

Biodiversity gain plans: register of non-compliance

Defects identified in submitted and approved biodiversity gain plans and statutory metric calculations, ordered by local planning authority

Background to Biodiversity Gain Plans

Subject to certain exceptions, [Schedule 7A to the Town and Country Planning Act 1990](#), makes provision for grants of planning permission in England to be subject to a condition to secure that the biodiversity gain objective is met - at least a 10% biodiversity net gain. Paragraph 13 requires that every such planning permission shall be deemed to have been granted subject to the approval of a Biodiversity Gain Plan (BGP) submitted by the applicant.

[Article 37C \(2\) and \(4\) of the Town and Country Planning \(Development Management Procedure\) \(England\) Order 2015](#) sets out what a BGP must contain in addition to the matters required by paragraph 14(2) of Schedule 7A. This includes, in addition to the [published Defra biodiversity gain plan template](#), a completed [biodiversity metric calculation tool](#). Article 37C(4) applies where development is not to proceed in phases; for phased development the equivalent requirements are at article 37C(5).

Purpose and basis of this analysis

This register records every BGP (plan) in the Bristol Tree Forum dataset whose own contents disclose a defect. It is compiled mechanically from the BGP Data tab of [BGP Full Data Extract v10.xlsx](#), which holds the transcribed fields of each plan as submitted, together with the figures read from the accompanying statutory metric calculation where one was published.

We have also kept an audit of the spreadsheet analysis which can be examined here - [BGP dataset audit statement](#).

Every entry is drawn from what the plan itself states. Where a plan's figures are contradicted by its own metric, the metric figure is given so the discrepancy can be checked at source. Nothing here rests on inference about what an applicant intended.

Coverage: 116 of the 263 plans held – 44% – across 28 authorities, disclosing 159 separate defects. A further case initially flagged is shown as resolved, the apparent failure being an artefact of rounding on the form. The 258 plans are themselves a sample: see *Coverage and its limits* below.

Coverage and its limits

This register is a sample, and not a random one. Six filters listed below sit between it and the population of approved biodiversity gain plans in England, and each of them removes cases that are at least as likely to be defective as those that remain.

1. **The authorities are self-selecting.** The 29 local planning authorities covered were interrogated because their planning portals expose biodiversity gain plan applications in a form that can be searched and the documents downloaded. Authorities whose portals do not, or which do not publish the documents at all, are absent – not because they perform better, but because their decisions cannot be examined.
2. **The search of each portal may not have found every application.** Planning portals differ in how biodiversity gain plan applications are catalogued, and there is no single application type or search term that reliably returns all of them. Some authorities use a dedicated BGP or CONBGP reference, others record the plan against a condition-discharge application, and others attach it to the original permission with no distinguishing reference at all. The

searches used here were as thorough as each portal allowed, but no claim is made that they were exhaustive or found every qualifying application. Applications that the search did not surface are simply absent, and there is no way to know how many there are.

3. **Only decided applications are included.** Every plan in this register comes from an application that has been determined. Pending applications have been left out, because a plan still under consideration may yet be amended or refused, and criticising it would be premature. The consequence is that the register describes what authorities have already approved, not what they are currently being asked to approve, and it cannot show whether the position is improving or deteriorating.
4. **Only published documents can be tested.** Every entry below required a biodiversity gain plan to have been published. Approved BGP applications where no plan was published at all do not appear, however deficient the underlying scheme. Several such cases have been identified in passing – applications approved with no plan on the portal, approved plans that could not be used because they contained no useable biodiversity gain plan information, plans served under the wrong application reference, and a metric published with no accompanying plan. One example is Cheltenham 24/01602/DISCON, Land South of A46 Shurdington Road: the published metric records the on-site baseline falling from 111.995 units to 58.179, reports that the trading rules are not satisfied and carries a validation error, but no gain plan is published against it. These are, by definition, the cases where the authority has the least to show for its decision.
5. **Fewer than half the plans could be checked against a metric.** Of the 258 plans held, only 133 (52%) have a statutory metric calculation published alongside them. The remaining 125 can be tested only for what the BGP form discloses on its face – internal contradiction, missing fields, and inconsistency with the gain sites register. They cannot be tested for whether the figures on the form match the calculation they are supposed to come from, which is how several of the defects listed here were found. Article 37C (2) and (4) require the completed metric to form part of the plan, so a plan published without one is itself a departure from the procedure.
6. **A blank in the dataset is not proof of a blank on the form.** Every plan is transcribed from a PDF, and some of those PDFs are scans or use form layouts the extraction process handles poorly. Before this edition, 35 fields in section 1 were recorded as unanswered; re-reading all 27 plans against the source documents showed that 16 of those fields were fully completed on the form and the blank was a failure of capture. Those entries have been withdrawn. A further eight could not be checked, either because the source is no longer held or because the plan is handwritten and does not read reliably. They are also excluded. Only the 12 fields confirmed blank against the source are listed. The same audit was then run over sections 6 and 7 of the plan – the figures every net-gain percentage is calculated from – comparing 2,165 fields against the source documents. Sixteen did not match and were corrected before this edition; four of those corrections moved a plan below 10%. Reading the whole of every file in the folder rather than matching on file name also turned up seven decided plans the dataset had never recorded, all now included. Finally the 46 plans that exist only as scans, and so have no text to extract, were re-read using optical character recognition: 14 fields where the form shows an explicit zero and the dataset held a blank were corrected, and two plans whose figures cannot be read reliably at all – one of them handwritten – are marked as such and excluded from the percentages rather than guessed at. The same audit has since been run over the figures at 6.3 and 6.4, which is what the net gain percentages are calculated from: 782 fields were compared against the source documents and 779 matched; the three that did not were corrected before this edition. Two of those three corrections

moved a plan below 10%, and both now appear as class A entries in the appendix below. That audit reaches the 167 plans supplied as searchable text; 44 are scans with no text layer and 40 have no source document held, and for those 84 the figures rest on the original transcription alone. Section 4 has since been audited the same way, and it is where this mattered most. Question 4.6 – how the net gain will be achieved – is a tick box, and so are 4.1, 4.5, 4.7, 4.12, 4.13 and 5.2. None of these plans stores its ticks as form data: the tick is drawn on the page, and every text extractor reports a ticked box and an empty one identically, so a plan that answered the question looked exactly like a plan that ignored it. Each of the three boxes at 4.6 was therefore re-read on the 244 plans that carry the question by measuring the ink inside the box, looked at on the page wherever the reading disagreed with the dataset, and checked again against the tick character in the 141 plans whose text layer exposes it; the two methods agree throughout. Twenty-six recorded values were wrong. Thirty-one entries in this register rested on that failure and have been withdrawn – twenty at 4.6 where the form does tick an option, eight against documents that are not on the Defra template and so have no question 4.6 or 4.13 to leave blank, and three asserting that tick boxes were left unanswered throughout the form when every box named was in fact ticked. One entry at 4.6 stands: 22/03781/CONDC leaves all three boxes empty. The findings at 4.7 and 5.2 were tested the same way and stand.

The effect of all six filters runs the same way. The counts in this register should be read as a floor on the rate of defects among approved biodiversity gain plans, not an estimate of it. It is a floor, not a ceiling. A defect rate of 44% among plans that were found, decided, and published in full says nothing reassuring about those that we have been unable to analyse.

