

# ADEPT

Association of Directors of  
Environment, Economy, Planning & Transport



ASSOCIATION OF  
Local Government Ecologists



Department  
for Environment  
Food & Rural Affairs

## **SURVEY OF LOCAL PLANNING AUTHORITIES AND THEIR ABILITY TO DELIVER BIODIVERSITY NET GAIN IN ENGLAND**

**Do local planning authorities (LPAs) currently have the  
necessary expertise and capacity?**

June 2022

### **REPORT**

Prepared on behalf of the Association of Local Government Ecologists  
by

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## Acknowledgements

This work was funded through a grant provided by Defra and presents the findings of surveys undertaken by ALGE in England during February 2021.

The Project Partners would like to acknowledge the following people for their invaluable inspiration, advice and input into the design of the survey and on the drafting of the report:

Elizabeth Milne	ALGE, ADEPT and Kent County Council
Murray Davidson	ALGE and Hastings Borough Council
Hannah Bartram	ADEPT (Association of Directors of Environment, Economy, Planning & Transport) and East Sussex
David Sutherland	ADEPT and Buckinghamshire County Council
Sally Hayns	Chartered Institute of Ecology and Environmental Management
Tom Pryke	Defra
Adam Stewart	Defra
Rachel Jackson	Defra
Catherine Duggan	Defra
Andrew Richmond	Local Government Association
Julia Coneybeer	Natural England
Garreth Bruff	Planning Advisory Service
Rebecca Moberly	Planning Advisory Service

The following ALGE members provided invaluable insight into the competencies required by a local authority ecologist:

Jonathan Ayres	Stoke-on-Trent City Council
James Baggaley	Cheshire East Council
Don Baker	West Sussex County Council
Tim Burkinshaw	Scarborough Borough Council
Edward Church	South Oxfordshire and the Vale of the White Horse
Catherine Dew	Norfolk County Council
Nicola Farrin	Birmingham City Council
Cody Levine	Worcestershire County Council
David Lowe	Warwickshire County Council
Richard Marsh	Leeds City Council
Amy Reddick	Kirklees Council
Rupert Simms	Charnwood Borough Council
Jane Smith	Dover District Council
Sue Timms	Leicestershire County Council
Eszter Wainwright-Deri	Lewisham Borough Council

ALGE would like to thank Dr Richard Nunes and Amy Burnett from the Department of Real Estate and Planning, Henley Business School, University of Reading. They gave generously of their time and experience to help feed into the design of the survey and ALGE looks forward to continuing to work with both on this topic area.

ALGE would like to acknowledge the special support and input provided by Laura Snell of Burton Reid Associates in Devon. Without Laura, the analysis and presentation of results would have been so much more limited ... and have taken so much longer!

### Citation

#### **This report may be cited as:**

Snell, L. and Oxford, M. (2021) *Survey of LPAs Ability to Deliver Biodiversity Net Gain in England. Do LPAs currently have the necessary expertise and capacity?*

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## S.1 Executive Summary

### Purpose of the Study

The survey was undertaken to identify the level of professional ecological expertise and the various resources required by an English planning authority to:

- prepare for the introduction of mandatory Biodiversity Net Gain (BNG); and then
- implement, deliver, monitor and report on net gain secured through their planning functions.

### Method

The survey was promoted to all English planning authorities and carried out online through Survey Monkey. This provided the opportunity to collect, organise and analyse the results automatically and to present the results in a series of statistics, graphs, charts and tables. Key findings were drawn from the results and are presented in this report along with a series of key recommendations.

### Key findings

#### Geographic coverage, response rates and the role of respondents

- S.1. The survey produced an excellent response from 337 individuals working for 192 local planning authorities (LPAs). This means 57% of all English authorities responded and all forms of local government were represented, including county councils, unitary authorities, district and city councils, London and metropolitan boroughs and national parks.
- S.2. The target audience was also well represented; 45% were planning officers and 37% were ecologists.

#### Current source of ecological expertise

- S.3. Of the local authorities who report having access to ecological expertise circa 55% of these do so through an 'in-house' ecologist, and a further 30% via a Service Level Agreement with another organisation, e.g. County Council or local Wildlife Trust.
- S.4. However, the presence of an in-house ecologist drops to 37% in authorities with only part-time staff (i.e staff working 4 or less days per week). The remaining 63% get their ecological expertise through either: consultants, a shared resource with another LPA, or through a Service Level Agreement (such as with a County Council or local wildlife trust).
- S.5. In the survey conducted by ALGE in 2013, a large majority (81%) of respondents reported that their preferred source would be through a full time 'in-house' ecologist and not through shared, outsourced or part-time expertise. The proportion of current respondents also have this preference.
- S.6. The overall results from the current survey indicate that as many as 26% of LPAs do not have any access to ecological expertise.

#### Current capacity and competence

- S.7. Only 5% of respondents say that their current ecological resource (including in-house and external sources) is adequate to scrutinise all applications that might affect biodiversity. The remaining 95% report that they have no or very limited capacity to ensure most, if not all, applications are assessed by an ecologist.
- S.8. County councils are often comparably better resourced; however, they often provide an ecological service to lower tier district authorities. For instance, one county council respondent explained they have three in-house ecologists, but these serve 12 district councils.

- S.9. There appears to be no correlation between the volume of planning case work and the number of ecologists employed by an LPA.
- S.10. The national survey conducted by ALGE in 2013 established that the vast majority (90%) of planners lack any ecological qualifications and have had very little training on biodiversity issues. They are therefore reliant on other sources of expertise than their own. The results from the current survey suggest this situation hasn't changed since then.
- S.11. Overall, only 25% of all respondents regularly use Natural England's Standing Advice and 27% do so only occasionally. Nearly half state that they do not regularly look at any advice or guidance. Compared to respondents working in an authority with access to some form of ecological resource, respondents with no access report that they rely on their own personal judgement, supplemented by Natural England's Standing Advice.
- S.12. Nearly 70% of planners have no experience, or spend less than a third of their time, on applications that involve BNG. This would suggest that there is a need for considerable skills development within many LPAs.
- S.13. A large proportion of many LPA ecologists' time is not spent on planning casework. Diverting current ecological resources towards BNG would therefore mean that other key work activities would be reduced and would not receive necessary ecological input and expertise; much of this work is actually integral to delivering BNG, such as working with the Local Nature Partnership or Habitat Opportunity Mapping.

#### **Adequacy of ecological information submitted with planning applications**

- S.14. A large proportion of applications do not initially provide adequate ecological information. These are approved only after significant outstanding ecological issues have been addressed, with many requiring pre-commencement conditions to secure necessary information and/or further mitigation. Such applications may be subject to substantial delays and/or increased costs – or worst case, may be refused planning permission.

#### **Understanding and experience of BNG and LNRS proposals**

- S.15. Only a very small proportion of respondents said that they have not heard of BNG, and the majority reported that they have a broad understanding of what is proposed with regard to it becoming mandatory. Far fewer respondents are familiar with Local Nature Recovery Strategies.
- S.16. Over half of respondents reported that they currently have no Local Plan policies relating to BNG. However, of these, 75% report that work to prepare such policies is underway.
- S.17. Since BNG is currently not mandatory, only a minority of LPAs have started to develop any expertise in this area of work, and the majority of those working in the planning system currently have very little, if any, regular experience of securing BNG through planning applications. This will have significant implications for how both capacity and capability can be developed within the planning system. This highlights the need for the provision of high quality, consistent training to be made available to relevant LPA staff.
- S.18. There is no clear mandate from the results to indicate which organisation is best placed to lead on the development of Local Nature Recovery Strategies; 36% say it should be the Local Nature Partnership, 27% say it should be their own authority, and 25% think it should be a higher tier authority (e.g. either a County Council or Unitary Authority).

#### **High importance attached to robust legal agreements**

- S.19. 75% of respondents believe that robust legal agreements (or covenants) will be 'essential' for the delivery of BNG and 15% believe they will be 'very important'.

### Access to ecological data to inform BNG

S.20. The majority of LPAs are well placed to obtain relevant baseline habitat and species data from their Local Record Centre. For instance, 66% have a Service Level Agreement (SLA) to access all data sets and further 16% have access to some data sets e.g. local wildlife sites. Over 80% indicated that access to baseline habitat and species data will be very important to inform their planning.

### Preferred options for securing land for BNG

S.21. Respondents would prefer to secure land for BNG that is either in local authority ownership or under the control of the Local Nature Partnership. Identifying suitable BNG land using a similar approach as the Strategic Housing Land Availability Assessment was also considered preferable. National and local commercial BNG operators that are independent to the Council were the least preferred option.

### Need for increased capacity and resources

S.22. Fewer than 10% of respondents reported that their current expertise and resources will be adequate to deliver BNG, while 85% state they will require additional professional staff to support their new responsibilities. A quarter of respondents believe they would only be able to address an increased BNG workload if other council activities that also require ecological input are reduced or additional resources are forthcoming.

S.23. One of the key findings from the survey is that **the majority of respondents report that their current resource, capacity and expertise is not adequate to deal with their existing planning workload, let alone any increase required to address additional work on BNG.**

S.24. Defra has identified three phases or workstreams for the delivery of BNG: (i) Transition & Preparation, (ii) Implementation, and (iii) Monitoring and Reporting.

S.25. The Table below provides an overall summary of the additional resources required for each of the three workstreams. This shows the estimated additional staff resource required matched to the proportion (%) of respondents that gave each response. In excess of 60% of respondents believe that they will need at least 1 or more FTE to meet demands for each of the three work streams.

### Summary of Overall Additional Resources Required During Each Workstream for BNG

Workstreams for BNG Rollout	Current Resource Adequate	Additional Staff Resource Required <i>Expressed as Full-time Equivalents</i>			
		<0.5 FTE	0.5 FTE	1.0 FTE	2+ FTE
Transition and Preparation	3%	4%	19%	33%	41%
Implementation	4%	4%	15%	30%	50%
Monitoring and Reporting	3%	9%	23%	35%	34%

### A Corporate Multi-Disciplinary Responsibility

S.26. The results show that delivery of BNG must be tackled as a multi-disciplinary corporate endeavour on the part of LPAs, drawing upon - as a minimum - ecological, planning, property, legal, project, partnership and land management expertise.

### Coordination by an Experienced Environmental Planner

S.27. Coordination of the multi-disciplinary nature of BNG might be best achieved within an LPA through such a post as an environmental planner who has oversight of the overall process and elements of BNG delivery, monitoring and reporting. This could also include coordination with wider related

environmental initiatives, such as nature-based solutions, climate mitigation, greenspace management, flood resilience and people's access to nature.

### **Training requirements for BNG**

- S.28. A large proportion of respondents do not have more than a basic knowledge of most areas of work that will be required to roll out BNG. This overall limited experience applies to:
- Basic understanding of BNG requirements
  - Use of the biodiversity metric
  - Identifying local BNG receptor sites (habitat opportunity mapping)
  - How to interpret the robustness of ecological reports and BNG proposals
  - Identifying and using planning/legal mechanisms to secure BNG
  - Negotiating with applicants over inadequate proposals
  - Negotiating with landowners over site provision.
- S.29. There is a clear need for provision of relevant training, and that this needs to be targeted carefully to ensure it covers both the breadth of activities and the diverse disciplines of staff involved.

### **Priorities for government support and guidance**

- S.30. Half of the respondents stated that additional funding would be a priority for them. A third would like to see clear guidance on the BNG process, while a quarter wished to see guidance on issues around practical delivery, such as:
- Effective information systems
  - Local Nature Recovery Strategies
  - Habitat registers
  - Trading platforms
  - BNG monitoring
  - Enforcement
- S.31. Following consultation with its members, ALGE recommends as part of the Department for Levelling Up, Housing and Communities' (DLUHC) proposed Planning Reforms, that BNG be introduced as part of *National Validation Requirements*, thereby enabling LPAs to invalidate planning applications where an applicant has clearly not provided adequate BNG.

### **Perceived risks to the effective introduction of BNG**

- S.32. Respondents identified the following as being either 'high' or 'very high' risks to implementation.
- |   |       |
|---|-------|
| ▪ Inadequate resources during the transition and preparation period | (76%) |
| ▪ Future budgetary cuts   | (72%) |
| ▪ Lack of available land for BNG                                    | (62%) |
| ▪ Lack of ecological expertise                                      | (60%) |
| ▪ Difficulty in recruiting new staff                                | (56%) |
| ▪ BNG monies used to support other LPA priorities                   | (53%) |
| ▪ Delivery of BNG projects outside of the LPA area                  | (53%) |
| ▪ Lack of enforcement staff   | (38%) |
| ▪ Lack of appropriate training                                      | (38%) |
| ▪ Inadequate habitat opportunity mapping                            | (29%) |
| ▪ Lack of planning capacity and expertise                           | (24%) |
| ▪ Lack of legal expertise   | (24%) |

### **Risks may also increase in areas where new development is highest.**

- S.33. The results indicate that a 'one size fits all' response to the need for additional resources would not necessarily be most cost effective. There may be benefit in undertaking further analysis to match additional resources to some of the key variables, such as: the level of new development planned for an authority's area, since greater area (in hectares) of development might correlate with a greater need in the amount of BNG units to be delivered.



- S.34. The likely volume of planning case work may therefore be an important factor when considering the allocation of additional resources, while also recognising the variation that exists between LPAs and their current state of readiness to introduce BNG. However, in deciding on where to target resources, it must also be recognised that the government may wish to address other socio-economic variables, such as disparities between different English regions.
- S.35. **Adequate time to prepare.** Local authorities will require not only additional resources, but also early notification of the actions that need to be taken and the new processes and mechanisms that need to be introduced into their planning functions. Local authorities will also need an adequate lead in time to ensure they are able to recruit new staff to support the new work streams.

## Summary - Recommendations

### Identify clear responsibilities as soon as possible

- R.1. Local authorities should be given very clear direction over their new responsibilities for BNG and for their role in the preparation of Local Nature Recovery Strategies.
- R.2. BNG should be delivered and coordinated as part of the wider process of green recovery, nature-based solutions, greenspace management, flood resilience and making nature more accessible to a larger proportion of the population. An environmental planner might be well suited to this overarching role.
- R.3. BNG should be promoted to local authorities as a council-wide, multi-disciplinary endeavour that involves staff from different departments.

### Implementation of BNG should be adequately resourced

- R.4. Preparation for - and implementation of - BNG should be adequately resourced, meaning:
- i. an increase in **capacity** (an increase in necessary staff); and
  - ii. development of **expertise** (through appropriate training and guidance).
- R.5. Additional and appropriate resources should therefore be made available to LPAs to bridge the gap between the existing situation and what will be required to roll out BNG effectively when it becomes a mandatory requirement. This should be considered in the context of the LPA BNG competency profile (see Section 6).
- R.6. Local authorities should be discouraged, in the strongest means possible, from redirecting monies secured for BNG towards other council priorities or funding gaps which are not related to BNG.
- R.7. BNG should be introduced into the work of LPAs without the risk that resources will then no longer be available to support other local authority initiatives and projects that also require ecological expertise, such as LNRs, greenspace management and design input into Council projects.

### Incorporate good biodiversity practice into planning reforms

- R.8. Make explicit how BNG is expected to operate within the context of planning reforms.
- R.9. Additional resources should be sufficient to ensure there is adequate expert ecological scrutiny of planning applications to determine and ensure that proposed gains are proportionate to the predicted losses (impacts).
- R.10. Defra and DLUHC should consider how the new short *Checklist for Ecological Impact Assessments* (EclAs), that has been prepared by the ALGE and the CIEEM, might be used as part of a BNG quality assurance process and also potentially in the Validation Process (see R14 below).
- R.11. Since the Environment Bill proposes that all relevant planning applications must submit a BNG plan, DLUHC should consider the introduction of a specific requirement in the list of *National*

*Validation Requirements* that relates to the provision of a BNG plan with all relevant planning applications. This would enable planning authorities to invalidate applications without such a plan.

### **Provide tailored training and guidance on BNG**

- R.12. Training should be prioritised towards those areas that will be of most benefit to the widest group of professionals, such as:
- Interpreting and assessing BNG proposals
  - Negotiating with applicants to secure adequate gains (e.g. 10% or more)
  - Negotiating with landowners and third parties to secure the appropriate sites for BNG delivery which are of best ecological value (e.g. identified through the LNRS)
  - Identifying and securing land for BNG
  - Securing net gain through planning and legal services
- R.13. Both the ALGE survey in 2013, and the results collected in this survey, indicate that there have been poor levels of uptake by planners currently of Natural England's Standing Advice. This would suggest that any new national planning guidance for LPAs on BNG should be prepared carefully so that it is fit for the intended audience and the uses to which it will be put.
- R.14. Appropriate and proportionate training and guidance should also be made available for professionals involved in the design and preparation of new developments and planning applications – as might be provided/commissioned by professional and industry bodies involved with planning, design and development.
- R.15. Guidance and training should be prepared nationally to demonstrate when and how enforcement action should be taken in relation to BNG projects i.e. what circumstances would warrant enforcement intervention and what intervention would be appropriate.

### **Share good existing practice**

- R.16. Guidance should make it clear that there will be different 'models' by which local authorities can deliver net gain, and different models will suit some authorities more than others, depending on their local circumstances. No one size 'approach' will fit all.
- R.17. Close collaboration should continue between the partners in this project and the Planning Advisory Service (PAS), where the latter is exploring training requirements for LPAs associated with needs arising out of the Environment Bill, and how such training may be delivered.
- R.18. Local authorities that are more advanced in their preparations for BNG should be encouraged to share good practice to assist those that are at the start of the process. Case studies showing the journey taken by different authorities may be a particularly useful. And all authorities should also be encouraged to collaborate and share experiences; to discuss sharing or pooling resources; identifying/securing target sites for BNG.
- R.19. To address widespread uncertainty, information should be made available to all LPAs as soon as possible to inform them about the government's proposals for BNG and the implications that these will have for each council. This will enable LPAs to identify what they need to do to ensure they are ready and resourced for the introduction of BNG.

# 1. INTRODUCTION

## 1.1 Purpose of this report

- 1.1.1 This report sets out the results and findings from a survey of English local planning authorities (LPAs) conducted in February 2021. In addition, reference is made to the results of a similar survey undertaken by ALGE in 2013<sup>1</sup>, to highlight changes, if any, that have occurred between then and now. The results of this earlier survey is available on the ALGE web site at: <https://www.alge.org.uk/publications-and-reports/>
- 1.1.2 The survey in 2021 was undertaken to identify the level of professional ecological expertise and the various resources required by an English planning authority to:
- prepare for the introduction of mandatory Biodiversity Net Gain (BNG), and then
  - implement, deliver, monitor and report on net gain secured through their planning functions.
- 1.1.3 Responses are presented from LPA staff who will be at the forefront of both the introduction and implementation of BNG, particularly local authority planners and ecologists who will be key to the successful delivery of BNG.
- 1.1.4 This report provides an indication of current levels of expertise and capacity (the baseline) among local councils and then identifies the additional skills and capabilities required to deliver BNG through the planning system. The survey has been prepared as a partnership project between the:
- Association of Local Government Ecologists (ALGE)
  - Association of Directors of Environment, Economy, Planning & Transport (ADEPT)
  - Department for Environment, Food and Rural Affairs (Defra)
- 1.1.5 All three bodies recognise that the introduction of new mandatory requirements is likely to place new burdens on local authorities. This will be both in terms of capacity to deal with the expected increase in workload as well as professional expertise necessary to address the additional technical, planning and legal issues involved in preparing for and then implementing the new measures.
- 1.1.6 The results of the 2021 survey will provide an important and timely contribution to the evidence base as the government looks to test its assumptions on new burdens arising from the Environment Bill. As such, the findings will be relevant to development of the government policy on resourcing the introduction and implementation of BNG. It will also be of use to local government to help them better understand and consider what they need in terms of both the skills and resources to develop and deliver BNG through their local planning and development management functions.

## 1.2 Context

### The Environment Act

- 1.2.1 Following the UK's departure from the EU on 31 January 2020, the government is preparing to produce and implement its own set of domestic primary and secondary environmental legislation. This starts with the Environment Act (November 2021) and presents the government's blueprint for environmental reform post EU exit. It introduces a new legal framework in respect of air pollution, water quality, and nature conservation and will be followed by statutory regulations providing further detailed requirements.
- 1.2.2 The Act establishes a new framework for environmental governance and is intended to meet the ambitions of the government's 25 Year Environment Plan, where the latter sets out a

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<sup>1</sup> ALGE (2013) *Ecological Capacity and Competence in English Planning Authorities. What is Needed to Deliver Statutory Obligations for Biodiversity?* Report published by the Association of Local Government Ecologists.

comprehensive and long-term approach to protecting and enhancing our natural landscapes and habitats in England for the next generation.

### **New general duty to ‘enhance’ biodiversity**

- 1.2.3 The Environment Act (S.102) sets out a general duty to ‘enhance’ biodiversity in England and Wales, thereby updating the Natural Environment and Rural Communities Act 2006. This duty will need to be evidenced by public bodies through published reports. Consequently, LPAs will need to place greater emphasis on environmental considerations when determining planning applications. This will represent a marked change from the current situation where the National Planning Policy Framework (NPPF:2019), only states that local planning policies and decisions ‘*should*’ enhance the environment in terms of reducing adverse implications and provide net gains for biodiversity. In future, this will be a mandatory requirement.

### **Mitigation hierarchy**

- 1.2.4 LPAs will still need to apply the mitigation hierarchy to all developments and should favour projects that do not necessitate mitigation (i.e. they avoid impacts) as these should not undermine biodiversity. Projects that include on and off-site mitigation proposals will then be preferred, with compensation measures considered as a last resort.

### **Mandatory biodiversity net gain**

- 1.2.5 The Environment Act (S.98) introduces a mandatory requirement for BNG to be provided as a part of development. This will become a condition of planning permission in England. Planning permission would therefore be granted on condition that the objective of biodiversity gain is fulfilled<sup>2</sup>. The Act sets out that the BNG of any development would have to exceed the pre-development value by 10% (as measured by a biodiversity metric published by Defra). This mandatory requirement will be achieved through an amendment to the Town and Country Planning Act 1990 as well as via the introduction of new secondary legislation.
- 1.2.6 On-site BNG delivery (i.e. within the development redline boundary) is preferred and is incentivised through the biodiversity metric. This helps keep the benefit of net gain close to where the impacts are occurring and to the local community. Where this is not achievable, local offsite net gain is then preferred, which can be provided through bespoke sites secured by the developer, or through strategic sites within the local authority area. For the latter, it is envisaged that local authorities will work with local landowners to establish localised habitat compensation schemes.
- 1.2.7 In the event that developers are unable to secure necessary on or off-site biodiversity gains, they will be required to purchase biodiversity credits from government which will fund large landscape-scale projects across the country. A combination of the above can be used where necessary.

### **Local Nature Recovery Strategies**

- 1.2.8 The Environment Act (S.104-108) also requires the creation of Local Nature Recovery Strategies (LNRSs), a new system of spatial strategies for nature throughout England. LNRSs are designed as tools to drive more coordinated, practical, and focussed action to help nature and encourage the use of nature-based solutions to address wider environmental problems. Each Strategy will, for the area that it covers:
- agree priorities for nature’s recovery
  - map the most valuable existing areas for nature
  - map specific proposals for creating or improving habitat for nature and wider environmental goals.

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<sup>2</sup> At the time of writing this report, it is proposed that such a condition for BNG may be met at the time planning permission is granted, whereby the LPA will simultaneously approve a biodiversity gain plan submitted by the applicant. Alternatively, an applicant may be able to submit the requisite information after consent; in this respect planning permission would depend on approval of this information by the LPA through a mechanism similar to a pre-commencement planning condition.

- 1.2.9 The production of each LNRS will be evidence-based, locally led, and collaborative, with the intention of creating a shared plan that public, private, and voluntary sectors can all help to deliver. It is expected that there will be roughly 50 LNRSs which together will cover the whole of England with no gaps and no overlaps. Precise boundaries will be established by the Defra Secretary of State on a case-by-case basis. It is anticipated that in many cases there will be one LNRS per county (or equivalent) but this will not be the approach in all areas. The Defra Secretary of State will also appoint a “responsible authority” to lead production of each.
- 1.2.10 LNRSs will help target the delivery of BNG to where it will have most benefit, provide a focus to a strengthened duty on all public authorities to conserve and enhance biodiversity, and support the conservation and enhancement of biodiversity through the planning process. LNRSs will also provide a mechanism for targeting funding to encourage and reward more environmental land management, such as tree planting and peatland restoration.

### **1.3 Aims and objectives of this project**

- 1.3.1 The overall aim of this piece of work is to generate a better understanding of both the current capacity and competencies required to deliver mandatory BNG and to identify what, if any, additional resources may be necessary to ensure effective delivery.
- 1.3.2 The survey aims to address two key questions:
- i. What are the existing levels of expertise and capacity (among English planning authorities) that are relevant to the preparation for and implementation of BNG in England?
  - ii. What are the likely additional skills, capabilities, and resources required to deliver BNG effectively through the planning system?
- 1.3.3 In addition to the above online survey, the project had two further objectives. These are to prepare:
- iii. A BNG competency profile for local authorities.
  - iv. A capacity framework to demonstrate various means by which LPAs can access ecological expertise and deliver BNG.

## **2. METHODS**

### **2.1 Online survey of LPA planners and ecologists**

- 2.1.1 During December 2020 and January 2021 officers from ALGE, ADEPT and Defra (see acknowledgements) prepared a questionnaire for circulation within the online survey tool Survey Monkey. The survey was circulated to English local planning authorities via ALGE’s membership listings as well as through a variety of other planning networks, organisations and contacts.
- 2.1.2 Survey Monkey was used to automatically collect, organise and analyse the responses and present the results in a series of statistics, graphs, charts and tables.
- 2.1.3 Further analysis and interpretation of this report has been undertaken, making use of the online filter tools available in Survey Monkey. These filters enabled the results to be interrogated by setting various parameters and conditions to include or exclude specific responses or situations. For example, the filters enabled the results to be interrogated to establish whether answers from respondents differed depending on the type of authority they work for (e.g. County or District) OR whether or not they currently seek to secure BNG through their existing planning policies and decisions OR whether the individual responding was a planner, an ecologist or other.
- 2.1.4 Where it has been useful to do so, reference has been made to the survey of local authorities undertaken by ALGE in 2013. On some issues, this comparison provides an opportunity to identify what, if any, changes have occurred over the intervening period.

## 2.2 Presentation of results

- 2.2.1 The bar charts and pie diagrams incorporated into Section 3 of this report have been extracted directly from the results in Survey Monkey. Where further analysis has generated additional figures, these are explained in the text.
- 2.2.2 Many of the numerical results generated by Survey Monkey are expressed as a percentage of the total number of respondents to a question (provided to two decimal points). For the purpose of presenting results, this report expresses all percentages rounded up to the nearest whole number.

## 2.3 Assumptions

- 2.3.1 Some individuals taking part in the survey did not answer all questions. While there are obviously a number of reasons why they may have chosen not to answer, for some questions it is not unreasonable to assume that they had no knowledge of the subject matter (many questions deliberately omitted a 'don't know' option). On this basis, the authors have included the number of nil responses as part of the analysis, and any assumptions have been made clear in the text.

## 2.4 Using the CIEEM Competency Framework

- 2.4.1 Work to prepare a competency profile for local authorities (see Sections 6 and 7) is based upon the Chartered Institute of Ecology and Environmental Management's (CIEEM) Competency Framework. (December 2019)<sup>3</sup>
- 2.4.2 The CIEEM Competency Framework defines 14 competence themes (see **Table 1**) subdivided into technical themes related to ecology and environmental management, and those associated with more general transferable skills.

**Table 1. CIEEM Professional competency themes**

Technical themes	Transferable themes
Environmental assessment	Professional conduct
Education, knowledge exchange	Health and safety
Environmental management	Communication
Policy, legislation and standards	Facilitation, consultation, engagement and partnering
Surveying	Information management
Scientific method	Organisational management
	Project management
	People management

- 2.4.3 The CIEEM Competency Framework also defines four levels of competence: Basic, Capable, Accomplished and Authoritative. In summary these are:

**Basic:** *Has a basic knowledge, with a simple understanding of terminology and concepts. Has some experience of practical application and would be able to carry out standard activities, under supervision.*

**Capable:** *Has the knowledge and experience essential to carry out standard activities unsupervised confidently and consistently. Is likely to need to seek advice before carrying out complex or non-standard activities.*

<sup>3</sup> Available at <http://www.cieem.net/competency-framework>

**Accomplished:** Has the knowledge and experience of this activity to carry out complex, specialist or non-standard tasks confidently and consistently. Is aware of alternative options and approaches and can provide guidance, instruction, and advice to others on this activity.

**Authoritative:** Is widely recognised as an authority, both by others within the organisation and/or by external peers for the knowledge and experience they demonstrate in relation to this activity.

## 2.5 Opportunity for further analysis of survey results in the future

2.5.1 Due to the high response rate, the large volume of information collected during the survey and fixed costs and timescale for the work, it has not been possible to undertake detailed areas of enquiry that lie outside the original scope for the project. However, project partners (notably, Defra, Natural England and the Planning Advisory Service) have indicated that they may wish to carry out further analysis of the results to inform other related pieces of work. For this purpose, ALGE will be able to provide access to the whole survey data set and will liaise with partners to decide a suitable format for data sharing.

## 2.6 Preparation of an LPA BNG competency profile and a capacity framework

2.6.1 In addition to the online survey, this project has also sought to develop:

- a) An LPA **BNG Competency Profile**. This sets out the necessary technical and professional expertise that is likely to be required by a local authority as it prepares for and then implements mandatory biodiversity net gain.

The BNG competency profile has been prepared based on:

- the CIEEM professional competency framework (for ecology and environmental management)
- the results relating to relevant competencies in the ALGE survey undertaken in 2013<sup>4</sup>
- the responses from a membership-wide consultation with ALGE members
- the authors' extensive experience of working on biodiversity issues within the planning system as well as with wider local authority functions.

- b) a local authority **BNG Capacity Framework**. This identifies the functions, structures and resources that are likely to be required by a local authority when it begins to prepare for and then implement mandatory biodiversity net gain.

The capacity framework has been prepared based on:

- the results relating to relevant capacity, mechanisms and delivery models drawn from the ALGE survey undertaken in 2013 as well as this survey undertaken in 2021
- direct input from ALGE members during the 2021 survey period
- the authors' extensive experience of working on biodiversity issues within the planning system as well as with wider local authority functions.

2.6.2 The profile and framework also consider how this expertise may further support other aspects of the Environment Act, such as Local Nature Recovery Strategies.

2.6.3 The competency profile and capacity framework will be published separately as stand-alone documents to this main report and will be used by the project partners to inform and shape further policy development and resources required to support the introduction of BNG.

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<sup>4</sup> ALGE (2013) Ecological Capacity and Competence in English Planning Authorities. What is Needed to Deliver Statutory Obligations for Biodiversity?

### 3. RESULTS AND KEY FINDINGS

#### Q1 – Number of English LPAs responding to the survey

The Local Government Association (LGA)<sup>5</sup> records 339 local authorities in England, of which 25 are county councils, 188 are district councils, and 126 are single-tier authorities. Of the latter, 33 are London boroughs and 36 are metropolitan boroughs. There are also an additional ten National Park Authorities.

Individuals from **192** different LPAs in England took part in the survey. A response was therefore received from over half the total number of English LPAs (**57%**). The geographical distribution of all types of LPAs that took part in the survey is shown in **Map 1**. While the map provides an indication of the authorities that took part in the survey, the result from individual authorities remains anonymous.

The distribution of County Councils and National Parks that responded to the survey are shown in **Map 2** (see **Appendix 1**) and District, Unitary, Metropolitan and London Borough Authorities that responded are shown in **Map 3** (see **Appendix 1**).

As can be seen from Map 1, there was an excellent response to the survey from across the whole of England, with very few areas not being covered by at least one tier of local government. This compares very favourably with the online survey conducted by ALGE in 2013<sup>6</sup>, when only 20% of English LPAs responded.

