

Summary of Findings

Online Survey of Local Authority Ecologists by the Association of Local Government Ecologists May 2016

1. Introduction

- **1.1.** During May 2016 ALGE conducted an online survey of its members (using Survey Monkey) to establish the extent to which the members believe that ecological reports that are submitted in support of planning applications are 'fit for purpose'.
- **1.2.** 57 ALGE members from England and Wales responded to the survey, although all members across the UK were invited to participate.
- **1.3.** When responding to many of the questions, ALGE members were asked to allocate the proportion of ecological reports that they receive to the following categories, where an issue would be considered to be:

| ٠ | 'rarely' | encountered if involving | <24% | of reports received |
|---|-----------------|--------------------------|--------|---------------------|
| ٠ | 'sometimes' | " | 25-49% | " |
| ٠ | 'often' | ** | 50-69% | " |
| • | 'regularly' | " | >75% | " |
| • | 'almost always' | " | 90% | " |

- 1.4. ALGE will use the results from the survey, in collaboration with partner organisations, to identify common or widespread issues with ecological reporting that consequently result in poor or inadequate information being submitted to the local planning authority.
- 1.5. ALGE and its partners will review the results of the survey with the aim of identifying measures that are capable of addressing the issues and problems encountered so as to raise the consistency and quality of ecological reports entering the planning system.

2. Results

2.1. A full pdf summary of the results from online Survey Monkey is also available on the ALGE website.

3. Main Findings and Discussion

- 3.1. Presented below are the main findings from the survey along with a little discussion around the implications of the results for some of the questions.
- 3.2. Snap shot of findings:

As a general observation, the results show huge variation in the quality of ecological reports received by local planning authorities and their in-house ecological advisors.

- Q.2 Many ecological reports pay insufficient regard to the mitigation hierarchy.
- Q.3 Many PEAs are still submitted in support of planning applications with recommendations that further surveys and/or details of mitigation measures be provided at a later date.
- Q.4 Many EclAs appear to be 'fit for purpose' although a large proportion of respondents to the survey report that they do receive a significant of poor quality reports that do not initially provide adequate information to determine the planning application.
- Q.5 While many reports appear to follow good practice guidance there is huge variation with significant proportion of the reports received deviating from such guidance.
- Q.6 A large proportion of ecological reports do not adequately describe the methods used to undertake surveys or to assess impacts.
- Q.7 A small proportion of reports include comprehensive interpretation of desk study data but a large proportion provide poor or no interpretation of such information. At worst, simple lists from desk studies are included as long appendices.
- Q.8 Habitats and protected species are reported comparatively well, although priority species are not well recorded or accounted for, and little or no information is normally provided on ecosystem services
- Q.9 Virtually no reference is made to limitations imposed by lack of resources, personal competence, inadequate time spent surveying, use of old and out of date data, departures from good practice guidance, unrealistic deadlines, unproven or untested methods / activities.
- Q.10 As a generality, it appears that ecological reports from large consultancies appear to be better structured and formatted than those from smaller consultancies and in turn these are generally better than reports received from sole traders.
- Q.11 A large proportion of reports provide inadequate certainty over findings and/or recommendations.
- Q.12 There is huge variation in providing adequate information to enable recommendations to be easily secured through planning conditions.
- Q13 A very large proportion of reports and applicants still hope/expect that further surveys will be provided through planning conditions once consent is granted despite this being contrary to Government Advice (e.g. ODPM Circular 06/2005)
- Q.14 Reports do generally make clear whether an EPS licence will be required.
- Q.15 Local authority ecologists are more likely to recommend use of an Ecological Clerk of Works than staff in the SNCOs. Some consultants are also very proactive over ECoWs.
- Q.16 Over 80% of LPA ecologists believe ECoWs can make a significant contribution to the success of mitigation during construction.
- Q.17 In assessing impacts there is wide variation in the quality of the work and also in conformity with CIEEM guidance (e.g. EcIA guidelines)
- Q.18 The three most notable problems encountered by LPA ecologists appear to be inadequate or missing ecological surveys, inadequate proposals for mitigation and compensation, and a disproportionate amount of time taken dealing with just one or two poor consultancies.

Q2. Use of the Mitigation Hierarchy

Q. How often do ecological reports that you receive follow and present information consistent with the mitigation hierarchy in a manner that is adequate or good?

Nearly a fifth of respondents 'rarely' receive reports that cover the mitigation hierarchy adequately.

According to 33% of respondents, only 25-49% of reports received adequately cover the hierarchy.

However, 26% of respondents state that between 50-69% of reports received adequately cover the hierarchy.

Only 23% of respondents report that they 'regularly' or 'almost always' receive reports that adequately refer to the mitigation hierarchy.

Q3. Submission of PEA in Support of Planning Applications

Q. Members were asked three questions about how often they receive PEAs that state that more surveys or details of mitigation will/should be provided at a later date and whether the PEAs received are adequate to determine the application.

A large proportion respondents (60%) report that between 50-75% of PEAs submitted with planning applications still recommend further ecological surveys be carried out and/or that further details on mitigation still needs to be provided.

37% of respondents report that between 50-69% of PEAs received are adequate to determine the application.

39% of respondents report that only 25-49% of PEAs received are adequate to determine the application.

Only 17% of respondents report that more than 75% of the PEAs they receive are adequate to determine the application.

Q4. Submission of EcIA in Support of Planning Applications

Q. How often do you receive an EcIA that contains adequate information to determine the application without asking for further details or information – except for details which might reasonably be secured at a later date through a planning condition?

31% of respondents 'regularly' or 'almost always' receive adequate EcIAs (e.g. >75% of the reports received)

34% of respondents report that between 50-69% of EcIAs received are initially adequate to determine the application.

31% of respondents report that only 25-49% of EcIAs received are initially adequate to determine the application.

Less than 4% of respondents reported that they rarely receive adequate EcIAs.