How the defects are classified

A – Statutory breach. The plan which, on its own figures, fails to deliver the 10% biodiversity gain required by paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990, or where the statutory metric calculation required by article 37C (2) and (4) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 is missing.

B – Defective form. The plan is internally inconsistent or incomplete: its stated net change contradicts its own pre- and post-development values, or a mandatory field is unanswered. The gain may still have been delivered, but the form as submitted does not demonstrate it. Every field in section 1 is mandatory, and a plan bearing no date is of particular consequence: the relevant date fixes the pre-development biodiversity value under paragraph 10 of Schedule 7A, so an undated plan cannot be checked against the baseline it claims. Section 1 entries are listed only where the field has been confirmed blank.

Section 3 is deliberately excluded. The responsible person details at section 3 are required only "if different to the applicant", so a blank section is frequently correct rather than defective, and the contact fields are in any event commonly redacted by the authority before publication. Blank section 3 entries are therefore not counted anywhere in this register, notwithstanding that they are absent from roughly a quarter of the plans held.

C – Register discrepancy. The off-site position recorded in the plan cannot be reconciled with the allocation shown on the Biodiversity Gain Sites Register for the same development. Differences that are explained by the spatial risk multiplier are NOT listed: the register records the allocation after the multiplier is applied, while the plan records the raw uplift, so a register figure at 1.00, 0.75 or 0.50 of the plan figure is consistent and has been excluded. Of 58 plans where the two sources differ, 49 were excluded on that basis and 9 remain, alongside the cases where one source records an off-site gain and the other records none at all.

Summary

Defect	Cases	Class
4.13 states no statutory metric was used	2	A – Statutory breach
Metric or plan not published	6	A – Statutory breach
Recorded net gain below 10%	33	A – Statutory breach
1.1 date of the plan not stated	11	B – Defective form
1.1 date precedes the survey and both signatures	1	B – Defective form
1.2 planning application reference not stated	3	B – Defective form
4.6 net-gain approach not stated	1	B – Defective form
4.7 neither box ticked	1	B – Defective form
6.1 survey date given as a month only	2	B – Defective form
6.1 survey date not stated	3	B – Defective form
6.3 and 6.4 rounded so the stated percentage cannot be derived	1	B – Defective form
6.4 records net change, not post-development value	2	B – Defective form
6.5 net change contradicts 6.3/6.4	18	B – Defective form
7.2 no gain site register reference	3	B – Defective form
7.4 and 7.5 record the combined totals, not the off-site values	1	B – Defective form
7.4 not stated while 7.5 is	1	B – Defective form
7.6 records the combined net change, not the off-site net change	4	B – Defective form
No document reference	1	B – Defective form
Section 6 not completed	2	B – Defective form

Defect	Cases	Class
Section 6 pre-development value not completed	1	B – Defective form
6.4 records the pre-development value, not the post-development value	1	B – Defective form
Metric published but no biodiversity gain plan	4	A – Statutory breach
Section 2 developer details not completed	1	B – Defective form
Section 7 not completed	1	B – Defective form
8.1 neither box ticked	1	B – Defective form
Section 6 post-development value not completed	1	B – Defective form
Section 7 records the whole gain site, not the allocation	2	B – Defective form
Section 7 repeats the section 6 figures	3	B – Defective form
Figures differ by a factor the spatial risk multiplier does not explain	10	C – Register discrepancy
Off-site uplift recorded but no allocation on the register	27	C – Register discrepancy
Register allocates units but the plan records no off-site gain	11	C – Register discrepancy
Total defects	159	

A plan may disclose more than one defect and is listed once under each. Phased developments are treated separately in section D below and are not counted in the table above.

D – Phased developments (watching brief)

This section is provisional. It rests on two developments and is recorded here so the evidence accumulates in one place as our investigations proceed; it does not yet support a general finding.

A phased development follows a separate route. Under the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 the developer submits an overall biodiversity gain plan for the whole scheme, and then a phase biodiversity gain plan for each phase before that phase may begin. The overall plan is the only document that states the gain for the development as a whole; each phase plan need only record that phase's contribution towards it.

Three of the 258 plans held are on this route, covering two developments. In both, the overall plan fails as a statement of the gain – in one case because its figures contradict each other, in the other because it contains no figures at all. Both were approved.

Development	Phases	Defect in the overall plan
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Delivery profiles

The two schemes phase their gain in opposite ways, which is itself the point: the regime permits either approach without further scrutiny.

Borough Triangle – contribution of each phase, from the phase 1 plan (section 8.3)

Phase	1	2	3	4	5	6	7	8	9
Units	0.00	-0.08	0.00	+0.32	+0.11	+0.02	+0.08	+0.52	0.00

Phases 1 to 3 deliver nothing and phase 2 is negative. 54% of the whole gain falls in phase 8 of 9. Phase 1 – the only phase so far approved to begin – has a zero baseline on 0.042 ha and delivers 0.00 units.

At ST 55669 70371 the profile is reversed: phase 1 delivers 145.52 area units, 86.11% of the total proposed, together with 96% of the hedgerow units and 95.5% of the watercourse units. Phase 2 adds 6.24 area units, about 3.73%.

What this does and does not show

On two developments no claim can be made about how phased schemes behave in general, and the contrast above shows the profiles differ sharply. The finding that is common to both, and that does not depend on the delivery profile, is that the overall plan – the only document stating the gain for the whole development – was in neither case a figure the authority could verify. One contradicted itself; the other was blank.

Both were approved, and in the Southwark case the first phase has been authorised to start on the strength of it.

Further phased developments will be added here as they are found, with the overall plan tested for a stated pre-development value, a stated post-development value, and a net change that reconciles both with those values and with the sum of the phase contributions.

Findings by local planning authority

The table below counts, for each authority, the plans held in the dataset, how many of them disclose at least one defect, and the defects by class. It is a measure of what each authority has approved, not of how carefully it assessed what it approved: a plan may be defective on its face for reasons the authority could not have detected without the metric, and the share of plans that can be checked against a metric varies widely between authorities.

The ordering is by the share of plans disclosing a defect. Authorities holding only one or two plans sit at the extremes for that reason alone and nothing should be read into their position.

