



**STATEMENT OF COMMON
GROUND – PORT OF
LONDON AUTHORITY:
8.1.4**

DECARBONISATION

Cory Decarbonisation Project
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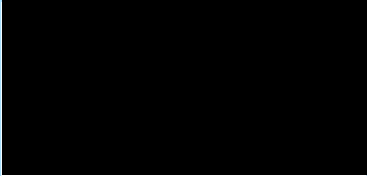

	Port of London Authority	Cory Environmental Holdings Limited (the Applicant)
Signed		
Printed Name	James Trimmer	Richard Wilkinson
Title	Director of Planning and Development	Project Director
On behalf of	Port of London Authority	Cory Environmental Holdings Limited
Date	17 January 2025	17 January 2025

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1. INTRODUCTION AND PURPOSE

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 SoCG aid 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 The Applicant Cory Environmental Holdings Limited (the Applicant). It accompanies the application for a DCO (the DCO Application) in relation to the Applicant’s 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’) for Energy Security and Net Zero (DESNZ).
- 1.1.6. The DCO, if granted, would authorise the construction, operation, maintenance and decommissioning of the Applicant’s Decarbonisation Project (the Proposed Scheme). The Proposed Scheme is to be located at Norman Road, Belvedere in the London Borough of Bexley (LBB) (National Grid Reference/NGR 549572,180512).
- 1.1.7. The Proposed Scheme is described in **Chapter 2: Site and the Proposed Scheme (Volume 1)** of the **Environmental Statement (ES) (Planning Inspectorate Reference ((APP-051))** and includes:

¹<https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>

- 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, together with associated capital and maintenance dredging;
- A Mitigation and Enhancement Area;
- Temporary Construction Compounds; and
- Utilities Connections and Site Access Works.

1.2. INTRODUCTION TO THE PORT OF LONDON AUTHORITY

- 1.2.1. This SoCG has been prepared between the Port of London Authority (PLA) and the Applicant (jointly referred to as the Parties) in relation to the Application.
- 1.2.2. The PLA is the statutory port and harbour authority for the tidal River Thames. The SoCG addresses topics of interest to the PLA.
- 1.2.3. The PLA have been consulted due to the Proposed Scheme having works and operations which are located within the River Thames and due to impacts from the Proposed Scheme's operational phase on the PLA's statutory duties.

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, Port of London Authority has no further comments to make at this point. It may have further or additional comments to make, particularly if further information about the Proposed Scheme becomes available.
- 1.3.3. The SoCG is a document that will evolve during the Examination stage and will conclude 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 the PLA in relation to the Proposed Scheme is outlined in Error! Reference source not found. below. There has been email correspondence between the Parties to discuss the sharing of information, arrangement of meetings and to share 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 Correspondence	Summary of Matters Dealt with in Correspondence/ Meeting
22/07/2022	Microsoft Teams Meeting	<u>General</u> : PLA Project Introduction Meeting
09/08/2022	Microsoft Teams Meeting	<u>Navigation</u> : Formal Preliminary Navigational Hazard Analysis (pNHA) consultation (Initial pNHA)
22/09/2022	Microsoft Teams Meeting	<u>Navigation</u> : pNHA Findings Workshop
15/03/2023	Microsoft Teams Meeting	<u>General</u> : Project update including jetty layout optimisation and various options for jetty positioning
29/03/2023	Microsoft Teams Meeting	<u>Navigation</u> : PLA Consultation (pNHA Revision) including navigation scope; key drivers for a change in the jetty location and discussion around pNRA work and Ship Bridge Simulations
24/04/2023 – 25/04/2023	Ship Bridge Simulations – In Person Meeting	<u>Navigation</u> : Ship bridge simulations for Options 2 and 3 for PLA pilots to test approach, berthing, and un-berthing at Proposed Jetty
16/05/2023	Letter from PLA	PLA Scoping Report Formal Response
31/05/2023	Microsoft Teams meeting	<u>Navigation</u> : Simulations and pNHA Findings Workshop

27/07/2023	Microsoft Teams meeting	<u>Land</u> : Land Assembly of Riverbed and Aviva Jetty
22/08/2023	Microsoft Teams meeting	<u>Navigation</u> : pNRA Initiation Meeting
09/11/2023	Microsoft Teams meeting	<u>Navigation</u> : pNRA Consultation Workshop to explore key themes and outcomes of the stakeholder consultation exercise alongside additional analysis
29/11/2023	Letter from PLA	PLA PEIR Formal Response
14/12/2023	Microsoft Teams Meeting	<u>Land</u> : Liaison meeting discussing the land and works arrangements between PLA and The Applicant.
29/01/2024 to 31/01/2024	Third Party Ship Bridge Simulations – In Person Meeting	Key Topic <u>Navigation</u> : Third Party Ship Bridge Simulations
22/02/2024	Microsoft Teams Meeting	<u>Navigation</u> : Organisation of a meeting to discuss incorporation of simulation findings into the updated pNRA document
22/02/2024	Microsoft Teams Meeting	<u>Land</u> : Terms for a long-lease, incorporation of protective provisions in the DCO and regulatory oversight related to the jetty
05/03/2024	Microsoft Teams Meeting	<u>General</u> : General update
29/05/2024	Microsoft Teams Meeting	<u>Land</u> : Resolving matters including lease terms and RLB
27/06/2024	Microsoft Teams Meeting	<u>General</u> : Meeting to discuss comments from PLA on DCO submission received on 30/05/2024 via email. Response provided by The Applicant on 17/06/24

