



STATEMENT OF COMMON GROUND - NATURAL ENGLAND: 8.1.5

DECARBONISATION

Cory Decarbonisation Project

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SIGNATORIES



| | Natural England | Cory Environmental Holdings Limited (the Applicant) |
|---------------------|---|---|
| Signed |  |  |
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| Title | Senior Officer | Project Director |
| On behalf of | Natural England | Cory Environmental Holdings Limited |
| Date | 21/02/2025 | 21/02/2025 |

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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 Department for 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 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') for Energy Security and Net Zero (DESNZ).
- 1.1.6. The DCO, if granted, would authorise the construction, operation, maintenance and oil 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 (LBB) (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) (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 NATURAL ENGLAND

- 1.2.1. This SoCG has been prepared between Natural England and the Applicant (jointly referred to as 'the Parties') in relation to the DCO Application.
- 1.2.2. Natural England is interested in the Proposed Scheme in its capacity as the Statutory Nature Conservation Agency (SNCA) in England.
- 1.2.3. Natural England is a statutory body as prescribed under Section 42(1)(a) (duty to consult) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended). In its role as SNCA, Natural England is responsible for providing advice to development promoters and consultation responses on relevant ecology and landscape matters. Advice and consultation responses 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, engagement on the development of the Environmental Statement and Habitats Regulations Assessment and participation in the Examination process.
- 1.2.4. In addition, Natural England is responsible for providing statutory advice to the Planning Inspectorate on any Appropriate Assessment produced by the Planning Inspectorate, in accordance with Regulation 63(3) of the Conservation of Habitats and Species Regulations (2017, as amended)⁴. Natural England is also responsible for protected species licensing and the protection of animals, plants and habitats under the wildlife regulations, including the Wildlife and Countryside Act 1981 (as amended)⁵.

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, Natural England 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 Natural England in relation to the Proposed Scheme is outlined in **Table 2-1** 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 Pre-Application Stage

| Date | Form of Correspondence | Summary of Matters Dealt with in Correspondence/ Meeting |
|---------------------------------|------------------------|--|
| 26 th May 2023 | Scoping Opinion | The Planning Inspectorate's EIA Scoping Opinion ⁶ contained comments from Natural England. Those comments and the Applicant's response are shown in Appendix 4-2: Scoping Opinion Response (Volume 3) (Planning Inspectorate Reference APP-076) . |
| 19 th June 2023 | Email | Request for opening a dialogue with respect to the Proposed Scheme. A Habitats Regulations Assessment (HRA) Screening report was provided for comment. |
| 22 nd September 2023 | Meeting | Initial introductory consultation meeting to present the evolving Proposed Scheme and decide next steps in the consultation process. Natural England to provide a response on the HRA Screening Report following the meeting. A discussion on the overview of the construction works within the marine environment, including the loss of intertidal and subtidal habitat. Natural England did not provide any comments on this matter at the time. |

| Date | Form of Correspondence | Summary of Matters Dealt with in Correspondence/ Meeting |
|---------------------------------|-----------------------------|--|
| 29 th September 2023 | Email | In Natural England's HRA Screening Response, they agreed with the conclusion of the HRA screening <i>"that there is a potential likely significant effect on Epping Forest SAC and that an Appropriate Assessment should be carried out"</i> . |
| 12 th January 2024 | S42 Response Letter (email) | Natural England's Section 42 response letter made comments on the following topics of the PEIR ³ : <ul style="list-style-type: none"> • Statutory designated sites; • Protected and notable species; • Local sites and priority habitats and species; • Ancient woodland, ancient and veteran trees; • Soils and agricultural land quality; and • Environmental Enhancements. |
| 14 th June 2024 | Letter | Natural England submitted its Relevant Representation (RR) (RR-150) covering the following topics: <ul style="list-style-type: none"> • Internationally designated sites; • Nationally designated sites; • Protected species; • Biodiversity net gain; and • Other valuable and sensitive habitats and species, landscapes and access routes. |

| Date | Form of Correspondence | Summary of Matters Dealt with in Correspondence/ Meeting |
|----------------------------|------------------------|--|
| 15 th July 2024 | Email | <p>Informal comments received from the Natural England air quality specialist, which covered the following points:</p> <p>Chapter 5: Air Quality (Volume 1) of the ES (APP-054):</p> <ul style="list-style-type: none"> • Amines • Terminology • Epping Forest Special Areas of Conservation (SAC) • Roads Impact • From New backup power <p>Chapter 7: Terrestrial Biodiversity (Volume 1) of the ES (APP-056):</p> <p>Additional evidence is required to support the conclusion that the overall impact on the Inner Thames Marshes SSSI is negligible.</p> |
| 25 th July 2024 | Meeting | <p>A meeting held to discuss the development of the Applicant's response to Natural England's RR (RR-150). Key discussion points covered air quality, water voles, biodiversity net gain (BNG), habitat and species impacts, and open mosaic habitat. Natural England confirmed it would not be providing input on BNG or commenting on this component going forwards.</p> <p>Natural England's concerns included the following points, as provided in their RR (RR-150), further detail is provided regarding these points within Table 3-2 below:</p> |

