

# RECREATION MITIGATION AND MANAGEMENT SCHEME



**PLYMOUTH SOUND AND ESTUARIES  
EUROPEAN MARINE SITE NOVEMBER 2019**



# PLYMOUTH SOUND AND ESTUARIES EUROPEAN MARINE SITES

## Recreation Mitigation and Management Scheme

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## 1. SUMMARY

- 1.1. The waters of Plymouth Sound and the Tamar Estuaries contain some of the richest marine habitats and provide important feeding and roosting grounds for wintering birds. In order to safeguard these areas they have been designated as a Special Protection Area and Special Area of Conservation and as such must be safeguarded to ensure that the underwater habitats remain undisturbed, water remains clean, fish are able to swim undisturbed and the migratory birds are able to feed and rest undisturbed. Collectively these waters are known as the Plymouth Sound and Estuaries European Marine Site.
- 1.2. Over 16,000 new homes are planned in around Plymouth Sound and Estuaries up to 2034. Research has shown that these will lead to more people visiting the estuary and coast for recreation, potentially impacting on the marine habitats, species and birds.
- 1.3. The Scheme set out in this document aims to prevent disturbance to the designated features arising from increasing recreational activities.

## ACKNOWLEDGEMENTS

- 1.4. This report draws heavily on work carried out by the Solent Recreation Mitigation Partnership and the South East Devon Partnership and the author is grateful to the time that Anna Parry and Neil Harris gave in explaining their approach and in sharing their documentation.
- 1.5. Officers of Natural England were also supportive of the process and in particular Corine Dyke, Carol Reader and Amanda Newsome who between them provided help and guidance throughout.
- 1.6. The officers of Cornwall Council and of West Devon Councils were also invaluable in providing feedback and support.

## 2. INTRODUCTION

- 2.1. The waters of the Plymouth Sound and the Tamar Estuaries are internationally important for wildlife and include key marine habitats including sandbanks, estuaries, shallow inlets and bays, reefs and saltmarshes. These sheltered waters are protected and are home to the protected Allis shad migratory fish and other protected species and also provide important feeding and roosting areas for little egret and avocets which are both protected birds. The Plymouth Sound and Estuaries Special Area of Conservation (SAC) and the Tamar Estuaries Complex Special Protection Area (SPA) are both designated by the Government to protect these key features and species (see Figure 1). Together these sites for the Plymouth Sound and Estuaries European Marine Site (EMS).



**Figure 1: Plymouth Sound and Estuaries European Marine Site**

- 2.2. The Conservation of Habitats and Species Regulations 2017 (the Habitat Regulations), requires mitigation for any impact which a proposed development, in combination with other plans or project, is likely to have on a European site. It requires local planning authorities to ensure that the necessary mitigation will be provided before planning permission is granted.
- 2.3. The Habitat Regulations Assessments of both the Plymouth and South West Devon Joint Local Plan and the Cornwall Local Plan both identified that the development of the new houses in both areas would lead to increased levels of recreational activity which would be likely to have a significant effect on the designated features of both the Plymouth Sound and Estuaries Special Area of Conservation and the Tamar Estuaries Complex Special Protection Area. Both documents therefore stipulated that recreational management would be required in order to ensure that there are no likely significant effects on the European sites.
- 2.4. This document therefore sets out the required strategic approach to the provision of mitigation for increased recreational impacts on the Plymouth Sound and Tamar Estuaries European Marine Site arising from new housing and tourism growth up to 1934. It does not address the impact of existing activities, which is the role of the separate Tamar Estuaries Management Plan and the 'European Marine Site Managing Recreational Impacts Programme Phase 1' project. It should also be noted that

the Scheme does not deal with any other impacts on the SPAs such as loss of habitat, increased noise, effect on water quality etc – which may arise directly from new housing, or the potential impact of other types of development such as new employment sites. Separate mitigation may be required to address these additional impacts on the SPAs that arise from new development. These will be assessed by the local planning authorities, with advice from Natural England, at the planning application stage.

- 2.5. This scheme enables a housebuilder to make a monetary ‘developer contribution’ for the strategic mitigation of recreational pressures that would otherwise occur over a wide area, instead of needing to provide bespoke mitigation themselves. A developer can still provide their own mitigation, if they have the ability to do so, but for the vast majority it will be simpler, quicker and less costly to make a contribution towards the scheme. This approach provides clarity and certainty for both developers and local planning authorities. It helps to deliver coordinated and effective mitigation, whilst simultaneously speeding up the development approval process and reducing the costs for all parties. It also provides a means for mitigating the impact of small developments for which it would not be practical to provide bespoke solutions.

