



# STATEMENT OF COMMONALITY: 9.5

**DECARBONISATION**

## **Cory Decarbonisation Project**

PINS Reference: EN010128

**May 2025**

**Revision H**

## QUALITY CONTROL

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Revision D	17 <sup>th</sup> January 2025	Deadline 3	PC/CV	LJ	DC
Revision E	25 <sup>th</sup> February 2025	Deadline 4	PC/CV	LJ	DC
Revision F	25 <sup>th</sup> March 2025	Deadline 5	PC/RB	LJ	AV
Revision G	29 <sup>th</sup> April 2025	Deadline 6	PC/RB	LJ	DC
Revision H	2 <sup>nd</sup> May 2025	Deadline 7	CV	LJ	DC

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# 1. INTRODUCTION

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## 1.1. PURPOSE OF THIS DOCUMENT

- 1.1.1. This Statement of Commonality has been prepared in order to provide the Examining Authority ('ExA') with the current position on Statements of Common Ground ('SoCG') between Cory Environmental Holdings Limited ('the Applicant') and Interested Parties in relation to the proposed Cory Decarbonisation Project in Bexley, London (the 'Proposed Scheme').
- 1.1.2. It reports on the SoCG that have been submitted during pre-Examination and is a report that has been updated as SoCG throughout the Examination.
- 1.1.3. The **Rule 8 Letter (PD-006)** requires the submission of the SoCG as requested by the ExA and a Statement of Commonality is requested at deadlines 1, 3, 4, 5 as required. Final versions of each are to be submitted by Deadline 7 (2nd May 2025), which is provided for in this document and its accompanying submissions.
- 1.1.4. In this Deadline 7 submission, the Applicant has also set out the position with each party with whom a final SoCG has not been reached.

## 1.2. STRUCTURE OF THIS DOCUMENT

- 1.2.1. The remainder of this document is structured as follows:
  - Section 2 sets out the status of the SoCG requested by the ExA.
  - Section 3 sets out the commonality between the SoCG and a summary of the current position.

## 2. LIST OF STATEMENTS OF COMMON GROUND

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### 2.1. LIST OF STATEMENTS OF COMMON GROUND

- 2.1.1. In accordance with the guidance published by the Ministry of Housing, Communities and Local Government<sup>1</sup>, the Applicant has prepared SoCGs with a number of Interested Parties.
- 2.1.2. The SoCGs identify matters on which the Parties agree (meaning the Applicant and the third party with whom the SoCG is drafted), what matters remain under discussion and what matters are confirmed to be not agreed.
- 2.1.3. **Table 2-1** provides a list of the SoCGs that are in place.
- 2.1.4. Document reference numbers 8.1.8, 8.1.10, 8.1.20, and 8.1.25 are not in use at this time.

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<sup>1</sup> Ministry of Housing, Communities and Local Government. Planning Act 2008: Examination Stage for Nationally Significant Infrastructure Project, 2024

**Table 2-1: List of SoCGs at Deadline 7, 2nd May 2025**

Document Reference Number	Interested Party	Status	Submitted at this Deadline?
8.1.1	London Borough of Bexley (LBB)	<b>Rev F (AS-096)</b> submitted with Applicant's update of 16 April 2025. Agreed and signed on 16 April 2025.	No
8.1.2	Greater London Authority (GLA)	<b>Rev C</b> submitted at Deadline 7. Agreed and signed on 1 May 2025	Yes
8.1.3	Environment Agency (EA)	<b>Rev D (REP6-034)</b> submitted at Deadline 6. Agreed and signed on 29 April 2025.	No
8.1.4	Port of London Authority (PLA)	<b>Rev B (AS-097)</b> submitted with Applicant's update of 16 April 2025. Agreed and signed on 7 April 2025.	No
8.1.5	Natural England (NE)	<b>Rev F (REP6-025)</b> submitted at Deadline 6. Agreed and signed on 28 April 2025.  In light of the Rule 8 letter asking for a summary of matters not agreed, the Applicant highlights that within this SoCG, there is one area of disagreement. Both Natural England and the Applicant agree with the outcomes and finding of <b>Chapter 5: Air Quality</b> of the <b>Environmental</b>	No

