Cory Environmental Holdings Limited

Heat Main 1
Qualifying Request for a Direction under Section 35 and Section 35ZA Planning Act 2008

1. Introduction

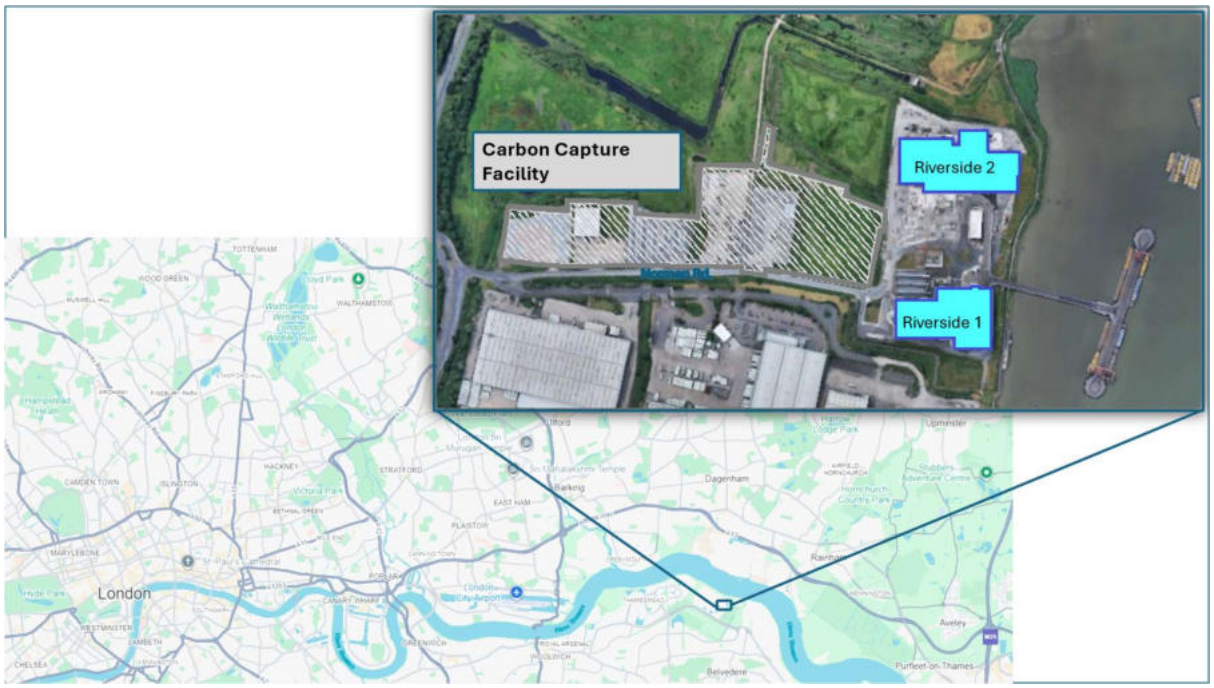
The Project and Promoter

1.1 This report constitutes a qualifying Request by Cory Environmental Holdings Limited ('**Cory**') under section 35ZA(1) of the Planning Act 2008 (the '**Act**') for a direction by the Secretary of State under section 35(1) of the Act that parts of the Heat Main 1 project (the '**Project**') be treated as development for which development consent is required.

1.2. The Project comprises twin heat transmission pipelines, tunnels and associated ancillary infrastructure, to enable the strategic transmission of waste heat from an anchor heat source at Cory's existing and proposed facilities at the Riverside Campus, in London Borough of Bexley ('**LBB**'), to central London. There is substantial waste heat available from the Riverside Campus to make a material impact on delivering net zero policy priorities, enabling energy security and addressing energy poverty.

1.3. Figure 1 presents the Riverside Campus, i.e. the current and potential heat sources.

Figure 1 Riverside Campus, Norman Road, Belvedere (London Borough of Bexley)



1.4. Cory is part of the Cory Group, a leading recycling, waste, energy and infrastructure business, with an extensive marine logistics in London, and a long history and connection to the city stretching back to the late 1700s. Today it is a major operator in the Port of London and plays a vital role in sustaining lighterage skills on the River Thames.

1.5. Cory Group has invested heavily in London's recycling, energy generation and river logistics infrastructure. In addition to its commercial customers, Cory Group is a trusted partner for several local authorities in London (serving a combined population of c.3 million people) operating essential infrastructure that London relies heavily upon on a day-to-day basis.

1.6. As a core part of its current activities, Cory Group has, since 2011, operated the 80.5MW electrical capacity[1] energy from waste ('**EfW**') facility known as Riverside 1 (previously known as Riverside Resource Recovery Facility) at the Riverside Campus, a site adjacent to the River Thames at Belvedere in the London Borough of Bexley ('**LBB**'). Riverside 1 currently diverts c.22% of London's waste from landfill or overseas export, saving 450kg of carbon dioxide ('**CO_2**') per tonne of waste.

1.7. In April 2020, the Secretary of State granted consent to Cory for a Development Consent Order ('**DCO**') in respect of the Riverside Energy Park, the key element of which is Riverside 2, a c.75MW electrical EfW facility[2] located adjacent to Riverside 1. The construction of Riverside 2 commenced in January 2023 and the facility is due to be operational in early 2026.

1.8. Together, Riverside 1 and Riverside 2 will provide some 50% of London's residual waste treatment capacity and the ability to save around half a million tonnes CO_2 emissions.

1.9. In April 2024, the Secretary of State confirmed that Cory's application for a DCO for the Cory Decarbonisation Project had been accepted for examination. That examination closed on 5 May 2025, with a decision due in November 2025. The main components of the Cory Decarbonisation Project comprise: a Carbon Capture Facility, designed to capture some 1.5 million tonnes of CO_2 emitted from the operation of Riverside 1 and 2; a new Jetty extending into the River Thames to facilitate the onward transport of the captured CO_2; the Mitigation and Enhancement Area, designed both to enhance biodiversity and to improve public access to outdoor space; construction compounds, connections to utilities and provision of site access works.

1.10. Both Riverside 1 and Riverside 2 play an important and strategic role in treating residual waste generated within London and the South East. The Cory Decarbonisation Project would enable those facilities to be decarbonised, delivering up to 1.49 million tonnes of CO_2 emissions savings per annum. Due to the residual waste comprising over 50% biogenic content, the deployment of the Carbon Capture Facility has the potential to deliver carbon net negative emissions.

1.11. However, it is relevant to note that the Project is not dependent on the decision on the Cory Decarbonisation Project due in November 2025. The Project is separate and would remain

[1] Pursuant to a section 36 Variation issued by the Secretary of State on 17 December 2021, which also limited annual throughput to 850,000 tonnes residual waste.
[2] At Schedule 1, the REP DCO (S.I.2020/419) consents an energy generating station with an output of up to 96MW and limits annual throughput to 805,920 tonnes residual waste.

viable and be able to be taken forward if consent for the Cory Decarbonisation Project was declined.

1.12. Waste heat can be supplied as either high or low grade, with high grade preferred in district heat networks. The waste heat from the Riverside EfW facilities is both, as would be the waste heat from the Carbon Capture Facility:

1.12.1. Riverside 1 ~220MW

1.12.2. Riverside 2 ~170MW; and

1.12.3. Carbon Capture Facility ~100MW to 300MW

1.13. Riverside 1 and Riverside 2 alone have the capacity to supply around 390MW. The Carbon Capture Facility heat cannot be simply added on, as it will use some of that heat and reduce it by about one third. Overall, the Riverside Campus, including the Carbon Capture Facility should it be consented, would be able to provide some 360MW to 560MW.

1.14. Cory is working on three complementary schemes to deploy the waste heat available at Riverside Campus for social benefit. These comprise:

1.14.1. a local heat distribution network (the '**Riverside Heat Network**');

1.14.2. moving waste heat by barge, utilising Cory Group's marine infrastructure and expertise ('**Mobile Heat**'); and

1.14.3. the Project.

1.15. The Riverside Heat Network is being progressed through a partnership with Vattenfall, which aims to deliver up to 58MW of heat for up to 21,000 homes in LBB and Royal Borough of Greenwich. In April 2021, the Riverside Heat Network was awarded funding from the Government's Heat Networks Investment Project and is currently being progressed.

1.16. In the context of the Project, the Riverside Heat Network could constitute the first 'heat distribution network' that would connect to the 'transmission route' created by the Project. Context on the relationship between transmission and distribution is set out further in section 2; however, it is important to note that heat distribution networks do not form part of the Project, nor the subject of this Request.

1.17. Mobile Heat enables the direct delivery of waste heat from Riverside Campus to heat networks along the River Thames, by moving barges filled with heated water to discharge locations, each holding 120MWh of thermal energy.

1.18. An initial reference design for Mobile Heat was supported via funding from the Heat Network Development Unit in the Department for Energy Security and Net Zero, with reference to the Pimlico District Heating Undertaking, working with Westminster City Council. Supply by Mobile Heat to a number of heat networks under development in central London is now being progressed with several heat network developers and local authorities. For instance, it is incorporated in the Advanced Zoning Pilot scheme design procured by the Department for Energy Security and Net Zero for the City of London.

National and Regional Policy

1.19. The Climate Change Act 2008 committed the UK to reducing its greenhouse gas emissions by 80 per cent by 2050, compared to 1990 levels. It represented the first global legally binding climate change mitigation target set by a country.

1.20. The Climate Change Act 2008 sought to manage these reductions through a system of five-year carbon budgets, to be monitored and reviewed by the Committee on Climate Change ('**CCC**'). The CCC is an independent body established under the Climate Change Act 2008 to provide evidence based advice to the UK Government and Parliament on the mandatory carbon budgets.

1.21. The CCC has reported that the first and second carbon budgets were met, and the UK is on track to meet the third (2018–22). These early successes have been made primarily through substantial changes to electricity generation. However, delay in delivering real change in other sectors, principally transport means that the UK is not on track to meet the fourth (2023–27) or fifth (2028–32) budgets.