### 3. LOCAL PLANS AND MITIGATION OF RECREATIONAL IMPACTS ON EUROPEAN SITES

#### THE NEED FOR MITIGATION

- 3.1. The waters of Plymouth Sound and Estuaries contain designated habitats and features which are protected by The Conservation of Habitats and Species Regulations 2017 (the Habitat Regulations). The wide range of recreational activities which take place within these waters can cause disturbance to the habitats and features.
- 3.2. Human disturbance of the features of both the SAC and the SPA come in many forms and can have several impacts. For the SAC, recreational activities can cause damage to the seabed, can result in the removal of key fish species and can result in pollution of the water. Recreational activities can also impact on the features of the SPA and in particular the birds by introducing noise and visual disturbance or by damaging their supporting habitats.
- 3.3. Ultimately, the consequences of human disturbance can be damaging to key habitats and can increase fish and bird mortality which can together lead to a reduction of the bird and fish populations and the extent of the key habitats.
- 3.4. Extensive research was carried out during 2015-2016 by the Marine Biological Association to carry out a sensitivity analysis and to then undertake a recreation study within the EMS. This work was known as the “EMS Recreation Study (Langmead, Tillin, Griffiths, Bastos, Milburn, Butler & Arnold 2017) and was commissioned by Plymouth City Council working under the Duty to Cooperate with Cornwall Council, South Hams District Council and West Devon Borough Council. This work consisted of two stages; the first stage was a scoping report to identify the conservation features of the EMS, their sensitivity and potential overlap with recreational activities. The second stage was a survey of the distribution and frequency of recreational activities within the EMS based on on-site surveys, workshops and an on-line survey. GIS analysis enabled key ‘hot-spot’ areas to be identified where there was an overlap between areas with features which were particularly sensitive to recreational activities, and also areas where there were high levels of recreation.
- 3.5. Terrestrial activities accounted for the majority of visitors surveyed both on-site and online. There were clear preferred locations that emerged from the on-site surveys within the EMS (upper Tamar (Calstock-Cotehele area), the Tavy (Lopwell Dam – Bere Ferrers area), Hoe (Devil’s Point to Barbican) and the coast path between Mount Batten and Wembury. The online survey indicated that the Outer Estuary and the Open Coast were also heavily used.
- 3.6. The most popular marine-based recreational activities were canoeing/kayaking, angling, sailing and swimming and was consistent between the on-site and on-line surveys. Most activities showed similar distribution and intensity between the approaches used to gather the spatial data, aside from

paddle-sports which had contrasting patterns of use between the on-site surveys (showing high intensities of activity in the upper parts of the estuaries (Tamar, Tavy, Yealm), and the targeted workshops and online survey which indicated most activity was occurring within the Plymouth Sound.

- 3.7. The same research also highlighted the sensitivity of the designated features to all of these activities and even through the level of impact for each occurrence can be low, when taken together they can result in significant cumulative impacts on the features.
- 3.8. The visitor surveys identified where people were travelling from in order to access both the shores and waters of the EMS for recreation. It found that the closest 75% of visitors were originating from within a 12.3km for the SAC and 12.1km for the SPA.
- 3.9. In light of this, a package of appropriate mitigation measures has been drawn up in consultation with Natural England. Drawing on an evaluation of measures used elsewhere in the UK including the Solent and the Exe, the following measures are recommended:
  - Projects and capital works
  - Monitoring
  - Wardening and Project Management
- 3.10. The evidence showed that mitigation should be required from all dwellings built within 12.3km of the boundaries of the EMS. This is a precautionary approach and is based on the zone from which 75% of coastal visitors live who visit the SAC. The zone for the SPA is slightly less, but in order to take a precautionary approach and to simplify the approach, a 12.3km zone of influence will be adopted for the EMS as a whole. [Click here for an interactive map of this 12.3km zone of influence.](#)
- 3.11. The measures proposed are based on best practice from elsewhere including the Solent and the Exe and from guidance documents produced by Natural England. These are listed in the References chapter.

## RECREATIONAL IMPACTS MANAGEMENT ARISING FROM PREVIOUS DEVELOPMENT

3.12. This is not the first time that recreational pressures have been identified as an issue that requires management solutions. They were also identified as a pressure arising from development brought forward through the Plymouth Local Development Framework and Core Strategy of 2006 – 2021. These have been managed and mitigated through the European Marine Site Managing Recreational Impacts Programme Phase 1. During this period of 2006 – 2021, contributions have been collected under the previous scheme as set out in Plymouth City Council’s Planning Obligations Supplementary Planning Document. Later the Council adopted the Community Infrastructure Levy (CIL) and published the Regulation 123 List which identified the PSEEMS as one of the infrastructure projects to be funded through the CIL. This has enabled funding to be collected in order to deliver the following key actions:

- Monitoring assessment in the form of a Recreation Study;
- Specific action plans for the recreational activities known to have the highest potential for inflicting damage to the sensitive species and features of the PSEEMS;
- Development of a shared management system for use by all the of the licensing authorities;
- Little egret and avocet study into the use of the site by these birds;
- Programme of information boards and media messages on the marine environment;
- Development and installation of special bins to collect angling debris;
- Workshops and consultation events to work with user groups and stakeholders to deliver targeted and effective messaging;
- Employment of 1FTE officer to deliver the project for 3.5 years.