Document Reference Number	Interested Party	Status	Submitted at this Deadline?
		<b>Statement (Volume 1) (APP-054).</b> However there is a minor disagreement on terminology of the wording for baseline and future baseline.	
8.1.6	Friends of Crossness Nature Reserve (FoCNR)	<b>Rev D (REP3-018)</b> submitted at Deadline 3. Agreed and signed on 8 January 2025.	No
8.1.7	Marine Management Organisation (MMO)	<b>Rev E (REP6-036)</b> submitted at Deadline 6. Agreed and signed on 25 April 2025.	No
8.1.9	Greater London Archaeology Advisory Service	<b>Rev A (AS-041)</b> Agreed and signed on 6 September 2024.	No
8.1.11	Historic England	<b>Rev A (AS-032)</b> Agreed and signed on 6 September 2024.	No
8.1.12	Iron Mountain	<b>Rev B</b> submitted at Deadline 7. Agreed and signed on 2 May 2025	Yes
8.1.22	Lidl	<b>Rev C (REP4-021)</b> submitted at Deadline 4. Agreed and signed on 19 February 2025. <i>Note: although there are some formatting discrepancies in the signed version submitted, these do not affect the substance of the SoCG.</i>	No
8.1.23	Alaska RE	<b>Rev A (REP4-022)</b> submitted at Deadline 4.	No

Document Reference Number	Interested Party	Status	Submitted at this Deadline?
		Agreed and signed on 14 February 2025. <i>Note: although there are some formatting discrepancies in the signed version submitted, these do not affect the substance of the SoCG.</i>	
8.1.24	Percy Anderson	<b>Rev A (REP3-020)</b> submitted at Deadline 3. Agreed and signed on 8 January 2025 to complete the SoCG. <i>Note: this is marked as Rev D which is incorrect and for internal correspondence only.</i>	No
8.1.26	Save Crossness Nature Reserve (SCNR)	<b>Rev D (REP3-021)</b> submitted at Deadline 3. Agreed and signed on 9 January 2025.	No
8.1.27	Royal Society of Protection of Birds (RSPB)	RSPB confirmed by email to ExA (on 17 October 2024) that it will not prepare a SoCG and will not engage further with the Examination.  Confirmed by ExA in Rule 8 letter (PD-006) RSPB SoCG is no longer required.	No
8.1.28	Buglife	<b>Rev B (REP2-012)</b> submitted at Deadline 2. Agreed and signed 13 December 2024.	No
8.1.29	Kent County Council (KCC)	<b>Rev C (REP5-020)</b> submitted at Deadline 5.	No



Document Reference Number	Interested Party	Status	Submitted at this Deadline?
		Agreed and signed on 25 March 2025	
8.1.30	Dartford Borough Council (DBC)	<b>Rev B (REP2-013)</b> submitted at Deadline 2. Agreed and signed on 10 December 2024.	No
8.1.31	National Highways	<b>Rev C (REP5-022)</b> submitted at Deadline 5 Agreed and signed on 18 March 2025.	No

## 2.2. LIST OF SOCGS WHICH COULD NOT BE FINALISED

2.2.1. During the Examination period the Applicant has been in engagement with multiple organisations with which an agreed SoCG has not been reached. The position with these parties is set out below:

- ASDA. SoCG (8.1.13) Rev A (PDA-003) is with ASDA for review. There are no specific matters of disagreement in the draft SoCG. The Applicant notes it has agreed and signed a SoCG with Alaska RE (the freeholder and ASDA's landlord) (**REP4-022**).
- Thames Water Utilities Ltd (TWUL). SoCG (8.1.14) Rev A (**AS-081**) submitted as a mutually acceptable draft on 22 January 2025 however no signed version is secured. The Parties' respective positions in respect of the Matters Under Discussion in that SoCG are set out in their respective Closing Statements submitted at Deadline 7.
- Peabody Trust and Tilfen Land Ltd (together referred to as Peabody). SoCG (8.1.15) Rev A (**REP1-017**) submitted as a draft with the agreement of Peabody at Deadline 1. The Parties have agreed a joint position statement at the end of Examination which deals with the points 'under discussion' in the SoCG (and from the Applicant's perspective is set out in its Closing Statement). As at the time of the Applicant's document submission for Deadline 7, the parties were discussing a potential update to the SoCG additional to that position statement. If that is agreed, it will form a separate submission prior to the end of Examination.
- Landsul Limited and Munster Joinery (UK) Ltd (SoCG 8.1.16). Further to the chronology of the SoCG set out in the Applicant's response to the Rule 17 letter (**AS-077**), its Follow-Up (**AS-083**) and the discussions at CAH2 and ISH2, the Applicant considered that a SoCG would be of limited value to the Examination, as both parties' positions are clear and there is very limited agreement between the parties.
- Creek Side Developments (UK) Ltd. The Applicant issued draft SoCGs (8.1.17) to review and comment following the Compulsory Acquisition Hearing on 11th February 2025 (CAH2). No response was received during Examination.
- Seamus Gannon. The Applicant has issued draft SoCGs (8.1.18) to review and comment following the Compulsory Acquisition Hearing on 11th February 2025 (CAH2). No response was received during Examination.
- UK Power Networks (UKPN). SoCG (8.1.17) Rev A (**PDA-005**) submitted as a draft at Procedural Deadline A. The Applicant has enquired with UKPN on the completion of the SoCG, without substantive response. However, the Applicant notes that UKPN has not put forward any amendments to its

