



STATEMENT OF COMMON GROUND - NATIONAL HIGHWAYS: 8.1.31

DECARBONISATION

Cory Decarbonisation Project

PINS Reference: EN010128

January 2025

Revision B

QUALITY CONTROL

Document Reference		8.1.31			
Document Owner		Cory Environmental Holdings Limited			
Revision	Date	Comments	Author	Check	Approver
Revision A	22 nd October 2024	-	SH	JW	RW
Revision B	09 th January 2025	-	JH	SH	JW

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Date	15 January 2025	15 January 2025

1. INTRODUCTION.....	4
1.1. Purpose of the Statement of Common Ground	4
1.2. Introduction to National Highways.....	5
1.3. Statement of Common Ground Structure.....	5
2. RECORD OF ENGAGEMENT	6
3. ISSUES	10
3.1. Terminology	10
3.2. Matters Agreed.....	11
3.3. Matters Under Discussion	13
3.4. Matters Not Agreed	14
4. REFERENCES.....	15

TABLES

Table 2-1 Schedule of Meetings and Correspondence during the Pre-Application Stage.....	6
Table 3-1 Matters Agreed	11
Table 2-2 Matters Under Discussion	13

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 National Highways 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 NATIONAL HIGHWAYS

- 1.2.1. This SoCG has been prepared between National Highways and the Applicant (jointly referred to as the Parties) in relation to the DCO Application.
- 1.2.2. National Highways is a statutory consultee as prescribed under Section 42(1)(a) (duty to consult) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended).
- 1.2.3. Advice and consultation responses by National Highways 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, National Highways 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 National Highways 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 Pre-Application Stage

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
27 th November 2023	Section 42 Response Letter	<p>National Highways' Section 42 Response made comments on the following topics of the PEIR³:</p> <ul style="list-style-type: none"> • The location of the Proposed Scheme in relation to the Strategic Road Network (SRN). • Construction trips (vehicular, HGV and workforce) and the impact on the M25/A282 Junction 1a. • Production of a full Transport Assessment, construction phasing and possible mitigation measures. <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>
14 th June 2024	Letter	<p>National Highways submitted its Relevant Representation (RR) (RR-149), raising the following topics:</p> <ul style="list-style-type: none"> • Information within Appendix 18-1: Transport Assessment of the Environmental Statement (Volume 1) (APP-114). • Construction traffic impact at the M25/A282 Junction 1a.

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<ul style="list-style-type: none"> • The duration of the peak construction workforce traffic period within the potential options presented for the construction programmes. • The Framework Construction Traffic Management Plan (CTMP) (AS-031). • Wording within the Draft DCO (AS-046). <p>The Applicant responded to the points raised in the RR (RR-149) within the Response to Relevant Representation Report (AS-043).</p>
09th August 2024	Email	The Applicant contacted National Highways to arrange a meeting to discuss the contents of National Highway’s RR (RR-149) .
01st October 2024	Email	<p>Ahead of a meeting arranged for 09th October 2024, the Applicant sent the following to National Highways:</p> <ul style="list-style-type: none"> • Revision B of the Framework CTMP (APP-031); and • 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).
9th October 2024	Meeting	<p>A meeting attended by National Highways, the London Borough of Bexley and Kent County Council was held, during which the following was discussed:</p> <ul style="list-style-type: none"> • Key issues raised in the Relevant Representations from these parties; • Peak construction phase duration and predicted peak highway impact; and <ul style="list-style-type: none"> - Revision B of the Framework CTMP (APP-031) and matters regarding: - HGV routeing;

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<ul style="list-style-type: none"> - Contractor appointment; - Riverside 2 CTMP; - Impacts on the SRN; - Impacts on the Local Road Network (LRN); - SoCG; and - Non-material amendment.
18th October 2024	Email	National Highways provided written comments regarding Revision B of the Framework CTMP (APP-031) and the Technical Note: Construction Worker Vehicle Trips (as issued by the Applicant on 01 st October 2024).
15th November 2024	Email	<p>The Applicant issued Revision C of the Framework CTMP (REP1-008) in response to feedback provided by National Highways at the meeting on 09th October 2024 and the written comments provided on 18th October 2024.</p> <p>The updates to the Framework CTMP (APP-031) 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.