- 3.13. In total, a budget of £264,706 has been allocated to the delivery of the measures and as of 2019, the majority of this has been spent with many of the work items having been delivered and the rest in hand for delivery over the remainder of the phase I period.
- 3.14. Whilst the mitigation measures set out in the remainder of this document sit by themselves because they relate to pressures from future development, they also need to be seen within the context of the previous actions. As time passes, the process becomes more refined as the evidence emerges to highlight where actions need to be targeted.

## 4. OVERALL APPROACH AND BENEFITS

- 4.1. The aim of this scheme is to prevent any net increase in recreational disturbance as a result of additional recreational pressures arising from the approximately 13,500 new dwellings which are planned around the Plymouth Sound and Estuaries European Marine Site (PSEEMS). This will be achieved by:-
- Raising awareness and encouraging behavioural change of visitors to the PSEEMS;
  - Implementing projects to better manage visitors and provide secure habitats.
  - Implementing improved management systems and monitoring.
- 4.2. This overall approach of better managing visitors to the coast, rather than attempting to restrict access through bylaws, permits etc, reflects research which found that the level of disturbance is determined more by peoples' behaviour than purely by the number of visitors. So raising awareness of the value of the features is critical as well as explaining where their behaviour is inappropriate.
- 4.3. Based on the findings on the sensitivity study carried out in the Langmead, Tillin, Griffiths, Bastos, Milburn, Butler & Arnold 2017 report, this scheme places a particular focus on sailors, divers, kayakers and anglers. So the package of mitigation measures comprises:

### Projects and capital works

- Voluntary codes of conduct
- Provision of adequate litter receptacles
- Funding of marine litter clean ups.
- Awareness raising of sensitive habitats including the development of user-scale maps.
- 'Check, Clean, Dry' signage, leaflets, stickers.
- Educational workshops and roadshows.
- Reconfiguration of existing moorings and installation of eco-moorings (Advanced Mooring Systems) or trot moorings.

### Monitoring

- Recreational boat activity surveys for whole site.
- Detailed recreational usage, activity and impacts survey and monitoring of activity around seagrass.

### Wardening and Project Management

- Project Coordinator
- Marine Recreation Officer and Summer Marine Recreation Ranger
- Project running costs

- 4.4. These measures are described in more detail in the next section. Implementation of these measures will help avoid disturbance of habitats and species which are protected under European and national legislation.



## 5. THE MITIGATION MEASURES

- 5.1. This section sets out the mitigation measures required. Much of it continues on the work which has been started under the Phase I of the Recreation Impacts Project which makes delivery more efficient as the ground works have already been carried out.

### Project and capital works

- 5.2. **Voluntary codes of conduct** are a key tool for encouraging changes in behaviour and they will be developed in conjunction with user groups and will include water users, anglers, dog walkers and also airborne drone pilots.
- 5.3. Codes of conduct are an effective means of changing behaviour, particularly when developed in cooperation with clubs. They are easily made available through the site website and via social media, and can be promoted to visitors through signs at locations where the activities take place. By involving the clubs through the Port of Plymouth Marine Liaison Committee and directly, it is ensured that appropriate language is used and the material is disseminated to all users.
- 5.4. **Provision of adequate litter receptacles:** Effective litter management is critical to the health of the EMS and so it is important that the appropriate bins are provided which are fit for purpose. Poorly designed bins exposed to wind and seagulls do little to keep the waters litter free. Grants will be offered to replace any smaller poorly designed bins with those better designed to keep litter in.
- 5.5. Fishing waste is known to enter the EMS and can result in ghost fishing with subsequent fatalities as well as smothering of the marine habitats. The bins have been trialled in parts of the area under Phase I and this work will continue under this Mitigation Plan. This work will therefore include the installation of additional fishing bins along with the associated waste disposal service at key sites.
- 5.6. Signage and awareness raising is also associated with education about the issues around litter and this will be done on the site information boards but also through the wardens who can raise awareness through their interactions. Again, this will continue the work carried out under Phase I of the Recreation Impacts Project.
- 5.7. **Funding of marine litter clean ups:** Despite the best actions, litter will still enter the EMS and it is important that this is tackled on a regular basis particularly through local dive clubs to tackle those sites where rubbish is known to collect. Equipment will be funded to support new beach clean ups e.g. through voluntary groups, parish councils and resident associations.
- 5.8. **Awareness raising of sensitive habitats including the development of user-scale maps:** map-based information will also be important and will be further developed to deliver targeted information and signage will be updated and replaced every eight years.
- 5.9. **'Check, Clean, Dry' signage, leaflets and stickers:** Recreational boat owners can lead to an increased risk of non-native invasives entering the EMS and colonising the waters. Material will be printed and circulated to ensure that all water users understand what they need to do to minimise the risk.
- 5.10. **Educational workshops and roadshows:** This will include workshops targeted at boat clubs and marinas as well as displays at newly expanded holiday parks and activity centres.
- 5.11. **Implementation of Pollution Prevention Guidelines:** through the Warden Service work will be undertaken to ensure that key waterfront recreational sites are fully aware of what they can do to minimise the risk from pollution.
- 5.12. **Reconfiguration of moorings to remove them from sensitive sites and installation of Advanced Mooring System or trot moorings.** This work includes work related to the implementation and review of the mooring and anchoring strategy to ensure no increased impacts on sensitive features. Work will also be undertaken to reconfigure existing moorings and replace existing moorings and/or install new Advanced Mooring System or trot moorings where it will discourage increased anchoring impacts on designated features.

