



Inception Meeting note

Project name	London Strategic Heat Main
Case reference	EN0710009
Status	Final
Author	The Planning Inspectorate
Date of meeting	26 March 2026
Meeting with	Meeting with Cory Environmental Holdings Limited
Venue	Microsoft Teams
Circulation	All attendees

Summary of key points discussed, and advice given

The Planning Inspectorate (the Inspectorate) advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008 (the Planning Act). Any advice given under section 51 would not constitute legal advice upon which applicants (or others) could rely.

The proposed development

On 27 August 2025, the Secretary of State for Energy Security and Net Zero made a Direction under section 35 of the Planning Act, establishing that the proposed development is a project in the field of energy wholly within England and is of national significance in accordance with section 35(2). A Development Consent Order (DCO) will be sought by Cory Environmental Holdings Limited (the applicant) accordingly for the construction, operation and maintenance of a heat transmission network named the 'London Strategic Heat Main' (the proposed development).

The proposed development will comprise of heat transmission pipelines and tunnels of approximately 30km to enable the transmission of hot water from a heat source at the applicant's existing facilities at Riverside Campus (known as Riverside 1 and 2 in Belvedere in the London Borough of Bexley), westward across London to heat distribution networks and other heat sources. The proposed development will require: a main underground transmission trunk and transmission branches; maintenance and access points (MAP) and associated construction laydown and temporary works (with associated movement of materials such as slurry); thermal storage areas (required to provide heat supply resilience); small substation 'kiosks' for MAP where pumping is proposed; ecological and landscape mitigation (where required); and other associated infrastructure including modifications at the Riverside facilities.

The proposed development is expected to cross the administrative boundaries of the London Borough of Bexley, Royal Borough of Greenwich, London Borough of Lewisham, London Borough of Southwark, London Borough of Lambeth, the City of London Corporation, City of Westminster, London Borough of Tower Hamlets, London Borough of Barking and Dagenham, and the Royal Borough of Kensington and Chelsea. The Greater London Authority (GLA) will also be a relevant consultee owing to its role as a strategic regional authority across Greater London.

Additionally, three separate pipeline branches are expected to cross beneath the River Thames (south to north), , for which the applicant will also need to consult the Marine Management Organisation (MMO) as the prescribed consultee for the tidal river about its proposals for construction, operation and maintenance and for disapplying any marine licence requirements therein, as well as engage with the Port of London Authority.

Riverside 1 is already built and operational and Riverside 2 will be operational shortly, with captured waste heat from Riverside 1 and 2 (and carbon capture facilities once constructed) expected to be transferred via an underground closed-loop water-based system. The pipelines are anticipated to be installed at depths of approximately 5-30

metres below ground level, with the construction route expected to follow beneath existing highways and alongside other below-ground utility pipelines where practicable, to mitigate effects on residential dwellings from construction and operation. These pipelines are expected to be installed using micro-tunnelling (two glass-reinforced plastic jacking pipelines, each approximately 1.5 metres in diameter, are proposed). The applicant clarified that this is deemed to be utility-scale infrastructure which would not require infrastructure of the size of the tunnel boring machines used for building the London Underground extensions, Silvertown Tunnel or Thames Tideway Tunnel.

In answer to a question from the Inspectorate as to whether pipe-jacking would require construction compounds similar to horizontal directional drilling (HDD), the applicant stated that MAP would be required at intervals along the route (at an approximate distance of every 200 metres subject to refinement of the proposed development), necessitating temporary construction laydown areas and compounds at these locations but these are expected to be comparatively smaller than those used for HDD. The applicant is seeking to achieve where practicable straight drives between MAP for launching or receiving the Strategic Heat Main pipeline. In so doing, the applicant aims to avoid where practicable building foundations by this construction method. The applicant will also seek to carry out construction to minimise large-scale disruption to London traffic, to be controlled through suitable traffic management and street works management measures for the in-highway MAP and compounds to be discussed and agreed with Transport for London and the Local Highway Authorities. Once constructed, permanent above-ground infrastructure should be limited to mainly the kiosks and MAP covers, with some limited above ground development (kiosk of design suitable to its surroundings).