1.22. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 made targets more ambitious, making the UK the first major economy to commit to a 'net zero' target. The new target requires the UK to bring all greenhouse gas emissions to net zero by 2050.

1.23. In April 2021, the government legislated for the sixth carbon budget ('**CB6**'), which requires the UK to reduce GHG emissions by 78 per cent by 2035 compared to 1990 levels.

1.24. In May 2024, using its powers under the Energy Act 2013 for the first time, Government published 'Strategy and Policy Statement for Energy Policy in Great Britain' ('**Energy Policy 2024**') demonstrated its intent to deliver strategic policies for energy supply.

1.25. At paragraph 7, Energy Policy 2024 makes clear that '*Government expects private sector investment of around £100 billion in the energy sector in the period to 2030, with the expectation that this will support up to 480,000 jobs in 2034. Through the effective pursuit of their statutory objectives, undertaken with reference to this SPS, Ofgem and NESO will help grow the economy, facilitate the net zero transition, and keep bills down for energy consumers, while maintaining a secure supply of energy.*'

1.26. This includes through the development of heat networks that, with heat pumps, are recognised as '*established technologies that will be the primary means for decarbonising heating over the next decade and play a key role in all 2050 scenarios.*' (paragraph 66)

1.27. Paragraph 67 of Energy Policy 2024, confirms '*heat networks are a crucial aspect of the path towards decarbonising heat and reaching net zero by 2050. In the right circumstances, they can reduce bills, support local regeneration and be a cost-effective way of reducing carbon emissions from heating.*'

1.28. Within London, there is huge demand for heat. As described in more detail at section 6, the Mayor has taken substantial steps to deliver this crucial infrastructure, not least identifying the EfW facilities at the Riverside Campus as a strategic heat source.

Conclusion

1.29. The infrastructure projects progressed by Cory Group demonstrate it is a market leader in developing policy driven decarbonisation infrastructure and providing sustainable solutions.

1.30. Low carbon heating is both a national and local priority to meet climate change commitments and address energy security and poverty, in a timely manner, with the Riverside Campus an identified strategic source point for that heat.

1.31. To realise the full potential of heat supply from the Riverside Campus will require development of national significance to enable provision of heat transmission from these facilities to Central London - the Project.

2. Heat Main 1

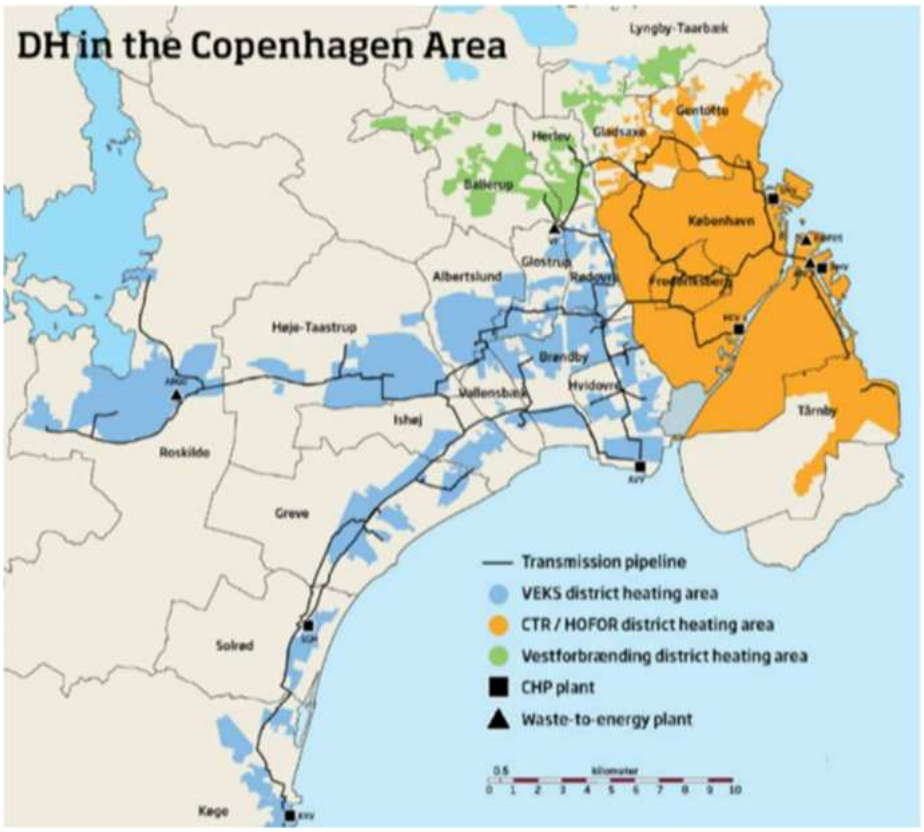
Overview

2.1. The Project involves the construction of twin tunnels to accommodate heat transmission pipework to transport heat (in the form of hot water pumped under pressure) from the Riverside Campus (in Belvedere, LBB) to central London.

2.2. It also requires associated infrastructure such as intermediate pumping stations and power supply to these (which may be provided by a third, likely smaller tunnel, carrying private wire electricity generated from the Riverside Campus), access/maintenance/ thermal storage shafts; and a large number of small construction/laydown facilities.

2.3. Heat transmission infrastructure on this scale has been operational since the 1980s in Scandinavia and northern Europe. In those developed heat markets, as with electricity and gas in the UK, "transmission" is a different and distinct asset class from "distribution". For instance, in Copenhagen, there is a c.54km heat transmission main, which supplies 26 district heat distribution networks (see Figure 2). The Project would constitute by far the largest heat transmission project in the UK, and is arguably the first UK asset in that class by continental European standards.

Figure 2 Transmission Mains in Copenhagen



2.4. Consequently, the purpose of the Project is to provide a strategic heat main to allow heat distribution networks (that form neither part of the Project nor this Request) to connect and onward supply heat to end consumers. It is anticipated that these heat networks would be developed in alignment with the Government's regulatory proposals in relation to local heat network zones, and the Project is being factored into planning for a number of existing and planned heat networks in London. Examples of these are demonstrated through the positive discussions held with LBB and letters of support for this Request and the Project (see Annex One) from:

2.4.1. Greater London Authority ('**GLA**') and London boroughs;

2.4.2. Bring Energy in respect of the Battersea network;

2.4.3. E.ON in respect of the CitiGen network in the City of London;

2.4.4. Hemiko and Vital Energi as developers of the South Westminster Area Network (SWAN) – the first heat network to be brought forward under the zoning framework and directly procured by the Department for Energy Security and Net Zero;

2.4.5. 1Energy in respect of a planned heat network in London Bridge; and

2.4.6. SSE in respect of a planned heat network in Chelsea;

2.5. An indicative route for the Project is shown in the plan at Annex Two accompanying this Request. This indicative route covers a distance of some 30km and runs through seven London boroughs that would readily be served by the Project: Bexley, Greenwich, Lambeth, Lewisham, Southwark, City of Westminster and City of London (the '**LAs**').

2.6. The indicative route presents Heat Main 1 as both a trunk (the green line) and branches (blue arrows) that could serve district heat networks and/or other offtakers. It is noted that this plan does not constitute a red line boundary for the Project at this stage, and the Request for the Direction is not sought for a Project for a specific route.

Key Elements of the Project

2.7. The key elements of the Project are as follows:

Tunnels and Pipelines

2.8. The Project will involve the construction of twin tunnels with likely outer diameter of 1.4m (the '**Tunnels**') constructed generally at depths ranging from c.5m to 40m using microtunnel boring machines ('**MTBM**').

2.9. Within each of these tunnels will be placed a heat transmission pipeline running the length of the Tunnels (the '**Heat Transmission Pipelines**').

Shafts

2.10. Along the Tunnels there will also be located intermediate shafts (located every c.350 – 500m and likely to reach around 80 in number) (the '**Shafts**'). These will extend below ground and would be used to construct the Tunnels and to access them for maintenance. The Tunnels would likely be vertically stacked to minimise the Shaft's diameter. At the shallowest the Shafts will be c.10m deep: the crown of the upper tunnel in the pipe would be c.5m below the

surface, with a gap roughly equal to the Tunnels diameter between the upper and lower Tunnels. In central London, passing under the Thames and needing to take account of the infrastructure such as the London Underground will require the Shafts and Tunnels to be significantly deeper.

2.11. The Shafts will launch and receive the MTBM to create the tunnels. The launch shafts will have an internal diameter of c.6m and the reception shafts c.4m. Figure 3 presents an image of a reception shaft at roughly this scale.

Figure 3 Representative 4m reception shaft being entered by an MTBM

2.12. The Shafts would also include within them:

2.12.1. bridging pipes so that the heat can flow through the shafts from the pipes exiting on either side of the shaft ('**Bridging Pipework'**);

2.12.2. in some cases, sufficient space to allow the shafts to be used for thermal storage;

2.12.3. in appropriate locations based on the engineering design, intermediate pumping stations; and

2.12.4. electrical connections (for instance to support operations of the pumping stations) and other utility connections (communications etc).

2.13. Within the Shafts, provision would also be made for a small pipe coming off the Bridging Pipework with a valve, enabling connection for heat distribution networks. This apparatus would be hydraulically separated from the Project's heat transmission pipeline, with heat transfer via a plate heat exchanger at each connection point. For the purposes of this Request this equipment is termed the '**Distribution Connecting Apparatus**' and forms part of the Project.

2.14. As noted in the Overview section above, any heat distribution network infrastructure that is brought forward to connect to this Distribution Connecting Apparatus (including any

tunnelling associated with that heat distribution network infrastructure), does not form part of the Project and does not form part of this Request.

Electricity Supply

2.15. The electricity supply for the operation of the Project would come either from the Riverside Campus or connection to the electricity grid. If this supply comes from the Riverside Campus, then alongside other utility requirements it will either be provided within the Tunnels, or a separate third tunnel would be built in the vicinity of the Tunnels ('**Utility Tunnel**').

2.16. Alternatively, the network supply could come from third party providers through separate infrastructure.

Construction

2.17. The Heat Transmission Pipelines are likely to be installed through being hydraulically pushed through the ground from a launch shaft to the reception shaft, and in so doing, creating the Tunnels. The distance of drives via this technique are likely to range from c.350m to c.500m.

