



# STATEMENT OF COMMON GROUND - KENT COUNTY COUNCIL: 8.1.29

DECARBONISATION

## Cory Decarbonisation Project

PINS Reference: EN010128

October 2024

Revision A

## QUALITY CONTROL

<b>Document Reference</b>		<b>8.1.29</b>			
<b>Document Owner</b>		Cory Environmental Holdings Limited			
<b>Revision</b>	<b>Date</b>	<b>Comments</b>	<b>Author</b>	<b>Check</b>	<b>Approver</b>
Revision A	October 2024	-	DR	SH	JW

Draft

	Kent County Council	Cory Environmental Holdings Limited (the Applicant)
Signed		
Printed Name		
Title		
On behalf of	Kent County Council	Cory Environmental Holdings Limited
Date		

Draft

## TABLE OF CONTENTS

---

<b>1. INTRODUCTION.....</b>	<b>4</b>
1.1. Purpose of the Statement of Common Ground .....	4
1.2. Introduction to Kent County Council.....	5
1.3. Statement of Common Ground Structure.....	5
<b>2. RECORD OF ENGAGEMENT .....</b>	<b>6</b>
<b>3. ISSUES .....</b>	<b>10</b>
3.1. Terminology .....	10
3.2. Matters Agreed.....	11
3.3. Matters Under Discussion .....	13
3.4. Matters Not Agreed .....	13
<b>4. REFERENCES.....</b>	<b>14</b>

## TABLES

---

Table 2-1 Schedule of Meetings and Correspondence during the Preapplication Stage .....	6
Table 3-1 Matters Agreed .....	11
Table 3-2 Matters Under Discussion.....	13

## 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 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 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 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) 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);
  - 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 KENT COUNTY COUNCIL**

- 1.2.1. This SoCG has been prepared between Kent County Council and the Applicant (jointly referred to as the Parties) in relation to the DCO Application. Hereafter Kent County Council is referred to as 'KCC'.
- 1.2.2. The anticipated construction vehicle route for the Proposed Scheme falls within the administrative area of Dartford Borough Council (DBC). KCC is the local highway authority for this administrative area and is therefore a relevant party with which to prepare a SoCG.
- 1.2.3. Advice and consultation responses by KCC 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, KCC 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 and KCC in relation to the Proposed Scheme is outlined in the Table below. There has been email correspondence between the parties to discuss the sharing of information, arrangement of meetings, and for them to 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 Preapplication Stage**

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
22 <sup>nd</sup> May 2023	Email	<p>The Applicant shared the proposed traffic survey scope and construction/operation traffic routeing, which included:</p> <ul style="list-style-type: none"> <li>• Proposed traffic survey types and locations;</li> <li>• Proposed construction traffic routeing between the Site and Strategic Road Network (SRN); and</li> <li>• Proposed traffic survey timings.</li> </ul>
25 <sup>th</sup> May 2023	Email	<p>Response from KCC to the email sent by the Applicant on 22nd May which:</p> <ul style="list-style-type: none"> <li>• Noted the area of Dartford around the SRN is heavily congested; and</li> <li>• Noted that Riverside 2 did not require modelling of the A2026 Burnham Road junction, nor the A282 J1a or J1b as the level of predicted traffic generation did not warrant assessment. KCC agreed that if the level of traffic anticipated for the Proposed Scheme was to be similar to that anticipated for Riverside 2, then this assumption would likely to remain and therefore no traffic surveys would be required at these junctions. KCC noted evidence should be provided at the appropriate time to demonstrate this.</li> </ul>

