



**MEDIA CONTACTS:**

Eden Hurlston | Morgan Ebanks

E: [amplifycayman@gmail.com](mailto:amplifycayman@gmail.com)

W: [www.amplifycayman.com](http://www.amplifycayman.com)

**FOR IMMEDIATE RELEASE**

February 4th, 2022

**OPEN LETTER**

**Amplify Cayman expresses grave concern about the 'salami slicing'  
decision for the Little Cayman Boutique Resort**



In light of the [recent DCB decision](#) to approve terrestrial development of this project, Amplify Cayman would like to briefly re-address why we feel this flies in the face of environmental, social and economic responsibility, and directly conflicts with sustainable development.

With the economic viability of the project relying on overwater bungalows that are to be constructed in a [Marine Preservation Zone](#), we have great difficulty understanding why this segment of the application would even be heard.

As a key first step in Climate Action, there is significant international and regional focus to **preserve nature**, and to **strengthen protections** around current conservation efforts. Considering such a project in 2022 in such a zone seems completely out of touch with the reality of climate change when, according to [Conservation.Org](#):

*"Reversing nature loss could account for **roughly 30 percent**  
of global action needed to stabilize our climate."*

We should be replenishing, expanding and safeguarding protected natural areas for future generations. We should be creating [BlueGreen livelihoods](#) based on stewarding, studying and sustainably managing our natural resource usage, as proposed by DOE and NCC in [Seizing the Moment to Transition to a Greener Economy](#). Instead, it seems we are skirting policy and breaking the spirit of the 2001 UKOT Environment Charter, and our very own Constitution, to build yet another out-of-scale, out-of-character, profit-driven project. Instead of benefiting future generations, we aim to benefit a few investors.

**Find us on Social Media:**



@amplifycayman

The first 4 (of 10) guiding principles of the [2001 Environmental Charter](#) are as follows:

1. To recognise that all people need a healthy environment for their well-being and livelihoods and that all can help to conserve and sustain it.
2. To use our natural resources wisely, being fair to present and future generations.
3. To identify environmental opportunities, costs and risks in all policies and strategies
4. To seek expert advice and consult openly with interested parties on decisions affecting the environment.

Speaking to all of these guiding principles, and following principal #4,

*CNS article: "expert advice" from the Department of Environment called technical submissions for the coastal works application "fundamentally unacceptable" and, regarding the recent decision, stated that they do "... not consider that these new plans indicate a commitment from the applicant to pursue a development of a land-based hotel resort only. The full project still includes overwater bungalows and approving this development is planning on a piece-meal basis. Trying to 'slice up' and separate parts of the project to avoid a comprehensive review of the likely impacts of the project as a whole is contrary to best practice."*

Not only has public input been restricted as "**interested parties**" on the land based aspect of the project, but the DoE's "**expert advice**" on the matter is blatantly being disregarded. [Amplify Cayman](#) feels that it is decisions like this that make this Charter, which we committed to 20+ years ago, meaningless and shred the spirit of any such agreements aiming to benefit future generations.

Our [Constitutional Bill of Rights](#) states, in Section 18:

*Protection of the environment 18.—*

- (1) *Government shall, in all its decisions, have due regard to the need to foster and protect an environment that is not harmful to the health or well-being of present and future generations, while **promoting justifiable economic and social development**.*
- (2) *To this end government should adopt reasonable legislative and other measures to protect the heritage and wildlife and the land and sea biodiversity of the Cayman Islands that —*
  - (a) limit pollution and ecological degradation;*
  - (b) promote conservation and biodiversity; and*
  - (c) secure ecologically sustainable development and use of natural resources.*

It seems that this decision obviously conflicts with the highest law in the land and, again, shreds the spirit of our Constitutional order, under which all citizens and agencies, public and private, must operate. Although this decision seems to go against every aspect of environmental protection and good governance, we will focus on the emboldened words, and point to just 1 of the 9 reasons from [our previous statement](#) on this project, as to why this decision does not promote "**justifiable economic and social development**", specifically reason #7:

