



**DECARBONISATION**

# **OFF-SITE ECOLOGICAL REQUIREMENT DELIVERY OPTIONS**

**Cory Decarbonisation Project**

PINS Reference: EN010128

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## FIGURE

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Reproduction of Outline LaBARDS Figure 19 – Indicative configuration of habitats within the CCF, incorporating required Open Mosaic Habitat and reedbed

Figure 1 Open Mosaic Habitat Off-Site Delivery Options

Figure 2 Reedbed and Other Neutral Grassland Off-Site BNG Delivery Options

## TABLE

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Table 1 Open Mosaic Habitat Off-Site Delivery Options

Table 2 Reedbed and Other Neutral Grassland Off-Site BNG Delivery Options

## 1.1. BACKGROUND

- 1.1.1. In April 2024, the application for a Development Consent Order (DCO) for the Cory Decarbonisation Project was accepted for examination. The Proposed Scheme, confirmed to be a project of national significance in October 2022, comprises the following main components:
- a Carbon Capture Facility, comprising up to two plants designed to capture some 1.5 million tonnes of carbon dioxide (CO<sub>2</sub>) per annum;
  - a proposed new Jetty, extending into the Thames to facilitate the onward transfer of the captured CO<sub>2</sub>;
  - the Mitigation and Enhancement Area, designed both to enhance biodiversity and to improve public access to outdoor space;
  - three temporary construction compounds; and
  - connections to utilities and provision of site access works.
- 1.1.2. Throughout the pre-application and Examination process, the Applicant has committed, notwithstanding that it is not a statutory requirement for DCO projects at this time, to delivering 10% Biodiversity Net Gain ('**BNG**') as well as the provision of compensation for the loss of open mosaic habitat on previously developed land ('**OMH**'). This work has been informed by calculations undertaken using the statutory BNG Metric, as reported in **Appendix 7-1 to the Environmental Statement (Volume 3) (APP-088)** (the '**BNG Report**').
- 1.1.3. Through this work, the Applicant identified that to meet its terrestrial<sup>1</sup> BNG and OMH requirements, off-site habitat creation (i.e. outside of the Order limits) would be needed. The Proposed Scheme's Statutory Metric indicates the minimum amount of Biodiversity Units ('**BU**') needed to be delivered off-site to meet in full the terrestrial BNG and compensation requirements, including the Trading Rules, with these being:
- Reedbed, creation to Moderate condition over 0.21ha, or 1.51 BU;
  - Open Mosaic Habitat, creation to Moderate condition over 0.88ha, or 6.48 BU; and
  - Other Neutral Grassland ('**ONG**'), enhancement from Poor to Moderate condition, over 7.70ha, comprising an increase of 22.08 BU.
- 1.1.4. For the purpose of this report, these requirements are termed the 'Off-Site Ecological Requirements'.
- 1.1.5. In its application, the Applicant explained how it had identified an opportunity area ('**the BNG Opportunity Area**') to meet these requirements, being the Thamesmead Golf Course, and that it was negotiating the terms of use of that land with Peabody Trust

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<sup>1</sup> Note, this report does not deal with matters in relation to the intertidal environment which are dealt with pursuant to Requirement 14 of the draft DCO.

(and its related company Tilfen Limited). It also explained that these discussions were taking place alongside Cory also considering alternative options if Thamesmead Golf Course was unable to be used.

- 1.1.6. Following the close of Examination, the Applicant has continued those negotiations with Peabody/Tilfen in respect of the Thamesmead Golf Course. Whilst progress has not been made as had been expected, negotiation continues in a positive manner and the Applicant re-emphasises that it remains committed to working with Peabody Trust to seek to secure delivery of the Proposed Scheme's BNG and compensation for OMH impacts, at Thamesmead Golf Course. Alongside these negotiations, the Applicant has continued to explore alternative options for the delivery of the Off-Site Ecological Requirements, including greater provision within the Order limits.
- 1.1.7. This report therefore discusses the delivery options, alternative to the Former Thamesmead Golf Course, that the Applicant has been considering and demonstrates that there are a number of opportunities that could be explored and that ultimately, the Off-Site Ecological Requirements are deliverable.
- 1.1.8. In considering alternatives to the Thamesmead Golf Course, the Applicant has considered locations in London Borough of Bexley so as to apply a preference for delivering the Off-Site Ecological Requirements within the Proposed Scheme's host borough. As is explained later in this report, this has not been possible to date, however this remains the Applicant's preference where practicable.
- 1.1.9. This report does not discuss matters in relation to the securing of the delivery of the Off-Site Ecological Requirements – this is discussed further in the main response to the Secretary of State's first Request for Information.

