

**8<sup>th</sup> April 2022**

**Draft Planning and Building (Amendment No. 8) (Jersey) Law 202- [P.76/2021] Scrutiny Review**

**Royal Jersey Agricultural and Horticultural Society**

Submission to Scrutiny and the Government of Jersey Consultation: *“Consultation questions - better protection for Jersey's trees”*

1. We have some comments regarding the Arup report on *“Species and habitat Protection Project – Review of tree protection legislation”*, dated 4<sup>th</sup> December 2021.
  - a. The recommendation that Jersey introduces a ‘blanket level of protection for all trees’ is only shared by two of the jurisdictions examined (Isle of Man & Alderney).
  - b. Blanket protection is deemed unnecessary in England, Scotland, Guernsey, France, Germany & Poland.
  - c. There is no justification given for this recommendation and no supporting evidence provided.
2. Without publication of proposed regulations and exemptions it is impossible to make informed comment of likely effect, however, it is likely to add bureaucracy, delay and cost to the management of trees.
3. It is highly possible that, as a result, the proposal will have unintended consequences. For example, acting as a disincentive to landowners to further plant trees, a wholly undesirable outcome.
4. The requirement of only States of Jersey approved contractors being able to undertake works will also add cost.