



Further to your information request FOI/EIR 25/26-135, please find your question and our response below.

Request:

Ecology Capacity & Expertise

1. Would you like to receive the analyses of this nationwide benchmarking survey? If so, please tell us the email address of the person we should send the outputs to. **No**
2. How many in-house ecologists does your LPA have, in total (please state in number of Full-Time Equivalents (FTEs))? **2**
3. How many in-house ecologists does your LPA have, in roles working on assessing planning applications (please state in number of FTEs)? **2**
4. How many of your in-house ecologists have at least two years' professional experience working as an ecologist? **1**
5. Do you get ecological support from external advisors? If so, how many days'/ hours' support did you obtain in financial year 2024/25, and how much did this cost the LPA? **no**
6. Planning application fees increased significantly on 1 April 2025. How much of this additional funding do you plan to spend on improving your capacity to process BNG (e.g. on ecologists, other staff, software, other) **No plans to change at present.**

Pre-application advice

7. Do you offer Biodiversity Pre-Application advice as a paid-for service? **Yes**

Validation

8. Has your LPA introduced local validation requirements for BNG submissions, in addition to the national validation requirements? (Yes/No) If yes, please briefly outline these or provide a link to the relevant documentation. **YES**
9. Do you require that all planning applications subject to mandatory BNG include a Biodiversity Metric in its original Excel format (not another format such as pdf)? **As the statutory document Excel.**
10. Do you ensure that the Biodiversity Metric is a statutory version? If so, how? **Yes, in person validation and technical review.**
11. Do you ensure that the Biodiversity Metric has not been tampered with, for example by changing the Excel formulae? If so, how? **Asking for all tabs and cross reference with original, and using trained experts who can spot significant errors.**
12. Do you ensure that the Biodiversity Metric contains information about the baseline habitats and that this information does not contain any errors (such as incomplete rows or Excel formulae violations)? If so, how? **Ecologists check.**
13. Do you ensure that the area covered by the baseline information in the Biodiversity Metric matches the area within the red line boundary? If so, how? **Map visual checks, maps and redline on planning portal match, the application size matches the area in the metric and comparing aerial imagery and cross reference PEAs and other ecology or AIA reports.**
14. If an application claims the de minimis exemption from BNG, do you check whether the exemption applies before validating the application? If so, how? **Yes validation and technical ecologist review if needed.**
15. If an application claims the self-build / custom-build exemption from BNG, do you check whether the exemption applies before validating the application? If so, how? **No**

16. Since 1 January 2025, how many retrospective applications have you received, that if they had not been retrospective would have been subject to mandatory BNG? **3**

Determination/assessment

17. Prior to determining an application, do you check whether the biodiversity data and information submitted as part of the application create any concerns, for example risks to valuable habitats and/or unrealistic proposals? If so, how? If known at this stage **Yes at technical consultation with a trained ecologist.**
18. Prior to determining an application, do you make an assessment as to whether any on-site habitats are likely to be defined as significant (and therefore need to be secured)? If so, how? **Yes, at technical review to follow guidance.**
19. Prior to determining an application, do you make an assessment as to whether any legal instruments are likely to be required to secure habitats, such as planning conditions or Section 106 Agreements? If so, how? **Yes at technical review if significant must be secured.**
20. Prior to determining an application, do you seek information from the applicant as to how they plan to discharge the BNG condition? (E.g. through what combination of on-site BNG, off-site BNG, and statutory credits.) **yes**
1. Where the applicant is likely to have a shortfall of on-site BNG, do you proactively inform them of options for sourcing off-site Biodiversity Units? If so, how? **Yes if onsite change couldn't be achieved/or appropriate, give recommendations how they can offset their requirements within the LPA or NCA area making it clear they will need to prove why it is ecologically the best option to go further away.**
 2. Where the applicant is likely to have an on-site shortfall of less than 0.25 Biodiversity Units, do you proactively inform them that they are permitted to proceed straight to the use of statutory credits? If so, how? **NO. Local habitat banks have been developed in our LPA area to accept partial units to avoid this issue and help meet the mitigation hierarchy and enable the BNG market locally.**

Condition discharge

21. Prior to discharging the Biodiversity Gain deemed condition, do you check whether the condition discharge application includes a Biodiversity Metric in its original Excel format (not another format such as pdf)? If so, how? **Yes validation requirement to submit the statutory metric in a form that can be technically reviewed.**
22. Do you ensure that the Biodiversity Metric is a statutory version? If so, how? **Yes technical review & Validation check.**
23. Do you ensure that the Biodiversity Metric has not been tampered with, for example by changing the Excel formulae? If so, how? **Yes technical review & Validation check.**
24. Do you ensure that the Biodiversity Metric follows all of the BNG requirements for discharge, including that it contains no errors whatsoever unless the applicant has purchased statutory credits? If so, how? **Yes technical review**
25. If the applicant has purchased statutory credits as part of their approach to discharging the condition:
1. Do you ensure that the applicant had the LPA's permission, where necessary, to use statutory credits? If so, how? **Yes technical review.**
 2. Do you require proof of purchase of the statutory credits? **We would**
 3. Do you ensure that the applicant has purchased the correct numbers and types of statutory credits? If so, how? **Compare with the metric that the appropriate number of credits have been purchased with the confirmation of purchase of credits.**

Monitoring

26. What legal approach do you use to collect BNG monitoring fees from applicants (Section 106, Unilateral Undertaking, other please explain)? **S106**
27. Do you collect BNG monitoring fees in a single lump sum, or spread out over the 30 years? If spread out, on what schedule? **Both, depending on the scale of development.**

Enforcement

28. How do you inform applicants that planning permission is subject to the Biodiversity Gain deemed condition? E.g. is this listed as part of the main set of conditions, noted in a separate informative, or notified in some other way (please specify)? **Decision notice and detailed BNG response to help show applicant the next steps.**
29. Do you ensure that development does not commence without discharging the Biodiversity Gain deemed condition? If so, how? **No, we would enforce any breaches.**
30. Have any developments in your area, where permission was subject to the Biodiversity Gain deemed condition, commenced without discharging the condition? If so, please state how many and identify them e.g. by planning reference number. **Not that we are aware of.**

Biodiversity Duty Reporting

31. Has a specific officer or role been designated as responsible for preparing and delivering your LPA's Biodiversity Duty report, due in Q1 2026? (Yes/No) If yes, please state the job title responsible. **Senior Ecologist**
32. Does your LPA currently have software or specific digital tools in place to support the data collection and reporting requirements for the Biodiversity Duty? (Yes/No/Exploring Options). If yes, please provide the name of the tool(s). **Uniform & CMSI**

Response:

Please see the responses above in bold type.

This concludes your request FOI/EIR 25/26-135.

If information has been refused, please treat this as a Refusal Notice for the purposes of the Act.

If you disagree with our decision or are otherwise unhappy with how we have dealt with your request in the first instance you may approach foi@eastcambs.gov.uk and request a review. A request for review must be made in no more than 40 working days from the date of this email.

Should you remain dissatisfied with the outcome you have a right under s50 of the Freedom of Information Act to appeal against the decision by contacting the Information Commissioner, Wycliffe House, Water Lane, Wilmslow SK9 5AF.