## **1.2. NOTE ON BIODIVERSITY UNIT REQUIREMENTS**

- 1.2.1. To achieve a net gain for biodiversity, habitat creation or enhancement must improve upon the value of existing habitats (the 'baseline' value). Values quoted above in 1.1.3 represent the number of BU required to achieve a 10% net gain generally and regardless of existing off-site baseline value of a habitat. In some cases these differ from the BNG Report where habitat creation/enhancement BU requirements relate to the baseline value of habitats at Thamesmead Golf Course specifically. Differences in BU are therefore not miscalculations and have been proven by use of the Statutory Metric.

## 2. OFF-SITE ECOLOGICAL REQUIREMENTS DELIVERY OPTIONS

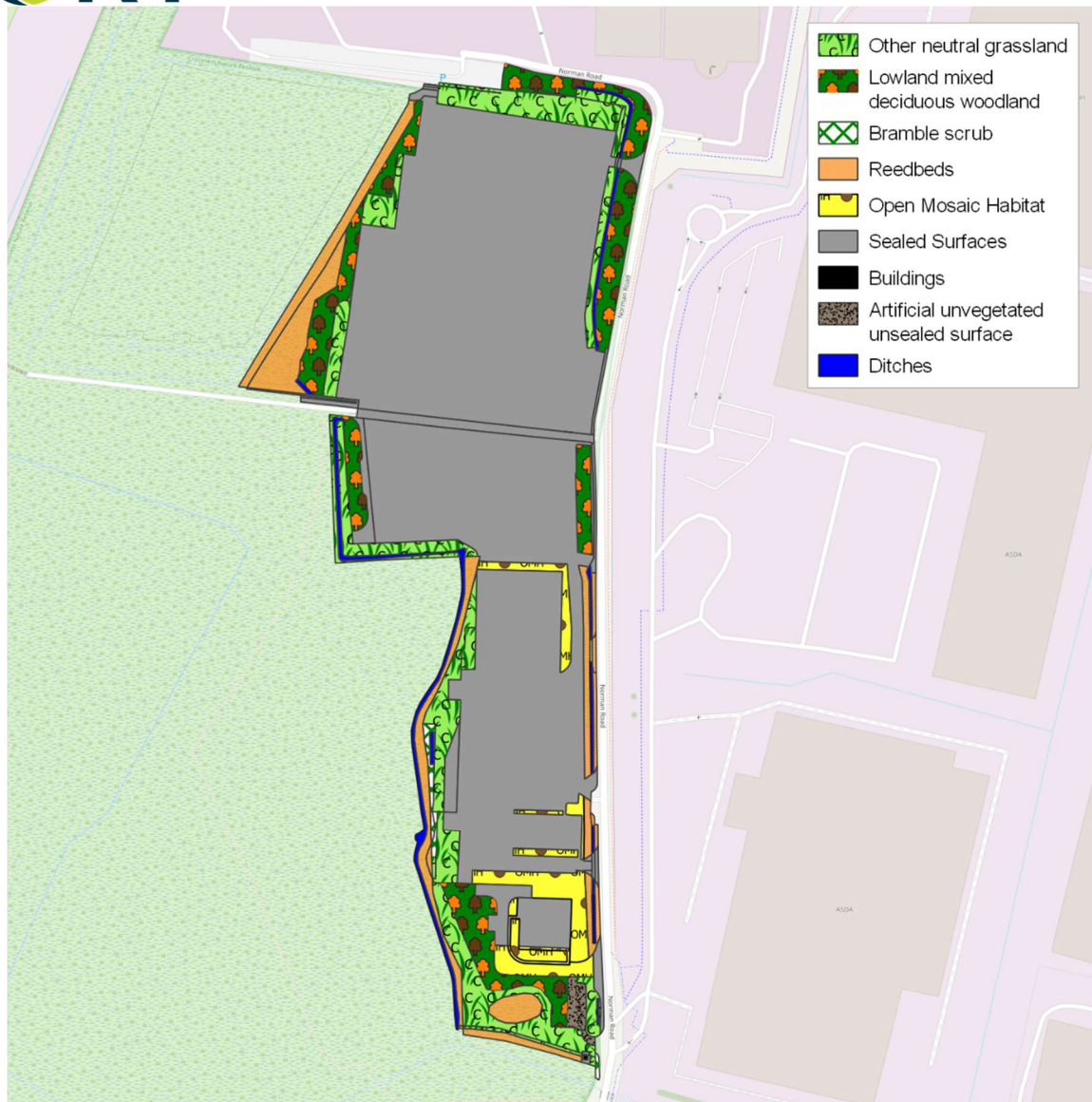
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### 2.1. INTRODUCTION

