



STATEMENT OF COMMON GROUND – LONDON BOROUGH OF BEXLEY: 8.1.2

DECARBONISATION

Cory Decarbonisation Project

PINS Reference: EN010128

September 2024

Revision A

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1. INTRODUCTION

1.1. Purpose of the Statement of Common Ground

- 1.1.1. A Statement of Common Ground (SoCG) is a written statement produced during the application process for a Development Consent Order (DCO) and is prepared jointly by the applicant and another party.
- 1.1.2. Paragraph 007 of the Ministry of Housing, Communities and Local Government (MHCLG) (formerly Levelling Up, Housing and Communities) guidance entitled ‘Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects’¹ (hereafter referred to as MHCLG Guidance) describes a SoCG as follows:
‘A Statement of Common Ground (SoCG) is a written statement prepared jointly by the applicant and another party or parties, setting out any matters on which they agree, or indeed disagree. A SoCG helps to ensure that the evidence at examination focusses on the material differences between the main parties and therefore makes best use of the lines of questioning pursued by the Examining Authority.’
- 1.1.3. This SoCG has been prepared in accordance with the MHCLG Guidance. The aim of a SoCG is to assist the Examining Authority in examining the DCO by providing an understanding of the status of discussions or negotiations between the applicant and the other party. The effective use of the SoCG aids an efficient examination process.
- 1.1.4. A SoCG may be submitted to the Planning Inspectorate either prior to the start of, or during, an Examination and is updated as necessary or as requested during the Examination.
- 1.1.5. This SoCG has been prepared on behalf of Cory Environmental Holdings Limited (‘the Applicant’). It accompanies the application for a DCO (‘the DCO Application’) in relation to the Cory Decarbonisation Project in Bexley, London. The DCO Application has been made in accordance with Section 37 of the Planning Act 2008 (as amended) and submitted to the Secretary of State (the SoS) of the Department for Energy Security and Net Zero (DESNZ).
- 1.1.6. The DCO, if granted, would authorise the construction, operation, maintenance and decommissioning of the Cory Decarbonisation Project (the Proposed Scheme). The Proposed Scheme is to be located at Norman Road, Belvedere in the London Borough of Bexley (National Grid Reference/NGR 549572,180512).
- 1.1.7. The Proposed Scheme is described in **Chapter 2: Site and Proposed Scheme Description** of the **Environmental Statement (Volume 1) (ES, APP-051)** and includes:

¹ <https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>

- the Carbon Capture Facility (including its associated supporting plant and ancillary infrastructure);
- a Proposed Jetty to allow for export of the captured carbon by vessel;
- a Mitigation and Enhancement Area;
- Temporary construction compounds; and
- Utilities Connections and Site Access Works.

1.2. INTRODUCTION TO LONDON BOROUGH OF BEXLEY

- 1.2.1. The Proposed Scheme falls within the administrative area of the London Borough of Bexley, which is consequently the relevant planning authority for the DCO Application. It is a relevant party with which to prepare a SoCG.
- 1.2.2. This SoCG addresses topics of interest to London Borough of Bexley and has been prepared between London Borough of Bexley and the Applicant (jointly referred to as the Parties) in relation to the DCO Application.

1.3. STATEMENT OF COMMON GROUND STRUCTURE

- 1.3.1. Following this introduction, Section 2 summarises all engagement to date of relevance to this SoCG and Section 3 details whether matters are Agreed, Under Discussion, or Not Agreed between the Parties.
- 1.3.2. In respect of matters relevant to the Proposed Scheme, but not referred to in this SoCG, the SCNRC group has no further comments to make at this point.
- 1.3.3. This SoCG is a document that is expected to evolve during the Examination, concluding with a version that confirms the Parties' positions on relevant matters, before the close of the Examination.

2. RECORD OF ENGAGEMENT

2.1.1. A summary of the meetings and correspondence that has taken place between the Applicant (Cory) and the London Borough of Bexley (LBB) in relation to the Proposed Scheme is outlined in Error! Reference source not found. below. There has been email correspondence between the Parties to discuss the sharing of information, arrangement of meetings and to share comment on draft documentation, not all of which has been reported. Table 2-1 focusses on the key meetings and emails of note that have taken place between the Parties.

