



RSK Acoustics Ltd

Kimberly Clark Northfleet

Biodiversity Net Gain Design Stage Report

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RSK GENERAL NOTES

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EXECUTIVE SUMMARY

1. RSK Biocensus was appointed by RSK Acoustics Ltd, on behalf of Kimberly Clark, to present the results of a Biodiversity Net Gain (BNG) assessment for the proposed works at Northfleet Mill, located at Northfleet, Gravesend, DA11 9AD (site central grid reference TQ 62588 74366). The proposed works comprise the installation of new boilers and associated pipework/infrastructure. An existing site office building will also require demolition to facilitate the pipework installation.
2. The BNG assessment uses the results of a UK Habitat Classification (UKHab) survey undertaken at the site during February 2026, to determine the habitats present on site before construction and to provide each habitat with a biodiversity value using the Statutory Biodiversity Metric. The biodiversity value of each habitat present on site is then totalled to provide an overall biodiversity value of the site before construction.
3. Proposed habitat changes after construction, based on landscape plans provided by Paul Butler Associates (dated 31/03/2026), are also provided a biodiversity value using the Statutory Biodiversity Metric. The biodiversity value for each habitat that will be present on site after construction is totalled and then compared against the total biodiversity value of habitats present before construction to provide an indication of the net change in biodiversity value as a result of the Proposed Development.
4. The Statutory Biodiversity Metric measures biodiversity value of habitats in 'biodiversity units' and this BNG assessment follows the methods set out in Statutory Biodiversity Metric user guide. A habitat is assigned a biodiversity unit score by considering its area (or length), distinctiveness, condition and strategic significance.
5. The full biodiversity assessment calculation can be found in the accompanying Excel document *2489912-D03(00) Kimberly Clark Northfleet Statutory Metric*; however, screenshots of the main results tables are presented here in Appendix A, for convenience.
6. The condition assessments for all habitats present before construction are listed in Appendix B. This includes any deviation from standard guidance, assumptions and justifications for habitat classification and condition.
7. The site was found to comprise a total of five different habitats including other neutral grassland, other broadleaved woodland, mixed scrub, developed land; sealed surface, and an individual tree. This results in a baseline of 2.39 area habitat biodiversity units. No irreplaceable or very high distinctiveness habitats are present onsite.
8. Post-development plans include four retained habitats, totalling 1.76 area habitat biodiversity units. No hedgerows or watercourses are present on-site.
9. This BNG assessment thus concludes that the current proposed development will result in a net change of -0.63 area habitat biodiversity units. This equates to a -26.16% net loss in biodiversity. The trading rules in the Statutory Biodiversity Metric have not been met for all habitat types. This is because there are losses of medium distinctiveness area habitats that have not been offset by trading up via the provision of higher distinctiveness area habitats. Given the urbanised nature of the Application Site, opportunities for providing higher distinctness habitats are limited and would be unrealistic for this location.

10. To achieve a 10% gain, the Applicant intends to purchase biodiversity units from an offsite habitat bank. This will be confirmed as a condition of planning, subject to planning permission being granted.

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1.0 INTRODUCTION

1.1 Purpose of Document

- 1.1.1 RSK Biocensus was appointed by RSK Acoustics Ltd, on behalf of Kimberly Clark ('the Applicant') to present the results of a Biodiversity Net Gain (BNG) assessment for the proposed boiler installation ('the Proposed Development') at Kimberly Clark Northfleet ('the Application Site'). This report is being used to support a Full Planning application to Gravesham Borough Council.
- 1.1.2 The document provides:
- a detailed methodology, including assumptions, for undertaking the BNG assessment;
 - the baseline biodiversity value of habitats within the Application Site prior to construction;
 - the likely biodiversity value of habitats within the Application Site post-development based on the current design information; and
 - the relative biodiversity change of habitats within the Application Site after construction compared with before construction, determining whether the Proposed Development has achieved a 10% net gain in biodiversity.

1.2 Landscape Context

- 1.2.1 The Application Site is located within the administrative boundary of Gravesham Borough Council. The Application Site is situated at site central grid reference TQ 62588 74366. It is c. 0.4 hectares (ha) and comprises other neutral grassland, other broadleaved woodland, mixed scrub, developed land; sealed surface, and an individual tree (Figure 1).
- 1.2.2 The Application Site is bordered to the north by Crete Hall Road; to the south by a patch of grassland and industrial infrastructure; to the east by access roads and a car park; and to the west by a steep wooded bank leading up to Granby Road.
- 1.2.3 The Application Site is situated in a largely urban context with the surrounding land comprising mainly industrial sites to the north, south, east, and west, with a network of main roads/access tracks connecting them. Some isolated patches of grassland/woodland are present within the locale. The River Thames lies c. 300m north of the Site at its closest point, while Sawyer's Lake lies c. 540m south-east.

1.3 The Proposed Development

- 1.3.1 The Proposed Development consists of the installation of new boilers and associated pipework/infrastructure. An existing site office building will also require demolition to facilitate the pipework installation (Figure 2).

1.4 Policy context

- 1.4.1 The primary aims of the BNG process are for developments to secure a measurable improvement in habitat for biodiversity, to minimise biodiversity losses and to help to restore ecological networks whilst streamlining development processes. BNG does not replace other existing legislation and policy for nature conservation. The below legislation and policy provide the context behind the need to achieve BNG.

The Environment Act

- 1.4.2 The Environment Act 2021 mandates a statutory requirement for developments to deliver a minimum 10% BNG which became mandatory from 12th February 2024.

Town and Country Planning Act

- 1.4.3 Schedule 7A of the Town and Country Planning Act 1990 (as amended) mandates a statutory requirement for developments to deliver a minimum 10% BNG which became mandatory from 12th February 2024.