Q5. EcIAs and PEAs and their Consistency with Good Practice

Q. Members were two questions relating to how well ecological reports conform to CIEEM's guidelines on PEAs and EcIAs.

Approximately 20% of respondents reported that PEAs and EcIAs generally conform well with the CIEEM guidance.

However, nearly 60% report that some elements are not consistent with the guidance.

Between 12-14% report that PEAs and EclAs tend to be quite poor.

A small proportion (6k-8%) of respondents reported that they could not comment because they are unfamiliar with the CIEEM guidance

Q6. Full Disclosure of Scientific Methods

Q. Are the methods used in ecological reports relating to surveys and assessments adequate to enable somebody else to replicate the work?

| | Almost always (>90%) | Regularly (>75%) | Often (50- 74%) | Sometimes (25-49%) | Rarely (<45%) |
|--|----------------------------|---------------------|-----------------------|-----------------------|------------------|
| Very well - somebody else could easily and accurately replicate the | 0.00% | 14.29% | 28.57% | 39.29% | 17.86% |
| work using the methods described | 0 | 8 | 16 | 22 | 10 |
| Well - somebody could replicate the work although there may be | 1.85% | 12.96% | 53.70% | 25.93% | 5.56% |
| variation due to lack of detail in the original methods provided | 1 | 7 | 29 | 14 | 3 |
| An experienced professional might be able to use the methodology | 5.66% | 16.98% | 33.96% | 33.96% | 9.43% |
| but someone inexperienced might struggle | 3 | 9 | 18 | 18 | 5 |
| Poor - the methods are written without providing sufficient details to | 0.00% | 9.62% | 5.77% | 59.62% | 25.00% |
| enable somebody to replicate the work accurately and easily | 0 | 5 | 3 | 31 | 13 |
| Very poor - Lip service is paid to this section of the report or no methods are presented at all | 0.00% | 1.89% | 1.89% | 35.85% | 60.38% |
| | 0 | 1 | 1 | 19 | 32 |

The general impression from the results set out above is that there is plenty of room for improvement in the presentation and description of methods used for ecological surveys and impact assessment.

Also, there is an alarming proportion of respondents (36%) that report that between 25-49% of the ecological reports they receive pay only lip service to this requirement.

At best, just over 40% of respondents report that between 50-75% of reports they receive describe the methods used sufficiently well to enable somebody else to repeat the work accurately if necessary.

Q7. Results from Desk Studies

Q. This question presented members with a range of scenarios spanning 'comprehensive review and interpretation of the results from desk studies' through to 'the source of desk study data is provided accompanied by long lists of data prints outs but with little or no interpretation'.

| | Almost always (>90%) | Regularly (>75%) | Often (50- 74%) | Sometimes (25-49%) | Rarely (<24%) |
|---|----------------------------|---------------------|-----------------------|--------------------|------------------|
| here is comprehensive review and interpretation of the results from | 1.89% | 3.77% | 26.42% | 35.85% | 32.08% |
| esk studies and these have been used well in subsequent work | 1 | 2 | 14 | 19 | 1 |
| ome attempt has been made to review and interpret the results from | 5.45% | 21.82% | 25.45% | 36.36% | 10.919 |
| esk studies but better use could have been made of the information | 3 | 12 | 14 | 20 | |
| he source of data searches have been provided as well as long lists of | 9.09% | 27.27% | 16.36% | 40.00% | 7.27 |
| ata print outs (e.g. as an appendix) with little or no interpretation and ubsequent use | 5 | 15 | 9 | 22 | |
| he source of data searches have been provided but little else | 0.00% | 3.85% | 19.23% | 34.62% | 42.31 |
| | 0 | 2 | 10 | 18 | 1 |

The results to Question 7 are mixed but suggest that the overall use of the results from desk studies are not adequately interpreted nor made full use of in subsequent work.

Only 6% of respondents said more than 75% of the reports received provided detailed interpretation of desk study results.

It also appears that an alarming proportion of ecological reports provide little else but the source of desk study data.

Q8. Presentation of Ecological Results - Description of Baseline Conditions and Features That Might be Affected by Development

Q. This question asked members to identify which baseline conditions and features are most commonly reported.

| | Almost always | Regularly | Often (50- | Sometimes | Rarely |
|---|---------------|---------------|---------------|---------------|---------------|
| | (>90%) | (>75%) | 74%) | (25-49%) | (<24%) |
| Habitat features are reported adequately? | 12.50% | 28.57% | 35.71% | 23.21% | 0.00% |
| | 7 | 16 | 20 | 13 | 0 |
| Details on protected species are reported adequately? | 7.14% | 48.21% | 35.71% | 8.93% | 0.00% |
| | 4 | 27 | 20 | 5 | 0 |
| Other priority species are reported adequately? | 1.79% | 7.14% | 23.21% | 44.64% | 23.21% |
| | 1 | 4 | 13 | 25 | 13 |
| Details of important ecosystem services are | 0.00% | 0.00% | 0.00% | 14.55% | 85.45% |
| reported adequately? | 0 | 0 | 0 | 8 | 47 |

What emerges from the answers to this question is that information relating to habitats and protected species is reasonably well reported, but information relating to priority species is much less well considered. And there is currently virtually no information provided on ecosystem services.

Of further concern is the fact that just over a third of respondents report that less than half of the reports they receive address habitats and species adequately.