The Inspectorate queried the nature of the proposed thermal storage areas. The applicant explained that these would typically comprise large, lined tanks or engineered excavations used to store hot water. These would help to manage peaks in heat demand and allow heat to be stored during periods when Riverside facilities are under maintenance, before being reintroduced into the system.

The applicant added that the proposed development has strong policy support from the Mayor of London as a “priority scheme” and that it considers that it also falls within the NPS definition of Critical National Priority (CNP) infrastructure (albeit accepting that this will likely be a point of discussion moving forward).. In answer to questions from the Inspectorate, the applicant stated that it considers that the proposed development falls to be determined under s104 of the Planning Act and in line with the relevant designated National Policy Statements for Energy, in its view of the wording provided in EN-1 that that policy statement applies to s35 energy schemes.

Consenting programme

The applicant has proposed the following programme for the pre-application stage (as outlined in the applicant’s initial Programme Document):

Stage	Activity	Anticipated Date
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Section 35 Direction	Section 35 request made	31 July 2025
	Section 35 direction made	27 August 2025
Pre-application launch	Planning Inspectorate Inception Meeting	26 March 2026
	Introductory meetings with host authorities and statutory bodies	April / May 2026
	Introductory engagement with political stakeholders	May / June 2026
Environmental Impact Assessment (EIA) Scoping	Submission of EIA Scoping report to Planning Inspectorate	July 2026
	EIA scoping opinion received	August/September 2026
Ongoing engagement	Continued engagement with host authorities and selected statutory bodies	April 2026 to October 2027
	Continued engagement with political stakeholders	
Consultation 1	Consultation stage for general public, land interests and other statutory / non statutory bodies	Late October to early December 2026
Consultation 2	Consultation stage for general public, land interests and other statutory / non statutory bodies	May to June 2027
Preparation of DCO application	Preparation of the Environmental Statement	July to October 2027
	Preparation of other supporting application documents and plans	
DCO application submission	Submission of the DCO application to the Planning Inspectorate	November 2027

Engagement with statutory bodies, local authorities, and other stakeholders

The applicant explained that it has been focused to date on undertaking detailed routing studies and site selection, identifying sensitive receptors through baseline data, and drafting its approach to construction management and engineering options. While some preliminary discussions have been held between the applicant and some relevant prescribed consultees, further engagement is planned (as set out above) to introduce the proposed development and begin talks on its design and placemaking, impact assessments, and possible mitigation measures. The applicant also plans to undertake an engagement programme in respect of how the DCO will interact with existing statutory regimes for managing street works and associated traffic management, as well as noise and dust matters, in London.

In addition to the authorities already cited, the applicant will also be engaging with the Port of London Authority, Network Rail, Historic England (and Greater London Archaeological Advisory Service), the Environment Agency, Natural England, the Health and Safety Executive, Emergency Service Group (London Ambulance Service, London Fire Brigade, and Metropolitan Police), amongst others to discuss issues such as heritage assets, environmental health, noise, vibrations, air quality, and traffic. The applicant will pursue agreeing appropriate Planning Performance Agreements (PPA) and discretionary service agreements with the relevant authorities, to enable engagement and informed feedback on technical proposals, which will inform the Potential Main Issues for Examination document.

The applicant explained its approach to consultation, which will include a series of introductory meetings with key technical and political stakeholders at Stage 1 (scoping), to early identify constraints and issues, build relationships and assisting with an understanding of the proposed development. Stage 2 (following scoping) will focus on public consultation about the routeing and MAP locations, through in-person events and online material / webinars, as well as technical workshops to focus on possible resolution to issues. Stage 3 (detailed public consultation) is expected to involve a site-by-site consultation of the MAP locations and preferred route, through the use of working groups, in-person meetings and public / virtual events. These activities, the applicant said, would also assist with its continued land refencing activities and further identifying any sensitive receptors and possible mitigation solutions as the scheme evolves.

