

Lighthouse Green Fuels Project

Section 51 Advice Log Version: 27 August 2026

This document comprises a record of the s51 advice that has been given by the Planning Inspectorate to the applicant LGF Projects Limited during the pre-application stage. It will be updated by the Planning Inspectorate after every interaction with the applicant within which s51 advice has been given.

The applicant will always be given the opportunity to comment on the Planning Inspectorate's draft record of the s51 advice given before it is published on the relevant project page on the [Find a National Infrastructure Project website](#).

The role of the advice log at the acceptance stage

Section 55(4) of the PA2008 requires the Planning Inspectorate to consider, amongst other things, the extent to which the applicant has had regard to the s51 advice given by the Planning Inspectorate in connection with the application when deciding if the application can be accepted for examination. Section 51 advice includes:

- advice given about applying for an order granting development consent
- advice given about making representations about an application for an order granting development consent

The applicant will use this advice log as the tool for demonstrating:

- regard to the s51 advice given to the applicant by the Planning Inspectorate
- regard to any s51 advice given to others by the Planning Inspectorate

The applicant will submit a final version of this advice log which demonstrates regard to all s51 given by the Planning Inspectorate at the pre-application stage as part of the application.

Lighthouse Green Fuels– Applicant meeting index

Date of meeting	Meeting overview
15 September 2025	Inception Meeting: • Welcome and introductions • The Proposed Development • The pre-application service offer • Practical Arrangements • Next Steps • Any other business A meeting note is available for this meeting on the Find a National Infrastructure Project Website. View meeting note (PDF, 171KB).
04 November 2025	Pre-application prospectus
13 November 2025	Programme document feedback
09 December 2025	Project update meeting: • Draft document review • Draft development consent order • Compliance with regulation 6 of the APFP regs • Consultation Events • Revised Programme Document Next Meeting
05 March 2026	• Project Update Meeting • • Issues tracker • Consultation • Draft document review Next meeting
1 July 2026	Draft document advice review table
29 July 2026	Project Update Meeting

	• Section 51 Advice on draft document review and issues tracker • Government Guidance
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Lighthouse Green Fuels– Log of s51 given to the applicant

Meeting date: 15 September 2025

Topic	s51 advice given	Applicant regard to s51 advice given
Inception Meeting note	A meeting note is available for this meeting on the Find a National Infrastructure Project website. 15 September 2025	
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.	
Meeting date: 04 November 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
Pre-application prospectus	The Inspectorate has advised that, following a 6-month review of our services, our Pre-application Prospectus has been updated: 2024 Pre-application Prospectus. The update log at the bottom of the page summarises the changes and clarifications that have been applied. 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: • 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 • 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.	
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Meeting date: 13 November 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
Programme document feedback	S51 advice regarding the Applicant's first submitted Programme Document 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. 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 Pre-application Prospectus. In the next iteration, the applicant is advised to include the following: Background to the project: • 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 • 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 • a brief summary of the policy context for the application, or signposting to this information on the applicant's website The Planning Inspectorate's pre-application service	
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	• 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	
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	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	
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	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 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. - a statement reflecting whether the applicant will enter into a planning performance agreement with any affected local authorities Pre-application risks - 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	
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	to be resolved before the application is submitted • a statement of which local authorities and statutory bodies the risks and issues tracker is being shared with. The applicant is advised to give consideration to whether the programme contains sufficient time to include a targeted consultation, should this be required. 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. 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. 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.	
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Meeting date: 09 December 2025		
Topic	s51 advice given	Applicant regard to s51 advice given
Draft Document Review	The Inspectorate (PINS) noted that the Programme Document does not include a review of draft documents. Advice 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.	
Draft Development Consent Order (dDCO)	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. Advice 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. Failure to make this distinction clear can lead to confusion during examination and may result in requests for clarification or additional documentation. 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: • Palm Paper • Hinckley Rail Freight Interchange These projects included generating stations as part of their applications and provide useful examples of how to structure and present primary versus associated development.	
Compliance with regulation 6 of the APFP regs	The Inspectorate reminded the applicant of the need to comply fully with Regulation 6 of the Applications: Prescribed Forms and Procedures (APFP) Regulations. This	

