

An aerial photograph of a residential area with a river and autumn foliage. The image shows a winding river in the upper left, surrounded by dense trees with yellow and orange autumn leaves. A dirt path runs along the riverbank. In the lower left, there is a residential street with several houses, parked cars, and green lawns. The overall scene is a mix of natural and built environments.

Scottish Local Planning Authority Ecological Expertise and Capacity Survey Report March 2022



CIEEM

Introduction

The purpose of the survey issued by CIEEM in collaboration with the Association of Local Government Ecologists (ALGE) is to establish current Local Planning Authority (LPA) ecological expertise and capacity in Scotland. The survey was issued as a follow-up to an event organised by CIEEM which brought together Scottish Local Planning Authorities to discuss the emerging NPF4, and specifically Policy 3 and the Developing with Nature Guidance; read the report [here](#).

Summary and Recommendations

Overall, we received responses from 26 of the 32 Local Planning Authorities and 2 National Park Authorities in Scotland (76%). We had multiple responses from some LPAs with 36 responses in total.

What was very apparent was that planning applications are dealt with differently by each LPA in Scotland. Some LPAs have ecologists that routinely comment on planning applications whereas 19% reported that they have no access to ecological expertise. Capacity is very low; over half of respondents (56%) said that there is less than 1 full time equivalent (FTE) ecologist available for planning work.

There appears to be real differences between LPAs in changes to staffing and resources in the last 5 years. One-third of respondents said there had been cutbacks to ecological provision within their LPA (either staffing or resources) over the past 5 years, with many others citing that cutbacks had happened prior to this. Encouragingly a few respondents reported that there has been a slight increase in personnel in the last few years.

Asked whether current resources will be adequate to assess whether an application will deliver positive effects for biodiversity under NPF4:

- **22% said they have no current ecological resource or expertise available**
- **31% said they do not have adequate capacity to deal with the existing planning workload**
- **31% said only if other biodiversity work within the council is reduced**
- **11% said current expertise and resources will be adequate**
- **6% said capacity is increasing so will be able to provide more support and advice for planners and increased scrutiny of planning applications**

Capacity concerns were common throughout with gaps in ecological and planning staff highlighted. Ecological capacity was highlighted as a bigger concern than expertise. Lack of enforcement staff to ensure compliance was highlighted as a big concern with two-thirds of respondents rating it as a high or very high risk to their LPA's ability to implement NPF4 and Positive Effects for Biodiversity.

We recommend that each Local Authority should have as a bare minimum ecologists and environmental planners who are adequately resourced and trained. Without in-house ecological expertise in local authorities, positive effects for biodiversity cannot be assessed and delivered in a consistent way throughout Scotland.

This report may be cited as:

CIEEM (2022). Report on Survey of Scottish Local Planning Authority Ecological Capacity and Expertise. Survey issued by CIEEM in collaboration with the Association of Local Government Ecologists (ALGE).



Full Survey Responses

1. What Local Authority do you work at? Number of respondents shown.

Aberdeen City Council	2	East Renfrewshire Council	1	North Lanarkshire	1
Aberdeenshire Council	2	Edinburgh	2	Perth and Kinross Council	1
Angus Council	2	Falkirk Council	1	Scottish Borders Council	1
Cairngorms National Park Authority	1	Fife Council	2	South Lanarkshire	1
Comhairle nan Eilean Siar	2	Glasgow City Council	3	Shetland Islands Council	1
Dumfries and Galloway Council	1	Highland Council	1	Stirling	1
Dundee City Council	1	Loch Lomond and Trossachs	1	West Dunbartonshire Council	1
East Dunbartonshire	1	Midlothian	1	West Lothian Council	2
East Lothian	2	Moray	1		

2. What is your Job Title?

Of the respondents 28% were planners/planning officers, 11% were environment(al) planners and 19% were biodiversity officers.

Job title	Number of Respondents
Planner/Planning Officer	10
Biodiversity Officer	7
Environment(al) Planner	4
Greenspace Officer/Manager	3
Ecologist	2
Ecology and Biodiversity Officer	2
Natural Environment Officer (Biodiversity and Ecology)	1
Other (Please specify)	
Development Management Coordinator	1
Lead Officer (Sustainable Development)	1
Tree and Biodiversity Officer	1
Natural Heritage Officer	2
Environment Officer	1
Team Leader Environment & Climate Change	1

3. Do you hold any ecological qualifications?

Twenty-three (64%) respondents hold an ecological qualification with 13 (36%) holding no ecological qualifications. Of the 13 respondents who don't hold ecological qualifications, 8 were planners/planning officers. There is clearly an ecological skills gap within the planning system and responses to question 14 detail many of the training requirements. The expertise and expectations of planning and ecological staff needs to be clear so that individuals are not having to make professional judgements outside their area of expertise and competence.

