Our ref: AA.25.01.40 / DCOLIGFP
Your ref: NH/24/05398

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19th November 2025

FAO: Stephanie Newman

Dear Sir/Madam,

Development Consent Order [DCO] Lighthouse Green Fuels

Thank you for engaging with National Highways regarding this DCO application. We have reviewed the EIA Scoping Report and would offer the following comments. Detailed comments are provided in the attached Technical Memorandum referenced TM01, dated 19 November 2025 and provided by JSJV on our behalf. We would note that this DCO application is currently at the pre-application stage.

We welcome the consideration of DfT Circular 01/2022, National planning Policy Framework [NPPF] (2024) and Planning practice Guidance in the preparation of the EIA Scoping Report and the upcoming Environmental Statement [ES].

We would withhold comment on the study area until the traffic flow diagrams have been shared with National Highways. We would, however, note that A19(T)/A689 Interchange is subject to a significant cumulative impact from committed development in Hartlepool's and Stockton's authorities.

National Highways would direct the Applicant to the Department for Transport [DfT] Mapping Application for Visualising Road Injury Casualties [MAVRIC] tool (available at: https://www.arcgis.com/apps/dashboards/ea3b071df62a434aa21ed80a6214d690). Subject to study area including the SRN, National Highways would state that there may be a need for a baseline assessment of the relevant SRN sections.

It is proposed that a Transport Assessment [TA], Outline Construction Traffic Management Plan [CTMP] and Outline Construction Worker Travel Plan [CWTP] will be prepared and appended to the ES. National Highways would support this approach and would reiterate that these documents should be prepared in accordance with DfT Circular 01/2022 and NPPF (2024).

Considering the land use, scale and location of development, National Highways would agree that the most significant environmental Traffic and Movement effects will occur as a result of construction traffic. We agree that the most significant environmental Traffic and movement effects will occur during the construction phase of the proposed development.

Consequently, the approach to scope in AILs and construction traffic, while scoping out operational and decommissioning traffic is considered appropriate by National

Highways. We agree with the approach that the assessment methodology to be used to determine the potential Traffic and Movement effects of the proposed development within the study area to follow IEMA guidelines, as set out in 'Environmental Assessment of Traffic and Movement' (2023).

Prior to any abnormal loads being delivered to the site via the SRN, the Applicant should contact the National Highways Abnormal Loads Team in advance to discuss the details any abnormal load(s). Swept path analyses must also be provided for any AIL movements via the SRN.

I trust this response is helpful, but should you require any further information please do not hesitate to contact me.

Yours sincerely.

Rebecca Garrett
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Technical Memorandum

DCO Lighthouse Green Fuels

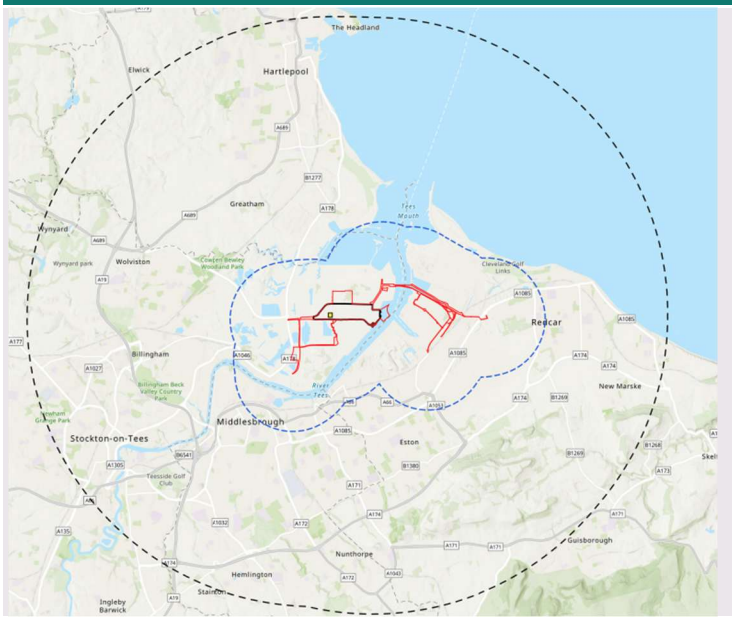
Case ref:	DCOLIGFP	Document ref:	TM02	Date issued:	18/11/2025
Prepared for:	Becky Garrett	Prepared by:	John Williams	Reviewed / approved by:	Andy Tennant / James Finch