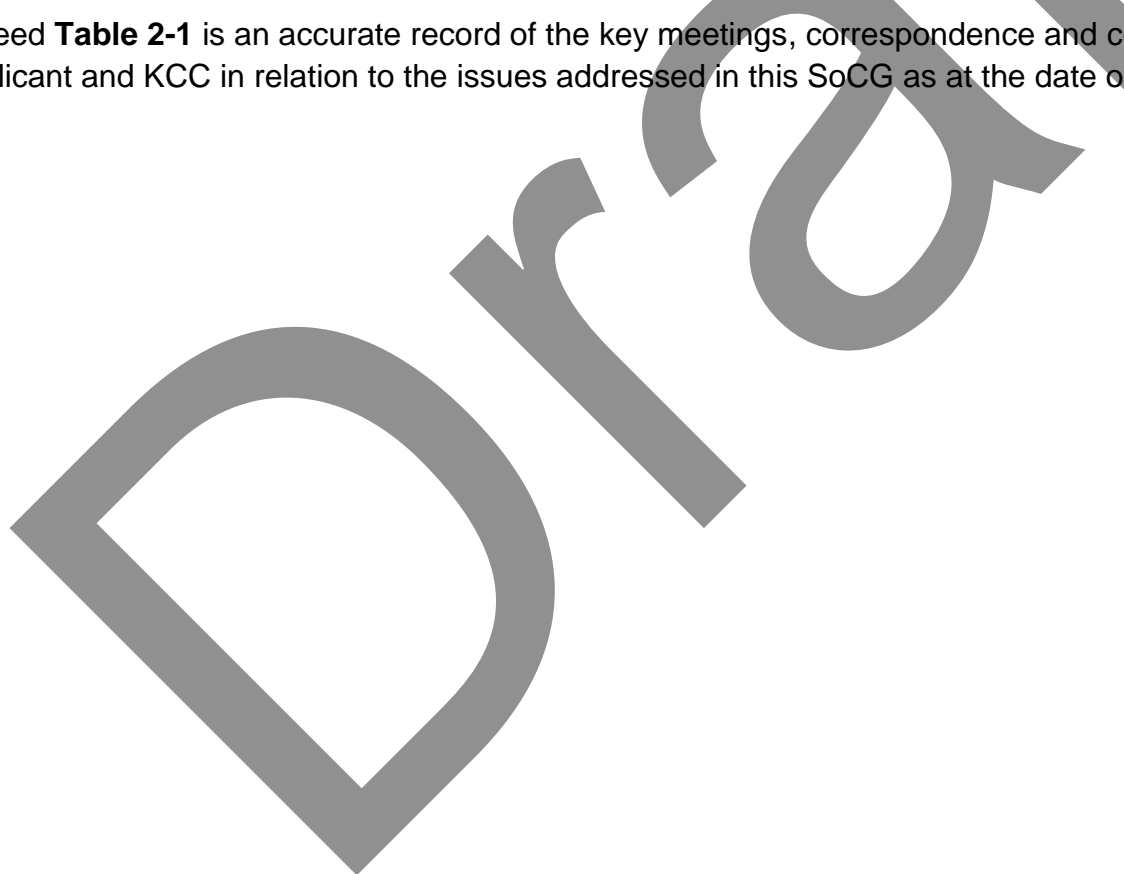
Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
20 <sup>th</sup> October 2023	Email, with attached Memorandum	Update on the Proposed Scheme following submission of PEIR <sup>4</sup> , whilst also detailing (through a supporting memorandum) the proposed methodology for the EIA/Transport Assessment (presented in <b>Appendix 18-1: Transport Assessment (Volume 3) (APP-114)</b> ).
20 <sup>th</sup> November 2023	Email	<p>Response to the email sent by the Applicant on 20<sup>th</sup> October which:</p> <ul style="list-style-type: none"> <li>• Noted that the Transport Assessment (presented as <b>Appendix 18-1: Transport Assessment (Volume 3)</b>) should review the Kent Emerging Local Transport Plan 5: Turning the Curve Towards Net Zero 2023<sup>5</sup> dated June 2023.</li> <li>• Recommended the review of traffic assignment given the passage of time since Riverside 2 assessment and the changes in travel patterns which have occurred in the interim.</li> <li>• Noted that traffic data from the surveys should be provided to confirm that the assessment of traffic impact does not need to be extended further.</li> </ul>
18 <sup>th</sup> October 2023	Email	Applicant requested KCC supply personal injury accident data for the most recent five-year period for the part of the landside transport Study Area maintained by KCC.
4 <sup>th</sup> April 2024	Adequacy of Consultation Representation	KCC acknowledged that adequate consultation had been undertaken by the Applicant.
14 <sup>th</sup> June 2024	Letter	<p>KCC submitted its <b>Relevant Representation (RR) (RR-110)</b>, raising the following topics:</p> <ul style="list-style-type: none"> <li>• Transportation of construction materials via river;</li> <li>• The Applicant's traffic survey extent;</li> <li>• Distribution and assignment of construction vehicles onto the network;</li> </ul>



Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<ul style="list-style-type: none"> <li>• Construction traffic impacts on the A206, A2026 and at the M25/A282 Junction 1A;</li> <li>• <b>Appendix 18-1: Transport Assessment (Volume 3) (APP-114)</b>; and</li> <li>• The <b>Framework Construction Traffic Management Plan (CTMP) (APP-127)</b>.</li> </ul> <p>The Applicant responded to the points raised in the RR (RR-110) within the <b>Response to Relevant Representation Report (AS-043)</b>.</p>
1 <sup>st</sup> October 2024	Email	<p>Ahead of a meeting arranged for 9<sup>th</sup> October 2024, the Applicant sent the following to KCC:</p> <ul style="list-style-type: none"> <li>• Revision B of the <b>Framework CTMP (APP-031)</b>; and</li> <li>• A Technical Note which provided a more detailed forecast of construction worker vehicle movements across the construction phase, supplementing the worst-case assessment undertaken in <b>Chapter 18: Landside Transport</b> of the <b>Environmental Statement (Volume 1) (APP-067)</b> and the accompanying <b>Appendix 18-1: Transport Assessment (Volume 3) (APP-114)</b>.</li> </ul>
9 <sup>th</sup> October 2024	Meeting	<p>A meeting attended by National Highways, the London Borough of Bexley and KCC was held, during which the following was discussed:</p> <ul style="list-style-type: none"> <li>• Key issues raised in the Relevant Representations;</li> <li>• Peak construction phase duration and anticipated highway impact; and</li> <li>• Revision B of the <b>Framework CTMP (APP-031)</b> and matters regarding:             <ul style="list-style-type: none"> <li>• HGV routeing;</li> <li>• Contractor appointment;</li> <li>• Riverside 2 CTMP;</li> <li>• Impacts on the SRN;</li> </ul> </li> </ul>

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<ul style="list-style-type: none"> <li>• Impacts on the Local Road Network (LRN);</li> <li>• SoCG; and</li> <li>• Non-material amendment.</li> </ul>
14 <sup>th</sup> October 2024	Email	KCC provided written comments regarding Revision B of the <b>Framework CTMP (APP-031)</b> and the Technical Note (as issued by the Applicant on 1 <sup>st</sup> October 2024).

