

## Phase 2 Land Use Plan Review Call for Sites Assessment

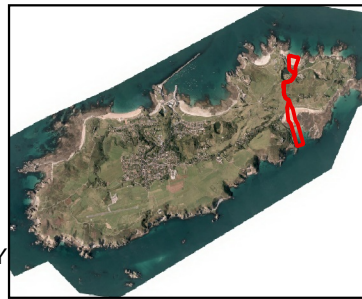
**Reference:** PA/088

**Site name:** Route between Corblets Bay and Longis Bay (FAB Link)

**AY Parcel(s):** AY 1838, AY 1836, AY 1840, AY 1841, AY 1842

**Submission Type:** Use/development

**Source:** Private



**ARUP** STATES OF ALDERNEY



### Proposals

#### Summary of respondent's proposal:

Subsea interconnector cable connecting France and Great Britain via Alderney known as the France-Alderney-Britain (FAB) Link project. Planning permission is required from the States of Alderney for the section of the cable which is proposed between the Mean Low Water Line (MLWL) at Corblets Bay to the north of the Island and MLWL at Longis Bay to the south of the Island.

#### Planning history and other context:

This site overlaps with:

- SA/059 which proposes the designation of the area for green waste and materials storage.
- SA/069 which proposes the redevelopment of the land at Mannez Quarry to accommodate the State Works Department.
- PA/063 which proposes the use of the site for preservation of nature (including butterfly farm), heritage tourism and recreation (including climbing school).
- PA/089 which proposes the formalisation of the existing Longis Nature Reserve as a planning criteria, plus proposed extension of the reserve.
- PA/098 which proposes the continued zoning of the land currently designated as Protected Zone.
- PA/109 which proposes the protection of the Longis anti-tank wall, bunkers, and the Nunnery, reflecting their role in the occupation of the Island during World War II.
- PA/110 which proposes the protection of Longis Common, reflecting its role in the occupation of the Island during World War II.

### Accordance with the Land Use Plan Evidence Base

Does the proposal accord with the Vision Statement?	Partial	<p>The proposal partially accords with the vision, which seeks to maximise opportunities to become a diverse and balanced economy and promote resilient infrastructure systems. The proposal may provide a 'route to market' for the export of tidal energy and improved ICT connectivity through the carrying of fibre-optic cables. At this stage the scale of the 'route to market' benefit is unquantified and the ICT connectivity unspecified.</p> <p>However, the proposal would be located in the Designated Area and in proximity to important biodiversity and heritage assets and therefore does not accord with the guiding principles of a community which protects and sustainably manages its environment, adopts an integrated and holistic approach to land use or values, protects and sustainably manages its built and cultural environment.</p> <p>The proposal partially accords with the vision, which seeks to maximise opportunities to become a diverse and balanced economy and promote resilient infrastructure systems. The proposal may provide a 'route to market' for the export of tidal energy and improved ICT connectivity through the carrying of fibre-optic cables. At this stage the scale of the 'route to market' benefit is unquantified and the ICT connectivity unspecified.</p> <p>However, the proposal would be located in the Designated Area and in proximity to important biodiversity and heritage assets and therefore does not accord with the guiding principles of a community which protects and sustainably manages its environment, adopts an integrated and holistic approach to land use or values, protects and sustainably manages its built and cultural environment.</p>
Does the proposal accord with the Housing Strategy?	Partial	<p>Due to the extensive works that would be required to construct the proposal, there will likely be an uplift of temporary off-Island labour. Some additional labour may also be required to ensure the operation of the scheme on a permanent basis. The Housing Strategy recognises that this temporary workforce will require adequate accommodation and by their very nature, this housing need is likely to be high capacity, short term and low value. Recommendation 10 states that a policy should be introduced in the Land Use Plan which requires proposals for large schemes to submit an 'Employment Strategy' as part of the planning application for both construction and operation phases of the development. As part of a future planning application, it is expected that an Employment Strategy would be submitted to demonstrate how workers would be accommodated on the Island.</p>