	regulation sets out the documentation requirements for a valid application. Advice 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. In particular, the Inspectorate recommends examining the approach taken by the Hinckley Rail Freight Interchange project, which provided a comprehensive Grid Statement. This example demonstrates best practice in meeting regulatory requirements and may serve as a useful reference for preparing their own documentation.	
Consultation Events	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.	
Revised Programme Document	Just before the meeting the applicant shared a revised Programme Document for Inspectorate review.	

	Advice 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. It would be helpful to clarify how the other elements of the proposal will be described in the draft DCO. 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.	
Next Meeting (Feb 2026 date to be confirmed)	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. Advice 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.	
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Meeting date: 05 March 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
Issues Tracker	The Inspectorate noted its concerns that several issues are predicted to remain unresolved at submission. Advice PINS advised progressing these as far as possible now, as unresolved matters become much harder and more time consuming to address during examination. The Inspectorate advised that lack of agreement on key methodologies particularly environmental assessment could create challenges in examination. The applicant should aim to secure agreement or clearly set out where positions differ.	

	Post-meeting note: 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.	
Consultation	Advice 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).	
Draft document review	The Inspectorate noted that the applicant's current Programme Document does not programme time for the Inspectorate review of any draft documents. Advice	

	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. The following draft application documents can be reviewed within the standard tier service: • draft DCO, including protective provisions and/ or draft deemed marine licence(s) • draft DCO explanatory memorandum • draft sample works plans and land plans • draft consultation report including section 42 consultee list • draft HRA report 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. 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.	
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	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.	
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Meeting date: 29 July 2026		
Topic	s51 advice given	Applicant regard to s51 advice given
Section 51 Advice	The applicant asked how the Planning Inspectorate intends to assess applicants' regard to s51 advice given to 'others' (in view of s55(4)(e) of the Planning Act 2008), and whether the Ministry of Housing, Communities and Local Government (MHCLG) and/ or the Inspectorate plans to broaden the guidance on this matter. The Inspectorate advised that a pragmatic and proportionate approach can likely be taken by applicants on a case-by-case basis, when deciding the extent of regard that needs to be demonstrated to any s51 advice given to others. This will likely depend on the relevance of the advice given to the context of the project and matters that are likely to be material to the acceptance	

	and examination stages. This is in view of the wording given at paragraphs 7.7 to 7.11 of the government's 'Planning Act 2008: Guidance on preparing an application: Part 1 - Pre-application steps', and paragraphs 2.3 and 2.4 of the 'Planning Act 2008: Guidance on the acceptance stage of an application'. Paragraph 3.9 of the guidance on acceptance establishes a connection between s51 advice and the satisfactory standard, where applicants should "give reasoning" when diverging from any section 51 advice given. In most cases, the Inspectorate advised that advice to members of the public to date has been more generic about how to participate in the DCO process, rather than being project specific. However, pertinent project specific advice could be given to statutory parties, members of the public and other stakeholders through the Inspectorate chairing multi-party meetings in addition to the usual means of answering requests for advice in connection with an application, depending on the relevance and substance of the matters raised. The Inspectorate said that it was alert to the use of AI in representations and the potential for it to generate voluminous and wide-ranging content. The Inspectorate seeks to ensure the responsible use of AI	
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	(through its published policy on the 'Use of artificial intelligence in casework evidence') and will seek to address any obvious unreasonable behaviour. Any advice given is published on the Inspectorate's 'record of advice' on its website, in accordance with s51 of the Planning Act 2008 and Regulation 11 of the APFP Regulations. Applicants can view this advice using the search function, with any project-specific advice linked to the relevant website project page. The Inspectorate will consider whether any particular advice given to 'others' during pre-application should be captured and linked in its Advice Log, to assist applicants in demonstrating and recording its regard to such advice, as part of its review of its pre-application services.	
Government Guidance	The Inspectorate agreed to signpost to any relevant, emerging information or advice given to other applicants about the new acceptance tests (for those applications being submitted to the Inspectorate before the application for Lighthouse Fuels is made). The applicant was pointed to the Inspectorate new s55 checklist, which has been amended to take account of the changes to legislation under the Planning and Infrastructure Act 2025 (coming into	