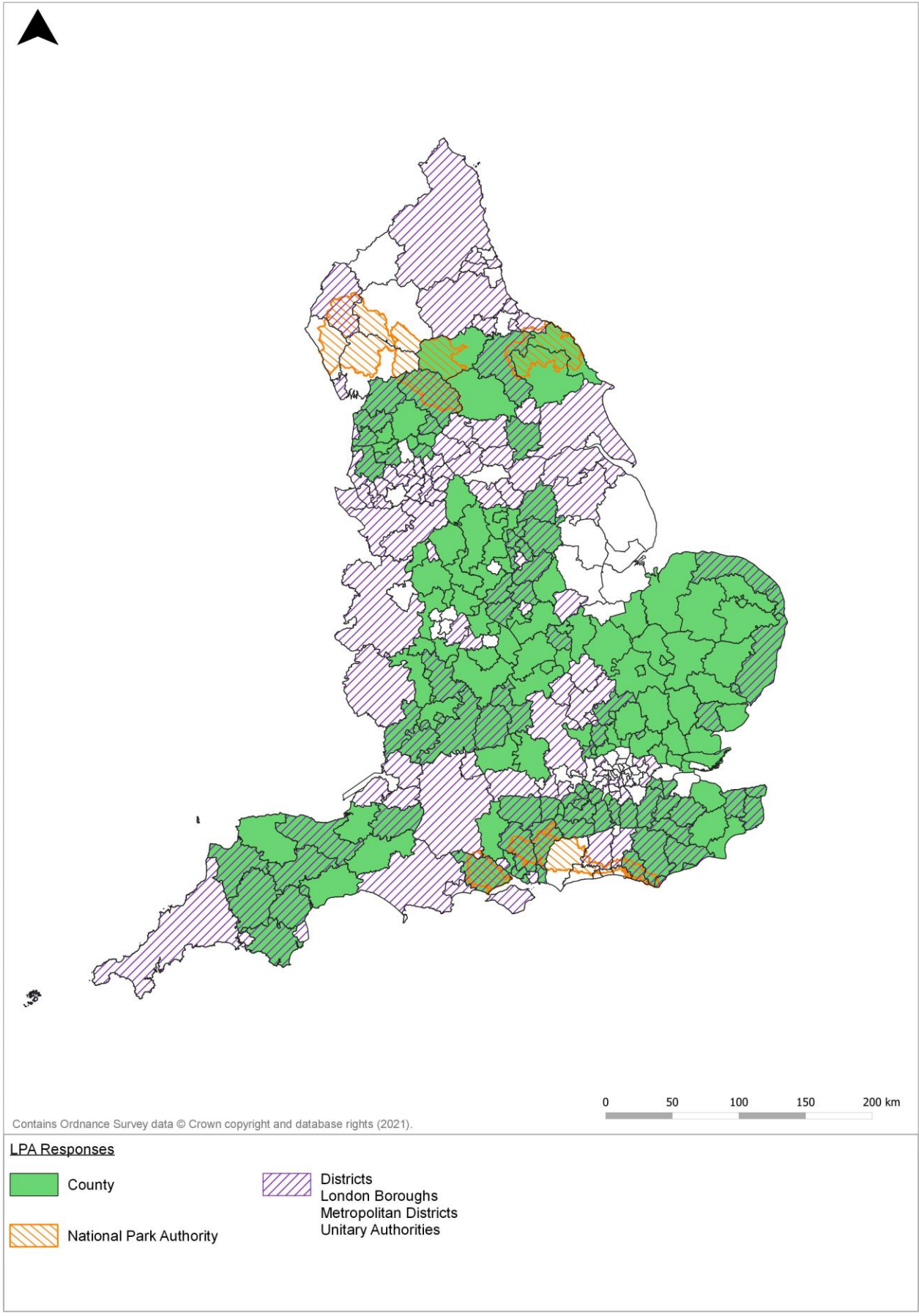
Based on the number of individual authorities, and the types of authority and their geographic spread, it can be reasonably assumed that the findings of the survey are reflective of the current state of readiness of England's LPAs to implement BNG.

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<sup>5</sup> <https://www.local.gov.uk/about/what-local-government>

<sup>6</sup> ALGE (2013) Ecological Capacity and Competence in English Planning Authorities. What is Needed to Deliver Statutory Obligations for Biodiversity?





**Map 1. Geographic location and coverage of all responding LPAs**

## Q2 – What is your role within your LPA?

A total of **337 responses** were received from individuals working within **192 LPAs** across England. The majority of respondents were Planning Professionals (45%) followed by Ecologists/Biodiversity Officers (37%), Other (20%) and Landscape Officers (3%) (see **Figure 2**).

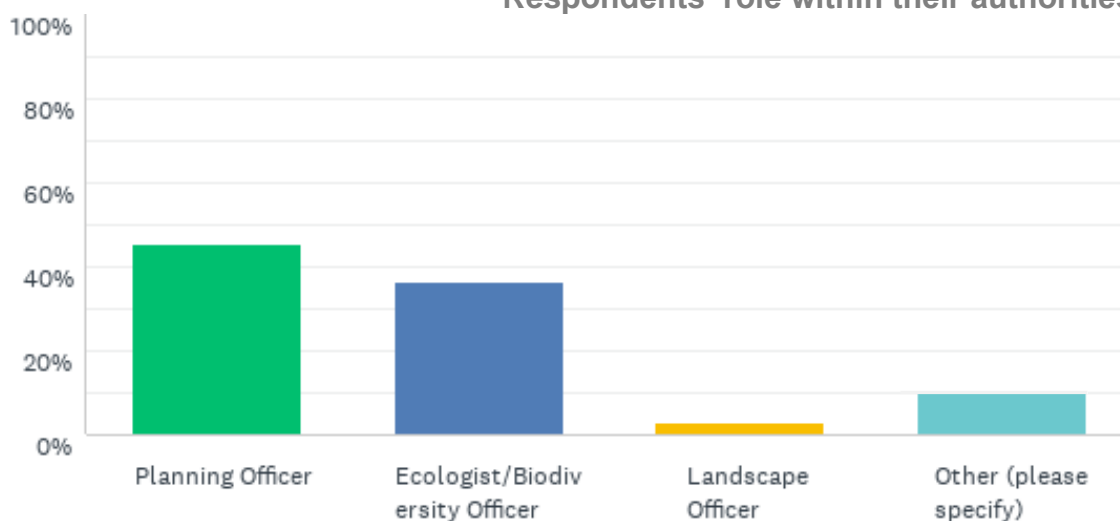
The responses that were in the 'Other' category included:

- 5 individuals that were responsible for wider sustainability issues (including climate change)
- 5 individuals that were responsible for greenspace or countryside management
- 2 consultant ecologists providing services to LPAs
- 1 individual from a wildlife trust providing ecological advice to 10 districts under a Service Level Agreement
- 1 individual from a local environmental record centre
- 1 architect
- 1 planning enforcement officer
- 1 arboricultural officer

All but three of the respondents therefore identified with the target audience for the survey and are therefore believed to be well qualified and/or experienced to respond.

NOTE: Only three responses in the 'Other' category have been identified as invalid because the responses cannot be considered as relevant or accurate. These included a student nurse and an environment officer from County Louth in the Republic of Ireland.

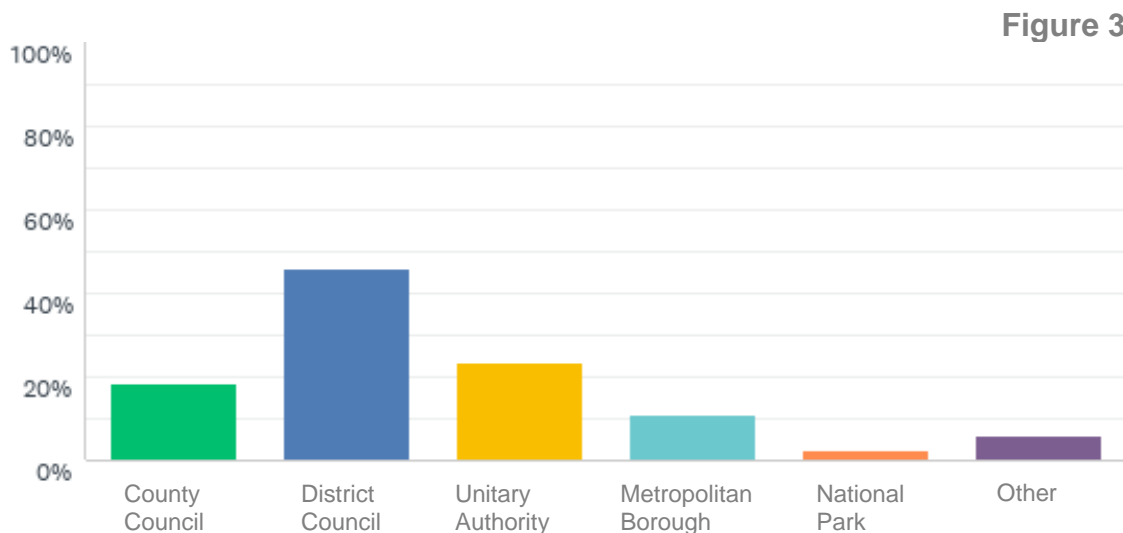
**Figure 2**  
Respondents' role within their authorities



### Q3 – What type of LPA do you work for?

A total of 337 individuals answered this question.

Most respondents work for District Councils (46%) followed by those who work for a Unitary Authority (24%). The remainder work for County Councils (19%), Metropolitan or London Boroughs (11%) and National Parks (3%). Respondents that chose 'Other' as their employer (6%) included ecological consultants, a wildlife trust, and those providing ecological expertise for more than one local planning authority (e.g. shared between two or more LPAs, such as with Combined Authorities).



### Q4 – How does your authority currently access ecological expertise?

A total of 277 individuals answered this question and 60 (18%) gave no response.

Over half of these (59%) currently use an in-house ecologist to access ecological expertise. 25% of respondents stated that their LPA was signed up to a Service Level Agreement (such as with a local wildlife trust or their County Council). Ecological expertise is obtained from commercially procured Consultants according to only 13% of the respondents. A small percentage of respondents (7%) share their ecological expertise with another LPA (see **Figure 4a**).

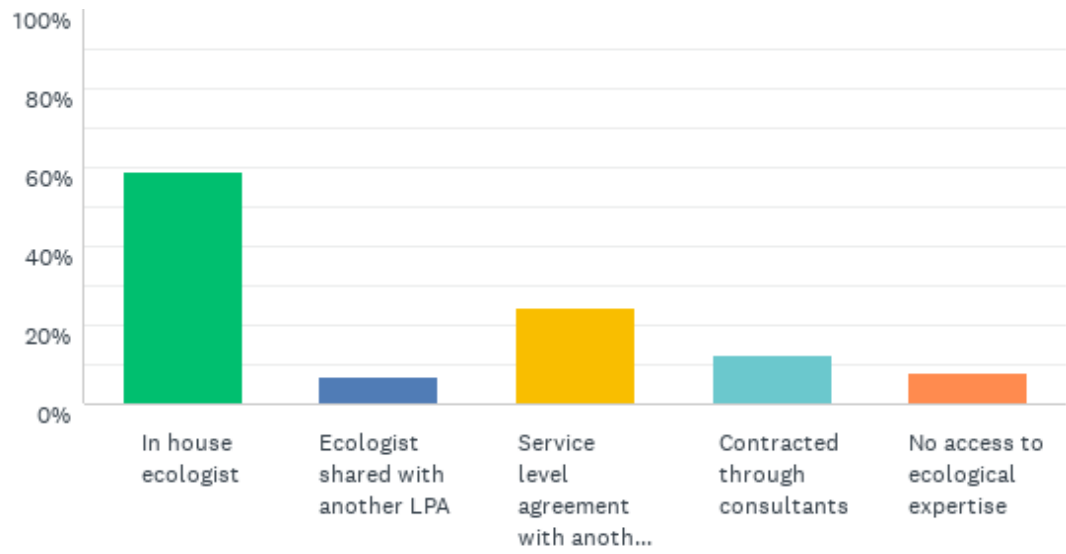
While only 8% of respondents reported that they do not currently have any access to specialist ecological advice, 61 individuals did not respond to this question. If we assume that these respondents should know if they have access to ecological expertise, it is not unreasonable to conclude that the total number of respondents without current access is more likely to be higher and nearer to **26%**.

In the 2013 survey of LPAs undertaken by ALGE<sup>7</sup>, approximately one third (i.e. 33%) of LPAs reported that they did not have access to ecological expertise. The latest results would therefore suggest, over the intervening period, that a larger proportion of English LPAs now have at least some form of ecological resource available to them. However, this apparent improvement should be considered in the context of the current capacity available (See **Question 5**), where over half of LPAs only have access to 0.5 or less FTE ecologists.

Furthermore, only 35% of LPAs that have part-time access to specialist ecological advice do so through their own in-house ecologist. A larger proportion (60%) of LPAs with access 0.5 FTE or less expertise, do so through another means i.e. shared with another LPA, or through a service level agreement with a higher tier authority or through consultants.

<sup>7</sup> ALGE (2013) Ecological Capacity and Competence in English Planning Authorities. What is Needed to Deliver Statutory Obligations for Biodiversity?

**Figure 4a**  
**Current source of ecological expertise**  
(Results from those answering this question)



## Q5 – What is your authority’s current ecological capacity?

A total of 281 responses were received to this question and 56 (17%) gave no response.

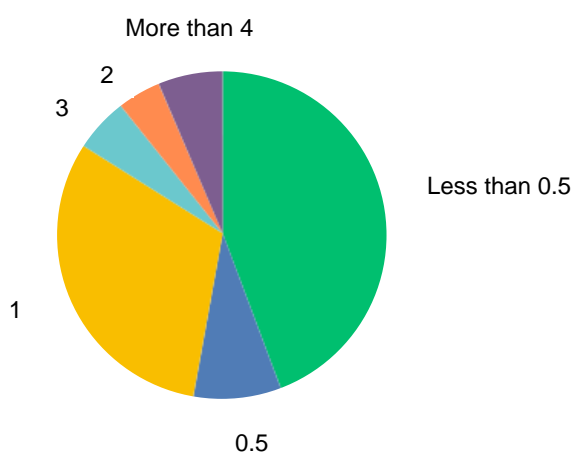
The results show that for over half of the respondents (53%), their LPA has access to 0.5 or less FTE ecologists for planning work. Nearly a third (31%) of respondents state that their LPA has access to one FTE ecological post, and 16% report that they have access to two or more FTE ecologists (see **Figure 5**).

The results from the 2021 survey would seem to indicate that the proportion of LPA ecologists that are employed part-time has increased slightly since ALGE undertook the 2013 survey<sup>8</sup>.

*Expressed as full time equivalent (FTE) ecologists available for planning work*

	2013	2021
<b>% with 0.5 or less FTE</b>	<b>26%</b>	<b>31%</b>

**Figure 5 Current Ecological Capacity**



## Q6 – Are current ecological resources adequate for current workload?

A total of 285 responses were received for this question and 52 (15%) gave no answer.

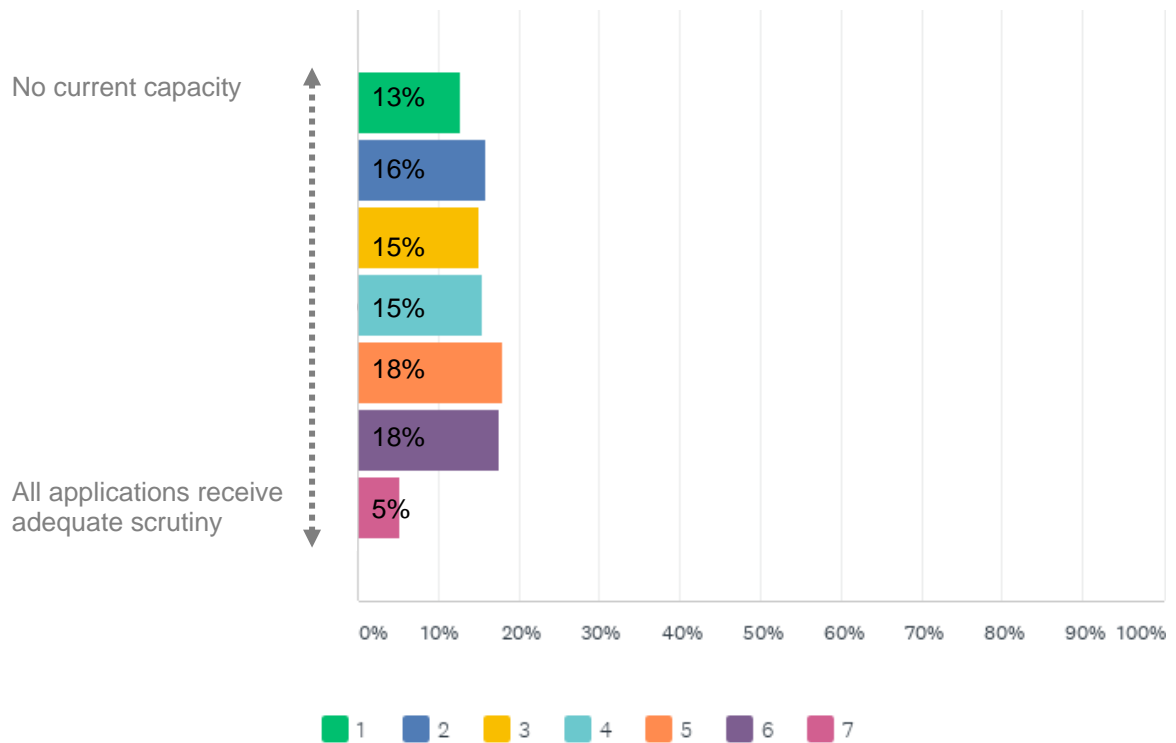
With regard to the overall results (see **Figure 6a**), a high proportion of responses (59%) lay on the scale between 1-4 indicating that for the majority, there is **no or only limited capacity** available to ensure that applications are adequately scrutinised to determine their effect on biodiversity. Most notably, it appears that resources are extremely limited for the majority of LPAs, as evidenced by only 5% of respondents reporting that all applications likely to affect biodiversity are adequately scrutinised (See option 7 in **Figure 6a**).

**Part-time staff:** Access to part time staff not surprisingly has a negative effect on capacity. This is confirmed with the results presented in **Figure 6b**, which shows a marked difference to the results in **Figure 6a**. In **Figure 6b**, nearly 80% of respondents (i.e. from authorities with access to less than one FTE ecologist) report that they have no or very limited capacity. Correspondingly, only 22% of respondents reported their capacity was anywhere near adequate i.e. between 5-7 on the scale.

**Capacity (Q6) vs workload (Q8):** When answers from **Question 6** are compared with answers from **Question 8** (current planning workload) there appears to be no correlation that might show that LPAs with a higher volume of planning casework have access to correspondingly higher ecological capacity.

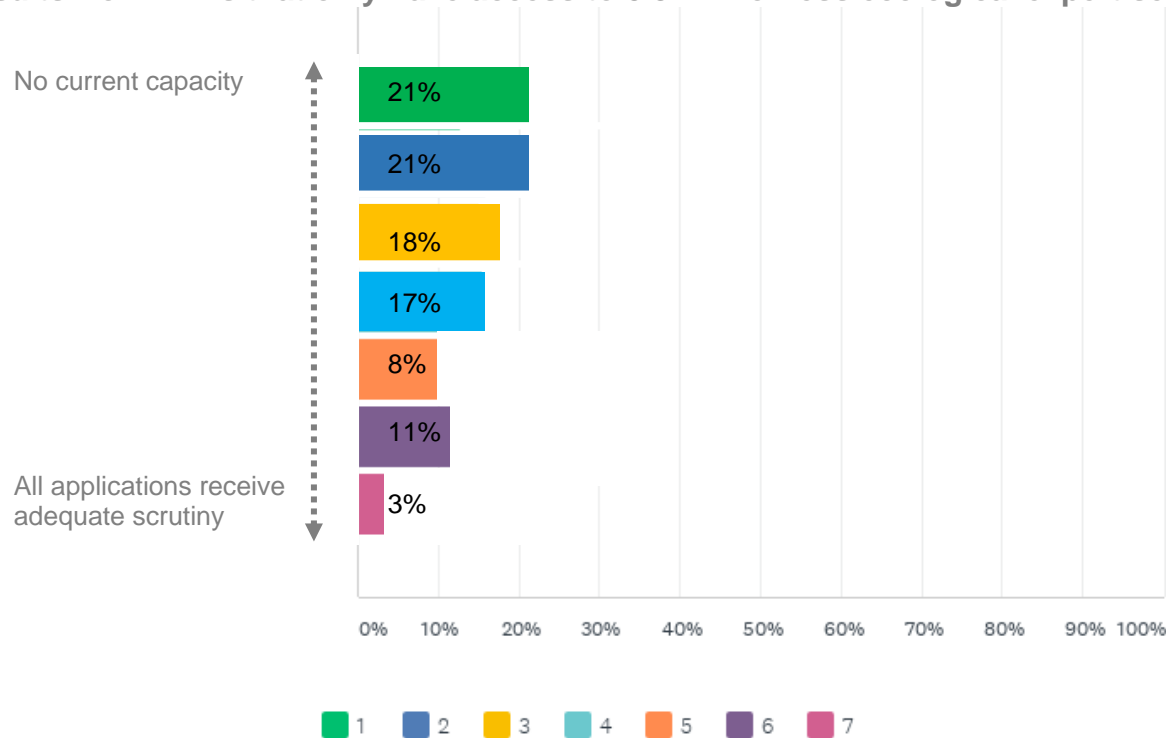
<sup>8</sup> ALGE (2013) Ecological Capacity and Competence in English Planning Authorities. What is Needed to Deliver Statutory Obligations for Biodiversity?

**Figure 6a**  
Result from all respondents



Where 1 = no current capacity and where 7 = all applications that affect biodiversity are adequately scrutinised.

**Figure 6b**  
Results from LPAs that only have access to 0.5 FTE or less ecological expertise



## Q7- How do you normally identify whether an application is likely to affect biodiversity?

A total of 261 responses were received for this question and 76 (23%) gave no response.

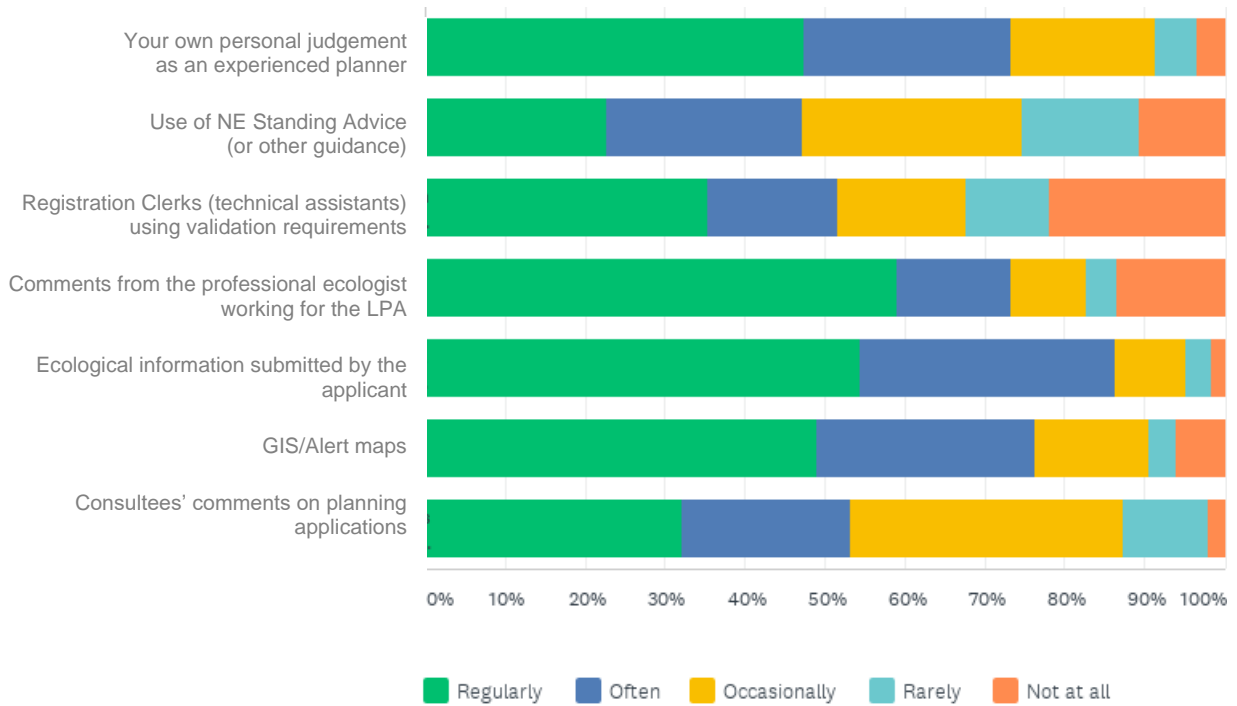
The results indicate that a range of different resources are 'regularly' used by respondents to determine whether an application is likely to affect biodiversity. **Figure 7a** provides a graphic illustration of the proportions of respondents and the use they make of different resources. Headline findings are presented below.

Resources Used	Headline Responses
Own personal judgement as an experienced planner or ecologist	A large proportion of respondents (47%) stated that they 'regularly' use their own personal judgement as an experienced planner to identify whether an application is likely to affect biodiversity. This was followed by 26% who stated that they 'often' use their own personal judgement.
Use of Natural England (NE) Standing Advice (or other guidance)	24% of respondents 'often' refer to NE's Standing Advice/other guidance and 23% 'regularly' refer to the Standing Advice or other guidance.  However, 27% of respondents stated that they only 'occasionally' refer to Standing Advice (or other guidance) and more than half of all respondents do not regularly or often use Standing Advice or guidance.
Registration clerks (technical assistants) using validation requirements	A large proportion of respondents (35%) 'regularly' use registration clerks (technical assistants) using validation requirements to identify whether an application is likely to affect biodiversity.
Comments from the professional ecologist working for the LPA	Over half of the respondents (59%) 'regularly' rely on comments from an LPA ecologist to identify whether an application is likely to affect biodiversity.
Ecological information submitted by the applicant	Over half of the respondents (54%) 'regularly' rely on information submitted by the applicant to determine whether an application is likely to affect biodiversity.
GIS/Planning alert maps	Almost half of respondents (49%) 'regularly' rely on GIS/Planning alert maps to determine whether an application is likely to affect biodiversity.
Consultees' comments on planning applications	A large proportion of respondents (34%) 'occasionally' rely on consultee comments to determine whether an application is likely to affect biodiversity followed by 32% who 'regularly' rely on consultee comments.

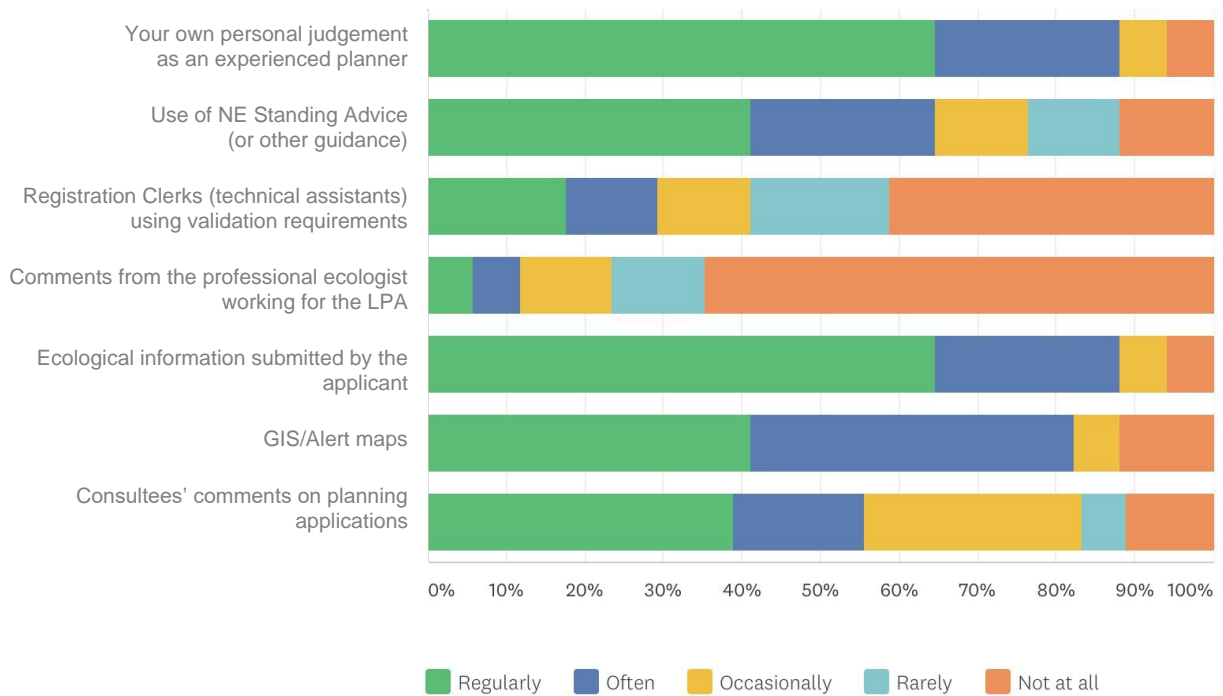
The results were also analysed to identify any differences in sources of advice used by respondents working for an authority without access to any ecological resource (see **Figure 7b**). As can be seen, far fewer respondents (in an LPA without an ecologist) rely on Registration Clerks and Validation Requirement, but they do rely more heavily on their own personal judgement and NE's Standing Advice.

Approximately 35% of those identified in **Figure 7b** also identified that they receive comments from an ecologist working for the LPA. While this appears to be an inconsistency, further investigation of the results, using filters, reveals that these respondents were referring to advice received from either (a) an ecologist shared with at least one other LPA, or (b) an ecological consultancy under contract.

**Figure 7a**  
**Identifying whether an application will affect biodiversity**  
 Results from all respondents



**Figure 7b**  
**Identifying whether an application will affect biodiversity**  
 Results from respondents without access to any ecological expertise





## Q8 – Can you provide an estimate of how many applications your LPA deals with each year where biodiversity is a material consideration

A total of 245 responses were received for this question and 92 (27%) gave no response.

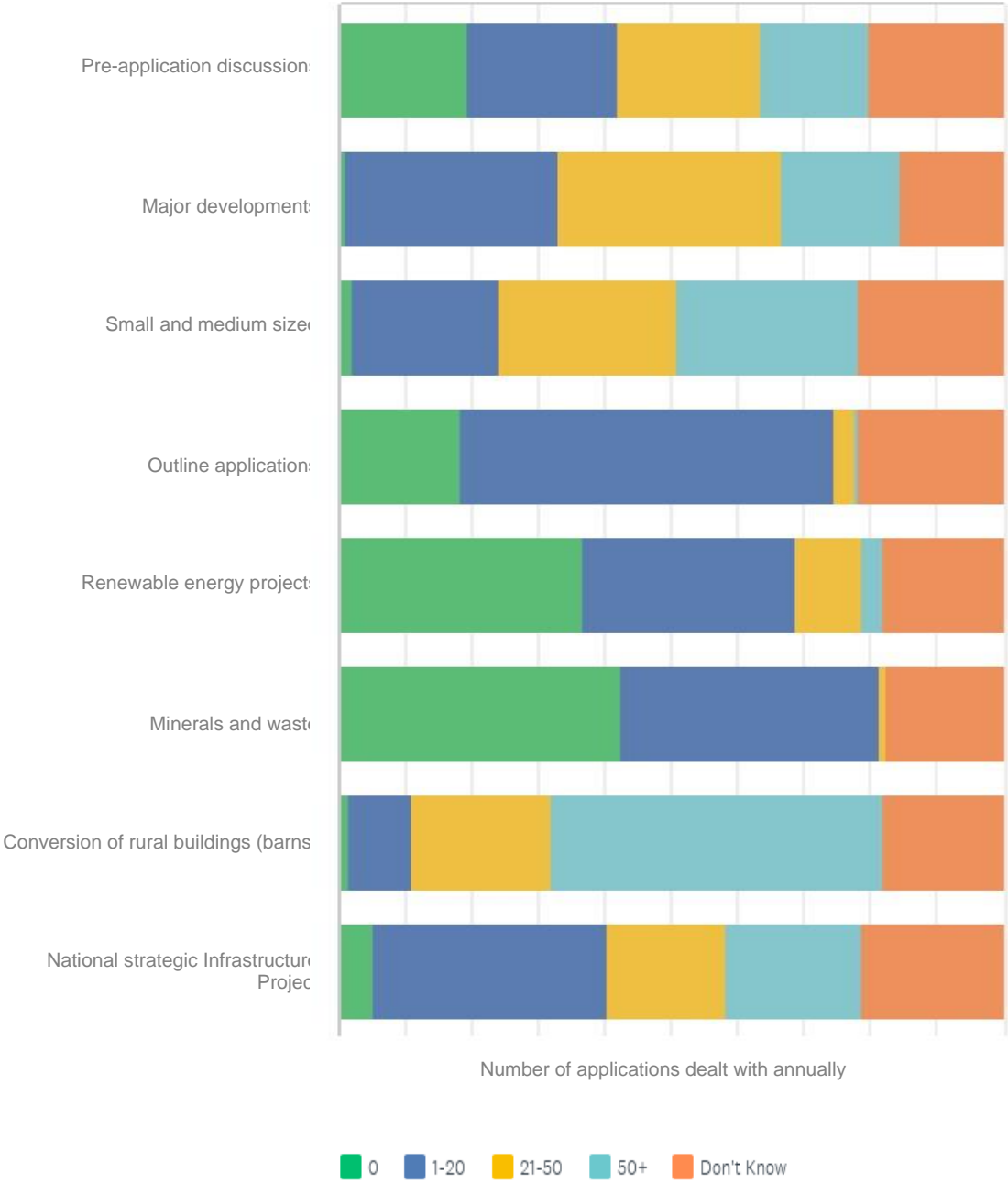
The results show, not surprisingly, that LPAs deal with a wide range of applications annually. However, some types of development are far more common than others. This is illustrated graphically in **Figure 8**, with headline findings presented below.

