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10th April 2025

Port of London Authority Response (DC 423) Plan ref 20250251 Construction and operation of a 15MW Green Hydrogen Electrolyser and associated infrastructure.

Dear Lisa

Thank you for consulting the Port of London Authority (PLA) on the application in relation to the construction of a Green Hydrogen Electrolyser and associated infrastructure at Kimberly-Clark Northfleet Mill. We have now had the opportunity to review the submitted application and have the following comments to make.

Firstly, the Preliminary Ecological Appraisal (PEA) states that the applicant will be delivering Biodiversity Net Gain (BNG) as part of the project; however, insufficient detail as to how this will be delivered has been submitted and we request that the PEA is updated accordingly. Any proposals for BNG relating to River Thames, or any potential new or amended use of the river for extraction or outfall will require a River Works Licence with the PLA and the PLA's Statutory Consents and Compliance team should be contacted at lic.app@pla.co.uk to discuss further. We note that the Planning Statement refers to a Flood Risk Assessment; however, this document does not appear to be available to view within the submitted documents online. As the site is within Flood Zone 2, with potential to contain areas of Flood zone 3, impacts of the proposed construction and the longer term operation of the Hydrogen Electrolyser on ground water must be clearly outlined.

Our prior comments on the previous application (20230906) also referred to the proximity of the site to safeguarded wharves, as outlined in the Gravesham Local Plan Core Strategy and Policies Map (Map 1). The proposal must consider Policies CS07 Economy, Employment and Skills and Policy CS11 Transport of the Local Plan, in the context of supporting the continued use of the River Thames for commercial and passenger transport, whilst safeguarding and maximising the use of the existing commercial wharves. Although noted in the Transport Statement that deliveries of large components via the River Thames will be considered, further details of this should be reflected in associated Construction Logistics Plans (CLP) and/or Construction Environment Management Plans (CEMP). The Planning Design and Access Statement does not consider Policy DM8 (Safeguarding

Minerals Management, Transportation Production & Waste Management Facilities) of the Kent Minerals and Waste Local Plan.

I hope these comments are of assistance.

Yours sincerely

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Maeliosa Hardy

Planning Consultant