Local planning authority	Plans held	With a defect	Share	A	B	C	Defects
London Borough of Tower Hamlets	3	3	100%	2	7	0	9
London Borough of Lewisham	1	1	100%	4	1	0	5
Worthing Borough Council	1	1	100%	1	1	0	2
South Cambridgeshire District Council	11	10	91%	2	2	8	12
Cheltenham Borough Council	10	9	90%	4	9	1	14
Cambridge City Council	4	3	75%	1	2	1	4
London Borough of Bexley	3	2	67%	1	0	1	2
Plymouth City Council	8	5	62%	1	2	3	6
Bristol City Council	18	11	61%	6	6	5	17
Leeds City Council	12	7	58%	3	2	3	8
North Somerset Council	12	7	58%	0	7	3	10
Royal Borough of Greenwich	8	4	50%	0	1	3	4
Forest of Dean District Council	6	3	50%	2	0	2	4
London Borough of Camden	6	3	50%	1	3	1	5
Brighton and Hove City Council	4	2	50%	1	0	1	2
Bolton Council	9	4	44%	2	1	1	4
London Borough of Barnet	7	3	43%	0	2	1	3
London Borough of Southwark	7	3	43%	0	3	0	3
BaNES	19	8	42%	3	4	3	10
Trafford Council	15	6	40%	2	2	3	7
South Gloucestershire Council	13	5	38%	2	4	1	7
Cotswold District Council	10	3	30%	1	1	3	5

Local planning authority	Plans held	With a defect	Share	A	B	C	Defects
East Suffolk Council	19	5	26%	3	2	2	7
Northumberland County Council	8	2	25%	2	1	0	3
North Devon Council	13	2	15%	1	0	1	2
Shropshire Council	7	1	14%	0	1	0	1
Cheshire West and Chester Council	15	2	13%	0	1	1	2
City of York Council	9	1	11%	0	1	0	1
Wyre Forest District Council	3	0	0%	0	0	0	0
County Durham Council	1	0	0%	0	0	0	0
Mansfield District Council	1	0	0%	0	0	0	0
All authorities	263	116	44%	45	66	48	159

Two authorities show no defects at all. Both hold very few plans — three and one — and the finding is that nothing was disclosed in those plans, not that the authorities perform better.

Acknowledgement

This register was drafted with Claude, an AI assistant made by Anthropic, working from the biodiversity gain plans and statutory metric calculations collected by The Bristol Tree Forum. The assistant transcribed the plans into the dataset, compiled the defects mechanically from the transcribed fields, ran the audit described above and drafted this text. The Bristol Tree Forum settled the scope, the classification of defects and the wording of the findings, and is responsible for the document.

That division of labour is worth stating plainly, because it bears on how the register should be read. Machine transcription fails silently and at scale: the audit found 32 errors in 2,165 numeric fields and a further 26 in the tick boxes at 4.6, and the largest single group of them were fields the extraction had missed which the register had then recorded as blanks on the form — findings against authorities that were not real. Those entries were withdrawn. The audit statement published alongside this register sets out what was checked, what was found and what remains unverified.

Every finding in this register is drawn from the plan or the metric itself, and each is stated with the figures it rests on so it can be checked at source. **Where a reader believes an entry is wrong, the underlying document is the test, not this register.**

Annex A — Findings by authority, in detail

Every defect counted in this register, set out authority by authority and grouped by class. Each entry gives the document reference, the planning application reference, the site, the defect and the figures it rests on.

BaNES

8 plans, 11 defects

A — Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
23/01981/FUL	23/01981/FUL	Greystones, South Road, Timsbury, Bath, BA2 0EJ	Recorded net gain below 10%	area +1.2%
23/02251/FUL	23/02251/FUL	48 Hillcrest, Pensford, Bristol, Bath and North East Somerset, BS39 4A	4.13 states no statutory metric was used	Articles 37C(2) and (4) require the completed metric
23/02251/FUL	23/02251/FUL	48 Hillcrest, Pensford, Bristol, Bath and North East Somerset, BS39 4A	Recorded net gain below 10%	area +0.0%

B — Defective form

Document ref.	Planning ref.	Site	Defect	Detail
25/02459/CON D	23/01861/FUL & 24/03600/NM A	Minerva Bath Rowing Club, Newbridge Road, Newbridge, Bath BA1 3NB	7.4 not stated while 7.5 is	7.5 records 0.07 area units with 7.4 left blank, so the baseline the off-site gain is measured from does not appear on the form.
24/03168/REG 03	24/03168/REG 03	Locksbrook Recycling Centre,	Section 7 repeats the section 6	7.4 gives 0.29 area and 0.57 watercourse units, the same as 6.3, so no off-site allocation distinct from the on-site position is stated.

Document ref.	Planning ref.	Site	Defect	Detail
		Locksbrook Road, Bath, BA1 3BH	figures	
(no reference)	25/03971/FUL	12 Coombend , Radstock, BaNES, BA3 3AJ	6.3 and 6.4 rounded so the stated percentage cannot be derived	Both are given as 0.03 and 6.5 as "<0.01" with a stated change of +18.8%. 6.1 gives the survey month only.
(no reference)	25/03971/FUL	12 Coombend , Radstock, BaNES, BA3 3AJ	No document reference	Published as "Document-0E0C56FCC161CA6517F8530C974A48D2.pdf" with no application reference in the title, and none appears on the form. The plan cannot be cited or retrieved by reference.

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
25/03288/REG03	25/03288/REG03	Mulberry Way, Combe Down, Bath, BA2 5BU	Figures differ by a factor the spatial risk multiplier does not explain	plan +0.10, register 0.01 (ratio 0.10)
PP-12702301	PP-12702301	133 The Oval, Bath, BA2 2HF	Off-site uplift recorded but no allocation on the register	plan records +0.05 units
25/02828/COND	24/02417/RES	Parcel 5159 Minsmere Road, Keynsham, Bath and North East Somerset	Off-site uplift recorded but no allocation on the register	plan records +5.07 units

4 plans, 4 defects

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
21481/25	20462/25	Crompton Way, Bolton, Greater Manchester, BL1 8TS	Recorded net gain below 10%	watercourse +0.0%
00439/26	20428/25	Land to the Rear of the Jubilee Centre, Crompton Way, Bolton, BL2 3AF	Recorded net gain below 10%	4.6 states the gain will be achieved both on site and off site and 4.9 puts the off-site requirement at 0.58 units, but section 7 is answered "N/a" throughout. On the figures given, on-site units fall from 3.25 to 2.99, a change of -7.87%.

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
00291/26	20734/25	Land South of Salford Rd, Bolton, BL5 1DQ	6.5 net change contradicts 6.3/6.4	6.3 = 7.51, 6.4 = 3.22 imply -4.2900; form states -4.3

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
20341/25	19610/25	Ladybridge High School, Bolton, BL1 4NG	Off-site uplift recorded but no allocation on the register	plan records +0.61 units

Brighton and Hove City Council

2 plans, 2 defects

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
BH2025/02377	BH2025/00716	29 Green Ridge, Brighton, East Sussex BN1 5LT	Recorded net gain below 10%	area +9.6%

C — Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
BH2025/00656	BH2024/02568	Land at 38 Lower Market Street, Hove, BN3 1AT	Register allocates units but the plan records no off-site gain	register allocates 0.02 units

Bristol City Council

11 plans, 20 defects

A — Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
25/11710/COND	21/01331/F	Caravan Club, Cumberland Road, Bristol, BS1 6XG	Recorded net gain below 10%	area -37.7%
25/10322/COND	24/00954/F	Bristol Sewage Treatment Plant, Kings Weston Lane,, Avonmouth, Bristol	Recorded net gain below 10%	watercourse +0.0%
26/12106/COND	24/01436/FB	The White Hall, Glencoyne Square, Bristol, BS10 6EU	Recorded net gain below 10%	area +9.7%
24/05112/COND	24/02421/FB	Filwood Community Centre, Barnstaple Rd, Knowle, Bristol,	Recorded net gain below 10%	area -4.1%

Document ref.	Planning ref.	Site	Defect	Detail
		BS4 1JP		
26/12626/BNG	25/12415/F	The Granary, Stockwood Road, Brislington, Bristol, BS4 5LU	Recorded net gain below 10%	area +9.6%
26/11682/COND		Holy Cross Church, Dean Lane, Bristol, BS3 1DB	Recorded net gain below 10%	4.6 states both on site and off site and 7.1 says units will be purchased, but 7.2 gives no register reference, 7.4 records 0 and 7.5 is not completed. On the figures given, on- site units fall from 0.44 to 0.29, a change of -33.10%.