From the range and number of applications dealt with, it appears that the results from the survey reflect a very good cross section of planners and planning case work.

Types of Application	Headline Responses
Pre-application discussions	The most common response (27%) deal with 50+ pre-app cases each year where biodiversity is a material consideration. This is closely followed by 27% of respondents who deal with 21-50 pre-apps each year.
Major developments <sup>9</sup>	The most common response (33%) deal with 21-50 major development applications per year where biodiversity is a material consideration. This is closely followed by 32% of respondents who deal with 1-20 major development applications each year.
Minor developments (e.g. fewer than 10 houses or less than 1 hectare, as well as single householder applications)	Almost half of the respondents (50%) deal with 50+ small and medium sized applications per year where biodiversity is a material consideration.
Outline applications	The most common response (36%) deal with 1-20 outline applications per year where biodiversity is a material consideration.
Renewable energy projects	Over half of respondents (56%) deal with 1-20 renewable energy projects per year where biodiversity is a material consideration.
Minerals and waste	Many respondents (37%) do not deal with any minerals and waste applications where biodiversity is a material consideration. This is closely followed by 32% of respondents who deal with between 1-20 mineral and waste applications per year.
Conversion of rural buildings (barns)	The most common response (22%) deal with 1-20 applications for conversion of rural buildings per year where biodiversity is a material consideration. This is closely followed by 22% of respondents who deal with 21-50 applications relating to conversion of rural buildings.
Nationally Significant Infrastructure Project	The most common response (43%) chose '0' as the number of Nationally Significant Infrastructure Projects they deal with per year. This was followed by 39% of respondents who deal with 1-20 Nationally Significant Infrastructure Projects per year where biodiversity is a material consideration.

<sup>9</sup> The threshold for a major development is any application that involves the provision of 10+ dwellings or has a site area over 0.5 Hectares. For non-residential it means a floorspace of over 1,000sqm and/or an area of 1 hectare. Anything smaller than is considered as minor development (Page 68; NPPF 2019)

**Figure 8**  
**Estimate of applications involving BNG each year**



## Q9 – What proportion of your total time is involved in the following areas of work?

A total of 238 responses were received for this question and 99 (29%) gave no response.

This question probed the amount of time staff spend on the following activities:

- Planning case work with some BNG<sup>10</sup>
- Habitat opportunity mapping
- Support for Local Nature Partnerships
- Work involving Local Wildlife Sites Network & Corridors
- Management of council land for biodiversity purposes

### Q.9.1 Planning case work with some BNG

**Figure 9.1** shows the results from the respondents who reported that they spend at least some of their time on planning casework where BNG is a consideration. The data in these initial results would indicate that nearly half (48%) of respondents spend up to one third of their time on case work that involves BNG. A further 25% spend between a third and two thirds of their time on such work where BNG is a consideration.

While a total of 337 individuals took part in the survey, only 238 answered this question, meaning nearly 30% (99 individuals) did not answer the question. It is reasonable to assume that those who did not answer this question are not involved in BNG planning casework. If this is correct, **Figure 9.2** probably reflects the true proportion of LPA staff that have some experience of delivering BNG through the planning system; that is: 59% have experience and 41% currently have none (or don't know).

#### Volume of Planning Casework with BNG

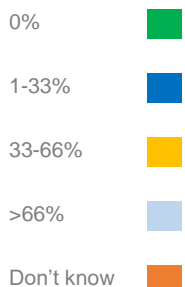


Figure 9.1

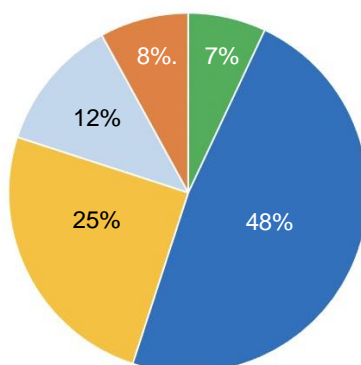
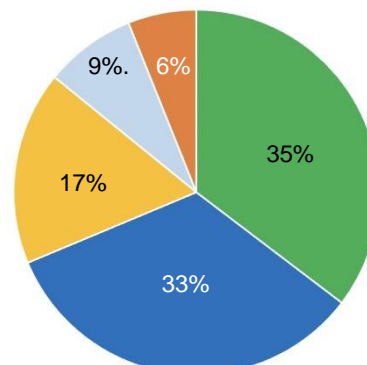


Figure 9.2



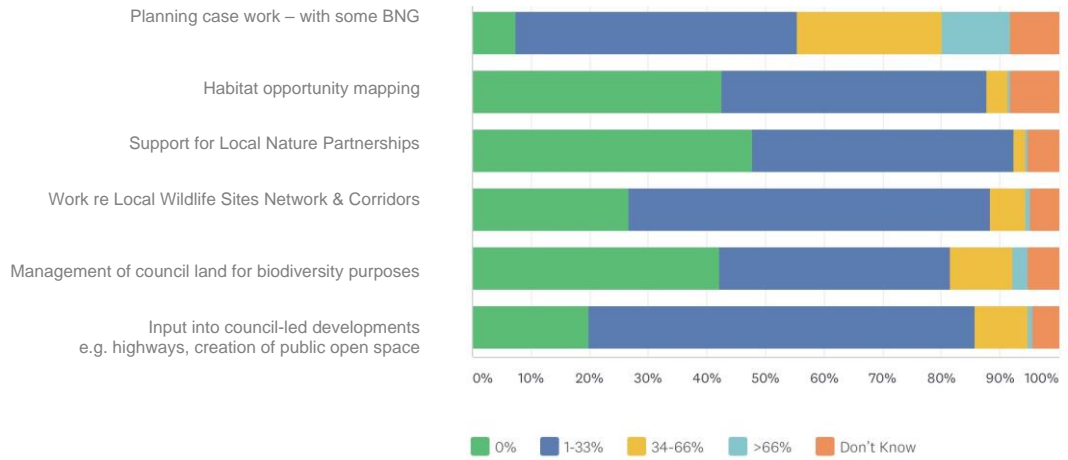
The results for the other activities addressed in **Question 9** are presented graphically showing results from three groups:

- all respondents to this question (See **Figure 9a**)
- only **planners** responding to this question (See **Figure 9b**)
- only **ecologists** responding to this question (See **Figure 9c**)

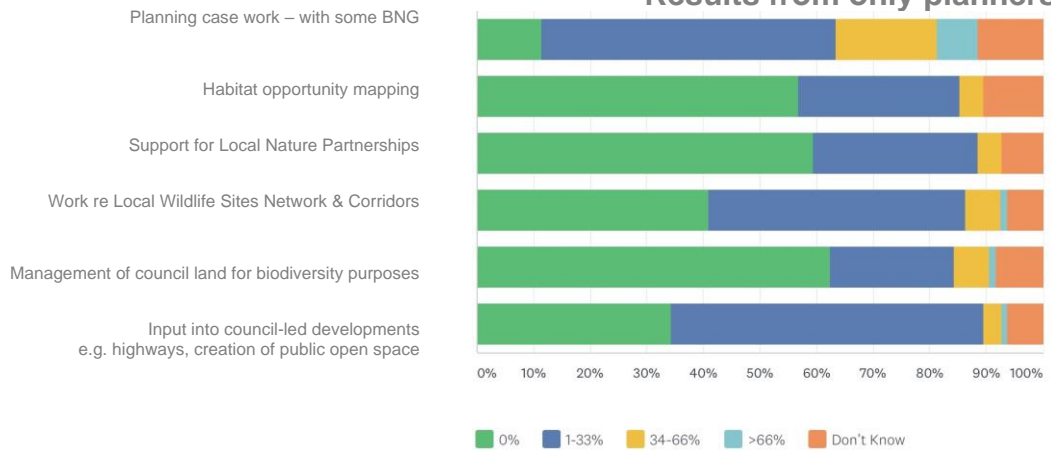
Not surprisingly, the results show that ecologists tend to spend more of their time, than planners, on work involving habitat opportunity mapping, support for Local Nature Partnerships, work involving local wildlife sites network and corridors, and management of council land for biodiversity purposes. Also, while a large proportion of the planners also spend time on case work that involves BNG, many appear to spend less of their overall time on this type of work.

<sup>10</sup> While **Question 9** also asked respondents to indicate the amount of their case work that involves no BNG, the results for this have not been presented in the report because a clearer picture emerges from the results where respondents were asked to report on the amount of time spent on applications where BNG is considered.

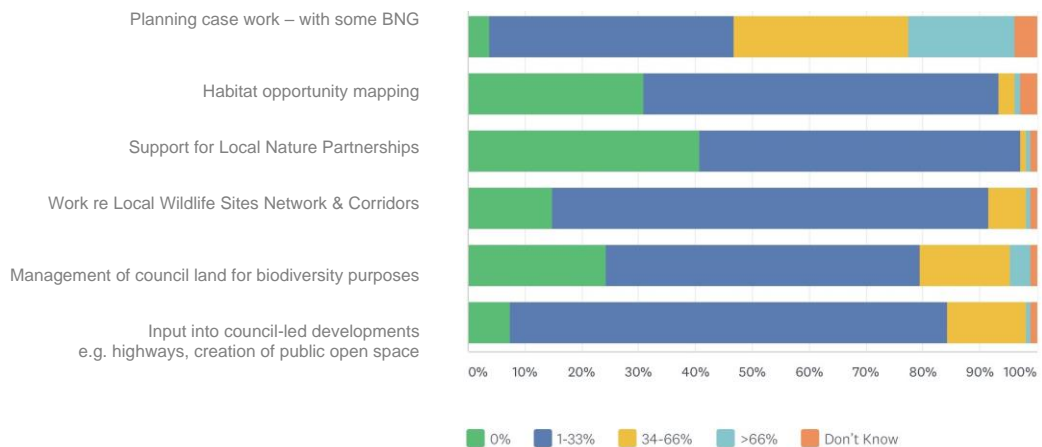
**Figure 9a**  
**Proportion of time spent on different areas of work**  
**Results from all respondents**



**Figure 9b**  
**Proportion of time spent on different areas of work**  
**Results from only planners**



**Figure 9c**  
**Proportion of time spent on different areas of work**  
**Results from only ecologists**



**Q10 – From your experience of planning case work that involves ecological impacts and mitigation what best describes the likely final outcome for the applicant?**

A total of 221 responses were received for this question and 116 (34%) gave no response.

Individuals answering this question were asked to rank six possible outcomes to indicate which they thought was most likely where their case work involves ecological impacts and mitigation, where 1 = most likely/common outcome and 6 = the least likely/common. The results are presented in Survey Monkey as a bar chart – see **Figure 10**. Results are shown as a score (i.e. a weighted average/mean).

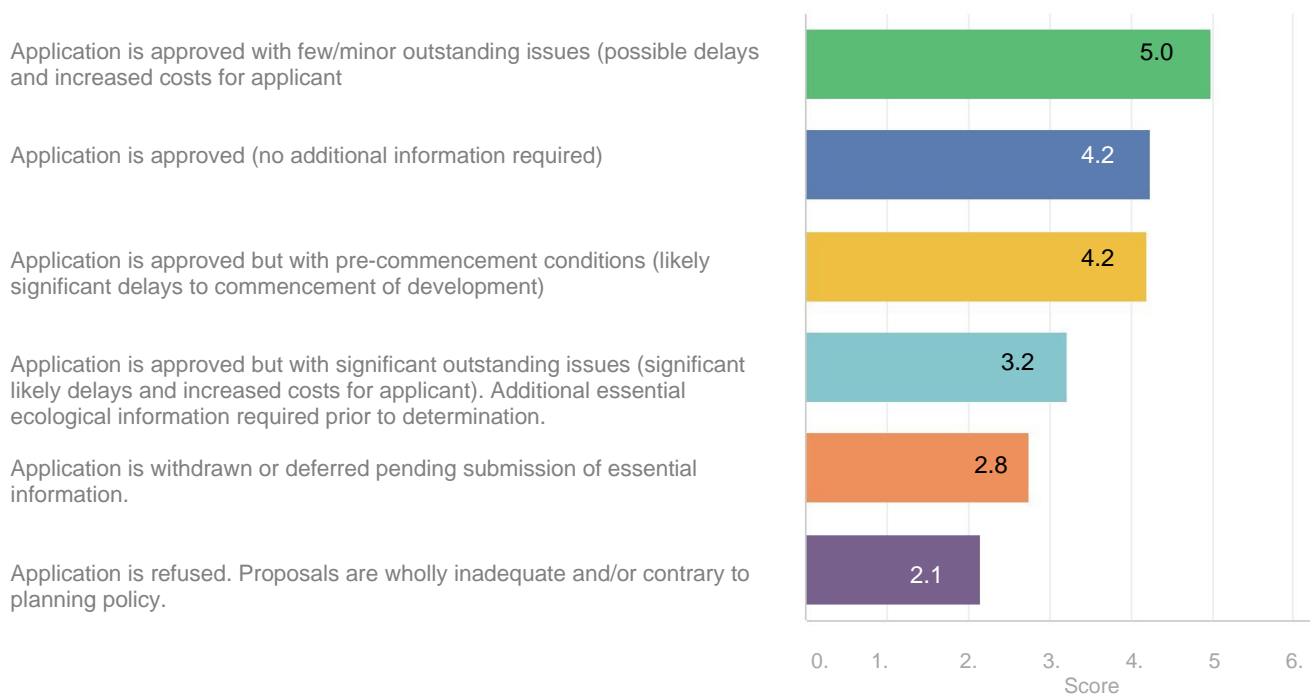
Ideally, the most favourable outcome for both a planning authority and an applicant is represented by the dark blue bar of the chart; that is, all, ecological information is submitted with the application. The least favourable outcomes are at the bottom, where planning permission is either refused or very significant costs and delays are incurred by the applicant while additional information is prepared and submitted to the LPA.

Two of the highest rankings relate to the favourable outcomes at the top of the chart (dark blue and green, indicating that many respondents believe that a significant number of applications involving ecological issues are determined with little delay and minimal increased cost. However, the majority of respondents (i.e. shown by the four lower bars) believe that a much greater proportion of applications are either:

- a) approved only after further essential information is provided by the applicant prior to determination; and/or
- b) approved with pre-commencement conditions that require further essential information to be provided prior to the start of development or (worst case);
- c) refused because of lack of information and/or because of the significance of unmitigated biodiversity impacts.

The conclusion to be drawn from this analysis is that the initial ecological information submitted with a large proportion of planning applications is not adequate to determine the application without additional necessary information being provided by the applicant.

**Figure 10**  
**Outcomes where applications involved ecological impacts**



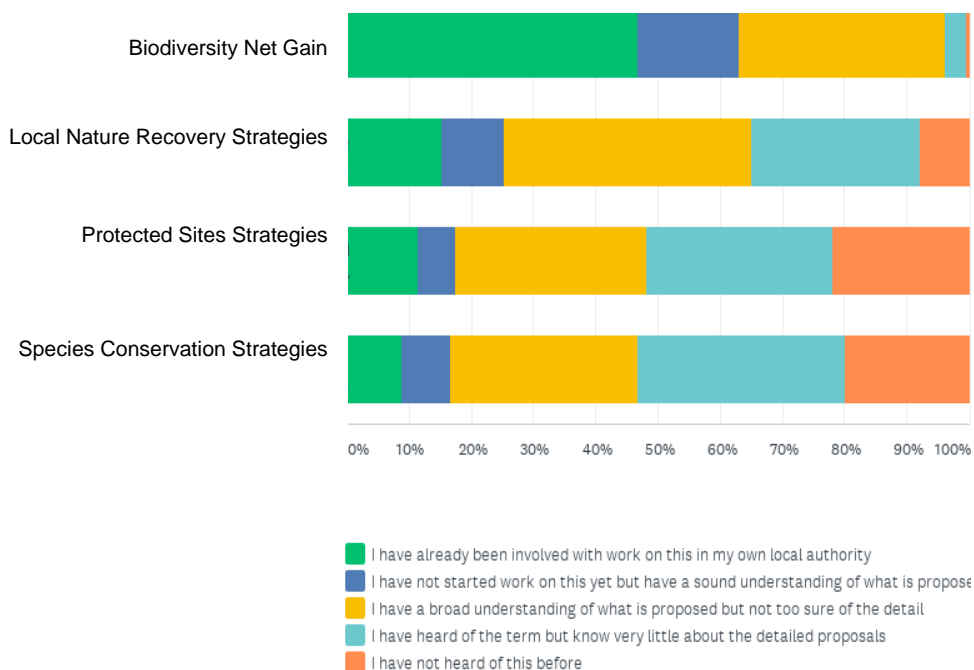
## Q11 – How would you describe your understanding of the following elements within the Environment Bill?

A total of 234 responses were received for this question and 103 (31%) gave no response.

Many respondents (47%) are already working on BNG. However, the proportion of respondents working on Local Nature Recovery Strategies (15%), Protected Sites Strategies (11%) and Species Conservation Strategies (9%) appears to be much lower in comparison. At best, understanding about Local Nature Recovery Strategies, Protected Sites Strategies, and Species Conservation Strategies appears for the most part to be broad or limited in the detail.

Element of Env. Bill	Headline Responses
Biodiversity Net Gain	A large proportion of respondents (47%) said that they had already been involved with BNG work, while 33% have a broad understanding but are not too sure of the detail.
Local Nature Recovery Strategies	A large proportion of respondents (40%) said they had a broad understanding but were not too sure of the detail. 15% of respondents have already been involved with work on Local Nature Recovery Strategies.
Protected Sites Strategies	Nearly a third of respondents (31%) said they had a broad understanding of Protected Sites Strategies but were not sure of the detail with a further 30% knowing very little. 22% of respondents had not heard of Protected Sites Strategies.
Species Conservation Strategies.	A third of respondents (33%) had heard of Species Conservation Strategies but know very little about the detailed proposals, and 30% of respondents have a broad understanding but are not too sure of the detail. 20% of respondents had not heard of Species Conservation Strategies before.

**Figure 11**  
Understanding of proposals in the Environment Bill



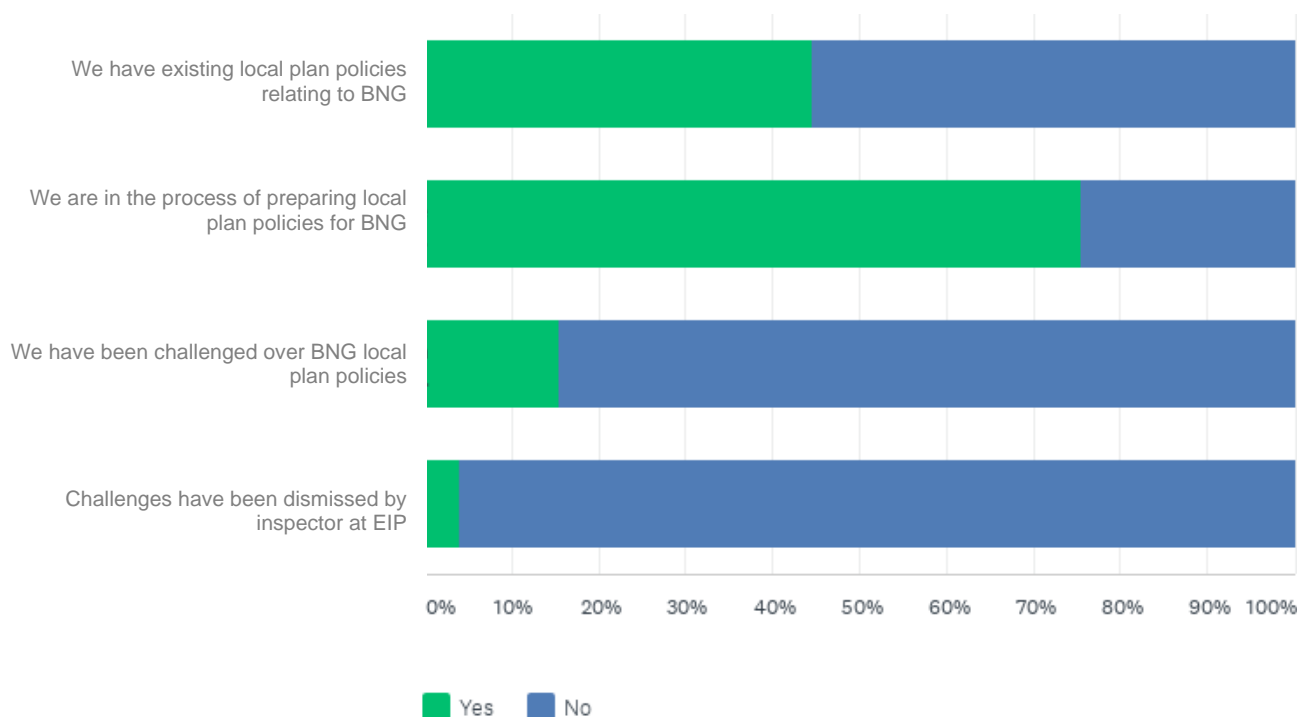
## Q12 – Does your LPA have experience of BNG in Planning Policy work?

A total of 229 responses were received for this question and 108 (32%) gave no response.

Over half of the LPAs who responded to this question do not currently have existing local plan policies relating to BNG in place. The majority are however in the process of preparing BNG policies.

Policy Work	Headline Responses
We have existing local plan policies relating to BNG	Less than half (45%) of respondents stated that their LPA has existing local plan policies relating to BNG in place.
We are in the process of preparing local plan policies for BNG	However, 76% of respondents who do not currently have policies did say that they were in the process of preparing local plan policies for BNG.
We have been challenged over BNG local plan policies	Only 15% of LPAs that responded to this question have been challenged over BNG local plan policies.
Challenges have been dismissed by inspector at EIP.	Where local plan BNG policies have been challenged through the Examination in Public (EIP), only 4% of respondents reported that the challenge had been upheld by an Inspector.

**Figure 12**  
Experience of BNG in planning policy work



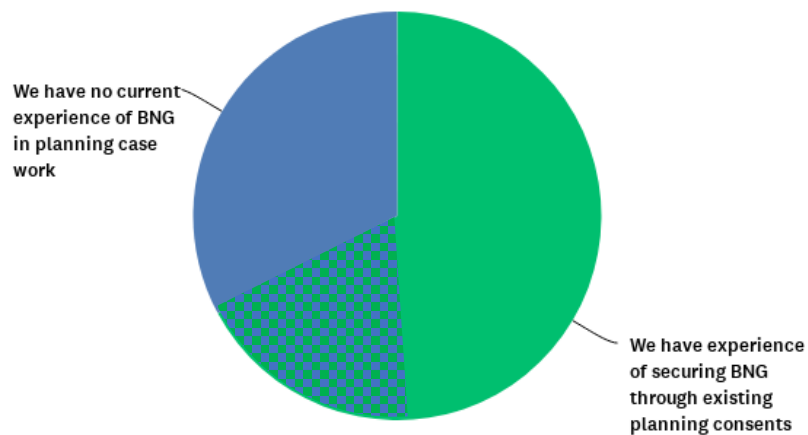
### Q13 – BNG and Development Management Case Work

A total of 226 responses were received for this question and 111 (33%) gave no response.

Two thirds of the respondents (67%) have experience of securing BNG through existing planning consents whilst the remaining third (33%) report that they have no current experience of BNG in planning case work.

While a total of 337 individuals took part in the survey, only 226 answered this question, meaning approximately one third (111 individuals) did not answer the question. If we assume that those who did not answer the question did so because they have no experience of BNG, this would suggest that the actual total proportion of LPA staff with no experience of BNG is likely to fall somewhere between 33% and 54% of all those taking part in the survey (see hatched area in **Figure 13**).

**Figure 13**  
Experience of BNG in development management case work





## Q14 – Do you use the Defra biodiversity metric when securing BNG?

A total of 152 responses were received to this question and 185 (55%) gave no response.

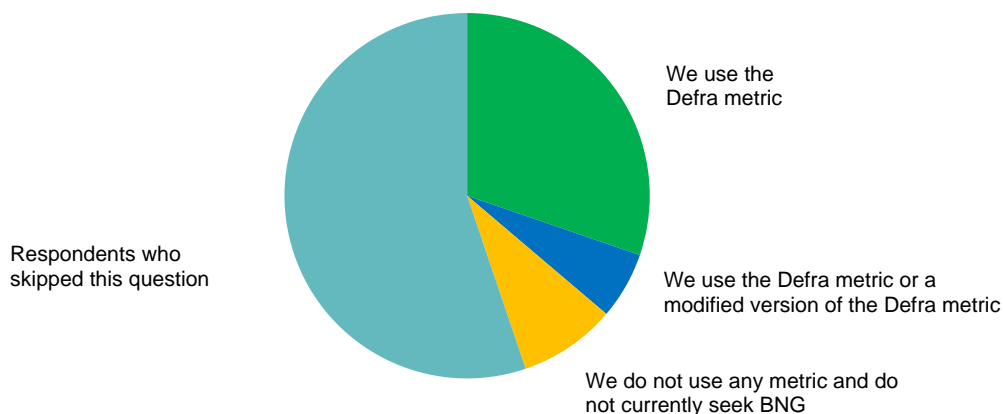
Of those individuals that are involved in securing BNG, the majority (68%) said that they use the Defra metric, while 13% use a modified version. Also, 19% of respondents who answered this question do not currently use any kind of metric and do not currently seek BNG through their planning functions (See **Figure 14**).

Listed in descending order, the proportion of respondents using the metric shown by their LPA are:

- Districts
- Unitary Authorities
- County Councils
- Borough Authorities
- National Parks
- Other (e.g. a local biodiversity record centre, an NGO and an ecological consultant)

Perhaps not surprisingly, 75% of respondents that are using a metric reported that they have access to an in-house ecologist. Use of a modified metric does not appear to reduce the success of negotiating BNG with applicants. Those using a modified Defra metric have secured BNG through 19 applications. These LPAs have also won both of the two decisions that have been challenged at planning appeals.

**Figure 14**  
Use of the Defra metric - results from 151 respondents



While 152 individuals answered this question, a further majority of 185 skipped it entirely. It seems likely that the reason for skipping this question is either:

- a) respondents did not know if their LPA uses any form of metric  
OR (as seems more likely based on other answers in the survey)
- b) their LPA does not currently attempt to secure any form of BNG and therefore does not use a metric.

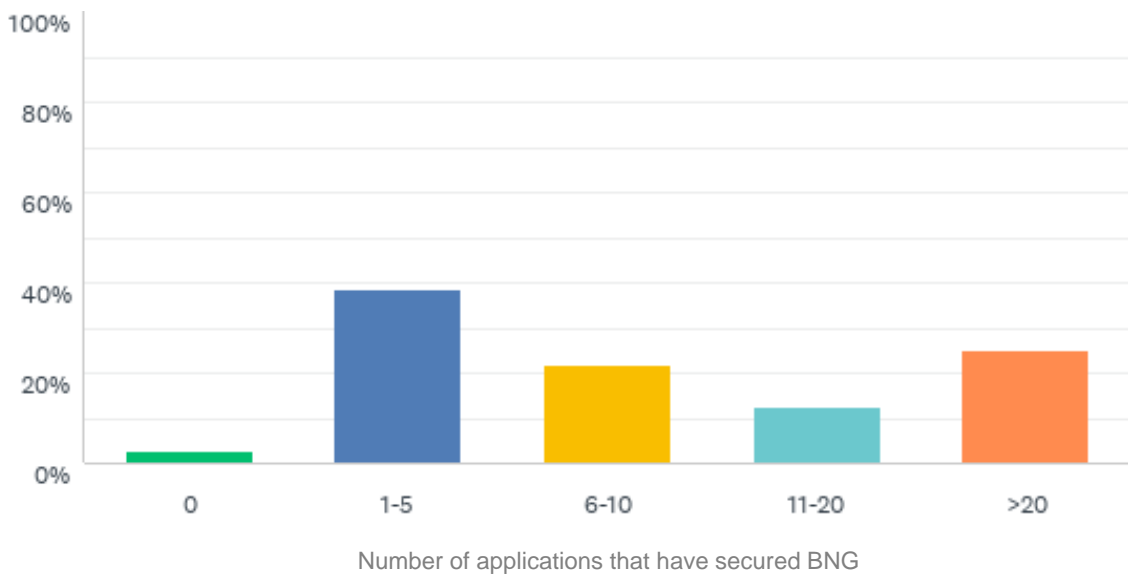
While only an assumption, if the latter is correct, this would mean a total of 214 respondents (64% of all those taking the survey) are working in LPAs that are not currently seeking any BNG in their planning casework.

**Q15 – In the last 12 months, how many applications determined by your LPA have secured BNG?**

A total of 144 responses were received for this question and 193 (57%) gave no response.

The majority of respondents to this question state that they had secured BNG over the past year. Most respondents (38%) secured net gain for between 1-5 developments. This was followed by 25% who secured net gain for over 20 developments (see **Figure 15a**).

**Figure 15a**



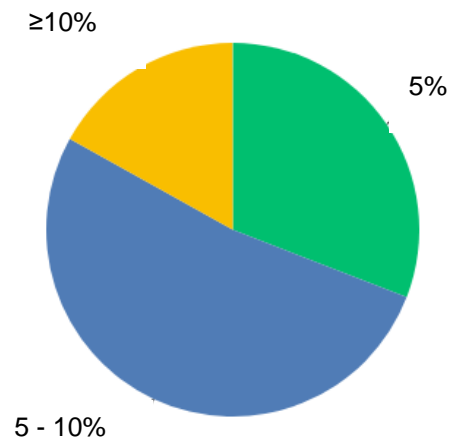
However, 193 individuals did not respond to this question, so the overall situation is likely to mean that a large proportion (nearly 60%) of those taking part in the survey are unlikely to have any current experience of dealing with applications involving BNG.

### Q16 – What is the average percentage of net gain secured?

A total of 137 responses were received for this question and 200 (59%) gave no response.

Of those who responded to this question, over half (52%) secured a net gain of between 5-10%, with 17% securing over 10% net gain (see Figure 16).

**Figure 16**  
Average percentage of net gain secured

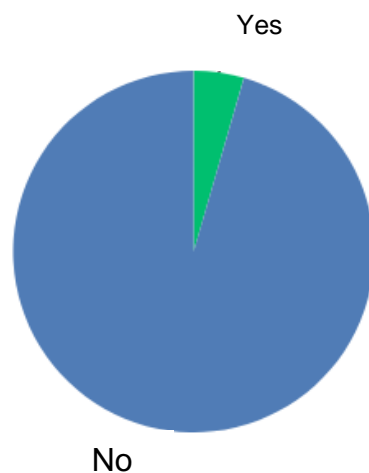


### Q17 – Have you defended decisions relating to BNG at planning appeals?

A total of 223 responses were received for this question and 114 (34%) gave no response.

Of those responding to this question, the overwhelming majority (95%) having no experience of defending planning decisions relating to BNG at planning appeals (see Figure 17)..

**Figure 17**  
Defence of net gain decisions at planning appeals



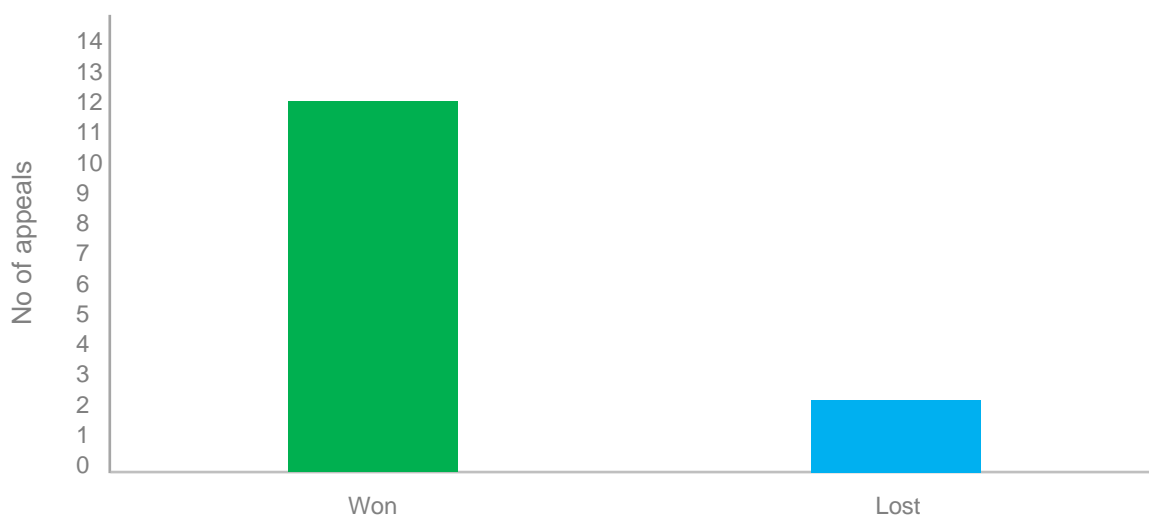
### Q18 – If yes to the above, how many appeals has the LPA won and lost?

