



# STATEMENT OF COMMON GROUND - GREATER LONDON AUTHORITY: 8.1.2

**DECARBONISATION**

## **Cory Decarbonisation Project**

PINS Reference: EN010128

**January 2025**

**Revision A**

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<b>On behalf of</b>	Great London Authority	Cory Environmental Holdings Limited
<b>Date</b>		

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# 1. INTRODUCTION

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## 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 Department for Ministry for Housing Communities (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 GREATER LONDON AUTHORITY**

- 1.2.1. The Proposed Scheme falls within the administrative area of the Greater London Authority. It is therefore a relevant party with which to prepare a SoCG.
- 1.2.2. This SoCG addresses topics of interest to Greater London Authority and has been prepared between Greater London Authority and the Applicant (jointly referred to as the Parties) in relation to the DCO Application.
- 1.2.3. This SoCG does not deal with archaeological matters which are dealt with by the GLA's Archaeology Service, as those matters are the subject of a separate SoCG.

## **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, the Greater London Authority 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 Greater London Authority 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**

<b>Date</b>	<b>Form of Engagement</b>	<b>Summary of Matters Dealt with in Correspondence/ Meeting</b>
<b>29<sup>th</sup> January 2024</b>	Meeting	Meeting between the Applicant and the Greater London Authority, including Deputy Mayor for Environment and Energy.  The Applicant's presentation was to provide details of the Proposed Scheme design, progress and goals prior to the submission of the DCO application in Q2 of 2024.
<b>14<sup>th</sup> February 2024</b>	Letter and Email	Section 42 statutory consultation notice served again via three letters and by email. The Applicant decided that it was appropriate to contact the Greater London Authority again, in accordance with Part 5 of the PA2008, to invite them to give feedback on the project, and to ensure that the Greater London Authority had the full statutory period to do so, because no response had not been received from the Greater London Authority during statutory consultation.
<b>29<sup>th</sup> February 2024</b>	Section 42 Response Letter (email)	The Greater London Authority's Section 42 response letter made comments on the following topics of the PEIR <sup>ii</sup> : <ul style="list-style-type: none"> <li>• Alignment with the London Plan; and</li> <li>• Impacts on air quality, climate resilience and local nature sites and wildlife.</li> </ul>
<b>15<sup>th</sup> April 2024</b>	Email	Letter on behalf of the Applicant responding to the Greater London Authority consultation response.

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<p>The letter focuses on the key topics raised in the Greater London Authority consultation response dated 29/02/2024, including the following:</p> <ul style="list-style-type: none"> <li>● Loss of Metropolitan Open Land (MOL) and Crossness Local Nature Reserve (LNR);</li> <li>● Impacts on air quality, climate resilience and local nature sites and wildlife;</li> <li>● Biodiversity;</li> <li>● Flood Defence; and</li> <li>● Water Consumption.</li> </ul>
<b>16<sup>th</sup> April 2024</b>	Email	Email from the Applicant to Greater London Authority providing separate link to download all DCO documentation.
<b>28<sup>th</sup> May 2024</b>	Email	Email from the Applicant to Greater London Authority providing link to all DCO documentation published on the Planning Inspectorate website.
<b>14<sup>th</sup> June 2024</b>	Letter	<p>The Greater London Authority submitted their Relevant Representation (RR-077) for the application for a Development Consent Order for the Cory Decarbonisation Project. The following topics were covered in their documentation:</p> <ul style="list-style-type: none"> <li>● Net Zero and Decarbonisation;</li> <li>● London Plan Alignment;</li> <li>● Air Quality Impacts; and</li> <li>● Biodiversity Net Gain.</li> </ul>
<b>20<sup>th</sup> June 2024</b>	Email	Email from the Applicant to the Greater London Authority requesting a copy of their Relevant Representation response prior to the closing of the Section 56 notification period.



Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
<b>05<sup>th</sup> August 2024</b>	Email	The Applicant contacted the Greater London Authority offering a meeting to discuss their Relevant Representation response published by the Planning Inspectorate on the 14 <sup>th</sup> June 2024.
<b>22<sup>nd</sup> August 2024</b>	Email	The Greater London Authority responded to the Applicant's offer for a meeting by requesting details of specific topic areas that the Applicant would like to discuss with the Greater London Authority.
<b>30<sup>th</sup> October 2024</b>	Email	The Greater London Authority requested the Air Quality Neutrality assessment. The Applicant provided all available information via Planning Inspectorate link on the same date.
<b>8<sup>th</sup> November 2024</b>	Email	The Greater London Authority sought an addition to the SoCG regarding Air Quality Neutrality Assessment to cover building emissions.
<b>26<sup>th</sup> November 2024</b>	Written Representations at Deadline 1	The Greater London Authority raised matters regarding alignment to net zero, the London Plan, impacts on air quality and biodiversity net gain.
<b>10<sup>th</sup> December 2024</b>	Email	The Greater London Authority confirmed via email that no building emissions are included in the AQN assessment. The emissions associated with the energy used by any new office space or other building space should to be calculated and compared with the benchmark. Furthermore the Greater London Authority does not consider that the CO <sub>2</sub> capture would make up for these emissions as valid as CO <sub>2</sub> is not considered an ambient air pollutant and is not captured in the AQN policy, which aims to address the key pollutants PM <sub>2.5</sub> and NO <sub>2</sub> .

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		The Applicant is seeking to provide a response at Deadline 3.
17 <sup>th</sup> January 2025	Email	The Greater London Authority has confirmed its position on decarbonisation and requested an AQN assessment.

2.1.2. It is agreed Error! Reference source not found. is an accurate record of the key meetings, consultation undertaken between the Applicant and Greater London Authority in relation to the issues addressed in this SoCG as at the date of this SoCG.

## 3. ISSUES

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### 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 the Greater London Authority’s representation and therefore have not been considered in this document.

### 3.2. MATTERS AGREED

3.2.1. Error! Reference source not found. below details the matters Agreed between the Greater London Authority and the Applicant (Cory).

**Table 3-1 Matters Agreed**

Date	Form of Engagement	Details of Matters Agreed
14 <sup>th</sup> June 2024	Relevant Representation	<p><u>Ecological Designations</u></p> <p>It is agreed that the Proposed Scheme incorporates land that currently forms part of the Crossness Local Nature Reserve, Erith Marshes Site of Importance to Nature Conservation (SINC), River Thames and Tidal Tributaries SINC and Belvedere Dykes SINC.</p> <p><u>Air Quality</u></p> <p>The GLA requested that the Applicant submit an Air Quality Neutral (AQN) Assessment. The Applicant submitted the AQN Assessment within its Response to <b>Relevant Representations (RR-077)</b>.</p>

### 3.3. MATTERS UNDER DISCUSSION

3.3.1. **Table 3-2** below details the matters Under Discussion with Greater London Authority.

**Table 2-2 Matters Under Discussion**

Date	Form of Engagement	Details of Matters Under Discussion
14 <sup>th</sup> June 2024	Relevant Representation	<p><u>Biodiversity Net Gain</u></p> <p>In its Relevant Representation the Greater London Authority raised a number of technical queries in respect of the Applicant’s BNG Assessment. The Applicant has responded to these in its <b>Response to Relevant Representations (AS-043), Written Summaries of the Applicants Oral Submission at Compulsory Acquisition Hearing 1 (CAH1) and Appendices (REP1-028)</b> and in the <b>Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019)</b> and has offered to discuss these with the Greater London Authority, as these documents are yet to be reviewed by the GLA.</p> <p><u>Heat Networks</u></p> <p>In its Relevant Representation, the Greater London Authority emphasised the importance of delivering combined heat and power and a local heat network associated with the Riverside Campus.</p> <p>The Applicant is progressing the export of heat from Riverside 1 and Riverside in accordance with those existing consents. Requirement 25 of the draft DCO submitted for the Proposed Scheme addresses heat provision as relevant to this project.</p>
26 <sup>th</sup> November 2024	Written Representations at Deadline 1	The Greater London Authority reiterated its stance on waste process capacity in the wider context of alignment with Net Zero in its <b>Deadline 1 Written Representation (REP1-072)</b> .