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Does the proposal accord with the Economic Development Strategy?	Partial	<p>The Economic Development Strategy recognises that there may be opportunities to harness large scale renewable energy generation (Recommendation 85), such as tidal power and recommends that the Land Use Plan supports sustainable electricity generation (Recommendation 51). It should be noted that whilst not the primary purpose of the FAB Link development, the harnessing of renewable tidal energy could be provided as an ancillary benefit.</p> <p>The Strategy recommends an overarching major infrastructure projects policy be included in the Land Use Plan (Recommendation 79), which could provide support for major infrastructure projects subject to applicants demonstrating:</p> <ul style="list-style-type: none"> <li>- the need for the scheme including the benefits to Alderney as a whole; and</li> <li>- rationale for the location of the proposed scheme including the 'reasonable alternatives' must be considered having regard to technical, economic, social and environmental considerations.</li> </ul> <p>Given the scale of the FAB Link proposal it is considered to fall within the definition of a major infrastructure project and therefore, at a high level, the need for the proposal and the reasonable alternatives considered should be considered as part of the Call for Sites process.</p> <p>The need for the proposal, including the potential benefits to Alderney, is considered to have been demonstrated at the strategic level. The proposed FAB Link interconnector is a European Project of Common Interest (PCI) under the provisions of EU 347/2013: Regulation on guidelines for trans-European energy infrastructure (TEN-E Regulation) and it is included in the ENTSO-E 10-year network development plan. The inclusion of the FAB Link interconnector in the PCI list and the ENTSO-E network development plan is indicative of the importance of the project at a European level.</p> <p>In addition, in August 2013, the States of Alderney Policy and Finance Committee issued a press release stating that <i>"it is recognised that Alderney faces a unique predicament in terms of the production of clean, low cost, secure energy supplies. The long-term future is known even if the precise timing is unsure - Alderney Renewable Energy is developing a project to deliver tidal power and/or deliver power from an interconnector which will link France and the UK."</i> Following this, the States of Alderney Strategic Plan (2014) was 'received' (as opposed to approved) by States Members on the 15 January 2014. The Strategic Plan includes a high level Energy Plan which provides <i>"support [for] FAB cable project"</i> reflecting the objective for the Island to become <i>"100% energy self sustained from renewable sources in five years."</i></p> <p>The Alderney Economic Development Study (Frontier Economics, Draft final report, August 2014) also identified the following opportunities related to FAB Link:</p> <ul style="list-style-type: none"> <li>- <i>"Developing tidal power and the FAB interconnector offers economic and job opportunities in Alderney (e.g. research opportunities and administration);</i></li> <li>- <i>Alderney is only likely to capture a small part of the economic return, but the potential rewards are large, including the potential for licensing revenues;</i></li> <li>- <i>Working with France on the project could develop new tourism markets;</i></li> <li>- <i>By reducing electricity prices and improving ICT connectivity, FAB could increase Alderney's competitiveness as a business location."</i></li> </ul> <p>Notwithstanding the above, further justification would be required as part of a planning application on the benefits the proposal would bring to the Island since the delivery of the FAB Link scheme does not guarantee tidal energy for Alderney nor improved ICT connectivity.</p> <p>The Strategic Plan (2014) does not spatially fix the cable location and therefore support for the project is subject to the applicant demonstrating that the proposed location is acceptable. This is supported by Section 5 of the Strategic Plan, which identified that 'zoning' and 'green belt' (Designated Area) considerations need to be taken into account and that it is critical that the balance of the "natural eco-system and the commercial drivers of the island" is maintained. Therefore, consideration of the proposed location on-Island must be taken into account including the 'reasonable alternatives'.</p> <p>The proposal, subject of Call for Sites submission PA/088, states that no converter hall is required in Alderney for the purposes of the FAB Link interconnector. However, the submission states that the proposed interconnector cable would be run via Alderney <i>"where it is intended to enable connection to a future power station [converter hall] being developed by ARE"</i> (subject of Call for Sites submission reference PA/087). The Call for Sites submission PA/088 states that <i>"owing to the small population, energy consumption on Alderney is relatively small and the vast majority of energy generated from the Alderney tidal resources will need to be exported and consumed in the rest of Europe and therefore needs a 'route to market'. The FAB project will provide that route, and the FAB Link interconnector has been routed via Alderney for this reason alone."</i></p> <p>In terms of the broad location for the proposal, The FAB France Alderney Britain Interconnector: Offshore Environmental Report (December 2016) states that <i>"a direct route around Alderney was discounted as this would not meet the objective of providing a route to market for the power from Alderney. It would be technically possible to lay the FAB cables around Alderney and for the tidal generation subsequently to connect into them. However, an offshore converter station would be required which would be significantly more expensive than the proposed arrangement."</i> However, it is unclear why this means that the interconnector cable needs to cross Alderney and why the cable could not be routed to land at a single point on the Island. This does not appear to have been considered. It is expected that a number of 'island touching' (rather than crossing) routes would be considered as part of a future planning application. Further information was requested on this matter from the submitter but none was forthcoming. Without this information, it is not possible to determine at this stage whether the proposed solution for meeting the need is appropriate or whether there are other alternative solutions which could be adopted.</p>
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Site name: Route between Corblets Bay and Longis Bay (FAB Link)