Table 2-1 Schedule of Meetings and Correspondence

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
31/01/2023	Email correspondence	<p>Key Topic Townscape and Visual impact assessment viewpoint locations.</p> <p>Key Outcome N/A there is no response confirming the agreed list of viewpoints.</p>
13/02/2023 – 28/02/2023	Email correspondence	<p>Key Topic Enquiry related to contaminated land.</p> <p>Key Outcome LBB confirmed typical ground conditions in the area but could not provide answers to the other queries without a location plan. The Applicant issued the location plan on 28/02/2024.</p>
19/04/2024	Email correspondence	<p>Key Topic Scoping Report</p>

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<p>Key Outcome</p> <p>Cory informed LBB that the Scoping Report has been issued on PINS and that the consultation letters will be issued later on that day (19/04/2024).</p>
<p>09/05/2023</p>	<p>Introductory Meeting with London Borough of Bexley Officers</p>	<p>Key Topic</p> <p>Project introduction to LBB.</p> <p>Key Outcome</p> <p>Discussion of red line boundary. Cory confirmed many of the parcels were previously developed land and or/or benefitted from current/future development proposals and noted the sensitivity of the CNR and MOL designation. Cory outlined the engineering drivers that prioritise placing the carbon capture plant as close to the existing EfW facilities as possible. Cory confirmed discussion with Thames Water had commenced.</p> <p>Discussion of size, particularly height of plant. Cory confirmed design being progressed, with a view to developing design parameters to underpin the project.</p> <p>LBB advised that whilst the authority would like to see any BNG provided within the Borough, it was not able to provide any land (as it had done for REP).</p> <p>Discussion of air emissions. Cory to set up an air quality focused call to discuss nitrogen oxide emissions</p>
<p>12/05/2023</p>	<p>Meeting with the Emergency Planning team from London Borough of Bexley</p>	<p>Key Topic</p> <p>Introduce the project to the team, using the same presentation as meeting on 09/05/2023.</p>

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<p>Key Outcome</p> <p>Cory to arrange meeting with the London Fire Brigade (Jim Morford)</p> <p>Cory to organise site visit for the London Borough of Bexley Officers.</p>
<p>22/05/2023 – 11/03/2023</p>	<p>Email correspondence</p>	<p>Key Topic</p> <p>Traffic survey scoping requirements</p> <p>Key Outcome</p> <p>The contract information has been passed on for the officer at Transport for London.</p>
<p>25/05/2023</p>	<p>Email correspondence.</p>	<p>Key Topic</p> <p>Consultation Strategy</p> <p>Key Outcome</p> <p>First round of informal consultation confirmed from 05/06 to 15/07, with 2 pop up events: 16/06 and 17/06 2023.</p>
<p>23/05/2023</p>	<p>Air Quality Presentation – Microsoft Teams</p>	<p>Key Topic</p> <p>A discussion of the air quality impacts during both the construction and operation phases, the new pollutants introduced by carbon capture and any additional project scope.</p>

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<p>Key Outcome</p> <p>It was confirmed that for the construction air quality impacts that it will be the air quality standards in line with the Air Quality Strategy and not those produced by the Greater London Authority that should be considered.</p> <p>For the operational air quality impacts it was confirmed that all of the emissions will be assumed to be cumulative for the annual mean impacts and won't be combining worst case scenarios.</p> <p>There will be new pollutants introduced by carbon capture as amines are used as the solvent, however in the concentrations that will be released there will not be any significant health effects. There is not a standard of regulation for the amines, however the Environment Agency have defined assessment levels which will be used to assess the impacts.</p>
<p>19/06/2023-10/07/2023</p>	<p>Email correspondence</p>	<p>Key Topic</p> <p>Request for any usage records for PRoWslong distance walking routes as well as green spaces.</p> <p>Key Outcome</p> <p>LBB confirmed it did not hold records on usage and the condition of the PRoW. Advised the Applicant to undertake surveys.</p>
<p>19/07/2023</p>	<p>Email correspondence</p>	<p>PEIR update.</p> <p>Offer of an updated presentation and a site tour to LBB Members and Officers if this would be useful.</p>

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
14/09/2023	LBB Officers site visit and project update meeting	Site visit and discussion of wide range of topics such as navigation, traffic, ecological impacts, BNG, and the relationship with the wider CCS chain.
28/09/2023	LLFA Meeting	<p>Key Topics</p> <p>Items discussed: evolving design, including incorporating land level raise (by 1.5 to 2m) to 2.8m AOD; ditches to remove, the reasons and mitigation design; ditches to retain, easement and maintenance requirements; clarification of rivers condition assessment intended to understand physical flow, condition of banks and flow conveyance capacity, not an ecological survey; and drainage principles.</p> <p>Key Outcomes</p> <p>General agreement on approach to ditches (removals and retentions); standard easement of 8m alongside ditches, can be reduced with discussion; LBB generally content with outline drainage strategy, 40% climate change allowance to be used in modelling; FEH2013 agreed to be acceptable; no requirement to submit LBB SuDS proforma.</p>
28/09/2023 – 03/10/2023	Email Correspondence	<p>Key Topic</p> <p>PEIR and SoCC</p> <p>Key Outcome</p> <p>Confirmation that the SoCC has been accepted by LBB and that using the brochure as the non technical statement to the PEIR is acceptable.</p>
17/10/2023	LBB Members site visit and project update meeting	General overview of the Proposed Scheme followed by Q and A.

