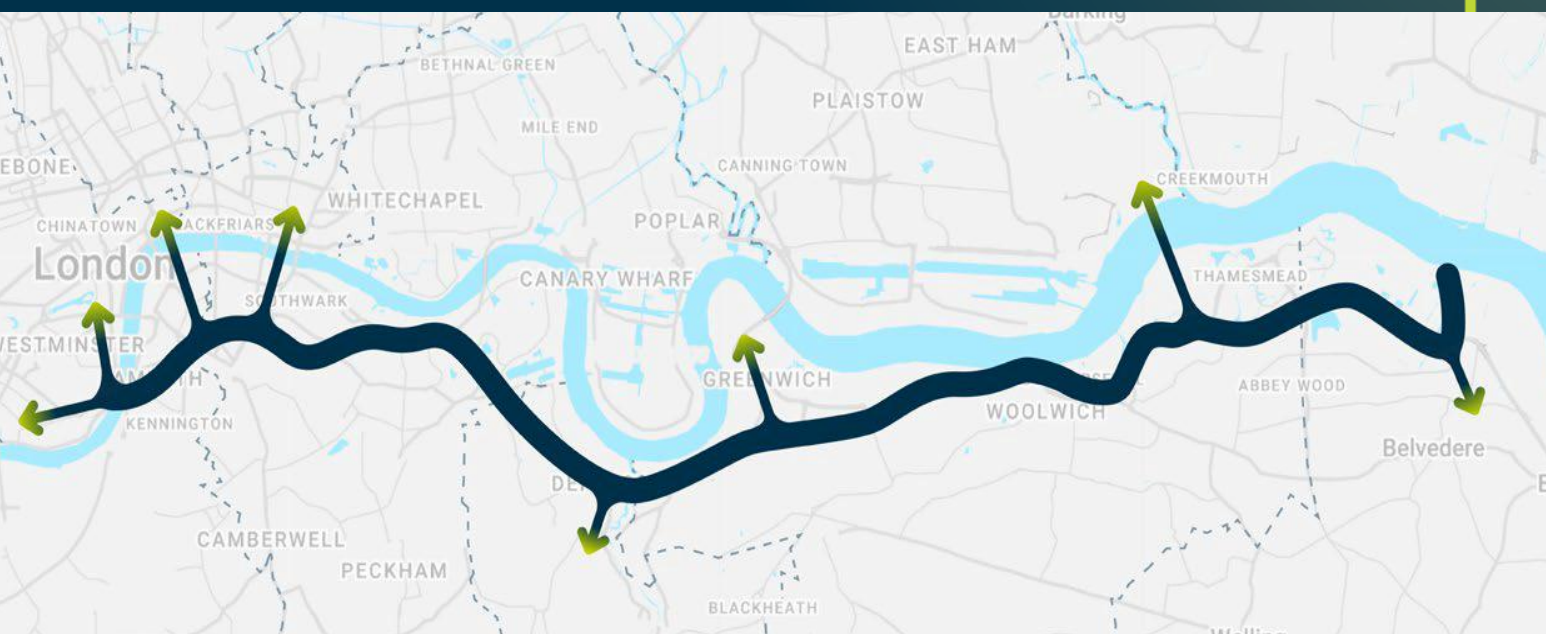


Programme Document

Planning Inspectorate Case Number: EN0710009



July 2026

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1. Introduction

1.1 Purpose of this Programme Document

- 1.1.1 Cory Environmental Holdings Limited ('the Applicant') is preparing an application for a Development Consent Order ('DCO Application') for the London Strategic Heat Main.
- 1.1.2 This Programme Document has been prepared in accordance with the government guidance set out in the 'Planning Act 2008: Pre-application stage for Nationally Significant Infrastructure Projects' first published on 30 April 2024 and the Planning Inspectorate's 'Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus' first published on 16 May 2024. The Programme Document is not a statutory requirement and is not for consultation. This is a 'live' document and will be updated periodically throughout the pre-application stage.
- 1.1.3 The Programme Document outlines the main steps that the Applicant anticipates taking during the preparation of the DCO Application for the London Strategic Heat Main ('Proposed Scheme'). This is primarily for the understanding of all those involved in the pre-application process, in particular for host authorities and statutory consultees to understand the timescales and likely resources required at the pre-application stage.
- 1.1.4 In accordance with the guidance, the Applicant has considered the programme with a view to supporting engagement with host authorities and statutory bodies alongside other stakeholders, where relevant.
- 1.1.5 In accordance with the guidance and the Planning Inspectorate's Prospectus, the Programme Document includes the following:
 - a. **Section 2 Background:** Providing details of the Applicant; the Proposed Scheme; the Planning Act 2008 process; any licences or non-planning consents required; and the policy context for the determination of the DCO Application.
 - b. **Section 3 The Planning Inspectorate's Pre-Application Advice Service:** Containing a statement reflecting the pre-application tier service that the Applicant has subscribed to.
 - c. **Section 4 The pre-application programme:** Providing a visual representation of the timeline of pre-application activities and showing the date on which the Applicant expects to submit the DCO Application.