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
25/11339/COND	24/01894/FB	The application site is within the former diesel depot on, Bath Road (	6.5 net change contradicts 6.3/6.4	6.3 = 1.83, 6.4 = 0.15 imply -1.6800; form states -1.67
25/13497/COND	24/02361/F	Unit 19, Bakers Park, Cater Road, Bristol, BS13 7TT	1.1 date of the plan not stated	Re-read against the source document; the field is blank on the form.
26/12197/BNG	25/13297/F	210-212 Broomhill Road, Brislington, Bristol, BS4 4TU	Section 7 repeats the section 6 figures	7.4 gives 3.61 area units, the same as 6.3. The 7.6 area box contains a list of habitats and areas rather than a number of units.

Document ref.	Planning ref.	Site	Defect	Detail
26/11682/COND		Holy Cross Church, Dean Lane, Bristol, BS3 1DB	1.2 planning application reference not stated	Re-read against the source document; the field is blank on the form.
26/12574/BNG	24/04919/F	19 Trevenna Road, Bristol, BS3 2QX	6.4 records net change, not post-development value	6.4 reads -1.48 area units and -0.27 hedgerow units. A post-development biodiversity value cannot be negative. 7.4 repeats the section 6 baseline and 7.6 repeats the on-site net change.
26/12574/BNG	24/04919/F	19 Trevenna Road, Bristol, BS3 2QX	7.2 no gain site register reference	The plan states 1.63 habitat units and 0.30 hedgerow units will be purchased and secured by a section 106 obligation, but records no gain site.

C — Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
25/11710/COND	21/01331/F	Caravan Club, Cumberland Road, Bristol, BS1 6XG	Register allocates units but the plan records no off-site gain	register allocates 0.50 units
24/05112/COND	24/02421/FB	Filwood Community Centre, Barnstaple Rd, Knowle, Bristol,	Register allocates units but the plan records no off-site gain	register allocates 0.34 units

Document ref.	Planning ref.	Site	Defect	Detail
		BS4 1JP		
25/11339/COND	24/01894/FB	The application site is within the former diesel depot on, Bath Road (	Figures differ by a factor the spatial risk multiplier does not explain	plan +3.45, register 1.87 (ratio 0.54)
25/13497/COND	24/02361/F	Unit 19, Bakers Park, Cater Road, Bristol, BS13 7TT	Figures differ by a factor the spatial risk multiplier does not explain	plan +0.61, register 0.56 (ratio 0.92)
26/11470/COND	25/14919/F	St Brendans RFC, Portway, Bristol, BS9 2HS	Register allocates units but the plan records no off-site gain	register allocates 0.04 units

Cambridge City Council

3 plans, 5 defects

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
25/00102/CONDA	25/00102/FUL	310 Histon Road, Cambridge, CB4 3HS	4.13 states no statutory metric was used	Articles 37C(2) and (4) require the completed metric

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
22/03781/CONDC	22/03781/FUL	127 Kings Hedges Road, Cambridge, CB4 2PL	4.6 net-gain approach not stated	Mandatory field left blank
24/04868/CONDA	24/04868/CONDA	Neurosciences Critical Care Unit (NCCU), Cambridge Biomedical	1.1 date of the plan not stated	Re-read against the source document; the field is blank on the form.

Document ref.	Planning ref.	Site	Defect	Detail
		Campus,		

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
22/03781/CONDC	22/03781/FUL	127 Kings Hedges Road, Cambridge, CB4 2PL	Off-site uplift recorded but no allocation on the register	plan records +0.01 units

Cheltenham Borough Council

9 plans, 16 defects

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
26/00941/DIS BNG	24/00399/FUL	The Folley, Swindon Road, Cheltenham	Metric or plan not published	The plan names its calculation at 4.14 as "Statutory_Biodiversity_Metric_Calculation_Tool__The Folley BNG Gain Plan December 25.xlsm". No such file is returned by any search of the portal. The development is 122 dwellings.
25/01850/DIS CON	24/01435/FUL	East Gloucestershire Club, Old Bath Road, Cheltenham, GL53 7DF	Metric or plan not published	The plan names its calculation at 4.14 as "B-CHLT2404-MST-V02 - East Glos Club (Offsite net gain) - EB Complete". No such file is returned by any search of the portal, so the figures cannot be checked against the calculation they come from.
25/01950/DIS CON	25/00346/FUL	48 Hanover Street, Cheltenham, GL50 4HQ	Metric or plan not published	The plan names a small sites metric at 4.14. No such file is returned by any search of the portal.
26/00429/DIS CON	25/00848/FUL	Stables at The Nurseries, Kidnappers Lane, Leckhampto	Recorded net gain below 10%	On the figures the form gives – $6.3 = 0.77$, $6.4 = 0.65$, $7.4 = 0.06$, $7.5 = 0.2$ – the area net gain is +2.60%. The metric gives off-site post-intervention 0.26252, not 0.2, which yields the +11.05% the form claims at 7.6. The plan as written does not

Document ref.	Planning ref.	Site	Defect	Detail
		n, GL53 0NR		demonstrate the gain it asserts.

B — Defective form

Document ref.	Planning ref.	Site	Defect	Detail
25/01242/AMEND	24/01520/FUL	Wallace House, Windermere Road, Hatherley, GL51 3PU	6.5 net change contradicts 6.3/6.4	6.3 = 0.0202, 6.4 = 0.0235 imply +0.0033; form states 0.0235
25/00403/DISCON	24/01880/FUL	5-6 Beechwood Close, Cheltenham, GL52 6QQ	7.6 records the combined net change, not the off-site net change	7.4 = 0.1 and 7.5 = 0.43 imply an off-site net change of +0.33, which is the figure at 4.9. The form gives +0.07 (+11.11%) at 7.6, which is the combined on-site plus off-site change. The metric confirms both.
25/01273/DISCON	24/02142/FUL	66 Bouncers Lane, Cheltenham, GL52 5JN	7.6 records the combined net change, not the off-site net change	7.4 = 0.07 and 7.5 = 0.14 imply +0.07 off site; the form gives +0.02 (+11.39%), the combined figure. Metric: off-site +0.0674, combined +0.0216.
25/01850/DISCON	24/01435/FUL	East Gloucestershire Club, Old Bath Road, Cheltenham, GL53 7DF	1.1 date precedes the survey and both signatures	Dated 31/08/2024 at 1.1, but the baseline survey is 17/10/2024, the ecologist signed 18/06/2025 and the applicant 10 November 2025.