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



### 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 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 KCC'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 KCC and the Applicant (Cory).

**Table 3-1 Matters Agreed**

Date	Form of Engagement	Details of Matters Agreed
25 <sup>th</sup> May 2023	Email	KCC agreed that if the level of construction traffic anticipated for the Proposed Scheme was to be similar to that anticipated for Riverside 2, then junction capacity modelling of the A2026 Burnham Road junction, the A282 J1a or J1b was not required..
14 <sup>th</sup> June 2024	Letter	<p>The Applicant and KCC are in agreement with regard to the following:</p> <ul style="list-style-type: none"> <li>• There are areas of existing congestion in Dartford, including the A206 Bob Dunn Way and the A282 J1a;</li> <li>• The traffic generation from the operation phase of the Proposed Scheme is likely to be low resulting in negligible impacts on the surrounding network, as concluded within <b>Chapter 18: Landside Transport</b> of the <b>Environmental Statement (Volume 1) (APP-067)</b> and the accompanying <b>Appendix 18-1: Transport Assessment (Volume 3) (APP-114)</b>; and</li> <li>• Future construction workers and employees are to be encouraged to travel by sustainable modes through the implementation of Workforce Travel Plans.</li> </ul>
9 <sup>th</sup> October 2024	Meeting	KCC agreed that physical highway capacity improvements to the A206 Bob Dunn Way and Junction 1a of the A282 would not be required to mitigate the temporary impact of additional construction vehicle movements on the highway network thus negating the need for junction capacity assessment. It was agreed that the limited impact could be mitigated through the full CTMP (in accordance with the <b>Framework CTMP (AS-31)</b> ).

Date	Form of Engagement	Details of Matters Agreed
		<p>The Applicant has agreed to:</p> <ul style="list-style-type: none"> <li>• Update the draft HGV Routeing Plan to show the M25/A282 J1A. The plan is shown as Figure 3, within the <b>Framework CTMP (AS-31)</b> and will be submitted at Deadline 1.</li> <li>• Review the bus routes currently servicing the local bus stops.</li> </ul>
14 <sup>th</sup> October 2024	Email	<p>KCC agreed that construction workers will not all arrive in a single peak hour as assumed for the worst case assessment provided in <b>Chapter 18: Landside Transport</b> of the <b>Environmental Statement (Volume 1) (APP-067)</b> and the accompanying <b>Appendix 18-1: Transport Assessment (Volume 3) (APP-114)</b>, but rather across a number of hours.</p>

Draft

### 3.3. MATTERS UNDER DISCUSSION

3.3.1. **Table 3-2** below details the matters Under Discussion with KCC.

**Table 2-2 Matters Under Discussion**

Date	Form of Engagement	Details of Matters Under Discussion
9 <sup>th</sup> October 2024	Meeting	<p>The following matters are under discussion following the meeting:</p> <ul style="list-style-type: none"> <li>The need for additional measures for inclusion within the <b>Framework CTMP (AS-031)</b> to incentivise travel outside peak periods, if appropriate. The Applicant will confirm its position at Deadline 1.</li> </ul>
14 <sup>th</sup> October 2024	Email	<p>In addition to the above, the following matters are under discussion:</p> <ul style="list-style-type: none"> <li>The potential for further updates to the <b>Framework CTMP (AS-031)</b> to communicate live incidents at the Dartford Crossing, encourage car-sharing and strengthen commitments to collect construction traffic data for the Proposed Scheme. The forecast construction worker travel patterns, including application of 2021 Census mode share data for Bexley 003 Middle-Layer Super Output Area (MSOA) and car driver distribution and assignment .</li> </ul> <p>The Applicant will provide an update on these matters at Deadline 1.</p>

### 3.4. MATTERS NOT AGREED

3.4.1. No matters remain that are Not Agreed between KCC and the Applicant.

## 4. REFERENCES

---

- <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/ipc/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> Cory Environmental Holdings Limited. (2023). 'Preliminary Environmental Information Report: Cory Decarbonisation Project'. Available at: <https://corydecarbonisation.co.uk/document-library/>
- <sup>5</sup> Kent County Council. (2023). 'Turning the Curve Towards Net Zero'. Available at: <https://letstalk.kent.gov.uk/23735/widgets/70451/documents/52605>



## DECARBONISATION

10 Dominion Street  
Floor 5  
Moorgate, London  
EC2M 2EF  
Contact Tel: 020 7417 5200  
Email: [enquiries@corygroup.co.uk](mailto:enquiries@corygroup.co.uk)  
**[corygroup.co.uk](http://corygroup.co.uk)**