Q9. Identifying Limitations on Ecological Methods and Work

Q. This question asked members to identify how well ecological reports deal with the various limitations that may diminish the value or accuracy of its findings and recommendations.

| | Almost always (>90%) | Regularly (>75%) | Often (>50-74%) | Sometimes (25-49%) | Rarely (<24%) |
|--|-------------------------|---------------------|--------------------|--|------------------|
| Limitations associated with personal competence | 0.00% | 3.51% | 0.00% | 7.02% | 89.47% |
| | 0 | 2 | 0 | 4 | 51 |
| Limitations associated with inadequate resources | 0.00% | 1.75% | 0.00% | 14.04% | 84.21% |
| | 0 | 1 | 0 | (25-49%) (4 7.02% 4 14.04% 8 28.07% 16 40.35% 23 38.60% 22 30.36% 17 23 35.09% 24 24 | 48 |
| Limitations associated with inadequate time spent | 0.00% | 3.51% | 8.77% | 28.07% | 59.65% |
| surveying | 0 | 2 | 5 | 16 | 34 |
| Limitations associated with inadequate data (e.g. | 1.75% | 3.51% | 10.53% | 40.35% | 43.86% |
| ncomplete or inappropriate surveys) | 1 | 2 | 6 | 23 | 25 |
| Limitations associated with old and out of date data | 1.75% | 0.00% | 5.26% | 38.60% | 54.39% |
| | 1 | 0 | 3 | 22 | 31 |
| Limitations associated with timing or seasonal constraints | 5.36% | 14.29% | 44.64% | 30.36% | 5.36% |
| | 3 | 8 | 25 | 17 | 3 |
| Limitations associated with partial use and/or departures | 0.00% | 3.51% | 10.53% | 35.09% | 50.88% |
| from good practice guidelines | 0 | 2 | 6 | 20 | 29 |
| Limitations associated with adverse weather conditions | 3.57% | 5.36% | 30.36% | 42.86% | 17.86% |
| | 2 | 3 | 17 | 24 | 10 |
| Limitations associated with unrealistic deadlines | 0.00% | 5.26% | 3.51% | 12.28% | 78.95% |
| | 0 | 3 | 2 | 7 | 4 |
| Limitations associated with unproven or untested methods | 1.75% | 0.00% | 1.75% | 3.51% | 92.98% |
| or measures/activities | 1 | 0 | 1 | 2 | 53 |

What is obvious from the answers above is that 'seasonal constraints' are reported most frequently, but there is a woeful lack of reporting in relation to most other forms of limitation.

There is virtually no reference to limitations imposed by lack of resources or personal competence (89% and 84% respectively of reports rarely include this).

And over 50% of respondents report that five other types of limitation are rarely discussed, including:

- Inadequate time spent surveying
- Use of old and out of date data
- Departures from good practice guidance
- Unrealistic deadlines
- Unproven or untested methods / activities

Q10. Structure, Content and Format of Ecological Reports

Q. This question examined whether there is any difference in the quality of reporting between large, medium-sized and small ecological consultancies.

| | Strongly agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree |
|---|----------------|---------------|-------------------------------|---------------|----------------------|
| On balance ecological reports tend to be well structured and formatted by large consultancies | 12.50% | 55.36% | 26.79% | 5.36% | 0.00% |
| | 7 | 31 | 15 | 3 | 0 |
| On balance ecological reports tend to be well structured by small consultancies | 0.00% | 39.29% | 50.00% | 10.71% | 0.00% |
| | 0 | 22 | 28 | 6 | 0 |
| On balance ecological reports tend to be well structured by sole traders | 0.00% | 16.07% | 51.79% | 26.79% | 5.36% |
| | 0 | 9 | 29 | 15 | 3 |

There is a strong perception amongst respondents that ecological reports received from large ecological consultancies tend to be better structured and formatted than from smaller practices.

The overall impression from a large proportion of respondents is that the larger consultancies provide better structure/formatted reports than medium-sized consultancies and both are better than small consultancies such as sole traders.

The results suggest that there is a major quality issue to address with the reports submitted by sole traders.

Q11. Certainty and Confidence in Ecological Reports

Q. Ecological reports submitted with planning applications provide adequate certainty and provide confidence in the findings and recommendations (e.g. they state that things will be done as opposed to only should or could be carried out).

Nearly 80% of respondents claim that less than half of all ecological reports received provide adequate certainty over either the findings or recommendations.

At best, only 18% of respondents state ecological reports 'often' provide adequate certainty (i.e. between 50-69% of the reports that they receive).

Lack of certainty within ecological reports therefore appears to be a significant issue.

Q12. Adequate Information to Shape Appropriate Planning Conditions

Q. Adequate information is provided in ecological reports that can be used to easily shape appropriate conditions to secure necessary mitigation, compensation and enhancement.

Only 18% of respondents report that they 'almost always' or 'regularly' receive adequate to easily shape appropriate planning conditions to secure necessary mitigation etc.

Whereas 34% of respondents report that between 50-69% of ecological reports received are fit for this purpose

And 34% of respondents report that only 25-49% of ecological reports received are fit for this purpose.

And nearly 15% of respondents report that they rarely received adequate information for this purpose.

Q13. Use of Conditions to Specify Further Survey Work

Q. While Govt guidance states that conditions should only be used to secure further survey work in exceptional circumstances, applications are still received where this is requested/expected by the applicant.

The general impression from answers to this question is that applicants still commonly expect deficiencies in initial survey work to be addressed through planning conditions once consent has been granted.

For instance, 35% of respondents report that over 75% of the applications they receive still expect that further survey work can conditioned.

A similar proportion of respondents (37%) report that between 50-69% of applications received expect further surveys to be conditioned.

And 25% of respondents state that this occurs with up to 49% of the applications they deal with.

Less than 4% of respondents reported that they rarely receive such applications.

Q14. Requirements for European Protected Species Licences

Q. Ecological reports provide clear and adequate information to establish easily whether or nto a European Protected Species licence will also be required

The overall impression with answers to this question is that ecological reports tend to do quite well in providing information to identify the need for an EPS licence.

For instance, 38% of respondents report that at least 75% of the applications received provide sufficient information for this purpose.

And 28% of respondents stated that over 50% of ecological reports received have this information, although 21% of respondents stating that they receive such information for only 25-49% of reports.