Headline summary

Planning outcome

*The recommendation to National Highways is **Pre-application / Scoping Response**. Comments are made on the pre-application / scoping in order to assist defining an appropriate assessment of the Strategic Road Network.*

Site location



Technical summary

- JSJV would agree with the approach that the assessment methodology to be used to determine the potential Traffic and Movement effects of the proposed development within the study area to follow IEMA guidelines, as set out in 'Environmental Assessment of Traffic and Movement' (2023);
- JSJV would suggest that the approach to scope in AILs and Construction Traffic, while scoping out operational and decommissioning traffic is appropriate;
- JSJV would suggest that prior to any abnormal loads being delivered to the site that the Applicant should contact the National Highways Abnormal Loads Team in advance to discuss the details any abnormal load(s); and,
- JSJV would support the preparation of the CTMP and CWTP and would suggest that they should be prepared in accordance with the policy requirements of Circular 01/2022 and NPPF (2024).

1 Overview

1.1 On behalf of National Highways, the Jacobs Systra Joint Venture [JSJV] has undertaken a review of a Nationally Significant Infrastructure Project [NSIP]. The following information has been provided and is the subject of this review:

- Environmental Scoping Report.

1.2 The proposal seeks the development of:

"Second generation SAF production, pre-treatment, processing and storage plant; marine infrastructure, pipelines for export of finished product to marine or rail loading infrastructure; biomass-fired Combined Heat and Power (CHP) plant with an electrical output capacity of up to approximately 200Mwe with additional steam production for SAF production; pipelines for utilities including for the supply of raw water, potable water, natural gas, oxygen and nitrogen; wastewater treatment and discharge; an electricity connection; air separation unit (ASU) for alternative provision of oxygen and nitrogen; feedstock, intermediates and product bulk storage; and other associated and ancillary infrastructure."

1.3 On the basis of this review, this JSJV Technical Memorandum [TM] comments on the suitability of the information with discussion provided in relation to the details relevant to understanding the impacts of the proposals at the Strategic Road Network [SRN].

2 Previous Review

2.1 In June 2024, JSJV previously undertook a review of a Preliminary Environmental Information Report [PEIR] Chapter 16 (Traffic and Transport) for a development consent order at the same location and for a similar land use (now withdrawn). JSJV proposed the following next steps:

- The final calculation of vehicle trips generated by construction vehicles and construction workers (including profiling) will be carried out.
- The Traffic and Transport effects will be detailed and scoped with STBC, RCBC, and National Highways to agree the transport parameters to be fully assessed in the Traffic and Transport Chapter in the ES. Further assessment work will be undertaken to address the uncertainties contained in this PEIR.
- The final calculation of vehicle trips generated by construction vehicles and construction workers (including profiling) will be carried out.
- JTCs and ATCs will be undertaken on the surrounding highway network.
- The theoretical capacity of existing junctions within a Study Area agreed by STBC and National Highways will be undertaken.
- A full review of committed development and cumulative impacts will be carried out and reported in the ES.
- It is proposed that the following documents will be produced as part of the DCO application:
  - ES – Traffic and Transport Chapter;
  - Transport Assessment (TA);
  - Outline Construction Traffic Management Plan (CTMP); and
  - Construction Worker Travel Plan (CWTP).
- A Statement of Common Ground (SoCG) will be prepared in relation to the Traffic and Transport impacts with the relevant highway authorities.

2.2 In August 2025, a Direction Request was submitted by the Applicant [LGF Projects Limited] for this proposed development. In September 2025 a meeting was held between Lighthouse Green Fuels [the Applicant], their transport consultants [Arup], JSJV and National Highways to discuss the application and next steps.

3 Policy

3.1 JSJV supports the inclusion of the following policies in the preparation of the Environmental Scoping Report:

- National Planning Policy Framework [NPPF] (2024);
- DfT Circular 01/2022; and,
- Planning Practice Guidance [PPG].

4 Study Area

4.1 The EIA Scoping Report states that the study area will be based upon the anticipated 'worst case' scenario whereby the greatest level of construction activities are expected to be occurring at the same time. It is proposed that the study area will be refined as further information is made available and the proposed development's traffic and movement characteristics are fully developed, including cumulative impacts and AILs.

