



**STATEMENT OF  
COMMON GROUND  
- GREATER  
LONDON  
ARCHAEOLOGY  
ADVISORY  
SERVICE: 8.1.9**

**DECARBONISATION**

**Cory Decarbonisation Project**

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Revision A

## QUALITY CONTROL

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<b>Date</b>	06/09/2024	18/09/2024

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## 1. INTRODUCTION

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### 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 Department for Ministry for Housing Communities and Local Government (MHCLG) Guidance entitled 'Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects' (30 April 2024) (hereafter referred to as MHCLG Guidance)<sup>1</sup> 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 the examination focuses 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<sup>1</sup>. 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 SoCG aid 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 by WSP UK Limited 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') 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 (LBB) (National Grid Reference/NGR 549572, 180512).
- 1.1.7. The Proposed Scheme is described in **Chapter 2: Site and the Proposed Scheme (Volume 1)** of the **ES (Planning Inspectorate Reference APP-051)** and includes:
- 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 GREATER LONDON ARCHAEOLOGY ADVISORY SERVICE (GLAAS)**

- 1.2.1. This SoCG has been prepared between the Greater London Archaeology Advisory Service (GLAAS) and the Applicant (jointly referred to as the Parties) in relation to the DCO Application. Hereafter the Greater London Archaeology Advisory Service are referred to as 'GLAAS'.
- 1.2.2. GLAAS provides archaeological planning advice to local authority planners, developers and their agents, providing advice for the whole of Greater London (with the exception of the London Borough of Southwark). Advice and consultation responses are typically provided as part of non-statutory consultation and engagement, in response to the Environmental Impact Assessment (EIA) Scoping Report<sup>2</sup>, as part of statutory consultation including on the Preliminary Environmental Information Report (PEIR)<sup>3</sup> and participation in the Examination process.

## **1.3. STATEMENT OF COMMON GROUND STRUCTURE**

- 1.3.1. Section 2 summarises all engagement to date of relevance to this SoCG and Section 3 details whether matters are Agreed, Not Agreed or Under Discussion between the Parties.
- 1.3.2. In respect of matters relevant to the Proposed Scheme but not referred to in this SoCG, the GLAAS has no further comments to make at this point. It may have further or additional comments to make, particularly if further information about the project becomes available.
- 1.3.3. The SoCG is a document that will evolve during the Examination stage and will conclude 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 and GLAAS in relation to the Proposed Scheme is outlined in **Table 2-1** 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, but this table reflects the key meetings and emails of note that have taken place between the Parties.

**Table 2-1 – Schedule of Meetings and Correspondence during the Pre-Application Stage**

Date	Form of Correspondence	Summary of Matters Dealt with in Correspondence/ Meeting
20 <sup>th</sup> – 21 <sup>st</sup> September 2023	Email	<p>The Applicant's consultants (WSP) contacted GLAAS regarding the proposed survey methodology and general mitigation strategy for the Proposed Scheme (as outlined in Section 9.9 of the PEIR<sup>3</sup>). The following key topics were discussed:</p> <ul style="list-style-type: none"> <li>• Geoarchaeological Deposit Modelling;</li> <li>• Requirement and timing of intertidal foreshore surveys – GLAAS stated the survey would need to commence prior to work commencement, periodically during the work and then up to six months following last foreshore development impact;</li> <li>• The potential impact of temporary works;</li> <li>• The potential demolition of the Belvedere Power Station Jetty (disused); and</li> <li>• GLAAS recommended community engagement element to any final mitigation and welcomed appropriate actions that could be presented within an anticipated method statement.</li> </ul>