<p>Does the proposal accord with the Economic Development Strategy? (continued)</p>	<p>With regard to the specific location of the proposed development, the technical work submitted in support of the Call for Sites submission has considered alternatives for the proposed landfall locations and the route alignment.</p> <p>With regards to landfall options, the Desktop Study of France-Alderney Cable Route (Wood Group Kenny, February 2014) and Desktop Study of Alderney-Britain Cable Route (Wood Group Kenney, October 2014) identify the shortlisted landfall locations based on techno-economic considerations (so, the technical and economic considerations of the promoter/developer). It should also be noted that section 4.1.4 of the Desktop Study of France-Alderney Cable Route (Wood Group Kenny, February 2014) report sets out that the study brief was to, where possible, focus on land owned by the States of Alderney. These reports concluded that the preferred landfall options are at Corblets Bay and Longis Bay.</p> <p>In October 2016, the Building and Development Control Committee previously advised FAB Link Ltd that consideration of on-land social, economic and environmental factors needed to be taken into account in determining the appropriate landfall options. The FAB France Alderney Britain Interconnector: Offshore Environmental Report (December 2016), which was submitted in support of the FEPA licence application to the States of Guernsey, included a summary of social and environmental criteria for the different landfall options (page 3-8). This latter assessment confirmed that for the France – Alderney route, Longis Bay is the preferred landfall. The assessment concluded that “the seabed when entering the bay is composed of sand which should facilitate cable burial. The seabed conditions and bathymetry would enable the cables to be landed via either open-cut trench or HDD [horizontal directional drilling]. It also provides the shortest distance to the northern landfall. Although it is within the Longis Nature Reserve, making it unfavourable in terms of environmental constraints, it is less sensitive than the landfall options within the Alderney West Coast and the Barhou Islands Ramsar Site which is of international importance for ornithological reasons.” For the Alderney-Britain route, the Report concluded that <i>“it was decided to proceed with Corblets Bay as it offered two potential technical options for landing - either via an open-cut trench or HDD”</i>. Additional information was also requested around the social, economic and environmental factors considered to provide more justification on these locations. No further information had been received at the time of writing.</p> <p>With regards to route alignment across the Island, limited information on the reasonable alternatives has been provided and whether the proposed route represents the most appropriate solution. The Call for Sites submission states that <i>“by far the shortest route between Longis Bay and Corblets Bay is the route across Longis Common. Therefore, project sustainability requirements determined that unfavourable engineering challenges or insurmountable environmental constraints must be present to justify any significant lengthening of the route.”</i> Further information was requested from the submitter, specifically with regards to what the <i>“project sustainability requirements”</i> comprise and therefore how they have informed decisions made. Additional information was also requested around the social, economic and environmental factors considered to provide more justification on these locations. No further information had been received at the time of writing.</p> <p>In the absence of further information on the reasonable alternatives considered for the broad location of the scheme (e.g. island touching versus island crossing) it is not considered possible to determine at this stage whether the proposed location for the development is suitable relative to the other potential options. Should further technical work conclude that crossing Alderney is the most suitable, it is not considered that a sufficiently balanced assessment of the landfall locations and route for the cable crossing the Island has been undertaken in order to determine whether the proposed location represents the most appropriate location.</p> <p>With regards to accordance with the other relevant parts of the Economic Development Strategy, Recommendation 27 states that the Land Use Plan should support a range of types of tourism and corresponding range of tourism accommodation particularly supporting niche tourism markets. The two preferred landfall options at Longis Bay and Corblets Bay will directly impact upon key beaches in these locations, in terms of land take during the construction phase. The construction works may also indirectly impact upon these tourism resources through visual, noise, air quality and construction traffic impacts, resulting in a loss of amenity for users of the beach. The assessment of the scheme against the Housing Strategy has concluded that there may be increased pressure on short term, low value accommodation as a result of additional labour requirements on the Island during the construction phase. A combination of these issues may result in harm to the tourism market on Alderney due to a lack of available tourism accommodation, during the construction phase of the scheme.</p>