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
24/11/2023	LBB Officers' Project Update	<p>Key Topic</p> <p>Updates and Q & A were provided on the following topics:</p> <ul style="list-style-type: none"> • Consultation • National Policy • Environmental Statement • Improved Connections • Ecological Impacts, Mitigation and Enhancements • Ecological Compensation and Mitigation • Metropolitan Open Land • Project and Design Principles
05/01/2024	Email correspondence	<p>Key Topic</p> <p>Introduction of the project to the Urban Design Officer.</p> <p>Key Outcome</p> <p>It would be useful for LBB to have a future discussion with the Applicant's ecologist.</p>
06/03/2024	Landscape Strategy meeting	<p>Key Topic</p> <p>The Draft Design Approach Document was shared, the layout and design of the proposed development were then queried.</p> <p>Key Outcome</p>

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<p>Confirmation that Hydroen has been removed from the Proposed Development, with the focus now solely carbon capture.</p> <p>The choice of materials has not yet been confirmed and this will be influenced by final design.</p> <p>Pipework will run from the Riverside 1 and 2 developments to transport gas emissions, this has been discussed with the Friends of the Crossness Nature Reserve.</p> <p>Flood risk has not been increased by the compact layout, but the compact layout does allow for land at the southern end of Norman Road to be used for attenuation ponds.</p> <p>It is Cory's intention to keep BNG and mitigation as close as possible with the majority being on site.</p>
19/09/2024	Update following Relevant Representations meeting	<p>Key Topic General update on Cory's response to LBB Relevant Representations and to identify the key topics to discuss in future meetings.</p> <p>Key Outcome Both Parties agreed to progress further discussions seeking to agree as much as possible for the Examination. Likely topics for discussion (thought not limited to these) are land use and alternative sites; terrestrial biodiversity; and design.</p>
		<p>To be continued</p>

3. ISSUES

3.1. Terminology

3.1.1. The phrasing used in this SoCG are understood to have the following meanings:

- “Agreed” indicates where the issue has been resolved;
- “Under discussion” indicates where these points are the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties; and
- “Not Agreed” indicates a final position of the parties that is not agreed.

3.1.2. It can be taken that any matters not specifically referred to in this section of this SoCG are not of material interest or relevance to London Borough of Bexley’s representation and therefore have not been considered in this document.

3.2. MATTERS AGREED

3.2.1. **Table 3-1** below details the matters Agreed between the London Borough of Bexley (LBB) and the Applicant (Cory).

Table 3-1 Matters Agreed

Date	Topic	Form of Correspondence	Details of Matters Agreed
24/11/2023	Cycling Provision	LBB Officers’ Project Update	<p>Cycling connectivity. Cory enquired about the possibility of improving cycling links in the borough through the scheme.</p> <p>LBB confirmed this is an aspiration of LBB but likely to be located to the east, in the industrial area.</p> <p>Agreed, no cycling improvements required as part of the Proposed Scheme; LBB would continue to monitor with LBB Transport Team.</p>

Date	Topic	Form of Correspondence	Details of Matters Agreed
24/11/2023	Metropolitan Open Land	LBB Officers' Project Update	<p>Metropolitan Open Land designations within the London Borough of Bexley Plan (2023) and Greater London Plan (2021) are recognised to be slightly different.</p> <p>Parties agree to use the MOL designation as set out in the Bexley Local Plan (2023).</p>
14/06/2024	Land Use and Alternatives	Relevant Representation	<p>Agreed that development of the Proposed Scheme on the Strategic Industrial Location (SIL) allocation is policy compliant.</p>
14/06/2024	Landside Transport (Framework CTMP)	Relevant Representation and Meeting (19.09.2024)	<p>LBB has no objections in principle.</p> <p>The matter of potential for overspill parking (as has been experience recently from a development project) onto the surrounding highway was discussed, and confirmed not to be happening for Riverside 2. Noted that the Proposed Scheme provides for extensive parking for contractors.</p> <p>Agreed no further updates required to the Framework CTMP on this point.</p>
14/06/2024	Noise and Vibration	Relevant Representation	<p>LBB has no objections in principle.</p> <p>The draft CoCP has been reviewed and is considered to be acceptable.</p> <p>The Statutory Nuisance Statement has been reviewed and is considered to be acceptable.</p>

