



**CHRISTMAS MEETING of CHIEF PLEAS to be held on  
WEDNESDAY 21st JANUARY 2026 at 5.00pm in the ASSEMBLY ROOM**

**AGENDA**

1. MATTERS ARISING from the Budget meeting of Chief Pleas held on 19th November 2025.
2. QUESTIONS Not Related to the Business of the Day.
3. To CONSIDER a Report with Ordinance, Proposition and Timetable from the POLICY & FINANCE COMMITTEE entitled **"By-Election"**.
4. To CONSIDER a Report with Ordinance, Propositions and Timetable from the POLICY & FINANCE COMMITTEE entitled **"Deputy Speaker Election"**.
5. To CONSIDER a Report with Ordinance and Proposition from the MEDICAL and EMERGENCY SERVICES COMMITTEE entitled **"The Medicines (Human and Veterinary) Law (Amendment) Ordinance, 2025"**.
6. To CONSIDER a Report with Projet de Loi and Proposition from the POLICY and FINANCE COMMITTEE entitled **"The Direct Taxes (Sark) (Amendment) Law, 2026"**. **[\*\*LATE PAPER\*\*]**
7. To CONSIDER a Report with Ordinance and Proposition from the TOURISM (INCL. PUBLIC HEALTH) COMMITTEE entitled **"The Tourism (Accommodation Permits) (Fees) (Sark) (Amendment) Ordinance, 2026"**.
8. To CONSIDER a Report with Propositions from CONSEILLER FRANK MAKEPEACE and CONSEILLER NICK MOLONEY entitled **"Motion to require immediate compliance with the January 2019 resolution establishing a Scrutiny Committee"**.
9. To CONSIDER a Report with Propositions from the POLICY & FINANCE COMMITTEE entitled **"Revised Mandate for the Scrutiny Management Committee"**.
10. To CONSIDER a Report with Proposition from the POLICY & FINANCE COMMITTEE entitled **"Loan Facility Agreement"**. **[\*\*LATE PAPER\*\*]**
11. To CONSIDER a Report with Propositions from the POLICY & FINANCE COMMITTEE entitled **"Code of Conduct and Declaration of Interests for Members of Chief Pleas"**.
12. To CONSIDER an Information Report from the AGRICULTURE, ENVIRONMENT & SEA FISHERIES COMMITTEE entitled **"Annual Information Report"**.
13. To CONSIDER a Report with Propositions from the AGRICULTURE, ENVIRONMENT & SEA FISHERIES COMMITTEE entitled **"Sea Fisheries Report"**. **[\*\*LATE PAPER\*\*]**



14. To CONSIDER a Report with Proposition from the AGRICULTURE, ENVIRONMENT & SEA FISHERIES COMMITTEE entitled “**Marine Protected Area**”.
15. To CONSIDER a Report with Propositions from the Douzaine entitled “**Amendments to The Motor Vehicles (Sark) Regulations, 2014**”.
16. To CONSIDER a Report with Propositions from the DOUZAINÉ entitled “**Amendments to the Road Traffic Offences (Motor Vehicles and Bicycles) (Sark) Regulations, 2014**”.
17. To CONSIDER an Information Report from the DOUZAINÉ entitled “**Open Burning of Rubbish**”.
18. To CONSIDER a Report with Proposition from the DOUZAINÉ entitled “**Change to Mandate**”.
19. To CONSIDER a Report with Propositions from the POLICY & FINANCE COMMITTEE entitled “**Appointment of the Tax Assessor and the Deputy Tax Assessor**”.
20. To CONSIDER an Information Report from the TOURISM (INCL. PUBLIC HEALTH) COMMITTEE entitled “**Annual Report**”.
21. To CONSIDER an Information Report from the DEVELOPMENT CONTROL COMMITTEE entitled “**Annual Report**”.
22. COMMITTEE ELECTIONS: To elect Conseillers to Committees, as required.
23. COMMITTEE and PANEL ELECTIONS: To elect Non-Chief Pleas Members and Panel Members to Committees and Panels, as required.
24. Under the Provisions of Rule 13 of the Rules of Procedure of the Chief Pleas of Sark, the Speaker of Chief Pleas has received the following item to be added to the agenda:

#### **LAI D BEFORE**

- The Motor Vehicles (Amendment) (Sark) Regulations, 2025
  - Commissioner for Standards - Statement for Sark

*P M Armorgie*  
*Speaker of Chief Pleas*

22nd December 2025

*NOTES: Anyone wishing to see any of the Reports and Supporting Papers may do so at the Committee Office, Monday to Thursday, 9am to 2pm, and Friday, 9am to 12 noon, excluding public holidays; copies may be obtained from the Committee*



Office. The Agenda, Reports and Supporting Papers may also be seen on the Chief Pleas' website at: <https://sarkgov.co.uk/chief-pleas>.

**POLICY & FINANCE COMMITTEE**

**Report with Proposition to Christmas Chief Pleas, 21st January 2026**

**BY-ELECTION**

This report covers the requirement for a By-Election to replace Conseillers who have resigned from Chief Pleas.

Section 23A(1) of The Reform Law provides that *‘[...] upon the occurrence of a casual vacancy amongst Conseillers, a by-election shall be held on such date, not later than six months after the occurrence of the vacancy, as the Chief Pleas shall by Ordinance appoint.’*

One vacancy is now required to be filled following the resignation of Ben Harris last year. Following discussions with the Returning Officer as to a suitable date, the Policy & Finance Committee comes to this meeting with an Ordinance already prepared and which is attached to this report.

25th February 2026 has been selected as the date of the By-Election. The Returning Officer’s timetable is attached to this report.

**Proposition 1 -**

**That Chief Pleas approves the draft ordinance entitled “The Reform (Election of Conseillers) (By-Election) (Sark) Ordinance , 2026”.**

**Conseiller John Guille**  
**Chairman, Policy & Finance Committee**



## TIMETABLE FOR BY-ELECTION OF CONSEILLERS - 25th FEBRUARY 2026

**Thu 22 Jan 26** Notice in Sark Gazette Officielle and St. Peter's Church Notice Box of forthcoming election. Notice gives date and time when final nominations are to be received etc.

Nomination forms will be available online or for collection from the Speaker's office, prior to nominations opening, during the following hours: Tuesday, Wednesday and Friday between 1.30pm and 3.30pm.

When completed, but not before 10am on Monday 09 February, the forms are to be delivered by one of the persons named on the form to the Speaker of Chief Pleas (Returning Officer). Completed forms can be returned between Monday 09 February and Thursday 12 February 2026 between 10am and 12noon and 1pm and 3pm. On Friday 13 February forms can be returned between 10am and 12noon.

**Fri 06 Feb 26** Electoral Register closes and remains closed until the By-Election process is complete.

**Mon 09 Feb 26** Nominations open at 10am.

A daily list of nominations received will be posted in Sark Gazette Officielle and St Peter's Church Notice Box; nominations will be listed in the order received.

**Fri 13 Feb 26** Nominations to close at 12 noon. [Thereafter the Returning Officer will post Official Notices asking for volunteers from Island Residents to man the Polling Station and to conduct the Count after the poll closes; application for these functions to close at 3pm on Friday 20 February 2026]

**Fri 13 Feb 26** Notice in Sark Gazette Officielle and St Peter's Church Notice Box of Candidates with Proposers and Seconders.

Notice sent to the printers with the List of Candidates for the printing of Voting Papers.

**Wed 25 Feb 26** **By-Election** polling from 10am until 6pm - Polling Station in Toplis Room, Island Hall - Count in Main Hall Room. (The Count is to begin as soon after polls close as possible.)

**Thur 26 Feb 26** Notice in Sark Gazette Officielle and St. Peter's Church Notice Box of Result.

In the event of a 'tie' between two candidates, when the addition of one more vote would have caused a person to be elected, a further By-Election is to be held. (New Voting Papers are to be produced for the tied candidates and Notices of the further election are to be published in Sark Gazette Officielle and St. Peter's Church Notice Box, as for Wednesday 25 February)

**Wed 11 Mar 26** Further By-Election re-run, only for candidates tied on 25 February 2026. (No other nominations allowed.)

**Thur 12 Mar 26** Notice in Sark Gazette Officielle and St. Peter's Church Notice Box of Further Election Result.

**P M Armorgie**  
**Returning Officer**

**21st January 2026**

# **The Reform (Election of Conseillers) (By-Election)**

## **(Sark) Ordinance, 2026**

**THE CHIEF PLEAS OF SARK**, in exercise of the powers conferred on them by sections 23A, 25(5) and 29(6) of the Reform (Sark) Law, 2008<sup>a</sup>, and all other powers enabling them in that behalf, hereby order:-

### **Date fixed for by-election.**

1. (1) A by-election for the purpose of filling such number of casual vacancies in the office of Conseiller -

(a) existing as at the date when this Ordinance is made,  
and

(b) occurring, for any reason, on or before Friday 6<sup>th</sup>  
February, 2026,

shall be held on Wednesday 25<sup>th</sup> February, 2026.

(2) In the event of two or more candidates at the said election securing an equal number of votes, and by reason thereof a further election being required to be held in pursuance of the provisions of section 25(5) of the Reform (Sark) Law, 2008, in respect of such candidates only, without further nomination, such further election shall be held on Wednesday 11<sup>th</sup> March, 2026.

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<sup>a</sup> Order in Council No. V of 2008; this enactment has been amended.

**Date of closure of register.**

2. The Register of Electors shall close, pursuant to section 29(6) of the Reform (Sark) Law, 2008, on Friday 6<sup>th</sup> February, 2026.

**Citation.**

3. This Ordinance may be cited as the Reform (Election of Conseillers) (By-Election) (Sark) Ordinance, 2026.

**POLICY & FINANCE COMMITTEE**

**Report with Propositions to Christmas Chief Pleas, 21st January 2026**

**DEPUTY SPEAKER ELECTION**

With Jeremy La Trobe-Bateman's term of office as Deputy Speaker expiring on 24th May 2026, it is necessary to elect a new Deputy Speaker. In accordance with *The Reform (Sark) Law 2008*, the election of a new Deputy Speaker will take place at an Extraordinary Meeting of Chief Pleas with Wednesday, 8th April 2026 as the proposed date. The timetable for the election of a Deputy Speaker as agreed by the Greffier as the Returning Officer is attached.

It is proposed that the Term of Office for the Deputy Speaker will be three years commencing on 25th May 2026 and ending on 24th May 2029.

The Policy & Finance Committee, on behalf of Chief Pleas, would like to place on record its appreciation for Jeremy La Trobe-Bateman's service.

**Proposition 1 -**

**That Chief Pleas approve the draft Ordinance entitled “The Reform (Election of Deputy Speaker) (Sark) Ordinance, 2026”.**

**Proposition 2 -**

**That Chief Pleas approve the term of office for the Deputy Speaker to be three years, commencing on 25th May 2026.**

**Conseiller John Guille  
Chairman, Policy & Finance Committee**

## **TIMETABLE FOR DEPUTY SPEAKER ELECTION - 8th APRIL 2026**

Fri 06 Mar 26	<p>Notice in the Gazette Officielle and St Peters Church notice board box of the forthcoming election. Notice gives place, date, and time when final nominations are to be received, etc.</p> <p>Nomination forms will be available online or for collection from the Greffe office, prior to nominations opening, during the following hours: Tuesday, Wednesday and Friday between 2.30pm and 4.00pm.</p>
Tue 13 Mar 26	<p>Nominations open at 2.30pm. Greffe office open for receipt of nominations on Tuesday, Wednesday, and Friday from 2.30pm to 4pm.</p>
Fri 20 Mar 26	<p>Nominations close at 4pm.</p>
Fri 27 Mar 26	<p>Notice in the Gazette Officielle and St Peters Church notice board box listing the nominations.</p>
<b>Wed 08 Apr 26</b>	<p><b>Extraordinary meeting of Chief Pleas convened for this purpose alone.</b></p> <p>In the event of a 'tie' between two or more candidates, when the addition of one more vote would have caused a person to be elected, a further Election will be held at the same meeting.</p>
Thu 09 Apr 26	<p>Notice in the Gazette Officielle and St Peters Church notice board box confirming the result.</p>

**T Hamon**  
**Greffier**  
**21st January 2026**

# **The Reform (Election of Deputy Speaker)**

## **(Sark) Ordinance, 2026**

**THE CHIEF PLEAS OF SARK**, in pursuance of their Resolution of the 21<sup>st</sup> January, 2026, and in exercise of the powers conferred upon them by sections 22A(5) and 22B(2) of the Reform (Sark) Law, 2008<sup>a</sup>, and all other powers enabling them in that behalf, hereby order:-

### **Date of election of Deputy Speaker.**

1. (1) The date appointed for the Deputy Speaker election is 8<sup>th</sup> April, 2026.

(2) In subsection (1), "**the Deputy Speaker election**" means an election for the office of Deputy Speaker of the Chief Pleas for a term of office commencing on 25<sup>th</sup> May, 2026.

### **Citation.**

2. This Ordinance may be cited as the Reform (Election of Deputy Speaker) (Sark) Ordinance, 2026.

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<sup>a</sup> Order in Council No. V of 2008. This enactment has been amended.

**MEDICAL & EMERGENCY SERVICES COMMITTEE**

**Report with Proposition to Christmas Chief Pleas, 21st January 2026**

**The Medicines (Human and Veterinary) (Bailiwick of Guernsey) Law (Amendment) Ordinance, 2025**

The Medicines (Human and Veterinary) (Bailiwick of Guernsey) Law (Amendment) Ordinance, 2025 was approved by the States of Guernsey on 17th December 2025. This Ordinance amends section 35 of The Medicines (Human and Veterinary) (Bailiwick of Guernsey) Law, 2008 to authorise Guernsey's Committee for Health and Social Care to make regulations concerning prescription-only medicines (POMs). It authorises the Committee for Health and Social Care to make regulations to describe medicinal products that are to be treated as POMs, and specify the types of health professionals who may prescribe or direct the use or administration of POMs, or administer these POMs, and the conditions under which they may do so. These powers will be given to the Committee for Health and Social Care in place of the power of the States of Deliberation in Guernsey to make Ordinances. In addition, this Ordinance replaces a reference in section 35(2)(c) of the Law to registers of ophthalmic opticians kept under the Opticians Act 1989, with a reference to the register of optometrists kept under that Act, which replaced the previous registers under an amendment made to that Act after the Law was enacted. This Ordinance also consequentially amends sections 35A, 36, 37, 44 and 132 of the Law, and saves and continues the Prescription Only Medicines (Human) (Bailiwick of Guernsey) Ordinance, 2009. Finally, the Committee for Health and Social Care will be authorised to make regulations to amend or repeal the provisions of that Ordinance.

Sark and Alderney were asked to consider whether they also wanted to approve the legislation. As Sark is already covered by The Medicines (Human and Veterinary) (Bailiwick of Guernsey) Law, 2008 the Medical & Emergency Services Committee is minded to support the Amendment Ordinance and asks Chief Pleas to approve the proposition.

**Proposition 1 -**

**That Chief Pleas approves the draft Ordinance entitled "The Medicines (Human and Veterinary) Law (Amendment) Ordinance, 2025".**

**Conseiller Helen Plummer  
Chair, Medical & Emergency Services Committee**

# **The Medicines (Human and Veterinary) (Bailiwick of Guernsey) Law (Amendment) Ordinance, 2025**

## **ARRANGEMENT OF SECTIONS**

1. Amendment of the Law of 2008.
2. Amendment of section 35 of the Law.
3. Amendment of section 35A of the Law.
4. Amendment of section 36 of the Law.
5. Amendment of section 37 of the Law.
6. Amendment of section 44 of the Law.
7. Amendment of section 132 of the Law.
8. Saving of the Prescription Only Medicines (Human) (Bailiwick of Guernsey) Ordinance, 2009.
9. Extent.
10. Citation.
11. Commencement.



# **The Medicines (Human and Veterinary) (Bailiwick of Guernsey) Law (Amendment) Ordinance, 2025**

**THE STATES**, in pursuance of their Resolution of the 21<sup>st</sup> March, 2025<sup>a</sup>, and in exercise of the powers conferred on them by section 131 of the Medicines (Human and Veterinary) (Bailiwick of Guernsey) Law, 2008<sup>b</sup>, and all other powers enabling them in that behalf, hereby order:-

## **Amendment of the Law of 2008.**

1. The Medicines (Human and Veterinary) (Bailiwick of Guernsey) Law, 2008 ("**the Law**") is amended as set out in sections 2 to 7.

## **Amendment of section 35 of the Law.**

2. (1) Section 35 of the Law is amended as follows.
- (2) In subsection (1) of that section -
- (a) for "States may by Ordinance", substitute "Committee for Health & Social Care may by regulations", and
- (b) for "the Ordinance" in each place where the expression occurs, substitute "the regulations".
- (3) In subsection (2) of that section -

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<sup>a</sup> Article V of Billet d'État No. VII of 2025.

<sup>b</sup> Order in Council No. V of 2009; this enactment has been amended.

- (a) for "an Ordinance", substitute "regulations",
  - (b) in paragraph (c), for "either of the registers of ophthalmic opticians", substitute "the register of optometrists", and
  - (c) in paragraph (e), for "the States" in the first and second places where the expression occurs, substitute "the Committee for Health & Social Care" and "that Committee" respectively.
- (4) In subsection (3) of that section -
  - (a) for "an Ordinance", substitute "regulations",
  - (b) for "includes", substitute "include", and
  - (c) for "the Ordinance", substitute "the regulations".
- (5) In subsection (4)(a) of that section, for "an Ordinance", substitute "regulations".
- (6) In subsection (6) of that section -
  - (a) for "any Ordinance", substitute "regulations", and
  - (b) in paragraphs (a) and (b), for "Ordinance" in each place where the expression occurs, substitute "regulations".
- (7) In subsection (7) of that section -
  - (a) for "An Ordinance", substitute "Regulations", and

- (b) for "the Ordinance" in each place where the expression occurs, substitute "the regulations".
- (8) In subsection (8) of that section -
  - (a) for "An Ordinance", substitute "Regulations", and
  - (b) for "the Ordinance", substitute "the regulations".
- (9) In subsection (9) of that section, for "Ordinance", substitute "regulations".
- (10) In subsection (10) of that section -
  - (a) for "an Ordinance", substitute "regulations", and
  - (b) for "the Ordinance", substitute "the regulations".

**Amendment of section 35A of the Law.**

- 3. In section 35A(5)(a) of the Law, for "an Ordinance", substitute "regulations".

**Amendment of section 36 of the Law.**

- 4. In section 36(1) of the Law, for "advising the States in relation to their exercise of powers", substitute "making regulations".

**Amendment of section 37 of the Law.**

- 5. (1) Section 37 of the Law is amended as follows.
  - (2) In subsection (1) of that section -

- (a) in the part preceding paragraph (a)-
    - (i) for "an Ordinance", substitute "regulations",
    - (ii) for "is made", substitute "are made", and
    - (ii) for "the Ordinance", substitute "the regulations",  
and
  - (b) in paragraph (b), for "the Ordinance comes", substitute "the regulations come".
- (3) In subsection (2) of that section-
- (a) in the part preceding paragraph (a), for "an Ordinance is", substitute "regulations are",
  - (b) in paragraphs (a) and (b), for "the Ordinance" in each place where the expression occurs, substitute "the regulations", and
  - (c) in paragraph (b), for "that Ordinance", substitute "those regulations".
- (4) In subsection (3) of that section-
- (a) for "an Ordinance", substitute "regulations", and
  - (b) for "the Ordinance comes", substitute "the regulations come".

**Amendment of section 44 of the Law.**

6. In section 44(2) of the Law, for "an Ordinance", substitute "regulations".

**Amendment of section 132 of the Law.**

7. (1) Section 132 of the Law is amended as follows.

(2) In subsection (3), for "a Department", substitute "the Committee for Health & Social Care".

(3) Immediately after subsection (3), insert the following subsections-

"(4) Regulations and orders made under this Law must be laid before a meeting of the States as soon as possible.

(5) Where regulations are laid before a meeting of the States, the States may resolve to annul those regulations at that meeting or the next meeting, but without prejudice to anything done under them or to the making of new regulations."

**Saving of the Prescription Only Medicines (Human) (Bailiwick of Guernsey) Ordinance, 2009.**

8. (1) Despite the amendments to the Law made by this Ordinance, the Prescription Only Medicines (Human) (Bailiwick of Guernsey) Ordinance, 2009<sup>c</sup> continues to have effect as if made by regulations under sections 35 and 132 of the Law.

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<sup>c</sup> Ordinance No. XXV of 2009; this enactment has been amended.

(2) The Committee for Health & Social Care may by regulations amend or repeal all or any part of that Ordinance.

**Extent.**

9. This Ordinance shall have effect throughout the Bailiwick of Guernsey.

**Citation.**

10. This Ordinance may be cited as the Medicines (Human and Veterinary) (Bailiwick of Guernsey) Law (Amendment) Ordinance, 2025.

**Commencement.**

11. This Ordinance shall come into force on the day appointed by Order of the Committee; and different dates may be appointed for different provisions and for different purposes.

## **ITEM 07**

### **TOURISM (INCL. PUBLIC HEALTH) COMMITTEE**

**Report with Proposition to Christmas Chief Pleas, 21st January 2026**

### **THE TOURISM (ACCOMODATION PERMITS) (FEES) (SARK) ORDINANCE, 2026**

At the Budget meeting of Chief Pleas on the 19th November 2025, Item 9, the Tourism Committee brought a report proposing an increase to the prescribed fee accompanying the application for an accommodation permit.

An increase in the fees is permitted under the Tourism (Sark) Law, 1982 by means of an Ordinance, which the Committee now presents to Chief Pleas.

The Ordinance accompanying this report sets out the new fees to amend The Tourism (Accommodation Permits) (Fees) (Sark) Ordinance, 2021.

#### **Proposition 1 -**

**That Chief Pleas approves the draft Ordinance entitled 'The Tourism (Accommodation Permits) (Fees) (Sark) Ordinance, 2026'.**

**Conseiller Natalie Tighe**

**Chairman, Tourism (incl. Public Health) Committee**

# **The Tourism (Accommodation Permits) (Fees) (Sark) (Amendment) Ordinance, 2026**

**THE CHIEF PLEAS OF SARK**, in pursuance of their Resolution of the 21<sup>st</sup> January, 2026, and in exercise of the powers conferred on them by sections 7 and 20 of the Tourism (Sark) Law, 1982<sup>a</sup>, and all other powers enabling them in that behalf, hereby order:-

## **Amendment of 2021 Ordinance.**

1. For the table in the Schedule to the Tourism (Accommodation Permits) (Fees) (Sark) Ordinance, 2021<sup>b</sup> substitute the following table -

"

<b>Category of accommodation</b>	<b>Fee per person</b>
Hotel	£12.50
Guest House	£11.25
Self-catering	£10.00
Camp sites	£6.25

"

## **Citation.**

2. This Ordinance may be cited as the Tourism (Accommodation Permits) (Fees) (Sark) (Amendment) Ordinance, 2026.

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<sup>a</sup> Ordres en Conseil Vol. XXVII, p. 576; this enactment has been amended.

<sup>b</sup> Sark Ordinance No. X of 2021.



**CONSEILLER FRANK MAKEPEACE &  
CONSEILLER NICK MOLONEY**

**Report with Propositions to Christmas Chief Pleas, 21st January 2026**

**MOTION TO REQUIRE IMMEDIATE COMPLIANCE WITH THE  
JANUARY 2019 RESOLUTION ESTABLISHING A SCRUTINY  
COMMITTEE**

We note with serious concern that, nearly seven years after Chief Pleas resolved in January 2019 to establish a Scrutiny Committee (see Appendix One), no such committee has been formed or commenced its work, despite there being no subsequent resolution of Chief Pleas to pause, amend, or revoke that decision. Resolutions of Chief Pleas are binding on committees and officers. Failure to implement them undermines good governance, public confidence, and the constitutional authority of the legislature.

Chief Pleas is therefore asked to vote on the following propositions:

**Proposition 1 -**

**That Chief Pleas reaffirms that its resolution of January 2019 requiring the establishment of an independent Scrutiny Committee remains in full force and effect, and that no committee, officer, or informal body - including the Policy Development Group - has the authority to delay, reinterpret, or otherwise obstruct the implementation of a decision of Chief Pleas.**

**Proposition 2 -**

**That Chief Pleas directs that the Scrutiny Committee be constituted and populated at the Christmas 2025 meeting of Chief Pleas, strictly in accordance with the framework and membership principles agreed in January 2019, including the exclusion of Policy and Finance Committee members from membership.**

**Proposition 3 -**

**That Chief Pleas further directs that, once populated, the Scrutiny Committee shall be deemed operational immediately and may commence its work without the need for approval, oversight, or further proposal from the Policy and Finance Committee or any other committee.**

**Proposition 4 -**

**That Chief Pleas declares that no further discussion in the Policy Development Group or any other informal or advisory setting shall be considered relevant to, or capable of delaying, the implementation of this mandate.**

**Conseiller Frank Makepeace and Conseiller Nick Moloney**

## **POLICY & FINANCE COMMITTEE**

**Report with proposition to Christmas Chief Pleas, 16<sup>th</sup> January 2019**

### **ESTABLISHMENT OF A SCRUTINY MANAGEMENT COMMITTEE**

With the merging of the Policy and Performance and Finance and Resources Committees into a single Committee it is recognised that Chief Pleas needs a scrutiny function to guard against any possible abuse of power by this single policy committee.

It is proposed that we establish a new committee of Chief Pleas, the Scrutiny Management Committee, to be responsible for scrutinising the work of all Committees of Chief Pleas as described in Appendix 1.

#### **Proposition –**

**That Chief Pleas approves the establishment of a Scrutiny Management Committee as defined in the attached paper, the members of which will be nominated by the Policy Development Group to be confirmed by Chief Pleas at Easter Chief Pleas or earlier if there is an appropriate Chief Pleas meeting.**

**Conseiller Pauline Mallinson  
Member, Policy & Finance Committee**

## SCRUTINY MANAGEMENT COMMITTEE OF CHIEF PLEAS

### PURPOSE

To lead and co-ordinate the scrutiny of committees of Chief Pleas by reviewing and examining legislation, policies, services and the use of monies and other resources for which committees are responsible

### CONSTITUTION

A President who shall be a Conseiller of Chief Pleas: provided that the President of the Scrutiny Management Committee shall not be the Chair or a member of the Policy & Finance Committee or the Chair of any other Committee of Chief Pleas; and two members who shall be Conseillers of Chief Pleas: provided that a member of the Scrutiny Management Committee shall not be the Chair or a member of the Policy & Finance Committee or the Chair or Deputy Chair of any other Committee of Chief Pleas; and two voting members who shall not be Conseillers of Chief Pleas and who shall be elected by Chief Pleas.

### DUTIES AND POWERS

To lead and co-ordinate the scrutiny of committees of Chief Pleas and those organisations which are in receipt of public funds, by reviewing and examining legislation, policies, services and the use of monies and other resources for which committees are responsible.

As far as is reasonably practicable, to appoint scrutiny panels to carry out the work of reviewing and scrutinising committees' policies and services and their management of monies and other resources entrusted to them: provided that neither the President nor the members of the Policy & Finance Committee shall serve on such scrutiny panels and also provided that the Committee retains the power, if it so wishes, to carry out any review itself rather than through an appointed panel and also provided that the Committee shall at all times be responsible, and accountable to Chief Pleas, for everything done by the Committee and any panels it has appointed, including the content of any report issued under its name.

To promote and facilitate the participation in scrutiny of the widest possible range of Conseillers of Chief Pleas and persons independent of Chief Pleas.

When determining the subject of its reviews and examinations, to pay particular attention to the performance of committees in contributing to Chief Pleas' objectives and policy plans and to matters which are of substantial importance or of significant public interest.

To recognise that the carrying out of scrutiny in public where possible is likely to contribute positively to public perceptions of scrutiny.

To submit a report to Chief Pleas annually which reviews the work of the Committee and its panels over the previous 12 months and which sets out the Committee's objectives and, to the extent that

it is possible while retaining a flexible and responsive approach to scrutiny, an indicative programme of work over the next 12 months.

To represent the work of scrutiny in Chief Pleas, and publicly to promote and champion the value of scrutiny.

**POLICY & FINANCE COMMITTEE**

**Report with Propositions to Christmas Chief Pleas, 21st January 2026**

**REVISED MANDATE FOR THE  
SCRUTINY MANAGEMENT COMMITTEE**

The Scrutiny Management Committee (SMC) was established by a resolution of Chief Pleas at the Christmas meeting on 16th January 2019. Its mandate was subsequently revised at the Midsummer meeting on 3rd July 2019 to allow the Deputy Chairs of committees (excepting Policy & Finance) to serve on the SMC. It is understood that the SMC was not populated at the time or since, and consequently has never met.

At the time, the need for such a committee was stated to be:

*“With the merging of the Policy and Performance and Finance and Resources Committees into a single Committee it is recognised that Chief Pleas needs a scrutiny function to guard against any possible abuse of power by this single policy committee.”*

Despite the fact that the SMC has not yet met, the need for scrutiny of the Policy & Finance Committee has not gone away. Scrutiny of the work of other Chief Pleas committees is also important and necessary to ensure public accountability and good governance.

The SMC now needs to be populated and begin its work. However, in looking at the SMC mandate as agreed in 2019, the Policy and Finance Committee considers that some changes should be made to it to make it more fit for purpose for the present day.

Therefore, this proposition proposes a revised mandate for the SMC that makes minor changes to the composition of the committee and provides greater detail for the mandate and terms of reference.

The key changes include:

- Clarifying that the SMC is a standing committee of Chief Pleas, not a special committee, which was not explicit before, and therefore ensuring that the SMC operates under the same rules as, and receives the same committee office support as, any other standing committee;
- Reformatting the SMC’s mandate to the standard format for Standing Committees of Chief Pleas;

- Removing the possibility of direct scrutiny of councillors by other councillors by clarifying that the Scrutiny Pool, and the Panels drawn from the Pool, shall be not be councillors, although the non-Chief Pleas members of the SMC may serve on the panels;
- Being explicit that the Panels are independent of political interference and that their reports come unedited to Chief Pleas;
- Having an initial 2 year period, during which it is suggested that the committee largely focusses on the core functions of Chief Pleas and its Committees to improve the functioning of Chief Pleas;
- Also during the initial 2 years, asking the SMC itself to consider the effectiveness of scrutiny and to bring a report to Chief Pleas in early 2028 reflecting on the initial work and suggesting improvements for the future.
- Including Terms of Reference for the Scrutiny Panel Pool and for the Scrutiny Panels

### **Voting Rights of Non-Chief Pleas Members**

In line with its original 2019 mandate, the revised mandate for the SMC retains voting rights for the two non-Chief Pleas members. This requires a change to Section 4 of The Constitution and Operation of Chief Pleas Committees, which does not permit non-Chief Pleas members of any Committee to vote.

Therefore, a second proposition to amend The Constitution and Operation of Chief Pleas Committees to allow the non-Chief Pleas members of the Scrutiny Management Committee to vote is included here. This will be considered regardless of whether Proposition 1 succeeds or fails as it is also necessary for the original version of the mandate.

#### **Proposition 1 -**

**That Chief Pleas approves the revisions to the mandate of the Scrutiny Management Committee as defined in the attached paper**

#### **Proposition 2 -**

**That Chief Pleas approves the amendment of Section 4 of The Constitution and Operation of Chief Pleas Committees to allow the non-Chief Pleas members of the Scrutiny Management Committee to vote. No non-Chief Pleas members on other Committees shall have voting rights.**

**Conseiller John Guille**  
**Chairman, Policy & Finance Committee**

## **TERMS OF REFERENCE - Scrutiny Management Committee (SMC)**

(Standing Committee of Chief Pleas - Appointments & Governance Body)

### **1. Status**

The Scrutiny Management Committee (SMC) is a standing committee of Chief Pleas, constituted in accordance with the Constitution & Operation of Committees. It ensures that Chief Pleas serves Islanders effectively and transparently by checking, challenging, and recommending improvements, including considering whether public funds have been used efficiently, effectively and economically to deliver value for money for Islanders.

The SMC is responsible for the appointment, coordination and governance of the scrutiny system, including the appointment of a Scrutiny Panel Pool in order to strengthen scrutiny and accountability on Sark. Scrutiny Panels will be drawn from the members of the Scrutiny Panel Pool to consider specific topics.

The SMC will operate in two phases. For the first two years, reviews will concentrate mainly on examining core functions of Chief Pleas and its Committees to improve the functioning of Chief Pleas. Work on reviewing policy effectiveness and committee performance will include themes such as:

- Considering the effectiveness of the policies of, and services provided by, Committees of Chief Pleas and any organisations paid by Chief Pleas;
- Assessing the performance of Committees in implementing their policies and services;
- Identifying areas of policy or service delivery that might be improved;
- Promoting changes in policies and services where the evidence persuades the Committee that these require amendment;
- Undertaking public interest reviews if appropriate

Reports prepared by the Scrutiny Panels will be presented to Chief Pleas by the SMC.

During the initial two years, the SMC will also consider structures and processes for further improving scrutiny on Sark, including considering systems of scrutiny in other jurisdictions, and, in consultation with the Scrutiny Panel Pool, will present a report to Chief Pleas on the scrutiny system including potential improvements or changes. This report shall be presented to the Christmas meeting in 2028, and any changes will be implemented thereafter.

The SMC shall not have direct input into proposed legislation, which shall remain the remit of the relevant individual committee and Chief Pleas as a whole.



Other Committees are required to respond to reasonable requests from the SMC for information and to respond to the recommendations of any Scrutiny Report to foster accountability.

## **2. Membership**

The SMC shall comprise three members drawn from sitting Conseillers, provided that they are not members of the Policy and Finance Committee, nor the Chair of any other Standing Committee. In addition, there shall be two non-Chief Pleas members with voting rights, chosen for their expertise in finance, governance and/or policy development and implementation.

The SMC is permitted to consult with other Conseillers and with any other Committee as it wishes and finds appropriate.

## **3. Responsibilities**

### Appointments & Governance

- Agree a programme for scrutiny with Chief Pleas.
- Present reports on the findings of the Scrutiny Panels to Chief Pleas.
- Identify and appoint a Scrutiny Panel Pool comprised of up to 12 long-term Sark residents, former Conseillers (at least one full term served), former Channel Island politicians and others with expertise in finance, governance and policy issues.
- Appoint one or more Scrutiny Panel drawn from the Pool to consider issues, review policies and procedures, take oral and written evidence from Conseillers, experts and members of the public and draft reports on agreed topics.
- Appoint 3–5 individuals from the Pool to form each temporary scrutiny panel. The panel members shall not be sitting Conseillers, but the non-Chief Pleas members of the SMC may serve on a panel.
- Operate an open, transparent and independent recruitment process for membership of the Scrutiny Panel Pool for approval by Chief Pleas.
- Match skills and experience of panel members to scrutiny topics approved by Chief Pleas.

### Support & Oversight

- Issue topic-specific Terms of Reference to each temporary scrutiny panel.
- Through the Committee Office, provide administrative, procedural and logistical support to panels.
- Ensure panel members receive appropriate induction, training and development opportunities (e.g. via the CPA, and/or through Guernsey, Jersey or the UK).
- Ensure timely delivery of reports to Chief Pleas.

### Scrutiny Programme

- Prepare a draft Annual Scrutiny Programme for approval by Chief Pleas.

- Accept topic proposals from Conseillers, Committees, panel members or the public.
- Maintain a record of all scrutiny activity and outputs.

#### **4. Constraints**

The SMC must not:

- review or influence the evidence gathered by Scrutiny Panels;
- amend, revise, or steer Panel findings or recommendations;
- participate in scrutiny interviews, evidence sessions, or investigations except in exceptional circumstances, and then only as individuals and not as a committee;
- act in any capacity that compromises panel independence;
- conduct scrutiny itself.

#### **5. Two-Year Pilot and Review**

The SMC will operate for a two-year period in the first instance. During this time, it shall itself consider structures and processes for improving scrutiny on Sark, including considering systems of scrutiny in other jurisdictions. At the end of the two-year period, it shall present a report Chief Pleas on the scrutiny system including proposing potential improvements or changes.

## **TERMS OF REFERENCE - Scrutiny Panel Pool**

(Independent Members Appointed for a 2-Year Term)

### **1. Status**

The Scrutiny Panel Pool is an independent advisory body, not a committee of Chief Pleas. It consists of qualified individuals recommended by the SMC for approval by Chief Pleas to be available for selection to scrutiny panels.

Members are not required for every review but must be available to serve when called upon.

### **2. Composition**

The pool shall ideally include up to 12 independent members, drawn from:

- Long-term Sark residents
- Former Conseillers or other Chief Pleas members (minimum one term)
- Former Channel Island politicians with senior or scrutiny experience
- Subject specialists (finance, governance, education, medical, etc.)

No serving Conseiller may serve in the pool.

Pool members serve for a two-year term. Reappointment is at the discretion of the Chief Pleas.

### **3. Responsibilities**

Members of the pool must:

- Make themselves available for service on scrutiny panels when appointed.
- Maintain impartiality and confidentiality at all times.
- Undertake training if required.
- Identify potential issues or topics to the SMC where scrutiny may be beneficial.
- Uphold high standards of integrity, independence and fairness.

Standards & Conduct Pool members must:

- Declare any conflicts of interest immediately.
- Not speak publicly on scrutiny matters without authorisation from the SMC.
- Participate professionally in hearings, interviews, and evidence review.

Failure to comply may result in removal by the SMC.

## **TERMS OF REFERENCE - Scrutiny Panels**

(Independent members appointed for a fixed term on a project basis)

### **1. Status**

The Scrutiny Panels are independent advisory bodies, not committees of Chief Pleas. They shall consist of qualified individuals drawn by the SMC from the Scrutiny Panel Pool for a specific scrutiny panel. Support from the Committee Office may be provided for the panels as arranged by the SMC.

### **2. Composition**

Each panel shall comprise 3 to 5 members drawn from the Scrutiny Panel Pool. Once the relevant Scrutiny Panel has been selected, its members may seek assistance from relevant professional experts in the subject matter under scrutiny.

No serving Conseiller may serve on a scrutiny panel, but the non-Chief Pleas members of the SMC may do if called upon. The Panel may also call upon topic experts for evidence if it wishes.

Each Panel shall elect its own Chair.

### **3. Responsibilities**

Members of a scrutiny panel must:

- Maintain impartiality and confidentiality at all times.
- Undertake training as required.
- Identify potential issues or topics to the SMC where scrutiny may be beneficial.
- Uphold high standards of integrity, independence and fairness.

### **4. Standards & Conduct**

Panel members must:

- Declare any conflicts of interest immediately.
- Not speak publicly on scrutiny matters without authorisation.
- Participate professionally in hearings, interviews, and evidence review.

Failure to comply may result in removal by the SMC.

### **5. Term**

Panel members are appointed to serve on specific panels and will serve only through the completion of the work of their panel, but they may serve on more than one panel at a time. Panels dissolve automatically upon submission of their final report.

## **6. Responsibilities**

Each panel shall:

- Conduct evidence-based scrutiny of the topic set by Chief Pleas.
- Gather information, request documents, interview witnesses and hold hearings.
- Analyse policy effectiveness, financial stewardship and governance standards.
- Produce a written report including:
  - findings
  - conclusions
  - recommendations
- Operate transparently, holding public sessions where appropriate.
- Submit the final report to the SMC for presentation to Chief Pleas without alteration.
- The relevant committee(s) considered in a report should also see the report, and have a right of reply, which will be presented to Chief Pleas for consideration.

## **7. Independence**

Panels act entirely independently of:

- Committees,
- Chief Pleas,
- the SMC,
- political influence, or
- any other external pressure.

Findings are the sole responsibility of the panel.

## **8. Constraints**

Panels must not:

- Expand their remit beyond the terms of reference issued by the SMC.
- Interfere in committee operations.
- Act as advocacy bodies.
- Make policy decisions.
- Publish draft reports prior to SMC submission.
- Be influenced by Chief Pleas or the SMC in forming conclusions.





**POLICY & FINANCE COMMITTEE**

**Report with Proposition to Christmas Chief Pleas, 21<sup>st</sup> January 2026**

**CODE OF CONDUCT AND DECLARATION OF INTERESTS  
FOR MEMBERS OF CHIEF PLEAS**

**Code of Conduct**

At its Midsummer Meeting on 2nd July 2025, Chief Pleas agreed amendments to *The Reform (Sark) Law, 2008* to allow for the appointment of a Commissioner for Standards on a statutory basis. At the same meeting, Chief Pleas agreed also to a *Members of Chief Pleas Code of Conduct*.

Members subsequently sought clarity on the arrangements once the Commissioner had decided on an outcome. A revised Members of Chief Pleas Code of Conduct document was brought to the Michaelmas Meeting on 1st October 2025, but was withdrawn as minor drafting errors, such as misnumbered paragraphs, were discovered too late to be corrected. These errors have been corrected in this version.

The amendments, including corrections to the previous draft, themselves do not alter the underlying principles of the Members of Chief Pleas Code of Conduct, but rather provide arrangements in respect of how reports from the Commissioner for Standards are managed.

Should there be a case to answer and the Commissioner having decided on an outcome - remedial action, a caution or a formal report with sanction - they send a report to the Greffier who in turn forwards to the Policy and Finance Committee.

The Policy and Finance Committee then either presents the report to Chief Pleas for information (in cases of remedial action or a caution), or refers it to the Speaker of Chief Pleas for inclusion in the meeting agenda for debate (in cases involving a formal report with sanction). If a statutory meeting is six or more weeks away, the Policy and Finance Committee will make a request to the Speaker of Chief Pleas for an Extraordinary Meeting.

The Policy and Finance Committee now brings these amendments to Chief Pleas for approval by resolution. The Members of Chief Pleas Code of Conduct is accompanied by a Statement from the Commissioner for Standards, which mirrors the Code and is laid before Chief Pleas for information. Further to these documents, the Policy & Finance Committee wish also to amend the Chief Pleas of Sark Rules of Procedure to replace, at section 16, the sentence 'Conseillers shall abide by the 'Code of Conduct



- Conseillers of Chief Pleas' with 'Members of Chief Pleas shall abide by the Members of Chief Pleas Code of Conduct'.

### **Declaration of Interests**

At present, only Conseillers are required to complete a Declaration of Interests. To align with the Members of Chief Pleas Code of Conduct - which applies to the Seigneur, the Speaker (and their deputies), and Conseillers - it is proposed that Declarations be completed by *all* Members of Chief Pleas, i.e., including the Seigneur, Deputy Seigneur, the Speaker and the Deputy Speaker. To achieve this, the Policy and Finance Committee proposes to amend the Chief Pleas of Sark Rules of Procedure by replacing, at sections 15(1), (2), (3) and (4), references to Conseillers with Members of Chief Pleas.

### **Appendices:**

- Appendix One: Members of Chief Pleas Code of Conduct
- Appendix Two: Commissioner for Standards - Statement for Sark (also laid before)

### **Proposition 1 -**

**That Chief Pleas adopts the 'Members of Chief Pleas Code of Conduct', as attached.**

### **Proposition 2 -**

**That Chief Pleas amends the Rules of Procedure to replace the reference to the Conseillers Code of Conduct to Members of Chief Pleas Code of Conduct.**

### **Proposition 3 -**

**That Chief Pleas amends the Rules of Procedure so that Declaration of Interests apply to all Members of Chief Pleas.**

**Conseiller John Guille**  
**Chairman, Policy & Finance Committee**

## **CODE OF CONDUCT FOR MEMBERS OF CHIEF PLEAS OF SARK**

### **PART I: Purpose and Scope of the Code**

1. The purpose of the Code of Conduct is to assist Members of the Chief Pleas of Sark [hereinafter referred to as “Members”] in the discharge of their obligations to Chief Pleas, their constituents and the public. All Members are required to comply with the provisions of this code in all aspects of their public life. Whilst it does not seek to regulate what Members do in their purely private and personal lives they must, however, be aware that some private and personal matters may impinge on their public roles. The Code upholds Members’ right to freedom of expression.
2. The obligations set out in this Code are in addition to those which apply to all Members by virtue of the ‘Chief Pleas of Sark Rules of Procedure’ and ‘The Constitution and Operation of Chief Pleas Committees’.

### **Public Duty**

3. Members, before entering office, take an oath or affirm allegiance to be faithful and bear true allegiance to His Majesty The King, his heirs and successors, according to law.
4. The primary duties of Members are to act in the public interest and to serve conscientiously. In so doing Members have a duty on all occasions to act in accordance with their oaths, and in accordance with the public trust placed in them. The Code imposes ethical standards upon Members rather than service or performance standards.
5. Members have a duty to respect the rule of law and the administration of justice. In this context “law” includes such international law and treaty obligations as are for the time being applicable.
6. Members must give due priority to attendance at Meetings of the Chief Pleas of Sark and should be present in the chamber when the Chief Pleas of Sark are meeting except with reasonable excuse.

