



Planning Inspectorate

## Lighthouse Green Fuels Project

### Section 51 Advice Log Version: 05 March 2026

There is a statutory duty under ['section 51 \(s51\) of the Planning Act 2008'](#) for The Planning Inspectorate to record the advice that it gives in relation to an application or potential application, and to make this publicly available.

This document comprises a record of the advice that has been provided by The Planning Inspectorate to the applicant (LGF Projects Limited) and their consultants during the pre-application stage. It will be updated by The Planning Inspectorate after every interaction with the applicant during which s51 has been provided. The applicant will always be given the opportunity to comment on The Planning Inspectorate's draft record of advice before it is published.

The applicant will use this advice log as the basis for demonstrating regard to s51 advice within the application.

## Project name- s51 Advice Log - Index

Date of meeting	Meeting overview
<a href="#">15 September 2025</a>	<p>Inception Meeting:</p> <ul style="list-style-type: none"><li>• <b>Welcome and introductions</b></li><li>• <b>The Proposed Development</b></li><li>• <b>The pre-application service offer</b></li><li>• <b>Practical Arrangements</b></li><li>• <b>Next Steps</b></li><li>• <b>Any other business</b></li></ul> <p>A meeting note is available for this meeting on the Find a National Infrastructure Project Website. View meeting <a href="#">note</a> (PDF, 171KB).</p>
<a href="#">04 November 2025</a>	<ul style="list-style-type: none"><li>• Pre-application prospectus</li></ul>
<a href="#">13 November 2025</a>	<ul style="list-style-type: none"><li>• Programme document feedback</li></ul>
<a href="#">09 December 2025</a>	<p>Project update meeting:</p> <ul style="list-style-type: none"><li>• Draft document review</li><li>• Draft development consent order</li><li>• Compliance with regulation 6 of the APFP regs</li><li>• Consultation Events</li><li>• Revised Programme Document</li><li>• Next Meeting</li></ul>

<b>Project name - s51 Advice Library</b>	
<b>Topic</b>	<b>Meeting date: 15 September 2025</b>
Inception Meeting note	A meeting note is available for this meeting on the Find a National Infrastructure Project website. <a href="#">15 September 2025</a>
Section 51	The Inspectorate advised that a note of the meeting would be taken and published on its website in accordance with section 51 of the Planning Act 2008. It was confirmed that any advice given under section 51 does not constitute legal advice upon which applicants (or others) can rely.
Environmental constraints and issues.	The Planning Inspectorate advised the applicant to engage with the Health and Safety Executive (HSE) at the earliest opportunity to support regulatory compliance and facilitate an efficient development process.
Consultation	The Planning Inspectorate advised that consultation materials must clearly distinguish between the current project and the previous scheme to avoid confusion and ensure clarity for stakeholders.
<b>Topic</b>	<b>Advice (email): 04 November 2025</b>
Pre-application prospectus	The Inspectorate has advised that, following a 6-month review of our services, our Pre-application Prospectus has been updated: 2024 <a href="#">Pre-application Prospectus</a> . The update log at the bottom of the page summarises the changes and clarifications that have been applied.

	<p>Applicants with a live project at the pre-application stage of the process, please familiarise yourself with the update and consider how it might affect your pre-application programme and interaction with our services. Please note in particular:</p> <ul style="list-style-type: none"> <li>• the establishment of land and rights negotiations tracking as a primary service feature – this means it is now expected for all applicants to develop and share a land and right negotiations tracker in 1 of 2 available templates, irrespective of the service tier they have subscribed to</li> <li>• clarified expectations of applicants when preparing to interact with the Inspectorate at meetings – including clarified rights for the Inspectorate to delay or refuse service where pre-meeting expectations are not upheld e.g. an updated programme document or 9 issues tracker is not provided, on time, to inform a meeting agenda.</li> </ul>
--	---

Topic	Advice (email): 13 November 2025
<p>Programme document feedback</p>	<p><b>S51 advice regarding the Applicant’s first submitted Programme Document</b></p> <p>The applicant supplied the Inspectorate with its initial Programme Document as specified in the 2025 Pre-application Prospectus. Having reviewed the document, the Inspectorate considers that the Programme Document should cover some additional content, as set out in the government’s pre-application guidance.</p> <p>The Inspectorate has recently published a Programme Document template which the applicant is now advised to refer to for future iterations. The template and accompanying information is set out in the <a href="#">Pre-application Prospectus</a>.</p> <p>In the next iteration, the applicant is advised to include the following:</p> <p><b>Background to the project:</b></p> <ul style="list-style-type: none"> <li>• a brief explanation of the Planning Act 2008 process and why the applicant is required to apply for development consent through this process, or signposting to this information on the applicant’s website</li> <li>• brief details of any licenses or non-planning consents required which are not included in the draft development consent order, or signposting to this information on the applicant’s website</li> <li>• a brief summary of the policy context for the application, or signposting to this information on the applicant’s website</li> </ul>