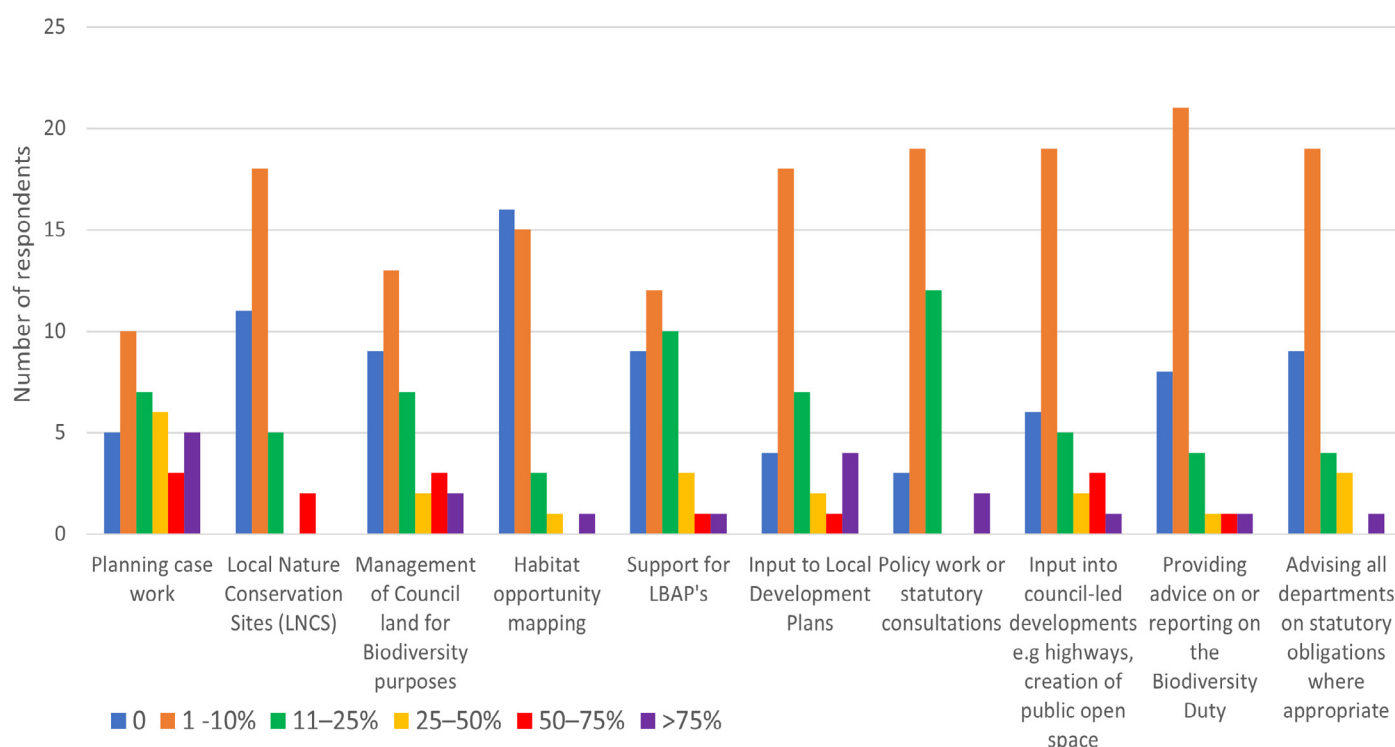
4. What proportion of your total time is involved with the following areas of work?

There was a lot of variability between respondents in the proportion of total time staff input to a range of council services. Planning case work is only one component across a very wide portfolio of work with capacity stretched thinly or areas of work not addressed. Just over a fifth of respondents said that planning case work occupies over half of their time with a further 17% reporting that it accounted for between a quarter and half of their time.

Other areas of work, accounting for more than 10% of respondents time, includes management of Council land for biodiversity purposes, support for LBAP's, input to Local Development Plans, and policy work/statutory consultations. What is clear is that most respondents cover a very wide number of duties which collectively take up their time.

Other areas of work beyond those shown in the graph below were outdoor access, working with communities on Biodiversity-based projects consultation, responses to woodland creation schemes, felling permissions, long-term forestry plans and forestry Environmental Impact Assessment (EIA) scoping requests.

Proportion of total time involved with different areas of work



5. How does your authority currently access ecological expertise in relation to planning applications?

The majority of respondents said that they do have an in-house ecologist. The team that in-house ecologists work within was noted as an issue (e.g. "There is an ecologist but not in planning team, so planning work not defined in work plan resulting in conflicting demands from managers.") Service level agreements were principally via contracts with local biodiversity record centres to screen planning applications against records of notable species. This screening of planning applications against biological records is incredibly valuable to highlight protected species and species of conservation concern but there is not complete geographic coverage of record centres throughout Scotland and even where they do exist not all are of sufficient size to provide this service. No-one reported that ecologists were shared between LPAs and only 6% seek ecological advice from consultants. Worryingly, seven respondents (19%) reported that they

have no access to ecological expertise. One noted that they do have very limited access to advice from the ranger service.

Methods by which LPAs currently access ecological expertise

	No.	%*
In-house ecologist	22	61
Ecologist shared with another LPA	0	0
Service level agreement with another organisation - Local Biological Records Centre	4	11
Contracted through consultants	2	6
No access to ecological expertise	7	19
Other		
Environmental Planners with natural heritage expertise	2	6
Greenspace Officer	1	3

* Percentages exceed 100% where respondents listed multiple sources for accessing ecological expertise.

As we had multiple responses from some LPAs we also looked at the data at LPA level however this resulted in a only few percentage change in some of the categories.

6. Have there been any cutbacks to ecological provision within your LPA (either staffing or resources) over the past 5 years?

