

Suffolk Coast Recreational disturbance and Avoidance Mitigation Strategy (RAMS)

Questions and Answers – November 2019

Q. What is RAMS?

A. RAMS stands for Recreational disturbance Avoidance and Mitigation Strategy (The Strategy). RAMS is a means by which sustainable housing growth can be delivered in Ipswich Borough, Babergh District, Mid Suffolk District and East Suffolk Councils, facilitating development whilst at the same time adequately protecting Habitats/European wildlife sites (European Sites) from harm that could otherwise potentially occur because of increased recreation pressure arising from the new housing growth.

The RAMS identifies the mitigation necessary to allow the Local Plans to be compliant with the Habitats Regulations and the financial contribution will go towards the implementation of the RAMS strategic approach.

Q. What does this mean?

A. The Strategy provides a way for relevant developments to provide habitats site mitigation in the form of a financial contribution. The monies collected via the RAMS tariff will then be allocated to projects (as set out in the strategy) within the European Sites to reduce the impact of the increased recreational pressure.

It is an option for developers to secure suitable mitigation measures at the European Sites to reduce the adverse impact of people visiting these internationally important sites.

If the developer commits to paying the proportionate financial contribution set out in that Strategy in order to avoid & mitigate the effects of their development, then it is possible to conclude that an adverse effect on the European Sites as a result of the development can be avoided. This enables development to go ahead in compliance with the Habitats Regulations and enables developers to deal with the issue quickly and simply.

Q. Why is this required?

A. The Conservation of Habitats and Species Regulations 2017 (known as the 'Habitats Regulations') set out how Local Planning Authorities must deal with planning applications that are likely to have an adverse effect on European Sites. Natural England advice is that, to comply with The Regulations, Local Planning Authorities (the competent authorities) must not to grant consent for residential development within the Zone of Influence (ZOI) that would, either alone or in combination with other plans and projects, have a likely significant effect on a European Sites. If this cannot be ruled out effective mitigation needs to be identified and secured to avoid adverse effects on site integrity of any European Sites.

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Monitoring of the effectiveness of these measures will be key over the lifetime of the Local Plans and delivery of measures to avoid adverse impacts from residential development.

Q. What area is covered by the ZOI for the RAMS tariff to apply?

A. Evidence demonstrates that residents travel from within a 13km zone around the European Sites. Therefore, new residential development that falls within the 13km ZOI is predicted to result in increasing recreation at the coastal Habitats/European Sites.

The extent of the area can be viewed on Natural England online mapping system Magic <https://magic.defra.gov.uk/>

A map showing the area where the RAMS charge applies can be viewed via this link: <http://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=ec07051688d9460e918d3cc69829f9be>

This area commonly referred to as ZOI comprises of two separate areas (Zone A and Zone B).

Q. Which types of development does this apply to?

A. The RAMS charge applies to all new residential development within the Zone of Influence including -

- New dwellings of 1+ units (excludes replacement dwellings and extensions)
- Houses in Multiple Occupancy (HMOs)
- Student Accommodation
- Residential care homes and residential institutions (excludes nursing homes)
- Residential caravan sites (excludes holiday caravans and campsites)
- Gypsies, travellers and travelling show people plots.

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 Strategy

Q. What are the relevant European Sites?

A.
Alde-Ore Estuary Special Protection Area (SPA)/ Ramsar (wetland),
Benacre to Easton Bavents SPA,
Deben Estuary SPA/ Ramsar,
Minsmere-Walberswick SPA/Special Area of Conservation (SAC) and Ramsar – only the accessible fringes of the designated sites
Orfordness – Shingle Street SAC,
The Sandlings SPA and

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The Stour & Orwell Estuaries SPA/Ramsar.

Q. Why are they internationally important for wildlife?

A. Several of the European Sites on the Suffolk coast are estuaries which have large areas of mudflats at low tide. These areas provide excellent feeding and roosting opportunities for migratory wading birds to refuel and rest, in addition to valuable habitat for other species. Other sites are important for their unique vegetation, or unusual wildlife. All the sites are recognised internationally as special places which support wildlife and habitats that may not be able to survive in other locations.

The SPAs have been designated because they support 1% or more of the Great British population of wading bird species such as the Avocet and Black Tailed Godwit. The areas have been designated to provide increased protection and management due to the importance of the area for breeding, wintering and migration of rare and vulnerable species of bird. The SACs are designated for rare and sensitive habitats and internationally important populations of rare species eg. mudflats, coastal lagoons and Ramsar sites (important wetlands) are designated to protect wetland habitats and rare species eg. saltmarshes, Dark- Bellied Brent Goose and Redshank.

Q. Why are contributions required toward mitigation when building new houses?

A. Additional residents moving into the new homes will mean an increase in recreational activity along the Suffolk Coast. The 'in-combination' impact of proposals involving a net increase of one or more dwellings within a 13km ZOI of the European Sites are considered to have an adverse effect on site integrity unless avoidance and mitigation measures are in place. With an increase of residents comes increased pressure on the European Sites in the form of trampling of delicate vegetation and disturbance to the wintering wading birds, particularly though dog walking.

Q. Do I have to pay the developer contribution?

A. Under the Habitats Regulations, a development which is likely to have a significant effect on a European Sites must provide mitigation or otherwise must satisfy the tests of demonstrating 'no alternatives' and 'reasons of overriding public interest'.

Residential development within the RAMS Zone of Influence must demonstrate that the impact of that development on protected sites can be mitigated. Payment of the RAMS tariff is one option for providing that mitigation.

The alternative would be for the developer to gather their own evidence for a project level Habitats Regulations Assessment (HRA) and then to secure the necessary bespoke mitigation measures for delivery in perpetuity. This assessment would likely

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have a much higher cost than if the developer were to make a contribution to the implementation of the RAMS.

Q. Are other Authorities doing similar strategies?

A. Yes. There are over 20 other Local Authorities collecting mitigation money for different European Sites around the country.