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Does the proposal accord with the Natural Environment Strategy?	Partial	<p>The site contains the following sites and habitats identified in the Natural Environment Strategy:</p> <ul style="list-style-type: none"> <li>- At Longis Bay, there are eelgrass beds (H-17-SS.SMp.SSgr.Zmar and SS.SMp.SSgr.Zmar/LS.LSa.FiSa.Po) which fall under the international tier of the hierarchy of environmental designations (see Map F.4). Information accompanying the submission identifies a voluntary eelgrass bed avoidance zone. In comparing this area to the spatial extent of eelgrass bed mapped in Map F.4, this zone does not appear to have sufficient coverage and an area of eelgrass bed would remain affected by the scheme.</li> <li>- Within the site at Longis Bay, there are a number of intertidal habitats which fall under the regional or local tier of the hierarchy of environmental designations (see Maps F.5 and F.6) including IR.HIR.KFaR.LhypR; LR.HLR.FR.Him; LR.HLR.MusB.Cht; LR.MLR.BF.Fser.R; LR.HLR.FR.Him; LR.MLR.BF.Rho; LR.LLR.F.Fserr.X; LR.FLR.Eph.EphX; LR.LLR.F.Fves.X; LR.FLR.Eph.Ent; LS.LSa.MoSa.BarSa; LS.LSa.St.Tal; LR.HLR.FR.Osm; and LS.LSa.MuSa.MacAre.</li> <li>- A proportion of the site at Longis Bay contains fixed coastal dunes with herbaceous vegetation which falls under the international tier of the hierarchy of environmental designations (see Map F.4).</li> <li>- A section of the route between Longis Bay and Mannez Road contains dune grassland which falls under the regional tier of the hierarchy of environmental designations (see Map F.5).</li> <li>- Within the site area at Corblets Bay, there are areas of acid grassland- semi-improved which falls under the international tier of the hierarchy of environmental designations (see Map F.4) and areas of coastal grassland which falls under the regional tier of the hierarchy of environmental designations (see Map F.5).</li> </ul> <p>A section of the route between Longis Bay and Mannez Road is sited adjacent to but not overlapping an area of standing water (eutrophic) which falls under the regional tier of the hierarchy of environmental designations (see Map F.5). Longis Nature Reserve, which is subject to submission PA/089, overlaps the majority of the site. Table C.1 of the Natural Environment Strategy identifies that subject to further assessment this site may be capable of designation as a site of local importance. The development would therefore require land within the nature reserve for its construction and operation.</p> <p>The information accompanying the Call for Sites submission does not distinguish between the land required for the permanent infrastructure or temporary land take required for construction; instead it provides an outer boundary within which all construction and permanent work would be located. The Call for Sites submission states that the final design of the interconnector will not be known until beyond the autumn 2017 when a contractor is appointed. Therefore, it is not currently known whether works are proposed on or adjacent to these habitats and therefore the potential for harm. Should this proposal be brought forward, a detailed assessment of the impacts on biodiversity would be required including any mitigation measures required to address potential environmental impacts relating to the identified sites and habitats during both the construction and operational phases, as well as any monitoring which may be required.</p> <p>The draft planning application for the proposed development (July 2016) was accompanied by the draft FAB Link Interconnector: Alderney Environmental Report (RPS on behalf of FAB Link Ltd, July 2016) focussing on the onshore elements of the project. The Report considers the impact the project may have on the natural state of the Island including but not limited to ecology and nature conservation, air quality and health, noise and vibration, hydrology and flood risk, ground conditions, contamination and land use. The Report concludes that any impacts relating to these areas could be successfully mitigated and resolved.</p> <p>It should be noted that the findings of the Environmental Report no longer relate to the proposal subject to the Call for Sites submission as amendments have since been made to the design in response to stakeholder feedback and further design development. The proposal subject to the Call for Sites submission is now materially different to that considered and assessed in the draft Environmental Report (July 2016) and therefore it is unknown whether it continues to reflect the potential impacts of the proposal.</p> <p>It is noted that a pre-application meeting took place on 24 October 2016 with representatives from FAB Link Ltd, RPS, Arup and the States of Alderney during which the draft planning application was discussed. Advice was provided to FAB Link Ltd during this process with regards to specific information requirements at application stage, including the level of detail required for the assessment of impacts on the natural environment. It is expected that FAB Link Ltd would respond in full to all points raised during this pre-application process as part of a future planning application.</p> <p>The Call for Sites submission states that the construction methodologies and site locations will be determined in detail by the appointed contractor in autumn 2017. Detailed information regarding the terrestrial and intertidal section of the scheme and potential environmental implications is therefore not currently available.</p> <p>The Natural Environment Strategy recommends that the current extent of the Agricultural Zone should be reviewed to ensure that it reflects current uses (Recommendation 29). Part of the site is currently designated as Agricultural Zone, however it is not in use (see Map F.8) and therefore is proposed for removal from the Agricultural Zone in the emerging Land Use Plan.</p> <p>The proposed scheme may support the generation of electricity from renewable energy sources, through providing a potential 'route to market' for the tidal energy project (considered under reference PA/087). On this basis, the proposal may contribute to the reduction in climate change</p>
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## Phase 2 Land Use Plan Review Call for Sites Assessment

