

Norfolk Recreational disturbance Avoidance Mitigation Strategy Action Plan 2024 FAQ

What is the Recreational Disturbance Avoidance Mitigation Strategy (RAMS)?

- RAMS is a collaborative project between Broadland District Council, Breckland District Council, Great Yarmouth Borough Council, The Borough Council of King's Lynn & West Norfolk, North Norfolk District Council, Norwich City Council, South Norfolk Council and the Broads Authority to help prevent additional recreational pressure on European designated sites on the Norfolk Coast, in part due to residential development in the area.
- The Strategy was completed by an external consultant and forms a part of the evidence base of Local Plans under preparation and due to be examined across the authorities.
- The Strategy therefore forms the base document for the implementation of RAMS contributions in the Norfolk Council areas.
- RAMS contributions have been calculated based on a study of the potential impact of increased recreational use on Habitats Sites within Norfolk, which are protected for their International habitat and species value.
- The Norfolk GIRAMS provides a strategic and streamlined approach to mitigation measures, enabling development within the Zone of Influence.

What is the Action Plan 2024?

This document updated the original GIRAMS published in March 2021. It builds on the approach established in 2021 in the in the Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy ('GIRAMS') and sets out detailed actions relating to mitigation measures.

The ideas for mitigation projects cover a range of interventions including infrastructure, engagement, redistributing access, monitoring (targeted at supporting the mitigation delivery) and support/collaboration across organisations. A delivery manager will coordinate the mitigation and work with partners to allow them to draw on the funds and further develop projects as appropriate. The project ideas provide the outline for the mitigation – some are close to fully worked up proposals and could be implemented quickly while others are likely to require refining and review with time. The role of the delivery manager will ensure mitigation is linked to where housing growth takes place and phased to match the housing growth coming forward. Oversight and the necessary governance ensures diligence and flexibility. This provides the necessary mechanism for local planning authorities to ensure compliance with the Habitats Regulations.

How much will it cost?

The tariff for the standard GIRAMS Payment is:

- £304.17 per house (index linked)
- For tourist accommodation the contribution will be calculated on a case by case basis by the Council, depending on the type, location and seasonality of the accommodation.
- A fee of £50 per submitted Unilateral Undertaking will be charged to cover legal and administration costs.

- There is no administration fee for a payment in advance unless your planning application is refused and the payment refunded in which case the sum of £25 will be retained to cover expenses.
- Fees will only be refunded after the appeal period has lapsed or the appeal is dismissed and the period for any subsequent High Court challenge has lapsed.
- The standard GIRAMS Payment is in addition to the standard Public Open Space provision required for development and any specific on-site monitoring and/or mitigation measures or off-site provision of alternative natural greenspace

Why am I paying a contribution to RAMS?

- RAMS payments are requested for development of one or more new dwellings and some tourism development, within any Zone of Influence (ZOI) from designated sites (known as Habitats Sites) within Norfolk
- The contribution to RAMS is a simple way of allowing the Appropriate Assessment of smaller developments to conclude that the in-combination effect will be mitigated. This is undertaken with the template 'KLWNBC GIRAMS template shadow HRA'.
- Alternatively, the applicant can go through the submission of a shadow Habitats Regulation Assessment, identifying their own mitigation package, which could then be secured through a Section 106 or planning condition as appropriate.
- Where the development falls within any ZOI, the option to pay RAMS reduces (or eliminates) the need for onsite mitigation in relation to Habitats Site impacts.
- The potential impact of a development site will be considered in combination with other developments occurring in the area.

What are Habitats Sites?

- Habitats Sites are designated for their special features, either species or habitats. Synonyms include European sites and Natura 2000 sites.
- In Norfolk many sites are special for gatherings of migrating wading birds, wetlands and rare wildlife and vegetation.
- These sites are recognised internationally as important for the habitats and species they support and have management requirements.
- They comprise Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites (important wetlands).
- The Conservation of Habitats and Species Regulations 2017 (as amended) implements the EC Habitats Directive and elements of the EC Birds Directive.
- The aim of the Habitats Directive is to conserve natural habitats and wild species across Europe by establishing a network of Habitats Sites (these are referred to as European sites / Natura 2000 sites).
- The aim of the Birds Directive is to manage wild bird populations across Europe through SPA establishment, with a focus on important wetlands (also part of the Natura 2000 network).
- The Ramsar Convention is also an important consideration, and although an international designation rather than European, Ramsar sites (internationally important wetlands) are included in the Habitats Sites definition.

What is a Zone of Influence (ZOI)?

- The Norfolk GIRAMS identifies particular Zones of Influence (ZOIs) which represent the extent of land around Habitats Sites within which residents travel to the relevant site for recreational activities, as evidenced by extensive visitor survey work.
- Studies have determined the distance to each Habitats Site within which residential development will potentially increase visits and use of those sites, increasing the recreational disturbance pressure on that site.