Of all the respondents, only nine reported that they had successfully defended planning decisions relating to BNG at planning appeal. Between them, these nine respondents have defended a total of 14 cases at appeal.

Of the remaining 328 (97%) respondents, it is most likely that they that did not answer this question because they have not yet defended BNG at appeal.

Of those that have had their decision challenged at appeal, the LPA was successful in defending their decision in 12 cases and were unsuccessful in only 2 cases (see Figure 18).

**Figure 18**  
Proportion of appeals over BNG won and lost



Also, the two authorities that report that they have lost at appeal, have reported that they have also won other appeals where BNG was an issue.

Local planning authority	Won	Lost
'X' in South East	3	1
'Y' in East Midlands	1	1

### Q19 – To what extent do you expect planning reforms to enable BNG delivery and the preparation of Local Nature Recovery Strategies?

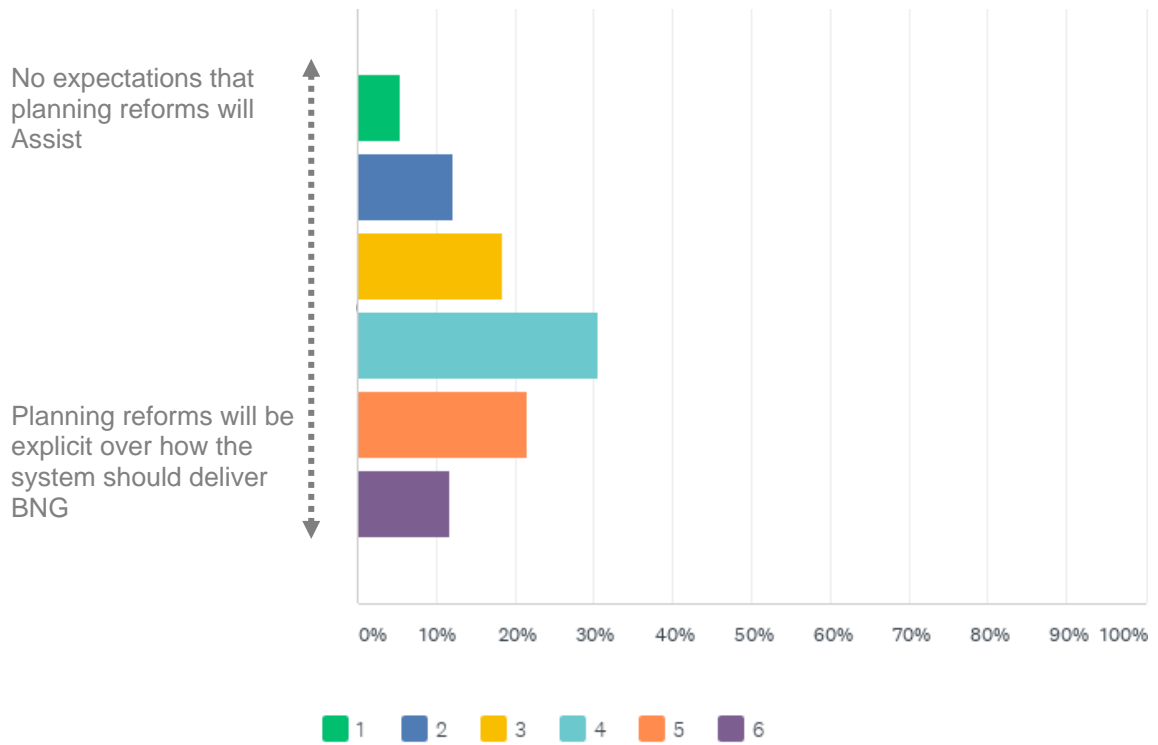
Answers were ranked where 1 = no expectation that planning reforms will assist and 7 = expectation that planning reforms will be explicit over how the system should deliver BNG and LNRs.

A total of 223 responses were received for this question and 114 (34%) gave no response.

The results shown in **Figure 19** indicate that the majority of respondents are neither entirely optimistic nor pessimistic over the likely linkages that may be made between future planning reforms and the introduction of BNG. Instead, they fall somewhere in the middle, where the greatest number of respondents (49%) fall under categories '3' and '4' in the mid-range between no expectation ('1') and full expectation ('7').

Figure 19

### Expectation that planning reforms will enable delivery of BNG and the preparation of Local Nature Recovery Strategies?

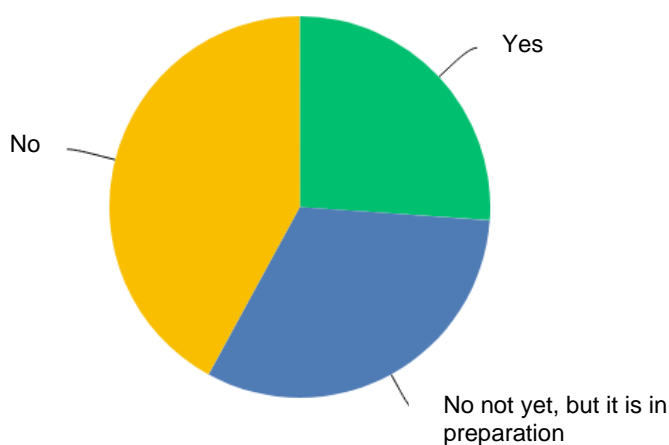


**Q20 – Do you have a Biodiversity Strategy, Supplementary Planning Document (SPD) or relevant Local Nature Partnership document that underpins your natural environment policies in the local plan?**

A total of 227 responses were received for this question and 110 (33%) gave no response.

Question 12 sought to identify how many LPAs currently have BNG policies in their statutory local plans. Question 20 then seeks to establish how many have additional local (non-statutory) supporting biodiversity strategies or guidance documents. The results show that a large proportion of the respondents (42%) do not currently have any such documents to underpin local plan policies. However, 32% state that these documents are in preparation.

**Figure 20a**  
**LPAs with their own biodiversity planning guidance**



While 227 individuals answered this question, a further 110 skipped it entirely. It seems likely that the reason for skipping this question is either:

- a) respondents did not know if their LPA has any of the guidance referred to in the question;  
OR (as seems more likely based on other answers in the survey)
- b) their LPA is currently not preparing any form of guidance.

While only an assumption, if the latter is correct, this would mean a total of 206 respondents (61% of all those taking the survey) have no relevant guidance and are not yet in the process of preparing any.

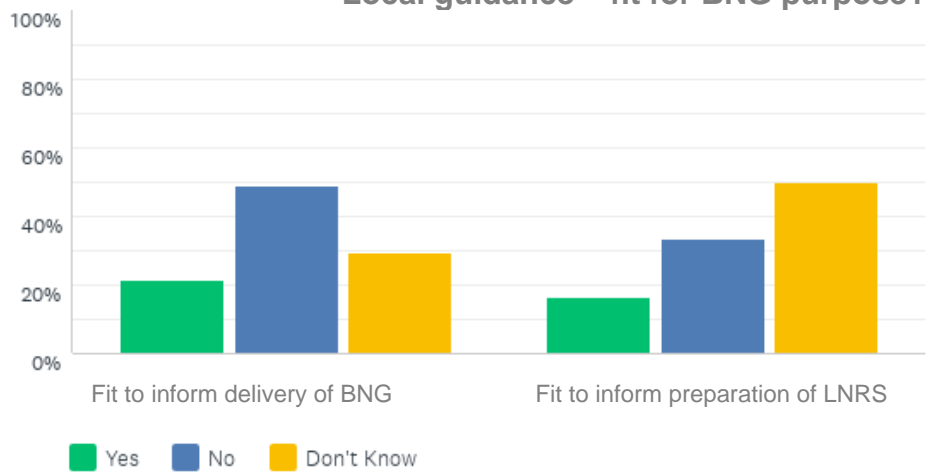
**Q21 – In your opinion, is the above planning guidance fit to inform the delivery of BNG and preparation of your LPA’s Local Nature Recovery Strategy (LNRS)?**

A total of 61 responses were received for this question and 276 (82%) gave no response.

The responses received indicate that very little of the existing guidance is adequate to inform the delivery of BNG or the preparation of the LPA’s LNRS. For instance:

Fit to inform delivery of BNG	Almost half of the respondents (49%) did not feel that their existing planning guidance was sufficient to inform the delivery of BNG. A further 30% did not know.
Fit to inform preparation of LNRS	Half of the respondents (50%) did not know if their existing guidance was sufficient to inform the preparation of LNRS. 33% did not think their guidance was sufficient.

**Figure 21a**  
**Local guidance – fit for BNG purpose?**



While only an assumption, it appears likely that the 276 respondents (over 90% of the total taking part in the survey) that skipped this question did so because their LPAs do not yet have any relevant guidance that might be used to inform BNG or LNRSs.

## Q22 – Who do you expect to lead the development of the Local Nature Recovery Strategy for your area?

Only 90 responses were received for this question and 247 (73%) gave no response.

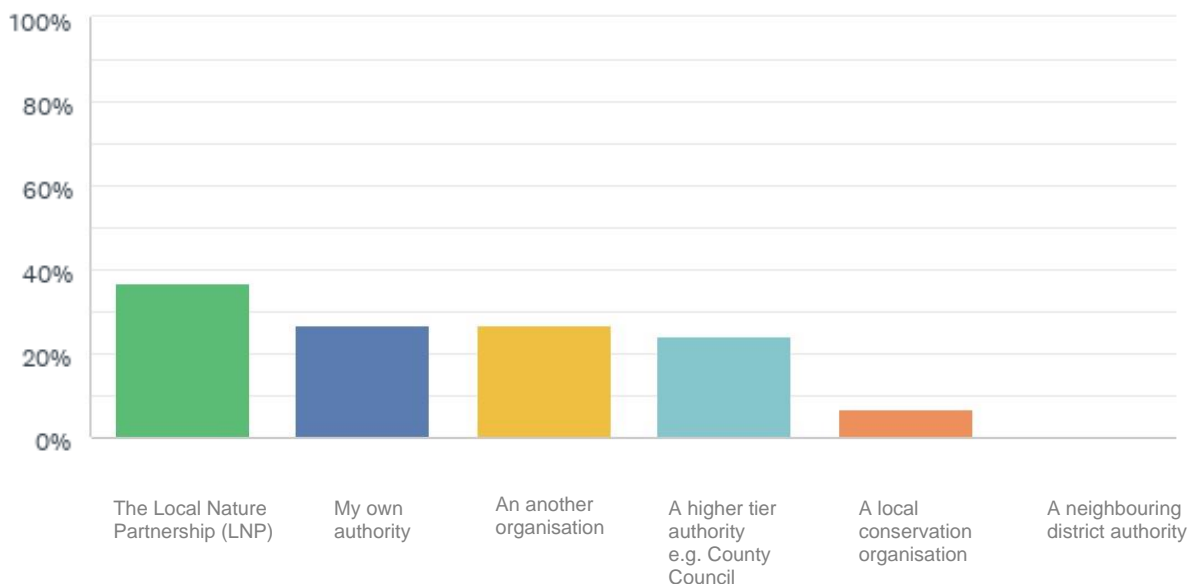
The largest proportion of respondents (36%) expect LNRSs to be led by a Local Nature Partnership. 27% of respondents are expecting their own authority to lead, followed closely by 25% expecting LNRSs to be led by a higher tier LPA (e.g. County Council).

Over a quarter (27%) of respondents picked the 'Other' category. These include:

- Many of the London and Metropolitan Borough Councils believe that the LNRS will be prepared as a partnership with other similar authorities in their area.
- Other respondents also identified other local partnerships, especially if they are in an area where there is currently no Local Nature Partnership.
- Two respondents also provided amusing insight; one answered this question with “*Lord knows*” and the other said “*Don't know, until I started this survey, I had not heard of them*”.
- Several respondents answered that it might be either Natural England or the local wildlife trust.

With the very low response rate to this question, it is assumed that a large majority of respondents do not know enough about LNRSs to provide an answer.

Figure 22  
Expected lead on LNRS



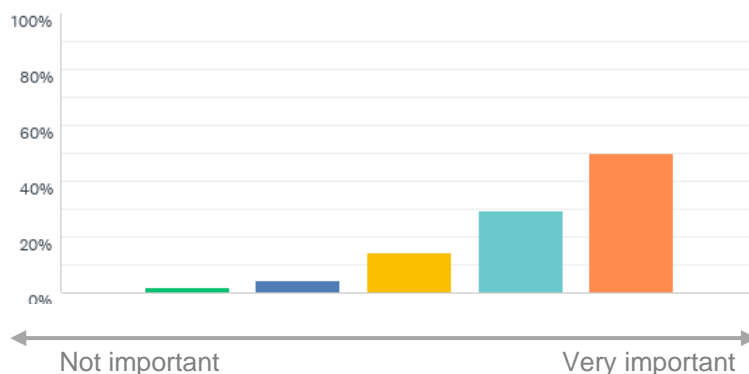


**Q23 – In your opinion, what priority should your LPA attach to preparing local guidance for the introduction of Biodiversity Net Gain?**

Answers were ranked where 1 is a very low priority and 5 is very high priority.

A total of 225 responses were received, while 112 (33%) gave no response. A total of 80% of those that did respond are of the opinion that LPAs should attach a very high priority (50%) or 'high priority' (30%) to the preparation of local guidance to support the introduction of BNG.

**Figure 23**  
Priority for preparing local guidance

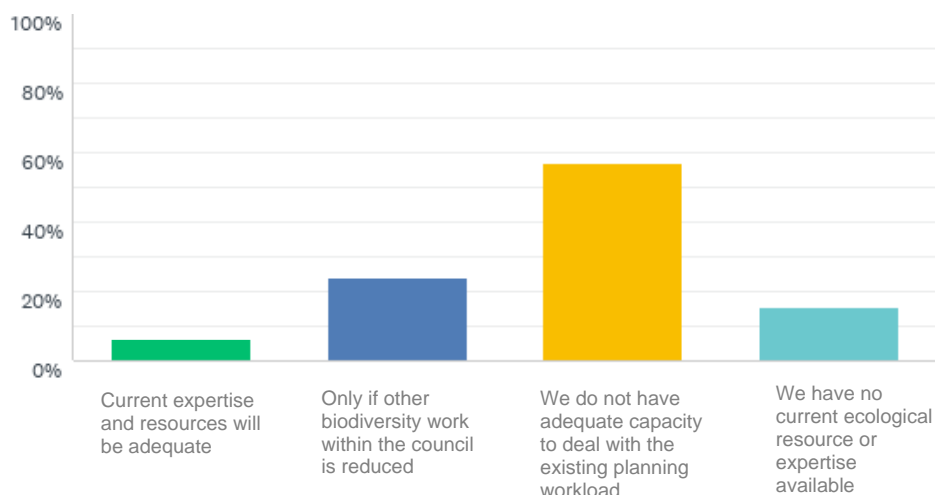


**Q24 – In your opinion, to what extent will your current resources be adequate to assess whether an application will need to deliver BNG?**

A total of 223 responses were provided for this question, while 114 (34%) gave no response. Over half of the respondents (57%) state that they do not currently have adequate capacity to deal with the existing planning workload (see solid orange bar in **Figure 24**). A further 24% state that they would only have capacity if other biodiversity work were reduced (see solid and hatched blue bar). An additional 15% state that they have no current ecological resource or expertise to assess whether an application will need to deliver BNG. Only 9% of respondents state that their current resources are adequate.

However, one third (114) of respondents did not answer this question, suggesting that these respondents do not have access to regular ecological expertise. If this is the case, and this would mean that over 70% of respondents do not believe their LPAs have capacity to deal with current workloads.

**Figure 24**  
Adequacy of current resources to assess BNG proposals



**Q25 – On a scale of 1 to 5 what is your own current expertise and capability in relation to BNG issues** i.e. what do you feel competent to do?

Answers were ranked where 1 = not confident at all and 5 = I feel I am an expert.

A total of 225 responses were received for this question and 112 (33%) gave no response.

The results indicate that there is a considerable range over which respondents feel they have expertise and capability in relation to BNG issues. **Figure 25** provides a graphic illustration of how confident respondents feel about the activities listed. Headline findings are presented below.

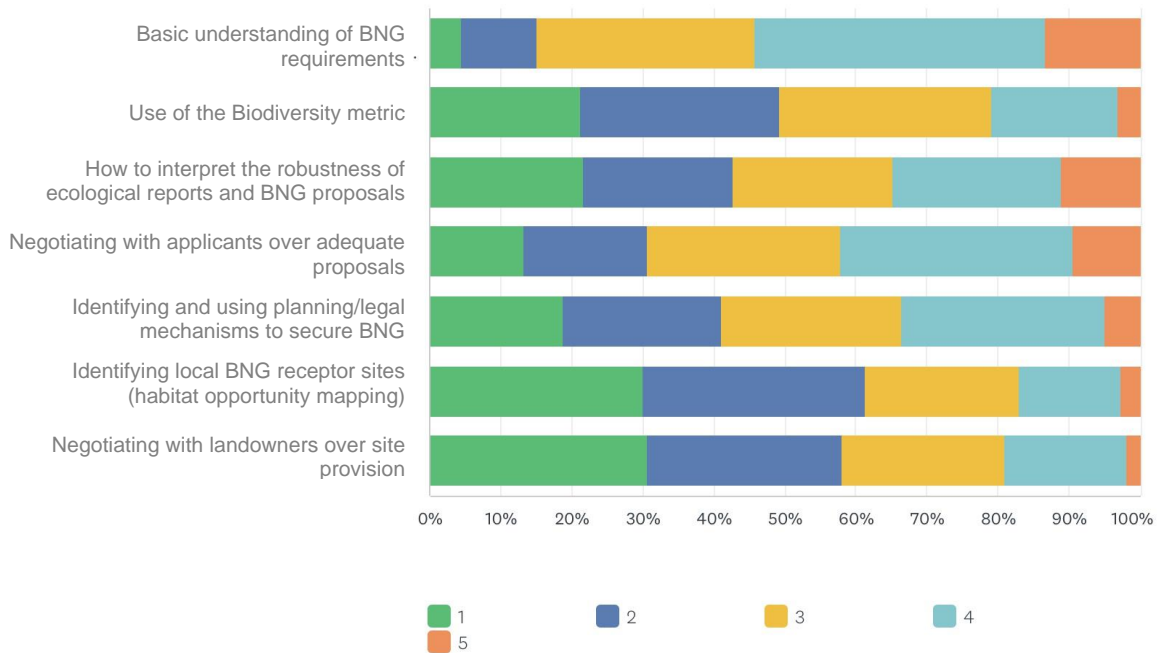
The overall pattern that seems to emerge from these results is not surprising. BNG is currently not mandatory, and only a minority of LPAs have started to develop any expertise in this area of work. For most respondents, this means that they may have some knowledge about some aspects of what is required, but very few have been sufficiently involved over a long enough period to have developed what might be called expertise.

**BNG Activities**

**Headline Responses**

Basic understanding of BNG requirements	41% of respondents chose option '4' followed by 31% who chose option '3'. This indicates that most respondents have some capability in terms of BNG but do not consider themselves to be experts.
Use of the biodiversity metric	Over half of the respondents chose options '2-3' (58%) indicating basic knowledge of the biodiversity metric but lacking in confidence in some aspects.
Identifying local BNG receptor sites (habitat opportunity mapping)	Over half of respondents chose options '1-2' (61%) indicating that they do not feel competent or only have limited knowledge of habitat opportunity mapping.
How to interpret the robustness of ecological reports and BNG proposals	No discernible pattern in response to this question as there was an almost even spread of responses between options 1 and 4 with only small variations in % (range between 21% and 24%).
Identifying and using planning/legal mechanisms to secure BNG	The largest proportion of respondents chose option '4' (28%) followed by option '3' (26%) indicating that capabilities exist but expertise is lacking.
Negotiating with applicants over inadequate proposals	33% of respondents chose option '4' followed by 27% who chose option '3' indicating that capabilities exist but expertise is lacking.
Negotiating with landowners over site provision.	Over half of respondents chose options 1-2 (58%) indicating that they do not feel competent or only have limited knowledge of negotiating with landowners over site provision.

**Figure 25**  
**Current expertise and capability relating to BNG**

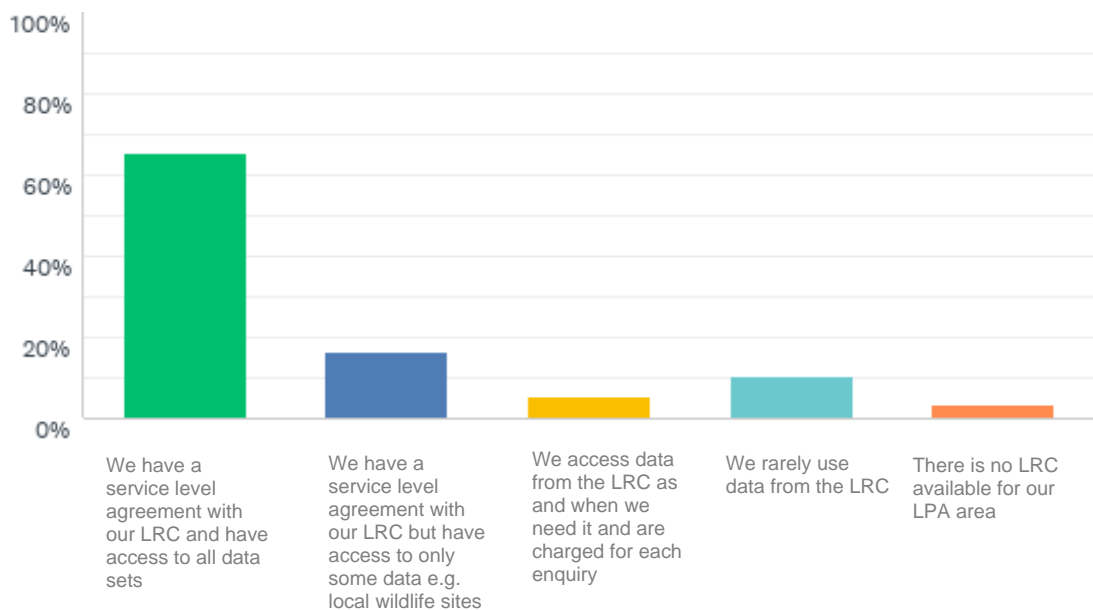


**Q26 – What access do you have to data held by a local biodiversity records centre?**

A total of 213 responses were received for this question and 124 (37%) gave no response.

The majority of those responding (66%) have a service level agreement with their Local Biological Records Centre and access to all data sets. 16% have a service level agreement but only access to certain data sets e.g. local wildlife sites. 10% of respondents state that they rarely use Local Biological Records Centre data and 6% access data as and when they need it and are charged for each enquiry. Only 3% of respondents state that they do not have a Local Biological Records Centre for their LPA area.

**Figure 26**  
**Access to local biodiversity data**



## Q27 – Which sources of ecological data do you think will be most useful to inform decisions over BNG?

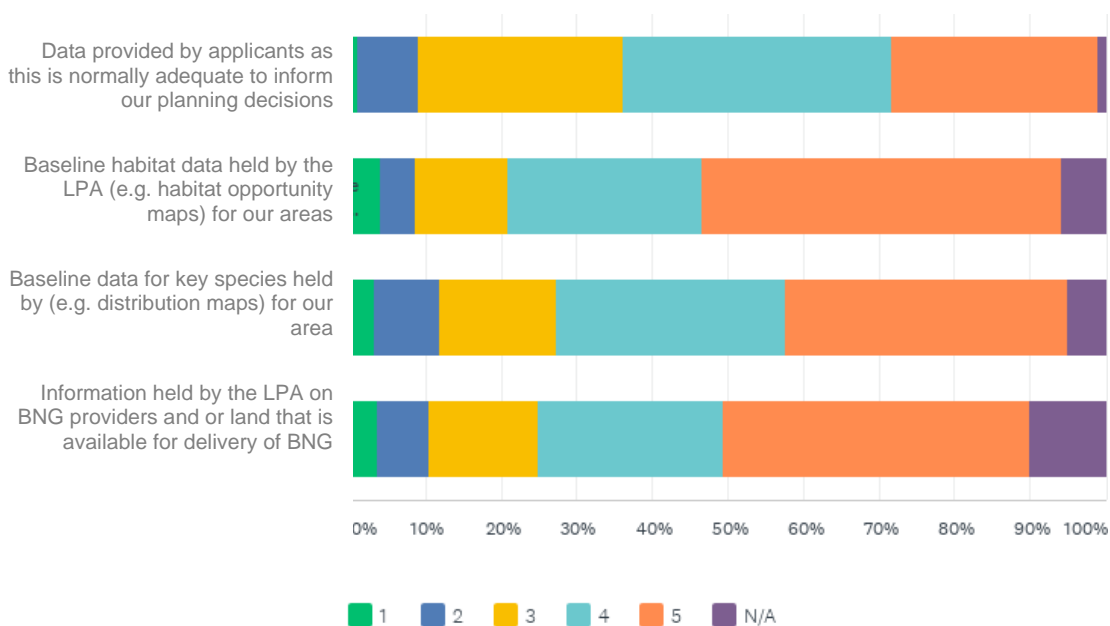
Answers were ranked where 1 = of little use and 5 = extremely useful.

A total of 223 responses were received for this question and 114 (34%) gave no response.

The results indicate that overall respondents believe data held by their authority is most useful. **Figure 27** provides a graphic illustration of how useful respondents feel different data sources to be. Headline findings are presented below.

Sources of data to inform BNG	Headline Responses
Data provided by applicants as this is normally adequate to inform our planning decisions	Over half of respondents (63%) chose options 4 and 5 indicating that this information is considered to be very useful to inform BNG decisions.
Baseline habitat data held by the LPA (e.g. habitat opportunity maps) for our area	Nearly half of the respondents chose option 5 (48%) indicating that this information is considered to be extremely useful to inform BNG decisions.
Baseline data for key species (e.g. distribution maps) for our area	Over two thirds of respondents (68%) chose options 4 and 5 indicating that this information is considered to be very useful to inform BNG decisions.
Information held by the LPA on BNG providers and/or land that is available for delivery of BNG.	The largest proportion of respondents (41%) chose option '5' indicating that this information is considered to be extremely useful to inform BNG decisions.

**Figure 27**  
Most valuable sources of ecological data



## Q28 – What are your preferred options for identifying and securing land for delivery of BNG?

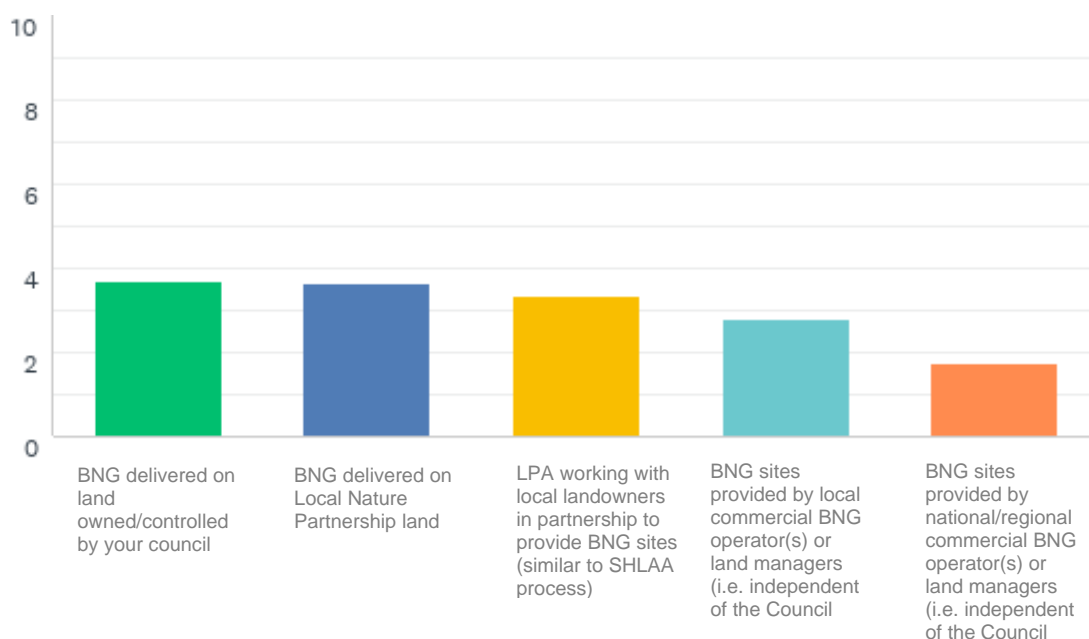
Answers were ranked where 1 = most preferred and 5 = least preferred.

A total of 209 responses were received for this question and 128 (38%) gave no response.

Overall results indicate that preferred options for identifying and securing land for BNG delivery is either on land controlled by the LPA or Local Nature Partnership.

Preferred Options	Headline Responses
BNG delivered on land owned/controlled by your council	The largest proportion of respondents (44%) stated that this was their most preferred option.
BNG delivered on Local Nature Partnership land	Over half of respondents (66%) chose options 1 and 2 indicating that this is a preferred option.
LPA working with local landowners in partnership to provide BNG sites (similar to Strategic Housing Land Availability Assessment process)	The highest proportion of respondents (38%) chose option '3' in the mid-range of most preferred and least preferred followed by 25% who chose option '2'.
BNG sites provided by commercial local BNG operator(s) or land managers (i.e. independent of the Council)	Around half of respondents (51%) chose option '4' indicating that this is not a preferred option for the majority.
BNG sites provided by commercial national/regional BNG operator(s) (i.e. independent of the Council)	Over two thirds of respondents chose option '5' (66%) indicating that this is the least preferred option.

**Figure 28**  
Preferences for securing biodiversity net gain land



### Q29 – How important do you think robust legal agreements and/or conservation covenants will be in securing actual delivery of BNG?

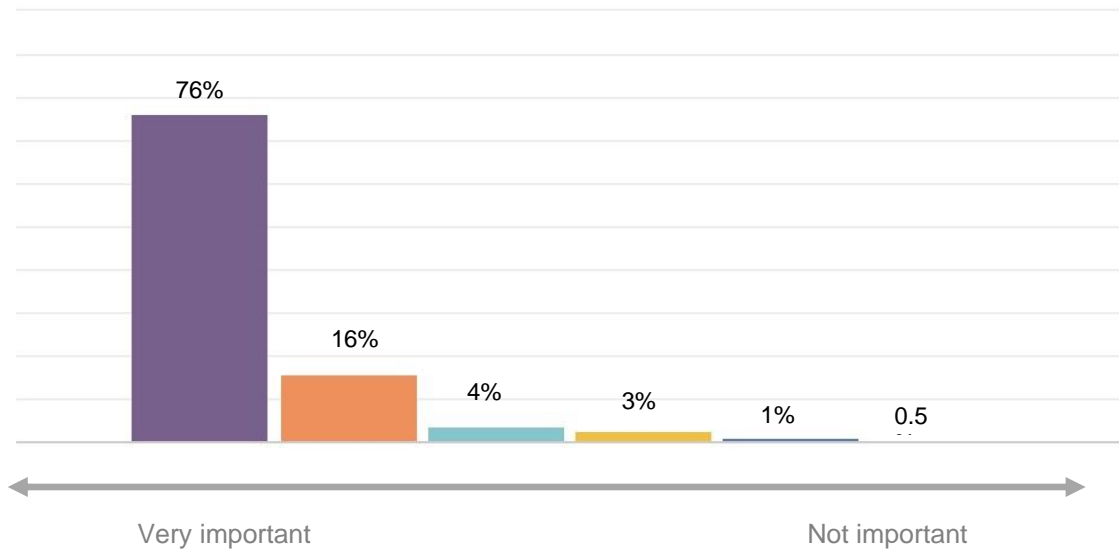
Answers ranked where 1 = not important and 6 = essential.

A total of 221 responses were received for this question and 116 (34%) gave no response.

**Figure 29** below makes it clear that a very large proportion of respondents (over 75%) believe robust legal agreements (i.e. planning obligations such as S.106 agreement) and/or conservation covenants will be essential in securing the delivery of BNG.

However, one third of the total number of respondents did not answer this question (116 individuals). This would suggest that they do not necessarily know whether legal agreements will be important and/or they do not necessarily understand the role legal agreements will play in securing delivery of BNG.