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Site name: Route between Corblets Bay and Longis Bay (FAB Link)

Does the proposal accord with the Built Environment and Heritage Strategy?	Partial	<p>The site falls within the Longis Common and Longis Common Conservation Area (C/004) (which includes Longis Bay), which is the most archaeologically sensitive area of Alderney (p.35, Built Environment Heritage Strategy). This includes known areas of archaeological interest including at the Jetty Site at Longis Harbour (MGU4359), Peat at Longis (MGU4254), Findspot in Longis Bay (MGU4344), Rotary Querns at Longis Bay (MGU4340) (adjacent to site not within), La Pierre du Vilain on Longis Common (MGU5664) (adjacent to site not within) and Graves near La Pierre du Vilain (MGU5672) (adjacent to site not within). In addition, there is an archaeological area located adjacent to the site which contains Prehistoric Pottery from L'Etoc Quarry (MGU6768) which is located outside of the Longis Common Conservation Area (C/004). The Built Environment and Heritage Strategy recommends that this area be afforded protection through the Land Use Plan (Recommendation 37).</p> <p>The site overlaps the south eastern corner of Longis Common Cemetery (AS/005), which is also subject to consideration under submission reference PA/077. This site is recommended for inclusion on the Register of Historic Buildings and Ancient Monuments and will be provided interim policy protection through the Land Use Plan. The Proposed Alderney Cable Route plan (November 2016) accompanying the Call for Sites submission takes Longis Common Cemetery (AS/005) into account, through the provision of a 'war graves exclusion area'. The additional evidence accompanying submission PA/077, indicates that the area of the Longis Common cemetery may be larger than previously understood and therefore a future planning application would need to demonstrate that the proposed routing and associated mitigation measures have taken into account this new information.</p> <p>The Built Environment and Heritage Strategy identified a considerable number of World War II constructions, which, where warranted, the Strategy recommended be added to the Register of Historic Buildings and Ancient Monuments. World War II constructions located within the site comprise the Strongpoint Steinbruch (including the anti-tank wall) across Longis Bay (MH/037) and Lager Norderney and surrounding area (MH/045). These sites are recommended for inclusion on the Register of Historic Buildings and Ancient Monuments and will be provided interim policy protection through the Land Use Plan. Submission PA/109 also promotes the Strongpoint Steinbruch site's importance as a location of forced labour suffering and submission PA/111 seeks protection of the Lager Norderney and surrounding area in recognition of its history of housing forced labourers. The Built Environment and Heritage Strategy also recommends that further consideration should be given to the need for additional protection, policies and procedures that might be required for such areas, to ensure that these assets are afforded the same level of protection and reflect best practice from other jurisdictions (Recommendation 22).</p> <p>The site area is located adjacent to two registered heritage assets including Sharpes Farm (B/136) and Sharpes Farm Shed (B/137).</p> <p>The site falls within and contributes to Area of Landscape Value LV03 (From the road junction south of Chateau L'Etoc, south-east across Arch and Corblets Bay to the west front of Fort Corblets and north of the coastal road), Area of Landscape Value LV06 (Longis Common, south of Berry's Quarry, east of Workers' cemetery, and north of Longis Road) and Area of Landscape Value LV07 (South-west of Les Bouffresses, east of Longis Road down to the sea wall the German Wall of Longis Bay).</p> <p>The draft FAB Link Interconnector: Alderney Environmental Report (RPS on behalf of FAB Link Ltd, July 2016) considers archaeology and cultural heritage. The Report concludes that impacts on the Conservation Area at Longis Common would be short term and there would be no residual impacts based on the visual and noise impacts of the scheme. Further, the Report states that the proposed development would not impact on the fabric of any structures that have been designated as Historic Buildings. The Report states that there would be some changes within the settings of several historic buildings during construction, but these would be temporary and would not affect the significance of these buildings. With regards to archaeology, the Report states that the section of the proposed development within Longis Common is considered to have the highest potential for impact on buried archaeological remains. However, an archaeological watching brief would be maintained during those parts of the construction programme that require ground clearance and excavation.</p> <p>It should be noted that the findings of the Environmental Report no longer relate to the scheme subject to the Call for Sites submission as amendments have since been made to the design in response to stakeholder feedback and further design development. The scheme subject to the Call for Sites submission is now materially different to that considered and assessed in the draft Environmental Report (July 2016) and therefore it is unknown whether it continues to reflect the potential impacts of the scheme.</p> <p>It is noted that a pre-application meeting took place on 24 October 2016 with representatives from FAB Link Ltd, RPS, Arup and the States of Alderney during which the draft planning application was discussed. Advice was provided to FAB Link Ltd during this process with regards to specific information requirements at application stage, including the level of detail required for the assessment of impacts on the built heritage and archaeology. It is expected that FAB Link Ltd would respond in full to all points raised during this pre-application process as part of a future planning application.</p> <p>The Call for Sites submission states that the construction methodologies and site locations will be determined in detail by the appointed contractor in autumn 2017. As such, detailed information regarding the terrestrial and intertidal sections of the scheme and potential impacts on built heritage and archaeology is not currently available.</p>
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### Assessment of Suitability, Availability and Achievability

