Statutory Biodiversity Net Gain Monitoring and Report Fees (Pages 2 – 17)

CABINET MEMBERS DELEGATED DECISION

Open/ Exempt		Mar	Mandatory/					
Any especially affected	Borough wide		Disc	Discretionary/				
Wards				Operational				
Lead Member: C	•		Othe	er Cabinet Membe	ers consulted: Cllr	J Moriarty		
E-mail: cllr.james	.moriarty@west-no	rfolk.gov.uk	Othe	Other Members consulted:				
Lead Officer: Cla	aire Wiggs		Othe	Other Officers consulted:				
E-mail: Claire.wig	ggs@west-norfol	k.gov.uk		Stuart Ashworth, Assistant Director Environment and				
			Planning					
		Lee	Lee Osler, Office Manager Environment and Planning					
Financial	Policy/Person nel	Statutory		Equality	Risk	Environmental		
Implications YES/ NO	Implications	Implication	IS	Impact Assessment	Management	Consideration		
TLO/ NO	YES/NO	I LS/ NO		YES/ NO	Implications YES/NO	S		
	120/10			If YES: Pre-	7-E0/NO	YES/NO		
				screening/ Full		120/10		
				Assessment				
If not for publication, the paragraph(s) of Schedule			edule	12A of the 1972 L	ocal Government	Act considered		
to justify that is (are) paragraph(s)								
Date of publication of report: 02 December 2025			25	Date decision to be taken: 09 December 2025				
Deadline for Call-In: 16 December 2025					-			

TITLE: STATUTORY BIODIVERSITY NET GAIN MONITORING AND REPORTING FEES

Summary

The purpose of this report is to introduce a charging schedule for monitoring S106 Agreement clauses for Biodiversity Net Gain (BNG) sites, for all sites where such a monitoring obligation exists. BNG sites are required to be monitored over a 30-year period. The monitoring fee is predominantly aimed at sites where larger areas of habitat will be created. Monitoring fees are already charged for other monitoring requirements.

Decision to be taken

- 1) A BNG monitoring fee is introduced as set out in para 2.2 (Option 2) and the associated fee schedule at Appendix 1.
- 2) Delegated authority is given to the Director and / or Assistant Director, Environment and Planning in consultation with the Portfolio Holder for Planning and Licensing to review the monitoring fees on an annual basis, taking into account inflation and pay awards and a more detailed review in light of data from the first few years will be undertaken.

Reason for Decision

To ensure appropriate fees are set and received so the Council can resource monitoring BNG sites as part of a S106 Agreement over a 30-year period without any additional financial burden to the Council.

1 Background

- 1.1 In England, BNG is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.
- 1.2 BNG is the mandatory requirement for certain developments needing planning permission to demonstrate a 10% biodiversity net gain. From January 2024, all major developments are required to secure 10% BNG. It was also mandatory from April 2024 for qualifying minor developments.
- 1.3 BNG must be achieved through creation or enhancement of habitats on the development site or, where a deficit remains, on sites elsewhere (known as off-site BNG). The habitat value is quantified in Biodiversity Units (BUs) using a statutory metric. All habitats created or enhanced off-site must be secured by a legal agreement for a minimum of 30 years and must be monitored for the same period. Any significant BNG habitat onsite must also be monitored for 30 years and secured by planning obligation.

Planning obligations are legal obligations entered into to mitigate the impacts of a proposed development. Planning obligations are normally secured through a legal agreement under Section 106 of the Town and Country Planning Act 1990 (as amended) and are a mechanism through which development proposals can be made acceptable in planning terms. The terms planning obligations and S.106 agreements therefore often refer to the same thing.

- 1.4 The Local Government Act 2003 (Section 93) provides the legislative basis for local authorities to charge for discretionary services such as the administration / monitoring of Section 106 Agreements. There was an amendment to the Community Infrastructure Levy (Amendment) (England) (No.2) Regulations 2019 and this clarified that monitoring contributions could be sought through a S106 agreement, and it is in this context it is considered appropriate to recover the cost of administration and monitoring Section 106 obligations.
- 1.5 The proper administration of a Section 106 monitoring regime is resource intensive, and it is considered appropriate to seek a system where monitoring is cost neutral to the council. A fee for monitoring S106 agreements and other requirements such as affordable housing is already in place. However, a separate monitoring fee for BNG is required as sites will need to be monitored at defined intervals over the 30-year term.