**Figure 29**  
The importance of robust legal agreements



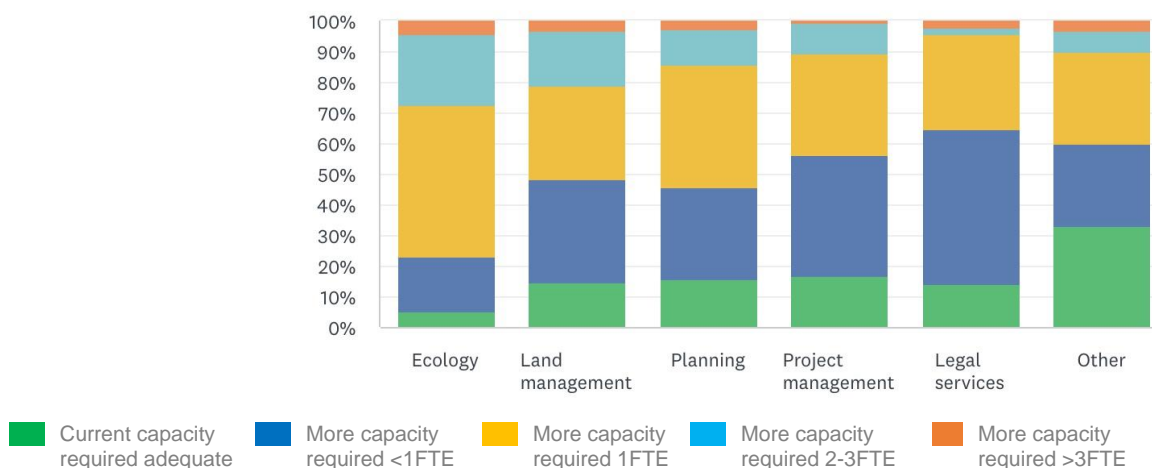
**Q30 – In terms of expertise, overall, please indicate where current staff resources will be adequate or where new staff resources will be required?**

A total of 215 responses were received for this question and 122 (36%) gave no response.

Almost half of respondents stated that more ecological expertise would be required in the form of 1 additional FTE. Likewise, a large proportion of respondents stated that additional planning expertise would also be required in the form of 1 additional FTE. The need for additional capacity in relation to legal, project management and land management tasks was also identified, but the majority of respondents felt that this requirement was less than 1 FTE.

Expertise Required	Headline Responses
Ecology	Almost half of respondents (50%) stated that more ecological capacity was required in the form of 1 additional FTE.
Legal services	Around half of respondents (51%) stated that more legal capacity was needed but less than 1 FTE. This was followed by 31% who felt that 1 FTE was needed.
Planning	40% stated that more capacity was needed in the form of 1 FTE. This was followed by 30% who stated that more capacity was needed but less than 1 FTE.
Project management	39% of respondents stated that more capacity was needed in relation to project management but less than 1 FTE. This was followed by 33% who stated that 1 FTE would be needed.
Land management	34% of respondents stated that more capacity was needed in relation to land management but less than 1 FTE. This was followed by 30% who stated that 1 FTE would be needed.
Other	30% of respondents stated that 1 FTE would be needed for 'Other' tasks.  The survey did not provide an open text box for respondents to identify what these other tasks might be.

**Figure 30**  
**Adequacy of existing staff resources for BNG**



**Q31 – What resources will be required during the transition and preparation period to ensure key areas of work as completed?** (i.e. requirement during first two years)

A total of 202 responses were received for this question and 135 (40%) gave no response.

Question 31 relates to the anticipated *transition and preparation period*, when LPAs and developers will have an opportunity to prepare for the introduction of mandatory BNG. **Figure 31a** provides a graphic illustration of what additional resources respondents believe will be required. Headline findings are presented below, and the top row (bold text) shows the aggregated overall resource requirements for this period.

It should be noted that only 3% of respondents stated that they believe that current resources are adequate. For the vast majority, additional resources would be required.

Key Activities	Headline Responses
<b>Overview Transition and preparation</b>	<b>A large proportion of respondents (41%) stated that more capacity would be needed equal to or greater than 2 FTE. This was followed by 33% who stated that 1 FTE would be required.</b>
Creation of habitat opportunity maps	The majority of respondents recognise that additional capacity is needed for this task although responses were fairly evenly spread between 0.25 FTE (26%), 0.5 FTE (28%) and 1 FTE (26%).
Preparation of the Local Nature Recovery Strategy	Most respondents (33%) stated that additional capacity in the form of 1 FTE would be required for this task followed closely by 31% who stated that 0.5 FTE would be needed.
Working with landowners and partners to identify BNG sites	Most respondents (34%) stated that additional capacity in the form of 1 FTE would be required for this task followed closely by 31% who stated that 0.5 FTE would be needed.

When examined in more detail, it becomes apparent that the additional resources required vary depending on the type of LPA the respondent works for i.e. a County Council, a District Council or a Unitary Authority. These differences are shown in **Figure 31b**.

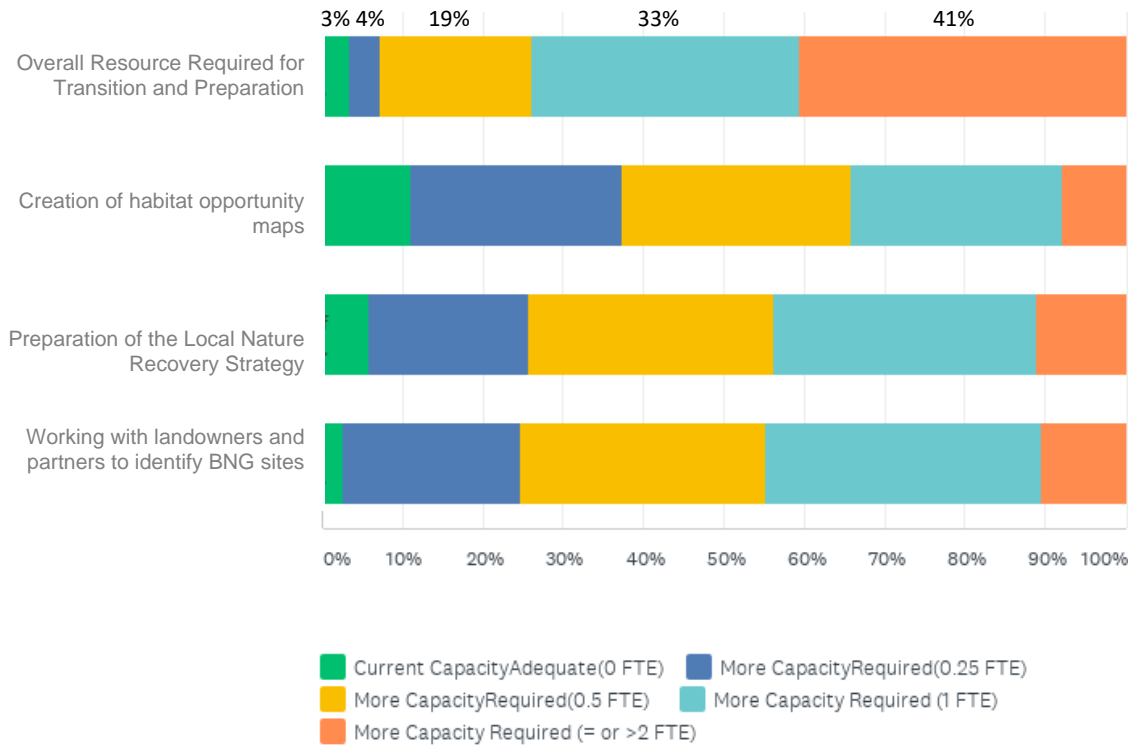
For instance, 15% of respondents from County Councils, indicated that they would need fewer than 0.25FTE additional posts, whereas less than 6% of District and Unitary Authorities believe they could manage with so little extra resource.

However, in stark contrast, nearly 50% of respondents from County Councils and Unitary Authorities, and nearly 40% of District Councils, indicated that they would need 2 or more FTE posts to achieve adequate capacity through the transition period.

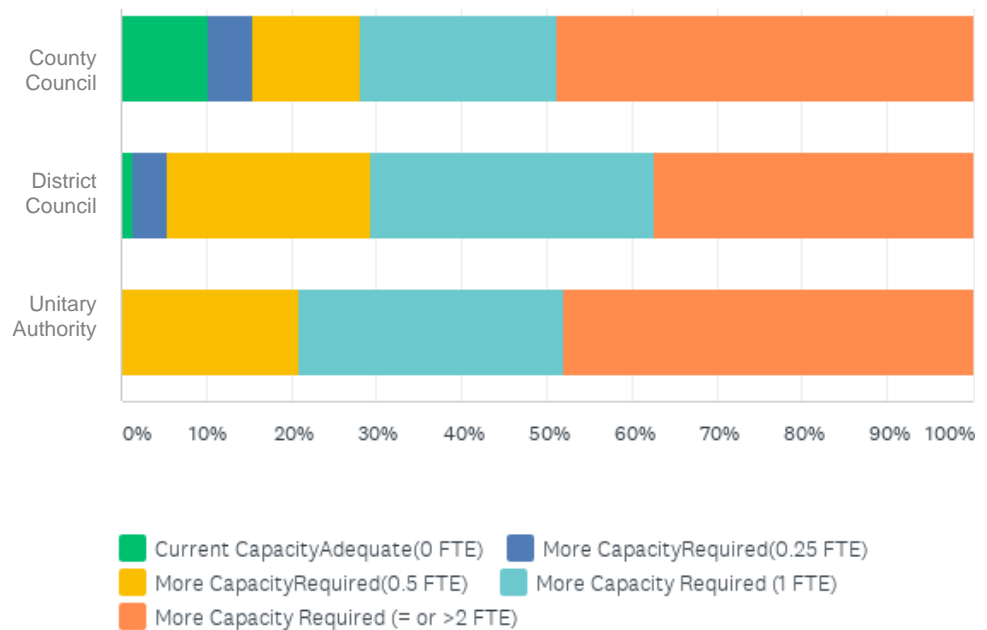
The above results may reflect the fact that County Councils are often better resourced with ecological expertise than Districts, and at the same time often provide ecological services to their district authorities.



**Figure 31a**  
**Overall results from all respondents for transition and preparation**



**Figure 31b**  
**Results based on type of LPAs for transition and preparation**



### Q32 – What resources will be required for delivery and implementation of BNG?

A total of 202 responses were received for this question and 135 (40%) gave no response.

Question 32 relates to the anticipated *delivery and implementation period* when the mandatory requirement to provide BNG will have become law. **Figure 32a** provides a graphic illustration of what additional resources respondents believe will be required. Headline findings are presented below, and the top row (bold text) shows the aggregated overall resource requirements once BNG begins to be implemented.

It should be noted that only 4% of respondents stated that they believe that current resources are adequate.

Key Activities	Headline Responses
<b>Overview Delivery and implementation</b>	<b>Almost half of respondents (50%) stated that more capacity equal to or greater than 2 FTE would be required.</b>
Input from ecology	Most respondents (45%) identified an additional resource equal to 1 FTE and 23% stated that 0.5 FTE would be needed.
Planning services	The largest proportion of respondents (31%) stated that more capacity equal to 0.5 FTE would be required followed by 29% who stated that 1 FTE would be needed.
Legal services	Most respondents (36%) stated that more capacity would be needed equal to 0.25 FTE. This was followed by 26% who stated that 0.5 FTE would be needed.
Property services	The largest proportion of respondents (30%) stated that more capacity would be needed equal to 0.25 FTE. This was followed by 28% who felt that their current capacity would be adequate.
Land management	The largest proportion of respondents (29%) stated that more capacity equivalent to 1 FTE would be needed. This was followed by 22% who stated that 0.25 FTE would be required and 20% of respondents who stated that 0.5 FTE would be needed.

When the results are examined in more detail, it becomes apparent that the additional resources required varies depending on the type of LPA the respondent works for i.e. a County Council, a District Council or a Unitary Authority. These differences are shown in **Figure 32b**.

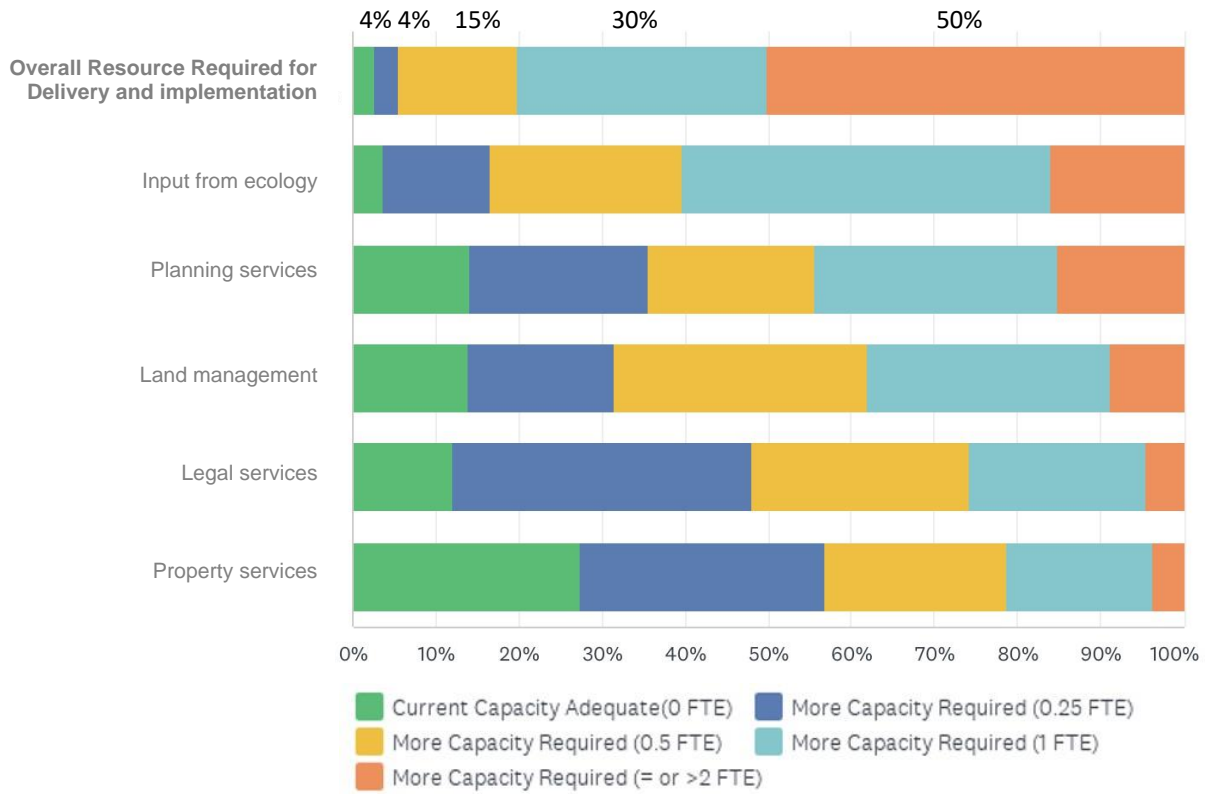
For instance, 17% of respondents from County Councils, indicated that they would need fewer than 0.25FTE additional posts, whereas less than 5% of District and Unitary Authorities believe they could manage with so little extra resource.

However, in stark contrast, 45% of respondents from County Councils indicated that they would need 2 or more FTE posts to achieve adequate capacity; and this increase to 60% for Unitary Authorities (with District Councils somewhere in between).

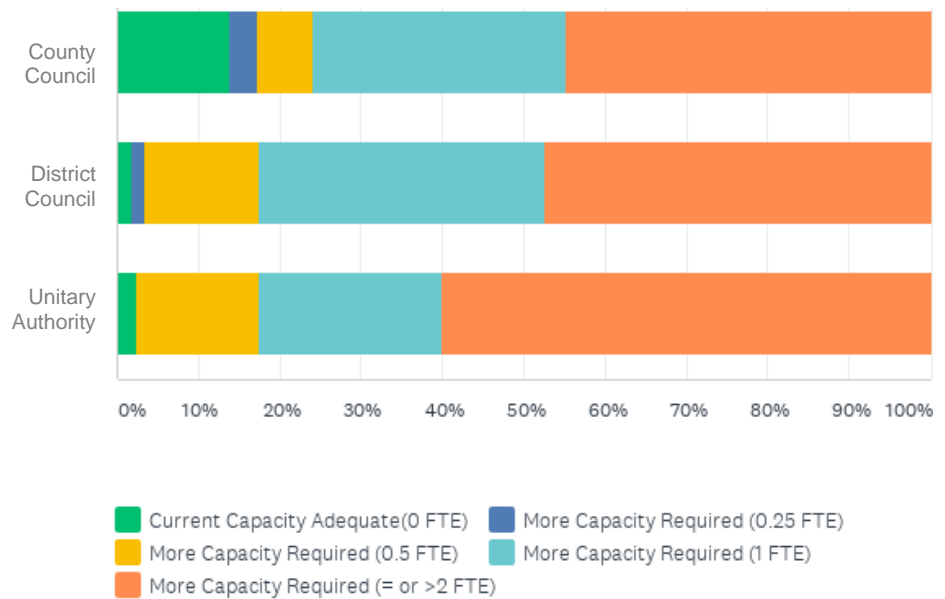
The above results may reflect the fact that some County Councils are better resourced with ecological expertise than Districts, and at the same time often provide ecological services to their district authorities.

It is also obvious that a large proportion (45-60%) of all authorities believe they will need 2 or more FTE if they are to have adequate capacity to deal with the increased workload when BNG becomes a mandatory requirement.

**Figure 32a**  
**Overall results from all respondents for delivery and implementation**



**Figure 32b**  
**Results based on type of LPAs for delivery and implementation**



### Q33 – What resources will be required for monitoring and reporting on BNG?

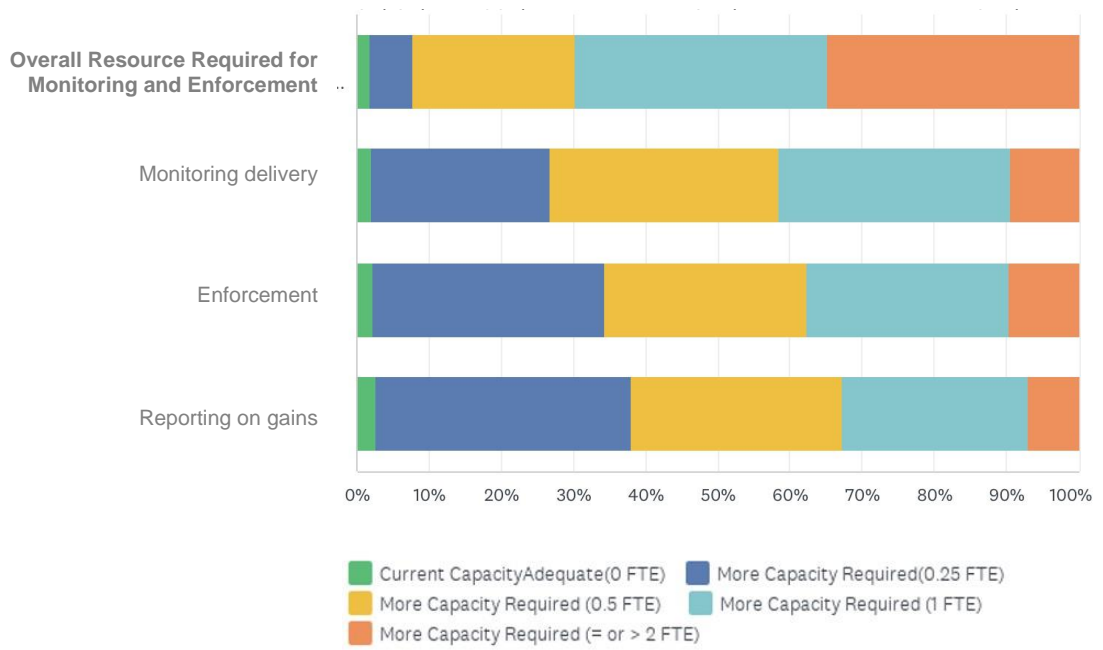
A total of 201 responses were received for this question and 136 (40%) gave no response.

Question 33 relates to the anticipated *monitoring and reporting period* once BNG is being implemented. **Figure 33a** provides a graphic illustration of what additional resources respondents believe will be required. Headline findings are presented below, and the top row (bold text) shows the aggregated overall resource requirements for monitoring and reporting.

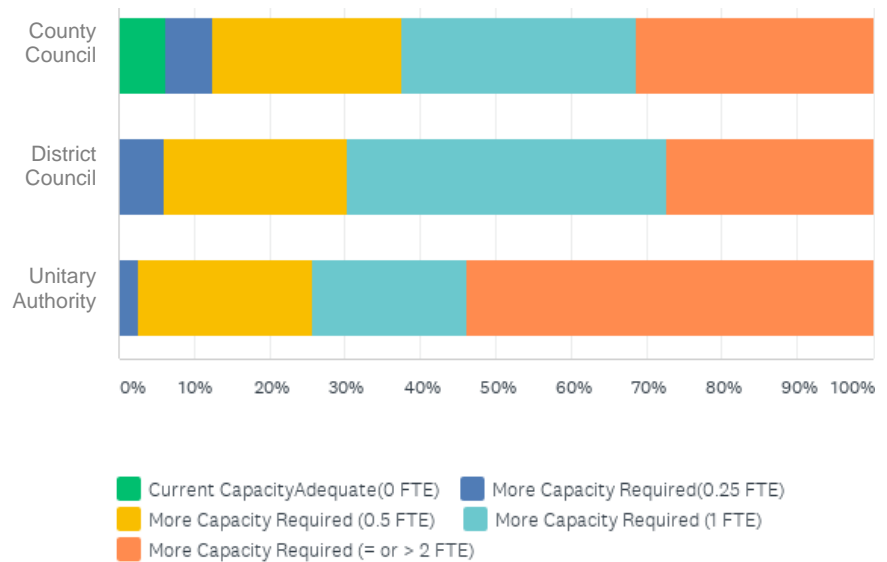
It should be noted that only 3% of respondents stated that they believe that current resources are adequate.

Key Activities	Headline Responses
<b>Overview Monitoring &amp; Enforcement</b>	<b>35% of respondents stated that more capacity equivalent to 1 FTE would be required for monitoring and reporting on BNG followed very closely by 34% who stated that 2 or more than 2 FTE would be needed.</b>
Monitoring delivery	32% of respondents stated that more capacity equivalent to 1 FTE would be required for monitoring delivery followed very closely by 32% who stated that 0.5 FTE would be needed.
Reporting on gains	Most respondents (35%) stated that more capacity equivalent to 0.25 FTE would be required for reporting on gains followed by 30% who stated that 0.5 FTE would be needed and 26% who stated that 1 FTE would be needed.
Enforcement	Most respondents (32%) stated that more capacity equivalent to 0.25 FTE would be required for enforcement. This was followed by an equal split of 28% who stated that 0.5 FTE would be needed and 28% who stated that 1 FTE would be required.

**Figure 33a**  
**Overall results from all respondents for monitoring and reporting**



**Figure 33b**  
**Results based on type of LPAs for monitoring and reporting**



**Q34 – In addition to possible new staff resources, what specialist training would you like to see provided and who do you think is best placed to deliver this?**

The above question was ‘open’ allowing a text answer (the answers are provided in full in Appendix 2).

A summary of text responses is provided below in **Table 34.1** and is based on a subjective assessment categorising the answers into common themes. A total of 77 responses were provided to this question and specialist training on the Defra Metric was the most commonly encountered request.

**Table 34.1**

Training on the <b>Defra Metric</b>	<b>24</b> respondents mentioned the Defra metric training in their answer to this question.
<b>BNG training for LPA Planners</b>	<b>21</b> respondents gave specific mention to training for planning departments/officers in their answer to this question.
Training on the <b>BNG process</b> overall	<b>19</b> respondents mentioned 'BNG' training in their answer to this question referring to the whole process.
<b>Practical implementation</b> of BNG (e.g. securing sites, legal considerations, monitoring)	<b>17</b> respondents stated that they would like to see specialist training provided for practical implementation of BNG.
<b>Other</b> e.g. training in habitat condition assessment, habitat management/creation, nature recovery strategies and digital information systems	<b>8</b> respondents provided answers falling under the 'other' category.

In terms of who would be best placed to deliver BNG training, of the 77 respondents 30 provided an answer to this part of the question. The following organisations (**Table 34.2**) were put forward by these 30 respondents. Please note that many respondents suggested more than one organisation as part of their answer. The most commonly suggested training provider was Natural England, followed by Defra.

**Table 34.2**

Natural England	<b>14</b>
Defra	<b>10</b>
CIEEM/IEMA	<b>8</b>
ALGE	<b>20</b>
Local Nature Partnerships	<b>5</b>
LPA Ecologist	<b>5</b>
Private sector (e.g. consultants/private habitat banks)	<b>4</b>
Wildlife Trusts	<b>4</b>

One respondent added that it is not only LPAs that will require training:

*“For me, it is developers and their ecologists and landscape architects that require the most training, as most of my time on BNG is critiquing the submitted reports, as they almost always state positive Net Gain but once properly evaluated, often come back as Net Loss, due to appalling and generic planting/landscaping schemes. As noted, often because these are last to be developed, so are ‘tacked on’ at the end and are often not fit for purpose”.*

### Q35 – What are your priorities for support and guidance from the Government?

The above question was ‘open’ allowing a text answer (the answers are provided in full in Appendix 3).

A summary of text responses is provided below in **Table 35.1** and is based on a subjective assessment categorising the answers into common themes.

A total of 71 responses were provided to this question and almost half of the respondents stated that increased funding would be a priority for successful delivery of BNG.

**Table 35.1**  
**Priorities for government support and guidance**

<b>Adequate funding</b> to deliver BNG	<b>35</b>
Clear <b>guidance on the BNG process</b>	<b>24</b>
<b>Guidance on practical delivery</b> (e.g. Effective information systems, Local Nature Recovery Networks, habitat registers, trading platforms, monitoring, enforcement)	<b>18</b>
<b>Training</b> on BNG	<b>15</b>

#### **Planning Reforms: potential to invalidate applications that do not provide adequate indication of BNG from the outset**

One respondent identified an issue that could be picked up through the proposed planning reforms that are currently under consideration by the government.

In order to reduce overall delays in the system, one respondent recommended that there be:

*“Clear planning structures that enable an LPA to invalidate planning applications (if necessary) that do not contain indicative/adequate BNG plans at submission; this might prevent delays down the line”.*

This respondent also suggested possible introduction of:

*“A national qualification in BNG submission for ecologists (and planners/ecologists) to demonstrate competence (can be delivered via CIEEM etc.) Guidance to developers that this must be built into the design at the start of the process”.*

**Q36 – To what extent are the following staffing issues a risk to your LPA’s ability to implement mandatory BNG?**

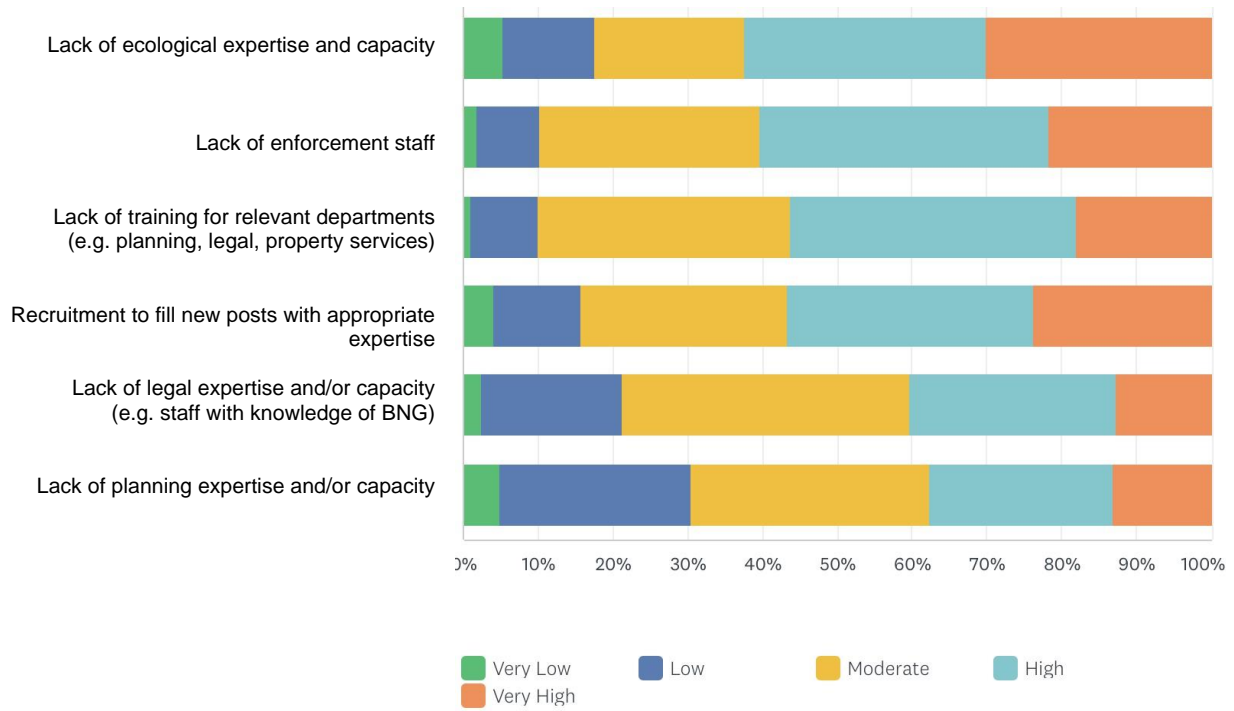
A total of 210 responses were received for this question and 127 (38%) gave no response.

The results indicate that two thirds of respondents believe lack of ecological expertise and/or capacity are either a high or very high risk to effective implementation of BNG. **Figure 36** provides a graphic illustration of how various risks are perceived by respondents and headline findings are presented below.

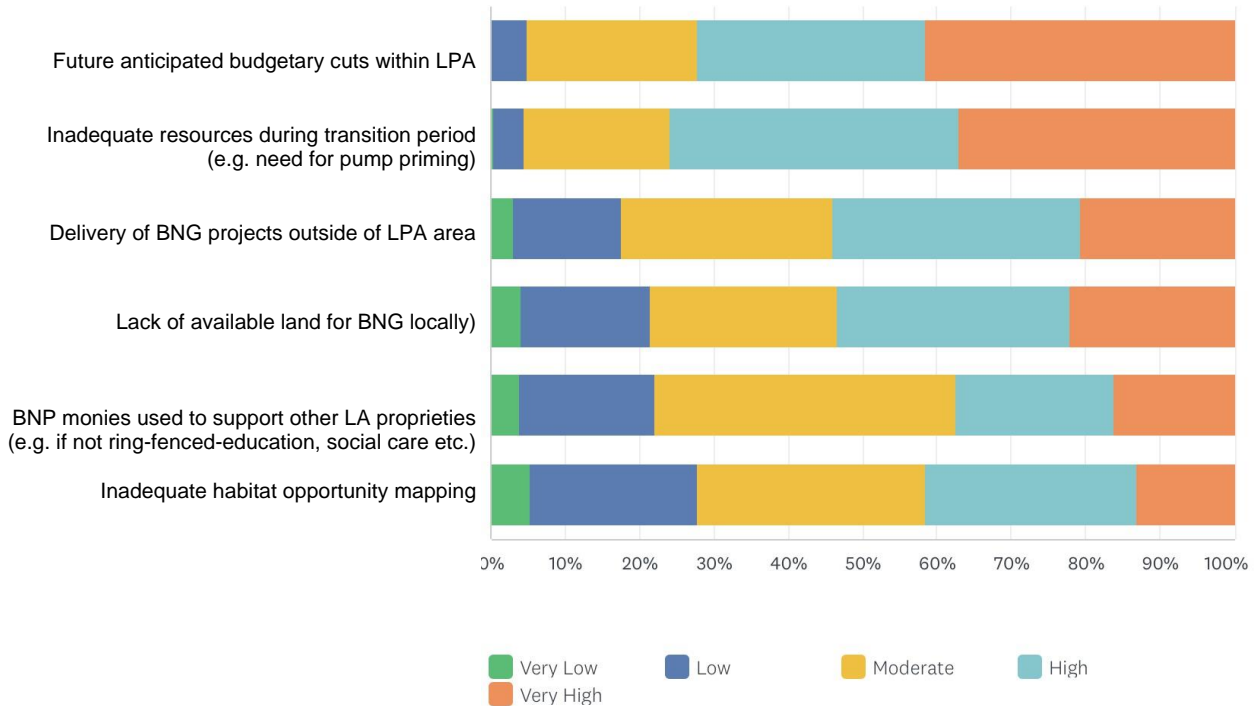
Key Risks	Headline Responses
<b>Lack of ecological expertise and/or capacity</b>	<b>32% of respondents stated that lack of ecological expertise and/or capacity was a 'high risk' in respect of BNG implementation. This was followed closely by 30% who stated that this was a 'very high risk'.</b>
<b>Lack of planning expertise and/or capacity</b>	32% of respondents stated that lack of planning expertise and/or capacity was a 'moderate' risk to BNG implementation followed by 26% who stated this was a 'low' risk and <b>24% who stated this was a 'high' risk.</b>
<b>Lack of legal expertise and/or capacity (e.g. staff with knowledge of BNG)</b>	39% of respondents stated that lack of legal expertise and/or capacity was a 'moderate' risk to BNG implementation followed by <b>27% who stated this was a 'high' risk.</b>
<b>Lack of enforcement staff</b>	<b>38% of respondents stated that lack of enforcement staff was a 'high' risk</b> to BNG implementation with 30% stating that this was a 'moderate' risk. 22% stated that this was a 'very high' risk.
<b>Lack of training for relevant LA departments (e.g. ecology, planning, legal, property services).</b>	<b>38% of respondents stated that lack of training was of 'high' risk</b> to BNG implementation with 34% stating that this was a 'moderate' risk.
<b>Recruitment to fill new posts with appropriate expertise</b>	<b>32% of respondents stated that recruitment to fill new posts with appropriate expertise was a 'high risk' to BNG implementation with 28% stating this was a 'moderate' risk. A further 24% stated that this was a 'very high' risk.</b>



**Figure 36**  
Risks to BNG implementation from staffing issues



**Figure 37**  
Risks to BNG implementation from other factors



### Q37 – To what extent are the following technical and financial issues a risk to your LPA’s ability to implement mandatory BNG?