| Date | Form of Correspondence | Summary of Matters Dealt with in Correspondence/ Meeting |
|---------------------------------------|------------------------|--|
| | | <p>Additional justification is required for NDep impacts to Ingrebourne Marshes and the Inner Thames Marshes Sites of Special Scientific Interest (SSSIs) (including accounting for vessels) to support the conclusions of submitted documents;</p> <p>Further information required on Epping Forest SAC in-combination assessment; and</p> <ul style="list-style-type: none"> Clarification on the deposition of amines in the assessment for impacts on designated sites. |
| 11th September 2024 | Email | The Applicant issued the meeting minutes and associated appendices, as discussed during the meeting on the 25 th July 2024. |
| 13th September 2024 | Email | The Applicant issued the draft SoCG to Natural England. |
| 3rd October 2024 | Emails (2) | <p>Natural England provided comments regarding the draft SoCG which were addressed as part of the SoCG (Revision B).</p> <p>Natural England provided a memorandum containing advice regarding air quality in response to appendices issued by the Applicant on the 11th September 2024. The Applicant is considering these comments and will provide an updated position in due course.</p> |
| 7th October 2024 | Email | The Applicant informed Natural England of the recent submission of update DCO Application documents (dated 25 th September 2024). |
| 8th October 2024 | Email | The Applicant issued the Water Vole Method Statement for the Proposed Scheme to Natural England for their review. |

| Date | Form of Correspondence | Summary of Matters Dealt with in Correspondence/ Meeting |
|--------------------------------|------------------------|---|
| 30 th October 2024 | Email | Natural England returned their review of the Water Vole Method Statement for the Proposed Scheme. |
| 19 th November 2024 | Email | The applicant issued an Ammonia Emissions Limits Technical Note to Natural England within Appendix B of the Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019) . The Ammonia Emissions Technical Note was prepared to address comments from Natural England on the impact of ammonia emissions to air quality from the Proposed Scheme. |
| 21 st November 2024 | Meeting | <p>A meeting was held to discuss Natural England's response to the Applicants Water Vole Method Statement. Key topics discussed included:</p> <ul style="list-style-type: none"> • Water vole bodies surveyed; • Scoping of impacts; • Capture, captive breeding and release; and • Habitat creation and enhancement. <p>The Applicant will be providing an updated revision of the Water Vole Method Statement prior to Deadline 3 of the Examination.</p> |
| 22 nd November 2024 | Email | The Applicant issued the meeting minutes as discussed on 21 st November 2024. |
| 26 th November 2024 | Email | <p>Natural England provided their Written Representation (REP1-038) which covered the following key topics:</p> <ul style="list-style-type: none"> • International designated sites. |

| Date | Form of Correspondence | Summary of Matters Dealt with in Correspondence/ Meeting |
|--------------------------------------|------------------------|--|
| | | <ul style="list-style-type: none"> Nationally designated sites. Protected species. Biodiversity net gain. Other valuable and sensitive habitats and species, landscapes and access routes; and Air quality. |
| 28th November 2024 | Email | Natural England provided confirmation the meeting minutes captured the discussion points and provided the Reason Statement Template for water voles. |
| 2nd December 2024 | Email | Natural England have not yet been able to review the Ammonia Emissions Technical note, a response will be provided by Natural England as soon as practicable. |
| 11th December 2024 | Email | The Applicant issued the draft SoCG Revision C to Natural England. |
| 13th December 2024 | Email | Natural England provided minor comments regarding the draft SoCG which were addressed as part Revision C. |
| 13th December 2024 | Email | <p>Natural England provided their Deadline 2 Submission (REP2-027) which covered the following key topics:</p> <ul style="list-style-type: none"> Natural England's comments on the Ammonia Emissions Limits Technical Note (issued by the Applicant on 19th November 2024); Natural England's comments on the change to the application; The Applicant's draft itinerary for site inspections; |