- 2.1.1. Following the close of Examination, the Applicant has considered both on-site and off-site options for the delivery of the various ecological aspects which make up the Off-Site Ecological Requirements. This section of this report considers both options.

### 2.2. ON-SITE DELIVERY

- 2.2.1. As set out in the **Outline LaBARDS** updated alongside this report, through early progression of some landscape design elements, the Applicant considers that greater provision of both OMH and Reedbed habitats would be able to be made on-site.
- 2.2.2. Whilst the Applicant has not updated the **BNG Report** to account for a worst case scenario where this is not delivered, it is now considered that the Applicant will be able to deliver all of its OMH (both in respect of achieving compensation and in achieving BNG) and reedbed requirements within the Order limits. This is shown at Figure 19 of the updated **Outline LaBARDS** and reproduced below.



**Reproduction of Outline LaBARDS Figure 19 – Indicative configuration of habitats within the CCF, incorporating required Open Mosaic Habitat and reedbed**

## 2.3. OFF-SITE DELIVERY

### OMH

- 2.3.1. As discussed above, the Applicant considers that it is likely that all of the OMH (6.48 Biodiversity Units required for BNG and compensation purposes) requirements can be replaced within the Order limits. The Applicant is also continuing negotiations to enable provision within the Former Thamesmead Golf Course.
- 2.3.2. However, to retain flexibility throughout detailed design and to give the Secretary of State the continued assurance that these habitats can be provided were that detailed design to mean that this could not be achieved, alternative, off-site opportunities have also been explored. These have focussed on undeveloped land parcels within Dartford



and Thurrock, comprising previously developed and now derelict areas of hardstanding and bare ground. No such opportunities have been found in Bexley to date, but may be available should the need arise in the future. The options as currently understood are set out in Table 1 and Figure 1, both over the page.

## **REEDBED AND OTHER NEUTRAL GRASSLAND**

- 2.3.3. The position on ONG remains as per the BNG Report. It is considered that there are no further opportunities to deliver the required 22.08 Biodiversity Units on site to enable 10% BNG to be delivered. As such, delivery of these units will be pursued off-site.
- 2.3.4. The BNG process requires that off-site habitat creation to offset losses from development occurs as close to the development causing the loss as possible. Compensation inside the same Local Planning Authority (LPA) or National Character Area (NCA) is required unless delivery inside these zones is not feasible, and looking further afield for an offset site must be justified in terms of the exhaustion of suitable local options. The Statutory Metric penalises the use of distant off-site delivery locations through the spatial risk multiplier.
- 2.3.5. The Former Thamesmead Golf Course remains the Applicant's preferred location for these habitats, and for the purposes of giving the Secretary of State the continued assurance that these habitats can be provided, options elsewhere have been explored.
- 2.3.6. The Applicant's analysis has identified that as an urban location within Greater London, there are no available sites within both the same LPA (London Borough of Bexley) and NCA (Greater Thames Estuary). However, options do exist within the Greater Thames Estuary NCA, as well as adjacent NCA.
- 2.3.7. For Reedbed, whilst as noted above it is considered that the required units would be able to be delivered on-site, for off-site the same considerations apply in terms of available opportunities as for ONG. Table 2 therefore identifies the opportunity locations which could also deliver on the required reedbed units (1.51 BU).
- 2.3.8. Table 2 (followed by Figure 2) sets out the identified off-site options for reedbed and ONG, and whether a spatial risk multiplier within the Statutory Metric would need to be applied when calculating the area of habitat delivered to offset losses due to the Proposed Development (the exact extent of this area being dependent on existing baseline conditions of land forming each proposed off-site location). In each case, discussions with the relevant landowners/agents have confirmed that there is more than the sufficient volume of the habitat units available for utilisation by the Proposed Scheme, including accounting for the spatial risk multiplier and so their site will be able to be used for the Proposed Scheme's requirements.
- 2.3.9. Whilst the price for these biodiversity units is not confirmed at this point (as agreement has not been reached) discussions to date identify that they would be no more than the statutory credit estimate. Such costs can be met from Cory's reserves if required.