### **Principles of Conduct**

7. Members shall observe the following general principles of conduct for holders of public office:

**1.1 Selflessness:** Members must take decisions and act solely in terms of the public interest.

**1.2 Integrity:** Members must avoid placing themselves under any obligation to people or organisations that might try inappropriately to influence them in their work. They should not act or take decisions in order to gain financial or other material benefits for themselves, their family, or their friends. They must declare and resolve any interests and relationships.

**1.3 Objectivity:** In carrying out public business, including making public appointments awarding contracts, or recommending individuals for rewards and benefits, Members must act and take decisions impartially, fairly and on merit, using the best evidence and without discrimination or bias.

**1.4 Accountability:** Members are accountable for their decisions and actions to the Chief Pleas of Sark and the public and must submit themselves to whatever scrutiny is appropriate to their office to ensure this.

**1.5 Openness:** Members must act and take decisions in an open and transparent manner. Information should not be withheld from the public unless there are clear and lawful reasons for so doing.

**1.6 Honesty:** Members have a duty to be truthful.

**1.7 Leadership:** Members must exhibit these principles in their own behaviour and treat others with respect. They should actively promote and robustly support the principles and challenge poor behaviour wherever it occurs.

### **The Principles in Practice**

#### ***Conflict between Public and Private Interest***

8. Members shall base their conduct on a consideration of the public interest, avoid conflict between personal interest and the public interest and resolve any conflict between the two, at once, and in favour of the public interest. After leaving their official positions, they will not take improper advantage of their previous office.

#### ***Members' Conduct***

9. Members shall at all times conduct themselves in a manner which will tend to maintain and strengthen the public's trust and confidence in the integrity of the Chief Pleas of Sark and never undertake any action which would bring the Chief Pleas of Sark, or its Members generally, into disrepute.
10. Members shall at all times treat other Members, civil servants and members of the public with respect and courtesy and without malice, notwithstanding the disagreements on issues and policy which are a normal part of the political process. Members shall act in good conscience and exercise the privileges and discharge the duties of public office diligently and with civility, dignity, care and honour.
11. Members must not engage in unwanted behaviour, harassment, bullying or discrimination.

#### ***Relationship with the Civil Service***

12. Members shall uphold the political impartiality of the Civil Service and shall not ask civil servants to act in a manner which would conflict with the Civil Service Code. Members should familiarise themselves with the contents of that Code. In reaching decisions they shall give fair consideration and due weight to informed and impartial advice from civil servants, as well as to other considerations and advice from other persons.

#### ***Possible Inducements, including Gifts and Hospitality***

13. The acceptance by a Member of a bribe, including any fee, compensation or reward, to influence his or her conduct as a Member, in connection with the promotion of, or opposition to, any matter submitted or intended to be submitted to the Chief Pleas of Sark, or any Committee of the Chief Pleas of Sark, and any trading in influence to secure undue advantage is contrary to law.

14. The acceptance of hospitality may be acceptable in appropriate circumstances as a means of effecting the Chief Pleas of Sark's business. However, Members shall not accept gifts, hospitality or services that might appear to place the recipient under any form of obligation to the giver. In receiving any gift or hospitality Members should consider subjectively whether they would be prepared to justify acceptance to the public.
15. Members must comply with the requirements of the Rules of Procedure of the Chief Pleas of Sark concerning declarations of interests in respect of gifts and hospitality. Any money or tangible gifts received by a Member which are required to be declared must not be retained but must be transferred or delivered into the ownership of the Chief Pleas of Sark.

### ***Use of Chief Pleas of Sark Facilities***

16. To avoid misrepresentation of the Chief Pleas of Sark and to avoid the improper use of Chief Pleas of Sark's assets, Members must not use any goods, services or facilities provided for the functioning of government:
  - a) for private purposes; or
  - b) except where generally available in accordance with published arrangements to all Members.

### ***Register and Declaration of Members' Interests***

17. Members must fulfil conscientiously the requirements of the Rules of Procedure of the Chief Pleas of Sark in respect of the registration of interests in the Register of Members' Interests and must always draw attention to any relevant and material interest in any proceedings of the Chief Pleas of Sark, or its Committees.
18. A Member shall not knowingly or recklessly make a false statement in a Declaration of Unspent Convictions.
19. In any activities with, or on behalf of, any organisation with which a Member has a financial relationship, including activities which may not be a matter of public record such as informal meetings and functions, he or she must always bear in mind the need to be open and frank with the Speaker of Chief Pleas, Law Officers, Members and officials.

### ***Payments from Third Parties***

20. Members must not accept, from a third party, any payment or gift in respect of their participation in any proceedings of the Chief Pleas of Sark, or its Committees.

### ***Confidential Information***

21. Members must bear in mind that confidential information which they receive in the course of their duties may only be used in connection with those duties, and that such information must never be used for the purpose of financial gain or otherwise in their own personal interest or that of their families, friends, business associates or any voluntary or charitable organisation with which they are involved.
22. For the avoidance of doubt the 'confidential information' referred to in the previous section includes, but is not limited to, Committee minutes and other papers circulated to members thereof. The content of such minutes and other papers is not to be

disclosed to any third party other than by resolution of the Committee concerned.

23. In addition, Members shall not disclose publicly, or to any third party, personal information about named individuals which they receive in the course of their duties, unless it is both lawful and clearly in the wider public interest to do so. Members must, at all times, have regard to all relevant data protection, human rights and other legislation when dealing with confidential information and must be aware of the consequences of breaching confidentiality.
24. For the avoidance of doubt, all correspondence, howsoever received, between a Committee and a Member of the Chief Pleas of Sark shall be treated as confidential unless expressed otherwise and shall not be disclosed to any third party, whether within the Chief Pleas of Sark or outside, in whole or in part, by any means, without the express consent of the author of that correspondence.
25. Members shall not disclose details in relation to a Code of Conduct investigation except when authorised by law or by the investigatory authority. Information on complaints against Members for alleged breaches of the Code of Conduct is considered confidential information and should remain confidential from the point of submission until the complaint has been finally determined.

*Note: The obligations under section 23 not to disclose personal information publicly or to any third party, and under section 24 to treat correspondence as confidential and not to disclose correspondence to any third party, shall be treated as not having been breached or disregarded where the disclosure or treating takes place in accordance with arrangements approved for the operation and management of a private office or administrative scheme under section 26.*

### **Members Operating a Private Office or Administrative Scheme**

26. The senior Civil Servant may from time to time approve arrangements for the operation and management of any private office or administrative scheme that are proposed by any Member and are intended for the purpose of enabling that Member to deal with correspondence and information relating to the affairs or business of the Chief Pleas of Sark or any committee of the Chief Pleas of Sark.

### **Part II: Complaints to the Commissioner for Standards**

27. Any person may complain to the Commissioner for Standards (the Commissioner) that a Member has breached the Code of Conduct relating to Part I matters.
28. The conduct of Members during Meetings of the Chief Pleas of Sark is normally dealt with by the Speaker of Chief Pleas (known also as the Presiding Officer in this document) through application of the Rules of Procedure relating to maintaining order during proceedings. If, in the course of dealing with such a matter, the Speaker of Chief Pleas considers that the conduct requires further or fuller investigation, they may also refer the matter to the Commissioner for Standards.
29. Should a Member wish to raise a complaint about the conduct of the Speaker of Chief Pleas during a meeting of Chief Pleas, they may do so through by the normal means to the Commissioner for Standards.
30. Complaints, whether from Members or from members of the public, alleging that the conduct of a Member is in breach of the Code of Conduct set out in Part I must be addressed in writing to the Commissioner.
31. In the interests of natural justice, a complaint submitted to the Commissioner must remain confidential from the point of submission until the complaint has been determined, unless disclosure is authorised.
32. Whilst a complaint will normally be submitted by a third party, the Commissioner may initiate an investigation if they believe that a breach of the Code may have occurred. A Member can also request that their own behaviour is investigated by the Commissioner to establish if a breach of the Code has taken place.
33. Members must not make frivolous, vexatious or manifestly unfounded complaints to the Commissioner for Standards and where the Commissioner is of opinion that a complaint is frivolous, vexatious or manifestly unfounded, the Commissioner shall not initiate an investigation into the complaint.
34. Immediately upon receipt of a complaint, or notification that the Commissioner is initiating an investigation, the Commissioner shall notify the Member concerned that a complaint has been made and the nature of the complaint.
35. All Members are required to co-operate fully and promptly with the Commissioner during any consideration and/ or investigation, even if the Member concerned considers that the alleged breach is unsubstantiated. Failure to co-operate in any investigation will, in itself, be regarded as a breach of the Code.

36. If the Commissioner, in the course of the investigation, has cause to believe that a criminal offence may have been committed, he or she shall immediately suspend the proceedings and forthwith refer the matter to the Police. The investigation shall not be resumed until either judicial proceedings have been concluded or the Police have certified to the Commissioner that they have no further interest in the matter.
37. The Commissioner may decide to agree remedial action with the Member. Remedial action may be agreed if the complaint, though justified, is minor and is acknowledged by the Member concerned. Remedial action involves “putting the record straight”, for instance by making an amendment to the Register of Interests. The Member will normally be expected to make a formal apology, either in writing or by means of a formal statement to the Chief Pleas of Sark.
38. If the Commissioner and Member agree remedial action, the Commissioner will make a report of the matter and remedial action to the Greffier for forwarding to the Policy & Finance Committee, which will place the report for information before the Chief Pleas of Sark at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. The Commissioner will inform the complainant of the action taken in response to the complaint.
39. Where the Commissioner finds that a complaint has been substantiated but is of the view that the breach of conduct was of a minor nature he or she will normally dispose of the matter by cautioning the Member concerned. A report of the Commissioner’s decision in such cases shall be sent to the Greffier for forwarding to the Policy & Finance Committee, which will place the report for information before the Chief Pleas of Sark at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. The Commissioner will inform the complainant of the action taken in response to the complaint.
40. Where the Commissioner finds that a complaint has been substantiated and is of the opinion that the Member should be formally reprimanded, suspended, removed from a particular office or expelled, or, where a Member refuses to accept a caution in the circumstances set out in the previous section, he or she shall report their findings to the Greffier for forwarding to the Policy & Finance Committee which will submit the report - with the Commissioner’s recommendations - to the Presiding Officer for inclusion in the next Chief Pleas of Sark’s meeting agenda for debate at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. Notwithstanding a Member’s refusal to accept a caution, the Chief Pleas of Sark may resolve that the Member be cautioned. The Commissioner will inform the complainant of the action taken in response to the complaint.
41. There is a right of appeal against a decision of the Commissioner for Standards in accordance with the provisions of The Reform (Sark) Law, 2008 and the mechanism established by the Commissioner for Standards thereunder.
42. For the avoidance of doubt, mediation between the complainant and the accused Member is not permitted in the processing of complaints made pursuant to this Code of Conduct.

### Definitions

43. In this Code:



## APPENDIX ONE

- “Members of the Chief Pleas of Sark” and “Members” means the Seigneur and Speaker of Chief Pleas (and any deputies thereof), and Conseillers.
- “Bullying” means offensive, intimidating, malicious or insulting behaviour; or an abuse or misuse of power in a way that intends to undermine, humiliate, criticise unfairly or injure someone, whether through persistent behaviour or a single grossly unacceptable act;
- “Discrimination” includes behaviour that discriminates against any person on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, political opinion and language preference;
- “Harassment” means unwanted conduct which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for an individual and includes sexual harassment;
- “Unwanted behaviour” means behaviour which is not encouraged or reciprocated by the recipient, regardless of whether it was meant to cause offence, and whether it is repeated or an isolated incident.

44. In interpreting and applying the definitions of "bullying", harassment", "discrimination" and "unwanted behaviour":

1. The intention of the person complained about is irrelevant;
2. The test is whether a reasonable and impartial person would consider the conduct would fall within one of the definitions having regard to the context of the behaviour complained about; and
3. The respective rights under the Human Rights (Bailiwick of Guernsey) Law, 2000 of both the person complained about and the person subject to the conduct in question must be respected.

45. The disciplines and standards of behaviour prescribed are also applicable in the context of electronic communications.



**Annex 1**

**COMMISSIONER FOR STANDARDS**

**Commissioner for Standards:** Dr Melissa McCullough

**Address:**  
Commissioner for Standards  
c/o Committee Office  
La Chasse Murette Sark  
GY10 1SE

**E-mail Address:** [commissioner@pi-cfs.org](mailto:commissioner@pi-cfs.org)

**Website Address:** <https://pi-cfs.org>

## COMMISSIONER FOR STANDARDS - STATEMENT FOR SARK

1. The Commissioner for Standards (“the Commissioner”) investigates complaints of alleged breaches of the Code of Conduct for Members of the Chief Pleas of Sark (“the Code”). The Commissioner considers complaints made by third parties and can also initiate her own investigation if she believes that, at a relevant time, a breach of the Code may have occurred. A Member of the Chief Pleas of Sark (“Member”) can also request that their own behaviour is investigated by the Commissioner to establish whether there has been a breach of the Code.

### Complaints

2. Whether the complainant is a member of the public or a Member of the Chief Pleas, they may wish to consider whether it might first be useful, if appropriate, to try to resolve their complaint informally.
3. Any complaint alleging that a Member of the Chief Pleas has breached the Code must be made in writing to the Commissioner via one of the following means:
  1. By email: [commissioner@pi-cfs.org](mailto:commissioner@pi-cfs.org)
  2. Online via the website: <https://pi-cfs.org/>
  3. By Post to: Commissioner for Standards, c/o Committee Office, La Chasse Murette, Sark, GY10 1SE
4. In order for a complaint to be considered it should:
  - a. be made in writing;
  - b. state the name of the complainant;
  - c. state the email, telephone and postal address of the complainant (unless the complainant is a current Member);
  - d. name the person who is the subject of the complaint;
  - e. state the acts or omissions of the Member complained of which are alleged to have breached the Code;
  - f. state the relevant provision or provisions of the Code which each act or omission is alleged to have breached;
  - g. in relation to each act or omission complained of, be substantiated by sufficient evidence that there is a *prima facie* case that a breach of the Code has occurred and that the complaint is not frivolous or vexatious or otherwise an abuse of the complaints process; and
  - h. relate to alleged conduct which falls within the scope of the Code.

5. The Commissioner has the discretion to consider a complaint even where c, e, f or g in the above criteria haven't been met.

### **Preliminary Assessment**

6. The Commissioner will conduct a preliminary assessment of all complaints. The Commissioner cannot consider complaints that fall outside the scope of the Code or complaints which she deems frivolous or vexatious. She will not consider complaints that substantially repeat allegations which have already been the subject of consideration (unless there is fresh evidence in their support).
7. The Commissioner will not consider anonymous complaints<sup>1</sup> or complaints where the complainant is not prepared to have their name and complaint disclosed to the Member complained about. The complainant's details will be included in all correspondence including any report submitted to the Policy & Finance Committee or Chief Pleas with the exception of complaints that relate to unacceptable behaviours (see 10 below).
8. Matters falling within the Commissioner's remit include:
  - a. failure to adhere to the requirements of the Code;
  - b. failure to register relevant interests;
  - c. failure to declare relevant interests in the course of parliamentary business including committee proceedings;
  - d. unacceptable behaviour including bullying, harassment, sexual harassment, intimidation and victimisation.
9. Matters not falling within the Commissioner's remit include:
  - a. policy matters or a members' political views or opinions;
  - b. service or performance standards or outcomes received (other than in exceptional circumstances);
  - c. a complaint from a person who is not a Member of Chief Pleas regarding words spoken by, or actions of, a Member during a meeting of the Chief Pleas;
  - d. a complaint about a former Member of Chief Pleas (unless in relation to sections 22, 23 and 24 (confidential information)).

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<sup>1</sup> The Commissioner is statutorily barred from investigating anonymous complaints. Notwithstanding this exclusion, the Commissioner may consider anonymous complaints where they provide corroborating evidence for admissible complaints.

### **Complaints Relating to Unacceptable Behaviour**

10. Unacceptable behaviour can be defined as any form of unwanted, unreasonable and offensive conduct that has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. Conduct shall be regarded as having this effect only if, having regard to all circumstances and in particular the complainant's perception, it should reasonably be considered as having that effect.
11. Complaints relating to bullying, harassment, sexual harassment, intimidation and victimisation are intended to address such behaviour or conduct whether it occurs in person or remotely, for example by email, phone, text or through social media. Such behaviour or conduct may occur in a single and isolated serious incident or in multiple incidents occurring over a period of time.
12. Members have a right to freedom of expression and this includes disagreements on issues and policy which are a normal part of the political process.
13. Due to the sensitive nature of complaints concerning unacceptable behaviour, the Commissioner will not normally disclose the complainant's name or details in the final report of any such investigation, unless the complainant has expressly agreed to such disclosure.
14. The Commissioner encourages anyone who believes they have experienced unacceptable behaviour to consider using an informal approach to resolve the matter in the first instance. However, this is not a prerequisite for submitting a formal complaint.

### **Discontinuation of a Complaint**

15. The Commissioner may discontinue consideration of a complaint if at any time she is satisfied that:
  - a. the complaint is frivolous or vexatious or otherwise an abuse of the complaints process;
  - b. the complainant has, without reasonable excuse, failed to co-operate with the Commissioner;
  - c. the alleged conduct is not sufficiently serious to justify further consideration;
  - d. the complainant no longer wishes to bring the complaint;
  - e. the complaint would more appropriately be investigated by the police or other public body;
  - f. it is not in the public interest to proceed with the consideration of the complaint; or
  - g. any Member, in respect of whom she is considering a complaint, no longer holds office as a Member of Chief Pleas (unless in relation to sections 22, 23 and 24 (confidential information)).

### Investigation: Procedural Safeguards

16. The Commissioner determines the procedure and timing of any investigation.
17. The Commissioner will make arrangements to facilitate any complainant who is not able to submit their complaint in writing, for example due to disability or language difficulties.
18. Confidentiality is essential for all parties involved in the complaints process. This includes not only the person making the complaint but also the individual against whom the allegation has been made. Given their public roles, Members may be particularly concerned about unproven allegations being disclosed or repeated publicly before a full investigation has taken place. In the interests of fairness, any complaint submitted to the Commissioner must remain private and confidential from the point of submission until the matter has been fully determined, unless disclosure is expressly authorised. For example, disclosure may be necessary if the complainant is a Member who must declare an interest, such as having submitted a complaint to the Commissioner.
19. Information collated in relation to complaints will be held and managed in accordance with the [Data Protection \(Bailiwick of Guernsey\) Law, 2017, as amended](#) and Data Protection principles.
20. The police and other agencies investigate allegations of criminal misconduct and the Commissioner will not investigate any related allegation of a breach of the Code while the police or other agency is conducting its own investigation. The same suspension of investigation applies while related proceedings (for instance any action for defamation) are before a court of law.
21. Where during an investigation the Commissioner decides that the conduct of a Member of Chief Pleas should be investigated by the police or other public body or agency, the Commissioner may liaise with the police or such other public body or agency as they deem appropriate.
22. In investigating and adjudicating allegations of non-compliance with the Code, the Commissioner shall act in accordance with the principles of natural justice and fairness.
23. Proceedings are not adversarial, but inquisitorial in nature. The Commissioner is an independent and impartial investigator appointed by Chief Pleas, whose task is to establish the facts of a case. She reports these, along with her conclusions as to whether or not there has been a breach of the Code and her recommendations, to the Greffier.
24. The Commissioner's conclusions and recommendations are binding.
25. Members are expected to co-operate with any investigation into their conduct; requested written evidence must be in their own name and letters sent on their behalf by legal advisers or others may be disregarded. Members may be accompanied to any meeting or interview by a colleague, friend or legal adviser.

However, every effort is made to keep proceedings informal and there is no expectation that they should be so accompanied. If a Member chooses to bring a colleague, friend or adviser, they are free to consult him or her off the record, but they will be expected to answer for themselves (and not through the friend or adviser) any questions put to them.

26. The complainant has no formal *locus* once an investigation is under way and has no right to be called as a witness. The complainant is expected to co-operate with any investigation and to answer any questions and supply all evidence in his or her possession when asked to do so.
27. Members accused of misconduct have no entitlement to cross-examine complainants, though they are given an opportunity to review and challenge the Commissioner's findings of fact prior to finalising her report.
28. The civil standard of proof is adopted at all stages in the investigation process by the Commissioner. Therefore, in order to find against a Member, the Commissioner needs to be satisfied that the allegation is proven on the balance of probabilities, that is, "more likely than not".

### **Confidentiality**

29. From the point that the Commissioner receives a complaint, all evidence and correspondence relating directly to the inquiry must remain confidential unless and until it is published by the Greffier.

### **Investigations: General Procedure**

30. On receipt of a complaint, the Commissioner will write to the complainant at the earliest opportunity to acknowledge receipt of their complaint. At the same time, she will send a copy to the Greffier and will inform the Member concerned of the complaint and provide a copy of the complaint and any evidence offered in support of it. At the same time she will often invite the Member to respond in writing with a full and accurate account of the matters in question.
31. Following her preliminary assessment, the Commissioner will inform both the complainant and the Member concerned whether or not she will investigate the complaint. If she has decided that the complaint does not merit investigation, she will provide the complainant and the Member concerned with a brief explanation of her reason(s) for dismissing the complaint. This will be copied to the Greffier who will retain the copy in confidence for the length of the Members' service and five years thereafter.
32. Where the Commissioner finds that a complaint has been substantiated but is of the view that the breach of conduct was of a minor nature, she will normally dispose of the matter by cautioning the Member concerned. A report of the Commissioner's decision in such cases shall be sent to the Greffier for forwarding to the Policy & Finance Committee, which will place the report for information before the Chief Pleas of Sark at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. The Commissioner will inform the complainant of the

action taken in response to the complaint.

33. Alternatively, the Commissioner may decide to agree remedial action with the Member. Remedial action may be agreed if the complaint, though justified, is minor and is acknowledged by the Member concerned. Remedial action involves “putting the record straight”, for instance by making an amendment to the Register of Interests of Members. The Member will normally be expected to make a formal apology, either in writing or by means of a formal statement to Chief Pleas. If the Commissioner and Member agree remedial action, the Commissioner will make a report of the matter and remedial action to the Greffier for forwarding to the Policy & Finance Committee, which will place the report for information before the Chief Pleas of Sark at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. The Commissioner will inform the complainant of the action taken in response to the complaint.
34. If remedial action is not considered appropriate by the Commissioner in the circumstances, and the Member’s response is not sufficient to enable the Commissioner either to dismiss the complaint or agree remedial action, the Commissioner may pursue an investigation. This can include seeking further information, either from the Member concerned or others, including the original complainant, third parties, or public or private bodies. Such information may be sought in writing or the Commissioner may decide to interview witnesses either informally or by means of formal oral evidence. The Commissioner holds her meetings with witnesses in private. In the case of informal interviews, a note will be made of the meeting and all parties to the interview will subsequently be asked to confirm its accuracy. In the case of formal oral evidence, a recording and full transcript will be made. All interviewees will be sent a formal transcript and will be provided 14 calendar days for review.
35. The Commissioner has the power under 'Part 3, paragraph 11 of the Third Schedule to The Reform (Sark) (Amendment) Law, 2025 to summons people to appear and to provide documents.
36. Part 3, paragraphs 12 to 16 of the Third Schedule to The Reform (Sark) (Amendment) Law, 2025 sets out the criminal offences and related penalties arising from any failure to assist the Commissioner in the discharge of her functions. In particular, it should be noted that any person who, without reasonable excuse, refuses to comply with a requirement of the Commissioner, or gives false or misleading information to the Commissioner or otherwise interferes with witnesses, or obstructs the Commissioner or destroys documents, is liable to prosecution.
37. Part 4 sets out the relevant personal and professional privilege protections which apply.

## **Assessing the evidence**

38. If the Commissioner’s investigation has uncovered material evidence that is at variance with the Member’s version of events, she will put this to the Member, who will have the chance to challenge it.

39. Before finalising her report, the Commissioner will share with the Member a draft of her findings of fact and provide the Member with an opportunity to comment. The Commissioner may also share with the complainant a draft of her findings of fact on a confidential basis, where the Commissioner considers it is appropriate in the circumstances to do so. All parties are provided 14 calendar days to make any challenges.
40. If, having considered the Member's comments, the Commissioner considers that there remain significant contested issues of fact, she will prepare her own account of the facts of the case, while drawing attention to those points which are contested.
41. The Commissioner reports their findings to the Greffier in the following form:
  - a. a summary of the initial complaint and of the relevant elements of the Code;
  - b. a brief account of the key facts in the case, with reference to evidence as appropriate, and with any contested points of fact highlighted;
  - c. their findings with reasons as to whether or not the Code has been breached and any relevant evidence, written and oral;
  - d. a recommendation as to what action, if any, should be taken.
42. The Commissioner shall report their findings to the Greffier for forwarding to the Policy & Finance Committee which will submit the report - with the Commissioner's recommendations - to the Presiding Officer for inclusion in the next Chief Pleas of Sark's meeting agenda for debate at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. The Commissioner will inform the complainant of the action taken in response to the complaint.

### **Right to appeal the decision of the Commissioner**

43. An appeal against a decision by the Commissioner can be made either by the complainant or the respondent to the Greffier who will allocate the appeal to one of the available Appeals Commissioners ("AC").
44. The role of the AC is to review the decisions taken by the Commissioner. The AC does not re-investigate the allegations during an appeal, nor does he/she take fresh decisions on the basis of the investigation.
45. To submit an appeal, it must be:
  - a. made in writing
  - b. submitted by the complainant or respondent, not by an adviser or supporter
  - c. submitted within 20 working days of being notified of the Commissioner's decision<sup>2</sup>
  - d. set out which of the below grounds apply
46. An appeal can be brought under one or more of the following grounds:

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<sup>2</sup> The deadline may be extended if there are mitigating circumstances. A request for an extension should be done as early as possible and before the appeal deadline. Any request should clearly state the mitigating circumstances and, where appropriate, provide evidence of such circumstances. Any request for an extension to the deadline must be made by the complainant or respondent, not by an adviser or supporter, and there is no guarantee the extension will be approved.



- a. there was a material error in the relevant investigation by the Commissioner that affected the decision,
  - b. the decision was unreasonable,
  - c. the process followed by the Commissioner in reaching the decision was flawed,
  - d. credible new evidence has become available which, if accepted, would have a real prospect of affecting the decision,
  - e. in the case of a decision to impose a sanction, the sanction imposed was disproportionate, or
  - f. there is another compelling reason to allow an appeal to be made.
47. An appeal submission should include as much detail as necessary to consider the appeal and to understand the nature of the issues being raised.<sup>3</sup>
48. Where an appeal is wholly or partly on the grounds of credible fresh evidence, that evidence should be included in the appeal submission or by way of a summary.
49. The AC will:
  - a. consider whether the issues raised in the appeal fall within one or more of the grounds for appeal and whether there is any substance to the grounds;
  - b. consider whether to disclose an appeal submission to the other party. This will normally only be if the AC wishes to request further information from them or to ask them to respond to a specific point;
  - c. consider the substantive appeal and reach a conclusion on the merits. The AC may request additional evidence but will not conduct a re-hearing of the case.
50. The AC will normally decide the appeal based on written submissions. Exceptionally, the AC may decide that it should hold an oral hearing with one or both of the parties (separately), but only if there is a specific reason for doing so.
51. The AC will apply the civil standard of proof, the balance of probabilities, as applied by the Commissioner.
52. The AC will make a decision on the appeal and say whether or not the complaint has been upheld. Depending on the outcome, the AC may then need to go on to consider the question of sanction. The AC can uphold, reduce or increase the sanction. In cases where the complaint has not been upheld, no sanction will be imposed.
53. The AC will report their findings to the Greffier. The Greffier will notify the complainant and the Member and at the same time will send the report to Policy & Finance Committee for them to forward to the Chief Pleas of Sark. The AC's report will be handled in the same manner as a report from the Commissioner.
54. The AC may, exceptionally, require or recommend that the complaint is re-

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<sup>3</sup> The AC may or may not ask for more information. Insufficient supporting information in an appeal submission may reduce the likelihood that the AC will decide that there is any substance to the grounds raised.

investigated taking into account its decision.

55. The decision of the AC is final and cannot be appealed.

*28th August 2025*

*Dr Melissa McCullough  
Commissioner for Standards*

### COMMISSIONER FOR STANDARDS - STATEMENT FOR SARK

1. The Commissioner for Standards (“the Commissioner”) investigates complaints of alleged breaches of the Code of Conduct for Members of the Chief Pleas of Sark (“the Code”). The Commissioner considers complaints made by third parties and can also initiate her own investigation if she believes that, at a relevant time, a breach of the Code may have occurred. A Member of the Chief Pleas of Sark (“Member”) can also request that their own behaviour is investigated by the Commissioner to establish whether there has been a breach of the Code.

#### Complaints

2. Whether the complainant is a member of the public or a Member of the Chief Pleas, they may wish to consider whether it might first be useful, if appropriate, to try to resolve their complaint informally.
3. Any complaint alleging that a Member of the Chief Pleas has breached the Code must be made in writing to the Commissioner via one of the following means:
  1. By email: [commissioner@pi-cfs.org](mailto:commissioner@pi-cfs.org)
  2. Online via the website: <https://pi-cfs.org>
  3. By post to: Commissioner for Standards, c/o Committee Office, La Chasse Murette, Sark, GY10 1SE
4. In order for a complaint to be considered it should:
  - a. be made in writing;
  - b. state the name of the complainant;
  - c. state the email, telephone and postal address of the complainant (unless the complainant is a current Member);
  - d. name the person who is the subject of the complaint;
  - e. state the acts or omissions of the Member complained of which are alleged to have breached the Code;
  - f. state the relevant provision or provisions of the Code which each act or omission is alleged to have breached;
  - g. in relation to each act or omission complained of, be substantiated by sufficient evidence that there is a *prima facie* case that a breach of the Code has occurred and that the complaint is not frivolous or vexatious or otherwise an abuse of the complaints process; and
  - h. relate to alleged conduct which falls within the scope of the Code.

5. The Commissioner has the discretion to consider a complaint even where c, e, f or g in the above criteria haven't been met.

### **Preliminary Assessment**

6. The Commissioner will conduct a preliminary assessment of all complaints. The Commissioner cannot consider complaints that fall outside the scope of the Code or complaints which she deems frivolous or vexatious. She will not consider complaints that substantially repeat allegations which have already been the subject of consideration (unless there is fresh evidence in their support).
7. The Commissioner will not consider anonymous complaints<sup>1</sup> or complaints where the complainant is not prepared to have their name and complaint disclosed to the Member complained about. The complainant's details will be included in all correspondence including any report submitted to the Policy & Finance Committee or Chief Pleas with the exception of complaints that relate to unacceptable behaviours (see 10 below).
8. Matters falling within the Commissioner's remit include:
  - a. failure to adhere to the requirements of the Code;
  - b. failure to register relevant interests;
  - c. failure to declare relevant interests in the course of parliamentary business including committee proceedings;
  - d. unacceptable behaviour including bullying, harassment, sexual harassment, intimidation and victimisation.
9. Matters not falling within the Commissioner's remit include:
  - a. policy matters or a members' political views or opinions;
  - b. service or performance standards or outcomes received (other than in exceptional circumstances);
  - c. a complaint from a person who is not a Member of Chief Pleas regarding words spoken by, or actions of, a Member during a meeting of the Chief Pleas;
  - d. a complaint about a former Member of Chief Pleas (unless in relation to sections 22, 23 and 24 (confidential information)).

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<sup>1</sup> *The Commissioner is statutorily barred from investigating anonymous complaints. Notwithstanding this exclusion, the Commissioner may consider anonymous complaints where they provide corroborating evidence for admissible complaints.*

### **Complaints Relating to Unacceptable Behaviour**

10. Unacceptable behaviour can be defined as any form of unwanted, unreasonable and offensive conduct that has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. Conduct shall be regarded as having this effect only if, having regard to all circumstances and in particular the complainant's perception, it should reasonably be considered as having that effect.
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12. Members have a right to freedom of expression and this includes disagreements on issues and policy which are a normal part of the political process.
13. Due to the sensitive nature of complaints concerning unacceptable behaviour, the Commissioner will not normally disclose the complainant's name or details in the final report of any such investigation, unless the complainant has expressly agreed to such disclosure.
14. The Commissioner encourages anyone who believes they have experienced unacceptable behaviour to consider using an informal approach to resolve the matter in the first instance. However, this is not a prerequisite for submitting a formal complaint.

### **Discontinuation of a Complaint**

15. The Commissioner may discontinue consideration of a complaint if at any time she is satisfied that:
  - a. the complaint is frivolous or vexatious or otherwise an abuse of the complaints process;
  - b. the complainant has, without reasonable excuse, failed to co-operate with the Commissioner;
  - c. the alleged conduct is not sufficiently serious to justify further consideration;
  - d. the complainant no longer wishes to bring the complaint;
  - e. the complaint would more appropriately be investigated by the police or other public body;
  - f. it is not in the public interest to proceed with the consideration of the complaint; or
  - g. any Member, in respect of whom she is considering a complaint, no longer holds office as a Member of Chief Pleas (unless in relation to sections 22, 23 and 24 (confidential information)).

### Investigation: Procedural Safeguards

16. The Commissioner determines the procedure and timing of any investigation.
17. The Commissioner will make arrangements to facilitate any complainant who is not able to submit their complaint in writing, for example due to disability or language difficulties.
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21. Where during an investigation the Commissioner decides that the conduct of a Member of Chief Pleas should be investigated by the police or other public body or agency, the Commissioner may liaise with the police or such other public body or agency as they deem appropriate.
22. In investigating and adjudicating allegations of non-compliance with the Code, the Commissioner shall act in accordance with the principles of natural justice and fairness.
23. Proceedings are not adversarial, but inquisitorial in nature. The Commissioner is an independent and impartial investigator appointed by Chief Pleas, whose task is to establish the facts of a case. She reports these, along with her conclusions as to whether or not there has been a breach of the Code and her recommendations, to the Greffier.
24. The Commissioner's conclusions and recommendations are binding.
25. Members are expected to co-operate with any investigation into their conduct; requested written evidence must be in their own name and letters sent on their behalf by legal advisers or others may be disregarded. Members may be accompanied to any meeting or interview by a colleague, friend or legal adviser.

However, every effort is made to keep proceedings informal and there is no expectation that they should be so accompanied. If a Member chooses to bring a colleague, friend or adviser, they are free to consult him or her off the record, but they will be expected to answer for themselves (and not through the friend or adviser) any questions put to them.

26. The complainant has no formal *locus* once an investigation is under way and has no right to be called as a witness. The complainant is expected to co-operate with any investigation and to answer any questions and supply all evidence in his or her possession when asked to do so.
27. Members accused of misconduct have no entitlement to cross-examine complainants, though they are given an opportunity to review and challenge the Commissioner's findings of fact prior to finalising her report.
28. The civil standard of proof is adopted at all stages in the investigation process by the Commissioner. Therefore, in order to find against a Member, the Commissioner needs to be satisfied that the allegation is proven on the balance of probabilities, that is, "more likely than not".

### **Confidentiality**

29. From the point that the Commissioner receives a complaint, all evidence and correspondence relating directly to the inquiry must remain confidential unless and until it is published by the Greffier.

### **Investigations: General Procedure**

30. On receipt of a complaint, the Commissioner will write to the complainant at the earliest opportunity to acknowledge receipt of their complaint. At the same time, she will send a copy to the Greffier and will inform the Member concerned of the complaint and provide a copy of the complaint and any evidence offered in support of it. At the same time she will often invite the Member to respond in writing with a full and accurate account of the matters in question.
31. Following her preliminary assessment, the Commissioner will inform both the complainant and the Member concerned whether or not she will investigate the complaint. If she has decided that the complaint does not merit investigation, she will provide the complainant and the Member concerned with a brief explanation of her reason(s) for dismissing the complaint. This will be copied to the Greffier who will retain the copy in confidence for the length of the Members' service and five years thereafter.
32. Where the Commissioner finds that a complaint has been substantiated but is of the view that the breach of conduct was of a minor nature, she will normally dispose of the matter by cautioning the Member concerned. A report of the Commissioner's decision in such cases shall be sent to the Greffier for forwarding to the Policy & Finance Committee, which will place the report for information before the Chief Pleas of Sark at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. The Commissioner will inform the complainant of the

action taken in response to the complaint.

33. Alternatively, the Commissioner may decide to agree remedial action with the Member. Remedial action may be agreed if the complaint, though justified, is minor and is acknowledged by the Member concerned. Remedial action involves “putting the record straight”, for instance by making an amendment to the Register of Interests of Members. The Member will normally be expected to make a formal apology, either in writing or by means of a formal statement to Chief Pleas. If the Commissioner and Member agree remedial action, the Commissioner will make a report of the matter and remedial action to the Greffier for forwarding to the Policy & Finance Committee, which will place the report for information before the Chief Pleas of Sark at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. The Commissioner will inform the complainant of the action taken in response to the complaint.
34. If remedial action is not considered appropriate by the Commissioner in the circumstances, and the Member’s response is not sufficient to enable the Commissioner either to dismiss the complaint or agree remedial action, the Commissioner may pursue an investigation. This can include seeking further information, either from the Member concerned or others, including the original complainant, third parties, or public or private bodies. Such information may be sought in writing or the Commissioner may decide to interview witnesses either informally or by means of formal oral evidence. The Commissioner holds her meetings with witnesses in private. In the case of informal interviews, a note will be made of the meeting and all parties to the interview will subsequently be asked to confirm its accuracy. In the case of formal oral evidence, a recording and full transcript will be made. All interviewees will be sent a formal transcript and will be provided 14 calendar days for review.
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36. Part 3, paragraphs 12 to 16 of the Third Schedule to The Reform (Sark) (Amendment) Law, 2025 sets out the criminal offences and related penalties arising from any failure to assist the Commissioner in the discharge of her functions. In particular, it should be noted that any person who, without reasonable excuse, refuses to comply with a requirement of the Commissioner, or gives false or misleading information to the Commissioner or otherwise interferes with witnesses, or obstructs the Commissioner or destroys documents, is liable to prosecution.
37. Part 4 sets out the relevant personal and professional privilege protections which apply.

### **Assessing the evidence**

38. If the Commissioner’s investigation has uncovered material evidence that is at variance with the Member’s version of events, she will put this to the Member, who will have the chance to challenge it.



39. Before finalising her report, the Commissioner will share with the Member a draft of her findings of fact and provide the Member with an opportunity to comment. The Commissioner may also share with the complainant a draft of her findings of fact on a confidential basis, where the Commissioner considers it is appropriate in the circumstances to do so. All parties are provided 14 calendar days to make any challenges.
40. If, having considered the Member's comments, the Commissioner considers that there remain significant contested issues of fact, she will prepare her own account of the facts of the case, while drawing attention to those points which are contested.
41. The Commissioner reports their findings to the Greffier in the following form:
  - a. a summary of the initial complaint and of the relevant elements of the Code;
  - b. a brief account of the key facts in the case, with reference to evidence as appropriate, and with any contested points of fact highlighted;
  - c. their findings with reasons as to whether or not the Code has been breached and any relevant evidence, written and oral;
  - d. a recommendation as to what action, if any, should be taken.
42. The Commissioner shall report their findings to the Greffier for forwarding to the Policy & Finance Committee which will submit the report - with the Commissioner's recommendations - to the Presiding Officer for inclusion in the next Chief Pleas of Sark's meeting agenda for debate at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. The Commissioner will inform the complainant of the action taken in response to the complaint.

### **Right to appeal the decision of the Commissioner**

43. An appeal against a decision by the Commissioner can be made either by the complainant or the respondent to the Greffier who will allocate the appeal to one of the available Appeals Commissioners ("AC").
44. The role of the AC is to review the decisions taken by the Commissioner. The AC does not re-investigate the allegations during an appeal, nor does he/she take fresh decisions on the basis of the investigation.
45. To submit an appeal, it must be:
  - a. made in writing
  - b. submitted by the complainant or respondent, not by an adviser or supporter
  - c. submitted within 20 working days of being notified of the Commissioner's decision<sup>2</sup>
  - d. set out which of the below grounds apply
46. An appeal can be brought under one or more of the following grounds:

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<sup>2</sup> *The deadline may be extended if there are mitigating circumstances. A request for an extension should be done as early as possible and before the appeal deadline. Any request should clearly state the mitigating circumstances and, where appropriate, provide evidence of such circumstances. Any request for an extension to the deadline must be made by the complainant or respondent, not by an adviser or supporter, and there is no guarantee the extension will be approved.*

## APPENDIX TWO

- a. there was a material error in the relevant investigation by the Commissioner that affected the decision,
  - b. the decision was unreasonable,
  - c. the process followed by the Commissioner in reaching the decision was flawed,
  - d. credible new evidence has become available which, if accepted, would have a real prospect of affecting the decision,
  - e. in the case of a decision to impose a sanction, the sanction imposed was disproportionate, or
  - f. there is another compelling reason to allow an appeal to be made.
47. An appeal submission should include as much detail as necessary to consider the appeal and to understand the nature of the issues being raised.<sup>3</sup>
48. Where an appeal is wholly or partly on the grounds of credible fresh evidence, that evidence should be included in the appeal submission or by way of a summary.
49. The AC will:
  - a. consider whether the issues raised in the appeal fall within one or more of the grounds for appeal and whether there is any substance to the grounds;
  - b. consider whether to disclose an appeal submission to the other party. This will normally only be if the AC wishes to request further information from them or to ask them to respond to a specific point;
  - c. consider the substantive appeal and reach a conclusion on the merits. The AC may request additional evidence but will not conduct a re-hearing of the case.
50. The AC will normally decide the appeal based on written submissions. Exceptionally, the AC may decide that it should hold an oral hearing with one or both of the parties (separately), but only if there is a specific reason for doing so.
51. The AC will apply the civil standard of proof, the balance of probabilities, as applied by the Commissioner.
52. The AC will make a decision on the appeal and say whether or not the complaint has been upheld. Depending on the outcome, the AC may then need to go on to consider the question of sanction. The AC can uphold, reduce or increase the sanction. In cases where the complaint has not been upheld, no sanction will be imposed.
53. The AC will report their findings to the Greffier. The Greffier will notify the complainant and the Member and at the same time will send the report to Policy & Finance Committee for them to forward to the Chief Pleas of Sark. The AC's report will be handled in the same manner as a report from the Commissioner.
54. The AC may, exceptionally, require or recommend that the complaint is re-

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<sup>3</sup> The AC may or may not ask for more information. Insufficient supporting information in an appeal submission may reduce the likelihood that the AC will decide that there is any substance to the grounds raised.

investigated taking into account its decision.

55. The decision of the AC is final and cannot be appealed.

*28th August 2025*

*Dr Melissa McCullough  
Commissioner for Standards*

**AGRICULTURE, ENVIRONMENT & SEA FISHERIES  
COMMITTEE**

**Information Report to Christmas Chief Pleas, 21st January 2026**

**ANNUAL INFORMATION REPORT**

Each year the Committee submits a report to Chief Pleas outlining the significant events to have happened over the previous twelve months. Reports are submitted by the Committee members for their particular field. This year there are four reports, of which three are below and one is attached. Please see Appendix One for the Abbatoir Annual Report.

**Sea Fisheries**

Each year the people who have been granted licences to dive for scallops. are require to submit to the Committee the number of dives undertaken, the number of scallops taken on these dives and their total weight. The figures for 2025 are as follows:

Total dives	75
Total scallops	7643

The Committee retains the returned forms of what was caught where, and when, for any further analysis.

**Habitat Survey**

The 2024 Sark Habitat Survey and the associated report have been completed (See Appendix Two). The Survey updated the previous assessment of the island's habitats in 2013 and establishes a new baseline using the UKHab classification system. The most significant change identified since the 2013 Phase 1 habitat survey is an 215% increase in Semi-improved Grassland, reflecting positive management practices and reduced agricultural intensification. There has also been a 25% increase in Dense Scrub, this is largely a result of natural succession and often occurred at the expense of habitats of higher conservation importance, such as Coastal Grassland and Heathland. Thirty three UKHab habitat types were recorded, and habitats classified as High-distinctiveness habitats include Lowland Dry Acid Grassland, Lowland Heathland, Reedbeds, and Maritime Cliffs. Many are of national and international conservation importance, including species rich grasslands, maritime cliff and slope, and coastal heathlands, and are comparable to habitat types listed in Annex 1 under the EU Habitats Directive, or Priority habitats in the UK.