There appears to be real differences between LPAs in changes to staffing and resources in the last 5 years and even prior to this. One-third of respondents said there had been cutbacks. For example:

- *"We lost our Biodiversity officer a number of years ago (possibly more than 5 years ago)."*
- *"Biodiversity, Ecology, Access and Ranger positions now all one 'Environment Officer'."*
- *"Additional duties added to current post such as forestry consultations and more focus on tree protection".*
- *"Reduction from full time biodiversity officer to 0.6FTE. Reduction in ranger service, currently no rangers."*
- *"Access and Ecology combined, and ranger posts lost."*
- *"Ecologist is no longer in a position to assist on development management biodiversity issues."*

Two-thirds of respondents said that there had been no cutbacks over the last 5 years, and of these a number said cuts had happened more than 5 years ago. For example:

- *"Cuts occurred over 5 years ago when the Biodiversity officer stopped handling planning casework due to a lack of capacity."*
- *"No cutbacks in staff in last 5 years, but significant staff cutbacks prior to that, and budgets decreased in last 5 years."*

Encouragingly, 3 LPAs reported a slight increase in staffing or funding. However, this often redresses shortfalls in the past, e.g., *"Funding for biodiversity post has only been implemented in the last year and it has been 10 years since we last had a biodiversity officer"*.

7. What is your Local Authority's current ecological capacity? (Expressed as full time equivalent (FTE) ecologists available for planning work)

This data is from perspective of the individual rather than at LPA level. It is not possible to express it at an LPA level due to different categories being selected by respondents within the same LPA. These differences may be due to differing viewpoints from planners and ecologists.

LPA's current ecological capacity

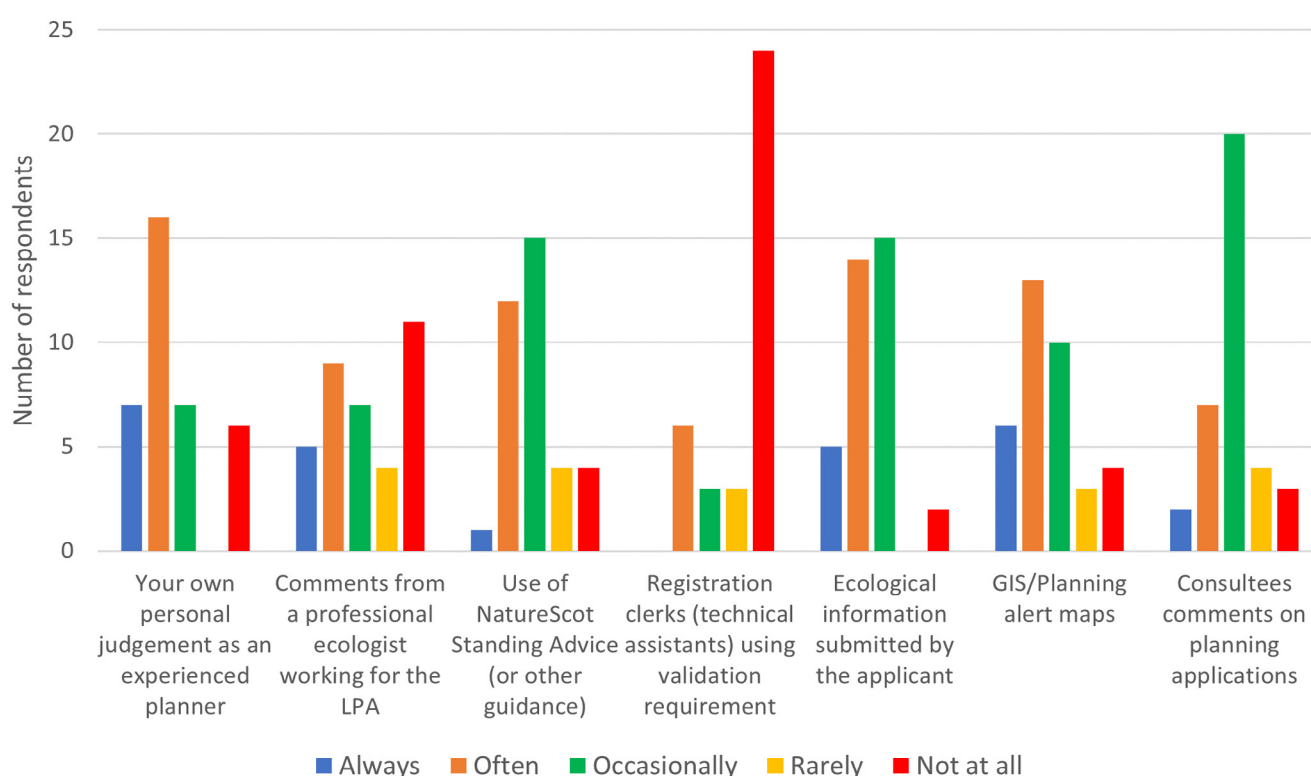
Current ecological capacity? (Expressed as full time equivalent (FTE) ecologists available for planning work)	Number of respondents	% of respondents
<1	20	56
1	8	22
2	3	8
3	3	8
4	1	3
>4	1	3

8. Are current ecological resources adequate for current workload?

On a scale of 1 to 10 with 1 being "no current capacity" to 10 being "all applications that affect biodiversity are adequately scrutinised" the average score was 4.6 and the mode was 3 (most common response).

9. How do you normally identify whether an application is likely to affect biodiversity?

Personal judgement as an experienced planner was cited most in identifying whether an application is likely to affect biodiversity. Ecological information submitted by the applicant and GIS/planning alert maps are also frequently used, closely followed by comments from a professional ecologist working for the LPA.



