



STATEMENT OF COMMON GROUND - NATIONAL HIGHWAYS: 8.1.31

DECARBONISATION

Cory Decarbonisation Project

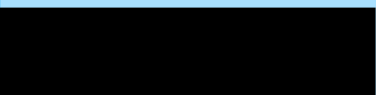


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Signed		
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On behalf of	National Highways	Cory Environmental Holdings Limited
Date	25 March 2025	25/03/2025

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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 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 ⑤ ④ ③ ② ①	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 ⑤④③②①④③⑤①	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>
09 th August 2024	Email	The Applicant contacted National Highways to arrange a meeting to discuss the contents of National Highway's RR (RR-149) .
01 st 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).
9 th 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:

Date	Form of ⑤④③②①④③⑤①	Summary of Matters Dealt with in Correspondence/ Meeting
		<ul style="list-style-type: none"> - HGV routeing; - 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 	Summary of Matters Dealt with in Correspondence/ Meeting
22 nd November 2024	Email	<p>National Highways provided written comments on Revision C of the Framework CTMP (REP1-008) (as issued by the Applicant on 15th November 2024).</p> <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)	<p>National Highways submitted its Written Representation raising the following topics:</p> <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
18 th February 2025	Email	<p>The Applicant issued Revision D of the Framework CTMP (REP4-010) and Technical Note – Response to Comments on the Framework CTMP in response to the written comments provided by National Highways on 26th November 2024.</p> <p>The Technical Note – Response to Comments on the Framework CTMP focussed on construction workforce travel mode share methodology; level of forecast construction workforce car sharing; contractor support for flexible working arrangements; construction workforce and HGV monitoring; and forecast construction vehicle impact on the M25 / A282 Junction 1a.</p>
17 th March 2025	Meeting	<p>A meeting was held between the Applicant and National Highways, during which Revision D of the Framework CTMP (REP4-010) and Technical Note – Response to Comments on</p>

Date	Form of ⑤④③②①④③⑤①	Summary of Matters Dealt with in Correspondence/ Meeting
		the Framework CTMP were discussed. Agreements were made regarding the “Matters Under Discussion” from Revision B of National Highways Statement of Common Ground (REP3-022) .
18th March 2025	Email	The Applicant issued Revision E of the Framework CTMP (to be submitted at Deadline 5) , responding to comments received by National Highways within the meeting held on the 17 th March between the Applicant and National Highways.

- 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).
17 th March 2025	Meeting	<p>The Applicant and National Highways are in agreement with regards to the following:</p> <ul style="list-style-type: none"> The forecast distribution/assignment of construction trips at the M25/A282 Junction 1a and the predicted level of impact is acceptable and will be validated as part of the full CTMP(s). The additional measures proposed in Revision D of the Framework CTMP (REP4-010), should targets not be met, are acceptable. Sufficient information has been provided regarding the Riverside 2 construction staff mode share survey data compared with the Census 2021 mode share data. Sufficient information has been provided demonstrating that the proposed construction staff car sharing target of two people per vehicle is appropriate, and National Highways are satisfied that a robust assessment has been undertaken. The traffic flow data presented for Norman Road provides a sufficient level of confidence that construction staff arrival and departure patterns will be distributed over a number of hours and that not all staff will arrive/depart in a single peak hour. The construction traffic monitoring requirements (including the potential for HGV booking systems) will be outlined within the full CTMP, which is to be developed once a Contractor(s) has been appointed. The monitoring requirements will be outlined within the full CTMP (which will be in substantial accordance with the Framework CTMP), and will be agreed with the London

Date	Form of Engagement	Details of Matters Agreed
		Borough of Bexley, in consultation with National Highways. Monitoring data and associated reports are to be sent directly to National Highways.

3.3. MATTERS UNDER DISCUSSION

- 3.3.1. No matters remain that are under discussion between National Highways and the Applicant.

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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