	force from 24 July 2026). The s55 checklist is published as part of its 'Advice on the Preparation and Submission of Application Documents'. Other advice pages are also in the process of being updated.	
Consultation Report	The applicant asked what form the Consultation Report should take, where consultation has been carried out under the previous legislative requirements and where such reports have already progressed to an advanced degree. The applicant said it may choose to scale-down the section in regard to consultation feedback, owing to the removal of the adequacy of consultation test. The Inspectorate stated there is no prescribed form and referred to paragraph 8.5 of the 'Planning Act 2008: Guidance on preparing an application: Part 1 - Pre-application steps', which states that there is "no statutory requirement to produce a consultation report". Applicants can therefore decide whether to submit a short engagement summary with its DCO application, "if they consider this adds value". Paragraph 2.4 of the 'Planning Act 2008: Guidance on the acceptance stage of an application' makes clear that the "degree to which the applicant has chosen to carry out pre-application engagement and	

	consultation, and the applicant's approach to this, is not a statutory consideration in determining whether an application should be accepted in accordance with section 55 of the Planning Act". The adequacy of any engagement or consultation "is also not a consideration in the assessment of a DCO application". Consequently, applicants can therefore decide what form any such engagement summary may take, and the extent of content an applicant deems to be necessary.	
Initial Assessment of Principal Issues (IAP)	In answer to questions from the applicant, the Inspectorate explained that Examining Authorities have already been working towards preparing more concise and tailored IAPs identifying the principal issues arising from the application that require examination (as required by s88(1) of the Planning Act 2008), before the publication of the government's latest 'Planning Act 2008: Guidance on the pre-examination stage of an application' (3 July 2026 version, paras 4.6 to 4.13). Examples include the IAPs published for the examination of applications for 'A66' and 'Keadby'. In June 2025, the Inspectorate also revised its template for the Rule 6 notice, as shown in the Rule 6 letters issued	

	for 'Peartree Hill Solar' and 'Dean Moor Solar', where new standard text (in annex c) was added to help explain to parties that the IAPI is not intended to be a comprehensive or exclusive list of the issues that may be subject to examination, and that matters in relation to national policy, compulsory acquisition, human rights and equality duties, will be an integral part of the examination (without needing to be stipulated or repeated in the IAPI).	
Pre-examination stage	The Inspectorate confirmed the government's expectation that the pre-examination stage should be kept as short as possible for most applications, generally lasting no more than four months (see para 2.1 of the 'Planning Act 2008: Guidance on the pre-examination stage of an application'). The Inspectorate said that applicants will therefore need to ensure that the relevant representations period can open as early as possible during pre-examination and to have suitable venues ready for the Preliminary Meeting and initial examination hearings. The Inspectorate added that the executive agency had already made preparations for ensuring efficient and proportionate examinations, citing the four and a half	

	month examination of the 'Frodsham Solar Project' application as an example.	
Issues Tracker	The Inspectorate said it is advising all applicants to set out the likely main issues arising from their proposed developments clearly in their 'Issues Trackers' and at an early stage during pre-application, to enable constructive dialogue and allow the Inspectorate to focus its s51 advice on the main principal issues and risks. Applicants should be open and transparent about the information made available at pre-application, identifying key issues early and the progress made to address these before submission of the DCO application (see paragraphs 3.4 and 3.8 of the 'Planning Act 2008: Guidance on preparing an application: Part 1 - Pre-application steps'). Applicants should clearly record the progress made in reaching agreements with statutory parties (and others) on the methodology to be used and the extent of surveys, assessments and mitigation measures needed to address any significant effects on designated sites, heritage assets, protected species and other sensitive receptors arising from proposed development, as well as where reliance is being made on any precedents and conventions in other made DCOs (while justifying any departures).	