National Planning Policy Framework

- 1.4.4 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied by Local Authorities within their Local Development Frameworks (LDF). The revised National Planning Policy Framework was published December 2023 (Department for Levelling Up, Housing and Communities, 2023).
- 1.4.5 Chapter 15 of the NPPF 'Conserving and enhancing the natural environment' sets out the requirements to consider BNG in planning decisions. Paragraph 170 states: "*Planning policies and decisions should contribute to and enhance the natural and local environment by: ... d) minimising impacts and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*"

Local Plans

- 1.4.6 The Gravesham Local Plan Core Strategy (Adopted September 2014) contains Policies CS12: Green Infrastructure and CS19: Development and Design Principles which state:
- "There will be no net loss of biodiversity in the Borough, and opportunities to enhance, restore, re-create and maintain habitats will be sought, in particular within the Biodiversity Opportunity Areas shown on the Strategic Green Infrastructure Network map and within new development."*
- "New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise".*

2.0 METHODS

2.1 Overview

- 2.1.1 This BNG assessment has been carried out as a desk-based exercise and has been undertaken by a competent person in accordance with best practice¹ (HE10).
- 2.1.2 The results of UK Habitat Classification (UKHab) surveys carried out within the Application Site by RSK Biocensus in February 2026 have been used to determine the biodiversity value of habitats within the Application Site before construction (Figure 2).
- 2.1.3 The landscape plans provided by the Applicant for the Proposed Development have been used to determine the biodiversity value of habitats within the Application Site after construction (Figure 3).
- 2.1.4 The primary documents consulted as part of this assessment also include *2489912-D01(00) Kimberly Clark Northfleet Preliminary Ecological Appraisal Report* (RSK Biocensus, 2026).

2.2 Biodiversity Assessment Methods

- 2.2.1 This assessment was undertaken in line with guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM, 2021), the British Standard for Biodiversity Net Gain (BS 8683) (British Standard Institute, 2021) and industry best practice (CIEEM/CIRIA/IEMA, 2016).
- 2.2.2 To calculate the baseline values for the Application Site, and assess any changes arising from the Proposed Development, this study uses methods set out the Statutory Biodiversity Metric (hereafter 'the Metric') user guide (Defra, 2023). The Metric measures biodiversity value for habitats in 'biodiversity units' (BUs)².
- 2.2.3 The Metric is designed to quantify losses and gains of biodiversity as a result of proposed development or land management to inform and improve planning, design, land management and decision-making. The Metric uses habitats as a proxy to describe biodiversity.
- 2.2.4 The Metric can calculate biodiversity value of:
 - existing habitats;
 - habitat enhancement; and
 - habitat creation.
- 2.2.5 The Metric can calculate different types of BUs. There are three types of biodiversity units, which are calculated in three separate 'modules' of the Metric. These are:

¹ A competent person has the knowledge and skills to perform specified tasks to complete and review biodiversity metric calculations. This is obtained through training, qualifications, experience, or a combination of them. Competency is aligned with the British Standard '*Process for designing and implementing biodiversity net gain* (BS 8683:202)'.

² 'Biodiversity units' are used to describe relative biodiversity value. There are three types of biodiversity units: area habitat units, hedgerow units and watercourse units. Each of these are calculated in separate 'modules' of the biodiversity metric.

- area habitat units (e.g. woodland, grasslands, wetlands);
- hedgerow units (e.g. hedgerows and lines of trees); and
- watercourse units (e.g. culverts, canals, wet ditches, rivers and streams).

- 2.2.6 Consequently, a site can have three biodiversity unit values, which are assessed using the Metric, but which cannot be summed together or traded between.
- 2.2.7 The area or length of a habitat is multiplied by several factors in the Metric (called multipliers) that indicate its quality and value (distinctiveness, condition and strategic location), and this provides its BU value.
- 2.2.8 In addition, for those habitats that are to be created or enhanced, the risk of failure is accounted for by applying multipliers for risk factors (difficulty, time to target condition, and off-site risk).
- 2.2.9 A brief description of the different multipliers contained within the Metric are detailed below in Table 1.

Table 1 – Statutory Biodiversity Metric multipliers and their explanations

Biodiversity Metric multiplier	Explanation
Habitat distinctiveness	A measure based on the type of habitat and its distinguishing features. This includes: • consideration of species richness and rarity; • the extent to which the habitat is protected by designations; and • the degree to which a habitat supports species rarely found in other habitats.
Habitat condition	A measure of the habitat against its ecological optimum state. Condition is a way of measuring variation in the quality of patches of the same habitat type.
Strategic significance	Describes the local significance of the habitat based on its location and the habitat type.
Difficulty	A measure which represents the uncertainty in the effectiveness of management techniques used to enhance or create habitat.
Time to target condition	The average time taken between starting creation or enhancement of habitats and that habitat reaching its target condition or distinctiveness.
Spatial risk	Spatial risk represents the relationship between the location of biodiversity loss (on-site) and where the off-site habitat is being delivered. This is applied to off-site interventions only.
Riparian zone encroachment	A measure of any feature or intervention within the riparian zone that reduces the quantity, quality or ecological function of the riparian habitat.
Watercourse encroachment	A measure of any feature that adversely affects the natural function of the watercourse, or results in localised changes in habitat, species and migratory pathways.

2.3 BNG Good Practice Principles for Development

- 2.3.1 The Metric has been designed as a tool to help inform plans and decisions; however, when undertaking BNG assessments this must be undertaken in accordance with set

principles outlined in the user guide (Defra, 2023). These are outlined in Table 2 along with a full justification regarding how each principle has been considered.

Table 2 – Statutory Biodiversity Metric good practice principles and justification

Principle	Justification of how principle has been applied
Principle 1: The metric assessment should be completed by a competent person.	This assessment was completed by a suitably qualified person (HE10) with experience in completing Biodiversity Net Gain assessments of this level. It has been checked and reviewed by NH25, who is a Chartered Environmentalist, a full member of CIEEM and has over 20 years of experience working as an ecologist.
Principle 2: The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.	Existing levels of protection afforded to protected species and habitats are not changed by use of this or any other metric. Statutory obligations will still need to be satisfied. The PEA report ³ details the presence of protected and/or notable species, sites and habitats, and assesses potential impacts and outlines suitable mitigation measures to address these.
Principle 3: The biodiversity metric should be used in accordance with established good practice guidance and professional codes.	The mitigation hierarchy has been applied to the design of the Proposed Development. The area of permanent habitat loss has been kept to a minimum without comprising the development. The habitats that will be created and enhanced will be appropriate, and of the correct distinctiveness, to compensate for the habitats that will be impacted.
Principle 4: The biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.	RSK Biocensus acknowledges that the Statutory Biodiversity Metric has been kept deliberately simple to be of practical use. The calculations have been undertaken by specialists and input is underpinned by robust baseline evidence and ecological knowledge and experience.
Principle 5: Biodiversity units are a proxy for biodiversity and should be treated as relative values.	RSK Biocensus acknowledges that the Statutory Biodiversity Metric is tool to be used as a means of assessing changes in biodiversity value (losses or gains) brought about by the Proposed Development and is a habitat-based approach to determining a proxy biodiversity value within the Application Site and the output does not represent absolute values.
Principle 6: This biodiversity metric is designed to inform decisions in conjunction	Impacts to protected and notable species and habitats have been fully assessed as