| Date | Form of Correspondence | Summary of Matters Dealt with in Correspondence/ Meeting |
|-------------------------------------|------------------------|--|
| | | <ul style="list-style-type: none"> Comments on draft planning obligation; and Any further Information requested by ExA under Rule 17 of the Examination Rules. <p>Natural England supports ExAs comments regarding the requirement for the Applicant to clarify if the Change Application would result in the stacks being closer to sensitive receptors and any potential changes to the Applicant's air quality that would result from the change.</p> <p>Natural England returned their review of the Ammonia Emissions Technical Note and raised concerns about the Applicant's conclusion of significant effects reported in Chapter 7: Terrestrial Biodiversity (Volume 1) of the Environment Statement (APP-056) in relation to inner Thames Marshes SSSI. Further details regarding these matters are provided in Table 3-2 below.</p> <p>The Applicant is responding to Natural England's comments within the Applicant's Response to Interested Parties' Deadline 2 Submissions (submitted at Deadline 3).</p> |
| 10th January 2025 | Email | The Applicant issued an updated version of the SoCG (Revision C) to Natural England ahead of the meeting on 13 th January. |
| 13th January 2025 | Meeting | <p>A meeting was held on the 13th January 2025, during which Natural England's comments on the Ammonia Emissions Technical Note were discussed.</p> <p>The topics that were discussed included:</p> |

| Date | Form of Correspondence | Summary of Matters Dealt with in Correspondence/ Meeting |
|-------------------------------|------------------------|--|
| | | <ul style="list-style-type: none"> The terminology and methodology used to assess the air quality impacts and the Process Contribution for the Proposed Scheme and impacts of emissions on ecological sites. The use of Emissions Limits Values as a mitigation measure and potential effects from changes in air quality on the Inner Thames Marshes SSSI. |
| 15 th January 2025 | Email | Following the meeting on 13 th January 2025, the Applicant issued a copy of the meeting minutes to Natural England. |
| 17 th January 2025 | Email Report | <p>Natural England returned a signed copy of the SoCG (Revision C) to the Applicant. The Applicant submitted the signed Natural England SoCG (REP3-017) into the Examination.</p> <p>The Applicant issued the Revised Water Vole Method Statement and associated Reasoned Statement and Application Form to Natural England.</p> |
| 24 th January 2025 | Email | <p>Following the meeting on 13th January 2025, Natural England submitted an advice note which provided an update on their position regarding air quality matters and set out a number of questions for the Applicant to address. The formal advice note covered the following key topics:</p> <ul style="list-style-type: none"> Assessment methodology; In combination assessment; and Emissions Limit Values (ELVs) as mitigation. |

| Date | Form of Correspondence | Summary of Matters Dealt with in Correspondence/ Meeting |
|--------------------------------|------------------------|--|
| 18 th February 2025 | Meeting | <p>A meeting was held on 18th February 2025, to discuss the points raised in Natural England's formal advice note on air quality.</p> <p>The key topics that were discussed included:</p> <ul style="list-style-type: none"> • Assessment methodology; • In-combination Assessment; and • Emissions Limit Values (ELV) and Mitigation. |
| 25 th February 2025 | Report | <p>The Applicant responded to the points raised in Natural England's air quality advice note within Appendix A of the Applicant's Response to Interested Parties' Deadline 3 Submissions (Document Reference 9.23).</p> |

- 2.1.2. It is agreed **Table 2-1** is an accurate record of the key meetings, consultation undertaken between the Applicant and Natural England 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 between Natural England and the Applicant.

Table 3-1 – Matters Agreed

| Date | Form of Correspondence | Topic | Details of Matters Agreed |
|---------------------------------|------------------------|-------|---|
| 29 th September 2023 | Email | HRA | HRA Screening Response from Natural England received and confirmed they agreed with the conclusion of the HRA Screening Report and the approach with only taking the Epping Forest SAC to Stage 2 (Appropriate Assessment). |

| Date | Form of Correspondence | Topic | Details of Matters Agreed |
|---|--|--|--|
| 14 th June 2024 | Natural England RR (RR-150) | Chapter 7: Terrestrial Biodiversity (Volume 1) of the Environmental Statement (APP-056) | Natural England are satisfied that the proposals have addressed the environmental issues within their statutory remit, noting that a protected species licence would be required for water voles. |
| 14 th June 2024 | Natural England RR (RR-150) | HRA | Natural England confirm they agree with the conclusions of Appendix 7-3 - Information to Inform a Habitat Regulations Assessment (Volume 3) of the ES (APP-090) as stated in their RR (RR-150) . Natural England agreed that the Proposed Scheme will have no alone adverse effect on the Epping Forest SAC. Matters related to in-combination impacts are still under discussion (see below). |
| 3 rd October 2024 and 26 th November 2024 | Email, Memorandum from Natural England | HRA | Further to the 14 th June 2024, Natural England further confirmed that they agree with the Applicant's conclusions of no adverse effects on integrity of the Epping Forest SAC as a result of the Proposed Scheme or in-combination with other plans and projects. |
| 18 th February 2025 | Meeting | Air Quality | Following the meeting on 18 th February, Natural England agreed with the following: |

