



ECOLOGICAL ADVICE SERVICE

TO: Amanda Cue
FROM: Nancy Inman
DATE: 03 October 2025
SUBJECT: Land NW Of Factory Rd, Northfleet 20250550

The following is provided by Kent County Council's Ecological Advice Service (KCC EAS) for Local Planning Authorities. It is independent, professional advice and is not a comment/position on the application from the county council. It is intended to advise the relevant planning officer(s) on the potential ecological impacts of the planning application and if sufficient/appropriate ecological information has been provided.

Any additional information, queries or comments on this advice that the applicant or other interested parties may have must be directed in every instance to the planning officer, who will seek input from the EAS where appropriate and necessary.

SUMMARY: ADDITIONAL INFORMATION REQUIRED

At present the site offers little value for protected species as it consists largely of bare ground. We require confirmation as to whether the recent habitat clearance was undertaken under existing planning permission as if it was not taken place as part of extant permissions then pre-clearance habitats will need to be used as the BNG baseline and a precautionary approach given to assessing habitat type and condition.



Fig 1 and 2: Habitats onsite 2020 and 2025

The Town and Country Planning Act 1990, Schedule 7A (6 and 6B) seeks to discourage developers from engaging in site clearance prior to making a planning application. This legislation essentially states that if habitat degradation/loss has occurred on an application site on or after 30 January 2020, *“the pre-development biodiversity value of the onsite habitat is to be taken to be its biodiversity value immediately before the carrying on of the activities.”*

This rule does not apply if the activities were carried out in accordance with planning permission before 25 August 2023. This rule also does not apply if the activities were carried out in accordance with planning permission after 25 August 2023, but in this case only if the consented development has been completed.

Where the pre-development biodiversity value of a given site is unknown, this legislation (i.e. paragraph 6B) states that the baseline *“is to be taken to be the highest biodiversity value of the onsite habitat which is reasonably supported by any available evidence relating to the onsite habitat.”*

If you have any queries regarding our comments, please do not hesitate to get in touch.

Nancy Inman
Biodiversity Officer

This response was submitted following consideration of the following documents:

- Biodiversity Net Gain Technical Note and Metric (AAe, May 25)
- Preliminary Ecological Appraisal (AAe, April 25)
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