2.18. In some special case areas, a different construction technique such as open cut or horizontal directional drilling might be used.

2.19. It is understood at this stage that the construction process will involve the creation of slurry that will need to be treated and separated onsite, before being transported away.

2.20. Alongside the need for spoil storage, craneage, temporary staff welfare and parking facilities, slurry processing will mean that construction compounds will be required at each Shaft location, of varying sizes depending on the function of the Shaft in question.

Riverside Campus Works

2.21. To the extent that heat recovery or transfer infrastructure to supply and transfer the heat to the Heat Transmission Pipelines is not able to be constructed pursuant to existing consents (including any DCO made for the Cory Decarbonisation Project), the DCO for the Project would seek to authorise that infrastructure ('**Riverside Campus Infrastructure**').

Mitigation and Enhancement Works

2.22. Cory also recognises that the development of the Project may necessitate the provision of environmental mitigation measures and will require the achievement of statutory BNG. These would seek to be authorised in any DCO for the Project.

3. Reasons for submitting the Request for the Direction

3.1. Cory is of the view that the Project as described in this Request should be considered nationally significant, for the reasons set out in section 6 of this Request. However, it is the case that notwithstanding that national significance, the Project is unable to automatically participate in the process under the Act, and all the benefits that being able to do brings, as explained below.

NSIP Criteria Position

3.2. Section 14 of the Act sets out what projects should be considered to be Nationally Significant Infrastructure Projects ('**NSIP**') and includes at section 14(g): "the construction of a pipe-line other than by a gas transporter". It is noted that the Project involves the installation of pipework, and Cory is not a gas transporter.

3.3. Section 21 of the Act then goes to explain that the construction of a pipe-line only falls within section 14(g) where it meets a number of different criteria, the most relevant of which for the purposes of the Project is 'a cross-country pipeline'. Section 235 of the Act states that the definition of cross-country pipeline has the same meaning as in the Pipe-lines Act 1962 (the '**1962 Act**').

3.4. Section 66 of the 1962 Act indicates that a cross country pipe-line is a 'pipe-line' whose length exceeds, or is expected to exceed, 16.093 kilometres. The Project is c. 30km and thus above that threshold.

3.5. Consideration therefore needs to be given as to whether or not the pipework proposed by the Project meets the definition of 'pipe-line' in the 1962 Act found in section 65 of that act, the most relevant part being paragraph (1)(b) of that section. The consideration therefore turns on the meaning of the following:

"pipe-line" (except where the context otherwise requires) means a pipe (together with any apparatus and works associated therewith), or system of pipes (together with any apparatus and works associated therewith), for the conveyance of any thing other than air, water, water vapour or steam, not being…. a pipe or system of pipes constituting or comprised in apparatus for heating or cooling or for domestic purposes

3.6. As the Project both involves the conveyance of water, and is a pipe for heating purposes, it is considered that the Project does not automatically quality as a NSIP.

3.7. However, it is considered that to enable the nationally significant benefits of the Project to be realised in a certain and timely fashion to help meet the UK's legally binding net zero commitment, it needs to be brought forward as a Development Consent Order ('DCO'), for the reasons set out below.

Consenting Complexity of Constructing the Tunnels, Heat Transmission Pipelines Shafts, Bridging Pipework, Distribution Connecting Apparatus and the Utility Tunnel (together the 'Underground Infrastructure')

3.8. It is intended that the Underground Infrastructure will be, where reasonably possible and practicable, constructed predominantly within the highway boundary across multiple highways authorities in London. In the absence of the DCO, the ability to do this is highly complex:

3.9. Firstly, in respect of the planning position:

3.9.1. the development of heat infrastructure of this type (nor indeed any heat infrastructure provider) does not benefit from the permitted development powers set out in the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (the 'GPDO'); and

3.9.2. the Tunnels and Heat Transmission Pipelines do not fall under the exceptions to of the definition of 'development' for which planning permission is required under section 55(2) of the Town and Country Planning Act 1990, as it involves the laying of new apparatus, rather than inspecting or maintaining existing apparatus. As such, even if Cory were a statutory undertaker for these purposes, the works would not involve 'development'.

3.10. As such, based on the law as it currently stands, the Underground Infrastructure would require planning permission across its full length, from the multiple LAs.

3.11. Secondly, where the works for the Underground Infrastructure take place in the street, this would constitute street works for the purposes of the New Roads and Street Works Act 1991 ('**NRSWA**'). The consenting position in respect of such works is also complex in the context of the Project:

3.11.1. under section 51 of NRSWA, it is an offence to place apparatus in a street unless a street works licence is obtained or in pursuant to a statutory right;

3.11.2. currently Cory and other heat infrastructure providers do not have a statutory right to do so. As such, as a starting position, Cory would need to obtain street works licences under section 51 of NRSWA from every relevant LA, and from the TfL in respect of the TfL Road Network, acting as street authority; and

3.11.3. even in the case where entities who do have a statutory right, the operation of the NRSWA regime is not applied across the LAs in any event, as they have put in place the London Permit Scheme pursuant to the Traffic Management Act 2004. It is also the case that GLA/TfL are the permitting authority under that Scheme on TfL Network roads which would be utilised by the Project. Such permits would therefore likely be required (noting also that it is not entirely clear if the carrying out of the construction of all aspects of the Underground Infrastructure would constitute 'registerable activities' under the London Permit Scheme, which adds a further lack of clarity) from each relevant LA and TfL even if Cory was given a statutory right to place apparatus in streets.

3.12. The benefit of a DCO, as a statutory instrument, is that it would be able to create one Project-specific regime to deal with all of the street works required for the Project, across the whole length of the Project. In the absence of this, the Project would need to obtain multiple licences/permits across an extended area for what is the core of the Project, i.e. the construction of the Underground Infrastructure under streets.

3.13. On these matters, Cory recognises that the Government intends in time to bring forward regulatory change to enable licensed heat networks providers to enjoy the benefits of a statutory undertaker by having a statutory right to install apparatus in streets and have permitted development powers.

3.14. However, Cory considers that these prospective powers would not remedy the complexities set out above as:

3.14.1. whilst Cory welcomes this, it is bringing this Request forward now to meet the urgent need for low carbon heat that cannot wait for the regulatory regime to catch up;

3.14.2. it is not clear if the proposed rights and powers would apply to a strategic transmission project such as this, given the definitions of relevant heat transmission systems within the Energy Act 2023;

3.14.3. a statutory right to install apparatus in streets does not solve the issue of the need for multiple permits as set out above; and

3.14.4. whilst permitted development powers could be granted, article 3 of the GPDO is clear that permitted development powers are not available for development which cannot be screened out from being EIA development. Under Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, 'industrial installations for carrying gas, steam and hot water' of over 1 hectare would constitute EIA development if likely significant effects were screened in. Given the length of the Project, and the amount of receptors it would pass (by way of just one example, the sensitive heritage receptors within the centre of Greenwich), Cory considers it is possible that the Underground Infrastructure would be considered EIA development, meaning permitted development powers would not be able to be utilised and planning permission would be required.

<u>Construction Compounds</u>

3.15. Cory's concerns in respect of permitted development powers are also relevant when considering the ability to consent the c.80 construction compounds that will be necessary for the Project.

3.16. Whilst it is recognised that Part 4 of Schedule 2 to the GPDO provides permitted development powers for construction activities associated with operations being carried out in, under, over, or adjoining the land in which a compound is proposed, it is considered that given the compounds would be associated with the wider Project, and the Courts specifically caution against projects being 'salami sliced' to avoid EIA assessment, that such compounds would be considered to form part of the wider EIA development that is the Project.

3.17. As such, each Compound would require planning permission. Whether that was sought separately or as part of planning permission for the Underground Infrastructure within each LA, this would add further complexity to the planning permission (and lead, for example, to the potential for different construction hours being accepted in different locations), rather than one approach being agreed for the Project as a whole via DCO Requirement.

Riverside Campus Infrastructure and Environmental Mitigation and Enhancement Works

3.18. In respect of the Riverside Campus Infrastructure, Cory is concerned that to the extent that any new consent is required above and beyond its existing consents (Riverside 1 and Riverside 2) and hoped for consent (the Carbon Capture Facility) for the Riverside Campus Infrastructure, it would want to ensure that it was not putting those consents at risk (and, importantly, cause confusion for LBB and third parties as to what the planning position is at the Riverside Campus) following the recent Supreme Court judgment in *Hillside.*

3.19. This is the case as the red line boundary of any new consent would likely overlap with that of the existing consents and hoped for Cory Decarbonisation Project DCO (given there is already overlap between the red line boundaries for Riverside 1, Riverside 2 and the Cory Decarbonisation Project).

3.20. The ability to use the DCO to put in place the statutory provisions to ensure that this does not occur (as seen for example, in the recent DCO for the Lower Thames Crossing project) is therefore an important benefit of being able to use the Act regime.

3.21. Separately, Cory notes that if environmental mitigation and enhancement works are required, then these will also require planning permission, adding further complexity to the planning position.

Other Consents and Approvals

3.22. Part of the Project will likely involve crossing the River Thames. Absent a DCO, this may require:

3.22.1. a flood risk activity permit under the Environmental Permitting (England and Wales) Regulations 2016 from the Environment Agency. This is something often disapplied through DCO, with such controls replaced with the text of Protective Provisions for the Environment Agency;

3.22.2. a river works licence from the Port of London Authority under section 66 of the Port of London Authority Act 1968. As seen in DCOs such as the Silvertown Tunnel Order 2018 and the Port of Tilbury (Expansion) Order 2019, it is possible for DCOs to deal with the regulatory and consenting requirements of the Port of London Authority within a DCO, negating the need for separate River Works Licences; and

3.22.3. a marine licence from the Marine Management Organisation, something that could otherwise be captured within a DCO as a 'Deemed' Marine Licence. Whilst Cory is aware of the 'bored tunnel' exemption under regulation 35 of the Marine Licensing (Exemption) Regulations 2011, it is not clear at this stage whether the Tunnels would be of a sufficient depth, or that works would not be required below Mean High Water Springs that would not significantly adversely affect any part of the

environment of the UK marine area or the living resources that it supports, such that the Project could be exempted from the need for a marine licence.