The survey also identified a number of invasive non-native species (INNS), including parrot's feather, Cape ivy, Japanese knotweed, and sour fig, posing ecological risks if unmanaged. The Report makes number of recommendations with the aim of protecting and enhancing the islands habitats, including:

- the expansion of efforts to prevent and reverse the succession of coastal habitats to Dense scrub, including targeted clearance and an expansion of conservation grazing
- to prioritise the eradication or control of invasive non-native species, and;
- The Continue sensitive land management practices, avoiding intensive fertiliser and pesticide use.

A repeat island-wide habitat survey has been recommended in 5–10 years' time in order to monitor trends and inform policy.

## **Asian Hornet Control**

### **Yellow-legged Asian Hornet Report 2025**

With spring winds ranging predominantly between the north and the south, we faced unprecedented waves of migrating queens from both France and Jersey. For the first time, queens were trapped in Little Sark. When trapping ceased in early June, 136 queens could be accounted for, significantly more than the previous year's record of 30 and the record of 24 from 2023. The proximity of Jersey and the severity of the hornet problem there is seriously impacting Sark.

A primary nest with a resident queen was found in mid-June, the first time we have located one on Sark and subsequently, three primaries were found from which the queen had already migrated across to the secondary nest. In every instance, the secondary nest was within 50 yards of the primary nest, so there is a value in finding primary nests, even if they are no longer being used.

Six secondary nests were tracked, located and destroyed. Tracking was hindered by nests being close to one another and by the fact that there was a long delay before the Guernsey AHT was able to come over to destroy the nests. This was because the qualified operative has taken on a new role in Guernsey States.

A very busy summer concluded with no further signs of hornets and particularly on any of the beehives spread island-wide from north to south or on any fatsia japonica blooms in October. We don't believe that every nest was located, but the absence of any further activity together with sightings of a honey buzzard by at least two reliable bird watchers, lends credibility to the theory that the possible two or three nests remaining, fell victim to a honey buzzard.

Fundraising by the Sark Asian Hornet team encouraged donations to purchase a radio transmitter tracker. Although it arrived too late to use in 2025, it will come into its own in 2026. The balance of funds remaining is sufficient to purchase a lance for nest destruction, providing us with more independence and enabling us to tackle the nests as they are found. Its use is dependent upon one of the Asian Hornet Team being

trained in the safe use of poisons – that is a half-day course that can be attended online.

With the total change of personnel in the Guernsey AHT and the tightening of funding, there is a requirement for Sark to be far more independent and less reliant on Guernsey. The Sark AHT has already made positive moves in this direction.

We go into 2026 confident that no large undiscovered hornet nests remained and therefore, that our spring queening programme in 2026 will be focussed on incoming queens. This will be a perennial problem for years to come and one that, uncontrolled, poses very serious environmental and public health risks.

Our thanks go to the Guernsey Asian Hornet Team of Francis Russell, Damian Harris and Nik Carré and our very best wishes to Francis in his retirement and Damian in his new role heading up Bailiwick Plant Health. Thanks also go to Ringo Brown, Andrew Prevel, Andy Cook, Nick Dewe, Owen Godwin, Flynn Martin, Kevin Adams, the HSBC and finally the people of Sark without whose stunning queen trapping results in the spring, this year would have been disastrous.

**Conseiller Helen Plummer**

**Chair, Agriculture, Environment & Sea Fisheries Committee**

# Sark Abattoir Annual Report 2025

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## Operational Report

Operational issues are as follows;

Pig scalding age – Scalding is failing due to leakage – it now requires extra care to fill at the correct temperature – Rowan (island mechanic has been engaged to quote for fix/repair.

Butchery hot water supply – John Robinson has engaged Karl Rang to quote for a change to the butchery water supply to use the main water cylinders to ensure domestic and high temperature water supply is available. To add a hose pipe to the utilities in the butchery and to adjust the drainage level on the butchery floor to ensure all water drains post cleaning in an efficient and sanitary way. Initial discussion requesting the quote was mid summer 2025. There has been no further progress.

Butchery drainage – Quotes to improve the current drainage in the butchery have been received and investigation into credit note from original floor installer are active. Preferably adjustments to the drain can be provided but if cost is prohibitive then the issue will need further consideration. This item remains outstanding since previous year report. No further progress to date.

Air extraction – A replacement window with built in ventilation has been installed in the butchery. We are yet to test for temperature management as installation was post summer - butchery temperature will be assessed during spring/summer 2026.

Laundry – quotes for washer has been purchased and installed. Process for on site laundry is found to be effective and manageable within normal operational hours.

General plumbing – maintenance contract has moved from Alan Blythe to Karl Rang. A list of items for fix/replace have been agreed but works have not as yet commenced.

Floor cleaning / sanitisation – Alan W is to investigate the staining and residue issue left on the floor after cleaning and rinsing. The floors are losing some of the green pigment due to cleaning but there also seems to be residual cleaning product following cleaning and air drying. The pigment is white and powdery but is proving difficult to remove. Alan to discuss with professional cleaning product provider.

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## Team Changes

- The ideal team size would include a Head Slaughter Man, 2 additional Slaughter Men and 2 Trainee Slaughter Men – with the aim to rotate the team on Slaughter days to allow each employee to manage their working week more effectively.
- Abattoir has engaged Cerys Knight as Trainee.
- Butchery Services – Contract butchers are engaged to work on behalf of meat producers. During 2025 Mark (Dog) has been the main provider and has shown his abilities as a professional butcher to be highly welcomed by our producers. Suggestion to engage Mark as an Island employed Butcher on a zero hours contract has been submitted.

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## 2025 Animals processed

This data will be included in 2025 treasurers report with supporting financial data.

Note – It is anticipated that the numbers of lamb will remain stable during 2026, but numbers of beef and pig will reduce due to reducing numbers of producers in Sark.



**ENVIRONMENT GUERNSEY LTD**


## **Report of the 2024 Sark Habitat Survey**



Completion date: December 2025



**Environment Guernsey**  
Environmental contracting & consulting



**Document title:** Report of the 2024 Sark Habitat Survey  
**Status:** Final  
**Date:** 14 December 2025  
**Author:** Julia Henney M.Sc MRSB  
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Cover image – Unimproved Grassland, G1a Lowland dry acid grassland

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## EXECUTIVE SUMMARY

The 2024 Sark Habitat Survey provides an updated assessment of the island's habitats following the previous survey in 2013 and establishes a new baseline using the UKHab classification system. The survey, conducted in May and August 2024, covered 471 hectares of terrestrial land and 74 hectares of intertidal zone, excluding built-up areas and small gardens. Data were collected using JNCC Phase 1 and UKHab methodologies, supported by high-resolution aerial imagery.

The most significant change identified since the 2013 Phase 1 habitat survey is a 215% increase in Semi-improved Grassland, reflecting positive management practices and reduced agricultural intensification. There has also been a 25% increase in Dense Scrub, this is largely a result of natural succession and often occurred at the expense of habitats of higher conservation importance, such as Coastal Grassland and Heathland.

33 UKHab habitat types were recorded, with Modified Grassland (396 ha) and Maritime Cliff and Slope (157 ha) being the most extensive. Several habitats classified as High-distinctiveness habitats include Lowland Dry Acid Grassland, Lowland Heathland, Reedbeds, and Maritime Cliffs.

The surveys identified a high diversity of habitat types, and many were of national and international conservation importance, including species rich grasslands, maritime cliff and slope, and coastal heathlands. Many are comparable to habitat types listed in Annex 1 under the EU Habitats Directive, or Priority habitats in the UK.

The survey also identified a number of invasive non-native species (INNS), including parrot's feather, Cape ivy, Japanese knotweed, and sour fig, posing ecological risks if unmanaged.

A number of recommendations have been made, with the aim of protect and enhance the islands habitats, including:

- the expansion of efforts to prevent and reverse the succession of coastal habitats to Dense scrub, including targeted clearance and an expansion of conservation grazing
- to prioritise the eradication or control of invasive non-native species, and;
- The Continue sensitive land management practices, avoiding intensive fertiliser and pesticide use.

A repeat island-wide habitat survey has been recommended in 5–10 years' time in order to monitor trends and inform policy.

## **1. INTRODUCTION**

### **1.1 BACKGROUND**

A habitat survey was undertaken of Sark in 2024 in order to provide an update to a survey undertaken in 2013 using JNCC Phase 1 methodology, and to produce a new baseline for future surveys using UKHabs methodology.

The Survey was conducted over two visits in May 2024 and August 2024. Sark (excluding Brecqhou) has a total area of 534 hectares, of which 471ha were surveyed. The intertidal zone surrounding the island covers 74ha, of which 74ha were surveyed. The terrestrial land surveyed included all natural and farmland areas and some large gardens however built-up areas, small gardens, tracks, etc were outside the scope of the surveys. The intertidal zone surveyed was based mostly on the mean high and low water marks obtained from the official States of Guernsey digital map, however it was amended where inaccuracies were visible on aerial photographs.

### **1.2 AIMS OF THE SURVEY**

In order to devise effective policy and planning decisions the knowledge of location, extent and distribution of species and habitats is essential. An island wide habitat survey is one of the most appropriate means of gathering this data; which can then be used to assess potential impacts of proposed developments, provide statistical support for the case for the conservation of areas and can be used in educating the public of the case for conservation.

The UKHabs classification system is quickly becoming the standard habitat survey classification system in the UK and is used during site assessments to inform Biodiversity Net Gain assessments which are now mandatory for most applications for development in England (Environment Act, 2021, ss.98–101). The capture of habitat data in UKHabs classifications will enable a critical analysis of the use of this methodology in Sark and provide a baseline from which future surveys may be measured, aligning Sark's assessment of habitats to the UKs.

### **1.3 SCOPE OF THIS REPORT**

This report describes the findings of the habitat survey conducted in 2024 and should be referenced to the ESRI shapefiles that contains all of the data gathered during the survey.

This report aims to provide some background to the habitats located during the survey and to discuss their current distribution with reference to historical data. In particular it will evaluate the changes over the past 11 years using the 2013 survey as a point of reference. It will also discuss some of the causes and implications of these changes.

This report has been produced with the intention of indicating and classifying the occurrence of semi-natural habitats, it is not to be regarded as a definitive representation of the conservation value or interest of any piece of land, which should be considered when interpreting the results (JNCC, 2010).

## **2. METHODS**

### **2.1 STANDARD METHODOLOGY**

The methodology used largely adheres to that described by the Joint Nature Conservation Committee (JNCC; 2010) with data being captured digitally in the field using Esri Field Apps on a Samsung Galaxy Active Tab.

Before undertaking field work, the most recent orthorectified aerial photograph (2022) was overlaid with the polygonal land parcel layer, both obtained from Digimap Ltd. This layer was then edited so that each obvious habitat feature observable on the aerial photograph was matched to one or more polygons in the shape file. These habitat parcels were classified directly in the field, using a drop-down list of the JNCC habitat classifications and a freehand box for UKHabs classifications. A third field was edited to obtain any secondary classification codes. Field notes were also collected using this system. Once the field work was completed, the data was 'cleaned' in the office and any notes or alterations to the parcels that had been observed in the field but were not immediately visible from the aerial photograph were made. For inaccessible areas, notes were made in the field for any visible vegetation types, but boundaries were mostly determined from the aerial photographs. Earlier aerial photos were often valuable: that taken in winter 1996 clearly distinguished scrub from Bracken and Coastal Grassland at that date, and the one taken in 2005 clearly picked out areas of gorse which were flowering at the time the picture was taken.

#### **FIELD METHODS**

Using the standard JNCC methodology, the scale of maps taken out into the field limits the minimum size of habitats that can be surveyed. When using a tablet this is no longer an issue and through use of FieldApps it was possible to zoom to a scale of 1:200 without losing too much clarity, thus allowing surveying in much greater detail.

The 'optimal season' for surveying is April-July, and most of the field work was undertaken in May 2024, with follow surveys undertaken in early August 2024. Although this is slightly outside optimum survey season, it was not felt that the accuracy of the field work was compromised.

Boundaries were not surveyed, however where interesting species were identified within boundaries, these were target noted.

### **2.2 PHASE 1 METHODOLOGY**

The habitats were classified according to those described by the JNCC (2010), with some variations (See Appendix 1).

Target notes were included where notable species or habitat features below the minimum mappable unit size were found.

### **2.3 UKHABS**

The habitats were classified according to those described by the UK Habitat Classification version 2.0 (UKHab Ltd, 2023). Classification in the field was aided with the use of the UK Habitat Classification Field Key (Carey and Butcher, undated).

Secondary codes were applied to habitats in line with the requirements (Essential Secondary Codes) and recommendations (Additional Secondary Codes) in the UK Habitat Classification version 2.

Descriptions of the UKHab Primary codes relevant to Sark are included in Appendix 2.

## **2.4 ENSURING ACCURACY**

The largest cause of error in Phase 1 habitat surveys is observer error when assigning a definition to a habitat unit (JNCC, 2010), which varies depending on a variety of factors, such as time of year, experience of the observer etc. As only one surveyor was used to survey the habitats, there will be no error between surveyors. However, for a survey to be fully replicable, it is essential that the habitats are classified to strict definitions, and so surveyors must be trained as thoroughly as possible. The surveyor in this case has experience undertaking Phase 1 habitat surveys across the Channel Islands, and has received formal training in the use of UKHabs classification methodology.

Aerial photographs were used alongside the field survey to increase the accuracy of the habitat classifications. The advantages were;

- More accurate divisions of the habitat parcels which reduces the boundary error, especially when mapping unbounded units
- They could be used to double check classifications
- They provided an overview of the area before surveying to highlight areas that might be missed from ground level, such as clearing in woodlands, or areas of broadleaved woodland within coniferous woodland, etc.
- It was also possible to use previous aerial photos to aid classification, for example, to see if an area of woodland was planted or semi-natural.
- They were also used to survey inaccessible areas, such as parts of the cliffs

The accuracy of using aerial photography is restricted by the quality of the image; the most recent image used in this study was taken in April 2022, and had a resolution of 10cm and so allowed a very high level of accuracy.

Access was restricted to some areas, mainly fields being actively grazed by horses and sections of the cliffs, particularly where these were very scrubby. In these areas most results were gained using aerial photos and from what was visible from public footpaths, as such the classification of these areas is not as accurate as where site visits were possible.

Although every effort was made to ensure accuracy, the results gained are not 100% accurate, and the following restrictions should be noted:

- The survey is based solely on vegetation; no faunal communities were studied.
- Significant habitat changes may have occurred since the maps were produced.
- The majority of sites were only visited once.
- No species lists were produced, so rarities may have been overlooked.



### 3. RESULTS

During the 2024 habitat survey 471ha of terrestrial and 74ha of intertidal land were surveyed. All habitats were assigned a Phase 1 habitat type (see section 3.1) and a UKHabs Primary code (see section 3.2). Additional target notes were also captured (see section 3.3).

During the 2013 habitat survey, 477ha of terrestrial and 67ha of intertidal land were surveyed.

GIS layers are available of both surveys and target notes, including photographic attachments. It is recommended that the following results are read in combination with viewing the mapped results.

#### 3.1 PHASE 1

A total of 30 Phase 1 habitat types have been located during this survey (see Table 1 below), this compared to 29 in the 2013 survey. Brownfield site was not classified during the present survey, however both Semi-improved Marshy Grassland and Swamp were classified in 2024 but not in 2013.

**Table 1.** The Phase 1 classification, count and total area (in hectares) of habitats identified in 2024.

JNCC Phase 1 habitat classification	Count	Area (ha)
Semi Natural Broadleaved Woodland	71	43.51
Planted Broadleaved Woodland	27	6.72
Planted Coniferous Woodland	8	0.57
Planted Mixed Woodland	12	1.96
Plantation Woodland	15	4.96
Parkland	10	2.65
Dense Scrub	386	128.72
Unimproved Grassland	1	1.42
Semi-improved Grassland	60	34.80
Improved Grassland	213	133.72
Semi-improved Marshy Grassland	2	0.30
Continuous Bracken	90	14.06
Tall Ruderal	18	3.47
Swamp	1	0.08
Standing Water	6	0.24
Intertidal Sand	15	6.39
Intertidal Shingle	49	5.63
Intertidal Rock and Boulders	505	62.33
Shingle	3	0.05
Rock	282	12.03
Hard Cliff	172	22.24
Soft Cliff	39	1.34
Coastal Grassland	349	31.26
Coastal Heathland	84	8.21
Quarry	2	0.15
Arable Land	16	5.98
Arable Land short term ley	3	2.77
Amenity Grassland	47	9.63
Bare Ground	13	0.37
Sand / Mud	1	(41m <sup>2</sup> )

As the methodology has remained consistent between the two surveys it is possible to undertake a direct comparison of the habitats identified and how their distribution and abundance has changed since 2013. These figures are detailed in table 2 below.

**Table 2** Changes in amount of land classified by Phase 1 from 2013 to 2024 habitat surveys, in area (hectares) and percentage change

Phase1	Area (ha) 2013	Area (ha) 2024	Change	
			Area (ha)	Percentage
Semi Natural Broadleaved Woodland	44.29	43.51	- 0.77	-2%
Planted Broadleaved Woodland	3.37	6.72	3.34	99%
Planted Coniferous Woodland	0.55	0.57	0.02	4%
Planted Mixed Woodland	2.35	1.96	- 0.38	-16%
Plantation Woodland	25.03	4.96	- 20.07	-80%
Parkland	2.00	2.65	0.64	32%
Dense Scrub	102.69	128.69	26.01	25%
Unimproved Grassland	0.89	1.42	0.53	59%
Semi-improved Grassland	11.05	34.80	23.75	215%
Improved Grassland	128.56	133.72	5.15	4%
Semi-improved Marshy Grassland	-	0.30	0.30	N/A
Continuous Bracken	44.23	14.06	- 30.17	-68%
Tall Ruderal	1.51	3.47	1.96	130%
Swamp	-	0.08	0.08	N/A
Standing Water	0.25	0.24	- 0.00	-1%
Intertidal Sand	3.80	6.52	2.72	72%
Intertidal Shingle	2.80	5.49	2.70	96%
Intertidal Rock and Boulders	60.63	62.33	1.70	3%
Shingle	0.16	0.05	- 0.11	-67%
Rock	9.93	12.03	2.10	21%
Hard Cliff	26.74	22.24	- 4.50	-17%
Soft Cliff	0.77	1.34	0.57	74%
Coastal Grassland	22.72	31.26	8.54	38%
Coastal Heathland	5.21	8.21	3.00	58%
Quarry	0.31	0.15	- 0.16	-50%
Arable Land	12.85	5.98	- 6.87	-53%
Arable Land short term ley	15.74	2.77	- 12.97	-82%
Amenity Grassland	9.41	9.63	0.22	2%
Bare Ground	2.26	0.37	- 1.88	-84%
Sand / Mud	3.61	(41m <sup>2</sup> )	- 3.61	-100%
Brownfield	0.17	-	- 0.17	-100%

In order to provide an indication of the relative importance of each habitat type, a note is provided if they are also considered a Priority Habitat or Habitat of Conservation Importance in Guernsey (see appendices 3 and 4), a UK Biodiversity Action Plan habitat (see appendix 5) or if they meet the definition of habitats included in Annex 1 of the Habitats Directive (see appendix 7). A summary table of these classifications of 'conservation importance' is included in Table 4: A summary of the conservation value of Phase 1 habitat types recorded in Sark in 2024. This includes habitats which are considered a Priority Habitat or Habitat of Conservation Importance in Guernsey, those which may be

akin to those classified as a UK Biodiversity Action Plan priority habitat, and if they may meet the definition of habitats included in Annex 1 of the Habitats Directive. on page 38.

## Woodland

Six different classifications of woodland habitat were identified in Sark during both the 2013 and 2024 surveys. They include semi-natural and planted woodlands, comprising both broadleaved and coniferous woodlands.

Boundaries were not included in this survey, so trees which grow as standards in hedgerows or on the banks of fields have not been included in this statistic. Hedgerows are known to be important landscape features to enable connectivity between natural habitats and support a diversity of wildlife in their own right.

### *Semi-natural Broadleaved Woodland*

Semi-natural Broadleaved Woodland is the most abundant woodland type found in Sark, and one of the most abundant habitats across its terrestrial area, covering 9% of the islands 'greenspace'<sup>1</sup>. It is spread throughout the island, but is most abundant on the east coast and through the wooded valleys. The largest continuous expanses can be found at Dixcart valley and along the cotils north of Greve de la Ville.

Like other Channel Islands, Sark has undergone significant periods of deforestation, although unlike Guernsey, it has retained large swathes of woodland comprised of native species. Sycamore (*Acer pseudoplatanus*), however, is a dominant species across the island. It is widely accepted to be a non-native species, and readily establishes in clearings and unmanaged land, often at the expense of native species, such as oak and ash, which are slower growing. Sycamore trees leaf out earlier in the spring than oak (*Quercus* sp.) and ash (*Fraxinus excelsior*) and may reduce the diversity of the ground flora, which rely on light levels in the early spring for their flowers to be pollinated and set seed.

There are still areas of woodland dominated by pedunculate oak (*Q. robur*) and ash, although there are signs of ash dieback in some young trees (see Figure 1).

The area of Semi-natural Broadleaved Woodland has remained largely consistent since the 2013 survey, there has been a 2% decline in abundance which is mostly due to the minor changes in mapping, for example, where small areas of scrub have been identified and separated out from large expanses of woodland.

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<sup>1</sup> Proportion of 'greenspace' is the percentage of all the terrestrial land surveyed, 471ha (this does not include intertidal habitats).





**Figure 1;** Semi-natural Broadleaved Woodland above Dixcart Bay.

Semi-natural Broadleaved Woodland is considered both a Habitat of Conservation Importance and a Priority Habitat in Guernsey, which reflects both its ecological value and its vulnerability from losses (i.e., through land clearance).

Some sites, especially areas of mature oak and ash woodland, may also be similar to the UK Bap Priority Habitat – Lowland Deciduous Woodland.

#### *Planted Broadleaved Woodland*

There are few very large expanses of Planted Broadleaved Woodland, and where they're found they are mostly in the extended curtilage of large properties, such as La Seigneurie. In total, 6.7ha was identified in the 2024 survey, which is double that identified in 2013, in which 3.4ha were classified. There does not appear to have been significant new plantings, but rather small changes in classification between different woodland classifications, such as a change from Parkland to Planted Broadleaved Woodland, possibly due to the closing of canopies as planted trees mature.

Planted Broadleaved Woodland is considered a Habitat of Conservation Importance in Guernsey. Although it will vary considerably in its ecological value depending on the species planted and its management. Some areas may be planted for amenity and, if intensively managed, it may lack a diverse understorey which reduces its value. Likewise, if non-native species of tree are selected they are likely to support less associated biodiversity than native tree species. Mature trees should be retained where possible, however the value of Planted Broadleaved Woodlands can often be enhanced by considering interplanting, or replacing any felled trees with native species, and ensuring management of the ground storey is not intensive. The Woodland Trust provides resources offering more specific advice on woodland management.

#### *Planted Coniferous Woodland*

The area of Planted Coniferous Woodland has remained stable between the 2013 and 2024 surveys, with 0.55ha and 0.57ha classified respectively. The small increase in the 2024 survey is most likely due to small changes in mapping boundaries in woodland.

There are no species of conifer considered native to the Channel Islands, however Monterey pine (*Pinus radiata*) is commonly planted because it is highly tolerant to the coastal and exposed conditions found here. Coniferous trees reduce the light available to ground storey and their needles often increase the acidity of the soil, significantly limiting the species which are able to survive beneath them. Despite that, they are known to be valuable for fungi and certain breeding birds and bats, such as long-eared owl (*Asio otus*) and Planted Coniferous Woodland is considered a Habitat of Conservation Importance in Guernsey.

#### *Planted Mixed Woodland*

Planted mixed woodland will comprise of at least 10% of both conifers and broadleaved trees, and as such the ecological value of these habitats has largely been described in the preceding categories.

There has been a small decrease in the amount of Planted Mixed Woodland identified from 2013 to 2024, which reduced from 2.35ha to 1.96ha. This is largely due to reclassifications to other woodland types (Planted Broadleaved, Parkland or Semi-Natural Broadleaved Woodland), rather than a loss of woodland cover.

As with the preceding categories, the ecological value of these woodlands will vary considerably depending on the species planted and management, however Planted Coniferous Woodland is considered a Habitat of Conservation Importance in Guernsey.

#### *Plantation Woodland*

Plantation woodland in Sark comprises of orchards and woodlands as there are no large plantation woodlands for timber or biofuel, for example.

In 2013 25ha of Plantation Woodland were identified, which reduced by 80% to 4.96ha in 2024. This is due to the removal of the extensive vineyards that were previously planted across the island. These former vineyards are almost entirely now classified as Improved Grassland.

The Plantation Woodland identified in 2024 includes a number of fields with abandoned grapevines which are rapidly succeeding to scrub and secondary woodland (see Figure 2), and areas of planted orchards. These orchards range from fairly intensively managed sites with closely mown improved grassland beneath, to planted fruit trees in low numbers, which appear to be less extensively managed and support species-rich grasslands beneath the trees (Figure 3).

Plantation Woodland is not a habitat prioritised for conservation in Guernsey, however in the UK, Traditional Orchards are classified as a UK BAP Priority Habitat due to the diversity of species which they can support, and often supporting rare or nationally important species. They may also contain other habitats of conservation importance (e.g., species-rich grasslands). Those mature orchards which are managed without the use of pesticides or fertilisers may meet this definition and so would be of national importance.





**Figure 2.** Example of land formally classified as Plantation Woodland – a former vineyard which does not appear managed and has succeeded to Dense Scrub.



**Figure 3.** Example of a Plantation Woodland – an orchard with Semi-improved Grassland beneath trees.



### **Parkland**

Parkland is comprised of intensively managed grassland with scattered trees. It is akin to the planted woodland categories described above, but is generally managed for amenity purposes and the density of trees means there is not a continuous woodland canopy.

2ha of Parkland were classified in 2013, and this has increased slightly to 2.65 in 2024. The distribution of land classified as Parkland has mostly remained consistent across the two surveys - one site has been reclassified as Planted Broadleaved Woodland (potentially due to the maturation of the trees and closing of the canopy), and other areas have been classified as Parkland that were not surveyed in 2013.

### **Scrub**

Dense scrub is one of the most abundant habitat types classified in Sark, covering 27% of the islands 'greenspace'. It is especially abundant around the island's coast, where lack of management and absence of grazers allows bramble (*Rubus fruticosus* agg.), gorse (*Ulex europeaus*) and blackthorn (*Prunus spinosa*) to establish and become dominant (see Figure 4).

There has been a 25% increase in the area of land classified as Dense Scrub between 2013 and 2024. Whilst some of this may be due to changes in mapping and improvements in identifying areas of dense scrub from amongst stands of woodland, by interrogating aerial photographs it is evident that there has been an increase of scrub around the cliffs, and often at the expense of habitats of higher conservation importance, such as Coastal Heathland and Coastal Grassland.

This is a trend which has been identified through habitat surveys of other islands in the Bailiwick, and the introduction of grazing by domestic animals is considered to be the most appropriate management intervention to reverse this trend. Grazing by livestock such as goats would enable the clearance of areas of scrub in an un-uniform manner, and can be carefully managed to ensure it doesn't result in the wholesale loss of scrub from large areas.



**Figure 4;** Image of a cliff side above Dixcart Bay which is dominated by Dense Scrub

### Dry Grasslands

Three different classifications of dry grassland habitat were identified in Sark during both the 2013 and 2024 surveys. The different classifications of grassland were identified, based on the diversity of herb present in the sward, they are Improved, Semi-improved and Unimproved. As a habitat group, Dry grasslands are the most dominant in Sark, with Improved Grassland being the most dominant, and accounting for 28% of the islands 'greenspace'. Semi-improved and Unimproved Grasslands are much more scarce, with only 34ha and 1.42ha respectively.

Both Unimproved and Semi-improved Dry Grasslands are Habitats of Conservation Importance and Priority Habitats in Guernsey, which reflects their ecological value, their vulnerability, and the decline in area both historically and since 1999.

Certain examples on Sark may also be akin to the UK BAP Priority Habitats – lowland meadows or lowland dry acid grassland, reflecting the national importance of these habitat types. Lowland hay meadows are also listed on Annex 1 of the EU Habitats Directive. Annex 1 habitats are those that are considered to be of European interest and require conservation measures to maintain or restore their favourable conservation status.

#### *Unimproved dry grassland*

Unimproved dry grassland is one of the most scarce habitats across the Channel Islands and is vulnerable to agricultural improvement or lack of management. One field in Sark was identified as Unimproved in both the 2013 and the 2024 habitat surveys. In 2013, a section of the field was classified as Semi-improved grassland as it had a notably lower species richness than the rest, however in 2024 this had sufficient diversity to be classified as Unimproved, as a result, there has been a 59% increase in this habitat type.

The field, depicted on the cover of this report and in Figure 5 below, is grazed by horses but it does not appear to be treated with fertilisers or pesticides and so is able to support a very high diversity of native plants, including birds foot (*Ornithopus perpusillus*), early forget-me-not (*Myosotis ramosissima*) and oxeye daisy (*Leucanthemum vulgare*).





**Figure 5;** unimproved grassland sward containing a species diversity of greater than 15 species per m<sup>2</sup>.

#### *Semi-improved dry grassland*

35ha of Semi-improved Grassland were identified in Sark during the 2024 survey. This is a more than a three-fold increase from the 11ha identified in 2013.

Of the 25 areas identified in 2013, 9 sites changed classification in 2024. The largest changes are; 3ha which have been reclassified as Coastal Grassland, 1.3ha which have been reclassified as Improved Grassland (possibly as a result of agricultural improvement), 0.68ha which has been planted with fruit trees and reclassified as Plantation Woodland, and 0.54ha which has been reclassified as Unimproved Grassland (as described above). Notably, only three sites (totalling 0.35ha) have been reclassified as Dense Scrub following a cessation of management.

The increase in Semi-improved Grassland is largely due to reclassification of sites from Improved Grassland, which, in turn, is likely due to increased floral diversity resulting from sensitive management practices.

One area was classified as Arable Land in 2013 and planted as a vineyard, and had recovered to an acid Semi-improved Grassland by 2024, demonstrating the value of restoring disturbed soils and managing land sensitively (see Figure 6).

Some areas appear to have changed classification without a notable change in management, for example, four sites (totalling 1.4ha) have changed from Amenity Grassland in 2013. This change may reflect an increase in diversity, however it is also possible that at the time of surveying in 2013, the grassland was too short or recently mown. Despite the potential for some changes to be due to such observation differences, there has still been a marked increase in this habitat type.

The increase in Semi-improved Grassland in Sark is a stark contrast to other jurisdictions where species-rich grasslands are being lost to intensive management, development, or abandonment. In Guernsey, for example, Semi-improved Grasslands declined by 90% from 1999 to 2018 (Hayward and Scopes, 2019).





**Figure 6;** an area of grassland which was classified as Arable in 2013 and, due to sensitive management, had been restored to a Semi-improved Grassland.

#### *Improved dry-grassland*

Improved dry Grassland is the most abundant habitat type in Sark, covering 28% of the islands 'greenspace' and spread across the plateau. It is absent only from the steep coastal areas. There has been a small increase in improved Grassland classified from 2013 (129ha) to 2024 (134ha).

The areas of land classified as Improved Grassland has remained relatively stable since 2013, the most notable change being 18ha of land which was previously classified as Plantation Woodland as it was planted with vineyards. These vineyards have subsequently been removed and these sites have been converted to grassland.

Some land previously classified as Improved Grassland has been reclassified as Semi-improved Grassland, as described in the earlier section, and another swathe on Little Sark as Coastal Grassland (see relevant section below). Other notable changes are the planting of three areas of Improved Grassland with fruit trees which have been classified as Plantation Woodland in 2024, and two fields which have been cultivated and are classified as Arable Short-term Ley.

#### **Marshy Grasslands**

Marshy Grasslands occupy land that is water logged or frequently flooded with freshwater. Due to Sark's topography and absence of grassed wet valleys, this is a scarce habitat type and is only present as a distinct habitat in two locations.

#### *Semi-improved Marshy Grassland*

Both fields identified as Marshy were classified as Semi-improved Marshy Grassland and were dominated by rushes (*Juncus* spp., such as toad rush (*J. bufonius*) and sharp-flowered rush (*J. acutiflorus*) and jointed rush (*J. articulatus*); see Figure 7). In 2013 both sites were classified as Improved Grassland with a target note describing marshy patches and the presence of rushes.



However the marshy areas were not separated out from the surrounding dry grassland, perhaps because the grassland was not sufficiently diverse or the rushes were not sufficiently dominant to warrant a classification as semi-improved.

Semi-improved Marshy Grassland is considered a Habitat of Conservation Importance in Guernsey.



**Figure 7(a and b);** photographs of areas classified as Semi-improved Marshy Grassland.

## Tall herb and fern

### *Continuous Bracken*

Areas of land which are dominated by bracken (*Pteridium aquilinum*) generally have a low floristic diversity due to the shading caused by the fronds and thick leaf litter that can accumulate. However, where the bracken is not too dense, or where spring flowers are able to persist, there may be a species-rich floral layer too.

This habitat is mostly present at the margins of the agricultural land on the plateau and the Dense Scrub around the cliffs, and between the Dense Scrub and the Hard Cliff, where soil is often too shallow for larger shrubs to establish.

In 2024, 14ha of Continuous Bracken habitat was identified. This is a decrease of 68% from the 44ha identified in 2013.

The land classified as Continuous Bracken in 2024 was mostly also classified as Continuous Bracken in 2013, with the notable exception of a site on Little Sark (roughly 1ha in size) which was previously classified as Semi-improved Grassland (with scattered bracken) and, possibly due to insufficient management (e.g., too little grazing) has become dominated by bracken.

A large proportion of the land previously classified as Continuous Bracken has since succeeded to Dense Scrub (as described in the Dense Scrub section above). However there have been some areas which have since been classified as a habitat type of a higher conservation value. For example, a series of fields between Beau Regard and the Gouliot Headland have been reclassified to Coastal Grassland. Although scattered bracken was noted in these fields, it appears that management has increased to a level which has reduced the dominance of bracken and allowed a more diverse grassland to establish (see Figure 8).

In addition, approximately 2ha have changed classification to Coastal Heathland (see Coastal heathland section below).





**Figure 8;** an area of grassland which has changed classification from Continuous Bracken in 2013 to Coastal Grassland in 2024 (as pictured). A diversity of wildflowers was noted, including lady's bedstraw (*Galium verum*), sheep's sorrel (*Rumex acetosella*), tormentil (*Potentilla erecta*) and English bluebell (*Hyacinthoides non-scripta*).

#### **Tall Ruderal**

Tall Ruderal is often a transitory habitat, characterised by tall stands of vigorous species which may quickly transition to later seral stages, such as Continuous Bracken or Dense Scrub. It is often dominated by perennial or biennial species such as nettles (*Urtica dioica*), thistles (*Cirsium* spp.) and docks (*Rumex* spp.). Stands in Sark were also often dominated by fennel (*Foeniculum vulgare*) and wild carrot (*Daucus carota*). With a small increase in management (e.g., cutting or grazing), it is often possible to quickly revert it to a grassland habitat.

Tall Ruderal is not an abundant habitat in Sark, although its abundance has increased from 1.5ha in 2013 to 3.5ha in 2024. Very little of the habitat classified in 2024 was also classified as such in 2013, and vice versa.

Most land classified as Tall Ruderal in 2013 has now succeeded to Dense Scrub or been cleared and reclassified as Improved Grassland.

Of the land classified as Tall Ruderal in 2024, the most notable change is of two sites (9.4ha) which were previously planted as vineyards and have since been cleared and tall plants have established (see Figure 9).





**Figure 9;** Tall Ruderal which was formally planted as a vineyard.

## Swamp, Marginal and Inundation

### *Swamp*

In Sark, only one area of swamp was identified. This site, of only 0.19ha, is dominated by reeds (*Phragmites australis*) and appears to be a waste treatment plant. Reeds can grow even in sites which are infrequently wet, as in this case. Due to its use, lack of standing water, and small size, it is not likely to be of equivalent ecological value as true reed beds.

Swamp is considered a Habitat of Conservation Importance and a Priority Habitat in Guernsey, Reedbeds are also a UK BAP Priority Habitat, demonstrating the local and national value of reedbeds, however as the site identified in Sark is not likely to support the same associated species as a true reedbed, it is not likely to be of the same value.

### **Open water**

#### *Standing Water*

Six areas of Standing Water were identified across five sites in both 2013 and 2024. There is only a very small difference in the amount of Standing Water classified (27m<sup>2</sup>) which is due only to small changes in the mapping of the boundaries.

Four of the five sites were ponds, and one site, just inland from Derrible Bay was a seasonally wet site, possibly a former quarry.

One pond, to the east of Rue de la Coupee, appears to be dominated by an Invasive non-native species. It was not possible to access the pond to determine the species, however it appears to be parrot's feather (*Myriophyllum aquaticum*; see Figure 10), which has been recorded from the vicinity in 2012. This is the only record of parrot's feather in the GBRC database, and, although it is not likely to be possible to eradicate, it should not be allowed to spread to other water bodies in the island. RAPID



(Reducing and Preventing Invasive Alien Species Dispersal) have produced a good practice guide for the management of parrot's feather<sup>2</sup>.



**Figure 10;** Pond dominated by a single species, likely to be parrot's feather, an invasive non-native species.

Standing Water is considered both a Habitat of Conservation Importance and a Priority Habitat in Guernsey, which reflects both its ecological value and its vulnerability from loss (i.e., drainage) or degradation (i.e., pollution or INNS).

Some sites may also be similar to the UK Bap Priority Habitat – Pond (JNCC, 2011).

## Coastland

### *Intertidal*

The Phase 1 classification subdivides the intertidal zone into only three broad habitat types; sand, shingle and rock. These classifications tell us little about the conservation value of different areas of the intertidal zone, but they do give an indication of the type of substrate that some habitats of conservation importance may be associated with.

In total, 74ha of intertidal zone was assigned to one of these three classifications. To the inaccessible nature of most of Sark's coastline, this was mostly undertaken by interpreting aerial photographs.

### *Intertidal Sand*

Where conditions allow, Intertidal Sand has the potential to support important species such as eelgrass (*Zostera* spp.), which forms habitats of high conservation importance.

Due to the topology of Sark, there are few sandy beaches, with approximately six of any substantial size. The largest ones being Le Grande Grève, Dixcart By, Derrible Bay and Port Es Sées. In total, 6.4ha of Intertidal Sand was classified in 2024, an increase from 3.8ha in 2013. This is due in part due to small changes in sand accretions, but mostly due to reclassifications of areas previously misclassified as

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<sup>2</sup> [www.nonnativespecies.org/assets/Good\\_Practice\\_Management\\_-\\_Parrots\\_feather\\_v3.pdf](http://www.nonnativespecies.org/assets/Good_Practice_Management_-_Parrots_feather_v3.pdf)

Sand/mud habitat and is therefore mostly a result of drafting errors rather than a measured increase in Intertidal Sand.

#### Intertidal Shingle

Intertidal shingle is a highly mobile habitat that is difficult for all but highly specialised species to survive in. It can be found in small accumulations all around the coast of Sark and Little Sark, most commonly on the upper shore in bays where the surrounding rocks and cliffs offer some protection from tides and storms.

In total, 5.6ha of Intertidal Shingle were classified in 2024, an increase from 2.8ha in 2013. Through interpretation of aerial photographs, it does appear that there has been some accretion of shingle in bays, which may be due, in part, to the different times of year that the photographs were taken; the 2012 imagery was obtained in September of that year, whilst the 2022 imagery was taken in April.

#### Intertidal Rock and Boulders

The vast majority of Sark's intertidal zone is classified as Intertidal Rocks and Boulders. 62ha was classified in 2024, which includes offshore rocks and islets. There has been a small increase in the amount classified since 2013 of 61ha, which is due to the inclusion of additional offshore islets not surveyed in 2013.

In the Channel Islands, Intertidal Rocks and Boulders support an abundance of seaweeds and associated fauna. The species assemblages present depend largely on depth and exposure to tides and many such assemblages are of high conservation importance.

#### Sand / Mud

Sand/mud habitat was identified at only one location in 2024. This is an area of sand above the high-tide mark at Dixcart bay, totalling 41m<sup>2</sup>. In 2013, six locations were classified as Sand/mud, however these have since been reclassified as Intertidal Sand as they are below the low tide mark. Therefore the marked reduction in this habitat is likely due to previous drafting errors rather than any real loss of this habitat.

Barren sand is a highly mobile habitat, often supporting very few plants, although where conditions allow it may become established with specialists such as marram grass (*Ammophila arenaria*) and couch grasses (*Elymus* spp.).

#### Shingle

As described above, shingle is a highly mobile habitat that supports only specialist species of fauna and flora. Above the high tide mark it has a greater opportunity to stabilise, although it is still exposed to large storms and sea spray. Here species such as yellow horned-poppy (*Glaucium flavum*), sea kale (*Crambe maritima*) and the international threatened scaly cricket (*Pseudomogoplistes vincentae*) can be found. When they are sufficiently stabilised to allow plants to establish, they are referred to as vegetated shingle banks.

Only three areas of shingle (above the high tide mark) were identified in the 2024 survey, amounting to 0.05ha, making it one of the scarcest habitats in Sark. None of these sites had become sufficiently established to be considered vegetated shingle banks.

In 2013, 0.16ha of shingle were identified across six sites. As with Sand/Mud classification above, most of this change is due to the reclassification of two areas to Intertidal Shingle as they are below the high tide mark. The 2022 aerial photography has provided clearer images, especially of the bays on the east coast, and so some areas have been more accurately mapped.

#### Rock

Rock habitats are not necessarily part of the cliff structure, and can be found inland, however in Sark all Rock classified was located around the coast. Rock, whilst appearing barren, can support a large diversity of specialist species such as lichens, and plants which can establish in small accumulations of organic matter in cracks or ledges.



In 2024, 12ha of Rock were classified, this is a moderate increase from 9.9ha classified in 2013. The increase appears mostly due to changes in classification of Rock to Hard Cliff, a very similar habitat type (see relevant section below). The distinction between Rock and Hard Cliff relates to the degree of slope, a factor which is difficult to interpret from aerial photographs and which is easily influenced by the degree of shade in the images.

Rock habitats are a Priority Habitat in Guernsey, although this is largely because of the inclusion of Inland Rock Outcrop and Scree Habitats in the UK BAP Priority Habitats list however none of the Rock identified in Sark comprised of inland rock outcrops.

#### *Maritime Cliff and Slope*

Sark's coastline is steep and rugged, and dominated almost entirely by Maritime Cliff and Slope habitats. There are four habitat types within the classification group, all of which are considered Habitats of Conservation Importance and a Priority Habitats in Guernsey. Maritime Cliff and Slope is also a UK BAP Priority Habitat and are akin to the EU Habitats Directive Annex 1 habitat type Vegetated Sea Cliffs of the Atlantic and Baltic coast. Annex 1 habitats are those that are considered to be of European interest and require conservation measures to maintain or restore their favourable conservation status.

The following four habitat classifications are therefore of local, national and international importance.

#### Hard Cliff

Hard Cliff is a common habitat type all around the coast of Sark, found to the seaward side of the cotils and falling down towards the sea. It is a very stable habitat type, taking many decades to change through either erosion or gradual vegetation with a build up of organic matter.

By its very definition, it will be poorly vegetated, but it is nevertheless an important habitat type, often supporting colonies of breeding seabirds such as fulmar (*Fulmarus glacialis*) and gulls (*Larus* spp.).

There has been a small decrease in the amount of Hard Cliff from 27ha in 2013 to 22ha in 2024. As described in 'Rock' classification above, this is likely due to changes in surveyor opinion rather than a change in the underlying geology. Other 'losses' are due to the more accurate identification of Soft Cliff and Coastal Heathland enabled by high resolution aerial photography, these are described in further detail in the relevant sections below.

#### Soft Cliff

As with Hard Cliff, Soft Cliff is also naturally poorly vegetated, although due to the more fragile nature of the substrate, it is faster to establish with vegetation and to be created following erosion of vegetated cliffs.

It is not an abundant habitat in Sark, which is mostly comprised of hard granite geology, however areas of Soft Cliff can be found in small areas all around the coast. The most notable areas are at Le Coupee and Port Es Sées.

