



Planning Inspectorate

Lighthouse Green Fuels - EN0110025

LGF Projects Limited

Section 51 advice regarding draft application documents

Issued on 1 July 2026

On 27 May 2026, LGF Projects Limited submitted the draft documents listed in the tables below for review by the Planning Inspectorate as part of its ['Pre-application Service'](#).

The advice recorded in the tables below relates solely to matters raised from the Planning Inspectorate's review of the draft application documents. The advice is limited by the maturity of the documentation provided by the applicant and the time available for consideration and is raised without prejudice to the acceptance decision, the decision about admission to the fast track procedure (where relevant) or the final decision about whether development consent should be granted.

The applicant has been given the opportunity to comment on the Planning Inspectorate's draft record of advice before it was published.

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
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.

Draft development consent order (DCO)

Ref No.	Article/ Schedule/ Requirement	Comment or question
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. 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.
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.

Draft environmental statement (ES) project description chapter(s)

Ref No.	Paragraph/ Section	Comment or question
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.
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

Draft environmental statement (ES) project description chapter(s)

Ref No.	Paragraph/ Section	Comment or question
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 • 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.

Draft environmental statement (ES) project description chapter(s)

Ref No.	Paragraph/ Section	Comment or question
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 • 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.

Draft book of reference (BoR)		
Ref No.	Page/ Plot Ref	Comment or question
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.
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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
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		• 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 Saltholme Nature Reserve and Teesmouth National Nature Reserve, the Marine Management Organisation regarding marine licenses, Natural England on ecology matters, the Environment Agency in relation to the connection corridors situated in potentially higher flood risk areas (Food Zones 2 and 3) and whether agreement has been reached on the flood risk modelling used, and its discussions with Historic England on its assessment and mitigation of heritage assets such as the Grade II listed Haverton Hill and Port Clarence War Memorial and listed properties in Cowpen Bewley • the progress made on drafting any likely control documents needed, such as a Construction Environmental Management Plan (CEMP) and a Site Waste Management Plan (with segregation and licensed disposal) • progress made on the management of abnormal loads and route feasibility for construction vehicles in an emerging Construction Traffic Management Plan (CTMP) and Construction Worker Travel Plan (CWTP), what the main mitigation measures are likely to be and whether agreement has been reached with National Highways on the applicant's approach
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		• the degree to which any bespoke protective provisions will be needed for the application and the preparedness for producing statements of common ground with relevant statutory undertakers to ensure an efficient examination • the extent of potential unexploded ordnance (UXO) in the area and the assessments being undertaken to mitigate any risks. It would be helpful if the applicant could indicate in its next iteration of the issues tracker whether these matters have already been addressed in the Preliminary Environmental Information Report or other equivalent documents, at its next meeting with the Inspectorate.
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