

Date: 21 September 2026
Your Ref: EN0110025
Our Ref: 16694a



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**For the attention of Tracey Williams
Case Manager Team Leader**

The Planning Inspectorate
c/o QUADIENT
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By email to: lighthousegreen@planninginspectorate.gov.uk

Dear Tracey,

APPLICATION FOR DEVELOPMENT CONSENT UNDER SECTION 37 PLANNING ACT 2008 FOR THE CONSTRUCTION, OPERATION AND MAINTENANCE OF A SUSTAINABLE AVIATION FUEL PRODUCTION FACILITY AND ASSOCIATED DEVELOPMENT.

LIGHTHOUSE GREEN FUELS PROJECT, LAND AT SEAL SANDS (FORMER INEOS NITRILES SITE) TO THE NORTH AND SOUTH OF THE RIVER TEES WITH CONNECTION CORRIDORS ACROSS THE TEES, STOCKTON-ON-TEES, TEESSIDE, TS2 1UB

We are pleased to make an application under Section 37 of 'The Planning Act 2008' (the PA 2008) for a Development Consent Order (DCO) on behalf of LGF Projects Limited (the 'Applicant') (Company number 16455871) to the Secretary of State (the SoS) for Energy Security and Net Zero in respect of the Lighthouse Green Fuels Project (the 'Application').

The Application is seeking development consent for the construction, operation (including maintenance) and decommissioning of a commercial-scale second generation Sustainable Aviation Fuel (SAF) production facility and associated infrastructure. (the Proposed Development).

Purpose and Need

SAF is an energy vector to be blended and used in the aviation industry as an alternative to fossil-fuel derived kerosene fuel. The UK Government's SAF Mandate places an obligation on fuel suppliers to supply an increasing amount of SAF in the overall UK aviation fuel mix.

A DCO is required for the Proposed Development as it benefits from a Direction dated 8 September 2025 made by the SoS under Sections 35(1) and 35ZA of the PA 2008 that states that the following elements be treated as one for which development consent is required: a main gasification facility to process sustainably sourced biomass; feedstock pre-treatment, syngas clean-up apparatus; Fischer-Tropsch process units; refining units; feedstock, intermediates and finished product storage; quayside with ship loading/ offloading infrastructure; supporting infrastructure and utility connections (hereafter called the



‘Specified Elements’), confirming that the SAF production facility and specified elements are development of national significance requiring development consent. Furthermore, part of the Proposed Development (a combined heat and power (CHP) generating station) is within the statutory definition of a Nationally Significant Infrastructure Project (NSIP).

The DCO, if made by the SoS, would be known as ‘The Lighthouse Green Fuels Order’ (the Order). The development requiring development consent and the NSIP and their associated development are formally described in Schedule 1 of the Draft Development Consent Order (**Application Document Ref: 3.1**) and the Planning Statement (**Application Document Ref: 5.2.1**).

The Proposed Development is anticipated to be the UK’s first commercial-scale second generation SAF production facility which will process over one and a half million tonnes of feedstock from sustainably sourced biomass per year. The Proposed Development would make a significant contribution to meeting the SAF Mandate, which began in 2025 at 2% of total UK jet fuel demand, increasing linearly to 10% in 2030 and then to 22% in 2040. The UK Government estimates that 1.2 million tonnes of SAF will be required to meet the 2030 SAF Mandate. The Proposed Development is being designed to produce over 135,000 tonnes per year of SAF and over 30,000 tonnes per year of green naphtha. This will be processed into approximately 180 million litres of SAF every year and would therefore make a substantial contribution towards meeting this objective.

The National Policy Statements (NPS) that have direct effect are the Overarching National Policy Statement for Energy (EN-1) and the NPS for Renewable Energy Infrastructure (EN-3). The Marine Policy documents that have direct effect are the UK Marine Policy Statement and the marine plan titled ‘North East Inshore and North East Offshore Marine Plan’. Other NPSs may have relevance for parts of the Proposed Development including the NPS for Natural Gas Supply Infrastructure and Gas and Oil Pipelines (‘EN-4’) and NPS for Electricity Networks Infrastructure (EN-5).