## Monitoring

- 5.13. Monitoring of the effectiveness of the measures will be critical to the effectiveness of the Recreation Mitigation Scheme. Developing a maintaining a research and monitoring database for the EMS to enable informed management actions will be carried out and regular monitoring of the scale, distribution and type of boating activities will be carried out.
- 5.14. Ongoing monitoring of the recreational usage of the SAC / SPA including known pressures such as anchoring and mooring activities will also be undertaken to identify any changes in usage and impacts arising from new and increasing levels of activity which may require additional mitigation actions.

## Wardening and Project Management

- 5.15. The Marine Recreation Officer/s are a key mitigation measure who will establish themselves and make contact with user groups and have an on the ground presence at key sites. With such a long coastline to cover, they will need to focus their time on key hot-spot areas and on liaising with key user groups. They will also meet with landowners and other stakeholders, install signs and interpretation, assist with dog walking initiatives, staff events and prepare codes of conduct in liaison with local clubs. They will also be involved in site monitoring.
- 5.16. One full time equivalent plus one seasonal ranger will be recruited so that there is additional resource during the busiest times.
- 5.17. Project management will be carried out through a part-time Project Coordinator (1 day / week) provided by Plymouth City Council.

## 6. RESOURCE COSTS AND FUNDING

- 6.1. Implementation of the mitigation measures set out in the preceding section will require resources – a mix of staff and funds for projects, communications and monitoring.

## Wardening and Project Management

- 6.2. The cost of the Marine Recreation Officer/s and the seasonal Marine Recreation Ranger (one full time and one seasonal) is based on staff costs plus on costs. The ranger and officer/s will also both liaise with the user groups and introduce codes of conduct.
- 6.3. A dedicated Project Coordinator will also work on this project one day a week to oversee the delivery of this mitigation scheme, coordinating delivery, managing the staff and providing the necessary reporting. In practice this is likely to be the TECF Coordinator to ensure full integration with the wider management for the area including the Yealm Estuaries Management Group (YEMG) and Estuaries Officer.
- 6.4. An operating budget will fund the procurement of graphic skills, IT staff time for the website, leaflet printing etc. plus contingencies.

## In-perpetuity

- 6.5. This scheme mitigates the recreational impact of new housing up to 2034, but the mitigation measures need to be in place for the duration of the impact. This is broadly accepted as being for 80 years which is the same time adopted for the Solent and South East Devon Site Mitigation Strategies.
- 6.6. Costs for delivering the mitigation scheme through for a further 80 years have been calculated as shown in Appendix A

## Funding

6.7. The resource costs will need to be funded from developer contributions. Those costs are summarised in the table below and are set out in detail in Appendix A.

**Table 1: Summary of total costs**

Description	Plan Period Costs £	In perpetuity Costs £	Total £
<b>Projects &amp; Capital Works</b>			
Codes of conduct, signage, workshops, angling waste bins, underwater clean-ups, awareness raising, interpretation and mooring management.	345,900	380,000	725,900
<b>Monitoring</b>			
Boat, usage, activity and impacts, and recreational impacts.	71,000	285,000	356,000
<b>Wardening &amp; Project Management</b>			
Staffing including Project Coordinator, Officer/s, Ranger and operating costs.	1,244,390	3,646,494	4,890,884
<b>NET TOTALS</b>	<b>1,661,290</b>	<b>4,311,494</b>	<b>5,972,784</b>
<b>Contingency @ 5%</b>	<b>83,064</b>	<b>215,575</b>	<b>298,639</b>
<b>GROSS TOTAL</b>	<b>1,744,354</b>	<b>4,527,069</b>	<b>6,271,423</b>

6.8. This total cost when divided by the number of planned new dwellings in the Zone of Influence means that an average developer contribution of £371.35 is required (These figures will be increased on 1 April each year in line with the Retail Price index (RPI) rounded to the nearest whole pound). This is shown in Table 2.