³ RSK Biocensus (2026) 2489912-D01(00) Kimberly Clark Northfleet - Preliminary Ecological Appraisal Report

Principle	Justification of how principle has been applied
with locally relevant evidence, expert input, or guidance.	part of the PEA undertaken for the Proposed Development.
Principle 7: Habitat interventions need to be realistic and deliverable within a relevant project timeframe.	N/A – habitat interventions are not currently proposed as part of the Proposed Development.
Principle 8: Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.	N/A – created and enhanced habitats are not currently proposed as part of the Proposed Development.
Principle 9: The biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to: - maintain habitat extent - supporting more, bigger, better and more joined up ecological networks - ensure that proposed or retained habitat parcels are of sufficient size for ecological function	RSK Biocensus acknowledges that the Metric does not enforce a minimum habitat size ratio. Any retained habitats will be appropriate for the local environment, realistic and deliverable and aim to provide supporting functions for biodiversity.

2.4 Irreplaceable Habitats and Very High Distinctiveness Habitats

- 2.4.1 Irreplaceable habitats (as provided for in secondary legislation for BNG⁴) do not have a BNG requirement as they are too valuable to be compensated for. As such, any losses to irreplaceable habitats cannot be calculated by the biodiversity metric tool and they are removed from the baseline.
- 2.4.2 No Irreplaceable or very high distinctiveness habitats are present within the Site.

2.5 Assumptions and Limitations

- 2.5.1 In accordance with industry guidelines (CIEEM, 2019), unless the Application Site changes significantly, the desk study and surveys carried out to inform this report should remain valid for at least 18 months. After 18 months, an ecologist would need to reassess the Application Site to determine if the results remained valid. After three years, the report is unlikely to still be valid and most, if not all, of the surveys are likely to need to be updated (subject to an assessment by an ecologist).
- 2.5.2 Habitat areas have been digitised using aerial imagery and GIS data collected during the surveys. While all reasonable efforts have been made to map habitats accurately, slight discrepancies in area calculations may arise due to resolution limits or on-ground variability, particularly at habitat boundaries. For this assessment, and as per best practice, habitat areas have been rounded up or down where applicable to two decimal places.

⁴ <https://defra.landuse.blog.gov.uk/2023/10/05/irreplaceable-habitats-and-bng-what-you-need-to-know/>

- 2.5.3 As the survey was undertaken outside the optimal botanical survey period (April to October), less conspicuous plant species (including INNS) may have been missed. However, the survey was sufficient to make a broad assessment of the habitats present.
- 2.5.4 No hedgerows are present within the Application Site boundary. As such, no hedgerow assessments have been undertaken as part of this BNG report.
- 2.5.5 No rivers, streams, or other watercourses are present within the Application Site boundary. As such, no watercourse assessments have been undertaken as part of this BNG report.
- 2.5.6 This assessment is based on the current design and site location. If any of this is to change in the future, then a further BNG assessment may be required.



3.0 RESULTS

3.1 Overview

- 3.1.1 To calculate the overall biodiversity accounting position for the Proposed Development, the BU values for the existing habitats (pre-development) and any proposed newly created/enhanced habitats (post-development) need calculating.
- 3.1.2 The full results of this assessment are summarised in Appendix A, with the habitat condition sheets presented in Appendix B. The full Statutory Biodiversity Metric spreadsheet is presented separately in 2489912-D03(00) *Kimberly Clark Northfleet Statutory Metric*.

3.2 Pre-development

- 3.2.1 The Application Site comprises other neutral grassland, other broadleaved woodland, mixed scrub, developed land; sealed surface, and an individual tree. The UKHab Plan (Figure 2) has been used to determine all of the habitats present within the Application Site before construction.
- 3.2.2 Detailed habitat descriptions and the species present within each habitat can be found in the Kimberly Clark Northfleet Preliminary Ecological Appraisal Report⁵

Other neutral grassland

- 3.2.3 A 0.15ha area of regularly-mown grassland with *Erodium moschatum* (Musk Stork's-bill) cover. An additional 0.02ha section of grassland is present towards the north of the Site. Both were originally recorded as 'moderate' condition.
- 3.2.4 As the suboptimal date of the survey makes confirmation of grassland condition assessment difficult; a realistic 'worst case scenario' of 'good' condition for the grassland has been taken.

Other broadleaved woodland

- 3.2.5 A 0.008ha area of woodland consisting mainly of *Taxus baccata* (Yew) and *Acer pseudoplatanus* (Sycamore), with a ground covering of *Hedera helix* (Common Atlantic Ivy).

Mixed scrub

- 3.2.6 A 0.022ha area of mixed scrub in poor condition. A small (<0.01ha) section of this habitat had been cleared prior to the PEA survey. Classification was based on surrounding habitat and remaining pieces of vegetation.

⁵ RSK Biocensus (2026) 2489912-D01(00) Kimberly Clark Northfleet Preliminary Ecological Appraisal Report

Developed land; sealed surface

- 3.2.7 Three areas of developed land, totalling 0.208ha, comprising roads around the Site, a tarmac storage area, and paved areas hosting pipework/infrastructure.

Individual tree

- 3.2.8 A heavily pruned *Prunus* sp. (Cherry tree) located to the west side of the larger area of other neutral grassland.

Area habitats

- 3.2.9 The total area of each area habitat recorded within the Application Site before construction, the condition of each habitat (i.e. its current status) and a summary of the BUs this represents, are all presented in Table 3 below.

Table 3 – Baseline biodiversity unit values for each habitat recorded within the Application Site before construction

Habitat type (UKHab classification)	Baseline habitat condition	Area (ha)	Baseline biodiversity unit value (BU)
Other neutral grassland	Good	0.176	2.11
Other broadleaved woodland	Moderate	0.008	0.06
Mixed scrub	Poor	0.022	0.09
Developed land; sealed surface	N/A	0.208	0
Individual tree	Moderate	0.0163	0.13
Total	Area with individual trees	0.43	2.39
	Area without individual trees	0.41	2.26

- 3.2.10 The total area of each existing area habitat that will be lost, retained or enhanced within the Site and a summary of the BUs this represents, are all presented in Table 4 below.

