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12 October 2023

Port of London Authority Response (DC 423) Plan ref 20230906 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.

Further to the previous comments made on the Screening Opinion in relation to this application (Ref 20230909), the PLA are not satisfied that a number of the issues have been suitably addressed. The Preliminary Ecological Appraisal states that the applicant will be delivering Biodiversity Net Gain (BNG) as part of the project. However, no detail as to how this will be delivered have been submitted. The distance between any works and the top of the riverbank isn't clear from the information submitted, so if any works involve the riparian zone (such as works to the river wall etc.), the applicant will need to provide a 10% net gain in river units under the principles of BNG. The biodiversity metric and report that sets out how the principles of BNG have been applied have not been submitted and therefore it is not possible to comment in any further detail.

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 from the Flood Risk Assessment that the applicant is aware that the proposed development is in a ground water source protection zone, and that they intend to provide extra precautions to ensure the quality of the water discharged to the ground. However, the detail on this has not been provided to duly consider impacts of the proposed construction and the longer term operation of the Hydrogen Electrolyser on ground water.

Our prior comments on the Screening Opinion, 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 and equipment will be implemented via the wharves where feasible, 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