**Table 2: Housing numbers and cost per dwelling.**

<b>Total number of houses to be delivered within the 12.3km Zone of Influence</b>	
Cornwall	1,200
Plymouth	8,241
South Hams	6,462
West Devon	985
<b>TOTAL</b>	<b>16,888</b>
<b>Cost for managing EMS for the plan period and in perpetuity</b>	
Total cost	£6,271,423
Average cost per dwelling	£371.35

6.9. For Plymouth, in order to calculate the average price per dwelling based on dwelling size, the average household occupancy rates have been taken from 2001 census data which is the most recent data available. This is combined with the proportion of different sized dwellings which were built in Plymouth during the period 2006 - 2015 in order to provide a rate per unit size as shown in Table 3 which also incorporates average occupancy figures from the 2001 Census data.

6.10. Although that figure is the best estimate of the number of planned new homes, the number actually constructed could be different to the estimate. However, the package of mitigation measures in this scheme is 'scalable', which means that the amount of mitigation can be increased or decreased in line with actual housebuilding. This will reflect the case that if housebuilding is accelerated, then

recreational pressures will increase at a faster rate and so will need mitigation faster. Conversely, if housebuilding slows, then recreational pressures will not be so great due to fewer people moving into the area, and so mitigation measures will not be so urgent.

## 7. DEVELOPER CONTRIBUTIONS

- 7.1. As explained in the previous section, the baseline developer contribution is the equivalent of £371 per dwelling (though in practice this will be charged on a sliding scale based upon bedroom numbers per dwelling). These figures will be increased on 1 April each year in line with the Retail Price Index (RPI) rounded to the nearest whole pound.
- 7.2. Immediately following the adoption of the Scheme by a given local authority, the new developer contribution rate will apply to all relevant applications within the 12.3km charging zone, determined after that date within the authority's area. It will also apply to all applications coming in for reserved matters. It is anticipated that all four Cornwall, Plymouth and South West Devon local authorities will have adopted the Scheme by the end of October 2018.
- 7.3. That developer contribution will be required for every net additional dwelling within 12.3 kilometres of the boundaries of the Plymouth Sound and Estuaries EMS Charging Zone (see Figure 2) unless the developer can demonstrate to the satisfaction of the local planning authority and Natural England, it will provide alternative 'bespoke mitigation' which will fully mitigate the recreational impact of the development.
- 7.4. In summary, this applies to:
  - All new applications within the Zone of Influence;
  - All dwellings with outstanding relevant Remaining Matters within the Zone of Influence.
- 7.5. In this context, 'dwelling' includes net new dwellings created through the sub-division of existing dwellings, second homes, dwellings to be used as holiday accommodation, self-contained student accommodation, and new dwellings created as a result of approval granted under the General Permitted Development Order e.g. change of use from office to residential (including houses and flats). It includes permanent accommodation for gypsies and travellers; temporary/transit pitches will be assessed on a case-by-case basis by the local planning authority in consultation with Natural England. It also applies to additional bedspaces arising from demolition and subsequent re-development.
- 7.6. The rate explained in this document or any subsequent revision, will also be applied to variations and reserved matters, even if it was not considered as part of the original planning consent. The reason being that this document and approach described within it now constitutes a material planning consideration and as such will need to be considered.
- 7.7. Some housing schemes, when accounting for their scale or relationship with the PSEEMS, may need to provide bespoke mitigation measures in addition to making the financial contribution in order to ensure effective avoidance/mitigation of impacts on the EMS. A very large scheme could have a disproportionate impact on particular sections of coast compared to the dispersed impact of smaller schemes providing the same overall number of new homes. Similarly, mitigation in addition to the standard developer contribution may be needed for new dwellings which are close to the EMS because the occupants are much more likely to visit the coast with the potential for a greater impact.
- 7.8. Other influencing factors that might be considered in the need for additional mitigation could include (but are not be limited to), existing access to inter-tidal areas, type of frontage - beach, sea wall, adjacent habitats - deep mud or shingle/sand, the height of the site in relation to the inter-tidal level and proposed design of the new scheme. Therefore even very modest housing schemes could have a greater impact, whilst some larger schemes may have less of an impact due to their specific location. The assessment as to whether a particular scheme will require additional mitigation is complex and will depend on a range of factors so it is not possible to say, as part of Scheme, when development will need to provide further measures. The local planning authority, with advice from Natural England, will consider the mitigation requirements for such housing proposals on a case-by-case basis. Developers are encouraged to hold early discussions with Natural England and the local planning authority on the mitigation which will be needed for such schemes.