| Date | Form of Correspondence | Topic | Details of Matters Agreed |
|------|------------------------|-------|--|
| | | | <ul style="list-style-type: none"> Riverside 1 and Riverside 2 are permitted to operate in the future, irrespective of whether permission for the Proposed Scheme is granted. Should permission for the Proposed Scheme be granted, future emissions from the existing Riverside 1 and Riverside 2 stacks to air will be diverted to the Carbon Capture Facility. These emissions, following treatment within the Carbon Capture Facility, will be emitted to air via the proposed Stack(s). The operation of the Carbon Capture Facility is dependent on Riverside 1 and Riverside 2 also being operational. |

3.3. MATTERS UNDER DISCUSSION

3.3.1. **Table 3-2** details the Matters Under Discussion between Natural England and the Applicant.

Table 3-2 – Matters Under Discussion

| Date | Form of Correspondence | Topic | Details of Matters Under Discussion |
|--|---|-----------------------------|---|
| 25 th July 2024 21 st November 2024 | Meeting | Water Vole Method Statement | <p>The Applicant aims to enable Natural England to be able to grant a Letter of No Impediment. In order to do this, Natural England will need to consider a method statement for water vole mitigation to confirm that sufficient methodologies will be employed, and that adequate data has been collected. The Applicant sent a revised version of the Water Vole Method Statement on the 17th January 2025, which Natural England is reviewing. The revised version addresses Natural England's comments as discussed during the meeting on the 22nd November 2024 and the revised version has been reflected in updates to the Outline LaBARDS (REP13-013).</p> <p>Natural England are likely to provide a response regarding the revised version of the Water Vole Method Statement on 25th February 2025.</p> |
| 3 rd October 2024 13 th December 2024 | Email, Memorandum from Natural England | Air Quality | <p>Natural England welcomed the additional information received from the Applicant on the 11th September 2024. With regard to the assessment of potential effects from nitrogen and ammonia deposition on the Inner Thames Marshes SSSI, Natural England</p> |

| Date | Form of Correspondence | Topic | Details of Matters Under Discussion |
|--|------------------------|-------|---|
| 13th January 2025 24th January 2025 18th February 2025 | Email, Meeting | | <p>welcomed the additional information and the Applicant's commitment to investigating a solution with the appointed technology provider to reduce emissions, but considers that further information is required before it can agree that no significant effects are caused to the SSSI. The Applicant provided further clarification that likely significant effects will not be caused to the SSSI, in the Ammonia Emissions Limits Technical Note.</p> <p>Natural England provided comments on the Ammonia Emissions Limits Technical Note as part of their comments for the deadline 2 submission. The Applicant met with Natural England on the 13th January to discuss the matters. The meeting allowed Natural England to better understand the methodology, terminology and approach to assessment of impacts.</p> <p>Natural England have since provided a written response setting out their position on air quality matters (24th January 2025) and had a meeting with the Applicant (18th February 2025). The following matters are still under discussion:</p> <ul style="list-style-type: none"> • Methodology used to assess air quality impacts; • In-combination assessment for Epping Forest SAC. • Whether the impact of the Proposed Scheme should be defined as: <ul style="list-style-type: none"> • The Proposed Scheme (Riverside 1 and Riverside 2 with the Carbon Capture Facility) minus the future baseline |

| Date | Form of Correspondence | Topic | Details of Matters Under Discussion |
|------|------------------------|-------|--|
| | | | <p>(Riverside 1 and Riverside 2 operating without the Carbon Capture Facility) (Applicant Position); or</p> <ul style="list-style-type: none"> The Proposed Scheme (Riverside 1 and Riverside 2 with the Carbon Capture Facility) minus the current baseline (Riverside 1 only operating without the Carbon Capture Facility), with Riverside 2 considered in the in-combination assessment (Natural England Position). |

3.4. MATTERS NOT AGREED

- 3.4.1. No matters remain that are Not Agreed between Natural England 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 UK Government. (2017). 'The Conservation of Habitats and Species Regulations 2017' (as amended).
- ⁵ HMSO (Her Majesty's Stationary Office). (1981). 'Wildlife and Countryside Act (as amended by the Countryside and Rights of Way Act 2000)'. HMSO, Norwich. Available at: <https://www.legislation.gov.uk/ukpga/2000/37/contents>
- ⁶ 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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