



STATEMENT OF COMMON GROUND - DARTFORD BOROUGH COUNCIL: 8.1.30

DECARBONISATION

Cory Decarbonisation Project


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Signed		
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Date	10th December 2024	10 December 2024

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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. This SoCG has been prepared to respond to the request from the Examining Authority to prepare a SoGC between the Applicant and DBC as detailed in Annex F of the **Rule 6 Letter (PD-005)**. 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 DARTFORD BOROUGH COUNCIL

- 1.2.1. This SoCG has been prepared between Dartford Borough Council and the Applicant (jointly referred to as the Parties) in relation to the DCO Application. Hereafter Dartford Borough Council is referred to as 'DBC'.
- 1.2.2. The anticipated construction vehicle route for the Proposed Scheme falls within the administrative area of DBC. Whilst Kent County Council (KCC) are the local highway authority for the administrative area, DBC are still a relevant party with which to prepare a SoCG.
- 1.2.3. Advice and consultation responses by DBC 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, DBC 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 DBC 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 nd 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"> • Proposed traffic survey types and locations; • Proposed construction traffic routeing between the Site and Strategic Road Network (SRN); and • Proposed traffic survey timings.
26 th May 2023	Email	<p>Response from DBC to the email sent by the Applicant on 22nd May which:</p> <ul style="list-style-type: none"> • Noted DBC’s position as secondary tier authority, with Kent County Council (KCC) acting as primary local highway authority; and • Noted sensitivities surrounding the A2026 Burnham Road due to its residential nature and proximity of Dartford town centre which is readily impacted upon by traffic diverting from the SRN.
26 th May 2023	Scoping Opinion	<p>The Planning Inspectorate’s EIA Scoping Opinion⁴ contained comments from DBC (dated 15th May 2023). Those comments and the Applicant’s response are shown in Appendix 4-2: Scoping Opinion Response of the Environmental Statement (Volume 3) (APP-076).</p>

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
20 th October 2024	Email, with attached Memorandum	The Applicant provided an update on the Proposed Scheme following submission of PEIR ³ , whilst also detailing (through a supporting memorandum) the proposed methodology for the EIA/Transport Assessment (presented in Appendix 18-1: Transport Assessment (Volume 3) (APP-114)).
28 th November 2023	Section 42 Response Letter	<p>DBC's Section 42 Response made comments on the following topics of the PEIR³:</p> <ul style="list-style-type: none"> • Construction duration; • Construction traffic routeing; • Construction traffic (HGV) impact on the A206, A2026 and at the M25/A282 Junction 1a; • Construction traffic air quality emissions, including the need for both an Air Quality Positive Statement as well as an Air Quality Neutral Assessment; and • Scope of the proposed Transport Assessment. <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>
November 2023	Adequacy of Consultation Representation Proforma	DBC acknowledged that adequate consultation had been undertaken by the Applicant. DBC requested that the Applicant continues to engage with National Highways with regard to potential traffic impacts in the north of the borough including the M25/A282 Junction 1a.
12 th June 2024	Letter	<p>DBC submitted its Relevant Representation (RR) (RR-046), raising the following topics:</p> <ul style="list-style-type: none"> • Existing traffic congestion at the M25/A282 Junction 1a, along the A206 Bob Dunn Way and at Craymill Bridge; • Existing air quality issues and potential impacts on air quality associated with construction traffic from the Proposed Scheme; and

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<ul style="list-style-type: none"> The Applicant's Framework Construction Traffic Management Plan (CTMP) (APP-127) (Revision A). <p>The Applicant responded to the points raised in the RR (RR-046) within the Response to Relevant Representation Report (AS-043).</p>
9th August 2024	Email	<p>The Applicant contacted DBC to arrange a meeting to discuss the contents of DBC's RR (RR-046).</p>
1st October 2024	Email	<p>DBC was not able to attend the meeting held on 9th October 2024 with other highways authorities; consequently, the Applicant sent the following to DBC:</p> <ul style="list-style-type: none"> Revision B of the Framework CTMP (AS-031); Technical Note: Construction Worker Vehicle Trips 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); and A summary table outlining how Revision B of the Framework CTMP (AS-031) and the Technical Note responded to the comments within DBC's RR (RR-046).
21st October 2024	Email	<p>DBC confirmed that they had reviewed comments made by KCC on the 14th October 2024 regarding Revision B of the Framework CTMP (AS-031) and the Technical Note: Construction Worker Vehicle Trips (as issued by the Applicant on 1st October 2024) and had nothing further to add.</p>