4.2 JSJV would note that when National Highways was consulted previously [TM01] to review the superseded DCO application, the following study area was proposed:

- Junction 6 – A19 Portrack Interchange
- Junction 9 – A19 Norton Interchange
- Junction 10 – A19/A139 Junction
- Junction 13 – A689/A1185/A19 Southbound Off-Slip Roundabout
- Junction 14 – A19/Wolviston Interchange
- Link 15A – A19/Wynyard Park Southbound Off-Slip
- Link 15B – A19 Wolviston Interchange Northbound On-Slip
- Link 18 – A19 Mainline (North of A19 Wolviston Interchange)
- Link 34 – A19 Mainline (Between A19 Wolviston Interchange and A19 Norton Interchange)
- Link 41 – A19 Mainline (South of A19 Portrack Interchange)
- Link 43 – A19 Mainline (North of A19 Portrack Interchange)

4.3 JSJV would withhold comment on the study area until the traffic flow diagrams have been shared with National Highways. We would, however, note that A19(T)/A689 Interchange is subject to a significant cumulative impact from committed development in Hartlepool's and Stockton's authorities. A traffic queue at this junction of three-quarters the length of an off-slip road, or greater, would represent a severe impact on road safety as this would see the back of the queue located close to the diverge from the mainline.

Baseline

4.4 It is proposed that a comprehensive review of all available baseline information will be undertaken as part of the Traffic and Movement assessment in the Environmental Statement, including motorised traffic movements, pedestrian and cycle infrastructure, accident data and public transport provision.

4.5 It is proposed that accident data will be derived using the 'Crashmap' platform. JSJV would direct the Applicant to the Department for Transport [DfT] Mapping Application for Visualising Road Injury Casualties [MAVRIC] tool (available at: https://www.arcgis.com/apps/dashboards/ea3b071df62a434aa21ed80a6214d690).

4.6 Subject to study area including the SRN, JSJV would suggest that there may be a need for a baseline assessment of the relevant SRN sections.

5 Mitigation and Measures

Construction Phase

5.1 The EIA Scoping Report proposes that the following documents will be produced which will contain relevant design, mitigation and enhancement measures:

- Outline Construction Traffic Management Plan [CTMP]: providing details of procedures for construction related traffic, including number of vehicles, routes, frequency and timing of movements, worker hours and shift patters, laydown areas, parking and AILs; and,
- Outline Construction Worker Travel Plan [CWTP]: focus on minimising the traffic impacts associated with construction with construction workers traveling to and from Site.

5.2 JSJV would support the preparation of the above documents and would suggest that the CTMP and CWTP should be prepared in accordance with the policy requirements of Circular 01/2022 and NPPF (2024). JSJV would comment that the CTMP will need to include at least the following:

- Length of construction period;
- Hours of operation;
- Peak hour trip generation (including type of vehicles);
- Construction traffic routes;
- Access arrangements (i.e. measures to avoid the A19 access);
- Staffing numbers;
- Contractor parking;
- Details of delivery arrangements (including for any abnormal loads); and
- Mitigation measures – limited delivery times (and details of enforcement e.g., penalty clauses for contractor, noise reduction, wheel washing).

5.3 JSJV would expect the following to be included:

- Firm financial commitments with regards to funding for the measures proposed;
- Targets for mode shift and vehicular trip generation, which should be taken forward into the Transport Assessment;
- A sustained monitoring and management strategy to confirm that vehicle trip targets are being met (in line with PPG); and
- A plan detailing the remediation process in the event that targets are not being met.

Operation Phase

5.4 The EIA Scoping Report considers that no design, mitigation, or enhancement measures will be required as the operational phase will likely not give rise to any significant environmental Traffic and Movement effects. Considering the land use of

the proposed development and the Site's location in relation to the SRN, JSJV would suggest the above approach is appropriate.

Abnormal Loads

5.5 It is proposed that AILs will primarily be transported to the Site via the sea using the new quay for transport for the Site. However, the EIA Scoping Report states that smaller AILs will be required to be transported via road. It is stated that:

> *"Traffic management measures will be agreed with the highways owners and the Police in advance of the construction commencement. This will most likely involve engagement with the Local Authority and/or Highways England. As part of this process agreements will be made in regard to timings of AIL movements (i.e. late-night movements to minimise impacts on the road network) and any temporary removal of road furniture which may be required for the transportation of the AILs (i.e. temporary removal of street lights, signs or signalling equipment)."*

5.6 JSJV would suggest that prior to any abnormal loads being delivered to the site via the SRN that the Applicant should contact the National Highways Abnormal Loads Team in advance to discuss the details any abnormal load(s).