Table 4 – Extent of baseline area habitats being lost, retained and enhanced within Application Site along with their associated biodiversity unit values

Habitat type	Baseline habitat condition	Area lost (ha)	Area retained (ha)	Area enhanced (ha)	Forecast biodiversity units (BU) lost	Forecast biodiversity units (BU) retained	Baseline biodiversity units (BU) enhanced
Other neutral grassland	Good	0.04	0.135	0	0.49	1.62	0

Habitat type	Baseline habitat condition	Area lost (ha)	Area retained (ha)	Area enhanced (ha)	Forecast biodiversity units (BU) lost	Forecast biodiversity units (BU) retained	Baseline biodiversity units (BU) enhanced
Other broadleaved woodland	Moderate	0	0.008	0	0	0.06	0
Mixed scrub	Poor	0.001	0.022	0	0.01	0.08	0
Developed land; sealed surface	N/A	0	0	0	0	0	0
Individual tree	Moderate	0.0163	0	0	0.13	0	0
Total		0.0564	0.165	0	0.63	1.77	0

3.3 Post-development

- 3.3.1 The proposed site plan provided by Paul Butler Associates (Figure 3) has been used to identify all the habitats that will be retained within the Application Site after construction. The Applicant intends to purchase habitat area BUs from a Habitat Bank to address the deficit in biodiversity value as a result of the Proposed Development and attain the required 10% BNG figure.

Area habitats

- 3.3.2 A breakdown of areas for each proposed area habitat created or enhanced post-development within Application Site and a summary of the BUs this represents are presented in Table 5.

Table 5 – Post-development area habitat biodiversity unit values within the Application Site based on the current design

Habitat type	Forecast habitat condition	Habitat intervention	Forecast area (ha)	Forecast biodiversity unit value (BU)
Developed land; sealed surface	N/A	Creation	0.0325	0.00
Total			0.0325	0.00

- 3.3.3 The post-development biodiversity accounting calculations for area habitats have been undertaken using the provided proposed site plan (Figure 3). In areas where pipework is proposed it has been assumed that the condition of the underlying habitats will remain unaffected, as all pipework will be either underground, or raised by at least 1.5m above the ground via stilts. All existing habitats will continue to be managed as they currently are and will therefore not be subject to any changes in habitat type or condition.

- 3.3.4 As per the landscape plan, the Applicant intends to create a small area of additional grassland adjacent to the proposed boiler house building, as well as a c. 83m mixed hedge to partially screen the proposed pipework. While these habitats are being created as part of the Proposed Development, the BNG gains associated with them are not accounted for in the metric, since they cannot be enshrined within a 30-year HMMP due to management restrictions within the Site as well as potential future development plans.

3.4 Change in Biodiversity Value

- 3.4.1 The habitat proposals as per the proposed site plan (Figure 3) are anticipated to result in a net decrease of area habitat BUs. This is summarised in Table 5.

Table 5 – Change in biodiversity units as a result of the Proposed Development

Post-development area habitat biodiversity units (BU)		Baseline area habitat area biodiversity units (BU)		Change in area habitat biodiversity units (BU)	Percentage change (%)
1.77	-	2.39	=	-0.63	-26.16

- 3.4.2 The change in biodiversity value for the Proposed Development, as set out in Table 5, indicates that post-development:
- there would be an decrease of **0.63** area habitat BUs which equates to a **-26.16%** net loss in area habitats. The trading rules associated with the Metric have not been met for area habitats as a result of the Proposed Development.

4.0 RECOMMENDATIONS

4.1 Overview

4.1.1 Given that it is not possible to achieve 10% BNG on-site, three options are usually available to achieve the overall BNG requirement:

- Offset biodiversity unit losses outside the red line boundary;
- Purchase biodiversity units from a habitat bank (ideally in the same Local Planning Authority or National Character Area); and/or
- Purchase statutory credits from the Government.

4.1.2 The Applicant has confirmed their intention to purchase off-site units from a habitat bank provider to address the BU deficit resulting from the Proposed Development. As a result, this is the only off-site solution that will be described in detail.

4.2 Purchase of BUs from a habitat bank

4.2.1 Biodiversity loss as a result of the Proposed Development and can be offset and a minimum 10% net gain in biodiversity can be achieved by purchasing the required biodiversity units from a habitat bank. Offsite offsetting is subject to a spatial multiplier which encourages offsetting to be delivered as close to the Application Site as possible.

4.2.2 Wherever possible, biodiversity units should be delivered within the same National Character Area (NCA) or Local Planning Authority (LPA) as the Proposed Development. If this is not possible, offsetting within the adjacent NCA or LPA is preferred.

4.2.3 A search for offsetting options found that there were no habitat banks currently operating within the NCA or the LPA.

4.2.4 The search found one habitat banks in the neighboring LPA (Sevenoaks) which is owned by Gaia⁶.

4.2.5 Details of units available to purchase at the time of writing are shown in Table 6 below.

Table 6. Units available from Gaia

Habitat type	Distinctiveness	Available units	Cost
Other neutral grassland	Medium	20.57	POA
Mixed scrub	Medium	0.72	POA

4.2.6 No other habitat banks in adjacent NCA or LPAs were identified through our search; however, new habitat banks are being added to the market regularly. This is a result of

⁶ Gaia, Purchase biodiversity units. Available online at: <https://marketplace.gaiacompany.io/hub/marketplace>. [Accessed 23092025].

biodiversity net gain only recently becoming mandatory and therefore habitat banks and the market for purchasing biodiversity units is still in its infancy.

- 4.2.7 Biodiversity Units UK⁷ have a small site portal which is designed to help applicants purchase fractional amounts of units, as is required for the Proposed Development. Their portal can be used to obtain a quote for fractional amounts of units.



⁷ Biodiversity Units UK. Available online at: <https://biodiversity-units.uk/smallsitebng>. [Accessed 23092025].

5.0 EVALUATION AND CONCLUSIONS

5.1 Biodiversity Net Gain

- 5.1.1 The Proposed Development will lead to the loss of a small area of mixed scrub, some other neutral grassland, and an individual tree. The proposed works have been designed to limit impacts to the on-site habitats where possible, such as raising the above-ground pipework to prevent losses of the grassland underneath. Most of the other neutral grassland and all of the other broadleaved woodland are to be retained.
- 5.1.2 Overall, the Proposed Development will result in a -26.16% net loss in area habitat BUs.
- 5.1.3 Not all of the trading rules associated with the Metric have been met for area habitats. This is because there are losses of medium distinctiveness habitats that have not been fully offset. Given the urbanised nature of the Application Site, small extent of the area concerned, and limitations around management options for on-site habitats, opportunities for providing higher distinctness habitats are limited and would be unrealistic for this location.
- 5.1.4 The Applicant has confirmed their intention to purchase off-site units from a habitat bank provider to address the BU deficit resulting from the Proposed Development.

