



STATEMENT OF COMMON GROUND - NATIONAL HIGHWAYS: 8.1.31

DECARBONISATION

Cory Decarbonisation Project

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	National Highways	Cory Environmental Holdings Limited (the Applicant)
Signed		
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Title		
On behalf of	National Highways	Cory Environmental Holdings Limited
Date		

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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 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)¹ 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 Guidance¹. 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 NATIONAL HIGHWAYS

- 1.2.1. This SoCG addresses topics of interest to National Highways and has been prepared between National Highways and the Applicant (jointly referred to as the Parties) in relation to the DCO Application.
- 1.2.2. National Highways is a statutory consultee as prescribed under Section 42(1)(a) (duty to consult) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).
- 1.2.3. Advice and consultation responses by National Highways are typically provided as part of non-statutory consultation and engagement (in response to the Environmental Impact Assessment (EIA) Scoping Report²), as part of statutory consultation (including on the Preliminary Environmental Information Report (PEIR)³) 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, National Highways 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 National Highways 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
27 th November 2023	Section 42 Response Letter	<p>National Highways' Section 42 Response made comments on the following topics of the PEIR³:</p> <ul style="list-style-type: none"> • The location of the Proposed Scheme in relation to the Strategic Road Network (SRN). • Construction trips (vehicular, HGV and workforce) and the impact on the M25/A282 J1a. • Production of a full Transport Assessment, construction phasing and possible mitigation measures. <p>The Applicant responded to the points raised in the Section 42 Letter within Table 18-3 of Chapter 18: Landside Transport of the Environmental Statement (Volume 1) (APP-067).</p>
14 th June 2024	Letter	<p>National Highways submitted its Relevant Representation (RR) (RR-149), raising the following topics:</p> <ul style="list-style-type: none"> • Information within Appendix 18-1: Transport Assessment of the Environmental Statement (Volume 1) (APP-114). • Construction traffic impact at the M25/A282 Junction 1a.

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<ul style="list-style-type: none"> The duration of the peak construction workforce traffic period within the potential options presented for the construction programmes. The Framework Construction Traffic Management Plan (CTMP) (AS-031). Wording within the Draft DCO (AS-046). <p>The Applicant responded to the points raised in the RR (RR-149) within the Response to Relevant Representation Report (AS-043).</p>
1st October 2024	Email	<p>Ahead of a meeting arranged for 9th October 2024, the Applicant sent the following to National Highways:</p> <ul style="list-style-type: none"> Revision B of the Framework CTMP (APP-031); and 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 Chapter 18: Landside Transport of the Environmental Statement (Volume 1) (APP-067) and the accompanying Appendix 18-1: Transport Assessment (Volume 3) (APP-114).
9th October 2024	Meeting	<p>A meeting attended by National Highways, the London Borough of Bexley and Kent County Council was held, during which the following was discussed:</p> <ul style="list-style-type: none"> Key issues raised in the Relevant Representations from these parties; Peak construction phase duration and predicted peak highway impact; and Revision B of the Framework CTMP (APP-031) and matters regarding: <ul style="list-style-type: none"> HGV routeing; Contractor appointment; Riverside 2 CTMP; Impacts on the SRN;

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<ul style="list-style-type: none"> - Impacts on the Local Road Network (LRN); - SoCG; and - Non-material amendment.

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 National Highways in relation to the issues addressed in this SoCG as at the date of this SoCG.

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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 National Highways’ 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 National Highways and the Applicant (Cory).

Table 3-1 Matters Agreed

Date	Form of Engagement	Details of Matters Agreed
27 th November 2023	Section 42 Response Letter	<p>The Applicant and National Highways are in agreement with regards to the following:</p> <ul style="list-style-type: none"> • The approximate number of construction HGV trips and construction workforce peak trips generated by the Proposed Scheme. • A full Transport Assessment and full Environmental Statement will, and subsequently has been, submitted as part of the application for development consent.
14 th June	Letter	<p>The Applicant and National Highways are in agreement with regards to the following:</p> <ul style="list-style-type: none"> • The approximate number of construction HGV trips and construction workforce peak trips generated by the Proposed Scheme set out in Appendix 18-1: Transport Assessment (APP-114). • That a full CTMP, in accordance with Revision B of the Framework CTMP (APP-031) will ensure that any further required measures are identified and implemented, if necessary. • The wording of DCO Requirements 9 and 24 within Revision B of the Draft DCO (AS-014).
9 October 2024	Meeting	<p>The Applicant has agreed to:</p> <ul style="list-style-type: none"> • update the Draft HGV Routing Plan to show the M25/A282 J1A. The plan is shown as Figure 3, within the Framework CTMP (APP-031) and will be submitted at Deadline 1.

3.3. MATTERS UNDER DISCUSSION

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

Table 2-2 Matters Under Discussion

Date	Form of Engagement	Details of Matters Under Discussion
9 th October 2024	Meeting	<p>The following matters remain under discussion following the meeting:</p> <ul style="list-style-type: none"> • The acceptability of the impact on the SRN (M25/A282 J1a) associated with construction of the Proposed Scheme; and • The Applicant will consider potential additional measures for inclusion within the Framework CTMP (APP-031) to incentivise travel outside peak periods, if appropriate, and confirm the position at Deadline 1.

3.4. MATTERS NOT AGREED

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

4. REFERENCES

- ¹ 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>
- ² 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>
- ³ Cory Environmental Holdings Limited. (2023). 'Preliminary Environmental Information Report: Cory Decarbonisation Project'. Available at: <https://corydecarbonisation.co.uk/document-library/>



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