Is the site suitable for the proposed purpose?	Yes, with mitigation	<p>Both the suitability of the preferred landfall options and onshore route have been taken into account by the submitter in identifying the preferred location for the scheme.</p> <p>In terms of the rationale for the preferred landfall options of Corblets Bay and Longis Bay, the Desktop Study of France-Alderney Cable Route (Wood Group Kenny, February 2014) and Desktop Study of Alderney-Britain Cable Route (Wood Group Kenney, October 2014) shortlisted these locations based on techno-economic considerations. It should also be noted that the Wood Group Kenny study scope was to locate landfall options within States-owned land. The FAB France Alderney Britain Interconnector: Offshore Environmental Report (December 2016), which was submitted in support the FEPA licence application to the States of Guernsey, provided further assessment of different landfall options against social and environmental criteria and confirmed that on the basis of this assessment, Corblets Bay and Longis Bay were the preferred options. The States of Alderney submitted a representation to FAB Link Ltd's FEPA licence application, which raised concerns about the methodology followed for each of the identified criteria, the data used for undertaking this assessment and how the different environmental constraints and human environment criteria have been balanced in the single scores provided. Additional information was requested on these matters. No further information had been received at the time of writing.</p> <p>The Call for Sites submission states that the onshore cable route was chosen on the basis that the route across Longis Common is the shortest between Longis Bay and Corblets Bay. The submission confirms that the route will run through land within the States of Alderney ownership. It goes on to confirm that sustainability requirements determined that unfavourable engineering challenges or insurmountable environmental constraints must be present to justify any significant lengthening of the route. The Call for Sites submission states that FAB Link Ltd were able to locate a route of least impact across Longis Common which for the most part occupies an existing track and avoids valuable reed bed habitats. Given the resource constraints identified in the Natural Environment Strategy, it has not been possible to map the detailed locations of all habitats on the Island. This includes the reed beds referred to by FAB Link Ltd. Based on the information submitted as part of the Call for Sites process, specifically the drawing 'Proposed Alderney Cable Route', it has not been demonstrated that the proposed development area extent would avoid the reed bed habitats. A future planning application should demonstrate how reed bed habitats would be avoided and any impacts mitigated.</p> <p>The Call for Sites submission also states that the scheme is located to the east of the extrapolated maximum extent of the Longis Common cemetery (inclusive of an additional buffer zone). However, additional evidence accompanying submission PA/077, indicates that the area of the Longis Common may be larger than previously understood and therefore a future planning application would need to demonstrate that the proposed routing and associated mitigation measures have taken into account this new information.</p> <p>Given the concerns raised with regard to the assessment for identifying the preferred landfall locations and onshore cable route, it is not considered possible to determine at this stage whether the proposed location for the development is suitable. In addition, the assessment of the proposal against the Natural Environment Strategy and Built Environment and Heritage Strategy indicates the sensitivity of the site.</p> <p>There is currently insufficient detail to confirm that the proposal would not result in harm to the sensitive receptors described in the Natural Environment Strategy and Built Environment and Heritage Strategy. A future planning application would be required to demonstrate how potential harm could be managed, mitigated or if necessary compensated or off-set.</p>
Is the site available for the proposed purpose?	Yes, with mitigation	<p>The land is owned by the States of Alderney. The States of Alderney and FAB Link Ltd entered into a legally binding agreement in 2015 to facilitate the laying of the necessary cable works both on-shore and off-shore.</p> <p>Given the linear nature of the site, parts of the site are in different uses including areas for recreational activities (Longis Common, Corblets Beach and Longis Beach), a road and open land. The current uses would not require relocation as on completion of the proposed development of the underground interconnector cable, the land will be re-instated.</p>