- d. **Section 5 Main issues for resolution:** A summary of the main issues emerging during the pre-application stage and a statement that the Applicant will produce a 'potential main issues for examination' document for submission.
 - e. **Section 6 Engaging with local authorities and statutory bodies:** Containing a list of the main local authorities and statutory bodies affected by the DCO Application and a summary of how the Applicant is engaging with them.
 - f. **Section 7 Pre-application risks:** A record of the key pre-application stage programme risks identified by the Applicant and an explanation of how they are being tracked and managed.
- 1.1.6 The Applicant will publish the latest version of this Programme Document on its website and, as necessary, update it as it progresses through the pre-application stage.

2. Background to the Proposed Scheme

2.1 The Applicant

- 2.1.1 The Applicant is part of the Cory Group, one of the UK's leading resource management companies, with an extensive river logistics network in London underpinned by a long history and deep connection to the city stretching back to the late 1700s.
- 2.1.2 The Applicant has invested heavily in London's waste recycling, energy generation and river logistics infrastructure. In addition to its commercial customers, the Applicant is a trusted partner for several local authorities in London (serving a combined population of approximately 3 million people). It operates essential infrastructure which London relies heavily upon on a day-to-day basis.
- 2.1.3 Heat supply is firmly recognised as a critical element of energy security and decarbonisation, not least as demonstrated through policy maturity, market regularisation and legislative drivers such as the Energy Act 2023. Through efficient waste management, Cory has for many years exported the recovered energy as electricity to the national grid. Now, the Applicant seeks to respond to national priorities to also export the waste heat generated through its waste management processes.

2.2 The Proposed Scheme

- 2.2.1 The Applicant intends to construct, operate and maintain a heat transmission network known as the London Strategic Heat Main ('London SHM' or 'Proposed Scheme'). The London SHM will transport waste heat from Riverside Campus, located in Belvedere (London Borough of Bexley), westward across London, responding to areas of high heat demand. The London SHM will comprise a Transmission Trunk Main and Transmission Branches that will allow connection to both heat distribution networks and other heat sources.
- 2.2.2 Figure 1 illustrates the indicative routing for the London SHM. The route alignment will typically follow the highway network and the expected construction methodology is to excavate a series of chambers or pits (Maintenance and Access Points, 'MAP') from which tunnel drives will be launched, or received, to install the London SHM. The MAP will have associated construction compounds. The MAP are proposed to be retained (with suitable covers for access, and where necessary

maintenance kiosks and pumping infrastructure) to enable operation and maintenance and also to facilitate possible future heat network connections.

- 2.2.3 Other infrastructure anticipated to be required includes thermal stores, modifications to facilities at Riverside Campus and any required ecological, landscape and public realm works.
- 2.2.4 The Proposed Scheme will traverse the following administrative areas, running from Riverside Campus in the London Borough of Bexley, then crossing Royal Borough of Greenwich, London Borough of Lewisham, London Borough of Southwark, and London Borough of Lambeth, with branches potentially extending into London Borough of Barking and Dagenham, London Borough of Tower Hamlets, City of London Corporation, City of Westminster and the Royal Borough of Kensington and Chelsea.



