



# STATEMENT OF COMMON GROUND - GREATER LONDON AUTHORITY: 8.1.2

DECARBONISATION

## Cory Decarbonisation Project

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# 1. INTRODUCTION

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## 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)<sup>1</sup> 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 Guidance<sup>1</sup>. 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
<b>29<sup>th</sup> January 2024</b>	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.
<b>14<sup>th</sup> February 2024</b>	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.
<b>29<sup>th</sup> February 2024</b>	Section 42 Response Letter (email)	The Greater London Authority's Section 42 response letter made comments on the following topics of the PEIR <sup>ii</sup> : <ul style="list-style-type: none"><li>• Alignment with the London Plan; and</li></ul> Impacts on air quality, climate resilience and local nature sites and wildlife.
<b>15th April 2024</b>	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"> <li>• Loss of Metropolitan Open Land (MOL) and Crossness Local Nature Reserve (LNR); Impacts on air quality, climate resilience and local nature sites and wildlife;</li> <li>• Biodiversity;</li> <li>• Flood Defence; and</li> <li>• Water Consumption.</li> </ul>
<b>16<sup>th</sup> April 2024</b>	Email	Email from the Applicant to Greater London Authority providing separate link to download all DCO documentation.
<b>28<sup>th</sup> May 2024</b>	Email	Email from the Applicant to Greater London Authority providing link to all DCO documentation published on the Planning Inspectorate website.
<b>14<sup>th</sup> June 2024</b>	Letter	<p>The Greater London Authority submitted their <b>Relevant Representation (RR-077)</b> 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"> <li>• Net Zero and Decarbonisation;</li> <li>• London Plan Alignment;</li> <li>• Air Quality Impacts; and</li> <li>• Biodiversity Net Gain.</li> </ul>
<b>20<sup>th</sup> June 2024</b>	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.
<b>05<sup>th</sup> August 2024</b>	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 <sup>th</sup> June 2024.



<b>22<sup>nd</sup> August 2024</b>	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.
<b>30<sup>th</sup> October 2024</b>	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.
<b>8<sup>th</sup> November 2024</b>	Email	The Greater London Authority sought an addition to the SoCG regarding Air Quality Neutrality Assessment to cover building emissions.
<b>26<sup>th</sup> November 2024</b>	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.
<b>10<sup>th</sup> December 2024</b>	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 CO<sub>2</sub> capture would make up for these emissions as valid as CO<sub>2</sub> is not considered an ambient air pollutant and is not captured in the AQN policy, which aims to address the key pollutants PM<sub>2.5</sub> and NO<sub>2</sub>.</p> <p>The Applicant is seeking to provide a response at Deadline 3.</p>
<b>13 December 2024</b>	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 ( <b>REP2-019</b> ). This included matters concerning emissions, terrestrial biodiversity and optioneering.

<b>16<sup>th</sup> January 2025</b>	SoCG	The Applicant provided an update version (Revision A) of the Statement of Common ground for Greater London Authority's review prior to submission of draft at Deadline 3 ( <b>REP3-015</b> ).
<b>17<sup>th</sup> January 2025</b>	Email	Following the submission of the draft SoCG on the 16 <sup>th</sup> January, the Greater London Authority has confirmed its position on decarbonisation and requested an AQN assessment
<b>17<sup>th</sup> January 2025</b>	Report	The Applicant submitted an updated <b>Air Quality Neutral Statement (REP3-032)</b> .
<b>20<sup>th</sup> February 2025</b>	SoCG	The Applicant provided an update version (Revision B) of the Statement of Common Ground for Greater London Authority's review prior to submission of draft at Deadline 4 ( <b>REP4-017</b> ).
<b>14<sup>th</sup> March 2025</b>	SoCG	The Applicant provided an updated version (Revision C) of the Statement of Common Ground for Greater London Authority's review.
<b>3<sup>rd</sup> April 2025</b>	SoCG	The Greater London Authority provided feedback on the latest iteration of the SoCG held with the Applicant (Revision C).

