



**Planning & Economic Growth Committee**  
**07 January 2025**

## **Green Infrastructure Recreation Avoidance Mitigation Strategy (GIRAMS Action Plan and GIRAMS Governance)**

**Report Author(s):** Adam Banham  
Place Shaping Manager  
01603 430505  
Adam.Banham@southnorfolkandbroadland.gov.uk

**Portfolio:** Planning and Economic Growth

**Ward(s) Affected:** All

### **Purpose of the Report:**

This report updates councillors on joint work by the Norfolk Planning Authorities to protect the county's most important natural habitats, such as the Broads, from the pressures of increases in visitor numbers. Agreement is sought countywide for setting a revised tariff of £293.53 per new dwelling built and jointly employing a delivery manager to coordinate spending on projects that will mitigate the impact of visitor pressure on Norfolk's most important natural habitats.

### **Recommendations:**

The Planning and Economic Growth Committee recommend Cabinet to agree to:

1. The increase to the existing Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) from £221.17 to £293.53 per property.
2. The employment of a delivery manager funded through tariff contributions who reports into the Norfolk Recreation Avoidance Mitigation Strategy (RAMS) Board.
3. Recommend to Council appointment to the Norfolk RAMS Board of an elected councillor with relevant portfolio.

## **1. Summary**

- 1.1 The current Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) was introduced in 2020. Each of the 8 Norfolk Planning Authorities are collecting the GIRAMS tariff from qualifying development, but in 2023 to further this work Footprint Ecology were appointed to review and refine the existing mitigation approach. Following the work by Footprint Ecology, and after further consideration of the governance arrangements, elected councillors across the Norfolk Planning Authorities are now being asked to consider amended proposals.
- 1.2 The GIRAMS Action Plan (Appendix 1) by Footprint Ecology identifies over 70 individual projects, which apply to the varied habitats amongst which are the East Coast, Norfolk Valley Fens, North Norfolk Coast, Broads, and Wash. Some of the projects are generic to all sites, whereas others are specific to certain habitats, and the projects range in short, medium, and long-term timescales.
- 1.3 The cost of implementing the new GIRAMS Action Plan across Norfolk is estimated at £22 million. To fund these projects elected councillors from each authority are being asked to agree that the GIRAMS tariff for every new home built in Norfolk is increased from £221.17 to £293.53.
- 1.4 In respect of the governance arrangements for implementing the GIRAMS mitigation projects, it is still intended to setup the Norfolk Recreation Avoidance Mitigation Strategy (RAMS) Board and for it to be led by elected councillors from all the Norfolk Planning Authorities. However, rather than it being coordinated by Norfolk County Council has had been originally envisaged, agreement is now sought for Norwich City Council to employ a GIRAMS delivery manager on behalf of all the Norfolk Planning Authorities.

## **2. Background**

- 2.1 Many of Norfolk's natural habitats have the highest protection under the UK'S environmental laws, but they are also popular places for people to access the countryside. Increased numbers of visitors causes habitat damage. To mitigate the effects of new housing and in turn more visitor pressure the concept behind GIRAMS is for developers to pay a tariff for each new home built to fund habitat mitigation projects.
- 2.2 The types of damage caused by visitor pressure include vegetation trampling, contamination from litter and dog fouling, disturbance to wildlife, and fire. To address these threats mitigation measures can be varied, but they generally focus on providing the right infrastructure and influencing people's behaviour, such as by installing boardwalks to reduce trampling of the habitat or installing warning signs to keep visitors away from nest locations.
- 2.3 The legislative background to GIRAMS is the Conservation of Habitats and Species Regulations 2017. This says the Council in its role as Local Planning Authority has a legal duty to ensure that its plans and projects will not have an

adverse impact on protected sites. The sites in question continue to be collectively described as 'European sites', and these include Special Protection Areas (SPA) classified under the 1979 Birds Directive, Special Areas of Conservation (SAC) designated under the 1992 Habitats Directive, as well as 'Wetlands of International Importance' (or Ramsar sites).

- 2.4 The GIRAMS approach being taken in Norfolk is widely recognised as preferable to dealing with visitor pressure on a development-by-development basis, and similar approaches have been taken for other places such as the Dorset Heaths, Northumbria Coast, Poole Harbour, South Pennine Moors, Suffolk Coast, and Thames Basin Heaths. Whilst acknowledging that the pattern of where people travel from to visit sites is complex and variable, a collective strategic approach with a single tariff to administer is an effective way to proceed, which has previously been agreed by the Norfolk Planning Authorities.
- 2.5 This latest GIRAMS Action Plan thoroughly evidences the mitigation projects needed across Norfolk's protected wildlife sites and the costs of delivering those projects, and the Norfolk tariff is comparable with other GIRAMS schemes across the country. Tariffs vary from place to place, with the exact tariff in every location varying depending upon the extent of protected wildlife sites, the cost of the mitigation required for those habitats, and the size of anticipated housing growth by which the tariff can be spread.

### **3. Current position/findings**

- 3.1 Each of the Norfolk Local Planning Authorities (LPAs) has adopted the Norfolk GIRAMS and are collecting relevant contributions from qualifying development. However, as GIRAMS contributions are only payable on the commencement of development there is an inherent lag between new planning permissions being issued and the contributions being received by the councils, which has been exacerbated by the restrictions on new planning permissions caused by Natural England's Nutrient Neutrality advice.
- 3.2 Despite the delays to planning permissions caused by Nutrient Neutrality, the monies for GIRAMS held by the 8 Norfolk LPAs will begin to build-up, and so it is necessary to have a programme of mitigation projects ready, and these next steps are being made. As is described in this report, the next steps are for the GIRAMS Action Plan to provide a programme of 'on the ground' mitigation projects, for the increase in tariff to £293.53 to ensure funding is available, and to employ a delivery manager to report to the Norfolk RAMS Board.