#### 7) Economy

*Creating a circular economy is an economic system that tackles global challenges like climate change, biodiversity loss, waste and pollution. We do appreciate the efforts in the proposal to address waste and pollution but creating a commercial venture in an undeveloped location where*

**Find us on Social Media:**



@amplifycayman

*all supplies and people are required to travel by barge or air transport is an overall contradiction of the term. Countries like Jamaica have a strong agricultural and manufacturing economy, ours is not.*

*An eco-lodge, such as that in Cayman Brac, maybe something more suitable and progressive for Little Cayman where there is an investment to grow fruits and vegetables thus eliminating the need to package and import produce. Offsets for the overall consumption of imported products for the resort, as well as the employees, is not addressed in the proposal. Furthermore, the proposal references employment of the local population. This is misguided as all staff for this resort would need to be imported and historically those willing to relocate to work in Little Cayman are permit holders which includes tour guides.*

## Call to Action

1. People of Cayman, please heed [Little Cayman's District Committee](#) of the Cayman Islands National Trust's call to action, [shared via their social media](#) (below). **Immediately contact your MP and demand that they protect our cherished natural resources.** Use this document if you wish.

*"Here is an update on the Kingston Bight development. The Development and Control Board for the Sister Islands has approved the Planning application which encompasses the land-side portion of the development. The proposed overwater portion is covered under a separate Coastal Works Permit application, which is reviewed and ruled on by Cabinet. Cabinet has not, as far as we know, heard the application, approved, or denied it. If you do not wish for Cabinet to give away, or sell part of a National Marine Park that belongs to all of the people of the Cayman Islands, for the enrichment of a private developer, make your feelings known to your MP, Minister, or Member of Cabinet."*

2. Elected Leaders and Heads of Public Agencies, this issue points to the obvious need for Cayman to redouble conservation efforts and build far more robust, and truly sustainable policy and practice regarding how we design, how we develop and how we decide to shape our future. **We call for review and update of planning policies surrounding this issue, to align with our Constitution and internationally recognized best practice for Sustainable Development.**
3. Honourable Ministers of Parliament, if not already decided, **we call on our representatives to bring this matter of an over-water Marine Reserve development, as a petition of the People, under Section 90 of our Constitutional Order 2009, to Parliament for debate and to assent legislation in accordance with the outpouring of concern laid down by citizens and NPOs.**

The dismissal of expert advice and public concern, the obvious disregard for negative environmental and socio-economic impacts, and the apparent direct conflict with the 2001 Environment Charter, our Constitutional Bill of Rights, the [UN's Sustainable Development Goals](#) and internationally recognized [best practice for Climate Action](#), make this project and the DPB decision unjustifiable.

The Amplify Cayman People's Sustainability Charter, which was published September 27th 2021, on the 20th anniversary of the 2001 Environmental Charter, can be found [here as a PDF](#) and [here to review and sign online](#).

-End-

### About Amplify Cayman

Amplify Cayman is a non-partisan full community-invested group of diverse and civic-minded Cayman residents, who wish to participate in the decision-making processes that impact our communities. Amplify Cayman focuses on working together with all stakeholders to achieve the best possible outcome for the nation, through three functions: thought leadership, education and advocacy. For more information, visit [amplifycayman.com](http://amplifycayman.com).

### Find us on Social Media:



@amplifycayman

## Copy of the email sent on August 6<sup>th</sup>, 2021.



Director of Planning, Haroon Pandohie  
Director of Environment, Gina Petrie-Ebanks

Dear Directors of Planning and Environment,

The comments provided below are in relation to the planning consideration for a new tourism resort build in Little Cayman. The deadline to provide comments is Friday, 6 August.

We are encouraged by the proposal from NCB to address matters of sustainable development, work conditions and a business model. We provide the following comments for general consideration in an effort to contribute to the goal of guiding sustainable development in the Cayman Islands.

### 1) Do We Need It?

According to the NCC, a hotel needs assessment is recommended for all three islands.