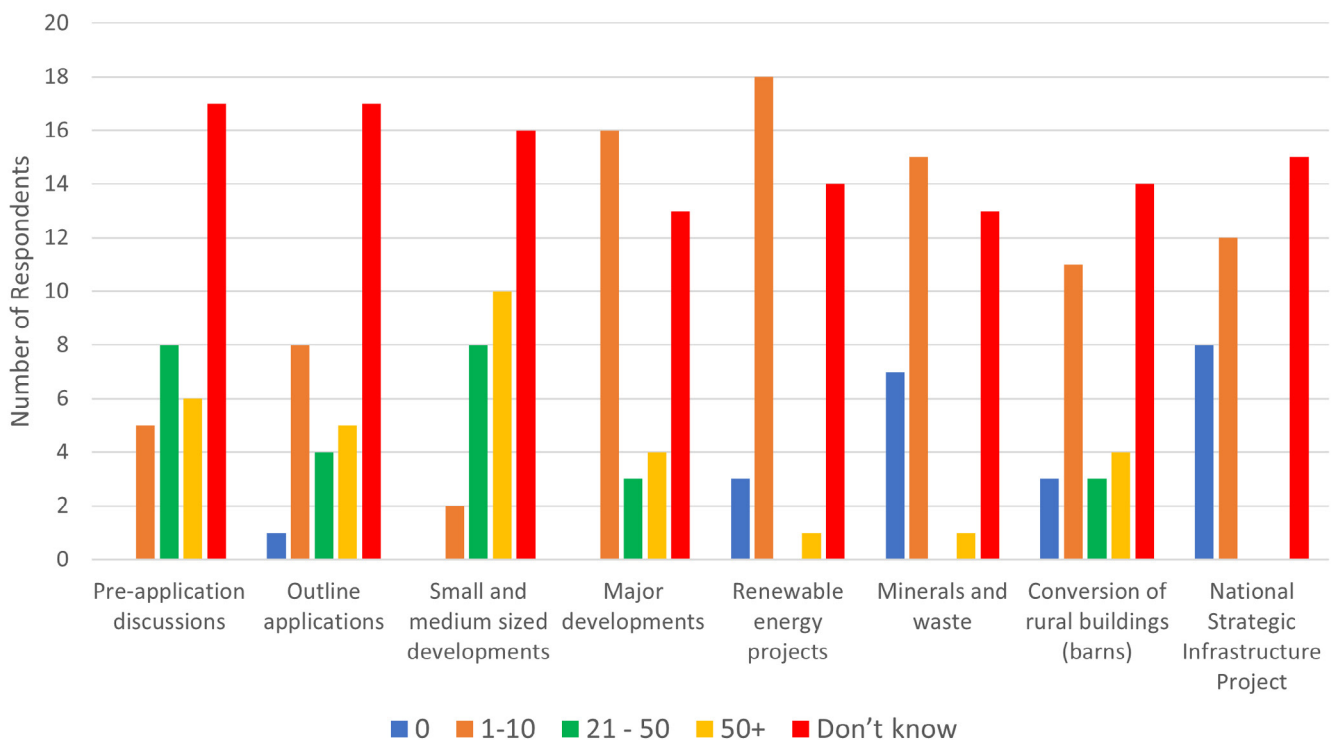
From the comments provided, different approaches are adopted. Planning officers often speak to biodiversity officers, environmental planners or greenspace officers for advice. This may be a formal process i.e. planners are provided with a set of criteria which then trigger a consultation to Environment Planners (ecologists), via consultation requests for applications that they think needs ecological input, or less formalised queries. A few respondents said they check weekly planning lists to try and catch any applications that haven't been sent to them as the ecological

implications haven't been recognised. This is usually in relation to building work that may affect bats. Local record centre searches are used in a few cases as part of the constraint check process and provided to planners for consideration. This is of course restricted to the areas that have local record centres, and even then, ones of sufficient size to provide this support.

10. 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)?

Unsurprisingly, small- and medium-sized developments account for the largest numbers of applications. The number of pre-application discussion and outline applications are also fairly numerous.

Number of applications per year where biodiversity is a material consideration



11. In your opinion, to what extent will your current resources be adequate to assess whether an application will deliver positive effects for biodiversity and NPF4? [Please indicate which you believe best fits your situation].

	No of respondents (%)
Capacity is increasing so will be able to provide more support and advice for planners and increased scrutiny of planning applications	2 (6%)
Current expertise and resources will be adequate	4 (11%)
Only if other biodiversity work within the council is reduced	11 (31%)
We do not have adequate capacity to deal with the existing planning workload	11 (31%)
We have no current ecological resource or expertise available	8 (22%)

