



**British Association for Shooting and Conservation
Response to Essex RAMS Consultation v1**

Section Para Table	Comment
<p>1.1 This Supplementary Planning Document (SPD) focuses on the mitigation that is necessary to protect the wildlife of the Essex coast from the increased visitor pressure associated with new residential development in-combination with other plans and projects, and how this mitigation will be funded</p>	<p>Walking with or without a dog has been found to be the most disturbing activity recorded in numerous scientific studies on the impact of recreational disturbance on coastal birds</p> <p>See for example a PHD study carried out in Poole harbour on this topic: https://pdfs.semanticscholar.org/c6db/0bbd65eac6efbf9a93963263f6534f6e5d56.pdf</p> <p>The proposed mitigating measures will not address increased visitor pressure associated with new residential development along the Essex coast.</p> <p>Please provide BASC with evidence of how the proposed mitigation measures will be successful in mitigating the impact of increased visitor pressure.</p> <p>Please provide information to BASC on the areas that have been identified and permissions granted to allow this work to be undertaken prior to planning consent being granted.</p> <p>Any new car parks must be located away from sensitive areas and local byelaws must be introduced to restrict the public from walking and walking with dogs.</p> <p>Adequate regulation and enforcement must be in place prior to planning being approved.</p>
<p>1.2 This SPD accompanies the strategic approach to mitigation which is set out in the Essex Coast Recreational</p>	<p>No evidence has been provided on how the employment of a ranger will be sufficient mitigation for the impact of increased visitor pressure on breeding and overwintering wildfowl.</p> <p>Please provide BASC with information on the inclusion of the ranger's work in the HRA process.</p>

<p>disturbance Avoidance and Mitigation Strategy (the 'RAMS'). The RAMS provides a mechanism for Local Planning Authorities (LPAs) to comply with their responsibilities to protect habitats and species in accordance with the UK Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations').</p>	
<p>2.2 The coast is a major destination for recreational use such as walking, sailing, bird-watching, jet skiing and dog walking. Evidence, described in detail in the RAMS, suggests that the majority of this activity is undertaken by people who live in Essex.</p>	<p>Wildfowling must be included as a recreational activity.</p>
<p>2.9 The published Habitats Regulations Assessments (HRAs) for the relevant Local Plans have identified recreational</p>	<p>Please provide BASC with written confirmation that when increased visitor pressure is caused by new residential development that this will not result in additional "in combination" effects with existing wildfowling consents.</p> <p>We are concerned that when new residential development inevitably leads to visitor pressure increases that regulated activities such as wildfowling will be targeted as a means of addressing failures with RAMS.</p>

<p>disturbance as an issue for all of the Essex coastal SPAs, SACs and Ramsar sites.</p>	<p>Any new impact on the features of the designated sites caused by unregulated increased visitor pressure associated with new residential development should not affect regulated recreational activities already in existence.</p>
<p>2.12 Mitigation measures are therefore necessary to avoid these likely significant effects in-combination with other plans and projects. Mitigation at this scale, and across a number of LPAs, is best tackled strategically and through a partnership approach. This ensures maximum effectiveness of conservation outcomes and cost efficiency.</p>	<p>Representatives of wildfowling clubs along the Essex coast must be included in the proposed partnership approach.</p>
<p>2.14 4th para It provides an evidence based and fair mechanism to fund the mitigation measures required as a result of the planned residential growth; and</p>	<p>Merely stating that there will be some creation of salt marsh etc. will not be sufficient for a HRA process.</p> <p>Please provide information to BASC on the actions that would need funding.</p> <p>Permissions must be sought, projects must be highlighted and plans put in place to ensure they are able to meet the conservation objectives required to mitigate the original issue.</p> <p>If the action were to take place 5 years down the line the damage could have already been done.</p> <p>Please confirm to BASC that the precautionary principle will be applied in this case.</p>
<p>3.11 In order to consider RAMS contributions at the outline</p>	<p>The HRA must include maximum permissible occupancy of those dwellings as it is the individuals within the dwelling that will increase the visitor pressure, not the dwelling itself.</p>

<p>application stage, the application should indicate a maximum number of dwelling units.</p>	
<p>3.14 The alternative is for the applicant to provide information for a project level HRA/AA and secure bespoke mitigation to avoid impacts on Habitats sites in perpetuity</p>	<p>A precedent has been set that every application needs to be looked at on its individual merit. A blanket policy would be unlawful.</p>
<p>Table 4.1 Education and Communication</p> <ul style="list-style-type: none"> • A coastal code for visitors to abide by 	<p>A voluntary code will not mitigate increased visitor pressure caused by new residential development.</p> <p>Bye-laws restricting the public from walking and walking with dogs will be required to mitigate increased visitor pressure.</p>
<p>Table 4.1 Education and Communication</p> <ul style="list-style-type: none"> • Through direct engagement led by rangers / volunteers 	<p>Wildfowling actively warden the area's they manage along the Essex coast.</p> <p>Funding from RAMS should be allocated to wildfowling clubs to employ club representatives to assist with direct engagement with the public.</p> <p>Please add wildfowling clubs as key partners in the RAMS.</p>
<p>Table 4.1 Education and Communication</p> <ul style="list-style-type: none"> • Direct engagement with clubs e.g. sailing clubs, ramblers clubs, dog clubs and local 	<p>Please include wildfowling as a recreational activity in the RAMS.</p>

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<p>Table 4.1 Habitat Based Measures, Pedestrian (and dog) access</p> <ul style="list-style-type: none"> • Zoning • Prohibited areas • Restrictions of times for access e.g.to avoid bird breeding season 	<p>A severe weather policy must be drafted to use bye-laws to restrict the public from walking or walking with dogs during periods of severe weather. See the JNCC Severe Weather Policy as a reference point.</p>
<p>Table 4.1 Habitat Based Measures, Habitat creation</p> <ul style="list-style-type: none"> • Saltmarsh recharge, regulated tidal exchange and artificial islands may fit with Environment Agency Shoreline Management Plans 	<p>Residential developers must consult wildfowling clubs along the Essex coast.</p>
<p>Table 4.1 Habitat Based Measures, Partnership Working</p> <ul style="list-style-type: none"> • Natural England, Environment Agency, RSPB, Essex Wildlife Trust, National Trust, landowners, local clubs and societies. 	<p>BASC and wildfowling clubs along the Essex coast must be included within the partnership network.</p>

<p>Table 4.1 Habitat Based Measures, Monitoring and continual improvement</p> <ul style="list-style-type: none"> • Birds and visitor surveys, including a review of the effectiveness of mitigation measures. Outputs of the review may include the introduction of new ways to keep visitors engaged 	<p>BASC and wildfowling clubs along the Essex coast must be included in future planning phases and in any review of the effectiveness of mitigation measures.</p>
<p>Additional general comments</p>	<p>It is inevitable that the creation of new residential development along the Essex coast will lead to increased visitor pressure on designated sites.</p> <p>Bye-laws restricting walking and walking with dogs could mitigate increased visitor pressure.</p> <p>Preventing or restricting any further residential development along the Essex coast is the most appropriate means of mitigating increased visitor pressure.</p>