Any planning obligation for BNG must encompass the initial habitat creation works, the ongoing habitat management regime over those 30 years and the



site monitoring surveys and reporting to the body with whom the legal agreement is signed. Where that body is the council, the responsibility for monitoring will lie with the council (the Local Planning Authority (LPA)).

- 1.6 The LPA will need to review and sign-off ecological monitoring reports which the developer will provide at specified intervals. Ecology officer time and expertise will be required to review these monitoring reports, and potentially carry out site visits.
- 1.7 All off-site and significant on-site BNG will have to be secured by a legal agreement, specifying an agreed Habitat Management and Monitoring Plan. The developer or third parties (such as a Habitat Bank provider) acting on their behalf will provide the LPA with monitoring reports at specified intervals over the 30-year period.
- 1.8 Key monitoring points throughout the 30-year period, will be set out in the S106, for example in years 1, 3, 5, 10, 15, 20, 25 and 30 after the initial work to establish the habitats. This would be a total of eight monitoring years per site.
- 1.9 At some monitoring intervals an LPA ecologist may also need to conduct a site visit to verify the ecology report. They may need to discuss remedial management actions with the biodiversity gain site manager, for example if the habitats are not on track to meet standards committed to in the agreement.
- 1.10 These activities by the LPA carry a significant cost, given that the burden of ongoing agreements will grow over time as new developments, tied to 30-year commitments are granted planning permission.
- 1.11 The costs of staff time can be expected to grow year on year, so inflation effects should be considered. As an illustration, an assumed inflation rate of 3.5%, compounded yearly would make a cost approximately 2.8 times greater by year 30 compared to year one.
- 1.12 This report presents a proposed charging structure for the Borough Council of King's Lynn and West Norfolk (BCKL&WN) for a monitoring fees calculator based on habitat created. The intention is to make full recovery of costs associated with council officers monitoring the progress of BNG sites of a certain size.
- 1.13 The monitoring fees charging structure accords with the principle of making it cost neutral to the authority. The tables below details analysis for the period 01 June 2024 31 May 2025 (12 months). Potential monitoring income for this period would have been £95,758.89, had it been in place.
- 1.14 It is fair to say that BNG is a technically complex area, involving biodiversity units, and habitat creation of differing ecological benefit. For example, a wetland created would have a higher biodiversity value for BNG purposes, than say a grassland. The proposed scheme aims to balance these issues, and there is also a threshold for smaller scale schemes, where they will be excluded from providing a fee.

Table 1: Number of applications in each category (01 June 24 – 31 May 2025).

Monitoring Fee standard lookup table – Area Biodiversity Units						
	Technical difficulty of creating/enhancing habitat proposed					
Size of habitat creation/enhancement proposed (hectares)	Low Moderate High					
Below the Threshold (0 to 0.25)	44	2	0			
Very Small (0.25+ to 5	10	0	0			
Small (0.5+ to 1)	3	1	0			
Medium (1+ to 2)	2	0	0			
Large (2+ to 5)	0	0	0			
Very Large (5+)	0	2	0			

Table 2: Fee forecast for each category within the twelve month period assessed.

Monitoring Fee standard lookup table – Area Biodiversity Units						
	Technical difficulty of creating/enhancing habitat proposed					
Size of habitat creation/enhancement proposed (hectares)	Low	Moderate	High			
Below the Threshold (0 to 0.25)	£0,000	£0,000	£0,000			
Very Small (0.25+ to 5)	£24,050.70	£0,000	£0,000			
Small (0.5+ to 1)	£13,014.03	£5,950.24	£0,000			
Medium (1+ to 2)	£12,628.42	£0,000	£0,000			
Large (2+ to 5)	£0,000	£0,000	£0,000			
Very Large (5+)	£0,000	£40,115.50	£0,000			

1.15 The calculator is based on estimated officer time at each monitoring event, related to both size (total habitat area to be monitored, in hectares) and



complexity of the site (based on the highest technical difficulty category of the habitats included, using the Difficulty scores in the Statutory Metric).

