for air pollution mitigation measures exist?	management licence).	include dust effects rather than specific receptors. Detailed EIA will assessment potential smothering / N2 deposition effects upon e.g. ecological designations.
				Extend to wider environment/wildlife/habitats.	[See dust comment above]
				Should include oxide(s) of nitrogen and oxide(s) of sulphur.	Do not include – Nitrogen oxides (NOx) and Sulphurous oxides (SOx) are already included in the baseline.
				Objective: Delete “for Island residents”.	Include – acceptable minor rewording of objective
				Criteria: “improve ambient air quality” instead of “reduce air pollution levels”.	Include – acceptable minor rewording of objective
	Greenhouse gas emissions	Limit the increase in greenhouse gases arising from inert waste management	Will use of the site lead to an increase in greenhouse gas emissions?	Add specific values to assessment criteria.	Do not include – specific values will be used for detailed EIA, high-level EIA considers the issue at a broad scale only
				Opportunity to make things better. Including educate companies/developers to reduce inert waste.	Do not include - opportunities to improve are an unrealistic expectation for high level EIA.
6 Material assets (including architectural and archaeological heritage)	Ensure protection of the historic environment, but as part of the wider task of balancing economic, social and environmental objectives	Protect protected buildings and their interpretation (setting)	Is the site on or adjacent to a protected building?	Indicators need to reflect positive as well as negative.	Include - positive as well as negatives are captured within the indicators, however they will be reviewed to ensure that this is the case (it is the case for the example selected here).
				Considering effect on tidal flow and/or geomorphology for future tidal developments	Include - coastal processes will be included, as detailed above.
		Protect protected monuments and their interpretation (setting)	Is the site on or adjacent to a protected monument?	"Adjacent" should be more specific.	Include - define term adjacent within report body text
		Protect Conservation Areas and their interpretation (setting)	Is the site on or adjacent to a Conservation Area?	Include marine environment	Include - marine heritage should be included, and criteria and indicators will be included for non-designated marine heritage, where information is available.
				Criteria: delete “setting”	Do not include - Suggest retain 'setting' - very important to landscape effects of historic environment.

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				Indicator: delete “or adjacent to”	Do not include - retain 'adjacent to' text, but clarify term as per above.
		Protect area of archaeological interest	Is the site within or above an area of archaeological interest? GIS - others?	Factor in marine heritage	Include - marine heritage should be included, and criteria and indicators will be included for non-designated marine heritage, where information is available.
	Ensure protection of open spaces	Protect and enhance existing open spaces	Is the site on or adjacent to Important Open Land?	Indicator – include any impacts on areas of important open space.	Do not include - 'Important open land is a States term, and has a specific use in this context.
7 Landscape	Ensure protection of important landscapes	Maintain landscape character	Are there any distinctive landscape features that contribute to the wider landscape character and local distinctiveness of the area present within the site? (Is the scale of the site commensurate to the surrounding infrastructure?)	Consider the scale of impact on character.	Not relevant – scale of impact already considered within the baseline
				Consider possible long term benefits and offset potential.	Do not include – see above regarding offset potential. Long term benefits are included as part of the high level EIA.
				Consider surrounding infrastructure part of landscape character.	Not relevant – surrounding infrastructure included (at the broad scale) in the high level EIA
				Criteria: “Maintain and enhance landscape character and the area”.	Do not include - 'enhance' was intentionally drop from this criteria as it is not possible to enhance the character, as character is not largely a quality wrought from intended actions. Landscaping of a site may provide other benefits, but they will not enhance 'character'.
				Objective: Define "important landscape" better.	Include – define what is an 'important landscape' with baseline. In short, important landscapes are those defined in the 2013 Study for their distinctive qualities.
				Must balance against NIMBY-ism.	Do not include - 'NIMBY factor' not an environmental concern therefore not relevant to the High Level EIA process.
		Maintain and enhance protected trees	Are there any tree protection orders located within the site?	Criteria – delete “and enhance”.	Include - remove 'enhance'.

