



STATEMENT OF COMMON GROUND - KENT COUNTY COUNCIL: 8.1.29

DECARBONISATION

Cory Decarbonisation Project

PINS Reference: EN010128

January 2025

Revision B

QUALITY CONTROL

Document Reference		8.1.29			
Document Owner		Cory Environmental Holdings Limited			
Revision	Date	Comments	Author	Check	Approver
Revision A	October 2024	-	DR	SH	JW
Revision B	January 2025	-	JH	SH	JW

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On behalf of	Kent County Council	Cory Environmental Holdings Limited
Date	17 th January 2025	17 January 2025

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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 SoCG between the Applicant and Kent County Council (KCC) 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 KENT COUNTY COUNCIL

- 1.2.1. This SoCG has been prepared between KCC and the Applicant (jointly referred to as the Parties) in relation to the DCO Application.
- 1.2.2. The anticipated construction vehicle route for the Proposed Scheme falls within the administrative area of Dartford Borough Council (DBC). KCC is the local highway authority for this administrative area and is therefore a relevant party with which to prepare a SoCG.
- 1.2.3. Advice and consultation responses by KCC 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, KCC 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 KCC 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
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.
25 th May 2023	Email	<p>Response from KCC, as Local Highway Authority for Kent, to the email sent by the Applicant on 22nd May 2023 which:</p> <ul style="list-style-type: none"> • Noted the area of Dartford around the SRN is heavily congested; and • Noted that Riverside 2 did not require modelling of the A2026 Burnham Road junction, nor the M25/A282 Junction 1a or Junction 1b as the level of predicted traffic generation did not warrant assessment. KCC agreed that if the level of traffic anticipated for the Proposed Scheme was to be similar to that anticipated for Riverside 2, then this assumption would likely to remain and therefore no traffic surveys would be required at these junctions. KCC noted evidence should be provided at the appropriate time to demonstrate this.

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<ul style="list-style-type: none"> Noted that the response provided by the Local Highway Authority was not an official Kent County Council response and should not be treated as such. The advice provided was based on the information provided by the Applicant (in the email of the 22nd May 2023) and the time to review and could therefore be subject to change in the future.
20 th October 2023	Email, with attached Memorandum	The Applicant provided an update on the Proposed Scheme following submission of PEIR ⁴ , 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)).
20 th November 2023	Email	<p>Response from KCC to the email sent by the Applicant on 20th October 2023 which:</p> <ul style="list-style-type: none"> Noted that the Transport Assessment (presented as Appendix 18-1: Transport Assessment (Volume 3)) should review the Kent Emerging Local Transport Plan 5: Turning the Curve Towards Net Zero 2023⁵ dated June 2023. Recommended the review of traffic assignment given the passage of time since the Riverside 2 assessment and the changes in travel patterns which have occurred in the interim. Noted that traffic data from the surveys should be provided to confirm that the assessment of traffic impact does not need to be extended further.
18 th October 2023	Email	The Applicant requested KCC supply Personal Injury Accident data for the most recent five-year period for the part of the landside transport Study Area maintained by KCC.
04 th April 2024	Adequacy of Consultation Representation	KCC had no comments on the adequacy of consultation by the Applicant.

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
14 th June 2024	Letter	<p>KCC submitted its Relevant Representation (RR) (RR-110), raising the following topics:</p> <ul style="list-style-type: none"> • Transportation of construction materials via river; • The Applicant’s traffic survey extent; • Distribution and assignment of construction vehicles onto the network; • Construction traffic impacts on the A206, A2026 and at the M25/A282 Junction 1a; • Appendix 18-1: Transport Assessment (Volume 3) (APP-114); and • The Framework Construction Traffic Management Plan (CTMP) (APP-127) (Revision A). <p>The Applicant responded to the points raised in the RR (RR-110) within the Response to Relevant Representation Report (AS-043).</p>
09 th August 2024	Email	<p>The Applicant contacted KCC to arrange a meeting to discuss the contents of KCC’s RR (RR-110).</p>
01 st October 2024	Email	<p>Ahead of a meeting arranged for 09th October 2024, the Applicant sent the following (within the virtual meeting invitation) to KCC:</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).

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
09 th October 2024	Meeting	<p>A meeting attended by National Highways, the London Borough of Bexley and KCC 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 anticipated highway impact; and • Revision B of the Framework CTMP (APP-031) and matters regarding: <ul style="list-style-type: none"> • HGV routing; • Contractor appointment; • Riverside 2 CTMP; • Impacts on the SRN; • Impacts on the Local Road Network (LRN); • SoCG; and • Non-material amendment.
14 th October 2024	Email	<p>KCC 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 01st October 2024 within the virtual meeting invitation for the 09th October 2024).</p>
15 th November 2024	Email	<p>The Applicant issued Revision C of the Framework CTMP (REP1-008) in response to feedback provided by KCC at the meeting on 09th October 2024 and the written comments provided on 14th 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;

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
		<ul style="list-style-type: none"> • 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.
28th November 2024	Email	KCC provided written comments regarding 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; • HGV routing enforcement and delivery timing; • Construction traffic monitoring; • Mitigation measures if targets are not met; and • Supporting flexible construction staff arrival and departure times.

