



Dear States Members,

The National Trust for Jersey is aware that States members face a difficult challenge in agreeing the strategic direction of our forthcoming Bridging Island Plan and in particular striking the right balance between the urgent need for affordable housing whilst protecting Jersey's natural beauty, environment and sense of place.

However, when considering the plethora of tabled amendments, the Trust sincerely hopes that each States member will carefully consider their personal obligation to ensure that the Bridging Island Plan is fully compliant with the Planning Law 2002. This law not only states that any plan must deliver sustainable development but equally the means to "protect, enhance, conserve and to use wisely the natural beauties, natural resources and biodiversity" of our Island. In addition it is the intention of the law to ensure that "the coast of the Island is kept in its natural state".

In light of these legal requirements, the Trust would strongly urge States members to reject the Environment Minister's amendment for continued extraction at Simon Sand Quarry given that the proposal will permanently destroy an area of coastal duneland and create an enlarged body of polluted water, which may never be restored due to the continuing presence of PFOS. The Minister has suggested that local extraction delivers sustainability, a low carbon footprint and cheaper sand. The Trust would like to specifically address these issues as follows:

**(i) Sustainability** - Continued extraction is not sustainable as it solely delivers profit at the expense of people and planet by creating a legacy of pollution for future generations to address

**(ii) Carbon Footprint** - Whilst local sand extraction may have a lower carbon footprint than importation this needs to be judged in the context of Jersey currently importing over 90% of its building construction materials. If the Minister is truly serious about reducing the carbon footprint of the construction industry he needs to review the whole supply chain in a holistic manner as otherwise this is a token gesture amounting to "greenwash".

**(iii) Cost Implications** - Most importantly the Trust is of the view that the Minister is not required under the Planning Law to deliver an Island Plan which provides a supply of cheaper building materials. Instead he is legally obliged to produce a plan which conserves and protects Jersey's natural resources. This could equally be applied to the safeguarding of the proposed mineral site at Gigoulande Quarry. It is also worth noting that the Trust estimates that the overall contribution of sand to the purchase price of a 4 bed house is somewhat inconsequential at just over 0.25%

**(iv) Landscape Implications** - the Minister has supported the Inspector's contention that the area in question is of little landscape value and is covered in bramble and contains significant overburden. The value of this area has been diminished due to the Minister and his predecessors failing to enforce the outstanding planning conditions for a restoration and aftercare strategy for the quarry. It is indeed ironic that the Minister is now utilising his own Department's failures over a 7 year period to justify further extraction. For Jersey to remain the only jurisdiction extracting duneland sand in Europe whilst other countries spend millions of pounds restoring this increasingly rare habitat completely undermines the Council of Ministers Common Strategic Policy to protect and value our environment.

On a more positive note the Trust also hopes that States members will fully support the extension to the National Park and the creation of a network of Marine Protected Areas equivalent to 30% of our territorial waters. Both of these policies clearly fulfil the purpose of the law to protect and *improve* the Island's natural beauty, environment and resources. When considering this positive obligation States members will need to deliberate as to whether those who seek to derail these improvement proposals are representing the majority of Islanders or indeed a minority with singular interests.

Finally the Trust is deeply concerned that a number of States members have sought to submit housing sites within the last round of amendments thus largely ignoring the Inspectors' findings and the public consultation process. If public consultation is to have any value in Jersey it needs to be respected and valued by the very Assembly that it seeks to inform and guide. The Trust would also urge States members to formally acknowledge that rezoning green fields is merely a sticking plaster whilst the Assembly fails to deliver a robust and actionable population policy for the benefit of our Island. In this respect it could be argued that the Bridging Island Plan is not compliant with the law on many levels including the bedrock of sustainability but it is to be hoped that States members will try to ensure that their decisions actively redress this imbalance by wholeheartedly supporting those important strategic opportunities which conserve, protect and improve the Island's natural beauty, character, biodiversity and coast.

Yours sincerely

**Charles Alluto**

For and on behalf of The Council of The National Trust for Jersey