Q15. Recommended Use of an Ecological Clerk of Works (ECoW)

Q. This question asked members to identify who normally recommends the employment of an Ecological Clerk of Works.

| | Almost always | Regularly | Often | Sometimes | Rarely |
|--|-------------------|--------------------|---------------------|---------------------|--------------------|
| I recommend the use of an ECoW on sensitive sites and secure these through an appropriate planning condition or obligation? | 17.54% | 21.05% | 24.56% | 28.07% | 8.77% |
| | 10 | 12 | 14 | 16 | 5 |
| Ecological consultancies recommend the use of an ECoW on sensitive sites and provide adequate information to inform their role and remit as part of the planing application (e.g. as part of the mitigation during construction)? | 3.51% 2 | 14.04% 8 | 21.05% 12 | 50.88% 29 | 10.53% 6 |
| Statutory bodies recommend the use of an ECoW on sensitive sites as | 0.00% | 3.92% | 0.00% | 9.80% | 86.27% |
| part of their consultation response? | 0 | 2 | 0 | 5 | 44 |

ALGE members are clearly engaged with the importance of the ECoW role and nearly 40% of respondents report that they 'almost always' or 'regularly' recommend the use of ECoW during construction. And over 50% do so 'sometimes' or 'often', whereas less than 10% report that they 'rarely' recommend their use.

In stark contrast, staff in statutory bodies 'rarely' (86%) recommend the use of an ECoW.

Q.15 continued

ALGE members' experience with ecological consultancies indicates that many consultancies are much more aware (than statutory bodies) of the value of this role and are more likely to recommend employment of an ECoW.

Q16. Effective Use of an ECoW

Q. I believe that the use of an ECoW could dramatically increase the implementation and effectiveness of mitigation measures during the construction process and possibly assist with measure post construction.

There is overwhelming support for the ECoW role, with over 80% of respondents stating that they 'strongly agree' or 'agree' that the use of an ECoW can dramatically improve the effectiveness of mitigation during construction.

Q17. Assessment of Ecological Impacts

Q. This question asked members to identify the extent to which they think the assessment of impacts is undertaken based on a sound scientific approach, whether it follows the CIEEM EcIA Guidelines and whether it departs from good practice guidance.

| | Almost Always | Regularly | Often | Sometimes | Rarely |
|--|-------------------|---------------------|---------------------|---------------------|-------------------|
| A comprehensive assessment of impacts based on a sound scientific approach is used to establish likely impacts on valuable ecological receptors? | 1.79% 1 | 25.00% 14 | 35.71% 20 | 33.93% 19 | 3.57% 2 |
| Impact assessment appears to follow the CIEEM EcIA Guidelines? | 7.41% 4 | 27.78% 15 | 33.33% 18 | 29.63% 16 | 1.85% 1 |
| Impact assessment does not follow published good practice guidance and leaves some uncertainty around the results - which requires further more detailed information to be provided? | 0.00% 0 | 5.45% 3 | 25.45% 14 | 60.00% 33 | 9.09% 5 |

From the above results it is clear that ALGE respondents believe there is widespread variation in the way consultancies follow the Institute's guidance.

60% of respondents report that up to 50% of the reports that they receive may not follow good practice guidance, and a further 25% state that between 50-69% may deviate from such guidance.

However, 25% of respondents believe that >75% of the reports they receive include a comprehensive assessment of impacts based on a sound scientific approach. Another 36% believe that between 50-69% of the reports they receive contain a sound assessment of impacts, and another 34% believe that between 25-49% of the reports adequate in this respect.

Q18. What Common Issues with Ecological Reports Give You the Most Problems?

Q. ALGE members were asked to rank the issues in the left hand column to identify which give them most problems.

| Issue | | | | | | Ran | king | | | | | | |
|--|---------------------|---------------------|--------------------|--------------------|--------------------|---------------------|--------------------|--------------------|---------------------|---------------------|--------------------|-------------------|------|
| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | N/A |
| Inadequate or missing ecological surveys | 29.09% 16 | 12.73% 7 | 5.45% 3 | 10.91% 6 | 9.09% 5 | 3.64% 2 | 9.09% 5 | 5.45% 3 | 3.64% 2 | 0.00% 0 | 5.45% 3 | 3.64% 2 | 1.8 |
| No data searches | 3.85% 2 | 11.54% 6 | 7.69% 4 | 11.54% 6 | 11.54% 6 | 1.92% 1 | 7.69% 4 | 13.46% 7 | 7.69% 4 | 13.46% 7 | 5.77% 3 | 1.92% 1 | 1.9 |
| Poor initial scoping | 1.89% 1 | 5.66% 3 | 7.55% 4 | 9.43% 5 | 7.55% 4 | 11.32% 6 | 11.32% 6 | 13.21% 7 | 5.66% 3 | 13.21% 7 | 11.32% 6 | 0.00% 0 | 1.8 |
| Poor assessment of ecological impacts | 9.26% 5 | 9.26% 5 | 11.11% 6 | 9.26% 5 | 3.70% 2 | 18.52% 10 | 16.67% 9 | 7.41% 4 | 5.56% 3 | 7.41% 4 | 1.85% 1 | 0.00% 0 | 0.0 |
| Inadequate proposals for necessary mitigation and compensation | 7.14% 4 | 17.86% 10 | 14.29% 8 | 12.50% 7 | 8.93% 5 | 10.71% 6 | 12.50% 7 | 5.36% 3 | 3.57% 2 | 3.57% 2 | 0.00% 0 | 3.57% 2 | 0.0 |
| Little or no recommendations for enhancements (net gain) | 3.77% 2 | 9.43% 5 | 9.43% 5 | 13.21% 7 | 15.09% 8 | 15.09% 8 | 5.66% 3 | 5.66% 3 | 13.21% 7 | 1.89% 1 | 7.55% 4 | 0.00% 0 | 0.0 |
| Poor structure and format of ecological reports - so the key facts are difficult to find/confirm | 11.11% 6 | 0.00% 0 | 9.26% 5 | 9.26% 5 | 11.11% 6 | 12.96% 7 | 14.81% 8 | 9.26% 5 | 7.41% 4 | 9.26% 5 | 3.70% 2 | 0.00% 0 | 1.8 |
| Limitations on methods and work are not reportedly adequately | 0.00% 0 | 7.14% 4 | 7.14% 4 | 10.71% 6 | 12.50% 7 | 10.71% 6 | 1.79% 1 | 10.71% 6 | 17.86% 10 | 12.50% 7 | 7.14% 4 | 0.00% 0 | 1.7 |
| PEAs are submitted when in fact an EcIA is required | 10.00% 5 | 6.00% 3 | 6.00% 3 | 2.00% 1 | 4.00% 2 | 2.00% 1 | 6.00% 3 | 10.00% 5 | 10.00% 5 | 20.00% 10 | 14.00% 7 | 4.00% 2 | 6.0 |
| Just one or two ecological consultancies regularly submit poor work and take up a disproportionate amount of time | 16.67% 9 | 7.41% 4 | 12.96% 7 | 7.41% 4 | 7.41% 4 | 9.26% 5 | 11.11% 6 | 3.70% 2 | 3.70% 2 | 3.70% 2 | 7.41% 4 | 5.56% 3 | 3.7 |
| Non compliance with published good practice guidance (e.g. for ecological surveys) | 3.64% 2 | 9.09% 5 | 9.09% 5 | 7.27% 4 | 10.91% 6 | 1.82% 1 | 5.45% 3 | 16.36% 9 | 12.73% 7 | 7.27% 4 | 16.36% 9 | 0.00% 0 | 0.0 |
| Other ? | 3.13% | 3.13% | 0.00% | 0.00% | 0.00% | 3.13% | 0.00% | 3.13% | 0.00% | 3.13% | 6.25% | 37.50% | 40.6 |

