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9th June 2025

Port of London Authority Response (DC 423) Plan ref 20250406 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 development of a pulp laydown area and associated infrastructure at Kimberly-Clark Northfleet Mill. We have now had the opportunity to review the application and have the following comments to make.

We note that the application site is located predominately within Flood Zone 2 and partially within Flood Zone 3 along the northern boundary. 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. To reiterate comments made by the Environment Agency (EA), a preliminary risk assessment would be required for any breaking ground and this may lead to further investigation should contamination be discovered. Any facilities for the storage of oils, fuels or chemicals should also be contained to ensure that there is no risk for contamination; therefore, details of any necessary impermeable containment should be provided.

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, 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. The Transport Statement does not refer to the use of the River Thames. 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, there has been no reference to the provision of additional lighting around the site. The Preliminary Ecological Appraisal (PEA) has highlighted the impacts of artificial lighting on foraging and commuting behaviour of nocturnal mammals and it is recommended that any proposed new external lighting should be directed to where it is needed and light spillage (whether direct and/or indirect) should be avoided as far as practicable (paragraph 6.4.1). Full details of any external lighting to be erected within the application site both during the construction phase and any subsequent permanent external lighting, must therefore be provided.

I hope these comments are of assistance.

Yours sincerely

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Maeliosa Hardy

Planning Consultant