3.23. Additional to this, the Project would likely necessitate the interaction with the assets of a large number of statutory undertakers and telecoms companies (noting that there are often numerous apparatus within any one street), including the crossing of TfL and Network Rail structures.

3.24. Absent a DCO the timely progress of the Project would be entirely dependent on the willingness of these various asset owners to engage and reach agreement with Cory in respect of asset protection. Using the process in the Act would have the benefit of bringing all of these parties to one table through the Examination process and using one place (the DCO) to set out a Project-specific regime for how those asset interactions are dealt with.

3.25. It is also noted that the construction of the Underground Infrastructure and access to Construction Compounds may necessitate alterations to the layout of streets and/or the diversion/temporary closure of public rights of way. Absent a DCO, approval for these matters would be required separately under the Highways Act 1980 or Town and Country Planning Act 1990, as appropriate.

Land

3.26. Finally, it is noted that the Project will require a large amount of land. These land requirements would likely vary from temporary requirements for the construction compounds, potential permanent requirements for environmental mitigation and enhancement and the Shafts; and, potentially, a large amount of permanent acquisition of rights and restrictive covenants in respect of the other aspects of the Underground Infrastructure, particularly where streets are unregistered and the 'ad medium filum' rule would apply – i.e. the land that is considered to be under the highway through which the Tunnels would pass would be private property belonging to the landowners on either side of the highway.

3.27. It is therefore considered extremely likely that compulsory acquisition powers would be needed in order for the Project to be able to be delivered, given the length of the Project, and the complexity of property holdings in London meaning a large amount of land interests are likely to be potentially affected, with voluntary agreements unlikely to be reached with that volume in a timely manner to enable delivery.

3.28. The DCO process is beneficial in this regard as:

3.28.1. it would roll up 'land powers' with the planning, streets and other consents required for the Project, rather than a separate Order being required (even if Cory were able to obtain one);

3.28.2. it would enable Cory to have those land powers, as absent regulatory reform, it would otherwise require each and every LA to pursue its own Compulsory Purchase Order in support of the Project which may not be possible or would be yet another complexity to the overall consenting process;

3.28.3. it is understood that Government does not intend to include CPO powers for heat network developers in forthcoming rights and powers regulation under the Energy

Act 2023, and as noted above under "Consenting Complexity", it is possible that such powers in any event would not apply to the Project either because of the way the definitions are framed within the legislation such that it's not clear transmission projects would be in the scope of any powers concerned. Furthermore, even if they were able to be brought forward pursuant to a separate CPO, it is not clear if they would be as wide-ranging as is allowed for in DCO including, for example, temporary possession powers. Although Cory notes the proposals in the Planning and Infrastructure Bill in respect of this (i.e. that the Neighbourhood Planning Act 2017 would potentially apply to allow temporary possession powers to be included), it would be concerned that enabling all parties who could be affected by a scheme of this length and complexity to serve a counter-notice requiring compulsory acquisition or limit the period of temporary possession could make the Project undeliverable; and

3.28.4. enables all parties affected one place in which to lodge their objections to all aspects of the Project through the Examination process.

Conclusion

3.29. This section 3 has demonstrated that the Project would necessitate a large number of consents across a number of different regimes and different authorities, and that whilst Cory considers that at this stage it cannot wait for the Government's regulatory reforms, even if did wait, the proposed reforms would not fix this requirement or the complexities involved in obtaining them.

3.30. Absent a DCO, the nationally significant benefits of the Project are highly likely to be delayed or made unable to be delivered, as each regulatory authority (including any CPO inspector) would be required to consider the merits of the relevant consents and approval afresh and in a range of different statutory and non-statutory timescales.

3.31. Furthermore, there is a high risk of an inconsistent approach being taken in terms of the conditions of such consents and approvals across numerous LAs and other consenting bodies, adding complexity and delay to the Project.

3.32. The DCO would enable nearly all consents for the Project to be rolled up into once consent and one process, providing certainty and reducing complexity in Project timescales, delivery and cost. A Direction is therefore requested to enable this to happen.

4. Development for which Development Consent is Required

4.1. In light of the consenting complexities set out in section 3, Cory is requesting a Direction that the following aspects of the Project described in section 3 should be directed to be development for which development consent is required under the Planning Act 2008, but only where the purpose of the development relates to the transfer of heat derived from the Riverside Campus:

4.1.1. the Tunnels;

4.1.2. the Heat Transmission Pipelines;

4.1.3. the Shafts;

4.1.4. the Bridging Pipework;

4.1.5. the Distribution Connecting Infrastructure; and

4.1.6. the Utility Tunnel.

together, the '**PNS Development**'.

4.2. It is important to ensure that the Direction relates only to development that is associated with heat derived from the Riverside Campus to:

4.2.1. ensure that other transmission heat networks are able to be brought forward as separate consents; and

4.2.2. ensure that if further transmission extensions or interconnectors are brought forward to connect to Heat Main 1 to utilise the heat supplied from Riverside Campus, the same benefits of the DCO regime described in section 3 are able to be applied to all parts of the extended network.

4.3. This is reflected in the draft Direction submitted at Annex Three to this Request.

4.4. It is proposed that all other aspects of the Project described in section 2 would be brought forward as associated development.

5. Qualifying Criteria

5.1. Further to all of the above, and in respect of the principles set out in sections 35 and 35ZA of the Act concerning a qualifying request and a direction, Cory confirms that:

5.1.1. all elements of the Project for which a direction is sought should be considered as 'development for which development consent is required' are in the field of energy (s.35(2)(a)(i)) as they will facilitate the transport of heat emitted as a direct consequence of the energy generated by Riverside 1, Riverside 2 and the Carbon Capture Facility if it is consented;

5.1.2. the Project will be wholly within England (s.35(2)(b) and s.35(3)(a));

5.1.3. the Project is a project of national significance (s.32(c)) for the reasons set out in section 6 below;

5.1.4. no application for a consent or authorisation mentioned in s.33(1) or (2) of the Act has been made in respect of the works which make up the Project (in the context of s.35ZA(8) and (9)); and

5.1.5. the development to which the request relates is specified in section 2 and 4 and Annex Two of this document (s.35ZA(11)).

5.2. In preparing this qualifying request, Cory has taken guidance from directions previously made by Secretary of States in all fields. Cory has also had regard to the policy statement issued by the Department of Communities and Local Government (as was) in relation to the extension of the Planning Act 2008 regime to business and commercial projects for an indication of the types of matters that can be considered as supporting criteria for assessing national significance in the context of the Act.

To assist the Secretary of State and provide clarity on what Cory is requesting, a draft section 35 direction has been included at Annex 1 of this Request.

6. National Significance of the Project

Achievement of net zero

6.1. The delivery of net zero is of national and international significance and indeed is of fundamental importance to the future of the UK economy and human survival, as recognised by the Paris Agreement, COP26 and the passing into law of the net zero target.

6.2. As the recent International Panel for Climate Change ('**IPCC**') report indicates, accelerated action is required to adapt to climate change, at the same time as making rapid, deep cuts in greenhouse gas emissions. This is particularly the case in the context that a 'temporary overshoot' of the previous 1.5ºC 'target' for avoiding large scale climate change impacts is likely to occur sometime between 2030 and 2052.[3]

6.3. The 6CB published by the CCC in December 2020 makes clear that the actions required to meet the budget and the UK's Nationally Determined Contribution.

6.4. At page 115, 6CB advises that the '*Balanced Net Zero Pathway implies that by 2030, low-carbon heat installations in homes could represent up to around 80% of sales. Of these low-carbon installations … 19% are low-carbon heat networks… .'* Further, 6CB expects low-carbon heat networks to be built imminently, '*through 2020-2050, with scaling up through to 2028, from which point around 0.5% of total heating demand is converted per year. By 2050, around a fifth of heating is distributed through heat networks*.'

6.5. The Seventh Carbon Budget ('**7CB**'), published in February 2025 and due to be set by Government in 2026, continues to see a key role for low-carbon heat networks within the Balanced Pathway:

6.5.1. delivering *'22% of heat demand in non-residential buildings by 2040 in the Balanced Pathway'* (page 254); and

6.5.2. that '*after 2035 no new fossil fuel heating systems are installed and all homes have a low-carbon heating system fitted by 2050'.* (page 299)

6.6. In October 2023, the government clarified that heat pumps and heat networks will be the primary low-carbon technology for decarbonising home heating over the next decade and will play a key role in all pathways to 2050.

6.7. In March 2024, the National Audit Office reported[4] that

'*Heating the UK's 28 million homes accounted for 18% of all UK greenhouse gas emissions in 2021, the most recent year for which data are available. The main source of these emissions is from burning natural gas to heat homes. Reducing emissions from heating homes is therefore a key component of the government's overall target to achieve net zero greenhouse gas emissions by 2050.'*

[3] https://www.carbonbrief.org/analysis-what-the-new-ipcc-report-says-about-when-world-may-pass-1-5c-and-2c/

[4] https://www.nao.org.uk/reports/decarbonising-home-heating/#background-to-the-report

6.8. In June 2025, the National Infrastructure Strategy pledged to fund the Warm Homes Plan with a total of £13.2 billion over the Spending Review 2025 period, intended to be allocated across schemes that support low-carbon technologies, including heat networks.

Heat – A national policy priority with first use case based on London demand

6.9. The importance of heat in delivering net zero priorities has been recognised by government since 2016[5] in stating its intention to works with industry and local authorities to deliver new heat networks and improve existing ones. '*Heat networks are also uniquely able to use local sources of low carbon heat which would otherwise go to waste.*'

6.10. The waste heat from the Riverside Campus is exactly this unique resource.

'Heat networks are vital to making net zero a reality in the UK. In high density urban areas, they are often the lowest cost, low carbon heating option. This is because they offer a communal solution that can provide heat to a range of homes and businesses by capturing or generating heat locally.