2.3 The Planning Act 2008 Process

- 2.3.1 The Planning Act 2008 defines certain thresholds for large-scale development in the fields of energy, transport, water or waste. These are listed in Part 3 Sections 14 to 30 of the Planning Act 2008 and are defined as Nationally Significant Infrastructure Projects (NSIP). The Proposed Scheme does not fall within the current definition of a NSIP as defined in the Planning Act 2008, however, Section 35(1) of the Planning Act 2008 provides the Secretary of State with power to direct that a specific project should be treated a development for which development consent is required under the Planning Act 2008.
- 2.3.2 Given that the Proposed Scheme does not fall within the current definition of a NSIP, the Applicant submitted a qualifying request for a direction from the Secretary of State for Energy Security and Net Zero (Secretary of State), under section 35 of the Planning Act 2008, in relation to the Proposed Scheme. On the 27th August 2025, the Secretary of State confirmed, through a section 35 direction¹, that the London Strategic Heat Main is of national significance and is to be treated as development for which development consent is required under Planning Act 2008 (as amended).
- 2.3.3 Following the section 35 direction, the Applicant is now preparing an application for development consent to be determined by the Secretary of State for Energy Security and Net Zero.
- 2.3.4 The development consent application process comprises six stages, which are briefly summarised below:
- a. Pre-application: Consultation; preparation of environmental and technical assessments; and engagement with the Planning Inspectorate.
 - b. Acceptance: The Planning Inspectorate's determination on whether to accept the application for examination.
 - c. Pre-examination: Interested Parties can register to participate in the examination and a Preliminary Meeting is held to discuss how the examination will run.
 - d. Examination: The Examining Authority will examine the application over a period of up to six months. This is largely a written process where written

¹ <https://assets.publishing.service.gov.uk/media/68af03cd9e1ceb2c96a204/cory-heat-main-1-section-35-direction.pdf>

representations are submitted by Interested Parties and the Applicant. Hearings are also held for the Examining Authority to hear oral evidence on environmental matters, compulsory acquisition and issues raised by Interested Parties at Open Floor Hearings.

- e. Recommendation: Examining Authority prepares a Recommendation Report for the Secretary of State within three months from the close of examination
- f. Decision: Secretary of State then has three months to issue a decision.

2.4 Required Licences and Non-Planning Consents

- 2.4.1 At this stage it is too early to confirm the full extent of works and powers and associated disapplications that will be sought by the DCO Application. This will be reviewed during the pre-application stage and this Programme Document updated with relevant information.

2.5 Policy Context

- 2.5.1 The section 35 direction for the London Strategic Heat Main confirmed that it is a project of national significance, in the field of energy and is to be treated as development for which development consent is required. Sections 103 to 107 of the Planning Act 2008 provide the framework for decision making Development Consent Order (DCO) applications. Section 104(2) provides that, in deciding applications for development consent, the Secretary of State must have regard to the relevant National Policy Statements (NPS). Section 104(3) states that the Secretary of State must decide such applications in accordance with any relevant NPSs unless the exceptions at Section 104(4) to (8) apply. In the case of the Proposed Scheme, which is a project in the field of energy, the Secretary of State will therefore need to determine the application in accordance with the Overarching National Policy Statement for Energy (NPS EN-1) which came into force on 6 January 2026. NPS EN-1 explains at paragraph 1.3.10 that *'EN-1, in conjunction with any relevant technology specific NPS, will be the primary policy for Secretary of State decision making on projects in the field of energy for which a direction has been given under section 35'*.
- 2.5.2 The Secretary of State will also consider other important and relevant matters relevant to its decision. Policies within adopted and emerging development plans are frequently considered to be important and relevant matters by the Secretary of State and can influence the content of Local Impact Reports, which the Secretary of State will also have regard to in their decision in accordance with Section 104(2)(b) of the Planning Act 2008.

2.5.3 The adopted local plans relevant to the Proposed Scheme comprise the plans listed in Table 1 below:

Table 1: Adopted and neighbourhood local plans

Planning Authority	Adopted Development Plan Document	Date of adoption
London Borough of Bexley	Bexley Local Plan	26 April 2023
Royal Borough of Greenwich	The Core Strategy with Detailed Policies	30 July 2014
London Borough of Lewisham	New Lewisham Local Plan 2020-2040	16 July 2025
London Borough of Southwark	The Southwark Plan 2022	23 February 2022
London Borough of Lambeth	Lambeth Local Plan	22 September 2021
	South Bank & Waterloo Neighbourhood Plan 2017 – 2032	16 December 2019
	Kennington, Oval and Vauxhall Neighbourhood Plan 2035	January 2026
London Borough of Barking and Dagenham	Barking and Dagenham 2037 Local Plan (including Appendix 2 Site Allocations)	18 September 2024
London Borough of Tower Hamlets	Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits	15 January 2020
City of London Corporation	Local Plan 2015	15 January 2015
	City Plan 2019-2040 (2026)	21 January 2026
City of Westminster	Victoria Neighbourhood Plan 2025-2040	07 January 2026
Royal Borough of Kensington and Chelsea	New Local Plan Review	24 July 2024
Greater London Authority	London Plan	2 March 2021