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Is the site achievable for the proposed purpose?	Yes, with mitigation	<p>The draft FAB France Alderney Britain Interconnector: Alderney Cable Route Planning Supporting Statement (July 2016) states that in terms of access, <i>"the local area for the cable route is served by a number of roads suitable for local access"</i>. Further, <i>"traffic management measures have been considered and will be discussed in full liaison with Highways Officers accordingly"</i>. The draft Planning Statement also states that <i>"once operational, the development will not require servicing in terms of roads or utilities"</i>. On the basis that amendments have been made to the scheme since this assessment was undertaken in 2016, it is unknown whether appropriate water and road access and traffic management measures can be provided to the site.</p> <p>Currently the Building and Development Control Committee is unable to grant a planning application for this type of development because it is prohibited under Section 12 of the Building and Development Control (Alderney) Law, 2002. The Economic Development Strategy indicates that further consideration will be given to whether major energy projects should be permissible development in the Designated Area under Section 12 of the Building and Development Control (Alderney) Law, 2002. Amendments are proposed to Section 12 of the Law to enable the Building and Development Control Committee to permit developments of strategic importance.</p>
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Any other comments	
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### Conclusions

Does the proposal accord with the emerging Land Use Plan?	Yes, with mitigation	<p>Whilst the need for the scheme has been demonstrated, the justification for the proposed location for the development has not. It is therefore not possible to include a development specific zone for the proposal within the Land Use Plan. Any future planning application will therefore be assessed against the major projects policy (in accordance with Recommendation 79 of the Economic Development Strategy) and will need to demonstrate the rationale for the proposed location including the reasonable alternatives considered.</p> <p>Should the technical work conclude that the location contained within the submission represents the most appropriate location which is available, the future planning application would need to justify how the design positively responds to the surrounding built and natural environment and how during the construction and operation phases of the development, the impacts on the ecological receptors, archaeology and heritage assets and their settings would be mitigated. This includes for the development on land and located within the intertidal area (to the MLWL).</p>
Indicative development capacity (if applicable)		N/A