There has been an increase of Soft Cliff identified from the 2013 survey (0.77ha) to the 2024 survey, in which 1.3ha were classified. In 2013, only two sites of Soft Cliff were identified, the largest being 0.70ha at Port Es Sees. By 2024, this site had largely been established with vegetation, including European gorse (*Ulex europaeus*). Whilst areas of Soft Cliff still persist here, it has reduced to 0.15ha in size. Additional Soft Cliff has been identified in 2024, all around the coast of Sark. This is in large part due to the availability of higher resolution aerial photography, however some areas of Soft Cliff have also been 'created' since 2013 due to erosion and loss of vegetation.

#### Coastal Grassland

Coastal grasslands are one of the most diverse grasslands found in the Channel Islands, especially those found on thin, nutrient-poor soils, or where there is sufficient management to maintain a short turf. Where management is limited, it can quickly become dominated by red fescue (*Festuca rubra*), often at the expense of the delicate floral species which are quickly outcompeted. Whilst these areas will

have lower floristic diversity, they can be very important for a wide range of other associated fauna, such as crickets and grasshoppers.

The amount of Coastal Grassland has increased from 23ha in 2013, to 31ha in 2024. The areas classified as Coastal Grassland have remained largely stable and are most dominant around the top of the cliffs. There have been some notable changes since 2013, for example, four fields in Little Sark which were previously classified as Improved or Semi-improved Dry Grassland were classified as Coastal Grassland in 2024. And a series of fields at Gouliot Headland were classified as Continuous Bracken in 2013. These changes are likely due to improvements in management, which have allowed the coastal grassland indicator species to flourish.

Some of the increase measured since 2013 will also be due to more accurate identification of grassland areas around the inaccessible cliffs, which has been enabled by the availability of much clearer aerial photography.

In contrast to those increases, however, some areas of Coastal Grassland have been lost since 2013, largely in areas which have become established with scrubby species and so reclassified as Dense Scrub (see Dense Scrub section above). The introduction of goats to graze at L'Eperquerie Common is one management tool which will help reverse this trend, and consideration should be given to expanding this grazing to other areas where practicable.

#### Coastal Heathland

The amount of Coastal Heathland classified in Sark has increased from 5.2ha in 2013 to 8.2ha in 2024. This is, however, largely due to the availability of aerial photographs of greater clarity which have allowed new areas of heathland to be identified. New patches have been identified around the coast of Sark and Little Sark, but appear to be especially frequent on the eastern side of La Coupee. These sites may have become heathland since the 2013 survey (i.e., heather species have grown there in the last 10 years), however it is more likely that they were present in 2013 but were not visibly distinct on the aerial photograph from the adjacent habitats.

Of the areas of Coastal Heathland identified in 2013, many of them have been totally or partially classified as Dense Scrub in 2024, due to the development of scrub species as part of the natural successional process. As described in the Dense Scrub section above, this is a trend which has been evidenced in other Channel Islands and results from a reduction in management such as grazing. Coastal Heathland is a habitat of higher conservation value than Dense Scrub, and so this succession should be halted where management allows.

Two large areas of Coastal Heathland have been classified on land which was classified as Continuous Bracken in 2013. This suggests that management has increased sufficiently to reduce bracken cover to the benefit of the heather species. The 2022 aerial photograph appears to show evidence of mowing on both sites which, when timed correctly, can reduce the dominance of bracken, and this appears to be a successful method in these locations.

#### Quarry

##### *Quarry*

Due to high levels of disturbance, Quarry habitats often support limited associated species, although in some occasions may provide ideal breeding ledges for certain birds of prey. The Quarries identified in Sark are all small in scale and not sufficiently deep to support breeding raptors. However this small scale may mean they contribute to the local ecology in part of a wider mosaic of habitats. Providing, for example, bare ground for dust baths for birds or nesting sites for solitary bees.

The amount of area classified as Quarry has declined by more than half since the 2013 survey, which identified 3.1ha, to 0.15ha in 2024. In 2024, two sites were identified as quarry, both of which were also classified as Quarry in 2013. One site, to the east of Happy Valley reduced by 67% (from 0.16ha)



due to the establishment of grassland and gorse and, despite historic disturbance, it was noted as being very species-rich (see Figure 11).



**Figure 11;** An area of Quarry which, despite historic disturbance was noted as being species-rich.

## Cultivated and Disturbed Land

### *Arable Land*

The amount of land classified as Arable in Sark has declined from 12.85ha in 2013 to 5.98ha in 2024.

In most examples, this is due to reclassification as either Arable Short-term Ley or Improved Grassland, which may be as part of a rotational system in which land is either cultivated for crops, or rotated to be resown with high-yield grass species.

One notable exception to this is restoration of a former arable field to Semi-improved dry grassland; a habitat of much higher conservation importance.

Almost all of the land classified as Arable in 2024 survey was classified as either arable or Arable Short-term Ley in 2013, which suggests that the loss of permanent grasslands to cultivation is not extensive.

The land which has been under constant cultivation includes three fields which are growing asparagus.

### *Arable Land short-term ley*

There has been an even greater declines in Arable Short-term Ley having been identified during the 2024 survey, compared to 2013 (from 15.74ha to 2.77ha).

As with Arable Land above, some fields have been reclassified as Arable Land (i.e., they are being actively cultivated) however the majority have been reclassified as Improved Grassland. This suggests that the land has not been recultivated in the past few years and other species of grasses and broad-leaved plants have become established in the sward.

Four fields have been uncultivated for so long that a species-rich sward has developed, and they have been reclassified as Semi-improved Grassland. As mentioned above, this is a notable change due to the high conservation value of Semi-improved Dry Grasslands in the Channel Islands.

#### *Amenity Grassland*

The amount of Amenity Grassland identified in Sark has changed very little between the 2013 and 2024 surveys, although a large number of areas of land classified as Amenity Grassland has altered.

In 2013, 9.41ha of Amenity Grassland were identified. Most areas no longer classified as Amenity Grassland have changed classification to Improved Grassland. Likewise, of the 9.6ha of Amenity Grassland identified in 2024, many sites newly classified were previously Improved Grassland. These habitat types are often only distinguished by the intensity of mowing, and so it is possible that the management has reduced slightly on these areas, allowing the height of the grass sward to increase or vice versa. However, it is also possible that it is simply the time since last mowing and surveying that it appeared less or more intensively managed at the time of surveying in 2024.

Two sites just before the L'Eperquerie have changed from Amenity Grassland in 2013 to Semi-improved Grassland, likely due to a reduction in mowing frequency.

The ecological value of Amenity Grassland can vary considerably depending on both its historic and current management. For example, sites which have relatively nutrient-poor soils and which are not treated with fertilisers or herbicides, and are mown relatively infrequently, can support a diversity of wildflowers. Those sites mentioned above which have been reclassified as Semi-improved Grassland are likely such examples which has enabled them to be restored to a species-rich grassland sward.

#### *Bare Ground*

The amount of Bare Ground has decreased from 2.3ha identified in 2013, to 0.37ha in 2024. Many of the locations of Bare Ground identified in 2024 were also Bare Ground in 2013. Two large sites which were Bare Ground in 2013 have since been restored to grassland – 0.3ha is now Improved Grassland, and 0.8ha across two sites, has been restored to Semi-improved Grassland (see Figure 12 below). The other loss of Bare Ground since 2013 appears largely due to the encroachment of neighbouring habitats (e.g., Dense Scrub), which is to be expected on sites which are not subject to continued disturbance.





**Figure 12;** An area of Semi-improved Grassland which was formally classified as Bare Ground.

### 3.2 UKHABS

A total of 33 UKHabs habitat types have been located during this survey (see Table 3 below). All areas of land were classified to at least level three classifications, with many being able to be assigned to level 4 or 5 (see appendix 9 for the hierarchy of habitat types).

Essential and recommended secondary codes have been allocated to habitat parcels where appropriate, these are not discussed further in this report, but are available to view in the associated GIS data.

**Table 3.** The UKHabs classification, count and total area (in hectares) of habitats identified in 2024.

UKHabs Primary Code	Count	Area (ha)
G1 Acid grassland	10	9.37
G1a Lowland dry acid grassland	3	4.76
G1c Bracken	90	33.20
G3c Other neutral grassland	27	40.45
G4 Modified grassland	322	395.90
W1f Lowland mixed deciduous woodland	3	2.20
W1g Other broadleaved woodland	97	117.64
W1h Other woodland; mixed	12	4.64
W2c Other coniferous woodland	8	1.35
<b>H1a5 Dry heaths; lowland</b>	<b>84</b>	<b>8.21</b>
H3a Blackthorn Scrub	44	15.81
H3d Bramble Scrub	11	12.99
H3e Gorse Scrub	36	9.87
H3h Mixed Scrub	295	265.25
F2 Fen, marsh and swamp	1	0.05
F2b Purple moor grass and rush pasture	2	0.71
F2e Reedbeds	1	0.19
C1 Arable and horticulture	14	13.87
C1b5 Rye-grass and clover ley	3	6.55
C1c8 Arable fields pollen and nectar	1	2.08
C1d8 Other non-cereal crops	3	1.38
C1e Intensive orchard	5	5.75
U1 Built-up areas and gardens	6	4.23
U1c Artificial unvegetated unsealed surface	1	0.27
S1 Inland rock	2	0.37
S2a Maritime cliff and slope	890	157.19
S2a6 Soft rock sea cliffs	39	3.16
S3 Supralittoral sediment	3	0.13
S3a Sand dunes	1	0.01
R1g Other standing water	5	0.52
T1 Littoral Rock	508	147.19
T2 Littoral Sediment	48	12.97
T2h Beach	17	15.40

As this is the first survey using this methodology in Sark, it is not possible to undertake a comparison with previous years. The sections below give a brief interpretation of the habitat types found, their relative ecological or conservation importance and a description of their type and distribution in Sark.

For UKHabs, the classification of each habitat type's Distinctiveness within Defra's Biodiversity Net Gain metric is also provided. Distinctiveness is a reference to the habitats ecological importance and considers its intrinsic biodiversity value. Distinctiveness scores for all Habitats identified in Sark is included in Appendix 6. A note has also been provided if they are also considered a UK Biodiversity Action Plan habitat (see appendix 5) or if they meet the definition of habitats included in Annex 1 of the Habitats Directive (see appendix 7). A summary table of these classifications of 'conservation importance' is included in Table 5 on page 40. Table 4: A summary of the conservation value of Phase 1 habitat types recorded in Sark in 2024. This includes habitats which are considered a Priority Habitat or Habitat of Conservation Importance in Guernsey, those which may be akin to those classified as a UK Biodiversity Action Plan priority habitat, and if they may meet the definition of habitats included in Annex 1 of the Habitats Directive..

## Grassland

### *Acid grassland*

47ha of Acid Grassland was identified in Sark, the majority (33ha) has classified into the level 4 category of 'Bracken'. This habitat is directly comparable to the Phase 1 classification Continuous Bracken, and has been well described in the results for that habitat above. In the UK, this is considered to be of medium distinctiveness in the UK.

9.4ha, across 10 sites, were classified to level 3 category 'Acid Grassland'. They were generally not able to be classified to a level 4 category as they did not have sufficient diversity of plant species, or did not contain sufficient indicator species within the sward. Nevertheless, these grasslands are of high conservation and ecological value and have a high distinctiveness score in the BNG metric.

A further 4.8ha were classified to level 4 Lowland Dry Acid Grassland. These grasslands contain a higher diversity of plant species and are of high conservation value. They are a UK BAP Priority Habitat, and have a high Distinctiveness score in the BNG metric. This habitat was identified across three sites which represent some of Sark's most species-rich grasslands. The sites varied considerably in their management and use; a cemetery, a field grazed by horses, and a coastal fringe on the edge of a maritime cliff which contained scattered bracken and English bluebells.

### *Neutral grassland*

40ha of Neutral grassland was identified, all of which was classified to the level 4 category 'Other neutral grassland'. These sites contain a relatively high species diversity, and will include some of the most species-rich examples of 'Semi-Improved Grassland' (Phase 1 classification). As the soils in the Channel Islands are mostly naturally acid, these sites may have been treated with lime historically to increase the pH, which in turn increases grass yields. It is considered to have a medium Distinctiveness in the UK, however in a Channel Islands context they are likely to include many sites which would be considered to be of local conservation importance.

### *Modified grassland*

Modified Grassland is the most extensive habitat type in Sark, covering 396ha. These grasslands contain lower species diversity than other grassland sites, and so are of lower conservation value. They have a low distinctiveness classification in the BNG metric.

This category is very similar to Improved Grassland classification in Phase 1; however, it also includes some sites classified as Coastal Grassland, and some Semi-improved Grasslands (those which contain 6 - 8 species per m<sup>2</sup>). Therefore, some sites may still be of local conservation importance.



## Woodland and forest

### *Broadleaved and mixed woodland*

124ha of Broadleaved and Mixed Woodland were identified, all of which was determined to a level 4 category.

The most extensive woodland habitat is Other broadleaved woodland, which is also one of the most extensive habitat types in the island. It is considered to be high Distinctiveness in the BNG metric. This category includes some sites which meet the definition of the Phase 1 woodland classifications Planted Broadleaved Woodland which is a Habitat of Conservation Importance in Guernsey. The majority of sites meet the Phase 1 definition of Semi-natural Broadleaved Woodland would be a Habitat of Conservation Importance and is also considered a Priority Habitat in Guernsey.

Three sites, totally 2.2ha met the definition of Lowland mixed deciduous woodland. They were all sites planted with a diversity of UK native species, including hornbeam (*Carpinus betulus*), beech (*Fagus sylvatica*), ash and oak (*Q. robur*). Lowland Mixed Deciduous Woodlands are UK BAP Priority Habitat and high distinctiveness.

4.6ha across 12 sites were classified as Other woodland; mixed, all of which were classified as Phase 1 habitat type Planted Mixed Woodland which is described in the relevant results section above. This habitat type is considered to have medium distinctiveness in the UK, and it is a Habitat of Conservation Importance in Guernsey.

### *Coniferous woodland*

1.35ha across eight sites were classified as Other coniferous woodland, all of which were classified as Phase 1 habitat type Planted Coniferous Woodland which is described in the relevant results section above. This habitat type is considered to have low distinctiveness in the UK, but it is a Habitat of Conservation Importance in Guernsey.

## Heathland and shrub

### *Lowland heathland*

8.2ha of Lowland heathland has been identified in 2024, this is directly comparable to the Phase 1 classification Coastal Heathland, see relevant results section above. All heathland was assigned to the level 5 category Dry heaths; lowland which is a UK BAP priority habitat (JNCC, 2011) and akin to European dry heaths Annex 1 priority habitat. This habitat has a high Distinctiveness in the BNG metric.

### *Dense scrub*

304ha of Dense scrub has been identified, and this is directly comparable to the Phase 1 classification Dense Scrub, see relevant results section above. The majority of the scrub (265ha) identified was classified as level 4 Mixed scrub, which contains a mix of different species, and no one species being dominant.

Three other level 4 categories were identified in Sark; those dominated by blackthorn (16ha), those dominated by bramble (13ha), and those dominated by gorse (9.9ha).

All four of the level 4 Dense scrub categories have medium distinctiveness in the BNG metric.

## Wetland

### *Fen marsh and swamp*

Wetland habitats are scarce in Sark, with only four sites (0.95ha) having been identified. All habitats classified, however, have high conservation value and have high distinctiveness in the BNG metric.



They include one site classified to the level 3 category Fen, marsh and swamp – this is a small, seasonally wet area (see Figure 13).

Three other sites were classified further to a level 4 category. Two sites (0.71ha) as Purple moor grass and rush pasture, both of which also met the definition of Semi-improved Grassland in Phase 1, and are depicted in Figure 7.

The final site (0.19ha) is an area of reeds which was classified as Reedbeds, this site is described in Phase 1 category Swamp above. As described in that section, this site appears to be used as a waste treatment facility and so may not support the same level of associated biodiversity as true reedbeds.



**Figure 13;** a seasonally wet area of F2 fen, marsh and swamp.

## **Cropland**

### ***Arable and horticultural***

30ha of land was classified as Arable and horticulture, a large proportion of which (14ha) was not further classified to level 4. This category is not of conservation importance and often represents land which is in active cultivation - the impacts of which will depend on the methods used, however this is reflected in its classification as low distinctiveness in the BNG metric.

Three sites (6.6ha) were classified to level 5 Rye-grass and clover ley, all of which were classified as Phase 1 habitat type Arable Short-term Ley which is described in the relevant results section above. This habitat type is considered to have low distinctiveness in the UK and, like arable and horticulture category above, is likely to indicate low ecological value due to disturbance resulting from cultivation.

One site of 2.1ha, was classified as Arable fields pollen and nectar. This site appeared to have been sown with 'wildflowers' such as corn marigold and camomile. Unlike a rye-grass ley, this site will support pollinators by providing a nectar source, and so is considered a habitat of medium distinctiveness in the UK.

Three sites (1.4ha) were planted with asparagus and were classified as Other non-cereal crops. This habitat is also considered to be medium distinctiveness in the BNG metric.

The level 4 habitat Intensive orchard was recorded at five sites, totalling 5.8ha. These sites were planted with fruit trees and hosted regularly mown grassland beneath (See Figure 3). Depending on the management of these sites, they have the potential to support a diversity of associated species, although this will be reduced if the management includes applications of pesticides, for example. Intensive orchards are considered to have medium distinctiveness in the BNG metric.

## **Urban**

### ***Built up areas and gardens***

The habitat survey was deliberately focussed on natural and semi-natural habitats and so the majority of Urban habitats in Sark were not surveyed. Of the sites surveyed, seven met the definition of Built-up areas and gardens, six of which also met the definition of Phase 1 classification Parkland, indicating that they comprised of closely-mown grassland with scattered trees. This category has a low distinctiveness in the BNG metric, however they may still support important wildlife, including, for example, breeding garden birds.

One site was further classified to level 4 Artificial unvegetated unsealed surface. This site was an area of bare ground and appears to be part of a building site. This category also has a low distinctiveness in the BNG metric.

## **Sparsely vegetated land**

161ha of Sparsely vegetated land were classified in Sark, across three different level three types; Inland rock, Supralittoral Rock and Supralittoral Sediment. The land classified as Sparsely vegetated is situated entirely on the coast, and is present around the entire coastline.

### ***Inland rock***

2 sites, of 0.37ha, were classified as Inland Rock. They were both areas of quarry, and are considered to be of medium distinctiveness in the BNG metric.

### ***Supralittoral rock***

This category includes Maritime cliff and slope, which is closely comparable to the Maritime Cliff and Slope category in the Phase 1 habitat classification system, however it also includes areas classified as Rock and Bare Ground and does not include areas of land which meet the Phase 1 classification 'Coastal Heathland'

It is a high distinctiveness habitat and is akin to the Habitats Directive Annex 1 habitat 'Vegetated sea cliffs of the Atlantic and Baltic coasts'. This is therefore considered a habitat of local, national, and international importance. 157ha were classified in Sark, making it one of the most extensive habitat types in the island.

An additional 3.2ha were classified as level 4 category Soft rock sea cliffs, a habitat which is directly comparable to Phase 1 Soft Cliffs, and has been described in the relevant results section above. This category is also considered to be highly distinctive and also makes up part of the Annex 1 habitat 'Vegetated sea cliffs of the Atlantic and Baltic coasts'.

### ***Supralittoral sediment***

Supralittoral sediment is a scarce habitat group in Sark, with only four sites meeting the definition of this category; they include three sites of shingle and one of sand, which are described in the results sections of the equivalent Phase 1 habitats Shingle and Sand/Mud. Both habitats are considered to have high distinctiveness in the BNG metric.

## Rivers and lakes

### *Standing open water and canals*

0.52ha across five sites were classified as Other standing water, all of which were classified as Phase 1 habitat type Standing Water, which is described in the relevant results section above. This habitat type is considered to have medium distinctiveness in the UK, but it is a Habitat of Conservation Importance and a Priority habitat in Guernsey.

## Marine inlets and transitional waters

### *Littoral rock*

147ha of Littoral rock were classified in Sark, making it the most abundant habitat type in the intertidal zone. All areas of land included in this category were also classified as Phase 1 category Intertidal Rocks and Boulders, which is described in the relevant results section above. This habitat type is considered to have high distinctiveness in the UK.

### *Littoral sediment*

13ha of Littoral sediment were classified in Sark's intertidal zone. All areas of land included in this category were also classified as Phase 1 category Intertidal Shingle, which is described in the relevant results section above. This habitat type is considered to have high distinctiveness in the UK.

An additional 17 sites, totalling 15ha, were classified to level 4 category Beach. This category is comparable to the Phase 1 Intertidal Sand, which is described in the relevant results section above. This habitat type is considered to have high distinctiveness in the UK.



### 3.3 Target Notes

Target notes were made wherever notable species or habitats below minimum mappable units (5m<sup>2</sup>) were identified, or in order to record species lists, management information or other notable observations.

186 target notes were made throughout the 2024 survey. They are available as a digital GIS layer and many points are also associated with a photo as an attachment.

The notes collected include the observation of the following invasive non-native species (INNS) which were identified during the survey:

- Cape ivy, or German ivy (*Delairea odorata*) was recorded from two locations (TN 147 and 171). This is a climbing plant which is easy spread by small fragments of vegetation. Historically, cold winters kept this plant in check, however now winter frosts are much less common, it is becoming more abundant and very difficult to prevent spreading. Control is best achieved through a combination of chemical treatment and ongoing physical removal (and careful disposal to prevent onward spread). Given its limited distribution and known invasive nature it is recommended that an eradication attempt is made for this plant.
- Parrots feather (*Myriophyllum aquaticum*) – in a pond (TN 113), been there a while. Control is very difficult, but do not allow it to spread by preventing material from being moved out of that pond to another.
- Bears' breeches (*Acanthus mollis*) – TN 164. In an area of coastal land which has been gardened. Recommend that it is removed, will require removal for several years as the deep root systems readily produce new plants. Soil that is, or potentially could be, contaminated by bear's breeches should not be moved to new sites as this will likely result in the spread of this invasive plant. Unlikely to be able to eradicate it, but should consider removing it from sensitive locations such as this site on the cliffs.
- One site of Japanese knotweed (*Reynoutria japonica*) was identified (TN 115). The impacts of this plant are well documented, and invasions often result in both economic and environmental impacts. Best controlled using glyphosate, although eradication is not likely, control of this patch should be undertaken to prevent onward spread.
- Pampas grass (*Cortaderia selloana*) (TN 144) when first introduced, most plants were female, which were not able to spread widely. Unfortunately, since the introduction of male plants, pampas grass now spreads rapidly and can occupy almost any habitat, resulting in significant ecological impacts, and is costly to remove. As it is not yet widespread in Sark, this plant should be considered for eradication.
- Rhododendron (*R. ponticum*) (TN 95, 198). It is believed that this is only present in one location in Sark, which is close to the Dixcart Hotel. Its impacts have been widely reported and, given Sark's acid soils and abundance of Semi-improved Broadleaved Woodland, there is the potential for this species to spread to the detriment of the natural environment. Eradicating this species and replacing it with non-invasive shrubs should be considered.
- Japanese rose (*Rosa rugosa*) (TN 189) This plant has become very problematic along the coasts of many northern European countries. It spreads both by seed and by creeping rhizomes, which means it is easily able to form dense stands. The soil types and climate in

the Channel Islands appear to be well within this species environmental requirements and it is considered a very high risk species by both the States of Guernsey and Government of Jersey which has the potential to become very problematic in the future.

- Sour fig (*Carpobrotus edulis*) (TN 105) this species was identified from one site in Sark – at Le Clos Bourel. This species spreads to form dense mats which smothers native habitats, and has resulted in the loss of many hectares of coastal grasslands and sand dune habitats in Guernsey. Whilst it is relatively easy to remove from accessible areas, it is almost impossible to remove from cliffs when it establishes there. Given the ecological importance, and the inaccessible nature of Sark's coastline, it is strongly recommended that this species is eradicated from the island.



**Table 4:** A summary of the conservation value of Phase 1 habitat types recorded in Sark in 2024. This includes habitats which are considered a Priority Habitat or Habitat of Conservation Importance in Guernsey, those which may be akin to those classified as a UK Biodiversity Action Plan priority habitat, and if they may meet the definition of habitats included in Annex 1 of the Habitats Directive.

JNCC Phase 1 habitat classification	Guernsey Priority Habitats	Guernsey Habitats of Conservation Importance	UK BAP Priority Habitats	Habitats Directive Annex 1 Habitats
Semi Natural Broadleaved Woodland	x	x	Lowland Mixed Deciduous Woodland	
Planted Broadleaved Woodland		x		
Planted Coniferous Woodland		x		
Planted Mixed Woodland		x		
Plantation Woodland			Traditional Orchards	
Parkland				
Dense Scrub				
Unimproved Grassland	x	x	Lowland meadows	Lowland Hay Meadows
Semi-improved Grassland	x	x	Lowland Meadows	
Improved Grassland				
Semi-improved Marshy Grassland		x		
Continuous Bracken				
Tall Ruderal				
Swamp	x	x	Reedbeds*	
Standing Water	x	x	Ponds	
Intertidal Sand				
Intertidal Shingle				
Intertidal Rock and Boulders				
Shingle	x	x		
Rock	x			

<b>Hard Cliff</b>	<b>x</b>	<b>x</b>	Maritime Cliff and Slopes	Vegetated sea cliffs of the Atlantic and Baltic coasts
<b>Soft Cliff</b>	<b>x</b>	<b>x</b>	Maritime Cliff and Slopes	Vegetated sea cliffs of the Atlantic and Baltic coasts
<b>Coastal Grassland</b>	<b>x</b>	<b>x</b>	Lowland Dry Acid Grassland, Maritime Cliff and Slopes	Vegetated sea cliffs of the Atlantic and Baltic coasts
<b>Coastal Heathland</b>	<b>x</b>	<b>x</b>	Maritime Cliff and Slopes	Vegetated sea cliffs of the Atlantic and Baltic coasts, European Dry Heaths
<b>Quarry</b>				
<b>Arable Land</b>				
<b>Arable Land short term ley</b>				
<b>Amenity Grassland</b>				
<b>Bare Ground</b>	<b>x</b>			
<b>Sand / Mud</b>				

\*The reedbed identified in Sark is not likely to support the same associated species as a true reedbed and therefore may not be of the same value.

**Table 5:** A summary of the conservation value of UKHabs habitat types recorded in Sark in 2024. This includes habitats which may be akin to those classified as a UK Biodiversity Action Plan priority habitat, the classification of each habitat type's Distinctiveness within Defra's Biodiversity Net Gain metric (a reference to the habitats ecological importance and considers its intrinsic biodiversity value) and if they may meet the definition of habitats included in Annex 1 of the Habitats Directive.

UKHabs Primary Code	UK BAP Priority Habitats	Distinctiveness value	Habitats Directive Annex 1 Habitats
G1 Acid grassland		High	
G1a Lowland dry acid grassland	Lowland Dry Acid Grassland	High	
G1c Bracken		Medium	
G3c Other neutral grassland	Lowland meadows	Medium	Lowland Hay Meadows
G4 Modified grassland		Low	
W1f Lowland mixed deciduous woodland	Lowland mixed deciduous woodland	High	
W1g Other broadleaved woodland		High	
W1h Other woodland; mixed		Medium	
W2c Other coniferous woodland		Low	
H1a5 Dry heaths; lowland	Maritime Cliff and Slopes	High	European dry heaths
H3a Blackthorn Scrub		Medium	
H3d Bramble Scrub		Medium	
H3e Gorse Scrub		Medium	
H3h Mixed Scrub		Medium	
F2 Fen, marsh and swamp		High	
F2b Purple moor grass and rush pasture		High	
F2e Reedbeds	Reedbeds*	High	
C1 Arable and horticulture		Low	
C1b5 Rye-grass and clover ley		Low	
C1c8 Arable fields pollen and nectar		Medium	
C1d8 Other non-cereal crops		Medium	
C1e Intensive orchard		Medium	



U1 Built-up areas and gardens		Low	
U1c Artificial unvegetated unsealed surface		Low	
S1 Inland rock		Medium	
S2a Maritime cliff and slope	Maritime Cliff and Slopes	High	Vegetated sea cliffs of the Atlantic and Baltic coasts
S2a6 Soft rock sea cliffs	Maritime Cliff and Slopes	High	Vegetated sea cliffs of the Atlantic and Baltic coasts
S3 Supralittoral sediment		High	
S3a Sand dunes		High	
R1g Other standing water		Medium	
T1 Littoral Rock		High	
T2 Littoral Sediment		High	
T2h Beach		High	

## 4. DISCUSSION

The most dominant habitat types in Sark are species-poor dry grasslands (Improved/Modified Grasslands) and dense scrub, which is similar to the results from comparable surveys across the other Channel Islands. This survey has also identified a large proportion of other habitats which are of higher conservation importance and often support a high diversity of associated species, such as woodland, species-rich grasslands, and maritime cliff and slope.

Between 2013 and 2024, there have been some notable changes in the abundance and distribution of habitats found in Sark. Some changes are due to natural succession occurring on areas of natural land or abandoned farmland, which has led to an increase in scrub habitats across the island. Other recorded changes are the result of human activity, such as the restoration and sensitive management of grasslands, which has contributed to a notable increase in the amount of species-rich grasslands. This change is contrary to trends identified in other jurisdictions and is likely to reflect the sensitive grazing and limited use of artificial fertilisers and pesticides. The Unimproved Grassland identified may be one of the last remaining examples in the Bailiwick of Guernsey and warrants protection.

### 4.1 Habitats of conservation importance

A number of habitats which meet the definition of habitats included on Annex 1 of the EU Habitats Directive, and are considered of International importance, have been identified in Sark. As well as the dry grassland habitats described above (many of which are likely to meet the definitions of Annex 1 habitat type Lowland hay meadows), Sark's coastline is almost entirely classified as habitats which meet the definition of Vegetated sea cliffs of the Atlantic and Baltic coasts. Within Sark's sea cliffs are areas of dry lowland heathland which is also likely to meet the definition of Annex 1 habitat European dry heaths. Being of international importance, these habitats could be considered for protection should Sark seek to designate protected sites, for example, to contribute to the '30x30' targets within the Kunming-Montreal Global Biodiversity Framework.

Several other habitat types may be considered of National Importance as they are either UK BAP habitats, or Priority Habitats in Guernsey. These include sites which meet the definitions of Ponds, Traditional Orchards, Lowland Mixed Deciduous Woodland, Lowland Dry Acid Grassland, Lowland Meadows, Lowland Heathland and Maritime Cliff and Slopes.

A summary of the conservation importance of habitats identified in Sark are contained in Table 4 (Phase 1) and Table 5 (UK Habs).

Boundaries were not surveyed in either 2013 or 2024, however it is evident whilst undertaking the survey that Sark's field boundaries are almost entirely bounded by species-rich hedgerows. Hedgerows are also a UK BAP habitat.

### 4.2 Recommendations for Future Management

Most of the findings within this survey have been positive, however the following management actions are recommended in order to address the increase in dense scrub and the identification of several INNS of concern:

- Expand conservation grazing: the introduction of goats at L'Eperquerie Common has shown promise in controlling scrub encroachment. Extending grazing to other coastal areas could help protect and restore Coastal Grassland and Heathland habitats.
- Targeted scrub clearance: in areas where scrub has overtaken habitats of higher conservation value, selective clearance should be considered, particularly where it threatens habitats of International or National importance.
- INNS control and eradication: Immediate action should be taken to control invasive species. Given the limited availability, it is recommended that action is prioritised for INNS which are of limited distribution (and therefore can be feasibly be eradicated), in or adjacent to habitats of conservation importance, and for INNS which pose significant ecological risk.

- Ongoing sensitive management: many of the habitats identified in Sark are vulnerable to changes in management and they reliant on ongoing sensitive management, especially the grasslands and heathlands which will quickly succeed to bracken or scrub if abandoned or lose their species richness if managed too intensively. The application of artificial fertilisers and pesticides should continue to be used sparingly and restricted from habitats of conservation importance where ever possible.

#### **4.3 Methodology**

The use of Phase 1 methodology has been invaluable in understanding changes in habitat abundance since 2013 and in comparing these changes to trends recorded across the Channel Islands. However, as the UK has moved to use the UKHabs classification system, Phase 1 may be of limited use in the future. It is hoped that the conversion tables included in Appendices 8 and 9 will be useful to allow the 2013 survey to continue to be useful to consider future trends should UKHabs continue to be used.

Repeat surveys are essential to track changes at an island scale and continue to ensure that decision making is informed by the best available data. Repeat surveys can also be used to measure the effectiveness of management interventions or impacts of future land use change. It is recommended that an island-wide habitat survey is repeated in 5-10years.

The availability of improved aerial photography has proven valuable in improving the accuracy of the mapping and especially in identifying areas of habitats of conservation importance previously unknown. This should be borne in mind when commissioning aerial photography in the future.

## **5. CONCLUSIONS**

The 2024 survey has provided an update to the previous Phase 1 habitat survey undertaken in 2013 and has provided a new baseline of habitats using the UKHabs classification.

The results evidence that Sark supports a diversity of habitats, many of which are of international importance. Since 2013, there has been a significant increase in many important habitats, including species-rich grasslands. Scrub encroachment and invasive non-native species are ongoing threats to the island's biodiversity, and interventions such as increasing conservation grazing and INNS management could help address these.

## 6. REFERENCES

- Carey, P., and Butcher, B. (**undated**). UK Habitat Classification Field Key. Available online at [www.ukhab.org]
- Department for Environment, Food & Rural Affairs (Defra) (**2024**). The Statutory Biodiversity Metric: User Guide. Available online at: [https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides].
- Environment Act **2021**, c.30, Part 6, ss.98–101. Available online at [www.legislation.gov.uk/ukpga/2021/30/part/6/crossheading/biodiversity-gain-in-planning]
- Hayward, A., & Scopes, E. (**2019**). Habitat Survey of Guernsey, Herm and Associated Islands 2018. Environment Guernsey, Guernsey. Available online at [www.gov.gg/habitatsurvey]
- Joint Nature Conservation Committee (JNCC) (**2010**). Handbook for Phase 1 Habitat Survey – a technique for environmental audit. 3<sup>rd</sup> edition. JNCC, Peterborough.
- Joint Nature Conservation Committee (JNCC) (**2011**). UK Biodiversity Action Plan: Priority Habitat Descriptions. BRIG (ed. Ant Maddock) 2008. Available online at [https://hub.jncc.gov.uk/assets/2728792c-c8c6-4b8c-9ccd-a908cb0f1432]
- UKHab Ltd (**2023**). The UK Habitat Classification, Version 2.0. Available online at [www.ukhab.org]
- Pinel, J. (**2022**). Guernsey Habitat and Species Evaluation Project. Available upon request from ACLMS@gov.gg
- Henney, J. (**2019**). Habitats of Conservation Importance in Guernsey. Available upon request from ACLMS@gov.gg

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## 7. APPENDICES

### Appendix 1 Phase 1 Habitat Classification Descriptions

#### WOODLAND AND SCRUB (A)

##### Woodland (A1)

The vegetation of woodland is dominated by trees more than 5m high when mature, forming a distinct, although sometimes open, canopy, with cover of at least 30%. The dominant species, under storey and field layer were target noted. This category is further divided into broadleaved, coniferous and mixed woodlands.

Broadleaved woodland may be semi-natural or planted. Semi-natural Woodland (A1.1.1) includes all stands which did not originate from planting, or where the planted trees account for less than 30%. They consist of native species such as Pedunculate Oak (*Quercus robur*), Elder (*Sambucus nigra*) and Ash (*Fraxinus excelsior*) but also self-sown stands of introduced species, e.g. Sycamore (*Acer pseudoplatanus*) and Holm Oak (*Quercus ilex*).

Planted Broadleaved Woodlands (A1.1.2) are those with at least 90% broadleaved trees, and where at least 30% of those are planted. All obviously planted woodlands of any age are included. Previous aerial photographs were used to determine if areas were planted or semi-natural if it was not clear. However, woodland planted more than around 50 years ago may well appear to be semi-natural.

Coniferous Woodland (A1.2.2) comprises at least 90% conifers. As there are no conifers native to the Bailiwick of Guernsey and they seldom set viable seed, all coniferous woodlands are planted.

Mixed Woodland (A1.3.2) comprises 10-90% of either broadleaved or coniferous woodland.

A further category, Plantation Woodland (A1.5), has been included to encompass orchards.

##### Scrub (A2)

This is areas of vegetation dominated by shrubs, usually less than 5m tall, such as Gorse (*Ulex europaeus*), Blackthorn (*Prunus spinosa*), Hawthorn (*Crataegus monogyna*), Brambles (*Rubus fruticosus*) and Sallow (*Salix cinerea*). Where it formed a mosaic with Bracken (*Pteridium aquilinum*), it was classed as Scrub if it was not possible to walk through the area because of the presence of Brambles (see Continuous Bracken, C1, for comparison). If growing on sand dunes, it was classed as Dune Scrub (H6.7) and, if Ericaceous (Heather) species were present, as Coastal Heathland (H8.5) or Dune Heathland (H6.6). In line with habitat surveys of Guernsey, 'Scattered Scrub' was omitted from this survey as a habitat code, but may be target noted.

##### Parkland/scattered trees (A3)

Parklands are areas of closely mown grassland with a tree cover of less than 30%. In the Channel Islands this consists mainly of large gardens or estates and appears as a highly manicured habitat.

Scattered Trees were incorporated into the survey as a layer of single points including all broadleaved trees, either planted or semi-natural, that are not already encompassed in a habitat classified as Woodland (A1.1) or Earthbank with trees (J2.8.4).

#### GRASSLAND AND MARSH (B)

The JNCC classifications divide grasslands into Acid, Neutral and Calcareous. However, in the Bailiwick of Guernsey, almost all grasslands (with the exception of Dune Grassland (H6.5) which may be calcareous due to shell fragments) are likely to be neutral. So for the purposes this study, dry grasslands were only divided by the degree of improvement; Unimproved, Semi-improved and Improved Grasslands.

It is difficult to distinguish between unimproved, semi-improved and improved grasslands as they form a continuum. In order to clarify this issue we adhered to the Grassland Trust's (2008) definitions, which classify the grasslands depending on diversity of forbs (broad-leaved plants) and abundance of grasses per m<sup>2</sup>, with some alteration to take into account the reduced diversity of such plants found in the Bailiwick of Guernsey. Not only does this provide a more objective classification, but it also provides a definition that can be standardized for use in future studies, increasing comparability. A Phase 2 habitat survey of these grasslands was also performed (see section 3.2).

### **Unimproved Grassland (B1)**

Land which has not been so intensively grazed or has not had sufficient applications of herbicide or fertilizer as to alter the sward composition significantly, or the effects of such treatment have disappeared, is classified as Unimproved Grassland. The Grasslands Trust suggests that there will be at least 15 different species of broad-leaved plants per m<sup>2</sup>, cover of Ryegrass (*Lolium perenne*) and White Clover (*Trifolium repens*) is less than 10%, and that cover of wildflowers and sedges (*Carex* sp.) is generally greater than 30%. Typically it is very species-rich in both forbs, such as Primrose (*Primula vulgaris*), Violet (*Viola riviniana*), etc. and grasses.

### **Semi-improved Grassland (B2)**

Semi-improved Grassland is an intermediate category between Improved and Unimproved Grasslands. It has a less diverse and natural sward than Unimproved Grassland, but is more diverse than Improved Grasslands and is still of some conservation value. There are between 8-15 different species of broad-leaved plants per m<sup>2</sup>, less than 30% cover of Ryegrass (*Lolium perenne*) and White Clover (*Trifolium repens*), and the cover of wildflowers and sedges (*Carex* sp.) is generally greater than 10%.

### **Improved grassland (B4)**

Improved Grassland has been so heavily treated with fertilizer or herbicide, or so heavily affected by grazing or drainage, or has been reseeded so that most of the species diversity has been lost. There are less than eight species of broad-leaved plants per m<sup>2</sup>, more than 30% Ryegrass (*Lolium perenne*) and White Clover (*Trifolium repens*), and less than 10% cover of wild flowers and sedges (*Carex* sp.). The broad-leaved plants commonly found were Ribwort Plantain (*Plantago lanceolata*), Docks (*Rumex* spp.), and species of clover (*Trifolium* spp.).

### **Marsh/marshy grassland (B5)**

This category encompasses wet meadows or grasslands which are periodically flooded or waterlogged by fresh water (Landwise report, 2002). They have a high proportion of sedges (*Carex* sp.) and rushes (*Juncus* sp.), often with Ragged Robin (*Silene flos-cuculi*), Fleabane (*Pulicaria dysenterica*) and various species of orchids.

This category has been further divided into Unimproved and Semi-improved Marshy Grasslands. Unimproved Marshy Grasslands (B5.1) are generally not dominated by grasses, they have a high diversity of broadleaved plants often including Yellow Bartsia (*Parentucellia viscosa*), Marsh Bed-straw (*Galium palustre*) and various rarer sedges (i.e. *Carex nigra*, *C. punctata* etc). As with dry grasslands, these areas have not been so intensively grazed or drained, or have not had sufficient applications of herbicide or fertiliser as to alter the sward composition significantly, or that the effects of such treatment have disappeared.

Semi-improved Marshy Grasslands (B5.2) have been treated with fertiliser or herbicide or affected by grazing or drainage so that the sward composition has been altered, but is still species-rich. These areas will contain a higher proportion of grasses than Unimproved Marshy Grassland and will often be dominated in patches by Creeping Bent (*Agrostis stolonifera*), Galingale (*Cyperus longus*) and with scattered Reeds (*Phragmites australis*).

Marshy Grasslands which have been so heavily improved that they have lost most, if not all, the Marshy Grassland indicator species are classified as Improved Grassland (B4).



### TALL HERB AND FERN (C)

Areas dominated by Bracken (*Pteridium aquilinum*) are classified as Continuous Bracken (C1). They often form a mosaic with Brambles (*Rubus fruticosus*) (see A2 for comparison). As with Scattered Scrub, JNCC includes a Scattered Bracken category, this is represented by a dot on the map and is difficult to compare statistically, so areas of Bracken large enough to classify are all included under Continuous Bracken.

Stands of perennial or biennial broad-leaved plants greater than 25cm tall e.g. Nettles (*Urtica dioica*), Docks and Sorrel (*Rumex* sp.), Hemlock Water-Dropwort (*Oenanthe crocata*) etc are classified as Tall Ruderal (C3.1).

### SWAMP, MARGINAL AND INUNDATION (F)

Swamp (F1) is used to classify vegetation which is generally in Standing Water for a large part of the year, but may occasionally be found on substrates that are seldom immersed, as in the later stages of the serial succession to Marshy Grassland. This category includes single species stands of Reed (*Phragmites australis*). Water Dock (*Rumex hydrolapathum*) and Branched Bur-Reed (*Sparganium erectum*) are often found in this habitat.

### OPEN WATER (G)

#### Standing Water (G1)

The JNCC categories give five categories of fresh water habitat. As in habitat surveys undertaken in Guernsey, these were not used. Instead all standing fresh-water which is not seasonal we classified as Standing Water.

### COASTLAND (H)

#### Intertidal zone (H1)

The intertidal zone was defined using the mean high water mark and mean low water mark in the Digimap database as linear features (see section 2.1). It was divided into Intertidal Sand, Intertidal Shingle and Intertidal Rocks and Boulders. The sand, shingle and rocks above the high tide mark were classified separately to those in the intertidal range.

#### Maritime cliff and slope (H8)

Maritime cliffs are divided into Hard Cliffs (H8.1), those formed from rock with less than 10% vegetation cover, and Soft Cliff (H8.2), those formed from soil or sand. Soft Cliffs are an important habitat for many invertebrate species, but difficult to map as polygonal features as they are generally nearly vertical.

Coastal Grassland (H8.4) contains maritime species such as Thrift (*Armeria maritima*), Autumn Squill (*Scilla autumnalis*), Sea Mouse-ear (*Cerastium diffusum*), Sea Campion (*Silene uniflora*), English Stonecrop (*Sedum anglicum*), Sheep's Bit (*Jasione montana*), with the dominant grasses being Red Fescue (*Festuca rubra*) and Cock's Foot (*Dactylis glomerata*).

Coastal Heathland (H8.5) communities in Sark contain Bell Heather (*Erica cinerea*) or Ling (*Calluna vulgaris*). Unlike the heaths in Jersey, Brittany and southwest England, they contain very little Western Gorse (*Ulex galii*) which is extremely rare in the island.

### ROCK EXPOSURE AND WASTE (I)

Other exposure (Rock, I1.4) this category encompasses all rock exposure less than 2m high, or at a slope of less than 60°. Vascular plant cover must be less than 10% (see also Hard Cliff, H8.1)

Quarries (I2.1) excluding water filled quarries which were classed as Standing Water (G1).