The Inspectorate considered that the applicant's outlined approach to consultation and engagement was what it would expect to see from a nationally significant infrastructure project at pre-application, noting that there are forthcoming changes to consultation under the Planning and Infrastructure Act 2025. The publication of government guidance, expected in the summer of 2026, should clarify the principles for consultation following the removal of certain statutory requirements. The Inspectorate emphasised the importance of providing appropriate levels of information to consultees at each consultation stage, to enable informed and meaningful responses to be given, particularly owing to the sensitivities around traffic impacts, noise, and dust in such a dense urban environment.

Environmental constraints and issues

The proposed development is located within a dense urban area with limited space for construction compounds and infrastructure material. Traffic impacts are expected to be a main issue, with works likely to affect main access roads and highways throughout the south of London. Material delivery and disposal of off-site movements of excavated materials will be needed during construction, and several construction compounds at MAP locations will include material separation facilities. The applicant is proposing to include illustrative material handling arrangements within the Scoping Report to support an understanding of the proposed development. The applicant acknowledged that controlling noise, vibration, and dust during construction at MAP locations will be critical, especially near residents and community facilities. The temporary construction compounds at MAP locations may also result in localised visual impacts, the applicant added.

The applicant has identified the key sensitive receptors from the proposed development as the Greenwich World Heritage Site (WHS), Scheduled Monuments in Greenwich and Bermondsey and historic graveyards such as Crossbones Graveyard and Southwark.

There is also a high probability of unearthing below-ground archaeology including possible burial grounds. Appropriate surveys, assessment and proposed mitigation measures will be required accordingly. The proposed development will also interface with public open spaces and Special Category Land, requiring assessment and consideration of the relevant statutory tests. The applicant also noted opportunities where appropriate for betterment through high-quality reinstatement following construction.

The proposed development will also cross railways, underground lines, and Thames Tidal Defences for which the applicant will be required to enter into discussions with relevant statutory undertakers regarding the drafting and agreement of protective provisions. The Inspectorate advised the applicant to progress discussions and the sharing of drafted protective provisions (relying on standard provisions where possible) to avoid protracted negotiations at examination. The applicant has also identified interactions with committed developments, including on Old Kent Road and Thamesmead Waterfront, also noting future opportunities to connect these new developments to the heat network.

The Inspectorate asked if the applicant had identified any national security assets potentially affected by the proposed development, that would necessitate closed hearings and security clearance protocols. The applicant said it would undertake an assessment of any constraints and security measures (including considering the implications for hearing procedures for closed sessions at examination under the Planning Act and other protocols for safeguarding sensitive material). The Inspectorate added that, from past experience, such matters require extensive preparation and advanced notice to other organisations and asked the applicant to progress the early identification of security impacts to avoid problems arising at pre-application, acceptance and examination.

Environmental Impact Assessment (EIA) scoping

The applicant confirmed that its EIA scoping report is being prepared and will be submitted in July. It will focus on transport, cultural heritage, townscape and visual, air quality, ecology, noise and vibration, water and flood risk, waste and materials, socio-economics, health, climate, ground conditions, marine and the approach to cumulative effects within the study area. Relevant legislation, planning policy and guidance will be taken into consideration, while setting out the baseline conditions, assessment methodology, potential effects and possible mitigation measures.

The applicant stated that marine topics will be scoped out due to proposed depth and nature of the works under the River Thames though the applicant stated that this would be justified accordingly in the EIA scoping report.

In answer to questions from the Inspectorate, the applicant said that it had not at this stage scoped out major accidents and disasters but would set out its position in the scoping report. The applicant added that Habitats Regulations Assessment (HRA) screening is expected, with Stage 1 screening proposed. The Inspectorate stated that if the applicant submitted HRA information along with its EIA scoping report, it would not be commenting on it within its EIA scoping opinion.

Additionally, the Applicant stated that it proposed to provide the Water Framework Directive (WFD) screening and scoping assessment alongside the EIA scoping report. The Inspectorate stated that it would not be commenting on this within its EIA scoping

opinion. The environmental surveys are scheduled to commence following scoping, the applicant said.