What are the relevant Zone of Influence /Habitats Sites?

- The following ZOIs cover the administrative area of the Council, and contain the following designated Habitats Sites:
 - Brecklands ZOI (Breckland SPA, Breckland SAC)
 - North Coast ZOI (North Norfolk Coast SAC, North Norfolk Coast SPA, North Norfolk Coast Ramsar)
 - Roydon Dersingham ZOI (Roydon Common Ramsar, Dersingham Bog Ramsar, Roydon Common and Dersingham Bog SAC)
 - Valley Fens ZOI (Norfolk Valley Fens SAC)
 - Wash ZOI (The Wash SPA, The Wash and North Norfolk Coast SAC, The Wash Ramsar)

Which types of development does this apply to?

- The RAMS charge applies to all new residential and tourist development within the Zone of Influence including
 - C1 - Hotel including boarding houses and guest houses
 - C2/C2A - Residential Institutions e.g. care to people in need of care including nursing homes, hospitals and secure institutions and school, college or training centre
 - C3 – Dwelling Houses, any net increase (excludes replacement dwellings and extensions)
 - C4 - Houses in Multiple Occupancy
 - University managed student accommodation
 - Residential caravan sites/mobile homes/park homes/moorings
 - Gypsies, traveller and travelling show people plots (temporary or permanent)
 - Holiday Dwellings e.g. holiday caravans, touring pitches and campsites

Café, food outlet and visitor attraction will be considered case-by-case based on application, location and links to the coast.

- Major residential development sites, non-residential development, employment growth or infrastructure improvements will still need to provide a Habitats Regulations Assessment as there will be impacts outside the scope of the GIRAMS Action Plan, which only deal with incombination Recreation impact (i.e. not alone impacts).

What is the purpose?

- Studies have shown that when people use sensitive sites, or sites at sensitive times of the year, species and habitats can be impacted.
- GIRAMS aims to ensure no adverse impacts to Habitats Sites by impending coordinated mitigation measures

What is Recreational Pressure?

- Recreation is considered as activities that are undertaken by people during time not classified as work.
- Recreational activities would include (but not be limited to); hiking, dog walking, cycling, and water sports.
- Recreational pressure would include (but not be limited to);
 - the use of sites for recreational activities which are not compatible with the designation of the site, or
 - the use of Habitats Sites by a greater number of people (either as groups, or spaced over time), than the site has previously supported (i.e. large numbers of new residents to an area near a Habitats Site).

What are we protecting?

- Rare and vulnerable birds including species such as Little which feed, nest and/or rest during migration on the Norfolk Coast.
- Habitats that provide food, rest (rooting) and nesting locations for rare and vulnerable species.
- Habitats which are themselves rare or vulnerable in the UK, across Europe or internationally.
- Rare and vulnerable plants.
- Rare and vulnerable animals

What sort of impacts are we concerned with?

- Birds may take off more than usual, or be scared away from their feeding or roosting areas.
- Wildlife (or grazing animals used for site management) may be chased, or disturbed by off lead dogs, or the presence of too many people.
- Large gatherings (flocks) of wading birds in winter (end of August to March) can be disturbed, and this can result in them not being able to store enough energy for their long migrations.
- Footpaths can become eroded and rerouted by people walking on sites.
- Vegetation can become trampled and eroded, and invasive, non-native plant species can be introduced to disturbed ground.
- Nesting birds can be disturbed from their nests and the nests and eggs trampled, as they are well camouflaged.

What is the process?

- During the screening of a planning application within the Zone of Influence, if it is decided that any likely significant effects (LSE) would occur to the Habitats Site due to the development, an appropriate assessment (AA) is required.
- The appropriate assessment may be in a template form (less than 50 dwellings), where a RAMS contribution is made.
- For larger developments (50 or more dwellings) on site recreational space / greenspace, Rights of Way improvements and connections may be required, and in some cases Suitable Alternative Natural Green Space (SANGS) would need to be provided in addition to RAMS contributions.
- In addition, developments within close proximity of designated sites (<400m away) will require HRA to assess other potential impacts (e.g. noise, lighting).

- Once development proceeds, the contributions will go towards projects at the Habitats Sites which will be prioritised to avoid, reduce or divert recreational pressure on these sensitive areas.

When you need to submit this information?

- Depending on the details of your application, you may have to make a HRA RAMS payment when you are making an application within a ZOI for:
 - outline permission with all reserved matters
 - outline permission with some reserved matters
 - reserved matters where the HRA was not addressed at the outline stage
 - residential conversions
 - residential new build
 - prior approvals
 - variation of conditions
 - permitted development
- If your application is for one of these types of planning permission, you need to make a HRA RAMS payment if your proposal is within a ZOI and for:
 - a residential development for a net gain of one or more new dwellings

Where will my money be spent?