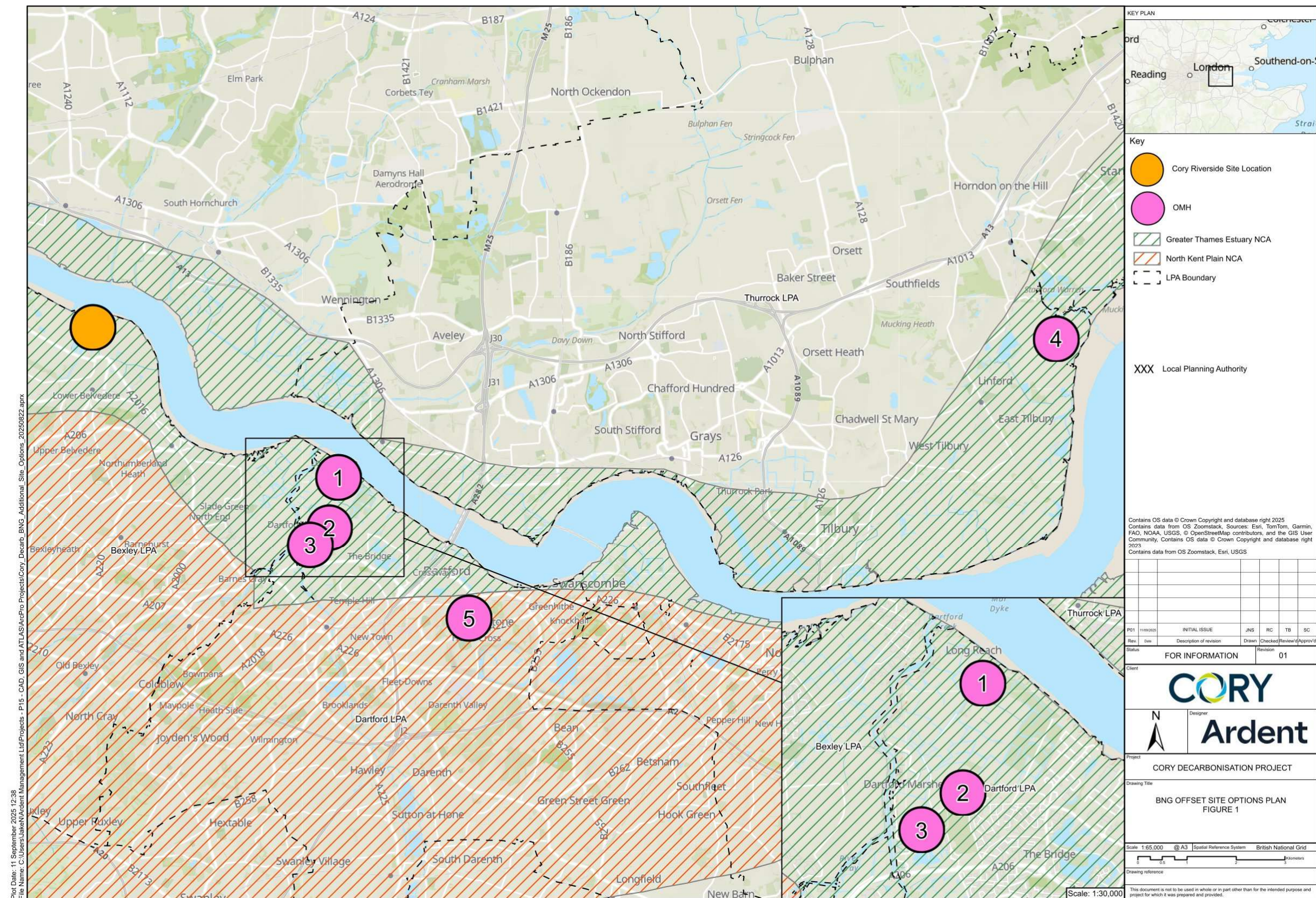
2.3.10. The delivery options presented in Table 1 are shown on Figure 1.