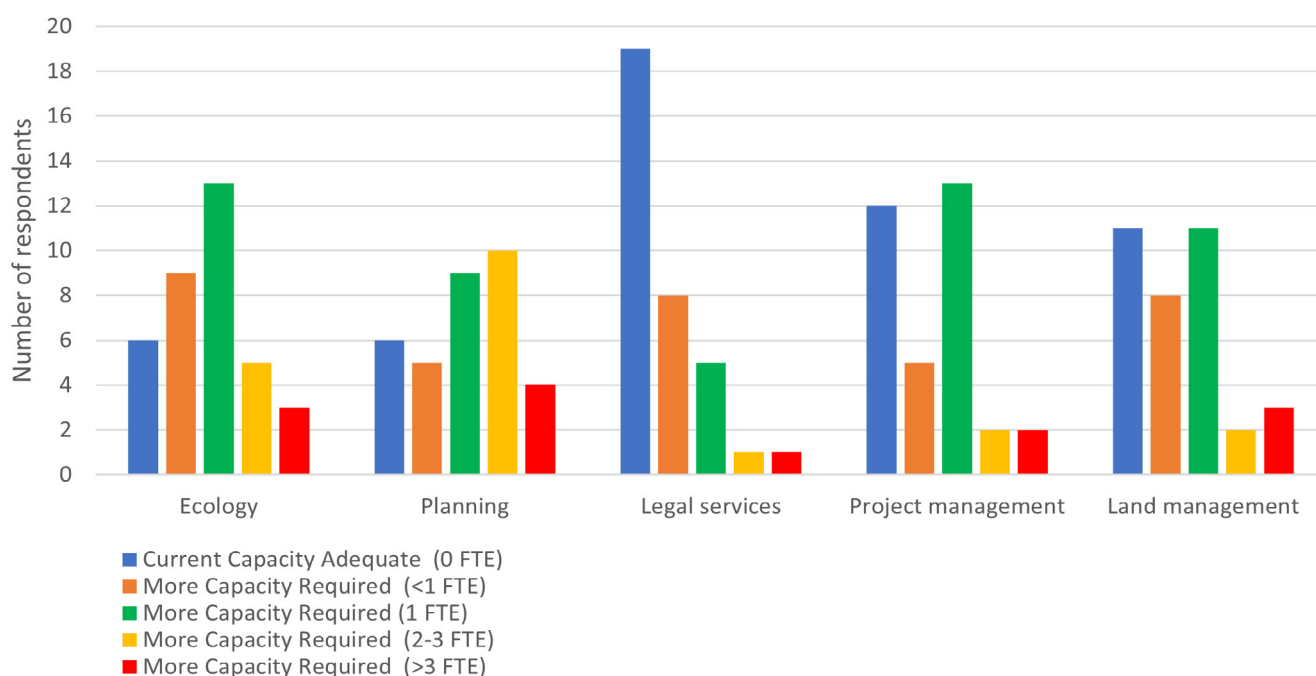
Percentage of respondents



12. In terms of expertise, overall, please indicate where current staff resources will be adequate or where new staff resources will be required to deliver NPF4 and Positive Effects for Biodiversity? (Additional capacity expressed as new full time equivalents FTE)

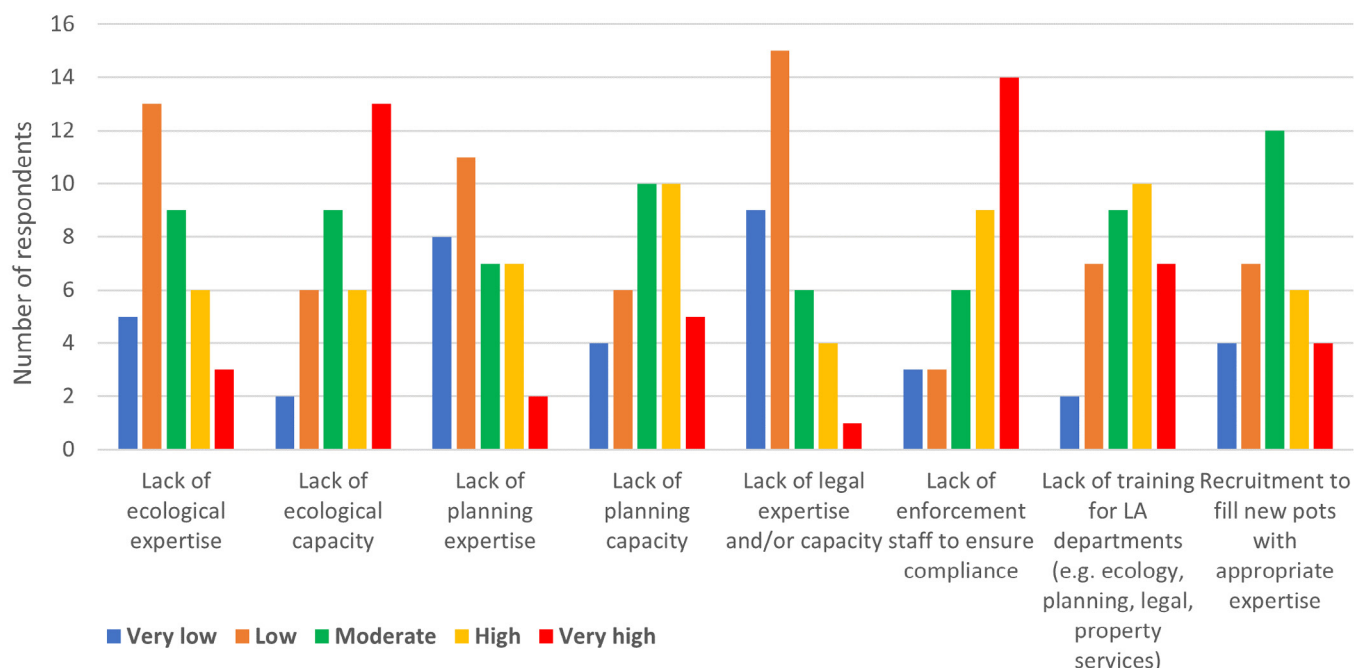
Current capacity for ecology and planning is deemed to be adequate in only 17% of cases whereas for land management, project management and legal services 31%, 33% and 53% of respondents respectively said current staff capacity is adequate.