EN-1 sets out the UK Government’s urgent need for new large scale energy infrastructure to meet its objectives and set out the matters which the Proposed Development shall address. The Planning Statement (**Application Document Ref: 5.2.1**) and Policy Compliance and Accordance Tables (**Application Document Ref: 5.2.2**) submitted to support the Application set out the need in policy and the contribution of the Proposed Development to meeting this need, confirms the compliance of the Proposed Development with the rest of the policy in these NPSs, and describes the Proposed Development’s limited and unavoidable impacts and very clear and tangible benefits.

The Site

The draft Order Limits represent the land required for the Proposed Development (the Site). The Site is located on land to the north and south of the River Tees with the administrative areas of Stockton on Tees Borough Council (STBC) and Redcar and Cleveland Borough Council (RCBC) respectively.

The Site covers an area of 190.78 hectares (ha) comprising a Main Site, located entirely in north Tees, spanning 108.7ha , and a Wider Site covering the remaining 87.6ha.

The Main Site is located in the industrial area of Seal Sands approximately 5km east of Billingham town centre and 4km north-east of Middlesbrough town centre, in the borough of Stockton-on-Tees. The majority of the Main Site lies south of Seal Sands Road and largely comprises previously developed land formerly used as a chemical plant from the early 1970s. It was last operated by INEOS Nitriles.

The Main Site comprises the main SAF facility and its CHP generating station. The eastern boundary of the Main Site is formed by the River Tees, where existing jetties will be demolished and a new quay developed.

The Wider Site comprises the connection corridors, including land required for road access, pipelines (including routing through existing infrastructure under the River Tees), dredging near to the Main Site, and utility connections and construction laydown both North and South of the River Tees in RCBC's administrative area. The location of the Proposed Development including the Main and Wider Site is shown on the Location Plan (**Application Document Ref: 2.1**).

Proposed Development

The Proposed Development includes the following elements:

WORK NUMBER:	DESCRIPTION
Work No. 1	SAF production facility comprising: • 1A - feedstock pre-treatment facility including flue gas treatment and stack • 1B - SAF processing facility including thermal oxidiser, flue gas treatment, and stack • 1C - up to two flare structures
Work No. 2	CHP generating station comprising: • 2A - boilers and steam turbine generators • 2B - flue gas treatment and stack
Work No. 3	Feedstock and intermediate and final product handling and storage
Work No. 4	Cooling infrastructure for SAF production facility and CHP plant
Work No. 5	Bridge and culvert crossings of existing infrastructure
Work No. 6	Marine infrastructure comprising: • 6A - construction of permanent quay • 6B - permanent quay • 6C - capital and maintenance dredging
Work No. 7	Electrical connection works comprising: • 7A - underground and overground cable connections to the existing North Bank Supply Point

	• 7B - electrical connection works
Work No. 8	Modified or new natural gas connection and above ground infrastructure (AGI)
Work No. 9	Supply of industrial gases: Only one of Work No. 9A or Work No. 9B would be developed; • 9A - industrial gases connection works comprising installation of new and repurposing of oxygen and nitrogen pipeline connections, and connection to existing low pressure nitrogen supply • 9B - air separation unit (ASU) facility and connections to Work No. 1
Work No. 10	Modification or removal and replacement of industrial wastewater pipeline connection works
Works No. 11	• Export connection works: 11A - pipeline(s) for the export of SAF and renewable naphtha • 11B or 11C - a pipeline for the export of carbon dioxide (CO₂) connecting to AGI by others (being either AGI C1 or C2 of the Northern Endurance Partnership (NEP) transport and storage pipeline) Only one of Work No. 11B or Work No. 11C would be developed
Works No. 12	Surface water attenuation, and drainage and discharge works
Works No. 13	Laydown areas comprising: • 13A - temporary construction compounds and laydown areas • 13B - permanent laydown and storage
Work No. 14	Access works and private street improvements

In addition a range of further associated development is proposed in relation to the above.