By driving forward new low carbon technologies like heat networks, we can cut the use of fossil fuels for heating our homes and shield households from oil and gas price rises that are being pushed up by pressures on global energy markets.'

6.11. Presentations from the GLA note that the national zoning model implies a particularly high concentration of heat networks in London, covering over 30% of heat demand. The overwhelming need for heat to supply heat networks is towards the centre of London, though there is scope to supply considerable heat along the entire transmission route to local urban centres and concentrated demand locations such as hospitals and universities, and new build developments where heat distribution network infrastructure can be efficiently integrated. For example, there is enough waste heat from Riverside 1 and Riverside 2 (c.3TWh per year) to meet the annual heat demand of both LBB and the City of London.

6.12. The London Environment Strategy (2018) ('**LES**') presents a policy framework for heat networks, identifying them as 'an effective and low carbon means of supplying heat in London, and offer opportunities to transition to zero carbon heat sources faster than individual building approaches.' (page 256) Policy 6.2.1 of the LES is to deliver more decentralised energy to London, moving from the current position of meeting just 2% to 15% by 2030.

6.13. Policy of the London Plan requires major development (both residential and non-residential) to be net zero-carbon through implementing the energy hierarchy (policy SI 2) and to utilise a communal heating system where possible, particularly those using secondary heat sources (policy SI 3).

6.14. Paragraph 9.3.2 makes clear the challenge and preferred solution:

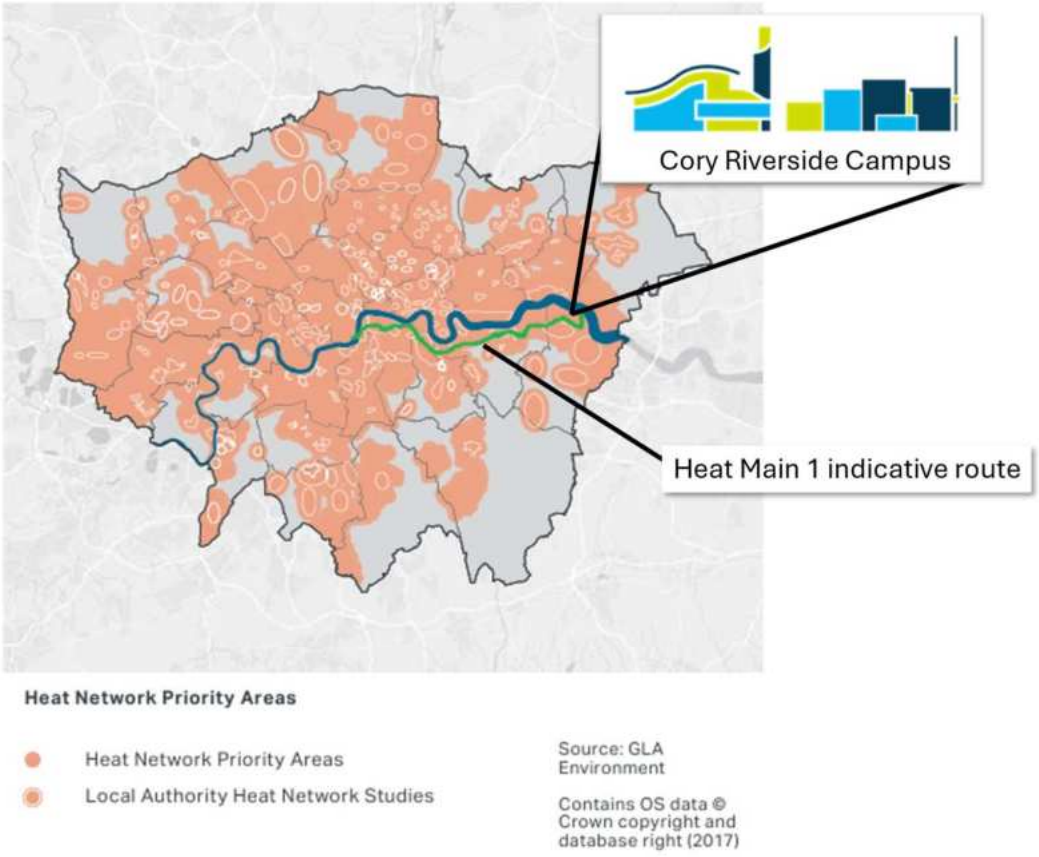
'London is part of a national energy system and currently sources approximately 95 per cent of its energy from outside the GLA boundary. Meeting the Mayor's zero-carbon target by 2050 requires changes to the way we use and supply energy so that power and heat for our

[5] https://www.gov.uk/government/collections/heat-networks

buildings and transport is generated from local clean, low-carbon and renewable sources. London will need to shift from its reliance on using natural gas as its main energy source to a more diverse range of low and zero-carbon sources, including renewable energy and secondary heat sources. Decentralised energy and local secondary heat sources will become an increasingly important element of London's energy supply and will help London become more self-sufficient and resilient in relation to its energy needs.'

6.15. The London Plan identifies Heat Network Priority Areas, within which the heat density is sufficient for heat networks to provide a competitive solution for supplying heat. The Riverside Campus and potential route of the Project aligns with these areas, as shown in Figure 4.

Figure 4 London Plan Figure 9.3 Heat Network Priority Areas with Heat Main 1 indicative route



6.16. More recently, the GLA has been funding Local Area Energy Plans ('**LAEP**') across London intended to identify the most effective route to decarbonise a local area's energy system. The LAEP is based on a data driven approach considering a range of technologies, including heat networks. Cory is engaging with administrations within London that are progressing their LAEP, and this has helped inform the route of the Project, heading west from the Riverside Campus into Central London.

6.17. Very recently (in December 2024) the GLA published its report 'London Energy Accelerator. Waste Heat Strategic Areas Summary' (the '**GLA Report**'). Chapter 12 of the study concludes

'*there is a significant quantity of waste heat available from a relatively few large waste heat sources across London and they provide a good opportunity to develop out a number of strategic multi-borough district heat networks.*' The GLA Report identifies Cory's EfW operations at Belvedere as one of those uncommon, strategic, heat sources.

6.18. Figure 12-1 of the GLA Report (reproduced below at Figure 5) shows the studied Strategic Area Networks and the strategic goal of capturing and distributing this heat with long range transmission mains, such as the Project.

Figure 5 GLA Report Figure 12-1 Map showing Strategic Area Networks

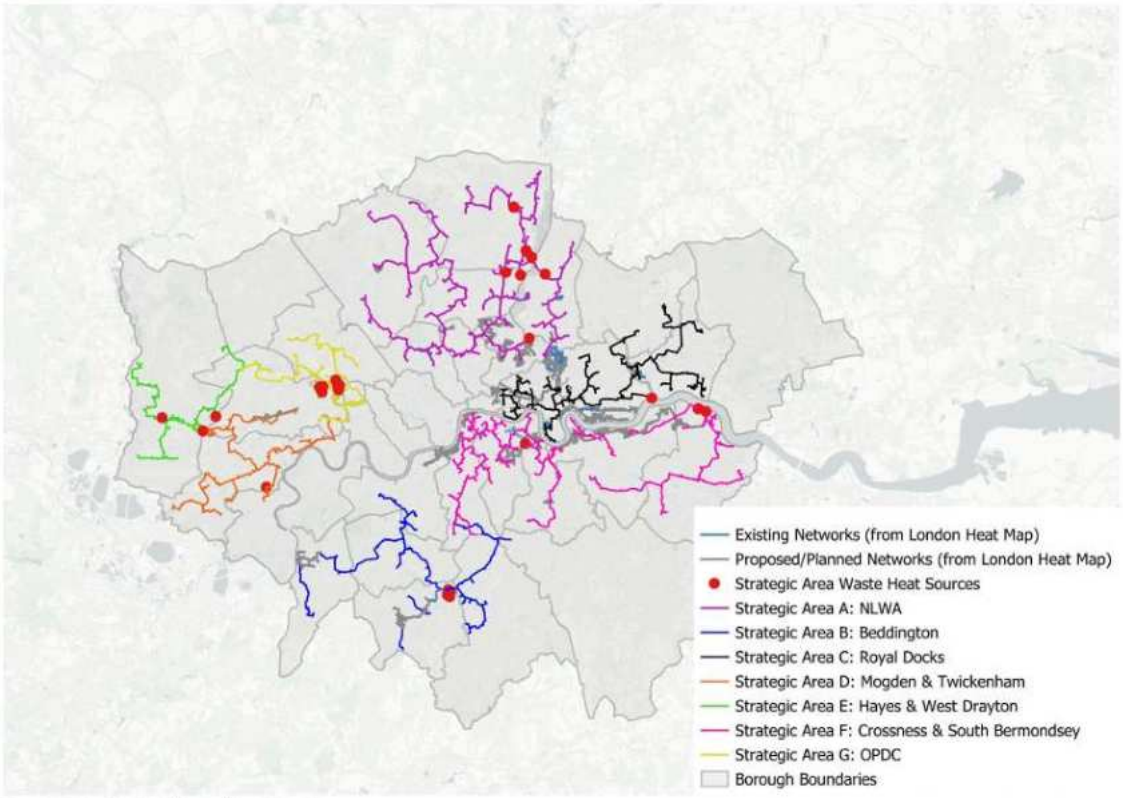


Figure 12-1 Map showing all Strategic Area Networks

6.19. To realise this opportunity requires a partnership approach and a '*departure from the current development model which is largely happening at an individual borough level and led, in most cases, by the relevant London Borough. This is often constraining the ambition and size of London's district heat networks and with the introduction of heat network zoning in 2025, there is real opportunity for London Government – the GLA, London Councils and London Boroughs - to coordinate and develop these strategic opportunities.*' (GLA Report, chapter 12)

6.20. The Project would be sized to enable heat from other sources being added in the future and serve a number of heat distribution networks along the route and those being brought forward under the heat network zoning programme, enabled by the Energy Act 2023 (such as

the South Westminster Area Network, the networks being planned in the City of London, or the potential heat zones in LB Southwark and LB Greenwich) .