Staff resources required to deliver NPF4 and Positive Effects for Biodiversity expressed as full time equivalents (FTE)



13. To what extent are the following staffing issues a risk to your LPA's ability to implement NPF4 and Positive Effects for Biodiversity?

In terms of ecological provision, 53% of respondents said lack of ecological capacity was a high or very high risk to their LPA's ability to implement NPF4 and Positive Effects for Biodiversity. Ecological capacity was highlighted as a bigger concern than ecological expertise. Lack of enforcement staff to ensure compliance was also highlighted as a big concern with two-thirds of respondents rating it as a high or very high risk.



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

For the full list of training suggested by respondents please see Appendix 1. Key points highlighted were:

- Training on nature conservation legislation and the processes required to consider and enhance biodiversity through the planning system targeted at planners, architects and planning consultants.
- Training on how to interpret biodiversity information and apply it through the planning system.
- Assessment and implementation of biodiversity net gain targets/metrics, framework for securing positive effects.
- Training on detail of new legislation and implementation of NPF4 and Developing with Nature.
- Training in tools used to assess 'appropriate' and 'proportionate' biodiversity enhancement and use of conditions and agreement of long-term management.
- Training for consultant ecologists to raise standard of ecological submissions through planning process.
- Cross-cutting training on flood management, greening for adaptation, GIS skills, mapping and monitoring.

CIEEM, NatureScot, RTPI, Landscape Institute, Scottish Government, Local Records Centres were all listed as potential delivery mechanisms for providing training, with joint training delivery proposed by some.

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

Many of the comments raised echoed those at the LPA event held and can be viewed in the event [report](#).

For the full list of priorities for support and guidance from the Government please see Appendix 1. Key points highlighted were:

Capacity and Expertise

- Need in house ecological expertise and qualified planning staff with relevant biodiversity knowledge.
- More resources for Planning Enforcement Officers to ensure tree protection and biodiversity enhancement measures are realised.
- Without an increase in staffing and other resources in LAs the onus will need to be on the developer to carry out appropriate site surveys, provide plans and deliver.
- Upskilling via targeted cross-cutting training as highlighted in question 14 responses.

Policy

- As it currently stands NPF4 is too weak and imprecise and will not allow local planning authorities to be able to make developers provide meaningful biodiversity enhancements; requires a simple metric to measure Biodiversity Net Gain.
- Adoption of a standardised approach using metrics that can be consistently applied and associated guidance developed.
- Increased objectivity that comes with net gain type tools. The fear is that without this, every case becomes a battle where LPA's are having to have significant intervention every time to secure the appropriate enhancements.

Guidance

- Clear guidance on how positive effects should be measured and expectations from developers.
- The proposed guidance is okay - a good menu for what you could do to enhance development proposals. What's appropriate/expected at what scale is really left open to interpretation.
- Guidance on how to monitor post implementation of any enhancement.

Links to other policies

- A requirement for a clear, resourced biodiversity strategy, understanding of the different positions of Local Authorities. There must be a legislative requirement for LBAP's and these must be funded.
- Greater recognition of and statutory protection for priority habitats and LNCS.
- Links to Forest and Woodland Strategy guidance and update of very outdated European protected species guidance.

16. Are there any other support/advice networks that you currently find useful, or you think could be developed?

For a full listing see Appendix 1. Networks were highlighted as being very important, especially if working as a sole ecologist in LPA. Professional bodies listed include CIEEM and RTPI both for networks and information sharing as well as Heads of Planning Scotland. ALGE, Biodiversity Officers Network and informal local networks with neighbouring authorities were highlighted as invaluable to share learning and experience.

17. Any other comments?

- Need a framework for securing 'positive effects'
- Urgently need a green infrastructure monitoring officer' who would sit within enforcement and concentrate on implementation of biodiversity enhancement measures on the ground.
- CIEEM is an excellent source of information. NatureScot standing advice to planners is also very detailed and useful. It can be difficult to gain approval from LPA employer to pay for membership of ALGE and CIEEM.
- The link between SBS, Nature Restoration Fund and NPF4 is weak, and they seem to be being pursued separately.
- We would benefit from an arboricultural officer to lead on a new TPO review and to provide technical advice to the planning department and to operational teams on how best to manage the existing resource and to develop the new tree planting projects.

Thank you to everyone who responded to this survey.