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		Maintain existing views of wider landscape	Are there any important viewpoint locations adjacent to the site?	Check predefined viewpoint locations are right/adequate.	Include – stakeholder feedback on the key viewpoints for inclusion is required to influence the detailed EIA.
				Consider impact of final form on iconic views, skyline, etc.	Do not include – impact on views from non-designated viewpoints. (e.g. gateways, skylines, etc.) will be included I detailed assessment for detailed EIA.
				Criteria: Should include "gateway locations".	Include – include a reference to the gateway locations (i.e. island entry points) in baseline.
				Indicator: Include other views across / into / out of site.	Do not include – detailed assessment of view is an detailed EIA issue,
8 Transport and access	Maintenance and enhancement of modern key strategic infrastructure	Maintain traffic flow around the island	How many major roads will fall within the site access routes? Is the site on or adjacent to a key island entry / exit point?	Maintain highway safety and traffic management	Include - traffic safety should be referred to in criteria
				Consider potential of development to improve transport hubs, including harbours	Include – consideration of transport hubs will be included in the high level EIA under this indicator
				Consider any negative/positive impacts on infrastructure from completed development	Include – included above in terms of 'strategic infrastructure'
				Consider long term solution - develop a new off island airport runway.	Include - although included the 'gateways' indicator below.
				Consider any potential of impact of development on strategic routes and/or sea channels/harbour access.	Include - access to Island 'gateways' included as a new indicator
				Consider whether site located near accident black spot or area of traffic congestion?	Do not include - point about traffic congestion / blackspot - covered elsewhere.
		Maintain and enhance provision of Ruettes Tranquilles	Is the site located on a Ruelle Tranquille?		
	Support the maintenance and enhancement of access to indoor and outdoor recreation	Maintain and enhance the provision of recreational access	Is the site located on a public footpath?	Objective/criteria: Should be more general, e.g. public access, rather than specifically recreation.	Include - changes terminology to refer to 'public access'.
				Objective: Overlaps with population so not required.	Do not include – there is certainly some overlap here, but the receptors are different so included separately.
				Criteria: Consider schools and existing residential	Do not include – school and existing residential are covered in 'population'.

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				Indicator: Include opportunity to improve footpaths / access.	Not relevant – opportunities for improvement will be included in high level EIA.

Table A.2 Consultation responses: Written responses following circulation of the Stakeholder Consultation document

Consultee	Section	Comment	Response / Action
Traffic & Highway Services	8 Transport and access	I would recommend a question be included on [potential impact on vulnerable road users (pedestrians and cyclists)] because HGV movements could significantly impact on vulnerable road users if a site is chosen where nearby roads suffer from a lack of pedestrian or cycle facilities.	Include – include as an indicator – ‘is a cycle route located nearby?’, and include cycle routes in the baseline. Pedestrians covered already in recreational routes.
Environment Guernsey Ltd	2 Flora and Fauna	Such considerations extend far beyond any particular site. The local context is important. For example, a site might only support small populations of certain species but this might contribute to the maintaining of viable island populations or reducing population fragmentation and isolation. Also, some species can be encouraged by very simple and cost-effective measures e.g. specific nestboxes or certain habitat management as part of site aftercare or design.	Do not include – specific provisions are important, and will be considered at detailed EIA.
Environment Guernsey Ltd	5 Air Quality and Climatic Factors	I suggest extending the limit to at least 2km offshore. This is similar to the other themes and also does not dismiss air quality issues which may affect the local marine environment.	Include – consideration of dust emissions upon the marine environment is important, accept the proposal to extend the study area.
Environment Guernsey Ltd	7 Landscape	Views extend far beyond 2km. This theme could be extended to 5 or 10km.	Include – long distance view are important, and agree that views from up to 10km would be an appropriate study area.
Guernsey Water	4 Water	Whilst there may be no material impact on bacteriological water quality attributable to inert waste as a source, land reclamation would impact on tidal flows which may have the potential to increase the impact of other bacteriological sources. In conjunction with Intertek, Guernsey Water has developed a coastal water quality model to assess the impact of both point and diffuse sources on seawater quality. If land reclamation were considered Intertek should be consulted on the need to recalibrate their tidal model and assess whether there are any bathing water quality implications of changes to tidal dispersion.	Include – include reference to this effect within the baseline. Not relevant for the high level EIA, but ensure Intertek are consulted for detailed EIA.

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