



ECOLOGICAL ADVICE SERVICE

TO: Kelly Joyce
FROM: Emma England
DATE: 25 November 2025
SUBJECT: 20250990 / Northfleet School for Girls

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

The advice below applies to informative 1, condition 3 and condition 4. Wording is provided in Appendix 1. Confirmation has been provided by the applicant that there have been no changes to the biodiversity metric calculations/ landscaping drawings/plans since the original application. For ease of reference and for the sake of clarity, the latest applicable documents and plans should be uploaded to the public register for 20250990. This should include:

- Fry, M. (November 2024) *Small Sites Metric Calculation Tool. Northfleet School for Girls. V1.0.*
- Greenlink Ecology Ltd (November 2025) *Biodiversity Net Gain (BNG) Proposed Plan. Land at Northfleet School for Girls, Gravesend.*
- Greenlink Ecology Ltd (November 2025) *Biodiversity Net Gain (BNG) Baseline Plan. Land at Northfleet School for Girls, Gravesend.*

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

We have reviewed the submitted documents in relation to the general biodiversity gain condition of permission 20240438 and advise that **sufficient** information has been provided to discharge the deemed condition, condition 3 and condition 4.

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.

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 ¹ (Yes/No)
10%	+17.09%	N/A	1 – all on-site	Yes

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, have been submitted as part of this submission in conjunction with the biodiversity gain plan and uploaded to the public register. 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 value of onsite habitats and if proposing an earlier date, the reasons for using this earlier date.	Yes	With the original application, 21 st November 2024 was provided as the date the site walkover survey was carried out, the findings of which were used to complete the biodiversity metric calculations post ecological walkover survey. The site survey date is considered acceptable to inform the habitat baseline for this application.

¹ See Appendix 2

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	We have reviewed the metric that was submitted with 20240438 and we are satisfied that it has been correctly filled in and no amendments are 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 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: - o a statement to this effect, - o the date immediately before the degradation activity, - o the completed biodiversity tool showing the calculation of the biodiversity value of the onsite habitat on that date, and - o any available supporting evidence for the value.	Yes	We understand from application 20240438 that no on-site habitat degradation has occurred since 30 th January 2020.
Where any registered off-site biodiversity gain is specified in the plan and allocated to 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.	N/A	-
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	An HMMP has been submitted to discharge condition 3. This document is considered satisfactory.

Emma England
Biodiversity Officer

This response was submitted following consideration of the following documents:

Fry, M. (November 2024) Small Sites Metric Calculation Tool. Northfleet School for Girls. V1.0.

Greenlink Ecology Ltd (November 2025) Biodiversity Net Gain (BNG) Proposed Plan. Land at Northfleet School for Girls, Gravesend.

Greenlink Ecology Ltd (November 2025) Biodiversity Net Gain (BNG) Baseline Plan. Land at Northfleet School for Girls, Gravesend.

Lincoln, L. (September 2025) HMMP on the Natural England template. Land at Northfleet School for Girls, Gravesend. Lloydbore.

Lincoln, L. (September 2025) Biodiversity Gain Plan for 20240438. Northfleet School for Girls, Gravesend.

Appendix 1 – Condition and Informative Wording

CONDITIONS:-

3. *The development hereby permitted shall not commence until a Habitat Management and Monitoring Plan (HMMP), prepared in accordance with the approved Biodiversity Gain Plan, has been submitted to, and approved in writing by, the Local Planning Authority. The HMMP shall include the following components;*

- (a) A non-technical summary;*
- (b) The roles and responsibilities of the people or organisation(s) delivering the HMMP;*
- (c) The planned habitat retention, creation and enhancement works to conserve, create and/or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan. This shall include the provision of scaled and detailed soft landscaping plans, as well as planting schedules and any proposed habitat features;*
- (d) The management measures to conserve, maintain and improve habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
- (e) The monitoring methodology and frequency in respect of the retained, created and/or enhanced habitat.*

The development shall be carried out in accordance with the approved HMMP.

Reason: *To ensure the development delivers the required biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990.*

4. *The Biodiversity Gain Plan shall be prepared in accordance with the Biodiversity Net Gain (BNG) Proposed Plan submitted with the planning application and dated 25 November 2024 (prepared by Greenlink Ecology Ltd) unless otherwise agreed in writing with the Local Planning Authority.*

Reason: *To ensure the development delivers the required biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990*

INFORMATIVES:-

1 **BIODIVERSITY NET GAIN CONDITION** *The development hereby permitted is subject to the general condition of planning permission relating to biodiversity gain as per Schedule 7A 13(1) of the Town and Country Planning Act 1990. The condition 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.*

Appendix 2: On-Site Significance Calculator

Table 3: On-site Significance of Habitats Calculator

Row No.	On-site Habitat	Present (Y/N)	No. of Habitat Area Units	No. of Hedge Units	Comments
1	Created habitats of medium distinctiveness	Y	0.5036 + 0.0498 = 0.5534	-	The creation of other neutral grassland and the planting of 4 new trees.
2	Created habitats of high distinctiveness	N	-	-	-
3	Created habitats of very high distinctiveness	N	-	-	-
4	Created habitats of low distinctiveness making up many biodiversity units (BU) relative to biodiversity value pre-development	N/A	-	-	Local guidance indicates that the creation of low distinctiveness habitats should not be considered significant for sites qualifying for the small sites metric.
5	Created habitats have increased distinctiveness compared to pre-development (e.g., modified grassland to other neutral grassland)	Y	-	-	The creation of other neutral grassland has higher distinctiveness than the modified grassland present on-site at baseline.
6	There have been enhancements proposed to the raise the distinctiveness of retained habitats.	-	-	-	-
7	There have been enhancements proposed to the condition of retained habitats	-	-	-	-
8	Habitat creation or enhancement of low distinctiveness habitats or higher is significant in area relative to size of development (excluding individual trees and vertical habitats).	N/A	-	-	Local guidance indicates that the creation/enhancement of low distinctiveness habitats should not be considered significant for sites qualifying for the small sites metric.
Total biodiversity habitat units (BU) delivered by relevant creation/enhancement action: 0.5534					
The above table indicates that the on-site habitat is considered significant because of the creation of other neutral grassland and the planting of new trees.					

* National guidance indicates that significant enhancements contribute significantly to the proposed development's biodiversity net gain relative to the biodiversity value before development e.g.,:

- o Habitats of medium or higher distinctiveness in the biodiversity metric;

- o Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development;
- o Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development;
- o Areas of habitat creation or enhancement which are significant in area relative to the size of the development;
- o Enhancements to habitat condition.

** In Kent, guidance indicates that the delivery of above 0.5 (total) relevant biodiversity units is considered the threshold for on-site significance for created or enhanced habitats.

*** Private gardens and container planting are not considered significant enhancements in national guidance and have not been included in the above table.

**** Cropland habitats (except arable field margins, and winter stubble where providing mitigation/compensation for wintering birds), Rhododendron scrub, introduced shrub and culverts cannot be considered significant enhancements in local guidance and have not been included in the above table.