A visual impression of the overall results for Q.18 is provided in Figure 1 on the next page.

Figure 1 Overview - Degree to Which Issues Present a Problem to ALGE Members

Inadequate or missing ecological surveys

No data searches

Poor initial Scoping

Poor Assessment of ecological impacts

Inadequate proposals for necessary mitigation and compensation

Little or no recommendations for enhancements

Poor structure and format of reports

Limitations on methods and work are not reported adequately

PEAs are submitted when in fact an EcIA is required

Just one or two ecological consultancies regularly submit poor work and take up a disproportionate amount of time

Non-compliance with published good practice guidance

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Other

Two prominent problems identified above are fundamental to the determination of any planning application; these relate to:

- The submission of inadequate or missing ecological survey information;
- Inadequate proposals for necessary mitigation and compensation;

And consequently, these two issues are likely to result in:

- a large degree of uncertainty over what biodiversity features are likely be affected by a development proposal, and;
- whether proposed mitigation is adequate to ensure that there are unlikely to be any significant residual effects.

In turn, these issues are likely to lead to delay and a requirement to submit further information to support the application.

A further notable problem identified through Q.18 is the disproportionate amount of time just one or two problem ecological consultancies can cause by regularly submitting poor work.

Q2 Use of the Mitigation Hierarchy in EclAs

| | Almost Always (>90%) | Regularly (>75%) | Often (50- 69%) | Sometimes (25-49%) | Rarely (<24%) | Total | Weighted Average |
|--|----------------------------|---------------------|-----------------------|--------------------|------------------|-------|---------------------|
| How often do the ecological reports that you receive normally follow and | 1.75% | 21.05% | 26.32% | 33.33% | 17.54% | | |
| present information consistent with the Mitigation Hierarchy in a manner that you would consider to be adequate or good? | 1 | 12 | 15 | 19 | 10 | 57 | 3.44 |

Q3 Submission of Preliminary Ecology Appraisals (PEA) in Support of Planning Applications

| | Almost always (>90%) | Regularly (>75%) | Often (50- 69%) | Sometimes (25-49%) | Rarely (<24%) | Total | Weighted Average |
|---|----------------------------|---------------------|-----------------------|-----------------------|------------------|-------|---------------------|
| I receive PEAs that recommend further ecological surveys be carried out | 3.57% | 35.71% | 23.21% | 32.14% | 5.36% | | |
| although these are actually required before determination of the application? | 2 | 20 | 13 | 18 | 3 | 56 | 3.00 |
| I receive PEAs that state that further details on mitigation measures | 0.00% | 28.57% | 32.14% | 30.36% | 8.93% | | |
| should be provided to address particular impacts and effects (but these are not included within the PEA)? | 0 | 16 | 18 | 17 | 5 | 56 | 3.20 |
| I receive PEAs that contain adequate information to determine the | 1.79% | 17.86% | 37.50% | 39.29% | 3.57% | | |
| application? | 1 | 10 | 21 | 22 | 2 | 56 | 3.25 |

Q4 Submission of Ecological Impact Assessments (EcIA) in the Support of Planning Applications

| | Almost always (>90%) | Regularly (>75%) | Often (50- 69%) | Sometime (25-49%) | Rarely (<24%) | Total | Weighted Average |
|---|----------------------------|---------------------|-----------------------|----------------------|------------------|-------|---------------------|
| How often do you receive an EcIA that contains adequate information to | 3.64% | 27.27% | 34.55% | 30.91% | 3.64% | | |
| determine the application without asking for further details or information - except for details which might reasonably be secured at a later date through a planning condition(s)? | 2 | 15 | 19 | 17 | 2 | 55 | 3.04 |

