



ECOLOGICAL ADVICE SERVICE

TO: *Alison Webster*

FROM: *Helen Forster*

DATE: *22 December 2025*

SUBJECT: *Kimberly Clark Ltd Northfleet 20251115 and 20251133*

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.

The following comments are valid for both applications. We understand that since both applications have been submitted it is not possible to achieve a BNG of over 10% on either site within the applicants landholdings. Therefore it is proposed to do BNG on land outside the applicants ownership.

BIODIVERSITY GAIN CONDITION DISCHARGE

This development requires a 10% mandatory biodiversity net gain under legislation.

The general biodiversity gain condition as per Schedule 7A, Section 13(1) of the Town and Country Planning Act 1990 is that the development may not be begun unless—

- (a) a biodiversity gain plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

We have reviewed the submitted documents (Biodiversity Gain Plan and Statutory metric) in relation to the general biodiversity gain condition of permission 20250406 and 20250251 and advise that **insufficient** information has been provided to discharge the deemed condition for the following reasons:

- the metric has not been submitted or alternatively uploaded on to the planning portal.

- It is not appropriate for statutory credits to be used for this site
- Details of the off site habitat bank has not been provided
- Evidence to demonstrate that the off site units purchased have been registered on the national register.

The submitted information has detailed that statutory credits will be used and it is our view that this is not an appropriate approach. The gov.uk Guidance ([Statutory biodiversity credits - GOV.UK](#)) details that statutory credits can only be used if the following criteria have been met:

1. *Evidence that they considered on-site BNG and the reasons why this is not possible.*
2. *Evidence that the developer approached 3 local or national suppliers, habitat banks or trading websites and that insufficient off-site options are available in England. For example, correspondence emails or a PDF download showing a marketplace search.*

The PEA details that the development sites support modified grassland, mixed scrub and tall ruderal and therefore we advise that will be possible to purchase off site units for these habitats and therefore the criteria for purchasing statutory credits cannot be met.

We advise that the following information is required to discharge the condition:

- Excel statutory metric
- Details of the off site habitat bank
- Correctly filled in biodiversity gain plan
- Evidence that the units purchased has been registered on the national register ([Search the biodiversity gain sites register - GOV.UK](#))

Helen Forster MCIEEM
Biodiversity Officer

This response was submitted following consideration of the following documents:
Biodiversity Gain Plan
Statutory Metric (PDF not excel spreadsheet)