



PGAT Governance Report – 250545

1. Nature of This Representation (Procedural & Governance)

This representation outlines the findings from the planning governance assessment tool regarding the application referenced as 250545. It details unacceptable deferral events, critical policy expectation failures, and issues related to evidence accessibility and completeness.

2. Headline Procedural Position

The assessment has identified multiple unacceptable deferral events and critical policy expectation failures, which raise concerns regarding governance and decision-making processes.

3. Unacceptable Outline-Stage Deferrals (Decision-Critical)

1. Ecology & Biodiversity Net Gain (BNG/HRA) Deferral type: `indicative_only` Rationale: `ecology_bng` is core-required at outline stage; fundamentals appear deferred (`indicative_only`).

Source file: `BIODIVERSITY_GAIN_PLAN_REV_B.txt`

Excerpt: will require separate consideration which must comply with existing national and local policy and legislation. data relating to these can be entered into the metric, so as to give an indicative picture of the biodiversity value of the habitats present on a site, but this should be supported by bespoke advice. condition 2.12 a condition assessment was conducted by ses

Procedural principle engaged:

- Distinguishes between background reports and decision-stage evidence.
- Evidence vs decision evidence —
https://pgat.co.uk/evidence_verses_decision_evidence.php#section1

2. Ecology & Biodiversity Net Gain (BNG/HRA) Deferral type: `indicative_only` Rationale: `ecology_bng` is core-required at outline stage; fundamentals appear deferred (`indicative_only`).

Source file: `BIODIVERSITY_GAIN_PLAN_REV_B__2.txt`

Excerpt: will require separate consideration which must comply with existing national and local policy and legislation. data relating to these can be entered into the metric, so as to give an indicative picture of the biodiversity value of the habitats present on a site, but this should be supported by bespoke advice. condition 2.12 a condition assessment was conducted by ses

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3. Ecology & Biodiversity Net Gain (BNG/HRA) Deferral type: indicative_only Rationale: ecology_bng is core-required at outline stage; fundamentals appear deferred (indicative_only).

Source file: BIODIVERSITY_GAIN_PLAN_REV_C.txt

Excerpt: will require separate consideration which must comply with existing national and local policy and legislation. data relating to these can be entered into the metric, so as to give an indicative picture of the biodiversity value of the habitats present on a site, but this should be supported by bespoke advice. condition 2.12 a condition assessment was conducted by ses

Procedural principle engaged:

- Distinguishes between background reports and decision-stage evidence.
- Evidence vs decision evidence —
https://pgat.co.uk/evidence_verses_decision_evidence.php#section1

4. Ecology & Biodiversity Net Gain (BNG/HRA) Deferral type: indicative_only Rationale: ecology_bng is core-required at outline stage; fundamentals appear deferred (indicative_only).

Source file: BIODIVERSITY_GAIN_PLAN_REV_C__2.txt

Excerpt: will require separate consideration which must comply with existing national and local policy and legislation. data relating to these can be entered into the metric, so as to give an indicative picture of the biodiversity value of the habitats present on a site, but this should be supported by bespoke advice. condition 2.12 a condition assessment was conducted by ses

Procedural principle engaged:

- Distinguishes between background reports and decision-stage evidence.
- Evidence vs decision evidence —
https://pgat.co.uk/evidence_verses_decision_evidence.php#section1

5. Highways & Transport Deferral type: by_condition Rationale: highways is core-required at outline stage; fundamentals appear deferred (by_condition).

Source file: PLANNING_STATEMENT_25.02.25.txt

Excerpt: roposals. a range mitigation measures have been recommended. these measures can be incorporated into the proposals at the detailed design stage of the planning process; and be conditioned as part of any outline planning approval. 6.37. the assessment concludes that, p19-0982 | gs | february 2025

Procedural principle engaged:

- Explains Local Plan infrastructure capacity as a statutory decision gate (paras 6.167–6.168).
- Local Plan infrastructure capacity as a decision gate —
https://pgat.co.uk/the_local_plan.php#section1

6. Highways & Transport Deferral type: by_condition Rationale: highways is core-required at outline stage; fundamentals appear deferred (by_condition).

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4. Critical Policy Expectation Failures

General / Cross-cutting — CRITICAL (systemic_governance_exposure) Reason: Multiple decision-critical procedural failures identified across core topics, increasing governance and decision exposure. Procedural principle engaged:

- Governance risk and decision exposure — https://pgat.co.uk/governance_risk_and_decision_exposure.php#section1

5. Evidence Accessibility & Completeness Issues

Drainage & Flood Risk — HIGH (critical_pipeline_failure) Reason: topic evidence appears stubbed/empty in extracted text set Procedural principle engaged:

- Explains Local Plan infrastructure capacity as a statutory decision gate (paras 6.167–6.168).
- Local Plan infrastructure capacity as a decision gate — https://pgat.co.uk/the_local_plan.php#section1

Highways & Transport — HIGH (critical_pipeline_failure) Reason: topic evidence appears stubbed/empty in extracted text set; unacceptable outline-stage deferral detected for this topic Procedural principle engaged:

- Explains Local Plan infrastructure capacity as a statutory decision gate (paras 6.167–6.168).
- Local Plan infrastructure capacity as a decision gate — https://pgat.co.uk/the_local_plan.php#section1

6. Why These Issues Cannot Be Cured by Conditions

The identified unacceptable deferral events and critical policy expectation failures indicate systemic issues that cannot be resolved through the imposition of conditions alone. The procedural integrity of the decision-making process is compromised.

7. Procedural and Governance Implications

The findings highlight significant procedural and governance implications that necessitate careful consideration in the decision-making process. The presence of unacceptable deferrals and critical failures raises concerns regarding compliance with statutory requirements and the overall



robustness of the planning process.

8. Closing Context

This representation serves to inform the local authority of the identified issues within the planning governance assessment, emphasizing the need for thorough evaluation and adherence to procedural standards in the decision-making process.