

Cory Decarbonisation Project DCO

LB Bexley Deadline 2 Response

13th December 2024.

Contents

1. INTRODUCTION
2. UPDATE SINCE DEADLINE 1
3. COMMENTS ON CHANGE TO APPLICATION
4. COMMENTS ON DRAFT PLANNING OBLIGATIONS

INTRODUCTION

This document is being submitted in response to documents submitted by Cory at Deadline 1.

UPDATE SINCE DEADLINE 1

Since Deadline 1 the Council and Cory have been in discussion following the Council's submission of its Written Representation as well as its Local Impact Report.

Through discussions, an updated Statement of Common Ground will be submitted as part of this deadline. The updates to the Statement of Common Ground can be summarised as follows:

Historic Environment

- The Council agrees that the potential for significant impact on Lesnes Abbey has been considered in Table 3 of Appendix 9-1: Historic Environment Desk Based Assessment of the Environmental Statement (Volume 3) (APP-100) and that there is no requirement to do any further work in terms of Historic Environment.
- The controls set out within the draft DCO, both articles and requirements, in relation to historic environment, are agreed.

Townscape and Visual

- It is agreed that the design principle of grouping the tallest buildings of the CCF at the north of the site (grouping the tall buildings together and drawing scale down as you go south down Norman Road) is good planning as project mitigation.
- The Design Principles and Design Code is agreed.
- The Applicant confirms that no trees are proposed to be felled for the Proposed Scheme. Some lopping may be undertaken as part of the establishment measures to deliver the LaBARDS, this would be confirmed in the full LaBARDS approved by LBB, as would any proposals for new planting.
- The Outline LaBARDS is agreed.
- The controls set out within the draft DCO, both articles and requirements, in relation to Townscape and Visual (including Arboriculture) including good design, are agreed.

Socio-Economics

- It is agreed that jobs at Munster Joinery (UK) Ltd on Norman Road are limited to distribution, office and showroom; they are no different in skill level to those available at Iron Mountain, Lidl and ASDA. It is agreed that the Proposed Scheme will not lead to a downgrading in skills level.

- The Outline Skills and Employment Plan is agreed.
- As detailed in Section ID 3.10.5 of Appendix 4-2: Scoping Opinion Responses of the Environmental Statement (APP-076), a separate tourism economy assessment has not been included in Chapter 15: Socio-economics of the Environmental Statement (Volume 1) (APP-064) as those businesses affected are not tourism related businesses due to the industrial location of the Proposed Scheme. It is agreed that the impact on tourist sectors is likely to be negligible and a separate assessment is not required.
- The controls set out within the draft DCO, both articles and requirements, in relation to skills and employment, are agreed, including the Applicant's proposed amendment to requirement 15.

Landside Transport

- The framework CTMP is agreed.

Land use and alternatives

- It is agreed that there is no prescribed method for site assessment.
- It is agreed that it is appropriate to undertake a site assessment process on a proportionate basis, focussing on policy matters that can differentiate between options and the ability for the options considered to meet project objectives.
- It is agreed that Veridion Park is not a reasonable alternative.
- It is agreed that development of the Carbon Capture Facility on the Strategic Industrial Location (SIL) allocation (some 70% of the site) is policy compliant in land use terms.
- It is agreed that harm to the MOL, MSINC and Crossness LNR is limited to the loss of the East and Stable Paddocks (some 30% of the built development area of the CCF) and impact from the Flue Gas Ductwork.

Metropolitan Open Land

- It is agreed that a development has to be in MOL to affect the designation; consequently, it is only part of the Carbon Capture Facility within the MOL that does not comply with relevant development plan policy.

Draft DCO

- Article 15(3) of the draft DCO is agreed.
- Requirement 8 of the draft DCO is agreed.
- Requirements 15 and 25 of the draft DCO to be submitted by Cory at Deadline 2 is agreed.

COMMENTS ON CHANGES TO APPLICATION

With respect to the proposed changes to the application the Council does not object in principle to the amendments but would like to seek clarification on the following:

Air Quality

- 1) Whether the change in dredging duration could affect local air quality through additional marine vessel emissions.
- 2) If there would be a change in air quality impacts from any dredging through HGV movements resulting from transport and storage of dredged aggregates.

Marine Biodiversity

- 1) Clarify how changes affect the area and location of the dredge pocket and the accuracy of the current dataset within this area? Further assessment of benthic fauna and sediment type may be required.
- 2) Clarify how the change in dredging operation would affect the duration of impacts upon marine biodiversity receptors, particularly seasonal fish migrations and sensitive life stages?

Water Framework Directive

- 1) How would the change in the dredging operation and jetty piling affect the potential impacts upon WFD quality elements, particularly biological quality elements and Chemical/Physico-Chemical Quality Elements?

Climate Resilience.

- 1) Would changes in dredging volume further amplify riverbank erosion? Deepening dredging and lengthening jetty pilings may accelerate erosion along the dredged channel undermining nearby land stability. Dredging reduces the natural sediment buffer, which can heighten sensitivity to rising sea levels and storm surges.
- 2) Please clarify how future sea level rise and storm surges would be incorporated into the enlarged jetty piling design. Enlarged jetty pilings often mean expanded infrastructure, which can increase the surface area exposed to storm surges, wave action and other climate-related impacts. This exposure heightens the risk of damage to the port or nearby infrastructure during severe weather.

COMMENTS ON DRAFT PLANNING OBLIGATIONS

Discussions with Cory remain on-going.