REFERENCES

British Standard Institute (2021) *BS 8683: Process for designing and implementing biodiversity net gain – Specification* Available: <https://www.bsigroup.com/en-GB/our-services/events/webinars/2021/bs-8683-process-for-designing-and-implementing-biodiversity-net-gain/> [Accessed 01/04/2026].

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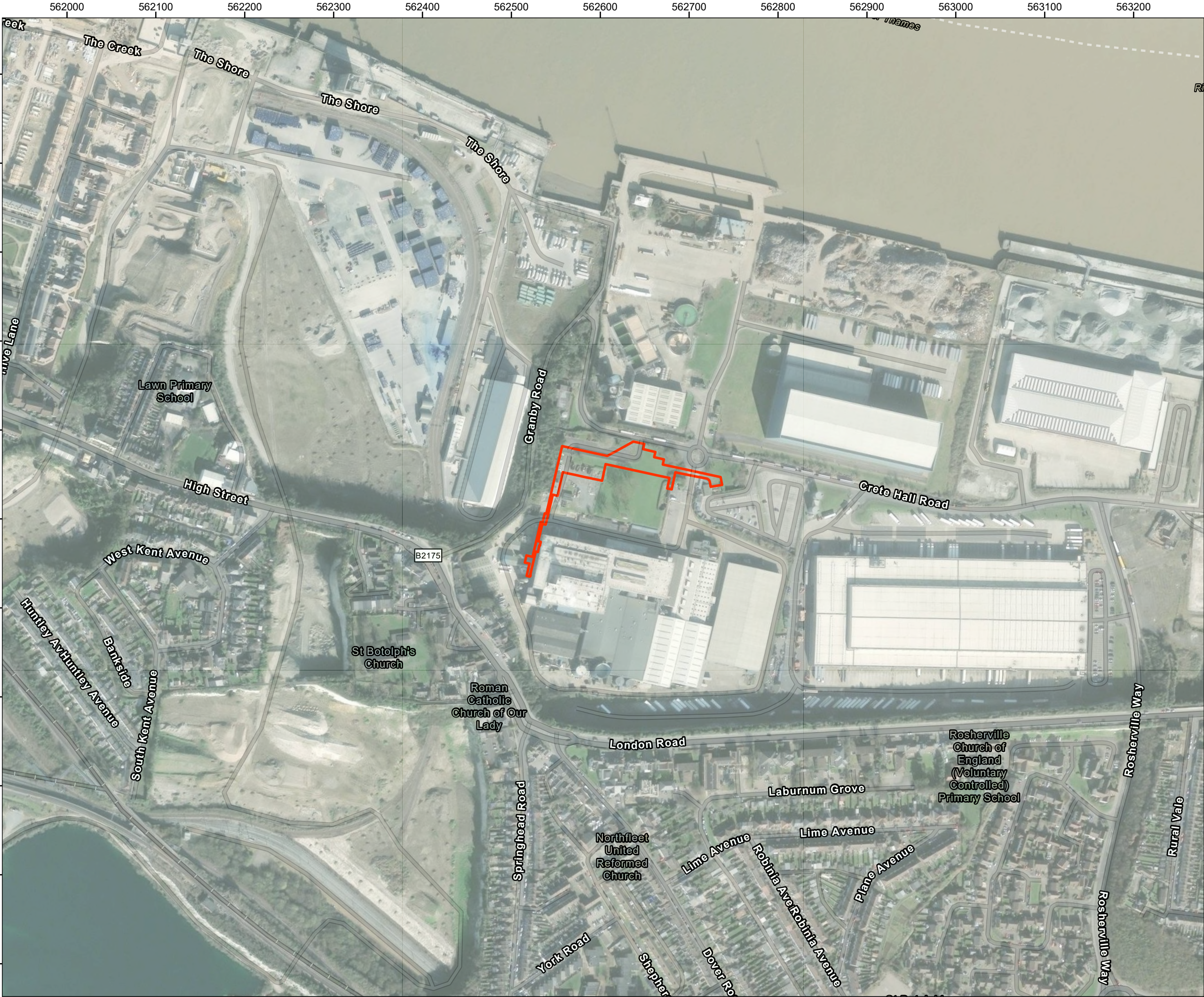
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FIGURES

Figure 1. Site location plan

Figure 2. Pre-development habitats plan

Figure 3. Proposed Site Plan



Legend:

