

Report to Norfolk Strategic Planning Member Forum
14th December 2021

Report of Norfolk Strategic Planning Group
Subject Norfolk Green Infrastructure and Recreational Impact
Avoidance and Mitigation Strategy Update and Next Steps

Purpose

To consider progress made on the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy and proposals for further work.

Recommendation

To recommend the creation of a new board to oversee the delivery of the mitigation identified as being required to support the planned growth for the county.

To recommend the initiation of the review of the mitigation package based on details set out in this report to provide a detailed review of the mitigation needed at all individual Natura 2000 sites in the county

Financial implications

The RAMS review will require funding from the NSPF budget.

Contact officers

Trevor Wiggett, Programme Manager: 07557 489520

Further Information

None.

Background

Why has this study been completed?

1. Habitat Regulation Assessments (HRAs) are a legal requirement for Local Plans and are a soundness and legal consideration at examination, and a legal consideration at planning application stage. These Assessments are undertaken to ensure that the Plans policies and proposals will not result in any likely significant effects on

internationally recognised wildlife sites and, where the potential for such impacts arises, implement an agreed process of mitigation.

2. ALL Norfolk authorities Local Plans have been subject to HRA and conclude that the in-combination growth that is planned has the potential to have significant adverse impacts on designated wildlife sites (with the exception of the Broads Authority).
3. Local Planning Authorities (LPA) are the designated competent bodies and as such are responsible for ensuring that policies and proposals contained in their Local Plans do not have an adverse effect on the integrity of European sites. Without a relevant policy and the mitigation strategy in place some Local Plans could face legal and soundness challenges and there is a very real possibility that Natural England could start to object to planning applications on the basis that there is no Norfolk-wide mitigation strategy in place to address the cumulative impacts of growth. This would affect the delivery of housing in Norfolk.

Why a county wide approach?

4. Recreational pressures from growth and its impact on designated Habitats Sites is a cross boundary issue which affects all Local Plans in Norfolk. Individual authorities can only address the effects of growth within their own boundaries. The best available evidence categorically and irrevocably identifies likely significant effects from in combination growth as a result of cross boundary growth. With the best available evidence now clearly showing that the levels of growth proposed trigger in combination effects across the LPAs from growth that originates outside each LPA, the issue is better addressed at a more strategic level similar to the approach taken in many other parts of the county.

What has been completed?

5. Working through Norfolk Strategic Planning Member Forum, the member authorities have been developing a single shared approach to first understand the pressures and impacts of residential growth on European protected sites and then how to address potential impacts. Place Services were commissioned to develop the strategy on our behalf. They have successfully completed a similar strategy for Essex.
6. The Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy has been developed over a number of years through a steering group comprising of all Norfolk Local Planning Authorities and the County Council working together through the Norfolk Strategic Planning Framework, plus wider statutory bodies and key stakeholders such as Natural England, the Forestry Commission, the Environment Agency, the RSPB, The Wash and North Norfolk Coast Marine Partnership, the Norfolk Coast Partnership (AONB) partnership and Wild Anglia. The final strategy was completed in March 2021 based on the brief provided, the study is supported by Natural England and the evidence it provides supports Local Plans going through examinations

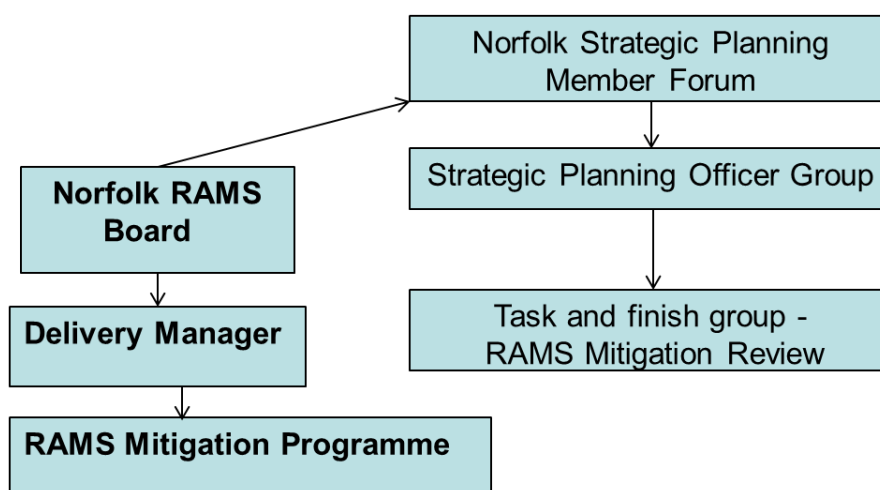
Proposals

County Wide Statement of Common Ground

7. A county wide Statement of Common Ground (SoCG) between all LPAs in Norfolk and Natural England is being finalised by officers. Some Local Authorities are implementing the tariff or have already implemented it, while others are waiting for the SoCG to be agreed.

Governance and Management of Fund

8. At a workshop held with members on the 15th November 2021 options were discussed for the collection, governance and management of the mitigation fund.



9. It is proposed that a new independent board is set up which:
 - Is responsible for overseeing the delivery of the mitigation identified as being required to support the planned growth for the county.
 - Agrees an annual programme of projects to be delivered by the Norfolk RAMS Mitigation Programme which will be funded wholly from the Norfolk RAMS Fund.
 - Provides an Accountable Body to oversee the proper administration of funds.
10. The Board would be made up of Members from all authorities and Ecologist and/or Planning Officers from all authorities. There may be other members of the board that support the board in an advisory role; this may include Natural England, The Environment Agency and Ecologists from other interested groups.
11. A Delivery Officer will be employed to oversee the work of the group. Their role will include:
 - Bringing forward projects for the programme based on where mitigation is required
 - Agreeing the programme with the RAMS Board
 - Overseeing the implementation of the programme
 - Monitoring the success of the mitigation, the ongoing impacts on sites and the suitability of the mitigation package going forward

12. At a workshop held with members, options for hosting the Delivery Officer were discussed. Following feedback, it is proposed that Norfolk County Council would act as host and full arrangements for this will be finalised once collection of the tariff is in operation.

RAMS Mitigation Package Review Study

13. Alongside the implementation of the tariff and the set-up of the governance of the RAMS, a review of the mitigation package will be completed. The key principles of the review will be to provide a more detailed mitigation package through:
- A detailed review of all individual Natura 2000 sites looking at site improvement plans, existing access and visitor management measures and identify other proposed measures within the protected sites
 - The identification of the degree of intervention needed to avoid likely significant effects based on visitor increases expected
 - Working with site managers/landowners to identify and prioritise the key projects and priorities
 - Maximising use of existing resources at sites
 - Capital over revenue where practical – for example this could include additional signage, fencing, footpaths and parking improvements at existing sites or the extension of a site to provide less impactful recreational routes
14. Officers are looking at the most cost-effective way to deliver this study whilst ensuring it delivers the best outcomes against the brief. The brief for this work is currently being finalised.