Document ref.	Planning ref.	Site	Defect	Detail
				The relevant date fixes the pre-development value under paragraph 10 of Schedule 7A, so a date before the survey cannot be right.
26/00429/DISCON	25/00848/FUL	Stables at The Nurseries, Kidnappers Lane, Leckhampton, GL53 0NR	6.1 survey date not stated	Also 6.2 survey constraints left blank.
26/00429/DISCON	25/00848/FUL	Stables at The Nurseries, Kidnappers Lane, Leckhampton, GL53 0NR	7.6 records the combined net change, not the off-site net change	The +0.08 at 7.6 is the combined figure (metric +0.08484). The off-site net change is +0.20004.
26/00440/DISCON	26/00013/FUL	Cheltenham College, 138 Bath Road, Cheltenham, GL53 7LD	4.7 neither box ticked	Mandatory field left unanswered.
26/00440/DISCON	26/00013/FUL	Cheltenham College, 138 Bath Road, Cheltenham, GL53 7LD	7.4 and 7.5 record the combined totals, not the off-site values	The form gives 0.36 and 0.38. The metric gives off-site 0.222 rising to 0.34202; 0.36 and 0.38 are the on-site plus off-site totals.
26/00440/DISCON	26/00013/FUL	Cheltenham College, 138 Bath Road, Cheltenham, GL53 7LD	Section 6 not completed	6.1 to 6.6 are all unanswered. The plan states no pre-development and no post-development on-site biodiversity

Document ref.	Planning ref.	Site	Defect	Detail
				value, which is the particular paragraph 14 of Schedule 7A requires the authority to be satisfied about.

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
26/01194/DISBNG	24/01868/FUL	151 Prestbury Road, Cheltenham, GL52 2DU	Off-site uplift recorded but no allocation on the register	plan records +0.05 units

Cheshire West and Chester Council

2 plans, 2 defects

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
25/03368/BGP		Lady Heyes, Touring Park, Kingsley Road, Frodsham, WA6 6SU	1.2 planning application reference not stated	Re-read against the source document; the field is blank on the form.

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
25/02055/BGP	24/00984/FUL	Lloyd Drive, Ellesmere Port	Figures differ by a factor the spatial risk multiplier does not explain	plan +3.55, register 7.09 (ratio 2.00)

City of York Council

3 plans, 3 defects

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
AOD/25/00360	24/02342/FUL	Aldi, Unit 3, 248 Fulford Road, York	6.1 survey date given as a month only	Recorded as "October 2024" rather than a date.

Cotswold District Council

3 plans, 5 defects

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
26/00041/CONBGP	25/00650/FUL	Land at Nos. 26 to 48 Austin Road, Cirencester, Gloucestershire GL7 1B	Recorded net gain below 10%	area +9.9%

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
26/01627/CONBGP	25/02171/FUL	Stanmore House, Ewen, Cirencester, GL7 6BU (NGR SU 0006 9744)	Section 7 repeats the section 6 figures	7.4 and 7.5 give 1.8689/0.87 and 1.6412/0.9829, identical to 6.3 and 6.4.

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
26/00041/CONBGP	25/00650/FUL	Land at Nos. 26 to 48 Austin Road, Cirencester, Gloucestershire GL7 1B	Figures differ by a factor the spatial risk multiplier does not explain	plan +0.95, register 0.75 (ratio 0.79)
26/01627/CONBGP	25/02171/FUL	Stanmore House, Ewen, Cirencester, GL7 6BU (NGR SU 0006 9744)	Register allocates units but the plan records no off-site gain	register allocates 0.78 units
26/00485/CONBGP	24/03791/FUL	Applestone Court,	Off-site uplift	plan records

Document ref.	Planning ref.	Site	Defect	Detail
		Cirencester Road, Fairford, Gloucestershire, GL7 4BS	recorded but no allocation on the register	+0.54 units

County Durham Council

1 plan, 1 defect

East Suffolk Council

6 plans, 8 defects

A — Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
DC/25/3490/DRC	DC/24/4299/FUL	TM 29235 64175	Recorded net gain below 10%	area -62.7%
DC/26/0064/DRC	DC/25/0810/FUL	Land Opposite Rose Villas, Station Road, Brampton, Suffolk TM 41107 83	Recorded net gain below 10%	area -46.8%
DC/25/3453/DRC	DC/25/2261/FUL	28 St John's Rd, Bungay NR35 1LP	Recorded net gain below 10%	area +9.1%; hedgerow +0.0%

B — Defective form

Document ref.	Planning ref.	Site	Defect	Detail
DC/26/1510/DRC	DC/25/2432/FUL	55A Dobbs Lane, Kesgrave, Ipswich	Section 6 post- development value not completed	6.4 is blank for all three modules on the form, and 6.5 gives 0.00 area units with a stated change of +1.02%. 7.4 records 0.08 area units against a gain site at BGS- 140125001, but

Document ref.	Planning ref.	Site	Defect	Detail
				7.5 is not legible. Scanned plan read by OCR; excluded from the net-gain columns.
DC/25/2691/DRC	DC/24/0749/FUL	Halesworth Business Centre, Norwich Road, Halesworth, IP19 8QJ	6.5 net change contradicts 6.3/6.4	6.3 = 1.88, 6.4 = 0.8 imply - 1.0800; form states -1.09

C — Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
DC/26/0064/DRC	DC/25/0810/FUL	Land Opposite Rose Villas, Station Road, Brampton, Suffolk TM 41107 83	Figures differ by a factor the spatial risk multiplier does not explain	plan +0.22, register 1.46 (ratio 6.64)
DC/25/2691/DRC	DC/24/0749/FUL	Halesworth Business Centre, Norwich Road, Halesworth, IP19 8QJ	Off-site uplift recorded but no allocation on the register	plan records +1.33 units

Forest of Dean District Council

4 plans, 5 defects

A — Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
P0018/26/CONBGP	P1105/24/FUL	Forest of Dean District	Recorded net gain below 10%	hedgerow +7.7%
P0306/26/CONBGP	P1256/25/FUL	Box Bush Farm, Rodley, Gloucestershire (SO746131)	Recorded net gain below 10%	area +0.0%

C — Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
P0018/26/CONBGP	P1105/24/FUL	Forest of Dean District	Off-site uplift recorded but no allocation on the register	plan records +0.17 units
P0477/25/CONBGP	P0558/24/FUL	Barn 6, Greencroft Farm, Taynton, Gloucester, GL19 3AN	Off-site uplift recorded but no allocation on the register	plan records +0.51 units

Leeds City Council

7 plans, 10 defects

A — Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
25/01419/COND	24/06913/FU	St James's Hospital, Beckett Street, Burmantofts, Leeds LS9 7TF	Recorded net gain below 10%	hedgerow +8.3%
25/06232/COND	24/07415/FU	Thorpe Park Business Park, 1200 Century Way, Leeds, LS15 8ZA	Recorded net gain below 10%	hedgerow +9.0%
26/02779/COND	24/06637/FU	Alwoodley Community Association and Library, 60 The Avenue, Alwoodley,	Recorded net gain below 10%	Hedgerow units rise from 0.11 to 0.12, a gain of 9.09%. The plan records no off-site hedgerow provision, so the hedgerow module falls short of the 10% the condition requires. Area habitats reach +21.74%. Found on re-reading the source: the

Document ref.	Planning ref.	Site	Defect	Detail
				workbook had 0.127 at 6.4, where the form reads 0.12.