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
15 th November 2024	Email	<p>The Applicant issued Revision C of the Framework CTMP (REP1-008) to DBC in response to feedback provided by KCC at the meeting on 9th October and the written comments provided on 14th October.</p> <p>The updates to the Framework CTMP (REP1-008) included:</p> <ul style="list-style-type: none"> • Extending the HGV routing plan to the M25/A282 Junction 1a; • Strengthening the measures to discourage car/van travel through the M25/A282 Junction 1a / Dartford Crossing in the peak travel periods and during incident periods; • Providing commitments to monitoring, including staff mode share surveys every 6 months; and • Replacement of the Census 2021 Journey to Work data with construction staff mode share data obtained from Riverside 2 surveys to provide the indicative FCTMP baseline data.
27 th November 2024	Email	<p>DBC acknowledged that Revision C of the Framework CTMP (REP1-008) and the previously issued Technical Note: Construction Worker Vehicle Trips adequately addressed all outstanding DBC concerns relating to construction movements.</p>

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 DBC 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 DBC’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 DBC and the Applicant (Cory).

Table 3-1 Matters Agreed

Date	Form of Engagement	Details of Matters Agreed
28 th November 2023	Section 42 Response Letter	<p>The Applicant and DBC are in agreement that there are areas of existing congestion in Dartford, including the A206 Bob Dunn Way and the M25/A282 Junction 1a.</p> <p>The Applicant and DBC agreed that the EIA should consider impacts on air quality in existing Air Quality Management Areas (AQMA). The assessment presented in Chapter 5: Air Quality of the Environmental Statement (Volume 1) (APP-054) accounts for the presence of AQMAs.</p>
12 th June 2024	Letter	<p>The Applicant and DBC are in agreement that:</p> <ul style="list-style-type: none"> • the traffic attraction from operation of the Proposed Scheme is likely to be low resulting in negligible impacts on the surrounding network, as concluded within Chapter 18: Landside Transport of the Environmental Statement (Volume 1) (APP-067) and the accompanying Appendix 18-1: Transport Assessment (Volume 3) (APP-114); • construction workers will not all arrive in a single peak hour, as assumed for the worst case assessment (provided within Chapter 18: Landside Transport of the Environmental Statement (Volume 1) (APP-067) and the accompanying Appendix 18-1: Transport Assessment (Volume 3) (APP-114)), but rather across a number of hours; and • HGVs will not route through Dartford town centre. A draft HGV routeing plan was shown as Figure 3 within Revision B of the Framework CTMP (AS-031).

Date	Form of Engagement	Details of Matters Agreed
28th November 2023	Section 42 Response Letter	DBC requested that both an Air Quality Positive Statement and an Air Quality Neutral Assessment are produced. These were presented as Appendix 5-4: Air Quality Positive Statement of the Environmental Statement (Volume 3) (APP-080) and Appendix A: Air Quality Neutral Assessment of the Response to Relevant Representation Report (AS-044) .
27th November 2024	Email	DBC confirmed Revision C of the Framework CTMP (REP1-008) and the previously issued Technical Note: Construction Worker Vehicle Trips adequately addressed all outstanding DBC concerns relating to construction movements.

3.3. MATTERS UNDER DISCUSSION

3.3.1. No matters remain that are Under Discussion between DBC and the Applicant.

3.4. MATTERS NOT AGREED

3.4.1. No matters remain that are Not Agreed between DBC 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/>
- ⁴ Planning Inspectorate. (2023). 'Environmental Impact Assessment Scoping Opinion: Cory Decarbonisation Project.' Available at: <https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010128/EN010128-000026-EN010128%20-%20Scoping%20Opinion.pdf>



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