



STATEMENT OF COMMON GROUND - GREATER LONDON AUTHORITY: 8.1.2

DECARBONISATION

Cory Decarbonisation Project

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Title		
On behalf of	Great London Authority	Cory Environmental Holdings Limited
Date		

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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 (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. 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

Date	Form of Engagement	Summary of Matters Dealt with in Correspondence/ Meeting
29th January 2024	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.
14th February 2024	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.
29th February 2024	Section 42 Response Letter (email)	The Greater London Authority's Section 42 response letter made comments on the following topics of the PEIR ⁱⁱ : <ul style="list-style-type: none">• Alignment with the London Plan; and Impacts on air quality, climate resilience and local nature sites and wildlife.
15th April 2024	Email	Letter on behalf of the Applicant responding to the Greater London Authority consultation response.

		<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"> • Loss of Metropolitan Open Land (MOL) and Crossness Local Nature Reserve (LNR); Impacts on air quality, climate resilience and local nature sites and wildlife; • Biodiversity; • Flood Defence; and • Water Consumption.
16th April 2024	Email	Email from the Applicant to Greater London Authority providing separate link to download all DCO documentation.
28th May 2024	Email	Email from the Applicant to Greater London Authority providing link to all DCO documentation published on the Planning Inspectorate website.
14th June 2024	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"> • Net Zero and Decarbonisation; • London Plan Alignment; • Air Quality Impacts; and • Biodiversity Net Gain.
20th June 2024	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.
05th August 2024	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 th June 2024.

22nd August 2024	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.
30th October 2024	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.
8th November 2024	Email	The Greater London Authority sought an addition to the SoCG regarding Air Quality Neutrality Assessment to cover building emissions.
26th November 2024	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.
10th December 2024	Email	<p>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 CO₂ capture would make up for these emissions as valid as CO₂ is not considered an ambient air pollutant and is not captured in the AQN policy, which aims to address the key pollutants PM_{2.5} and NO₂.</p> <p>The Applicant is seeking to provide a response at Deadline 3.</p>
13 December 2024	Applicant's Response to Interested Parties' Deadline 1 Submissions	The Applicant provided a response to Interested Parties including the Greater London Authority at Deadline 2 (REP2-019). This included matters concerning emissions, terrestrial biodiversity and optioneering.

17 th January 2025	Email	The Greater London Authority has confirmed its position on decarbonisation and requested an AQN assessment.
17 th January 2025	Report	The Applicant submitted an updated Air Quality Neutral Statement (REP3-032) .

It is agreed **Table 2-1** 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

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. Table 3-1 below details the matters Agreed between the Greater London Authority and the Applicant (Cory).

Table 3-1 Matters Agreed

Topic	Details of Matters Agreed
Ecological Designations	<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>
Air Quality	<p>The GLA requested that the Applicant submit an Air Quality Neutral (AQN) Assessment. The Applicant submitted the AQN Assessment within its Response to Relevant Representations (RR-077).</p> <p>The Greater London Authority noted that no building emissions are included in the AQN assessment.</p> <p>The Applicant has provided a response to the Greater London Authority on this matter at Deadline 3. This comprises a revised version of the Air Quality Neutral Statement (REP3-032).</p> <p>It is agreed that an appropriate Air Quality Neutral Statement has been submitted, demonstrating that in both building and transport emissions the Proposed Scheme performs better than 'air quality neutral'.</p>
Metropolitan Open Land	<p>It is agreed that harm to the MOL, MSINC and Crossness LNR is limited to the loss of the East and Stable Paddocks (some 30% of the built development area of the Carbon Capture Facility) and impact from the Flue Gas Ductwork.</p> <p>Metropolitan Open Land designations within the London Borough of Bexley Plan (2023) and the London Plan (2021) are recognised to be slightly different. The Parties agree to use the MOL designation as set out in the Bexley Local Plan (2023).</p> <p>It is agreed that development has to be within MOL to affect the designation; consequently, it is only that part of the Carbon Capture Facility within the MOL that does not comply with relevant development plan policy. Some 70% of the Proposed Scheme has been situated on land designated as Strategically Industrial Land.</p>

Waste process capacity	It is agreed that the Proposed Scheme does not affect the consented level of residual waste throughput for the EfW facilities, Riverside 1 and Riverside 2.
Site Alternatives and Optioneering Process	<p>It is agreed that it is appropriate to undertake a site assessment process on a proportionate basis, focussing on policy matters that can differentiate between options and the ability for the options considered to meet project objectives. It is agreed that the method used for the terrestrial site assessment is appropriate.</p> <p>It is agreed that Veridion Park is not a reasonable alternative.</p>
Impact on Crossness LNR	<p>It is agreed that development of the Carbon Capture Facility on the Strategic Industrial Location (SIL) allocation (some 70% of the site) is policy compliant in land use terms.</p> <p>It is agreed that harm to Crossness LNR is limited to the loss of the East and Stable Paddocks (some 30% of the built development area of the CCF) and impact from the Flue Gas Ductwork.</p>
Heat Network	It is agreed that Bexley Local Plan Policies DP31 and SP14(c) and London Plan Policy SI3 are relevant to both this topic and the Land Use and Consideration of Alternatives. It is agreed that the Proposed Scheme appropriately makes provision for heat transfer within the Order limits. Consequently, the GLA supports the inclusion of infrastructure to facilitate the export of heat from the Proposed Scheme.
Climate Change and Greenhouse Gases	Both Parties organisations recognise 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> It is agreed that the removal of 1.3mtpa carbon dioxide from the atmosphere would be a positive outcome that would help to achieve the Mayor's policy for London to be a net zero city by 2030.
Biodiversity Net Gain	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 Response to Relevant Representations (AS-043), Written Summaries of the Applicants Oral Submission at

Compulsory Acquisition Hearing 1 (CAH1) and Appendices (REP1-028) and in the Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019).

The Greater London Authority raised ten points on Biodiversity Net Gain matters as part of their **Deadline 1 Written Representation (REP1-072)**. The Applicant provided a response to each Biodiversity Net Gain points in **Table 2-4-7 of Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019)**.

The BNG Metric for the Proposed Scheme is agreed.

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3.3. MATTERS UNDER DISCUSSION

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

Table 3-2 Matters Under Discussion

Topic	Details of Matters Under Discussion
Impact on Crossness LNR	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). The Applicant's response is given in its Deadline 2 submission (REP2-019).

3.4. MATTERS NOT AGREED

3.4.1. There are no matters not agreed.

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



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