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
25/02600/COND	24/01253/FU	Queenshill Drive / Queenshill Avenue, Leeds, LS17 6BE	6.5 net change contradicts 6.3/6.4	6.3 = 4.6, 6.4 = 4.37 imply -0.2300; form states -0.24
25/07451/COND	24/06288/FU	Lotherton Hall Lotherton Lane Aberford Leeds LS25 3EB - OS grid ref SE	6.5 net change contradicts 6.3/6.4	6.3 = 32.96, 6.4 = 36.29 imply +3.3300; form states 3.34

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
25/02600/COND	24/01253/FU	Queenshill Drive / Queenshill Avenue, Leeds, LS17 6BE	Figures differ by a factor the spatial risk multiplier does not explain	plan +1.01, register 0.70 (ratio 0.69)
25/01125/COND	24/03775/FU	Moor Allerton Golf Club, Coal Road, Wike, Leeds, LS17, 9NH	Figures differ by a factor the spatial risk multiplier does not explain	plan +0.04, register 0.33 (ratio 8.25)
25/05559/COND	25/00843/FU	Knostrop Treatment Works, Knosthorpe Road, Leeds	Register allocates units but the plan records no off-site gain	register allocates 0.08 units

London Borough of Barnet

4 plans, 5 defects

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
26/1514/CON	25/5067/FUL	43 Tenterden Drive London NW4 1EA	Section 7 records the whole gain site, not the allocation	7.4 gives 53.39 area units against an on-site baseline of 0.0308, and 7.5 gives 0 while 7.6 claims +320.17%. The figures cannot all be true of the same scheme.
26/1232/BNG	25/3942/FUL	2 Lyonsdown Road, Barnet, EN5 1JB	6.5 net change contradicts 6.3/6.4	6.3 = 0.97, 6.4 = 1.07 imply +0.1000; form states 0.99

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
26/2395/BNG	25/0428/FUL	Bunns Lane Car Park, Mill Hill Broadway, London, NW7, 2JU.	Register allocates units but the plan records no off-site gain	register allocates 0.73 units

London Borough of Bexley

2 plans, 2 defects

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
25/00371/FUL01	25/00371/FUL01	Land Adjoining 43 Ladbrooke Crescent, Sidcup, DA14 4RU	Recorded net gain below 10%	area +0.0%

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
25/00736/FULM01	25/00736/FULM01	Clydesdale Way, Belvedere,	Register allocates units	register allocates 1.61

Document ref.	Planning ref.	Site	Defect	Detail
		London	but the plan records no off-site gain	units

London Borough of Camden

2 plans, 2 defects

A — Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
2025/0832/06BGP	2025/0832/06BGP	25-26 Woburn Square, TQ 29843 82109	Metric or plan not published	Metric was not supplied with the plan.

B — Defective form

Document ref.	Planning ref.	Site	Defect	Detail
2025/4280/06BGP	2024/4953/P	33-35 Jamestown Road and 211 Arlington Road, London NW1	6.1 survey date not stated	Given as "n/a".
2025/4280/06BGP	2024/4953/P	33-35 Jamestown Road and 211 Arlington Road, London NW1	Section 6 pre-development value not completed	6.3 is blank in all three modules. The metric gives the on-site baseline as 0.0282, so a value exists; it is simply not on the form.
2025/4280/06BGP	2024/4953/P	33-35 Jamestown Road and 211 Arlington Road, London NW1	6.4 records the pre-development value, not the post-development value	6.4 gives 0.03. The metric gives the baseline as 0.0282 and the post-intervention value as 0.9101. 6.5 states +0.88 and 3127%, which reconciles with the metric, so the post-development

Document ref.	Planning ref.	Site	Defect	Detail
				value of 0.91 appears nowhere on the form.

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
2025/0958/P	2025/0958/P	Main Quadrangle and Wilkins Building, Gower Street, London, WC1E 6BT	Off-site uplift recorded but no allocation on the register	plan records +0.72 units

London Borough of Lewisham

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
DC/25/138695		Sydenham High School	Metric published but no biodiversity gain plan	A search of the portal by application type "Approval of Details – BNG", decided cases only, returns the statutory metric for this case but no biodiversity gain plan. The metric records on-site area units rising from 0.788 to 1.094 (+38.82%) and hedgerow units from 0.138 to 0.311 (+125.31%).
DC/25/141766		64 Speedwell Street, Lewisham	Metric published but no biodiversity gain plan	A search of the portal by application type "Approval of Details – BNG", decided cases only, returns the statutory

Document ref.	Planning ref.	Site	Defect	Detail
				metric for this case but no biodiversity gain plan. The small sites metric records area units rising from 0.189 to 0.314 (+66.17%). Its own headline advises "Check for input errors/rule breaks present in the metric".
DC/26/143565		Site not named in the metric	Metric published but no biodiversity gain plan	A search of the portal by application type "Approval of Details – BNG", decided cases only, returns the statutory metric for this case but no biodiversity gain plan. The metric records area units rising from 0.041 to 0.052 (+25.83%), with hedgerow units created from a zero baseline.
DC/26/143634		69-73 Lausanne Road	Metric published but no biodiversity gain plan	A search of the portal by application type "Approval of Details – BNG", decided cases only, returns the statutory metric for this case but no biodiversity gain plan. The metric records area units falling from 0.726 to 0.493, a net loss of 32.03%. Off-site provision could in principle make

Document ref.	Planning ref.	Site	Defect	Detail
				that up, but the document that would say so is the gain plan, and none is published.

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
DC/26/143904		TQ403729	1.2 planning application reference not stated	Mandatory field left blank. The plan is a scan with no text layer and was read by OCR.

London Borough of Southwark

3 plans, 4 defects

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
25/AP/1335	24/AP/2313	41 Linden Grove, London, SE15 3LW	6.5 net change contradicts 6.3/6.4	6.3 = 0.5, 6.4 = 0.57 imply +0.0700; form states 0.6
25/AP/2778	24/AP/1958	18-62 Newington Causeway, 69 and 82-83 Borough Road, Southwark, SE1 6D	1.1 date of the plan not stated	Re-read against the source document; the field is blank on the form.
26/AP/0477	24/AP/0892	Chatelain House, 182-202 Walworth Road, London, SE17 1JJ	6.5 net change contradicts 6.3/6.4	6.3 = 0.44, 6.4 = 0.7 imply +0.2600; form states 0.63

London Borough of Tower Hamlets

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
PA/24/01522/S	PA/24/00383	Union Square, Canary Wharf, E14 9QH	Metric or plan not published	The plan names its calculation at 4.14 as "552665ac16Aug24DV01_SBM". No metric calculation is published against this application.
PA/26/00688/S	PA/24/00922/A1	Teviot Estate, London, E14 6QP	Recorded net gain below 10%	On-site watercourse units are unchanged at 0.05, a 0% change. 4.6 states the gain will be achieved both on and off site and 4.9 puts the off-site requirement at 0.055 watercourse units, but section 7 records nothing.

