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21 September 2023

Port of London Authority Response (DC 423) Plan ref 20230909 Request for Screening Opinion in relation to land at Kimberly-Clark Northfleet Mill – Construction of a Green Hydrogen Electrolyser and associated infrastructure.

Dear Lisa

Thank you for consulting the Port of London Authority (PLA) on the Screening Opinion 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 report and have the following comments to make.

As the PLA is interested in the health of the river, including water quality and the riverbed, we note that there is a lack of detail on the potential use of the river for extraction or outfall. Any new or amended outfall into or from the River Thames 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.

The proposed development is in a ground water source protection zone, therefore the PLA would like to see further assessment to consider impacts of the proposed construction and the longer term operation of the Hydrogen Electrolyser on ground water.

As shown in the Gravesham Local Plan Core Strategy and Policies Map (Map 1), the site (sub-area 1.7) is located in close proximity to safeguarded wharves. The proposal must consider Policies CS07 Economy, Employment and Skills and Policy CS11 Transport of the Local Plan, to support the continued use of the River Thames for commercial and passenger transport, whilst safeguarding and maximising the use of the existing commercial wharves. Details should be reflected in associated Construction Logistics Plans (CLP) and/or Construction Environment Management Plans (CEMP). Consideration should also be given to Policy DM8 (Safeguarding Minerals Management, Transportation Production & Waste Management Facilities) of the Kent Minerals and Waste Local Plan.

As noted in the response from the Biodiversity Officer from the Kent CC Ecological Advice Service (KCC EAS), there is insufficient information to conclude that the proposals will not have a significant effect on biodiversity. This is also the case for other environmental factors such as air and water quality. The PLA are in agreement with the conclusions of the KCC EAS, that it is not possible to

rule out significant effects on the environment from the proposals. Any future planning application should consider the environmental effects of the proposals, regardless of the need for an EIA.

I hope these comments are of assistance.

Yours sincerely



Planning Consultant