- The National Planning Framework (NPF) is still in draft- guidance practices in approving a project based on a commercial decision is not advisable without credible data to support it.
- The 'boutique resort' is launched as a beacon of sustainable tourism for the Cayman Islands. However the National Tourism Plan (NTP) talks more specifically about considering a multitude of activities to *support local business and the economy, industry training and customer service development, advancing heritage, culture and values* as well as *promoting the protection of our local environment* for the benefit of *future generations of Caymanians*.
- Industry Partners, Caymanians and Residents of Little Cayman provided input into the NTP and their opinions in this matter should be carefully considered.

### 2) Capacity

The National Tourism Plan was adopted in 2020 and sets out some important criteria.

- **Little Cayman is unique and very little is currently protected** - it is well understood that the majority of Caymanians would like Little Cayman protected as a National Park and not to be over developed like Grand Cayman.
- Doubling the population and tourist offerings overnight in Little Cayman (est. 150 persons), is not sustainable growth.
- The proposal will take the Island well beyond its infrastructure limits which maybe to the detriment of the natural assets being preserved.
- Land for a solar farm and staff accommodations may impact the overall uniqueness and tranquility which is highly sought after.
- With the onlining of numerous hotels in Grand Cayman and the screening of both the Indigo and Trio Hotel by the NCC calling for a proper assessment of benefits we recommend that any decision for this project should be held in abeyance until appropriate data and screening have been completed.  
<https://www.caymaniantimes.ky/news/does-cayman-need-more-new-hotels-and-hospitals>

Find us on Social Media:



@amplifycayman

### 3) Natural Assets

Biosecurity efforts are in the *embryonic stage* with targets being nowhere near where they should be in regards to improving destination management to protect beaches from coastal erosion, road kill, marine resources, solid waste management, feral cats and mosquito control, to promote sustainable growth of tourism and of the local population in Little Cayman.

- It was determined for the NTP, that *preserving the unique character of the island*, is a primary driver of visitor demand.
- Little Cayman is a **mission blue hope spot**. A good litmus for any development is how does it facilitate/ enhance that status.
- The resident environmental organisations that manage the local natural assets ie the Little Cayman District Committee of the National Trust and the Central Caribbean Marine Institute as well as The Dept of Environment should be engaged and asked to provide expert opinions on the proposed development. Their vision, support, investment and funding provide an invaluable international spotlight for our natural and eco-tourism product offerings in the Sister Islands. These important sites are also spotlighted through Defra UK, Darwin and RSPB UK.
- With couple room rentals likely in the \$2000 a night category this luxury resort offering may not be best placed in an *eco-destination*.

### 4) Ecological Concerns

In the short time available our most noticeable concerns are:

- Artificial Grass

We are not proponents of artificial grass, even in small areas. The production and off-gassing of fake plastic grass is that it is not considered environmentally friendly, it doesn't "root" or add to the land. In the tropics, the plastic heats up to dangerous levels where it is not recommended for babies or pets as it will burn their feet and our high heat temperatures also shorten the life and quality of the product. Even if a high quality product is proposed, artificial turf replaces habitat for our threatened land crabs, Sister Island rock iguana's (SIRIs) and hermit crabs that are an integral part of the natural landscape at Kingston Bight (see below images 1, 2 & 3). A traditional sand garden with dune grass (seeds are food for water birds) is more suited and a SIRI expert should be consulted before any construction commences. This was not done for the Dagarro project in Cayman Brac which devastated home habitat for the SIRI's.

- Asphalt Driveway

Kingston Bight is serviced by an unpaved road and the approach driveway in the drawings appears to be asphalt which is a non-porous material and difficult to upkeep on Little Cayman. The character of the landscape in Little Cayman is served by sand and gravel drives which provide natural drainage and do not impact nature. Is the intention to pave all roads for e-bikes or to minimize impact? Addressing stormwater management within the site if it is to be filled is a critical issue for runoff.

