



**STATEMENT OF
COMMON GROUND –
SAVE CROSSNESS
NATURE RESERVE
CAMPAIGN GROUP:
8.1.26**

DECARBONISATION

Cory Decarbonisation Project

PINS Reference: EN010128

September 2024

Revision A

QUALITY CONTROL

Document Reference		8.1.26			
Document Owner		Cory Environmental Holdings Limited			
Revision	Date	Comments	Author	Check	Approver
Revision A	August 2024	-			

DRAFT

SIGNATORIES

	Save CNR Campaign Group	Cory Environmental Holdings Limited (the Applicant)
Signed		
Printed Name		
Title		
On behalf of	Save CNR Campaign Group	Cory Environmental Holdings Limited
Date		

DRAFT

TABLE OF CONTENTS

1. INTRODUCTION	1
1.1. Purpose of the Statement of Common Ground	1
1.2. Terminology	4
1.3. Introduction To Crossness Nature Reserve	2
2. RECORD OF ENGAGEMENT	3
3. ISSUES	4
3.1. Matters Agreed.....	4
3.2. Matters Under Discussion	7
3.3. Matters Not Agreed	9

TABLE

Table 1 Schedule of Meetings and Correspondence during the Preapplication Stage	3
Table 2 Matters Agreed.....	4
Table 3 Matters Under Discussion	7
Table 4 Matters Not Agreed.....	9

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:
- the Carbon Capture Facility (including its associated supporting plant and ancillary infrastructure);

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

- 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 Save Crossness Nature Reserve Campaign Group

- 1.2.1. Crossness Nature Reserve is a 25.5 hectare local nature reserve, forming part of the Erith Marshes Site of Metropolitan Importance for Nature Conservation (MSINC). The site is adjacent to Crossness Sewage Treatment Works, which forms the reserve's western boundary. It was created under a section 106 planning agreement in 1994 and is owned and managed by Thames Water.
- 1.2.2. Save Crossness Nature Reserve (SCNRC) group is made up of local residents, bird watchers, local campaigners and environmentalists, many of whom are members of the Friends of Crossness Nature Reserve (FoCNR).
- 1.2.3. This SoCG addresses topics of interest to the SCNRC group and has been prepared between the SCNRC group 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. The Applicant has previously engaged with the Friends of Crossness Nature Reserve as set out in the Statement of Common Ground prepared with them (Document Reference 8.1.6).
- 2.1.2. Having received Relevant Representations from the Save Crossness Nature Reserve Campaign (SCNRC) group (RR-178), the Applicant will seek to engage with them to develop this Statement of Common Ground.

1

DRAFT

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 the Friends of Crossness Nature Reserve’s representation and therefore have not been considered in this document.

3.2. MATTERS AGREED

3.2.1. Table 1 below details the matters agreed between the SCNRC group and the Applicant (Cory).

Table 2 Matters Agreed

Topic	Sub-topic	Details of Matters Agreed
Crossness Nature Reserve	Formation	On 21 January 1994, outline planning permission was granted (reference 91/01318/OUT for the ‘ <i>construction of a sewage sludge incinerator using the fluidised bed process with dewatering, ash collection and gas cleaning facilities.</i> ’ The consent was subject to a s.106 agreement, also dated 21 January 1994, with principal commitment for Thames Water to ‘ <i>maintain and enhance the Conservation Land for a period of 99 years from the date of approval of the Management Plan by the Chief Planning Officer ...</i> ’

		(paragraph 4.3 of the s.106 agreement.) The Conservation Land referred to within the s.106 agreement is the Crossness LNR.
	Funding	<p>As required under clause 4.4 of the s.106 agreement, Thames Water paid a sum of money (to the value of not less than £150,000 and not more than £300,000) for the future objectives maintenance and enhancement of the Crossness Nature Reserve. Thames Water funds a full time Manager for the Crossness Nature Reserve.</p> <p>Public funds (in 20025 and 2014) were secured for works on the Crossness Nature Reserves, including the stables.</p> <p>Maintenance and management works are otherwise undertaken by the FoCNR and other volunteers.</p>
	Designation	<p>Crossness Nature Reserve is a Local Nature Reserve located within the Erith Marshes Site of Importance for Nature Conservation (metropolitan).</p> <p>It is also designated Metropolitan Open Land (MOL)</p>
	Horse grazing	<p>Grazing by horses is an important element of the management of the Reserve. Graziers have been in this area for generations by families with historic ties to the land.</p>
Carbon Capture Facility	Principle of development	<p>Climate change is a global priority and the UK Government is seeking rapid decarbonisation, with a legal requirement for the UK to achieve Net Zero by 2050.</p> <p>The Cory Decarbonisation Project would capture carbon dioxide emissions from Riverside 1 and Riverside 2. Both fossil and biogenic carbon will be captured, as waste from households and businesses is composed of materials which contain biogenic carbon such as paper,</p>