A total of 208 responses were received for this question and 129 (38%) gave no response.

'Future anticipated budgetary cuts' is perceived as a very high risk to BNG delivery by 41% of respondents answering this question.

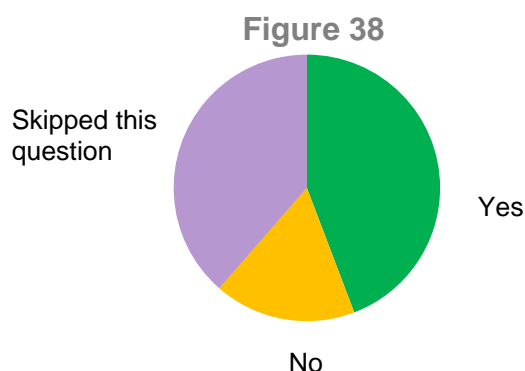
Between 31% and 41% also perceive 'inadequate resources during the transition period', 'BNG monies being used to support other LPA priorities' and 'delivery of BNG outside of LPA area' are perceived as high risks.

Key Risks	Headline Responses
<b>Future anticipated budgetary cuts within LPA</b>	<b>41% of respondents stated that this was a 'very high' risk</b> to BNG implementation with a further <b>31%</b> stating that this was a 'high' risk.
Inadequate habitat opportunity mapping	<b>31%</b> of respondents stated that this was a 'moderate' risk to BNG implementation with <b>29%</b> stating that this was a 'high' risk.
<b>Lack of available land for BNG locally</b>	<b>41%</b> of respondents stated that this was a 'moderate risk' to BNG Implementation with <b>21%</b> stating that this was a 'high risk'
<b>Inadequate resources during transition period</b> (e.g. need for pump priming)	<b>39% of respondents stated that this was a 'high' risk</b> to BNG implementation followed closely by <b>37%</b> who stated this was a 'very high' risk.
<b>BNG monies used to support other LPA priorities</b> (e.g. if not ring-fenced - education, social care etc)	<b>31% of respondents stated that this was a 'high' risk</b> to BNG implementation followed by <b>25%</b> who stated that this was a 'moderate' risk. <b>22%</b> of respondents stated that this was a 'very high' risk.
<b>Delivery of BNG projects outside of LPA area</b> (e.g. political opposition to projects not being near to the impacts).	<b>33% of respondents stated that this was a 'high' risk</b> to BNG implementation followed by <b>28%</b> who stated that this was a 'moderate' risk. <b>20%</b> of respondents stated that this was a 'very high' risk.

### Q38 – Are you happy to be contacted in the future to follow up on related issues?

A total of 208 responses were received for this question and 129 (38%) gave no response.

72% of respondents are happy to be contacted in the future to follow up on related issues. 28% of respondents would rather not be contacted. However, 129 individuals did not answer this question, so the overall proportion of respondents that are happy to be contacted in the future is shown by the green area in **Figure 38**.



## 4. DISCUSSION

### 4.1. General – Type and numbers of respondents

- 4.1.1. There was an excellent response to the survey from 192 LPAs, representing 57% of the total in England. The target audience was also very well represented and, of the total 337 respondents, 53% were planning officers and 40% were ecologists. Between a half and three quarters of respondents indicated that they would be happy to be contacted again in the future on this subject. The largest proportion of respondents (46%) work for District and City Councils, 24% for Unitary Authorities, 18% for County Councils, 11% for Metropolitan and Borough Councils and 3% for National Park Authorities.

### 4.2. Current capacity and expertise

#### In-house Ecologist and Other Sources of Expertise

- 4.2.1. Overall, based on the total number of respondents that identified (in Question 4) where they access ecological expertise, 60% indicated they do so through an 'in-house' ecologist working for their LPA. Of the remainder, approximately 30% of respondents have a Service Level Agreement with another organisation, such as with their County Council or their local Wildlife Trust.
- 4.2.2. However, analysis for authorities with access to only part-time staff is very different. In these authorities, only 37% have access to in-house expertise. For the remaining 63%, their ecological expertise is through either consultants, a shared resource with another LPA, or through a Service Level Agreement.
- 4.2.3. When asked what their preferred source of ecological advice would be, 81% of planners responded that it would be through an 'in-house' ecologist (ALGE 2013). This response appears consistent with the current survey, where planners have reported that outsourced and part-time expertise is NOT their preferred option.

#### Levels of current ecological expertise

- 4.2.4. While only 8% of those responding to this question reported that they do not currently have any access to any specialist ecological advice, 60 individuals did not respond to this question. It may therefore be the case that the total number of those taking part in the whole survey without current access is more likely to be 26% rather than only 8%. Also, if this is correct, it means that the total with access to in-house expertise drops to just under 50%.

#### Changes since the 2013 ALGE survey

- 4.2.5. In the 2013 survey of LPAs undertaken by ALGE<sup>11</sup>, approximately 33% of LPAs reported that they did not have access to ecological expertise, compared to 26% now in 2021. The latest results would therefore suggest, over the intervening period, that a larger proportion of English LPAs now have at least some form of ecological resource available to them. However, this apparent improvement in numbers of ecologists should be considered in the context of the current capacity available (see Question 5), where over 50% of respondents report that they have access to only 0.5 FTE ecologists or less. These changes may be explained by three possibilities:
- i. a larger number of ecologists are employed by LPAs, but a greater proportion are only part-time (0.5 FTE or less). In 2013, only 26% were part-time and this has now risen to 31%;
- or alternatively
- ii. there are approximately the same number of ecologists that are still working full time, but they are now shared among two or more planning authorities and so only work part-time for each;
  - iii. a combination of (i) and (ii) above.

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<sup>11</sup> ALGE (2013) Ecological Capacity and Competence in English Planning Authorities. What is Needed to Deliver Statutory Obligations for Biodiversity?

### **Is there adequate capacity in 2021?**

- 4.2.6. There is generally a very low level of capacity to scrutinise all applications likely to affect biodiversity; only 5% of respondents state their LPA has sufficient capacity to do this. Whereas 60% have indicated that their authority is only able to scrutinise some applications - but not all (see **Figure 6a**). Furthermore, 13% of all those answering this question report that they have no current capacity at all.
- 4.2.7. When asked about use of part-time staff, most respondents (80%) do not believe this provides adequate ecological resource for an LPA to adequately assess and scrutinise the current volume of planning applications received. Many also do not believe one FTE ecologist is adequate.
- 4.2.8. Only 15% of authorities are report that they are reasonably well-resourced. Unfortunately, the survey did not ask whether authorities with two or more FTE ecologists (i.e. appear to be better resourced), are in fact upper tier authorities, where this resource provides a service to a lower tier authority (e.g. through a Service Level Agreement). Where this is the case, capacity may be shared among a number of authorities. For instance, Kent County Council employs 3.1 FTE ecologists, which on the face of it would appear to provide above average capacity. However, the County Council provides ecological support to 12 other district planning authorities. When recalculated on this basis, each LPA has access to only a third of one full time equivalent ecologist.
- 4.2.9. It is also possible that some respondents have counted the same ecologists, as might be the case of different authorities in Kent who share the same ecologists.

### **Volume of applications and ecological capacity**

- 4.2.10. When the results of Question 6 (Capacity) are compared with Question 8 (Workload) there appears to be no correlation between an LPA's volume of casework and its available ecological capacity. In other words, high volumes of applications do not necessarily mean that an LPA will increase its ecological capacity by moving from part-time to full-time or increasing the total number of FTE employed.

### **Identifying likely impacts on biodiversity**

- 4.2.11. Over half (59%) of respondents rely on an in-house ecologist to identify whether an application is likely to affect biodiversity.
- 4.2.12. The national survey conducted by ALGE in 2013 established that the vast majority (90%) of planners lack any ecological qualifications and have had very little training on biodiversity issues. Consequently, they recognised that they have only basic levels of the ecological expertise required to discharge duties and national policy. They are therefore reliant upon access to professional ecological expertise, with the preferred choice being an in-house ecologist.
- 4.2.13. Only 25% of all respondents *Regularly* use Natural England's Standing Advice and 27% do so only *Occasionally*. Nearly half state that they neither regularly look at advice nor guidance.
- 4.2.14. However, the results are different for respondents working for an authority without access to any ecological resource (See **Figure 7b**). These respondents rely more heavily on their own personal judgement as well as on Natural England's Standing Advice. Surprisingly, these respondents make far less use of Registration Clerks and Validation Requirements (compare **Figures 7a and 7b**). This may suggest that these authorities do not include biodiversity as a part of their Local Validation Requirements.
- 4.2.15. The results for all respondents do show that nearly half (49%) use GIS and planning alert maps. This may suggest that IT options should be explored to see what relevant BNG information might be made available to planning authorities in electronic format, so that it is easily accessible and digestible, especially by planning officers.
- 4.2.16. Nearly a third (32%) of respondents *Regularly* use Responses from Planning Consultees to identify likely impacts, and a further third (32%) do so *Occasionally*. This would appear to indicate that planning authorities make more use of case specific responses, than they draw on Natural England's Standing Advice.

4.2.17. The overall conclusion to be drawn from the above responses is that planners make use of a wide variety of sources to assist them when making decisions on applications that affect biodiversity. There is clearly a preference for access to in-house expertise and very limited reliance on such sources as Standing Advice. This has implications for the Planning Advisory Service, which is currently looking at what BNG guidance and advice would be of most value to planners. Not only will content be important but also its format and ease of access.

#### **Experience of planning casework with some BNG**

4.2.18. The majority of respondents (see **Figures 9.1** and **9.2**) have some experience of applications where BNG is a consideration. However, it is likely that as many as 41% of all the respondents taking part in the survey have no such current experience.

4.2.19. In total, it appears that nearly 70% of planners have no experience or they spend less than a third of their time on applications that involve BNG. This would suggest that there is a need for considerable skills development within many LPAs.

#### **LPA ecologists' wider workload**

4.2.20. It is important to recognise that a large proportion of many LPA ecologists' time is not spent entirely on planning casework. For instance, ecologists report that they can spend up to a third of their time on other critical work, such as:

- habitat opportunity mapping
- Local Nature Partnerships
- management of council owned land for biodiversity purposes
- work on council-led developments
- work involving local wildlife site and networks - necessary in part to provide data for Defra's indicator: *Single Data List - Local Sites in Positive Conservation Management*<sup>12</sup>

4.2.21. Diverting current ecological resources towards BNG would mean that other key work activities would be reduced and would not receive necessary ecological input and expertise. Additionally, much of this work is actually integral to delivering BNG, such as: habitat opportunity mapping to target preferred locations for the delivery of BNG; work with Local Nature Partnerships laying the foundations for LNRS etc., and developing tariffs to secure investment in BNG on both private and council owned land.

### **4.3. Adequacy of ecological information submitted with planning applications**

#### **The adequacy of ecological information submitted**

4.3.1. Many respondents report that a substantial number of applications involving ecological issues are determined with little delay and minimal increased cost i.e. ecological information supporting these applications is adequate (see top two rows in **Figure 10**).

4.3.2. However, it also appears that a large proportion of applications do not initially provide adequate information. These are approved only after significant outstanding ecological issues have been addressed, with many often requiring pre-commencement conditions to secure necessary information and/or further mitigation. Such applications may be subject to substantial delays and/or increased costs – or worst case, may be refused planning permission.

4.3.3. Problems with inconsistency in the quality of submitted ecological information has been recognised across the ecological profession for a number of years. It has also been the focus of various workstreams initiated by CIEEM's Professional Standards Committee, often working in conjunction

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<sup>12</sup> <https://www.gov.uk/government/statistics/local-sites-in-positive-conservation-management--2>

with ALGE. Both organisations have been working hard to promote higher more consistent standards in ecological reports, and to this end have produced a new short Checklist for Ecological Impact Assessments (EcIAs)<sup>13</sup>.

- 4.3.4. The EcIA Checklist aims provide a simple and proportionate means of establishing whether an ecological report submitted with a planning application is adequate and fit for purpose e.g. to halt loss of biodiversity and to deliver a gain. ALGE and CIEEM believe that this checklist could be promoted nationally and used as part of the BNG quality assurance process and also potentially in any roll out of new national planning Validation Requirements.

#### **LPAs without ecological expertise**

- 4.3.5. Also notable are the results from LPAs with no access to ecological expertise. When filtered for responses from these authorities, the results show:
- a higher proportion of applications are granted planning consent where little or no further information or mitigation is requested
  - more applications are either withdrawn or refused as the proposals are judged to be either inadequate or contrary to planning policy.

The inference that may be drawn from these results is that these LPAs either

- i. find it harder to:
    - assess whether the ecological information submitted with an application is adequate, and subsequently
    - determine the significance of ecological effects or to identify what further information or mitigation might be required.
- or, alternatively:
- ii. apply an over precautionary approach leading to some applications being withdrawn or refused where, with ecological input from the LPA, they could be approved.

#### **The importance of ecological scrutiny on the part of the LPA**

- 4.3.6. The above results are consistent with research undertaken by Defra (Tydesley and Bradford 2012a). This study concluded that good outcomes for biodiversity are most likely to be obtained when expert ecological advice is available to the LPA and where sufficient ecological information is submitted with the application. It states:<sup>14</sup>

*“There was a good outcome in 72% of cases where internal and/or external sources of ecological advice was taken into account and only 12% judged to have poor outcomes”. And “In contrast, where no advice was received, either from internal or external sources, only 33% of cases were judged to have good outcomes, consistent with PPS9<sup>15</sup>; whereas 47% of decisions were judged to have poor outcomes”.*

*And:*<sup>16</sup>

*“Where survey and ecological reports were provided, the processing of the application tended to result in a better ecological outcome more frequently than those where no such material was provided”.*

- 4.3.7. The report to Defra (2012) found that a good outcome was identified in 80% of cases where an ecological survey and report was submitted with the application. In contrast, in 71% of the cases

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<sup>13</sup> <https://cieem.net/new-ecia-checklist-published/>

<sup>14</sup> Paragraphs 5.19 and 5.20 of the Defra report.

<sup>15</sup> Planning Policy Statement (PPS) 9 was replaced in 2012 by the National Planning Policy Statement (NPPF). The latter was then updated in 2017 and again in 2019. The later versions of the NPPF advocates very similar planning principles for biodiversity conservation but places greater emphasis on achieving biodiversity net gain.

<sup>16</sup> Paragraph 5.24 of the Defra report.

where no such information was provided, there tended to be a poor or neutral outcome for biodiversity.

- 4.3.8. The benefit of an LPA having access to ecological expertise is highlighted further where the report states<sup>17</sup>:

*“The involvement of internal ecological advisors and advice from informed organisations is probably the most critical factor in ensuring consistency with the principles of PPS 9 and the proper consideration of biodiversity issues generally, especially when engagement continues during the processing of the application”.*

- 4.3.9. The Defra report continues<sup>18</sup> that, without in-house and external expert advice:

*“Planning officers will be more likely to overlook or underestimate the significance of ecological issues and are more likely to under-implement the more positive aspects of the PPS9 Principles. Planning officers and in-house ecologists expressed the view that planning officers cannot be expected to be experts in ecological assessment of site characteristics or the likely impacts of proposals, and even more unlikely to be able to judge positive opportunities”.*

- 4.3.10. The results from this 2021 study appear to be consistent with the findings in 2012 and clearly demonstrate the need to ensure ecological expertise is adequately resourced in respect of BNG within development management.

## 4.4. Understanding and experience of BNG in planning

### **The Environment Bill - understanding of proposals for BNG and LNRs** (Question 11)

- 4.4.1. Only a very small proportion of respondents said that they had not heard of BNG and the majority reported that they have a broad understanding of what is proposed with regard to BNG becoming mandatory. Nearly 50% also have existing direct experience within their LPA of work involving BNG.
- 4.4.2. Far fewer respondents are familiar with, or are working on, *Local Nature Recovery Strategies* and the same applies to an even greater extent to *Protected Sites Strategies* and *Species Conservation Strategies*. Furthermore, 20% of respondents reported that they had not heard of the latter two strategies before completing the survey. The conclusion to be drawn here is that the role for LPAs in respect of these other aspects of the Bill are not yet obvious to most respondents.

### **Local plan policies for BNG** (Question 12)

- 4.4.3. Over half of respondents reported that they currently have no Local Plan policies relating to BNG. However, 75% did report that work to prepare such policies is underway.
- 4.4.4. Of those that do have current Local Plan BNG policies only 15% have had these policies challenged through the Examination in Public, and of these challenges only 4% have been upheld by the Planning Inspector. This would suggest that a very large proportion of BNG policies are either: sound and could be used as model policies to support those in development or to be developed; or the current low level of challenge is due to poor wider knowledge about BNG and its principles. This may change, as BNG policies become more widespread and more widely understood.

### **Existing experience of BNG in development management** (Questions 13, 14 and 15)

- 4.4.5. When asked about how much involvement they have had dealing with BNG through the development management process, at least a third, and possibly over half, of all respondents reported that they have no or very little current experience.

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<sup>17</sup> Paragraph 5.49 of the Defra report (2012).

<sup>18</sup> Paragraph 5.50 of the Defra report (2012).



- 4.4.6. When respondents were asked whether their authority currently uses a BNG metric (Q14), 20% of the 151 who answered this question reported that they have no experience in their authority of using a metric. However, this figure rises to nearly 60% if it is assumed that the 185 respondents that skipped the question did so because they have no experience of using a metric.
- 4.4.7. However, of those that are using a metric, the majority of respondents report that they use the Defra version, with a much smaller proportion using some form of modified metric.
- 4.4.8. When asked about how many planning applications have secured BNG in the last 12 months, the results, at face value, suggest that a large proportion of respondents have managed to secure BNG in at least some applications. This conclusion is, however, potentially misleading because:
- i. the results are based on a total of only 140 planning applications where BNG has been secured. When considered against the total number of those taking part in the survey (337 individuals), this means that on average each individual has managed to secure BNG on less than a half of one application over a 12-month period; and
  - ii. nearly 60% of those taking part in the survey (192 individuals) skipped this question entirely which further indicates that they majority have so far not determined any applications involving BNG.
- 4.4.9. The overall results reveal that the vast majority of those working in the planning system currently have very little, if any, regular experience of securing BNG through planning applications. This will have significant implications for how both capacity and capability can be developed within the planning system. Correspondingly, it highlights the need for the provision of high quality, consistent training that is available to large numbers of relevant LPA staff.

**Number and success at planning appeals** (Questions 17 and 18)

- 4.4.10. While only nine respondents (5%) have so far defended their decisions over BNG at a total of 12 planning appeal, in eight of these cases the planning inspector supported the LPA's decision. This would suggest that if policies are robust and adequately evidenced, LPAs should have confidence that attempts to secure BNG will be upheld at appeal.

**Existing planning guidance and BNG** (Question 20)

- 4.4.11. The results presented in Survey Monkey suggest that nearly a third of respondents to Question 20 currently have planning guidance relating to BNG and another third are in the process of preparing it (see **Figure 20a**).
- 4.4.12. However, if the results are recalculated to take account of the 110 respondents that skipped this question entirely, the true situation may be more accurately reflected in **Figure 20b**. If this is the case, nearly two thirds have no relevant local guidance and are not yet in the process of preparing any. Only 18% currently have appropriate planning guidance (e.g. SPD) that underpins policies in their local plan, although a further 21% report that they are in the process of preparing such guidance.
- 4.4.13. This again shows that the majority of planning authorities will be starting from a zero baseline, with no current expertise or guidance to draw upon.

**Current guidance not fit to Inform BNG and LNRS** (Question 21)

- 4.4.14. Out of a total of 337 people taking part in the survey, only 61 (less than 20%) answered Question 21. It would therefore not seem unreasonable to again assume that the majority of LPAs do not currently have BNG guidance of their own.
- 4.4.15. Of the 61 responses to this question, only 13 believe their guidance is fit to inform the introduction of BNG and only 10 individuals think it is fit to inform the preparation of LNRSs. A large proportion (over 30%) also said they did not know.



- 4.4.16. It would appear that there is currently very little guidance among most LPAs, and much of what does exist is not considered fit to inform the introduction of mandatory BNG.

**Priority for new BNG guidance (Question 23)**

- 4.4.17. While there was a poor response to Question 21, a total of 224 responses were received for Question 23, and of these, **80%** indicated that LPAs should attach either a ‘*very high*’ or ‘*high*’ priority to preparation of local guidance for the introduction of BNG.

**Leadership over Local Nature Recovery Strategies (Question 22)**

- 4.4.18. Only 89 individuals answered Question 22, seeking to find out who might be best placed to take the lead to develop LNRSSs, suggesting that most people again did not know enough to respond.
- 4.4.19. Of those that did answer this question, the following results highlight the variation that exists over which organisation is believed to be best placed to lead with the preparation of LNRSSs:

<b>Organisation</b>	<b>% of Respondents</b>
Local Nature Partnership	36%
Their own LPA	27%
Higher-tier LPA (e.g. County Council)	25%

- 4.4.20. While the results may reflect uncertainty among respondents as to which is the best option, the results may also indicate a reality where no ‘one size’ will fit all situations and or local authorities.

**High importance attached to legal agreements to secure BNG (Question 29)**

- 4.4.21. A total of 220 respondents responded (see Question 29) to indicate the importance that they attach to legal agreement or covenants when securing the delivery of BNG. Of those answering this question, 15% believe such agreements will be ‘*very important*’ and 75% think they will be ‘*essential*’.
- 4.4.22. However, since 116 individuals skipped this question, it also appears that a large proportion of those taking part in the survey may not understand the importance or role that legal agreements and/or covenants are likely to play when securing BNG.

**Access and use of ecological data**

- 4.4.23. It would appear that the majority of LPAs are well placed to obtain relevant information (baseline habitat and species data) to inform planning for BNG from their Local Record Centre (LRC). For instance:

- 66% have a Service Level Agreement (SLA) with their LRC and access to all data sets.
- 16% have an SLA but only have access to certain data sets e.g. local wildlife sites.

However:

- 6% access data only when they need it and are charged for each enquiry.
- 10% of respondents rarely use their LRC to access ecological data.
- Only 3% of respondents state that they do not have a Local Biological Records Centre for their LPA area.

**Information to inform decisions over BNG**

- 4.4.24. When asked what information they might require to inform their planning for BNG, over 80% indicated that access to baseline habitat and species data will be very important. Deciding how to access such data should therefore become a priority for those LPAs that currently do not have SLAs with their local record centre (see section 4.4.21 above). It is encouraging that a large proportion of respondents also attach very high importance to information on possible/likely providers of land that may be available locally for delivery of BNG.

4.4.25. Finally, while still important, the information submitted by applicants is seen as slightly less useful than either baseline habitat data or information on local BNG providers.

#### **Preferred options for securing land for BNG**

4.4.26. When asked what their preference is for identifying and securing land for BNG, respondents would appear to favour land that is either in local authority ownership or under the ownership/control of the Local Nature Partnership. However, working with local landowners in a similar way to that used in the Strategic Housing Land Availability Assessment (SHLAA), to identify and bring forward suitable land for BNG, was also considered favourably.

4.4.27. There may be several reasons why local authority land may be preferred:

- The land and therefore the BNG is more easily secured and controlled by the authority; it therefore avoids the need for landowner agreements and funding payments. Essentially it is an “easier” option.
- It also enables investment in and enhancement of the authority’s land that may otherwise have not been possible before without developer contributions to achieve a net gain.

4.4.28. However, in most circumstances, local authority land should not simply be targeted because it is the easiest ‘quick win’. To be truly effective in reversing the nationwide decline of biodiversity, net gain should normally be targeted where the best ecological outcomes can be expected, and which are consistent with local biodiversity priorities – i.e. set out in the LNRS. On the other hand, urban authorities in particular may wish to enhance their greenspaces where it is most accessible to large numbers of local residents. Again, no ‘one size’ approach will fit all.

4.4.29. Finally, with regard to other preferences for securing land for BNG, working with national and local commercial BNG operators that are independent to the Council were the two least favoured options.

4.4.30. This apparent reluctance may be attributed to the fact that very few LPAs have experience of commercial operators, although one might expect this to increase once mandatory BNG has been introduced. This somewhat negative attitude to commercial operators may indicate a need for clear and consistent standards to be introduced for these operators so that local authorities can have confidence when relying on them to actually deliver net gains.

## **4.5. Need for increased capacity and expertise**

#### **Adequacy of current capacity and expertise to introduce BNG**

4.5.1. **Question 24** sought to identify whether current resources are adequate to assess whether an application will need to deliver BNG. This question is closely aligned to the findings presented in Section 4.2 on capacity and expertise, and in Section 4.3 on the adequacy of information submitted with planning applications.

4.5.2. Less than 10% of respondents reported that their current expertise and resources will be adequate to deliver BNG. A quarter of respondents believe they would only be able to address an increased BNG workload if other council activities that also require ecological input is reduced.

4.5.3. However, one of the key findings from the overall survey is that the majority of respondents have reported that their **current resource, capacity and expertise is not adequate to deal with their existing planning workload, let alone any increase required to address additional work on BNG. This is a consistent message from all types of authority and from all regions of England.**

#### **Personal expertise (Question 25)**

4.5.4. The results for Question 25 indicate that there is a large variation in both the experience and capability among respondents when asked whether they are confident and expert when dealing with BNG issues. However, **Figure 25** shows graphically that the majority of individuals would not

yet consider themselves particularly capable of handling any of the activities necessary to deliver BNG, such as:

- Use of the Biodiversity metric
- Identifying local BNG receptor sites (habitat opportunity mapping)
- How to interpret the robustness of ecological reports and BNG proposals
- Identifying and using planning/legal mechanisms to secure BNG
- Negotiating with applicants over adequate proposals
- Negotiating with landowners over site provision

4.5.5. The overall pattern that seems to emerge from these results is not surprising. BNG is currently not mandatory, and only a minority of LPAs have started to develop any expertise in this area of work. For most respondents, this means that they may have some knowledge about some aspects of what is required, but very few have been sufficiently involved over a long enough period to have developed what might be call expertise. For instance, ecologists with Kent County Council report that that they understand the principles of BNG but have had little opportunity to put their knowledge into practice through regular case work.

**Resources for the delivery of BNG: preparation, implementation and monitoring**

4.5.6. Defra has identified three phases, or workstreams, for the delivery of BNG:

- |  |                                       |
|--|---------------------------------------|
| 1. The Transition & Preparation Period | When LPAs will prepare for BNG        |
| 2. Implementation                      | When applications must deliver BNG    |
| 3. Monitoring and Reporting            | When LPAs will report on BNG achieved |

4.5.7. It is worth noting that Implementation workstream will not “end” in the same way that the transition period will finish. As a mandatory requirement, Implementation will come online after the transition period and then continue indefinitely. Also, while preparation for Monitoring and Reporting are considered separately in this survey, these activities may eventually become a closer part of Implementation as developments/projects “mature”. In which case, Monitoring and Reporting will cease to be a stand-alone activity and will become a workstream that integrates into Implementation. However, monitoring and reporting on BNG may become integrated into wider environmental reporting required of local authorities.

**Table 4.5**  
**Summary of Overall Additional Resources Required During Each Workstream for BNG**

Workstream for BNG Rollout	Current Resource Adequate	Additional Staff Resource Required <i>Expressed as Full-time Equivalent</i>			
		<0.5 FTE	0.5 FTE	1.0 FTE	2+ FTE
<b>Transition and Preparation</b>	<b>3%</b>	<b>4%</b>	<b>19%</b>	<b>33%</b>	<b>41%</b>
<b>Implementation</b>	<b>4%</b>	<b>4%</b>	<b>15%</b>	<b>30%</b>	<b>50%</b>
<b>Monitoring and Reporting</b>	<b>3%</b>	<b>9%</b>	<b>23%</b>	<b>35%</b>	<b>34%</b>

## Comparison between LPAs with and without experience of BNG

- 4.5.8. While not included in the original scope of this study, a further brief analysis was made to determine if there are any apparent differences in additional resource expectations between LPAs with experience of BNG, compared to those with no experience. To do this, respondents who reported that they had: no BNG planning policies (Q12), no experience of securing BNG through planning applications (Q13) and/or do not use a biodiversity metric (Q14), were subject to further analysis. The answers to Questions 31, 32 and 33 from these respondents (with no BNG experience) were then compared with the overall results.
- 4.5.9. While there was some variation in the results, this brief analysis did not identify any conclusive or consistent pattern of differences. Generally speaking, while the percentage figures varied slightly, the relative proportions for 0.25, 0.5, 1 and 2 or more FTE posts remained much the same as the overall figures, even when respondents reported they had no BNG policy, development management or BNG metric experience. It would therefore require more detailed analysis to establish if those with no BNG experience are likely to need either 'more' or 'less' future staff resource than those with current experience i.e. they either over or under estimated what will be required.
- 4.5.10. For the purposes of this report, it is therefore concluded that the data in **Table 4.5** (and in the accompanying details in Sections 4.5.15. to 4.5.20. below), provides a valuable overall indicator of resources needs as expressed by all the respondents.
- 4.5.11. **Questions 30 to 33** sought to identify what, if any, additional resources will be required by LPAs for each of the workstreams phases described above. **Table 4.5** provides an overall summary of the findings for each of the three workstreams and shows the proportion (%) of respondents and their estimation of the additional staff resource that will be required (expressed as Full-time Equivalents FTE). These figures are taken from the top row of **Figures 31, 32 and 33**.

### A corporate multi-disciplinary responsibility

- 4.5.12. What emerges from the answers to **Question 30** is that delivery of BNG must be tackled as a multi-disciplinary corporate endeavour on the part of LPAs, with 85% of respondents stating that they will require additional professional staff to support this new responsibility.
- 4.5.13. This additional staff resource will be required for not only greater ecological capacity, but also for other disciplines. For instance:
- almost half of respondents stated that more ecological expertise would be required in the form of 1 additional FTE; and
  - a large proportion of respondents stated that additional planning expertise would also be required in the form of 1 additional FTE.
  - additional capacity for legal, project management and land management tasks was also identified, but the majority of respondents felt that this requirement was less than 1 FTE.

### Coordination by an experienced environmental planner

- 4.5.14. A senior environmental manager in an LPA with experience of both BNG policy and delivery, made a strong case for local authorities to have an environmental planner in post. This position could coordinate the input from various other specialists within the council, as well as coordinating the delivery of BNG with wider environmental initiatives, such as nature-based solutions, climate mitigation, greenspace management, flood resilience and people's access to nature.

### Resources required for the transition and preparation period

- 4.5.15. For this early transition phase, respondents were asked what resources would be required to help them prepare for:
- Creation of habitat opportunity maps
  - Preparation of the Local Nature Recovery Strategy

- Working with landowners and partners to identify BNG sites
- 4.5.16. The Summary of responses for this workstream indicate that the majority of respondents (41%) estimate that more capacity would, overall, be needed equal to or greater than 2 FTE. This was followed by 33% who stated that 1 FTE would be required. This additional resource would be a mix of disciplines as identified in paragraph 4.5.10 above.

#### **Resources required for the implementation workstream**

4.5.17. For this workstream, respondents were asked what resources would be required in relation to:

- Ecology
- Planning services
- Legal services
- Property services
- Land management

4.5.18. The Summary of responses for this workstream indicates that almost half of respondents (50%) estimate that more capacity equal to or greater than 2 FTE would be required.

#### **Resources required for monitoring and reporting workstream**

For this workstream, respondents were asked what resources would be required for:

- Monitoring delivery of BNG
- Reporting on gains that have been secured
- Enforcement where necessary delivery has not been achieved

4.5.19. The Summary of responses for this workstream indicates that a third (35%) of respondents estimate that more capacity equivalent to 1 FTE would be required for monitoring and reporting on BNG, and another third (34%) of respondents estimate that their LPA would require 2 or more than 2 FTE additional staff.

4.5.20. The additional staff resources required for Implementation and for Monitoring and Reporting would be a mix of disciplines spread across the five categories shown in 4.5.14.

#### **Variation in detailed results depending on BNG activity and type of local authority**

4.5.21. The summary of responses provided above for the three workstreams provides a useful overall guide to additional resource requirements. The results also show that the additional resource required differs among different respondents; some think they may need only 0.5 FTE additional resources, while other believe they will need 1 or 2 or more than 2 FTE posts.