- 1.16 A separate calculation will be required for linear habitats which are measured in meters. Where both linear habitats and area habitats are present, the area calculator will be used. The additional time required to monitoring the linear habitat will be costed as additional site visit time (approximately 30 mins extra costed at £60 per site visit) and included in the fee. Any application that is solely delivering Hedgerow Units will be calculated via the same process as for Area Units. Any applications that deliver Water Course Units will require a bespoke fee calculation due to the technical complexity of assessing this Unit type.
- 1.17 The BNG monitoring fees will be reviewed annually (for example to adjust for relevant inflation figures). A more detailed review in light of data from the first few years will be undertaken, when the first tranche of site monitoring reports have been processed, actual costs will be better understood, and the charges can be reviewed in light of this. At this stage the calculator tool itself (as well as the figures input in the calculator) may be revised to better reflect real costs.
- 1.18 For benchmarking, the charging structures for BNG monitoring in several other English LPAs have been reviewed. These case study examples are included in Appendix 2, namely Leeds City Council, Buckinghamshire County Council, New Forest District Council, Bracknell Forest Council, Calderdale Council and South Cambridgeshire District Council.
- 1.19 In summary, most of the case study LPA's charge a one-off fee payable up front to cover the costs over the 30 years and most include an index-linked element to account for inflation. Most also have charges tiered by size of the BNG site and some also by technical difficulty of creating or enhancing the habitats therein.
- 1.20 Of the benchmarked councils the lower end examples start their scale of charges at around £2000 £5000. The upper end ranges are more variable, some open ended for large complex sites. Leeds City Council have a simple two-tier scale, charging £2.5k or £5k with the threshold for the higher fee being sites yielding more than 10 Biodiversity Units. It is not clear how they have arrived at those figures.
- 1.21 Buckinghamshire developed the most comprehensive staff-time calculator spreadsheet: the smallest and simplest sites are charged £8,618.24 ranging to the largest and most complex sites charged at £50,315.53, for greater than 20ha. Buckinghamshire specified the most monitoring intervals (10) and used a much higher staff day rate of £700.
- 1.22 One benchmarked council, Bracknell Forest, charges pro-rata by hectares, e.g. a 25ha site (large in BNG terms) would be £90k (versus £50k in the Buckinghamshire calculator) for the 30-year monitoring costs.
- 1.23 The BCKL&WN calculator yields one-off fees ranging from £2,405.07 for a very small site (defined as habitat creation/enhancement of up to 0.5ha), low technical difficulty, though a mid-range of £9,405.72 (Medium site, habitat

creation/enhancement of up to 2ha, moderate difficulty) to a top end of £24,716.97 (Large site, with habitat creation/enhancement of up top 5ha, high difficulty). Larger sites and higher difficulty are reflected in increased time allowance for site visits and for reviewing the reports.

- 1.24 It should be noted that there is no charge for smaller sites where there is less than 0.25 ha of habitat creation, or less than 10m of hedgerow. It should also be noted that the fee calculator is based on habitat creation and not the size of the site associated with the development itself. In practice this means individual and small numbers of plots for housing for example, would not usually be covered by the monitoring fee.
- 1.25 For biodiversity gain sites creating and/or enhancing more than 5ha of habitat a bespoke fee will be agreed by the Director and / or the Assistant Director, Environment and Planning in consultation with the Portfolio Holder for Planning and Licensing. These will be the biggest sites. In special circumstances such as damage or loss to irreplaceable habitats, bespoke BNG compensation is required so these are also likely to need bespoke monitoring fees being agreed between developer and the LPA.
- 1.26 A single lump sum payment up-front was considered most appropriate, with a forward projection of inflationary increase. This offers the least amount of administrative burden for officers, including the Finance Service, and reduces costs for the customer. In addition, if you do not charge at the start of the process, it is highly likely that you will not be able to retrieve fees given that this covers such a long-time into the future.

2 Options Considered

2.1 Option 1 – no monitoring fee.

Monitor BNG sites with no monitoring fee. As BNG is a legal requirement, the Council would have to resource and carry the cost of fulfilling this function out of general funds, despite current legislation allowing the introduction of a monitoring fee, para 1.5. In addition, monitoring is required for 30 years, so the burden will grow and grow.