Date	Form of Engagement	Details of Matters Under Discussion
		The Applicant provided a response in <b>Table 2-3-3 of Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019)</b>
<b>26<sup>th</sup> November 2024</b>	Written Representations at Deadline 1	The Greater London Authority raised matters relating to Metropolitan Open Land and Site Alternatives and the alignment with the London Plan. The Applicant provided a response in <b>Table 2-9-4 of Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019)</b> .
<b>26<sup>th</sup> November 2024</b>	Written Representations at Deadline 1	The Greater London Authority raised comments regarding the Air Quality Neutrality Assessment. The Applicant provided a response to these matters in <b>Table 2-3-3 of Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019)</b> .
<b>26<sup>th</sup> November 2024</b>	Written Representations at Deadline 1	The Greater London Authority raised ten points on Biodiversity Net Gain matters as part of their <b>Deadline 1 Written Representation (REP1-072)</b> . The Applicant provided a response to each Biodiversity Net Gain points in <b>Table 2-4-7 of Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019)</b> .
<b>10<sup>th</sup> December 2024</b>	Email	The Greater London Authority noted that no building emissions are included in the AQN assessment. The emissions associated with the energy used by any new office space or other building space needs to be calculated and compared with the benchmark, even if it's generated on site and from an energy from waste process. The Greater London Authority does not consider that the CO <sub>2</sub> capture would make up for these emissions as valid as CO <sub>2</sub> is not considered an ambient air pollutant and is not captured in the AQN policy, which aims to address the key pollutants PM <sub>2.5</sub> and NO <sub>2</sub> .

Date	Form of Engagement	Details of Matters Under Discussion
		The Applicant has provided a response to the Greater London Authority on this matter at Deadline 3. This comprises a revised version of the <b>Air Quality Neutral Statement (9.21)</b> . This includes building emissions as requested by the Greater London Authority. The GLA will review this and confirm its position to the Applicant.

### 3.4. MATTERS NOT AGREED

3.4.1. Table 3-3 below details the matters Not Agreed with Greater London Authority.

**Table 3-3 Matters Not Agreed**

Date	Form of Engagement	Details of Matters Under Discussion
14 <sup>th</sup> June 2024	Relevant Representation	<p><u>Principle of the Scheme</u></p> <p>The Greater London Authority has a target for London to reach Net Zero by 2030, in addition to a range of requirements and targets in the London Environment Strategy (LES). The Mayor acknowledges the important part industry can play in London’s decarbonisation and welcomes efforts from the EfW sector to reduce their emissions. However, it is also essential that EfW facilities make the most of capturing the offtake from energy production through combined heat and power and connecting this for use by, for example, housing. This should also be a priority for Cory in the development and management of the Riverside facilities regardless of plans for carbon capture and storage.</p> <p>The <b>Planning Statement (APP-040)</b> and <b>Public Benefit Report (APP-042)</b> report that the Proposed Scheme will deliver nearly 1% of the national Sixth Carbon</p>

Date	Form of Engagement	Details of Matters Under Discussion
		<p>Budget target (or 6% of UK waste emissions) and 17% of the London Environment Strategy Carbon Budget (2028-2032). (PBR, APP-042, paragraphs 5.2.6 to 5.2.11). Furthermore the Secretary of State for Energy Security and Net Zero confirmed (by way of letter dated 6 October 2022 (Planning Statement, APP-040, Appendix A) that <i>'The carbon capture element of the Proposed Project would provide and support the decarbonisation of energy from waste derived CO2 emissions in the UK, delivering over a million tonnes of CO savings per annum, and supporting the achievement of a full de-carbonised district heating network that crosses local authority areas. ...'</i></p> <p>The Applicant also notes that it has employed a Managing Director for Heat and is actively working toward the EfW facilities delivering heat/steam in addition to electricity. The Applicant confirms that the Proposed Scheme does not facilitate any increase in energy from waste incineration capacity.</p> <p>The Applicant also notes the report 'Analysis of a Net Zero 2030 Target for Greater London' which was published in 2022, presenting the work commissioned by the Greater London Authority.</p> <p>Page 22/23 of that report recognises the important role that EfW facilities have to play in supplying heat networks and goes on to recognise that adding carbon capture delivers the ability <i>'to generate electricity with net negative GHG emissions, which offers the opportunity to offset some of the remaining emissions from other sectors.'</i> Page 23 confirms that this aligns with the CCC's sixth Carbon Budget 'Balanced Pathway'.</p> <p><u>Metropolitan Open Land</u></p> <p>The Applicant and the Greater London Authority are in agreement that the Proposed Scheme is located on Metropolitan Open Land (MOL) and that MOL should be given the same status of protection as Green Belt in planning terms.</p>