	Advice on the applicant's Issues Tracker has been issued separately.	
Publication of application documents	The Inspectorate advised that there is a government expectation that applicants are also encouraged to publish application documents on their own project webpage either before or at the same time as submission of the application to the Planning Inspectorate. These earlier informal publication arrangements allow more time for those who wish to become familiar with the detail of what is being proposed ahead of the opening of the relevant representation period. Also applicants are encourage to give permission to the Inspectorate to publish application documents on its Find a National Infrastructure Project website after submission and before an acceptance decision is made. Please refer to paras 3.12 to 3.15 of the Planning Act 2008: Guidance on the acceptance stage of an application - GOV.UK	

Planning Inspectorate Section 51 advice regarding draft application documents - Issued on 1 July 2026

Overarching comments		
Ref No.	Page/ Plot Ref	Comment or question
1.	N/A	The Inspectorate notes that owing to the unfinished state of the draft documents provided by the applicant for our review, this has meant that the checks undertaken and advice we have provided has been limited and we have been unable to cross check a number of documents.
2.	Habitat Regulations Assessment	The applicant stated that it has not submitted the Draft Report to inform the Habitat Regulations Assessment because the supporting ecology assessment has not been completed and therefore the contents of the document is incomplete to the extent that the applicant does not consider it helpful for PINS to review. In the absence of a HRA report to review, the applicant should provide an overview of the information to inform the HRA at the next project update meeting. It would be helpful to provide an overview of the sites, features, pathways, progress in drafting, conclusions, consultation with Natural England and the Marine Management Organisation and the degree to which both parties agree with the conclusions.

Draft development consent order (DCO)		
Ref No.	Article/ Schedule/ Requirement	Comment or question
1.	N/A	<i>'Laid before parliament'</i> not required under Development Consent Order title
2.	N/A	Page numbers not normally required/ provided

Draft development consent order (DCO)		
Ref No.	Article/ Schedule/ Requirement	Comment or question
3.	List of Schedules, cross references	Not all Schedules have been provided, including but not limited to protective provisions and documents to be certified. At the next Project Update Meeting with the Inspectorate, the applicant should provide an update on the status of protective provisions and to what extent these have been agreed with the relevant statutory undertakers, denoting any bespoke provisions being drafted.
4.	Definitions	'Wider site' is not in definitions, please include.
5.	Preamble	It is customary for subsections of the Planning Act 2008 to be referenced here, for example sections 114(e), 115(f) etc.
6.	Part 1 Preliminary 2.	Spelling error. 'Highwars Act', should read 'Highways Act'.
7.	Part 4 Interpretation	Issue with paragraph number (30).
8.	Part 2 Conditions Design Parameters	Table 7 as referenced at section 9 is not provided. It is assumed that this is due to a number of Schedules not provided. Clear design parameters must be provided for all forms of development, as appropriate.
9.	Article 38	Typo. Should read 'Saving for Trinity House.'
10.	Schedule 1 Part 1 Authorised development	Parameters not included here, for example bore diameter and size of pipelines. Parameters should be included, as per the Environmental Statement. See also previous comment above.

Draft development consent order (DCO)		
Ref No.	Article/ Schedule/ Requirement	Comment or question
11.	Schedule 1 Part 2 Associated Development	Given that Schedule 1 Part 1 Authorised Development currently includes works which could comprise aspects that require development consent and associated development, this Schedule should be renamed 'Further Associated Development' to avoid any confusion.
12.	Use of language	Use of the word 'may', such as 'may include' should be reviewed and its use is discouraged, to avoid ambiguity.
13.	Part 4 Interpretation R28 (a)	Reference to 'land plan' rather than 'land plans' as per the definitions - please ensure consistency of terms throughout the dDCO.
14.	Part 4 Supplemental Powers R15	Please explain any implications of s146 of PA2008 on this provision.
15.	Deposit location	Please provide details of deposit location (document inspection address). Should the address relate to a third party, provide evidence to show that the party has agreed to this.