3. The Planning Inspectorate's Pre-Application Service

- 3.1.1 The Applicant is seeking to engage with the basic 'Tier 1' pre-application service, given that the Applicant and its supporting team have extensive experience in the Planning Act 2008 consenting process.
- 3.1.2 The service took effect from March 2026. The details of the services provided by the Planning Inspectorate are set out in the Nationally Significant Infrastructure Proposed Scheme's: 2024 Pre-application Prospectus which can be found [here](#).
- 3.1.3 The Applicant is seeking to progress the DCO Application through conventional Planning Act 2008 timescales.

4. The Pre-Application Programme

- 4.1.1 The DCO Application is anticipated to be submitted in March 2028. The pre-application timetable is set out in Table 2 below.
- 4.1.2 The Planning and Infrastructure Act 2025 came into effect in December 2025. This removes (once commenced) the statutory consultation requirements associated with a DCO and associated activities, deliverables and some publicity requirements. The documents and processes no longer required include: (i) the formal publication and publicity of a Statement of Community Consultation and (ii) statutory consultation with prescribed consultees, land interests and the general public on preliminary environmental information.
- 4.1.3 The Applicant is currently in the initial stages of the pre-application process with early engagement activities with host authorities and key statutory bodies having commenced in April 2026. In addition to on-going engagement with relevant parties, the Applicant is also proposing two consultation periods with the general public, other land interests and other statutory/non statutory bodies during the pre-application programme.
- 4.1.4 As noted above, the Applicant is progressing the DCO Application using the basic tier pre-application service provided by the Planning Inspectorate. The Applicant is therefore entitled to three meetings with the Planning Inspectorate during the pre-application phase. Whilst dates for the second and third meetings have not been confirmed at this stage the meetings are proposed during the following months:
 - a. Inception Meeting (took place March 2026);
 - b. Pre-consultation (January 2027); and
 - c. Pre-submission (September 2027).

Table 2 Current Pre-Application Timetable

Stage	Activity	Completed/Anticipated Date
Section 35 Direction	Section 35 request made	31 July 2025
	Section 35 direction received	27 August 2025
Pre-Application Launch	Planning Inspectorate Inception Meeting	26 March 2026
	Introductory meetings with host authorities and statutory bodies	April to May 2026
Environmental Impact Assessment (EIA) Scoping	Submission of EIA scoping report to Planning Inspectorate	July 2026
	EIA scoping opinion received	August 2026
Ongoing engagement	Continued engagement with host authorities and selected statutory bodies	April 2026 to April 2028
	Engagement with political stakeholders	
Consultation 1	Consultation stage for general public, land interests and other statutory/non statutory bodies	February to March 2027
Consultation 2	Consultation stage for general public, land interests and other statutory/non statutory bodies	September to October 2027
Preparation of DCO Application	Preparation of the Environmental Statement	October 2027 to February 2028
	Preparation of other supporting application documents and plans	
DCO Application submission	Submission of the DCO Application to the Planning Inspectorate	March 2028

5. Main Issues for Resolution

- 5.1.1 With the launch of pre-application stage engagement in April 2026, the Applicant is currently unable to set out the main issues emerging during the initial stages of engagement, and subsequent activities planned to facilitate the resolution of identified issues.
- 5.1.2 Through its understanding of the Proposed Scheme and its location, the Applicant does however anticipate that currently the potential main issues for discussion during the pre-application process are likely to include:
- a. routeing of the Transmission Main Trunk and Branches and siting of the MAP, construction compounds and thermal stores;
 - b. the approach to managing traffic impacts and the undertaking of street works during construction including the modification of existing statutory regimes;
 - c. the approach to the delivery and disposal of construction materials;
 - d. noise and vibration (including settlement) and dust impacts and management during construction;
 - e. visual impacts during construction;
 - f. interaction of the Proposed Scheme with the public realm;
 - g. interaction of the Proposed Scheme with existing and proposed infrastructure;
 - h. the approach to land powers in the context of the unique nature of the scheme; and
 - i. impacts on designated heritage assets (including buried archaeology).
- 5.1.3 Table 3 provides further details of the main issues currently identified and the proposed activities which are outlined to resolve these main issues.