Date	Form of Engagement	Details of Matters Under Discussion
		<p>The Greater London Authority does not agree with the very special circumstances presented by the Applicant. The Applicant's position on this matter is set out in the <b>Planning Statement (APP-040)</b>, <b>Project Benefits Report (APP-042)</b>, <b>Response to Relevant Representations (AS-043)</b>, <b>Written Summaries of the Applicants Oral Submission at Compulsory Acquisition Hearing 1 (CAH1)</b> and <b>Appendices (REP1-028)</b> and in the <b>Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019)</b>.</p> <p><u>Site Alternatives and Optioneering Process</u></p> <p>The Greater London Authority disagrees with the process and outcomes of the optioneering process as set out in the <b>Terrestrial Sites Alternatives Report (TSAR) (APP-125)</b>.</p> <p>The Applicant recognises there is no prescribed method for site assessment and considers the method set out in the <b>TSAR (APP-125)</b> is aligned with NPS EN-1 and appropriately addresses the mitigation hierarchy. The Applicant notes that further consideration of site alternatives are set out at <b>Appendix H</b> of its <b>Response to Relevant Representations (AS-044)</b> and would be pleased to discuss this work with the GLA, with further explanation provided at <b>ISH1 (REP1-025)</b> and in the <b>Written Summary of the Applicant's submissions</b> and its <b>Appendices (REP1-026)</b>.</p> <p><u>Impact on Crossness LNR</u></p> <p>The Greater London Authority is concerned about the significant adverse effects on protected sites, including the Crossness Local Nature Reserve and Site of Importance to Nature Conservation (SINC).</p>

Date	Form of Engagement	Details of Matters Under Discussion
		<p>The Applicant's response is given in its Deadline 2 submission (<b>REP2-019</b>), in summary that:</p> <p>The Applicant has provided a detailed assessment on the Likely Significant Effects for Crossness Local Nature Reserve and Site of Importance to Nature Conservation (SINC) within Sections 7.6 and 7.8 of <b>Chapter 7</b> of the <b>ES (APP-056)</b>. Section 7.6 of the <b>Planning Statement (APP-040)</b> defines the overall improvements for Crossness LNR and SINC and goes on to consider both the impacts and improvements together in the planning balance, concluding that the Proposed Scheme is compliant with local policy and the London Plan.</p> <p>Furthermore, it is noted that the Applicant's approach to the mitigation hierarchy is presented throughout the Application documents, not least the <b>Planning Statement (APP-040)</b> at section 4.7 and the Applicant's <b>Response to Relevant Representations (AS-043)</b>, <b>Written Summaries of the Applicants Oral Submission at Compulsory Acquisition Hearing 1 (CAH1)</b> and <b>Appendices (REP1-028)</b> and in the <b>Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019)</b>, particularly paragraphs 2.5.8 to 2.5.10. The mitigation hierarchy has been appropriately applied at all stages and throughout site optioneering, design evolution, and the identification of appropriate mitigation and compensation measures.</p>

## 4. REFERENCES

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- <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). 'Preliminary Environmental Information Report: Cory Decarbonisation Project'. Available at: <https://corydecarbonisation.co.uk/document-library/>



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