2.2 Option 2 – introduce a monitoring fee depending on size and complexity of the consented development.

Introduce a monitoring fee as set out in Appendix 1. This would ensure monitoring of BNG sites, over a 30-year period, would not be a financial burden to the Council. Subject to the number of consented planning applications requiring BNG this could generate an annual income as detailed in para 1.15 of this report and associated table 1 and 2. It is anticipated that standard wording or clauses will be needed for the S.106 agreements, to make it easier for applicants, and so these will need implementing ahead of the fee commencing early in 2026.



2.3 Option 3 – wait to see if a Norfolk wide monitoring fee schedule is agreed and implemented.

There are no timescales for this and no guarantee Norfolk authorities will agree to a standard monitoring fee. If this option was considered the most appropriate then the Council would not levy a BNG monitoring fee for qualifying developments and the Council would carry this financial burden until such time a Norfolk wide monitoring fee is agreed, if at all.

3 Policy Implications

- 3.1 There are no direct policy implications of the new fees calculator. New legal agreements to secure BNG are mandatory in the BNG legislation so whilst the authority will have an increased legal burden resulting from BNG, the levying of a fee for ecology officer time has no effect on that legal burden.
- 3.2 The general Biodiversity duty and support for the environment are set out in local and national policies, and this will help support those.

4 Financial Implications

4.1 Not imposing monitoring fees would be detrimental to the council's finances. Costs will rise significantly over 30 years and the total caseload of agreements to be monitored will increase significantly.

5 Personnel Implications

5.1 None at present. However, as more S106 agreements are in place to monitor BNG then there is likely to be a need in the future to increase resources to support the Ecology Officer and the Monitoring and Compliance Officer who currently monitors S106 agreements. This should be assessed at the review stage and reflected in any future BNG monitoring fees.

6 Environmental Implications

6.1 None.

7 Statutory Considerations

7.1 In England, the BNG process is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

8 Equality Impact Assessment (EIA)

8.1 The pre-screening report template has been completed and included at the end of this report.

9 Risk Management Implications

9.1 Failure to impose fees would put an additional financial burden on the Council and significantly compromise the council's ecology resource within a few years.

A lack of capacity in ecology would in turn compromise the processing time for planning applications and additionally prevent the council's ecologist providing expertise to wider areas of the council's operations, which are set to increase due to the extended Biodiversity Duty mandated in the Environment Act.

- 10 Declarations of Interest / Dispensations Granted
- 10.1 None.
- 11 **Background Papers**
- 11.1 Appendix 1 - table of proposed charges to be levied based on size of development and technical difficulty to monitor.
- 11.2 Appendix 2 - benchmarking of BNG monitoring fees in other local planning authorities.
- The biodiversity net gain regulations most directly relevant to planning are: 11.3
 - The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations 2024 which commence biodiversity net gain for most types of new planning applications and provides transitional arrangements for section 73 permissions.
 - The Biodiversity Gain Requirements (Exemptions) Regulations 2024 which prescribe exemptions for categories of development to which biodiversity net gain does not apply.
 - The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 which amend the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013 to include provisions in respect of applications for planning permission and the submission and determination of Biodiversity Gain Plans, as well as modifications of Schedule 7A of the Town and Country Planning Act 1990 for phased development.
 - The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 which set out the modifications for irreplaceable habitat.
 - In addition, there are regulations for the Biodiversity Gain Site register established under section 100 of the Environment Act 2021 for registered offsite biodiversity gains.

Signed:...

Cabinet Member for: Parma Licensin C. Date: 25/11/25



Appendix 1

Monitoring Fee standard lookup table – Area Biodiversity Units						
	Technical difficulty of creating/enhancing habitat proposed					
Size of habitat creation/enhancement proposed (hectares)	Low Moderate High					
Below the Threshold (0-0.25)	£0,000	£0,000	£0,000			
Very Small (0.25+- 0.5)	£2,405.07	£3,750.95	£4,171.52			
Small (0.5+ to 1)	£4,338.01	£5,950.24	£8,427.85			
Medium (1+ to 2)	£6,314.21	£9,405.72	£14,298.58			
Large (2+ to 5)	£11,245.32 £15,105.82 £24,716		£24,716.97			
Very Large (5+)	Bespoke Fee					

For BNG sites that create and/or enhance more than 5 hectares of habitat a bespoke fee will be agreed by the Director and / or Assistant Director, Environment and Planning in consultation with the Portfolio Holder for Development and Regeneration.

