



COVER LETTER: 1.1

DECARBONISATION

Cory Decarbonisation Project

PINS Reference: EN010128

March 2024

Revision A

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20th March 2024

**The Planning Act 2008 – section 37 ‘Applications for orders granting development consent’
EN010128: Cory Decarbonisation Project (‘the Proposed Scheme’)**

Dear Sarah Norris,

1. Please find enclosed an application (‘the Application’) submitted by Cory Environmental Holdings Limited (hereafter referred to as ‘the Applicant’ or ‘Cory’) for a Development Consent Order (DCO) under section 37 of the Planning Act 2008 (‘PA 2008’) for the Cory Decarbonisation Project (‘the Proposed Scheme’).
2. The Applicant is part of the Cory Group, one of the UK’s leading resource management companies, with an extensive river logistics network in London. Cory has invested heavily in London’s waste recycling, energy generation and river logistics infrastructure.
3. The core activity of Cory involves recovering energy from residual waste, which is undertaken at their Riverside Campus, located adjacent to the River Thames at Belvedere in the London Borough of Bexley (LBB). Riverside 1 is an existing energy from waste (EfW) facility generating up to 80.5 megawatt (MW) electricity and has been operational since 2011. Riverside 2, an EfW facility with a generating capacity of approximately 76 MW, is currently under construction and anticipated to be operational in 2026. The two facilities combined represent 98% of the Applicant’s total carbon footprint; hence the need to extend the Riverside Campus to incorporate carbon capture.
4. The Applicant is seeking development consent for the proposed construction, operation, maintenance and decommissioning of the Proposed Scheme, incorporating the following main components: a Carbon Capture Facility, comprising up to two plants; a proposed new Jetty, extending into the Thames to facilitate the onward transfer of the captured CO₂; the Mitigation

and Enhancement Area, designed both to enhance biodiversity and to improve public access to outdoor space; three temporary construction compounds; and connections to utilities and provision of site access works.

5. The Proposed Scheme was designated a project of national significance for which development consent is required by a Direction given by the Secretary of State under sections 35(1) and 35ZA of the PA 2008 on 6 October 2022. By letter dated 28th February 2024, the Secretary of State confirmed that the reasoning set out in the Section 35 Direction and its Annex continues to apply to the Carbon Capture and Storage Project.
6. The Application is submitted to the Secretary of State ('the SoS') for Energy Security and Net Zero ('DESNZ'). Terms defined in the **Glossary (Document Reference 1.7)** shall have the same meanings in this letter, unless expressly given a different meaning.

7. Application fee and documentation

- a. A BACS transfer of £8,244.00 has been made to the account of the Planning Inspectorate on 14/03/2024. The payment reference number is pending issue from the Planning Inspectorate (PINS) but PINS confirmed in an email dated 19 March that payment had been received for EN010128: Cory Decarbonisation Project.
- b. Accompanying this **Cover Letter (Document Reference 1.1)** and forming part of the Application is the **Application Form (Document Reference 1.2)**. The **Application Guide (Document Reference 1.3)**, **Application Document Tracker (Document Reference 1.4)** and **Electronic Application Index (Document Reference 1.5)** have been provided to assist in navigation of the Application. The **Application Document Tracker (Document Reference 1.4)** is a live document, setting out the status and revision number of the documents submitted by the Applicant, which will be updated as required throughout the examination period of the application. The **Electronic Index (Document Reference 1.5)** provides a list of all application documents, including electronic file names, plain English descriptions, and document reference numbers. The **Section 55 checklist (Document Reference 1.6)** sets out how the Application complies with the requirements in section 55 of the PA 2008. The final document within Volume 1 (Category 1 Document) which is intended to support the assessment of the Application is the **Glossary (Document Reference 1.7)**.

8. Application formalities

- a. This Application is made in the form required by section 37(3)(b) of the PA 2008 and the application documents comply with the requirements in section 37 of the PA 2008 and those set out in:
 - The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 ('the APFP Regulations 2009');
 - The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 ('the EIA Regulations 2017');
 - The Department for Communities and Local Government's 'Planning Act 2008: application form guidance' (June 2013); and
 - The Planning Inspectorate's 'Advice Note Six: Preparation and submission of application documents' (Version 11).

- b. The Applicant agrees that the Planning Inspectorate publishes the application for development consent order with all associated documentation on the National Infrastructure pages of the Planning Inspectorate website as soon as practicable after submission.

