

From: Cllr. Victoria Holliday
Sent: 04 January 2024 07:08
To: Annette Feeney
Subject: Representations for hearing

Dear Annette

Here is my second representation for the hearings.

Thank you v much indeed.

Vbw

Inspectors matters 1.7

In relation to recreation effects, do ENV5 and GIRAMS ensure the necessary mitigation and is this strategy effective?

For the avoidance of doubt, I will continue to refer to the Norfolk Coast Area of Outstanding Natural Beauty rather than the new term of Norfolk Coast National Landscape, as the former is the term used by the new Planning Policy Framework.

In the Norfolk Coast Area of Outstanding Natural Beauty (AONB) Management Plan 2019-24 revised 2022, there are 7 Key Qualities of Natural Beauty. The most relevant to habitats is Key Quality 4, as follows:

‘Exceptionally important, varied and distinctive biodiversity, based on locally distinctive habitats, recognised by a range of national and international designations. Coastal habitats are particularly important and most famous for birds, supporting iconic species. Inland habitats are also important, particularly lowland heath.’

The Norfolk Coast AONB includes multiple designations, such as SPA, SAC, International Ramsar site, Natura 2000, SSSIs, and one Local Nature Reserve. It is difficult to find assessments of the habitat sites. I understand 95% of the AONBs SSSIs are in good condition but only comprise 27% of the total area of the AONB. In the absence of assessments of the other designated sites, I will use the AONB Management Plan assessment as a proxy.

The assessment of Key Quality 4 from 2014-19 was green (ie the key quality is being conserved and enhanced) for designated sites, amber (ie some grounds for concern) for the wider countryside.

In the 2022 update of the Management Plan, the assessment was downgraded to amber for designated sites, and kept at amber for the wider countryside. This is concerning.

The Management Plan commentary goes on to say:

‘Some of the most profile characteristic bird species are affected by pressure from coastal visitors. Turtle dove populations are decreased.’

Assessment of the ecological status of the area's rivers under the Water Framework Directive suggests that 17% of their lengths are in poor condition and over 80% in moderate condition.

Tourism related development has the potential for significant adverse impact through increasing pressure on sensitive habitats and species, especially on the undeveloped coast.'

It appears pressure on habitats will increase. Significant housing growth is anticipated in areas of the wider catchment of potential day visits to the area over the next five years and beyond, for example around Norwich, Great Yarmouth, Thetford, Kings Lynn, Peterborough and Cambridge.

Potential Environmental effects of development include:

- Water resources and effects on natural features dependent on these;
- Sewage and water treatment;
- Transport and traffic;
- Light pollution; and
- The tranquillity of the area.

These have the potential to adversely affect habitats.

Depending on the ability and resources to influence and manage recreational activities, increase in visitor numbers and housing development could have impacts on habitats through:

- Pressure in sensitive habitats and species, especially in coastal locations, through inadvertent damage and disturbance. There is already known pressure on sensitive habitats and species in some locations eg dunes and beach nesting birds, impacts on ground nesting, feeding and roosting birds from people walking dogs;
- Increased traffic levels and associated effects eg erosion of tranquillity, pressure for signage and infrastructure, increased air pollution and carbon emissions;
- Increasing noise from some recreational activities eg aircraft, jet skis; and
- Increased litter, dog fouling.

The Norfolk Coast AONB Management Plan 2019-24 cites the following mitigation policies:

- Improving communication of the area's special qualities;
- Improving understanding of visitor numbers esp to coastal Natura 2000 sites;
- Securing funding from new housing development within and outside the area likely to provide pressure on Natura 2000 sites to enable their mitigation;
- Developing messaging with tourism and communities about the promotion of the area; which include sensitivity to visitor and recreational pressure and capacity to manage these;
- Promoting ways for visitors to conserve and enhance features and qualities of the area, and minimise impacts from visitors to communities;
- Developing holistic and integrated management of recreation activities along the coast to provide opportunities that do not impact on sensitive sites, especially Natura 2000;

- Ensuring opportunities are available to enjoy the area without using the car; and
- Encouraging provision of appropriate visitor facilities and information that encourages suitable activities away from sensitive sites.

These policies are directed at recreational impact avoidance rather than creating new green infrastructure.

The Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy March 2021 suggests the key recreational disturbance identified for North Norfolk is from walking and there are multiple locations for disturbance impacts in North Norfolk. The key mitigation options offered are wardens, alternative routes, fencing, habitat creation and species monitoring.

The total mitigation package offered as part of this strategy is estimated at almost £8 million. This does not seem to include alternative walking routes or the provision of green infrastructure (other than that provided by developers) as would be needed to counter walking disturbance to habitats.

The GIRAMS tariff is currently £210.84. I understand developer contributions must be reasonable and justifiable but I am concerned there is insufficient provision for mitigations (both for RAMS and GI) to counter the specific disturbance to habitats seen in North Norfolk.

Victoria Holliday