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

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### 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
<b>Ecological Designations</b>	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.
<b>Air Quality</b>	<p>The GLA requested that the Applicant submit an Air Quality Neutral (AQN) Assessment. The Applicant submitted the AQN Assessment within its Response to <b>Relevant Representations (RR-077)</b>.</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 <b>Air Quality Neutral Statement (REP3-032)</b>.</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 meet 'air quality neutral' requirements.</p>
<b>Metropolitan Open Land</b>	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.
<b>Waste process capacity</b>	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.
<b>Heat Network</b>	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.
<b>Climate Change and Greenhouse Gases</b>	Both Parties organisations recognise the Secretary of State for Energy Security and Net Zero confirmed (by way of letter dated 6 October 2022 ( <b>Planning Statement, APP-040, Appendix A</b> ) 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 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.
<b>Biodiversity Net Gain</b>	<p>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 <b>Response to Relevant Representations (AS-043), Written Summaries of the Applicants Oral Submission at Compulsory Acquisition Hearing 1 (CAH1) and Appendices (REP1-028)</b> and in the <b>Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019)</b>.</p> <p>The Greater London Authority raised ten points on Biodiversity Net Gain matters as part of their <b>Deadline 1 Written Representation (REP1-072)</b>. The Applicant provided a response to each Biodiversity Net Gain points in <b>Table 2-4-7 of Applicant's Response to Interested Parties' Deadline 1 Submissions (REP2-019)</b>.</p>

### 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	<p>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).</p> <p>The Applicant's response is given in its Deadline 2 submission (<b>REP2-019</b>), it's position being in summary is:</p> <ul style="list-style-type: none"><li>• Loss of habitat within Erith Marshes MSINC that would result from the construction and operation of the Proposed Scheme is acknowledged in <b>Chapter 7: Terrestrial Biodiversity</b> of the <b>Environmental Statement (Volume 1) (APP-056)</b>.</li><li>• Compensation for Coastal Floodplain Grazing Marsh (CFGM) loss within the SINC will be undertaken within the Mitigation and Enhancement Area through enhancement of remaining CFGM, and reedbed within the SINC through a combination of reedbed creation within the Mitigation and Enhancement Area and BNG Opportunity Area, as reported in Section 7.11 of the chapter, and are demonstrated to outweigh the impacts on biodiversity.</li><li>• The majority of habitat loss occurs in areas with dual designation as Crossness LNR and Erith Marshes MSINC; thus compensatory habitat creation and enhancement serves the dual purposes of mitigating effects on both sites. As recognised in LBB LIR, the Proposed Scheme would incorporate NRF into Nature Reserve and so increase managed area by some 5-6ha.</li><li>• Creekside ditch (between the fields Borax South and Creekside) falls outside of Erith Marshes MSINC but it would not be true to suggest compensatory habitat creation and enhancement is not being advanced for this loss by the Proposed Scheme; reedbed creation and ditch creation/enhancement is being undertaken to mitigate effects of the Proposed Scheme on Erith Marshes MSINC.</li></ul>

	<ul style="list-style-type: none"> <li>• The proposed enhancement of habitats within the Mitigation and Enhancement Area would maintain the integrity of the Strategic Green Wildlife Corridor.</li> <li>• Notwithstanding the loss of habitat in Crossness LNR acknowledged by <b>Chapter 7: Terrestrial Biodiversity</b> of the <b>Environmental Statement (Volume 1) (APP-056)</b>, within the East Paddock which is not accessible and will be compensated for, the Proposed Scheme will not lead to a reduction in the amount of available open space accessible by the public within the Southeast London Green Chain.</li> </ul>
<b>Site Alternatives and Optioneering Process</b>	<p>It is agreed that it is appropriate to undertake a site assessment process, focussing on policy matters that can differentiate between options and the ability for the options considered to meet project objectives.</p> <p>The Parties will continue to discuss the outcomes of the Applicant's site optioneering process.</p>

### **3.4. MATTERS NOT AGREED**

3.4.1. There are no matters not agreed.



## 4. REFERENCES

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- <sup>1</sup> 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>
- <sup>2</sup> Cory Environmental Holdings Limited. (2023). 'Preliminary Environmental Information Report: Cory Decarbonisation Project'. Available at: <https://corydecarbonisation.co.uk/document-library/>



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