Draft DCO explanatory memorandum		
Ref No.	Paragraph	Comment or question
1.	General	Should the applicant take the approach in Schedule 1 of the dDCO as per its covering letter dated 27 May 2026, it should provide a clear explanation in the dEM regarding which aspects of the works in Schedule 1, Part 1, Authorised Development require development consent, and which aspects are associated development.

Draft DCO explanatory memorandum		
Ref No.	Paragraph	Comment or question
		For example, at present, works such as ' <i>Work No. 14 — access and private street improvements, including works to create, improve, repair, or maintain access roads and access points</i> ' may comprise associated development, rather than works that require development consent. This needs to be clearly outlined within the dEM. The applicant is advised to refer to the Planning Inspectorate's Advice Note Fifteen for further guidance.
2.	5.3.2	No explanatory text provided in relation to Article 4.
3.	5.6.2 Article 18	Limited justification provided in support of a seven year commencement time limit. Please expand upon the text provided.
4.	Permits and Licences	Need to include permits or licences that have been obtained outside of the dDCO, as relevant.
5.	Use of language	Use of the word 'may', such as 'may include' should be reviewed and its use is discouraged, to avoid ambiguity.

Draft sample works plans and land plans		
Ref No.	Plan Name and Ref	Comment or question
1.	Land Plans	A full plan check has not been possible as only 6 sheets of plans have been provided.
2.	Land Plans	Plot numbers not labelled as per the standard (e.g. 01-01 etc). The BoR only includes the written narrative and not plot numbers. A sense check was therefore not possible.

Draft sample works plans and land plans		
Ref No.	Plan Name and Ref	Comment or question
3.	Land Plans	Labels for all roads not provided – please provide as this will ensure ease in doing the cross checks with the Book of Reference.
4.	Works Plans	Due to the nature of the site, it could be confusing to have the OS map under the works plans in its current form as it appears to show buildings underneath, which could be confused for the proposed layout or misrepresent the current state of the site. It would be beneficial for the applicant to alter the grayscale so that the OS mapping is not as prominent, or another appropriate solution to clarify this matter.

Draft environmental statement (ES) project description chapter(s)		
Ref No.	Paragraph/ Section	Comment or question
1.	4.1.1.6	This paragraph refers to the former Lighthouse Green Fuels site, but when this chapter is read in isolation there is no context for a new reader to ascertain where the former site is, or its history. The applicant is advised to provide some more context within this chapter or signpost to where the evolution of the proposed development and location of the former site is explained elsewhere in the ES.
2.	4.2.1.1	Work No. 13 “temporary construction compounds and laydown areas (Work No. 13A)” is bulleted twice – remove duplicate.
3.	Table 4.1	For the feedstock pre-treatment (Work No 1A) and Combined Heat and Power (CHP) plant (Work No 2) design parameters are provided for buildings and stacks. The SAF Production – Main Gasification Unit (Work No 1B) includes a single figure (75 mAGL). Paragraphs 4.2.1.1 (Work No 1B) and 4.3.3.3 indicate that the SAF production process also requires a stack. The applicant should clarify the total number of stacks required to operate the proposed development and provide maximum design parameters for these.