Site boundary

00	09/04/2026	2489912	LB	RS	HE
Rev	Date	Project Code	Drn	Chk	App

PEA BNG Northfleet

RSK
biocensus
EXPERTS IN ECOLOGY

TITLE: Figure 1:
Site Location Plan

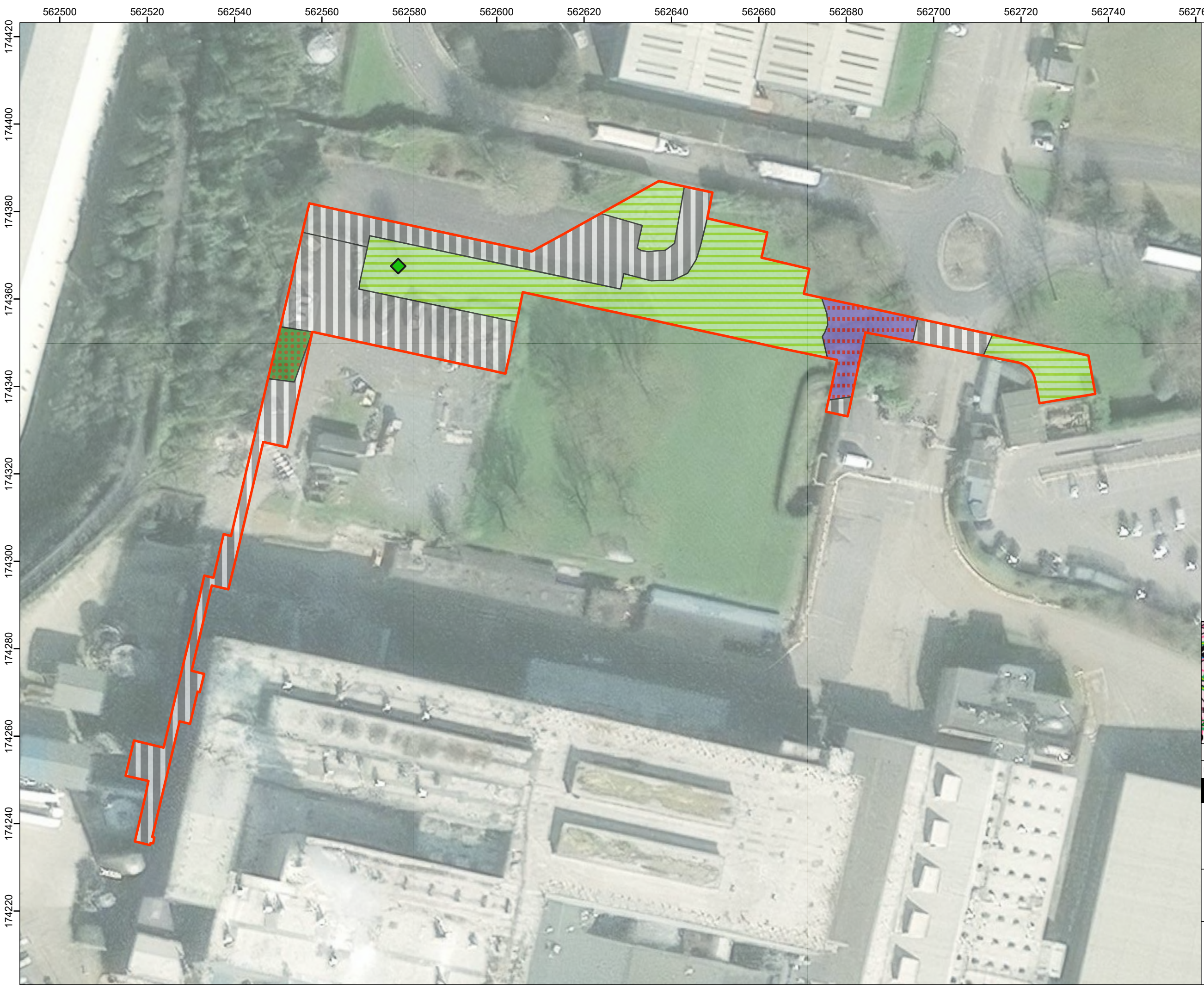
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Metres

SCALE: 1:4,000 @ A3

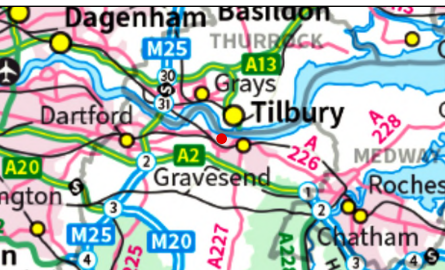
N
W
E
S

REV 00



Legend:

- Site boundary
- UKHab Classification
 - Other neutral grassland
 - Mixed scrub
 - Developed land; sealed surface
 - Other broadleaved woodland
 - Scattered tree