6.21. The Project will make a material contribution to delivering national and regional policy priorities for low carbon heat, demonstrating that such infrastructure is deliverable by the private sector.

Input and Heat Source

6.22. The national significance of the volume of waste that will generate the waste heat that is to be provided through the Project should also be noted.

6.23. Riverside 1 currently receives residential waste from Western Riverside Waste Authority (comprising the London Boroughs of Hammersmith and Fulham, Kensington and Chelsea, Lambeth, and Wandsworth), Westminster, Tower Hamlets, Bexley, and the City of London and receives commercial waste from across London and the South East.

6.24. Once built, Riverside 2 also anticipates receiving waste from across London and the South East, further to the need identified in reports such as 'Residual Waste in London and the South East: Where is it going to go?' prepared annually by Tolvik Consulting, which identifies that there is a significant deficiency in London and the South East's waste management infrastructure. The Secretary of State, in making the DCO for Riverside 2, agreed that there is a need for infrastructure to fill that gap.

6.25. Collectively, Riverside 1 and Riverside 2 are anticipated to sustainably and hygienically process up to 1.65 million tonnes of residual waste per annum from London and the South East. By ensuring that the waste heat generated from the incineration of that waste is captured, and put to good use, the Project will help reduce the CO_2 emissions of the at least 3 million people producing that waste.

6.26. The waste heat available from Riverside 1 and Riverside 2 would be comparable to heating at least some 300,000 homes each year[6].

6.27. Delivering both heat and power from the Riverside EfW facilities means they are fully contributing to the circular economy of the Capital. The Project will therefore provide an important contribution to reducing the carbon emissions of the several million people Cory services in London and the South East.

6.28. Further, in the event that the Cory Decarbonisation Project DCO is granted; development of Carbon Capture Facility will mean that the waste heat available from the Riverside Campus will be increased in quantity and move from being low carbon to zero carbon.

Energy Security, Energy Poverty and Growth

6.29. District heat networks are also a vital part of ensuring UK energy security, positively addressing energy poverty and delivering growth. In June 2025, HM Treasury published 'UK Infrastructure: A 10 Year Strategy', paragraph 4.50 advises:

[6] Using the Ofgem average national domestic heat demand assumption. This is considered a conservative approach.

'*Heating buildings is a key contributor to UK emissions, accounting for approximately 22% of emissions in 2023, primarily driven by the use of natural gas to heat homes. The transition to low carbon heat – in tandem with energy efficiency and wider system changes – can also support reducing energy bills over time. Improving the energy efficiency of the building stock will also help lower system costs and help address fuel poverty.*'

6.30. The CCC's annual progress reports to Parliament, including that of June 2025, consistently recognise that emissions reductions are driven by the electricity supply and industry sectors. Over 80% of the required emissions savings up to 2030 need to come from other sectors, including the electrification of key technologies underpinned by the continued decarbonisation and expansion of the electricity system.

6.31. The Project is demonstration of decarbonisation beyond electricity supply; delivering the use of waste heat to displace continued reliance on fossil fuels. Further, it will reduce electricity demand for heating, enabling that resource instead to be utilised elsewhere to meet decarbonisation targets.

6.32. The waste heat from the Project would be notable in quantity but also in quality, considering the wider social context of the energy transition. The lowest cost, lowest carbon heat is the waste heat that already exists. Accessing it requires capital investment in developing and operating infrastructure, which drives growth and jobs. Via thermal storage, large scale heat transmission can also play a crucial low-cost, long-duration role in balancing the wider energy system, something that is now being done effectively in Denmark to support intermittent offshore wind.

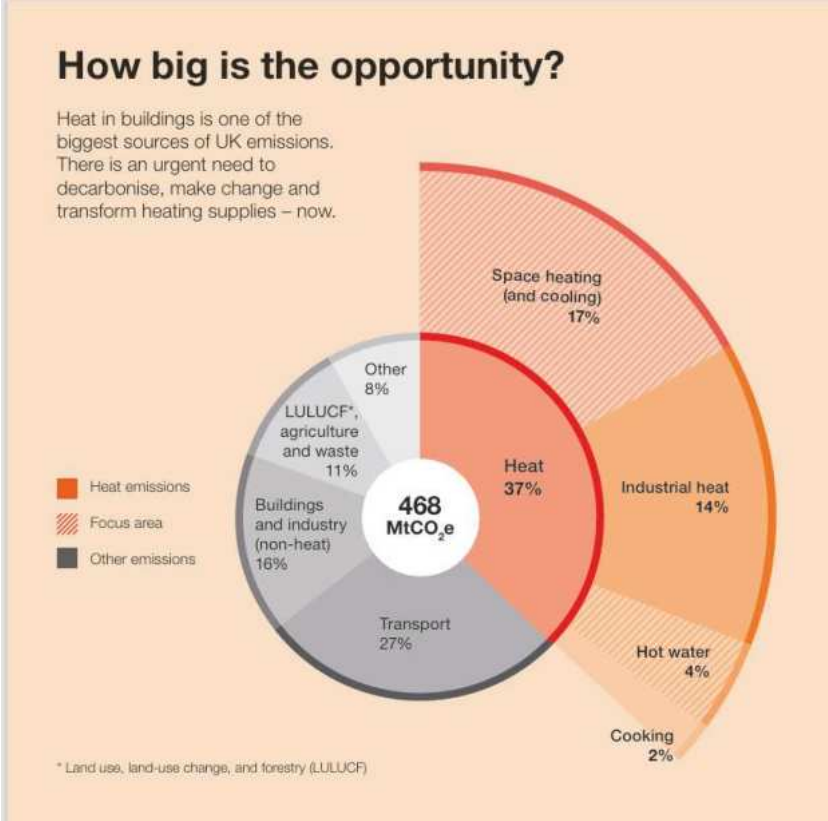
6.33. As a local supply solution it is also comparatively insulated from international price shocks. It can supply heat at a temperature which is immediately suitable for dense urban areas and historic plumbing and building fabric, typical of UK cities. As the climate warms, it can also support cooling networks via absorption cooling, using the same transmission infrastructure.

Figure 6 London's Heat Need v Heat Available via the Project

London's Heat Need	Riverside's Heat
Low-cost heat, protecting from fuel poverty	*Lower cost than gas*
High temperature heat, appropriate to old building fabric and heating systems	*Heat available at 90C, suitable for legacy heating systems*
Heat at scale, to match the very large load demand in central London	*Very significant heat available*
Low carbon heat – heat is nearly 50% of the carbon footprint in central London	*Heat available at 15g Co2e/kWh* – a c.94% reduction on natural gas, lower than heat pumps or H2*
A solution **deliverable in the near term**	*Heat deliverable in the early 2030s, with bridging solutions available*
Minimise strain on the electricity grid – this will already be constrained and needed for other decarbonisation / electrification initiatives	*No absorption of grid capacity in central London, avoiding costs / upgrades, and leaving capacity for other needs*
Locally sourced heat, protecting from international instability	*Heat produced from London's own waste*
A strategy that drives **investment and jobs**	*Recovering and using heat supports long term investment & jobs*
Ideally, a strategy that considers growing **cooling demand**	*Potential to supply cooling via absorption chillers*
	* *UK Treasury Greenbook 15 yr assessment*

6.34. The UK Heat Networks Market Overview (updated July 2024) recognises local heat networks as a vital part of the transition to net zero and a cost-effective way to reduce carbon emissions from heating and hot water. '*The UK consistently tops global rankings as the best place to invest and do business. Heat network investment potential is estimated to be £60 billion to £80 billion by 2050.*' (page 3) As demonstrated by the graphic presented on page 4 (reproduced at Figure 7), heat presents the single largest opportunity for tackling domestic emissions.

Figure 7 Graphic from UK Heat Networks Market Overview (page 4)



6.35. At paragraph 6.24, UK Infrastructure: A 10 Year Strategy stresses that *'Infrastructure design should be guided by a hierarchy. First, maintain and optimise existing assets.'* The Project, a private sector led scheme, does just that; it will optimise existing assets at the Riverside Campus to deliver national and regional benefit.

6.36. The Project, with a budget likely to be of many hundreds of millions of pounds, will achieve a high level of carbon emission savings and positively address energy security and poverty, all whilst continuing to deal with the waste needs of a multi-million sized population across London and the South East.

6.37. However, the scale of the Project means that (as set out in section 3), without determination under the Planning Act 2008, it would require separate planning consent from at least seven separate planning authorities along with a myriad of other consents and land powers. Delay or lack of delivery in any one of those permissions would pose a material risk to its achievement and the inability to realise the strategic impacts of national significance that can be delivered through the Project.

Conclusion on National Significance

6.38. The UK Government and international community have recognised the importance of achieving net zero and of positively addressing both energy security and energy poverty. A range of methods will need to be deployed to deliver these aims, with heat being a crucial part of achieving sustainable urban energy supply.

6.39. Decarbonising the UK's heating relies on heat networks in dense urban areas. Successful scaling of heat networks in turn relies on low-cost, low carbon sources of heat. Heat transmission mains from strategic heat sources, configured on the basis proposed for the Project, represent a proven and highly replicable pathway to providing this low carbon heat, while protecting consumers, ensuring energy security, and driving jobs and economic growth.

6.40. Consequently, the Project should be considered as nationally significant and thus able to benefit from the streamlined DCO regime that will enable it to be realised in a timely manner.

7. Conclusion

7.1. Cory seeks a Section 35 Direction to ensure there is certainty in the consenting process to bring this much needed Project forward.

7.2. This approach (and the Project itself) has the support a number of stakeholders, not least as seen in the letters of support enclosed with this application (at Annex One) including from the GLA and district heat network developers.

7.3. Obtaining such a Direction will ensure that:

7.3.1. there are no wasted costs in bring forward an application in an incorrect manner;

7.3.2. the wide array of consents that would be required for each part of the Project will be able to be addressed within one, consolidated, efficient and expeditious process; and

7.3.3. most importantly, a nationally significant project will be consented in the most appropriate fashion that reflects its status.

