

Our ref: NH/2406328

Application Ref:
EN010128-000246

Sent by email

Janice Burgess
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Tel: 0300 470 1055
26 November 2024

Dear Sirs,

Cory Decarbonisation Project Development Consent Order (DCO) EN010128 Planning Application Norman Road, Belvedere, London, DA17 6JY
SECTION 56 PLANNING ACT 2008: WRITTEN REPRESENTATION OF NATIONAL HIGHWAYS LIMITED.

NATIONAL HIGHWAYS LIMITED (“National Highways”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 as the highway authority, traffic authority and street authority for the Strategic Road Network (“SRN”). As such, National Highways are responsible for managing the SRN in accordance with the requirements of our statutory licence and in general conformity with the requirements of the Highways Act 1980, and to satisfy the reasonable requirements of road safety.

This is the Section 56 representation of National Highways provided in respect of Cory Environmental Holdings Limited’s (CEHL) (“Applicant”) Development Consent Order (“Order”) application which seeks powers to enable the construction and operation of a carbon capture plant, storage and marine export terminal off Norman Road, Belvedere, London. National Highways was consulted in respect of an earlier iteration of the proposal and responded to the consultation on 27 November 2023.

Following the initial public consultation, the proposal was updated as set out in the draft DCO. National Highways submitted our Relevant Representation response to this on 14 June 2024.

National Highways attended the Preliminary Meeting on 5 November 2024 and the Issue Specific Hearing 1 (ISH1) on 6 November 2024.

The comments from National Highways below reiterate and update the points included in our Relevant Representation and are based on the current DCO application.

National Highways has the following concerns about the DCO application:

1. National Highways has concerns regarding insufficient information presented within the Transport Assessment, relating to the development’s construction phase and its traffic impact on the SRN, specifically M25 (A282) J1a. This junction forms one of the most congested junctions on National Highways’ network.

Without further information from the Applicant, we are unable to accept that the construction of the proposals would not affect the safety, reliability and/or operation of the SRN (the tests set out in DfT Circular 01/2022 and NPPF para 115).

The Transport Assessment states that a peak workforce of approximately 1,000 staff will be required for construction of the Proposed Scheme, alongside 25 daily HGV deliveries (50 two-way movements). It is also noted that there are likely to be Abnormal Indivisible Loads (AILs) required for the construction of the Proposed Scheme.

The Transport Assessment identifies that during peak construction periods, approximately 230 staff vehicle trips in the weekday AM and PM peak periods would travel along the A206 Bob Dunn Way, which is the closest point to the SRN on the Local Road Network. It is therefore anticipated that a similar level of traffic would also impact on M25 (A282) J1a which forms part of the SRN. Additional HGV and AILs are also likely to impact on this same junction.

Since submission of our Relevant Representation, National Highways has been in discussions with the applicant's transport consultants regarding further assessment of the construction traffic impacts on the SRN, in particular, at M25 (A282) J1A. These discussions are ongoing and we are working towards an agreement on the content of the Framework Construction Traffic Management Plan (FCTMP) and an updated Statement of Common Ground (SoCG). At present, however, there is still the potential for significant ongoing impacts on the National Highways network, which we do not yet have sufficient information to understand.

The transport impacts of the proposed development should also be considered relative to national planning policies relevant to the SRN, particularly; DfT Planning Policy Paper, DfT Circular 01/2022, The Strategic Road Network and the Delivery of Sustainable Development; and the National Highways guidance document – Planning for the future; A guide to working with National Highways on Planning Matters.

2. A Framework Construction Traffic Management Plan (FCTMP) has been prepared and submitted with the DCO application, but it is acknowledged that a full CTMP will be prepared post-determination, once contractor(s) have been appointed, secured by a DCO requirement. This full CTMP is likely to be the means by which National Highways can better understand the traffic impacts of the proposals on the SRN and ensure that mitigation measures are identified if necessary.

The Applicant should provide certainty that a full CTMP and a Construction Workers' Travel Plan will be submitted to and agreed with National Highways prior to on-site works commencing. As a statutory consultee, National Highways should have consideration of these documents regarding the impacts on the SRN to ensure they adequately address National Highways' concerns.

3. National Highways seeks to make a change to the wording within Article 3 of the draft DCO (Revision C) to reflect the need to consult National Highways on matters that may have a significant impact on the SRN.

Construction traffic management plan 9.— (1) No part of the authorised development may commence until a construction traffic management plan (which must be substantially in accordance with the framework construction traffic management plan) for that part has been submitted to and approved by the relevant planning authority in consultation with the relevant highways authority and National Highways. National Highways will be content to update its position subject to the Applicant providing the required information and fully addressing all of the concerns set out above.

National Highways will attend DCO hearings relevant to the matters set out in this written representation, unless there has been prior agreement with the applicant and an agreed, signed SoCG has been produced.

National Highways reserves the right to produce additional observations or comments to the Examining Authority and for the inclusion of protective provisions in the Order for its benefit, should it be necessary, as the examination progresses.

National Highways requests that the Examining Authority treat National Highways as an Interested Party for the purposes of the Examination.

Your sincerely,

[REDACTED]

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Spatial Planner
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