A more detailed description of which elements of the Proposed Development constitute an NSIP, comprise development requiring development consent further to the 35 direction and which are associated development and ancillary works, is detailed in Schedule 1 of the draft Development Consent Order (**Application Document Ref: 3.1**) and explained in the **Explanatory Memorandum (Application Document Ref 3.2)**. The works are also described in Chapter 4: Proposed Development (**Environmental Statement ('ES') Volume I, Application Ref: 6.1.4**). The spatial areas within which each of the numbered works are to be built are denoted by the coloured and hatched areas on the Works Plans (**Application Document Ref: 2.3**).

Pre-Application Consultation

The Application is accompanied by a Consultation Report and its Appendices (**Application Document Refs: 5.1.1 to 5.1.8**) which provides details of the Applicant's compliance with the legislation prevailing for most of the pre-application period, namely sections 42, 46, 47, 48

and 49 of the 2008 Act, the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations') and the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') and relevant guidance.

The responses of statutory and other consultees are listed and summarised in the Consultation Report and have informed the Application and the Proposed Development. Whilst statutory pre-application consultation is no longer required following changes introduced by the Planning and Infrastructure Act 2025, the Consultation Report demonstrates how consultation and engagement were undertaken in line with the previous statutory requirements and how stakeholder feedback has been considered and taken into account when preparing the Application.

A summary of the Applicant's regard to PINS' Section 51 advice is contained in Section 8 of the Consultation Report (**Application Document Ref: 1.6**).

Environmental Impact Assessment

The Proposed Development represents Environmental Impact Assessment (EIA) development and the Application therefore includes an ES that reports the findings of the EIA undertaken. The EIA has been carried out, and the ES prepared, in accordance with the EIA Regulations.

The ES comprises the following documents, which form part of the Application:

- ES Volume 1: Chapters 1 to 23 (**Application Document Ref: 6.1.1 to 6.1.23**);
- ES Volume 2: Figures (**Application Document Ref: 6.2.1 to 6.2.87**);
- ES Volume 3: Technical Appendices (**Application Document Ref: 6.3.1 to 6.3.31**);
- ES Volume 4: Non-Technical Summary (**Application Document Ref: 6.4**).

Specific survey data relating to the presence and locations of rare breeding birds and wintering birds has been submitted in confidential ES appendices (**Application Document Refs 6.3.11 and 6.3.12 respectively**). No redacted equivalent is provided given the specialist nature of the documents.

Overview of the Application

The Application Guide (**Application Document Ref: 1.3**) lists the documents, including the ES, that make up the Application and how these comply with legislative requirements and relevant policy. The Application Guide is a 'live' document that will be updated during the examination of the Application, as required.

The location of the Site is shown on the Site Location Plan (**Application Document Ref: 2.1**) and the extent of the land for the Proposed Development (the Order land), including land over which powers of compulsory acquisition are sought and the location of Crown land are shown on the Land Plans (**Application Document Ref: 2.2**). The Works Plan (**Application Document Ref: 2.3**) identify the location and areas (the Works Areas) within which each of the main elements of the Proposed Development will be constructed and installed. The extent of the Works Nos. is denoted by the coloured and patterned areas on the Works Plan. New and

altered means of access are shown in the Access and Rights of Way Plans (**Application Document Ref: 2.4**), alongside detailing where streets and public rights of way will be subject to management controls under the draft DCO and the removal and relocation of navigation aids within the River Tees.

Indicative General Arrangement (**Application Document Refs. 2.5.1 and 2.5.2**), Indicative Elevations – Main Site (**Application Document Refs. 2.6.1 and 2.6.2**) and Indicative Floor and Roof Plans (**Application Document Refs. 2.7**) for the Main Site have been provided.

Existing and Proposed Site Plans and Proposed Sections, Isometric Drawings for the Marine Works have also been provided (**Application Document Refs. 2.8.1 – 2.8.4**). Drawings have also been submitted showing the Indicative Connection Routes (**Application Document Ref 2.9**) and typical details for Main Site boundary treatment and accesses (**Application Document Ref. 2.10**).

As previously described, Schedule 1 of the Draft Development Consent Order (**Application Document Ref: 3.1**) provides the detailed formal description of the Proposed Development and its elements and identifies the individual numbered works for those elements (shown on the Works Plans (**Application Document Ref: 2.3**)).