7.4. We trust therefore that all of the above provides sufficient information for the purpose of enabling the Secretary of State to decide:

7.4.1. whether to give the direction requested under section 35 of the Planning Act 2008; and

7.4.2. the terms in which it should be given.

7.5. Should the Secretary of State require further information, Cory will happily provide any additional detail that may be required.

Annex One: Letters of support

Letter of support have been provided from the following parties (in alphabetical order):

- 1Energy (London Bridge);
- Bring Energy (Battersea);
- City of London Corporation
- E.ON (CitiGen network in the City of London);
- Greater London Authority;
- London Borough of Lambeth;
- London Borough of Lewisham;
- London Borough Southwark;
- South Westminster Area Network (SWAN) Partnership;
- SSE (Chelsea); and
- Vattenfall Heat UK.

Letter of Support

To whom it may concern

Re: Letter of Support – Heat Main 1 – Cory Group

1Energy, one of the leading heat network developers in the UK, is developing a new heat network at London Bridge and are also part of a competitive process to decarbonise the St Thomas' Hospital estate.

A key constraint in developing and scaling heat networks in London is securing well priced, low carbon heat. On this respect, we have been in discussion with Cory about the potential to supply heat from Riverside EfW since 2024. This has included technoeconomic evaluation based on heat loads, supply arrangements and potential pricing for heat from a long-range heat transmission main. Heat supply on this basis from Riverside (the "Project") has the potential to provide the low-carbon, low-cost heat which our heat networks require.

We support the Project being designated a development for which development consent is required under the Planning Act 2008.

Yours sincerely

John Saunders
Strategic Development Director
1Energy Group

21 July 2025

Bring Energy

Growing Sustainable Networks

Thursday 24th July 2025

To whom it may concern

Re: Letter of Support – Heat Main 1 – Cory Group

Bring Energy are a leading developer of heat networks across the UK, with operations in central London at Battersea and the US Embassy.

A key constraint in scaling heat networks in London is securing well priced, low carbon heat. Since 2024 we have been having conversations with Cory regarding utilising the heat from their Riverside EfW facility. This has included technoeconomic evaluation based on heat loads, supply arrangements and potential pricing for heat from a long-range heat transmission main. Heat supply on this basis from Riverside (the "Project") has the potential to provide the low-carbon, low-cost heat which our heat networks require.

We support the Project being designated a development for which development consent is required under the Planning Act 2008.

Yours faithfully,

Mark Raymond

Concession Management Director

City Surveyor's Department
Paul G Wilkinson MSc, BSc, MRICS
The City Surveyor

TO WHOM IT MAY CONCERN

Telephone 020 7332 3358
Email
paul.wilkinson@cityoflondon.gov.uk

Date 21 July 2025

Re: Letter of Support – Heat Main 1 – Cory Group

I am writing to express support for Cory's proposed "Heat Main 1" project (the "Project") being designated a development for which development consent is required under the Planning Act 2008.

The City of London Corporation (CoL) is committed to achieving Net Zero in Scope 1 and 2 emissions by 2027 and Scope 3 by 2040; Building climate resilience and championing sustainable growth are also two of the pillars of the CoL's Climate Action Strategy. Being home of some of the most iconic buildings in the UK, decarbonising the heat used in the City of London is essential not only for achieving our decarbonisation targets but also as a statement of the wider UK's Net Zero carbon commitments.

The Project provides an opportunity to harness low-carbon, low-cost, waste heat from strategic sources such as Cory's energy from waste facilities at Belvedere, positively and appropriately supporting CoL's Climate Action Strategy.

Yours sincerely,

Paul Wilkinson
City Surveyor and Executive Director of Property

Citigen (London) Limited
47-53 Charterhouse Street
London
EC1M 6PB

antony.meanwell@eonenergy.com
07967 991155

Cory Riverside
Fifth Floor, 10 Dominion Street
London
EC2M 2EF

16 July 2025

To whom it may concern

Subject: Letter of Support – Heat Main 1 – Cory Group

E.On, a leading heat network developer, has been operating the Citigen heat network in the City of London for over 20 years. We are currently creating opportunities for investing in decarbonising and expanding the Citigen network and at the core of this work is finding reliable, low-cost and low-carbon heat sources.

Since 2024 we have been having conversations with Cory regarding utilising the heat from their Riverside EfW facility. This has included technoeconomic evaluation based on heat loads, supply arrangements and potential pricing for heat from a long-range heat transmission main. Heat supply on this basis from Riverside (the "Project") has the potential to provide some of the low-carbon, low-cost heat which Citigen requires.

We support the Project being designated a development for which development consent is required under the Planning Act 2008.

Yours faithfully,

A Meanwell

Antony Meanwell
Head of Heat Zone Development
E.ON UK

Date: 18th July 2025

To whom it may concern

RE: Letter of Support – Bringing Strategic Heat Transmission Mains under the Nationally Strategic Infrastructure Projects and Development Control Order Regime

I am writing to express the GLA's support for bringing Strategic Heat Transmission Mains under the Nationally Strategic Infrastructure Projects and Development Control Order Regime. This will provide a clear support mechanism, that is already enjoyed by other energy utilities, for enabling the delivery of strategic multi-borough heat network infrastructure. It would provide London, and other cities, with a clear mechanism to deliver sub-regional strategic heat infrastructure in pursuit of our climate and energy goals whilst also supporting the successful roll-out of the government's Heat Network Zoning legislation.

The GLA has a clear vision for heat networks to play an important part in supporting the development of a low carbon, flexible energy system that can support London to meet the Mayor's 2030 Net Zero target. Recovering waste heat and integrating it into heat networks is a fundamental part of that vision and is brought together in the London Waste Heat Study. It identifies London's largest strategic waste heat sources, including Cory's Riverside plant, and highlights the opportunity for developing low carbon district heat networks supplied by large strategic heat transmission mains spanning multiple London Boroughs.

To deliver heat transmission main projects of this scale would otherwise require planning consents from multiple London boroughs as well as complicated sub-soil land rights from numerous landowners. The traditional planning route is not suitable or appropriate for projects of this scale or magnitude, from a construction and impact perspective. That is why the GLA supports these types of projects being designated as suitable for determination under the Planning Act 2008.

This would allow for this mechanism to be considered and used, where appropriate, to develop heat transmission mains to distribute large volumes of heat from existing large waste heat sources in London to meet the considerable heat demand that we have in the capital. The heat main being proposed by Cory - Heat Main 1 (the "Project") - is a good example of the type of project that would then be able to apply for designation as a development for which a development consent order is required under the Planning Act 2008 for its delivery.

The GLA has been engaging with Cory over many years to support the recovery of waste heat from the Riverside Campus to supply heat networks in London. This has included discussions, since early 2024, around the opportunity for a large heat transmission main into central London. This is an exciting and pioneering project that shows how large volumes of low carbon heat can be transported long distances through multiple London boroughs, to areas of high heat demand in those boroughs and, ultimately, central London. This will support the delivery of the UK government's heat network policy and the Mayor's wider net zero ambitions. It aligns strongly with the GLA's Local Area Energy Planning framework and is being proposed for inclusion in the developing London Plan and the London Infrastructure Framework.

If you would like to discuss our ambition around heat networks, transmission mains and relevant mechanisms for their delivery, please contact me at: simon.wyke@london.gov.uk

Yours sincerely

Simon Wyke

Head of Climate Change Mitigation

Greater London Authority

David Carter
Managing Director Heat
Floor 5
10 Dominion Street
London EC2M 2EF

Rob Bristow
Director – Climate, Planning and Transport
Climate and Inclusive Growth
London Borough of Lambeth
020 7926 2201 or 07956 030914
RBristow@Lambeth.gov.uk

23 July 2025

To whom it may concern,

Re: Letter of Support – Heat Main 1

This letter is an expression of the London Borough of Lambeth's support in principle for the proposed "Heat Main 1" project (the "Project") to the extent it can provide strategic infrastructure for low carbon, low-cost heat. This is without prejudice to the Council's interest.

Lambeth Council is committed to becoming a carbon neutral council by 2030, after declaring a climate emergency in 2019. In the context of heat networks, Lambeth is supportive of their development where they can reduce carbon emissions, improve local air quality and improve heat affordability. Additionally, the Council has undertaken the Phase 1 Local Energy Area Planning with a grouping of South London boroughs, where priority strategic heat network areas have been identified.

Heating buildings (homes, commercial, public and industrial) accounts for the largest share of carbon emissions in Lambeth, with nearly 75% of the total. Therefore, the Council believes that decarbonising this heat is essential to achieving its climate objectives as a borough. At the same time, minimising the cost of heat is critical to addressing fuel poverty. Based on the information the Council has been presented, the Project appears to provide an opportunity to address both of these goals by combining waste disposal with carbon capture and storage to harness low-carbon, low-cost, waste heat from Cory's energy from waste facilities at Belvedere, and is therefore supported by the Council in principle.

You will appreciate that as further details are not yet available, the Council has to reserve its position on any formal proposal until it has been able to consider the details of such a proposal at that time.

Yours sincerely,

Rob Bristow

Rob Bristow

Director – Climate, Planning, and Transport
London Borough of Lambeth

David Carter
Managing Director Heat
Floor 5
10 Dominion Street
London EC2M 2EF

Patrick Dubeck
Director of Inclusive Regeneration
Lewisham Council
Catford
London SE6 4RU

patrick.dubeck@lewisham.gov.uk

22 July 2025

LETTER OF SUPPORT - HEAT MAIN 1 – CORY GROUP

Dear David

I am writing to express support for Cory's proposed "Heat Main 1" project.

Lewisham Council's Climate Action Plan sets out our ambitions to accelerate decarbonisation across the borough and support our residents in cutting the costs of staying warm. Investment in new infrastructure will be crucial in achieving these ambitions through the delivery of low-carbon and low-cost heat to our residents.

I am happy to offer support for this project in relation to your plans to seek the Government's designation of Heat Main 1 as a project for which development consent is required under the Planning Act 2008.