### **The Planning Inspectorate's pre-application service**

- a statement reflecting the pre-application tier service that the applicant has subscribed to, with justification as required, signposting as appropriate to the Planning Inspectorate's [Pre-application Prospectus](#)
- where applicable, a statement identifying which supplementary components listed in the annex to the Pre-application Prospectus the applicant intends to develop

### **The pre-application programme**

- further detail regarding the programme of activities to support the intended design approach
- further detail regarding the programme of activities relating to the development of key application documents, including the draft development consent order
- details of all interactions requested between the applicant and the Planning Inspectorate including proposed timescales for future project update meetings and, where applicable, multiparty meetings. The Inspectorate notes that the applicant has indicated that may not request the Inspectorate's draft documents review service. Should this change it would be helpful to have the timescales for this provided and brought to the Inspectorate's attention at the earliest opportunity.
- details of all planned future interactions between the applicant and relevant statutory bodies, including local authorities, outside of the statutory consultation any intended financial support agreements, such as Planning Performance Agreements (PPAs)

### **Main issues for resolution**

- a statement that the applicant will be producing a 'potential main issues for examination' document for submission with the application

### **Engaging with statutory bodies**

- a summary of how the applicant is engaging with statutory bodies, including details of any recurring meetings and/ or working groups, outside of the statutory consultation
- a statement reflecting which statutory bodies the applicant expects will produce pre-application 'principal areas of disagreement summary statements'

### **Engaging with local authorities**

- the Inspectorate notes that the programme document refers to two host authorities, but there is no explicit reference to

	<p>any neighbouring authorities. It would therefore be helpful to have a list of the main local authorities affected by the application and a summary of how the applicant is engaging with, them including details of any recurring meetings and/ or working groups, outside of the statutory consultation.</p> <ul style="list-style-type: none"> <li>• a statement reflecting whether the applicant will enter into a planning performance agreement with any affected local authorities</li> </ul> <p><b>Pre-application risks</b></p> <ul style="list-style-type: none"> <li>• the Inspectorate notes the risks and issues listed, and advises that it would be helpful to have further detail regarding the ongoing monitoring and tracking of these including the degree to which the applicant expects specific issues raised by local authorities and statutory bodies to be resolved before the application is submitted</li> <li>• a statement of which local authorities and statutory bodies the risks and issues tracker is being shared with.</li> </ul> <p>The applicant is advised to give consideration to whether the programme contains sufficient time to include a targeted consultation, should this be required.</p> <p>This is of particular importance considering there is no non-statutory consultation in the current programme. The applicant should also consider whether there is sufficient time between the scoping opinion and statutory consultation that enough detail will be made available for consultation.</p> <p>With regards to the Adequacy of Consultation Milestone document, the Inspectorate advises that it is important that it includes the views of all relevant local authorities (host and neighbouring, as applicable) and should be submitted to the Inspectorate three months prior to submission.</p> <p>In general, the applicant is advised of the requirement to demonstrate regard to advice given. The applicant is also advised of the requirement to host and maintain the Programme Document on their project website.</p>
--	---

<b>Topic</b>	<b>Project Update Meeting: 09 December 2025</b>
Draft Document Review	<p>The Inspectorate (PINS) noted that the Programme Document does not include a review of draft documents.</p> <p><b>Advice</b></p>

	<p>The Inspectorate advised that if the applicant decides to submit any draft documents for the Inspectorate review, then it is strongly recommended that this is communicated to the Inspectorate as early as possible. Early notification will allow sufficient time for scheduling and feedback, which can help avoid delays later in the process.</p>
<p>Draft Development Consent Order (dDCO)</p>	<p>The Inspectorate emphasised the importance of clearly distinguishing between primary development and associated development within the draft DCO. This distinction is critical for transparency and for ensuring that the Examining Authority can properly assess the scope of the application. It would be helpful to clarify how the other elements of the proposal will be described in the draft DCO.</p> <p><b>Advice</b></p> <p>The Inspectorate advised that the applicant should ensure that the draft DCO explicitly identifies the primary development being applied for, rather than presenting associated development as the main focus.</p> <p>Failure to make this distinction clear can lead to confusion during examination and may result in requests for clarification or additional documentation.</p> <p>To assist with this, the Inspectorate advised that the applicant may wish to review similar projects where this issue has been addressed effectively, such as:</p> <ul style="list-style-type: none"> <li>• <b>Palm Paper</b></li> <li>• <b>Hinckley Rail Freight Interchange</b></li> </ul> <p>These projects included generating stations as part of their applications and provide useful examples of how to structure and present primary versus associated development.</p>
<p>Compliance with regulation 6 of the APFP regs</p>	<p>The Inspectorate reminded the applicant of the need to comply fully with Regulation 6 of the <b>Applications: Prescribed Forms and Procedures (APFP) Regulations</b>. This regulation sets out the documentation requirements for a valid application.</p> <p><b>Advice</b></p> <p>The Inspectorate advised that the applicant should review the relevant guidance and ensure that all required documents are complete, accurate, and submitted in the correct format.</p> <p>In particular, the Inspectorate recommends examining the approach taken by the Hinckley Rail Freight Interchange project, which provided a comprehensive Grid Statement.</p> <p>This example demonstrates best practice in meeting regulatory requirements and may serve as a useful reference for preparing their own documentation.</p>