Find us on Social Media:



@amplifycayman

- Coastal Works

The consideration of environmental issues as they affect both land and marine habitat are significantly underestimated. Proposed coastal works sit within a marine replenishment zone which feed and nurture a variety of wildlife. Many of the birds that live in the **RAMSAR bird sanctuary** (frigates, boobies and herons) feed in this area and can be observed flying back and forth throughout the day. The seagrass meadows provide critical habitat for their food source as well as the bone fish and conch that live in the reserve. The irreversible loss and effects on the quality of seagrass in the wider reserve cannot be mitigated successfully and will likely impact the RAMSAR site. Human activity in the water swimming, jumping, diving will also have an impact.

## 5) Cayman Heritage & Culture

The applicant has partnered with an organisation called Hoteladvice. A cursory review of their website and staff indicates that their culture and signature stamp is not in line with embracing Caymanian heritage and culture. A luxury boutique resort is an example of the customer driving the product offering, something which has driven over tourism and unsustainable development to date.

- Over-the-water bungalows have been introduced to the Caribbean in recent years. They do not contribute to enhancing local heritage and culture or local visitor experience in a cultural way.
- The renderings we have viewed we would not consider as being true Caribbean architecture, character or traditional in style.
- Sand gardens and driveways are replaced by artificial grass or asphalt.

*Example of local build knowledge-* stilted home set well back from the south hole sound, storm protection provided by mangrove buffer and drought tolerant plants and natural grass to soak up and drain away stormwater and high tides.

## 6) Policies

Consideration and alignment with The National Tourism Plan and the new Marine Parks Regulations are noticeably absent from the proposal. As there are no laws or regulations governing over-the-water commercial ventures in the Cayman Islands the applicant has taken guidelines from Jamaica. It took Sandals Resorts in Jamaica 50 years of lobbying to pass such a project as inherently the concept is not traditionally Caribbean. Since that time, the market for bungalows has exploded and these are now dotted throughout the Caribbean. Such an offering will only remain boutique until the next proposal is granted.

## 7) Economy

Creating a circular economy is an economic system that tackles global challenges like climate change, biodiversity loss, waste and pollution. We do appreciate the efforts in the proposal to address waste and pollution but creating a commercial venture in an undeveloped location where all supplies and people are required to travel by barge or air transport is an overall contradiction of the term. Countries like Jamaica have a strong agricultural and manufacturing economy, ours is not.

**Find us on Social Media:**



@amplifycayman

An eco-lodge, such as that in Cayman Brac, maybe something more suitable and progressive for Little Cayman where there is an investment to grow fruits and vegetables thus eliminating the need to package and import produce. Offsets for the overall consumption of imported products for the resort, as well as the employees, is not addressed in the proposal. Furthermore, the proposal references employment of the local population. This is misguided as all staff for this resort would need to be imported and historically those willing to relocate to work in Little Cayman are permit holders which includes tour guides.

## 8) Hurricane Damage Liability

Prepared insulated SIP panels constructed from cement board and compressed polystyrene, with hardie board siding and shingle roofing are not Cat-4/5 hurricane rated construction methods for this region. Catastrophic hurricane events occur in the Caribbean and the majority of built homes are downwind of Kingston Bight and historical storm patterns. Associated property damage to neighbouring property and natural assets from bungalow debris in a storm event is a high probability and can only be remedied with financial bonds considering the proposed construction methods.

## 8) Constraints

It is worth mentioning that the constraints highlighted in undertaking the assessments were set out as being *inadequate historical baseline data, lack of survey data, lack of socio-economic data, restricted access to site, no local knowledge and expertise, lack of resources on Little Cayman for equipment, Covid 19 effects, no inventory of accommodation, logistics and survey equipment, current inhabitancy*. These constraints accurately set out most of the concerns with approving this proposal without the necessary data in hand.

We hope you find these comments helpful and that they will be incorporated into the screening process for the Central Planning Authority.

Please feel free to contact us if you should have any queries or find that we have misrepresented any information.

Kind regards,  
AMPLIFY CAYMAN



Find us on Social Media:



@amplifycayman