Schedule 2 of the Draft Development Consent Order contains a number of ‘requirements’ that will control the detailed design of the Proposed Development in addition to its construction, operation, decommissioning and site restoration to ensure that it remains within the scope of the EIA carried out and does not result in unacceptable impacts. Certain matters will require the submission to and approval by the relevant local planning authority.

The Draft Development Consent Order seeks powers of compulsory acquisition of interests and rights in land (including new rights) alongside temporary possession powers for construction and maintenance within the Order limits to enable the Proposed Development to be constructed, operated and maintained. The provisions relating to compulsory acquisition are set out at Part 5 of the Draft Development Consent Order (**Application Document Ref: 3.1**).

These provisions are explained in the Explanatory Memorandum (**Application Document Ref: 3.2**). The Explanatory Memorandum also explains the purpose and effect of each article and schedule of the Draft Development Consent Order, as required by Regulation 5(2)(c) of the APFP Regulations. It justifies the inclusion of relevant articles and requirements, including precedent for certain provisions. It has been prepared with regard to the advice in Planning Inspectorate (PINS) Advice: ‘Advice on the Preparation and Submission of Application Documents’ (March 2026). The Validation Statement (**Application Document Ref: 3.3**) confirms that the draft Development Consent Order has been successfully drafted in the form of a validated Statutory Instrument.

In preparing the Explanatory Memorandum and the draft Development Consent Order the Applicant has had regard to PINS’s feedback on draft versions of both documents as part of their standard tier pre-application service.

Information on the interests and rights that exist in relation to the land within the Order Limits is provided by the Book of Reference (**Application Document Ref: 4.3**). The justification for the proposed compulsory acquisition of interests and rights in land is set out in the Statement of Reasons (**Application Document Ref: 4.1**), and the Applicant's ability to fund this is confirmed by the Funding Statement (**Application Document Ref: 4.2**). The Pre-application Land and Rights Negotiations Tracker (**Application Document Ref: 4.4**) documents the status of negotiations with individual landowners, statutory undertakers that possess land, rights and/or apparatus. It is envisaged that this document will be updated throughout the Examination.

The Other Consents and Licences Statement (**Application Document Ref: 5.4**) identifies the consents and agreements to construct and operate the Proposed Development which are required separately from the DCO. The Statutory Nuisance Statement (**Application Document Ref: 5.5**) is submitted in accordance with Regulation 5(2)(f) of the APFP Regulations.

The Planning Statement (**Application Document Ref: 5.2.1**) sets out the need that exists for the Proposed Development and its compliance with the relevant National Policy Statements and other important and relevant matters such as recent UK energy and climate change policy and official evidence, other national planning policies, and local planning documents. The Planning Statement also provides an overview of the benefits and impacts of the Proposed Development and considers its overall acceptability in planning terms. A detailed assessment of the Proposed Development's compliance with the relevant NPS and Marine Policy and its accordance with local planning documents is contained in the Policy Compliance and Accordance Tables (**Application Document Ref: 5.2.2**).

The approach taken to the design of the Proposed Development including the adoption of a good design process, appropriate design flexibility and development of appropriate access solutions are set out in the Design Approach Document (**Application Document Ref: 5.3.1**). A statement of outline design principles is contained in Outline Design Principles (**Application Document Ref: 5.3.2**). The Outline Design Principles (**Application Document Ref: 5.3.2**) contain other physical and operational parameters which are secured by a Requirement in Schedule 2 of the Draft Development Consent Order (**Application Document Ref: 3.1**). The Potential Main Issues for Examination (**Application Document Ref: 5.6**) summarises, in a table, the main issues expressed by the consultees, which are likely to remain as topics of debate during the Examination, together with information on the Applicant's proposed solution to each. It is envisaged that this will be updated throughout the Examination.

A Flood Risk Assessment (**Application Document Ref: 5.7**) has been submitted in accordance with Regulation 5(2)(e) of the APFP Regulations. The Framework Landscape and Biodiversity Mitigation and Enhancement Strategy (**Application Document Ref: 5.8**) describes the mitigation and enhancement measures for the biodiversity, landscape and green infrastructure value of the Proposed Development Site.