4.5.22. There is some evidence in the results to indicate that this variation may be dependent upon the type of planning authority i.e. between County, District, Unitary and Borough Authorities (see variation in **Figures 31b, 32b and 33b**). For instance, for the Transition period, nobody from a Unitary Authority thought they would have adequate resources, whereas 10% of respondents from County Councils believe they do have adequate resource to prepare for the introduction of BNG. In contrast, when compared to both County and Unitary Authorities, a smaller proportion of District Councils believe they would need 2 or more FTE posts to achieve adequate readiness.

4.5.23. However, it has not been possible within the scope of this piece of work to tease apart whether there are further significant differences in additional capacity or expertise among different types of planning authority. It is, however, probably safe to conclude that the range of different responses reflect:

- i. An individual's own experience of BNG and whether or not they fully understand the resource implications necessary to implement BNG i.e. those with little experience may underestimate what is required; and
- ii. The starting position of their respective authorities i.e. the current readiness of their authority, the current staff resource available for work on BNG and the stage of preparation they have already reached.

4.5.24. For instance, some authorities:

- have access currently to greater ecological expertise and capacity
- have greater capacity with other necessary professionals e.g. planners and lawyers
- have completed or made a start with habitat opportunity mapping
- have or are preparing local plan policies for BNG
- have or are preparing biodiversity planning guidance
- have experience of determining planning applications where BNG has been secured
- have mechanisms locally to deliver BNG through local partnerships and landowners

4.5.25. As a general observation, many County Councils seem to be better resourced and more advanced in their preparation than their District or Unitary counterparts. There are, however, District, Unitary and Metropolitan Authorities that are also better prepared and resourced than many of their counterparts. The situation is certainly not uniform around England, but hopefully those authorities that are further down road will be able to share their experiences to assist those that are just starting to prepare.

4.5.26. Another consideration is that some County Councils provide an ecological service through a Service Level Agreement to their District Councils. Current capacity within this service may or may not be adequate, but it is unlikely that most Counties would be able to meet the increased demand if they had to provide a full BNG service for all of their Districts. As an example, Kent County Council reports that its ecologists are able to provide a very limited ecological resource for some of its districts; this is as little as seven hours per month for some.

#### **Targeting additional resources based on type of LPA**

4.5.27. It was outside the scope of this current study to examine in detail how additional resources might be targeted based on the type of LPA involved.

4.5.28. The results indicate, however, that a 'one size fits all' response to the need for additional resources would not necessarily be most cost effective. There may be benefit in undertaking further analysis to match additional resources to some of the key variables, such as the level of new development planned for an authority's area, since greater area (in hectares) of development might correlate with a greater need in the amount of BNG units to be delivered.

4.5.29. The likely volume of planning case work may therefore be an important factor when considering the allocation of additional resources, while also recognising the variation that exists between LPAs and their current state of readiness to introduce BNG.

4.5.30. However, in deciding on where to target resources, it must also be recognised that the government may wish to address other socio-economic variables, such as disparities between different English regions.

4.5.31. Hopefully, however, targeting will ensure that for those authorities dealing with a large number of applications likely to impact biodiversity, they will be provided with increased and adequate capacity to ensure there are able to implement and achieve truly effective BNG.

4.5.32. Targeting may be especially important when identifying and providing new training on BNG for LPAs and also on other additional support that the government may be able to offer.

#### **Specialist training on BNG**

4.5.33. The answers received for **Question 25** indicate that a large proportion of respondents do not have more than a basic knowledge of most areas of work that will be required to roll out BNG. This overall limited experience applies to:

- Basic understanding of BNG requirements
- Use of the biodiversity metric
- Identifying local BNG receptor sites (habitat opportunity mapping)

- How to interpret the robustness of ecological reports and BNG proposals
  - Identifying and using planning/legal mechanisms to secure BNG
  - Negotiating with applicants over inadequate proposals
  - Negotiating with landowners over site provision.
- 4.5.34. These results reveal the need for a considerable degree of ‘upskilling’ to occur before LPA staff are likely to feel capable and confident in any of the above activities.
- 4.5.35. In addition, the survey contained an open text question (**Question 34**) asking respondents to identify their own priorities for training relating to BNG. It is perhaps noteworthy that only 22% (77 individuals) taking the survey answered this question and the majority that skipped this question may have done so because of their limited understanding of what is proposed.
- 4.5.36. The training priorities identified by respondents through the survey have been grouped into the following categories:
- Training on Defra/Natural England metric
  - BNG training for planners
  - Training on the BNG process
  - Training to inform practical implementation e.g. securing sites, legal considerations and biodiversity monitoring
  - Other - including habitat management/creation LNRs and digital information systems
- 4.5.37. Given the seeming lack of experience in BNG activities (**Questions 13-18 and 25**), it is surprising that more respondents did not indicate that they would wish to see training on other areas of work identified in 4.5.30 above; in particular:
- Interpreting and assessing BNG proposals
  - Negotiating with applicants to secure adequate gains (e.g. 10% or more)
  - Identifying and securing land for BNG
  - Securing net gain through planning and legal services
- 4.5.38. There are several possible reasons why there wasn’t a greater response in the survey around needs. For instance:
- Those who have no experience of BNG yet may not appreciate the need to understand and scrutinise the metric calculations provided by applicants.
  - The majority of those taking part in the survey (nearly 80%) did not provide any thoughts on training requirements, which is probably a reflection of how little they know about the process; this is best summed up as: “*they don’t know what they don’t know*” and therefore don’t know what they need to know and learn i.e. from additional training.
- 4.5.39. However, if planners have access to ecological expertise, there is also an argument that they need only have an understanding of how the metric operates. They don’t, therefore, need to know how to actually calculate losses and gains. It is probably more important that training targeted at planners emphasises that their specific role in the process AND that makes clear to them that there is a risk if an LPA simply accepts metric calculations from applicants without the expertise to scrutinise the reliability of what has been submitted. ALGE members report that the metric can be wrongly applied leading to the generation of spurious results over both losses and gains.
- 4.5.40. While only a limited number of respondents identified training requirements, the overall results confirm a need to ensure there is easy access to relevant training, and that this needs to be targeted at different types of activities and staff.

#### **Additional training topics**

- 4.5.41. The authors of this report also believe that both guidance and training should be prepared nationally to demonstrate when and how enforcement action should be taken in relation to BNG projects i.e. what circumstances would warrant enforcement intervention and what intervention would be appropriate.

- 4.5.42. Respondents also identified the need to ensure ecological and planning consultants are also able to access appropriate training so that the BNG evidence base and calculations being submitted with planning applications is of a high standard. This would ensure that time is not wasted dealing with inadequate, incomplete and inaccurate assessments of BNG in support of an application.

#### **Training providers**

- 4.5.43. Only 30 respondents indicated any preference for which organisation would be suitable as training providers for BNG. These are shown below, with the most favoured at the top of the list and the least at the bottom:

- Natural England
- Defra
- CIEEM and IEMA
- ALGE
- Local Nature Partnerships
- LPA ecologists
- Private sector providers and wildlife trusts

#### **Priorities for government support and guidance**

- 4.5.44. The survey contained an open text question asking respondents to identify what additional support they would like to see from the government. Again, the majority of respondents skipped this question, with only 71 providing an answer.
- 4.5.45. Not surprisingly, half of the respondents stated that additional funding would be a priority for them. A third would like to see clear guidance on the BNG process, while a quarter wished to see guidance on issues around practical delivery, such as:

- effective information systems
- Local Nature Recovery Networks
- habitat registers
- trading platforms
- monitoring
- enforcement

- 4.5.46. Following ALGE's consultation with its members to inform the Competency Profile and Capacity Framework (see Section 2.6), it is viewed as very important that BNG is incorporated adequately into DLUHC's proposed Planning Reforms. In particular, in order to avoid delays in the system, it is recommended that BNG be added as a formal requirement in the national list of Validation Requirements. This would enable an LPA to invalidate planning applications (if necessary) where the applicant has not clearly provided adequate proposals for BNG as part of their initial planning application.

NOTE: if what constitutes '*adequate proposals for BNG*' is clearly defined, this would appear to be a simple way for planning reforms to incorporate BNG into the heart of the planning process from the outset.

## **4.6. Perceived risks to the effective introduction of BNG**

- 4.6.1. Those participating in the survey were asked to identify what they thought were the greatest risks to an LPA's ability to implement BNG. The results are shown in **Figures 36** and **37**.
- 4.6.2. **Expertise and capacity:** Lack of ecological expertise was identified by nearly a third of respondents as being a '*very high risk*' to the implementation of BNG, with another third identifying this as a '*high risk*'. A quarter of respondents also thought that lack of planning capacity and expertise and lack of legal expertise were high risks. However, an even higher proportion (38%) thought that lack of enforcement staff was a high risk. The latter perceived need for enforcement would suggest that respondents anticipate that delivery and implementation may not be totally effective without both 'stick and carrot' approaches. Linked to this will be the need to ensure that



resources for BNG are not only made available by developers at the outset for capital works, but are sustained for the longer-term maintenance and management periods.

- 4.6.3. **Staff training and recruitment:** Lack of training for relevant LPA departments is seen by 38% of the respondents as a *'high risk'*; another 34% believe it will be a *'moderate risk'*. The potential to recruit new staff in sufficient numbers and with the necessary skills and experience to introduce and implement BNG is judged by a third of respondents (32%) to be a *'high risk'*, and 24% think it is a *'very high risk'*.
- 4.6.4. **Uncertainty over funding:** One of the greatest risks to an LPA's ability to implement BNG is judged to be future budgetary cuts in local authority funding. 41% of respondents believe this is a *'very high risk'* and another 31% think it is a *'high risk'*. Uncertainty and concern over future funding and budget cuts is probably the reason why respondents fear that BNG monies would be used to support other LPA priorities and therefore not used to secure net gain in biodiversity. 31% of respondents indicated that this is a *'high risk'* and 22% believe it is a *'very high risk'*.
- 4.6.5. **Available land for BNG:** Like future budgetary cuts, lack of available land for BNG is also another serious threat that is judged by 41% as being *'very high risk'* and by 21% as *'high risk'*.
- 4.6.6. **Preparation and transition:** Inadequate Resources During the Transition and Preparation Period is potentially the greatest risk of all to effective rollout of BNG. Over a third (37%) of respondents believe this is a *'very high risk'* and an even larger proportion (39%) think it may be a *'high risk'*. Also, inadequate habitat opportunity mapping is perceived by 29% as a *'high risk'*, and a further 31% judge it as a *'moderate risk'*.
- 4.6.7. **Delivery of BNG outside of the LPA's area:** There is also considerable concern over the potential Delivery of BNG projects outside of the LPA area i.e. not delivered where the original impact (loss of biodiversity) is experienced. 20% of respondents see this as a *'very high risk'*, another 33% see it as *'high'* and 28% believe it is a *'moderate risk'*.

#### **Response to risks**

- 4.6.8. How the above risks may be avoided and minimised is discussed in Section 5, which provides a number of recommendations based on the results of the survey.
- 4.6.9. There is clearly considerable concern among a large proportion of LPA staff about a broad range of the risks that may threaten the effective introduction of mandatory BNG. If these risks are to be avoided or minimised then local authorities will require not only additional resources to address the increased burden on their services, but also early notification of the actions that need to be taken and the new processes and mechanisms that need to be introduced into their planning functions. Local authorities will also need an adequate lead in time to ensure they are able to recruit new staff to support the new work streams.

## 5. RECOMMENDATIONS

### 5.1. Background to recommendations

- 5.1.1. One of the key findings from the survey is that the majority of respondents have reported that their **current resource, capacity and expertise is not adequate to deal with their existing planning workload, let alone any increase required to address additional work on BNG.**
- 5.1.2. This lack of overall capability is of concern to a large proportion of LPA staff and is the basis for a broad range of risks that may threaten the effective introduction of mandatory BNG. If these risks are to be avoided, or at least minimised, then local authorities will require:
- Expertise and skills necessary to deal with the ecological, planning, legal and project management elements of BNG
  - Additional and appropriate resources to address the increased burden on their services
  - Early notification of the council-wide actions that need to be planned for and taken
  - Time to identify and introduce new processes and mechanisms into their planning functions
  - Adequate lead in time to ensure they are able to recruit new staff to support the new BNG work streams.
- 5.1.3. The following section provides a series of recommendations that are intended to not only address the perceived risks but to support the effective introduction of mandatory BNG into the planning system in England. As such, the recommendations will be relevant to a number of organisations and not simply to central government.

### 5.2. Recommendations

#### **Identify clear responsibilities as soon as possible**

- R.1. Local authorities should be given very clear direction over their new responsibilities for BNG and for their role in the preparation of Local Nature Recovery Networks.
- R.2. BNG should be delivered and coordinated as part of the wider process of green recovery, nature-based solutions, greenspace management and making nature more accessible to a larger proportion of the population. An environmental planner might be well suited to this over-arching role.
- R.3. BNG should be promoted to local authorities as a council-wide, multi-disciplinary endeavour that involves staff from different departments.

#### **Implementation of BNG should be adequately resourced**

- R.4. Preparation for and implementation of BNG should be adequately resourced, meaning:
- i. an increase in **capacity** (an increase in necessary staff); and
  - ii. development of **expertise** (through appropriate training and guidance).
- R.5. Additional and appropriate resources should therefore be made available to LPAs to bridge the gap between the existing situation and what will be required to roll out BNG effectively when it becomes a mandatory requirement.
- R.6. Local authorities should be discouraged, in the strongest means possible, from redirecting monies secured for BNG towards other council priorities or funding gaps which are not related to BNG.
- R.7. BNG should be introduced into the work of LPAs without the risk that resources will then no longer be available to support other local authority initiatives and projects that also require ecological expertise, such as LNRs, greenspace management and design input into Council projects.

### **Incorporate good biodiversity practice into planning reforms**

- R.8. Make explicit how BNG is expected to operate within the context of planning reforms.
- R.9. Additional resources should be sufficient to ensure there is adequate expert ecological scrutiny of planning applications to determine and ensure that proposed gains are proportionate to the predicted losses (impacts).
- R.10. Defra and DLUHC should consider how the new short *Checklist for Ecological Impact Assessments* (EclAs), that has been prepared by the ALGE and the CIEEM, might be used as part of a BNG quality assurance process and also potentially in the Validation Process (see R14 below).
- R.11. Since the Environment Bill proposes that all relevant planning applications must submit a BNG plan, DLUHC should consider the introduction of a specific requirement in the list of National Validation Requirements that relates to the provision of a BNG plan with all relevant planning applications. This would easily enable planning authorities to invalidate applications without such a plan.

### **Provide tailored training and guidance on BNG**

- R.12. Training should be prioritised towards those topic areas that will be of most benefit to the widest group of professionals, such as:
- Interpreting and assessing BNG proposals
  - Negotiating with applicants to secure adequate gains (e.g. 10% or more)
  - Negotiating with landowners and third parties to secure appropriate sites for BNG delivery
  - Identifying and securing land for BNG
  - Securing net gain through planning and legal services
- R.13. Both the ALGE survey in 2013, and the results collected in this survey, indicate that there have been poor levels of uptake by planners currently of Natural England's Standing Advice. This would suggest that any new national planning guidance for LPAs on BNG should be prepared carefully so that it is fit for the intended audience and the uses to which it will be put.
- R.14. Appropriate and proportionate training and guidance should also be made available for professionals involved in the design and preparation of new developments and planning applications – as might be provided/commissioned by professional and industry bodies involved with planning, design and development.
- R.15. Guidance and training should be prepared nationally to demonstrate when and how enforcement action should be taken in relation to BNG projects i.e. what circumstances would warrant enforcement intervention and what intervention would be appropriate.

### **Share good existing practice**

- R.16. Guidance should make it clear that there will be different 'models' by which local authorities can deliver net gain, and different models will suit some authorities more than others, depending on their local circumstances. No one size 'approach' will fit all.
- R.17. Close collaboration should continue between the partners in this project and the Planning Advisory Service (PAS), where the latter is exploring training requirements for LPAs associated with needs arising out of the Environment Bill, and how such training may be delivered.
- R.18. Local authorities that are more advanced in their preparations for BNG should be encouraged to share good practice to assist those that are at the start of the process. Case studies showing the journey taken by different authorities may be a particularly useful way of sharing best practice.
- R.19. To address widespread uncertainty, information should be made available to all LPAs as soon as possible to inform them about the government's proposals for BNG and the implications that these will have for each council. This will enable LPAs to identify what they need to do to ensure they are ready and resourced for the introduction of BNG.

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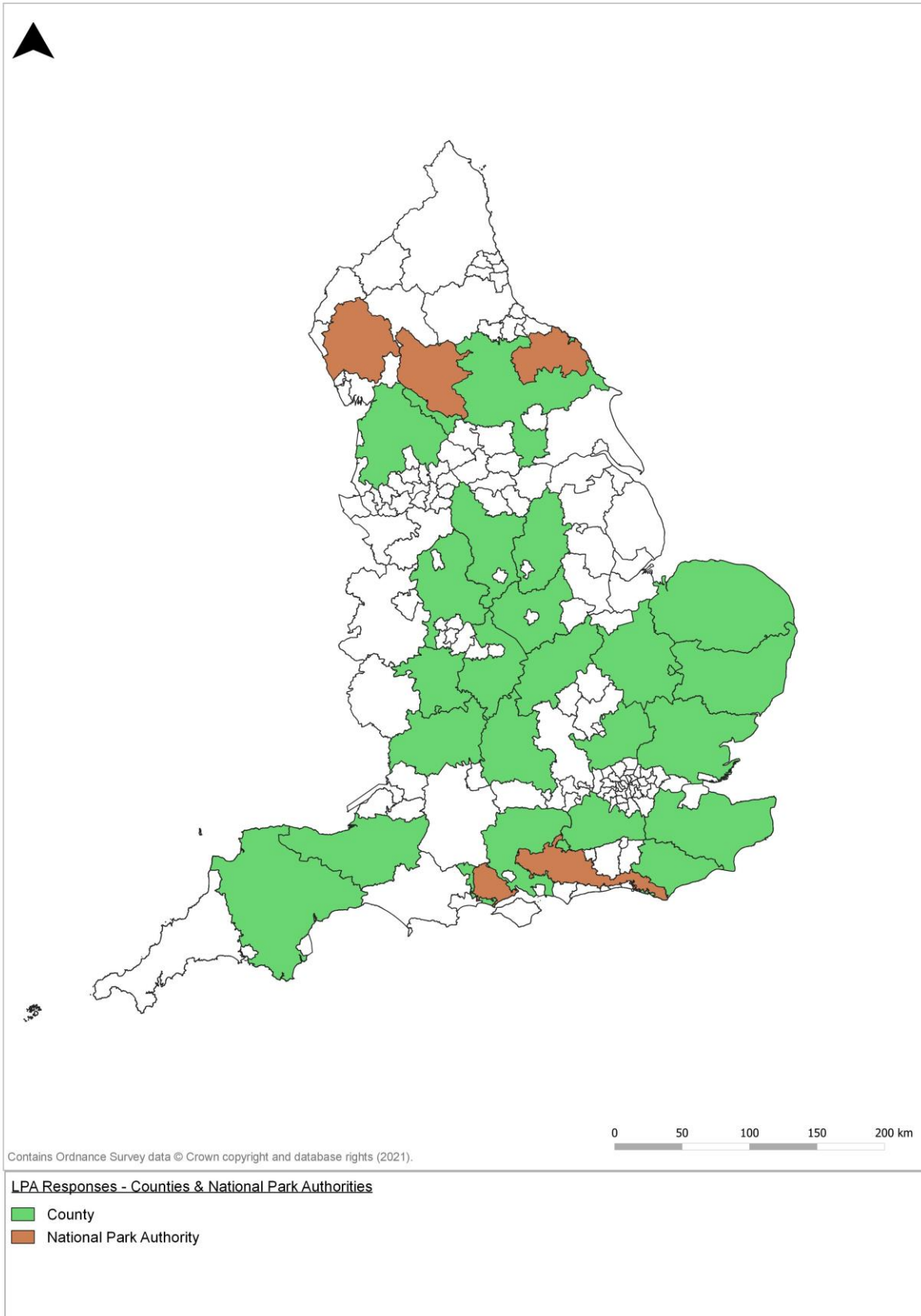
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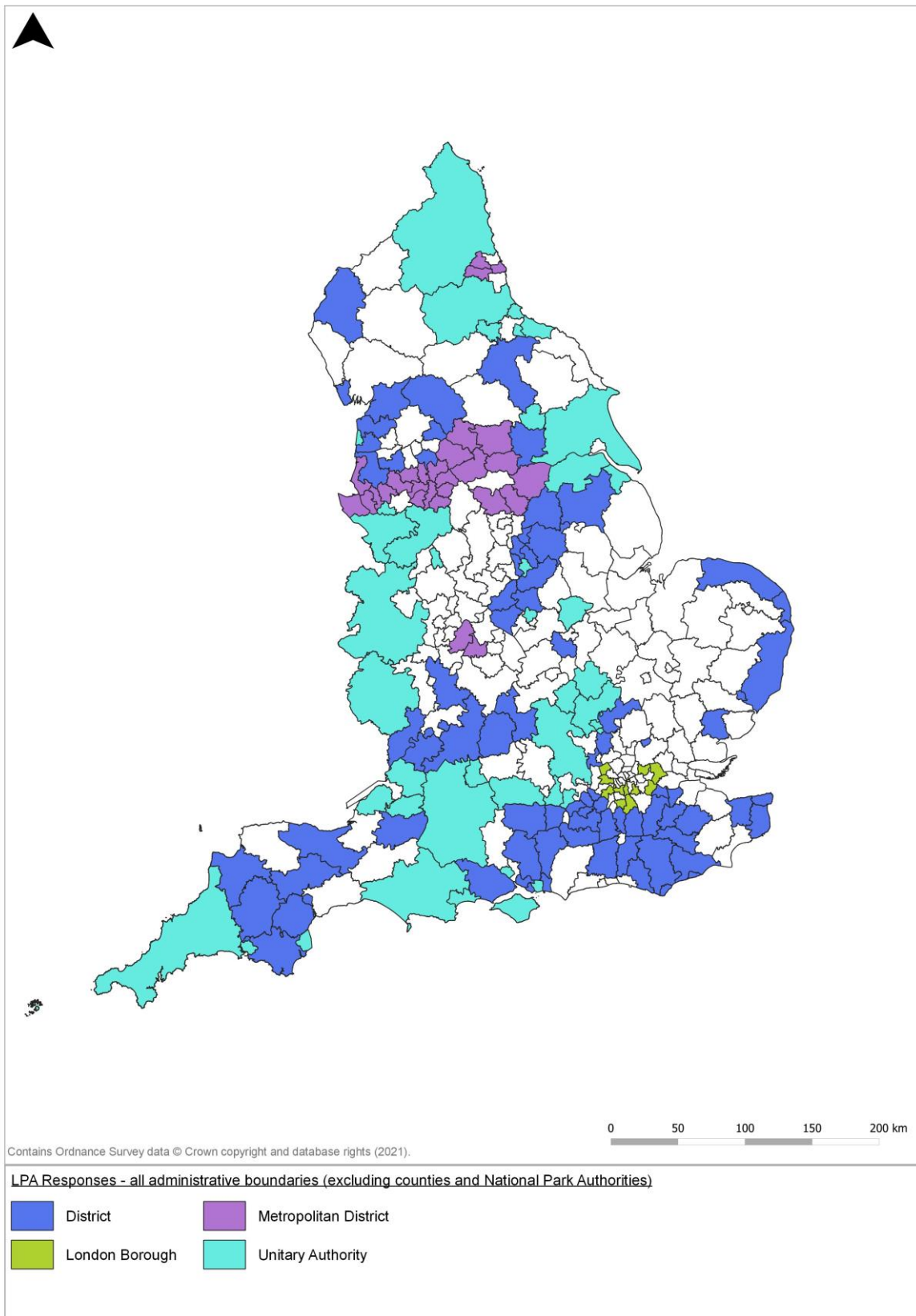
# APPENDICES

## Appendix 1

Map 2 County Councils and National Parks Responding to the Survey



**Map 3 District, Unitary, Metropolitan and London Boroughs Responding to the Survey**



## Appendix 2

Appendices 2 and 3 contain the full text answers to Qs.34 and 35.

All the answers are attributable to an individual named respondent in Survey Monkey.

Appendix 2 provides the full text responses received for Q.34 which was an open text question that asked: *In addition to possible new staff resources, what specialist training would you like to see provided and who do you think is best placed to deliver this?*

1. Training on use of metric/BNG and identifying sites.
2. Training on the whole process!
3. Overview training for planning officers and Ecological Advisors as well a consultant ecologists
4. BNG metric training and report writing training - the CIEEM course is good, but maybe a [course] aimed specifically at LPA ecologists and planners might be useful. ALGE might be a good provider?
5. Basic standard training on national standard and more specific LPA training based on local environments
6. This will be a big change for officers in the Council, and there is limited knowledge/experience to date or trained personnel within the authority to deal with this at present. All around training in BNG, how to meet the requirements of the BNG legislation/Environment Bill. Training will likely need to be tailored to slightly different needs of DM and Policy.
7. Training and experience using the metric in different scenarios
8. Training for Planning Officers who visit site to inform whether BNG is required
9. For me, it is developers and their ecologists and landscape architects that require the most training, as most of my time on BNG is critiquing the submitted reports, as they almost always state +ve NG but once properly evaluated, often come back as Net Loss, due to appalling and generic planting / landscaping schemes. As noted, often because these are last to be developed, so are 'tacked on' at the end and are often not fit for purpose. CIEEM / IEMA, Landscaping Institute etc. are critical for upskilling consultants.
10. Training in BNG metric
11. Yes specialist training useful and by the County Council.
12. Training in habitat creation and management
13. Training would be useful but no-one with capacity to carry out the work
14. Ecological training
15. Training on new guidance, use of metric
16. DM officers and managers urgent require basic knowledge - more specialist knowledge will be needed across disciplines as work progresses. Training providers should be non-commercial and have first-hand practical experience. Should not be NE.
17. Natural England to ensure that any training is consistent across the whole of England but also LNP's so it can highlight any local variances.
18. Specialist Delivery of technical training
19. Training on Defra Metric; Role of Recovery Strategy; The new requirements set out in the Act that the LPA will have to be aware of to implement BNG. Training should be from ecologists/Defra, Wildlife Trust and Local Nature Partnerships
20. Training on the BNG process this could be [led] by ALGE
21. BNG for LPAs training to be a rolling programme: NE, CIEEM, ALGE
22. All sorts of training. Potentially by the Notts Wildlife Trust, if they have the capacity (which seems doubtful).

23. Training for Planning officers and elected Members - Local Nature Partnerships
24. Training on the practicalities of using the metric and doing condition assessments
25. Assessment of applications using metrics, development of guidance for applicants, legal training related to securing BNG sites and their monitoring. ALGE/those with knowledge of realities of LPA work, CIEEM, possibly commercial providers of BNG such as Envirobank
26. Training of planners who don't have ecologist in interpretation of metric
27. Specific training for DM officers as well as Policy Officers and Councillors
28. New information systems and expertise / training to use these, whether in house or the local records centre.
29. Detailed BNG training for Biodiversity Officers (Practitioners), Broad support training for Planning Officers. Natural England would seem best place to provide training
30. Training that is offered to local planning authorities for free to ensure that all relevant staff are able to attend/access this important training, to bring everyone up to standard for consistency reasons. LPA training budgets are minimal, and many officers cannot access their required hours of training for CPD reasons even though you are expected to be a professional institute member. Or LPA must recognise that there must be a dedicated training resource available to their in-house ecologists and senior planning officers (for example) as nominated BNG "experts" within the council. A basic understanding of BNG is required for all planning officers. When it becomes mandatory it should be being taught as part of the Planning Degree/Masters at universities.
31. Legal training on form of agreements - DEFRA, Consultants
32. Training in metric analysis, legal agreements for off site
33. It depends on the final outcome of the Environment Bill and requirements placed on planning - however training to raise awareness and understanding of the requirements, how to assess what habitats are important and place a comparative value on it (eg are gardens with a pond and / or native tree needs more important than grass; how to value current activities versus future (eg land used for bee keeping - important or relocatable or does this require assessment of surrounding 'foraging habitat'? Done by NE and Defra which could be supplemented by LNP or similar.
34. Some training on BNG, implementation, monitoring and enforcement
35. Site appraisals and habitat valuing, BNG metric training, how to monitor and enforce BNG agreements; Ecologists, NE and Defra
36. Training on how to set up and use net gain providers/be a provider. Understanding the use of conservation covenants. training on nature recovery strategy and networks.
37. More CIEEM training courses
38. More training for Development Management and planning officers from an external professional
39. More training on the metric would be helpful and also support in identifying habitat offset areas (if this isn't going to be done by habitat bank)
40. Training on how to use the metric
41. Training is use of metric.
42. Planning officer who deal with planning applications will require more training so that from the offset they can ascertain if enough information is submitted before consulting an ecologist
43. Training on the metric and UK Habitat classification. Application of the metric to open mosaic habitats. Suitability of sites for habitat creation in terms of soils, hydrology and connectivity.
44. Part of case officers training
45. Planning staff will need to be aware of LPA BNG/ENG procedures. Such induction would best be handled by the additional (planning) ecologists. Defra and NE would be best placed to provide more general guidance and materials which could be used in support of such training and subsequent support. However, the organisations best placed to provide support on the management and use of environmental data, including BNG administration, dynamic LNRS mapping etc will be LERCs, and ADEPT, ALGE and Defra should identify how best to address this. biodiversity data will be



46. Training on BNG - planning applications and enforcement
47. Training in use of the biodiversity metric
48. Training on using the metric from specialists. Ecology training to inform decisions related to the metric by ecology specialists (maybe NE or Wildlife Trust, County Ecologist)
- 49.
50. Training on utilising and applying the Biodiversity Metric (likely to require updating each time a new version is released), Training on devising and implementing robust legal agreements to secure net gain. Possibly by professional bodies such as CIEEM. Training on digital tools to be introduced by Natural England such as Net gain register to be delivered through Natural England
51. Training in how to interpret/check net gain outputs and ensure accuracy - Natural England.
52. CIEEM have done some good training in BNG. Also need a follow up service to advise on issues. Wakefield Council need more commitment to having their own ecologist.
53. All planning staff will require BNG training, and this could be provided by a range of organisations, but Local Nature Partnerships would be best placed.
54. BNG training generally
55. LA based training from NE on operation of the metric with case studies on smaller developments, and not just based on large area with different habitats to demonstrate how it works. Lots of sites aren't like that - more realistic examples. Also, where no net loss, how additionality can be achieved.
56. Metric training for LPA and consultant ecologists, by national/local experts
57. BNG Training, Defra/GMCA
58. Basic training with specialist officers employed to deal with BNG
59. Data curation, to capture potential re habitats and species and to capture monitoring data to understand effectiveness - to be provided by Local Record Centre's: training in the Defra metric and support to understand / adapt / implement it - to be provided by Defra / NE; guidance on nature recovery strategies and lessons learnt from pilots - Defra / NE
60. Training for planning officers and ecologists re BNG and application of metric. delivered by Government agencies
61. Comprehensive package of training for planners on BNG and working with ecologists and land managers. A training organisation drawn from a consortium of Wildlife Trusts and land managers.
62. Training on the metric, habitat banks, legal mechanisms
63. Any training welcomed
64. Training will be required across all of the new Environment Bill duties - NE and CIEEM
65. Local Nature Partnership providing Biodiversity and Development training including BNG training at all levels of Planning team from Case workers/unqualified verifiers to qualified Planners and planning Policy makers
66. Metric training, habitat banking etc - Natural England
67. Training on how to set up a BNG system and different components.
68. Training needed on using the metric, interpretation of UK Habitat assessments of habitats, undertaking legal agreements, delivering net gain on council-owned land (i.e. being a BNG provider)
69. Understanding of environmental economics - UKNEE? CIRIA? Links to sustainable drainage delivery. Links to parks and green space management. Training for smaller scale developers to enable them to understand BNG and the real costs and benefits.
70. Training required for LPA planners. Should be being rolled out by Natural England as we speak!
71. Training for DM planners
72. All Borough and District Councils in Surrey lack ecology support to all their services. Services supporting planning therefore incl legal and land management have no specific advisors in house. SWT

are doing our best to encourage LPAs to accept our training, but we simply do not have the time or resources to deliver this training as well as the day job.