<p>Consultation Events</p>	<p>The Inspectorate advised that it may be helpful to have an in-person consultation event in January 2026. This advice is based on the proximity of other planned events to the Christmas period, which may limit stakeholder availability and engagement.</p>
<p>Revised Programme Document</p>	<p>Just before the meeting the applicant shared a revised Programme Document for Inspectorate review.</p> <p><b>Advice</b></p> <p>The Inspectorate advised that it would be helpful to include detail of any planned future interactions/meetings with statutory bodies including LPAs, and any neighbouring authorities.</p> <p>It would be helpful to clarify how the other elements of the proposal will be described in the draft DCO.</p> <p>The revised PD does not plan for the applicant to use the Inspectorate’s draft documents review service. As advised above. It would be helpful to have the timescales for this provided and brought to the Inspectorate’s attention at the earliest opportunity.</p>
<p>Next Meeting (Feb 2026 date to be confirmed)</p>	<p>The Inspectorate requested that the Applicant set out the key issues and risks for the project ahead of the next meeting. This will enable the Inspectorate to undertake background research on similar issues encountered in other projects and provide informed advice.</p> <p><b>Advice</b></p> <p>Please prepare and share a summary of the key issues and risks in good time before the next meeting. This proactive approach will support a smoother acceptance and examination process by allowing the Inspectorate to identify potential challenges early and suggest strategies for addressing them.</p>
<p><b>Lighthouse Green Fuels - s51 Advice Library</b></p>	
<p><b>Topic</b></p>	<p><b>Meeting date: 05 March 2026</b></p>
<p>Issues Tracker</p>	<p>The Inspectorate noted its concerns that several issues are predicted to remain unresolved at submission.</p> <p><b>Advice</b></p> <p>PINS advised progressing these as far as possible now, as unresolved matters become much harder and more time consuming to address during examination.</p> <p>The Inspectorate advised that lack of agreement on key</p>

	<p>methodologies particularly environmental assessment could create challenges in examination. The applicant should aim to secure agreement or clearly set out where positions differ.</p> <p><b>Post-meeting note:</b> The Inspectorate highlights paragraph 5.4.27 of NPS EN-1 and the expectations on applicants to include with their application such information as may reasonably be required to assess a potential derogation under the Habitats Regulations, should Natural England indicate in pre-application that the proposed development is likely to adversely impact the integrity of habitat sites.</p>
<p>Consultation</p>	<p><b>Advice</b></p> <p>The Inspectorate advised the applicant that they should ensure the Consultation Report clearly describes the consultation carried out, including the planned targeted consultation. The Consultation Report should also include summaries of responses received and should demonstrate how the project has had regard to those responses including any changes to the scheme (or if none, why not).</p>
<p>Draft document review</p>	<p>The Inspectorate noted that the applicant's current Programme Document does not programme time for the Inspectorate review of any draft documents.</p> <p><b>Advice</b></p> <p>The Inspectorate advised the applicant they may wish to use the Inspectorate's draft document review service, particularly if any of the documents include any novel drafting.</p> <p>The following draft application documents can be reviewed within the standard tier service:</p> <ul style="list-style-type: none"> <li>• draft DCO, including protective provisions and/ or draft deemed marine licence(s)</li> <li>• draft DCO explanatory memorandum</li> <li>• draft sample works plans and land plans</li> <li>• draft consultation report including section 42 consultee list</li> <li>• draft HRA report</li> </ul> <p>The Inspectorate allows 6 weeks to review the documents and provide feedback. This could be shorter or longer depending how complex and novel the project or the issues it raises might be, subject to our agreement.</p> <p>The Inspectorate advised that the applicant is expected to share relevant draft application documents with key stakeholders, enabling those stakeholders to provide a response, outlining any areas of concern or disagreement.</p>

	<p>The Inspectorate also advised the applicant to share draft environmental statement chapters with statutory bodies, local authorities and other relevant stakeholders where they are aware that they may have substantial interests that may need addressing.</p>
--	---