- 7.9. The need for mitigation for the recreational impact of other types of residential accommodation will be assessed on a case-by-case basis by the local planning authority. The key 'test' is based on the likelihood of the proposed development generating additional recreational visits to the EMS. For example, in respect of residential accommodation designed specifically for elderly people, a developer contribution (or bespoke mitigation) will be required for apartments for the active elderly, but not for secure accommodation such as a residential nursing home for people who are unable to independently leave that accommodation and which does not provide residents parking or allow pets (this would also apply to people living with conditions that limit their mobility). However, mitigation may be required for any staff living on-site. Retirement properties designed for independent living with parking provision and which allow pets will be treated the same as C3 residential properties.
- 7.10. New hotels and other holiday/tourist accommodation - defined as both wholly new establishments and extensions of existing ones - is a residential-related use with the potential to generate additional recreational visits to the SPA(s). The need for mitigation for new hotel accommodation will be assessed on a case-by-case basis by the local planning authority in relation to the 'tests' set out in the paragraph above.
- 7.11. Where mitigation is deemed to be necessary for new hotel and other holiday/tourist accommodation, the mitigation may take the form of a developer contribution calculated on the basis of the number of new bedrooms and the monetary contributions (or a proportion thereof) in paragraph 7.1 above and as shown in Table 3. Such contributions will be pooled and spent on mitigation measures in the same way as developer contributions from new dwellings.
- 7.12. The scope of this scheme is mitigating the recreational impact of new residential related accommodation on the Plymouth Sound and Estuaries EMS. Separate mitigation may be required for other impacts which may arise from new housing, e.g. impacts on water quality, noise disturbance, high buildings obstructing bird flight lines, loss or damage to supporting habitats. Those will be assessed by the local planning authorities, with advice from Natural England, at the planning application stage to identify whether, and if so what, mitigation is required. However, developers are encouraged to hold early discussions with Natural England and the Local Planning Authority.

### A sliding scale of developer contributions

- 7.13. Whilst a flat rate per dwelling has been used as the basis for calculations so far, it should be noted that larger properties can accommodate more people, with the potential for a larger number of visitors to the EMS, creating a higher level of impact so as sliding scale of contributions has been developed to reflect this. This was the approach adopted by the Plymouth Recreational Impacts CIL charge which was levied from 2006 – 2018. This was deemed the fairest way so that the developer contribution varies according to the number of bedrooms in the new property.
- 7.14. So rather than charge a flat rate of £371, the Local Authorities will use a sliding scale of contributions as shown in Table 3 below.

**Table 3: Rates per size dwelling**

Size	Av household occupancy	Cost per unit £
1 Bedroom	1.33	236.62
2 bedroom flat	1.86	330.92
2 bedroom house	2.45	435.89
3 bedroom dwelling	2.63	467.91
4+ bedroom dwelling	2.85	507.05
Cost per head		177.91

- 7.15. These rates will increase each year based on the CPI rate.
- 7.16. In addition, the LPAs reserve the right to charge an additional management cost over and above the amounts identified above.

## 8. IMPLEMENTATION, GOVERNANCE AND REPORTING

### Implementation

- 8.1. The developer contributions are paid to local planning authorities. Each authority decides which legal mechanisms to use to secure the developer contributions from schemes in its area and the potential for phased / staged payments in relation to specific proposals.
- 8.2. The authorities pool the developer contributions received and implement the mitigation measures through the delivery of the Plymouth Sound and Estuaries EMS Recreation Mitigation Partnership (EMSRMP). The contributions received by the authorities are transferred quarterly to the Partnership. This will be set up and overseen by Plymouth City Council who will provide accounting and reporting. Tamar Estuaries Consultative Forum (TECF) will provide the overseeing management of implementation and ensure that
  - The Partnership sets a budget for each year, including the amount to be transferred that year into the in-perpetuity fund. Some money will be held in reserve at all times to cushion against variations in the amount of developer contributions received each quarter: such variations are inevitable due to market-driven fluctuations in the number of sites/development phases on which construction begins. The value of the contributions received by the Partnership each year and details of all expenditure, will be set out in an annual statement of accounts.
  - The developer contributions will need to be received at the time required by each local planning authority and expenditure will need to be profiled accordingly. Expenditure will be set out in the Delivery Plan which will be produced every six years.

### Governance

- 8.3. The implementation of the PSEEMS Recreation Mitigation Plan will be managed through a steering group of officers from each of the local planning authorities and with Natural England. These officers will oversee the financial management of the funding and delivery of the Mitigation Plan. Reports will also be provided to TECF to ensure it integrates with the single management scheme for the Site.

### Reporting

- 8.4. The officer steering group for the PSEEMS Recreation Mitigation Plan will receive two reports each year to seek approval for the proposed budget for the ensuing year, and to seek approval for the Annual Report. Annual Reports will record the progress made in implementing the mitigation measures and summarise the conclusions of completed monitoring. It will also contain a statement of accounts for the preceding year and the budget for the coming year. It will be published immediately after approval by the steering group and will be submitted to Natural England.

### Review

- 8.1. The Scheme seeks to provide mitigation for development planned until 2034. In order to keep the Scheme relevant throughout this period, regular strategic reviews will take place every 5 years from implementation (or more frequently if changes in legislation or evidence necessitate). This will allow for lessons learnt, new best practices and variations over time to be incorporated into the Scheme, making it more relevant for longer. Following each review, an update report will be made available on the website.