### **4. Proposed action**

- 4.1 All the Norfolk LPAs recognise the potential for the most important 'European' designated wildlife sites to be adversely affected by visitor pressure arising from new residential development, and through the GIRAMS Action Plan by Footprint Ecology has undertaken research to understand these impacts. The results evidence the visitor pressures on protected wildlife sites, identifies the mitigation projects needed to protect them, and costs how much those projects will be to implement.

- 4.2 The GIRAMS Action Plan identifies a range of projects across Norfolk costing £22 million that over the next 22 years needs to be funded through development. This equals an increase on the existing GIRAMS tariff paid by developers from £221.17 to £293.53 per property.
- 4.3 To oversee the governance for spending and implementation of mitigation projects it has already been agreed to establish a board made up of elected councillors and supported by ecologists and planning officers from all 8 Norfolk LPAs, which will be called the Norfolk Recreation Avoidance Mitigation Strategy (RAMS) Board. To support the Norfolk RAMS Board, it will be necessary to employ a delivery manager who will provide a secretariat function and be responsible for ensuring the Norfolk RAMS Programme meets its objectives.
- 4.4 To progress matters, a Memorandum of Understanding (Appendix 2) makes clear the agreed working relationship between the 8 Norfolk Local Planning Authorities who will form the RAMS Board, which also has its own Terms of Reference (Appendix 3). Whilst not creating legally binding obligations, the Memorandum of Understanding explains how the 8 authorities agree to pool all the GIRAMS contributions they collect into a single RAMS Fund, and that decisions for spending and implementation of mitigation projects will be overseen by the Norfolk RAMS Board.
- 4.5 Norwich City Council is willing to employ the delivery manager and hold the central pool of monies collected into the Norfolk RAMS Fund. This approach takes advantage of existing joint-working arrangements as Norwich City Council already employs the Norfolk Strategic Framework Programme Manager to whom the new delivery manager for RAMS would report.
- 4.6 Subject to all 8 Norfolk LPAs agreeing the proposals in this report, it should be possible to recruit the delivery manager in Spring 2025 and for the RAMS Board to begin meeting from the first half of 2025 onwards. In due course the higher GIRAMS tariff will be applied.

## **5. Other options**

- 5.1 Increasing the GIRAMS tariff to £293.53 per property is the only viable option, because not increasing it could leave a funding shortfall for mitigation projects. Potentially jeopardising the Council's duties under Habitat Regulations and undermining the coordinated approach being taken by all the Norfolk Planning Authorities.
- 5.2 The proposal for Norwich City to employ a GIRAMS delivery manager who will report to all the Norfolk councils via the Norfolk GIRAMS Board is the only option currently available. The alternatives to setup a scheme managed by Norfolk County Council proved unsuccessful and Norfolk Environmental Credits decided to focus on Nutrient Neutrality.

## **6. Issues and risks**

- 6.1 **Resource Implications** – The governance arrangements proposed here will be met within existing Council resource and/or within the agreed budgets for the Norfolk Strategy Planning Framework function. Costs associated with the establishment of the delivery manager post will be met through GIRAMS contributions.
- 6.2 **Legal Implications** – The Council, in its role as Local Planning Authority, is a competent authority under the Habitat Regulations. As such it has a legal duty to ensure that plans and projects will not have an adverse impact on the designated assets of designated Habitats, such as when adopting its local plan or granting planning permission.
- 6.3 A Memorandum of Understanding makes clear the agreed working relationship between the 8 Norfolk Local Planning Authorities who will form the RAMS Board. It is not intended to be legally binding on any of the councils, can be updated or terminated when deemed necessary, and this approach has been used before such as for the Norfolk Mitigation Fund for Nutrient Neutrality.
- 6.4 **Equality Implications** – There are not considered to be any equalities implications directly relating this report, but some projects delivered under the GIRAMS programme may have equalities implications. These will be assessed and considered appropriately as part of the consenting process for those projects.
- 6.5 **Environmental Impact** – The report relates directly to the implementation and delivery of a programme considered necessary to protect designated international Habitat Sites as set out in the legal implications section.
- 6.6 **Crime and Disorder** – There are not considered to be any crime and disorder implications related to this report.
- 6.7 **Risks** – There are not considered to be any risks other than those outlined elsewhere in the report.

## 7. **Conclusion**

- 7.1 For the reasons set out in this report increasing the GIRAMS tariff and funding a GIRAMS delivery manager is considered the most appropriate course of action. Following this approach will ensure that all 8 Norfolk LPAs have an agreed means of delivering the projects in the GIRAMS Action Plan to protect the county's most important natural habitats.

## 8. **Recommendations**

The Planning and Economic Growth Committee recommend Cabinet to agree to:

1. The increase to the existing Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS) from £221.17 to £293.53 per property.
2. The employment of a delivery manager funded through tariff contributions who reports into the Norfolk Recreation Avoidance Mitigation Strategy (RAMS) Board.
3. Recommend to Council appointment to the Norfolk RAMS Board of an elected councillor with relevant portfolio.

## **Background papers**

None

## **Appendices**

Appendix 1: Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan, Footprint Ecology, June 2024

Appendix 2: Memorandum of Understanding -- Norfolk Recreational Impact Avoidance and Mitigation (RAMS) Programme Fund Governance and Management, October 2024

Appendix 3: Terms of Reference -- Norfolk Recreational Impact Avoidance and Mitigation (RAMS) Programme Governance; and, Norfolk Recreational Impact Avoidance and Mitigation Strategy Board (Norfolk RAMS Board); April 2024