21/08/2024	Microsoft Teams Meeting	<u>Navigation</u> : Updates on the latest version of the pNRA, and variations to the scheme that will impact the pNRA.
18/10/2024 & 24/10/2024	Email exchange	<u>Navigation</u> : PLA comments on revised pNRA included with the letter to PINS dated 25 th September 2024. The Applicant and WSP provided comments via email on 24 th October 2024
18/10/2024	Email exchange	<u>General</u> : Consultation on proposed change to the proposed scheme
September – November 2024	Calls and Email Exchanges	The Applicant and the PLA's lawyers have had a number of discussions to seek to resolve all DCO drafting matters.

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

3. ISSUES

3.1. TERMINOLOGY

3.1.1. In the tables in this section of this SoCG:

- “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 Interested Party’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 with the PLA.

Table 3-1 – Matters Agreed

Topic	Details of Matters Agreed
Principle of Development	The PLA supports, in-principle, the Proposed Scheme, both in terms of its projected impact on carbon emissions and the associated increase in the use of the River that would result from the operation of the Proposed Scheme
Draft DCO	Article 8. DCO Requirements save for Requirement 7 DCO Protective Provisions
Limits of Deviation	That the limits of deviation for Work No. 4B are now aligned to the pNRA assumptions.
Order Limits	The Order limits in the River are agreed on the basis of the Change the Applicant is bringing forward at Deadline 3 to remove temporary possession powers from the navigational channel. The PLA have requested that the Applicant also amend the limits of deviation of Work No. 4C to avoid the navigational channel and an existing campshed at its eastern edge. The Applicant’s position is that it requires the former to address any slumping that may occur as a result of dredging and for the placement of

Topic	Details of Matters Agreed
	plant/equipment to undertake dredging, and the latter for construction flexibility. It is therefore agreed that the impacts of this can be managed pursuant to the PLA's Protective Provisions.
Dredging Assumptions	Subject to the point around assumptions on the type of dredging to be undertaken discussed below, the PLA agrees that, although it has concerns that the dredging assumptions may require amendment at detailed design, it does not require changes to be made to the dredging assumptions in the ES.

3.3. MATTERS UNDER DISCUSSION

3.3.1. **Table 3-12** below details the matters Under Discussion with The Port of London Authority.

Table 3-2 – Matters Under Discussion

Topic	Details of Matters Under Discussion
Land	<p>The PLA is content with the protections against the DCO Land Powers in its Protective Provisions. Discussions are on-going with the Applicant to reach a voluntary agreement but the PLA agrees that this is not needed to be completed before the end of Examination for the PLA to consider that it is adequately protected.</p> <p>The PLA is considering the shape file provided by the Applicant in relation to plot sizes to consider if any further amends are required to the Book of Reference, following the amends made to the BoR by the Applicant at Deadline 2 which dealt with the other concerns previously raised by PLA.</p>
Navigation Risk Assessment	<p>The pNRA is still under discussion, with information being and being proposed to be shared between the parties in relation to:</p> <ul style="list-style-type: none"> • LCO2 matters; • passing distances for the proposed berth; • draught effects on varying tides; and • passing speeds for vessels in the Reach
Dredging	The PLA and the Applicant will be discussing their respective Deadline 3 submissions on assumptions made in respect of backhoe dredging vs dispersive dredging.

Topic	Details of Matters Under Discussion
Marine Environment	The PLA is considering the detailed BNG Metric calculations spreadsheet provided by the Applicant, and its Examination submissions on impacts to birds which roost on the BPS Jetty.
River Transport	The PLA and the Applicant are discussing wording in the CoCP in relation to the transport by river of project construction cargoes including Construction, Excavation and Demolition Waste (CEDW) and as a consequence whether the PLA needs to be consulted on the CoCP as a whole (and Requirement 7 of the DCO as a consequence).

3.4. **MATTERS NOT AGREED**

3.4.1. There are currently no matters Not Agreed with The Port of London Authority.



DECARBONISATION

10 Dominion Street
Floor 5
Moorgate, London
EC2M 2EF
Contact Tel: 020 7417 5200
Email: enquiries@corygroup.co.uk
corygroup.co.uk