5.7 JSJV would direct the Applicant towards National Highways' Electronic Service Delivery for Abnormal Loads (ESDAL) system that must be used to notify National Highways, the local highway authorities and the Police of ALL movement details, times, types and route: https://nationalhighways.co.uk/road-safety/abnormal-loads-and-the-esdal-system/. The ESDAL system must be used to notify the aforementioned authorities prior to the departure of each AIL. A full road condition survey of any proposed AIL delivery route must also be undertaken both before and after delivery. The method of the surveys will be discussed and agreed with the relevant highway authorities prior to being undertaken. Swept path analyses must also be provided for any AIL movements via the SRN.

6 Likely Significant Effects

Sensitive Receptors

6.1 It is proposed that sensitive receptors as part of the Traffic and Movement assessment will fall into one of two categories:

- Motorised Users [MU]; and,
- Non-Motorised Users [NMU].

Construction Phase

6.2 The EIA Scoping Report has set out the likely significant effects for traffic and movement in the construction phase.

Table 1: Traffic and movement – likely significant effects

Environmental Impacts	Description	Receptor Type
Driver Delay	Increases in traffic flows on existing roads can lead to traffic delays to non-development traffic which can occur at: • Key roads within the Study Area where there may be additional concentrations of traffic flow • Key junctions on the highway network near the Site	MU & NMU

Road Safety	The impact of the Proposed Development will be assessed in terms of its likely effect on the existing accident record and any potential increase in the number of accidents.	MU & NMU
Fear and Intimidation	Fear and intimidation criteria are considered to be dependent on the volume of traffic, the proportion of HGVs, proximity to people and any deficiencies in protection offered which can be caused by issues such as narrow pavement widths	NMU
Severance	Severance can occur when there is a perceived division within a community which becomes separated by a major traffic route. The assessment of severance considers specific local conditions and, in particular, the local pedestrian routes to key local facilities including crossings.	NMU
Pedestrian Amenity	Some developments can bring about increases in the number of vehicle and pedestrian movements which can lead to greater increases in delay to pedestrians seeking to cross the road.	NMU

6.3 JSJV would suggest that the likely significant effects for Traffic and Movement generated during the construction phase are appropriate.

Operational Phase

6.4 The EIA Scoping Report states:

> *"Due to the most significant impacts being likely to occur during the construction phase, it is considered that the environmental impacts relating to potential movements of materials, plant and workers during the operational phase can be scoped out."*

6.5 JSJV would suggest that the proposed approach is appropriate.

Decommissioning Phase

6.6 The EIA Scoping Report states:

> *"While the traffic volumes associated with the decommissioning phase are not yet known at this stage, it is expected that they will be less than that of construction traffic volumes and, on that basis, it is considered that undertaking an assessment of the construction phase will provide a clear understanding of any potential impacts without the need to undertake a separate decommissioning assessment."*

6.7 JSJV would suggest that the proposed approach is appropriate.

Scoping In / Out

6.8 It is proposed within the EIA Scoping Report that the following elements will be scoped in / out of the upcoming ES

Table 1: Traffic and movement – likely significant effects

Element	Phase	Scoped In / Out	Justification
Development Generated Construction Traffic	Construction	In	Construction traffic impacts of construction works will be assessed as part of the ES.

AILs Delivery Strategy	Construction	In	The ES will confirm the worst-case number of abnormal and modular loads required and the types of vehicles / vessels required. Any mitigation measures required to facilitate the delivery of abnormal/modular loads will be detailed in the ES and any resultant likely significant effects assessed.
Development Generated Operation Traffic	Operation	Out	The operational traffic impacts of Site operation works are not expected to change by more than 10% when compared to the sites existing use and therefore, in line with IEMA Guidelines (Ref 284) can be scoped out. This will be evidenced in the TA as part of the application.
Development Generated Decommissioning Traffic	Decommissioning	Out	The traffic impacts of Site decommissioning works are uncertain at this stage, and it is considered that the likely significant effects would be no worse than the Construction Phase. A DEMP would be prepared at the time of decommissioning.

6.9 Considering the scale and land use of the proposed development, JSJV would suggest that the approach to scope in AILs and construction traffic, while scoping out operational and decommissioning traffic is appropriate.

7 Assessment Methodology

7.1 JSJV would agree with the approach that the assessment methodology to be used to determine the potential Traffic and Movement effects of the proposed development within the study area to follow IEMA guidelines, as set out in *'Environmental Assessment of Traffic and Movement'* (2023).

7.2 We would expect the upcoming Construction Worker Travel Plan to be prepared in accordance with Planning Practice Guidance on preparing Travel Plans.