## MISCELLANEOUS (J)

### Cultivated/Disturbed Land (J1)

Cultivated/Disturbed Land is split into 4 categories; Arable Land (J1.1.1), Short-Term Leys (J1.1.2), Amenity Grasslands (J1.2) and Brownfield Sites (J1.5).

Arable Land includes land currently used for crop production or land left fallow but that will shortly be returned to crop production. Short-term Leys are grasslands that have been seeded, usually with Ryegrass (*Lolium* sp.) or Clover (*Trifolium* sp.) and are left for up to 7 years.

Amenity Grasslands are areas heavily mown, and often seeded, i.e. playing fields and domestic lawns which have lost most broad-leaved plant species.

All Bare Ground (J4) that can be easily colonised by pioneer species was classified. This did not include land covered in tarmac or other materials that prevent colonisation.

Large areas of introduced invasive plants such as Japanese Knotweed (*Reynoutria japonica*) were target noted.



## Appendix 2 UKHabs Habitat Classification descriptions

### Grassland

#### G1 Acid grassland

G1a Lowland dry acid grassland – a grassland that has a high abundance of acid grassland indicators and which meets two out of the following three criteria:

1. Greater than 12 species per m<sup>2</sup>
2. Greater than 30% cover of broadleaved herbs and sedges
3. Less than 10% cover of rye grasses (*Lolium* spp.) and white clover (*Trifolium repens*)

G1c Bracken – land with at least 95% cover of bracken (*Pteridium aquilinum*) at the peak of the growing season.

#### G3 Neutral Grassland

Vegetation dominated by grasses and herbs, on soils with a pH of 4.5-6.5.

G3c Other neutral grassland – a grassland which does not meet the definition of a neutral hay meadow (G3a or G3b) and meets the criteria for a waxcap grassland or which meets three out of the following four criteria:

1. Greater than 20% cover of broadleaved herbs and sedges
2. Greater than eight species per m<sup>2</sup>
3. More than one species of grass not generally sown for intensive agriculture is abundant (e.g., rye grass (*Lolium* spp.))
4. Less than 30% cover of rye grasses (*Lolium* spp.) and white clover (*Trifolium repens*)

#### G4 Modified grassland

Vegetation dominated by a few fast-growing grasses on fertile, neutral soils. It is frequently characterised by an abundance of rye-grass (*Lolium* spp.) and white clover (*Trifolium repens*).

### Woodland and Forest

Vegetation cover consisting of over 25% cover of trees (canopy-forming woodland and forest tree species).

#### W1 Broadleaved and mixed woodland

More than 80% broadleaved trees in the tree canopy.

W1f Lowland mixed deciduous woodland – Lowland woods of at least 25% cover of Ash (*Fraxinus excelsior*) and/or a suite of other species, but less than 75% cover of native oak (*Quercus* spp.).

W1g Other broadleaved woodland – Broadleaved woodlands that do not meet the classification of W1f, including stands of non-native species and Sycamore (*Acer pseudoplatanus*) that has developed through recent succession.

W1h Other woodland; mixed – A mixture of broadleaved and coniferous trees in which either make up >80% of the tree cover.

#### W2 Coniferous woodland

More than 80% conifers in the tree canopy.

W2c Other coniferous woodland – Coniferous woodland with less than 25% Scots pine (*Pinus sylvestris*)

### Heathland and shrub

Vegetation with over 25% cover of woody species that are not trees, e.g., dwarf shrubs, where land is not waterlogged.

#### H1 Dwarf Shrub heath

Dwarf vegetation in largely open landscapes which is found on impoverished soils and dominated by ericaceous species.

H1aa Dry heath; lowland – dominated by ling (*Calluna vulgaris*) and bell heather (*Erica cinerea*), and in a mosaic with gorse (*Ulex europaeus*). Cross-leaved heather (*E. tetralix*) is not present.

#### H3 Dense scrub

Patches of shrubs that are less than 5m in height with at least 75% cover.

H3a Blackthorn Scrub – dense scrub with blackthorn (*Prunus spinosa*) dominant. N.B. Many of the examples found may be similar to those classified as H3a5 West coast blackthorn scrub, however this definition is restricted to habitats in the ‘west coast of the UK’.

H3d Bramble Scrub - dense scrub with brambles (*Rubus fruticosus* agg.) dominant.

H3e Gorse Scrub - dense scrub with European gorse (*Ulex europaeus*) dominant.

H3h Mixed Scrub - dense scrub comprising a mixture of species without a single species dominant, or with a species not listed in the other level 4 categories dominant.

### Wetland

Inundated or waterlogged habitats (where standing water is present for more than 50% of the year. Excludes deciduous woodland.

#### F2 Fen, marsh and swamp

A variety of vegetation types that are found on permanently, seasonally or periodically waterlogged land, often associated with valleys or hollows.

F2b Purple moor grass and rush pasture – Dominated by rushes (*Juncus* spp.) and in the UK is often by purple moor grass (*Molinia caerulea*), occurring on poorly drained, usually acidic soils, often associated with saturated valley-sides and spring lines.

F2e Reedbeds – wetlands, where the water table is at or above ground level for most of the year, that are dominated by stands of common reed (*Phragmites australis*).

### Cropland

Land used for agricultural crops which has been cultivated or cropped within the current or previous year, including intensive orchards, ploughed fields, and tree nurseries.

#### C1 Arable and horticulture

Arable cropland, commercial horticultural land, freshly ploughed land, leys, rotational set-aside and fallow land.

C1b Temporary grass and clover leys – temporary grass or legumes in rotation with tilled crops, usually as a soil conservation measure.

C1b5 Rye-grass and clover ley – temporary grass with rye-grasses dominant (e.g., *Lolium perenne* and *L. multiflorum*).



C1c Cereal crops – fields sown with crops of cereal, such as wheat, oat and barley.

C1c8 Arable fields pollen and nectar – fields sown with wildflowers, often sown to provide nectar for pollinating insects.

C1d Non-cereal crops – fields sown with crops that are not cereals, including land sown for coppice, vineyards, and biofuel crops.

C1d8 Other non-cereal crops – crops which are not cereals, and are not biofuel, coppice or vineyards.

C1e Intensive orchard – orchards (including nut and hop plantations) which are intensively managed. They will have a heavily mown understory which is often treated with herbicides, and is species poor.

### Urban

Constructed, industrial and other artificial habitats or features within rural areas. This includes buildings, industrial or residential areas, and may be sealed (e.g., tarmac) or unsealed (e.g., gravel).

#### U1 Built-up areas and gardens

As above (all Urban land falls within this level 3 code).

U1c Artificial unvegetated unsealed surface – land that has <10% cover of vegetation through human activity and where the surface of the soil is not sealed with impervious materials.

### Sparsely vegetated land

Unvegetated, disturbed, or sparsely vegetated habitats, with less than 50% cover of stress tolerant vegetation, that are not constructed surfaces. Including natural rock or soil surfaces, supralittoral sediment and coastal habitats.

#### S1 Inland rock

Mappable areas of exposed rock, which may be natural or artificial. Including inland cliffs, excavations and quarries.

#### S2 Supralittoral rock

The land immediately above the high water mark which is subject to salt spray and wave action, but will not be inundated on high spring tides. Including the cliffs and slopes adjacent.

S2a Maritime cliff and slope – land between the ‘splash zone’ and the extend of the limit of salt spray influence. It will be dominated by species that are tolerant to wind exposure and salt spray, such as sea campion (*Silene unflora*), thrift (*Armeria maritima*) and buck’s horn plantain (*Plantago maritima*).

S2a6 Soft rock sea cliffs – sea cliffs made of soft substrate that relatively easily eroded and often established with early successional vegetation, or they may be newly eroded and lack any significant vegetative cover.

#### S3 Supralittoral sediment

Sand and shingle habitat above the high water mark which are subject to salt spray and wave action, but will not be inundated on high spring tides.

S3a Sand dunes – sand covered shorelines which are often colonised by specialist maritime grasses such as marram grass (*Ammophila arenaria*)



### **Rivers and Lakes**

All freshwater ecosystems.

#### **R1 Standing open water and canals**

This category includes natural freshwater ecosystems, such as lakes and meres, and human-made systems, such as ponds and drainage ditches. It does not include wide marginal vegetation or wetland habitats.

R1g Other standing water – includes ponds water bodies which are less than 2ha in area, and they may be eutrophic, mesotrophic or oligotrophic. They will retain water all year round (i.e., they are not temporary water bodies).

### **Marine inlets and transitional waters**

All intertidal habitats between the mean low and mean high tide marks.

#### **T1 Littoral Rock**

Rock or boulder habitats in the intertidal zone, stretching from lichen covered rocks at the upper shore, to the lower shore habitats such as red seaweed and kelp communities. The rock habitats in the intertidal zone were not classified beyond the primary level 3 category.

#### **T2 Littoral Sediment**

Sediment in the intertidal zone, including shingle, coarse sediment, sand or mud. Some may be colonised by specialists such as eelgrass (*Zostera* spp.) or sandbinder seaweed (*Rhodothamniella floridula*).

T2h Beach – sand and shingle sediment. This excludes eelgrass beds or beaches comprising of silt or mud sized particles.

### Appendix 3 Guernsey Priority Habitats

JNCC Phase 1 habitat types considered to be 'Priority' in Guernsey (Pinel, 2022). Those included in grey were not identified in the 2024 habitat survey of Sark.

JNCC Phase 1 Habitat Type
Semi-Natural Broadleaved Woodland
Unimproved Grassland
Semi-Improved Grassland
Unimproved Marshy Grassland
Swamp
Standing Water
Running Water
Saltmarsh
Shingle Banks
Rock Habitats
Dune Slack
Dune Grassland
Dune Heath
Dune Scrub
Open Dune
Hard Cliff
Soft Cliff
Coastal Grassland
Coastal Heathland
Brownfield Sites
Bare Ground
Grass-covered Earthbanks
Bracken-covered Earthbanks
Tree-covered Earthbanks
Species-rich Hedgerows

## Appendix 4      Guernsey Habitats of Conservation Importance

JNCC Phase 1 habitat types considered to be of Conservation Importance in Guernsey (Henney, 2019). Those included in grey were not identified in the 2024 habitat survey of Sark.

JNCC Phase 1 Habitat Type
Semi Natural Broadleaved Woodland
Planted Broadleaved Woodland
Planted Coniferous Woodland
Planted Mixed Woodland
Unimproved Grassland
Semi-improved Grassland
Marshy Grassland
Semi-improved Marshy Grassland
Swamp
Standing Water
Brackish Pool
Saltmarsh
Shingle
Dune Slack
Dune Grassland
Dune Heath
Dune Scrub
Open Dune
Hard Cliff
Soft Cliff
Coastal Grassland
Coastal Heathland
Sand/Mud

## Appendix 5 UK BAP Priority Habitats

UK Biodiversity Action Plan habitats (JNCC, 2011). Those in grey font were not identified in the 2024 habitat survey.

<b>Terrestrial and Freshwater UK BAP Priority Habitat</b>
Rivers (updated 2011)
Oligotrophic and Dystrophic Lakes
<b>Ponds</b>
Mesotrophic Lakes
Eutrophic Standing Waters
Aquifer Fed Naturally Fluctuating Water Bodies
Arable Field Margins
Hedgerows
<b>Traditional Orchards</b>
Wood-Pasture and Parkland (updated December 2011)
Upland Oakwood
Lowland Beech and Yew Woodland
Upland Mixed Ashwoods
Wet Woodland
<b>Lowland Mixed Deciduous Woodland</b>
Upland Birchwoods
Native Pine Woodlands
<b>Lowland Dry Acid Grassland</b>
Lowland Calcareous Grassland
Upland Calcareous Grassland
<b>Lowland Meadows</b>
Upland Hay Meadows
Coastal and Floodplain Grazing Marsh
<b>Lowland Heathland</b>
Upland Heathland
Upland Flushes, Fens and Swamps
Purple Moor Grass and Rush Pastures
Lowland Fens
<b>Reedbeds</b>
Lowland Raised Bog
Blanket Bog
Mountain Heaths and Willow Scrub
Inland Rock Outcrop and Scree Habitats
Calaminarian Grasslands
Open Mosaic Habitats on Previously Developed Land (updated July 2010)
Limestone Pavements
<b>Maritime Cliff and Slopes</b>
Coastal Vegetated Shingle
Machair
Coastal Sand Dunes

## Appendix 6 Distinctiveness and Strategic Importance values

The Distinctiveness and Strategic Importance values of UKHabs classification codes, summarised to include only those habitats found in Sark (Defra, 2024).

UKHabs Primary Code	Distinctiveness	Strategic Importance
G1 Acid grassland	High	High
G1a Lowland dry acid grassland	High	High
G1c Bracken	Medium	Medium
G3c Other neutral grassland	Medium	Medium
G4 Modified grassland	Low	Low
W1f Lowland mixed deciduous woodland	High	High
W1g Other broadleaved woodland	High	High
W1h Other woodland; mixed	Medium	Medium
W2c Other coniferous woodland	Low	Low
H1a5 Dry heaths; lowland	High	High
H3a Blackthorn Scrub	Medium	Medium
H3d Bramble Scrub	Medium	Medium
H3e Gorse Scrub	Medium	Medium
H3h Mixed Scrub	Medium	Medium
F2 Fen, marsh and swamp	High	High
F2b Purple moor grass and rush pasture	High	High
F2e Reedbeds	High	High
C1 Arable and horticulture	Low	Low
C1b5 Rye-grass and clover ley	Low	Low
C1c8 Arable fields pollen and nectar	Medium	Medium
C1d8 Other non-cereal crops	Medium	Medium
C1e Intensive orchard	Medium	Medium
U1 Built-up areas and gardens	Low	Low
U1c Artificial unvegetated unsealed surface	Low	Low
S1 Inland rock	Medium	Medium
S2a Maritime cliff and slope	High	High
S2a6 Soft rock sea cliffs	High	High
S3 Supralittoral sediment	High	High
S3a Sand dunes	High	High
R1g Other standing water	Medium	Medium
T1 Littoral Rock	High	High
T2 Littoral Sediment	High	High
T2h Beach	High	High



## Appendix 7 Habitats Directive Annex 1 Habitats

Habitats included within Annex 1 of the Habitats Directive which occur in the UK and for which one or more SAC is designated, are listed in the below table. Those habitats which are present in Sark have been highlighted in yellow.

<b>Marine, coastal and halophytic habitats</b>
1110 Sandbanks which are slightly covered by sea water all the time
1130 Estuaries
1140 Mudflats and sandflats not covered by seawater at low tide
1150 Coastal lagoons
1160 Large shallow inlets and bays
1170 Reefs
1180 Submarine structures made by leaking gases
1210 Annual vegetation of drift lines
1220 Perennial vegetation of stony banks
1230 Vegetated sea cliffs of the Atlantic and Baltic coasts
1310 Salicornia and other annuals colonising mud and sand
1320 Spartina swards ( <i>Spartinion maritimae</i> )
1330 Atlantic salt meadows ( <i>Glauco-Puccinellietalia maritimae</i> )
1340 Inland salt meadows
1420 Mediterranean and thermo-Atlantic halophilous scrubs ( <i>Sarcocornia fruticosa</i> )
<b>Coastal sand dunes and continental dunes</b>
2110 Embryonic shifting dunes
2120 Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ('white dunes')
2130 Fixed dunes with herbaceous vegetation ('grey dunes')
2140 Decalcified fixed dunes with <i>Empetrum nigrum</i>
2150 Atlantic decalcified fixed dunes ( <i>Calluno-Ulicetea</i> )
2160 Dunes with <i>Hippophae rhamnoides</i>
2170 Dunes with <i>Salix repens</i> ssp. <i>argentea</i> ( <i>Salicion arenariae</i> )
2190 Humid dune slacks
21A0 Machairs
2250 Coastal dunes with <i>Juniperus</i> spp.
2330 Inland dunes with open <i>Corynephorus</i> and <i>Agrostis</i> grasslands
<b>Freshwater habitats</b>
3110 Oligotrophic waters containing very few minerals of sandy plains ( <i>Littorelletalia uniflorae</i> )
3130 Oligotrophic to mesotrophic standing waters with vegetation of the <i>Littorelletea uniflorae</i> and/or of the <i>Isoëto-Nanojuncetea</i>
3140 Hard oligo-mesotrophic waters with benthic vegetation of <i>Chara</i> spp.
3150 Natural eutrophic lakes with <i>Magnopotamion</i> or <i>Hydrocharition</i> -type vegetation
3160 Natural dystrophic lakes and ponds
3170 Mediterranean temporary ponds
3180 Turloughs
3260 Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation
<b>Temperate heath and scrub</b>

4010 Northern Atlantic wet heaths with <i>Erica tetralix</i>
4020 Temperate Atlantic wet heaths with <i>Erica ciliaris</i> and <i>Erica tetralix</i>
<b>4030 European dry heaths</b>
4040 Dry Atlantic coastal heaths with <i>Erica vagans</i>
4060 Alpine and Boreal heaths
4080 Sub-Arctic <i>Salix</i> spp. scrub
<b>Sclerophyllous scrub (matorral)</b>
5110 Stable xerothermophilous formations with <i>Buxus sempervirens</i> on rock slopes (Berberidion p.p.)
5130 <i>Juniperus communis</i> formations on heaths or calcareous grasslands
<b>Natural and semi-natural grassland formations</b>
6130 Calaminarian grasslands of the <i>Violetalia calaminariae</i>
6150 Siliceous alpine and boreal grasslands
6170 Alpine and subalpine calcareous grasslands
6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates ( <i>Festuco-Brometalia</i> ), (note that this includes the priority feature "important orchid-rich sites").
6230 Species-rich <i>Nardus</i> grassland, on siliceous substrates in mountain areas (and submountain areas in continental Europe)
6410 <i>Molinia</i> meadows on calcareous, peaty or clayey-silt-laden soils ( <i>Molinion caeruleae</i> )
6430 Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels
<b>6510 Lowland hay meadows (<i>Alopecurus pratensis</i>, <i>Sanguisorba officinalis</i>)</b>
6520 Mountain hay meadows
<b>Raised bogs and mires and fens</b>
7110 Active raised bogs
7120 Degraded raised bogs still capable of natural regeneration
7130 Blanket bogs
7140 Transition mires and quaking bogs
7150 Depressions on peat substrates of the <i>Rhynchosporion</i>
7210 Calcareous fens with <i>Cladium mariscus</i> and species of the <i>Caricion davallianae</i>
7220 Petrifying springs with tufa formation ( <i>Cratoneurion</i> )
7230 Alkaline fens
7240 Alpine pioneer formations of the <i>Caricion bicoloris-atrofuscae</i>
<b>Rocky habitats and caves</b>
8110 Siliceous scree of the montane to snow levels ( <i>Androsacetalia alpinae</i> and <i>Galeopsietalia ladani</i> )
8120 Calcareous and calcshist screes of the montane to alpine levels ( <i>Thlaspietea rotundifolii</i> )
8210 Calcareous rocky slopes with chasmophytic vegetation
8220 Siliceous rocky slopes with chasmophytic vegetation
8240 Limestone pavements
8310 Caves not open to the public
8330 Submerged or partially submerged sea caves
<b>Forests</b>

9120 Atlantic acidophilous beech forests with Ilex and sometimes also Taxus in the shrublayer (Quercion roburi-petraeae or Ilici-Fagenion)
9130 Asperulo-Fagetum beech forests
9160 Sub-Atlantic and medio-European oak or oak-hornbeam forests of the Carpinion betuli
9180 Tilio-Acerion forests of slopes, screes and ravines
9190 Old acidophilous oak woods with Quercus robur on sandy plains
91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles
91C0 Caledonian forest
91D0 Bog woodland
91E0 Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae)
91J0 Taxus baccata woods of the British Isles



## Appendix 8 Conversion of Phase 1 to UKHabs

The UKHabs primary codes for the Phase 1 habitat classifications. Some classifications are like-for-like in a Sark context, whereas others may be split into several UKHabs categories.

Phase 1	No.	UKHabs	No.
Amenity Grassland	47	G1 Acid grassland	1
		G4 Modified grassland	46
Arable Land	16	C1 Arable and horticulture	3
		C1c8 Arable fields pollen and nectar	12
		C1d8 Other non-cereal crops	1
Arable Land short term ley	3	C1b5 Rye-grass and clover ley	3
Bare Ground	13	G4 Modified grassland	3
		S2a Maritime cliff and slope	9
		U1c Artificial unvegetated unsealed surface	1
Coastal Grassland	352	G1 Acid grassland	5
		G1a Lowland dry acid grassland	1
		G4 Modified grassland	7
		S2a Maritime cliff and slope	339
Coastal Heathland	84	Ha15 Dry heaths; lowland	84
Continuous Bracken	90	G1c Bracken	90
Dense Scrub	386	H3a Blackthorn Scrub	44
		H3d Bramble Scrub	11
		H3e Gorse Scrub	36
		H3h Mixed Scrub	295
Hard Cliff	175	S2a Maritime cliff and slope	175
Improved Grassland	213	G1 Acid grassland	1
		G4 Modified grassland	212
Intertidal Rock and Boulders	508	T1 Littoral Rock	508
Intertidal Sand	17	T2h Beach	17
Intertidal Shingle	48	T2 Littoral Sediment	48
Parkland	10	G4 Modified grassland	3
		U1 Built-up areas and gardens	6
		W1g Other broadleaved woodland	1
Plantation Woodland	15	C1e Intensive orchard	5
		G3c Other neutral grassland	1
		G4 Modified grassland	9
Planted Broadleaved Woodland	27	W1f Lowland mixed deciduous woodland	3
		W1g Other broadleaved woodland	24
Planted Coniferous Woodland	8	W2c Other coniferous woodland	8
Planted Mixed Woodland	12	W1h Other woodland; mixed	12
Quarry	2	S1 Inland rock	2
Rock	283	S2a Maritime cliff and slope	283
Sand / Mud	1	S3a Sand dunes	1
Semi-improved Grassland	56	G1 Acid grassland	3
		G1a Lowland dry acid grassland	1
		G3c Other neutral grassland	26

		G4 Modified grassland	26
Semi-improved Marshy Grassland	2	F2b Purple moor grass and rush pasture	2
Semi Natural Broadleaved Woodland	72	W1g Other broadleaved woodland	72
Shingle	3	S3 Supralittoral sediment	3
Soft Cliff	39	S2a6 Soft rock sea cliffs	39
Standing Water	6	F2 Fen, marsh and swamp	1
		R1g Other standing water	5
Swamp	1	F2e Reedbeds	1
Tall Ruderal	18	C1 Arable and horticulture	2
		G4 Modified grassland	16
Unimproved Grassland	1	G1a Lowland dry acid grassland	1

## Appendix 9 Conversion of UKHabs to Phase 1

The Phase 1 classification for all UKHabs primary codes identified in Sark. Some classifications are like-for-like in a Sark context, whereas others may be split into several Phase 1 categories.

UKHabs	No.	Phase 1	No.
C1 Arable and horticulture	14	Arable Land	12
		Tall Ruderal	2
C1b5 Rye-grass and clover ley	3	Arable Land short term ley	3
C1c8 Arable fields pollen and nectar	1	Arable Land	1
C1d8 Other non-cereal crops	3	Arable Land	3
C1e Intensive orchard	5	Plantation Woodland	5
F2 Fen, marsh and swamp	1	Standing Water	1
F2b Purple moor grass and rush pasture	2	Semi-improved Marshy Grassland	2
F2e Reedbeds	1	Swamp	1
G1 Acid grassland	10	Amenity Grassland	1
		Coastal Grassland	5
		Improved Grassland	1
		Semi-improved Grassland	3
G1a Lowland dry acid grassland	3	Coastal Grassland	1
		Semi-improved Grassland	1
		Unimproved Grassland	1
G1c Bracken	90	Continuous Bracken	90
G3c Other neutral grassland	27	Plantation Woodland	1
		Semi-improved Grassland	26
G4 Modified grassland	322	Amenity Grassland	46
		Bare Ground	3
		Coastal Grassland	7
		Improved Grassland	212
		Parkland	3
		Plantation Woodland	9
		Semi-improved Grassland	26



		Tall Ruderal	16
H1a5 Dry heaths; lowland	84	Coastal Heathland	84
H3a Blackthorn Scrub	44	Dense Scrub	44
H3d Bramble Scrub	11	Dense Scrub	11
H3e Gorse Scrub	36	Dense Scrub	36
H3h Mixed Scrub	295	Dense Scrub	295
R1g Other standing water	5	Standing Water	5
S1 Inland rock	2	Quarry	2
S2a Maritime cliff and slope	806	Bare Ground	9
		Coastal Grassland	339
		Hard Cliff	175
		Rock	283
S2a6 Soft rock sea cliffs	39	Soft Cliff	39
S3 Supralittoral sediment	3	Shingle	3
S3a Sand dunes	1	Sand / Mud	1
T1 Littoral Rock	508	Intertidal Rock and Boulders	508
T2 Littoral Sediment	48	Intertidal Shingle	48
T2h Beach	17	Intertidal Sand	17
U1 Built-up areas and gardens	6	Parkland	6
U1c Artificial unvegetated unsealed surface	1	Bare Ground	1
W1f Lowland mixed deciduous woodland	3	Planted Broadleaved Woodland	3
W1g Other broadleaved woodland	97	Parkland	1
		Planted Broadleaved Woodland	24
		Semi Natural Broadleaved Woodland	72
W1h Other woodland; mixed	12	Planted Mixed Woodland	12
W2c Other coniferous woodland	8	Planted Coniferous Woodland	8

## Appendix 10 Hierarchy of UKHabs classifications identified in Sark

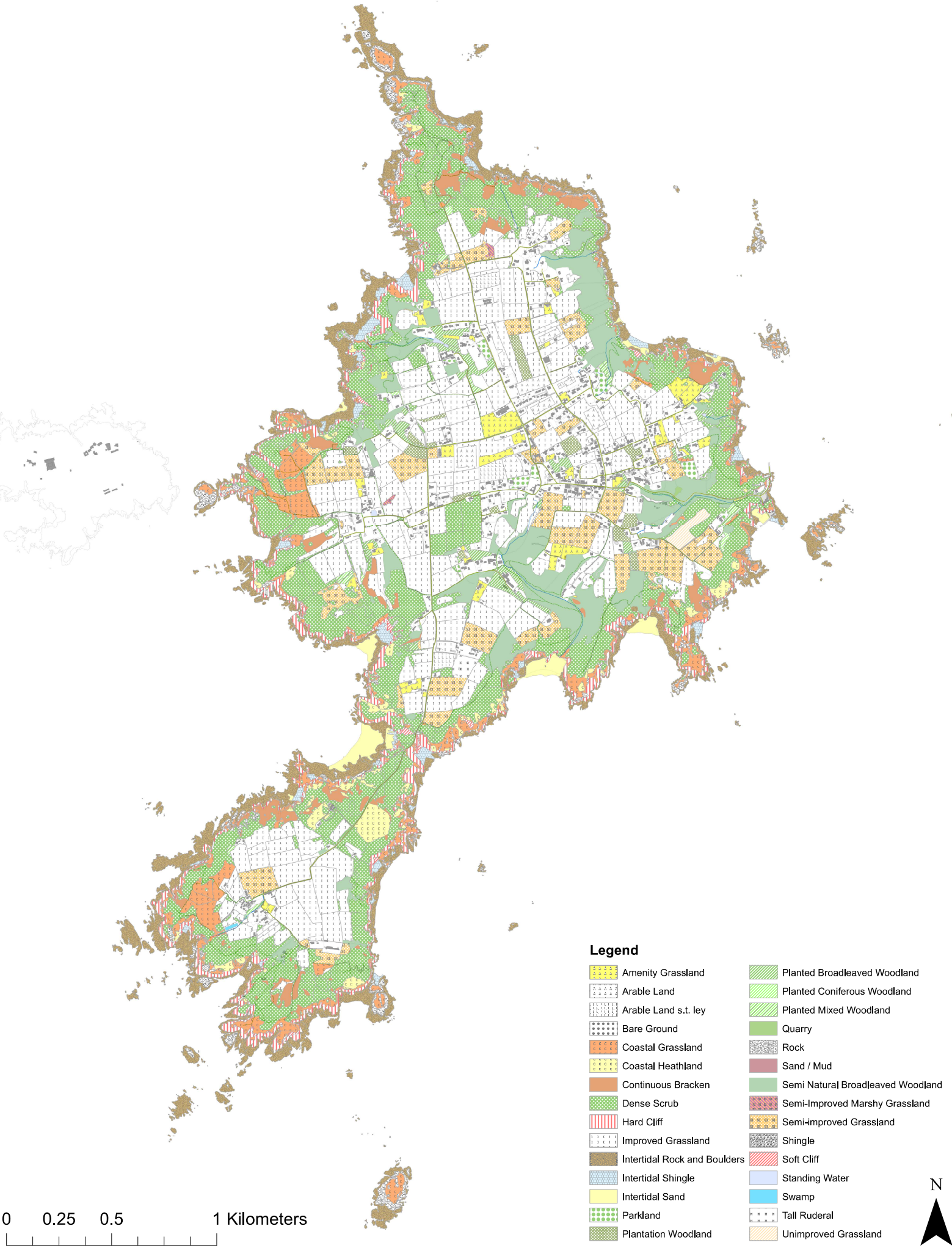
Level 2 code	Level 2 Label	Level 3 code	Level 3 Label	Level 4 code	Level 4 Label	Level 5 code	Level 5 Label
g	Grassland	g1	Acid grassland	g1a	Lowland dry acid grassland		
				g1c	Bracken		
		g3	Neutral grassland	g3c	Other neutral grassland		
		g4	Modified grassland				
w	Woodland and forest	w1	Broadleaved mixed and yew woodland	w1f	Lowland mixed deciduous woodland		
				w1g	Other woodland; broadleaved		
				w1h	Other woodland; mixed		
		w2	Coniferous woodland	w2c	Other coniferous woodland		
h	Heathland and shrub	h1	Dwarf shrub heath	h1a	Lowland Heathland	H1a5	Dry heaths; lowland
		h3	Dense scrub	h3a	Blackthorn scrub		
				h3d	Bramble scrub		
				h3e	Gorse scrub		
				h3h	Mixed scrub		
f	Wetland	f2	Fen marsh and swamp	f2b	Purple moor grass and rush pastures		
				f2e	Reedbeds		
c	Cropland	c1	Arable and horticulture	c1b	Temporary grass and clover leys	c1b5	Rye-grass and clover ley
				c1c	Cereal crops	c1c8	Arable fields pollen and nectar
				c1d	Non-cereal crops	c1d8	Other non-cereal crops
				c1e	Intensive orchards		

u	Urban	u1	Built-up areas and gardens	u1c	Artificial unvegetated, unsealed surface		
s	Sparsely vegetated land	s1	Inland rock				
		s2	Supralittoral Rock	s2a	Maritime cliff and slopes	s2a6	Soft rock sea cliffs
		s3	Supralittoral Sediment	s3a	Coastal sand dunes		
r	Rivers and lakes	r1	Standing open water and canals	r1g	Other sanding water		
t	Marine inlets and transitional waters	t1	Littoral Rock				
		t2	Littoral Sediment	t2h	Beach		

2024 Sark Habitat Survey

APPENDIX TWO

Phase 1 classifications

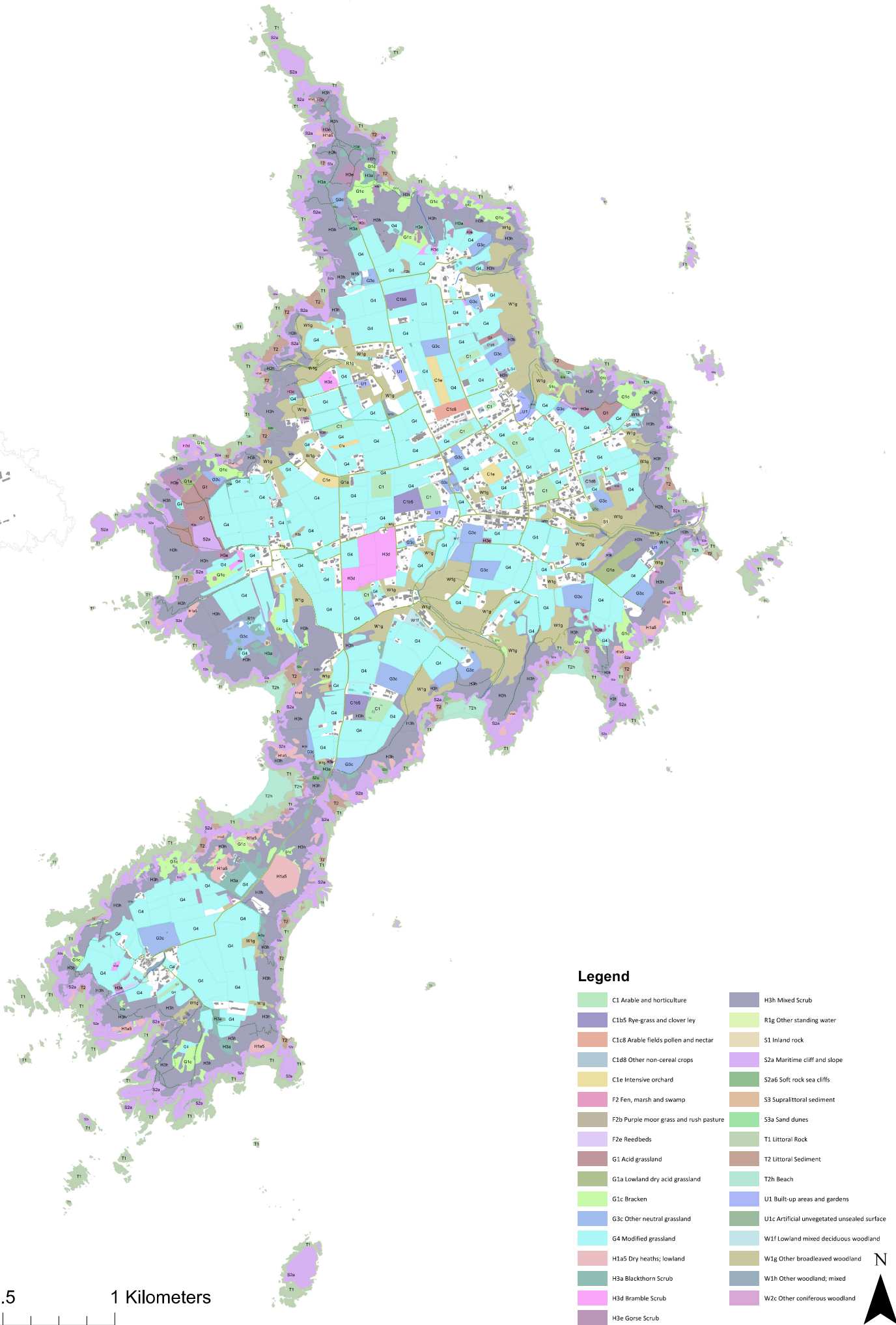




# 2024 Sark Habitat Survey

## APPENDIX TWO

### UKHabs classifications





**AGRICULTURE, ENVIRONMENT & SEA FISHERIES  
COMMITTEE**

**Report with Proposition to Christmas Chief Pleas, 21st January 2026**

**MARINE PROTECTED AREA**

The Agriculture, Environment and Sea Fisheries Committee is considering the creation of a Marine Protected Area (MPA) around Sark to safeguard its rich marine life, support sustainable fisheries, and enhance the island's environmental reputation. Establishing an MPA would help mitigate threats such as climate change, pollution, and potential external fishing pressures, while securing Sark's marine heritage, boosting eco-tourism, and reinforcing the island's identity as a global leader in sustainable marine stewardship in much the same way as the Dark Skies designation. These proposals have been developed with the support of La Société Sercquaise and the Blue Marine Foundation.

Sark's waters host a wealth of biodiversity including eelgrass beds, reefs, seabirds, and marine mammals. Our waters are already managed under strict regulations that ban dredging, restrict trawling, enforce closed seasons for lobsters, crabs and ormers, and protect other key species. Additional controls on netting are also being proposed as a separate Report with Proposition at Item 13. The proposed MPA, likely classified as "Highly Protected," would recognise current sustainable practices, and promote low-impact fishing, recreation, and tourism.

With the support of the Blue Marine Foundation, a review of existing legislation, a habitat map, and initial community consultations have been done to develop a roadmap toward formal designation and international recognition. These supporting documents, including the Vision Document and Legislation Review are appended to this Report. For the Habitat Mapping document, see Item 12 Appendix Two.

The Committee is proposing to bring a proposition for a formal Marine Protected Area for Sark to a future meeting of Chief Pleas and would welcome further feedback and comments from members of Chief Pleas and the Community.

The Proposition here asks Chief Pleas to agree the appended Vision Document, which provides a roadmap for the designation process.

**Appendices:**

1. Vision Document: '*Celebrating Sark's Sea: A Proposal to Secure our Marine Life and a Unique Way of Life at Sea*'
2. Policy & Legislation Review

**Proposition -**

**That Chief Pleas agrees to the vision document entitled “Celebrating Sark’s Sea: A proposal to secure our marine life and a unique way of life at sea”, and directs the Agriculture, Environment & Sea Fisheries Committee to action the further necessary consultation in line with the vision document.**

**Conseiller Helen Plummer  
Chairman, Agriculture, Environment & Sea Fisheries Committee**

## MARINE PROTECTED AREA: BACKGROUND INFORMATION

The proposal for an MPA is supported by a number of background documents, which have been prepared with the support of La Société Sercquaise and the Blue Marine Foundation. This work has been undertaken at no cost to the island. These documents include a Vision document entitled '*Celebrating Sark's Sea: A proposal to secure our marine life and a unique way of life at sea*'; a Policy & Legislation Review, and a Marine Habitat Map. These documents are summarised below.

### **Vision Document: *Celebrating Sark's Sea: A proposal to secure our marine life and a unique way of life at sea* (Appendix 1)**

The vision document sets out the rationale for establishing an MPA in Sark's waters, recognising the diverse range of habitats, and the importance of the sea to Sark not only from an environmental and economic perspective, but also culturally in defining Sark's sense of place as an island with a strong maritime heritage.

The Vision document sets out what a marine protected area is and what it would mean in Sark. It proposes the size of the MPA and some of the management measures, the majority of which are already in place.

The document also provides a roadmap with timelines for establishing the MPA and formal recognition.

### **Policy and Legislation Review (Appendix 2)**

The Policy and Legislation Review identifies the policies and legislation that govern the management of Sark's marine environment, detailing the island's governance structure, legal framework, and international commitments. As a self-governing jurisdiction within the Bailiwick of Guernsey, Sark has authority over its 0–3 nautical mile waters and has implemented strong fisheries regulations while extending some Bailiwick-wide laws as needed.

The Vision for Sark, adopted in Chief Pleas in 2013 included a task to 'Develop a marine spatial plan to regulate developments in territorial waters'<sup>1</sup>. This sets a precedent for Marine Spatial Planning, an exercise that typically includes the scoping of Marine Protected Areas (MPAs).

As this review notes, Sark's existing fisheries legislation, including closed seasons and restrictions on certain practices and types of gear, is already very good and, subject to tighter management on trawling, would be equivalent to a Level 2 or "Highly Protected" MPA or a Level 3, "Lightly Protected" without any additional controls. The review also highlights that while Sark's small scale allows for flexible, consultative

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<sup>1</sup> 'A Vision for Sark', agreed at Easter meeting of Chief Pleas, 10 April 2013. Found at <https://img1.wsimg.com/blobby/go/5ff82f30-38d7-4ae5-98f1-e93b4ee65820/downloads/59d8fe99-4607-4757-af4e-aab181da20b9/Vision%20for%20Sark.pdf?ver=1737726161811>

governance, more formalised structures could enhance consistency and long-term benefits. Key recommendations in the Review include clarifying sea boundaries, assessing sewage impacts, developing an MPA aligned with international biodiversity targets, strengthening fisheries management (particularly around trawling) and seeking international recognition of any future MPA.

### **Habitat Map (Appendix 3)**

The report outlines the methodology and findings of a marine habitat mapping project aimed at supporting the development of Sark's Marine Protected Areas. The report provides a detailed map of the marine habitats and biotopes, both intertidally and sub-tidally for Sark, extending from the Highest Astronomical Tide (HAT) to the 12 nautical mile limit (or median).

Habitat classification was based on the Joint Nature Conservation Committee (JNCC) and European Nature Information System (EUNIS) biotope hierarchy. This uses exposure, biozonation and substrate properties in conjunction with biological and other parameters to categorise marine habitats into a structured biotope classification. To assist with the ground-truthing and consultation, broader, more descriptive habitat groups (e.g. 'kelp forest') were used as they are better suited for interpretation.

The results of the mapping were ground-truthed against datasets collected through field mapping, diver surveys or scientific sampling. The habitats and species recorded in the ground-truth datasets were compared to the habitat map to test its accuracy and subjected to public consultation.

This study will promote a greater understanding of Sark's marine environment and aid the future management of Sark waters.

## **Celebrating Sark's Sea**

**Vision: A proposal to secure our marine life and  
a unique way of life at sea**

### **Rationale**

The Agriculture, Environment and Sea Fisheries Committee is exploring the idea of creating a Marine Protected Area (MPA) for the waters around Sark. These proposals have been developed with the support of La Société Sercquaise and the Blue Marine Foundation.

In 2011, Sark became the world's first Dark Sky Island, recognised for its exceptional lack of light pollution. The island embraced this award, seeing it as a way to boost Sark's economy through tourism, while also celebrating its commitment to the environment. Designating a Marine Protected Area around Sark could build on that success, helping the island safeguard its waters against future environmental and human pressures, protecting precious marine life, celebrating our sustainably caught seafood, and putting Sark on the map as a global leader in marine conservation.

### **The Island's Marine Environment**

Sark has over 22 kilometres of coastline, featuring cliffs, caves, bays, numerous rocky islets, and both sandy and pebble beaches. The surrounding waters host eel grass beds, reefs, sheer underwater walls, gullies, and numerous shipwrecks, from relics of the Second World War to older examples such as the American cargo vessel *Sapor*, lost in 1817.

These seas are home to a diverse range of marine life. Among the more distinctive species, are the sunset cup coral, the anemone prawn, the black-face blenny, and the ormer — a shellfish found only in the Channel Island region and the nearby French coast. The coastline also supports many seabirds, including gulls, fulmars, razorbills, gannets, oystercatchers, and puffins, as well as the largest guillemot colonies in the Channel Islands. Offshore, creatures such as dolphins, seals, and porpoises are regular visitors, with minke and pilot whales, basking sharks, tuna, and sunfish occasionally passing through, feeding in the rich waters surrounding the islands.

This diverse wildlife and the range of habitats are not only central to Sark's natural heritage, but also worth protecting for the health of local fisheries, the enjoyment of residents and visitors, the wider environmental benefits, and the economic opportunities they create.

Current fishing regulations include a ban on parlour pots (pots from which the catch cannot escape), a ban on dredging (scallops can only be collected by divers), a five-month closed season for both scallop diving and also for lobster and crab potting to



sustain stocks during the winter, and full protection for crawfish. These regulations already make Sark waters some of the best managed in Europe, whilst shellfish fisheries (particularly crab, lobster and crawfish) are suffering in Cornwall, Devon & Dorset.

These foundations place Sark in an ideal position to make the necessary changes toward formally designating its waters as a Marine Protected Area, bringing a level of international recognition to its superb marine environment just as the Dark Skies designation drew attention to its night skies.

### **What is a Marine Protected Area?**

A Marine Protected Area (MPA) is a specific area of the sea where fishing and other extractive and / or depositional activities are limited or restricted in order to protect species, habitats, cultural heritage, and / or entire ecosystems.

MPAs are often grouped into four categories:<sup>1</sup>

1. **Fully Protected** – No extractive (taking anything out), destructive or depositional (putting anything in) activities are permitted.
2. **Highly Protected** – Only small-scale, low-impact use and extractive activities are permitted.
3. **Lightly Protected** – Some biodiversity protection is in place, but moderate extractive or potentially damaging activities are permitted.
4. **Minimally Protected** – Most extractive and high-impact activities are permitted, but some conservation benefits are still achieved.

For Sark, the designation of an MPA would provide a way to continue to sustainably manage the marine resources, habitats and species of the island in perpetuity as well as providing international recognition. Locally supported MPAs help make sure that different uses of the sea can coexist without causing harm, while protecting wildlife, supporting sustainable fisheries, preserving cultural sites, and creating opportunities for sustainable tourism and other economic benefits.

