



ECOLOGICAL ADVICE SERVICE

TO: Alison Webster
FROM: Emma England
DATE: 24 February 2026
SUBJECT: 20251133 / Kimberly Clark Ltd Northfleet

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.

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 advise that **insufficient** information has been provided to discharge the deemed condition for the following reason:

- Evidence to demonstrate that the off-site units purchased have been registered on the national register;
- On-site post-development habitat plan.

Information has been submitted to show that an off-site habitat bank will be used to achieve the required BNG. However, it is not currently clear that the biodiversity gain has been registered on the biodiversity gain site register. Although a biodiversity unit purchase

certificate has been submitted with condition discharge application, along with the gain site reference number: **BGS-280824001**, on review of the allocations for this gain site, 20250251 for Gravesham Borough Council does not feature as an allocation. We suspect there is a lag between the biodiversity unit purchase and allocation on the gain site register. However, it would be preferable to confirm the allocation is official prior to condition discharge. We carried out a check of [BNG: Biodiversity gain site records](#) on 24th February 2026.

Table 1 shows a summary of the information as submitted. Further details are provided in Table 2.

Table 1: To show a summary of our review of submitted information

Percentage Net Gain Required	Percentage Net Gain/Loss Reported for Area Habitats	Percentage Net Gain/Loss Reported for Linear Habitats	Net Gain Proposed: 1 – all on-site; 2 – no significant on-site and off-site; 3 – significant on-site and off-site	On-site 'significant' Net Gains Proposed (Yes/No)
10%	+10.57%	N/A	2 – no significant on-site habitat, all biodiversity net gain provided off-site.	No

Detailed Comments

Legislation and government standing advice indicates that the information shown in Table 2¹ needs to be submitted to and approved by the local planning authority as part of the 'deemed condition' biodiversity gain plan prior to commencement of development.

References to the biodiversity value of any habitat or habitat enhancement are to its value as calculated in accordance with the biodiversity metric. As such, a copy of the completed biodiversity metric calculation tool, in excel spreadsheet format, has been submitted as part of this submission in conjunction with the biodiversity gain plan. The local planning authority must approve the biodiversity gain plan; without approval, the development may not commence.

Table 2: To show the information required for the biodiversity gain plan under legislation and as indicated by government standing advice, and whether the submitted information is sufficient.

Information Needed	Provided	Comments
The steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the on-site habitat and any other habitat. And, (except for onsite irreplaceable habitats) a description of how the biodiversity gain hierarchy will be followed and where to the extent any actions (in order of priority) in that hierarchy are not followed and the reason for that.	Yes	The applicant is required by law to deliver biodiversity gains in accordance with the biodiversity gain hierarchy, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 Section 37A. We are satisfied that the applicant has appropriately applied the hierarchy to this development.
The relevant date , for the purposes of calculating the pre-development biodiversity	Yes	With the original application, the applicant provided the date of 28 th April 2023 as the

¹ For development not proceeding in phases. For phased development there are different requirements for the Biodiversity Gain Plan.

value of onsite habitats and if proposing an earlier date, the reasons for using this earlier date.		date of the pre-development biodiversity site walkover. This walkover informed the biodiversity metric calculations. This was considered acceptable to inform the application.
The completed biodiversity metric calculation tool(s) , stating the publication date of the tool(s), and showing the calculation of the pre-development onsite value on the relevant date , and post-development biodiversity value. And, evidence that biodiversity gain objective can be met.	Yes – but needs review following the production of plans.	We have reviewed the metric and we are satisfied that it has been correctly filled in and no amendments are required. We understand that the site area (1.34 ha) will comprise mixed scrub, built surfaces, and modified grassland post-construction. We understand there is no condition for detailed landscaping plans. The only habitat with a biodiversity value to be created post-development is modified grassland habitat in poor condition. This habitat is easy to achieve. We therefore do not consider it necessary to request detailed landscaping plans as part of this condition discharge. However, we do request that a scaled plan showing the direction of north be produced to show the post-development habitats proposed, including the location and quantifiable areas of the mixed scrub and modified grassland. The biodiversity metric calculation tool should be reviewed and updated as required.
Pre-development and post-development plans showing the location of onsite habitat (including any irreplaceable habitat) on the relevant date , and drawn to an identified scale and showing the direction of North.	Yes	A pre-development habitat plan is available within the submitted preliminary ecological appraisal. An on-site post-development habitat plan has not been produced to align with the biodiversity metric calculation tool's habitat types. A plan needs to be produced to guide construction, and to demonstrate the achievability of post-development calculations on-site. Off-site habitat plans are available.
A description of any irreplaceable habitat on the land to which the plan relates which exist on the relevant date , and any part of the development for which planning permission is granted where the onsite habitat of that part is irreplaceable habitat, arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.	N/A	None present on site
If habitat degradation has taken place: • a statement to this effect, • the date immediately before the degradation activity, • the completed biodiversity tool showing the calculation of the biodiversity value of the onsite habitat on that date, and • any available supporting evidence for the value.	Yes	We understand that no habitat degradation was approved as part of the parent permission, and no habitat degradation had taken place in advance of setting the habitat baseline.
Where any registered off-site biodiversity gain is specified in the plan and allocated to	No	We advise that we are satisfied that an off-site BNG of at least 10% can be achieved.

the development: - o The registered off-site biodiversity gain is so allocated (and, if the allocation is conditional, that any conditions attaching to the allocation have been met, or will be met by the time to development begins), and - o The registered off-site biodiversity gain has the biodiversity value specified in the plan in relation to the development.		An off-site habitat bank will be used to achieve the BNG, however, it is currently not clear that the biodiversity gain has been registered on the biodiversity gain site register. Although a biodiversity unit purchase certificate has been submitted with condition discharge application, along with the gain site reference number: BGS-280824001, on review of the allocations for this gain site, 20250251 for Gravesham Borough Council does not feature as an allocation. We suspect there is a lag between the biodiversity unit purchase and allocation on the gain site register. However, it would be preferable to confirm the allocation is official prior to condition discharge. We carried out a check of BNG: Biodiversity gain site records on 24th February 2026. We are satisfied that the reasons for using a BNG habitat bank are appropriate for this application.
Evidence that any biodiversity credits specified in the plan have been purchased.	N/A	
Name and address of the person completing the Plan, and (if different) the person submitting the Plan.	Yes	
A description of the development and planning permission reference number (to which the Plan relates).	Yes	
A description of arrangements for maintenance and monitoring of habitat enhancement to which paragraph 9(3) of Schedule 7A to the 1990 Act applies (habitat enhancement which must be maintained for at least 30 years after the development is completed).	Yes	

Emma England
Biodiversity Officer

This response was submitted following consideration of the following documents:

Allison, C. (January 2026) Biodiversity Gain Plan for 20250251.

Allison, C. and Environment Bank (January 2026) Biodiversity Metric Calculation Tool, Main Metric for 20250251.

EBL HB Limited and Mid Devon District Council (August 2024) Agreement pursuant to Section 106 of the Town and Country Planning Act 1990 and other powers relating to Off-site Biodiversity Mitigation. Single Phase Habitat Bank at Puddington Moor, Puddington.

*Environment Bank (January 2026) Biodiversity Unit Purchase Certificate. MDEV07
Puddington. BGS-280824001.*

*ITP Energised (March 2025) Preliminary Ecological Appraisal. Northfleet Pulp Storage
Site.*