Mrs. Donna Francis President La Société Guernesiaise Candie Gardens St Peter Port Guernsey Channel Islands GY1 1UG



21st April, 2020

Dear Mrs. Francis

In response to the Longue Hougue South proposal Environmental Impact Assessment.

The Alderney Wildlife Trust supports the Société's response to the Longue Hougue South Inert land fill proposal. Specifically, its review of the environmental assessment (undertaken by Royal Haskonings) as laid out in their report authored by Dr. Broadhurst-Allen.

The extent and health of the Bailiwicks Zostera (common eelgrass) marina beds is poorly described, with beds as healthy as that found at Longue Hougue believed to be relatively rare. The importance of eelgrass as a vital marine habitat, its role as a nursery ground for important commercial fish species and its value as a carbon sink, are now all being extensively studied. What is already clear is that the potential value of the Bailiwick's eelgrass beds is only set to increase as an important resource for all of our islands.

The environmental impact assessment for the proposed development focuses only on the Longue Hougue site which, as already stated, is a site of significant ecological importance. No detailed evaluation was undertaken for any of the alternative sites proposed. Further the environmental assessment explores only a single form of mitigation and does not adequately consider the knock on impacts of this mitigation, failing to adequately deal with the impacts of the development itself on the proposed relocation site, nor the use of alternative species to rebuild destroyed habitats. These failings dramatically weaken the value of this assessment, and we would hope members will take this into consideration.

Given the States of Guernsey leading role in the establishment of the Blue Island's Charter, with its focus on sustainability and protection of the marine environment, it seems vitally important that any new proposals for the management of the Guernsey estate take are based on these principals. The AWT would respectfully ask Guernsey States members to please consider alternative methods of dealing with the islands inert waste are fully explored, including the recycling and reclamation of inert waste for re-use. In doing this the States of Guernsey can help in setting a precedent for the Bailiwick, demonstrating how appropriate and properly undertaken impact assessment can play a key role in ensuring a sustainable future for the Bailiwick as a whole, something of immense importance in these trying times.

Yours sincerely,

B. Hell MRE

Brian Heath MBE Chairman

Roland Gauvain

CEO