### **What would an MPA in Sark permit/prohibit?**

Due to strong existing fisheries legislation, Sark's waters are already close to being classified as "Highly Protected" (the second category above). However, to do so, legislation could be amended to prohibit trawling within the whole MPA not just in inshore waters. Due to the location of key habitats, and the regulatory jurisdiction of the Government of Sark, this Vision suggests for an MPA to encompass the **full extent of Sark's three (3) nautical mile** marine limit.

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<sup>1</sup> Kirsten Grorud-Colvert et al., The MPA Guide: A framework to achieve global goals for the ocean. Science 373, eabf0861 (2021). DOI: 10.1126/science.abf0861

Such an MPA would provide international recognition for management measures that are already in place, while introducing additional measures to restrict trawling. The below table outlines the activities which would be permitted or prohibited within the proposed MPA, and where relevant legislation change is needed:

Activity	Current Status	Status within MPA	Legislation change needed?
Low-impact fishing methods (well managed potting, static netting, hook and line and diving).	Permitted	Permitted	No
All sailing, navigation and current use, with designated anchorages and mooring areas.	Permitted	Permitted	No
All maintenance works to allow safe access and use of the harbour.	Permitted	Permitted	No
Dredge fishing	Prohibited	Prohibited	No
Trawl fishing <sup>2</sup>	Partially Prohibited	Prohibited	Yes
Development which undermines the current favourable conservation status of marine habitats	Permitted	Subject to management plan	No

The creation of an MPA can help Sark secure its current uses of the sea, including existing recreational use and commercial low-impact fishing.

In the future there is potential to designate small no-fishing areas **on an experimental & temporary basis** in full collaboration & agreement with current users (e.g. fishers/anglers/boat users). Similar experiments have increased lobster numbers and sizes in Lundy, England, leading to increased fecundity in the brood stock from relatively small no fishing zones.

### **Work so far**

At the start of 2025, La Société Sercquaise and Sark's Agriculture, Environment and Sea Fisheries Committee approached Blue Marine Foundation to explore opportunities for creating an MPA within Sark's waters. During these discussions, it became clear that Sark's existing fisheries regulations, and current non-fishing uses (e.g. navigation, moorings, anchorages and ports) provide for a healthier marine environment than many UK and European MPAs. In practice, this means that Sark's sea area is already well protected, sometimes referred to as a '*de-facto* MPA'.

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<sup>2</sup> It is understood that no vessels based in Sark currently use any mobile fishing gear. There are a small number of Guernsey based vessels that are recorded as using mobile gear (trawls) inside a very small portion of Sark's 0 to 3 NM zone

Building on this, a full review of the local and international policies and legislation applicable to Sark's marine territory was undertaken by Terra Mare Ltd. for Blue Marine Foundation. This review clarifies what is possible under current regulations in relation to the designation of an MPA, as well as identifying gaps and outlining the steps needed to formally designate an MPA. A habitat map was also prepared, highlighting exactly where important marine habitats are located. This map is being shared with the local community for feedback and consultation.

## **Moving forward – a roadmap**

Once complete, the people and Government of Sark can use this information to decide if the Island should formally recognise its waters as an MPA. If agreed, Sark will be well positioned to action this process through the following stages of a roadmap:

1. Ground truthing habitat data to further confirm that estimations of habitat locations are correct including targeted stakeholder engagement. (Oct 2025)
2. Information report presented to Christmas Chief Pleas including Vision Document, Policy and Legislation Review, and Habitat Map. (Jan 2026)
3. Further stakeholder engagement to agree conservation objectives and develop a management and monitoring plan. (Jan – Mar 2026)
4. Report with Proposition to designate an MPA brought to Easter Chief Pleas. (Apr 2026)
5. Draft appropriate changes to existing legislation/draft new legislation. (Apr – Jun 2026)
6. Apply for any MPA to be registered with an international body, such as the International Union for the Conservation of Nature, IUCN) or Oslo Paris Accord (OSPAR) for the Conservation of North-East Atlantic).<sup>3</sup> (Jul – Oct 2026)

Achieving this would not only mark the island as a leader in marine conservation but would also help Sark to attract visitors and support local economic activity. From a conservation perspective, this work provides a framework for working with local fishermen and other stakeholders to identify some experimental areas that could benefit from additional temporary (experimental) or permanent protection (such as a fully protected area). Blue Marine Foundation would support any such provisions with scientific monitoring and engagement.

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<sup>3</sup> These bodies have no official legal status over any registration/listing by Sark, but offer international recognition of Sark). International conservation bodies are calling for 30% of land and sea protection by 2030. This initiative will allow for Sark to achieve this target for the seas.

## **Risks to the marine environment**

Sark's marine environment benefits from regulated low-impact fishing, which has helped maintain healthy shellfish stocks and support local livelihoods. However, these regulations only cover fishing activities, leaving other potential threats largely unregulated in their threats to marine biodiversity. Furthermore, if unsustainable fishing activities by non-Sark vessels were to encroach into Sark waters, an MPA would provide legal protection and therefore a threat of litigation against any breaches to the MPA.

Climate change poses a growing risk, as rising ocean temperatures and more frequent storms can affect species distribution, reproduction, and the overall health of marine habitats. Coastal development is another concern, with infrastructure expansion potentially leading to habitat loss, increased pollution, and changes in water flow that can harm marine life.

Pollution from land-based activities can also impact water quality and the organisms that depend on it, while invasive species may disrupt the natural balance by outcompeting native species. Even with current fisheries management, there remains the potential for overfishing if regulations are weakened or new methods or fishing gears are introduced without careful oversight.

By formally designating an MPA, Sark can address these risks comprehensively, ensuring long-term protection and sustainability of its marine environment and small local fishing fleet, whilst securing current use and the unique nature of island life.

## **Conclusion**

Sark's waters are already well managed for nature conservation and local people. Recognising the controls that already exist as a formal Marine Protected Area would add a new dimension to the island's identity, positioning it as a world-class leader in marine conservation. This could create opportunities to boost tourism through marine leisure activities, conservation and scientific monitoring, and the promotion of sustainable seafood.

Officially designating a Marine Protected Area would also provide a legal framework to ensure sensitive areas remain protected from potentially harmful activities in the future, such as large-scale dredging, trawling, coastal development, or offshore energy development projects.

By taking this step, Sark would be safeguarding its marine environment for future generations, supporting local livelihoods, and strengthening its reputation as a place where people, nature, and sustainable development can thrive together.

[illegible]



# **A Policy and Legislation Review for Sark's Marine Environment**

**Prepared for**

**Blue Marine Foundation**

**Government of Sark**

**23 August 2025**



Version	Date	Author	Summary	Approval
1.0	21/07/25	GM	Draft report	GM
1.1	25/07/25	JLS/GM	Draft report	GM
2.0	05/08/25	GM/FW	Final Draft report	GM
2.1	23/08/25	GM/PC	Final report	GM

## Executive Summary

This document provides a comprehensive review of the policy and legislative framework underpinning the current management of Sark's Waters. It outlines the governance, international commitments, legislation, and policy relevant to managing the marine environment and maritime activities.

Sark operates as a self-governing territory with its own legislature, Chief Pleas, and administration, whilst being part of the Bailiwick of Guernsey together with the Islands of Guernsey, Herm and Alderney. This arrangement has allowed the Chief Pleas to implement Bailiwick wide legislation, or Sark specific legislation if appropriate.

In the marine environment and maritime space, Sark specific legislation has focused on the 0 – 3 nautical mile (NM) area around the Island and concentrated on Harbours, Transport and Fisheries. The fisheries legislation, in particular, provides extremely robust measures to manage activities related to fishing gear types and species retained.

Chief Pleas has considered further marine management for over a decade with additional impetus following the extension of its territorial waters to 12 NM in 2019 including marine spatial planning and marine protected areas.

Sark's current approach balances pragmatic governance with resource limitations, extending Bailiwick-wide legislation where necessary. The community's size allows for consultative, informal agreements, though these may lack formal recognition and longevity, and thus failing to maximise the potential benefits.

This legislation and policy report aims to support future policy development in respect of Marine Spatial Planning and Marine Protected Areas and makes several recommendations in this regard including:

1. Formal agreement on territorial sea boundaries;
2. Assessment of sewage disposal impacts on marine habitats and water quality to inform treatment improvements;
3. Development of MPAs considering international biodiversity goals (e.g., CBD 30x30 target), with consultations on high and medium protection areas based on habitat maps;
4. Consideration of fisheries management measures, especially regarding mobile gear;
5. Formal designation of MPAs through international mechanisms such as OSPAR, CBD, or UNEP-WCMC to maximize recognition.

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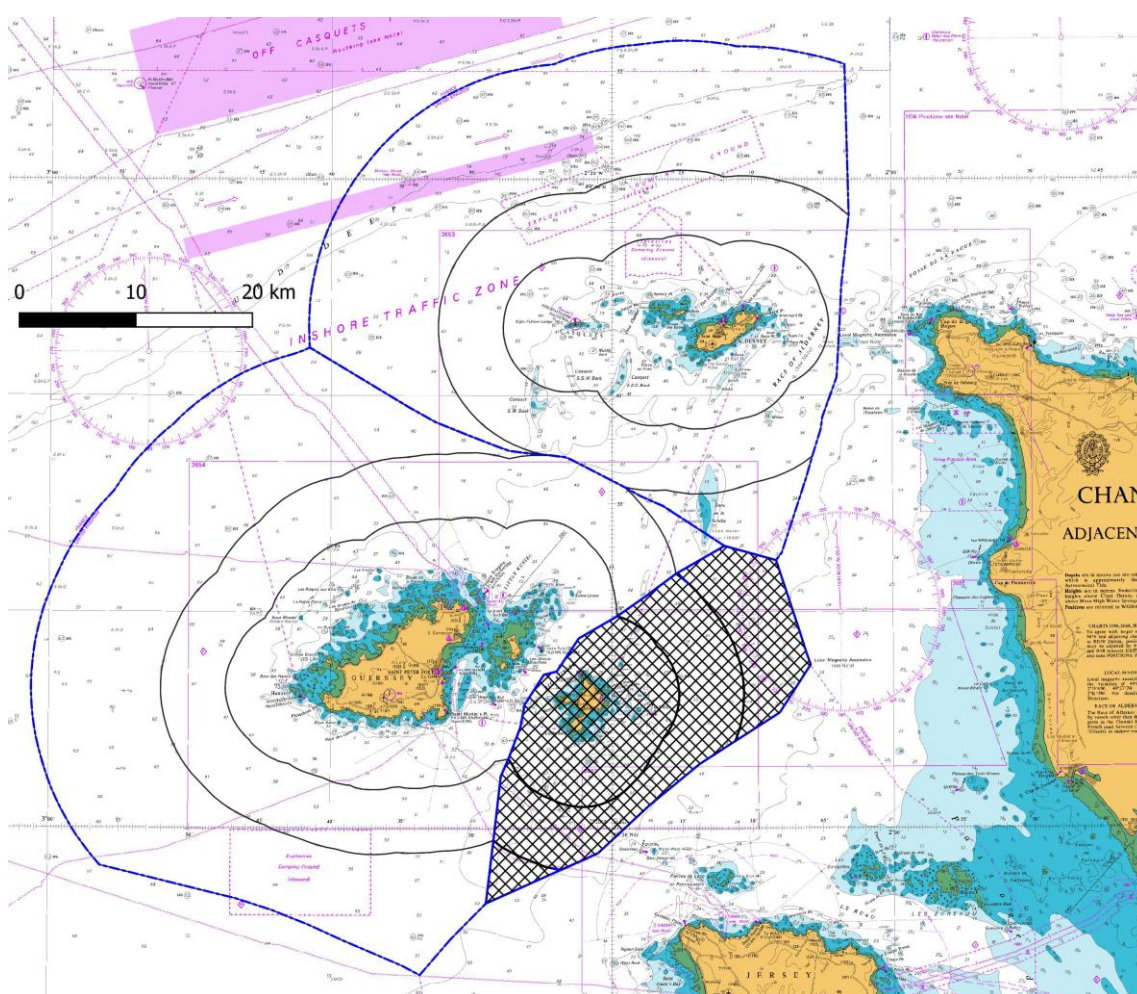
**Figure 1.** Bailiwick of Guernsey Waters showing 3, 6 and 12 NM (or median) limits with Sark Waters (hatched)



## 1. Introduction

### Background

The Island of Sark, part of the Bailiwick of Guernsey, is situated in the Normano-Breton Gulf in the southern part of the English Channel. Sark has an approximate area of 6.6 km<sup>2</sup> (including intertidal area and offshore rocks)<sup>1</sup> and consists of Greater Sark, Little Sark (connected to each other by a narrow isthmus known as La Coupeé) and Brecqhou (Figure 1). Sark is approximately 11.5 km east of Guernsey and 37.5 km to the west of the Cherbourg peninsula in France. The smaller, privately owned island of Brecqhou is separated from Great Sark by the narrow Le Gouliot Channel. Sark's waters cover approximately 430 km<sup>2</sup><sup>2</sup>



**Figure 1.** Bailiwick of Guernsey Waters showing 3, 6 and 12 NM (or median) limits with Sark Waters (hatched).

<sup>1</sup> Terrestrial area (above HW) 5.165km<sup>2</sup>; Intertidal 0.823km<sup>2</sup>; offshore rocks 0.663km<sup>2</sup>

<sup>2</sup> Sark Territorial Waters (including land) = 429.379 km<sup>2</sup>. 0-3 = 159.783 km<sup>2</sup> (37.3%); 3-6 km<sup>2</sup> = 166.166 km<sup>2</sup> (38.7%); 6-12 NM = 103.430 km<sup>2</sup> (24%).

Sark's territorial waters were originally three nautical miles before being extended to 12 nautical miles (NM) (or median line) in July 2019. At that time the chairman of the Policy and Finance Committee, Conseiller Peter La Trobe-Bateman stated:

*'The expansion of the area of Sark's territorial sea is a significant development which gives us more rights and control over the marine environment adjacent to us. We, together with Guernsey and Alderney, recognise, value and respect the sea and the opportunities provided by its natural resources. The seas around us are an important part of our identity as an island and as islanders and it makes sense that we will now expand our legislative competence to the 12 nm limit. The view from our coast will not be altered by this change in designation of the sea, but it is important to our economic outlook and our longer-term vision to manage our seas effectively and responsibly.'*<sup>3</sup>

Sark's territorial sea is adjacent to Guernsey waters to the west and northwest, with Alderney to the north, France to the east and Jersey to the southeast.

In common with other British Crown Dependencies, Sark is considered to be part of the British Islands but not within the United Kingdom; nor is it a sovereign state. His Majesty Charles III is King of Sark and the Crown, through the UK authorities, retains responsibility for Sark's defence and international representation. The Crown is advised on matters relating to the island by the UK Ministry of Justice (MoJ) through the Justice Secretary and Lord Chancellor.

Sark forms part of the Bailiwick of Guernsey and, except in matters of criminal law, Guernsey can only legislate for Sark with Chief Pleas' consent. It should also be noted that Orders in Council, the mechanism of extending UK legislation to Crown Dependencies, also applies to Sark.

As an independent self-governing territory Sark has its own legislature, judicial system and administration. The unicameral legislature, Chief Pleas, is also the Island's government.

## Marine Policy

Policy and subsequent legislation relating to fishing, harbours and maritime transport have, given the importance and identity to Sark, long been in place. Policy matters that include wider marine management, such as Marine Spatial Planning, are a relatively new consideration.

In 2012/3 Chief Pleas published an overarching policy document<sup>4</sup> that reflected the views of the population of Sark and intended to connect the workstreams of the various Committees as well as streamlining a corporate view of the way forward. That document states three policy goals in its section on land ownership, use and planning that are relevant to a Marine Spatial Plan (MSP) namely: -

- Develop a Marine Spatial Plan to regulate developments in territorial waters;

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<sup>3</sup> [Bailiwick of Guernsey's territorial seas will be extended on 23 July 2019 - States of Guernsey](#)

<sup>4</sup> [Vision for Sark.pdf](#)

- Establishes a planning system that, *inter alia*, encourages waste management techniques that reduce harmful impacts on the land and marine environment;
- Regulate environmentally and commercially effective marine energy solutions.

In 2013 the Inaugural Economic Policy for Sark<sup>5</sup> set out potential future commercial initiatives that included the development of harbour and port marine leisure facilities and additional moorings at Creux and Maseline harbours, Grève de la Ville and Havre Gosselin. The report also suggests ensuring control exists over fisheries in the territorial waters (0 – 3 NM at that time) in order to consider ways of further expanding diving, fishing and marine tourism.

Following discussions between Blue Marine Foundation, Government of Sark and La Société Sercquaise, it was agreed that, in order to further progress the possibility of Marine Protected Areas and Marine Spatial Planning in Sark, several building blocks would be required including a legislation and policy review and a marine habitat map.

This legislation and policy review, prepared for Chief Pleas, aims to support the process by identifying and summarising the relevant international agreements, legislation and policy frameworks that will impact on any future MSP and potential Marine Protected Areas (MPAs).

This review has been undertaken as a combination of a desk top study, literature review and consultation with key stakeholders.

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<sup>5</sup> [Kniveton reports - Inaugural Economic Policy f.pdf](#)

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## 2. Marine Spatial Planning and Marine Protected Areas.

Before setting out the policy and legislative framework in Sark, it may be useful to provide background information on Marine Spatial Planning (MSP) and Marine Protected Areas (MPAs). Both terms are widely used and accepted in marine management but have been interpreted in differing ways; this can lead to confusion about their use. A brief summary is given here and further details on both these concepts can be through the Blue Marine Foundation website.<sup>6</sup>

### Marine Spatial Planning

Marine Spatial Planning is a practical way to create and establish a rational organisation of the use of marine space and the interaction between its uses. It has been defined by UNESCO<sup>7</sup> as:

*“A public process of analysing and allocating the spatial and temporal distribution of human activities in marine areas to achieve ecological, economic, and social objectives that usually have been specified through a political process.”<sup>8</sup>*

Characteristics of marine spatial planning include it being ecosystem-based, area-based, integrated, adaptive, strategic, and participatory.

**Table 1.** Components of Marine Spatial Planning

Purpose	Process
To create a more rational use of marine space and manage the interactions among its uses. It seeks to balance the demands for development with the need to protect the environment, ensuring sustainable use of marine resources.	To involve multiple stakeholders, including energy, industry, government, conservation, and recreation sectors, using maps to create a comprehensive picture of a marine area, identifying where and how the ocean is being used and what natural resources and habitats exist.
Benefits	Implementation
To coordinate the use of marine resources and helping minimize conflicts among stakeholders, maximize the benefits derived from the ocean, and maintain healthy marine ecosystems.	To provide a practical tool for achieving specified objectives through a political process, including setting objectives, initial assessment, implementation, monitoring, and review.

Marine Spatial Planning is a relatively new concept that has been employed by many jurisdictions to assist in the management of marine space, including the provision of Marine Protected Areas (MPAs). Marine Spatial Planning is not an end in itself, but a practical way to

<sup>6</sup> [Reports | Blue Marine Foundation](#)

<sup>7</sup> United Nations Educational, Scientific and Cultural Organization

<sup>8</sup> [Marine Spatial Planning | Intergovernmental Oceanographic Commission](#)

create and establish a more rational use of marine space and the interactions among its users, to balance demands for development with the need to protect the environment, and to deliver social and economic outcomes in an open and planned way.

## Marine Protected Areas

The definition of a marine protected area (MPA) adopted by IUCN<sup>9</sup> and other international and national bodies is:

*“Any area of intertidal or subtidal terrain, together with its overlying water and associated flora, fauna, historical and cultural features, which has been reserved by law or other effective means to protect part or all of the enclosed environment.”*<sup>10</sup>

In short, an MPA is a geographical defined area that has specific management measures in place primarily to maintain or enhance ecological systems, ensure sustainable utilization (e.g. fisheries) and preserve biotic diversity. Other reasons for establishing MPAs include scientific research, preservation of species and genetic diversity, maintenance of environmental services, protection of specific natural and cultural features, tourism and recreation, and education.

The rationale for establishing an MPA or MPA network will ultimately define the level of protection and the nature of management measures required. Protection can range from high level (e.g. no access or no take zones) through to managed access for recreational activities or fisheries. The IUCN has categorised protected areas based on their primary management objective; this set out in Table 2.

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<sup>9</sup> International Union for Conservation of Nature

<sup>10</sup> [IUCN Guidelines for Marine Protected Areas](#)



**Table 2.** IUCN Categories of Protected Areas

Category	Name	Purpose
Ia	Strict Nature Reserve	Protected for scientific research and monitoring; minimal human impact.
Ib	Wilderness Area	Large, unmodified areas preserved in natural condition; low human habitation.
II	National Park	Ecosystem protection and recreation; allows for compatible tourism and education.
III	Natural Monument or Feature	Protects specific natural features (e.g., sea mounts, marine caverns).
IV	Habitat/Species Management Area	Focused on conservation of particular species or habitats; may require active management.
V	Protected Landscape/Seascape	Conserves areas shaped by human-nature interaction with ecological and cultural value.
VI	Protected Area with Sustainable Use of Natural Resources	Allows low-level sustainable resource use while conserving ecosystems and cultural values.

### 3. Use and management of the marine space

Responsibility for the management of the marine environment, and any activities that occur there, is undertaken by Committees of the Chief Pleas. The Policy and Finance Committee are responsible for relationships with other Islands within the Bailiwick and external relations, in particular international conventions and agreements. The Harbours, Shipping and Pilotage Committee are responsible for harbour and shipping matters, and the Agriculture, Environment and Fisheries Committee for environmental and fisheries management and Douzaine Committee for public works.

#### **Territorial Waters**

The territorial sea adjacent to Alderney, Guernsey, and Sark were extended from 3 to 12 nautical miles, effective from 23 July 2019. The change was made by an Order in Council under the Territorial Seas Act 1987. Following that extension, the territorial sea of Sark covers approximately 430 km<sup>2</sup>. It was acknowledged that a median line between Sark and Guernsey's 3 NM territorial sea did exist but it has not been defined by agreed co-ordinates. Also, by virtue of the 1964 London Convention, an established 6 to 12 NM limit around the Bailiwick was in place to facilitate and regulate historic access rights to those areas. A chart detailing the 3, 6 and 12 NM (or median) limit between the islands within the Bailiwick has been produced for the purposes of defining the individual territorial waters. However, no formal agreement between the islands exists (see Figure 1). A Geographical Information System (GIS) file (with coordinates) was provided by the States of Guernsey and it is understood that this overlay has been used by Bailiwick authorities in negotiations with UK. It is therefore considered to have some legitimacy.

#### **International Commitments**

The Convention on the Law of the Sea (UNCLOS) which sets out the rights and responsibilities of nations in their use of the world's oceans, establishing guidelines for businesses, the environment, and the management of marine natural resources, including the protection and preservation of the marine environment in each territorial zone of the sea, has been extended to the Bailiwick of Guernsey, including Sark and ratified in October 1997.

#### **Legislation**

It is the case that other laws and maritime legislation apply to Sark and its waters, through consent of application of wider Bailiwick law (e.g. The Merchant Shipping (Bailiwick of Guernsey) Law, 2002 and subordinate legislation). This review has focused on legislation that has some element of spatial management, specific to Sark, that is relevant in the MSP context. All legislation referred to is the consolidated version that incorporates subsequent amendments to the original legislation and copies can be found on the Guernsey Legal Resources website.

### 3.1. Biodiversity and Natural Environment (incl. climate change)

#### 3.1.1. Governance

The Agriculture, Environment and Fisheries Committee is responsible for advising Chief Pleas on safeguarding the living marine resources within Sark waters and managing their exploitation in a sustainable manner and to develop and oversee matters concerning conservation and the environment.

#### 3.1.2. International Commitments

Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)	Extended 2002
The Convention on International Trade in Endangered Species of Wild Fauna and Flora, also known as "CITES" and the Washington Convention was adopted by members of the International Union for Conservation of Nature (IUCN). It accords varying degrees of protection to more than 35,000 species of plants and animals. It aims to ensure that international trade does not threaten their survival.	
Convention on the Conservation of Migratory Species of Wild Animals	Extended 2002 -2005
The Convention (also known as CMS or the Bonn Convention) aims to conserve terrestrial, marine and avian migratory species throughout their range.	
Convention on Wetlands of International Importance (RAMSAR)	Extended 1999
To achieve sustainable development throughout the world by the conservation and wise use of wetlands. There are currently 172 contracting parties with a total of 2,543 wetland sites <sup>11</sup> . Sark has one designated RAMSAR site, the Gouliot Caves and Headland	
Convention on Environmental Impact Assessment in a Transboundary Context (sometimes known as the Espoo Convention).	Ratified 1997
The Convention sets out the obligations of Parties to carry out an environmental impact assessment of certain activities at an early stage of planning. It also lays down the general obligation of States to notify and consult each other on all major projects under consideration that are likely to have a significant adverse environmental impact across boundaries.	

For the avoidance of doubt, the Convention on Biological Diversity (CBD) is in the process of being extended to Guernsey, but its extension to Sark is still under discussion. This discussion

<sup>11</sup> [Home page | The Convention on Wetlands, The Convention on Wetlands](#)

includes consideration of certain policy objectives within CBD, for example the Kunming – Montreal Global Biodiversity Framework, which includes the well-known 30 x 30 target.<sup>12</sup>

### 3.1.3. Legislation

There is no specific environmental legislation related to the marine environment. (Fisheries legislation is covered in a separate section.)

### 3.1.4. Policy

Sark does have a marine site of acknowledged international importance and which has been designated under the Ramsar (Wetlands of International Importance) Convention. Situated on the west coast, the Ramsar site is centred on the Gouliot Caves, a littoral and sublittoral fringe cave system, which crosses the headland three times and is submerged by strong surging tidal currents at high tide. The rocky headland supports a range of typical coastal habitat types including semi-natural coastal grassland/heath/bracken, soft rock and hard rock, and rocky shore. These support rare species of terrestrial plant, insects and lichens while the Caves themselves have long been noted for their exceptionally diverse marine invertebrate fauna. Around 200 species have been recorded, including purse sponge (*Grantia compressa*), northern cowrie (*Trivia arctica*), jewel anemone (*Corynactis viridis*) and Devonshire cup coral (*Caryophyllia smithii*). The sheer density of hydroids and anemones, made possible by tidal flows which bring copious amounts of food, is extremely unusual and possibly unique in the European Atlantic biogeographic region.

There is currently no management plan in place for the site but has been surveyed, most recently in 2012, by the Porcupine Marine Natural History Society. Analysis has shown that the site is not subject to any significant threats, apart from the alien invasive red ripple bryozoan (*Watersipora subtorquata*), which was first recorded in 2014 and whose coverage has since increased notably.<sup>13</sup>

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<sup>12</sup> [Chief Pleas Documents - Hansard of Midsummer Chief Pleas - 3rd July 2024.pdf - All Documents](#)

<sup>13</sup> [GB2276RIS\\_2312\\_en.pdf](#)

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## 3.2. Infrastructure (incl. harbours and transport)

### 3.2.1. Governance

The Harbours, Shipping and Pilotage Committee are responsible for activities within harbours and for general maritime activity within Sark waters. Douzaine are responsible for public works in the Island, including sewage and disposal of rubbish.

A Special Committee has been established to cover the issue of future energy. Should a renewable energy project be proposed within Sark Waters this Committee, together with the Sark Commission for Renewable Energy, the body established under the Renewable Energy (Sark) Law, would be responsible for the governance.

### 3.2.2. International Commitments

International Convention for the Safety of Life at Sea (SOLAS)	Extended
The main objective of the SOLAS convention is to specify minimum standards for the construction, equipment and operation of ships, compatible with their safety.	

### 3.2.3. Legislation

#### Maritime

#### **The Safety in Sark Waters Ordinance, 2008<sup>14</sup>**

This Ordinance set a maximum speed of six knots in areas around coastal areas of Sark, known as the “coastal restricted zones” (namely La Grève de la Ville, La Maseline, Creux Harbour, Les Lâches, Derribre Bay, Dixcart Bay, La Grande Grève, Port es Saies, Havre Gosselin, Port à la Jument, Port du Moulin, Saignie Bay)

#### **The Harbours (Sark) Ordinance, 2011<sup>15</sup>**

This Ordinance defines the harbours around Sark and the Committee’s obligations, requirements and powers. It also sets out powers of the Harbourmaster and the regulations in relation to mooring, anchoring and berthing. It also prescribes the use of harbour facilities, namely cranes and the requirements for licensing passenger vessels. A controlled zone is prescribed within which no moorings may be placed without permission (an imaginary line anti clockwise around Sark from Bec du Nez through the centre of Gouliot Passage, Pêche Lucas, Moie de Viet, Pierre du Cours, La Conchée, the east side of Les Bourons and the north extremity of Petite Moie)

<sup>14</sup> [Safety in Sark Water Ordinance 2008](#)

<sup>15</sup> [Harbours \(Sark\) Ordinance, 2011](#)



**The Harbours (Sark) Regulations, 2013<sup>16</sup>**

These Regulations make provision in relation to the conduct of persons in La Maseline and Creux Harbours.

**The Pilotage (Sark) Law, 1991<sup>17</sup>****The Sark Pilotage Ordinance, 1992<sup>18</sup>**

The pilotage legislation sets out the requirements in respect of pilotage including compulsory zones (circle with a radius of 10 kms centred on Sark Mill), licensing of pilots and exempted vessels.

**The Alderney and Sark (Licensing of Vessels) Law, 1951<sup>19</sup>****The Alderney and Sark (Licensing of Vessels)(Exemptions)(Sark) Ordinance, 2012<sup>20</sup>**

The Law set out to ensure the provision of passenger and cargo services to and from Sark, in particular the licensing arrangements for such vessels, to facilitate the year round, financially viable, provision of services with minimal weather disruption. It also sets out the Harbourmaster's power. The 2012 Ordinance provides additional exemptions for certain activities, in particular those vessels accessing Brecqhou and recreational voyages.

**Food and Environment Protection Act 1985 (Guernsey) Order 1987<sup>21</sup>**

This Order (commonly known as FEPA) controls deposits into the sea and is an extension of the same UK Act which has, in the UK, been superseded by the Marine and Coastal Access Act. It covers deposits such as dredge spoil, construction and even burials at sea. It is administered by Office of Environmental Health and Pollution Control in Guernsey. No deposits exemption order is in place. Chief Pleas (through Harbours, Shipping and Pilotage Committee) administer a mooring scheme for a small number of locations around the coast (namely Les Laches, La Maseline, Grève de la Ville, Havre Gosselin, and Creux Harbour dinghy line).

The issue of sewage disposal has been raised in respect to FEPA but as the current system of disposal occurs above Mean High Water Spring (MHWS) (C. Cragoe, pers. comms.). FEPA is not applicable as this legislation only applies to activities below the height.

It is also noted that crushed glass material is also deposited to sea at the bottom of Harbour Hill between La Maseline and Creux Harbours. Given the inert nature, and volume, of the material, it

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<sup>16</sup> [Chief Pleas Documents - 130410\\_Agenda.pdf - All Documents](#)

<sup>17</sup> [Pilotage \(Sark\) Law, 1991](#)

<sup>18</sup> [Sark Pilotage Ordinance, 1992](#)

<sup>19</sup> [Alderney and Sark \(Licensing of Vessels\) Law, 1951](#)

<sup>20</sup> [The Alderney and Sark \(Licensing of Vessels\)\(Exemptions\)\(Sark\) Ordinance 2012](#)

<sup>21</sup> [The Food and Environment Protection Act 1985 \(Guernsey\) Order 1987](#)

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is unlikely that this activity would have a significant impact on the marine environment, other than the localised physical smothering, but under FEPA a licence may be required.

### **Renewable energy**

#### **The Renewable Energy (Sark) Law, 2010<sup>22</sup>**

The Law provides for the regulation of renewable energy activities, the establishment of Sark Commission for Renewable Energy, and other associated matters, including, *inter alia*, extinguishing of navigations rights, reporting requirements and enforcement powers. To date no Ordinances have been made under the Law.

### **Aviation**

Aviation legislation applies to Sark even though there is no airport by virtue of the restricted area (R095) that prohibits aircraft flying at an altitude of less than 2500 ft (762 m). The flying of drones is also regulated under the same restrictions. Responsibility for R095 rests with the CI Director of Civil Aviation. There is an MOU with Chief Pleas that sets out how requests to enter the restricted area will be considered.

#### **3.2.4. Policy**

The subject of energy on Sark is a particularly pertinent one with ongoing discussions concerning the generation of electricity. With respect to renewable energy, the current policy focus is on terrestrial systems and not marine options (see Sark Community Power for further details<sup>23</sup>). There is the possibility that additional submarine power or telecommunication cables will be required to Sark or to transit territorial waters, but no specific plans are currently proposed.

The Sewerage (Sark) Law 1978 is not relevant to the marine environment although it should be noted that emptied cess pits are discharged to sea. This process occurs at the south-east corner of Sark at Les Lâches. As noted previously, under the section on FEPA legislation, these deposits do not directly discharge to sea as the length of the pipe and the topography of the cliff face result in material being discharged to ground above the level normal covered by tides. However, the gradual percolation of sewage into the sea may have an impact on the marine environment in the vicinity of the discharge point, but the reduced rate of entry and relatively low volume of the discharge together with the volume and speed of tidal movement is likely to significantly mitigate any wider impact. An assessment of marine habitats in the vicinity, together with sea water monitoring should be considered.

Due to an issue with the incinerator on Sark non-recyclable, burnable waste is disposed of in an open fire pit above Creux Harbour. Whilst the unregulated burning of rubbish is not considered to be good practice, contributing to greenhouse gases and soot particles, as well as the general

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<sup>22</sup> [Renewable Energy \(Sark\) Law, 2010](#)

<sup>23</sup> [Home | Sark Community Power](#)

impact of sea and landscape, a specific demonstrable impact in the marine environment is unlikely to be demonstrated.

### 3.3. Fisheries (incl. aquaculture)

#### 3.3.1. Governance

The Agriculture, Environment and Sea Fisheries Committee has the primary responsibility for fishing within the Sark Government. This responsibility is shared with the Economic Development Committee of the States of Guernsey, due to complex nature of fisheries management that exist in the Bailiwick. Legislation, licensing and enforcement requirements are split between the Sark and Guernsey authorities. Complex negotiations between the UK and EU in the wake of the UK's decision to leave the EU (colloquially known as Brexit) resulted in licensing arrangements that required an administrative framework to deliver and therefore, was taken on by the States of Guernsey.

#### 3.3.2. International Commitments

Whilst not a signatory to the Trade and Cooperation Agreement (TCA), the Agriculture, Environment and Sea Fisheries Committee is a Participant in the Memorandum of Understanding on Fisheries Management between the four Fisheries Policy Authorities of the UK and the Bailiwick of Guernsey Fishing Authorities (MOU). The Bailiwick is responsible for complying with relevant international obligations domestically and the MOU sets these responsibilities in respect of fishing, predominantly fishing opportunities and licensing arrangements.

#### 3.3.3. Legislation

Prior to 2019, Sark fisheries legislation applied to the 0 to 3 NM zone around the Island, the agreed territorial seas. Outside of the 0 to 3 NM zone, within the area known as British Sea Fisheries Limits, Bailiwick-wide legislation, predominantly The Fishing (Bailiwick of Guernsey) Law 1989, regulated fishing activity. Upon extension of the territorial waters, the application of legislation referring to Sark territorial seas and without any other caveat to extent, could be construed as automatically having applicability throughout the extended area to 12 NM. However, due to the complexities of the constitutional, legal and management of the fisheries obligations, some specific clauses were retained in respect of the operation of some Bailiwick fisheries legislation.

**Table 3.** Fisheries legislation and licensing summary.

	<b>Territorial Waters</b>		
	<b>0 to 3 NM</b>	<b>3 to 6 NM</b>	<b>6 to 12 NM (or median)</b>
<b>Fisheries legislation</b>	The Fishing (Sark) Ordinance 1996	The Fishing (Bailiwick of Guernsey) Law 1989	The Fishing (Bailiwick of Guernsey) Law 1989
<b>Fisheries authority</b>	Agriculture, Environment and Sea Fisheries Committee	Committee for Economic Development <sup>24</sup>	Committee for Economic Development
<b>Fisheries licensing legislation</b>	The Sea Fish Licensing (Sark) Ordinance, 2003	The Sea Fish Licensing (Bailiwick of Guernsey) Law 2012	The Sea Fish Licensing (Bailiwick of Guernsey) Law 2012
<b>Fisheries licensing authority</b>	Committee for Economic Development	Committee for Economic Development	Committee for Economic Development
<b>Fishing vessel access</b>	Bailiwick of Guernsey vessels <sup>25</sup>	Bailiwick of Guernsey vessels, British vessels	Bailiwick of Guernsey vessels, British vessels, EU vessels <sup>26</sup>
<b>Fisheries monitoring and compliance</b>	Agriculture, Environment and Sea Fisheries Committee,  Committee for Economic Development	Committee for Economic Development	Committee for Economic Development

<sup>24</sup> States of Guernsey<sup>25</sup> A very small number of Jersey vessels are licensed to fish 0 to 3 through historic rights but rarely exercise<sup>26</sup> No EU vessels can access the 6 to 12 miles NE of Sark. A small number can access the triangular area to the SW



### The Fishing (Sark) Ordinance, 1996<sup>27</sup>

This Ordinance set out the main controls on fishing within Sark waters. It details prohibitions on possession of certain species (e.g. crawfish), and the use of certain gear types (namely, diving, dredging, beam trawling), the prohibition on export of certain species (e.g. ormers, wrasse) and landing of parts of certain crustacean species (lobster and crab). Restrictions on trawling and maximum engine power that may be employed when trawling is also set out. The legislation applies to Sark Territorial Waters.

**Table 4.** Spatial controls on fishing metiers in Sark 0 to 3 NM territorial seas. Red – Prohibited; Orange – Permitted under certain circumstances; Green – Permitted. Inshore areas closed to all trawling (See The Fishing (Sark) Ordinance 1996 for details). Beam trawling limited to a maximum vessel size of 8.5 m. This could be considered as a de facto ban on commercial beam trawling. Only scallops may be taken by diving under licence.

Metier / gear	J	F	M	A	M	J	J	A	S	O	N	D
Dredge												
All trawls												
Beam trawl												
Parlour pots												
Other pots												
Static nets												
Diving												
Spearfishing												

### The Scallops (Sark) Ordinance, 1998<sup>28</sup>

The Ordinance establishes a closed season for scallops (20<sup>th</sup> Oct – 20<sup>th</sup> Mar inclusive). Scallops (*Pecten maximus*) can only be taken under license issued by the Committee and subject to conditions including duration, area of territorial waters, period during which scallops may be taken and quantity and size, the use to which the scallops may be put and the keeping of records.

License conditions do not allow for any export of scallops from Sark, have a minimum legal size of 12 cm, and require catch reporting. Currently no more than ten licences are issued for any one season.

<sup>27</sup> [Fishing \(Sark\) Ordinance, 1996](#)

<sup>28</sup> [Scallops \(Sark\) Ordinance, 1998](#)

**Table 5.** Spatial controls on fishing for (or taking) certain species in Sark 0 to 3 NM territorial seas. Red – Prohibited; Green – Permitted. Scallops can only be taken by diving under licence. Small cetaceans includes all species of toothed whale (Odontoceti) other than Sperm Whale (*Physeter macrocephalus*)

Species	J	F	M	A	M	J	J	A	S	O	N	D
Crawfish												
Lobster												
Crab												
Ormer												
Scallop												
Small cetaceans												
Basking shark												

### The Fishing (Parlour Pots)(Sark) Ordinance, 1992

This Ordinance has been repealed and requirement in relation to parlour pots incorporated into the Fishing (Sark) Ordinance.

### The Fishing (Conservation of Small Cetaceans)(Sark) Ordinance, 2000<sup>29</sup>

This Ordinance prohibits the capture and/or possession of any small cetacean or basking shark and requires, if accidentally caught, the return to the sea forthwith.

#### *Fishing Vessel Licensing*

The Sea Fish Licensing (Bailiwick of Guernsey) Law 2012 does not apply to the territorial seas adjacent to Alderney and Sark. However, the legislation clearly states that the States of Alderney and the Chief Pleas of Sark may respectively by Ordinance provide that this Law or any of its provisions shall extend to the territorial seas adjacent to Alderney or Sark (as the case may be) subject to such exceptions, adaptations and modifications as may be prescribed in the Ordinance.

The legislation also states that the expression "the territorial seas adjacent to Alderney and Sark" is a reference to those seas as they are delimited at the date of commencement of this Law. (That is, notwithstanding any extension of the limits of the territorial seas that may occur after that date, they extend to a line not exceeding 3 NM from the baselines from which the breadth of the territorial seas adjacent to those islands is measured, but not, in the case of

<sup>29</sup> [Fishing \(Conservation of Cetaceans\)\(Sark\) Ordinance 2000](#)

Sark, beyond a line every point of which is equidistant from the nearest points of such baselines and the corresponding baselines adjacent to Guernsey, Herm and Jethou.)

### **The Sea Fish Licensing (Sark) Ordinance, 2003<sup>30</sup>**

This Ordinance applies in the Territorial waters 0 to 3 miles zone and requires all those wishing to fish commercially must have a licence issued by the Committee for Economic Development, States of Guernsey. The licence may have conditions imposed including area within and times when which fishing is authorised, description and quantities of fish and methods of fishing, although should be noted that the Fishing (Sark) Ordinance 1996 still applies.

Licensing outside of the 3 mile is undertaken by the Committee for Economic Development and under the vires set out in The Sea Fish Licensing (Bailiwick of Guernsey) Law 2012. Licenses are also issued to qualifying EU vessels under the same legislation for the 6 to 12 NM (or median line).

#### **3.3.4. Policy**

Fisheries policy and management is complex. The MOU between Guernsey, Alderney and Sark in the Bailiwick and the four UK fishing authorities does set out the framework for policy related to fishing, in particular fishing opportunities (i.e. quotas) and licensing arrangements. The MOU clearly states that fishing activity in the 0 to 3 NM is regulated by The Fishing (Sark) Ordinance and fishing licensing by The Sea Fish Licensing (Sark) Ordinance.

Section 5 paragraph 8 of the MOU also states that “The Participants recognise that fisheries within the 0 - 3 NM or 0-6 NM areas of the territorial sea adjacent to the Bailiwick may be subject to different access arrangements from those in the 3-12 NM or 6-12 NM areas to enable adaptive, flexible management measures driven by local priorities and the need to secure sustainable inshore fisheries.”

Policy and management measures inside the 3 mile would appear to sit under the remit of the Agriculture, Environment and Fishing Committee of the Chief Pleas, ensuring compliance under Section 6 of the MOU. Outside of the 3 NM limit The Committee has the same right as any other participant to propose new management measures, but that would involve further collaboration, consultation and evidence gathering to comply with the MOU and overarching TCA. The Bailiwick Fisheries Commission, established primarily to co-ordinate policy and legal work for the implementation of licensing in 2012, still exists but since then another group, the Bailiwick Council, has tended to be the forum for discussion of matters including fisheries.

Section 2 paragraph 8 of the MOU should also be noted in that enactments not made for the purposes of fishing regulation are out of scope. So, in theory, if spatial management was put in place to protect biodiversity, then it could be argued that the MOU was not applicable. However, in practice, the disentanglement of these issues is problematic; and, as a rule, fishing activity will need to be considered in the majority of marine management measures.

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<sup>30</sup> [Sea Fish Licensing \(Sark\) Ordinance 2003](#)

Monitoring of fishing activity and enforcement of fisheries legislation is shared between Sark and Guernsey. Sark have an inshore vessel and sea fisheries officer(s) that can monitor and control fishing exclusively in the 0 to 3 NM area at sea and ashore in Sark. Outside of the 3 NM, general responsibility falls to Guernsey's Committee for Economic Development.

There is no aquaculture (incl. mariculture) occurring on Sark at this time although it is understood seaweed farming has been considered. There are no policies in place to manage or regulate aquaculture enterprises.

### 3.4. Other activities / uses

#### 3.4.1. Development Control

Development control is legislated under the Development Control (Sark) Law, 1991 and the Development Control (Sark) Ordinance, 1992. There is no specific reference to territorial extent but it has been assumed that the legislation is limited to development above mean high water spring (MHWS) (W. Spooner, pers. comms.) and therefore outside of the scope of this review. However, the legislation associated with development does require consideration of land and seascape (specifically visibility from any part of the territorial waters adjacent to the Island) and therefore does play a role in spatial planning.

#### 3.4.2. Tourism and Leisure

Legislation for this sector relates more generally to permitting requirements for non-residential accommodation and catering establishments and therefore outside of the scope of this review.