Monitoring Fee standard lookup table – Hedgerow Biodiversity Units						
	Technical difficulty of creating/enhancing habitat proposed					
Length of habitat creation/enhancement proposed (meters)	Low	Moderate	High			
Below the Threshold (0-10)	£0,000	£0,000	£0,000			



Very Small (10 to 25)	£1,005.18	£1,036.19	£2,214.52	
Small (25 to 50)	£1,036.19	£1,060.99	£2,297.47	
Medium (50 to 100)	£1,060.99	£1,092.00	£2,363.83	
Large (100 to 200)	£1,092.00	£1,846.31	£2,463.37	
Very Large (200+)	Bespoke Fee			

For BNG sites that create and/or enhance more than 200 meters of hedgerow a bespoke fee will be agreed by the Director and / or Assistant Director, Environment and Planning in consultation with the Portfolio Holder for Development and Regeneration

Standard BNG monitoring periods – years 1, 2, 3, 5, 10, 15, 20, 25 and 30.



Appendix 2

Benchmarking of BNG monitoring fees in other local planning authorities

Leeds City Council

- Charge a one off-fee for Biodiversity Monitoring and Reporting Body function
- Two-tier fee, scaled by number of biodiversity units (Bus) involved in the agreement
- £2,500 for up to 10 biodiversity units or £5,000 for over 10 BUs (where units purchased directly from a private Habitat Bank or on developers' own land)

COMMENTS:

- No indication of allowance for price inflation over 30 years.
- > Simple, easy to understand.
- > This applies only to non-council land.
- ➤ They suggest cost is in line with similar monitoring obligations of other S106 items such as Highways
- West Yorkshires Combined Authority also setting up a habitat banking vehicle (HBV) for selling Units on council land. The pricing of BUs will build in fees for 'habitat monitoring' (by a partner body) and for the 'BNG monitoring and reporting body function' (by the LPA).

Buckinghamshire County Council

- Charging a one-off fee for Biodiversity Monitoring
- Developed a Monitoring Fees Calculator an excel spreadsheet based on estimated staff time
- Uses an assumed officer day rate of £700
- Uses an assumed inflation rate of 3.5% per annum
- Uses an assumed corporate overheads multiplier of 1.4 (i.e. 40%)
- Fees Calculator based on several input variables and pre-determined values:
- Size of BNG offset site (small 0-10ha, medium 11-20ha, large >20ha)
- Technical Difficulty of BNG habitats involved (Low, Moderate, High use highest present on site)
- Number of monitoring events = 10, plus initial review of plan year zero
 - some years reviewing report only, some years report plus site visit (4, 5 or 7 occasions depending technical difficulty)
- Estimated time per report or site visit (range: small sites of low diff to large sites
 of high difficulty)
- Track record / experience level of site manager (a lower scale if they already manage more than 10 existing sites for nature)

COMMENTS:

- Rather involved; initially complicated to understand but generates the figures automatically.
- > The calculator would be consulted for each new agreement.
- Useful approach and the calculator could be adapted or simplified.

- > Fixed inflation projection could draw criticism.
- Could also be used for levying a fee at time of each monitoring event rather than a one-off up-front payment, index linked for actual inflation using CPI or RPI.

New Forest Council

- · Charging a one-off fee for Biodiversity Monitoring
- Based on 10 officer days (at £400) plus 2.5 general officer support days (at £250) for review of reports
- Based on five monitoring points at years 2, 5, 10, 20 and 30
- Flat fee of £4,625, developments up to 50 units (but units here meaning dwellings, I think)
- Developments over 50 units Minimum £4,625. Additional rate charged if physical inspection likely to take additional time.
- Subject to annual indexation uplift using the Retail Prices Index (RPI)

COMMENTS:

- > RPI indexation applied to agreements is revised annually, but as it is still a oneoff fee charged up-front this does not factor the ongoing cost (of officer time etc) increasing over the 30 years.
- On the other hand, a very straightforward approach to inflation and there will be an income stream from new agreements which rises year on year with RPI.
- > Their proposals, as of March 22, also set out different fees for the range of other \$106 agreements e.g. public open space, affordable housing.