Date	Topic	Form of Correspondence	Details of Matters Agreed
			The requirements in relation to the control of noise and vibration, as set out in the draft DCO, have been reviewed and are considered to be acceptable.
14/06/2024	Water Environment and Flood Risk	Relevant Representation and Meeting (19.09.2024)	LBB has no objections in principle. The Applicant has confirmed that whilst a 50 year lifetime has been assumed for the Carbon Capture Facility, the Outline Drainage Strategy and relevant assessment includes the 40% climate change allowance as advised by the LLFA at meeting of 28 September 2023.
14/06/2024	Marine Navigation	Relevant Representation	LBB has no control over marine navigation in the River Thames and has no objections in principle.
14/06/2024	Socio-Economics	Relevant Representation	LBB has no objections in principle. The Applicant agrees to submission of a skills and employment plan, with provision as secured by requirement 15 of the draft DCO.
14/06/2024	Ground Conditions and Soil	Relevant Representation	LBB has no objections in principle subject to the imposition of requirement 21 of the draft DCO.
14/06/2024	Population and Health	Relevant Representation	LBB has no objections in principle.
14/06/2024	Materials and Waste	Relevant Representation	LBB has no objections in principle and no comment to make beyond those made elsewhere in the Relevant Representation.

Date	Topic	Form of Correspondence	Details of Matters Agreed
14/06/2024	Major Accidents	Relevant Representation	LBB has no objections in principle and no comment to make beyond those made elsewhere in the Relevant Representation.
14/06/2024	Cumulative Effects	Relevant Representation	LBB has no objections in principle and no comment to make beyond those made elsewhere in the Relevant Representation.
23/09/24	Arboriculture	SoCG	<p>The Applicant confirms that no trees are proposed to be felled for the Proposed Scheme. Some lopping may be undertaken as part of the establishment measures to deliver the LaBARDS, this would be confirmed in the full LaBARDS approved by LBB.</p> <p>LBB accept this position.</p>
			To be continued

3.3. MATTERS UNDER DISCUSSION

3.3.1. Table 3 below details the matters Under Discussion between the London Borough of Bexley (LBB) and the Applicant (Cory).

Table 2-2 Matters Under Discussion

Date	Topic	Form of Correspondence	Details of Matters Under Discussion
14/06/2024	Air Quality	Relevant Representation and Meeting (19.09.2024)	LBB has no objections in principle but has sought clarifications in its Relevant Representation. The Applicant will respond to LBB’s Relevant Representation in its response report and has provided information in the interim. The Parties will continue to discuss matters seeking to reach agreement.
14/06/2024	Greenhouse Gases	Relevant Representation and Meeting (19.09.2024)	The Applicant will respond to LBB’s Relevant Representation in its response report and has provided information in the interim. The Parties will continue to discuss matters seeking to reach agreement.
14/06/2024	Climate Resilience	Relevant Representation and Meeting (19.09.2024)	The Applicant will respond to LBB’s Relevant Representation in its response report, including updates to the Outline CoCP and has provided information in the interim. The Parties will continue to discuss matters seeking to reach agreement.

Date	Topic	Form of Correspondence	Details of Matters Under Discussion
14/06/2024	Land Use and Alternatives	Relevant Representation and Meeting (19.09.2024)	The Applicant will respond to LBB's Relevant Representation in its response report. The Parties will continue to discuss matters seeking to reach agreement.
14/06/2024	Terrestrial Biodiversity	Relevant Representation and Meeting (19.09.2024)	The Applicant will respond to LBB's Relevant Representation in its response report. The Parties will continue to discuss matters seeking to reach agreement.
14/06/2024	Marine Biodiversity	Relevant Representation	The Applicant will respond to LBB's Relevant Representation in its response report. The Parties will continue to discuss matters seeking to reach agreement.
14/06/2024	Landside Transport (draft DCO)	Relevant Representation and Meeting (19.09.2024)	LBB has no objections in principle but clarification is sought regarding provisions of the draft DCO as set out in its Relevant Representations. The Applicant will respond to LBB's Relevant Representation in its response report, including updates to the draft DCO and has provided information in the interim. The Parties will continue to discuss matters seeking to reach agreement.
14/06/2024	Historic Environment	Relevant Representation and Meeting (19.09.2024)	LBB has no objections in principle on Heritage matters. The Applicant will respond to LBB's Relevant Representation in its response report. The Parties will continue to discuss matters seeking to reach agreement.

Date	Topic	Form of Correspondence	Details of Matters Under Discussion
14/06/2024	Townscape and Visual	Relevant Representation and Meeting (19.09.2024)	The Applicant will respond to LBB's Relevant Representation in its response report. The Parties will continue to discuss matters seeking to reach agreement.
			To be continued

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3.4. MATTERS NOT AGREED

3.4.1. **Table 3-3** below details the matters Not Agreed between the London Borough of Bexley (LBB) and the Applicant (Cory).

Table 3-3 Matters Not Agreed

Date	Topic	Form of Engagement	Details of Matters Not Agreed
			Not matters confirmed to be Not Agreed to date

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4. SIGNATORIES

	London Borough of Bexley	Cory Environmental Holdings Ltd (the Applicant)
Signed		
Printed Name		
Title		
On behalf of	London Borough of Bexley	Cory Environmental Holdings Ltd
Date		

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