Yours sincerely

Patrick Dubeck
Director of Inclusive Regeneration
Lewisham Council

Southwark Council

David Carter
Managing Director of Heat
Floor 5
10 Dominion Street
London EC2M 2EF

Stephen Platts
Director of Planning & Growth
Planning and Growth
Resources
Stephen.platts@southwark.gov.uk
Tel: 020 7525 5640
Date: 23 July 2025

Dear Secretary of State,

Letter of support for London Strategic Heat Main

Southwark Council supports the development of a strategic heat main which would transport waste heat from an Energy from Waste facility into Southwark.

The council would explore the opportunity to harness low-carbon, low-cost, waste heat from this strategic heat source which will support Southwark's transition from gas and help to decarbonise the borough's heating sources, delivering significant carbon savings and a just transition.

Projects that seek to support the development of district heat networks in the borough are aligned with Southwark policy. The Southwark Plan 2022, P70 requires all major developments to connect or future-proof for heat networks. The proposal for a strategic heat main in the borough would support this policy requirement and enable further sustainable growth especially in key opportunity areas.

Southwark is committed to becoming a carbon neutral borough by 2030, having declared a Climate Emergency in 2019. Nearly 80% of Southwark's carbon emissions are related to heat demand in buildings (residential, industrial and commercial). Decarbonising this heat is essential to achieving our climate objectives as a borough. As per the Southwark Climate Action Plan, action E.2 commits the council to replacing gas heat sources with low-carbon heat technologies. This proposal offers an opportunity for the council to deliver against that commitment.

This letter of support does not provide intent of the council to become a heat off-taker as this will need to be assessed and reviewed for financial and practical viability as the infrastructure is developed.

Yours sincerely

Stephen Platts
Director of Planning & Growth

South Westminster Area Network

16 July 2025

To whom it may concern,

Re: Letter of Support – Heat Transmission 1 – Cory Group

The SWAN Partnership (a joint venture between Hemiko and Vital Energi) has been appointed by the Department for Energy Security and Net Zero (DESNZ) to develop the South Westminster Area Network (SWAN). SWAN will become one of the largest heat networks in the UK and will supply low-carbon heating to buildings in and around the Strand, Whitehall, Victoria, Millbank and surrounding areas.

A key constraint in developing and scaling heat networks in London is securing well priced, low carbon heat. We have been in discussion with Cory about the potential to supply heat from Riverside EfW since 2024. This has included technoeconomic evaluation based on heat loads, supply arrangements and potential pricing for heat from a long-range heat transmission main. Heat supply on this basis from Riverside (the “Project”) has the potential to provide the low carbon, low cost heat which SWAN requires.

We support the Project being designated a development for which development consent is required under the Planning Act 2008.

Yours faithfully,

Charlotte Owen
Growth Director
SWAN Partnership

Cory Environmental Holdings Limited
Level 5
10 Dominion Street
London
EC2M 2EF

SSE Energy Solutions
Inveralmond House
200 Dunkeld Road
Perth
PH1 3AQ

Date: 21 July 2025

To Whom it May Concern

Re: Letter of Support – Heat Main 1 – Cory Group

SSE Heat Networks Limited ("**SSE**") is a leading developer of heat networks in the UK. SSE is planning to develop a heat network in central London.

A key constraint in scaling heat networks in London is securing well priced, low carbon heat. Since 2024 we have been having conversations with Cory Environmental Holdings Limited ("**Cory**") regarding the potential to utilise heat from their Riverside EfW facility. This has included high-level technoeconomic evaluation based on heat loads, supply arrangements and potential pricing for heat from a long-range heat transmission main. Heat supply on this basis from Riverside (the "**Project**") has the potential to provide the low-carbon, low-cost heat which our network would require.

We support the Project being designated a development for which development consent is required under the Planning Act 2008.

This letter may be disclosed by Cory in connection with an application under the Planning Act 2008, or otherwise with SSE's express permission.

Yours faithfully,

Nathan Sanders (Jul 21, 2025 07:56 GMT+1)

Nathan Sanders
Director
SSE Heat Networks Limited

From: Vattenfall Heat UK

To whom it may concern

Re: Letter of Support – Heat Main 1 – Cory Group

Vattenfall is a leading heat network developer and is working with Cory on the Riverside Heat Network ("RHN"), a project that would see up to 21,000 homes being heated in south east London with recovered waste heat from Cory's Riverside EfW facilities ("Riverside"). Vattenfall and Cory have been working together since 2020 on the RHN, receiving a £1.6m commercialisation grant from the Heat Network Investment Project ("HNIP") in 2021.

While RHN has the capacity to supply significant heat, we are aware that there is additional heat potential at Riverside, and a project is under development to explore long range transmission of this heat towards central London (the "Project"). The Project has the potential to provide resilience and cost sharing opportunities for the RHN, as well as opening up an ecosystem in which other heat sources may become available to supply the RHN heat distribution area.

We support the Project being designated a development for which development consent is required under the Planning Act 2008.

Yours faithfully

DocuSigned by:
Alina Gheorghiu-Currie
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Alina Gheorghiu-Currie

Director of Heat Networks - London

Vattenfall Heat UK

Annex Two: Heat Main 1, Indicative Route

Indicative route of Heat Main 1 showing both a trunk (green line) and branches (blue arrows) that could serve district heat networks and/or other offtakers.

Annex Three: Draft Direction

DIRECTION BY THE SECRETARY OF STATE UNDER SECTION 35(1) OF THE PLANNING ACT 2008 (AS AMENDED) RELATING TO THE RIVER THAMES FLOOD ALLEVIATION SCHEME

By [*email/letter*] to the Secretary of State received on [*date 2025*] Cory Environmental Holdings Limited (the "**applicant**") formally requested that the Secretary of State exercise the power vested in the Secretary of State under section 35(1) of the Planning Act 2008 (as amended) (the "**Planning Act**") to direct that the proposed project known as Heat Main 1 as set out in the applicant's [*email/letter*] and supporting submissions (the "**proposed scheme**") be treated as a project of national significance which includes development for which development consent is required, as set out in section 4 of the [*email/letter*].

The Secretary of State has made a decision within the primary deadline set out in section 35A(2) of the Planning Act and wishes to convey that decision.

Having considered the applicant's request and the details of the proposed scheme, the Secretary of State is satisfied that:

- the proposed scheme incorporates projects which do not fall into the category of projects described in section 14 of the Planning Act 2008;
- that therefore the proposed scheme does not currently automatically fall within the definition of a "nationally significant infrastructure project" ("**NSIP**") and therefore it is appropriate to consider use of the power in section 35;
- the parts of the proposed scheme that are requested to be development for which development consent is required either are, or are part of, a project in the field of energy and will be wholly within England; and
- the applicant's request therefore constitutes a "qualifying request" in accordance with section 35ZA(1).

In coming to this conclusion, the Secretary of State notes that the proposed scheme relates to the construction of heat transmission infrastructure and thus sits within one of qualifying infrastructure fields listed in section 35(2)(a)(i) – energy - of the Planning Act.

The Secretary of State notes that the proposed scheme encompasses the following development:

- the Tunnels;
- the Heat Transmission Pipelines;
- the Shafts;
- the Bridging Pipework;
- the Distribution Connecting Apparatus; and

- the Utility Tunnel

as detailed in sections 2 and 4 of the [*email/letter*] (together the "**PNS development**"), which will transfer heat derived from facilities at the Riverside Campus (as shown in section 1 of the [*email/letter*]) (the "**Riverside Campus**");

- the delivery of "associated development" (within the meaning of section 115(1)(b) of the Planning Act) including, but not limited to, the Riverside Campus Infrastructure (as set out in section 2 of the [*email/letter*]), electricity supply infrastructure where electricity for the proposed scheme is not supplied from the Riverside Campus, construction compounds, and environmental mitigation and enhancement measures (the "**associated development to the PNS development**"); and

- ancillary matters (the "**ancillary development to the PNS developments**").

The proposed scheme does not include the construction of any dwellings as part of the PNS development.

The proposed scheme can therefore be summarised as:

1. the PNS development;

2. the associated development to the PNS developments; and

3. the ancillary development to the PNS developments.

all as detailed in sections 2 and 4 of the applicant's [*email/letter*] Secretary of State received on [*date 2025*].

The Secretary of State considers that the PNS development is genuinely nationally significant and would:

- be complex and substantial, involving extensive infrastructure works and requiring multiple consents; and

- will benefit from the application being determined in a timely and consistent manner by the Secretary of State.

Furthermore, that the PNS development would provide and support:

- the achievement of a net zero economy and the meeting of the challenge set by the IPCC and the CCC to countries around the world;

- the meeting of Government's aspirations for low carbon heat in the UK, as expressed in the UK National Infrastructure Strategy and in its development of regulatory models for heat network development;

- the delivery of key policy expectations in the London Plan and London Environmental Strategy; and

- the decarbonisation of heat supply to at least some 300,000 homes.

THE SECRETARY OF STATE HEREBY DIRECTS that the **PNS development** is to be treated as development for which development consent is required, where the purpose of the development relates to the transfer of heat derived from the Riverside Campus. Any development consent order application for the PNS development may also include any matters that may properly be included in a development consent order (within the meaning of section 120 of the Planning Act) including ancillary matters (section 120(3)), associated development (within the meaning of section 115(2) of the Planning Act) and related housing development (within the meaning of sections 115(4B) and (4C) of the Planning Act).

THE SECRETARY OF STATE FURTHER DIRECTS in accordance with section 35ZA(3)(b) and (5)(b) of the Planning Act that:

- any proposed application for a consent or authorisation mentioned in section 33(1) or (2) of the Planning Act in relation to the PNS development is to be treated as a proposed application for which development consent is required;
- the Overarching Policy Statement for Energy (EN-1) has effect in relation to an application for development consent under this Direction in a manner appropriately equivalent so far as the considerations and impacts described in EN-1 are relevant to the PNS development.

This direction is given without prejudice to the Secretary of State's consideration of any application for a development consent order which is made in relation to all or part of the proposed scheme.

Signed by

[*name of person signing*]

[*position or role of named person*]

Authorised to sign on behalf of the Secretary of State

[*date*]