Bracknell Forest Council

- Charging a one off-fee for administration monitoring of S106 agreements for BNG.
- Scaled by area; up to one hectare £3,600
- Over one hectare £3,660 ha pro rata

COMMENTS:

- > Based on estimate of hours 60hrs / 60+hrs spent in admin and monitoring.
- > No mention of indexation so does not factor costs increasing over 30 years.
- ➤ Pro rata the most expensive e.g. a 25ha site x £3,600 = £90,000 compared to Bucks £50k for 20-40ha, high complexity.

Calderdale Council

- One-off charges payable to cover facilitation, monitoring and strategic biodiversity delivery
- £2,000 per BU to cover the cost of monitoring over 30-year period
- £1,000 per BU strategic biodiversity delivery charge
- £2,000 per BU one-off facilitation charge for Council owned land-banks



COMMENTS:

- ➤ The above were arrived at based on a proposal to sell BUs on council land priced at £20k per BU.
- The monitoring cost and the facilitation charge each being 10% of £20,000, the strategic charge being 5% of £20,000.
- For Habitat Banks, only the strategic charge would be levied, £1,000.
- Monitoring fee plus Strategic charge applies to other cases.
- Facilitation charge applies to council land banks for baseline surveys, management plans etc.
- Strategic fee to contribute to biodiversity projects such as LWS surveys and management advice.
- Would query whether the strategic fee can be justified for BNG or whether a statutory duty of LPA.

South Cambridgeshire District Council

- District Council Ecologist Monitoring Fee payable at each monitoring event
- To cover the cost of monitoring the Habitat Site and reviewing the Management Plan and the Monitoring Report
- Paid in ten instalments years 1, 2, 3, 4, 5, 10, 15, 20, 25, 30
- Index Linked by way of CPI

COMMENTS:

> Appears to be the only one of these case studies levying a fee at each monitoring event.



Stage 1 - Pre-Screening Equality Impact Assessment

For equalities profile information please visit Norfolk Insight - Demographics and Statistics - Data Observatory

Name of policy/service/function	BNG Monitoring Fee						
Is this a new or existing policy/ service/function? (tick as appropriate)	New	1	Exist	ing			
Brief summary/description of the main aims of the policy/service/function being screened.	The purpose of this report is to introduce a charging schedule for monitoring S106 Agreements for Biodiversity Net Gain (BNG) sites for all sites where such an obligation exists. Sites are required to be monitored over a 30 year period.					1	
Please state if this policy/service is rigidly constrained by statutory obligations, and identify relevant legislation.					-		
Who has been consulted as part of the	Cllr J Moriarty						
development of the policy/service/function? – new only (identify stakeholders consulted with)	Stuart Ashwo	rth					
,	Claire Wiggs						
Question	Answer						
1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups, for example, because they				Positive	Negative	Neutral	Unsure
have particular needs, experiences, issues or priorities or in terms of ability to access the	Age					ж	
service?	Disability					ж	
	Sex	-				×	
Please tick the relevant box for each group.	Gender Re-as	ssignment				ж	
NB. Equality neutral means no negative	Marriage/civil	partnership				ж	
impact on any group.	Pregnancy &	maternity				x	
	Race					ж	
If potential adverse impacts are identified, then a full Equality Impact Assessment	Religion or be	elief				ж	
(Stage 2) will be required.	Sexual orienta	ation				х	
	Armed forces	community				ж	
	Care leavers					ж	
	Health inequa	alities*				×	
*For more information on health inequalities please visit <u>The King's Fund</u>	Other (eg low responsibilitie	income, caring s)	3			ж	

Please provide a brief explanation of the answers above:

The introduction of a charging schedule for monitoring S106 Agreements for Biodiversity Net Gain (BNG) sites for all sites where such an obligation exists. BNG sites are required to be monitored

over a 30-year period. BNG associated with new developments will have a positive impact on the environment and the community as a whole. Question Answer Comments 2. Is the proposed policy/service likely to Yes / No affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another? 3. Could this policy/service be perceived as Yes / No impacting on communities differently? If 'yes' to questions 2 - 3 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary: Decision agreed by EWG member: 4. Are any impacts identified above minor and Yes / No Actions: if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section Actions agreed by EWG member: 5. Is the policy/service specifically designed Yes / No Please provide brief summary: to tackle evidence of disadvantage or potential discrimination? Assessment completed by: Name Lee Osler Job title Office Manager



Date completed	31st October 2025			
Reviewed by EWG member		Date		

✓ Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy (corporate.policy@west-norfolk.gov.uk)