- Your money will be put into the RAMS fund, a project which will pay for staffing, education and work at sensitive sites, to help, minimise the increased impact, or develop new access routes.
- The fund works as a pool of money which will be focused on the most sensitive areas first, then moving onto less impacted sites.
- The Strategy includes a list of measures and projects to be funded through the tariff, these include:
 - Employment of specific RAMS wardens based at sites to provide education and information to visitors, to increase awareness and understanding of the important features of the sites and develop an interest in reducing the impact on the species by actions such as staying on footpaths, and keeping dogs on the lead.
 - An audit of signage that is currently at these sites, to consider reducing the number and variety of signs at site entrances, and to develop a consistent approach to footpath marking across landowners and stakeholders.
 - Dog related measures including liaising specifically with dog walkers, increasing awareness of impacts of off-lead dogs (particularly on birds), to develop proposals for dog friendly areas and to consider alternate locations for dog activities, away from nesting, roosting and feeding bird areas.
 - Interpretive signage that will provide information and interest related to why the areas are designated, important species found there and how visitors can help them.
 - Car parking audit to determine high and low use areas, and if changes need to be made in charging or amount of parking available at the European Sites.
 - Monitoring work to find out if implemented measures are working, such as surveys to determine if vegetation is recovering if there is less off-path walking, bird surveys to see if birds are being disturbed less, and visitor surveys.
 - Other site specific measures such as fencing, to keep people and dogs separated from nesting Little Terns, or planting to screen paths from sensitive bird areas.

- Development of codes of conduct for user groups, where appropriate.

What If I don't want to pay into RAMS?

- Although paying into RAMS is the easiest way to help mitigate against recreational disturbance impacts to designated sites arising from new residential development, there is an option not to pay into the RAMS fund.
- Providing onsite mitigation is expensive and will be assessed to ensure it provides meaningful recreation. It must provide a suitable alternative to visiting a Habitat Site.
- It should be noted that if you do not wish to pay RAMS, any recreational opportunities in your development will be subject to a Habitats Regulations Assessment.
- Most independently undertaken bespoke mitigation schemes will cost more than the RAMS contribution to provide and manage in perpetuity.
- Because RAMS is a comprehensive form of mitigation to address cumulative effects, the alternative of addressing those effects on a piecemeal basis for individual sites is unlikely to be effective

Why am I contributing to RAMS projects outside the District I'm developing in?

- During the RAMS study, particular ZOI's were determined for each individual Habitats Site, and people from outside the Kings Lynn and West Norfolk Borough Council area were identified as recreating at the Habitats Sites.
- The Norfolk worked to provide a collaborative approach to strategic mitigation.
- Everyone within the ZOI who is developing land and adding to residential dwelling numbers are being asked for RAMS contributions.
- It is also worth noting that RAMS style projects are being put in place along the Essex and Suffolk Coasts, recognising that some Habitats Sites straddle County boundaries and much of the coastline of East Anglia has both Habitats Sites and recreational pressures.
- Norfolk RAMS contributions will only be used within Norfolk.

I am already paying Community Infrastructure Levy (CIL) – Why am I paying RAMS?

- RAMS is an additional contribution, focused on delivering mitigation to Habitats Sites.
- RAMS is specific to providing environmental mitigation, conservation and interpretation at designated sites and it is largely not an infrastructure project in itself, so cannot make use of CIL.
- The aim of RAMS is to reduce the projected impact of increased recreation on the designated areas from new residents within the ZOI and RAMS funding rather than CIL funding for this purpose ensures that RAMS is spent where required

Other points

- RAMS is replacing the Habitats Mitigation Fee.
- RAMS does not cover off other environmental requirements / obligations.
- Green Infrastructure (GI) and Biodiversity Net Gain actions may still be required on your development.
- There are different requirements depending on the size of your development, less than 50 dwellings vs 50 or more dwellings. For sites of 50 or more dwellings it is recommended that you engage with the planning team at an early stage of pre-application enquiry to consider what form of mitigation should be accommodated on the site.

- RAMS is collected for net gain in dwelling numbers. An existing dwelling with an extension or annex, provided that extension or annex are not providing a new dwelling, does not apply.
- A single dwelling being split into two or more units would pay RAMS for the additional 'new' units/dwellings.
- A conversion from non-residential use, to residential use would be subject to RAMS.
- RAMS is being collected for tourist accommodation
- Zone of Influence map here available on the council website here [Habitat mitigation \(RAMS\) | Habitat mitigation \(RAMS\) | Borough Council of King's Lynn & West Norfolk \(west-norfolk.gov.uk\)](#)