00	09/04/2026	2489912	LB	RS	HE
Rev	Date	Project Code	Drn	Chk	App

PEA BNG Northfleet



TITLE: Figure 2:
Pre-development Baseline Habitats

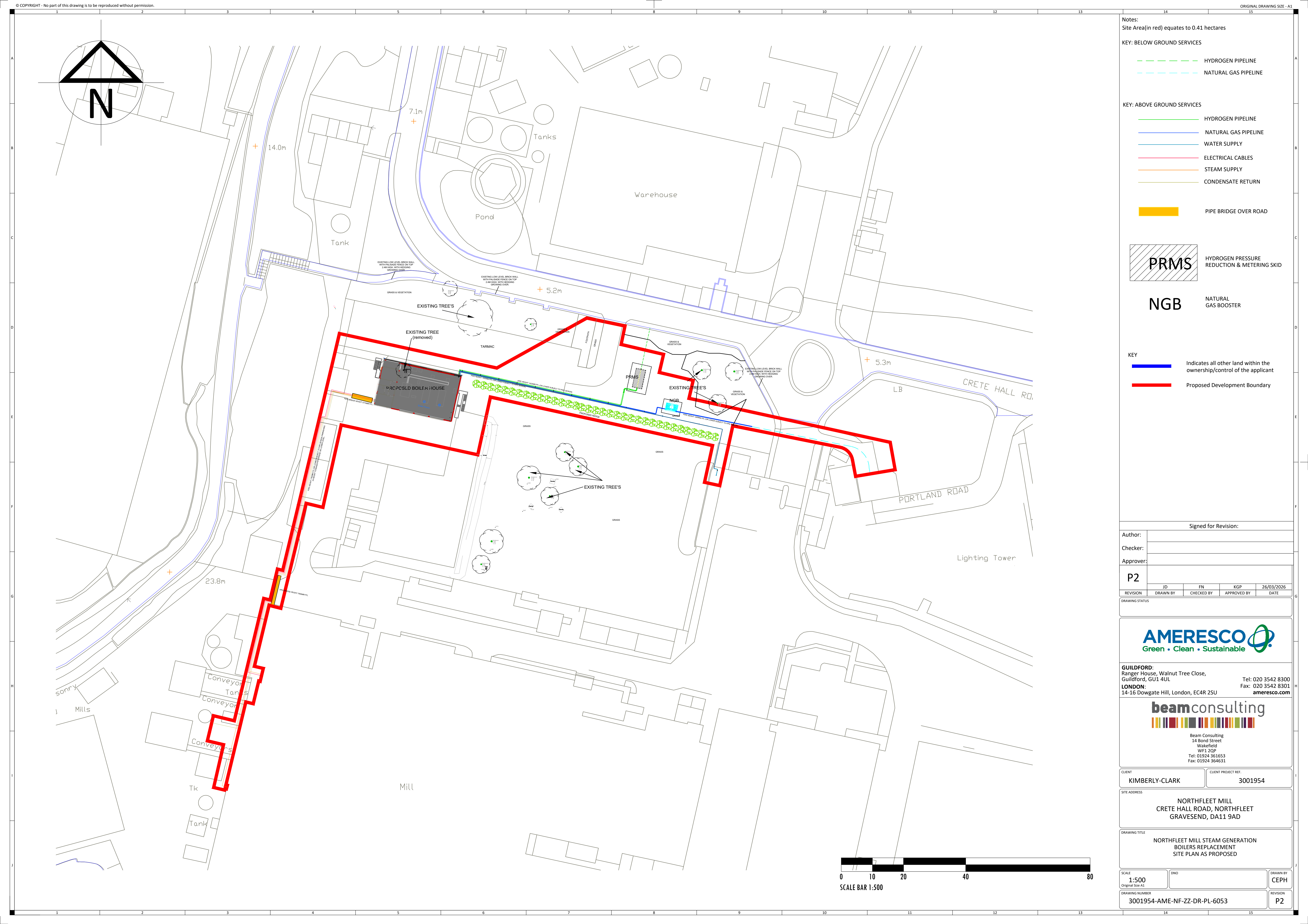
0102030

Metres

SCALE: 1:800 @ A3

N
W
E
S

REV 00



Notes:
Site Area(in red) equates to 0.41 hectares

KEY: BELOW GROUND SERVICES

- HYDROGEN PIPELINE
- NATURAL GAS PIPELINE

KEY: ABOVE GROUND SERVICES

- HYDROGEN PIPELINE
- NATURAL GAS PIPELINE
- WATER SUPPLY
- ELECTRICAL CABLES
- STEAM SUPPLY
- CONDENSATE RETURN

PIPE BRIDGE OVER ROAD

PRMS
HYDROGEN PRESSURE REDUCTION & METERING SKID

NGB
NATURAL GAS BOOSTER

KEY

- Indicates all other land within the ownership/control of the applicant
- Proposed Development Boundary

Signed for Revision:				
Author:				
Checker:				
Approver:				
P2				
REVISION	DRAWN BY	CHECKED BY	APPROVED BY	DATE
DRAWING STATUS				

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CLIENT	KIMBERLY-CLARK		CLIENT PROJECT REF.	3001954
SITE ADDRESS				
NORTHFLEET MILL CRETE HALL ROAD, NORTHFLEET GRAVESEND, DA11 9AD				
DRAWING TITLE				
NORTHFLEET MILL STEAM GENERATION BOILERS REPLACEMENT SITE PLAN AS PROPOSED				
SCALE	1:500	DNO	DRAWN BY	CEPH
Original Size A1		DRAWING NUMBER		
3001954-AME-NF-ZZ-DR-PL-6053		REVISION		
		P2		

A. Pre-construction calculations

21

B. Post development calculations

Area Habitats

Project Name: Map Reference:

A-2 On-Site Habitat Creation

Condense / Show Columns

Condense / Show Rows

Main Menu

Area habitat summary

Total Net Unit Change	-0.63
Total Net % Change	-26.16%
Trading Rules Satisfied	No - check trading summaries ▲
Area Check	Area Acceptable ✓

Ref	Broad Habitat	Proposed habitat	Area (hectares)	Distinctiveness		Condition		Strategic signi
				Distinctiveness	Score	Condition	Score	Strategic significance
1	Urban	Developed land; sealed surface	0.0325	V.Low	0	N/A - Other	0	Area/compensation not in local strategy/ no local strategy

Post intervention habitats

Strategic significance	Strategic significance multiplier	Standard time to target condition (years)	Habitat created in advance (years)	Delay in starting habitat creation (years)	Temporal multiplier			Difficulty multipliers				Habitat units delivered
					Standard or adjusted time to target condition	Final time to target condition (years)	Final time to target multiplier	Standard difficulty of creation	Applied difficulty multiplier	Final difficulty of creation	Difficulty multiplier applied	
Low Strategic Significance	1	0	0	0	Standard time to target condition applied	0	1.000	Low	Standard difficulty applied	Low	1	0.00

C. Summary Results

Headline Results Scroll down for final results ▲		Return to results menu	
On-site baseline	Habitat units	2.39	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	1.77	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units & percentage)	Habitat units	-0.63	-26.16%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
On-site net gain is less than target set ▲			
Off-site baseline	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	Habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-0.63	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	

FINAL RESULTS

Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-0.63
	<i>Hedgerow units</i>	0.00
	<i>Watercourse units</i>	0.00

Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	-26.16%
	<i>Hedgerow units</i>	0.00%
	<i>Watercourse units</i>	0.00%

Total net gain achieved is less than target set ▲

Trading rules satisfied?	No - Check Trading Summaries ▲
---------------------------------	--------------------------------

Unit Type	Target	Baseline Units	Units Required	Unit Deficit
<i>Habitat units</i>	10.00%	2.39	2.63	0.87
<i>Hedgerow units</i>	10.00%	0.00	0.00	0.00
<i>Watercourse units</i>	10.00%	0.00	0.00	0.00

No additional hedgerow units required to meet target ✓
 No additional watercourse units required to meet target ✓

Input errors/rule breaks present in metric ▲

APPENDIX B – PRE-DEVELOPMENT HABITAT CONDITION SURVEY RESULTS

Habitat condition survey results for Other neutral grassland (main section)

Source of condition assessment criteria: Technical Annex 1 – condition assessment sheet and methodology			
Date of survey			
04/02/2026			
Condition Assessment Criteria		Pass/fail	Justification
A	The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Pass	
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Fail	
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens ² .	Fail	
D	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Pass	
E	Combined cover of species indicative of suboptimal condition ³ and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species ⁴ (as listed on Schedule 9 of WCA ⁵) are present, this criterion is automatically failed.	Pass	
F	There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only	Pass	
Overall Condition Assessment			
Passes 4 criteria including criterion A – Moderate condition			
Photograph			



Habitat condition survey results for Other neutral grassland (northern section)

Source of condition assessment criteria:

Technical Annex 1 – condition assessment sheet and methodology

Date of survey

04/02/2026

Condition Assessment Criteria		Pass/fail	Justification
A	The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Pass	
B	Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	Pass	
C	Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens ² .	Pass	
D	Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	Pass	

E	Combined cover of species indicative of suboptimal condition³ and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species⁴ (as listed on Schedule 9 of WCA⁵) are present, this criterion is automatically failed.	Pass	
F	There are 10 or more vascular plant species per m² present, including forbs that are characteristic of the habitat type (species referenced in Footnote 3 and 5 cannot contribute towards this count). Note - this criterion is essential for achieving Good condition for non-acid grassland types only	Fail	