Draft environmental statement (ES) project description chapter(s)		
Ref No.	Paragraph/ Section	Comment or question
4.	4.3.1	The ES states that the SAF production facility will utilise sustainably sourced biomass that meets the sustainability criteria specified within the SAF Mandate. However, further information is welcomed regarding the nature and origin of this feedstock. The ES should provide further details on: • the specific composition and types of biomass/feedstocks that will be used (e.g. forestry residues, agricultural residues, waste wood, municipal waste, used cooking oils, etc.) • the physical form in which the feedstocks will be received, stored and processed (e.g. chips, pellets, slurry etc.) • the anticipated quantities of feedstock required annually • the likely geographic source of the feedstocks, including whether they will be sourced locally, nationally or internationally • evidence demonstrating how the sustainability requirements of the SAF Mandate will be achieved and maintained throughout the operational life of the facility
5.	4.3.3.7	The ES states that in the future, CO₂ from the CHP plant and thermal pre-treatment of feedstock may be sent to a Post-combustion Carbon Capture Unit (PCCU) and directed to the Northern Endurance Partnership for transport and permanent storage, but the PCCU does not form part of the proposed development. Would the development of the PCCU require land beyond the current order limits? If carbon capture is the applicant's preferred decarbonisation readiness route, the applicant should demonstrate that sufficient space is available on or near the site to accommodate carbon capture equipment. This should be clarified within the suite of application documents.
6.	Inset 4.2	We consider this diagram could be improved to further clarify the production process: • more detail should be added to the biomass and waste wood CHP and on feedstock pre-treatment, including inputs and outputs such as waste residues and emissions

Draft environmental statement (ES) project description chapter(s)		
Ref No.	Paragraph/ Section	Comment or question
		• clarification should be provided on SAF processing, including inputs and outputs at different stages • utility systems, flares, waste water and the air separation unit are listed but have not been incorporated into the process diagram. Taking an input – output approach would contextualise these elements of the development within the production process.
7.	4.3.5.1	Paragraph 4.3.5.1 states that the CHP will be fuelled by either biomass or waste wood or a blend of the two. We advise that the ES clarify any differences between the CHP feedstock and the SAF production feedstock. Clarify whether the sourcing of the CHP biomass will need to meet the sustainability criteria specified in the SAF Mandate (and be independently certified and audited).
8.	4.4.8.1	Operational vehicle numbers – the scoping opinion stated that “the ES should include an assessment of these matters, or the information referred to demonstrating agreement with the relevant consultation bodies and the absence of a likely significant effect.” Evidence (or signposting to evidence elsewhere in the ES) should be provided to demonstrate absence of a likely significant effect.
9.	4.3.3.10 and 4.7.2	The ES states that routine maintenance periods are scheduled every 36 months, with shut-down required in the event of periodic maintenance, statutory inspection, or an emergency. Further information is requested regarding the nature and duration of these maintenance shutdowns. The ES should provide further details on: • the anticipated duration of each routine maintenance shutdown • the types of maintenance, inspection, repair, replacement, or refurbishment activities that will be undertaken during these periods • any plant equipment or process units that will be taken offline • whether any abnormal operations, such as plant depressurisation, cleaning, flaring, venting, waste removal, or increased vehicle movements, will occur before, during, or after the shutdown period

Draft environmental statement (ES) project description chapter(s)		
Ref No.	Paragraph/ Section	Comment or question
		any potential environmental effects associated with maintenance activities, including emissions to air, noise, traffic, waste generation, and lighting.

Draft book of reference (BoR)		
Ref No.	Page/ Plot Ref	Comment or question
1.	General	Could not cross check land plans and plot numbers as the document is incomplete.
2.	2.2.10	Reference made to 'plots shaded yellow' on Land Plans, to relate to the temporary use of land, where Temporary Possession is proposed. As not all sheets have been provided, this category is not currently shown on the plans provided. The inspectorate assume that this matter will be resolved upon receipt of all sheets.
3.	General	Crown land has been identified in the BoR, however no separate Crown Land plans have been provided.
4.	Works No. 9	Description in BoR does not match works plan. In the BoR <i>"Modified or new natural gas connection and above ground infrastructure"</i> . Whereas, in the works plans <i>"Natural Gas Connection Works"</i>

Advice in response to questions in the applicant's cover letter

Ref No.	Page/ Ref	Comment or question
1.	Applicant's cover letter (page 2)	In response to the three points raised on Page 2 of the applicant's covering letter dated 27 May 2026, the Inspectorate advises the following: 1. Schedule 1 of the dDCO - the Inspectorate finds that the document is sufficiently clear, save for the need to provide an explanation in the dEM regarding which works require development consent and which are considered to be associated development, as Schedule 1 Part 1 currently includes works that could be either (please see feedback table - dEM for a more detailed explanation of this). 2. Definitions 'main site' and 'wider site' The Inspectorate sees no issue with the definitions 'main site' and 'wider site' in principle, providing that reference to these are consistent across the dDCO, ES and other documents.