9. The Proposed Scheme

- a. The Proposed Scheme will be located at Norman Road, Belvedere in the London Borough of Bexley (LBB) (National Grid Reference/NGR 549572, 180512). The following figures are available in the Environmental Statement:
 - **Figure 1-1: Site Boundary Location Plan of the ES (Volume 2) (Document Reference 6.2); and**
 - **Figure 1-2: Satellite Imagery of the Site Boundary Plan of the ES (Volume 2) (Document Reference 6.2).**
- b. The Applicant intends to construct, operate, maintain and decommission the Proposed Scheme to be linked with the River Thames. It comprises of the following key components, which are described below, and further detail is provided within **Chapter 2: Site and Proposed Scheme Description (Volume 1) of the ES (Document Reference 6.1)**:
 - The Carbon Capture Facility (including its associated Supporting Plant and Ancillary Infrastructure): the construction of infrastructure to capture a minimum of 95% of carbon dioxide (CO₂) emissions from Riverside 1 and 95% of CO₂ emissions from Riverside 2 once operational, which is equivalent to approximately 1.3Mt CO₂ per year. The Carbon Capture Facility will be one of the largest carbon capture projects in the UK.
 - The Proposed Jetty: a new and dedicated export structure within the River Thames as required to export the CO₂ captured as part of the Carbon Capture Facility.
 - The Mitigation and Enhancement Area: land identified as part of the **Outline Landscape, Biodiversity, Access and Recreation Delivery Strategy (Outline LaBARDS) (Document Reference 7.9)** to provide improved access to open land, habitat mitigation, compensation and enhancement (including forming part of the drainage system and Biodiversity Net Gain delivery proposed for the Proposed Scheme) and planting. The Mitigation and Enhancement Area provides the opportunity to improve access to outdoor space and to extend the area managed as the Crossness Local Nature Reserve (LNR).
 - Temporary Construction Compounds: areas to be used during the construction phases for activities including, but not limited to office space, warehouses, workshops, open air storage and car parking, as shown on the **Works Plans (Document Reference 2.3)**. These include the core Temporary Construction Compound, the western Temporary Construction Compound and the Proposed Jetty Temporary Construction Compound.
 - Utilities Connections and Site Access Works: The undergrounding of utilities required for the Proposed Scheme in Norman Road and the creation of new, or the improvement of existing, access points to the Carbon Capture Facility from Norman Road.
- c. Together, the Carbon Capture Facility, a new Jetty, the Mitigation and Enhancement Area, the Temporary Construction Compounds and the Utilities Connections and Site and Access Works are referred to as the 'Proposed Scheme'. The land upon which the Proposed Scheme is to be located is referred to as the 'Site' and the edge of this land referred to as

the 'Site Boundary'. The Site Boundary represents the Order Limits for the Proposed Scheme as shown on the **Works Plans (Document Reference 2.3)**.

- d. A more detailed description of the elements of the Carbon Capture Facility is provided in **Chapter 2: Site and Proposed Scheme Description of the ES (Volume 1) (Document Reference 6.1.2)**.
- e. The Application is accompanied by **Plans (Document Reference 2.1 – 2.12)** and **Environmental Statement Volume 2 Figures (Document Reference 6.2)** which comply with Regulation 5(3) of the APFP Regulations 2009 and are no larger than A0 size, are drawn to an identified scale (not smaller than 1:2500) and, in the case of plans, indicate the direction of north.

10. Environmental Impact Assessment

- a. The Proposed Scheme represents development that requires an Environmental Impact Assessment (EIA) to be carried out. Consequently, the Application includes an **Environmental Statement (ES) (Document Reference 6.1 to 6.4)** that reports the findings of the EIA undertaken. The EIA has been carried out, and the ES prepared, in accordance with the EIA Regulations 2017.
- b. The ES comprises the following documents, which form part of the Application:
 - **ES - Volume 1 - Main Text (Document Reference 6.1)**
 - **ES - Volume 2 - Figures (Document Reference 6.2)**
 - **ES - Volume 3 - Appendices (Document Reference 6.3)**
 - **ES - Volume 4 - Non-Technical Summary (Document Reference 6.4)**