## 9. REFERENCES

Charly Griffiths, Matt Arnold & Joseph Butler 2016. *EMS Recreation Study 01: A brief investigation into the possible interaction and sensitivity of priority species and habitats to recreational activity within the Tamar Estuaries Management Plan area.* Marine Biological Association. 2016

Charly Griffiths, Eliane Bastos & Olivia Langmead. 2016 *EMS Recreation Study Document 02. Initial results from the spring season recreational visitor surveys across the Plymouth Sound and Estuaries European Marine Site.* Marine Biological Association. 2016.

Olivia Langmead, Heidi Tillin, Charly Griffiths, Eliane Bastos, Hannah Milburn & Matt Arnold. 2017. *“EMS Recreation Study Document 03. Survey of recreational use within the Plymouth Sound and Estuaries European Marine Site.”* Marine Biological Association. 2017.

Langmead, Tillin, Griffiths, Bastos, Milburn, Butler & Arnold. 2017. *“EMS Recreation Study Document 04. Survey of recreational use within the Plymouth Sound and Estuaries European Marine Site: Scoping report and survey results.”* Marine Biological Association. 2017.

Natural England NECR111. 2013. *A guide to assessing and managing anthropogenic impact on marine angiosperm habitat; Part 1 Literature Review.* Natural England.

Natural England NECR108. 2012. *Identifying best practices in management of activities on Marine Protected Areas.* Natural England.

Natural England. 2015. *Public Access and Disturbance Theme Plan.* Natural England.  
<https://www.gov.uk/government/publications/improvement-programme-for-englands-natura-2000-sites-ipens>

## APPENDIX A: RESOURCE COSTS

CUT FROM EXCEL TABLE v 12

Item Ref	Potential mitigation	Mitigation actions to include:	Delivery requirements	Applies to SAC	Applies to SPA	Occurrence 2018-35	Frequency (over 17 yrs)	£ per mitigation action	Cost over 17 yrs	Occurrence 2035-2115	Frequency (over 80 yrs)	£ per mitigation action	Cost over 80 yrs	%age cost attributed to new dwellings	Total cost attributed to new dwellings
<b>Projects &amp; capital works</b>															
1	Voluntary codes of conduct.	- Zoning of key activities, such as designated speed limits, no-anchor zones, no drone zones, dog on leads.  - Voluntary bag limits / take home limits / move-on rule.	Workshops for consultation - venue hire x 8	Y	Y	Every 8 yrs	3	£800	£2,400						
			Signage			Every 8 yrs	3	£5,000	£15,000						
			Print materials, design, artwork			Every 4 yrs	4	£1,500	£6,000	Every 10 yrs	8	£1,500	£12,000	100	£12,000
2	Provision of adequate litter receptacles.	- Provision of waste receptacles for fishing tackle at popular angling marks / fishing entry points.  - Signage / education relating to hazards of-fishing tackle to environment & possible mitigating actions.	Provision & installation of angling bins	Y	-	Every 10 yrs	2	£5,000	£10,000	Every 10 years	8	£5,000	£40,000	100	£40,000
			On-going waste collection			Yearly	17	£5,000	£85,000						
			Marine Recreation Officer - see below												
			Signage for recreational anglers			Every 10 yrs	2	£5,000	£10,000	Every 10 yrs	8	£5,000	£40,000	100	£40,000
3	Funding of marine litter clean ups.	- Funding of a sub-aqua clean-up of discarded fishing gear by a local dive club.	Dive costs & waste disposal	Y	-	Every 4 years	4	£1,000	£4,000	Every 8 years	10	£1,000	£10,000	100	£10,000
			Equipment			Every 4 years	4	£500	£2,000	Every 8 years	10	£500	£5,000	100	£5,000
4	Awareness raising of sensitive habitats including the development of 'user-scale' maps.	- Signage or encouragement to avoid sensitive habitats or vegetation, directing people away from sensitive areas.  - Signage or	Delivered thru Marine Rec Officer and support for Wembury	Y	Y	Every yr	17	£2,500	£42,500						



	encouragement to enter the water in a defined area, therefore decreasing the overall spatial footprint of impact.	User-scale maps			Twice	2	£6,000	£12,000	Every 20 yrs	4	£6,000	£24,000	100	£24,000
	- Support for Wembury Marine Centre regarding rockpooling impacts -funding education and outreach work													
	- Interpretation at slipways & access points to educate users about sensitivities of overwintering birds feeding close by.	Signage at slipways for boat users			Every 10 yrs	2	£30,000	£60,000	Every 15 yrs	5	£30,000	£150,000	100	£150,000
	- Discourage use of slipways in sensitive areas to avoid months when birds are present.													
	- Development of 'user-scale' maps of sensitive habitats.													
	- Interpretation in key fishing areas.													
5	'Check, Clean, Dry' signage, leaflets, stickers.	Printed materials	Y	-	Every 8 yrs	2	£1,500	£3,000	Every 8 yrs	10	£1,500	£15,000	100	£15,000
	- Provision of Check, Clean, Dry materials to clubs, activity centres, marinas, etc. to raise awareness of NNS & mitigating actions													
6	Educational workshops and roadshows.	Print & display materials			Every 8 years	3	£4,000	£12,000	Every 8 years	10	£4,000	£40,000	100	£40,000
	- Education of slipway owners and operators in repair and cleaning of slipways and correct disposal of material as they are used more intensively.													
	- Educations workshops for marinas, sailing / watersports clubs, etc., regarding CoCs, biosecurity, pollution pathways & prevention guidelines.	Website /Info Portal	Y	Y	Every yr	17	£500	£8,500	Every yr	80	£500	£40,000	100	£40,000
		Workshops - venue hire x 5			Every 10 yrs	2	£500	£1,000	Every 10 yrs	8	£500	£4,000	100	£4,000

