

Mr. Mike Dean
Chairman Building and Development Control Committee
States of Alderney
St. Anne
Alderney
GY9 3AA

22nd August 2019

Dear Mr. Dean,

Regarding planning application - PA/2019/084

This application has been drawn to our attention as it relates to land lying within an areas described under Policy HE4 of the 2018 Land Use Plan (LUP), previously described as protected under the 2002, 2007 and 2011 LUPs.

Having reviewed the approved LUP we feel we must raise the following concerns.

1. The area in which the application falls lies outside the 'Designated Area Agricultural Land Use Zone'.
2. The area of the intended development lies within an area described within Table C.2:
 - *Designated habitats and species of international, regional and local importance Designation type Designated habitat Location Presence International EC Habitats Directive Dry Atlantic coastal heaths - South Cliffs...*
 - *Protected under UK law (for example habitats linked to Sites of Special Scientific Interest (SSSI) - Sea cliffs and slopes Giffione Exact presence known (Figure 5.5)*

Further the area of the development lies within one of the best nesting areas for the Dartford warbler (*Sylvia undata*), which is currently listed as UK and European near threatened (or Amber List) species, along with many other native species including lesser whitethroat (*Sylvia curruca*) and European Stonechat (*Saxicola rubicola*).

3. Policy HE4 clearly sets out measures to which a development should be held and we would question if such a proposal can meet these, specifically:
 - a. '(A. i) Avoid harm to the landscape' – given the nature of the proposal and the impact of
 - i. Human presence in an area previously inaccessible and of great value to wildlife
 - ii. The bi-products of poultry keeping creating nitrification and having a potential direct impact in terms of run offWe are unable to see how this proposal can meet this measure.
 - b. '(A. ii) Protect or enhance the character of Alderney's Landscape' – given the LUPs description of the current value of the site for island biodiversity, this application which would be suited to areas designated for agricultural use, and which would directly impact the island's biodiversity as described under the Building Development Control (Alderney) Law, 2002 (amended), seems also to fail this measure.
 - c. '(B) Development proposals which may harm the landscape character of the island...' – it does not seem that this application can meet this 3 stage measure and given the nature of measure B.ii., and of the development, it does not seem possible for the proposal to promote the protection or enhancement of the natural beauty of the foreshores and cliffs of the island.
 - d. '(D) Development proposals on land adjacent to the foreshores and cliffs of the island will have regard to the special characteristics of these areas, and to the protection of their natural beauty. This will include consideration of the views of into and out of the island' – given the nature of the development and the undeveloped/built nature of the Giffione there are concerns that:
 - i. This development will set a precedent for buildings in an area where there are no other such structures. The nearest such building is hundreds of metres to the east and adjacent to a tarmacked road, within the LUP's Agricultural Zone.
 - ii. The structure will be highly visible from the sea and from the air as it lies on the main approach for both air and sea traffic.

I hope your Committee will be able to take these concerns into consideration.

Yours Sincerely

CEO Alderney Wildlife Trust