Overall Condition Assessment

Passes 5 criteria including criterion A – Moderate condition

Photograph



Habitat condition survey results for other broadleaved woodland

UKHAB classification		Woodland and forest – Other woodland; broadleaved				
Distinctiveness		Medium	Area / Length	0.016 ha		
Habitat Description						
A 0.016ha area of broadleaved woodland consisting mainly of <i>Taxus baccata</i> (Yew) and <i>Acer pseudoplatanus</i> (Sycamore), with a ground covering of <i>Hedera helix</i> (Common Atlantic Ivy).						
Condition Assessment Criteria						
Indicator		Good (3 points)	Moderate (2 point)	Poor (1 point)	Score per indicator	Notes (such as justification)
A	Age distribution of trees	Three age-classes ¹ present.	Two age-classes ¹ present.	One age-class ¹ present.	1	
B	Wild, domestic and feral herbivore damage	No significant browsing damage evident in woodland ² .	Evidence of significant browsing pressure is present in less than 40% of whole woodland ² .	Evidence of significant browsing pressure is present in 40% or more of whole woodland ² .	3	
C	Invasive plant species	No invasive species ³ present in woodland.	<i>Rhododendron Rhododendron ponticum</i> or cherry laurel <i>Prunus laurocerasus</i> not present, and other invasive species ³ <10% cover.	<i>Rhododendron</i> or cherry laurel present, or other invasive species ³ ≥ 10% cover.	3	
D	Number of native tree species	Five or more native tree or shrub species ⁴ found across woodland parcel.	Three to four native tree or shrub species ⁴ found across woodland parcel.	Two or less native tree or shrub species ⁴ across woodland parcel.	1	
E	Cover of native tree and shrub species	>80% of canopy trees and >80% of understory shrubs are native ⁵ .	50 - 80% of canopy trees and 50 - 80% of understory shrubs are native ⁵ .	<50% of canopy trees and <50% of understory shrubs are native ⁵ .	2	
F	Open space within woodland	10 - 20% of woodland has areas of temporary open space ⁶ . Unless woodland is <10ha, in which case 0 - 20% temporary open space is permitted ⁷ .	21 - 40% of woodland has areas of temporary open space ⁶ .	<10% or >40% of woodland has areas of temporary open space ⁶ . But if woodland <10ha has <10% temporary open space, please see Good category ⁷ .	3	
G	Woodland regeneration	All three classes present in woodland ⁸ ; trees 4 - 7 cm Diameter at Breast Height (DBH), saplings and seedlings or advanced coppice present ⁸ .	One or two classes only present in woodland ⁸ .	No classes or coppice regrowth present in woodland ⁸ .	2	
H	Tree health	Tree mortality 10% or less, no pests or diseases and no crown dieback ⁹ .	11% to 25% tree mortality and or crown dieback or low-risk pest or disease present ⁹ .	Greater than 25% tree mortality and or any high-risk pest or disease present ⁹ .	3	
I	Vegetation and ground flora	Recognisable NVC plant community ¹⁰ at ground layer present, strongly characterised by ancient woodland flora	Recognisable woodland NVC plant community ¹⁰ at ground layer present.	No recognisable woodland NVC plant community ¹⁰ at ground layer present.	1	
J	Woodland vertical structure	Three or more storeys across all survey plots, or a complex woodland ¹¹ .	Two storeys across all survey plots ¹¹ .	One or less storey across all survey plots ¹¹ .	2	

K	Veteran trees	Two or more veteran trees ¹² per hectare.	One veteran tree ¹² per hectare.	No veteran trees ¹² present in woodland.	1	
L	Amount of deadwood	50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, branch stubs and stumps, or an abundance of small cavities ¹³ .	Between 25% and 50% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities ¹³ .	Less than 25% of all survey plots within the woodland parcel have deadwood, such as standing and fallen deadwood, large dead branches and or stems, stubs and stumps, or an abundance of small cavities ¹³ .	1	
M	Woodland disturbance	No nutrient enrichment or damaged ground evident ¹⁴ .	Less than 1 hectare in total of nutrient enrichment across woodland area, and or less than 20% of woodland area has damaged ground ¹⁴ .	1 hectare or more of nutrient enrichment, and or 20% or more of woodland area has damaged ground ¹⁴ .	3	
Total Score (out of a possible 39)						26
Condition Assessment Result				Condition Assessment Score		Result Achieved
Total score >32 (33 to 39)				Good (3)		Moderate condition
Total score 26 to 32				Moderate (2)		
Total score <26 (13 to 25)				Poor (1)		
Condition Assessment Results				Condition Assessment Score		
Total score >32 (33 to 39)				Good (3)		
Total score 26 to 32				Moderate (2)		
Total score <26 (13 to 25)				Poor (1)		
Photograph						
						

Habitat condition survey results for individual tree (*Prunus sp.*)

Source of condition assessment criteria: Technical Annex 1 – condition assessment sheet and methodology			
Date of survey			
04/02/2026			
Condition Assessment Criteria		Pass/fail	Justification
A	The tree is a native species (or at least 70% within the block are native species).	Pass	
B	The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).	Pass	
C	. The tree is mature (or more than 50% within the block are mature) ¹ .	Fail	
D	There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.	Fail	
E	Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.	Pass	
F	More than 20% of the tree canopy area is oversailing vegetation beneath.	Fail	
Overall Condition Assessment			
Passes 3 criteria – Moderate condition			
Photograph			
			

Habitat condition survey results for mixed scrub

Source of condition assessment criteria: Technical Annex 1 – condition assessment sheet and methodology			
Date of survey			
04/02/2026			
Condition Assessment Criteria		Pass/fail	Justification
A	The parcel represents a good example of its habitat type - the appearance and composition of the vegetation closely matches its UKHab description (where in its natural range). - At least 80% of scrub is native, - There are at least three native woody species, - No single species comprises more than 75% of the cover (except hazel <i>Corylus avellana</i> , common juniper <i>Juniperus communis</i> , sea buckthorn <i>Hippophae rhamnoides</i> or box <i>Buxus sempervirens</i> , which can be up to 100% cover).	Fail	
B	Seedlings, saplings, young shrubs and mature (or ancient or veteran) shrubs are all present.	Fail	
C	There is an absence of invasive non-native plant species ⁴ (as listed on Schedule 9 of WCA5) and species indicative of suboptimal condition ⁶ make up less than 5% of ground cover.	Fail	
D	The scrub has a well-developed edge with scattered scrub and tall grassland and or forbs present between the scrub and adjacent habitat.	Fail	
E	There are clearings, glades or rides present within the scrub, providing sheltered edges.	Pass	
Overall Condition Assessment			
Passes 1 criteria – Poor condition			
Photograph			
			

Condition Assessment Results	Condition Assessment Score
Total score >32 (33 to 39)	Good (3)
Total score 26 to 32	Moderate (2)
Total score <26 (13 to 25)	Poor (1)



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