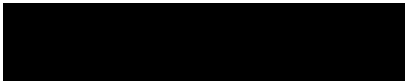
11. Application Submission and Support

- a. The Application is accompanied with **Site Boundary Location Plan (Document Reference 2.1)** which shows the location and extent of the Order Limits for the Proposed Scheme in the context of the local area. The **Land Plans (Document Reference 2.2)** show the extent of the land (the Order Limits) over which powers of compulsory acquisition are required for the Proposed Scheme, while the **Works Plans (Document Reference 2.3)** show the Order Limits and identify the location of the main components of the Proposed Scheme within the Site by reference to the Work Numbers set out in Schedule 1 of the **Draft DCO (Document Reference 3.1)**. **Access and Rights of Way Plans** are provided in **(Document Reference 2.4)**. **Indicative Plans and Elevations** are provided in **(Document Reference 2.5)**.
- b. Schedule 1 (Authorised Development) of the **Draft DCO (Document Reference 3.1)** provides the formal description of the Proposed Scheme and components and identifies the individual Work Numbers for those components. A detailed description of the Proposed Scheme is provided in **Chapter 2: Site and Proposed Scheme Description of the ES (Volume 1) (Document Reference 6.1.2)**.
- c. Schedule 2 (Requirements) of the **Draft DCO (Document Reference 3.1)** contains a number of requirements that would control the detailed design of the Proposed Scheme, in addition to its construction and operation, to ensure that it remains within the scope of the EIA carried out and does not result in unacceptable impacts. These would require the submission to, and approval by, the local planning authority of further details of the Proposed Scheme.

- d. Schedule 18 (Design Parameters) of the **Draft DCO (Document Reference 3.1)** provides maximum parameters for different aspects of the Proposed Scheme consistent with the details provided in Schedule 1 of the Draft DCO and as assessed in the EIA.
- e. The Draft DCO provides for powers of compulsory acquisition of interests and rights in land (including new rights) within the Order Limits. The provisions relating to compulsory acquisition are set out at Articles 18 to 31 of the **Draft DCO (Document Reference 3.1)**. These and other provisions of the Draft DCO are explained in the **Explanatory Memorandum (Document Reference 3.3)**.
- f. Provisions relating to compulsory acquisition are explained in the **Explanatory Memorandum (Document Reference 3.3)**. The Explanatory Memorandum also explains the purpose and effect of each article and schedule of the Draft DCO, as required by Regulation 5(2)(c) of the APFP Regulations 2009. It justifies the inclusion of relevant articles and requirements, including setting out the legal powers which enables the SoS to include certain provisions. It has been prepared with regard to PINS Advice Note 13 (2019).
- g. Any requirements for compulsory acquisition are justified within the **Statement of Reasons (Document Reference 4.1)**. The Statement of Reasons explains that there is a case of public interest which would justify the Applicant's exercise of powers of compulsory acquisition to permanently acquire land and rights, to extinguish rights, and to use land temporarily to enable the Applicant to construct, operate, maintain and decommission the Proposed Scheme. This should be considered in conjunction with the **Funding Statement (Document Reference 4.2)** which explains how the Proposed Scheme will be funded, including the funding of any compensation payable in relation to the granting or exercise of powers of compulsory acquisition. These are submitted in compliance with Regulation 5(2)(h) of the APFP Regulations 2009.
- h. A **Book of Reference (Document Reference 4.3)** has been prepared in support of the Application in compliance with Regulation 5(2)(d) of the APFP Regulations 2009. It corresponds with the **Land Plans (Document Reference 2.2)**.
- i. The Applicant has extensively consulted throughout the pre-application stage of the Proposed Scheme. This has included a non-statutory consultation, a statutory consultation and three rounds of targeted consultation in accordance with sections 42, 47 and 48 of the PA 2008. As required by section 37(3)(c) of PA 2008, the approach, responses and results of these consultations can be found within the **Consultation Report and associated appendices (Document Reference 5.1)** that accompanies this Application and details compliance with sections 42, 47, 48 and 49 of PA 2008. The **Design Approach Document (Document Reference 5.6)** has had the benefit of input from the Planning Inspectorate during its drafting and has been prepared as part of the PINS Early Adopter Programme which is exploring the establishment of new standards and improvements in design reporting and the interaction with consultation and environmental reporting and context. The Applicant held meetings with the Planning Inspectorate on the following dates 17/07/23, 26/09/23, 06/12/23, 20/02/24 and 15/03/24.
- j. Compliance with the relevant National Policy Statements (NPS) and other important and relevant matters such as UK energy and climate change policy, other national planning policies and the statutory development plan is set out in the **Planning Statement (Document Reference 5.2)**.

- k. The functional need that exists for the Proposed Scheme is detailed within the **Project Benefits Report (Document Reference 5.4)** which details the environmental, social and economic benefits of the Proposed Scheme. The Application is also accompanied by **Other Consents and Licences Report (Document Reference 5.5)** which provides information on the other consents, licences and permits that are or may be required under other legislation relevant to the Proposed Scheme, and that cannot or are not sought within the Draft DCO.
- l. The Applicant will keep all application documents under review and will provide updates on any change to the application documents during the course of the examination after considering questions and comments received from the Examining Authority and any interested parties.
- m. We look forward to hearing from you in relation to a formal acceptance decision of this Application. If you have any queries about the Application please do not hesitate to get in contact.

Yours sincerely



Richard Wilkinson
Cory – Project Director



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