protective provisions and the parties are progressions discussions on a side agreement, which should abrogate the need for a SoCG.

- Aviva Life & Pensions UK Limited (Aviva). SoCG (8.1.18) Rev B (**PDA-006**) submitted as a draft at Procedural Deadline A. The Applicant notes that it has been discussing updates to the form of SoCG to account for subsequent discussions between the Applicant and Aviva and its representatives following Procedural Deadline A, but these have not yet been agreed. However, none of these updates are considered to be matters of disagreement.
- Southern Gas Networks (SGN). The Applicant offered to work towards agreeing a SoCG with SGN. The offer was not taken but has been superseded by the fact that the Applicant and SGN are agreed on SGN's protective provisions (as reported in the Land Rights Tracker at Deadline 5 (**REP5-041**)), and the parties have agreed a side agreement between them.
- Jay Anderson has been offered a SoCG, which did not contain any matters of disagreement (referring instead to several matters under discussion), but Jay Anderson explained in February 2025 that she does not wish to agree a SoCG.

### 3. COMMONALITY

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#### 3.1. SUMMARY

- 3.1.1. As requested by the ExA in the Rule 8 Letter (**PD-006**), this section of the document provides a summary of the principal issues covered in the SoCG and demonstrates where there is commonality in the topics or matters being discussed with the various parties.
- 3.1.2. **Table 3-1** presents the topics covered within the various SoCG and shows how these are relevant to each party and the current position for each topic. This reflects the agreed SoCGs as at Deadline 7, using a RAG (red, amber, green) system as shown in **Figure 3-1**. It will be updated as the Examination progresses.

**Figure 3-1: RAG system used for matters within the SoCG**

	Matter agreed
	Matters under discussion
	Matter not agreed

Table 3-2: Principal Issues Covered in the Statements of Common Ground

SoCG Party	Planning Policy	Draft DCO (Including Protected Provisions)	Consideration of Site Alternatives	EIA Methodology	Air Quality	Noise and Vibration	Terrestrial Biodiversity	Marine Biodiversity	Historic Environment	Townscape and Visual	Water Environment and Flood Risk	Climate Resilience	Greenhouse Gases	Population Health and land Use	Socio-Economics	Materials and Waste	Ground Conditions and Soils	Landside Transport	Marine Navigation	Major Accidents and Disasters	Cumulative Effects
8.1.1 London Borough of Bexley																					
8.1.2 Greater London Authority																					
8.1.3 Environment Agency																					
8.1.4 Port of London Authority																					
8.1.5 Natural England																					
8.1.6 Friends of Crossness Nature Reserve																					
8.1.7 Marine Maritime Organisation																					
8.1.9 Greater London Archaeology Advisory Service																					
8.1.11 Historic England																					
8.1.12 Iron Mountain																					
8.1.23 Alaska RE																					
8.1.24 Percy Anderson																					
8.1.26 Save Crossness Nature Reserve																					
8.1.28 Buglife																					
8.1.29 Kent County Council																					
8.1.30 Dartford Borough Council																					
8.1.31 National Highways																					



## DECARBONISATION

10 Dominion Street  
Floor 5  
Moorgate, London  
EC2M 2EF  
Contact Tel: 020 7417 5200  
Email: [enquiries@corygroup.co.uk](mailto:enquiries@corygroup.co.uk)  
**[corygroup.co.uk](http://corygroup.co.uk)**