Table 3 Proposed Activities to resolve main issues

Issue	Summary of Issues	Proposed Activities
Routeing of the Transmission Main Trunk and Branches and siting of the MAP, construction compounds and thermal stores.	The route alignment will, where practicable, follow the highway network, and the expected construction methodology is to excavate a series of chambers or pits (Maintenance and Access Points, 'MAP') from which tunnel drives will be launched, or received, to install the London SHM.	The Applicant is currently undertaking a detailed process of routeing and siting that will be explained in future engagement and consultations with local planning authorities, technical consultees, land interests and the general public and in the DCO Application to demonstrate the choices made and alternatives considered in accordance with relevant legislation, policy and guidance.
Temporary Construction Phase impacts	The approach to managing traffic impacts and the undertaking of street works during construction including the modification of existing statutory regimes.	The Applicant will identify receptors through baseline characterisation and survey work in relation to visual, noise and vibration, human health, contaminated land, waste and traffic. The Applicant will undertake impact assessments of the Proposed Scheme on visual, noise and vibration, human health, contaminated land, waste and traffic receptors. The Applicant is currently developing its approach to construction management and operation and will engage with the host local authorities and where relevant, other prescribed consultees, regarding the development of management regimes that are appropriate to the cross-borough nature of the Proposed Scheme. The Applicant will develop mitigation measures set out in outline management plans covering construction environmental
	The approach to the delivery and disposal of construction materials.	
	Noise and vibration (including settlement) and dust impacts and management during construction.	
	Visual impacts during construction.	

Issue	Summary of Issues	Proposed Activities
		management (air quality and dust, contaminated land, noise, waste etc), construction traffic management and access management which will be secured via the DCO.
Interaction of the Proposed Scheme with the public realm.	Potential impact on local recreational areas and non-designated open space, with potential opportunities to enhance the public realm where the possible.	The Applicant will identify receptors through baseline characterisation and survey work. The Applicant will develop design principles at both a scheme wide, and where appropriate, at a local level to help guide public realm reinstatement. The Applicant will develop landscape and ecological management measures for the construction phase which will be secured via the DCO.
Interaction of the Proposed Scheme with existing and proposed infrastructure.	London is a dense urban area and contains a high proportion of above and below ground infrastructure, including existing utilities and transport infrastructure such as London Underground tunnels	The Applicant will identify existing and proposed infrastructure interacting with the Proposed Scheme This information will feed into detailed process of routeing and siting that will be explained in future engagement and consultations with asset owners.
The approach to land powers in the context of the unique nature of the scheme.	Securing land rights or control over the proposed MAP locations and subsoil, leading to potential legal disputes or delays.	Conduct a thorough due diligence on land interests. Undertake early engagement is undertaken with directly affected land interests to negotiate agreements. Develop clear approach to acquisition of subsoil and management of settlement risk.
Impacts on designated cultural heritage assets (including buried	The potential for likely significant adverse effects to designated and non-designated cultural heritage	The Applicant will identify receptors through baseline characterisation and survey work.

Issue	Summary of Issues	Proposed Activities
archaeological assets).	assets and buried archaeological assets along the route alignment.	The EIA Scoping process being undertaken will set out the proposed scope of the cultural heritage assessment to be included within the Environmental Statement. Design and mitigation measures will be incorporated within the Proposed Scheme to avoid and/or mitigate harm to cultural heritage assets. Outline management plans and outline Written Schemes of Investigation (WSIs) will be developed with input from technical consultees to be submitted with the application, setting out the mitigation (including evaluation) and management measures to be employed.

- 5.1.4 Good design will be incorporated into the Proposed Scheme to balance flexibility within the project with the expectations of NPS EN-1 in relation to design ambition, placemaking outcomes and minimising potential development impacts. Engagement on the design process and nature of design governance through the life of the Proposed Scheme will be undertaken, not least through sharing project objectives and design principles from an early stage.
- 5.1.5 The Applicant is also currently developing its approach to construction management and will engage with the local authorities and relevant statutory bodies regarding the assessment of construction impacts and proposed mitigation measures, with an aim of identifying a project wide approach to key issues. It will also undertake an engagement programme in respect of how the DCO will interact with existing statutory regimes for managing street works in London.
- 5.1.6 To inform the Examining Authority of the main issues considered during the pre-application phase by local authorities and statutory bodies, the Applicant will be producing a 'Potential Main Issues for Examination' document for submission.