It is noted that there is currently no programme of bathing water monitoring. Jersey and Guernsey have monitoring programmes using standards set out in the EU Bathing Water Quality Directive 2006. (For comparison Alderney does not currently have a testing regime.) Given the population of Sark, and the tidal conditions that exist, it is likely that water quality is high. However, evidence would assist in clarifying this and may have some reputational and marketing benefits.

#### 3.4.3. History and Culture

Whilst there is significant research into the maritime history of Sark, including shipwrecks, there is no specific legislation in place covering their protection and conservation. The Development Control (Sark) Ordinance, 1992 does reference historical and archaeological considerations under this legislation but as stated above, out of scope for this review.

## 4. Options and Recommendations

The Government of Sark has developed a pragmatic approach both to policy development and legislative controls to fit the needs of the Island, balancing scale, impact and resources available. The Island has employed the option to extend Bailiwick wide policies and legislation to cover those necessary complex requirements.

Sark has also taken the opportunity to manage marine resources and fishing activity, in particular through Ordinance that provide greater protection than wider Bailiwick legislation. It should also be stated the size of the community and the resultant accessibility between elected Conseillers and members of certain industries and the wider public, facilitate a more consultative and pragmatic approach without the need for codifying any outcome (i.e. a verbal agreement to act in a certain way is deemed sufficient intervention to achieve the required outcome).

This approach, however, can lack the rigor, clarity, longevity and external recognition that may be desired or required.

The recommendations below seek to achieve a balance between protection, recognition and practicality. There is a desire in Sark to manage, protect and conserve the marine environment and acknowledgement that this brings with it associated benefits. These aspirations need to be combined with the practicality of delivering and administering effective management given the constitutional position and resources available. Development and implementation of recommendations will need to be determined by discussion and future policy within Chief Pleas and the relevant Committees.

The opportunity to develop a single MPA (or an MPA network) exists and should be part of future policy considerations. As discussed, the term 'MPA' covers a wide range of protection levels and management options. It is important that, in future discussions about protected areas, it is clear what that level of protection is intended to be.

High protection areas may have no extraction of marine species (i.e. no fishing), interaction with the seabed (e.g. no anchoring or mineral extraction) or dumping (e.g. dredge spoil). Medium biodiversity protection areas may allow certain low impact fishing activities (such as diving, potting and netting) but limit other more disruptive ones (such as trawling and dredging). Many MPAs in England limit types of fishing activity to maintain or restore seabed life. The development of MPAs should be evidence-based and include a process of habitat identification and mapping, to ensure best understanding of species and habitat distributions.

Should Sark seek to develop MPAs and a wider MSP, then a full consultation process with key stakeholders will be required. Consultation with Guernsey, other Channel Islands, UK and France may be required although it is hoped that any enhancement of Sark's marine protection will augment existing protected area networks and aspirations and would be well received.

## Recommendations

Recommendation	Summary	Approach
1. Formal agreement of territorial seas	Formally adopting co-ordinates as set out in a GIS .shp file used for the discussions with the UK on territorial seas and fisheries management, thereby agreeing the extent of Sark waters.	Committee / Chief Pleas policy decision.
2. Assessment of impact of sewage disposal	Concise assessment of impact to marine environment (both habitats/species and water quality) to assist with considerations as to the need to improved treatment of sewage prior to disposal, including maximise existing / replace current treatment system or increasing the length of the current pipe.	Resources required to assess impact. Committee / Chief Pleas consideration and policy decision. Resources required to achieve policy decision. Possible FEPA application.
3a. Development of MPAs	Consideration as to the extent and nature of any MPAs, in particular any CBD goals (30 x 30) and any levels of protection (e.g. highly versus medium protection) afforded to a future MPA.	Committee / Chief Pleas policy decision. Public consultation.
3b. Development of MPAs	Following consideration of the habitat map consult on areas that could be designated as High biodiversity protection areas.	Committee / Chief Pleas policy decision. Public consultation. Legislation amendments to reflect.
3c. Development of MPAs	Following consideration of the habitat map consult on areas that could be designated as medium biodiversity protection areas.	Committee / Chief Pleas policy decision. Public consultation. Legislation amendments to reflect.
4. Fisheries management measures	It is understood that Sark fishers, currently four in number, use static gear only. Consideration of further management measures in relation to mobile gear metiers could be well received but a wider consultation to include other fishers with licenses to fish in those waters would be needed. The detail	Committee / Chief Pleas policy decision. Public consultation. Legislation amendments to reflect.



	and process attached to those consultations would change depending on the area under consideration (i.e 0 to 3, 3 to 6 or 6 to 12 NM or median) and set out under the MOU.	
5. Formal recognition of MPAs	To ensure maximum benefit of any MPAs from a recognition perspective, formal designation under a formal process should be sought. Various International mechanisms exist including OSPAR, CBD (Ecological or Biologically Significant Area (EBSA) or registration with World Database on Protected Areas (WDPA) managed by UNEP – WCMC.	If required, consider extension of appropriate international agreement. Complete application process (resources required).
6. Management plan incl. monitoring and enforcement	An appropriate management plan would be required including monitoring and enforcement. Any plan would need to be appropriately scaled to fit locale and resources.	Resources required to develop and implement management plan.
7. Aquaculture policy	Preliminary consideration should be given to an aquaculture / mariculture policy. Whilst this has not yet occurred it is important to ensure process in place before any licence applications granted including Environmental Impact Assessment (EIA), liabilities etc.	Resources required to develop aquaculture policy. Committee / Chief Pleas policy decision. New / amended legislation.
8. Environmentally sustainable waste disposal	Whilst unlikely to be a measurable impact on the marine environment by itself, due to the contributory nature to overall climate change (as well as perception) an alternative method sought be sought for disposal of non-recyclable, combustible waste.	Resources required to employ alternative process for disposal of waste.

**DOUZAINE**

**Report with Propositions to Christmas Chief Pleas, 21st January 2026**

**AMENDMENTS TO THE MOTOR VEHICLES (SARK)  
REGULATIONS, 2014**

The Motor Vehicles (Sark) Regulations, 2014 states the maximum size of tractors that may be licenced under section 9(2) of the Motor Vehicles (Sark) Law, 2013 but currently does not state how the measurements are taken. The Douzaine wishes to amend the legislation to specify how tractors are measured as follows (*in italics*):

- (a) length 3.60 metres, *measured from the rear of the back tyre to the front of the front tyre or bonnet, whichever is longer*
- (b) width 2 metres, *measured at its widest part,*
- (c) height 2.56 metres, *measured from ground to highest point*

At present, the Law allows the Douzaine to restrict the power of a tractor that may be licenced which is something it is considering. It is also looking to amend the 2013 Law to allow the Douzaine to be able to restrict the weight of a tractor that may be licenced. The Douzaine hopes to be able to bring this back to Chief Pleas in 2026.

The 2014 Regulations also include forms to be completed when applying for various driving licences and/or for importing vehicles. The Douzaines wishes to update the regulations and the application forms (see *Appendix One*). This includes simplifying the Tractor Licencing Codes (see *Appendix Two*).

If Chief Pleas approves these propositions, the Douzaine will draft and sign a Regulation to bring it into effect. This Regulation will be laid before Chief Pleas at the next available meeting.

**Proposition 1 -**

**That Chief Pleas approves the amendment to the Motor Vehicles (Sark) Regulations, 2014 to specify how tractors are measured.**

**Proposition 2 -**

**That Chief Pleas approves the amendment to the Motor Vehicles (Sark) Regulations, 2014 to update the driving licence and import application forms in the Motor Vehicle (Sark) Regulations, 2014, including updated tractor licencing codes.**

**Conseiller Mike Locke  
Chair, Douzaine**

## Schedule 1

# Tractor Licence New Application Form

## Year 20\_\_\_\_\_

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This form must be completed in full by any tractor owner applying for a new tractor licence. Licences are valid until 31<sup>st</sup> December of the year in which they are issued and must be renewed annually. Failure to provide accurate information may result in refusal, suspension, or revocation of the licence.

### Section 1 – Applicant Details

Full Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

**Please give your email if you consent to Chief Pleas and the Committee Office contacting you by email for official business:**

Email: \_\_\_\_\_

### Section 2 – Tractor Details

Make/Model: \_\_\_\_\_

Dimensions of Tractor (in metres and centimetres):

- a) Length \_\_\_\_\_ measured from the rear of the back tyre to the front of the front tyre or bonnet, whichever is longer,
- b) width \_\_\_\_\_ measured at its widest part,
- c) height \_\_\_\_\_ metres, measured from ground to highest point

Engine power of tractor: \_\_\_\_\_

### Section 3 – Business Use Declaration

Please describe the business, trade, or occupation in connection with which this tractor is used:

- ☐ Agriculture (Code A)   ☐ Building (Code B)   ☐ Charitable Events (Code C)
  - ☐ Emergency Services (Code E)   ☐ Fishing (Commercial only) (Code F)
  - ☐ General Carting (Code G)   ☐ Other (please specify) (Code O): \_\_\_\_\_
-

Please use space below for any further information:

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#### Section 4 – Sunday Use

Permission must be requested from the Constable annually to drive on a Sunday.

**IT IS AN OFFENCE TO DRIVE A TRACTOR ON A SUNDAY WITHOUT PERMISSION FROM THE CONSTABLE**

#### Section 5 – Harbour Use

Do you require permission to use the harbour with this tractor? ☐ Yes (Code H) ☐ No

If yes, please explain the purpose:

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#### Section 5 – Declaration

I declare that the information provided above is true and accurate. I understand that tractor licences are granted only for business, trade, or occupational use, and that personal/private use is not permitted. I understand that conditions may be attached to this licence, and that breach of such conditions may result in suspension or revocation.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

I enclose the fee for £300.

☐

**Your data is held by the Committee Office on behalf of Chief Pleas and will be processed in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017. This may include the publication of government notices and communications. For further information on how your personal data may be processed, please see the Chief Pleas Data Protection Policy and Fair Processing Notices at <https://sarkgov.co.uk/data-protection>.**

## Schedule 1

# Tractor Licence Renewal Form for Year 20\_\_\_\_

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This form must be completed in full by any tractor owner applying to renew a tractor licence. Licences are valid until 31<sup>st</sup> December of the year in which they are issued and must be renewed annually. Failure to provide accurate information may result in refusal, suspension, or revocation of the licence.

## Section 1 – Applicant Details

Full Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

**Please give your email if you consent to Chief Pleas and the Committee Office contacting you by email for official business:**

Email: \_\_\_\_\_

## Section 2 – Tractor Details

Make/Model: \_\_\_\_\_

Number of current tractor licence: \_\_\_\_\_

## Section 3 – Business Use Declaration

Please describe the business, trade, or occupation in connection with which this tractor is used:

- ☐ Agriculture (Code A)   ☐ Building (Code B)   ☐ Charitable Events (Code C)  
☐ Emergency Services (Code E)   ☐ Fishing (Commercial only) (Code F)  
☐ General Carting (Code G)   ☐ Other (please specify) (Code O): \_\_\_\_\_
-



Please use space below for any further information:

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#### Section 4 – Sunday Use

Permission must be requested from the Constable annually to drive on a Sunday.

**IT IS AN OFFENCE TO DRIVE A TRACTOR ON A SUNDAY WITHOUT PERMISSION FROM THE CONSTABLE**

#### Section 5 – Harbour Use

Do you require permission to use the harbour with this tractor? ☐ Yes (Code H) ☐ No

If yes, please explain the purpose:

---

#### Section 5 – Declaration

I declare that the information provided above is true and accurate. I understand that tractor licences are granted only for business, trade, or occupational use, and that personal/private use is not permitted. I understand that conditions may be attached to this licence, and that breach of such conditions may result in suspension or revocation.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

I enclose the fee of £300

☐

**Your data is held by the Committee Office on behalf of Chief Pleas and will be processed in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017. This may include the publication of government notices and communications. For further information on how your personal data may be processed, please see the Chief Pleas Data Protection Policy and Fair Processing Notices at <https://sarkgov.co.uk/data-protection>.**

## Schedule 2

## Provisional Driving Licence Application Form

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This form must be completed by any person applying for a provisional tractor licence. Licences are valid until 31<sup>st</sup> December of the year in which they are issued. A new provisional licence must be purchased in January if you have not yet taken your test.

### Section 1 – Applicant Details

Full Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

**Please give your email if you consent to Chief Pleas and the Committee Office contacting you by email for official business:**

Email: \_\_\_\_\_

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

I enclose the fee of £20

☐

**Provisional Tractor Driving Licence issued by:** \_\_\_\_\_

Licence Numer: \_\_\_\_\_ Date issued: \_\_\_\_\_

Signed: \_\_\_\_\_

## DRIVING TEST

Driving Test done by: \_\_\_\_\_ Role: \_\_\_\_\_

Test passed with:

Link box

☐

Trailer

☐

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**Please take this form to your driving test to be completed by the tester and bring back to the Committee Office to get your full driving licence.**

**Your data is held by the Committee Office on behalf of Chief Pleas and will be processed in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017. This may include the publication of government notices and communications. For further information on how your personal data may be processed, please see the Chief Pleas Data Protection Policy and Fair Processing Notices at <https://sarkgov.co.uk/data-protection>.**

## Schedule 4

# Invalid Carriage Licence New Application Form

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Licences are valid until 31<sup>st</sup> December of the year in which they are issued and must be renewed annually.

## Section 1 – Applicant Details

Full Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

**Please give your email if you consent to Chief Pleas and the Committee Office contacting you by email for official business:**

Email: \_\_\_\_\_

## Section 2 – Description of Invalid Carriage

Make/Model: \_\_\_\_\_

Engine power of invalid carriage: \_\_\_\_\_

I enclose a copy of the certificate of insurance relating to the invalid carriage.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

I enclose the fee of £20



**Your data is held by the Committee Office on behalf of Chief Pleas and will be processed in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017. This may include the publication of government notices and communications. For further information on how your personal data may be processed, please see the Chief Pleas Data Protection Policy and Fair Processing Notices at <https://sarkgov.co.uk/data-protection>.**

## Schedule 5

# Invalid Carriage Driving Licence New Application Form

---

Licences are valid until 31<sup>st</sup> December of the year in which they are issued and must be renewed annually.

## Section 1 – Applicant Details

Full Name: \_\_\_\_\_

Address: \_\_\_\_\_

**Please give your email if you consent to Chief Pleas and the Committee Office contacting you by email for official business:**

Email: \_\_\_\_\_

Telephone: \_\_\_\_\_

**I enclose:**

- i) a copy of a doctor's certificate relating to my need for an invalid carriage.
- ii) A copy of my invalid carriage driving competency test pass certificate.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

**Your data is held by the Committee Office on behalf of Chief Pleas and will be processed in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017. This may include the publication of government notices and communications. For further information on how your personal data may be processed, please see the Chief Pleas Data Protection Policy and Fair Processing Notices at <https://sarkgov.co.uk/data-protection>.**

## Schedule 6

# Construction Vehicle Import and Licence Application Form

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This form must be completed in full by anyone applying to import and licence a new construction vehicle. Licences are valid until 31<sup>st</sup> December of the year in which they are issued and must be renewed annually. Failure to provide accurate information may result in refusal, suspension, or revocation of the licence.

## Section 1 – Applicant Details

Full Name: \_\_\_\_\_

Address: \_\_\_\_\_

**Please give your email if you consent to Chief Pleas and the Committee Office contacting you by email for official business:**

Email: \_\_\_\_\_

Telephone: \_\_\_\_\_

## Section 2 – Description of vehicle

Make/Model: \_\_\_\_\_

Dimensions of vehicle (in metres and centimetres):

- a) Length \_\_\_\_\_ measured from the rear of the back tyre to the front of the front tyre or bonnet, whichever is longer,
- b) width \_\_\_\_\_ measured at its widest part,
- c) height \_\_\_\_\_ metres, measured from ground to highest point

Engine power of vehicle: \_\_\_\_\_

## Section 3 – Business Use Declaration

Please describe the business, trade, or occupation in connection with which this construction vehicle will be used:

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#### Section 4 – Sunday Use

Permission must be requested from the Constable annually to drive on a Sunday.

**IT IS AN OFFENCE TO DRIVE A CONSTRUCTION VEHICLE ON THE ROAD ON A SUNDAY WITHOUT PERMISSION FROM THE CONSTABLE**

#### Section 5 – Proposed Operators of the Vehicle

Please list below any people who will be operating the vehicle.

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#### Section 6 – Declaration

I declare that the information provided above is true and accurate. I understand that conditions may be attached to this licence, and that breach of such conditions may result in suspension or revocation.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

I enclose the fee of £300

☐

**Your data is held by the Committee Office on behalf of Chief Pleas and will be processed in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017. This may include the publication of government notices and communications. For further information on how your personal data may be processed, please see the Chief Pleas Data Protection Policy and Fair Processing Notices at <https://sarkgov.co.uk/data-protection>.**

## Schedule 6

# Construction Vehicle Licence Renewal Form

---

This form must be completed in full by anyone applying to renew a construction vehicle licence. Licences are valid until 31<sup>st</sup> December of the year in which they are issued and must be renewed annually. Failure to provide accurate information may result in refusal, suspension, or revocation of the licence.

## Section 1 – Applicant Details

Full Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_

**Please give your email if you consent to Chief Pleas and the Committee Office contacting you by email for official business:**

Email: \_\_\_\_\_

## Section 2 – Description of vehicle

Make/Model: \_\_\_\_\_

Number of current licence: \_\_\_\_\_

## Section 3 – Business Use Declaration

Please describe the business, trade, or occupation in connection with which this construction vehicle will be used:

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#### Section 4 – Sunday Use

Permission must be requested from the Constable annually to drive on a Sunday.

**IT IS AN OFFENCE TO DRIVE A CONSTRUCTION VEHICLE ON THE ROAD ON A SUNDAY WITHOUT PERMISSION FROM THE CONSTABLE**

#### Section 5 – Proposed Operators of the Vehicle

Please list below any people who will be operating the vehicle.

---

---

---

#### Section 6 – Declaration

I declare that the information provided above is true and accurate. I understand that conditions may be attached to this licence, and that breach of such conditions may result in suspension or revocation.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

I enclose the fee of £300



**Your data is held by the Committee Office on behalf of Chief Pleas and will be processed in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017. This may include the publication of government notices and communications. For further information on how your personal data may be processed, please see the Chief Pleas Data Protection Policy and Fair Processing Notices at <https://sarkgov.co.uk/data-protection>.**

## Schedule 7

# Tractor Import and New Licence Application Form

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This form must be completed in full by anyone applying to import and licence a new tractor. Licences are valid until 31<sup>st</sup> December of the year in which they are issued and must be renewed annually. Failure to provide accurate information may result in refusal, suspension, or revocation of the licence.

## Section 1 – Applicant Details

Full Name: \_\_\_\_\_

Address: \_\_\_\_\_

**Please give your email if you consent to Chief Pleas and the Committee Office contacting you by email for official business:**

Email: \_\_\_\_\_

Telephone: \_\_\_\_\_

## Section 2 – Description of vehicle

Make/Model: \_\_\_\_\_

Dimensions of tractor (in metres and centimetres):

- a) Length \_\_\_\_\_ measured from the rear of the back tyre to the front of the front tyre or bonnet, whichever is longer,
- b) width \_\_\_\_\_ measured at its widest part,
- c) height \_\_\_\_\_ metres, measured from ground to highest point

Engine power of tractor: \_\_\_\_\_

## Section 3 – Business Use Declaration

Please describe the business, trade, or occupation in connection with which this tractor is used:

- ☐ Agriculture (Code A)   ☐ Building (Code B)   ☐ Charitable Events (Code C)
- ☐ Emergency Services (Code E)   ☐ Fishing (Commercial only) (Code F)
- ☐ General Carting (Code G)   ☐ Other (please specify) (Code O): \_\_\_\_\_

Please use space below for any further information:

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#### Section 4 – Sunday Use

Permission must be requested from the Constable annually to drive on a Sunday.

**IT IS AN OFFENCE TO DRIVE A CONSTRUCTION VEHICLE ON THE ROAD ON A SUNDAY  
WITHOUT PERMISSION FROM THE CONSTABLE**

#### Section 5 – Harbour Use

Do you require permission to use the harbour with this tractor? ☐ Yes (Code H) ☐ No

If yes, please explain the purpose:

---

#### Section 6 – Declaration

I declare that the information provided above is true and accurate. I understand that conditions may be attached to this licence, and that breach of such conditions may result in suspension or revocation.

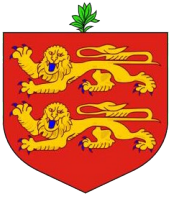
Signed: \_\_\_\_\_

Date: \_\_\_\_\_

I enclose the fee of £300

☐

**Your data is held by the Committee Office on behalf of Chief Pleas and will be processed in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017. This may include the publication of government notices and communications. For further information on how your personal data may be processed, please see the Chief Pleas Data Protection Policy and Fair Processing Notices at <https://sarkgov.co.uk/data-protection>.**



# Road Traffic Committee Tractor Licencing Code Definitions

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## **A. AGRICULTURE, HORTICULTURE AND GARDEN MAINTENANCE**

To include the transport of all agricultural, horticultural and gardening machinery, implements, tools, livestock, meat, fodder, water, crops, fertiliser, compost, seeds, plants, timber, fencing equipment and equipment for arboreal work.

## **B. BUILDING CONTRACTORS (PLUMBING, ELECTRICAL BUILDING)**

To include the transportation of all building materials involved in plumbing, electrical, decorating and construction works to include ladders, scaffolding, removal of waste rubble and disposal of same.

## **C. CHARITABLE EVENTS**

The transportation of paraphernalia related to recognised charitable events, for no monetary gain.

## **E. EMERGENCY SERVICES**

For tractors which are usually used by the Fire Service, Doctor, Ambulance Service, Constables, all restrictions are lifted, except for the safety of operatives and public, when on service call. (Please ensure insurance policy covers this.)

## **F. FISHING \*\*(COMMERCIAL ONLY)\*\***

The transportation of boats subject to time restrictions related equipment, fuel, mooring equipment, catches to and from Harbours and distribution of said catches to customers.

## **G. GENERAL CARTING**

The service of carting to and from the Harbours and distribution round the Island shipping containers, commodities, cargo, luggage, supplies, parcels and boats for reward.

## **H. HARBOUR ACCESS**

Access to Harbours only for reasons connected to the business of the tractor owner.

## **O. OTHER**

Other as stated on licence application form.

## **SPECIAL PERMISSIONS**

Prior permission can be obtained from the Constable to temporarily allow, on an ad hoc basis, the use of a tractor which has not been granted a specific definition; but only at the Constables discretion.

**Permission must be obtained from the Constable before driving on a Sunday.**

## **NOTES**

1. No tractor is permitted to be parked or left unattended on Harbour Hill between the Power Station and the bottom apron between Maseline and Creux Harbour Tunnels at any time except for holders of an H code legitimately attending a cargo or passenger boat.
2. Except for those permitted to legitimately attend cargo or passenger boats NOT to attempt to descend or ascend Harbour Hill one hour before or half hour after scheduled sailings of said boats.
3. No tractor is allowed to park on Creux Harbour and left unattended unless whilst operating under F.



**DOUZAINE**

**Report with Propositions to Christmas Chief Pleas, 21st January 2026**

**Amendments to the Road Traffic Offences (Motor Vehicles and Bicycles) (Sark) Regulations, 2014**

The Road Traffic Offences (Motor Vehicles and Bicycles) (Sark) Law, 2013 allows the Douzaine to restrict the driving on any public road specified by regulations to a speed not exceeding five miles an hour. Under the Road Traffic Offences (Motor Vehicles and Bicycles) (Sark) Regulations, 2014 it is an offence to drive a tractor at a speed exceeding five miles an hour between -

- (a) the Visitor Centre and the Mill,
- (b) the Visitor Centre and Clos a Jaon junction, and
- (c) the Visitor Centre and the Power Station via the Avenue.

Keeping La Coupée usable has been a problem for years if not centuries and millennia. In fact, the geology means that, like many other areas of Sark, it has always been subject to erosion and rockfalls. In the 1700s, it was reduced to just a few feet across. In the past, it was sufficient to wait for a collapse and then fix it piecemeal.

That was in the days of foot, horse and horse-drawn traffic. Now, the loads and traffic are significantly heavier and more frequent. The wear-and-tear on the roadway and the underlying structure are much higher.

Inspections by local experts, Geomarine, were commissioned and identified areas of concern. Their report was submitted in December 2024 and is available on the Chief Pleas website. However, before any action could be taken, in January 2025, there was a collapse of one of those areas: on the Guernsey side at the Little Sark end. Fortunately, we were able to call on Geomarine to carry out urgent repairs, supported by local resources. Thanks to everyone's hard work, La Coupée was reopened within a few weeks.

After that, we asked Geomarine to submit a plan for rectification and preventative work for La Coupée to reduce the risk of further collapse which could happen in-season or, worse, involve personal injury to islanders and visitors.

Collapses are caused by erosion which is worsened by rain run-off and heavy loads on the roadway itself. A voluntary weight limit for trailer loads of 750kg has helped and we would like to thank all carters for keeping to that. Exceptions to this are emergency responses and for specific needs after application.

Earlier this year, we carried out works on drainage to reduce the effect of rain run-off. This was done by our own Public Works and by Geomarine with local resource. A significant programme is planned after Easter 2026.

Another factor is speed. Tractors and trailers crossing La Coupée cause the concrete roadway to move on top of the rock and rubble structure below. This opens cracks in the roadway which lets rain in which erodes the structure from within – leading to collapses as we saw in January. We commissioned repairs to some of these cracks. But within 4 or 5 weeks, some of the cracks started to re-open.

An important point is that this risk of movement and cracking will continue even after the Easter 2026 works.

The preventative advice from Geomarine is to reduce the speed of tractors to around walking pace. This should reduce roadway movement and cracking – and the resulting water erosion. The weight limit will be reviewed after the works are complete, and inspected; but the speed issue is ongoing.

Therefore, the Douzaine wishes to add La Coupée to the roads where driving is restricted to a maximum of five miles an hour. It would also like the legislation to be changed to cover all motor vehicles, as defined under the Motor Vehicles (Sark) Law, 2013, rather than just tractors. If Chief Pleas approves this proposition, the Douzaine will draft and sign a Regulation to bring it into effect. This Regulation will be laid before Chief Pleas at the next available meeting.

We thank all road users for treating La Coupée with care and helping prevent future inconvenient, costly and possibly dangerous collapses.

#### **Proposition 1 -**

**That Chief Pleas approves the addition of La Coupée to the list of public roads where it is an offence to drive at a speed exceeding five miles an hour.**

#### **Proposition 2 -**

**That Chief Pleas approves an amendment to the Road Traffic Offences (Motor Vehicles and Bicycles) (Sark) Regulations, 2014 to restrict the speed of all motor vehicles as defined under the Motor Vehicles (Sark) Law, 2013, rather than just tractors, on the specified public roads.**

**Conseiller Mike Locke**  
**Chair, Douzaine**

**DOUZAINE**

**Information Report to Christmas Chief Pleas, 21st January 2026**

**OPEN BURNING OF RUBBISH**

In previous reports to Chief Pleas at Michaelmas and Easter 2025, the Douzaine informed Chief Pleas that, due to rockfall, some tasks (including open burning) had been moved temporarily to Les Lâches. The road up to Les Lâches is not really suitable for the increased usage caused by regular rubbish carting. The long-term use of the site in this way would probably need a new road as has been mooted before.

However, returning open-burning to the Harbour Quarry is less than ideal, even with new burning pits. The Douzaine has had many representations about the smoke, fumes and negative visual impact on tourists queuing for the toastrack, enjoying the café and visiting the harbours. It's not pleasant for the public works team who have to carry out the burning and work down there.

The works to mitigate the rockfall risk had to be put back to 2027 because of budget – obviously stabilising La Coupée takes priority and plans are well advanced for that. But that meant the new cleaner-burning air-curtain incinerator also had to be delayed until 2027.

The Douzaine and the Public Works team have reviewed the situation of open burning up at Les Lâches using the current method of digging pits in the ground. It allows burning to be carried out on more days than just once a week. This makes it easier to reach high temperatures quickly which reduces ash and smoke. Rubbish is dumped directly from the trailer at ground level into the pit below which reduces the amount of handling and increases efficiency.

Lastly, there is room to dig a limited number – maybe 3 or 4 – more burning pits on the same site. That means Les Lâches is a more practical place to do open burning using pits than the Harbour Quarry; and can be used through 2026 and into 2027.

This burning is carried out taking into account the wind direction, to minimise impact on nearby residents, and the dryness of the surrounding land and vegetation to minimise fire risk. The Fire Service advised that the recent troublesome fire was not caused by the burning pits; rather it was from green waste that had been previously pushed over the cliff. This practice was discontinued at the beginning of the year.

The Douzaine therefore intends to continue open burning at Les Lâches for 2026. Further study continues on how to deal with all the rubbish generated with, on the one hand, the costs of shipping to and processing on Guernsey compared with the costs of dealing with more of it on Sark, along with the extra equipment that may be needed.

Further reports will be brought to Chief Pleas in due course.

**Conseiller Mike Locke**  
**Chair, Douzaine**

**DOUZAINE**

**Report with Proposition to Christmas Chief Pleas, 21<sup>st</sup> January 2026**

**CHANGE TO MANDATE**

Point 10 of the Douzaine's mandate states '*To be responsible, via Public Works, for the erection and maintenance of warning signs, direction signs and signposts, and to request funds from the Island Treasurer for those purposes*'.

As the Tourism Committee have now taken over the responsibility and budget for direction signs and signposts the Douzaine would like to remove reference to them from their mandate.

The Douzaine will still be responsible for the erection and maintenance of warning signs.

The Douzaine would also like to update their mandate to include the following legislation:

- 'The Transfrontier Shipment of Waste (Sark) Ordinance, 2019'
- 'The Motor Vehicles (Sark) Law, 2013 (Amendment) Ordinance, 2020'
- 'Road Traffic Offences (Motor Vehicle and Bicycles) (Sark) (Amendment) Regulations, 2021'
- 'The Electric Bicycles (Sark) Ordinance, 2019 (No V/2019)'

and to change 'P&P lead' for the Rotterdam Convention – Prior Informed Consent to 'P&F Lead'.

**Proposition 1 -**

**That Chief Pleas approves the amended mandate, as attached.**

**Conseiller Mike Locke  
Chair, Douzaine**

# **DOUZAINE**

## **MANDATE**

*The Douzaine was constituted by Resolution of Chief Pleas in October 1770*

### **CONSTITUTION:**

- Membership of seven Conseillers in accordance with Section 43 of The Reform (Sark) Law, 2008, as amended.
- Up to 2 non-voting members who shall not be sitting members of Chief Pleas but who shall be elected by Chief Pleas.
- A quorum shall be half of the number of Conseillers elected to the Douzaine, rounded up to the nearest whole number, but never less than three.

### **MANDATE:**

1. To nominate and propose to Chief Pleas the appointment of the Constable and Vingtenier after discussions with the then holders of those offices.
2. To nominate and propose to Chief Pleas the appointment of the Procureur and Deputy Procureur after discussions with the then holders of those offices.
3. To review the need and financial status of persons applying for financial assistance or residential care brought to the attention of the Douzaine by the Procureur des Pauvres. To allocate assistance as and when required from funds provided to the Procureur des Pauvres by the Island Treasurer. The Douzaine reserves the right to recover assistance given from the estate of any person receiving assistance.
4. To cause accurate accounts to be kept by the Procureur des Pauvres of all monies received and all expenditure incurred. The Douzaine shall scrutinise the accounts before they are submitted to the Treasurer for inclusion in the Financial Statements of the Island.
5. To maintain a register (the Cadastre) of property ownership and possession for the purpose of supplying the Island Tax Assessor with accurate records in accordance with the requirements of The Direct Taxes Law, 2002 and The Direct Taxes (General Provisions) (Sark) Ordinance 2003.
6. To be responsible, via Public Works, for the maintenance and cleaning of public roads, gutters, water-courses, paths, public toilets, public seats, and steps leading to the Island's bays and landing places, and to request funds from the Island Treasurer for those purposes.
7. To appoint, supervise and manage the Island's manual work force and to request funds from the Island Treasurer for their payment.
8. To ensure that Public Works correctly collects, manages and disposes of the Island's waste material and sewage and to request funds from the Island Treasurer for those purposes net of monies collected in respect of those services.
9. To be responsible, via Public Works, for the maintenance and repair of all Island machinery and equipment used for Public Works and Douzaine purposes.
10. To be responsible, via Public Works, for the erection and maintenance of warning signs, and to request funds from the Island Treasurer for those purposes.
11. To be responsible, via the Constables for ensuring that landowners correctly cut and maintain all hedgerows and banks bordering all Island roads.



12. To be responsible for advertising for tenders and placing contracts for the maintenance of Island property other than that under the control of the Island Trustees.
13. To be responsible for letting, appointing tenants, fixing rents and terms on property surplus to the requirements of the Douzaine. Income arising from and expenditure on Island Property to be recorded in the Island's Financial Statements.
14. To be responsible for the purchase and maintenance of Island trees, and to request funds from the Island Treasurer for those purposes.
15. To be responsible for everything concerning the Island cemeteries and adjacent land and to prepare for the future need for burial sites.
16. Together with the Seigneur to propose or approve all alienation of land for the benefit of the community.
17. To be responsible for the management, repairs and maintenance of properties delegated to the Douzaine by the Island Trustees.
18. To maintain the Register of Restricted Dwellings as required by The Housing (Control of Occupation) legislation.
19. To administer and issue licences for firearms, shotguns and ammunition under the Firearms (Sark) Law, 2001 and related Ordinances.
20. To liaise with the Chief Officer of the Guernsey Police on firearms matters.
21. To keep accurate records of all firearms held by licensees.
22. To keep accurate records of all licence fees received.
23. The regulation and licensing of all tractors and carriages and the testing and licensing of their drivers. The testing to be carried out by the Constable or an authorised tester.
24. The licensing of invalid carriages and their drivers, tested by the Constable or an authorised tester.
25. The regulation of the Harbour Hill Transport.

## **LEGISLATION**

See **Appendix 1**

## Appendix 1

### Laws

- Order in Council Alienation de terres dans l'île de Sark 1927
- The Housing (Temporary Provisions)(Sark) Law, 1976
- The Housing (Temporary Provisions)(Amendment)(Sark) Law, 1986
- The Reform (Sark) Law, 2008
- The Direct Taxes Law, 2002
- The Housing (Control of Occupation) (Sark) Law, 2011
- The Housing (Control of Occupation) (Sark) (Amendment) Law, 2013
- The Housing (Control of Occupation) (Sark) (amendment) Law, 2014
  
- The Firearms (Sark) Law, 2001
  
- Road Traffic (Horse-Drawn Vehicles)(Sark) Law, 1969
- Road Traffic (Horse-Drawn Vehicles)(Temporary Provision and Amendment)(Sark) Law, 1980
- Road Traffic (Horse-Drawn Vehicles)(Amendment)(Sark) Law, 1983
- Reform (Sark) Law, 2008 – Schedule 1
- Motor Vehicles (Sark) Law, 2013
- Road Traffic Offences (Motor Vehicles and Bicycles) (Sark) Law, 2013
- Road Traffic Offences (Motor Vehicles and Bicycles) (Sark) (Amendment) Law, 2015
- Road Traffic Offences (Motor Vehicles and Bicycles) (Sark) (Amendment No. 2) Law, 2015

### Ordinances

- The Direct Taxes (General Provisions) (Sark) Ordinance 2003
- The Cutting of Hedges (Sark) Ordinance, 2009
- The Housing (Control of Occupation) (Commencement and Prescribed Persons) (Sark) Ordinance 2014 (No. I/2014)
  
- The Shotguns (Sark) Ordinance, 1994
- The Firearms (Sark) Law, 2001 (Commencement and Fees) Ordinance, 2002
  
- The Refuse and Litter (Sark) Ordinance, 1983
- The Transfrontier Shipment of Waste (Sark) Ordinance, 2001
- The Transfrontier Shipment of Waste (Sark) Ordinance, 2019
  
- Road Traffic (Horse-Drawn Vehicles)(Sark) Ordinance, 1968
- Road Traffic (Horse-Drawn Vehicles)(Commencement) Ordinance, 1970
- Road Traffic (Horse-Drawn Vehicles)(Amendment)(Sark) Ordinance, 1972
- Road Traffic (Horse-Drawn Vehicles)(Amendment)(Sark) Ordinance, 1976
- Road Traffic (Horse-Drawn Vehicles)(Amendment)(Sark) Ordinance, 1977
- Road Traffic (Horse-Drawn Vehicles)(Amendment)(Sark) Ordinance, 1978
- Road Traffic (Horse-Drawn Vehicles)(Amendment)(Sark) Ordinance, 1980
- Road Traffic (Horse-Drawn Vehicles)(Amendment)(Sark) Ordinance, 1983
- Road Traffic (Horse-Drawn Vehicles)(Amendment)(Sark) Ordinance, 2002
- Road Traffic (Horse-Drawn Vehicles)(Amendment)(Sark) Ordinance, 2008
- Road Traffic (Horse-Drawn Vehicles)(Amendment)(Sark) Ordinance, 2010
- Road Traffic (Horse-Drawn Vehicles)(Amendment)(Sark) Ordinance, 2012
- The Motor Vehicles (Sark) Law (Commencement) Ordinance, 2014 (No. XV/2014)

- The Road Traffic Offences (Motor Vehicles and Bicycles)(Sark) Law 2013 (Commencement) Ordinance 2014 (No. **XVI/2014**)
- The Road Traffic (Constitution of Tribunal) Ordinance, 2014 (No. **XVII/2014**)
- The Road Traffic Offences (Motor Vehicles and Bicycles)(Sark) Amendment Law, 2015 (Commencement) Ordinance 2016 (No. **II/2016**)
- The Motor Vehicles (Sark) Law, 2013 (Amendment) Ordinance, 2020
- The Electric Bicycles (Sark) Ordinance, 2019 (No **V/2019**)

## Regulations

- The Motor Vehicles (Sark) Regulations, 2014
- Road Traffic Offences (Motor Vehicles and Bicycles) (Sark) Regulations, 2014
- The Motor Vehicles (Sark) (Amendment) Regulations, 2015
- Road Traffic Offences (Motor Vehicles and Bicycles) (Sark) (Amendment) Regulations, 2021

## Conventions

- Rotterdam Convention – Prior Informed Consent (**P&F lead**) (previously P&P) lead
- Basel Convention – Transboundary Shipment of Hazardous Waste
- London Convention and Protocol on Marine Pollution
- EUCARIS treaty on Driving Licenses

## Agreements

- MoU between the Sark Firearms Committee, The Sark Constable & The Guernsey Police.
- Motor Insurers Bureau

**POLICY & FINANCE COMMITTEE**

**Report with Propositions to Christmas Chief Pleas, 21st January 2026**

**APPOINTMENT OF TAX ASSESSOR AND DEPUTY TAX ASSESSOR**

In accordance with *The Direct Taxes (Sark) Law, 2002* an advertisement was placed for the roles of Tax Assessor and Deputy Tax Assessor. A Panel interviewed three candidates for the roles. The Panel recommended that Angela Lewis be appointed as Tax Assessor for a two-year term and Gemma Knight be appointed as Deputy Tax Assessor for a one-year term.

As recommended by the Panel the Policy & Finance Committee would like to put forward Angela Lewis for the position of Tax Assessor for the Island of Sark and Gemma Knight for the position of Deputy Tax Assessor for the Island of Sark.

The Policy & Finance Committee would like to put on record its appreciation, and that of Chief Pleas, to Simon de Carteret upon his retirement for his many years of service, first as Assistant Tax Assessor from January 2013 and then as Tax Assessor from January 2014.

**Proposition 1 -**

**That Chief Pleas approves the appointment of Angela Lewis to the position of Tax Assessor for the Island of Sark.**

**Proposition 2 -**

**That Chief Pleas approves the appointment of Gemma Knight to the position of Deputy Tax Assessor for the Island of Sark.**

**Conseiller John Guille**  
**Chairman, Policy & Finance Committee**

**TOURISM (INCL. PUBLIC HEALTH) COMMITTEE****Information Report to Christmas Chief Pleas, 21st January 2026****ANNUAL REPORT****Sark Tourism Report to Chief Pleas - 2025****Introduction**

Sark Tourism is pleased to present this report to Chief Pleas, summarising the achievements, activities and strategic direction of the island's tourism sector in 2025. The past year has seen significant developments across visitor services, marketing, digital platforms and event coordination.

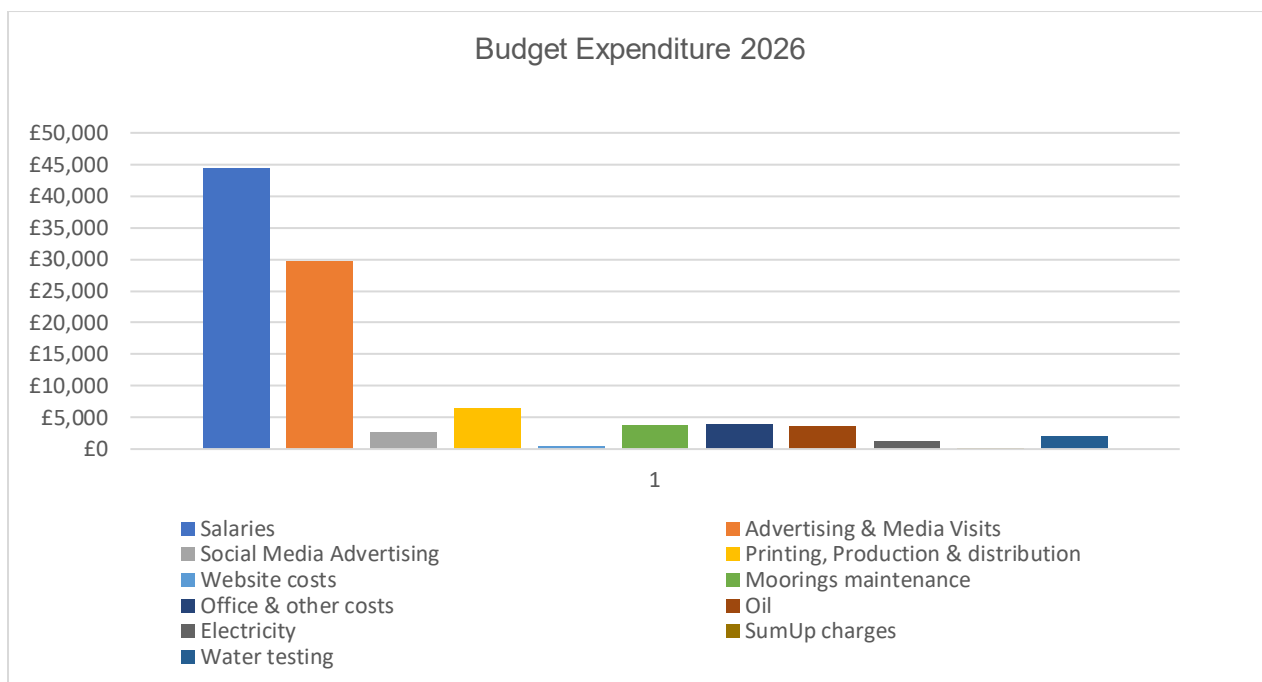
2025 has been a year of strengthening our networks, expanding our digital presence and preparing for an ambitious programme of events and marketing initiatives in 2026 and beyond. These efforts aim to position Sark as a vibrant and accessible destination for both domestic and international visitors.

**Budget Overview**

The current Tourism Committee inherited the 2025 budget along with its commitments. These allocations were established prior to the committee's tenure and reflect previously agreed priorities and obligations. Looking toward 2026, we have shaped the new budget to allow the committee to focus on initiatives aligned with our vision and strategic goals. This transition will provide greater flexibility to introduce fresh ideas and enhance the impact of our programs.

Tourism and Public Health Budget:

Year	Provided by Chief Pleas (£)	Income from Visitor Centre (£)	Total Budget (£)	YoY Δ (£)	YoY Δ (%)
2026	£72,394	£25,742	£98,136	£4,152	-4.06%
2025	£81,126	£21,162	£102,288	+£4,418	+4.51%
2024	£72,870	£25,000	£97,870	£5,812	-5.61%
2023	£72,682	£31,000	£103,682	+£3,032	+3.01%
2022	£80,935	£19,715	£100,650	—	—



## Advertising and Media Activities



### Sark Visitor Guide 2024/25 and Map

In 2025, 10,000 brochures and 20,000 maps were printed. Digital versions were also made available on the Tourism website, with the Visitor Centre actively encouraging downloads. Moving forward, printed brochures will be phased out in favour of a more interactive digital version.