Q5 EcIAs and PEAs and their Consistency with Good Practice

| | Very well | Generally consistent | Some elements are not consistent | Generally quite poor | Very poor | I can't comment because I am unfamiliar with the CIEEM guidance on PEAs | I can't comment because I am unfamiliar with the CIEEM guidance on ecological report writing | Total | Weighted Average |
|---|-------------------|-------------------------|---|----------------------------|-------------------|--|---|-------|---------------------|
| Overall, how well do PEAs that you receive follow CIEEM guidance on PEAs? | 0.00% 0 | 21.43% 12 | 57.14% 32 | 12.50% 7 | 0.00% 0 | 8.93% 5 | 0.00% 0 | 56 | 3.18 |
| Overall, how well do the EclAs that you receive follow CIEEM guidance on Ecological Report Writing? | 0.00% 0 | 22.22% 12 | 57.41% 31 | 14.81% 8 | 0.00% 0 | 0.00% 0 | 5.56% 3 | 54 | 3.15 |

Q6 Full Disclosure of Scientific Methods -Are the methods used in ecological reports relating to surveys and assessments adequate to enable somebody else to replicate the work?



| | Almost always (>90%) | Regularly (>75%) | Often (50- 74%) | Sometimes (25-49%) | Rarely (<45%) | Total | Weighted Average |
|---|----------------------------|---------------------|-----------------------|-----------------------|---------------------|-------|---------------------|
| Very well - somebody else could easily and accurately replicate the work using the methods described | 0.00% 0 | 14.29% 8 | 28.57% 16 | 39.29% 22 | 17.86% 10 | 56 | 4.6 |
| Well - somebody could replicate the work although there may be variation due to lack of detail in the original methods provided | 1.85% 1 | 12.96% 7 | 53.70% 29 | 25.93% 14 | 5.56% 3 | 54 | 4.2 |
| An experienced professional might be able to use the methodology but someone inexperienced might struggle | 5.66% 3 | 16.98% 9 | 33.96% 18 | 33.96% 18 | 9.43% 5 | 53 | 4.2 |
| Poor - the methods are written without providing sufficient details to enable somebody to replicate the work accurately and easily | 0.00% 0 | 9.62% 5 | 5.77% 3 | 59.62% 31 | 25.00% 13 | 52 | 5.0 |
| Very poor - Lip service is paid to this section of the report or no methods are presented at all | 0.00% 0 | 1.89% 1 | 1.89% 1 | 35.85% 19 | 60.38% 32 | 53 | 5.5 |

Q7 Results from Desk Studies

| | Almost always (>90%) | Regularly (>75%) | Often (50- 74%) | Sometimes (25-49%) | Rarely (<24%) | Total | Weighted Average |
|--|----------------------------|---------------------|-----------------------|--------------------|------------------|-------|---------------------|
| There is comprehensive review and interpretation of the results from | 1.89% | 3.77% | 26.42% | 35.85% | 32.08% | | |
| desk studies and these have been used well in subsequent work | 1 | 2 | 14 | 19 | 17 | 53 | 3.92 |
| Some attempt has been made to review and interpret the results from | 5.45% | 21.82% | 25.45% | 36.36% | 10.91% | | |
| desk studies but better use could have been made of the information | 3 | 12 | 14 | 20 | 6 | 55 | 3.25 |
| The source of data searches have been provided as well as long lists of | 9.09% | 27.27% | 16.36% | 40.00% | 7.27% | | |
| data print outs (e.g. as an appendix) with little or no interpretation and subsequent use | 5 | 15 | 9 | 22 | 4 | 55 | 3.09 |
| The source of data searches have been provided but little else | 0.00% | 3.85% | 19.23% | 34.62% | 42.31% | | |
| | 0 | 2 | 10 | 18 | 22 | 52 | 4.1 |

Q8 Presentation of Ecological Results -Description of Baseline Conditions and Features That Might be Affected by Development

| | Almost always (>90%) | Regularly (>75%) | Often (50- 74%) | Sometimes (25-49%) | Rarely (<24%) | Total | Weighted Average |
|---|-------------------------|---------------------|--------------------|-----------------------|------------------|-------|---------------------|
| Habitat features are reported adequately? | 12.50% | 28.57% | 35.71% | 23.21% | 0.00% | | |
| | 7 | 16 | 20 | 13 | 0 | 56 | 2.70 |
| Details on protected species are reported | 7.14% | 48.21% | 35.71% | 8.93% | 0.00% | | |
| adequately? | 4 | 27 | 20 | 5 | 0 | 56 | 2.46 |
| Other priority species are reported adequately? | 1.79% | 7.14% | 23.21% | 44.64% | 23.21% | | |
| | 1 | 4 | 13 | 25 | 13 | 56 | 3.80 |
| Details of important ecosystem services are | 0.00% | 0.00% | 0.00% | 14.55% | 85.45% | | |
| reported adequately? | 0 | 0 | 0 | 8 | 47 | 55 | 4.85 |

Q9 Identifying Limitations on Ecological Methods and Work - To What Extent are the Following Limitations Well Reported?