**TABLE 1 OPEN MOSAIC HABITAT OFF-SITE DELIVERY OPTIONS**

| Location |  | Description  | National Character Area | Local Planning Authority | Contact with Landowner/Agent  |
|----------|--|--|-------------------------|--------------------------|---|
| 1        | Land at Dartford Marshes, Joyce Green Lane Kent            | A combination of grass land and rough surfaces. Land is currently used for construction laydown and storage.<br>Metropolitan Green Belt  | Greater Thames Estuary  | Dartford Borough Council | Contractor for the Applicant is currently in possession of a leasehold over part of the site meaning that there is already a pre-existing relationship with the landowner that could look to be extended. |
| 2        | Land on the east side of Joyce Green Lane Kent             | A combination of grass land and rough surfaces. Former structures on site (from 1940s) in disrepair.<br>OMH already present on site, leading to opportunity for extension.<br>Metropolitan Green Belt  | Greater Thames Estuary  | Dartford Borough Council | The Applicant's land agent has an existing relationship with the landowner which will be able to be utilised to enable discussions with the Applicant.  |
| 3        | Land and buildings on the east side of Dartford Creek Kent | A combination of quarrying with grass land and rough surfaces.<br>OMH already present on site, leading to opportunity for extension.<br>Metropolitan Green Belt  | Greater Thames Estuary  | Dartford Borough Council | The Applicant's land agent has an existing relationship with the landowner which will be able to be utilised to enable discussions with the Applicant.  |
| 4        | Essex Wildlife Trust, Thameside Nature Discovery Park      | Existing nature reserve.<br>OMH already present on site, leading to opportunity for extension.<br>Metropolitan Green Belt  | Greater Thames Estuary  | Thurrock Borough Council | No contact to date.   |
| 5        | Land south of Cotton Lane Kent                             | Former landfill site that is now a combination of grass land and rough surfaces.<br>Planning permission granted for commercial/leisure uses with an open space strategy.<br>OMH already present on site, leading to opportunity for extension. | North Kent Plain        | Dartford Borough Council | No contact to date.   |