<https://cieem.net/>

<https://www.alge.org.uk/>

Appendix 1

Additional Comments and responses on questions 14 to 17

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

- Training for development management team and ecologist to advise developers
- Assessment and implementation of biodiversity net gain targets. Training in GIS Skills, mapping and monitoring. Specialist's and experts with relevant backgrounds.
- What we need is a framework for securing 'positive effects'. The NPF and supporting advice does not give us this. This was made abundantly clear at the January LPA meeting held by CIEEM.
- NatureScot and improvement service training on new duties would be useful.
- BNG, carbon calculating for NBS projects, developing local nature index, multiple benefits SuDS
- training on metrics for applying to new applications to help judge when an application is actually achieves positive benefits.
- Training which cuts across biodiversity gains, greening for adaptation, flooding, and other multiple benefits. Perhaps joint training across RTPI, Landscape Institute and Nature Scot.
- Identifying key Habitats and issues, Assessment of Ecological and Habitats Surveys, on legislation including Habitats Regulations Appraisals
- Guidance and training manuals/sessions prepared and delivered by experts (whoever they are)
- Further training in the detail of new legislation will be important to planners, ecologists and legal staff
- Scottish Government, Improvement Service
- Training for Councillors and senior staff. In house training maybe or respected third party. Not Nature Scot.
- Training for planners, architects and planning consultants in the basics of nature conservation legislation and the processes required to consider and enhance biodiversity through the planning system. CIEEM are probably best placed to deliver this.
- Training in how to interpret biodiversity information and apply it through the planning system - particularly with reference to identify which positive effects for biodiversity are appropriate - again for planners, agents and applicants. This would go some way to reduce the pressure on LPA ecologists. RTPI/CIEEM/Local Records Centres/NatureScot could deliver this?
 - There also needs to be additional training for consultant ecologists to raise the standard of ecological submissions through the planning process. This is a huge issue, adds significantly to the workload, and delays planning decisions. If we are about to see biodiversity enhancement delivered through the planning system there needs to be appropriate training for ecologists to understand what is required and how best to deliver it. CIEEM are well placed to deliver this, but then many ecologists do not engage with CIEEM so I don't know how we reach these people.
- Once NPF4 is in place, it will require significant skilling up across all staff
- Planning course need to have more on the ecologic aspect of planning. CPD for planners.
- Climate change, building standards, public health experts all required. We will try to find them in house where possible.
- Training in tools used to assess 'appropriate' and 'proportionate' Biodiversity enhancement through development. ScotGov or NatureScot.

- How to connect ecology to different types of planning applications and what solutions to offer applicants
- Training for planners in biodiversity
- an environmental planner is required with the relevant up to date knowledge
- Training for interpretation and application of ecological surveys within planning proposals - CIEEM?
- How important the Highlands are for biodiversity. This could be provided by the current ecology team
- Guidance available is generic and need for training relevant to the LA their priority species and habitats.
- What is meant by biodiversity enhancement and how this can be realised by the planning system through use of conditions, Section 75 agreements etc. NatureScot possibly best to deliver bringing together planning staff and ecological staff from NatureScot. One big question needs explained - how do we know we are enhancing biodiversity without ensuring monitoring is carried out and reported back to the LPA.
- "Condition writing and agreement of long-term management. Planning officers will need significant on line resources available if they are to determine if an application delivers positive effects for biodiversity.
- At this stage though the requirements are not clear or defined so not possible to identify training requirements"
- On how biodiversity gain will be delivered and what tools/knowledge Planners need to be able to make assessments.
- i would like to see emphasis on flood management and case based evidence to exemplify good practice in incorporating biodiversity friendly nature based solutions to this problem. Without this technical expertise it is difficult for planners and flood management strategies to come on board with this.
- Statutory obligations regarding wildlife legislation - training for planners.
- General awareness of habitats and species awareness of monitoring on sites and assessment procedures.

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

Many of the comments raised here echoed those raised at the LPA event held and can be viewed in the [event report](#).

Capacity

- Need planning graduates to keep system functioning - system close to failing due to lack of qualified staff applying for jobs.
- Resources to create staff posts to deliver on biodiversity gain, planning expertise and policy shifts. We're woefully under resourced
- Financial support for in house ecological expertise
- Capacity and resources a critical issue.
- Financial support to enable increased capacity. Clear guidance on how positive effects should be measured and what should be expected from developers.
- Funding for specialist staff resource, potentially shared between Councils.
- Funding for officer posts
- More resources for Planning Enforcement Officers to ensure tree protection and biodiversity enhancement measures are realised. Explanation of how biodiversity enhancement can be realised.
- A requirement for a clear, resourced biodiversity strategy. There is requirement to clearly understand the different positions of Local Authorities, especially those without an active LBAP. There must be a legislative requirement for LBAPs and these must be funded.

- Without an increase in staffing and other resources in LAs the onus will need to be on the developer to carry out appropriate site surveys, provide plans and deliver.
- Direct financing

Expertise

- That LA must employ ecological planners with relevant biodiversity knowledge
- Practical training
- Staff resources, guidance docs and training