73. Condition assessment training - Authority specific, Covenants/legal obligations and securing land management, enforcement, examples/best practice of offsetting. Will need to be led/coordinated by LA Officers rather than consultants to be of most value. May also need to be multidisciplinary e.g. lawyers
74. Training on all elements - BNG, UK Hab, Metric, LNRS etc Delivered by experts in those areas with a deep understanding of the LPA perspective. Training should be available for all relevant departments / roles, not just the LPA Ecologists.
75. Ecology training for planning officers/managers delivered by trained and licensed ecologists either in house or externally
76. Use of BNG metric and how much reliance can be put on it. Training by Defra with CIEEM and ALGE
77. NE/EA. Training targeted at ecologists and planning officers re practical implementation
78. Planning officers/committee members - training in scrutinising Metric calculations - private sector

### Appendix 3

**Appendix 3 provides the full text responses received for Q.35 which was an open text question which asked: "What would be your priorities for support and guidance from the Government?"**

1. Support for training or procuring ecological support. Clear guidance on LPA requirements
2. Providing training
3. UK Hab courses and consultants
4. Further guidance is required on LNRSs in terms of their creation, areas and the types of projects suitable within this area. I think further guidance is also required on how LPAs will be required to report on BNG within their areas including the format of reports, frequency and what information is required. LPA's need time to put systems in place to deliver these outputs and therefore guidance is required sooner rather than later. To date, for example, we have been told that LNRS areas will be defined during the transition period however this means that LPAs will not have the whole transition period to develop and implement the strategies putting more pressure on LPA ecologists and associated officers. Advice should be timely and support available from NE and Defra to help LPAs implement new strategies should be provided as an ongoing priority throughout the transition period and beyond.
5. Penalties for non-compliance with BNG and resources at ground level (Officers to advise, monitor and assist)
6. All around training in BNG, how to meet the requirements of the BNG legislation/Environment Bill. Training will likely need to be tailored to slightly different needs of DM and Policy.
7. Additional funding to implement this policy
8. Clear planning structure that invalidates planning applications (if necessary) that do not contain indicative BNG at submission, to prevent delays down the line. Possibly a national qualification in BNG submission for ecologists (and planners / ecologists) to demonstrate competence (can be delivered via CIEEM etc.) Guidance to developers that this must be built into the design at the start of the process, rather than pandering to developers complaining about delays (cf. 'gold standards' for protected species rhetoric), which is not supported by the evidence
9. Funding
10. Additional funding to enable the mandated measures to actually be achievable.
11. Use and interpretation of Defra metric, assessment of habitat condition
12. Provision of in-house ecologist or financial contribution towards buying in ecology expertise from other authorities
13. Clear policy, easy to implement, easy to enforce
14. A user-friendly guidance note

15. Funding
16. Establish good practice which first of all demonstrates achievement of no net loss and that BNG is not being used as a means of manipulating figures and side-stepping mitigation requirements. Land banking and long-term maintenance and monitoring.
17. Ensure there is sufficient staff to carry out the work and get the all the strategies etc produced.
18. Staff provision
19. Funding to deliver
20. Using the metric, ensuring compliance.
21. Comprehensive guidance and legislation. Training for PINS
22. Guidance including Clear expectations of quality required from applicants
23. Get their act together on planning and BNG and the Habs Regs
24. Having the adequate statutory tools with proper teeth and funding to support the roll out of BNG
25. Adequate resources. Effective information systems to support delivery of local authorities' Environment Bill obligations and facilitate cross-boundary working and national reporting in accordance with agreed data standards.
26. Additional funding / resources to hand new workload / clear instructions on the approach to delivering BNG and how this should impact on the decision-making process
27. Clear and robust, easy to understand and specific guidance for local planning authorities on the implementation of BNG (when it is required legally). All too often guidance is produced that is not fit for purpose or is too ambiguous or open to interpretation (e.g. standing advice on the GOV.UK website). Natural England must be allowed to produce guidance on BNG and LNRS - and the interrelationship between these two statutory requirements in future.
28. Regular updates on metrics. How does it link to Environmental Gain. Long term monitoring requirements. Enforcement
29. Appropriate resources, clarity over the requirements, with clear fit for purpose guidance and longevity in terminology / approach with regard to what has gone before rather than re-invent the wheel (eg how can Nature Improvement Areas evolve into NRNs)
30. In an urban area how to measure BNG (Defra is too generic).
31. Resourcing, clear guidance, sharing best practice
32. Additional burdens payments, standard reporting templates for gains and losses, template agreements etc
33. Clarity, clear guidance on procedure, more investment in Defra, Natural England, RPA.
34. Guidance on who is going to manage the habitat bank 'register' and monitor the offset sites over the 30-year period
35. Planning Policy Officers
36. Model planning conditions and obligations
37. A strategic approach is required at a County/regional level to ensure that all local authorities are following the same approach and asking for the same information. Government also need to help set up a BNG trading platform similar to the nitrates trading platform which is currently being explored, identifying schemes that developers can contribute towards which can be used for BNG. We need mitigation schemes that are ready to go and be paid for and currently a lot of authorities do not have the finances to purchase land to create BNG schemes.
38. Funding for additional staff capacity
39. Be able to look at matrices and translate to check they have been done correctly
40. An effective system for managing environmental data, LNRS mapping and targeting and BNG/ENG administration, implementation, monitoring and reporting to enable LPAs and responsible authorities to administer their responsibilities effectively and at minimal cost, whilst facilitating sustainable

development in accordance with the mitigation hierarchy to achieve meaningful and lasting gains for nature, people and the environment, with this to be [developed] to facilitate cross-boundary working and the aggregation of data for national indicators and reporting. 2. Effective funding mechanism within the planning system to ensure that the funds would be provided to support the system in the long-term. 3. A system that deals effectively with indirect impacts and species. 4. A recognition that prioritising local delivery, support and evidence provision will be critical to success. And prioritising local support and delivery

41. Additional resources for us in the Local Planning Authority
42. Clear, agreed national guidance on BNG
43. Training on completion of metric (including the ecology knowledge), 2) Funding and staff to deliver BNG
44. Clear guidance on the steps and resources required to set up a self-financing BNG system. Additional resources (such as updated fine grain mapping of habitats) to inform the production of Local Nature Recovery Strategies.
45. Support with where developers indicate they wish to provide off-site net gain - currently we have not identified sites where net gain contributions could be directed.
46. Standard system for managing the flow of BNG information (don't wait for everyone to set up their own system).
47. Finance for staff time and to forward-fund BNG projects in advance of payments from developers.
48. National overview via NE or other national body to ensure role out and methodology is consistent and reporting can be fed into the nationwide picture
49. Explicit guidance and set out how they expect monitoring and enforcement to be undertaken - don't check and enforce existing conditions given resource issues, and the taking of enforcement action is not statutory.
50. Securing monetary contributions, underpinning mandatory 10% net gain and Environment Bill
51. Biodiversity Metric
52. Money
53. Defra Metric and evolving bespoke solutions at the local level
54. Funding, published guidance, training inc webinars
55. A full package of training and support that can be brought in to the LPA. Initially to provide a specialist
56. Habitat banks, LNRS,
57. Funding and Training
58. Adequate funding and clear and realistic guidance
59. Financial Support to provide adequate knowledgeable, experienced staff.
60. Detailed guidance on how to embed BNG into planning
61. How to set up a BNG System that is self-funded within a LPA.
62. Financial support for capacity building and training, thorough guidance to accompany the Env Act to remove any ambiguities in interpretation
63. Upskilling and ensuring capacity in Local Planning Authorities.
64. Financial
65. Financial support to fund specialist post(s)
66. Funding for ecology advice. Each LPA currently pays approx £8K excl VAT per annum for our service, some less.
67. Funding, staffing, clear repeatable process for covenants, legal support, Planning Inspectorate to take consistent approach!!
68. Increased funding so that we have the adequate staff levels to deal with increased work load and

- 69. Support for extra staff resource and support to monitor net gain of habitats including trees across England for BNG, LNRS, NNR and Climate Change mitigation reporting. By Defra/Natural England using remote sensing that LPAs can access.
- 70. Further consideration and guidance regarding long-term assessment of BNG specifically relating to restoration of mineral extraction sites.
- 71. More resourcing is absolute priority. Guidance and a framework for producing Local Nature Recovery Strategies from DLUHC would be very helpful.

## Appendix 4

Appendix 4 provides the percentage of responses recorded against each question of the survey.

**Note: the percentage figures given are the percentages of those who answered the question; they do not include those who did not provide an answer to that particular question.**

### Q1 Please enter your Contact Details below:

Answered: 286 Skipped: 51

ANSWER CHOICES	RESPONSES	
Name	99.30%	284
Local Authority	0.00%	0
Name of Authority	99.65%	285
Position	0.00%	0
City/Town	0.00%	0
State/Province	0.00%	0
ZIP/Postal Code	0.00%	0
Country	0.00%	0
Email Address	97.20%	278
Phone Number	79.02%	226

### Q2 What is your role?

Answered: 337 Skipped: 0

ANSWER CHOICES	RESPONSES	
Planning Officer	45.40%	153
Ecologist/Biodiversity Officer	36.80%	124
Landscape Officer	2.97%	10
Other (please specify)	19.58%	66
Total Respondents: 337		

### Q3 What type of LPA do you work for?

Answered: 337 Skipped: 0

ANSWER CHOICES	RESPONSES	
District Council	45.70%	154
Unitary Authority	23.44%	79
County Council	18.69%	63
Metropolitan Borough	10.98%	37
Other (please specify)	5.93%	20
National Park	2.67%	9
Total Respondents: 337		

### Q4 How does your authority currently access ecological expertise?

Answered: 277 Skipped: 60

ANSWER CHOICES	RESPONSES	
In house ecologist	59.21%	164
Service level agreement with another organisation e.g. County Council or Wildlife Trust	24.55%	68
Contracted through consultants	12.64%	35
No access to ecological expertise	7.94%	22
Ecologist shared with another LPA	6.86%	19
Total Respondents: 277		

### Q5 What is your authority's current ecological capacity?(Expressed as full time equivalent (FTE) ecologists available for planning work)

Answered: 281 Skipped: 56

ANSWER CHOICES	RESPONSES	
Less than 0.5	44.13%	124
0.5	8.54%	24
1	30.96%	87
2	5.34%	15
3	4.63%	13
More than 4	6.41%	18
TOTAL		281

### Q6 Are current ecological resources adequate for current workload? Where 1 = no current capacity and where 7 = all applications that affect biodiversity are adequately scrutinised

Answered: 285 Skipped: 52

	1	2	3	4	5	6	7	TOTAL	WEIGHTED AVERAGE
	12.63%	16.14%	15.09%	15.44%	17.89%	17.54%	5.26%		
	36	46	43	44	51	50	15	285	3.84

## Q7 How do you normally identify whether an application is likely to affect biodiversity?

Answered: 261 Skipped: 76

	REGULARLY	OFTEN	OCCASIONALLY	RARELY	NOT AT ALL	TOTAL
Ecological information submitted by the applicant	54.58% 137	31.87% 80	8.76% 22	3.19% 8	1.59% 4	251
Consultees comments on planning applications	32.39% 80	21.05% 52	34.01% 84	10.53% 26	2.02% 5	247
GIS/Planning alert maps	48.78% 120	27.24% 67	14.63% 36	3.25% 8	6.10% 15	246
Comments from the professional ecologist working for the LPA	58.78% 144	14.29% 35	9.39% 23	3.67% 9	13.88% 34	245
Registration clerks (technical assistants) using validation requirements	35.15% 84	16.32% 39	15.90% 38	10.46% 25	22.18% 53	239
Use of NE Standing Advice (or other guidance)	23.08% 54	24.36% 57	27.35% 64	14.53% 34	10.68% 25	234
Your own personal judgement as an experienced planner	47.64% 111	25.75% 60	18.03% 42	5.15% 12	3.43% 8	233

## Q8 Can you provide an estimate of how many applications your LPA deals with each year where biodiversity is a material consideration (e.g. planning conditions are used to avoid harm and/or secure benefits)?

Answered: 245 Skipped: 92

	0	1-20	21-50	50+	DON'T KNOW	TOTAL
Conversion of rural buildings (barns)	19.50% 47	22.41% 54	21.99% 53	16.18% 39	19.92% 48	241
Major developments	1.25% 3	31.67% 76	33.75% 81	17.92% 43	15.42% 37	240
Pre-application discussions	2.09% 5	22.18% 53	26.78% 64	27.62% 66	21.34% 51	239
Renewable energy projects	18.41% 44	56.07% 134	3.35% 8	0.42% 1	21.76% 52	239
Minerals and waste	36.82% 88	32.22% 77	10.04% 24	2.93% 7	17.99% 43	239
National Strategic Infrastructure Project	42.68% 102	38.91% 93	1.26% 3	0.00% 0	17.15% 41	239
Small and medium sized	1.69% 4	9.28% 22	21.10% 50	49.79% 118	18.14% 43	237
Outline applications	5.06% 12	35.44% 84	17.72% 42	20.68% 49	21.10% 50	237

## Q9 What proportion of your total time is involved with the following areas of work?

Answered: 238 Skipped: 99

	0%	1-33%	34-66%	>66%	DON'T KNOW	TOTAL
Planning case work – with no BNG	8.51% 20	38.72% 91	19.57% 46	23.40% 55	9.79% 23	235
Support for Local Nature Partnerships	47.86% 112	44.44% 104	2.14% 5	0.43% 1	5.13% 12	234
Work re Local Wildlife Sites Network & Corridors	26.72% 62	61.64% 143	6.03% 14	0.86% 2	4.74% 11	232
Management of council land for biodiversity purposes	42.24% 98	39.22% 91	10.78% 25	2.59% 6	5.17% 12	232
Planning case work – with some BNG	7.36% 17	48.05% 111	24.68% 57	11.69% 27	8.23% 19	231
Input into council-led developments e.g. highways, creation of public open space	19.91% 46	65.80% 152	9.09% 21	0.87% 2	4.33% 10	231
Habitat opportunity mapping	42.61% 98	45.22% 104	3.48% 8	0.43% 1	8.26% 19	230



Q10 From your experience of planning case work that involves ecological impacts and mitigation what best describes the likely final outcome for the applicant? Please rank the following options where 1 = most likely/common outcome and 5 = the least likely/common.

Answered: 221 Skipped: 116

	1	2	3	4	5	6	N/A	TOTAL	SCORE
Application is approved with few/minor outstanding issues (possible delays and increased costs for applicant)- Additional essential ecological information required prior to determination - Conditions only necessary to secure implementation of agreed ecological measures	34.87% 68	31.79% 62	16.41% 32	5.13% 10	2.05% 4	1.03% 2	8.72% 17	195	4.98
Application is approved but with pre-commencement conditions (likely/significant delays to commencement of development)- Additional essential ecological information required following issue of planning consent- Pre-commencement conditions imposed to secure outstanding ecological information- Additional conditions imposed to secure necessary implementation of agreed ecological measures	24.64% 51	19.32% 40	18.36% 38	15.46% 32	6.28% 13	6.28% 13	9.66% 20	207	4.24
Application is approved (no additional information required)No outstanding issues or problems and all necessary information submitted- no delay to determination- no further ecological information required from the applicant- conditions only necessary to secure implementation of agreed ecological measures	22.70% 42	17.30% 32	25.41% 47	10.27% 19	9.19% 17	5.41% 10	9.73% 18	185	4.20
Application is approved with significant outstanding issues (significant likely delays and increased costs for applicant)- Additional essential ecological information required prior to determination - Conditions only necessary to secure implementation of agreed ecological measures	6.06% 12	12.12% 24	20.71% 41	19.19% 38	13.13% 26	15.15% 30	13.64% 27	198	3.23
Application withdrawn or deferred Pending submission of further essential information	4.00% 8	5.50% 11	12.50% 25	23.00% 46	33.50% 67	12.00% 24	9.50% 19	200	2.76
Application refused Proposals are wholly inadequate and/or contrary to planning policy	0.94% 2	6.60% 14	4.72% 10	16.04% 34	26.89% 57	35.38% 75	9.43% 20	212	2.15

Q11 How would you describe your understanding of the following elements within the Environment Bill? Please use the drop down menus to pick what best reflects your current understanding.

Answered: 234 Skipped: 103

	I HAVE ALREADY BEEN INVOLVED WITH WORK ON THIS IN MY OWN LOCAL AUTHORITY	I HAVE NOT STARTED WORK ON THIS YET BUT HAVE A SOUND UNDERSTANDING OF WHAT IS PROPOSED	I HAVE A BROAD UNDERSTANDING OF WHAT IS PROPOSED BUT NOT TOO SURE OF THE DETAIL	I HAVE HEARD OF THE TERM BUT KNOW VERY LITTLE ABOUT THE DETAILED PROPOSALS	I HAVE NOT HEARD OF THIS BEFORE	TOTAL
Biodiversity Net Gain	46.56% 109	16.24% 38	32.91% 77	3.85% 9	0.43% 1	234
Local Nature Recovery Strategies	15.22% 35	10.00% 23	39.57% 91	27.39% 63	7.83% 18	230
Protected Sites Strategies	11.35% 26	6.11% 14	30.57% 70	29.69% 68	22.27% 51	229
Species Conservation Strategies	8.77% 20	7.89% 18	29.82% 68	33.33% 76	20.18% 46	228

## Q12 BNG and Policy Work

Answered: 229 Skipped: 108

	YES	NO	TOTAL
We have existing local plan policies relating to BNG	44.95% 89	55.05% 109	198
We are in the process of preparing local plan policies for BNG	75.65% 146	24.35% 47	193
We have been challenged over BNG local plan policies	15.38% 24	84.62% 132	156
Challenges have been dismissed by Inspector at EIP	4.03% 6	95.97% 143	149

## Q13 BNG and Development Management

Answered: 226 Skipped: 111

ANSWER CHOICES	RESPONSES
We have experience of securing BNG through existing planning consents	67.26% 152
We have no current experience of BNG in planning case work	32.74% 74
TOTAL	226

### Q14 Do you use the Defra metric when securing BNG

Answered: 152 Skipped: 185

ANSWER CHOICES	RESPONSES	
We use the Defra metric	67.76%	103
We use a modified version of the Defra metric	13.16%	20
We do not use any metric and do not currently seek BNG	19.08%	29
TOTAL		152

### Q15 In the last 12 months, how many applications determined by your LPA have secured a BNG?

Answered: 144 Skipped: 193

ANSWER CHOICES	RESPONSES	
0	2.78%	4
1-5	38.19%	55
6-10	22.22%	32
11-20	12.50%	18
>20	25.00%	36
Total Respondents: 144		

### Q16 What is the average percentage of net gain secured?

Answered: 137 Skipped: 200

ANSWER CHOICES	RESPONSES	
<5%	30.66%	42
5-10%	51.82%	71
>10%	17.52%	24
TOTAL		137

### Q17 Have you defended planning decisions relating to BNG at planning appeals?

Answered: 223 Skipped: 114

ANSWER CHOICES	RESPONSES	
Yes	4.48%	10
No	95.52%	213
TOTAL		223

Q18 If you entered Yes above, what are the number of appeals the LPA has:

Answered: 9 Skipped: 328

ANSWER CHOICES	AVERAGE NUMBER	TOTAL NUMBER	RESPONSES
Won	1	12	9
Lost	0	2	7
Total Respondents: 9			

Q19 To what extent do you expect planning reforms to enable BNG delivery and the preparation of Local Nature Recovery Strategies? Where 1 = no expectation that planning reforms will assist and 7 = expectation that planning reforms will be explicit over how the system should deliver BNG and LNRSS

Answered: 223 Skipped: 114

	1	2	3	4	5	6	TOTAL	WEIGHTED AVERAGE
	5.38%	12.11%	18.39%	30.49%	21.52%	12.11%		
	12	27	41	68	48	27	223	3.87

Q20 Do you have a Biodiversity (Nature Conservation) Strategy or Supplementary Planning Document (SPD) or relevant Local Nature Partnership document that underpins your natural environment policies in the local plan?

Answered: 227 Skipped: 110

ANSWER CHOICES	RESPONSES
Yes	25.99% 59
No – not yet, but it is in preparation	31.72% 72
No	42.29% 96
TOTAL	227

Q21 In your opinion, is the above planning guidance fit to inform the delivery of BNG and preparation of your LPA's Local Nature Recovery Strategy (LNRS)?

Answered: 61 Skipped: 276

	YES	NO	DON'T KNOW	TOTAL
Fit to inform delivery of BNG	21.31% 13	49.18% 30	29.51% 18	61
Fit to inform preparation of LNRS	16.67% 10	33.33% 20	50.00% 30	60

## Q22 Who do you expect to lead the development of the Local Nature Recovery Strategy for your area?

Answered: 90 Skipped: 247

ANSWER CHOICES	RESPONSES	
The Local Nature Partnership (LNP)	36.67%	33
My own authority	26.67%	24
Other (please specify)	26.67%	24
A higher tier LPA (e.g. County Council)	24.44%	22
A local conservation organisation	6.67%	6
A neighbouring District/Unitary/Metropolitan LPA	0.00%	0
Total Respondents: 90		

## Q23 In your opinion, what priority should your LPA attach to preparing local guidance for the introduction of Biodiversity Net Gain? Where 1 is a very low priority and 5 is very high priority

Answered: 225 Skipped: 112

	1	2	3	4	5	TOTAL	WEIGHTED AVERAGE
	1.78%	4.44%	14.22%	29.33%	50.22%		
	4	10	32	66	113	225	4.22

## Q24 In your opinion, to what extent will your current resources be adequate to assess whether an application will need to deliver BNG? [Please indicate which you believe best fits your situation].

Answered: 223 Skipped: 114

ANSWER CHOICES	RESPONSES	
We do not have adequate capacity to deal with the existing planning workload	57.40%	128
Only if other biodiversity work within the council is reduced	23.77%	53
We have no current ecological resource or expertise available	15.25%	34
Current expertise and resources will be adequate	8.52%	19
Total Respondents: 223		

Q25 On a scale of 1 to 5 what is your own current expertise and capability in relation to BNG issues i.e. what do you feel competent to do? Where 1 = not at all confident and 5 = I feel I am an expert

Answered: 225 Skipped: 112

	1	2	3	4	5	TOTAL
Basic understanding of BNG requirements	4.44% 10	10.67% 24	30.67% 69	40.89% 92	13.33% 30	225
Use of the Biodiversity metric	21.33% 48	28.00% 63	29.78% 67	17.78% 40	3.11% 7	225
How to interpret the robustness of ecological reports and BNG proposals	21.78% 49	20.89% 47	22.67% 51	23.56% 53	11.11% 25	225
Negotiating with applicants over inadequate proposals	13.33% 30	17.33% 39	27.11% 61	32.89% 74	9.33% 21	225
Identifying and using planning/legal mechanisms to secure BNG	18.75% 42	22.32% 50	25.45% 57	28.57% 64	4.91% 11	224
Identifying local BNG receptor sites (habitat opportunity mapping)	30.04% 67	31.39% 70	21.52% 48	14.35% 32	2.69% 6	223
Negotiating with landowners over site provision	30.63% 68	27.48% 61	22.97% 51	17.12% 38	1.80% 4	222

Q26 What access do you have to data held by a local biodiversity records centre?

Answered: 213 Skipped: 124

ANSWER CHOICES	RESPONSES
We have a Service level agreement with our Local Biological Record Centre and have access to all biological data sets	65.26% 139
We have a Service level agreement with our Local Biological Record Centre but have access to only some data e.g. local wildlife sites	16.43% 35
We access data from the Local Biological Record Centre as and when we need it and are charged for each enquiry.	6.10% 13
We rarely use data from the Local Biological Record Centre.	10.33% 22
There is no Local Biological Record Centre available for our LPA area.	3.29% 7
Total Respondents: 213	

Q27 Which sources of ecological data do you think will be most useful to inform decisions over BNG? Where 1 = Of little use and 5 = Extremely useful

Answered: 223 Skipped: 114

	1	2	3	4	5	N/A	TOTAL	WEIGHTED AVERAGE
Baseline habitat data held by the LPA (e.g. habitat opportunity maps) for our area	4.05% 9	4.50% 10	12.16% 27	25.68% 57	47.75% 106	5.86% 13	222	4.15
Information held by the LPA on BNG providers and or land that is available for delivery of BNG	3.60% 8	6.76% 15	14.41% 32	24.32% 54	40.99% 91	9.91% 22	222	4.03
Baseline data for key species held by (e.g. distribution maps) for our area	3.18% 7	8.64% 19	15.45% 34	30.00% 66	37.73% 83	5.00% 11	220	3.95
Data provided by applicants as this is normally adequate to inform our planning decisions	0.91% 2	8.18% 18	26.82% 59	35.45% 78	27.73% 61	0.91% 2	220	3.82



Q28 What are your preferred options for identifying and securing land for delivery of BNG? Please rank the following where 1 = most preferred and 5 = least preferred.

Answered: 209 Skipped: 128

	1	2	3	4	5	TOTAL	SCORE
BNG delivered on land owned/controlled your council	43.46% 83	16.75% 32	17.28% 33	10.47% 20	12.04% 23	191	3.69
BNG delivered on Local Nature Partnership land	25.00% 46	40.22% 74	17.39% 32	9.78% 18	7.61% 14	184	3.65
LPA working with local landowners in partnership to provide BNG sites (similar to SHLAA process)	17.80% 34	25.13% 48	37.70% 72	13.61% 26	5.76% 11	191	3.36
BNG sites provided by commercial local BNG operator(s) or land managers (i.e. independent of the Council)	13.16% 25	12.11% 23	20.00% 38	51.05% 97	3.68% 7	190	2.80
BNG sites provided by commercial national/regional BNG operator(s) (i.e. independent of the Council)	5.45% 11	6.44% 13	9.41% 19	13.37% 27	65.35% 132	202	1.73

Q29 How important do you think robust legal agreements and/or conservation covenants will be in securing actual delivery of BNG? Please rank your answer where 1 = not important and 6 = essential

Answered: 221 Skipped: 116

	1	2	3	4	5	6	TOTAL	WEIGHTED AVERAGE
	0.45% 1	0.90% 2	2.71% 6	3.62% 8	15.84% 35	76.47% 169	221	5.63

Q30 In terms of expertise, overall, please indicate where current staff resources will be adequate or where new staff resources will be required? (Additional capacity expressed as new full time equivalents FTE)

Answered: 215 Skipped: 122

	CURRENT CAPACITY ADEQUATE(0 FTE)	MORE CAPACITY REQUIRED (<1 FTE)	MORE CAPACITY REQUIRED (1 FTE)	MORE CAPACITY REQUIRED (2-3 FTE)	MORE CAPACITY REQUIRED (>3 FTE)	TOTAL	WEIGHTED AVERAGE
Ecology	5.12% 11	18.14% 39	49.30% 106	23.26% 50	4.19% 9	215	2.27
Land management	14.59% 27	34.05% 63	30.27% 56	17.84% 33	3.24% 6	185	2.10
Planning	15.66% 31	30.30% 60	39.90% 79	11.62% 23	2.53% 5	198	2.01
Project management	16.84% 33	39.29% 77	33.16% 65	10.20% 20	0.51% 1	196	1.94
Legal services	14.43% 28	50.52% 98	30.93% 60	2.06% 4	2.06% 4	194	1.92
Other	33.33% 20	26.67% 16	30.00% 18	6.67% 4	3.33% 2	60	1.80

Q31 What resources will be required during the transition and preparation period to ensure key areas of work as completed? (i.e. requirement during 1st two yrs)

Answered: 202 Skipped: 135

	CURRENT CAPACITY ADEQUATE (0 FTE)	MORE CAPACITY REQUIRED (0.25 FTE)	MORE CAPACITY REQUIRED (0.5 FTE)	MORE CAPACITY REQUIRED (1 FTE)	MORE CAPACITY REQUIRED (= OR >2 FTE)	TOTAL
Transition and Preparation - Total if possible can you break this down for the following elements?	3.31% 6	3.87% 7	18.78% 34	33.15% 60	40.88% 74	181
Working with landowners and partners to identify BNG sites	2.62% 5	21.99% 42	30.37% 58	34.03% 65	10.99% 21	191
Preparation of the Local Nature Recovery Strategy	5.76% 11	19.90% 38	30.37% 58	32.46% 62	11.52% 22	191
Creation of habitat opportunity maps	10.99% 21	26.18% 50	28.27% 54	26.18% 50	8.38% 16	191

Q32 What resources will be required for delivery and implementation of BNG (i.e. continuous and ongoing requirement)

Answered: 202 Skipped: 135

	CURRENT CAPACITY ADEQUATE (0 FTE)	MORE CAPACITY REQUIRED (0.25 FTE)	MORE CAPACITY REQUIRED (0.5 FTE)	MORE CAPACITY REQUIRED (1 FTE)	MORE CAPACITY REQUIRED (= OR >2 FTE)	TOTAL	WEIGHTED AVERAGE
Delivery and Implementation - Total if possible can you break this down for the following elements?	2.74% 4	2.74% 4	14.38% 21	30.14% 44	50.00% 73	146	3.92
Input from ecology	3.61% 7	12.89% 25	23.20% 45	44.33% 86	15.98% 31	194	3.12
Land management	14.04% 24	21.64% 37	19.88% 34	29.24% 50	15.20% 26	171	2.81
Planning services	13.81% 25	17.68% 32	30.39% 55	29.28% 53	8.84% 16	181	2.72
Legal services	12.00% 21	36.00% 63	26.29% 46	21.14% 37	4.57% 8	175	2.49
Property services	27.50% 44	29.38% 47	21.88% 35	17.50% 28	3.75% 6	160	2.23



Q33 What resources will be required for monitoring and reporting on BNG?  
(i.e. periodic/sporadic and ongoing)

Answered: 201 Skipped: 136

	CURRENT CAPACITY ADEQUATE (0 FTE)	MORE CAPACITY REQUIRED (0.25 FTE)	MORE CAPACITY REQUIRED (0.5 FTE)	MORE CAPACITY REQUIRED (1 FTE)	MORE CAPACITY REQUIRED (= OR > 2 FTE)	TOTAL	WEIGHTED AVERAGE
Delivery and Implementation - Total if possible can you break this down for the following elements?	1.94% 3	5.81% 9	22.58% 35	34.84% 54	34.84% 54	155	3.25
Monitoring delivery	2.11% 4	24.74% 47	31.58% 60	32.11% 61	9.47% 18	190	2.81
Enforcement	2.15% 4	32.26% 60	27.96% 52	27.96% 52	9.68% 18	186	2.73
Reporting on gains	2.67% 5	35.29% 66	29.41% 55	25.67% 48	6.95% 13	187	2.66

Q34 In addition to possible new staff resources, what specialist training would you like to see provided and who do you think is best placed to deliver this?

Answered: 162 Skipped: 175

This question was 'open' allowing a text answer. The answers are provided in full in Appendix 2.

Q35 What would be your priorities for support and guidance from the Government?

Answered: 164 Skipped: 173

This question was 'open' allowing a text answer. The answers are provided in full in Appendix 3.

### Q36 To what extent are the following staffing issues a risk to your LPA's ability to implement mandatory BNG?

Answered: 210 Skipped: 127

	VERY LOW	LOW	MODERATE	HIGH	VERY HIGH	TOTAL	WEIGHTED AVERAGE
Lack of ecological expertise and/or capacity	5.24% 11	12.38% 26	20.00% 42	32.38% 68	30.00% 63	210	3.70
Lack of enforcement staff	1.93% 4	8.21% 17	29.47% 61	38.65% 80	21.74% 45	207	3.70
Lack of training for relevant LA departments (e.g. ecology, planning, legal, property services)	0.95% 2	9.05% 19	33.81% 71	38.10% 80	18.10% 38	210	3.63
Recruitment to fill new posts with appropriate expertise	4.04% 8	11.62% 23	27.78% 55	32.83% 65	23.74% 47	198	3.61
Lack of legal expertise and/or capacity (e.g. staff with knowledge of BNG)	2.43% 5	18.93% 39	38.35% 79	27.67% 57	12.62% 26	206	3.29
Lack of planning expertise and/or capacity	4.83% 10	25.60% 53	31.88% 66	24.64% 51	13.04% 27	207	3.15

### Q37 To what extent are the following technical and financial issues a risk to your LPA's ability to implement mandatory BNG?

Answered: 208 Skipped: 129

	VERY LOW	LOW	MODERATE	HIGH	VERY HIGH	TOTAL	WEIGHTED AVERAGE
Future anticipated budgetary cuts within LPA	0.00% 0	4.88% 10	22.93% 47	30.73% 63	41.46% 85	205	4.09
Inadequate resources during transition period (e.g. need for pump priming)	0.49% 1	3.94% 8	19.70% 40	38.92% 79	36.95% 75	203	4.08
Delivery of BNG projects outside of out LPA area (e.g. political opposition to projects not being near to the impacts)	3.03% 6	14.65% 29	28.28% 56	33.33% 66	20.71% 41	198	3.54
BNG monies used to support other LA priorities (e.g. if not ring-fenced - education, social care etc)	4.10% 8	17.44% 34	25.13% 49	31.28% 61	22.05% 43	195	3.50
Lack of available land for BNG locally	3.94% 8	18.23% 37	40.39% 82	21.18% 43	16.26% 33	203	3.28
Inadequate habitat opportunity mapping	5.37% 11	22.44% 46	30.73% 63	28.29% 58	13.17% 27	205	3.21

### Q38 Are you happy to be contacted in the future to follow up on related issues?

Answered: 208 Skipped: 129

ANSWER CHOICES	RESPONSES	
Yes - please make sure that you have provided a contact number and/or email in the details above	72.12%	150
No	27.88%	58
<b>TOTAL</b>		<b>208</b>