The new map is a compact A6 design folding out to A2, featuring enhanced detail, larger print and advertising panels. A variety of advertising options are available, including discounted packages, combination offers and social media promotions. Participation is encouraged from all local businesses and organisations as wider advertising benefits the entire island community.

Revenue generated from advertising covers production costs and any surplus contributes to the overall Tourism budget, directly supporting the promotion of Sark.

### Advertising Activities

In 2025, Sark Tourism advertised across multiple publications including Petit Futé, Discover Britain, Britain Magazine, British Travel Journal, Countryfile, Aurigny, Jersey Cruising Guide, Coast Magazine and Family First Travel Supplement.

Additional campaigns included:



- A large advertisement for the ferry terminal doors in Guernsey.
- A TV advert aired on ITV targeting both Guernsey and Jersey, along with targeted online platform advertising through ITVX.
- Distribution of Sark-themed pins at the Island Games.

Collaborative advertising with Sark Shipping was undertaken to maximise exposure while minimising costs. Looking ahead, coordination with Sark Shipping and Visit Guernsey will continue to focus on digital advertising, social media campaigns and press releases to achieve maximum impact for the 2026 budget.

### Media and Tour Operator Assistance

Assistance was facilitated for tour visitors from a multitude of jurisdictions including France, Germany and Sweden amongst others whilst Sark Tourism supported a television production scheduled to air on Channel 4 in early 2026 and coordinated a feature on French TV highlighting Sark School.

Sark Tourism would like to extend its sincere thanks to Christopher and Sarah Beaumont for their continued efforts and dedication in facilitating media requests and in promoting Sark at every opportunity. Their hospitality at La Seigneurie has been a highlight and has played an important role in showcasing the island at its very best.

### Media Visits

In 2025, 26 journalists from the UK, France, and Germany visited Sark. Visits were coordinated with Visit Guernsey and their PR firm, Orchard. Visitor Centre staff and Committee members welcomed journalists, providing comprehensive information packs.

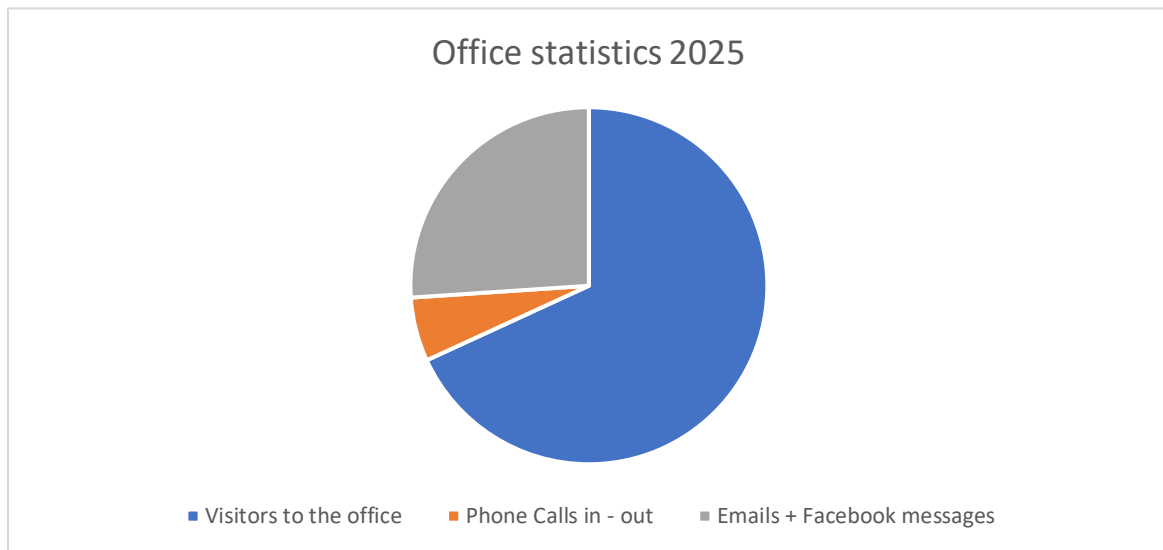
Committee members also engaged with local media on topics including the Sark Sheep Race, the launch of the Strike book authored by Robert Galbraith, a.k.a. JK Rowling, The Hallmarked Man, the eighth book in the Strike series in which the two main characters visit Sark, and La Coupée, amongst others.

### Visitor Centre

In 2025, the Sark Visitor Centre increased its operational hours to seven days a week peak season to meet visitor demand and was staffed by a dedicated team of three. Sadly, during the year we lost the Senior Visitor Officer who we thank for her service and input. We would also like to thank Jane Armorgie and Elsie Courtney for their exceptional combined efforts in covering this period. Their commitment ensured continuity of service while recruitment for a new role within the team took place.

The new position was created with a more concentrated focus on digital engagement and content development, reflecting the evolving needs of Tourism on Sark. This role was successfully filled by George Timpson, who has done a fantastic job since joining the team, bringing new skills and covering a range of digital and creative aspects that were not previously addressed. Working alongside consultant Rosalie La Trobe-Bateman - whose comprehensive knowledge of Sark and strategic digital guidance

continues to be invaluable - this strengthened team has significantly enhanced the Visitor Centre's contribution to Sark Tourism and its digital presence.



#### Projects Undertaken in 2025:

##### The War Years Exhibition

Opened in 2020, this exhibition remains popular and will continue indefinitely.

##### QR Codes

Introduced in 2019, QR codes across the island are regularly maintained to ensure they remain functional.

##### Signage

Minimal maintenance was required for directional signposts though island-wide replacements are under investigation. New A0 map signs have been commissioned for the Harbour and La Collinette in early 2026 and A4 versions are being considered for businesses.

##### Procedures and Processes

Internal processes were reviewed and updated, including the introduction of an improved complaint-handling procedure. Press releases and trade mailers were distributed throughout the summer to keep the sector updated.

##### Shop

The Visitor Centre shop explored new stock lines and plans a redesign in 2026, focusing on locally sourced and sustainable products. The shop remains a valuable contributor to offsetting the Tourism budget.

## Sark's First Stamp Collection

2025 marked a historic milestone with the launch of Sark's first official postage stamp collection, issued under the postal administration of Guernsey. This significant achievement placed Sark among a very small number of islands to issue its own stamps and has been met with strong interest from collectors. The inaugural collections celebrated Sark: Occupation and Liberation and Wildflowers in Sark, showcasing both the island's wartime resilience and its exceptional natural environment.

Themes for 2026 have now been finalised, with the first collection already completed and the second currently underway. Building on the success of the stamp programme, we also hope to enter the commemorative coin market later this year, further expanding Sark's presence within the global collectibles and heritage markets and creating new opportunities to promote the island internationally.

## Liberation 80

Sark proudly marked the 80th Anniversary of its Liberation with a weekend of unforgettable events that celebrated the island's history, community, and spirit. Visitors and residents joined in a programme that ranged from solemn remembrance, including the lighting of the V.E. Day Beacon, to joyful celebrations with live music, a street party and cultural performances. The island was honoured by the visit of Her Royal Highness The Princess Royal and warmly welcomed international guests, including a French delegation from the Département of La Manche and a UK Minister.

The weekend highlighted Sark's resilience, heritage and welcoming community, offering visitors a chance to experience the island at its very best. Sark Tourism extends heartfelt thanks to the Liberation organising committee and all those who contributed to making the celebrations such a memorable and inspiring occasion, showcasing Sark's rich history and vibrant culture to the world.

## **Forward Focus**

### Event-Based Tourism

The Visitor Centre team will be increasing its focus on event-based tourism in 2026, with the aim of developing a comprehensive events calendar for the island. We look forward to actively promoting and advertising all events, ensuring that both residents and visitors are fully informed of the exciting activities taking place across Sark. To support this initiative, we encourage all event organisers and stakeholders to keep the Visitor Centre team updated on forthcoming events so that they can be included in our coordinated promotional efforts.

### Twinning: Sark & Port-Bail-sur-Mer

Sark has expressed interest in exploring an official twinning (jumelage) partnership with Port-Bail-sur-Mer. Both communities share a rich maritime heritage, small and

closely-knit populations, deep historical roots and economies reliant on tourism, making this a natural and meaningful connection.

Shared Strengths Include:

- Strong maritime heritage and fishing traditions
- Small, engaged, and community-focused populations
- Tourism-driven economies
- Unique cultural and historical heritage
- Local governance rooted in community participation
- Opportunities for youth and school exchanges
- Shared environmental values, particularly in coastal conservation

A twinning partnership could provide opportunities for cultural events, educational exchanges, joint tourism initiatives, environmental collaborations, and strengthened community-to-community connections.

Sark has proposed an initial meeting with Port-Bail-sur-Mer to explore shared goals and discuss next steps toward a formal twinning charter. Further updates will be provided as discussions progress.

#### Toilers of the Sea Anniversary 2026

2026 also marks the significant anniversary of *Toilers of the Sea* by Victor Hugo, a literary work closely associated with the Channel Islands. Sark is believed to have influenced some of the imagery and atmosphere portrayed in the novel and this presents an opportunity to celebrate and highlight the island's cultural and literary connections. Sark Tourism hopes to use this anniversary to develop themed content and experiences that draw on this association, helping to inspire visitors and further position Sark as a place of creative and historical significance.

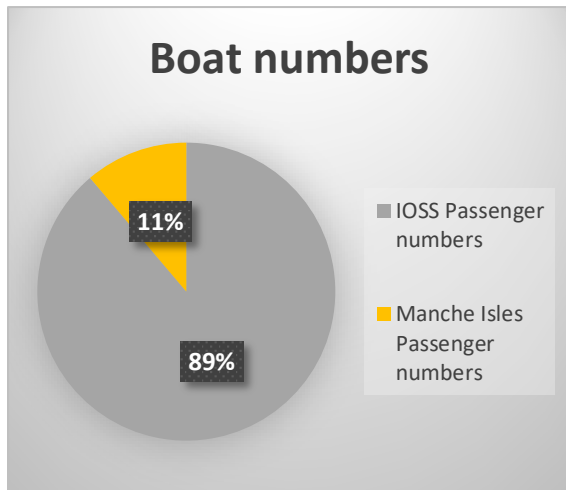
#### Millennium 2027 – European Year of the Normans

Sark is proud to play a part in the Millennium 2027 – European Year of the Normans, a major Europe-wide celebration marking 1,000 years of Norman heritage. The island's landscapes, historic architecture, and enduring traditions are deeply rooted in this shared past, and Sark Tourism is developing a programme of Sark-specific activities and events for 2027 to bring our Norman story to life. Planned initiatives include heritage walks, cultural storytelling, and locally led experiences designed to connect visitors with Sark's unique history.

Efforts will continue to raise awareness of Sercquaise within the community, recognising it as a vital part of Sark's cultural heritage. Sark Tourism is grateful for the support of Martin Neudörfl, whose expertise has helped strengthen understanding and appreciation of the island's unique language as part of its wider Norman identity.

Sark's involvement ensures that our distinctive heritage is represented within the wider Bailiwick and European celebrations, working in partnership while maintaining a clear and authentic local voice. This initiative also presents an important opportunity to attract culturally motivated visitors and to showcase Sark's rich historical identity on a broader international stage.

## Visitor Statistics



### Sark Shipping

Sark Tourism would like to extend its sincere thanks to Mark Roffey and the team at Sark Shipping for their continued efforts, dedication and unwavering commitment to providing a vital lifeline service to the island. We recognise that maintaining this service can be challenging at times, yet their professionalism and perseverance ensure Sark's resilience, connectivity and ongoing accessibility for residents and visitors alike. Mark's input from a marketing and promotional perspective has also been

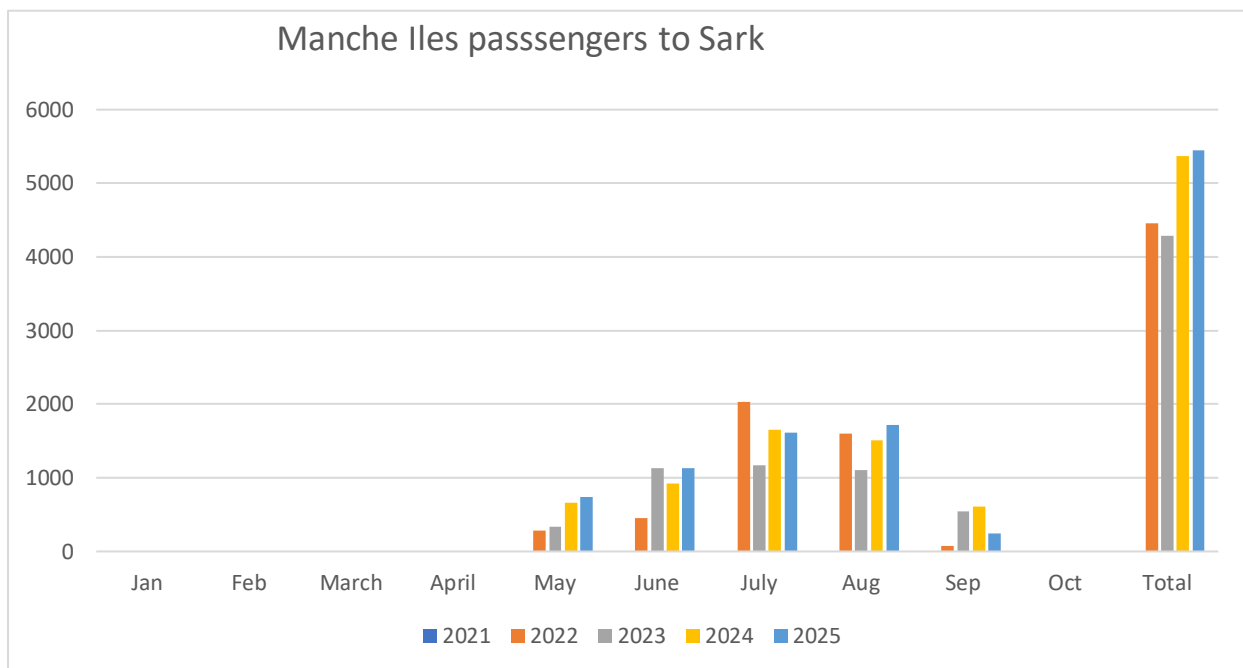
welcomed and saw the new advertising board located by the Clock Tower and the promotional adverts located on the doors of the Ferry Terminal building.

Passenger numbers from Guernsey were slightly down in 2025. While cancellations were difficult to quantify, plans for 2026 are underway, including event support coordination and ticket discounting. Tourism looks forward to working closely with Sark Shipping to promote the island, encouraging domestic visitors to rediscover Sark and attracting increased continental visitors, particularly from France, capitalising on international visitor growth via Brittany Ferries.

Detailed passenger numbers will be provided by IOSS when they provide a full report to the Harbours, Shipping & Pilotage Committee.

### Manche Îles

Sark Tourism would also like to record its sincere thanks to Manche Îles Express and to President Morin of the Département de la Manche for their continued support and commitment to the Manche Îles Express service. This vital sea link plays an important role in strengthening connectivity between France and the Channel Islands, including Sark, and in supporting both tourism and wider cultural and economic ties. The success of the service reflects a shared commitment to collaboration, effective promotion and accessible travel, supported by positive partnerships across the Bailiwick and with operators such as Brittany Ferries. Sark Tourism greatly values this ongoing cooperation and looks forward to continuing to work closely with Manche Îles Express; between May and September, Manche Îles operated 37 sailings, carrying 5,454 passengers.



### Cruise Ship Visitors

Cruise ship visits decreased in 2025. In 2026, efforts will focus on providing cruise operators with early visitor information to encourage more calls to Sark.

### 12 and Under Operators

Sark Tourism would also like to acknowledge and thank the 12-and-under charter service providers who have been able to offer flexible and responsive services that complement the scheduled ferry operations of Sark Shipping and Manche Îles. These operators have played an important role in maintaining connectivity, particularly when weather conditions or scheduling challenges have made travel more difficult. We are equally grateful for the continued services provided by the carters and Harbour Hill Transport, whose reliability and support remain essential to the smooth movement of visitors and goods on the island.

## **Digital Platforms and Marketing**

### Social Media and Digital Presence

Sark Tourism is grateful to its consultant, Rosalie La Trobe-Bateman, for her input across all Sark Tourism digital platforms. Her comprehensive knowledge of 'all things Sark', combined with strategic guidance for future initiatives, has been instrumental in shaping the Tourism strategy; alongside George Timpson at the Visitor Centre, this collaboration has set the foundation for exponential growth across all digital channels.

In 2025, there has been a focused effort to increase engagement across all social media platforms. In August, Sark Tourism expanded to TikTok and YouTube, complementing existing platforms to reach a broader audience and inspire future



visits. The 2026 project will focus on unified branding of Sark across all platforms, alongside coordinated efforts with stakeholders to drive steady growth and promote the Island of Sark.

### Facebook

For the period 1st January to 31st October 2025, Facebook statistics are as follows:

- Views, interactions, and follows showed a strong increase.
- Of all interactions, 53% came from non-followers, while 47% came from followers.
- October marked Sark Tourism's first viral post, significantly increasing engagement.



### Instagram

From 13th August to 30th November 2025:

- 185,365 views
- 19,600 accounts reached
- 540 new follows

### TikTok

As a newly established platform, TikTok statistics from 13th August to 30th November 2025 were:

- 130,000–135,000 views
- 950 new follows

### YouTube

The YouTube channel was launched in August 2025 and is currently under development. For 2026, content contributions from a range of island participants are planned to enrich the channel and showcase Sark from multiple perspectives.

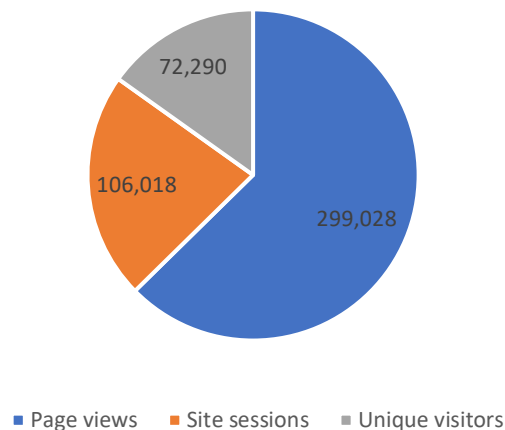
## Tourism Website

Since the launch of the new Tourism website in July 2023, the platform has shown steady growth. New sections have been added, including a Partners tab, while existing sections have been enhanced with additional information to improve user experience and accessibility.

Charts below show the website statistics from the period 1<sup>st</sup> January to end November 2025.

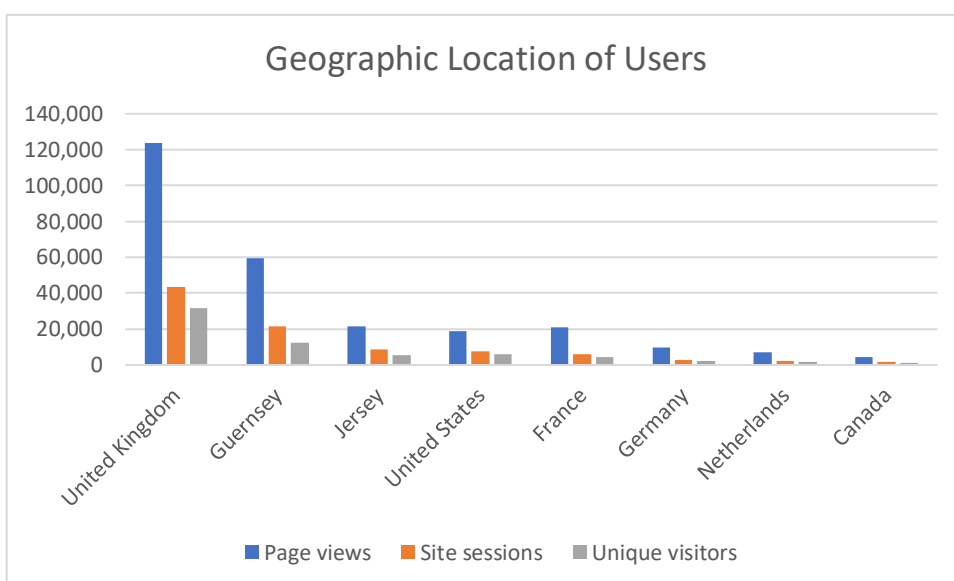
## Website Data

New vs Returning Users



New users spend an average of 5m15s on the site and returning users spend an average of 6m21s on the site. The bounce back rate is 57-58%.

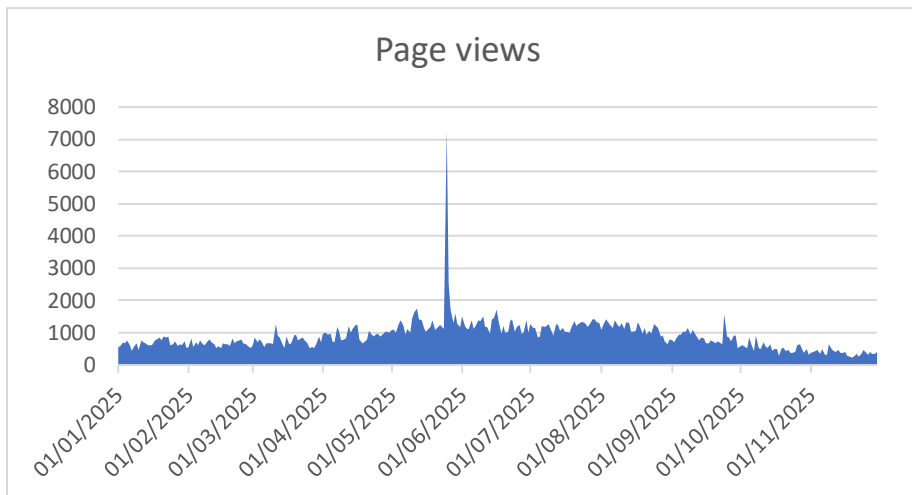
Geographic Location of Users



Location: The Geographic location of the website users.

The majority of the users are located in the UK, followed by Guernsey.

This map shows the wider locations of users:



Page views: This chart shows pages views throughout the year.

## **Conclusion and Forward Planning**

Visitor trends in Guernsey remain crucial, as the majority of visitors travel to Sark via Guernsey, creating a direct correlation with Sark's visitor numbers. The average length of stay decreased to 4.7 nights in 2025, mirroring trends on Sark. While longer-stay visitors bring the most economic benefit, day-trippers from Guernsey continue to contribute positively.

Sark Tourism will continue to work closely with Visit Guernsey to promote the island for both holidays and day-trip activities. A public meeting is planned for early 2026, with events for 2026 and 2027 already in development. Event organisers are encouraged to liaise with Tourism at the earliest planning stages, and coordinated marketing with Sark Shipping will provide cost-effective promotion.

A strong focus on digital platforms is expected to deliver further benefits, reaching wider audiences and inspiring future visits. Combined with a robust network of local, regional, and industry connections, Sark Tourism is well placed to drive growth and engagement as we move into 2026.

**Conseiller Natalie Tighe**  
**Chairman, Tourism (incl. Public Health) Committee**

**DEVELOPMENT CONTROL COMMITTEE**

**Information Report to Christmas Chief Pleas, 21st January 2026**

**ANNUAL REPORT**

The Committee has held twelve monthly meetings and, in order to give consistency, meetings are normally set for the second Monday of each month; the deadline for applications is always at midday on the previous Thursday before the meeting.

There was one extraordinary meeting held this year to discuss operations and general policy.

An average of eight applications requiring a decision has been considered at each meeting during 2025.

There have been three formal site visits when at least three Committee members visited one or more of the application sites. In addition to the formal site visits, there have been numerous informal site visits, where one or more Committee member visits the application site at a time that is convenient to them, discussion and decisions being made at the next Committee meeting.

There is a rolling agenda open between meetings and as new applications are received they are added to the appropriate section. Similarly, applications with conditions attached to the decision are monitored during the month and the Committee is advised if circumstances change and progress can be made ahead of the next meeting.

The application form has been simplified for ease of use.

A list of all decisions made at each meeting is prepared and posted in the public boxes and included on the government website; all new applications are available in the Committee Office for inspection between meetings as are all the letters sent out from the Committee following the action taken at a meeting.

This year there has been no occasions on which the Appeals Tribunal have been required.

A portion of the Committee's time is spent in considering the Laws and Ordinances it administers, noting where they are deficient or no longer relevant. In the year 2025 the Committee did not bring any new legislation before Chief Pleas.

**Conseiller Mary Nicolle**

**Chair, Development Control Committee**

SARK STATUTORY INSTRUMENT

2025 No. 2

**The Motor Vehicles (Amendment) (Sark) Regulations,  
2025**

<i>Made</i>	20 <sup>th</sup> November, 2025
<i>Coming into operation</i>	, 2025
<i>Laid before the Chief Pleas</i>	, 2025

THE SARK CHIEF PLEAS DOUZAINÉ, in exercise of the powers conferred on it by sections 6, 17, 21, 22, 24, 26, 29, 30B and 41 of the Motor Vehicles (Sark) Law, 2013<sup>a</sup>, and all other powers enabling them in that behalf, hereby orders:-

**Amendments to Regulations.**

1. The Motor Vehicles (Sark) Regulations, 2014<sup>b</sup> ("the Regulations") are amended as follows.

2. In regulation 2, for "£100" substitute "£300".

3. In regulation 8, for "£10" substitute "£20".

4. In regulation 11 -

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<sup>a</sup> Order in Council No. XV of 2013; this enactment has been amended.

<sup>b</sup> Sark Statutory Instrument No. I of 2014.

(a) the second subparagraph (b) is renumbered as (ba), and

(b) subparagraph (c) is revoked.

5. After regulation 11 insert –

**"Electric bicycle licences: fees."**

11A. For the purposes of section 30B of the Law, the fee for the grant and renewal of an electric bicycle licence is £18."

6. In regulation 12(2), in both places it appears, for "£100" substitute "£300".

7. In Schedule 1, for "£100" in each place where it appears substitute "£300".

8. In Schedule 2, for "£10" in each place where it appears substitute "£20".

9. In Schedule 4, delete "(INCLUDING ELECTRIC BICYCLES)" in each place where it appears.

10. For Schedule 5, substitute the Schedule set out in Schedule 1 to these Regulations.

11. In Schedule 6, for "£100" in each place where it occurs substitute "£300".

12. After Schedule 7, insert Schedule 8 set out in Schedule 2 to these Regulations.



**Citation.**

13. These Regulations may be cited as the Motor Vehicles (Amendment) (Sark) Regulations, 2025.

**Commencement**

14. These Regulations shall come into force on the 1<sup>st</sup> January, 2026.

Dated this 20<sup>th</sup> day of November, 2025



MIKE LOCKE

Chairman of the Douzaine

For and on behalf of the Douzaine

SCHEDULE 1

Regulation 10

"Regulation 9

SCHEDULE 5

SARK DOUZAINÉ

INVALID CARRIAGE DRIVING LICENCE APPLICATION FORM

1. Name
2. Address and contact telephone number
3. Date of birth

*I enclose:*

- (i) *a fee of £20,*
- (ii) *a copy of my invalid carriage driving competency test pass certificate,*  
*and*
- (iii) *a copy of a doctor's certificate relating to my need for an invalid carriage.*

Signed:

Dated:

**SARK DOUZAINÉ**  
**INVALID CARRIAGE DRIVING LICENCE RENEWAL FORM**

1. Name
2. Address and contact telephone number
3. Date of birth
4. Number of current invalid carriage driving licence

*I enclose a fee of £20,*

**AND**

*I enclose a copy of a doctor's certificate relating to my need for an invalid carriage.*

**OR**

*I declare that the Sark Chief Pleas Douzaine may contact my doctor to confirm that I still need to use an invalid carriage.*

*(delete as appropriate)*

Signed:

Dated:

**SARK DOUZAINÉ**  
**TEMPORARY INVALID CARRIAGE DRIVING LICENCE APPLICATION**  
**FORM**

1. Name
2. Address and contact telephone number
3. Date of birth
4. Period of use of invalid carriage (maximum 3 months)

From:

To:

*I enclose a copy of a doctor's certificate relating to my need for an invalid carriage.*

Signed:

Dated:

"

SCHEDULE 2

Regulation 12

"Regulation 11A

SCHEDULE 8

**SARK DOUZAINÉ**

**ELECTRIC BICYCLE LICENCE APPLICATION/RENEWAL FORM**

1. Name
2. Address and contact telephone number
3. Date of birth
4. Description of electric bicycle, including make, model and maximum power.

*I enclose a fee of £18.*

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## EXPLANATORY NOTE

*(This note is not part of the Regulations)*

These Regulations amend the fees payable in respect of tractor licences, tractor driving licences, construction vehicles and electric bicycle licences.

These Regulations will come into force on the 1<sup>st</sup> January 2026.



## COMMISSIONER FOR STANDARDS - STATEMENT FOR SARK

1. The Commissioner for Standards ("the Commissioner") investigates complaints of alleged breaches of the Code of Conduct for Members of the Chief Pleas of Sark ("the Code"). The Commissioner considers complaints made by third parties and can also initiate her own investigation if she believes that, at a relevant time, a breach of the Code may have occurred. A Member of the Chief Pleas of Sark ("Member") can also request that their own behaviour is investigated by the Commissioner to establish whether there has been a breach of the Code.

### Complaints

2. Whether the complainant is a member of the public or a Member of the Chief Pleas, they may wish to consider whether it might first be useful, if appropriate, to try to resolve their complaint informally.
3. Any complaint alleging that a Member of the Chief Pleas has breached the Code must be made in writing to the Commissioner via one of the following means:
  1. By email: [commissioner@pi-cfs.org](mailto:commissioner@pi-cfs.org)
  2. Online via the website: <https://pi-cfs.org>
  3. By post to: Commissioner for Standards, c/o Committee Office, La Chasse Murette, Sark, GY10 1SE
4. In order for a complaint to be considered it should:
  - a. be made in writing;
  - b. state the name of the complainant;
  - c. state the email, telephone and postal address of the complainant (unless the complainant is a current Member);
  - d. name the person who is the subject of the complaint;
  - e. state the acts or omissions of the Member complained of which are alleged to have breached the Code;
  - f. state the relevant provision or provisions of the Code which each act or omission is alleged to have breached;
  - g. in relation to each act or omission complained of, be substantiated by sufficient evidence that there is a *prima facie* case that a breach of the Code has occurred and that the complaint is not frivolous or vexatious or otherwise an abuse of the complaints process; and
  - h. relate to alleged conduct which falls within the scope of the Code.

5. The Commissioner has the discretion to consider a complaint even where c, e, f or g in the above criteria haven't been met.

### **Preliminary Assessment**

6. The Commissioner will conduct a preliminary assessment of all complaints. The Commissioner cannot consider complaints that fall outside the scope of the Code or complaints which she deems frivolous or vexatious. She will not consider complaints that substantially repeat allegations which have already been the subject of consideration (unless there is fresh evidence in their support).
7. The Commissioner will not consider anonymous complaints<sup>1</sup> or complaints where the complainant is not prepared to have their name and complaint disclosed to the Member complained about. The complainant's details will be included in all correspondence including any report submitted to the Policy & Finance Committee or Chief Pleas with the exception of complaints that relate to unacceptable behaviours (see 10 below).
8. Matters falling within the Commissioner's remit include:
  - a. failure to adhere to the requirements of the Code;
  - b. failure to register relevant interests;
  - c. failure to declare relevant interests in the course of parliamentary business including committee proceedings;
  - d. unacceptable behaviour including bullying, harassment, sexual harassment, intimidation and victimisation.
9. Matters not falling within the Commissioner's remit include:
  - a. policy matters or a members' political views or opinions;
  - b. service or performance standards or outcomes received (other than in exceptional circumstances);
  - c. a complaint from a person who is not a Member of Chief Pleas regarding words spoken by, or actions of, a Member during a meeting of the Chief Pleas;
  - d. a complaint about a former Member of Chief Pleas (unless in relation to sections 22, 23 and 24 (confidential information)).

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<sup>1</sup> *The Commissioner is statutorily barred from investigating anonymous complaints. Notwithstanding this exclusion, the Commissioner may consider anonymous complaints where they provide corroborating evidence for admissible complaints.*

## **Complaints Relating to Unacceptable Behaviour**

10. Unacceptable behaviour can be defined as any form of unwanted, unreasonable and offensive conduct that has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment. Conduct shall be regarded as having this effect only if, having regard to all circumstances and in particular the complainant's perception, it should reasonably be considered as having that effect.
11. Complaints relating to bullying, harassment, sexual harassment, intimidation and victimisation are intended to address such behaviour or conduct whether it occurs in person or remotely, for example by email, phone, text or through social media. Such behaviour or conduct may occur in a single and isolated serious incident or in multiple incidents occurring over a period of time.
12. Members have a right to freedom of expression and this includes disagreements on issues and policy which are a normal part of the political process.
13. Due to the sensitive nature of complaints concerning unacceptable behaviour, the Commissioner will not normally disclose the complainant's name or details in the final report of any such investigation, unless the complainant has expressly agreed to such disclosure.
14. The Commissioner encourages anyone who believes they have experienced unacceptable behaviour to consider using an informal approach to resolve the matter in the first instance. However, this is not a prerequisite for submitting a formal complaint.

## **Discontinuation of a Complaint**

15. The Commissioner may discontinue consideration of a complaint if at any time she is satisfied that:
  - a. the complaint is frivolous or vexatious or otherwise an abuse of the complaints process;
  - b. the complainant has, without reasonable excuse, failed to co-operate with the Commissioner;
  - c. the alleged conduct is not sufficiently serious to justify further consideration;
  - d. the complainant no longer wishes to bring the complaint;
  - e. the complaint would more appropriately be investigated by the police or other public body;
  - f. it is not in the public interest to proceed with the consideration of the complaint; or
  - g. any Member, in respect of whom she is considering a complaint, no longer holds office as a Member of Chief Pleas (unless in relation to sections 22, 23 and 24 (confidential information)).

## **Investigation: Procedural Safeguards**

16. The Commissioner determines the procedure and timing of any investigation.
17. The Commissioner will make arrangements to facilitate any complainant who is not able to submit their complaint in writing, for example due to disability or language difficulties.
18. Confidentiality is essential for all parties involved in the complaints process. This includes not only the person making the complaint but also the individual against whom the allegation has been made. Given their public roles, Members may be particularly concerned about unproven allegations being disclosed or repeated publicly before a full investigation has taken place. In the interests of fairness, any complaint submitted to the Commissioner must remain private and confidential from the point of submission until the matter has been fully determined, unless disclosure is expressly authorised. For example, disclosure may be necessary if the complainant is a Member who must declare an interest, such as having submitted a complaint to the Commissioner.
19. Information collated in relation to complaints will be held and managed in accordance with the [Data Protection \(Bailiwick of Guernsey\) Law, 2017, as amended](#) and Data Protection principles.
20. The police and other agencies investigate allegations of criminal misconduct and the Commissioner will not investigate any related allegation of a breach of the Code while the police or other agency is conducting its own investigation. The same suspension of investigation applies while related proceedings (for instance any action for defamation) are before a court of law.
21. Where during an investigation the Commissioner decides that the conduct of a Member of Chief Pleas should be investigated by the police or other public body or agency, the Commissioner may liaise with the police or such other public body or agency as they deem appropriate.
22. In investigating and adjudicating allegations of non-compliance with the Code, the Commissioner shall act in accordance with the principles of natural justice and fairness.
23. Proceedings are not adversarial, but inquisitorial in nature. The Commissioner is an independent and impartial investigator appointed by Chief Pleas, whose task is to establish the facts of a case. She reports these, along with her conclusions as to whether or not there has been a breach of the Code and her recommendations, to the Greffier.
24. The Commissioner's conclusions and recommendations are binding.
25. Members are expected to co-operate with any investigation into their conduct; requested written evidence must be in their own name and letters sent on their behalf by legal advisers or others may be disregarded. Members may be accompanied to any meeting or interview by a colleague, friend or legal adviser.

However, every effort is made to keep proceedings informal and there is no expectation that they should be so accompanied. If a Member chooses to bring a colleague, friend or adviser, they are free to consult him or her off the record, but they will be expected to answer for themselves (and not through the friend or adviser) any questions put to them.

26. The complainant has no formal *locus* once an investigation is under way and has no right to be called as a witness. The complainant is expected to co-operate with any investigation and to answer any questions and supply all evidence in his or her possession when asked to do so.
27. Members accused of misconduct have no entitlement to cross-examine complainants, though they are given an opportunity to review and challenge the Commissioner's findings of fact prior to finalising her report.
28. The civil standard of proof is adopted at all stages in the investigation process by the Commissioner. Therefore, in order to find against a Member, the Commissioner needs to be satisfied that the allegation is proven on the balance of probabilities, that is, "more likely than not".

### **Confidentiality**

29. From the point that the Commissioner receives a complaint, all evidence and correspondence relating directly to the inquiry must remain confidential unless and until it is published by the Greffier.

### **Investigations: General Procedure**

30. On receipt of a complaint, the Commissioner will write to the complainant at the earliest opportunity to acknowledge receipt of their complaint. At the same time, she will send a copy to the Greffier and will inform the Member concerned of the complaint and provide a copy of the complaint and any evidence offered in support of it. At the same time she will often invite the Member to respond in writing with a full and accurate account of the matters in question.
31. Following her preliminary assessment, the Commissioner will inform both the complainant and the Member concerned whether or not she will investigate the complaint. If she has decided that the complaint does not merit investigation, she will provide the complainant and the Member concerned with a brief explanation of her reason(s) for dismissing the complaint. This will be copied to the Greffier who will retain the copy in confidence for the length of the Members' service and five years thereafter.
32. Where the Commissioner finds that a complaint has been substantiated but is of the view that the breach of conduct was of a minor nature, she will normally dispose of the matter by cautioning the Member concerned. A report of the Commissioner's decision in such cases shall be sent to the Greffier for forwarding to the Policy & Finance Committee, which will place the report for information before the Chief Pleas of Sark at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. The Commissioner will inform the complainant of the

action taken in response to the complaint.

33. Alternatively, the Commissioner may decide to agree remedial action with the Member. Remedial action may be agreed if the complaint, though justified, is minor and is acknowledged by the Member concerned. Remedial action involves “putting the record straight”, for instance by making an amendment to the Register of Interests of Members. The Member will normally be expected to make a formal apology, either in writing or by means of a formal statement to Chief Pleas. If the Commissioner and Member agree remedial action, the Commissioner will make a report of the matter and remedial action to the Greffier for forwarding to the Policy & Finance Committee, which will place the report for information before the Chief Pleas of Sark at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. The Commissioner will inform the complainant of the action taken in response to the complaint.
34. If remedial action is not considered appropriate by the Commissioner in the circumstances, and the Member’s response is not sufficient to enable the Commissioner either to dismiss the complaint or agree remedial action, the Commissioner may pursue an investigation. This can include seeking further information, either from the Member concerned or others, including the original complainant, third parties, or public or private bodies. Such information may be sought in writing or the Commissioner may decide to interview witnesses either informally or by means of formal oral evidence. The Commissioner holds her meetings with witnesses in private. In the case of informal interviews, a note will be made of the meeting and all parties to the interview will subsequently be asked to confirm its accuracy. In the case of formal oral evidence, a recording and full transcript will be made. All interviewees will be sent a formal transcript and will be provided 14 calendar days for review.
35. The Commissioner has the power under 'Part 3, paragraph 11 of the Third Schedule to The Reform (Sark) (Amendment) Law, 2025 to summons people to appear and to provide documents.
36. Part 3, paragraphs 12 to 16 of the Third Schedule to The Reform (Sark) (Amendment) Law, 2025 sets out the criminal offences and related penalties arising from any failure to assist the Commissioner in the discharge of her functions. In particular, it should be noted that any person who, without reasonable excuse, refuses to comply with a requirement of the Commissioner, or gives false or misleading information to the Commissioner or otherwise interferes with witnesses, or obstructs the Commissioner or destroys documents, is liable to prosecution.
37. Part 4 sets out the relevant personal and professional privilege protections which apply.

### **Assessing the evidence**

38. If the Commissioner’s investigation has uncovered material evidence that is at variance with the Member’s version of events, she will put this to the Member, who will have the chance to challenge it.



39. Before finalising her report, the Commissioner will share with the Member a draft of her findings of fact and provide the Member with an opportunity to comment. The Commissioner may also share with the complainant a draft of her findings of fact on a confidential basis, where the Commissioner considers it is appropriate in the circumstances to do so. All parties are provided 14 calendar days to make any challenges.
40. If, having considered the Member's comments, the Commissioner considers that there remain significant contested issues of fact, she will prepare her own account of the facts of the case, while drawing attention to those points which are contested.
41. The Commissioner reports their findings to the Greffier in the following form:
  - a. a summary of the initial complaint and of the relevant elements of the Code;
  - b. a brief account of the key facts in the case, with reference to evidence as appropriate, and with any contested points of fact highlighted;
  - c. their findings with reasons as to whether or not the Code has been breached and any relevant evidence, written and oral;
  - d. a recommendation as to what action, if any, should be taken.
42. The Commissioner shall report their findings to the Greffier for forwarding to the Policy & Finance Committee which will submit the report - with the Commissioner's recommendations - to the Presiding Officer for inclusion in the next Chief Pleas of Sark's meeting agenda for debate at its next statutory meeting, or if a statutory meeting is six or more weeks away will make a request for an extraordinary meeting to be called sooner. The Commissioner will inform the complainant of the action taken in response to the complaint.

### **Right to appeal the decision of the Commissioner**

43. An appeal against a decision by the Commissioner can be made either by the complainant or the respondent to the Greffier who will allocate the appeal to one of the available Appeals Commissioners ("AC").
44. The role of the AC is to review the decisions taken by the Commissioner. The AC does not re-investigate the allegations during an appeal, nor does he/she take fresh decisions on the basis of the investigation.
45. To submit an appeal, it must be:
  - a. made in writing
  - b. submitted by the complainant or respondent, not by an adviser or supporter
  - c. submitted within 20 working days of being notified of the Commissioner's decision<sup>2</sup>
  - d. set out which of the below grounds apply
46. An appeal can be brought under one or more of the following grounds:

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<sup>2</sup> *The deadline may be extended if there are mitigating circumstances. A request for an extension should be done as early as possible and before the appeal deadline. Any request should clearly state the mitigating circumstances and, where appropriate, provide evidence of such circumstances. Any request for an extension to the deadline must be made by the complainant or respondent, not by an adviser or supporter, and there is no guarantee the extension will be approved.*

- a. there was a material error in the relevant investigation by the Commissioner that affected the decision,
  - b. the decision was unreasonable,
  - c. the process followed by the Commissioner in reaching the decision was flawed,
  - d. credible new evidence has become available which, if accepted, would have a real prospect of affecting the decision,
  - e. in the case of a decision to impose a sanction, the sanction imposed was disproportionate, or
  - f. there is another compelling reason to allow an appeal to be made.
47. An appeal submission should include as much detail as necessary to consider the appeal and to understand the nature of the issues being raised.<sup>3</sup>
48. Where an appeal is wholly or partly on the grounds of credible fresh evidence, that evidence should be included in the appeal submission or by way of a summary.
49. The AC will:
- a. consider whether the issues raised in the appeal fall within one or more of the grounds for appeal and whether there is any substance to the grounds;
  - b. consider whether to disclose an appeal submission to the other party. This will normally only be if the AC wishes to request further information from them or to ask them to respond to a specific point;
  - c. consider the substantive appeal and reach a conclusion on the merits. The AC may request additional evidence but will not conduct a re-hearing of the case.
50. The AC will normally decide the appeal based on written submissions. Exceptionally, the AC may decide that it should hold an oral hearing with one or both of the parties (separately), but only if there is a specific reason for doing so.
51. The AC will apply the civil standard of proof, the balance of probabilities, as applied by the Commissioner.
52. The AC will make a decision on the appeal and say whether or not the complaint has been upheld. Depending on the outcome, the AC may then need to go on to consider the question of sanction. The AC can uphold, reduce or increase the sanction. In cases where the complaint has not been upheld, no sanction will be imposed.
53. The AC will report their findings to the Greffier. The Greffier will notify the complainant and the Member and at the same time will send the report to Policy & Finance Committee for them to forward to the Chief Pleas of Sark. The AC's report will be handled in the same manner as a report from the Commissioner.
54. The AC may, exceptionally, require or recommend that the complaint is re-

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<sup>3</sup> The AC may or may not ask for more information. Insufficient supporting information in an appeal submission may reduce the likelihood that the AC will decide that there is any substance to the grounds raised.

investigated taking into account its decision.

55. The decision of the AC is final and cannot be appealed.

*28th August 2025*

*Dr Melissa McCullough  
Commissioner for Standards*