In answer to further questions from the Inspectorate, the applicant said that it would consider what (if any) possible upstream and downstream greenhouse gas effects from the proposed development would be in view of the UK Supreme Court's judgement in 'Finch' (2024), following scoping (but would acknowledge that this is required in its Scoping Report), and how these might be predicted and measured within the environmental assessment and addressed in the Environmental Statement.

The applicant was advised to identify the maximum extent of the scoping boundary (e.g. the applicant showed areas of buildings hatched potentially to be excluded from the scoping boundary), especially where flexibility is needed for scoping, to ensure that the GIS Shapefile suitably captures all relevant prescribed consultees. The applicant said it was considering this issue and would ensure that the GIS Shapefile is submitted at least 10 working days prior to submitting the scoping report.

The draft Development Consent Order

The applicant explained that given the extensive nature of the street works for this proposed development and the cross-boundary implications, novel drafting in the DCO provisions is likely (as the standard street works articles will be insufficient) as well as addressing the interaction with the London Permit Scheme, Transport for London permits, and local authority highways requirements. The DCO will seek to modify or disapply existing regimes to create specific provisions to achieve a consistent approach across the project. However, the applicant believed that standardised approaches to managing construction noise and associated nuisance can be achieved, while avoiding the need for multiple consents under section 60 / 61 of the Control of Pollution Act 1974, through a system to be engaged upon with local authorities.

Land and rights

The applicant is developing its land acquisition strategy at this stage, while undertaking initial land referencing in identifying the totality of land rights and owners / occupiers within the proposed Order Limits. Category 1, 2 and 3 affected persons are to be identified and the Applicant is seeking to dovetail this appropriately with its consultation activities, mindful of the forthcoming changes to statutory consultation requirements. The approach to Compensation for subsoil only plots, the type of land powers to be sought (including on relation to protection/exclusion zones and the need for Settlement Deeds (as with Silvertown Tunnel and Thames Tideway Tunnel) is being considered, as well as working through the tests for Special Category Land. The applicant considers that compulsory acquisition powers are likely to be required for MAP locations and subsoil rights, and that relying solely on voluntary agreements is unlikely.

In answer to a question from the Inspectorate, the applicant is still identifying where Crown Land / Crown Estate assets may be located, including sites beneath the River Thames.

Application submission date

The applicant intends to submit its DCO application to the Inspectorate in November 2027.

The pre-application service offer

Despite the novel aspects of the proposed development, the applicant justified its request for the 'basic' tier pre-application service under the Inspectorate's 2024 Pre-application Prospectus owing to the extensive knowledge and experience of the applicant's consultants and legal advisers, who are said to have experience of managing large-scale infrastructure projects.

The Inspectorate expressed some reservation given the complexity and location of the proposed development, and the likely extent of impacts and the level of assessment and mitigation required, noting that the draft DCO may benefit from a draft document review by the Inspectorate prior to submission and with the possibility of chairing multi-party meetings between the applicant and stakeholders if discussions become complex. Despite this, the Inspectorate indicated that it would confirm the basic service tier shortly following the meeting, based on the experience of the applicant and the discussion points at the meeting, but advised the applicant to keep the matter under review during pre-application should a change in tier be necessary. The applicant would need to give three-months' notice if requesting a change in tier.

Feedback on the applicant's initial Programme Document (post meeting note)

The applicant supplied the Inspectorate with its initial Programme Document before the Inception Meeting in line with the 2024 Pre-application Prospectus.

Having reviewed the document, the Inspectorate considers that it mostly covers the expected content as set out in the government's pre-application guidance at paragraph 10. In particular, the Programme Document provides a comprehensive summary of the proposed development (including a useful location map showing the indicative route of the proposed development), policy context, a clear pre-application timetable of activities, and the applicant's approach to early engagement with statutory consultees and other parties.

However, the applicant has only provided a list of topics in its main issues section. The applicant should set out a broad summary of its view of the main issues at the outset and the activities needed to resolve them. The applicant may wish to review the Programme Documents produced by the applicants for 'Kingfisher Solar' and 'One Earth Solar' respectively as good examples of the level of useful information provided in these, which helps the Inspectorate and other parties understand the general context of the site and the main environmental and built heritage assets that may require specific assessment and mitigation.