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
PA/24/01522/S	PA/24/00383	Union Square, Canary Wharf, E14 9QH	6.1 survey date given as a month only	Given as "January 2024".
PA/25/01840/S	PA/24/00568	Empson Street Industrial Estate, E3	6.1 survey date not stated	Mandatory field left blank.
PA/25/01840/S	PA/24/00568	Empson Street Industrial Estate, E3	6.4 records net change, not post-development value	6.4 gives 0.36. The metric records the on-site baseline at 0.2652 rising to 0.6219 post-intervention, a net change of +0.3567 – which is the 0.36 entered. The +134.50% the form states at 6.5 is right.
PA/26/00688/S	PA/24/00922/A1	Teviot Estate, London, E14 6QP	Section 2 developer details not completed	2.1 to 2.5 are all blank. Article 37C(2)(a) requires the name and

Document ref.	Planning ref.	Site	Defect	Detail
				address of the applicant.
PA/26/00688/S	PA/24/00922/A1	Teviot Estate, London, E14 6QP	7.2 no gain site register reference	4.6 states both on and off site and 4.9 puts the off- site requirement at 0.055 watercourse units, but 7.2 gives "N/A".
PA/26/00688/S	PA/24/00922/A1	Teviot Estate, London, E14 6QP	Section 7 not completed	7.4, 7.5 and 7.6 are all blank although 4.6 states the gain will be achieved both on and off site.
PA/26/00688/S	PA/24/00922/A1	Teviot Estate, London, E14 6QP	8.1 neither box ticked	Mandatory field left unanswered. Read from the page: the text layer of this plan is damaged and reports several answered boxes as blank.

North Devon Council

3 plans, 3 defects

A — Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
81607	81325	Higher Viveham, Muddiford, Barnstaple, Devon EX31 4EY	Recorded net gain below 10%	area +0.0%

C — Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
81018	78790	Marisco Lane To Saunton Sands, Saunton, Devon EX33 1LG	Figures differ by a factor the spatial risk multiplier does not explain	plan -0.44, register 0.70 (ratio -1.59)

Resolved on inspection of the metric

Document ref.	Planning ref.	Site	Defect	Detail
80603	80166	Footpath adjacent Tarka Tennis Centre / Long stay Car Park, Seven Bret	Recorded net gain below 10%	area +0.0%

North Somerset Council

10 plans, 15 defects

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
25/P/1992/AOC	22/P/2920/FUL	Land At Ladymeade Lane, Churchill, Winscombe, North Somerset, BS25 5NH	6.5 net change contradicts 6.3/6.4	6.3 = 4.97, 6.4 = 0.98 imply - 3.9900; form states -4
25/P/0581/AOC	23/P/2185/FU2	ST 55669 70371	1.1 date of the plan not stated	Re-read against the source document; the field is blank on the form.
25/P/1438/AOC	25/P/1174/FUL	Land At Sheephouse Park And ,South Of Sewage Treatment Works, Marsh La	6.5 net change contradicts 6.3/6.4	6.3 = 21.92, 6.4 = 24.16 imply +2.2400; form states 2.25
26/P/0340/AOC	25/P/1496/FU2	ST 55669 70371	1.1 date of the plan not stated	Re-read against the source

Document ref.	Planning ref.	Site	Defect	Detail
				document; the field is blank on the form.
26/P/0435/AOC	25/P/1910/FUL	Land adjacent to 32 Falcon Crescent, Weston-super-Mare, BS22 8RX	1.1 date of the plan not stated	Re-read against the source document; the field is blank on the form.
25/P/0893/AOC	24/P/1982/FUL	Land at Sheephouse Park, Marsh Lane, Easton-in-Gordano, BS20 0TD	7.2 no gain site register reference	7.2 reads "TBC - subject to legal agreement" and 7.3 "TBC with North Somerset Council", so the off-site provision was not secured when the plan was approved.
25/P/0893/AOC	24/P/1982/FUL	Land at Sheephouse Park, Marsh Lane, Easton-in-Gordano, BS20 0TD	7.6 records the combined net change, not the off-site net change	The +0.60 (+10.18%) at 7.6 is the combined figure; the off-site net change is +4.98, which is the figure at 4.9.

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
25/P/1992/AOC	22/P/2920/FUL	Land At Ladymeade Lane, Churchill, Winscombe, North Somerset, BS25 5NH	Off-site uplift recorded but no allocation on the register	plan records +4.51 units
25/P/1438/AOC	25/P/1174/FUL	Land At Sheephouse Park And ,South Of Sewage Treatment	Register allocates units but the plan records no off-site gain	register allocates 0.12 units

Document ref.	Planning ref.	Site	Defect	Detail
		Works, Marsh La		
25/P/1859/AOC	24/P/2162/R3	Grove Park, Grove Lane, Weston-super-Mare (Grid ref ST 31899 61899)	Off-site uplift recorded but no allocation on the register	plan records +0.33 units

Northumberland County Council

2 plans, 3 defects

A — Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
26/00782/DISCON	25/01671/FUL	Land south west of Chollerton, Northumberland (NY 91751 73508)	Recorded net gain below 10%	area -21.1%
25/03977/DISCON	25/01199/FUL	Westgate Labs, Middle Stobswood, Widdrington Station, Northumberland,	Recorded net gain below 10%	Hedgerow units are 0.01 before and 0.01 after, a gain of 0%, with no off-site hedgerow provision. Area habitats reach +22.22%. Found on re-reading the source: the workbook had 0.0184 at 6.4, where the form reads 0.01.

B — Defective form

Document ref.	Planning ref.	Site	Defect	Detail
26/00782/DISCON	25/01671/FUL	Land south west of Chollerton, Northumberland (NY 91751 73508)	6.5 net change contradicts 6.3/6.4	6.3 = 2.89, 6.4 = 0.37 imply - 2.5200; form states -1.56

Plymouth City Council

6 plans, 8 defects

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
26/00257/CDM	25/00220/FUL	Hoe Park, Armada Way, The Hoe, Plymouth PL1 2PA	Recorded net gain below 10%	area +9.1%

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
26/00874/CDM	26/00103/FUL	Plym Valley Railway Co. Ltd Marsh Mills Station Coypool Road Plympton	6.5 net change contradicts 6.3/6.4	6.3 = 0.16, 6.4 = 0.2 imply +0.0400; form states 20.48
25/00478/CDM	24/00775/FUL	Land At Wixenford Saltram Estate Plympton PL7 1UH	1.1 date of the plan not stated	Re-read against the source document; the field is blank on the form.

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
26/00257/CDM	25/00220/FUL	Hoe Park, Armada Way, The Hoe, Plymouth PL1 2PA	Off-site uplift recorded but no allocation on the register	plan records +0.01 units
25/01061/CDM	23/00740/MOR	Land to the Rear of 13 Westfield Avenue, Plymouth, PL9 9PE	Off-site uplift recorded but no allocation on the register	plan records +0.35 units
26/00593/CDM	25/00429/FUL	19 Pomphlett Road, Plymouth, PL9 7BH	Off-site uplift recorded but no allocation on the register	plan records +0.33 units

Royal Borough of Greenwich

5 plans, 5 defects

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
25/0625/BGP	24/2585/F	Colfe's School, Horn Park Lane, London SE12 8AW	6.5 net change contradicts 6.3/6.4	6.3 = 1.81, 6.4 = 2.01 imply +0.2000; form states 0.21

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
26/1218/SD	21/0171/F	21A Lavidge Road, London, SE9 3NE	Off-site uplift recorded but no allocation on the register	plan records +0.05 units
24/3918/BGP	24/1164/F	Development site at former Kidbrooke Park Primary School, Hargood Road	Off-site uplift recorded but no allocation on the register	plan records +2.45 units
25/3495/BGP	24/3026/F	TQ 39080 80317	Off-site uplift recorded but no allocation on the register	plan records +0.24 units

Shropshire Council

4 plans, 4 defects

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
26/02473/DIS	26/02473/DIS	Berrisford Road, Market Drayton, Shropshire (proposed holiday cabins n	1.1 date of the plan not stated	Re-read against the source document; the field is blank on the form.