7	Reconfiguration of existing moorings if it would remove them from sensitive areas; Installation of eco-moorings or trot moorings.	- Implementation / review of mooring & anchoring strategy.	Marine Recreation Officer/ Project Coordinator	-	-	-	-						
			5 Eco-moorings (starting @ £550 per unit)	Once	1	£5,500	£5,500		-				
		- Reconfiguration of existing moorings, to discourage increasing anchoring and activities.	5 Eco-mooring installation (@£300 per unit)	Once	1	£3,000	£3,000		-				
			Mooring safety checks (@ £300 per unit)	Every yr	16	£3,000	£48,000		-				
		- Replacement of existing moorings/installation of new eco-moorings or trot moorings in / near sensitive areas to discourage increasing anchoring and activities, and limit damage from mooring chains. Self financing at the end of the Plan period.	On-going maintenance	Every 2 yrs	8	£2,000	£16,000		-				
						Total	£82,300	£345,900		Total	£55,500	£380,000	£380,000

**Monitoring**

8	Recreational boat activity survey	- Regular monitoring of the scale, distribution and type of boating activities throughout the SAC/SPA to monitor changes in usage and inform mitigation of impacts from increased recreational use of the SAC/SPA	Volunteer training workshops (venue hire)	Y	Y	Every 8 yrs	2	£500	£1,000	Every 8 yrs	10	£500	£5,000	100	£5,000
9	Recreational usage, activity and impacts survey	- On-going monitoring of the recreational usage of the SAC/SPA, incl. known pressures, such as anchoring / mooring activity, etc., to identify changes in usage and impacts resulting from new/increasing activity to inform required mitigation actions.	Staff time only	Y	Y	Every 8 yrs	0	£0	£0	Every 8 yrs	0	£0	£0	100	£0
10	Recreation impacts monitoring		repeat recreational survey	Y	Y	Every 10 years	2	£35,000	£70,000	Every 10 yrs	8	£35,000	£280,000	100	£280,000

<b>Total</b>	<b>£35,500</b>	<b>£71,000</b>	<b>Total</b>	<b>£35,500</b>	<b>£285,000</b>		<b>£285,000</b>
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**Wardening & project management**

11	Project Coordinator (I Grade FTE0.2, +20% on-costs)	Salary & on-costs	Y	Y	Every yr	17	£10,244	<b>£174,147</b>	Every yr	80	£10,243.92	<b>£819,514</b>	30	<b>£245,854</b>
12	Marine Recreation Officer (Grade F 1 FTE, +20% on-costs for JLP period, and for inperpetuity period.	Salary & on-costs	Y	Y	Every yr	17	£34,542	<b>£587,214</b>	Every yr	80	£34,542.00	#####	100	<b>£2,763,360</b>
13	Summer Marine Recreation Ranger (Grade F FTE 0.5 +20% oncosts)	Salary & on-costs	Y	Y	Every yr	17	£17,271	<b>£293,607</b>						
14	Project running costs	PC, Phones, PPE				17	£666	<b>£11,322</b>		80	£666	<b>£53,280</b>	100	<b>£53,280</b>
		Staff training & support costs				17	£1,300	<b>£22,100</b>		80	£1,300	<b>£104,000</b>	100	<b>£104,000</b>
		Transport: vehicle	Y	Y	Every yr	17	£6,000	<b>£102,000</b>	Every yr	80	£6,000	<b>£480,000</b>	100	<b>£480,000</b>
		Transport: boat 50% of boat costs for 17 years				17	£3,000	<b>£51,000</b>						
		RYA training			Every 5 yrs	3	£1,000	<b>£3,000</b>						

<b>Total</b>	<b>£74,023</b>	<b>£1,244,390</b>
<b>2019 - 2035 Grand Total</b>	<b>£1,661,290</b>	
Contingency @5%	<b>£83,064</b>	
<b>Total incl contingency</b>	<b>£1,744,354</b>	

<b>Total</b>	<b>£52,752</b>	<b>#####</b>	<b>£3,646,494</b>
<b>In Perpetuity Grand Total</b>	<b>£4,311,494.08</b>		
Contingency @5%	<b>£215,574.70</b>		
<b>Total incl contingency</b>	<b>£4,527,068.78</b>		