

20th April 2010

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Environment Department
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Dear Dan

Thank you for inviting the National Trust for Jersey to comment on the draft Rural Economy Strategy 2011- 2015. Having now had the opportunity to review the document the Trust would like to make the following observations:

Growth of the Rural Economy PR3

Although the Trust recognises the benefits of removing barriers in order to increase productivity it is also important to ensure that such measures do not undermine the quality, USP and marketability of the product in the longer term.

Reducing the Environmental Costs of Agriculture PR4

The Trust very much welcomes the link between subsidy and improved environmental standards. In this respect it is essential that Policy PR7 is fully implemented at the earliest opportunity. The Trust would also suggest that environmental enforcement needs to be as robust as the new criteria being mooted.

Land Classification PR5

The Trust very much welcomes and endorses the development and introduction of a land classification system which identifies the most productive agricultural, environmental and amenity areas.

Access to the Countryside PR6

The Trust welcomes the principle of improving access to the countryside subject to this not having a detrimental impact upon landscape, ecology or biodiversity.

Review of Direct Support PR8

The Trust welcomes the proposed review of the Single Area Payment and believes that such funds should be regularly reviewed and targeted to where they are most needed for economic and environmental benefit, as well as encouraging diversity and enterprise. For example does the existing Single Area Payment benefit the potato industry at the current time or simply inflate the land rental market?

Local Markets and Food Self Sufficiency PR12

The Trust fully supports and endorses the concept of greater self-sufficiency and food security. Obviously this will be largely dependant upon successful implementation of Policy E12b in relation to safeguarding the agricultural land bank, as well as consideration of current immigration policy.

Countryside Renewal Scheme PR15

The Trust would request confirmation as to the level of funding that will be maintained by the States for the Countryside Renewal Scheme, together with clarification as to future components and environmental/ecological priorities for the scheme. It is also essential that an adequate monitoring system is put in place in order to demonstrate the value of the scheme through environmental enhancement and benefit.

Capture Fisheries PR18

The Trust would urge the States to adopt a proactive marine policy which is sustainable and seeks to protect the resource and the marine environment, including the possibility of no take zones. At first sight Policy Option PR 18b appears to be rather non-committal and lacking in substance given the problems identified in the Issue Section.

Export of Fish Products PR20 and The Future of Processing PR24

The Trust very much welcomes the principle of processing to avoid waste and enhance value. Sites for such facilities may become apparent once Policy E15 is implemented.

Community Agriculture PE2, PE3 and PE8

The Trust fully supports the concept of community agriculture, countryside classrooms, rural skills training including best environmental practice such as branchage, and agri-tourism. Indeed Hamptonne maybe a perfect location for developing and implementing

some of these strategic objectives and the Trust would urge the department to work with ESC to discuss the potential viability of such a plan.

Climate Change PE 5B

The Trust would also like to highlight that wetlands are an important form of carbon storage, crucial to water quality and can help mitigate against flooding during high rainfall events. It is therefore essential that Jersey's remaining wetlands are protected and enhanced as opposed to being incrementally eroded through inappropriate development and land usage.

Environment Plan E2

The Trust would suggest that in addition to farmers and landowners, the Island's Government is also very much a custodian of our remaining countryside.

Wildlife Corridors E3

The Trust very much welcomes and endorses this policy.

Understanding Wildlife in the Countryside E4

The Trust welcomes the proposed monitoring and believes this is crucial to demonstrating the value and benefit of the Countryside Renewal Scheme both to Government and the wider general public. Please see PR15.

Safeguarding the agricultural land bank E12

The Trust fully supports the concept of safeguarding the agricultural land bank.

Enabling or Linked Development E14

The Trust is unable to support this policy given the potential implications for the rural environment. It is also difficult to understand how this policy is compatible with the ethos of the agricultural industry being custodians of the countryside.

The Trust believes that over the years the agricultural industry has benefited from several planning concessions and it remains unclear as to whether this has truly helped to secure the long term future of the industry and by default protect Jersey's countryside ie the rural asset. The Trust would therefore suggest that a review should be undertaken to assess what has been achieved to date before any further concessions are granted.

In conclusion the National Trust welcomes the strategic approach to the rural economy but notes that this report focuses exclusively on the agricultural and fisheries industry. The rural economy is a far more complex entity and it maybe more appropriate for this

report to be entitled Agricultural/Fisheries Strategy to avoid any confusion in this respect. The Trust would also welcome further clarification and focus on the following:

- (a) The overall cost of implementing the Strategy and how this will be covered
- (b) Specific targets and time scales for implementation of the strategy
- (c) Farm shops and retail activity within agricultural businesses
- (d) The historic environment
- (e) Small holders
- (f) Level of grant funding available from RIS, CRS and JEG
- (g) A detailed summary of the agricultural/fisheries industry as at 2010 so that we have an accurate baseline upon which we can judge the success or otherwise of the strategic plan

We do hope that our comments are of value and obviously we would be delighted to discuss any of them in more detail should you feel this would be appropriate.

With kind regards

Yours sincerely

Charles Alluto
Chief Executive of The National Trust for Jersey