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
22 nd November 2024	Email	National Highways provided written comments on Revision C of the Framework CTMP (REP1-008) (as issued by the Applicant on 15 th November 2024). <ul style="list-style-type: none"> ● Riverside 2 construction staff survey data, car sharing targets and HGV and workforce distribution/assignment diagrams at the M25/A282 Junction 1a; ● Minimising workforce travel and HGV deliveries during peak hours; and ● Consultation on content of full CTMP and CWTP as a requirement of the Draft DCO.
26 th November 2024	Letter (Deadline 1)	National Highways submitted its Written Representation raising the following topics: <ul style="list-style-type: none"> ● Concerns regarding Appendix 18-1: Transport Assessment (Volume 3) (APP-114) relating to the Proposed Scheme’s construction phase regarding workforce and HGV transport during peak hours and associated effects on M25/A282 Junction 1a; and ● Consultation on content of full CTMP and CWTP and an associated amendment to Article 3 of the Draft DCO.A

2.1.2. It is agreed that **Table 2-1** is an accurate record of the key meetings, correspondence and consultation undertaken between the Applicant and National Highways 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 National Highways’ 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 National Highways and the Applicant.

Table 3-1 Matters Agreed

Date	Form of Engagement	Details of Matters Agreed
27 th November 2023	Section 42 Response Letter	<p>The Applicant and National Highways are in agreement with regards to the following:</p> <ul style="list-style-type: none"> • The approximate number of construction HGV trips and construction workforce peak trips generated by the Proposed Scheme. • A full Transport Assessment and full Environmental Statement will, and subsequently has been, submitted as part of the application for development consent.
14 th June	Letter	<p>The Applicant and National Highways are in agreement with regards to the following:</p> <ul style="list-style-type: none"> • The approximate number of construction HGV trips and construction workforce peak trips generated by the Proposed Scheme set out in Appendix 18-1: Transport Assessment (APP-114). • That a full CTMP, in accordance with the Framework CTMP (APP-031) will ensure that required measures are identified and implemented, if necessary. • The wording of DCO Requirements 9 and 24 within Revision B of the Draft DCO (AS-014).
22 nd November 2024	Email	<p>The Applicant and National Highways are in agreement with regards to the following:</p> <ul style="list-style-type: none"> • Draft HGV Routeing Plan (extended to show the M25/A282 Junction1a) included in Revision C of the Framework CTMP (REP1-008); and

Date	Form of Engagement	Details of Matters Agreed
		<ul style="list-style-type: none">Monitoring programme provided in Revision C of the Framework CTMP (REP1-008).

3.3. MATTERS UNDER DISCUSSION

3.3.1. **Table 3-2** below details the matters still under discussion with National Highways.

Table 2-2 Matters Under Discussion

Date	Form of Engagement	Details of Matters Under Discussion
18 th October 2024	Meeting	<p>The following matters remain under discussion in relation to the written comments provided by National Highway’s on Revision B of the Framework CTMP (AS-031):</p> <ul style="list-style-type: none"> • The acceptability of the impact on the SRN (M25/A282 Junction 1a) associated with construction of the Proposed Scheme; and • The Applicant will consider potential additional measures for inclusion within the Framework CTMP (APP-031) to incentivise travel outside peak periods, if appropriate and required.
22 nd November 2024	Email	<p>The following matters remain under discussion in relation to the written comments provided by National Highway’s on Revision C of the Framework CTMP (REP1-008):</p> <ul style="list-style-type: none"> • The need for comparative information on predicted construction worker trip attraction using two alternative sets of mode share data (Census 2021 and Riverside 2 survey data). • National Highways have requested the need for further technical work showing the predicted distribution/assignment of construction vehicle trips through the M25/A282 Junction 1a in order to assess the significance. • National Highways have requested further details on how the proposed car sharing target of two people per vehicle will be achieved, to be satisfied it represents a robust assessment.

Date	Form of Engagement	Details of Matters Under Discussion
		<ul style="list-style-type: none"> • National Highways have requested further details on Construction Workforce Travel Plan measures and commitments aimed at minimising peak travel by construction workforce. • Written commitment to restricting construction HGV movements during the peak hours using a booking system in a future update of the CTMP. <p>The Applicant will respond to these comments in a separate Technical Note and, if required, an update to the Framework CTMP (REP1-008).</p>

3.4. MATTERS NOT AGREED

3.4.1. No matters remain that are not agreed between National Highways 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/>



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