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18 May 2026

Port of London Authority Response (DC 423) Plan ref 20260415 Kimberly Clark Ltd Northfleet Mill Crete Hall Road Northfleet Gravesend Kent DA11 9AD

Dear Lisa

Thank you for consulting the Port of London Authority (PLA) on the application in relation to the construction of a new boiler house with associated infrastructure / pipework and related works.

We note that the majority of the application site is located within Flood Zone 2 therefore Impacts of the proposed construction on ground water and surface water flooding must be considered to ensure there are no negative impacts on the river. We support the condition and informatives requested by the Environment Agency

We note in the Flood Risk Assessment (FRA) that the site will discharge to the River Thames via the existing drainage system (paragraph 7.3.1). 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 must be contacted at lic.app@pla.co.uk to discuss further.

The proposal must consider Policy CS11 Transport of the Local Plan and the emerging Local Plan Policy LP19 Sustainable Transport and Decarbonisation, in the context of supporting the continued use of the River Thames for commercial transport, whilst safeguarding and maximising the use of the existing commercial wharves. There is no Construction and Logistics Plan for the application. Water transport is recognised as one of the most sustainable modes for freight movement and therefore due consideration should be given to help displace HGV movements from the local highway where possible, to reduce the carbon footprint and maximise the use of the river. Further detail must be provided on the use of the river within the supply chain for the movement of construction materials and waste where appropriate.

Finally, it is noted that not all the biodiversity lost as a result of the development can be replaced onsite and it is the intention to purchase Biodiversity Units as a means of meeting the full compensatory requirement. The PLA's [Thames Vision 2050](#) has an aspiration to improve the

habitats and the estuarine environment of the Thames and would be willing to work with Kimberly Clark to achieve this goal

I hope these comments are of assistance.

Yours sincerely

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Ngaire Thomson

Planning Consultant