| | Almost always (>90%) | Regularly (>75%) | Often (>50-74%) | Sometimes (25-49%) | Rarely (<24%) | Total | Weighted Average |
|--|-------------------------|---------------------|--------------------|-----------------------|------------------|-------|---------------------|
| Limitations associated with personal competence | 0.00% | 3.51% | 0.00% | 7.02% | 89.47% | | |
| | 0 | 2 | 0 | 4 | 51 | 57 | 4.82 |
| Limitations associated with inadequate resources | 0.00% | 1.75% | 0.00% | 14.04% | 84.21% | | |
| | 0 | 1 | 0 | 8 | 48 | 57 | 4.81 |
| Limitations associated with inadequate time spent | 0.00% | 3.51% | 8.77% | 28.07% | 59.65% | | |
| surveying | 0 | 2 | 5 | 16 | 34 | 57 | 4.44 |
| Limitations associated with inadequate data (e.g. | 1.75% | 3.51% | 10.53% | 40.35% | 43.86% | | |
| incomplete or inappropriate surveys) | 1 | 2 | 6 | 23 | 25 | 57 | 4.21 |
| Limitations associated with old and out of date data | 1.75% | 0.00% | 5.26% | 38.60% | 54.39% | | |
| | 1 | 0 | 3 | 22 | 31 | 57 | 4.44 |
| Limitations associated with timing or seasonal constraints | 5.36% | 14.29% | 44.64% | 30.36% | 5.36% | | |
| | 3 | 8 | 25 | 17 | 3 | 56 | 3.16 |
| Limitations associated with partial use and/or departures | 0.00% | 3.51% | 10.53% | 35.09% | 50.88% | | |
| from good practice guidelines | 0 | 2 | 6 | 20 | 29 | 57 | 4.33 |
| Limitations associated with adverse weather conditions | 3.57% | 5.36% | 30.36% | 42.86% | 17.86% | | |
| | 2 | 3 | 17 | 24 | 10 | 56 | 3.66 |
| Limitations associated with unrealistic deadlines | 0.00% | 5.26% | 3.51% | 12.28% | 78.95% | | |
| | 0 | 3 | 2 | 7 | 45 | 57 | 4.65 |
| Limitations associated with unproven or untested methods | 1.75% | 0.00% | 1.75% | 3.51% | 92.98% | | |
| or measures/activities | 1 | 0 | 1 | 2 | 53 | 57 | 4.86 |

Q10 Structure, Content and Format of Ecological Reports

| | Strongly agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree | Total | Weighted Average |
|--|----------------|--------|-------------------------------|----------|----------------------|-------|---------------------|
| On balance ecological reports tend to be well structured and | 12.50% | 55.36% | 26.79% | 5.36% | 0.00% | | |
| formatted by large consultancies | 7 | 31 | 15 | 3 | 0 | 56 | 2.25 |
| On balance ecological reports tend to be well structured by | 0.00% | 39.29% | 50.00% | 10.71% | 0.00% | | |
| small consultancies | 0 | 22 | 28 | 6 | 0 | 56 | 2.7 |
| On balance ecological reports tend to be well structured by sole | 0.00% | 16.07% | 51.79% | 26.79% | 5.36% | | |
| traders | 0 | 9 | 29 | 15 | 3 | 56 | 3.2 |

Q11 Certainty and Confidence in Ecological Reports

| | Almost always | Regularly | Often | Sometimes | Rarely | Total | Weighted Average |
|---|-------------------|-------------------|---------------------|---------------------|---------------------|-------|---------------------|
| Ecological reports submitted with planning applications provide adequate certainty and provide confidence in the findings and recommendations (e.g. they state that things will be done as opposed to only should or could be carried out)? | 0.00% 0 | 3.64% 2 | 18.18% 10 | 47.27% 26 | 30.91% 17 | 55 | 4.05 |

Q12 Adequate Information to Shape Appropriate Planning Conditions

| | Almost always | Regularly | Often | Sometimes | Rarely | Total | Weighted Average |
|--|------------------|-----------|--------|-----------|--------|-------|---------------------|
| Adequate information is provided in ecological reports that can be used | 1.79% | 16.07% | 33.93% | 33.93% | 14.29% | | |
| easily to shape appropriate conditions to secure necessary mitigation, compensation and enhancements? | 1 | 9 | 19 | 19 | 8 | 56 | 3.43 |

Q13 Use of Conditions to Specify Further Survey Work

| | Almost always | Regularly | Often | Sometimes | Rarely | Total | Weighted Average |
|---|------------------|-----------|--------|-----------|--------|-------|---------------------|
| While Govt advice states that conditions should only be used to secure | 0.00% | 35.09% | 36.84% | 24.56% | 3.51% | | |
| further survey work in exceptional circumstances, applications are still received where this is requested/expected by the applicant? | 0 | 20 | 21 | 14 | 2 | 57 | 2.96 |

Q14 Requirements for European Protected Species Licences

| | Almost always | Regularly | Often | Sometimes | Rarely | Total | Weighted Average |
|---|------------------|-----------|--------|-----------|--------|-------|---------------------|
| Ecological reports provided clear and adequate information to establish | 12.28% | 38.60% | 28.07% | 21.05% | 0.00% | | |
| easily whether or not a European Protected Species licence will also be required? | 7 | 22 | 16 | 12 | 0 | 57 | 2.58 |

Q15 Recommended Use of an Ecological Clerk of Works (ECoW)

| | Almost always | Regularly | Often | Sometimes | Rarely | Total | Weighted Average |
|--|---------------------|---------------------|---------------------|---------------------|---------------------|-------|---------------------|
| I recommend the use of an ECoW on sensitive sites and secure these through an appropriate planning condition or obligation? | 17.54% 10 | 21.05% 12 | 24.56% 14 | 28.07% 16 | 8.77% 5 | 57 | 2.89 |
| Ecological consultancies recommend the use of an ECoW on sensitive sites and provide adequate information to inform their role and remit as part of the planing application (e.g. as part of the mitigation during construction)? | 3.51% 2 | 14.04% 8 | 21.05% 12 | 50.88% 29 | 10.53% 6 | 57 | 3.51 |
| Statutory bodies recommend the use of an ECoW on sensitive sites as part of their consultation response? | 0.00% 0 | 3.92% 2 | 0.00% 0 | 9.80% 5 | 86.27% 44 | 51 | 4.78 |

Q16 Effective Use of an ECoW

| | Strongly Agree | Agree | Neither Agree nor Disagree | Disagree | Strongly Disagree | Total | Weighted Average |
|---|-------------------|--------|-------------------------------------|----------|----------------------|-------|---------------------|
| I believe that the use of an ECoW could dramatically increase the | 55.36% | 26.79% | 17.86% | 0.00% | 0.00% | | |
| implementation and effectiveness of mitigation measures during construction and possibly assist with measures post construction too? | 31 | 15 | 10 | 0 | 0 | 56 | 1.63 |