Policy and Guidance

- That Scottish Government amend their draft NPF4 policy that is currently out for consultation in February 2022 as it requires a simple metric to measure Biodiversity Net Gain as occurs in England and as it currently stands, it is too weak and imprecise and will not allow local planning authorities be able to make developers provide meaningful biodiversity enhancements to essential development sites.
- Recent discussions have highlighted that guidance and tools are key. The proposed guidance is okay - a good menu for what you could do to enhance development proposals. What's appropriate/expected at what scale is really left open to interpretation. It's clear many want the increased objectivity that comes with net gain type tools - I'd agree with that. The fear is that without this, every case becomes a battle where LPA's are having to have significant intervention every time to secure the appropriate enhancements.
- NPF4 providing the framework and clout for maximum biodiversity benefits from the outset.
- More guidance on how to measure ecological/biodiversity enhancement with development proposals and on how to monitor post implementation of any enhancement.
- "Support and guidance for what? Not clear what the requirement to deliver positive effects for biodiversity will be.
- Make policy stronger in NPF4. Gathering of baseline data on habitat. Make Nature Scot responsible for enforcing carrying out of Habitat Regulation Appraisals where they should be carried out, and for maintaining a register of them.
- Biodiversity metric across all LA and appropriate support to implement/
- Ensuring enough measures are put in for the scale of the project
- Equivalent detailed guidance on the starting point of protecting existing biodiversity. Use of simple, clear metrics such as Urban Greening Factor, which can be used by non-experts and again delivers across different objectives of biodiversity, adaptation, etc.
- Access to detailed guidance and perhaps someone external who could be consulted when necessary.
- Spatial planning for biodiversity. Metric for delivering biodiversity enhancements. Greater recognition of and statutory protection for priority habitats and LNCS
- Depends if a metric is introduced in approved NPF4, case studies work well.
- Government guidance on positive effects for biodiversity which gives weight to the Nature Scot guidance, to support policy 3e of NPF4 linked to Local Biodiversity Action Plan Guidance - to give them more weight. Forest and Woodland Strategy guidance, update of European protected species guidance now very out of date
- Statutory backing for biodiversity enhancement in NPF4 supported by a realistic way of implementing this such as BNG.
- Adoption of a standardised approach using metrics that can be consistently applied and associated guidance developed
- The requirement to deliver positive effects for biodiversity must apply to all developments and specifically include aquaculture.
- There must be a clear framework for how the current ecological value of a site is assessed to allow positive effects for biodiversity to be measured.
- to provide a policy that has some more grip to it than the current proposed Developing with Nature Guidance. If the policy is more explicit then it becomes easier and more practical

to implement. To provide an allocated funding stream for LA's instead of having to spend officer time on grant applications for biodiversity projects. Provision of staff. In our circumstance the biodiversity officer is involved in the planning consultation stage, strategy development such as new designations, LBAP writing as well as project deliver, surveys and community-based work. A very broad brush as opposed to a specific source of technical information.

16. Are there any other support/advice networks that you currently find useful or you think could be developed?

- Professional bodies and academic institutions
- Biodiversity partnership could help more
- ALGE Knowledge Hub is interesting but would be more relevant to me if more Scottish LPA ecologists and biodiversity officers were members.
- LBAPO
- Definitely the LBAP officers network but also others.
- Updates on Legislation and Best Practice/Guidance.
- RTPi Scotland, Heads of Planning Scotland
- I currently actively participate in ALGE, Biodiversity Officers Network and also in informal local networks with neighbouring authorities to share learning and experience. These networks are invaluable as the sole ecologist within my local authority. I would also value greater opportunities for dialogue between LPA ecologists/biodiversity and consultant ecologists to provide informal advice on a local/regional scale.
- I have worked with SEPA's fish ecologists and river morphologists who have been excellent. The GCVGN is good too.
- I work with other LA planning authorities who have staff who deal with ecological matters. I think there should be a wider group across Scotland particularly in light of Policy 3 Nature crisis in NPF4. This should be separate from the biodiversity officer network as not all biodiversity officer deal with planning.
- Local records centres networks. LBAP network.
- Advice from Fife Coast and Countryside Trust is limited by their capacity. Advice from other partner organisations is ad hoc, though very helpful.
- Glasgow Clyde Valley Green Network
- CIEEM is an excellent source of information. NatureScot standing advice to planners is also very detailed and useful. The same type of approach to biodiversity enhancement info is required.
- CIEEM - Scottish Network, HOPs, LBAP Network
- Biodiversity Network, CIEEM, AECOW
- Direct updates from government on legislation

17. Any other comments?

- "In terms of resources we urgently need a 'green infrastructure monitoring officer' who would sit within enforcement and concentrate on implementation of biodiversity enhancement measures on the ground.
- What we need is a framework for securing 'positive effects'. The draft NPF and supporting advice does not give us this. This was made abundantly clear at the meeting in January that what is proposed will simply put further pressure on overstretched LA staff. "
- While there is no substitute for ecological eyes on an application, not having in-house expertise can to some degree be balanced by having high quality surveys conducted during the preparation of the LDP. Biodiversity data held on GIS will help planning officers make better decisions.
- The Biodiversity Officers do not sit within the Planning department - we are situated in the Parks Development Team so have answered the consultation as accurately as possible. There are no ecologists/environmental planners.

- CIEEM is an excellent source of information. NatureScot standing advice to planners is also very detailed and useful. The same type of approach to biodiversity enhancement info is required. In relation to question 18, it can be difficult to gain approval from LPA employer to pay for membership of ALGE and CIEEM. I didn't realise there was a Local Biodiversity Officer Network, does this cover all of UK? The Scottish Tree Officers Group is an excellent source of information and support and the same for biodiversity would be excellent. Although the biodiversity and climate crises have never been higher on the agenda politically and among the general public, gaining more resources in money or staff is very difficult.
- The link between SBS, Nature Restoration Fund and NPF4 is weak and they seem to be being pursued separately. Really need to be strongly linked to provide framework for taking the stalled IBAP process forward.
- We would benefit from an arboricultural officer to lead on a new TPO review and to provide technical advice to the planning department and to operational teams on how best to manage the existing resource and to develop the new tree planting projects.

THE CHARTERED INSTITUTE OF ECOLOGY AND ENVIRONMENTAL MANAGEMENT (CIEEM) IS THE LEADING PROFESSIONAL BODY FOR ECOLOGISTS AND ENVIRONMENTAL MANAGERS WORKING TO MANAGE AND ENHANCE THE NATURAL ENVIRONMENT IN THE UK AND IRELAND.

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