FIGURE 1 OPEN MOSAIC HABITAT OFF-SITE DELIVERY OPTIONS





2.3.11. The delivery options presented in Table 2 are shown on Figure 2.

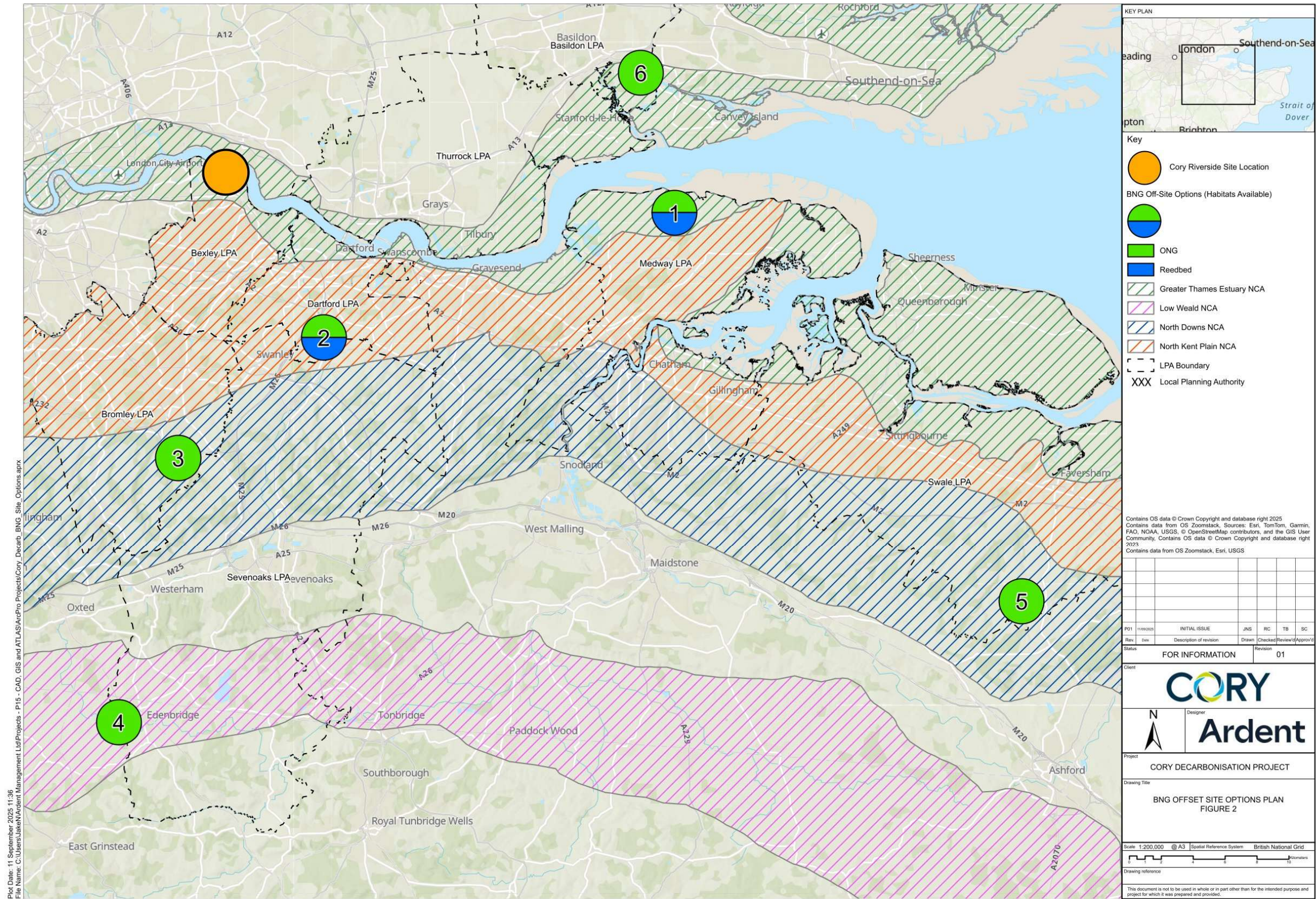
**TABLE 2 REEDBED AND OTHER NEUTRAL GRASSLAND OFF-SITE BNG DELIVERY OPTIONS**

| Habitat Bank |  | Description  | Other Neutral Grassland | Reedbed | National Character Area                                 | Local Planning Authority  | Contact with Landowner/Agent   |
|--------------|--|--|-------------------------|---------|---|---------------------------|--|
| 1            | Decoy Farm, Rochester Kent                       | <p>A fruit farm situated between wetlands hosting wildfowl and nationally important woodland. The majority of the site currently consists of temporary grass and clover ley, intensive orchards and horticulture, with areas of modified grassland. To expand and buffer the connecting marshlands habitats, the north and west parts of the site will become coastal floodplain grazing marsh with a network of new ditches and ponds.</p> <p>The south of the site will establish a new broadleaved woodland, helping to expand the adjacent ancient woodland. A scrubby border at the woodland edge will provide nesting and feeding habitat for a wide range of birds that use dense scrub for shelter while feeding in the adjacent fields of open grassland. The rest of the site will be turned to other neutral grassland.</p> | Yes                     | Yes     | Greater Thames Estuary                                  | Medway Council            | <p>Initial discussions direct with landowner and agent (Adonis Blue), sharing biodiversity metric. Next step would be to discuss pricing for delivery of the required BU for ONG and reedbed.</p> <p>Agreement in principle subject to contract.</p> |
| 2            | Darent Valley Landscape Recovery Project Kent    | One of the Government's pilot Landscape Recovery Projects intended to create and restore a mosaic of connected habitats along the River Darent, a chalk stream running between Westerham and the Thames (Dartford).  | Yes                     | Yes     | North Kent Plain stretching into Greater Thames Estuary | Dartford Borough Council  | <p>Initial discussions direct with landowner and agent (Adonis Blue), sharing biodiversity metric. Next step would be to discuss pricing for delivery of the required BU for ONG and reedbed.</p> <p>Agreement in principle subject to contract.</p> |
| 3            | Charmwood Habitat Bank, Orpington Greater London | A 200ha arable and grass farm, located on the North Downs, of which 32ha will initially be available. Habitats to be enhanced and created include: species rich chalk grassland; other neutral grassland; broadleaved woodland; mixed scrub; and species rich hedgerows with trees.  | Yes                     | No      | North Downs   | London Borough of Bromley | <p>Discussions with agent (Complete Land Management). Suitable for ONG delivery.</p> <p>Agreement in principle subject to contract.</p>  |