Detailed Land and Rights and Negotiations Tracker

Ref No.	Page/ Ref	Comment or question
1.	N/A	It would be helpful to utilise colour-coding to show the stage of discussions, particularly whether Heads of Terms are agreed, which will allow the Examining Authority to identify outstanding issues quickly (should the application be accepted for examination). The Inspectorate suggests Keadby Next Generation Power Station Project as an example which clearly sets out positions.

Issues Tracker		
Ref No.	Paragraph / Section	Comment or question
1.	General	The Inspectorate notes that the applicant has had regard to its '2024 Pre-application Prospectus' in producing the issues tracker, has used the recommended template and formatting for setting out the main issues arising from the proposed development and has applied the recommended red / amber / green (RAG) rating according to the degree of risk associated with each issue. The issues tracker is expected to form the basis of the applicant's main issues for examination document at acceptance. The production of this tracker at this stage is therefore appreciated. However, the Planning Inspectorate has the following comments: • while the issues tracker can be a short document setting out high-level information, the applicant's list of topics appears to be particularly succinct and limited on detail in relation to the residual sub-elements that require agreement with relevant statutory consultees (or negotiation with other relevant parties) to ensure the application is suitably prepared for acceptance, is compliant with statutory requirements, and will be of a satisfactory standard to enable an examination • there is a lack of any detail on the extent to which assessment methodologies have been agreed with statutory consultees on a topic-by-topic basis, and the scope of surveys and assessments needed as well as the stage of completion of those assessments • the issues tracker should be demonstrating that most of work needed to address the main topics are at an advanced stage, having reached agreement with relevant statutory parties on its assessment approaches and baseline information, even if the assessment outputs may be subject to discussion at examination • the applicant is advised to reach agreement with relevant statutory parties on the extent of data and survey work needed before submitting the application, or provide robust

		reasons for taking a different approach, to facilitate an efficient examination and meet regulatory requirements • the issues tracker should, where relevant, reflect current examination practice and the standards in made Development Consent Orders for similar applications, when addressing the principle main issues or in undertaking satisfactory assessments • the issues tracker should provide information on whether mitigation measures have been agreed with the statutory parties, or the stage of discussions on these. These matters should be resolved before the submission of the application for 'acceptance'. While the applicant can determine the extent of issues it considers are relevant for discussion with the Inspectorate at pre-application under its tracker, it would be useful to understand whether any of the following issues are outstanding at this stage: • any risks in relation to meeting industry standards for this type of development (such as ASTM D7566) in the application and full drop-in compatibility with existing aircraft and airport infrastructure and how will this be demonstrated • any risks in the application meeting policy requirements such as the UK SAF Mandate, where facilities must demonstrate significant lifecycle Green House Gas reductions • any likely significant residual environmental effects identified that require resolution (or adverse effects that require compensation) such as assessments in relation to the Teesmouth and Cleveland Coast Special Protection Area (SPA), Ramsar Site, and Site of Special Scientific Interest (SSSI)) • any significant impacts on any particularly sensitive receptors or designated heritage sites / assets on or near the site that require bespoke mitigation and what precedents are being drawn upon in relation to the applicant's approaches • any significant issues remaining in relation to the assessment of potential cumulative and combined effects as a result of the proposed development with other developments • any outstanding discussions to be completed before acceptance with relevant statutory bodies, such as the Royal Society for the Protection of Birds (RSPB) in relation to
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Lighthouse Green Fuels - Log of s51 advice given to others		
Person s51 advice given to	s51 advice given	Applicant regard to s51 advice given