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15/11/2023

For the Attention of: **Sarah Norris**

Dear Sarah

### **Cory Decarbonisation Project - EN010128 - Early Adopters Programme Feedback**

Thank you for the invitation to provide comments on the Early Adopters Programme ('EAP'). Please find below our thoughts and experiences with the EAP to date. The feedback is divided into the relevant EAP components undertaken with the Cory Decarbonisation Project.

The Applicant is currently drafting four components for the EAP. These include the following:

- Component 3 - Issues Tracker
- Component 5 - Policy Compliance Document ('PCD')
- Component 7 - Design Approach Document ('DAD')
- Component 8 - Outline Code of Construction Practice

Components 3, 5 and 8 closely resemble documentation produced as part of all existing Development Consent Order submissions. We therefore feel this has had a minimal impact on the volume of project outputs but has required the Applicant and its supporting team to reprogramme accordingly.

The Applicant would like to seek greater guidance from the Inspectorate on the following matters:

#### Component 3 – Issues Tracker

The Applicant would like additional clarification with regard to how the issues tracker and subsequent 'Potential main issues for the Examination' ('PMIE') will interact and be programmed with the potential use of Statements of Common Ground ('SoCG') and Principal Areas of Disagreement Statements ('PADS'). The SoCG and PADS will possess similar information on history



of issue resolution. Clarification on the level of information to be presented and any other key difference(s) between the SoCG, PADS and PMIE would be greatly appreciated.

#### Component 7 - Design Approach Document ('DAD')

During our last meeting (26<sup>th</sup> September) the Inspectorate appeared content with our emerging approach and the process of interaction of the following: design proposals, design process and design commitments, environmental context and consultation. The Applicant would like to define the ambition or overall direction for the DAD and the status of information. At present the project's design team are working to the document framework previously outlined and assumed requirements and ambitions of the Inspectorate.

#### Component 8 – Outline Code of Construction Practice

The Applicant recognises the importance of this document and will continue to draft the Outline Code of Construction Practice (OCoCP) to be ready for submission with the DCO application. The OCoCP is a key delivery mechanism for identified mitigation in the Environmental Statement and design process. It is likely that the the OCoCP will be subject to change throughout the pre-application period. Whilst we would be content to share the evolving document with the you, detailed scrutiny of it may be counterproductive to efficient use of the Inspectorate's resources until it is finalised.

#### Programme

The Applicant is happy with the current regularity of the meetings held with the Case Manager. These meetings are currently taking place approximately every two months.

With regards to programme implications, the Applicant appreciates the EAP is currently in a trial stage and the Cory Decarbonisation Project is contributing to the Programme's development. We would like to understand the ways in which the Inspectorate believes the EAP will ultimately aid Stages 2-4 (Pre-application, Acceptance and Examination), not least to consider how we might best inform their development. The Applicant is conscious the significant amounts of environmental assessment and consultation with key statutory undertakers runs parallel the product of the EAP components. We have found this results in holding text being placed in some documents. This information would not be available until near submission, similar to the current DCO process and thus may provide limited benefit in some elements of the EAP.

The Applicant looks forward to continuing our work with the Inspectorate to develop the EAP in the future.

Yours faithfully

Richard Wilkinson  
Cory – Project Director