The Nutrient Neutrality Assessment (**Application Document Ref: 5.9**) considers the potential nutrient impacts of the Proposed Development, and demonstrates how the Proposed Development will achieve nutrient neutrality. The Water Environment Regulations Assessment assess the impact of the Proposed Development on the relevant waterbodies (**Application Document Ref: 5.10**). A Report to inform Habitats Regulations Assessment (HRA)

has been submitted as required by Regulation 5(2)(g) of the APFP Regulations. Due to the presence of sensitive species specific environmental information that is to be seen only by certain environmental consultee organisations with a legitimate reason to know, a redacted (**Application Document Ref: 5.11.1**) and unredacted (**Application Document Ref: 5.11.2**) version of the Report to inform the HRA has been submitted.

Although information prescribed by Regulation 6(1)(a)(i) of the APFP Regulations is not strictly required due to the CHP Plant having no ongoing connection to the electricity grid, equivalent information about the electrical connections comprised in the Proposed Development is provided within the Electricity Grid Connection Statement (**Application Document Ref: 7.1**). Information prescribed by Regulation 6(4) of the APFP Regulations is set out in the Pipelines Statement (**Application Document Ref: 7.2**) and the Information prescribed by Regulation 6(3) of the APFP Regulations is set out in Harbour Facilities Statement (**Application Document Ref: 7.3**).

A Combined Heat and Power Statement (**Application Document Ref: 7.4**) provides an overview of the CHP aspect of the Proposed Development and its intended use within the Proposed Development, and demonstrates compliance with the relevant requirements of NPS EN-1 and EN-3. The Greenhouse Gas Reduction Strategy (**Application Document Ref: 7.5**) describes the measures to reduce greenhouse gas emissions associated with the Proposed Development in accordance with EN-1.

Application fee and Submission

The required fee on submission of £9,286.00 was paid to PINS by BACS and was received by the PINS finance team on 01 September 2026.

The Application Documents can be accessed at the secure PINS portal site set up by the Planning Inspectorate.

Other matters

The Applicant has submitted several unnumbered documents including the Electronic Application Index which identifies all documents and information submitted with the Application. The Applicant has submitted a completed Section 55 Checklist to demonstrate that the Application is of a satisfactory standard to be accepted for examination. A clean (all tracking removed) standalone Microsoft word version of the Draft Development Consent Order, with no header or cover page has also been submitted. The Applicant has also submitted the Biodiversity Net Gain (BNG) metric in Microsoft Excel spreadsheet format to the Applicant's BNG calculations to be verified.

A confidential version of Report to inform Habitats Regulations Assessment (**Application Document Ref: 5.11.2**) has been submitted, which is clearly marked "Confidential" on the front page. We request that it is not published. A redacted version of this document (**Application Document Ref: 5.11.1**) has been submitted for publication on the project webpage on the Planning Inspectorate's website.

We can confirm that Artificial Intelligence (AI) was used to provide summaries within the **Consultation Report (Application Document Ref. 5.1.1)** and it was used to assist with data

processing for the ground conditions desk study contained in **Appendix 21A: Coastal and Estuary Processes (ES Volume III, Application Document Ref. 6.3.18)**, having regard to the published Planning Inspectorate case work guidance: <https://www.gov.uk/guidance/use-of-artificial-intelligence-in-casework-evidence>.

In accordance with NSIP Advice on the Preparation and Submission of Application Documents a GIS file showing the Order limits was submitted to the Planning Inspectorate on 26 August 2026, more than 10 working days before the Application was submitted.

In accordance with Regulation 5(5) of the APFP Regulations, the Applicant retains all responses to the consultation carried out under Part 5 of the 2008 Act and can make them available at the request of the PINS and/or the SoS.

We look forward to receiving PINS' acknowledgement of receipt of the Application and in due course a decision on acceptance. In the meantime, should you have any questions with regard to the Application, DWD remain the point of contact. Please do not hesitate to contact myself or Nathan Cheung (Nathan.cheung@dwd-ltd.co.uk).

Yours sincerely,

Colin Turnbull MRTPI
Practice Director (Planning)
DWD Property and Planning Limited
For and on behalf of LGF Projects Limited

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