| Habitat Bank |   | Description  | Other Neutral Grassland | Reedbed | National Character Area      | Local Planning Authority   | Contact with Landowner/Agent   |
|--------------|---|--|-------------------------|---------|------------------------------|----------------------------|--|
| 4            | Devil's Den Habitat Bank, Edenbridge Kent | A 70ha farm of which 21ha will initially be available. Habitats to be provided include: other neutral grassland; broadleaved woodland; species rich native hedgerow; and individual trees.   | Yes                     | No      | Low Weald                    | Sevenoaks District Council | Discussions with agent (Complete Land Management). Suitable for ONG delivery.<br>Agreement in principle subject to contract. |
| 5            | Throwley BNG Site, Faversham Kent         | An arable farm, with grassland and woodland habitats and native hedgerows.<br>The project intends to enhance other neutral grassland, improve the condition of modified grassland and lowland woodland through management, and to join up smaller woodland areas to create a large broadleaved woodland. | Yes                     | No      | North Kent Plain/North Downs | Swale Borough Council      | Information from brokerage website. Indications are this site is suitable for ONG delivery.                                  |
| 6            | Bowers Marsh, Basildon Essex              | RSPB Bowers Marsh is a RSPB reserve situated between Pitsea Station and Benfleet Station in South Essex. Existing habitats include saline and freshwater lagoons plus a large area of restored grazing marsh. The RSPB are developing a BNG habitat bank at Bowers Marsh, including ONG.                 | Yes                     | No      | Greater Thames Estuary       | Basildon Council           | Initial discussions with RSPB. Suitable for both ONG and reedbed delivery.<br>Agreement in principle subject to contract.    |



FIGURE 2 REEDBED AND OTHER NEUTRAL GRASSLAND OFF-SITE BNG DELIVERY OPTIONS





## 2.4. FURTHER PROVIDERS AND STATUTORY CREDITS

- 2.4.1. In addition to the options identified above, with which Cory has had discussions, there are other providers of habitat provision that could be utilised for the Off-Site Ecological Requirements. Not least, there are new entrants to the market including:
- 2.4.2. Savills Earth (<https://www.savills.co.uk/sectors/energy-and-sustainability.aspx>);
- Legacy Habitat Banks (<https://legacyhb.co.uk/>); and
  - Green Earth Developments Group (<https://greenearthgroup.co.uk/>).
- 2.4.3. At the time of preparing this report Cory is not able to provide any further level of certainty in terms of the habitats that may be available from these providers. They are identified simply to demonstrate the rapid growth in this sector and range of options that are available.
- 2.4.4. As a last resort, and in a worst-case scenario where the Off-Site Ecological Requirements could neither be provided on site or at any off-site locations, the Applicant would pay for the statutory credits necessary to satisfy DCO Requirement 12.
- 2.4.5. In a situation where reedbed, OMH and ONG habitats were required to be offset through statutory credits, the total cost is estimated at £2,604,060<sup>2</sup>. This is based on provision of 47.19 Tier A1 units and 12.96 Tier A2 units, which includes the application of a spatial risk multiplier of 2 as statutory credits are likely to be used to deliver biodiversity enhancements at distance from the Site.
- 2.4.6. This is a cost that Cory would be able to cover from the company reserves, if required.

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<sup>2</sup> Using the online tool found at <https://manage-biodiversity-gains.defra.gov.uk/credits-estimation/credits-cost>



## 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)**