Q17 Assessment of Ecological Impacts

| | Almost Always | Regularly | Often | Sometimes | Rarely | Total | Weightee Average |
|---|------------------|-----------|--------|-----------|--------|-------|---------------------|
| comprehensive assessment of impacts based on a sound scientific | 1.79% | 25.00% | 35.71% | 33.93% | 3.57% | | |
| pproach is used to establish likely impacts on valuable ecological aceptors? | 1 | 14 | 20 | 19 | 2 | 56 | 3.1 |
| npact assessment appears to follow the CIEEM EcIA Guidelines? | 7.41% | 27.78% | 33.33% | 29.63% | 1.85% | | |
| | 4 | 15 | 18 | 16 | 1 | 54 | 2.9 |
| mpact assessment does not follow published good practice guidance and | 0.00% | 5.45% | 25.45% | 60.00% | 9.09% | | |
| eaves some uncertainty around the results - which requires further more detailed information to be provided? | 0 | 3 | 14 | 33 | 5 | 55 | 3. |

Q18 What Common Issues with Ecological Reports Give You the Most Problems? (Please rank your answers using the boxes provided)



| | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | N/A | Total | Score |
|--|---------------------|---------------------|--------------------|--------------------|--------------------|---------------------|--------------------|--------------------|-------------------|-------------------|-------------------|-------------------|-------------------|-------|-------|
| Inadequate or missing ecological surveys | 29.09% 16 | 12.73% 7 | 5.45% 3 | 10.91% 6 | 9.09% 5 | 3.64% 2 | 9.09% 5 | 5.45% 3 | 3.64% 2 | 0.00% 0 | 5.45% 3 | 3.64% 2 | 1.82% 1 | 55 | 8.67 |
| No data searches | 3.85% | 11.54% 6 | 7.69% | 11.54% | 11.54% 6 | 1.92% | 7.69% | 13.46% | 7.69% | 13.46% | 5.77% | 1.92% | 1.92% | 52 | 6.71 |
| Poor initial scoping | 1.89% | 5.66% | 7.55% | 9.43% | 7.55% | 11.32% | 11.32% 6 | 13.21% 7 | 5.66% | 13.21% | 11.32% | 0.00% | 1.89% | 53 | 6.15 |
| Poor assessment of ecological impacts | 9.26% 5 | 9.26% 5 | 11.11% 6 | 9.26% 5 | 3.70% 2 | 18.52% 10 | 16.67% 9 | 7.41% 4 | 5.56% 3 | 7.41% 4 | 1.85% 1 | 0.00% 0 | 0.00% 0 | 54 | 7.52 |
| Inadequate proposals for necessary mitigation and compensation | 7.14% 4 | 17.86% 10 | 14.29% 8 | 12.50% 7 | 8.93% 5 | 10.71% 6 | 12.50% 7 | 5.36% 3 | 3.57% 2 | 3.57% 2 | 0.00% 0 | 3.57% 2 | 0.00% 0 | 56 | 8.14 |

| Little or no | 3.77% | 9.43% | 9.43% | 13.21% | 15.09% | 15.09% | 5.66% | 5.66% | 13.21% | 1.89% | 7.55% | 0.00% | 0.00% | | |
|--|--------------------|-------------------|--------------------|--------------------|--------------------|--------------------|--------------------|--------------------|---------------------|---------------------|--------------------|-------------------|-------------------|----|-----|
| recommendations for enhancements (net gain) | 2 | 5 | 5 | 7 | 8 | 8 | 3 | 3 | 7 | 1 | 4 | 0 | 0 | 53 | 7.1 |
| Poor structure and format of ecological reports - so the key facts are difficult to find/confirm | 11.11% 6 | 0.00% 0 | 9.26% 5 | 9.26% 5 | 11.11% 6 | 12.96% 7 | 14.81% 8 | 9.26% 5 | 7.41% 4 | 9.26% 5 | 3.70% 2 | 0.00% 0 | 1.85% 1 | 54 | 7.0 |
| Limitations on methods and work are not reportedly adequately | 0.00% 0 | 7.14% 4 | 7.14% 4 | 10.71% 6 | 12.50% 7 | 10.71% 6 | 1.79% 1 | 10.71% 6 | 17.86% 10 | 12.50% 7 | 7.14% 4 | 0.00% 0 | 1.79% 1 | 56 | 6.2 |
| PEAs are submitted when in fact an EcIA is required | 10.00% 5 | 6.00% 3 | 6.00% 3 | 2.00% 1 | 4.00% 2 | 2.00% 1 | 6.00% 3 | 10.00% 5 | 10.00% 5 | 20.00% 10 | 14.00% 7 | 4.00% 2 | 6.00% 3 | 50 | 5.6 |
| Just one or two ecological consultancies regularly submit poor work and take up a disproportionate amount of time | 16.67% 9 | 7.41% 4 | 12.96% 7 | 7.41% 4 | 7.41% 4 | 9.26% 5 | 11.11% 6 | 3.70% 2 | 3.70% 2 | 3.70% 2 | 7.41% 4 | 5.56% 3 | 3.70% 2 | 54 | 7.6 |
| Non compliance with published good practice guidance (e.g. for ecological surveys) | 3.64% 2 | 9.09% 5 | 9.09% 5 | 7.27% 4 | 10.91% 6 | 1.82% 1 | 5.45% 3 | 16.36% 9 | 12.73% 7 | 7.27% 4 | 16.36% 9 | 0.00% 0 | 0.00% 0 | 55 | 6. |
| Other ? | 3.13% | 3.13% | 0.00% | 0.00% | 0.00% | 3.13% | 0.00% | 3.13% | 0.00% | 3.13% | 6.25% | 37.50% | 40.63% | | |
| | 1 | 1 | 0 | 0 | 0 | 1 | 0 | 1 | 0 | 1 | 2 | 12 | 13 | 32 | 2. |