		<p>cardboard, and wood, as well as fossil carbon from materials containing plastics. By capturing the fossil carbon (circa. 50%), Cory’s operations will achieve net zero, i.e. no new carbon will be released into the atmosphere. By also capturing the carbon from biogenic materials, Cory’s operations will be carbon negative, because carbon that is part of the natural carbon cycle will be captured and stored, and thus permanently removed from the atmosphere.</p>
	<p>Site location</p>	<p>The Carbon Capture Facility is proposed to be located on land immediately adjacent to, and on the western side of, Norman Road.</p> <p>The site of the Carbon Capture Facility substantially (some 70%) utilises land allocated as Strategic Industrial Location within the Bexley Local Plan. This element complies with local plan policy.</p> <p>The site of the Carbon Capture Facility also utilises land within the Crossness Nature Reserve that would result in the loss of habitat, for which mitigation is required.</p>
<p>Riverside 1 and Riverside 2</p>	<p>Designations</p>	<p>Riverside 1 (operational) and Riverside 2 (under construction) are energy recovery facilities that have been granted the necessary planning permission and Environmental Permit. They are located on land allocated as Strategic Waste Management in the Bexley Local Plan.</p>

3.3. MATTERS UNDER DISCUSSION

3.3.1. Table 3 below details the matters Under Discussion between Friends of Crossness Nature Reserve (FoCNR) and the Applicant (Cory).

Table 3 Matters Under Discussion

Topic	Sub-topic	Details of Matters Under Discussion
Accessible Open Land	Accessible Open Land	<p>That there is clarity that Accessible/Non-Accessible Open Land does not relate the ecological quality or habitats of the land. The terms are used to reflect whether land is open space always available to the general public to stand on/within and enjoy.</p> <p>For example:</p> <ul style="list-style-type: none"> - The East and Stable Paddocks can be observed from the public highway and Accessible Open Land. However, they are not open to general public to enter, stand within and enjoy. - The Protected/Members Area is accessible only to FoCNR and their guests.
Heat	Heat	<p>Cory has been involved in the Bexley District Heating Partnership, with other partners including London Borough of Bexley and Greater London Authority. Cory has recently employed a Managing Director for Heat and is progressing a strategic programme of delivering a district heat network in the locality and deploying mobile heat batteries.</p>

		Heat from the carbon capture process is identified as an additional benefit of the Proposed Scheme, which includes the infrastructure necessary to export it from site.
Terrestrial Ecology	Survey data	Whether the environmental surveys are satisfactory and provide an appropriate baseline for the assessment and consequent mitigation and enhancement proposals.

DRAFT

3.4. MATTERS NOT AGREED

3.4.1. Table 4 below details the matters Not Agreed between the Friends of Crossness Nature Reserve (FoCNR) and the Applicant (Cory).

Table 4 Matters Not Agreed

Topic	Sub-topic	Details of Matters Not Agreed
Site location	Site alternatives assessment	That there are other reasonable site alternative that would deliver the Project Objectives.
Terrestrial Ecology	Mitigation and Enhancement Area	<p>That the mitigation and enhancement proposed in the Norman Road Field and the Crossness Nature Reserve will not be beneficial to habitats and improve access for people.</p> <p>That the former Thamesmead Golf Course does not provide an appropriate opportunity for off-site biodiversity net gain.</p>
Visual and Townscape	Visual and Townscape Impact	That the level of impact has been underestimated.

4. SIGNATORIES

	Save Crossness Nature Reserve Campaign	Cory Environmental Holdings Ltd (the Applicant)
Signed		
Printed Name		
Title		
On behalf of	Save Crossness Nature Reserve Campaign Group	Cory Environmental Holdings Ltd
Date		

DRAFT



DECARBONISATION

10 Dominion Street
Floor 5
Moorgate, London
EC2M 2EF
Contact Tel: 020 7417 5200
Email: enquiries@corygroup.co.uk
corygroup.co.uk