6. Engagement with Local Authorities and Statutory Bodies

6.1.1 The main local authorities likely to be affected by the Proposed Scheme include:

- a. London Borough of Bexley;
- b. Royal Borough of Greenwich;
- c. London Borough of Lewisham;
- d. London Borough of Southwark;
- e. London Borough of Lambeth;
- f. London Borough of Barking and Dagenham;
- g. London Borough of Tower Hamlets;
- h. City of London Corporation;
- i. City of Westminster; and
- j. Royal Borough of Kensington and Chelsea.

6.1.2 The Greater London Authority ('GLA') is also relevant, given its role as a strategic regional authority across Greater London.

6.1.3 Pre-application engagement with the local authorities noted above and the GLA commenced in April 2026 where the team, the Proposed Scheme, timescales; the approach to engagement and consultation; and ways of working, were introduced.

6.1.4 Initial engagement with the following statutory bodies also commenced in April 2026:

- a. Transport for London;
- b. Port of London Authority;
- c. Historic England (and Greater London Archaeological Advisory Service);
- d. Environment Agency;
- e. Marine Management Organisation;
- f. Natural England; and
- g. Health and Safety Executive.

6.1.4 The Applicant will collaborate with local authorities, the GLA and the abovementioned statutory bodies to resolve issues where practicable, with this

engagement work informing the Potential Main Issues for Examination document submitted as part of the DCO Application.

- 6.1.5 The Applicant intends to enter into Planning Performance Agreements ('PPA') with the local authorities and the GLA, which will dovetail with the statutory charging regime that has now been introduced for local authorities.
- 6.1.6 Particularly, it is proposed that thematic engagement meetings are held with relevant officers from the local authorities and relevant statutory bodies noted above to address:
- a. traffic;
 - b. environmental health (covering noise, vibration, and air quality);
 - c. water resources and flood risk;
 - d. built heritage/public realm/townscape and visual matters;
 - e. ecology and arboriculture;
 - f. buried archaeology; and
 - g. planning matters relevant to the Proposed Scheme.
- 6.1.7 Engagement with political members is proposed on a quarterly basis.
- 6.1.8 The Applicant will engage with the local authorities, GLA and statutory bodies noted above to discuss the approach to impact assessment including baseline gathering, the construction methodology and proposed mitigation measures, and to allow parties to engage with the design process to then identify the main issues associated with the Proposed Scheme. The Applicant will collaborate with the authorities to resolve issues where possible with this engagement work informing the Potential Main Issues for Examination document submitted as part of the DCO Application.

7. Pre-Application Risks

7.1 Risk identification and management

- 7.1.1 The current pre-application timetable has been informed by the Proposed Scheme team's cumulative knowledge and experience in regard to the pre-application process and DCO applications.
- 7.1.2 Throughout the pre-application process, the Applicant will continue to review the requirements of the Planning Act 2008, relevant regulations, policies, guidance documents, and Planning Inspectorate Advice pages to ensure the compliance of the DCO Application, including delivery of effective pre-application engagement.
- 7.1.3 The Applicant is aware that potential changes to the consultation process may occur throughout delivery of the pre-application programme given the introduction of the Planning and Infrastructure Act 2025. It is prepared to respond to any changes in this regard and is designing its processes to be able to respond to these changes.
- 7.1.4 Risks to the delivery of the pre-application programme are being recorded, monitored, and managed appropriately in a project risk register.
- 7.1.5 The principal risks to the timetable identified at this stage include:
 - a. **Resource capacity of stakeholder organisations** – timely and effective engagement with stakeholder organisations at this early stage and throughout the process is important so that feedback can influence the proposals. The Applicant will secure this engagement through PPA and other cost recovery agreements.
 - b. **Design change** – recognising that the market is continuing to evolve as organisations respond to the Energy Act 2023 and its successors, there is potential for change in the design, particularly the addition or deletion of Transmission Branches. The Applicant will keep these under close scrutiny, ensuring that policy and assessment is consistently applied.

7.2 Issues tracker

- 7.2.1 The Applicant will maintain an Issues Tracker with each host authority and the statutory bodies noted above in accordance with the 'Nationally Significant Infrastructure Projects: 2024 Pre-application Prospectus', building on the matters set out in Table 3.
- 7.2.2 The issues identified will be managed and monitored by the Applicant throughout the pre-application stage. The identified issues will carry a Red, Amber, Green status that reflect the degree of risk with each issue, as well as the Applicant's intended approach to resolve the issues. The Issues Tracker will be used to prepare a list of Potential Main Issues for the Examination, which will be submitted with the DCO Application.