

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

- RAMS is a collaborative project between East Suffolk Council, Ipswich Borough Council and Babergh Mid Suffolk Councils to help prevent additional recreational pressure on European designated sites on the Suffolk Coast, in part due to residential development in the area.
- The need for a RAMS project was first identified in the Appropriate Assessment carried out for the Suffolk Coastal Core Strategy (2013) and it has since been recognised as a strategy for mitigation in other Development Plan Documents in the area.
- The Strategy was recently 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 East Suffolk, Ipswich Borough and Babergh Mid Suffolk Council areas.
- RAMS contributions have been calculated based on a study of the potential impact of increased recreational use on Suffolk Coast European Sites, which are protected for their International habitat and species value.
- The Suffolk Coast RAMS provides a strategic and streamlined approach to mitigation measures, enabling development within the Zone of Influence.

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 a 13km zone of influence from designated sites (known as European Sites), on the Suffolk Coast.
- 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 included template 'Suffolk Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS) Habitat Regulation Assessment (HRA) Record' and flow chart leading to a Natural England pre-agreed Appropriate Assessment where relevant.
- 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 the 13km Zone of Influence (ZOI), the option to pay RAMS reduces (or eliminates) the need for onsite mitigation in relation to European Site impacts.
- The potential impact of a development site will be considered in combination with other developments occurring in the area.

What are European Sites?

- European sites are designated for their special features, either species or habitats.
- In Suffolk 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) 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 sites known as Natura 2000 sites (these are referred to as European 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 European Sites definition.

What is a Zone of Influence (ZOI)?

- The ZOI is an area within which it has been determined that people will travel to use a designated site for recreational activity such as dog-walking, hiking, cycling, and water sports.
- A recent study focusing on the Suffolk Coast European sites, determined that people regularly travel from 13 km away to visit European designated sites.
- Studies have determined that residential development within 13km of a protected site will potentially increase visits and use of those sites, increasing the recreational disturbance pressure on that site.

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.

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 European 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 European site).

What are we protecting?

- Rare and vulnerable birds including species such as Avocet (known from the RSPB logo) and Little Terns (may have seen fencing on beaches) which feed, nest and/or rest during migration on the Suffolk 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 European 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 maybe 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 200m of designated sites will require HRA to assess other potential impacts (e.g. noise, lighting).
- Once development proceeds, the contributions will go towards projects at the European Sites which will be prioritised to avoid, reduce or divert recreational pressure on these sensitive areas.

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 European 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, the 13km ZOI was determined, and people from outside the East Suffolk Council area were identified as recreating at the European sites.
- Ipswich Borough and Babergh Mid Suffolk have joined with East Suffolk 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 Norfolk Coasts, recognising that some European Sites straddle County boundaries and much of the coastline of East Anglia has both European Sites and recreational pressures. Suffolk Coast RAMS contributions will only be used within Suffolk.

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

- RAMS is an additional contribution, focused on delivering mitigation to European 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 not replacing any other scheme.
- 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, provided that extension is 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.
- East Suffolk is collecting RAMS for tourist accommodation.
- Zone of Influence map here:
<http://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=ec07051688d9460e918d3cc69829f9be> and here: <http://www.eastsuffolk.gov.uk/planning/s106/habitat-mitigation/>