Date	Form of Correspondence	Summary of Matters Dealt with in Correspondence/ Meeting
<p>5<sup>th</sup> – 6<sup>th</sup>            October 2023</p>	<p>Email</p>	<p>The Applicant's consultants provided a response via email to GLAAS to request clarification on the likely timings of any surveys/mitigation with respect to pre and post application for development consent submission, and to provide further justification for the archaeological potential as set out in the PEIR<sup>4</sup>. Clarification was sought on several points:</p> <ul style="list-style-type: none"> <li>• Archaeological surveys and mitigation timing: requested clarity on the expected timeframe for pre-application and post-application archaeological surveys/mitigation strategies.</li> <li>• The Applicant's consultants suggested that the proposed updated geoarchaeological deposit model is not used prior to submission to inform more extensive intrusive evaluation (e.g. trial trenching) for the purposes of informing design (i.e. through avoidance where significant archaeological remains are identified). The Applicant's consultants proposed that the deposit model form the final archaeological mitigation, used to map subsurface deposits and subsurface topography across the Site as a whole (including the marine and intertidal areas) for posterity.</li> </ul> <p>On 6<sup>th</sup> October, GLAAS agreed that the archaeological deposit model could be produced post-determination under a DCO requirement, once wider geotechnical investigations (GI) have been carried out. GLAAS also agreed that the marine geophysical surveys could be conducted post-determination as a DCO requirement. Once the foreshore survey and geotechnical data has been analysed, the requirements for further mitigation would need to be discussed and agreed.</p>

2.1.2. It is agreed **Table 2-1** is an accurate record of the key meetings, consultation undertaken between the Applicant and GLAAS in relation to the issues addressed in this SoCG as at the date of this SoCG.



### 3. ISSUES

#### 3.1. TERMINOLOGY

3.1.1. In the tables in this section of this SoCG:

- “Agreed” indicates where the issue has been resolved;
- “Under Discussion” indicates where these points are the subject of ongoing 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 Interested Parties 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 with GLAAS.

**Table 3-1 – Matters Agreed**

Date	Form of Correspondence	Details of Matters Agreed
20 <sup>th</sup> – 21 <sup>st</sup> September 2023	Email	<ul style="list-style-type: none"> <li>• GLAAS agreed with the general approach to survey methodology and mitigation strategy outlined in the PEIR<sup>3</sup> and reflected in the ES<sup>4</sup>.</li> <li>• GLAAS agrees to a Historic England Level 2 recording of the Belvedere Power Station Jetty (disused) if demolished being an appropriate mitigation strategy. This is included within the Outline CocP and secured by DCO Requirement.</li> </ul>

Date	Form of Correspondence	Details of Matters Agreed
5-6 <sup>th</sup> October 2023	Email	<ul style="list-style-type: none"> <li>• Post-Determination Model and Marine Geophysical Surveys: GLAAS agreed to the production of the deposit model and marine geophysical surveys after the securing of development consent (pursuant to DCO Requirement 22).</li> <li>• Further Mitigation Discussions: GLAAS agreed that it would be necessary to analyse the foreshore survey and geotechnical data before finalising the details of final archaeological mitigation. As such, this could be resolved post DCO consent, pursuant to DCO Requirement 22.</li> </ul>

### 3.3. MATTERS UNDER DISCUSSION

3.3.1. No matters remain Under Discussion with GLAAS.

### 3.4. MATTERS NOT AGREED

3.4.1. No matters remain Not Agreed with GLAAS.

## 4. REFERENCES

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- <sup>1</sup> UK Government. 2008. 'Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects'. Available at: <https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>
- <sup>2</sup> Cory Environmental Holdings Limited. (2023). 'Environment Impact Assessment Scoping Report: Cory Decarbonisation Project'. Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010128/EN010128-000021-EN010128%20-%20Scoping%20Report.pdf>
- <sup>3</sup> Cory Environmental Holdings Limited. (2023). 'Preliminary Environmental Information Report: Cory Decarbonisation Project'. Available at: <https://corydecarbonisation.co.uk/document-library/>
- <sup>4</sup> Planning Inspectorate. (2024). 'Cory Decarbonisation Project Documents'. Available at: <https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010128/documents>