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 KCC 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 KCC’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 KCC and the Applicant.

Table 3-1 Matters Agreed

Date	Form of Engagement	Details of Matters Agreed
25 th May 2023	Email	KCC agreed that if the level of construction traffic anticipated for the Proposed Scheme was to be similar to that anticipated for Riverside 2, then junction capacity modelling of the A2026 Burnham Road junction, the M25/A282 Junction 1a or Junction 1b was not required.
14 th June 2024	Letter	<p>The Applicant and KCC are in agreement with regard to the following:</p> <ul style="list-style-type: none"> • There are areas of existing congestion in Dartford, including the A206 Bob Dunn Way and the M25/A282 Junction 1a; • The traffic attraction from the operation phase 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); and • Future construction workers and employees are to be encouraged to travel by sustainable modes through the implementation of Workforce Travel Plans.
09 th October 2024	Meeting	KCC agreed that physical highway capacity improvements to the A206 Bob Dunn Way and the M25/A282 Junction 1a would not be required to mitigate the temporary impact of additional construction vehicle movements on the highway network thus negating the need for junction capacity assessment. It was agreed that the limited impact could be mitigated through the implementation of measures secured via the full CTMP (in accordance with the Framework CTMP (AS-31)).

Date	Form of Engagement	Details of Matters Agreed
14 th October 2024	Email	KCC agreed that, based on evidence of existing vehicular movements on Norman Road, that construction workers are unlikely to all arrive and depart the site in a single peak hour as assumed for the worst case assessment provided 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) , but rather across a number of hours.
28 th November 2024	Email	<p>Following the receipt of written comments in response to Revision C of the Framework CTMP (REP1-008), the following matters are agreed:</p> <ul style="list-style-type: none"> • Existing bus and rail services provide viable travel options for future construction staff based in Dartford to travel to and from the Site; • The application of Riverside 2 construction staff mode share data addresses the concerns raised with the use of 2021 Census Travel to Work data for Bexley to predict future construction worker travel modes; • The extended HGV routing plan (incorporating the M25/A282 Junction 1a); • The additional travel planning measures included in paragraphs 3.3.1, 3.37, 3.312, 3.4.7 and 3.4.10 to encourage future construction staff who may have to route through the Dartford Crossing area to travel outside the peaks, to encourage sustainable travel and car/van sharing, to communicate measures and local traffic conditions.

3.3. MATTERS UNDER DISCUSSION

3.3.1. **Table 3-2** below details the matters Under Discussion with KCC.

Table 3-2 Matters Under Discussion

Date	Form of Engagement	Details of Matters Under Discussion
14 th October 2024	Email	<p>The following matter remains under discussion in relation to the written comments provided by KCC on Revision B of the Framework CTMP (AS-031):</p> <ul style="list-style-type: none"> • Providing further security/measures that enable a flexible staff arrival and departure approach to be implemented by the Contractor(s) (once appointed) to ensure not all staff will arrive/depart in a single hour.
28 th November 2024	Email	<p>The following matters remain under discussion in relation to the written comments provided by KCC on Revision C of the Framework CTMP (REP1-008):</p> <ul style="list-style-type: none"> • The need for further detail on the Riverside 2 mode share survey data; • Implementation of a HGV delivery booking and tracking system; • Further information on additional measures if targets are not met; • The need for additional commitments to encourage contractors to adopt flexible working patterns to avoid peak travel times; and • A requirement for the monitoring period to cover peak construction activities. • KCC consider that Workforce Travels Surveys would not be appropriate to capture the workforce origins and travel routes, as the surveys may not be accurate, and the response rate may be low. • The Applicant will address these comments in a separate Technical Note and, if required, an update to the Framework CTMP (REP1-008).

3.4.1. **Table 3-3** below details the matters not agreed between KCC and the Applicant.

Table 3-3 Matters Not Agreed

Date	Form of Engagement	Details of Matters Under Discussion
28 th November 2024	Email	<p>The following matter is not agreed in relation to the written comments provided by KCC on Revision C of the Framework CTMP (REP1-008):</p> <ul style="list-style-type: none"> • Construction traffic monitoring requirements: KCC consider that off-site traffic counts are required (through the use of ATC and ANPR equipment on the A206) to monitor the number of vehicles routing to the Site via the A206. <p>The Applicant considers that the proposed monitoring methodology provided in Revision C of the Framework CTMP (REP1-008) are appropriate and proportionate to monitor the success of the proposed measures. The monitoring has been agreed with Dartford Borough Council and National Highways.</p>

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 Cory Environmental Holdings Limited. (2023). 'Preliminary Environmental Information Report: Cory Decarbonisation Project'. Available at: <https://corydecarbonisation.co.uk/document-library/>
- ⁵ Kent County Council. (2023). 'Turning the Curve Towards Net Zero'. Available at: <https://letstalk.kent.gov.uk/23735/widgets/70451/documents/52605>



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