South Cambridgeshire District Council

10 plans, 15 defects**A – Statutory breach**

Document ref.	Planning ref.	Site	Defect	Detail
24/01213/CONDC	24/01213/FUL	6 Angle Lane, Shepreth, Cambridgeshire, SG8 6QH	Recorded net gain below 10%	area +2.6%
24/03781/CONDB	24/03781/S73	69 Cambridge Road, Milton, Cambridgeshire, CB24	Recorded net gain below 10%	area -58.7%

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
24/01079/COND37	24/01079/FUL	440 Cambridge Science Park, Milton, Cambridge, CB4 0QA	1.1 date of the plan not stated	Re-read against the source document; the field is blank on the form.
24/03781/CONDB	24/03781/S73	69 Cambridge Road, Milton, Cambridgeshire, CB24	1.1 date of the plan not stated	Re-read against the source document; the field is blank on the form.

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
24/01213/CONDC	24/01213/FUL	6 Angle Lane, Shepreth, Cambridgeshire, SG8 6QH	Off-site uplift recorded but no allocation on the register	plan records +0.98 units
25/02340/CONDA	25/02340/FUL	Thriplow Farm Phase 1, Cambridgeshire	Off-site uplift recorded but no allocation on the register	plan records +0.33 units
25/02341/CONDA	25/02341/FUL	Thriplow Farm Phase 2,	Off-site uplift recorded but no	plan records +0.29 units

Document ref.	Planning ref.	Site	Defect	Detail
		Cambridgeshire	allocation on the register	
24/01215/CONDD	24/01215/FUL	39 Pierce Lane, Fulbourn	Off-site uplift recorded but no allocation on the register	plan records +0.29 units
24/03049/CONDB	24/03049/FUL	Impington Village College, New Road, Impington, Cambridgeshire, CB24 9	Off-site uplift recorded but no allocation on the register	plan records +1.07 units
24/03629/COND7	24/03629/FUL	Land south of Newmarket Road and east of Airport Way, Fen Ditton, Camb	Off-site uplift recorded but no allocation on the register	plan records +1.17 units
24/04781/CONDA	24/04781/FUL	Land between 9 and 10 The Cedars, Bassingbourn, Cambridgeshire, SG8 5R	Off-site uplift recorded but no allocation on the register	plan records +0.44 units
25/04724/CONDA	25/04724/FUL	Junction of Fulbourn Old Drift and Gazelle Way, Cambridge	Off-site uplift recorded but no allocation on the register	plan records +0.21 units

South Gloucestershire Council

5 plans, 7 defects

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
DOC25/00265/BNG	P24/02516/F	Burnwood Stables, Ram Hill, BS36 2UF	Recorded net gain below 10%	hedgerow +8.3%
DOC25/00366/BNG	P25/01329/F	Land at 1	Recorded net	hedgerow +0.0%

Document ref.	Planning ref.	Site	Defect	Detail
		Glenwood Drive, Oldland Common, Bristol, BS30 9RZ	gain below 10%	

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
DOC25/00366/BNG	P25/01329/F	Land at 1 Glenwood Drive, Oldland Common, Bristol, BS30 9RZ	6.5 net change contradicts 6.3/6.4	6.3 = 0.03, 6.4 = 0.01 imply - 0.0200; form states -0.2
DOC25/00071/BNG	P24/01262/F	Gravel Hill Road, Yate (ST 72131 84087)	6.5 net change contradicts 6.3/6.4	6.3 = 2.54, 6.4 = 3.17 imply +0.6300; form states 5.28
DOC25/00230/BNG	P24/02577/F	Land At Redfield Hill, Bitton, South Gloucestershire	6.5 net change contradicts 6.3/6.4	6.3 = 0.59, 6.4 = 0.48 imply - 0.1100; form states 0.07
DOC25/00340/BNG	P25/01344/F	Car Park Land At Airbus UK, New Road, Filton, South Gloucestershire	1.1 date of the plan not stated	Re-read against the source document; the field is blank on the form.

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
DOC25/00366/BNG	P25/01329/F	Land at 1 Glenwood Drive, Oldland Common, Bristol, BS30 9RZ	Off-site uplift recorded but no allocation on the register	plan records +0.04 units

Trafford Council

6 plans, 7 defects

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
117014/CND/25	114884/FUL/24	Land To The Rear Of 28-34 Stokoe Avenue, Altrincham, WA14 4LF	Recorded net gain below 10%	watercourse - 90.0%
118134/CND/26	117039/FUL/25	Land At Lacy Street, Stretford	Recorded net gain below 10%	area -47.9%; watercourse +0.0%

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
118243/CND/26	116985/FUL/25	Trafford Bank House, 32 Brindley Road, Old Trafford, Stretford, Manche	6.5 net change contradicts 6.3/6.4	6.3 = 2.22, 6.4 = 1.02 imply - 1.2000; form states 1.2
117454/CND/25	113137/FUL/24	Land Adjacent To 103 Shetland Way, Davyhulme, M41 7FU	Section 7 records the whole gain site, not the allocation	7.4 gives 15.22 rising to 7.5 = 49.72 against an on-site baseline of 1.06. 6.3 and 6.4 also mix on-site and off-site figures in the same box as free text.

C – Register discrepancy

Document ref.	Planning ref.	Site	Defect	Detail
117014/CND/25	114884/FUL/24	Land To The Rear Of 28-34 Stokoe Avenue, Altrincham, WA14 4LF	Figures differ by a factor the spatial risk multiplier does not explain	plan +3.50, register 3.29 (ratio 0.94)
115377/CND/25	113251/FUL/24	Land To East of Thirsk Avenue And Chepstow	Register allocates units but the plan records no off-	register allocates 1.55 units

Document ref.	Planning ref.	Site	Defect	Detail
		Avenue, Sale	site gain	
117902/CND/25	115013/FUL/24	Land between 29-31 Brook Road, Urmston, M41 5RQ	Register allocates units but the plan records no off-site gain	register allocates 0.24 units

Worthing Borough Council

1 plan, 4 defects

A – Statutory breach

Document ref.	Planning ref.	Site	Defect	Detail
AWDM/0169/26	AWDM/0433/25	SITE OF HM REVENUES AND CUSTOMS AND LAND WEST, OF HM REVENUES AND CUST	Metric or plan not published	The plan names its calculation at 4.14 as "P10141. Land at Barrington Road, Goring-by-Sea - With off-site". No metric calculation is published against the application, and 4.13 – whether the statutory metric tool was used at all – has neither box ticked. The whole of the claimed gain is off site, so there is nothing published against which the figures at 7.4 to 7.6 can be checked.

B – Defective form

Document ref.	Planning ref.	Site	Defect	Detail
AWDM/0169/26	AWDM/0433/25	SITE OF HM REVENUES AND CUSTOMS AND	Section 6 not completed	6.1 to 6.7 are all unanswered. The plan states no pre-

Document ref.	Planning ref.	Site	Defect	Detail
		LAND WEST, OF HM REVENUES AND CUST		development and no post- development on- site biodiversity value.